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CERTIFIED MAIL – RETURN RECEIPT REQUESTED

December 19, 2018

Colonel Stewart Hammons
Commander, 27th Special Operations Wing
110 E. Alison Avenue, Suite 1098
Cannon Air Force Base
New Mexico 88103

RE: ISSUANCE OF RESOURCE CONSERVATION AND RECOVERY ACT HAZARDOUS WASTE PERMIT FOR CANNON AIR FORCE BASE CANNON AIR FORCE BASE, NEW MEXICO
EPA ID #NM7572124454
HWB-CAFB-16-003

Dear Colonel Hammons:

The New Mexico Environment Department (NMED or Department) issues the attached Hazardous Waste Corrective Action Only Permit, for corrective action at Cannon Air Force Base to the U.S. Air Force (the Air Force or Permittee) owner and operator of Cannon Air Force Base (the Facility) located in Curry County, New Mexico, pursuant to the New Mexico Hazardous Waste Act (HWA), NMSA 1978, §§ 74-4-1 through 74-4-14, in accordance with the New Mexico Hazardous Waste Management Regulations (HWMR) 20.4.1 NMAC. The Permit requires the Permittee to conduct corrective action pursuant to the HWA and the HWMR

This Permit is a renewal of, and supersedes, the permit that was previously issued to the Permittee in October 2003.

An 60-day public comment period was held from October 6, 2017 to December 5, 2017. The comment period was subsequently extended to January 22, 2018 at the request of the Permittee. The only comments received during the comment period were from the Air Force. The draft permit was modified in response to the comments received. With the exception of typographical corrections, the modifications were limited to the tables in Permit Attachments 1 thought 3. Written responses to all comments received are attached.

This Permit is based on information submitted in Parts A and B of the Permit Application dated June 2013 submitted by the Permittee, and subsequent revisions and supplemental information, herein referred to as the Application.

This Permit shall be effective for a fixed term of ten years from its effective date, except as provided in Permit Section 1.8.3 (40 CFR § 270.50(a) and (b)). In accordance with 20.4.1.901.A(10) NMAC, the effective date of this Permit is January 18, 2019, 30 days after issuance of this notice to the Permittee.

Signed this 19th day of December 2018.

By _____
Bruce Yurdin
Acting Deputy Secretary
New Mexico Environment Department

File: CAFB-2018 Permit

New Mexico Environment Department
Response to Comments for
the Draft Resource Conservation and Recovery Act
Hazardous Waste Permit for Cannon Air Force Base
December 2018

On October 6, 2017, the New Mexico Environment Department (NMED) issued a draft Resource Conservation and Recovery Act (RCRA) hazardous waste permit to the United States Air Force (Permittee), the owner and operator of Cannon Air Force Base (the Facility), to conduct corrective action in accordance with New Mexico's Hazardous Waste Act (74-4 New Mexico Statutory Authority [NMSA] 1978) and its associated Hazardous Waste Management Regulations (HWMR) listed at 20.4.1 New Mexico Administrative Code [NMAC], which incorporates RCRA and its implementing federal regulations listed in 40 Code of Federal Regulations (CFR) 260 through 280 (Permit). The U.S. Environmental Protection Agency (EPA) authorized NMED to issue permits to ensure that corrective actions taken at the Facility to investigate and remediate sites where contaminant releases have occurred, with the intent of protecting human health and the environment in January 1996. The Permit requires the Permittee to conduct corrective action for releases identified at various solid waste management units (SWMUs) and areas of concern (AOCs) at the Facility. This includes any newly discovered or identified SWMUs and AOCs.

Prior to issuing a permit, NMED is required by regulation to release a draft permit for public comment in accordance with 20.4.1.900 and 901 NMAC. A 60-day comment period was initiated by NMED on October 6, 2017. The Permittee requested an extension to the original 60-day comment period. The Permittee's formal request for a comment period extension was received by NMED on November 16, 2017. NMED extended the public comment period on December 14, 2017 to January 22, 2018. Comments in response to the draft permit were only received from the Permittee and are referenced in Table 1: *Submitted Draft Permit Public Comment Response Documents* below. The NMED response to the Permittee's comments are provided in Table 2.

Table 1: Submitted Draft Permit Public Comment Response Documents

Document Code	Document Title	Document Submittal Date
1	Common Comment and Response Worksheet	January 5, 2018
2	Table 1: SWMUs to Remove	January 5, 2018
3	CAFB Triple Letter (+ZZ) AOC Descriptions	January 5, 2018
4	Table 1: AOC Comments	January 19, 2018

5	Table 2: Sites to Move to Table 3	January 22, 2018

Table 2: Summary of Public Comment and NMED Response Regarding Resource Conservation and Recovery Act Hazardous Waste Permit for Cannon Air Force Base

Topic Area	Document Code	Summary of Public Comment	NMED Response Number	NMED Response	Change to Draft Permit
Inspection and Entry Permit Section 1.13.8	1	The Permittee provided the following statement: "For security reasons, certain places and activities on CAFB are not permitted to be photographed without prior authorization. Language of paragraph 3 needs to reflect that. Suggest changing paragraph 3 to read: "have access to and photograph (with 27 Special Operations Wing Security Forces approval, if required) any facilities, equipment (including monitoring and control equipment), practices, or operations regulated or required."	1	Permit Section 1.13.8., directly quotes 40CFR 270.30 (i). NMED acknowledges that there are access limitations due to security issues. The NMED coordinates with all New Mexico Department of Defense and Department of Energy facilities with regard to access restrictions.	No
Typographical Error Permit Section 1.13.10.3.3	1	The Permittee provided the following statement, "[t]he Permittee shall include in the report a description of the spill response activities as required in Permit Section 2.8.5. Section 2.8.5 deals with records and says nothing about spill response activities. Change to correct section number."	2	The Permit will be corrected to reflect the correct section reference number for the Five Day Written Report (Section 1.13.10.3.3). Permit Section 2.8.5 discusses the availability of records for inspection. Records of spill responses include corrective actions to investigate and clean up releases of contaminants to the environment and therefore are subject to the records requirements of 40 CFR264.74. The statement will be revised to state "The Permittee shall include in the report all records of spill response activities as required in Permit Section 2.8.5." Section 2.8.5 will be revised to correct the typographical error "…the all records required to be maintained…" to remove "the" from the sentence.	Yes

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Permit Requirements	1	The Permittee provided the following statement in Response to Permit Part 2: General Facility Conditions (Part 2):"Cannon's Hazardous Waste program complies with all requirements to remain a non-permitted operation. By including Part 2: General Facility Conditions in the permit, it overrides the non-permitted status of Cannon's program. As outlined in 40 CFR 270.1(c)(2), generators who accumulate hazardous waste on-site for less than the time periods provided in 40 CFR 262.34 are not required to obtain a RCRA permit; the latter citation indicates that waste can be accumulated for 90 days or less "without a permit or without having interim status." Specific exceptions are addressed, none of which apply to Cannon AFB. Consequently, the exclusion specified in 40 CFR 270.1(c)(2) applies to Cannon AFB. It appears that the State of New Mexico has implemented 40 CFR 270 with exceptions as outlined in 20.4.1.900 NMAC; however, no exceptions are provided that would remove the exclusion allowed under 40 CFR 270.1(c)(2). It should also be noted that the State of New Mexico has implemented 40 CFR 262.34 as outlined in 20.4.1.300 NMAC; no	3	The Facility continues to be Permitted for currently ongoing corrective action responsibilities associated with the former designation as a permitted RCRA Treatment, Storage, and Disposal Facility (TSDF). Prior to 2003, the Facility was allowed to store hazardous waste for a period of one year at a designated hazardous waste storage facility (Building 226). However, the Permittee opted to discontinue long-term storage of hazardous waste prior to renewal of the Permit in 2003. NMED confirmed clean closure of the Building 226 hazardous waste storage facility, which was documented in NMED's December 19, 2003 *Closure of Hazardous Waste Storage Facility Building 226-Hazardous Waste Management Unit 66 [SWMU 66]* response letter. NMED understands the Permittee currently generates and manages hazardous waste as a Large Quantity Generator (LQG) at various less than 90-day accumulation and storage areas throughout the Facility, which does not require permitting under the RCRA Program. However, continuing RCRA corrective action requirements associated with identified SWMUs and AOCs at the Facility are tied to 40 CFR 264.101, Corrective Action for Solid Waste Management Units. Closure of the Permittee's former permitted hazardous waste storage facility does not exempt the Permittee from its obligation to complete corrective actions at identified SWMUs and AOCs or any newly identified SWMUs or AOCs, as required by 40 CFR 264.101. Therefore, the Facility is still obligated to comply with any applicable provisions of 40 CFR 264, Standards for Owners and Operators of Hazardous Waste, Treatment, Storage, and Disposal. NMED has included all applicable requirements of 40 CFR 262, 264, 266, and 270 in Part 2 with the intent of providing the Facility with guidelines which prevent or mitigate any release at the Facility that may adversely affect human health or the environment. Additionally, Part 2, Section 2.5.3, Waste Accumulation Time reiterates and	No

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		exceptions are provided that direct more strenuous time periods. As previously addressed, specific exclusions to permit hazardous waste accumulation sites (HWAS) are addressed in 40 CFR; no exceptions to those exclusions are addressed in 20.4.1 NMAC. By virtue of the fact that requirements are placed under Part 2 of the Draft RCRA (Corrective Actions) Permit, the exclusion {40 CFR 270.1(c)(2)} would be over-ridden by permit requirements. Additionally, should the 90-day HW Accumulation Site become "permitted," it would have to under-go closure action again, a costly activity which was completed in 2012 when Cannon's TSDF was closed; NMED has concurred with that closure action. Part 2 should be removed from the final Permit."		acknowledges the Facility's current hazardous waste LQG status as understood by NMED. Part 2 also provides general guidelines for appropriate housekeeping practice, maintenance, and upkeep critical to preventing any additional releases at the Facility, and ensures associated record keeping protocols are maintained in support of continued corrective actions activities. The stipulations outlined in Part 2 of the draft permit do not override the Permittee's current LQG status, nor does it require permitting of the Facility's current less than 90-day hazardous waste storage area. The NMED understands that the Facility practices already generally comply with the Permit requirements; therefore, no additional burden is imposed on the Permittee, while noncompliance with these requirements could result in potential safety or exposure hazards.	
Notification of Changes to Facility Staff	1	The Permittee provided the following statement in response to Permit Section 2.8.7, Personnel and Telephone Number Changes which requires written notification for changes to key Facility signatory staff: "Will an email suffice as to inform NMED in writing?"	4	To clarify the statement, information pertaining to changes in key administrative staff associated with the Facility environmental restoration program responsible for RCRA Program activities may be provided to NMED as email or letter communication. Any change in key Facility signatory staff such as the principal executive officer for the Facility must be submitted formally in writing in accordance with 40 CFR 270.11 and must include all pertinent contact information. NMED must be notified of any change to key administrative management personnel associated with the Facility's RCRA Program activities and its executive officers	No

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				within 15 days of the personnel change. No changes to Section 2.8.7 of the draft permit have been made.	
Typographical Error Section 2.6	1	The Permittee provided the following statement, “Heading "Transport Storage and Disposal of Waste Military Munitions” needs commas: "Transport, Storage, and Disposal…". Also, first line of the first paragraph says "treatment" instead of "transport". Is one of those incorrect?”	5	The typographical error noted in the heading for Permit Section 2.6 will be changed to reflect the Permittee’s comment. Additionally, the Permit section heading and Paragraph 1 will be revised to reflect the content of the permit section. The section heading and text will be revised to indicate transport, storage, treatment, and disposal of waste military munitions.	Yes
Newly Discovered SWMU and AOC Notification Period Discrepancy Noted for Draft Permit Section 3.6.1	1	The Permittee provided the following statement: “As written this section duplicates the intent of paragraph 3.2.1 but disagrees with the notification period for a new discovery. Five day written notice is impractical given the levels of bureaucracy involved. Recommend keeping with the 15-day written notification period mentioned in 3.2.1 and contained in the old permit. The oral notification requirement is not unreasonable.”	6	Permit Section 3.6.1., Notification of Newly Discovered SWMUs and AOCs, will be revised to reflect the stipulations of Permit Section 3.2.1, Newly Discovered SWMUs and AOCs, which requires 15-day notification for the discovery of any newly identified potential SWMUs or AOCs.	Yes

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Newly Discovered SWMU and AOC Notification Period Discrepancy Noted for Draft Permit Section 3.6.2	1	The Permittee provided the following statement in response to a noted discrepancy in the newly discovered SWMU and AOC notification period identified for draft permit Section 3.6.1: "same discussion as for 3.6.1"	7	Permit Section 3.6.2, Notification of Release will be revised to reflect the 15-day written notification requirement as stipulated in Permit Section 3.2.1, Newly Discovered SWMUs and AOCs.	Yes
Reconciliation of SWMU and AOC status in Draft Permit Attachment 1: General Facility Description	1	The Permittee provided the following statement for draft permit Attachment 1:"Ensure numbers of SWMUs & AOCs that require corrective action and those that have completed corrective action are correct."	8	NMED has noted the discrepancy in the information provided for the number of SWMUs and AOCs listed in Attachment 1 of the draft permit, which have completed corrective action and those requiring corrective action in draft permit Attachment 3, Corrective Action Status Tables. The statement will be revised to state, "SWMUs and AOCs requiring corrective action are listed in Permit Attachment 3, Corrective Action Status Tables, Table 1, List of SWMUs and AOCs Requiring Corrective Action (Table 1). SWMUs and AOCs which have completed corrective action are listed on Permit Attachment 3, Table 2, List of SWMUs and AOCs with Corrective Action Complete with Controls Status (Table 2) and Table 3, List of SWMUs and AOCs with Corrective Action Complete without Controls Status (Table 3)."	Yes
Permit Attachment 2: Facility SWMU and AOC Facility Map	1	The Permittee provided the following statement in response to the Attachment 2 Facility Map of the Draft Permit: "Cannon map will need to be updated to reflect the status of any SWMUs and AOCs that have shifted Tables. Cannon will provide an	9	Noted. The Facility Map as finalized by the Permit will be included in Permit Attachment 2. However, all identified SWMUs and AOCs regardless of their status must be retained on the final Facility map provided by the Permittee.	Yes

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		updated map once the matters have been resolved."			
Typographical Error	1	The Permittee provided the following statement for draft permit Attachment 3, Corrective Actions Status Tables (Attachment 3): "UST @ SWMU 70 was only 220 gallons, not 20,000 gallons."	10	The noted typographical error will be corrected in the Permit renewal. The July 29, 1987 Preliminary Review/VSI [Visual Site Inspection] Report RCRA Facility Assessment (RFA) information indicates the unit was 2,000-gallon tank adjacent to the Vehicle Maintenance Shop. Subsequent information collected during remediation and assessment activities for SWMU 70 indicated that the unit was actually comprised of a 50-gallon oil water separator (OWS), a 220-gallon waste oil storage tank, and a leach well. The SWMU 70 Table 1 comment will be revised to reflect the field confirmed SWMU 70 components.	Yes
Typographical Error	1	The Permittee provided the following statement for draft permit Attachment 3 pertaining to the Table 1 entry for SWMU 103: "SWMU receives discharge from SWMU 100 via SWMU 99, not SWMU 9."	11	The typographical error has been noted for the SWMU 103 comment entry in the corrective actions status tables. The Table 1 comment entry will be revised to reflect that SWMU 103 receives discharge from SWMU 100 via SWMU 99.	Yes
Newly Identified SWMUs and AOCs	1	The Permittee provided the following statement: "The Air Force contests all of these AOCs pending NMED providing an RFA-like document containing justification as to why they should be included on the permit."	12	NMED's response to the Permittee's comment is provided in NMED Response to Comment Numbers 26 through 41.	Yes
SWMU 21-Non-Destructive Inspection	2	Permittee provided Real Property Accountable Record information in support of the comment that indicated that prior to 1986, SWMU 21 was	13	The comment information did not provide sufficient evidence to support a SWMU status determination. Operations conducted at the NDI Lab appear to have resulted in the generation, storage, treatment, and disposal of various waste	No

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(NDI) Lab Dip Tank		located at Building 185. The provided record indicated that Building 185 was demolished in 1996. Permittee comment information indicated SWMU 21 was a process tank, which did not manage waste. The solution in the tank was reportedly removed on an annual basis. The waste solution was then managed, stored, and disposed of by the Air Force Defense Property Disposal Office (DPDO). No releases were reported in association with SWMU 21. The Permittee further indicated that any releases from the unit would have collected at the building floor drains and would have been conveyed to the sanitary sewer system (SWMU 98). SWMU 98 was previously granted a corrective action complete without controls status. The Permittee recommended SWMU 21 also be granted a corrective action complete status and be moved to Table 3. Additionally, the Permittee indicated that NMED had previously concurred with a prior United States Environmental Protection Agency (USEPA) no further action determination for SWMU 21 as noted on Facility Permit Table 2, Footnote No. 1 and documented in NMED's February 27, 2006 *Final Permit Decision: Class 3 Permit Modification for No Further Action Status for 32*		materials, including hazardous waste. The available RFA information indicates that SWMU 21 is a 25-gallon tank located at Building 593. The tank was previously identified in Building 185, the prior NDI Lab facility location. Florescent dye was utilized at SWMU 21 during inspection of aircraft parts during maintenance operations. The RFA information indicates that NDI Lab operations date back to at least 1965, which predates RCRA regulation governing the management, storage, treatment, and disposal of hazardous waste. Therefore, additional information is required to support the Permittee's conclusion that prior waste management practice did not result in a release to the environment. This must be substantiated by comprehensive historical use, process, waste characterization, and management records information. Currently, the limited information provided by the Permittee and available in the previously completed RFA has resulted in a data gap, which must be resolved to the satisfaction of the NMED. Furthermore, NMED cannot make a status determination on a SWMU that is currently in use (i.e., Active Building 593 NDI Dip Tank). Review of the 2006 Permit Modification indicates that the prior SWMU 21 status determination was based solely on information provided in the RFA. NMED considers the information provided in the 1987 RFA outdated and insufficient for status determinations. Updated information is required for any further status determination. As agreed to by NMED and the Permittee during a meeting on December 12, 2018 and a December 13 telephone call to clarify that the sites are separate, NDI Lab operations and SWMUs identified at Building 185 and Building 593 were consolidated into new SWMU designation SWMU 21,	

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		Solid Waste Management Units/Areas of Concern (2006 Permit Modification). Information provided by the Permittee indicates that SWMU 21 is currently in use at its current location at Facility Building 593.		Building 185 Non-Destructive Inspection (NDI) Lab and SWMU 22, Building 593 Non-Destructive Inspection (NDI) Lab. NDI Lab Dip Tanks have been identified at former NDI Lab Building 185 and the Active NDI Lab at Building 593; therefore, the consolidated units will be addressed separately under new SWMU designations SWMU 21and SWMU 22. SWMU 21 and SWMU 22 will be placed on Table 1 of the Permit requiring corrective action.	
SWMUs 22a and 22b-NDI Lab Developer Tanks	2	Permittee comment information indicated SWMUs 22a and 22b, NDI Lab Developer Tanks, were process tanks, which did not manage waste. The Permittee indicated that developer solution maintained in the tank was removed every three months. The waste solution was then containerized and disposed by Air Force DPDO. No releases were reported for the SWMUs. The Permittee further indicated that any releases from the units would have collected at the building floor drains and would have been conveyed to SWMU 98. SWMU 98 was previously granted a corrective action complete without controls status. The Permittee recommended SWMUs 22a and 22b also be granted corrective action complete status and be moved to Permit Table 3. Additionally, the Permittee indicated that NMED concurred with a prior	14	The comment information did not provide sufficient evidence to support a SWMU status determination. Operations conducted at the NDI Lab appear to have resulted in the generation, storage, treatment, and disposal of various waste materials, including hazardous waste. RFA information indicates that SWMU 22b is located at Building 593. SWMU 22a was reported as located at Building 185, which has been demolished. The units managed photographic developing solution. Reported waste disposal from the tanks resulted in the release of approximately 220 gallons of photo developing solution to the sanitary sewer per year. No waste characterization information was provided by the Permittee. NDI Lab operations date back to at least 1965, which predates RCRA regulation governing the management, storage, treatment, and disposal of hazardous waste. Therefore, additional information is required to support the Permittee's conclusion that prior waste management practice did not result in a release to the environment. This must be substantiated by comprehensive historical use, process, waste characterization, and management records information. Currently, the limited information provided by the Permittee and available in the previously completed RFA has resulted in	No

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		USEPA no further action determination for SWMUs 22a and 22b which was documented in the 2006 Permit Modification. The Permittee indicated that SWMU 22b is currently in use.		a data gap, which must be resolved to the satisfaction of the NMED. Furthermore, NMED cannot make a status determination on a SWMU that is currently in use (i.e., SWMU 22b, Active Building 593Lab Developer Tank). The 2006 Permit Modification indicates that the prior SWMU 22a and 22b status determination was based solely on information provided in the RFA. NMED considers the information provided in the 1987 RFA to be outdated and insufficient for status determinations. Updated information is required for any further SWMU evaluation and status determination. As agreed to by NMED and the Permittee during meeting discussion on December 12, 2018, NDI Lab operations and SWMUs identified at Building 185 and Building 593 were consolidated into new unit designations SWMU 21, Building 185 Non-Destructive Inspection Lab and SWMU 22, Building 593 Non-Destructive Inspection Lab. NDI Lab Developer Tanks have been identified at former NDI Lab Building 185 and Active NDI Lab Building 593; therefore, the units (formerly identified as SWMU 22a and SWMU 22b) will be addressed separately under new unit designations SWMU 21 and SWMU 22. SWMU 21 and SWMU 22 will be placed on Table 1 of the Permit requiring corrective action.	
SWMUs 23a and23b-NDI Lab Emulsifier Processing Tanks	2	Permittee comment information indicated SWMUs 23a and 23b, NDI Lab Emulsifier Processing Tanks, did not manage waste. The Permittee indicated that emulsifier solution maintained in the tanks was removed	15	The comment information did not provide sufficient evidence to support a SWMU status determination. Operations conducted at the NDI Lab appear to have resulted in the generation, storage, treatment, and disposal of various waste materials, including hazardous waste. RFA information indicates that the NDI Lab Emulsifier Processing Tank is a	No

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		every three months. Upon removal, the solution would be classified as a waste. Prior to 1986 the generated waste was discharged to the sanitary sewer (SWMU 98). After 1986 the waste was containerized and disposed by Air Force DPDO. Releases were not reported from SWMUs 23a or 23b. The Permittee further indicated that any releases from the units would have collected at the building floor drains and then been conveyed to SWMU 98. SWMU 98 was previously granted a corrective action complete without controls status. The Permittee recommended SWMUs 23a and 23b also be granted corrective action complete status and be moved to Permit Table 3. Additionally, the Permittee indicated that NMED concurred with a prior USEPA no further action determination for SWMUs 23a and 23b which was documented in the 2006 Permit Modification. Information provided by the Permittee indicates that SWMU 23b is currently in use.		100-gallon stainless steel tank utilized for the storage of photographic emulsifier solution located at Building 593 (SWMU 23b). The tank was previously located in Building 185 (SWMU 23a). NDI Lab operations date back to at least 1965, which predates RCRA regulation governing the management, storage, treatment, and disposal of hazardous waste. Therefore, additional information is required to support the Permittee's conclusion that prior waste management practice did not result in a release to the environment. This must be substantiated by comprehensive historical use, process, and waste characterization and management records information. Currently, the limited information provided by the Permittee and available in the previously completed RFA has resulted in a data gap, which must be resolved to the satisfaction of the NMED. Furthermore, NMED cannot make a status determination on a SWMU that is currently in use (i.e., SWMU 23b, Active Lab Emulsifier Processing Tank). NMED's 2006 Permit Modification indicates that the prior SWMU 23a and SWMU 23b status determination was based solely on information provided in the RFA.NMED considers the information provided in the 1987 RFA to be outdated and insufficient for status determinations. Updated information is required for any further SWMU evaluation and status determination. As agreed to by NMED and the Permittee during meeting discussion on December 12, 2018, NDI Lab operations and SWMUs identified in Building 185 and Building 593 were consolidated into new unit designations SWMU 21, Building 185 Non-Destructive Inspection Lab and SWMU 22, Building 593 Non-Destructive Inspection Lab.	

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				NDI Lab Emulsifier Processing Tanks have been identified at former NDI Lab Building 185 and Active NDI Lab Building 593; therefore, the units (formerly identified as SWMU 23a and SWMU 23b) will be addressed separately under new unit designations SWMU 21 and SWMU 22. SWMU 21 and SWMU 22 will be placed on Table 1 of the Permit requiring corrective action.	
SWMUs 24a and24b-NDI Lab Silver Recovery Tanks	2	Permittee comment information indicated SWMUs 24a and 24b, NDI Lab Silver Recovery Tanks, were utilized to process waste fixer solution. The Permittee indicated that the units are exempt from regulation under 40 CFR 261.6. The regulatory exemption applies to recovery units utilized for the collection of precious metals for recycling. The Permittee indicated that RFA information did not identify any releases from SWMU 24a or SWMU 24b. The Permittee further indicated that any releases from the units would have collected at the building floor drains and then would have been conveyed to the sanitary sewer system (SWMU 98). SWMU 98 was previously granted a corrective action complete without controls status. The Permittee recommended SWMU 24a and SWMU 24b also be granted corrective action complete status and be moved to Permit Table 3. Additionally, the Permittee indicated	16	The comment information did not provide sufficient evidence to support a SWMU status determination. Operations conducted at the NDI Lab appear to have resulted in the generation, storage, treatment, and disposal of various waste materials, including hazardous waste. RFA information indicated that the NDI Lab Silver Recovery Tank was initially located at Building 185 (SWMU 24a). RFA information indicates that SWMU 24a was in operation from at least 1965 to sometime prior to 1986. During completion of the RFA, the NDI Lab Silver Recovery Tank was located at Building 593 (SWMU 24b). Waste management information provided in the RFA indicated that waste fixer solution generated monthly and processed for silver recovery totaled approximately 480 gallons per year. NDI Lab operations date back to at least 1965, which predates RCRA regulation governing the management, storage, treatment, and disposal of hazardous waste. Therefore, additional information is required to support the Permittee's conclusion that prior waste management practice did not result in a release to the environment. This must be substantiated by comprehensive historical use, process, waste characterization and management records information for SWMU 24a, SWMU24b, and the NDI Lab. Currently, the limited information provided by the Permittee and available in the previously completed RFA has resulted in a data gap,	No

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		that NMED concurred with a prior USEPA no further action determination for SWMUs 24a and 24b, which was documented in the 2006 Permit Modification. Information provided by the Permittee indicates that SWMU 24b is currently in use.		which must be resolved to the satisfaction of the NMED. Furthermore, NMED cannot make a status determination on a SWMU that is currently in use (i.e., SWMU 24b, Active Lab Silver Recovery Tank). NMED's 2006 Permit Modification indicates that the prior SWMU 24a and SWMU 24b status determination was based solely on information provided in the RFA. NMED considers the information provided in the 1987 RFA to be outdated and insufficient for status determinations. Updated information is required for any further SWMU evaluation and status determination. As agreed to by NMED and the Permittee during meeting discussion on December 12, 2018, NDI Lab operations and SWMUs identified in Building 185 and Building 593 were consolidated into new unit designations SWMU 21, Building 185 Non-Destructive Inspection Lab and SWMU 22, Building 593 Non-Destructive Inspection Lab. NDI Lab Silver Recovery Tanks have been identified at former NDI Lab Building 185 and Active NDI Lab Building 593; therefore, the units (formerly identified as SWMU 24a and SWMU 24b) will be addressed separately under new unit designations SWMU 21 and SWMU 22. SWMU 21 and SWMU 22 will be placed on Table 1 of the Permit requiring corrective action.	
SWMU 25 - NDI Lab Drum Storage Area	2	Permittee comment information indicated SWMU 25 was located within Building 185 and was no longer in use. The building was demolished in September 1996. The Permittee indicated that no releases from the	17	The comment information did not provide sufficient evidence to support a SWMU status determination. Operations conducted at the NDI Lab appear to have resulted in the generation, storage, treatment, and disposal of various waste materials, including hazardous waste. RFA information indicates that SWMU 25 was a storage area for waste	No

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		drum storage area were reported in the previously conducted RFA. The Permittee further indicated that any releases from the unit would have collected at the building floor drains and then would have been conveyed to the sanitary sewer system (SWMU 98). SWMU 98 was previously granted a corrective action complete without controls status. The Permittee recommended SWMU 25 also be granted corrective action complete status and be moved to Permit Table 3. Additionally, the Permittee indicated that NMED concurred with a prior USEPA no further action determination for SWMU 25 which was documented in the 2006 Permit Modification.		penetrant fluid utilized during aircraft parts inspection. The drum storage area was in use from 1967 to 1986. Waste penetrant utilized in the NDI Lab was reportedly transferred to 55-gallon drums located at SWMU 25. Approximately 220 gallons of waste penetrant solution were reportedly produced per year. RFA information indicated that waste penetrant was disposed at Facility fire training areas or landfills prior to 1975. From 1975 to 1986 the waste penetrant solution was transferred to SWMU 110, Underground Waste Oil Tank No. 2336. Details regarding release controls at SWMU 25 were not available at the time of the RFA. RFA information also indicated that the NDI Drum Storage Area was relocated to the Corrosion Control Shop Drum Storage Area (SWMU 40). SWMU 40 is currently on Facility Permit Table 2 and is currently in use as a drum storage area. NDI Lab operations date back to at least 1965, which predates RCRA regulation governing the management, storage, treatment, and disposal of hazardous waste. Therefore, additional information is required to support the Permittee's conclusion that prior waste management practice did not result in a release to the environment. This must be substantiated by comprehensive historical use, process, waste characterization and management records information. Currently, the limited information provided by the Permittee and available in the previously completed RFA has resulted in a data gap, which must be resolved to the satisfaction of the NMED. 2006 Permit Modification indicates that the prior SWMU 25 status determination was based solely on information provided in the RFA.NMED considers the information provided in the 1987 RFA to be outdated and insufficient for	

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				status determinations. Updated information is required for any further SWMU evaluation and status determination. As agreed to by NMED and the Permittee during meeting discussion on December 12, 2018, NDI Lab operations and SWMUs identified in Building 185 and Building 593 were consolidated into new unit designations SWMU 21, Building 185 Non-Destructive Inspection Lab and SWMU 22, Building 593 Non-Destructive Inspection Lab. The NDI Lab Drum Storage Area was located at former NDI Lab Building 185; therefore, the unit (formerly identified as SWMU 25) will be addressed separately under new unit designation SWMU 21. SWMU 21 will be placed on Table 1 of the Permit requiring corrective action.	
SWMU 26 - NDI Lab Fixer Processing Tank	2	Permittee comment indicated the SWMU 26, NDI Lab Fixer Processing Tank, was originally located in Building 185 prior to the 1996 building demolition. NDI Lab operations continued at Building 593. The Permittee indicated the currently utilized SWMU 26 NDI Lab Fixer Processing Tank is connected in series to a silver recovery tank (SWMU 24b). Therefore, the tank is not managing hazardous waste. The Permittee indicated that available RFA information did not identify any releases from SWMU 26. The Permittee further indicated that any releases from the unit would have collected at the building floor drains	18	The comment information did not provide sufficient evidence to support a status determination for SWMU 26. Operations conducted at the NDI Lab appear to have resulted in the generation, storage, treatment, and disposal of various waste materials, including hazardous waste. Use of SWMU 26 was reported to have begun in 1965 and continued to at least 1986 at Facility Building 185. At the time of the RFA, an additional fixer process tank for use at Building 593 was on order and appears to currently be in use. Available waste management information collected during completion of the RFA indicated that waste fixer solution generated monthly was sent to a silver recovery processor tank (SWMU 24a or 24b). The processed waste fixer solution was then reportedly discharged to the sanitary sewer. Recovered silver sludge collected in the silver recovery tank was sent to DPDO for offsite recycling or disposal. Approximately 480 gallons of waste fixer solution were reportedly generated per year at the	No

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		and then would have been conveyed to the sanitary sewer system (SWMU 98). SWMU 98 was previously granted a corrective action complete without controls status. The Permittee recommended SWMU 26 also be granted corrective action complete status and be moved to Permit Table 3. Additionally, the Permittee indicated that NMED concurred with a prior USEPA no further action determination for SWMU 26,which was documented in the 2006 Permit Modification. The NDI Lab Fixer Processing Tank was reported as currently in use.		NDI Lab. No waste characterization information was provided by the Permittee. NDI Lab operations date back to at least 1965, which predates RCRA regulation governing the management, storage, treatment, and disposal of hazardous waste. Therefore, additional information is required to support the Permittee's conclusion that prior waste management practice did not result in a release to the environment. This must be substantiated by comprehensive historical use, process, and waste characterization and management records information for SWMU 26 and the NDI Lab. Currently, the limited information provided by the Permittee and available in the previously completed RFA has resulted in a data gap, which must be resolved to the satisfaction of the NMED. Furthermore, NMED cannot make a status determination on a SWMU that is currently in use (i.e., Active Building 593 NDI Lab Fixer Process Tank). NMED's 2006 Permit Modification indicates that the prior SWMU 26 status determination was based solely on information provided in the RFA. NMED considers the information provided in the 1987 RFA to be outdated and insufficient for status determinations. Updated information is required for any further SWMU evaluation and status determination. As agreed to by NMED and the Permittee during meeting discussion on December 12, 2018, NDI Lab operations and SWMUs identified at Building 185 and Building 593 were consolidated into new SWMU designation SWMU 21, Building 185 Non-Destructive Inspection (NDI) Lab and SWMU 22, Building 593 Non-Destructive Inspection (NDI) Lab.	

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				NDI Lab Fixer Processing Tanks have been identified at former NDI Lab Building 185 and the Active NDI Lab at Building 593; therefore, the units will be addressed separately under new SWMU designations SWMU 21 and SWMU 22. SWMU 21 and SWMU 22 will be placed on Table 1 of the Permit requiring corrective action.	
SWMU 27 - Lead Acid Battery Shop Neutralization Tank	2	Permittee comment information indicated that the SWMU 27, Lead Acid Battery Shop Neutralization Tank, was located at Building 185. SWMU 27 was a polyethylene tank utilized to neutralize the sulfuric acid contained in lead-acid batteries. No releases were reported from the neutralization tank. The Permittee further indicated that any releases from the unit would have collected at the building floor drains, which would have then been conveyed to SWMU 98. SWMU 98 was previously granted a corrective action complete without controls status. The Permittee requested SWMU 27 also be granted corrective action complete status and be moved to Permit Table 3. Additionally, the Permittee indicated that NMED concurred with a prior USEPA no further action determination for SWMU 27 as documented in the 2006 Permit Modification.	19	The comment information did not provide sufficient evidence to support a SWMU status determination. Operations conducted at the NDI Lab appear to have resulted in the generation, storage, treatment, and disposal of various waste materials, including hazardous waste. Based on available RFA information, lead acid battery neutralization operations at the Facility date back to at least 1943. Acid battery neutralization likely began in 1965 and continued to at least 1986 at Building 185. Sulfuric acid was reportedly neutralized at the tank with sodium bicarbonate and the treated solution discharged periodically to the sanitary sewer. Approximately 15 to 20 batteries were processed monthly, which produced approximately 300 gallons of processed acid solution per year. Lead-acid battery neutralization operations at Building 185 likely date back to at least 1965, which predates RCRA regulation governing the management, storage, treatment, and disposal of hazardous waste. Therefore, additional information is required to support the Permittee's conclusion that prior waste treatment and management practice did not resulted in a release to the environment. This must be substantiated by comprehensive historical use, process, and waste characterization and management records information. Currently, limited information provided by the Permittee and available in the previously completed RFA has resulted in a	No

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				data gap, which must be resolved to the satisfaction of the NMED. NMED's 2006 Permit Modification indicates that the prior SWMU 27 status determination was based solely on information provided in the RFA. NMED considers the information provided in the RFA to be outdated and insufficient for status determinations. Updated information is required for any further SWMU evaluation and status determination. As agreed to by NMED and the Permittee during meeting discussion on December 12, 2018, NDI Lab operations and SWMUs identified in Building 185 and Building 593 were consolidated into new unit designations SWMU 21, Building 185 Non-Destructive Inspection Lab and SWMU 22, Building 593 Non-Destructive Inspection Lab. The NDI Lab Lead Acid Battery Shop Neutralization Tank was located at former NDI Lab Building 185; therefore, the unit (formerly identified as SWMU 27) will be addressed under new unit designation SWMU 21. SWMU 21 will be placed on Table 1 of the Permit requiring corrective action.	
SWMU 28 - Used Battery Casing Storage Area	2	Permittee comment information indicated that the SWMU 28 Used Battery Casing Storage Area, was located at Building 185. The storage area was reported as an area with plywood walls and a concrete floor. Lead acid battery casings were reported stored on a wooden topped metal framed table within the room. Treatment or disposal of batteries was	20	The comment information did not provide sufficient evidence to support a SWMU status determination. Facility operations conducted at Building 185 appear to have resulted in the generation, storage, and disposal of various waste materials, including hazardous waste. During the 1987 RFA, SWMU 28 was utilized for the storage of Nickel-Cadmium (NiCad) batteries. Information on prior lead-acid battery storage at Building 185 was not available during finalization of the RFA. NiCad batteries were stored in this area prior to being sent to DPDO for disposal on a semi-annual schedule.	No

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		not identified in association with the storage area. No releases were reported in association with the battery storage area. The Permittee further indicated that any releases from the unit would have collected at the building floor drains, which would then have been conveyed to the sanitary sewer system (SWMU 98). SWMU 98 was previously granted a corrective action complete without controls status. The Permittee recommended SWMU 28 also be granted corrective action complete status and be moved to Facility Permit Table 3. Additionally, the Permittee indicated that NMED concurred with a prior USEPA no further action determination for SWMU 28 which was documented in the 2006 Permit Modification.		Used battery storage operations at Building 185 likely date back to at least 1965, which predates RCRA regulation governing the management, storage, treatment, and disposal of hazardous waste. Therefore, additional information is required to support the Permittee's conclusion that prior waste management practice did not result in a release to the environment. This must be substantiated by comprehensive historical use, process, waste characterization and managementrecords information for SWMU 28. Currently, limited information provided by the Permittee and available in the previously completed RFA has resulted in a data gap, which must be resolved to the satisfaction of the NMED. NMED's 2006 Permit Modification indicates that the SWMU 28 status determination was based solely on information provided in the RFA. NMED considers the information provided in the 1987 RFA to be outdated and insufficient for status determinations. Updated information is required for any further SWMU evaluation and status determination. As agreed to by NMED and the Permittee during meeting discussion on December 12, 2018, NDI Lab operations and SWMUs identified in Building 185 and Building 593 were consolidated into new unit designations SWMU 21, Building 185 Non-Destructive Inspection Lab and SWMU 22, Building 593 Non-Destructive Inspection Lab. The Lead Acid Battery Shop Neutralization Tank was located at former NDI Lab Building 185; therefore, the unit (formerly identified as SWMU 28) will be addressed separately under new unit designation SWMU 21. SWMU 21 will be placed on Table 1 of the Permit requiring corrective action.	

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SWMU 29 - NiCad Battery Rinse Sink	2	Permittee comment information indicated that the SWMU 29, NiCad Battery Rinse Sink, collected possible nickel and cadmium impacted rinse water from a battery preparation area located in Building 185. Building 185 was demolished in 1996. No releases were reported in association with SWMU 29. The Permittee further indicated that any releases from the unit would have collected at the building floor drains, which would then have been conveyed to the sanitary sewer system (SWMU 98). SWMU 98 was previously granted a corrective action complete without controls status. The Permittee recommended the unit also be granted corrective action complete status and be moved to Permit Table 3. Additionally, the Permittee indicated that NMED concurred with a prior USEPA no further action determination for SWMU 29 which was documented in the 2006 Permit Modification.	21	The comment information did not provide sufficient evidence to support a SWMU status determination. Facility operations conducted at Buildings 185 appear to have resulted in the generation, storage, and disposal of various waste materials, including hazardous waste. Rinse water containing hazardous constituents (nickel and cadmium) were released at the sink, which was then discharged to the SWMU 98 sanitary sewer. First use of SWMU 29 dates to October 1986. Release history was not available in the RFA information. NDI Lab operations and other waste storage operations at Building 185 date back to at least 1965, which predates RCRA regulation governing the management, storage, treatment, and disposal of hazardous waste. Therefore, additional information is required to support the Permittee's conclusion that prior waste management practices did not result in a release of hazardous constituents to the environment. This must be substantiated by comprehensive historical use, process, and waste characterization and management records information. Currently, the limited information provided by the Permittee and available in the previously completed RFA has resulted in a data gap, which must be resolved to the satisfaction of the NMED. NMED's 2006 Permit Modification indicates that the prior SWMU 29 status determination was based solely on information provided in the RFA. NMED considers the information provided in the RFA to be outdated and insufficient for status determinations. Updated information is required for any further SWMU evaluation and status determination. As agreed to by NMED and the Permittee during meeting discussion on December 12, 2018, NDI Lab operations and	No

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				SWMUs identified in Building 185 and Building 593 were consolidated into new unit designations SWMU 21, Building 185 Non-Destructive Inspection Lab and SWMU 22, Building 593 Non-Destructive Inspection Lab. The NiCad Battery Rinse Sink was located at former NDI Lab Building 185; therefore, the unit (formerly identified as SWMU 29) will be addressed under new unit designation SWMU 21. SWMU 21 will be placed on Table 1 of the Permit requiring corrective action.	
SWMU 30 - AGE Maintenance Shop Wash Rack	2	Permittee comment information indicated that SWMU 30, AGE Maintenance Shop Wash Rack was utilized for aircraft ground equipment cleaning. The SWMU was located near Building 185. The Permittee indicated that the wash rack discharged to SMWU 1, Oil Water Separator (OWS) No. 119 which was previously granted a Corrective Action Complete without Controls status. The Permittee also indicated that NMED previously concurred with a USEPA no further action determination for SWMU 30. Therefore, the Permittee requested SWMU 30 be moved to Facility Permit Table 3.	22	The comment information did not provide sufficient evidence to support a SWMU status determination. Facility operations conducted at Building 185 appear to have resulted in the generation, storage, and disposal of various waste materials, including hazardous waste. Available RFA information indicated that SWMU 30 was a 50-foot by 30-foot sloped concrete pad that discharged to two drains, which then discharged to OWS No. 119. The OWS effluent then drained to SWMU 98. Use of the wash rack dates to back to at least 1943. OWS No. 119 was reportedly installed in 1963 and was in operation to at least 1996.SWMU 30 reportedly generated approximately 2,640 gallons of aircraft cleaning compound and PD-680 (Type II) solvent annually, which likely contained hazardous constituents. Additional information is required to support the Permittee's conclusion that prior waste disposal practice at SWMU 30 did not result in a release to the environment. Available historical information indicates that solvents were reportedly utilized and disposed at the unit along with wash water during equipment cleaning operations. Any further request for a status determination must be substantiated by comprehensive site history, use, process, waste characterization, management,	No

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				and disposal information. Of particular concern is waste effluent disposal prior to 1963. Currently, the limited information provided by the Permittee and available in the previously completed RFA has resulted in a data gap, which must be resolved to the satisfaction of the NMED. NMED's 2006 Permit Modification indicates that the prior SWMU 30 status determination was based solely on information provided in the RFA. NMED considers the information provided in the 1987 RFA to be outdated and insufficient for status determinations. Updated information is required for any further SWMU evaluation and status determination. SWMU 30, AGE Maintenance Shop Wash Rack, will be retained on Permit Table 1 pending the submittal of additional information and/or investigation.	
SWMU 36 - Former Morale, Welfare, and Recreation (MWR) Auto Body Shop	2	Permittee comment information was provided for the 110-gallon Former MWR Dip Tank (SWMU 36b) utilized for cleaning aircraft wheels at Building 194. The comment did not provide any information relevant to SWMU 36, Former MWR Auto Body Shop as listed in Permit Table 1. SWMU 36 was designated as an additional SWMU during the corrective action status determination for SWMU 36a, Former MWR Auto Body Shop Disposal Pit and is documented in NMED's May 31, 2017 *Fact Sheet/Statement of Basis, Request for Corrective Action Complete Status*	23	NMED's designation of SWMU 36 was intended to define an additional unit, which accounted for historical and current operations at the Former MWR Auto Body Shop building (Building 214). The information provided in the Permittee's comment for the Wheel and Tire Shop Dip Tank (SWMU 36b) is not relevant to SWMU 36 as currently listed in Permit Table 1. For clarity, the Wheel and Tire Shop Dip Tank has been designated SWMU 36b on Permit Table 2 with a Corrective Action Complete with Controls status. SWMU 36a corresponds to the Former MWR Auto Body Shop Disposal Pit only. SWMU 36a is currently listed on Facility Permit Table 3 with a Corrective Action Complete without Controls status. Detailed site history information is required for SWMU 36. The required additional information must include, but is not	No

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		for Six Solid Waste Management Units.		limited to, a complete site use history for Building 214; information regarding auto body shop maintenance operations conducted at the site, which resulted in the generation, storage and disposal of hazardous waste or hazardous constituents; and any information pertaining to building components such as aboveground and underground storage tanks, OWSs and associated leach fields, floor drains, hydraulic lifts, and waste storage areas in association with prior and current building usage. SWMU 36, MWR Auto Body Shop, will be retained on Permit Table 1 pending the submittal of additional information and investigation.	
SWMU 64 - Civil Engineering Open Yard polychlorinated biphenyl (PCB)Storage	2	Permittee comment information indicated that the initial construction and location of the Civil Engineering Yard PCB Storage Area was unknown. The unit was utilized for the storage of out of service transformers. The Permittee indicated that use of the area was discontinued when a PCB transformer storage building was constructed in 1981. Prior to 1978, transformers were salvaged for reuse. After 1978 transformers were sent to DPDO for disposal. Despite the reported unknown location of SWMU 64, the Permittee indicated that no releases were reported in association with the PCB storage area. The Permittee additionally indicated that NMED had previously concurred with a prior USEPA no further action	24	The comment information did not provide sufficient evidence to support a status determination. The Permittee must conduct further investigation to identify the locations of the former Civil Engineering Yard PCB Storage Area and reported storage building. The Permittee must provide NMED with evidence of further investigation. The investigation must be substantiated by comprehensive site history, use, process, waste characterization, management, and disposal information. Currently, the limited information provided by the Permittee and available in the previously completed RFA has resulted in a data gap, which must be resolved to the satisfaction of the NMED. NMED's 2006 Permit Modification indicates that the prior SWMU 64 status determination was based solely on information provided in the RFA. NMED considers the information provided in the RFA to be outdated and insufficient for status determinations.	No

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		determination for SWMU 64 and requested the unit be listed on Facility Permit Table 3.		SWMU 64, Civil Engineering Open Yard PCB Storage, will be retained on Permit Table 1 pending the submittal of additional information and investigation.	
SWMU 65 - Former Interim Status Hazardous Waste Storage Facility	2	Permittee comment information indicated that the unit consisted of a fenced area on a concrete pad surrounded by a 6-inch berm. The area was utilized for temporary storage of hazardous waste generated across the Facility. Use of the interim storage area ended in 1983. The Permittee additionally indicated that NMED had previously concurred with a prior USEPA no further action determination for SWMU 65 and requested the unit be listed on Permit Table 3	25	The comment information did not provide sufficient evidence to support a status determination. Available RFA information indicates that SWMU 65 was an outdoor RCRA regulated hazardous waste storage area located at Facility Area 304. The hazardous waste storage area totaled 1,000 square feet and was equipped with secondary containment (berms). RFA information indicated that hazardous waste storage at SWMU 65 actually began in 1983 and continued until December 1985. Reported hazardous waste storage at the area included corrosive waste (Hazardous Waste Code D002) totaling 18,000 pounds per year (lb/yr), chromium waste (D007) totaling 3,000 lb/yr, spent halogenated solvents (F002) totaling 5,500 lb/yr, and spent non-halogenated solvents (F005) totaling 46,000 lb/yr. Closure plan documentation was not available during finalization of the RFA and there is no evidence that closure activities other than waste removal were conducted at SWMU 65. Any further request for a status determination must also be substantiated by comprehensive site history, location, use, process, waste characterization and management, and any disposal activity information for the hazardous waste storage area. Currently, the limited information provided by the Permittee and available in the previously completed RFA has resulted in a data gap, which must be resolved to the satisfaction of the NMED. NMED's 2006 Permit Modification indicates that the prior SWMU 65 status determination was based solely on information provided in the RFA. NMED considers the	No

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				information provided in the RFA to be outdated and insufficient for status determinations. Updated information is required for any further SWMU evaluation and status determination. SWMU 65, Former Interim Status Hazardous Waste Storage Area, will be retained on Facility Permit Table 1 pending the submittal of additional information or investigation of the former hazardous waste storage area.	
AOC ZZ-NSAv Maintenance Hangar Building No. 133	3	Permittee comment information indicated that AOC ZZ, NSAv Maintenance Hangar, Building No. 133, was utilized as a drone aircraft maintenance hangar. The Permittee indicated that the building was currently empty. Two hazardous waste accumulation areas were reported at the hangar facility, which were closed on June 21, 2017.	26	AOC ZZ, NSAv Maintenance Hangar Building No. 133 was noted during NMED's review of the Facility *Installation Development Plan* provided to NMED on August 5, 2016. According to the information, Building 133 was listed as a facility potentially slated for demolition or repurposing. Therefore, it is appropriate to gather additional information regarding any previously unaccounted for SWMUs or AOCs prior to building demolition or repurposing. NSAv Maintenance Hangar operations were not conducted when the Facility RFA was completed in 1987. Permittee comment information indicates hazardous waste generation and accumulation did occur at the maintenance hangar; therefore, SWMUs or AOCs may be present at the site. Permittee comment information did not provide sufficient evidence for NMED to make any further determination on the site. Therefore, AOC ZZ will be retained on Permit Table 1 pending the submittal of additional comprehensive NSAv Maintenance Hangar operations process history information. This additional information must include all details pertaining to any parts washers, ASTs, USTs, OWS, leach fields, grease traps, hazardous waste storage and accumulation areas; all information pertaining to the dimensions, capacities, and structural description for each unit; specifications of all hazardous waste, waste containing hazardous constituents, or	No

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				other waste generated at the hangar; and all available information pertaining to the release of hazardous waste, hazardous constituents, solid waste, or other substances for the complete operational history of the maintenance hangar or building.	
AOC AAA-HAZ-Mat Storage Building No. 202	3	Permittee comment information indicated that AOC AAA, Haz-Mat Storage Building No. 202, was utilized to store new batteries and aircraft parts. The Permittee indicated that the Building was unoccupied and is slated for demolition.	27	AOC AAA, HAZ-Mat Building No. 202, was noted during NMED's review of the Facility *Installation Development Plan* provided to NMED on August 5, 2016. The Permittee has indicated Building 202 is slated for demolition. Therefore, NMED believes it is appropriate to gather additional information regarding any previously unaccounted for SWMUs or AOCs prior to building demolition. Building 202 appears to have not been operational or was not considered during finalization of the RFA in 1987. Permittee comment information did not provide sufficient evidence for NMED to make any further determination on the site. Additionally, the provided building use information does not appear to match the building use description. AOC AAA will be retained on Permit Table 1 pending submittal of additional information related to hazardous waste generation, storage, and accumulation at Building 202, such as paint, paint thinners, solvents, cleaning solutions, and any associated waste, potential waste materials, or other products stored at the building.	No
AOC BBB-Explosives Ordinance Disposal (EOD) Building No. 130	3	Permittee comment information indicated that AOC BBB, EOD Building No. 130, was utilized as office space for EOD staff. The Permittee indicated that no work on or with explosives was conducted at Building 130. Explosives were also not stored at the building.	28	AOC BBB, EOD Building No. 130, was noted during NMED's review of the Facility *Installation Development Plan* provided to NMED on August 5, 2016. Based on the reported Facility building use information provided by the Permittee, AOC BBB will be removed from the Facility Permit.	Yes

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AOC CCC-Corrosion Control Hangar, Building No. 199	3	Permittee comment information indicated that operations at AOC CCC, Corrosion Control Hangar at Building No. 199, ceased approximately four to five years ago. The building is slated for renovation and repurposing. The Permittee indicated that the former paint booth and associated ductwork was remediated in 2016 prior to recycling of the removed paint booth components.	29	AOC CCC, Former Corrosion Control Hangar at Building No. 199, was noted during NMED's review of the Facility *Installation Development Plan* provided to NMED on August 5, 2016. Building 199 was listed as a facility slated for demolition or repurposing. Therefore, it is appropriate to gather additional information regarding any SWMUs or AOCs prior to building demolition or further reconfiguration. The Facility building does not appear to have been operational or was not considered when the Facility RFA was conducted in 1987. Additionally, Permittee comment information did not provide sufficient evidence for NMED to make any further determination on the site. AOC CCC will be retained on Permit Table 1 pending submittal of additional detailed information related to key building components such as paint booths (existing or previously existing), wash racks, cleaning compound bulk storage tanks, parts washers, ASTs, USTs, OWS, waste treatment and collection systems, paint mixing rooms, and hazardous or solid waste storage and accumulation areas not previously accounted for in RFA information or the provided comment information.	No
AOC DDD-Vehicle Maintenance Facility No. 335	3	Permittee comment information indicated that AOC DDD, Vehicle Maintenance Shop at Building No. 199, performs vehicle lubing maintenance operations. The Permittee indicated that the maintenance facility accumulated waste gasoline filters for disposal.	30	AOC DDD, Vehicle Maintenance Building, Building No. 335, was noted during NMED's review of the Facility *Installation Development Plan* provided to NMED on August 5, 2016. Building 335 was listed as a facility slated for demolition or repurposing. Therefore, NMED believes it is appropriate to gather additional information regarding any SWMUs or AOCs prior to building demolition or reconfiguration. Building No. 335 does not appear to have been operational or was not considered during implementation of the RFA. There are concerns with this site regarding hazardous waste generation and any associated	No

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				SWMUs such as parts washers, ASTs, USTs, OWS, grease traps, and hazardous waste accumulation and storage areas not previously documented during the RFA. Additionally, the Permittee comment information did not provide sufficient evidence for NMED to make any further determination on the site; therefore, AOC DDD will be retained on Permit Table 1 pending submittal of additional information.	
AOC EEE-Vehicle Maintenance Facility No. 379	3	Permittee comment information indicated that AOC EEE, Vehicle Maintenance facility at Building 379, is utilized for heavy vehicle maintenance operations. SWMU 53, Special Vehicle Maintenance Shop Floor Drains, and SWMU 57, OWS No. 379, were previously identified at this site. The Permittee indicated that the maintenance facility stored used oil and antifreeze generated in association with maintenance activities.	31	The vehicle maintenance facility at Building 379 was previously identified as the Special Purpose Vehicle Maintenance Shop in the RFA. The vehicle maintenance building also was noted during NMED's review of the Facility *Installation Development Plan* provided to NMED on August 5, 2016. Building 379 was listed as a facility slated for demolition or repurposing. Therefore, it is appropriate to gather additional information regarding any previously identified SWMUs and any newly unidentified units prior to building demolition or repurposing. The 1987 RFA identified at least seven SWMUs at Building 379. The identified units included SWMU 53, SWMU 57, SWMU 52- Waste Oil and Hydraulic Fluid Bowser, SWMU 54- Special Purpose Vehicle Maintenance Shop Drum Storage Area, SWMU 55- Lead-Acid Battery Accumulation Point, SWMU 56- Lead-Acid Battery Storage Area, and SWMU 58 - Special Purpose Vehicle Maintenance Shop PD-680 Dip Tank. However, the RFA information is outdated. NMED's concerns with this site are with hazardous waste generation and any associated SWMUs such as parts washers, ASTs, USTs, OWS, grease traps, and hazardous and solid waste accumulation and storage areas not previously accounted for in RFA information. Therefore, AOC EEE will be retained on Permit Table 1 pending submittal of additional updated information.	No

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AOC FFF-Munitions Wash Rack, Facility No. 2153	3	Permittee comment information indicated that AOC FFF, Munitions Wash Rack Facility No. 2153, was a munitions wash rack. The wash rack was reported as a self-contained recirculating system that did not drain to the environment. The Permittee indicated that the unit was no longer in use and the pump house had been removed. Photographic information provided with comment indicated that the drain and pumphouse foundation were located at the western end of the wash rack.	32	AOC FFF, Munitions Wash Rack, Facility No. 2153, was noted during NMED's review of the Facility *Installation Development Plan* provided to NMED on August 5, 2016. Facility No. 2153 was listed as a facility slated for demolition or repurposing. Therefore, it is appropriate to gather additional information prior to demolition or reconfiguration of the site. The wash pad appears to have not been operational or was not considered when the RFA was conducted in 1987. Wash pad operation processes likely generated hazardous waste or waste containing hazardous constituents. Permittee- provided information indicates the wash rack collected and stored wastewater associated with Facility munitions operations. The Permittee's comment information did not provide sufficient evidence or detail for NMED to make any further determination on the site. Therefore, AOC FFF will be retained on Permit Table 1 pending the submittal of comprehensive wash rack history and process information. This must include all information pertaining to the dimensions, capacities, and structural and mechanical description for the unit and all available information pertaining to the generation of waste wash water or other wastes at the site.	No
AOC GGG-98 Acre Munitions Storage Area	3	Permittee comment information indicated that AOC GGG, Munitions Storage Area, was comprised of 98acres. The Permittee indicated that the munitions storage only generated universal waste consisting of aerosol cans. The Permittee indicated that any military munitions related release would be addressed under the Facility's Military Munitions Response Program (MMRP).	33	AOC GGG, Munitions Storage Area was noted during NMED's review of the Facility *Installation Development Plan* provided to NMED on August 5, 2016. The Munitions Storage Area is currently located at the northeastern portion of the Facility and is potentially slated for relocation, with potential for decommissioning or repurposing of the storage area. Therefore, it is appropriate to gather additional information prior to demolition or reconfiguration of the area. NMED's current concerns with this site are with unaccounted-for storage, treatment, and disposal areas associated with abandoned, discarded, deteriorating, or	No

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				damaged munitions, as well as any other operations associated with munitions such as hazardous or solid waste generation, management, and storage areas such as wash pads, loading facilities, and any storage bunkers, magazines, or igloos slated for decommissioning or demolition. AOC GGG will be retained on Permit Table 1 pending additional information. It must also be noted that any current or prior storage, treatment, and disposal of abandoned, discarded, deteriorating, or damaged military munitions are subject to regulation under RCRA. Additionally, any release associated with the munitions storage area and associated functional areas are subject to investigation and cleanup under the Facility Permit.	
AOC HHH, Operational POL/Liquid Fuel Dispensing Systems	3	Permittee comment information indicated that AOC HHH, POL/Liquid Fuel Systems, was the location of SWMUs 71- Recovered Jet Propellant (JP)-4 Fuel Tank No. 390, SWMU 72-Oil Water Separator No. 390, SWMU 76-Sludge Weathering Pit and AOC Z*-POL Storage Tank No. 394 (420,000-gallon AST), AOC AA*-POL Storage Tank No. 395 (840,000-gallon AST), and AOC BB*-POL Storage Tank No. 396 (840,000-gallon AST). The Permittee indicated that any concerns would be covered by these previously defined AOCs. The Permittee indicated that the area needed to be more clearly defined, if another AOC was to be added to the Facility Permit.	34	AOC HHH, POL/Liquid Fuels Dispensing System, was noted during NMED's review of the Facility *Installation Development Plan* (Development Plan) provided to NMED on August 5, 2016. Table 3.4, Installation Capacity Opportunities of the Development Plan indicated that the current POL Fuel Systems space, facilities, acreage, and/or remaining system capacity were inadequate to meet the current Facility mission needs and could not accommodate expansion. Therefore, NMED deemed it appropriate to gather additional information prior to closure of the area. NMED's designation of AOC HHH was intended to ensure all exiting large capacity bulk fueling system storage and associated dispenser components such as any currently existing dispenser systems for jet fuel, diesel, gasoline, lubricants, and oil were accounted for on the Facility Permit. AOC HHH will remain on Table 1 of the Facility Permit as "Operational POL/Liquid Fuel Dispensing Systems". Additional information is required for any currently operational fuel and lubricant dispensing systems and	No

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				associated components such as fuel conveyance piping, oil water separators, fuel dispensing areas, unaccounted for fuel storage tanks, drains, spill containment structures, and waste collection and storage areas or units utilized for current Facility mission operations. SWM 71 and SWMU 72 were addressed during prior NMED status determination evaluation completed in 2016 and 2015, respectively. As a result, SWMU 71 and SWMU 72 are listed on Table 3. SWMU 76 will be listed on Table 3 based on a NMED status determination evaluation completed in 2006. Bulk Fuel Storage Tanks AOC AA*, AOC BB*, and AOC Z* will be retained on Table 2 of the Permit.	
AOC III, Vehicle Maintenance Facility No. 375	3	Permittee comment information indicated that AOC III, Vehicle Maintenance Facility, was the site of SWMU 51, Oil Water Separator No. 375. The Permittee indicated that the maintenance facility is a general purpose civilian type vehicle maintenance facility. The maintenance facility currently stores used oil and antifreeze at designated accumulation areas in association with vehicle maintenance operations.	35	AOC III, Vehicle Maintenance Facility No. 375, was noted during NMED's review of the Facility *Installation Development Plan* provided to NMED on August 5, 2016. Facility No. 375 was listed as a facility slated for demolition or repurposing. Based on the Permittee-provided information, a previous inspection of Building 375 identified SWMU 51, which was documented in the RFA. NMED currently requires additional updated information regarding Building 375 operations. NMED's concerns with Maintenance Facility 375 are with hazardous and solid waste generation and any associated SWMUs not previously identified, such as ASTs, USTs, additional OWS, grease traps, hazardous and solid waste accumulation and storage areas, and other maintenance facility components such as parts washers where hazardous waste may be generated which were not previously accounted for in the RFA information. Therefore, AOC III will be retained on Permit Table 1 pending submittal of additional information and potential investigation.	No

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AOC JJJ, Active Fire Training Area and Adjacent Ponding Area	3	Permittee comment information indicated that AOC JJJ, Active Fire Training Area and Adjacent Ponding Area, is lined to prevent releasing fire training materials to the soil.	36	The Active Fire Training Area (AFTA) was previously identified in the July 2017 *Final Installation-Specific Work Plan Cannon Air Force Base, NM, Site Inspection of Aqueous Film Forming Foam (AFFF) Release Areas Environmental Programs Worldwide* (AFFF Investigation Work Plan) document previously submitted and retained in NMED's Facility record. The AFFF Investigation Work Plan described the AFTA as located in the southeast portion of the installation immediately northwest of FTA-07, FTA-08, and FTA-04. The AFTA consists of a circular lined burn pit with a mockup of a large aircraft. Associated site components include a propane fuel tank, control panel, and lined evaporation pond. Prior repair activities and overflow events associated with the evaporation pond were noted in the AFFF Investigation Work Plan. The Work Plan information indicated that evaporation ponding area integrity issues and overflow events likely resulted in the release of AFFF to the environment, which may have contained constituents such as perflorooctonic acid, perfluorooctane sulfonate, and other associated firefighting agents. Based on the nature of the active AFTA area, the reported release in association with the AFTA, and the potential for the release of contamination to the environment as documented at other fire training areas, AOC JJJ, Active Fire Training Area and Adjacent Ponding Area will be retained on Permit Table 1.	No
AOC KKK, Various Berm, Concrete Pad Structures, and Pits	3	Permittee comment information indicated that AOC KKK contained foundations for temporary buildings that were removed starting in the mid-1990s. The Shallow trenches (approximately 6 inches deep) and one Hensco barrier structure were utilized for military training exercises. The	37	AOC KKK was identified during review of available aerial photographs. Based on the reported area use information provided by the Permittee, the berm and pit structures use has been defined. However, additional complete site use and detailed military training information is required before any further determination is made. Therefore, AOC KKK will be retained on Permit Table 1.	No

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		trenches were bunkers that were about 2 feet deep and covered with plywood and sand bags. The Permittee indicated the bunkers were demolished resulting in the plywood covers being removed and the sandbags being bulldozed into the trenches to level them out. Several transformers were located to the south of the area on raised berms to prevent inundation during flooding caused by rain events.			
AOC LLL, Various Berm, Concrete Pad Structures, and Pits	3	The Permittee indicated that AOC LLL, Various Berm, Concrete Pad Structures, and Pits, could not be differentiated from each other based on the provided description.	38	The listed description for AOC LLL as Various Berm, Concrete Pad Structures, and Pits is an error on draft Permit Table 1. The intended listing for AOC LLL was "Two ASTs at Northwest Portion of New Southeast Hangar Area." Based on the reported use information provided by the Permittee, AOC LLL will be removed from the Facility Permit.	Yes
AOC MMM, ASTs at C-130 Hangar Facility	3	The Permittee indicated that the storage tanks identified as AOC MMM were utilized for storage of water for firefighting at the Facility C-130 Aircraft Hangar ramp.	39	AOC MMM was identified during review of readily available aerial photographic information. The AOC is comprised of two ASTs observed at the northwest end of the C-130 Aircraft Hangar and two ASTs observed at the southeast end of the hangar. Based on the reported use information provided by the Permittee, AOC MMM will be removed from the Facility Permit.	Yes
AOC NNN, Hot Gun Berm at Taxiway F	3	The Permittee indicated that AOC NNN is a hot gun berm. The berm was intended as a safety stop for aircraft with jammed guns. The Permittee indicated that the berm has never been utilized for its intended purpose.	40	AOC NNN, Hot Gun Berm was noted during review of available aerial photographic information. Permittee-provided information has confirmed the use of the identified berm structure at Taxiway F as an unused facility safety structure. Based on the information provided, AOC NNN will be removed from the Facility Permit.	Yes

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AOC OOO, C-130 Aircraft Hangar/ Maintenance Facility (Buildings 4605, 4606, 4607, 4608, 4609, and 4610)	3	The Permittee indicated that AOC OOO is a maintenance hangar for C-130 aircraft. The Permittee indicated that waste accumulation points were primarily located in the new corrosion control hangar and structural maintenance hangar. The Permittee indicated that the hangar facility was extremely large with many diverse activities. The Permittee did not agree with the designation of an entire flight hangar as an AOC. All hazardous waste streams generated from this area were managed under the Facility hazardous waste management program, which the Permittee indicated met all necessary requirements for control of hazardous waste or materials for protection of human health and the environment.	41	AOC OOO, C-130 aircraft hangar and maintenance facility, comprised of Buildings 4605, 4606, 4607, 4608, 4609, and 4610 was noted during NMED's review of the Facility *Installation Development Plan* provided to NMED on August 5, 2016. AOC OOO is a newly constructed hangar facility and was not operational when the RFA was conducted in 1987. NMED's concerns with the aircraft hangar site are with any aircraft maintenance, corrosion control, or other operations and associated processes, which result in the generation of hazardous waste or waste containing hazardous constituents. Therefore, additional information is required to identify all potential SWMUs utilized during aircraft maintenance, corrosion control, and other operations such as ASTs, USTs, floor drains, ponding areas, OWS, grease traps, paint booths, wash racks, cleaning compound bulk storage tanks, waste treatment and collection systems, paint mixing rooms, units such as parts washers which have the potential to generate hazardous waste, and any hazardous or solid waste storage or accumulation areas. Permittee comment information did not provide sufficient evidence for NMED to make any further determination on the hangar site. Therefore, AOC OOO will be retained on Permit Table 1 pending submittal of additional information.	No
AOC CC*- Petroleum, Oil, and Lubricant (POL) Storage Tank No. 420	4	The Permittee provided a synopsis of various storage tank information from two documents in the Permittee's Facility record as well as excerpted RFA information. Attached document information included an Appendix F, Inventory of Existing POL Storage Tanks document (Appendix F Inventory), and a Department of the Air Force memorandum referenced as	42	Permittee comment information did not provide adequate supporting evidence for a status determination. Pertinent information regarding specific tank location information, date of removal, tank removal documentation records, confirmation sample, and sample analysis results were not provided. The absence of this information constitutes a data gap requiring further investigation. AOC CC* will remain on Permit Table 1 pending investigation at the storage tank location or additional conclusive information.	No

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		Registration of UST for 1989 (1989 Memorandum). AOC CC*, POL Storage Tank No. 420, has been identified as a 2,500-gallon steel JP-4 fuel underground storage tank (UST) located at the maintenance shop area near Facility Building 420. RFA information collected in 1987 indicated that the tank had no history of a release. Provided Appendix F Inventory information indicated that the storage tank was not originally included in the facility record. The 1989 Memorandum provided tank status information for eight Facility storage tanks. The memorandum indicated that the storage tank had been removed and should be deleted from the New Mexico Petroleum Storage Tank Program's regulated storage tanks list for the Facility. Based on the provided comment information, the Permittee recommended AOC CC* be placed on Facility Permit Table 3 with a Corrective Action Complete without Controls status.			
AOC EE*-POL Storage Tank No. 444	4	The Permittee provided a synopsis of available RFA information and institutional knowledge regarding AOC EE*. The Permittee attached specification detail diagram	43	Permittee comment information did not provide adequate supporting evidence for a status determination. Pertinent tank removal documentation records, evidence of associated confirmation sampling, and sample analysis results have not been provided. The absence of this information has resulted in	No

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		information for removal of the storage tank in support of comment information. AOC EE*, POL Storage Tank No. 444 was identified as a 1,000-gallon diesel fuel storage tank of unknown construction. The storage tank was reportedly located in the maintenance shop area near Building 444 and removed in 1988. Storage tank removal reportedly coincided with expansion of Building 444. Storage tank removal specification information indicated that the tank was a 9 by 18-foot steel UST utilized for the storage of No. 1 and No. 2 Fuel Oil. The Permittee indicated that no additional Air Force or NMED records information was available for the tank. Based on the provided comment and information, the Permittee recommended AOC EE* be placed on Facility Permit Table 3.		a data gap requiring further investigation. AOC EE* will remain on Facility Permit Table 1 pending investigation at the storage tank location or additional conclusive information.	
AOC FF*-POL Storage Tank No. 728	4	The Permittee provided a synopsis of available RFA information and attached supporting documents Table 3-7 Cannon AFB Tank Status (Table 3-7) and a Real Property Accountable Record for Building 728. A link to available NMED PSTB online storage tank database information was also included with comment information.	44	Permittee comment information did not provide adequate evidence to support a status determination. Pertinent tank removal documentation records, evidence of associated confirmation sampling, and sample analysis results were not provided for the UST. The absence of this information has resulted in a data gap requiring further investigation or additional conclusive information. Additional information is also required for the AST identified at Building 728 that	No

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		AOC FF*, POL Storage Tank No. 728, was identified as a 1,000-gallon diesel fuel storage tank of unknown construction. The storage tank was reportedly removed in September 1994. Additional Table 3-7 information indicated that an "Investigation required/Awaiting approval of closure plan" status for AOC FF*. Provided Facility Real Property Accountable Record information indicated that the storage tank was logged as removed on September 26, 1996. The record information noted the tank condition as "usable". The record also indicated that an additional 1,000-gallon aboveground storage tank was installed at Building 728 to replace the removed UST. Available NMED Petroleum Storage Tank Bureau (PSTB) database information indicated that one UST associated with Building 728 was documented as "removed". No record of the additional aboveground storage tank (AST) was noted in the NMED PSTB database information. Based on the provided comment information, the Permittee recommended AOC FF* be placed on Facility Permit Table 3.		replaced the UST. Pending further information or investigation, AOC FF* will be listed on Permit Table 2.	

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AOC GG*-POL Storage Tank No. 1400	4	Permittee comment information indicated that AOC GG*, POL Storage Tank No. 1400, was abandoned in place in 1994. The UST was previously utilized as a diesel fuel storage tank for the CAFB Hospital Building emergency generator. The Permittee indicated that the UST was slated for removal from the ground in 2018. AOC GG* has also been designated as site ST-C504 and TU504 in recently submitted RCRA Facility Investigation (RFI) reporting for the site by the Permittee. Due to ongoing investigation, the Permittee recommended AOC GG* be placed on Facility Permit Table 2 with a Corrective Action Complete with Controls status and be identified as TU504.	45	AOC GG* is a 24,000-gallon UST. A release of diesel fuel has been documented at AOC GG*. Investigation of the release has identified contamination exceeding NMED Soil Screening Levels (SSLs) for Polycyclic Aromatic Hydrocarbons and Diesel Range Organics from 5 feet below ground surface (bgs) to a depth of at least 190 feet bgs. However, based on ongoing investigation, and in conformance with prior Facility Permit record and reporting documentation, AOC GG* will be moved from Draft Facility Permit Table 1 and be retained on Permit Table 2 pending further investigation. The unit will continue to be listed as AOC GG*, POL Storage Tank No. 1400 (Former Hospital Emergency Generator UST) on the Facility Permit and must be referenced as such in any additional report document submittals.	Yes
Table 1: AOC Comments Document, AOC HH*-POL Storage Tank No. 2110	4	The Permittee provided a synopsis of available RFA information, Table 3-7 document information, and a Real Property Accountable Record for Building 2110. A link to available NMED PSTB online storage tank database information was also included with comment. AOC-HH*, POL Storage Tank No. 2110, was identified as a 550-gallon UST utilized for the storage of diesel fuel. The storage tank was reportedly	46	Permittee comment information did not provide adequate evidence to support a status determination. Pertinent records documenting storage tank removal, associated confirmation sampling, and sample analysis result information has not been provided. The absence of this information has resulted in a data gap requiring further investigation. Additionally, the September 1992 document titled *Cannon Air Force Base New Mexico Storage Tank Management Plan* retained in NMED's Facility record identified two 550-gallon underground storage tanks at Building 2110. One storage tank was utilized for the storage of diesel fuel and was listed as in-service (assumed to be AOC HH*). An additional storage tank utilized for the storage of Mogas (gasoline) was also on record for Building	No

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		located in the maintenance shop area near Building 2110. RFA information indicated no history of release. The provided record information indicated a storage tank removal date of November 8, 1994. The Real Property Accountable Record for Building 2110 indicated that the storage tank was logged as removed on September 26, 1996. The tank condition information was noted as "usable". Based on the provided comment information, the Permittee recommended AOC HH* be placed on Facility Permit Table 3.		2110. The Mogas tank was listed as not in service. Additional information is required to resolve the identified records information discrepancy and provide adequate documentation of storage tank removal at Building 2110. AOC HH* will remain on Permit Table 1 pending further conclusive information and/or investigation.	
AOC II*-POL Storage Tank No. 2160	4	The Permittee provided a synopsis of available RFA information, Appendix F Inventory information, and a Real Property Accountable Record for Building 2160. AOC-II*, POL Storage Tank No. 2160, was identified as a 550-gallon AST utilized for the storage of diesel fuel. The AST was located at a maintenance shop area (Building 2160) on the eastern portion of the Facility. Permittee provided information indicated that Building 2160 was demolished in 1984 and the storage tank likely removed during demolition. The Permittee also indicated that, due to the above ground nature of the storage tank, any releases	47	Although the AST appears to have been removed during demolition of Building 2160, adequate supporting information to corroborate the comment information was not provided. Additionally, the RFA information appears to have been gathered after the demolition of Building 2160. Therefore, any information regarding the location, final condition, and any evidence of releases cannot be reconciled with the provided information. Additional information is required to resolve the identified records data gap and provide adequate documentation of storage tank removal at Building 2160. AOC II* will remain on Facility Permit Table 1 pending further information and/or investigation.	No

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		would likely have not gone unnoticed. The Permittee concluded it was unlikely any contamination existed at the site due to the aboveground nature of AOC II*. Based on the provided comment information, the Permittee recommended AOC II* be placed on Facility Permit Table 3.			
AOC JJ-POL Storage Tank No. 2276	4	The Permittee provided a synopsis of available RFA information, a CAFB to NMED letter of correspondence dated February 16, 1993 and referenced as Underground Storage Tank (UST) Removal Project at Cannon Air Force Base and Attachment 1, List of former UST Sites (1993 UST Correspondence Letter), and various analytical results for confirmation sampling conducted during storage tank removal at Buildings 2276, 2270, 327, and 2280. AOC-JJ, POL Storage Tank No. 2160, was identified as a 550-gallon UST utilized for the storage of diesel fuel. Permittee records information indicated that the tank was removed in December 1992. At the time of removal, the storage tank was unregistered. The confirmation sample analysis results indicated that two samples were collected during storage tank removal activities. The confirmation samples were analyzed for Total Recoverable Petroleum	48	Permittee provided storage tank removal confirmation sample analysis result information indicated COC concentrations were below applicable NMED SSLs for the analysis performed. Based on the provided confirmation sample analysis information, AOC JJ does not pose a threat to human health or the environment and qualifies for corrective action complete without controls status. AOC JJ, POL Storage Tank No. 2276 will be transferred to Facility Permit Table 3.	Yes

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		Hydrocarbons (TRPHC), tert-butyl methyl ether (MTBE), benzene, toluene, ethylbenzene, and m, p, o-xylene (BTEX). Confirmation sample analysis for the two collected samples indicated that concentrations of TRPHC, BTEX, and MTBE were below applicable NMED SSLs. Based on the comment and supporting information, the Permittee recommended that AOC JJ be placed on Facility Permit Table 3. However, NMED has noted that sample analysis result information appeared to be hand written in the soil sample data analysis report columns for the chemical of concern (COC) results and sample precision result information provided by Trace Analysis laboratory. NMED has assumed that the provided information was transcribed to account for poor document print quality and is acceptable to NMED.			
AOC KK-POL Storage Tank No. 2280	4	The Permittee provided a synopsis of available RFA information and attached the supporting documents Memo on the Generator UST at Facility 2280 (Facility 2280 UST Memo), a 1993 UST Correspondence Letter, and various confirmation sampling analytical results collected during storage tank removal at Buildings 2276, 2270, 327, and 2280.	49	Permittee-provided storage tank removal confirmation sample analysis results indicated that COC concentrations were below applicable NMED SSLs for the analyses performed. Based on the provided confirmation sample analysis information, AOC KK does not pose a threat to human health or the environment and qualifies for corrective action complete without controls status. AOC KK, POL Storage Tank No. 2280 will be transferred to Facility Permit Table 3.	Yes

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		AOC-KK, POL Storage Tank No. 2280 was identified as a 1,000-gallon diesel fuel storage tank. The storage tank was reported as located in the Combat Aircraft Parking Area. Permittee provided information documented in the RFA indicated no history of release. The Facility 2280 UST Memo and the 1993 UST Correspondence Letter indicated that the storage tank was located on the eastside of the main runway, on the eastside of the access road. Records of excavation for the storage tank pit contained only evidence of remnant tank piping and metal tank hold downs. No record of actual storage tank removal was available. Confirmation sample result information collected during tank pit investigation activities dated November 17, 1992 indicated that concentrations of TRPHC, MTBE, and BTEX were below applicable NMED SSLs. However, NMED has noted that sample analysis result information appeared to be hand written in the soil sample data analysis report columns for COC results and sample precision result information provided by Trace Analysis. NMED has assumed that the provided information was transcribed to account for poor document print quality and is acceptable as submitted.			

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AOC LL-POL Storage Tank No. 2285	4	The Permittee provided a synopsis of available RFA information and attached the supporting documents Notification for Underground Storage Tanks, Cannon AFB Tank Closure Worksheet, NMED Underground Storage Tank Bureau/Prevention Inspection Section Inspection Report, confirmation sample analysis results, a general site location map, Sheet1 a sample field analysis result data table, and associated Facility 2285 investigation field note information. AOC-LL, POL Storage Tank No. 2285 was identified as a 1,000-gallon UST utilized for the storage of diesel fuel. The UST was located in the Combat Aircraft Parking Area at Building 2285. The provided RFA information did not indicate a history of releases for the storage tank. Records information also indicated that the storage tank was removed on January 19, 1995. The provided NMED PSTB tank removal inspection records and accompanying analytical report information indicated that four confirmation samples were collected two feet below the bottom of the storage tank. Tank inspection records indicated that the UST and piping were intact. However, initial	50	Evidence of a release at AOC LL is apparent based on initial confirmation sampling information collected during tank removal activities. Although a subsurface investigation was conducted following UST removal activities, the collected soil samples appear to have only been subjected to field testing. Laboratory analysis of soil samples was not conducted to confirm the results of the field testing. Field testing result data must always be corroborated by laboratory analysis. AOC LL, POL Storage Tank No. 2285 will remain on Facility Permit Table 1 pending additional information or completion of additional investigation.	No

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		confirmation soil sample analysis results indicated that concentrations of TRPHC were detected above NMED SSLs. In response to the results of initial confirmation sampling, an additional subsurface investigation was conducted in April 1995. Five soil borings were advanced to sixteen feet below ground surface (bgs) within the former tank pit area. Samples were collected at nine and fourteen feet bgs below the base of the storage tank excavation. Subsurface investigation and field note information indicates that the collected soil samples were only field tested fordiesel fuel and BTEX. Based on information provided, the Permittee recommended AOC LL be placed on Facility Permit Table 3.			
AOC MM-POL Storage Tank No. 2300	4	The Permittee provided a synopsis of available RFA information and attached the supporting documents CAFB Memo on the UST at Facility 2300, Tank Closure Worksheet for a 550-gallon UST, soil sample analysis results report information, photographic documentation of storage tank removal, a Tank Closure Worksheet for an additional 275-gallon UST, October 1994 soil sample analysis result report, 1993 UST Correspondence Letter, and a Real	51	Permittee provided storage tank removal confirmation sample analysis results information indicated that COC concentrations were below applicable NMED SSLs for the analysis performed for the identified 550-gallon and 275-gallon storage tanks. Based on the confirmation sample analysis information, the storage tanks do not pose a threat to human health or the environment and qualify for corrective action complete without controls status. AOC MM, POL Storage Tank No. 2300 will be transferred to Facility Permit Table 3.	Yes

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		Property Accountable Record for Building 2300. AOC-MM, POL Storage Tank No. 2300, was identified as a 550-gallon UST utilized for the storage of diesel fuel for the Building 2300 furnace. A second 275-gallon UST was also identified on the southside of the building during prior investigation. The 275-gallon UST was reportedly utilized for the storage of diesel fuel for an emergency generator. The 550-gallon UST (AOC MM) was reportedly removed on November 8, 1991. However, due to improper sampling during initial UST removal activities, the tank pit was re-excavated in November 1992. One confirmation soil sample was collected from the tank pit during re-excavation activities. Soil sample analysis results indicated concentrations of total petroleum hydrocarbons (TPH) and BTEX were below applicable soil screening levels. The 275-gallon emergency generator UST was reportedly removed and sampled on October 28, 1994. Confirmation sample analysis results collected during storage tank removal were below laboratory detection limits; therefore, they did not exceed applicable NMED SSLs. Based on the			

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		provide information, the Permittee recommended AOC MM be placed on Facility Permit Table 3.			
AOC NN-POL Storage Tank No. 2302	4	The Permittee provided a synopsis of available RFA information and attached the supporting confirmation soil sample laboratory analysis result information collected during UST removal, tank removal photographic documentation, an Excavation Site Worksheet, Tank Closure Worksheet, Certificate of Tank Destruction, and Certificate of Vapor Testing. AOC-NN, POL Storage Tank No. 2302, was identified as a 550-gallon UST utilized for the storage of diesel fuel. Permittee-provided RFA information indicated that the UST had no history of releases. The records indicate that the UST was removed on October 12, 1994. Four confirmation soil samples were subsequently collected. Results of confirmation sample analysis indicated that concentrations of TPH and BTEX were below laboratory detection limits. Photographic evidence of tank removal activities indicate that the UST was removed from the ground and properly disposed (cut-up with off-site disposal). Based on the provide information, the Permittee	52	Permittee-provided storage tank removal documentation and confirmation soil sample analysis result information indicated that COC concentrations were below applicable NMED SSLs for the analyses performed. Based on the provided confirmation sample analysis information, the storage tank does not pose a threat to human health or the environment and qualifies for corrective action complete without controls status. AOC NN, POL Storage Tank No. 2302 will be transferred to Facility Permit Table 3.	Yes

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		recommended AOC NN be placed on Facility Permit Table 3.			
AOC OO-POL Storage Tank No. 2307	4	The Permittee provided a synopsis of RFA information and additional Permittee records information in the provided comment. AOC-OO, POL Storage Tank No. 2307, was identified as a 550-gallon diesel fuel UST of unknown construction located in the Combat Aircraft Parking Area. Permittee-provided RFA information indicated no history of release. Cited Permittee records information indicated that the UST had been removed in September 1996. The Permittee recommended AOC OO be placed on Table 2.	53	Permittee comment information did not provide adequate evidence to support a status determination. Pertinent tank removal documentation records and evidence of associated confirmation sampling and analysis were not provided. The absence of this information has resulted in a data gap requiring further investigation. AOC OO will remain on Facility Permit Table 1 pending additional conclusive information and/or subsurface investigation.	No
AOC PP-POL Storage Tank No. 2309	4	The Permittee provided a synopsis of available RFA information and attached the supporting documents Air Force Memo on the Jet Fuel Tank at Facility 2309 (Jet Fuel Tank Memo), a Real Property Accountable Record for Building 2309, CAFB to NMED correspondence referenced as "Registration of UST for 1989" (1989 UST Registration Memo), and a schematic drawing of the storage tank, associated test stand, and housing.	54	Permittee comment information did not provide adequate evidence to support a status determination. Based on the nature of the AST and associated jet engine test cell operations and the reported potential for release (spillage during tank refilling operations), additional investigation is warranted. Furthermore, any release of hazardous waste or hazardous constituents to the environment at a RCRA permitted facility is subject to the corrective action investigation and reporting requirements stipulated in the Facility Permit (Part 3: Corrective Action for Solid Waste Management Units and Areas of Concern). The Permittee must provide conclusive evidence that a release has not occurred in association with the storage tank at each test cell. Additionally, readily available NMED PSTB Storage tank	No

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		AOC PP POL, Storage Tank No. 2309, was originally identified as a 2,500-gallon UST utilized for the storage of JP-4 fuel. Permittee records indicated that the storage tank was actually an aboveground storage tank. The Permittee indicated that the storage tank was exempt from RCRA regulation because it was utilized for the storage of jet fuel and should be removed from the facility Permit. The provided Jet Fuel Tank Memo indicated the original 2309 facility was a jet engine test cell off the "22 end" of the Facility runway. The AST was moved when the test cell facility was demolished. AOC PP was then reportedly relocated to new test cell 5113. However, the 2309 storage tank designation was maintained after relocation. Permittee records indicated that the storage tank may have been moved a third time to an open storage area. The information provided appears to indicate that POL Storage Tank No. 2309 was removed from the Facility record sometime between November 1988 and March 1989. The provided memo indicated that no release had occurred due to storage tank repurposing, and the only contamination that would have occurred in association with the storage tank would have occurred		database information indicates that a UST was registered and logged as "removed" for the Facility 2309 listing and has been identified as a discrepancy in the provided comment and records information. AOC PP will remain on Facility Permit Table 1 pending further information, resolution of the discrepancy regarding the reported AST and UST identified for Facility 2309, and/or investigation.	

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		during filling operations as spillage. The 1989 UST Registration Memo concurs with a March 1989 tank decommissioning date. Based on the provided information, the Permittee recommended AOC PP be placed on Permit Table 3.			
AOC QQ-POL Storage Tank No. 2313	4	The Permittee provided a synopsis of available RFA information and attached the supporting document Air Force Memo on UST 2313 (UST 2313 Memo). AOC QQ, POL Storage Tank No. 2313, was identified as a 550-gallon UST utilized for the storage of diesel fuel. The storage tank was located at the Facility Small Arms Range. Permittee-provided RFA information indicated no history of release. Provided records information indicated that the tank was removed sometime between 1988 and 1989 following demolition of Building 2313. A September 1991 metal detector investigation documented in the UST 2313 Memo did not provide conclusive evidence regarding the location of the storage tank. The conclusions of the memo recommended a more thorough investigation to confirm the removal of the UST. The Permittee	55	Permittee comment information did not provide adequate evidence to support a status determination. Information from the September 1992 *Cannon Air Force Base New Mexico Storage Tank Management Plan* retained in NMED's Facility record documented a 626-gallon diesel fuel UST at Building 2313. The storage tank was listed as removed under Permittee Project Number 90-9010. However, no supporting tank removal documentation or confirmation sampling information was available for the record listing. AOC QQ will remain on Facility Permit Table 1 pending further information and/or investigation.	No

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		recommended AOC QQ be placed on Permit Table 3.			
AOC RR-POL Storage Tank No. 2321	4	The Permittee provided a synopsis of available RFA information and provided an account of the demolition of Building 2321. AOC RR, POL Storage Tank No. 2321, was identified as a 550-gallon underground diesel fuel storage tank. Permittee-provided RFA information indicated that the storage tank had no history of release. The Permittee also indicated Building 2321 was demolished in 2010. The Permittee indicated that the storage tank was likely removed during building demolition activities. However, no supporting records information was available to substantiate storage tank removal. Based on the available information, the Permittee recommended AOC RR be placed on Permit Table 2.	56	AOC RR, POL Storage Tank No. 2321 will remain on Facility Permit Table 1 pending submittal of conclusive storage tank removal documentation, which must include confirmation soil sample analysis results, or the completion of investigation at the site.	No
AOC SS-POL Storage Tank No. 2327	4	The Permittee provided a synopsis of available RFA information and attached the supporting documents "Memo on the UST at Facility 2327", and two separate documents titled "Memo on the Heating Oil UST Facility 2327" dated March 11, 1992 and December 17, 1992, a Building	57	Permittee-provided storage tank removal confirmation sample analysis result information indicated that COC concentrations were below applicable NMED SSLs for the analysis performed. Based on the provided confirmation sample analysis information, AOC SS does not pose a threat to human health or the environment and qualifies for corrective action complete without controls status. AOC SS, POL	Yes

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		2327 Tank Closure Work Sheet, an NMED Underground Storage Tank Bureau Inspection Report, photographic evidence of storage tank removal, a contractor storage tank removal documentation report, sample analysis report information, a UST Removal Project memo, and a Real Property Accountable Record for Building 2327. AOC SS, POL Storage Tank No. 2327, was identified as a 650-gallon UST utilized for the storage of diesel fuel. Permittee-provided RFA information indicated that the storage tank was "active" and had no history of release. The UST was reportedly installed in 1974. The tank was reportedly out of service for a period of three to four years prior to removal due to the conversion of the Building 2327 heating system to butane fuel. Permittee records indicated that the UST was removed on November 8, 1991. No storage tank integrity issues were reported during tank removal activities; however, residual fuel spillage was noted. The storage tank pit was reportedly backfilled with a mixture of soil, rock, and asphalt chunks. The account of backfill material was confirmed in the provided NMED UST Inspection		Storage Tank No. 2327 will be transferred to Facility Permit Table 3.	

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		Report. A documented March 1992 reevaluation of UST removal activities identified issues with the collected confirmation samples. As a result, additional excavation at the tank pit and the collection of additional confirmation samples was completed in November 1992. Confirmation sample analysis results indicated that TRPH and BTEX were not detected. Removal of the UST was logged on a Building 2327 Real Property Accountable Record log on January 25, 1993. Based on information provided, the Permittee recommended AOC SS be placed on Permit Table 3.			
AOC TT-POL Storage Tank No. 2328	4	The Permittee provided a synopsis of available RFA information and attached the supporting documents General Notes and Memo on the UST at Facility 2328. AOC TT, POL Storage Tank No. 2328, was identified as a 3,000-gallon UST utilized for the storage of diesel fuel. The storage tank was reportedly located on the eastside of the Facility VET Clinic. Permittee provided RFA information indicated that the UST had no history of release. Records indicated that the storage tank was removed in March 1989 after conversion of various CAFB facilities	58	Permittee comment information did not provide adequate evidence to support a status determination. The provided information indicated inadequate documentation of storage tank removal activities and a lack of confirmation sampling information. AOC TT will remain on Facility Permit Table 1 pending additional information or further investigation.	No

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		to propane heating. Removal of the UST was conducted by CAFB staff personnel only. No confirmation soil samples or photographic evidence of tank removal were collected during storage tank removal activities. The Permittee recommended AOC TT be placed on Permit Table 3.			
AOC UU-POL Storage Tank No. 2330	4	The Permittee provided a synopsis of available RFA information and attached the supporting documents "General Notes" and "Memo on the UST facility 2328", which contained information pertaining to storage tank 2330. AOC UU, POL Storage Tank No. 2330, was identified as a 550-gallon UST utilized for the storage of diesel fuel. The storage tank was reportedly located in the Combat Aircraft Parking Area. Permittee-provided RFA information indicated that the storage tank had no history of release. However, Permittee records indicated that the storage tank was removed in March 1989. Information provided in the General Memo document indicated that the storage tank had a 700-gallon capacity. Removal of the UST was conducted by CAFB staff personnel only. No visible signs of leakage were noted during the removal; however, no	59	Permittee comment information did not provide adequate evidence to support a status determination. The provided information indicated inadequate documentation of storage tank removal activities and a lack of confirmation sampling information. AOC UU will remain on Facility Permit Table 1 pending investigation.	No

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		confirmation soil samples were collected. The Permittee recommended AOC UU be placed on Permit Table 3.			
SWMU 3, OWS No. 108	5	Permittee comment information indicated that a Hazardous and Solid Waste Amendments/Corrective Action-Related Modification Request: No Further Action Proposal submitted in October 2004 (2004 Corrective Action Complete Proposal) documented the information utilized in the 2006 status determination for SWMU 3, OWS No. 108. A human health risk screen evaluation conducted for SWMU 3 resulted in an excess carcinogenic risk factor of 4.0 $x10^{-5}$ for human health, which exceeded the carcinogenic target risk 1.0 $x10^{-5}$ as established in NMED's Risk Assessment Guidance for Site Investigations and Remediation (NMED Risk Assessment Guidance). The Permittee attributed the risk exceedance to concentrations of arsenic detected in collected soil samples for the site. Total recoverable petroleum hydrocarbons (TRPH) were also detected above NMED residential SSLs. The Permittee attributed the exceedance to collection of a single soil sample below the asphalt covering. Based on the provided comment information, the Permittee	60	Results of the risk assessment presented in CAFB's submitted 2004 Corrective Action Complete Proposal indicated that the human health risk exceeded NMED's carcinogenic target risk for the residential exposure scenario. Additionally, NMED's site status determination documented in the December 28, 2005*Fact Sheet/ Statement of Basis, Cannon Air Force Base Request for Thirty-Two Solid Waste Management Units and Areas of Concern*(2005 NMED Statement of Basis), was based on the current and anticipated future industrial land use scenario for SWMU 3 at the time of evaluation. Furthermore, the 2005 NMED Statement of Basis stipulated that any SWMU or AOC with one or more constituents detected in soil above NMED's residential SSLs would be retained in the Facility Permit with a Corrective Action Complete with Controls status (Table 2). Based on NMED's prior site status determination and the requirements of NMED's Risk Assessment Guidance, additional risk screen evaluation and/or investigation is warranted. SWMU 3, Oil Water Separator No. 108, will be retained on Permit Table 2.	No

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		recommended SWMU 3 be moved to Facility Permit Table 3.			
SWMU 12-Jet Engine Shop Dip Tank	5	Permittee comment information indicated that SWMU 12, Jet Engine Shop Dip Tank activities were conducted completely inside Building 680 a Jet Propulsion Shop. The Permittee indicated that the unit was an indoor self-contained tank, therefore no adverse impact to the environment was suspected. Furthermore, no releases were identified from the unit at the time of the 1987 RFA. Based on the provided comment information, the Permittee recommended SWMU 12 be moved to Permit Table 3.	61	The comment information did not provide sufficient evidence to support a status determination. Historical information indicates that jet engine mechanical part solvent-based degreasing operations were conducted at SWMU 12. SWMU 12 will be retained on Facility Permit Table 2 pending the submittal of additional comprehensive unit and jet engine shop operations process and use history information; all information pertaining to unit dimensions, capacity, and structural description; specifications of all hazardous waste, hazardous constituents, other waste, or other substances managed at the unit and all available information pertaining to releases during the operational history of the unit; and/or investigation at Building 680.	No
SWMU 13-Jet Engine Shop Indoor Wash Rack	5	Permittee comment information indicated that SWMU 13, Jet Engine Shop Indoor Wash Rack was utilized during jet engine cleaning operations. The Permittee indicated that any contaminants associated with jet engine cleaning operations would have drained to an OWS located inside the Building 680 Jet Propulsion Shop (SWMU 16, OWS No. 680). Permittee-provided information from the completed RFA indicated no documented releases from the unit. Based on the provided comment information, the Permittee	62	The comment information did not provide sufficient evidence to support a status determination. Historical information indicates that although the wash rack was situated within Building 680, the unit was not equipped with containment curbing. The lack of containment curbing may have allowed waste wash water containing hazardous constituents to migrate beyond the wash rack area potentially resulting in the release of contaminants to the environment. SWMU 13 will be retained on Permit Table 2 pending the submittal of additional comprehensive unit and jet engine shop operations process and history information; all information pertaining to unit dimensions, capacity, and structural description; specifications of all hazardous waste, hazardous constituents, other waste, or substances managed at	No

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		recommended SWMU 13 be moved to Permit Table 3.		the unit; all available information pertaining to releases during the operational history of the unit; and/or investigation at Building 680.	
SWMU 14-Pneudralics Shop Dip Tank	5	Permittee comment information indicated SWMU 14, Pneudralics Shop Dip Tank, was located inside the Building 680 Jet Propulsion Shop. The Permittee indicated the unit was self-contained; therefore, no adverse impact to the environment was suspected from the tank. No releases were identified from the unit in the RFA.	63	The comment information did not provide sufficient evidence to support a status determination. Historical information indicates that SWMU 14 was utilized during maintenance and repair of aircraft pneumatic and hydraulic systems. Solvent cleaning agents were reportedly utilized during maintenance operations. SWMU 14 will be retained on Permit Table 2 pending the submittal of additional comprehensive unit and pneudralics shop operations process and history information; all information pertaining to unit dimensions, capacity, and structural description; specifications of all hazardous waste, hazardous constituents, other waste, or other substances managed at the unit; all available information pertaining to releases during the operational history of the unit; and/or investigation at Building 680.	No
SWMU 15-Pneudralics Shop Former Drum Storage	5	Permittee comment information indicated the SWMU 15, Pneudralics Drum Storage, area was located inside the Building 680 Jet Propulsion Shop. At the time of the RFA, drum storage had ceased at the SWMU location and had transitioned to SWMU 19 (Container Accumulation Area No. 681). Permittee provided RFA information indicated no history of release from SWMU 15. The Permittee also claimed historical Table 2 notes indicated that the site did not require investigation by the EPA.	64	The comment information did not provide sufficient evidence to support a status determination. Historical information indicates that the unit was utilized for the management of waste hydraulic fluid, which was transferred to 55-gallon drums located at the storage area. Available historic information indicates that waste storage at SWMU 15 dates to at least 1965. RFA information regarding conditions of the drum storage area during its utilization as a waste accumulation area was not available. NMED has identified this as a data gap, which must be resolved. Additionally, the lack of regulations for the generation and storage of hazardous waste during a significant portion of the storage area history presents the potential for waste storage management practices, which may have resulted in releases to the environment.	No

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				Review of the Permit Table 2 footnote indicates that the status determination was based solely on information provided in the RFA. NMED considers the information provided in the RFA to be outdated and insufficient for status determinations. SWMU 15 will be retained on Permit Table 2 pending the submittal of additional comprehensive unit and pneudralics shop operations process and history information; all information pertaining to unit dimensions, capacity, and structural description; specifications of all hazardous waste, hazardous constituents, other waste, or other substances managed at the unit; all available information pertaining to releases during the operational history of the unit; and/or investigation at Building 680.	
SWMU 17-Bearing Cleaner Tank	5	Permittee comment information indicated that SWMU 17, Bearing Cleaner Tank, activities were conducted completely inside the Building 680 Jet Propulsion Shop. The Permittee concluded that the unit was self-contained and used inside the building; therefore, no adverse impact to the environment was suspected. The Permittee indicated that no releases from the unit were identified at the time of the RFA.	65	The comment information did not provide sufficient evidence to support a status determination. Historical information indicates the unit was an elevated metal tank used for cleaning of bearings, which employed the use of solvents. Staining on the outside of the tank and on the floor were noted in the RFA information. SWMU 17 will be retained on Permit Table 2 pending the submittal of additional comprehensive unit and jet propulsion shop operations process and history information; all information pertaining to unit dimensions, capacity, and structural description; specifications of all hazardous waste, hazardous constituents, other waste, or other substances managed at the unit; all available information pertaining to releases during the operational history of the unit; and/or investigation at Building 680.	No

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SWMU 18-Bearing Cleaner and Carbon Remover	5	Permittee comment information indicated that SWMU 18, Bearing Cleaner and Carbon Remover, activities were conducted completely inside the Building 680 Jet Propulsion Shop. The Permittee concluded that the unit was self-contained and used inside the building; therefore, no adverse impact to the environment was suspected. Furthermore, no releases were identified from the unit at the time of the RFA.	66	The comment information did not provide sufficient evidence to support a status determination. Historical information indicates that SWMU 18 is comprised of various 1-gallon containers which contained bearing cleaner and carbon remover compound. The SWMU 18 containers were reported as self-contained inside Building 680 on a table. No secondary containment was noted. SWMU 18 will be retained on Facility Permit Table 2 pending the submittal of additional comprehensive unit and jet propulsion shop operations process and history information; all information pertaining to unit dimensions, capacity, and structural descriptions; specifications of all hazardous waste, hazardous constituents or other waste managed at the unit; all available information pertaining to releases during the operational history of the unit; and/or subsurface investigation at Building 680.	No
SWMU 20-Armament Recording Lab Floor Drains	5	Permittee comment information indicated that SWMU 20, Armament Recording Lab Floor Drains, would have captured any developing solution spilled from photo developing activities and would have discharged the waste to SWMU 98. The Permittee concluded that any contamination released to the environment would have been released in association with the sanitary sewer, which was previously granted Corrective Action Complete without Controls status. Therefore, SWMU 20 should also be granted the same status.	67	The comment information did not provide sufficient evidence to support a status determination. Historical information indicates that floor drains are located in the Armament Recording Lab at Building 600. Film processing waste potentially released to the drains may have included developer, stop bath, fixer and other solutions containing silver (EPA hazardous waste code: D011), and photo flo solution. Approximately twenty gallons of spent fixer were reportedly discharged to the sanitary sewer every six weeks. No waste characterization information was provided with Permittee comment. SWMU 20 will be retained on Permit Table 2 pending the submittal of additional comprehensive unit and armament recording lab operations process and history information; all information pertaining to unit dimensions, capacity, and structural description; specifications of all hazardous waste,	No

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				hazardous constituents, other waste, or substances managed at the unit; all available information pertaining to releases during the operational history of the unit; and/or subsurface investigation at Building 600.	
SWMU 32A-OWS No. 186 (No. 1-East)	5	Permittee comment information indicated that a 2004 NFA (No Further Action) determination described the conditions that moved SWMU 32A, OWS No. 186, from Facility Permit Table 1 to Table 2. Based on screening levels at the time, the excess carcinogenic risk was calculated at 4.0 $x10^{-5}$for the residential exposure scenario. The Permittee indicated that updated 2017 NMED SSLs would result in an exposure risk below the established target risk level of 1.0 x 10^{-5}.	68	NMED's review of Corrective Measures Completion information included in the 2004 Corrective Action Complete Proposal, which documented the 1999 removal of SWMU 32A Oil Water Separator No. 186 (No. 1-East), indicated that concentrations of COCs were found to be either below laboratory detection limits or below applicable NMED residential SSLs. SWMU 32A was initially moved from Permit Table 2 to draft Permit Table 3. Based on the results of the corrective measure completed at the site, which included sampling of subsurface soils below the unit and removal of the OWS, SWMU 32A will be retained on Permit Table 3.	No
SWMU 33B-Oil/Water Separator No. 186 (No. 2-West)	5	Permittee comment information indicated that a 2004 NFA determination described the conditions that moved SWMU 33B, OWS No. 186, from Permit Table 1 to Table 2. Based on screening levels at the time, the excess carcinogenic risk was calculated at 4.0 $x10^{-5}$for the residential exposure scenario. The Permittee indicated that updated 2017 NMED SSLs would result in a risk below the established target risk level of 1.0 x 10^{-5}.	69	NMED's review of Corrective Measures Completion information included in the 2004 Corrective Action Complete Proposal, which documented the 1999 removal of SWMU 33B Oil Water Separator No. 186 (No. 2-West), indicated that concentrations of COCs were found to be either below laboratory detection limits or below applicable NMED residential SSLs. SWMU 33B was initially moved from Permit Table 2 to draft Permit Table 3 based on the results of the corrective measure completed at the site, which included sampling of subsurface soils below the unit and removal of the OWS. SWMU 33B will be retained on Permit Table 3.	No

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SWMU 35-Aircraft Drip Pans	5	Permittee comment information indicated that the SWMU 35, Air Craft Drip Pans were placed beneath aircraft in Aircraft Maintenance Building 149. The pans were an environmental control utilized to prevent accidental spills from aircraft fluids. All spills to pans would have been cleaned up per protocol so that the pan could be re-used in the future. The Permittee recommended SWMU 35 be moved to Facility Permit Table 3.	70	Due to the transitory nature of the location of drip pans utilized during maintenance activities at Aircraft Maintenance Building 149, it is not believed that actual locations for the unit(s) can be reconciled. SWMU 35 was initially moved from Permit Table 2 to draft Permit Table 3. SWMU 35 will be retained on Permit Table 3.	No
SWMU 37-Wheel and Tire Shop Cold Stripper Dip Tank	5	Permittee comment information indicated that the SWMU 37, Wheel and Tire Shop Dip Tank, was an 8 foot by 3-foot by 3-foot tank utilized to clean aircraft bearings. Waste from the tank was historically disposed at one of the landfills or fire training areas. Following this period, waste disposal generated from the dip tank was conducted by a contractor at an off-site facility. Based on the self-contained nature of the unit and the off-site disposal of the generated waste from the dip tank, there was no potential for release to the environment. The Permittee recommended SWMU 37 be moved to Permit Table 3.	71	The comment information did not provide sufficient evidence to support a status determination. Historical information indicates that the unit was an elevated metal tank used for cleaning bearings, which may have employed the use of solvents. Approximately 1,220 gallons of waste were reported generated yearly. SWMU 37 will be retained on Permit Table 2 pending the submittal of additional comprehensive unit and Wheel and Tire Shop operations process and history information; all information pertaining to specifications of all hazardous waste, hazardous constituents, other waste, or substances managed at the unit; all available information pertaining to releases during the operational history of the unit; and/or investigation at the Wheel and Tire Shop.	No
SWMU 41-Corrosion	5	Permittee comment information indicated that the spray booth paint filters were disposed of in the SWMU	72	The comment information did not provide sufficient evidence to support a status determination. The dumpster was reportedly located adjacent to the Building 196 Corrosion	No

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Control Shop Dumpster		41, Corrosion Control Shop Dumpster. Contents of the dumpster were properly disposed off-site by a contractor. The Permittee indicated that it was unlikely that any releases occurred from the paint filter disposal at the dumpster. No release was identified during the 1987 RFA. The Permittee recommended SWMU 41 be moved to Facility Permit Table 3.		Control Shop. Available historical information indicated that approximately thirty-one spray booth paint filters were disposed in the dumpster monthly. Waste paint residue had also been observed in the dumpster during completion of the RFA. SWMU 41 will be retained on Permit Table 2 pending the submittal of additional comprehensive unit and Corrosion Control Shop operations process and history information; all information pertaining to unit dimensions, capacity, and structural description; specifications of all hazardous waste, hazardous constituents, or other waste managed at the unit; all available information pertaining to releases during the operational history of the unit; and/or investigation at the Corrosion Control Shop and dumpster location.	
SWMU 42-Corrosion Control Shop Water Holding Tank	5	Permittee comment information indicated that water from the paint spray booth was collected at SWMU 42, Corrosion Control Shop Water Holding Tank. Paint was periodically skimmed from the surface of the water and disposed in the dumpster (SWMU 41). The Permittee indicated that water from the holding tank was flushed into SWMU 98. The unit was reportedly self-contained and indoors. Therefore, no adverse impact to the environment are suspected. The Permittee indicated that any release to the environment would have occurred once waste was disposed to the sanitary sewer. The Permittee recommended SWMU 42 be moved to Permit Table 3.	73	The comment information did not provide sufficient evidence to support a status determination. Historical information indicates that the unit was used to collect wastewater from the paint spray booth that may have contained hazardous constituents. SWMU 42 will be retained on Facility Permit Table 2 pending the submittal of additional comprehensive unit and Corrosion Control Shop operations process and history information; all information pertaining to unit dimensions, capacity, and structural description; specifications of all hazardous waste, hazardous constituents or other waste managed at the unit; all available information pertaining to releases during operational history of the unit; and/or investigation at the Corrosion Control Shop.	No

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SWMU 43-Fuel Systems Repair Shop Bowser	5	Permittee comment information indicated that SWMU 43, Fuel Systems Repair Shop Bowser, was a mobile tank used to hold JP-4 generated during aircraft servicing. Waste fuel stored in the tank was then utilized in fire training exercises or during burning of trash at various Facility landfills. The tank was reported as self-contained and utilized indoors. No adverse impact to the environment was suspected. The Permittee recommended SWMU 43 be moved to Permit Table 3.	74	The comment information did not provide sufficient evidence to support a status determination. Historical information indicates that SWMU 43 was utilized at the Building 196 Fuel System Repair Shop. Approximately 660-gallons of waste jet fuel were produced annually at the Fuel System Repair Shop. SWMU 43 will be retained on Permit Table 2 pending the submittal of additional comprehensive unit and Fuel System Repair Shop operations process and history information; all information pertaining to unit dimensions, capacities, and structural descriptions; specifications of all hazardous waste, hazardous constituents or other waste managed at the unit; all available information pertaining to releases during the operational history of the unit; and/or investigation at the Fuel System Repair Shop.	No
SWMU 44-Corrosion Control Shop Parts Stripper in Building 196		Permittee comment information indicated that SWMU 44, Corrosion Control Shop Parts Stripper, was a steel tank utilized during the stripping of oil and grease from aircraft parts. SWMU 44 was located at Building 196. Waste solvent generated during use of the tank was containerized in 55-gallon drums, which were then stored at the Corrosion Control Shop drum storage area (SWMU 40) prior to disposal. The Permittee recommended SWMU 44 be moved to Permit Table 3.	75	The comment information did not provide sufficient evidence to support a status determination. Historical information indicates that the unit was a steel tank used for degreasing aircraft parts, which employed the use of solvents. SWMU 44 will be retained on Permit Table 2 pending the submittal of additional comprehensive unit and Corrosion Control Shop operations process and history information; all information pertaining to unit dimensions, capacity, and structural description; specifications of all hazardous waste, hazardous constituents, other waste, or substances managed at the unit; all available information pertaining to releases during the operational history of the unit; and/or investigation at the Corrosion Control Shop.	No
SWMU 52-Waste Oil and	5	Permittee comment information indicated that SWMU 52, Waste Oil and Hydraulic Fluid Bowser, is	76	The comment information did not provide sufficient evidence to support a status determination. Historical information indicates that the unit was used to collect waste oil and	No

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Hydraulic Fluid Bowser		utilized during aircraft servicing operations. The unit is an indoor self-contained storage tank. The Permittee indicated that no release from the storage tank was reported in the RFA. The Permittee recommended SWMU 52 be moved to Permit Table 3.		hydraulic fluid generated at the Special Purpose Vehicle Maintenance Shop (Building 379). SWMU 52 will be retained on Permit Table 2 pending the submittal of additional comprehensive unit and Special Purpose Vehicle Maintenance Shop operations process and history information; all information pertaining to unit dimensions, capacity, and structural description; specifications of all hazardous waste, hazardous constituents, or other waste managed at the unit; all available information pertaining to releases during the operational history of the unit; and/or investigation at Building 379.	
SWMU 58-Special Purpose Vehicle Maintenance Shop PD-680 Dip Tank	5	Permittee comment information indicated that the SWMU 58, Special Purpose Vehicle Maintenance Shop PD-680 Dip Tank, was placed above a used solvent 55-gallon drum which collected waste generated during vehicle parts cleaning. The waste was historically sent to landfills or fire training areas for disposal and then was later disposed off-site by a contractor. The Permittee indicated that the unit was located indoors within the Special Purpose Vehicle Maintenance Shop and was unlikely to have impacted the environment. Historical waste disposal practice was reportedly conducted at landfill and fire training area SWMUs. The Permittee recommended SWMU 58 be moved to Permit Table 3.	77	The comment information did not provide sufficient evidence to support a status determination. Historical information indicates that solvent based parts washing operations were conducted at the unit. SWMU 58 will be retained on Permit Table 2 pending the submittal of additional comprehensive unit and Special Purpose Vehicle Maintenance Shop operations process and history information; all information pertaining to unit dimensions, capacity, and structural description; specifications of all hazardous waste, hazardous constituents, other waste, or other substances managed at the unit; all available information pertaining to releases during the operational history of the unit; and/or investigation at the Special Purpose Vehicle Maintenance Shop.	No

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SWMU 59-Civil Engineering Paint Shop	5	Permittee comment information indicated that SWMU 59, Civil Engineering Paint Shop, was a paint spray booth. The Permittee indicated that since the unit was indoors, it is unlikely that any environmental impact has occurred. Additionally, Building 357, where the spray booth was located, has been demolished and was replaced by the current Civil Engineering Complex, Buildings 355 and 356. The Permittee recommended SWMU 59 be moved to Permit Table 3.	78	The comment information did not provide sufficient evidence to support a status determination. Historical information indicates that the spray booth generated hazardous waste which included waste paint, lacquer thinner (toluene), and waste solvents. SWMU 59 will be retained on Permit Table 2 pending the submittal of additional comprehensive unit and Engineering Paint Shop operations process and history information; all information pertaining to unit dimensions, capacity, and structural description; specifications of all hazardous waste, hazardous constituents, other waste, or substances managed at the unit; all available information pertaining to releases during the operational history of the unit; and/or investigation at the former location of Building 357.	No
SWMU 69-New Entomology Mixing Room, Sink, and Floor Drains	5	Permittee comment information indicated that the SWMU 69, New Entomology Mixing Room, Sink and Floor Drains, were used to prepare herbicide solutions. The Permittee indicated that wastewater from SWMU 69 is discharged to a holding tank. All mixing operations were reportedly conducted indoors and were fully contained. The Permittee indicated that a release to the environment was unlikely. The Permittee recommended SWMU 69 be moved to Permit Table 3.	79	The comment information did not provide sufficient evidence to support a status determination. Historical information indicates that the Entomology Mixing Room is located at Building 212. Waste rinse water that contained waste pesticides and herbicides Pyrethrum, Dursban, and Malathion was generated and disposed at the site. Prior to holding tank storage, waste was discharged to the sanitary sewer. Furthermore, release controls were not noted during the completion of the RFA. SWMU 69 will be retained on Permit Table 2 pending the submittal of additional comprehensive unit and Entomology Mixing Room operations process and history information; all information pertaining to unit dimensions, capacities, and structural descriptions; specifications of all hazardous waste, hazardous constituents, other waste, or substances managed at the unit; all available information pertaining to releases during the operational history of the unit; and/or investigation of Building 212.	No

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SWMU 80-Drum Storage Area	5	Permittee comment information indicated that the SWMU 80, Drum Storage Area, could not be located and no information is available to substantiate the existence or location of the storage area. The Permittee recommended SWMU 80 be moved to Permit Table 3.	80	The comment information did not provide sufficient evidence to support a status determination. Historical information indicates that the unit was a container storage area of unknown dimension, where drums and bowsers filled with comingled spent solvent, paint thinners, and waste oils were stored prior to burning in the northern area of the Fire Department Training open burning area (SWMU No. 78). It was not known whether the drums were stored on bare soil or on an artificial surface. SWMU 80 will be retained on Permit Table 2 pending the submittal of additional comprehensive unit location and operations process and history information; all additional information pertaining to unit dimensions, capacity, and structural description; specifications of all hazardous waste, hazardous constituents or other waste managed at the unit; all available information pertaining to releases during the operational history of the unit, additional Facility records review, and investigation at the drum storage area.	No
SWMU 92-OWS No. 5120	5	Permittee comment information indicated that the results of a 1994 RFI at SWMU 92, OWS No. 5120, identified polycyclic aromatic hydrocarbons, lead, and chromium above NMED residential SSLs. The OWS was subsequently removed [1999] and any contamination would have likely also been removed during corrective measures activities. The Permittee recommended SWMU 92 be moved to Permit Table 3.	81	NMED's review of the results of corrective measures activities (2004 Corrective Action Complete Proposal), indicated that removal and sampling of SWMU 92 occurred in 1999. COCs were found to be either below laboratory detection limits or below applicable NMED residential SSLs for the analyses performed. SWMU 92 was initially moved from Permit Table 2 to Draft Facility Permit Table 3, based on the results of the corrective measure completed at the unit, which included sampling of subsurface soils below the unit and removal of the OWS. SWMU 92 will be retained on Permit Table 3.	No

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SWMU 99-Waste Water Treatment System Bar Screen	5	Permittee comment information indicated that SWMU 99, Waste Water Treatment System Bar Screen, is a concrete chamber with metal gratings. The grating was designed to catch large objects from influent and reportedly was manually cleaned. The Permittee indicated that the Waste Water Treatment Plant (WWTP) is active and managed under other permits and regulations and is covered by an associated Closure Plan. The Permittee recommended SWMU 99 be moved to Facility Permit Table 3.	82	The comment information did not provide sufficient evidence to support a status determination. Historical information indicates that the WWTP has been in operation since 1965. The WWTP may have received and Facility process wastewater containing hazardous waste or hazardous constituents from aircraft fuel spills, oils derived from maintenance activities and spills, and discarded solvents and pesticides regulated by RCRA. SWMU 99 will be retained on Facility Permit Table 2 pending closure of the WWTP, submittal of comprehensive treatment plant process and history information, a complete accounting of spills or releases at and in association with the plant, complete waste stream characterization information, submittal of any treatment plant closure plans, and information documenting investigation of any releases from or at the WWTP.	No
SWMU 100-Waste Water Treatment System Parshall Flume	5	Permittee comment information indicated that SWMU 100 Waste Water Treatment System Parshall Flume, is a concreate chamber used to measure influent flow rate, which enters the WWTP through the bar screen (SWMU 99). The Permittee indicated that the WWTP is active and managed under other permits and regulations and is covered by an associated Closure Plan. The Permittee recommended SWMU 100 be moved to Permit Table 3.	83	The comment information did not provide sufficient evidence to support a status determination. Historical information indicates that the WWTP has been in operation since 1965. The WWTP may have received and Facility process waste water containing hazardous waste or hazardous constituents from aircraft fuel spills, oils derived from maintenance activities and spills, and discarded solvents and pesticides regulated by RCRA. SWMU 100 will be retained on Permit Table 2 pending closure of the WWTP, submittal of comprehensive treatment plant process and history information, a complete accounting of spills or releases at and in association with the plant, complete waste stream characterization information, submittal of any treatment plant closure plans, and information	No

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				documenting investigation of any releases from or at the WWTP.	
AOC D-Asbestos Burial Pit	5	Permittee comment information indicated that AOC D Asbestos Burial Pit, is located near the 7th hole of the CAFB Whispering Winds Golf Course and was utilized for the disposal of waste debris from the 1950s. The Permittee indicated a level of uncertainty regarding the origin of the landfill. However, prior investigation did not result in detection of an exceedance of NMED residential SSLs. All exposed asbestos was reportedly removed from the site. A portion of the Whispering Winds Golf Course is currently maintained across the site and any remaining debris.	84	The comment information did not provide sufficient evidence to support a status determination. AOC D is an existing landfill and must remain on Table 2 of the Permit until all landfilled waste materials are completely removed from the site and a final investigation is completed. AOC D will be retained on Permit Table 2.	No
AOC E-Runway Disposal Pile	5	Permittee comment information indicated that AOC E is a 1,000-foot by 200-foot landfill, which contains debris from the demolition of a former runway. Prior investigation identified arsenic in surface soil above the NMED residential SSL.	85	The comment information did not provide sufficient evidence to support a status determination. AOC E is an existing landfill and must remain on Table 2 of the Facility Permit until all landfilled waste materials are completely removed from the site and a final investigation is completed. AOC E will be retained on Permit Table 2.	No
AOC F-Gunsight Target Berm	5	Permittee comment information indicated that AOC F was used as a backstop for bore-sighting aircraft weaponry in the 1950s and 1960s and contained items such as telephone poles and railroad ties for targets. Prior	86	The comment information did not provide sufficient evidence to support a status determination. Based on the outstanding arsenic concentrations, which exceeded the NMED residential SSL, further evaluation is warranted. AOC F will be retained on Permit Table 2.	No

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		sampling indicated that arsenic exceeded the NMED residential SSL. The Permittee recommended AOC F be moved to Permit Table 3.			
AOC D*-Aircraft Wash Rack Holding Tank	5	Permittee comment information indicated that AOC D* is a 1,000-gallon metal tank located at Building 166. The Permittee indicated that the tank was utilized to mix aircraft cleaning compound and was located within the building on a concrete platform. The Permittee indicated that no release was expected. The Permittee recommended AOC D* be moved to Permit Table 3.	87	The comment information did not provide sufficient evidence to support a status determination. Historical information indicates that AOC D* was used to dilute cleaning compound, which was then piped outside to the Aircraft Wash Rack (SWMU 9). The cleaning compound was reported to be alkaline water-based and contained 5% by weight ethylene glycol n-mono butyl ether. AOC D* will be retained on Permit Table 2 pending the submittal of additional comprehensive operations process and history information; all information pertaining to unit dimensions, capacity, and structural description; specifications of all hazardous waste, hazardous constituents, other waste, or substances managed at the unit; all available information pertaining to releases during the operational history of the unit; and/or investigation at AOC D* and the wash rack.	No
AOC E*-POL Storage Tank No. 140	5	Permittee comment information provided a tank closure date of May 11, 1992 for AOC E*, POL Storage Tank No. 140. The tank was reportedly removed on December 12, 1994. Supporting document information included a Storage Tank Closure Work Sheet and NMED Notification for Underground Storage Tank form.	88	The comment information did not provide sufficient evidence to support a status determination. Based on the provided documentation, removal of the UST was reported to the NMED as evidenced by the attached Underground Storage Tanks notification form dated May 12, 1992. The removal of the UST is supported by current NMED PSTB database information. However, no associated confirmation soil sample analysis results or supporting documentation were provided.	No

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		Storage tank record documentation indicated AOC E*, POL Storage Tank No. 140, was a 1,400-gallon steel UST utilized for diesel fuel storage. The storage tank was reportedly removed in October 1991. The storage tank Closure Work Sheet indicates that a visual inspection was conducted, as well as the collection of two "soil test" samples.		AOC E* will be retained on Permit Table 2 pending either submittal of associated storage tank removal confirmation sampling results data, or completion of investigation.	
AOC F*-POL Storage Tank No. 163	5	Permittee comment information provided a storage tank closure date of November 8, 1991 for AOC F*, POL Storage Tank No. 163. The tank was reportedly removed in September 1991. The Attached Tank Closure Work Sheet and NMED Notification for Underground Storage Tank form, which served as record of notification and removal of the storage tank, were attached to comment. The record information indicated AOC F* was a 1,400-gallon steel UST utilized for diesel fuel storage. The storage tank Closure Work Sheet indicates a visual inspection was conducted as well as the collection of two "soil test" samples.	89	The comment information did not provide sufficient evidence to support a status determination. Based on the provided document, removal of the UST was reported to the NMED as evidenced by the attached Underground Storage Tanks notification form dated May 12, 1992. The removal of the UST is supported by current NMED PSTB database information. However, no associated confirmation soil sample analysis results or supporting documentation were provided with comment information. AOC F* will be retained on Permit Table 2 pending either submittal of associated storage tank removal confirmation sampling results data, or completion of investigation.	No
AOC G*-POL Storage Tank No. 181	5	Permittee comment information indicated that AOC G*, POL Storage Tank No. 181, was removed in November 1992. The attached 1993	90	The comment information did not provide sufficient evidence to support a status determination. RFA information indicates that the UST was utilized for storage of diesel fuel and became active in 1943. No documentation of the actual	No

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		UST Removal Project memo and accompanying Attachment 1, List of Former UST Sites document indicated a storage tank abandonment date of November 1992. The UST was reported as not registered. Site condition was noted as clean in the attachment.		storage tank removal activities or associated confirmation sampling was provided with Permittee comment. Additionally, the 1993 UST Removal Project memo indicates that the storage tank was abandoned not removed. NMED PSTB database information was not available for the UST, confirming the unregistered tank status. AOC G* will be retained on Permit Table 2 pending submittal of associated storage tank removal documentation, confirmation sampling results data, or completion of subsurface investigation at the storage tank location.	
AOC H*-POL Storage Tank No. 182A	5	Permittee comment information provided a closure date for AOC H*, POL Storage Tank No. 182A, of August 23, 1994. A Tank Closure Work Sheet was attached to comment, which confirmed the storage tank closure date. The Closure Work Sheet indicated that a visual inspection was conducted and two "soil test" samples were collected during storage tank removal activities.	91	The comment information did not provide sufficient evidence to support a status determination. The provided Permittee comment information and records indicate that AOC H* was removed in August 1994. However, no documentation of reportedly collected confirmation sampling results data was provided. Available NMED PSTB database information indicated that the UST was a registered unit with a "removed" tank status. AOC H* will be retained on Permit Table 2 pending either submittal of additional storage tank removal documentation, confirmation sampling data, or completion of subsurface investigation at the storage tank location confirming a release has not occurred.	No
AOC I*-POL Storage Tank No. 182B	5	Permittee comment information indicated that AOC I*, POL Storage Tank No. 182B, was listed as Storage Tank No. 183B on the Facility Permit. The Permittee indicated that the RFA referenced AOC I* as Tank No. 182B. The unit was identified as a UST. Permittee provided information	92	The comment information did not provide sufficient evidence to support a status determination. The provided Permittee comment information and records indicate that AOC I* was removed in August 1994. However, no documentation of reportedly collected confirmation sampling results data was provided. NMED PSTB database information indicated that the UST was a registered unit with a "removed" tank status.	No

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		indicated a storage tank closure date of August 23, 1994. The Permittee attached a RFA entry page (Page 7-11), a Tank Closure Work Sheet, and a Contractor tank removal memorandum documenting the approximate removal date of the storage tank. The Closure Work Sheet indicated that a visual inspection was conducted and two "soil test" samples were collected during storage tank removal activities.		An additional listing for a removed AST was also noted in the database information. AOC I* will be retained on Permit Table 2 pending submittal of additional storage tank removal documentation, confirmation sampling results data, information providing resolution of the discrepancy associated with the AST identified in NMED records information, or completion of investigation.	
AOC K*-POL Storage Tank No. 185	5	Permittee comment information provided a closure date for AOC K*, POL Storage Tank No. 185 of November 6, 1992. The Permittee provided a Tank Closure Work Sheet and 1993 UST Removal Project memo and Attachment 1 information as supporting information. AOC K* was reportedly registered in the provided Attachment 1, List of former UST Sites for 1992. Unit condition was noted as clean with tank pit excavation reported as November 1992.	93	The comment information did not provide sufficient evidence to support a status determination. The provided Permittee comment information and records indicate that AOC K* was removed in November 1992. However, no documentation of any confirmation sampling results data collected after tank removal was provided. AOC K* will be retained on Permit Table 2 pending submittal of conclusive storage tank removal documentation and confirmation sampling result data, or completion of investigation.	Yes
AOC L*-POL Storage Tank No. 187	5	Permittee comment information provided an August 30, 1994 closure date for AOC L*, POL Storage Tank No. 187. A supporting Tank Closure Work Sheet was attached to comment. The Closure Work Sheet indicated that a visual inspection was conducted and	94	The comment information did not provide sufficient evidence to support a status determination. The provided Permittee comment information and records indicate that AOC L* was removed in August 1994. However, no documentation of reportedly collected confirmation sampling results data was provided. NMED PSTB storage tank database information indicated that the UST was a registered unit with a "removed"	No

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		two "soil test" samples were collected during storage tank removal activities.		tank status. An additional listing for a removed AST was also noted in the database information. AOC L* will be retained on Permit Table 2 pending submittal of additional storage tank removal documentation, confirmation sampling result data, information providing resolution for the discrepancy associated with the AST identified in NMED records, or completion of investigation.	
AOC R*-POL Storage Tank No. 374	5	Permittee comment information indicated that AOC R*, POL Storage Tank No. 374, was removed in December 1988. A supporting "General Notes" document was attached to comment. The provided information only served as documentation of the removal of a 10,000-gallon storage tank utilized for the storage of gasoline at Building 374.	95	The comment information did not provide sufficient evidence to support a status determination. Permittee comment and supporting document information indicated that AOC R* was removed in December 1988. However, no documentation of associated confirmation sampling conducted during tank removal activities was provided. NMED PSTB database information was not available for the UST, indicating the storage tank is potentially unregistered. AOC R* will be retained on Permit Table 2 pending either submittal of associated storage tank removal confirmation sampling result data, or completion of investigation.	Yes
AOC S*-POL Storage Tank No. 376	5	Permittee comment information indicated that AOC S*, POL Storage Tank No. 376, consisted of two storage tanks (tank 376A and 376B), which were removed in August 1991. A Notification of Underground Storage Tank form, which served as record of notification and removal of each storage tank, was also attached to comment. The information provided in the UST notification form indicated	96	The comment information did not provide sufficient evidence to support a status determination. The provided Permittee comment information and records indicate that AOC S* was removed in August 1991. However, no documentation of associated confirmation sampling and supporting information collected during tank removal activities was provided. NMED PSTB storage tank database information indicated that the USTs were registered with "removed" tank status. AOC S* will be retained on Permit Table 2 pending either submittal of associated storage tank removal confirmation	No

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		that tank 376A was utilized for the storage of kerosene. Tank 376B was reportedly utilized for the storage of diesel fuel. Both storage tanks had a capacity of 5,000-gallons. The record information also indicated the storage tanks were empty.		sampling result data and supporting tank removal documentation or completion of investigation.	