

**WSMR Comments on Draft Hazardous Waste Permit
Consolidated Editorial Comments, Typographical Errors, and Issues**

Comment Number	Citation [section, page, and line]	Draft Permit Item	WSMR Comment and Discussion	Recommended Change
1	Title Page	... SOCCORRO COUNTIES	Misspelling	... <u>SOCORRO</u> COUNTIES
2	Throughout	Department of Army	Incorrect title	Department of <u>the</u> Army
3	Throughout	permit	Inconsistent capitalization	<u>Permit</u>
4	Throughout	Facility operating record	Inconsistent capitalization	Facility Operating Record
5	Throughout	Facility or facility	Inconsistent capitalization	<u>Facility</u>
6	List of Acronyms, page 10	ESME-MC-PE GC-PA	Army-internal office symbols are subject to frequent change and are not relevant to the Permit conditions and should be deleted.	ESME-MC-PE- GC-PA
7	List of Acronyms, page 11	JHMMC	Delete this entry. Organization no longer exists	JHMMC
8	List of Acronyms, page 12	NR NR-ES	These Army-internal office symbols are obsolete. Office symbols in general are subject to frequent change and are not relevant to the Permit conditions. Entries should be deleted.	NR NR-ES
9	List of Acronyms, page 13	SAP satellite accumulation area	"area" should be replaced by "point"	SAP satellite accumulation <u>point</u>
10	I.J. p 20, line 30	Defines <i>Facility</i> as the entirety of White Sands Missile Range (WSMR). Elsewhere in the permit, the term is usually capitalized, but not always. Further, at times the context appears to apply to the place where hazardous wastes are stored and managed [the Container Storage Facility on Nike Avenue] and at times to all of WSMR. This leads to ambiguity in application of requirements.	We recommend that alternative, separate terms be used, so that there is no ambiguity. As a suggestion, the term, <i>WSMR</i> , will be used when referring to all of WSMR, synonymous with the RCRA term, <i>Facility</i> . When referring to the site on Nike Avenue [Container Storage Facility], we will use the term Hazardous Waste Storage Facility, or its acronym, HWSF. The balance of the places where hazardous wastes are managed, such as the 90-day yards and the satellite accumulation points, are operated by rule, not by permit and, thus, needn't be mentioned.	<u>Facility</u> means White Sands Missile Range, EPA ID Number NM 2750211235, owned by the United States Department of the Army and located in Dona Ana, Socorro, Lincoln, Otero, and Sierra Counties, New Mexico, including all contiguous land, and structures, other appurtenances, and improvements on the land, used for storage or disposal of hazardous waste. For the purpose of implementing corrective action, " <u>Facility</u> " means all contiguous property under the control of the owner or operator. Throughout the permit, the term, WSMR, will be used to denote "Facility."
11			Add a new definition for the HWSF and revise the permit to reflect the new terminology.	Hazardous Waste Storage Facility (HWSF) means the Container Storage Facility on Nike Avenue at WSMR. Throughout the permit, the term, HWSF, will be used to denote the Container Storage Facility.
12	I.J. page 21 lines 17 - 21	Operator means the person responsible for the overall operation of the Facility. The U.S. Department of Army is the operator of White Sands Missile Range	Revise to be consistent with entities identified in the Part A	Operator means the person responsible for the overall operation of the Facility. The U.S. Army White Sands Missile Range is the Operator.

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13		Owner means the person who owns the Facility or part of a Facility. The U.S. Department of Army, White Sands Missile Range is the owner of White Sands Missile Range.	do.	Owner means the person who owns the Facility or part of a Facility. The U.S. Army White Sands Missile Range is the Owner of White Sands Missile Range.
14		Permittee means the U. S. Department of Army	do.	Permittee means the U. S. Army White Sands Missile Range
15	I.J. page 21 lines 28ff	... into the environment (including the abandonment or discarding of barrels, containers, and other closed receptacles containing solid waste, hazardous waste or constituents).	Delete the material in parentheses as unnecessary and inaccurate.	... into the environment.
16	I.J.		This section needs definitions for both regulated and operating units.	
17	I.K.7 page 23 after line 32		Since this is a DOD installation and National Security provisions apply, escorts are needed for NMED inspectors. A sub-section 5. should be added to this effect	[new] 5. Due to National Security requirements, WSMR will provide appropriate escorts who will accompany NMED staff at all times.
18	I.K.7 page 23 line 34	... or regulation	Missing punctuation	... or regulation,
19	I.K.8.2 page 24 line 18	This period may be extended by NMED at any time and is automatically ...	Drop "may ... and" -- exceeds NMED authority	This period is automatically ...
20	I.K.8.2 page 24 lines 23 and 26	The name and qualification of the individual(s) ...	Drop "and Qualifications." -- not in CFR	The name of the individual(s) ...
21	I.K.9.1 page 24 line 32 and elsewhere	... 40 CFR 270.30(l)(1), no later than 60 calendar days prior to ...	Drop the 60-day specification for reporting -- not in CFR.	... 40 CFR 270.30(l)(1).
22	I.K.9 page 26 lines 27-29	7. Unmanifested waste report The Permittee shall submit an unmanifested waste report to the NMED within 15 days of receipt of 29 unmanifested waste [40 CFR 270.30(1)(6)].	Since the Permit elsewhere [II.B.2] forbids receipt of waste from an outside source, this provision would seem unnecessary.	Delete all of item 7.
23	I.K.10 page 27 line 31	... 40 CFR 270.12. The Permittee ...	WSMR must be able to cite national Security issues in the same manner as company confidential information is allowed. Request adding a new sentence to this effect.	... 40 CFR 270.12. <u>National Security-related information will also be identified and access restricted.</u> The Permittee ...

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24	I.K.13 page 28 lines 14-15	The information repository should be either at the Facility or in either the City of Las Cruces or the City of Alamogordo and must be accessible to the public ...	Delete the specification of repository location - - exceeds NMED authority.	The information repository must be accessible to the public ...
25	I.L. page 30 line 15	... 30 days after receipt of notice ...	Change 30 day to 90 days. This is a more reasonable time frame for response.	... 90 days after receipt of notice ...
26	I.M. page 30 lines 28-29	Provisions Governing Extensions of Time	The attempt to add enforceable due dates to the permit terms by illegal modification of the permit after it has been issued should be deleted. If the due date is not included in the terms of the permit that were subject to public notice and other administrative due process, then it cannot be subsequently be made enforceable without formally modifying the permit and providing the permittee with an opportunity for due process. 20 NMAC 20.4.1.901A clearly says a Draft Permit shall contain all conditions and compliance schedules. Totally new compliance dates cannot be arbitrarily added to the permit and made enforceable without the opportunity for modifying the permit under 20.4.1.901B. For examples 40 CFR Appendix I to 270.42, shows changes to compliance dates as Class 1 modifications, and changes to final compliance dates as Class 3 modifications. The Appendix notes these changes as changes to existing dates in a permit, not the creation of a new date by modifying the permit terms.	Delete the provision.
27	II.A page 31 line 8	... list and map	There appears to be some text missing.	Provide missing text.
28	II.B.1 page 31 lines 17 and 18 AND	The Permittee shall store for subsequent transfer to a treatment, storage, or disposal facility only the hazardous wastes specified in Permit Attachment 1 (Part A of Permit Application).	Table 3-2 displays a much larger list of Permitted hazardous Wastes than is presented in the WSMR Part A. WSMR prefers the latter prescription, but does need consistency.	The Permittee shall store for subsequent transfer to a treatment, storage, or disposal facility only the hazardous wastes <u>listed in Table 3-2 of this Permit</u>
29	III.B.1 page 48 lines 14 and 15	The Permittee shall store for subsequent transfer to a treatment, storage, or disposal facility only the hazardous wastes listed in Table 3-2 of this Permit		No change.

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30	II.B.2 page 31 line 21	... sources other than the permittee or its contractor(s) ...	Tenants, and other authorized on-site organizations may also generate hazardous waste that must be managed under this permit. A clause identifying these other authorized entities should be added	... sources other than the permittee, <u>WSMR tenant or visiting organizations</u> , or its contractor(s) ...
31	II.D.2.c page 36 line 13	The waste generator shall assign ...	WSMR assigns the identification number. The term "waste generator" should be replaced with "Permittee."	The <u>Permittee</u> shall assign ...
32	II.D.5.b page 40 lines 7ff	II.D.5.b Prohibition on Dilution as a Substitute for Treatment The Permittee shall not dilute a waste that is restricted from land disposal, or the residue from treatment of a restricted waste, as a substitute for treatment in compliance with 40 CFR 268.3. Dilution to avoid an applicable treatment standard includes, but is not limited to, the addition of solid waste to reduce a hazardous constituent's concentration or ineffective treatment that does not destroy, remove, or permanently immobilize hazardous constituents. The Permittee shall not aggregate a waste that is restricted from land disposal with other waste streams or materials as a substitute for compliance with 40 CFR 268.3. Aggregating or mixing wastes as part of a legitimate treatment process is considered permissible dilution for purposes of this Permit.	This section seems to state that we cannot mix any waste with waste we determined as land Disposal Restricted. This may be contrary to economics. WSMR understands and concurs in not mixing LDR waste to avoid LDR but we should be able to consolidate materials in similar categories in order to avoid managing many small containers. Delete the sentence "The Permittee shall not ... compliance with 40 CFR 268.3."	II.D.5.b Prohibition on Dilution as a Substitute for Treatment The Permittee shall not dilute a waste that is restricted from land disposal, or the residue from treatment of a restricted waste, as a substitute for treatment in compliance with 40 CFR 268.3. Dilution to avoid an applicable treatment standard includes, but is not limited to, the addition of solid waste to reduce a hazardous constituent's concentration or ineffective treatment that does not destroy, remove, or permanently immobilize hazardous constituents. Aggregating or mixing wastes as part of a legitimate treatment process is considered permissible dilution for purposes of this Permit.
33	II.E page 40-41 lines 21ff	Waste Minimization	This section specifies an aggressive and extensive waste minimization program -- enforceable. We find no regulatory authority for specifying the program.	Delete this provision in its entirety and replace with the statutory requirement (40CFR264.73(b)(9), only.
34	II.E page 41 lines 1 - 16	items 4 through 9	There is no regulatory authority for requiring these items.	Delete all.
35	II.I page 42 line 16	... Section (II.I) The ...	Missing punctuation	... Section (II.I) <u>.</u> The ...
36	II.K.3 page 42 line 34	... Permit Section II.K.23, ...	Incorrect citation.	... Permit Section II.K.2, ...

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Comment Number	Citation [section, page, and line]	Draft Permit Item	WSMR Comment and Discussion	Recommended Change
37	II.K.5 page 43 line 15	... Fire and Emergency Services Division (NR-SE-F), White Sands Security Office (GC-SD), White Sands Medical Clinic (MCHM-MCH), and ...	Army-internal office symbols are subject to frequent change and are not relevant to the Permit conditions. Items in parentheses should be deleted.	... Fire and Emergency Services Division, White Sands Security Directorate, White Sands Medical Clinic, and ...
38	II.K.5 page 43 lines 13--22 Arrangement with local Authorities [whole section]	The Permittee shall maintain Coordination Arrangements to familiarize the White Sands Missile Range Fire Department, Fire and Emergency Services Division (NR-SE-F), White Sands Security Office (GC-SD), White Sands Medical Clinic (MCHM-MHC), and the Department of Occupational Safety and Health with the layout and potential hazards at the base in accordance with 40 CFR 264.37. The Permittee shall provide these organizations with a copy of their Contingency Plan (Permit Attachment 3). Copies and descriptions of coordination agreements between the various White Sands Missile Range departments shall be maintained in the operating record in accordance with the requirements of 40 CFR 264.37(b).	This is not the way we do business. Planning and coordination among WSMR entities is continuous and internal to the Range. No outside entities are involved in hazardous waste responses, so there is no necessity for written agreements. The current Contingency Plan is shared as shown. The text should be changed to reflect the WSMR organization and practices.	The Permittee shall provide the White Sands Missile Range Fire and Emergency Services Division, White Sands Security Office, and White Sands Medical Clinic with a copy of their Contingency Plan (Permit Attachment 3).
39	II.K.5 page 43 line 24	... authorities contracted decline ...	Misspelling	... authorities <u>contacted</u> decline ...
40	II.M.1 page 45 lines 9-10	8. The names, addresses, and phone numbers of the Emergency Coordinator (EC) and all persons designated as Alternate Emergency.	A current roster of relevant personnel is maintained by the Emergency Operations Center (EOC) [available through 911]. All notifications are handled through the EOC.	.Delete item 8 in its entirety
41	II.M.2 page 45 line 19	... available to NMED upon request within four hours of such request.	A four-hour time frame is unreasonably short. A 24-hour cycle is more appropriate	... available to NMED upon request within <u>twenty-four</u> hours of such request.
42	III. Page 47 line 16	... within the base boundaries, ...	Incorrect title	... within the <u>Installation</u> boundaries, ...
43	III.A page 47 line 24	... HARZARDOUS ...	misspelling	... HAZARDOUS ...

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44	III.A page 47 line 25-26	The Permittee shall manage and store hazardous waste in the HWSF in accordance with the following conditions:	Rewrite and expand for clarity.	The Permittee may store an estimated volume of hazardous waste as dictated by the total quantity of spill containment. As required by 40 CFR 264.175 (3); The containment system must have sufficient capacity to contain 10% of the volume of containers or the volume of the largest container, whichever is greater. Containers that do not contain free liquids need not be considered in this determination. The total spill containment presently within the HWSF is 8861.2 gallons. This translates to a total storage capacity of liquid wastes of 88612 gallons storage within the HWSF. All storage of hazardous waste shall be in accordance with compatibility determinations as defined by the Resource Conservation and Recovery Act (RCRA) and fire regulations. The Permittee may only store hazardous waste generated within the boundaries of WSMR and must dispose of its wastes off-site through a licensed treatment, storage or disposal contractor.
45	III.A.1 Page 33 lines 28ff	Storage Location and Quantities The Permittee shall manage and store hazardous waste containers located in the HWSF in accordance with Table 3-1 below. The Permittee shall not manage and/or store hazardous waste in excess of the maximum capacities specified in Table 3-1 of this Permit Section.	Revise for clarity and simplicity	Storage Location and Quantities The Permittee shall manage and store hazardous waste containers located in the HWSF <u>as specified in part III above.</u>
46	III.A.1 page 48 Table 3-1	Total Storage Capacity of the HWSF	Contains extraneous and erroneous data.	Replace with supplied Table 3-1
47	III.B.1 page 49 Table 3-2	F Codes: Wastes from non-specific sources	WSMR needs to make provision for management of plating wastes.	Add F007, F008, and F009 to this portion of Table 3-2
48	III.G page 51 line 9	The Permittee shall maintain secondary containment systems for all containers in the HWSF ...	This should apply only to liquids. Add the word 'liquid' before 'container.'	The Permittee shall maintain secondary containment systems for all <u>liquid</u> containers in the HWSF
49	III.H. page 51 line 15	... (Inspections), in accordance with ...	Missing the word "and."	... (Inspections), <u>and</u> in accordance with ...
50	III.I page 51 line 18	... Permit Section II.M, in accordance with ...	There appears to be some text missing.	... Permit Section II.M, [provide missing text] in accordance with ...

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51	IV.A. page 53 lines 4ff	The Facility contains 41 regulated units which are listed in Table 4-4 in Appendix 4. The Container Storage Unit is the only operating unit. Two regulated units are undergoing post-closure care and six units have been clean closed and do not require post-closure care. The remaining 32 regulated units are either undergoing closure or require submittal of a closure plan. The Permittee shall submit a closure plan for each unit that addresses all closure activities that have not yet been completed.	This section contains some inaccuracies [numbers of units, etc.] The simplest means of correcting the deficiencies is to merely cite Appendix 4, which [when corrected] will provide the same information.	The Installation contains the regulated units listed in Table 4-4 in Appendix 4. The Container Storage Unit is the only operating unit. For the regulated units for which closure is not complete, the Permittee shall submit a closure plan that addresses all closure activities that have not yet been completed.
52	IV.B.1 page 53 line 20	... managed in unit ...	Missing the word "the."	... managed in <u>the</u> unit ...
53	IV.C. page 54 line 3	... Permit Section IV.8 constitute ...	Typographical error.	... Permit Section IV. <u>B</u> constitute ...
54	IV.C. page 54 line 8	... results contaminant ...	Missing the word "of."	... results <u>of</u> contaminant ...
55	V.B. page 55 line 12	... pursuant 40 CFR ...	Missing the word "to."	... pursuant <u>to</u> 40 CFR ...
56	V.B. page 55 line 13ff	The Permittee shall conduct post closure care activities for Rhodes Canyon Landfill ...	This paragraph, together with its subsections, appears inappropriate for inclusion in the permit. Memorializing details such as this merely hampers necessary flexibility in site management.	Delete all lines 13 - 19.
57	V.D.1 page 55 line 28	For hazardous wastes disposed of before January 12, 1981, the Permittee shall ...	Please confirm date	Please confirm date
58	V.D.1.a page 56 line 11	... filed with the NMED, and the appropriate county ...	Delete reference to county. These are Federal lands with real estate records internally managed.	... filed with the NMED ...

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59	V.G. in its entirety pages 56 - 59	.	This entire subsection is unnecessary. The units of the former OB/OD are identified as SWMUs in the relevant table in Appendix 4. Possible investigation and corrective measures will be adequately addressed with the procedures identified in the appendices to the permit. There is no need to provide redundant guidance here. Further, the subsection, as written, is incomplete, inaccurate and somewhat circular in its presentation of requirements.	Delete Section V.G.
60	Attachments 1 - 6 all.		These items are all taken, verbatim, from the 2004 permit application. WSMR was not aware that they would be incorporated, wholesale. The material has been updated, corrected, and reworded to make them more suitable for direct inclusion in the permit. A redline/strikeout version is presented, along with a revised final version.	Replace Attachments 1 - 6 with the provided replacements.
61	Appendix 1, page 2, section 1.1.4, 3rd line	... San Andres Mountains, San Agustin, and the Oscura Mountains ...	misspelling and faulty parallelism.	... San Andres, San <u>A</u> gustin, and Oscura Mountains ...
62	Appendix 1, page 2, section 1.1.5, 4th line	... Organ, San Agustin, and San Andres ...	misspelling	... Organ, San <u>A</u> gustin, and San Andres ...
63	Appendix 1, page 2, section 1.2.1 and 1.2.1a through 1.2.1d	Details concerning HWSF	These sections, drawn from the WSMR permit application, requires extensive updating and correcting. WSMR has provided a rewritten substitute	Use provided alternative text.
64	Appendix 2, Maps and Figures	Figure 2 Hazardous Waste Storage Facility	This is not a current representation of the facility. WSMR is providing a replacement that reflects the current and planned configuration.	Replace Appendix 2 -- Figure 2 with the supplied drawing.
65	Appendix 2, Maps and Figures	Figures 3 -- 5 are taken from the permit application.	They were intended as cartoons that showed how the interior of the buildings might be configured. It was never permittees intent to always, and inflexibly, utilize this configuration. The applicable regulations will be followed, but the geometry shown will not.	Delete Figures 3 -- 5.

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66	Appendix 3, page 10 Section 3.1 6.	Section 3.1 6. calls for a Range-wide determination of perchlorate occurrence.	This section should be deleted in its entirety as outside of the scope of the Hazardous Waste Bureau's (HWB) jurisdiction, since the material is a military munition used for its intended purpose, and it remains on an active military range. The material simply is not a solid waste, and is not subject to regulation. Furthermore, there is no waiver of sovereign immunity in New Mexico that gives the HWB jurisdiction over perchlorate. There is no regulatory standard applicable to federal facilities in New Mexico for perchlorate. There is no maximum contaminant level (MCL) for perchlorate in federal law or regulation, neither is there a duly promulgated state regulatory standard in New Mexico law or regulation.	Delete section 3.1.6 in its entirety.
67	Appendix 4 all tables therein	Rendition of all known or reputed SWMUs, AOCs, etc.	Many of these units are, and have been, appropriately remediated or found to not require remediation. Some have a regulatory status at odds with the specifications in the Tables. NMED should recognize, and memorialize, previous documentation and findings. Further, a number of these units have been investigated and deemed NFA. Corrections will be made as part of the first deliverable required under Appendix 8.	These tables should be populated starting with the 2006 NMED Fee Listing table received from NMED in October 2006 (a continuation of past Annual Unit Audits); units listed that are not listed in the October 2006 listing will require research and justification. Many appear to be from the RFA phase and not investigated further as determined by EPA Region 6.
68	Appendix 5, Section 5.2 page 21 [the complete section]	Detailed presentation of most elaborate and rigorous investigative methods known.	The presentation of Investigation, Sampling, and Analysis Methods is far too extensive, rigid, and inappropriate. Such material has no place in the requirements of a permit that needs be flexible in its requirements and adaptable to site-specific conditions. In most cases, these research-grade provisions are overkill and exceed NMED authority to impose in such a blanket fashion. This material should be deleted from the permit and issued, if at all, in a guidance document.	Delete the sentence in the second paragraph beginning with "The methods presented in Section 5.2 ..." and delete section 5.2 in its entirety. Additional specific comments on parts of Section 5.2 follow.

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69	Appendix 5 / Appendix 6	All	The prescribed investigative methods in Appendix 5 should not be dictated in the Permit but rather should be issued as NMED guidance and considered on a site-by-site basis. Leaving them in the permit would be too rigid and require a permit modification if a deviation is required – an inefficient and expensive process	Permittee in negotiation with NMED shall develop site specific work plans which will be followed.
70	Appendix 5 Section 5.2.2.b.i page 23	Exploratory borings shall ...	As a general rule, the depths specified are excessive and will sometimes be unattainable. Recommend prescribing or approving site-specific limits in the required work plans.	Delete the sentence beginning, Unless otherwise specified and all numbered items below.
71	Appendix 5 Section 5.2.2.b.ii page 24 [the complete section]	Soil and Rock Sampling	Such elaborate procedures are almost never justified. Further, routine analytical laboratories should NEVER perform the homogenization step, since they have no insight into the nature of the sample.	Delete all in favor of site-specific work plans and separately-published guidance.
72	Appendix 5, Section 5.2.2.g. page 28 [the complete section]	Section 5.2.2.g. calls out specific tests and elaborate sampling equipment for subsurface vapor sampling and measurement.	Absent a need for any of these data for design or implementation of corrective action, there is no justification for requiring either the sampling method or the measurements themselves. Further, we doubt the meaningfulness of oxygen, carbon dioxide, static pressure, carbon monoxide. Nor do we believe there are reliable methods for gathering much of the data in the field. Recommend this specifications be reduced to those few that can reliable be measured and that will contribute to selection of a remedy.	Delete all following first paragraph.

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73	Appendix 5, Section 5.2.2.i page 29 text and unnumbered table.	Section 5.2.2.i calls out certain general chemistry determinations to be made on routine ground-water samples. It further specifies that <u>all</u> saturated zones contributing to a monitor well be sampled and that newly-installed wells be sampled between 10 and 30 days after completion.	The utility of the "general chemistry parameters" listed is not universal. Selection of non-hazardous constituents should be left to site-specific work plans. As has been pointed out to NMED in the past, all field determinations of carbon dioxide are, in actuality, based on measurement of alkalinity. Given the high natural alkalinity of ground waters at WSMR, the calculation is meaningless. For typical monitor wells, especially those that have a sand-packed screen, sampling discreet water-bearing zones is infeasible. Further, especially in the tight formations usually encountered at WSMR, standard industry practice calls for at least 30-day interval between installation and sampling	Delete the section in its entirety.
74	Appendix 5, Section 5.2.2.i.iv page 31, third paragraph	Section 5.2.2.i.iv calls for the universal collection of field blanks and does not specify the correct source of the water.	It is our understanding that field blanks are meaningful only in support of determinations of VOCs, and then only in environments where airborne vapor contamination is likely, such as in the immediate vicinity of a refinery or chemical plant. Specification of field blanks should be limited to those special cases where the data there from will be meaningful.	Delete the paragraph in its entirety.
75	Appendix 5, Section 5.3 page 35ff	Section 5.3 calls out certain laboratory testing and reporting requirements.	The requirement to use 'the most sensitive methods available' will need to be tempered by the abilities of routine analytical labs. Recommend that the requirement speak only to the ability of the selected laboratory and analytical method to meet the needs of the study. Further, the section implies that all data be accompanied by what amounts to Level IV data packages and that the data undergo some formal qualification process. Again, the issue is one of bringing all data up to the status of 'unassailable.	Strike the last sentence in the first paragraph, beginning "The Permittee shall ..."
76	Appendix 7	General comment	A table listing each document type would be helpful on the first page of Appendix 7. The table would in effect act as a Table of Contents or Index for the Permittee/Regulator as a quick reference to all the document types discussed in the Appendix.	Provide requested table.

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77	Appendix 8, page 88	Work Plan or Closure Plan Submittal Schedule	Given the uncertainty surrounding the effective date of the Permit, itself, it is inappropriate to put "hard" dates for deliverables. All should be replaced with XX dates after Permit issuance.	Replace all dates with equivalent "days after permit issuance."
78	Appendix 8, page 88 Table row 1	Work Plan or Closure Plan Submittal Schedule	First deliverable (SWMU/AOC "next required CA doc...") unclear and will require at least 90-days following permit approval to determine CA document necessary for each unit.	Replace October 31, 2007 with 90 days after Permit issuance.
79	Appendix 8, page 88 Table row 2	Closure Plan for the Former Oscura Range Landfill	A closure plan for ORC landfill is no longer pertinent since closure activities have already occurred. Closure documentation is currently (Aug 07) under review by NMED.	Delete due date, rewrite.
80	Appendix 8, page 88 Table row 3	Post closure care plan of the OB/OD ...	This document is in the hands of NMED. WSMR is awaiting review comments	Delete due date.

Table 3-1. Total Storage Capacities of the HWSF

Type of Storage Unit	Floor Area (sq ft)	Spill Containment (gallons)	Maximum Liquid storage capacity (gallons)
Building S22895A 15 by 8 feet	120	308	3080
Building S22895B 15 by 8 feet	120	308	3080
Building S22895C 15 by 8 feet	120	308	3080
Building S22895D 7 by 8 feet	56	150	1500
Building S22895E 24 by 10 feet	240	750	7500
Building S22895F 24 by 10 feet	240	750	7500
Building S22895G 24 by 10 feet	240	750	7500
Building S22895H 24 by 10 feet	240	750	7500
Building S22895 32 by 55 feet	Overflow and non RCRA regulated waste- This includes waste not destined for municipal landfills and /or requires special disposal (1536 sq ft)	4787.2	47872
Total			88612

