

**REVISED FINAL, VERSION 01**  
**INSTALLATION SPILL CONTINGENCY PLAN**

**FORT WINGATE DEPOT ACTIVITY**  
**MCKINLEY COUNTY, NEW MEXICO**

**April 2017**

**Contract No. W9126G-14-C-0032**

*Prepared for:*



**US Army Corps  
of Engineers®**

United States Army Corps of Engineers  
Fort Worth District  
819 Taylor Street, Room 3A12  
Fort Worth, Texas 76102

*Prepared by:*

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FWDA = Fort Wingate Depot Activity

AR = Administrative Record

BEC = Base Realignment and Closure Environmental Coordinator

USACE = United States Army Corps of Engineers

SWF = Fort Worth District

BRACD = United States Army Base Realignment and Closure Division

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## ACRONYMS AND ABBREVIATIONS

AOC	Area of Concern
AED	Automated External Defibrillator
AR	Army Regulation
AST	Aboveground Storage Tank
BEC	BRACD Environmental Coordinator
BRAC	Base Realignment and Closure
BRACD	BRAC Division
BLM	Bureau of Land Management
BTU	British Thermal Unit
CAMU	Corrective Actions Management Unit
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CFR	Code of Federal Regulations
CPR	Cardiopulmonary Resuscitation
DAIM	Department of the Army–Installation Management
DoA	United States Department of the Army
DOT	United States Department of Transportation
DPW	Department of Public Works
FWDA	Fort Wingate Depot Activity
HAZMIN	Hazardous Waste Minimization
HAZWOPER	Hazardous Waste Operations and Emergency Response
HW	Hazardous Waste
HWCP	Hazardous Waste Contingency Plan
HWMP	Hazardous Waste Management Plan
HWMU	Hazardous Waste Management Unit
HWSF	Hazardous Waste Storage Facility
IAP	Initial Accumulation Point
IDW	Investigation-Derived Waste
IRT	Installation Response Team
ISCP	Installation Spill Contingency Plan
kW	Kilowatt
LDR	Land Disposal Restriction
MEC	Munitions and Explosives of Concern
MSDS	Material Safety Data Sheet
NMAC	New Mexico Administrative Code

NMED	New Mexico Environment Department
OB/OD	Open Burning/Open Detonation
ODB	Operations Directorate–BRAC
OSC	On-Scene Coordinator
OSHA	Occupational Safety and Health Administration
PE	Professional Engineer
PM	Project Manager
POC	Point of Contact
PP	Pollution Prevention
RA	Regional Administrator
RCRA	Resource Conservation and Recovery Act
SOP	Standard Operating Procedure
SPCC	Spill Prevention, Control and Countermeasure
SPCCP	SPCC Plan
STI	Steel Tank Institute
SWMU	Solid Waste Management Unit
TEAD	Tooele Army Depot
TPMC	Terranear PMC
TSDRF	Treatment, Storage, Disposal, and Recycling Facility
U.S.	United States
USACE	United States Army Corps of Engineers
USEPA	U. S. Environmental Protection Agency
WMM	Waste Military Munitions
WSMR	White Sands Missile Range



## INTRODUCTION

The Federal Water Pollution Control Act of 1972 requires federal agencies to develop a plan for the responsible cleanup of oil and hazardous substances. Title 40 of the Code of Federal Regulations (CFR), Chapter 1, Subchapter D, Part 112 (40 CFR 112) provides the requirements for Department of Army Installation Spill Contingency Plans (ISCPs). This ISCP has been prepared per the requirements of 40 CFR 112 for the Fort Wingate Depot Activity (FWDA). Title 40 CFR 112 also provides the requirements for the preparation and implementation of Spill Prevention, Control and Countermeasure (SPCC) Plans (40 CFR 112, §112.7). In accordance with the cited regulation, a non-transportation facility is subject to SPCC regulations if:

1. The aggregate aboveground capacity of the facility exceeds 1,320 gallons (excluding those tanks and oil-filled equipment below 55 gallons in capacity), or
2. The aggregate underground capacity exceeds 42,000 gallons (excluding those that are currently subject to all of the technical requirements of 40 CFR Part 280 or all of the technical requirements of 40 CFR Part 281), or
3. Due to the location, the facility could reasonably be expected to discharge oil into or upon navigable waters of adjoining shorelines of the United States.

An SPCC Plan (SPCCP) is not required to be filed with the USEPA, but a copy must be available for onsite review by the Regional Administrator (RA) during normal working hours. The SPCCP must be submitted to the USEPA Region VI RA and the state agency (New Mexico Environment Department [NMED]) along with the other information specified in Section 112.4 (a) if either of the following occurs:

1. The facility discharges more than 1,000 gallons of oil into or upon the navigable waters of the United States or adjoining shorelines in a single spill event, or
2. The facility discharges oil in quantities greater than 42 gallons in each of two spill events within any twelve month period.

The following spill information must be submitted to the RA within 60 days if either of the above thresholds is reached. This report is to contain the following information (40 CFR Part 112.4 (a)):

1. Name of facility.
2. Name of the individual submitting the information.
3. Location of the facility.
4. Maximum storage capacity of the facility and normal daily through-put.
5. The corrective actions and/or countermeasures taken, including adequate description of equipment repairs and replacements.
6. Description of facility including maps, flow diagrams and topographical map.
7. The cause(s) of the spill(s), including a failure analysis or subsystem in which failure occurred.
8. Additional preventive measures taken or contemplated to minimize the possibility of recurrence.

9. Such other information as the RA may reasonably require that is pertinent to the plan or spill event(s).

The SPCCP must be amended within six months whenever there is a change in facility design, construction, operation, or maintenance that materially affects the facility's spill potential. The SPCCP must be reviewed at least every five years and amended to include more effective prevention and control technology, if such technology will significantly reduce the likelihood of a spill event and has been proven in the field. All such amendments must be recertified by a registered Professional Engineer (PE).

If the owners and operators of a facility that are required to prepare an SPCCP and are not required to submit a Facility Response Plan, the SPCCP should include the signed certification form titled "Certification of Substantial Harm Determination Form", provided in Attachment 1 (per Appendix C of 40 CFR 112).

## **FACILITY INFORMATION**

FWDA is located in northwestern New Mexico in McKinley County, approximately eight miles east of Gallup, New Mexico on United States (U.S.) Route 66 or Interstate 40 (Figure 1). FWDA is almost entirely surrounded by federally-owned or administered lands, including both national forest and tribal lands. The town of Fort Wingate, located immediately to the east of FWDA on Native American land, was the original fort headquarters site. To the south and southeast of FWDA is the largely-undeveloped Cibola National Forest. The land to the west is in 'checkerboard' patterned ownership, with management responsibilities divided between the Bureau of Land Management (BLM), Bureau of Indian Affairs (Navajo tribal trust land), Navajo Tribe (fee lands), and individual Native American allottees. Most of this land is undeveloped, except for the Sundance Subdivision, coal mine, and the Rehoboth Mission. These properties are located approximately 0.5 and 1.5 miles west of FWDA, respectively. The corporate limit of Gallup is located approximately eight miles east of FWDA. FWDA currently occupies approximately 24 square miles (15,277 acres) of land with facilities formerly used to operate a reserve storage facility providing for the care, preservation, and minor maintenance of assigned commodities, primarily conventional military munitions.

FWDA is an inactive U.S. Army Depot whose former mission was to receive, store, maintain, and ship assigned materials (primarily explosives and military munitions), and to dispose of obsolete or deteriorated explosives and military munitions. FWDA operated from the mid-1940s to 1993, at which time the active mission ceased and the installation closed. The installation was established as Fort Wingate in 1860. In 1941, Fort Wingate underwent major construction and expansion for the administration and igloo areas. In 1971, the depot was placed in reserve status and renamed Fort Wingate Depot Activity. Since 1975, the installation has been under the administrative command of Tooele Army Depot (TEAD), located near Salt Lake City, Utah. The active mission of FWDA ceased and the installation closed in January 1993, as a result of the Defense Authorization Amendments and Base Realignment and Closure (BRAC) Act of 1988. In 2002, the Army reassigned many functions at FWDA to the BRAC Division (BRACD), including property disposal, caretaking duties, management of caretaker staff, and performance of environmental restoration and compliance activities. TEAD retained command and control responsibilities, and continued to provide support services to FWDA until 31 January 2008. On 31 January 2008,

command and control and support functions were transferred to White Sands Missile Range (WSMR); however, the BRAC office is conducting and administering the cleanup.

The environmental restoration processes at FWDA have been underway for more than 30 years. With the exception of the Open Burning/Open Detonation (OB/OD) Area, environmental restoration activities at FWDA began in 1980 under Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) guidelines, with the USEPA Region 6 as the lead regulatory agency.

In 1996, the USEPA authorized the State of New Mexico for Resource Conservation and Recovery Act (RCRA) corrective action. Since that time, NMED has become the lead regulatory agency, and the pathway for environmental restoration has been evolving for a number of years. In 2002, NMED determined that the pathway would be a RCRA permit for post-closure care of the OB/OD Area, with a RCRA corrective action module attached to address requirements for other sites. The Permit (NM 6213820974) was finalized in December 2005, became effective 1 December 2005 and was last revised in February, 2015 (NMED, 2015).

## **INTENT AND PURPOSE**

This ISCP is intended as a guide to emergency procedures that are to be implemented in the event of a hazardous material/waste spill or release on FWDA property. This document is also intended as a reference source to familiarize local emergency response agencies, fire and police departments, and area hospitals with operations relating to hazardous materials/wastes and emergency response at FWDA.

The purpose of this ISCP is threefold:

1. To clearly outline the responsibilities of on-site management and personnel.
2. To list the available resources that can be utilized in the event of a hazardous material/waste spill or release on FWDA property.
3. To establish suitable and effective procedures to be used, if not to prevent, to contain and clean up any and all accidental leaks and spills of petroleum products (oil), hazardous materials, and/or hazardous wastes. The WSMR activities at FWDA are not included in this plan.

This ISCP is applicable to all BRACD activities generating both nonhazardous and hazardous waste at FWDA. For the purposes of this document, FWDA is considered an episodic large-quantity generator under RCRA. This ISCP has been prepared to comply with all applicable federal, state, and local laws and regulations, as well as FWDA RCRA Permit (USEPA ID No. NM6213820974).

It is the responsibility of the On-Scene Coordinator (OSC) (see Attachment 2) to modify this ISCP whenever new materials are brought into the plant or whenever operations or personnel change significantly.

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# **PART 1 SPILL PREVENTION CONTROL AND COUNTERMEASURE PLAN**

This SPCCP is developed to meet the requirements of local, county, state, and federal prevention and response plans and is implemented in conjunction with the ISCP. The ISCP specifies guidelines for response to spills outside secondary containment.

## **SECTION 1 FACILITY INTRODUCTION**

FWDA is an inactive U.S. Army Depot whose former mission was to receive, store, maintain, and ship assigned materials (primarily explosives and military munitions), and to dispose of obsolete or deteriorated explosives and military munitions. FWDA operated from the mid-1940s to 1993, at which time the active mission ceased and the installation closed. For additional facility details, see Section 2 of the ISCP, above.

## **SECTION 2 40 CFR 112.3 REQUIREMENTS TO PREPARE AND IMPLEMENT SPCCP**

### **2.1 40 CFR § 112.3 (d) PROFESSIONAL ENGINEER CERTIFICATION**

By means of this certification, I, James L. Lockhart, attest that I am familiar with the requirements of 40 CFR Part 112, that I or my designated agent have visited and examined the facility, that this SPCCP has been prepared in accordance with good engineering practice, including consideration of applicable industry standards and with the requirements of the part, that procedures for required inspection and testing have been established and that the plan is adequate for the facility.

Engineer: James L. Lockhart, P.E. Date: \_\_\_\_\_

Signature: \_\_\_\_\_

Registration Number: 17184 State: New Mexico

SEAL

## **2.2 40 CFR § 112.5 FIVE-YEAR PLAN REVIEW**

In accordance with 40 CFR 112.5 (a), FWDA periodically reviews and evaluates this SPCCP for any change in the facility design, construction, operation, or maintenance that materially affects the facility's potential for an oil discharge, including, but not limited to:

1. Commissioning or decommissioning of containers.
2. Replacement, reconstruction or movement of containers.
3. Reconstruction, replacement, or installation of piping systems.
4. Construction or demolition that might affect secondary containment.
5. Changes of product or service, revisions to standard operation, modification of testing/inspection procedures, and the use of new or modified industry standards or Maintenance procedures.

Amendments to this plan made to address changes of this nature are referred to as technical amendments, and must be certified by a Registered P.E.

Non-technical amendments can be done (and must be documented in this section) by the facility owner and/or operator. These include:

1. Change in the name or contact information (i.e. telephone numbers) of individuals responsible for the implementation of this plan.
2. Change in the name or contact information of spill response or cleanup contractors.

FWDA must make the needed revisions to the SPCCP, as soon as possible, but no later than six months from the date of the amendment.

In accordance with 40 CFR 112.5 (b), FWDA reviews the plan at least once every five years. Revisions to the plan, if needed, are made within six months of the five-year review. A Registered PE certifies any technical amendment to the plan, as described above, in accordance with 40 CFR Part 112.3 (d). This plan is dated March 2015. The next plan review is therefore, scheduled to take place on or prior to March 2020.

Scheduled reviews and plan amendments are recorded in the Five-Year Plan Review Summary Page. This log must be completed even if no administrative change will initiate a review of the plan as required.

## **2.3 40 CFR § 112.5(b) FIVE-YEAR REVIEW SUMMARY PAGE**

In accordance with 40 CFR 112.5 (b), review and evaluation of this SPCCP is conducted at least once every five years and whenever technical or non-technical amendments are warranted. These reviews and evaluations are recorded, below:

Reviewer Signature	Reviewer Print	Date	Comments	P.E Certification Required Yes/No

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## **2.4 SPILL EXPERIENCE/HISTORY**

FWDA has had no spills or releases of petroleum to the environment in the last five years.

## **2.5 40 CFR § 112.7 GENERAL REQUIREMENTS FOR SPCCPs**

### **2.5.1 40 CFR § 112.7 MANAGEMENT APPROVAL TO COMMIT THE NECESSARY RESOURCES**

I hereby certify that to the best of my abilities, this SPCCP will be implemented as herein described and the facility will commit all necessary manpower, equipment, and materials required to control expeditiously and remove any quantity of oil that may be discharged.

In accordance with 40 CFR 112.3 (e)(1), a complete copy of the SPCC is maintained at the FWDA office.

Name: \_\_\_\_\_ Title: \_\_\_\_\_

Signature: \_\_\_\_\_ Date: \_\_\_\_\_

### **2.5.2 40 CFR § 112.7 (a)(1) FACILITY CONFORMANCE**

This facility complies with the applicable requirements of 40 CFR 112.7.

### **2.5.3 40 CFR § 112.7(a)(2) FACILITY COMPLIANCE**

This facility complies with the applicable requirements of 40 CFR 112.7 (g), (h)(2), (h)(3), and (i).

### **2.5.4 40 CFR § 112.7(a)(3) FACILITY DESCRIPTION**

FWDA is located in northwestern New Mexico in McKinley County, approximately eight miles east of Gallup, New Mexico on U.S. Route 66 or Interstate 40 (Figure 1). FWDA is almost entirely surrounded by federally-owned or administered lands including both national forest and tribal lands. The town of Fort Wingate, located immediately to the east of FWDA on Native American land, was the original fort headquarters site. To the south and southeast of FWDA is the largely undeveloped Cibola National Forest. The land to the west is in ‘checkerboard’-patterned ownership, with management responsibilities divided between the BLM, Bureau of Indian Affairs (Navajo tribal trust land), Navajo tribe (fee lands), and individual Native American allottees. Most of this land is undeveloped, except for the Sundance Subdivision and coal mine and the Rehoboth Mission. These properties are located approximately 0.5 and 1.5 miles west of FWDA, respectively. The corporate limit of Gallup is located approximately eight miles west of FWDA. FWDA currently occupies approximately 24 square miles (15,277 acres) of land with facilities formerly used to operate a reserve storage facility providing for the care, preservation, and minor maintenance of assigned commodities, primarily conventional military munitions. Figure 2 shows the locations of parcels within FWDA.

### **2.5.5 40 CFR § 112.7(a)(3)(i) CONTAINER LOCATIONS, TYPE, AND CAPACITY**

See Table 1 for the container locations, type, and capacities.

## **2.5.6 40 CFR § 112.7(a)(3)(ii) DISCHARGE-PREVENTION MEASURES**

Outside contractors deliver diesel fuel for use in the facility's generators, as well as deliver hydraulic fluid drums and remove waste oil drums. FWDA or contractor personnel will be present to monitor the delivery and removal operations. Specific information regarding containment systems, drainage controls, management, and communications is provided in the following sections.

## **2.5.7 40 CFR § 112.7(a)(3)(iii) DISCHARGE OR DRAINAGE CONTROLS**

Table 1 summarizes the containment systems and drainage controls associated with each of the containers. Spill controls for the various activities are as follows:

### **ACTIVITY 1: BULK MATERIAL UNLOADING**

#### **Materials**

The material which is loaded in bulk from tanker trucks into generators is diesel fuel.

#### **Description**

Diesel fuel is unloaded at the facility's three generators located at the Hazardous Waste Management Unit (HWMU). Figure 3 shows the location of the HWMU.

#### **Spill Events**

1. Tanker Truck Unloading
2. Storage Container Overfill

#### **Spill Containment and Control**

1. **Tanker Trucking Unloading:** This occurs only during the day, on the first shift. The tanker truck driver and FWDA or contractor employee are present during the unloading. If a spill event occurs, the truck driver can act immediately to mitigate the flow of material with the application of "oil-dry" material or equipment.

There is no containment structure around the tanker truck unloading area since none is required for facilities not having loading/unloading racks. Under 40 CFR 112.7 (c), only the general oil containment rules apply. During a release occurring during unloading, the SPCCP will be initiated and sufficient manpower, equipment and materials will be made available or be deployed expeditiously to control and remove the oil/material discharged [40 CFR 112.7 (d)].

Prior to unloading a tank truck nearby storm drains will be covered to prevent a major tank truck release from reaching the waters of the state. Any release would then be removed properly and disposed of off-site pursuant to regulatory requirements.

2. None of these tanks are equipped with overfill warnings, hi-level alarms, or hi-level shut-offs. This equipment is not required because of the proximity of the storage tanks to FWDA or contractor employee responsible for monitoring this procedure.

## **ACTIVITY 2: "POINT OF USE" OF LIQUID**

### **Materials**

All of the bulk materials and containerized materials which are received and stored at this facility are used within various locations of the facility.

### **Description**

Materials are transferred within the buildings to their various "point-of-use" via containers.

### **Spill Event**

The following describes the type of conditions that could cause a spill event:

1. Leak or spill during maintenance operations

### **Spill Containment and Control**

FWDA or contractor employee(s) are present to the "point-of-use." In the event that a spill occurs, the employee can act immediately to stop the flow of material, contain the spill, and mitigate any adverse environmental impact.

## **2.5.8 40 CFR §112.7(a)(3)(iv) COUNTERMEASURES FOR DISCHARGE DISCOVERY, RESPONSE, AND CLEANUP**

**Discovery:** The individual that discovers a potential discharge of oil or hazardous material will immediately contact their immediate supervisor and FWDA Installation OSCs. When the OSC responds, the discoverer should make the statement, "This is a Spill Alert", and provide the following information:

- Discoverer's name
- Location of spill or leak
- Description and estimated quantity of material released
- Description of situation
- Whether there are any injuries
- Whether the spill or leak is continuing or contained
- Who else is on the scene
- Where the discoverer will be
- How the discoverer can be reached (radio/telephone)

<b>FWDA Installation On-Scene Coordinators</b>		
Primary	Richard Cruz	505 905-6109 505 862-2416 (cell) 505 488-2244 (home)
Alternate	Ricky Albrecht	505 905-6109 575 520-2194 (cell)

The OSCs will contact emergency services, as required.

**Response:** The individual who discovers the spill or discharge is responsible for implementing this SPCCP and the associated ISCP. The OSCs are responsible for the oversight of the spill response. Any spills will be stopped and contained by appropriately trained personnel. In some situations, it may be appropriate for the discoverer to take some remedial action to stop a leak or spill prior to the arrival of the Installation Response Team (IRT). That action might be to turn off a pump, operate a valve, etc. Remedial action by the discoverer will only be attempted if the individual has been trained to recognize the hazards associated with the material. No actions will be taken if hazardous conditions exist.

**Cleanup:** Smaller spills may be cleaned up by FWDA or contractor personnel if they are properly trained to complete the task. Larger spills may be cleaned up by FWDA personnel, properly trained contractor personnel, or spill response contractors. Sorbents, solids and recovered materials will be containerized in drums, labeled appropriately, and transported to approved disposal facilities.

### **2.5.9 40 CFR § 112.7(a)(3)(v) METHODS OF DISPOSAL OF RECOVERED MATERIALS**

Recovered materials (both discharged oil and wastes generated during cleanup) will be placed into steel drums and sealed. The drums will be labeled with contents and a licensed waste disposal contractor, capable of handling oil wastes, will be contacted to dispose of the recovered materials. Contact information for local waste-disposal contractors is presented in Attachment 2.

### **2.5.10 40 CFR § 112.7(a)(3)(vi) CONTACT LIST AND PHONE NUMBERS FOR THE FACILITY RESPONSE**

Contacts for the On-Scene Incident Commander, the National Response Center, emergency response contractors, appropriate agencies, and other emergency services are provided in Attachment 2.

**Table 1: Oil Storage Container and Containment/Drainage System Information  
Fort Wingate Depot Activity  
McKinley County, New Mexico**

<b>Container ID/Description</b>	<b>Location</b>	<b>Volume (gallons)</b>	<b>Quantity</b>	<b>Contents</b>	<b>Containment/Drainage System</b>
Generator #1 (HWMU – 40 kW)	HWMU (Parcel 3)	69	1	Diesel Fuel	In-line double-walled steel tank, berm area with impervious barrier, portable pump for rainwater removal and spill kit
Generator #2 (HWMU – 608 kW)	HWMU (Parcel 3)	409	1	Diesel Fuel	In-line double-walled steel tank, berm area with impervious barrier, portable pump for rainwater removal and spill kit
Generator #3 (HWMU – 400 kW)	HWMU (Parcel 3)	129	1	Diesel Fuel	In-line double-walled steel tank, berm area with impervious barrier, portable pump for rainwater removal and spill kit
Hydraulic Fluid	HWMU (Parcel 3)	55	2	Hydraulic Oil	55-gallon steel drum, plastic catch basin and spill kit
Waste Oil	HWMU (Parcel 3)	55	2	Waste Oil	55-gallon steel drum, plastic catch basin and spill kit
Diesel Fuel, Hydraulic Fluid	Building 006	55	5	Diesel Fuel	55-gallon steel drums, spill kit
Diesel Fuel	Contractor Fuel Staging Area in CAMU	3,000	1	Diesel Fuel	Double-walled steel tank, earthen berm area lined with heavy-duty plastic sheeting, portable pump for rainwater removal and spill kit.
Diesel Fuel	Contractor Flashing Unit Generator in CAMU	300	1	Diesel Fuel	In-line double-walled steel tank, located within portable spill-containment box; spill kit adjacent.
Diesel Fuel	Contractor ATV Fuel Staging Area- Near Building 403	500	1	Diesel Fuel	Proposed double-walled steel tank, earthen berm area lined with heavy duty plastic sheeting, portable pump for rainwater removal and spill kit.
Various	Building ('Igloo') B-1007	55			55-gallon steel drum(s) (when needed for periodic storage of hazardous waste), berm area with impervious barrier (waterproof floor and partial sidewall sealant) (Refer to photographs in Attachment 5), spill kit

Notes:

ATV – All Terrain Vehicle

CAMU – Corrective Actions Management Unit

HWMU – Hazardous Waste Management Unit

IDW – Investigation-Derived Waste

kW – kilowatt

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### **2.5.11 40 CFR § 112.7(a)(4) RESPONSE PLAN AND SPILL-INCIDENT FORM**

The Spill-Incident Form, included as Attachment 3 to this plan, will be completed as soon as possible after the discovery of and response to a spill. The form will be used to convey the necessary information to the USEPA Region 6 RA and other agencies and includes: address and phone number of the facility, date and time of discharge, type of material discharged, estimates of the quantity discharged, source, affected media, cause of discharge, injuries, mitigation activities, need for evacuation, and individuals/organizations that have been contacted.

### **2.5.12 40 CFR § 112.7(a)(5) OPERATING AND RESPONSE PROCEDURES**

General operating and response procedures are included in this plan. Attachments 2 and 4 include the emergency contact information and spill response protocol.

### **2.6 40 CFR § 112.7(b) POTENTIAL FOR EQUIPMENT FAILURE**

Sources of potential equipment failures, such as loading or unloading equipment, tank overflow, leakage, rupture or other sources of a discharge, are not located at FWDA.

### **2.7 40 CFR § 112.7(c) APPROPRIATE CONTAINMENT AND/OR DIVERSIONARY STRUCTURES OR EQUIPMENT**

#### **2.7.1 40 CFR § 112.7(c)(1)(i)**

The in-line fuel tanks of Generators 1 through 3 are double-walled tanks. Each generator filling area is contained by a berm and an impervious barrier or a catch basin, which will contain a spill from the tank or during loading operations. A portable pump will be used to remove any rainwater contained within the berm or spill basin.

#### **2.7.2 40 CFR § 112.7(c)(1)(ii)**

The 55-gallon drums of hydraulic fluid and waste oil, located in the HWMU near the plant and other equipment, are equipped with metal containment basins/drip pans. The basins surrounding the drums are adequate for containing potential discharges.

The 55-gallon drums of diesel fuel located in Building 006 are located pallets on an impervious floor. The placement and location of the containers is conducive to periodic inspection for spill or leaks that originate from the drums (Please refer to the photographs provided in Attachment 5). Absorbent spill containment material is located within the building and will be used to control any spills or leaks observed in proximity to the containers.

#### **2.7.3 40 CFR § 112.7(c)(1)(iii)**

There are no oil collection systems operating at FWDA. Pumps are available to remove rainwater only from berms and catch basins.

#### **2.7.4 40 CFR § 112.7(c)(1)(iv)**

Culverts, gutters, and other drainage systems are not used at FWDA.

### **2.7.5 40 CFR § 112.7(c)(1)(v)**

Booms and other sorbent materials are standard elements of all spill kits. During tank filling and emptying operations, diversionary booms will be used to prevent oil from migrating outside of the six containment areas.

### **2.7.6 40 CFR § 112.7(c)(1)(vi)**

Diversion ponds are not present at FWDA.

### **2.7.7 40 CFR § 112.7(c)(1)(vii)**

Retention ponds are not present at FWDA.

### **2.7.8 40 CFR § 112.7(c)(1)(viii)**

Sorbent materials are standard elements of all spill kits used at FWDA.

### **2.7.9 40 CFR § 112.7(c)(2)**

Not Applicable. FWDA is classified as an onshore facility.

## **2.8 40 CFR § 112.7(d) NON-PRACTICABLE REQUIREMENTS; INTEGRITY AND LEAK TESTING**

The requirements of 40 CFR 112.7(c), 40 CFR 112.7(h)(1), 40 CFR 112.8(c)(2), 40 CFR 112.8(c)(11), are practicable for FWDA. Periodic non-destructive integrity tests are done on bulk storage containers located in Parcel 3.

## **2.9 40 CFR § 112.7(e) INSPECTIONS AND RECORDS**

Formal inspections of all fuel and oil containers will be completed monthly by members of the HWMU Contractor in Parcel 3. Record of the inspections will be documented and signed by the inspector. During the inspection all tanks, containment systems, valves, pipelines, and other devices are inspected.

The monthly inspection Standard Operating Procedure and Monthly Preventative Maintenance Inspection report form provided in Attachment 6 will be filled out during each formal inspection, signed by the inspector and the original copy kept on file with this Plan for a period of three years.

In addition to the formal inspections, contractor personnel informally inspect oil containers, piping, containment systems, and other related equipment on a daily basis. If any leaks, spills, or other problems are ever discovered, appropriate contractor personnel will be notified and the problem will be corrected in a timely manner.

Record of integrity tests of tanks will be kept on file for a period of three years.



## **2.10 40 CFR § 112.7(f) TRAINING AND SPILL-PREVENTION PROCEDURES**

### **2.10.1 40 CFR § 112.7(f)(1) PERSONNEL TRAINING**

All fuel and oil handling personnel in the operation and maintenance of equipment at FWDA (including contractors) will require spill prevention and response training. The training will be designed to improve the safety awareness of handling oil and minimizing the potential for oil spills. The training will include the following:

- Spill Prevention.
- Recognition and Identification of Spills and Conditions that Increase the Risk of a Spill.
- Proper Notifications at FWDA.
- Recognition of Actions required for First Response to Different Types of Spills.
- Containment of Spilled Materials and Facility Drainage.
- Stoppage or Diversion of the Flow of Spilled Materials from Source.
- Hazardous Conditions Communications.
- Proper Selection and Use of Personal Protective Equipment.
- Implementation of the SPCCP and the ISCP.

Annual refresher training for spill response procedures is also conducted for the appropriate personnel. New employees are informed of spill prevention and response procedures during their initial safety training.

### **2.10.2 40 CFR § 112.7(f)(2) DESIGNATION OF ACCOUNTABLE PERSON**

The FWDA BRAC Caretaker is accountable for oil prevention at the BRAC Activities location(s) at the FWDA site.

### **2.10.3 40 CFR § 112.7(f)(3) DISCHARGE PREVENTION BRIEFINGS**

Spill prevention briefings will be completed at least once per year. The briefings will include all personnel who are required to have an understanding of this Plan. The briefing will include, at a minimum, the following:

- A review of this SPCCP and any addenda to the Plan along with a review of applicable pollution control laws and regulations.
- Discussions of any spill event, any oil storage equipment or component malfunction, and any new prevention measures implemented since the last spill prevention briefing.
- Discussion of the location and use of all spill prevention equipment (spill kits, etc.).
- Discussion of the response procedures and contact list in case of an emergency.
- Exercises in the use of any new spill prevention equipment.

A record of each annual briefing/training will be kept in the form of an attendance list (a blank list is included as Attachment 7). The record will be kept on file at the facility for a period of three

years. New employees that are assigned spill prevention responsibilities will receive facility specific SPCC training during their initial safety training.

## **2.11 40 CFR § 112.7(g) SECURITY**

Chain link fencing encloses FWDA. An additional chain link fence encloses the HWMU to prevent unauthorized entry into the area. All gates are locked when the areas are unattended.

All flow valves are located within the facility and are only accessible to contract personnel. These flow valves are kept in the closed position when in non-operating or non-standby mode.

The loading and unloading connections of all oil tanks are securely capped or blank flanged when not in use or when in standby mode for an extended period of time.

## **2.12 40 CFR § 112.7(h) TANK, TRUCK, AND RACK LOADING/UNLOADING**

This section does not apply to the facility because there are no bulk oil loading/unloading racks on site.

## **2.13 40 CFR § 112.7(i) FIELD-CONSTRUCTED ASTS**

This section does not apply to the facility, because there are no field-constructed aboveground oil containers present on site.

## **2.14 40 CFR § 112.7(j) ADDITIONAL STANDARDS**

Additional prevention standards are not applicable at FWDA. There are no more stringent requirements in New Mexico.

## **2.15 40 CFR § 112.7(k) QUALIFIED OIL-FILLED OPERATIONAL EQUIPMENT**

### **2.15.1 40 CFR § 112.7(k)(1)**

This is not applicable to FWDA. There is no qualified oil-filled operational equipment on site.

### **2.15.2 40 CFR § 112.7(k)(2)**

This is not applicable to FWDA. There is no qualified oil-filled operational equipment on site.

## **SECTION 3: 40 CFR 112.8 SPECIFIC REQUIREMENTS FOR PETROLEUM**

### **3.1 40 CFR § 112.8(a) GENERAL CONFORMANCE REQUIREMENTS**

The general requirements listed in 40 CFR § 112.7 have been met for FWDA, as described in Section 2 of this Plan.

### **3.2 40 CFR § 112.8(b) FACILITY DRAINAGE**

#### **3.2.1 40 CFR § 112.8(b)(1)**

Diked storage areas that require draining are located in Parcel 3. These include the bermed area around each generator with in-line fuel tanks (Generator #1, Generator #2, and Generator #3). The catch basins for the 55-gallon drums of waste oil and 55-gallon drums of hydraulic oil also require draining when rainwater or oil has accumulated. Drainage of the diked areas and the catch basins is completed with a portable pump. Prior to discharge of accumulated precipitation, the water is inspected for sheen or other signs of contamination. Contaminated fluids are containerized, characterized, and properly shipped to a treatment facility.

The diked storage area located within Building ('Igloo') B-1007 that comprises the less-than-90-day storage facility's secondary containment area (Please refer to the photographs provided in Attachment 5) does not generally require drainage. The roofed facility is not generally subject to the accumulation of rainwater. In the event that spillage of stored material does occur, drainage of the area will be completed with a portable pump.

#### **3.2.2 40 CFR § 112.8(b)(2)**

All retained rainwater is inspected for sheen or other signs of contamination prior to discharge to the facility drainage system.

#### **3.2.3 40 CFR § 112.8(b)(3)**

Since there is no potential for spills outside of the containment walls of the storage areas, special drainage systems are not required for the storage areas at FWDA.

#### **3.2.4 40 CFR § 112.8(b)(4)**

There are no drainage ditches at FWDA; therefore, diversion of ditches is not possible.

#### **3.2.5 40 CFR § 112.8(b)(5)**

Drainage waters are not treated at FWDA.

### **3.3 40 CFR § 112.8(c) BULK STORAGE TANKS**

#### **3.3.1 40 CFR § 112.8(c)(1)**

The containers used to store fuel oil are constructed of carbon steel or plastic. Both materials are compatible with the associated storage container's contents at the temperature and pressure conditions of storage.

### **3.3.2 40 CFR § 112.8(c)(2)**

The generators and filling area are contained by a berm and an impervious barrier or catch basin, which will contain a spill from the generator tanks or during loading operations. A portable pump is used for the removal of rainwater located within each berm.

The 55-gallon drums of hydraulic fluid and waste oil, located in the HWMU near the plant and other equipment, are equipped with metal or plastic containment basins/drip pans. The basins surrounding the drums are adequate for containing potential discharges.

The secondary containment area located within Building B-1007 is enclosed within a berm, and is outfitted with a waterproof sealant on the floor and sidewalls (Please refer to the photographs provided in Attachment 5). A portable pump is used in the event that leaking or spillage occurs in this area.

The 55-gallon drums located in Building 006 are located on raised pallets on an impervious floor. They are inspected periodically for leaks and spills.

In addition, sorbent materials and brooms are standard elements of all spill kits present throughout FWDA.

### **3.3.3 40 CFR § 112.8(c)(3)(i)**

Drainage valves from all secondary containment exposed to precipitation are normally kept closed at all times so that drainage of the containment area is not needed. Portable pumps may be used to drain secondary containment.

### **3.3.4 40 CFR § 112.8(c)(3)(ii)**

Storm water retained within secondary containment will be inspected for sheen or other evidence of contamination prior to discharge.

### **3.3.5 40 CFR § 112.8(c)(3)(iii)**

Secondary containment must be drained of precipitation. Drain valves will be opened (if drain valves are used) to drain containment areas and immediately closed when draining is complete. Portable pumps may be used to drain secondary containment of precipitation if drain valves are not present. Either FWDA employees or contractor personnel will supervise the operation.

### **3.3.6 40 CFR § 112.8(c)(3)(iv)**

Whenever a containment berm or catch basin is emptied, the following information will be recorded in a field logbook: date, time, duration of drainage, gallons transported, personnel supervising drainage, and tracking information (e.g., manifest numbers) on any waste manifests associated with transported material.

### **3.3.7 40 CFR § 112.8(c)(4)**

Not applicable to FWDA because buried metallic storage tanks are not present.

### **3.3.8 40 CFR § 112.8(c)(5)**

Not applicable to FWDA because partially-buried or bunkered metallic storage tanks are not present.

### **3.3.9 40 CFR § 112.8(c)(6)**

All three in-line generator tanks are visually inspected monthly for signs of deterioration, discharges, or accumulation of oil inside diked areas as described in Section 2.5 of this Plan.

The 55-gallon drums of hydraulic fluid will be fully inspected upon delivery. The 55-gallon waste oil drums will be fully inspected prior to filling.

The personnel completing the inspections are familiar with the storage operations, characteristics of the liquids stored, types of containers and their associated components. The scope of the inspections is presented in Section 2.5 and focuses on detecting any change in container conditions and signs of product leakage from the containers. If signs of leakage or deterioration are observed, the container will either be replaced or inspected by a Certified Tank Inspector to assess its suitability for continued service.

The containers' typical configuration, combined with monthly inspections, ensure that any small leaks that could develop in the tank shell will be detected before it can become significant, escape the secondary containment, and reach the environment. This approach provides environmental protection equivalent to the non-destructive shell evaluation component of integrity testing required under § 112.8(c)(6) since it provides an appropriate and effective means of assessing the conditions of the tanks and their suitability for continued service. The test and inspection forms will be kept on file for a period of three years.

### **3.3.10 40 CFR § 112.8(c)(7)**

Internal heating coils are not used in the bulk oil storage tanks.

### **3.3.11 40 CFR § 112.8(c)(8)(i-v)**

A direct audible or code-signal communication between the container gauger and filler is employed while filling the generator tanks. The tanks are filled via fueling truck and also employ a level gauge and high-level indicator. Hydraulic oil is manually pumped from 55-gallon drums to the equipment. Waste oil is dumped into the 55-gallon waste oil drums. Site workers are present for and observe all oil transfer operations. The following filling procedures will be used for all tanks:

- Verify sorbent materials are near the container area.
- Visually verify that the container will receive product and that there is sufficient free capacity.
- Visually monitor the filling operation and utilize a direct audible or code-signal communication between the container gauger and filler.

For any tanks that have a level gauge with a high-level indicator, the level gauge will be tested at least every five years to verify proper function.

### **3.3.12 40 CFR § 112.8(c)(9)**

Effluent treatment facilities are not used at FWDA.

### **3.3.13 40 CFR § 112.8(c)(10)**

Visually detected discharges from oil containers will be corrected promptly following detection. Discharges may include, but are not limited to, leaks from seals, gaskets, seams, rivets, welds, piping, pumps and bolts. Any spilled or leaked oil will be promptly cleaned up.

### **3.3.14 40 CFR § 112.8(c)(11)**

Secondary containment basins are located under every oil storage container. In addition, spill kits are located near all oil storage containers.

## **3.4 40 CFR § 112.8(d) TRANSFER OPERATIONS**

### **3.4.1 40 CFR § 112.8(d)(1)**

This section does not apply to FWDA because buried oil transfer piping is not present at the facility.

### **3.4.2 40 CFR § 112.8(d)(2)**

Terminal connections will be blank flanged or capped when not in service.

### **3.4.3 40 CFR § 112.8(d)(3)**

This section does not apply to FWDA because pipe supports are not used at FWDA.

### **3.4.4 40 CFR § 112.8(d)(4)**

Aboveground valves and related appurtenances are subjected to regular examinations by operating personnel, at which time the general condition of items such as flange joints, expansion joints, valve glands and bodies, catch pans, pipeline supports, valve locks, and metal surfaces are assessed.

### **3.4.5 40 CFR § 112.8(d)(5)**

The operator of any vehicle entering the facility will be notified of the location of any aboveground piping or other oil-transfer operations.

## **3.5 40 CFR § 112.9 SPILL PREVENTION, CONTROL, AND COUNTERMEASURE PLAN REQUIREMENTS FOR ONSHORE OIL PRODUCTION FACILITIES (EXCLUDING DRILLING AND WORKOVER FACILITIES)**

This section does not apply to FWDA because onshore oil production operations are not conducted at the facility.

**3.6 40 CFR § 112.10 SPILL PREVENTION, CONTROL, AND COUNTERMEASURE PLAN REQUIREMENTS FOR ONSHORE OIL DRILLING AND WORKOVER FACILITIES**

This section does not apply to FWDA because onshore oil drilling is not conducted at the facility, and no onshore oil drilling workover facilities are present at FWDA.

**3.7 40 CFR § 112.11 SPILL PREVENTION, CONTROL, AND COUNTERMEASURE PLAN REQUIREMENTS FOR OFFSHORE OIL DRILLING, PRODUCTION, OR WORKOVER FACILITIES**

This section does not apply to FWDA because offshore oil drilling is not conducted at the inland, landlocked facility and no offshore oil drilling production or workover facilities are present at FWDA.

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## **PART 2 INSTALLATION SPILL CONTINGENCY PLAN**

### **SECTION 1 FACILITY INTRODUCTION**

FWDA is located in northwestern New Mexico in McKinley County, approximately eight miles east of Gallup, New Mexico on U.S. Route 66 or Interstate 40 (Figure 1). FWDA is almost entirely surrounded by federally-owned or administered lands, including both national forest and tribal lands. The town of Fort Wingate, located immediately to the east of FWDA on Native American land, was the original fort headquarters site. To the south and southeast of FWDA is the largely undeveloped Cibola National Forest. The land to the west is in ‘checkerboard’-patterned ownership, with management responsibilities divided between the BLM, Bureau of Indian Affairs (Navajo tribal trust land), Navajo tribe (fee lands), and individual Native American allottees. Most of this land is undeveloped, except for the Sundance Subdivision and coal mine, as well as the Rehoboth Mission. These properties are located approximately 0.5 and 1.5 miles west of FWDA, respectively. The corporate limit of Gallup is located approximately eight miles west of FWDA. FWDA currently occupies approximately 24 square miles (15,277 acres) of land with facilities formerly used to operate a reserve storage facility providing for the care, preservation, and minor maintenance of assigned commodities, primarily conventional military munitions.

FWDA is an inactive U.S. Army Depot whose former mission was to receive, store, maintain, and ship assigned materials (primarily explosives and military munitions), and to dispose of obsolete or deteriorated explosives and military munitions. FWDA operated from the mid-1940s to 1993, at which time the active mission ceased and the installation closed. The installation was established as Fort Wingate in 1860. In 1941, Fort Wingate underwent major construction and expansion for the administration and igloo areas. In 1971, the depot was placed in reserve status and renamed Fort Wingate Depot Activity (MKM Engineers, Inc. 2008). Since 1975, the installation has been under the administrative command of the TEAD, located near Salt Lake City, Utah. The active mission of FWDA ceased and the installation closed in January 1993, as a result of the Defense Authorization Amendments and BRAC Act of 1988. In 2002, the Army reassigned many functions at FWDA to the BRACD, including property disposal, caretaking duties, management of caretaker staff, and performance of environmental restoration and compliance activities. The TEAD retained command and control responsibilities, and continued to provide support services to FWDA until 31 January 2008. On 31 January 2008, command and control and support functions were transferred to WSMR; however, the BRAC office is conducting and administering the cleanup (TPMC, 2008).

The environmental restoration processes at FWDA have been underway for more than 30 years. With the exception of the OB/OD Area, environmental restoration activities at FWDA began in 1980 under CERCLA guidelines, with the USEPA Region 6 as the lead regulatory agency.

In 1996, the USEPA authorized the State of New Mexico for RCRA corrective action. Since that time, NMED has become the lead regulatory agency, and the pathway for environmental restoration has been evolving for a number of years. In 2002, NMED determined that the pathway would be a RCRA permit for post-closure care of the OB/OD Area, with a RCRA corrective action module attached to address requirements for other sites. The Permit (NM 6213820974) was finalized in December 2005, became effective 1 December 2005 and was last revised in February, 2015 (NMED, 2015).

## **SECTION 2 40 CFR 264 GENERAL REQUIREMENTS**

### **2.1 40 CFR 264 SUBPART D—CONTINGENCY PLAN AND EMERGENCY PROCEDURES**

#### **2.1.1 40 CFR 264.50 APPLICABILITY**

The facility complies with all the applicable requirements of 40 CFR 264.50 through 264.56. The requirements of this part pertain to owners and operators of all facilities which treat, store, or dispose of hazardous waste.

#### **2.1.2 40 CFR 264.51 PURPOSE AND IMPLEMENTATION OF CONTINGENCY PLAN**

The Contingency Plan must be designed to minimize hazards to human health and the environment from fires, explosions, or any unplanned sudden or gradual release of hazardous waste to the air, water, or environment.

#### **2.1.3 40 CFR 264.52 CONTENT OF CONTINGENCY PLAN**

##### **2.1.3.1 40 CFR 264.52(a)**

The Contingency Plan must describe the actions facility personnel must take to comply with 264.51 through 264.56 in response to hazards described above. See Attachment 8, "Facility Emergency Response Contacts," and Part 4, "Installation Hazardous Waste Management Plan," of this ISCP.

##### **2.1.3.2 40 CFR 264.52(b)**

This Plan covers all BRACD activities at FWDA. Contractors at individual work sites that handle hazardous waste may develop their own SPCCP or work to the requirements of the SPCCP associated with this ISCP. The operator of the HWMU established their own SPCCP prior to the issuance of this FWDA BRAC activity-wide SPCCP. Any generator of hazardous waste outside of the HWMU must be trained on this ISCP and SPCCP.

##### **2.1.3.3 40 CFR 264.52(c)**

The United States Army Corps of Engineers (USACE) is currently requesting agreements for emergency response services with the local providing agencies. Once obtained, current copies of the arrangements with the local fire, police, hospitals, and response teams will be provided under separate cover. A route map from FWDA to Rehoboth McKinley Christian Hospital in Gallup, New Mexico is provided on Figure 4. A route map from FWDA to the nearest Level 1 Trauma Center in Albuquerque, New Mexico is provided on Figure 5.

##### **2.1.3.4 40 CFR 264.52(d)**

Emergency Response Coordinators' contact information including names, addresses, and phone numbers are provided in Attachment 2.

##### **2.1.3.5 40 CFR 264.52(e)**

A list of emergency equipment is provided in Attachment 9.

### **2.1.3.6 40 CFR 264.52(f)**

A copy of the FWDA Evacuation Plan is provided in Attachment 10.

### **2.1.4 40 CFR 264.53 COPIES OF PLAN**

Copies of the Contingency Plan are to be maintained at the facility and copies given to the local police, fire, hospitals, and response teams.

### **2.1.5 40 CFR 264.54 AMENDMENT OF PLAN**

16.12 CFR 264.54 amendment of the plan is to be made whenever one of the following occurs:

- The facility permit is revised.
- The plan fails in an emergency.
- List changes occur regarding the Emergency Coordinators or emergency equipment.
- Or there are changes to facility material that increase the potential for fires, explosions, or the release of hazardous chemicals.

### **2.1.6 40 CFR 264.55 EMERGENCY COORDINATOR**

The Emergency Coordinators are listed in Attachment 2.

### **2.1.7 40 CFR 264.56 EMERGENCY PROCEDURES**

Emergency Procedures are provided in Attachment 4.

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## **PART 3 RCRA CONTINGENCY PLAN**

### **1.0 40 CFR 264 SUBPART D—CONTINGENCY PLAN AND EMERGENCY PROCEDURES**

#### **1.1 40 CFR 264.50 APPLICABILITY**

The facility complies with all the applicable requirements of 40 CFR 264.50 through 264.56. The requirements of this part pertain to owners and operators of all facilities which treat, store, or dispose of hazardous waste.

#### **2.0 40 CFR 264.51 PURPOSE AND IMPLEMENTATION OF CONTINGENCY PLAN**

This Contingency Plan is designed to minimize hazards to human health and the environment from fires, explosions, or any unplanned sudden or gradual release of hazardous waste to the air, water, or environment.

The provisions of this plan will be carried out whenever there is a fire, explosion, or release of hazardous waste or hazardous waste constituents which could threaten human health or the environment.

#### **3.0 40 CFR 264.52 CONTENT OF THE CONTINGENCY PLAN**

##### **3.1 40 CFR 264.52(a)**

The Contingency Plan must describe the actions facility personnel must take to comply with 264.51 through 264.56 in response to hazards described above. See Attachment 8, "Facility Emergency Response Contacts," and Part 4, "Installation Hazardous Waste Management Plan," of this ISCP.

##### **3.2 40 CFR 264.52(b)**

The hazardous waste response actions are incorporated into the SPCCP (Part 1) in accordance with 40 CFR 112. When modifications are made to non-RCRA provisions in the SPCCP, the changes do not trigger the need for a RCRA Permit modification.

##### **3.3 40 CFR 264.52(c)**

Copies of the arrangements with the local fire, police, hospitals, and emergency response teams are included in Attachment 11.

##### **3.4 40 CFR 264.52(d)**

Contact information for the Emergency Response Coordinators, including names, addresses, and phone numbers, are included in Attachment 2.

##### **3.5 40 CFR 264.52(e)**

Attachment 9 includes a listing of all emergency equipment at FWDA.

### **3.6 40 CFR 264.52(f)**

The Evacuation Plan for FWDA is included in Attachment 10.

### **4.0 40 CFR 264.53 COPIES OF CONTINGENCY PLAN**

Copies of this plan will be maintained at the facility and copies are given to each of the emergency response organizations identified in Attachment 2.

### **5.0 40 CFR 264.54 AMENDMENT OF CONTINGENCY PLAN**

An amendment of the plan is to be made whenever one of the following occurs:

- The facility permit is revised.
- The plan fails in an emergency.
- The list of the Emergency Coordinators changes.
- The list of emergency equipment changes.
- There are changes to facility material that increase the potential for fires, explosions, or the release of hazardous chemicals.

### **6.0 40 CFR 264.55 EMERGENCY COORDINATOR**

The Emergency Coordinators are listed in Attachment 2.

### **7.0 40 CFR 264.56 EMERGENCY PROCEDURES**

Emergency Procedures are included in Attachment 4.

## **PART 4 INSTALLATION HAZARDOUS WASTE MANAGEMENT PLAN**

### **1.0 INTRODUCTION**

In 1976, the U.S. Congress passed the RCRA which was the nation's first comprehensive law regulating solid and hazardous waste. The resulting regulations published in 1980 provide for the control of hazardous wastes from the point of generation through final disposal. The RCRA provides regulatory agencies with a wide range of enforcement power. Violators of these regulations may face monetary penalties as well as imprisonment. The goal of this plan is to ensure that all hazardous waste generated, accumulated, stored, or treated at this installation is managed in compliance with State and Federal RCRA regulations and Army regulations. It is also a goal to ensure the protection of human health and environment through established waste management procedures. The development and implementation of this Installation Hazardous Waste Management Plan is required by Army Regulation (AR)-200-1, Environmental Protection and Enhancement (DoA, 1997).

### **2.0 HAZARDOUS WASTE**

The Facility Manager, Mark Patterson (BRACD), can generate hazardous waste at FWDA.

FWDA has been assigned USEPA identification number NM6213820974 for the generation, storage, and treatment of hazardous wastes. Specific hazardous wastes generated at this installation at any one time vary according to the specific operation being conducted. For the purposes of this document, FWDA is considered an episodic large-quantity generator under the RCRA.

In 1996, the USEPA authorized the State of New Mexico for RCRA corrective action. Since that time, the NMED has become the lead environmental regulatory agency at FWDA, and the pathway for environmental restoration has been evolving for a number of years. The potential for these operations to generate hazardous waste exists.

### **3.0 HAZARDOUS WASTE TREATMENT AND STORAGE FACILITIES**

The Corrective Action Management Unit (CAMU) is a hazardous waste treatment unit located in SWMU 14 in Parcel 3 (See Figure 3 and Attachment 5, Photographic Log), and is authorized to treat eligible waste in accordance with 40 CFR Part 264.552 and Subpart X. Waste permitted for treatment at the CAMU includes hazardous waste in the form of Waste Military Munitions (WMM) that cannot be transported offsite for treatment or disposal due to inherent hazards related to transport or management of the waste (NMED, 2005).

The CAMU is currently being used for OB or OD of munitions and explosives of concern (MEC) due to a removal action in the HWMU to remove debris and MEC from the site soils. Wastes that may be generated from this process include post-burn ash and soils with contaminant concentrations high enough to be considered hazardous (URS, 2013). The CAMU has two primary treatment cells which consist of adjacent areas that are partially enclosed by earthen berms.

One is designated for OB operations and the other for OD operations. There are also eight earth-covered igloos in Igloo Block B which are used for longer-term storage of WMM prior to treatment in the CAMU.

Also located in the CAMU is a flashing unit that consists of a propane-fueled, trailer-mounted car bottom furnace outfitted with a six million British thermal unit (BTU) dual burner. The unit has a maximum operating temperature of 1,000 °F and is controlled with automated thermostatic modulation for achieving the target temperature range. The remotely-controlled unit utilizes a logger to record operating parameters and has a minimum capacity of 2,000 pounds-per-cycle. It is used to conduct thermal flashing of munitions debris from the HWMU, after which the debris is determined to be safe and free of explosives. The debris is then classified as scrap metal and subsequently shipped to a metals recycling facility where it undergoes smelting and is then used to manufacture reinforcing bar (i.e., ‘rebar’) for use in construction applications.

The Less-Than-90-Day Hazardous Waste Storage Facility (HWSF) is located inside of Igloo B-1007 (see Attachment 5, Photographic Log). An area in the back of the igloo has been modified to comply with 40 CFR 265 Subpart DD, Containment Buildings. The containment area measures 30 feet by 20 feet and has a concrete curb creating a secondary containment area with the capacity to hold approximately 400 cubic feet. A concrete ramp was constructed to facilitate dolly access into and out of the containment area. An anti-skid epoxy coating covers the floor, curb, and the bottom four feet of the igloo walls. All interior drains have been plugged with non-shrink grout. Figure 6 in this Hazardous Waste Management Plan (HWMP) shows the location of Storage Igloo B-1007.

#### **4.0 OPERATIONAL PROCEDURES**

FWDA will comply with the USEPA and NMED operational requirements for “Less-Than-90-Day” facilities. The RCRA Container Storage Area Checklist is provided as Attachment 12, and the Waste Management Guidelines are provided as Attachment 13 for FWDA. Generally, the HWSF must use U.S. Department of Transportation-approved containers (no tanks) and waste must be stored and handled in a manner that will prevent container rupture or leak. Containers used to store hazardous waste must be kept closed at all times, except when waste is being added to or removed from the container. Containers must not be overfilled. Containers must be electrically grounded and bonded when transferring Class 1 liquids in outside storage areas. When transferring Class 1 liquids in inside storage areas, transfer of flammable liquids from one container to another will be done when containers are electrically interconnected (bonded). Drums and other containers must be handled and transported with the proper equipment designed for the task. Containers must be secured to pallets before moving the pallets. Drums must not be stacked more than two high and drums containing flammable liquids should not be stacked at all. Containers should be stored in an area away from or protected from damage due to the movement of vehicles such as trucks, fork lifts, privately owned vehicles, etc.

#### **4.1 HAZARDOUS WASTE INVENTORY**

The Less-than-90-Day storage facility (Building or ‘Igloo’ B-1007) receives waste from various initial accumulation points (IAPs) and waste accumulates at the facility for less than 90 days. A copy of the current Hazardous Waste Tracking Log (Attachment 14) is maintained at the facility. Updates to the inventory of hazardous wastes are necessary to maintain an accurate list in compliance with federal and state laws. The Hazardous Waste Tracking Log is to be completed as drums/containers are placed into the Less-Than-90-Day unit and at the time of shipment. All drums/containers are to be shipped within 90 days. The manifest is to be returned from the



Treatment, Storage, Disposal, and Recycling Facility (TSDRF) within 30 days of the shipment date.

## **4.2 HAZARDOUS WASTE MANAGEMENT PROCEDURES**

FWDA manages all hazardous waste under accumulation standards. Day-to-day hazardous waste management occurs primarily in IAPs and the HWSF. The HWMP prohibits hazardous waste management in tanks and restricts storage of hazardous waste to the HWSF.

## **4.3 INITIAL ACCUMULATION POINTS/SATELLITE ACCUMULATION AREA**

Each IAP is located at or near the point of generation, and waste is accumulated at the IAP under the control of the IAP manager for the organization generating the waste(s). Figure 6 shows the potential location of IAPs. The IAP manager must ensure that no more than 55 gallons of hazardous waste or one quart of acutely hazardous waste is accumulated at each IAP. The container log will be completed when adding waste to a container (Attachment 15). Once a quantity in excess of 55 gallons is reached, the container must immediately be marked with the date the limit was reached and, within three days, the waste must be characterized in accordance with the RCRA Permit (NM6213820974). Once the waste is characterized as hazardous, it must be transferred to the Less-Than-90-Day building (Building B-1007) or other approved facility. Hazardous waste must be collected in closed containers, and the IAP manager must maintain the Hazardous Waste Tracking Log (Attachment 14) for each IAP container. Use of tanks for management of hazardous waste is strictly forbidden.

## **4.4 TURN-IN AND DISPOSAL PROCEDURES**

After accumulation at the point of generation (i.e. IAP), hazardous waste generated at FWDA is picked up and transferred to the Less-Than-90-Day storage unit. Personnel should inspect the container(s) and container logs (Attachment 15) and conduct a cursory inspection of the IAP prior to accepting the container for transfer to the HWSF. The Less-Than-90-Day accumulation period begins when the container leaves the IAP and is transferred to the Less-Than-90-Day storage unit.

## **4.5 INSPECTION OF THE HWSF**

Hazardous waste stored at the HWSF will be inspected weekly. During the inspection, areas of container storage must be examined for leakage or spillage, deterioration of containers, and general deterioration of the area in which the containers are placed. Each inspection must be documented in writing and will include the name of the inspector, the location of the HWSF, the date and time of the inspection, a list of any problems detected, and a description of corrective actions taken. FWDA must maintain inspection records for at least three years from the date of each inspection. A copy of the RCRA Storage Container Inspection Checklist (Attachment 12) is provided.

## **4.6 PERMITS AND RECORDKEEPING**

The HWSF is covered by RCRA Permit Number NM6213820974. By removing any hazardous wastes or hazardous constituent during closure operations at FWDA, hazardous waste may be generated and must be handled in accordance with all applicable requirements of 20.4.1.300 New

Mexico Administrative Code (NMAC), incorporating 40 CFR Part 262. FWDA does not have a permitted TSDRF. Day-to-day hazardous waste management utilizes the IAPs and the HWSF.

RCRA requires the creation and maintenance of certain records for hazardous waste operations. Table 2 contains a list of appropriate files and records, retention times, and regulatory reference or citation. Such records, as are necessary and required, will be maintained and made available to regulatory agencies in accordance with applicable regulations.

## **4.7 REPORTING**

### **4.7.1 NOTIFICATIONS**

The IAP Manager will notify the FWDA Caretaker when waste is generated, containerized, sampled for characterization, and the location of the waste. The FWDA Caretaker will coordinate the characterization and final disposition of the waste with the IAP Manager and subcontractors. The FWDA Caretaker will notify USACE when waste is containerized, sampled, characterized, moved to the appropriate storage area (HWSF if it is hazardous), and its final disposition.

### **4.7.2 BIENNIAL REPORTS**

Biennial Waste Summary Reports of hazardous waste activity are to be submitted to NMED by 1 March of each even-numbered year. The report covers facility activities during the previous calendar year(s) in accordance with 20.4.1.500 NMAC (incorporating 40 CFR 264.75). The Waste Summary Report will contain the types, quantities, frequency, and ultimate destination of all hazardous waste exported.

### **4.7.3 EMERGENCY INCIDENT REPORTS**

In the case of an emergency incident, the installation on-site coordinator will notify the TEAD Environmental Office and BRACD immediately of any incident that requires implementing the Hazardous Waste Contingency Plan. The TEAD Environmental Office is responsible for making the required telephone notifications to Federal, State, and Army agencies within 24 hours following the procedure in this plan.

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Mark A. Patterson,  
Base Environmental Coordinator  
BRACD  
Fort Wingate Depot Activity



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Charles Broom  
Project Manager  
Sundance Consulting, Inc.

**Table 2: RCRA Record Retention Times  
Fort Wingate Depot Activity  
McKinley County, New Mexico**

<b>Reports/Files</b>	<b>Retention Time</b>	<b>Regulatory Reference</b>
Hazardous Waste Determination Document	3 years from the date the waste was last sent to a TSDRF <sup>+</sup>	40 CFR § 268.7(a)(8)
Biennial Report	3 years from the due date of the report <sup>+</sup>	40 CFR § 262.41
Hazardous Waste Manifest	5 years from the date the hazardous waste was accepted by the initial transporter <sup>+</sup>	40 CFR § 262.20
90-Day Accumulation Facility Inspection Logs	3 years from the due the inspection was conducted <sup>+</sup>	40 CFR § 262.34, 40 CFR § 265.15(d), 40 CFR § 265.174
Exception Reports	3 years from the due the inspection was conducted <sup>+</sup>	40 CFR § 262.42
Land Disposal Restriction Notice and Certification	3 years from the due date of the report <sup>+</sup>	40 CFR § 268.7(a)(8)
Notification of Intent to Export Waste	5 years from the date the waste was last sent to a TSDRF <sup>+</sup>	40 CFR § 262.53
USEPA Acknowledgement of Consent (for Reports)	3 years from the date the hazardous waste was accepted by the initial transporter <sup>+</sup>	40 CFR § 262.52; 40 CFR § 262.53
Waste Export Confirmation of Delivery	3 years from the date the hazardous waste was accepted by the initial transporter <sup>+</sup>	40 CFR § 262.54
Annual Report (required of primary exporters of hazardous waste)	3 years from the date the hazardous waste was accepted by the initial transporter <sup>+</sup>	40 CFR § 262.56
Employee Training Records	Current Personnel: Until closure of facility; Former Personnel: 3 years from the date the individual last worked at facility <sup>+</sup>	40 CFR § 264.16

Notes:

<sup>+</sup>: The periods of retention are extended automatically during the course of any unresolved enforcement action or as requested by the USEPA.

CFR = Code of Federal Regulations

RCRA = Resource Conservation and Recovery Act

TSDRF = Treatment, Storage, Disposal, and Recycling Facility

USEPA = United States Environmental Protection Agency

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# **PART 5 HAZARDOUS WASTE MINIMIZATION AND POLLUTION PREVENTION PLAN**

## **1.0 INTRODUCTION**

Under the originally-promulgated RCRA, the USEPA had focused its primary efforts on the development and implementation of hazardous waste regulations for controlling the generation, storage, treatment, and disposal practices of hazardous wastes. Only with the passing of the RCRA Amendments of 1984, and the Pollution Prevention Act of 1990, was the emphasis expanded to include the literal meaning of "Resource Conservation and Recovery". The Hazardous and Solid Waste Amendments of 1984 established a national policy guideline for the reduction of hazardous waste with the following goals in mind:

1. Reduce or eliminate, where feasible, the generation of waste.
2. Treat, store, and dispose of waste in such a manner as to minimize present and future threats to human health and the environment.
3. Minimization is limited; however, an attempt is being made to recycle with guidance.
4. FWDA manages and stores hazardous waste, as well as non-hazardous material, in accordance with this plan.

## **2.0 THE POLLUTION PREVENTION ACT OF 1990**

The Pollution Prevention Act of 1990 established a national policy which states that:

1. Pollution should be prevented or reduced at the source, whenever possible.
2. Pollution that cannot be prevented should be recycled in an environmentally safe manner, whenever possible.
3. Pollution that cannot be prevented or recycled should be treated in an environmentally safe manner, whenever feasible.
4. Disposal or other releases into the environment should be employed only as a last resort and should be conducted in an environmentally safe manner.

Generators of hazardous waste are to have a program in place to reduce the volume/quantity and toxicity of each waste to the degree determined by the generator to be economically practical. In turn, this program is to be certified by a responsible person and is stated on each manifest/shipping order, effective 1 September 1985.

The BRACD incorporates a Hazardous Waste Minimization/Pollution Prevention (HAZMIN/PP) Plan. This policy is to minimize to the maximum extent economically feasible and practical the volume and toxicity of wastes generated. Emphasis is on source reduction or elimination.

## **3.0 PURPOSE**

The purpose of this HAZMIN/PP Plan is to provide FWDA with a specific plan of action to:

1. Reduce the installation's generation of hazardous wastes.
2. To reduce pollution releases from the installation.

## **4.0 SCOPE**

This plan covers all hazardous wastes regulated by federal RCRA regulations and state equivalent rules, multi-media pollution releases, and all used oils not destined for recycling that are generated as a result of FWDA activities.

## **5.0 BACKGROUND**

FWDA background information is provided in Section 2.0 of this Plan.

All waste-generating activities have been a result of closure and cleanup activities as part of an environmental cleanup effort.

## **6.0 PROGRAM MANAGEMENT**

The HAZMIN/PP Program will be managed in accordance with AR 420-47 and AR 200-1 (DoA, 1985; DoA, 1997), the Installation Hazardous Waste Management Plan, and this HAZMIN/PP Plan. The FWDA Facility Manager is Mark Patterson (BRACD).

## **7.0 TRAINING**

This installation requires that personnel involved in handling and management of hazardous waste have 40 hours of Hazardous Waste & Emergency Response Standard Training with an 8-hour Occupational Health and Safety Agency (OSHA) refresher course annually. Potential hazards associated with material that employees may become exposed to at FWDA are reviewed with those employees at assignment to the operation and annually thereafter. Training on the implementation of this plan is provided annually to personnel. Detailed training requirements, certifications, and job titles for FWDA personnel are provided in Attachment 16.

## **8.0 PROCESS INVENTORY**

The FWDA recycling program consists of: paint, aluminum cans, fluorescent bulbs, paper, and plastic. All Investigation-Derived Waste (IDW) is fully characterized to determine whether it is hazardous or non-hazardous. It is completed by the twenty times dilution rule when possible. Due to the conservative nature of that rule, material that may have been classified as hazardous should have been classified as non-hazardous in the past.

## **9.0 HAZMIN/PP ACTIONS**

Due to the limited nature of the waste generating activities at FWDA, waste minimization efforts are conducted as part of routine operations. Therefore, the costs of implementation and cost savings for these efforts are not readily available.

## **10.0 HAZMIN GENERATION/PP REPORT**

FWDA will provide an annual HAZMIN Generation PP Report summarizing HAZMIN/PP data for the previous calendar year. FWDA will generate standardized reports as required by the Environmental Quality Reports. The current Environmental Quality Report entered into the database includes information on:

1. Storm Water Permits
2. Solid Hazardous Waste generated per calendar year
3. Recycling material generated per calendar year

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## REFERENCES

- Army Regulation (AR) 200-1, 1997.** Environmental Protection and Enhancement, Headquarters Department of the Army. 21 February.
- AR 420-47, 1985.** Solid and Hazardous Waste Management, Headquarters Department of the Army. 1 January.
- CFR, 2015.** Title 32, Part 650: Environmental Protection and Enhancement (AR 200-1).
- Code of Federal Regulations (CFR), 2015.** Title 40: Protection of Environment.
- New Mexico Administrative Code (NMAC), 2009.** Title 20 - Environmental Protection, Chapter 4 - Hazardous Waste, Part 1 – Hazardous Waste Management, Section 300 – Adoption of 40 CFR Part 262. 1 March.
- NMED, 2005.** RCRA Permit, USEPA ID No. NM 6213820974. New Mexico Environment Department Hazardous Waste Bureau. 1 December.
- Steel Tank Institute (STI), 2011.** SP001 Standard for the Inspection of Aboveground Storage Tanks. 16 September.
- TerranearPMC (TPMC), 2008.** Summary Report of Historical Information, OB/OD Unit HWMU and Parcel 3 SWMUs and AOCs, Fort Wingate Depot Activity, McKinley County, New Mexico. June.
- URS, 2013.** OB/OD Unit Hazardous Waste Contingency Plan, Fort Wingate Depot Activity. June 2013.

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## FIGURES

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Figures

Revised Final, Version 01, Installation Spill Contingency Plan  
Fort Wingate Depot Activity – McKinley County, New Mexico  
Sundance Consulting, Inc. – April 2017

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**FIGURE 1**

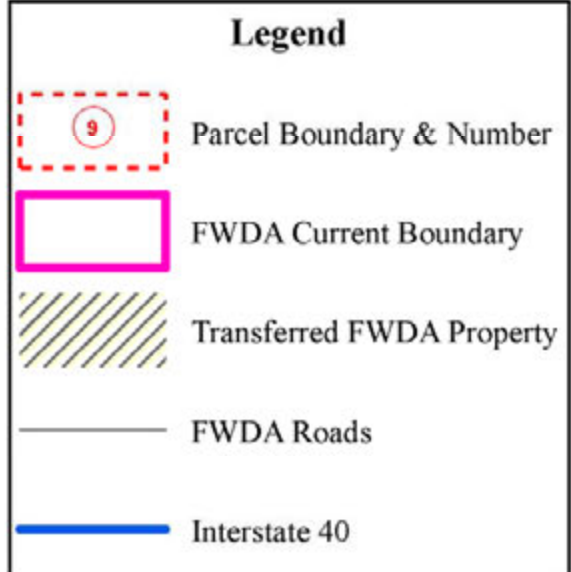
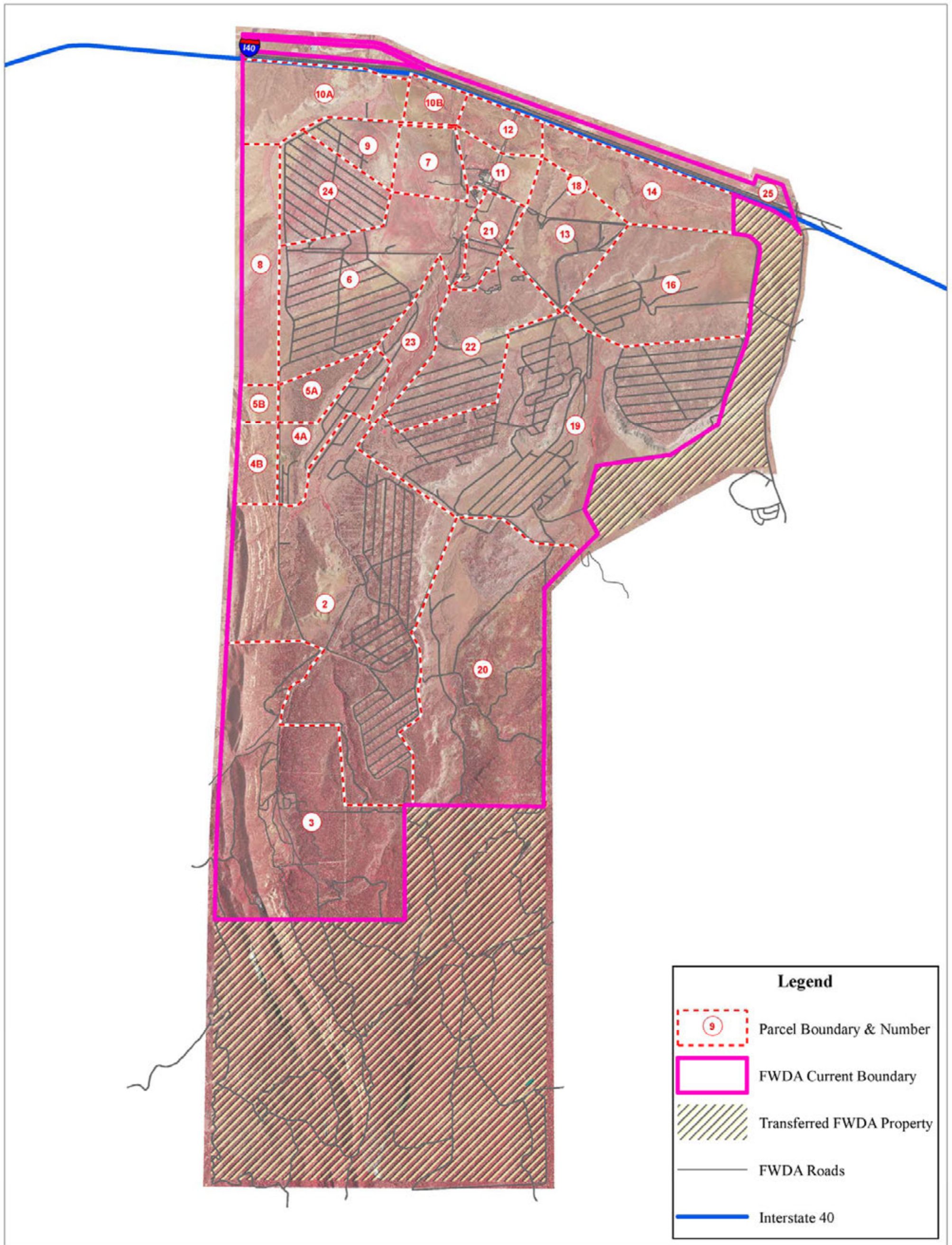
FWDA GENERAL LOCATION MAP

INSTALLATION SPILL  
CONTINGENCY PLAN

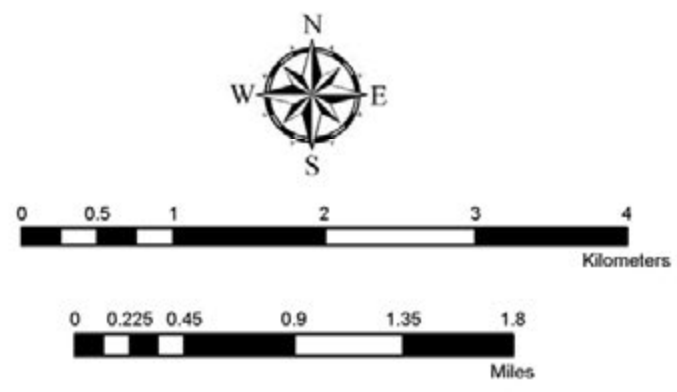
FORT WINGATE DEPOT ACTIVITY,  
MCKINLEY COUNTY, NEW MEXICO



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**Notes**  
 FWDA = Fort Wingate Depot Activity

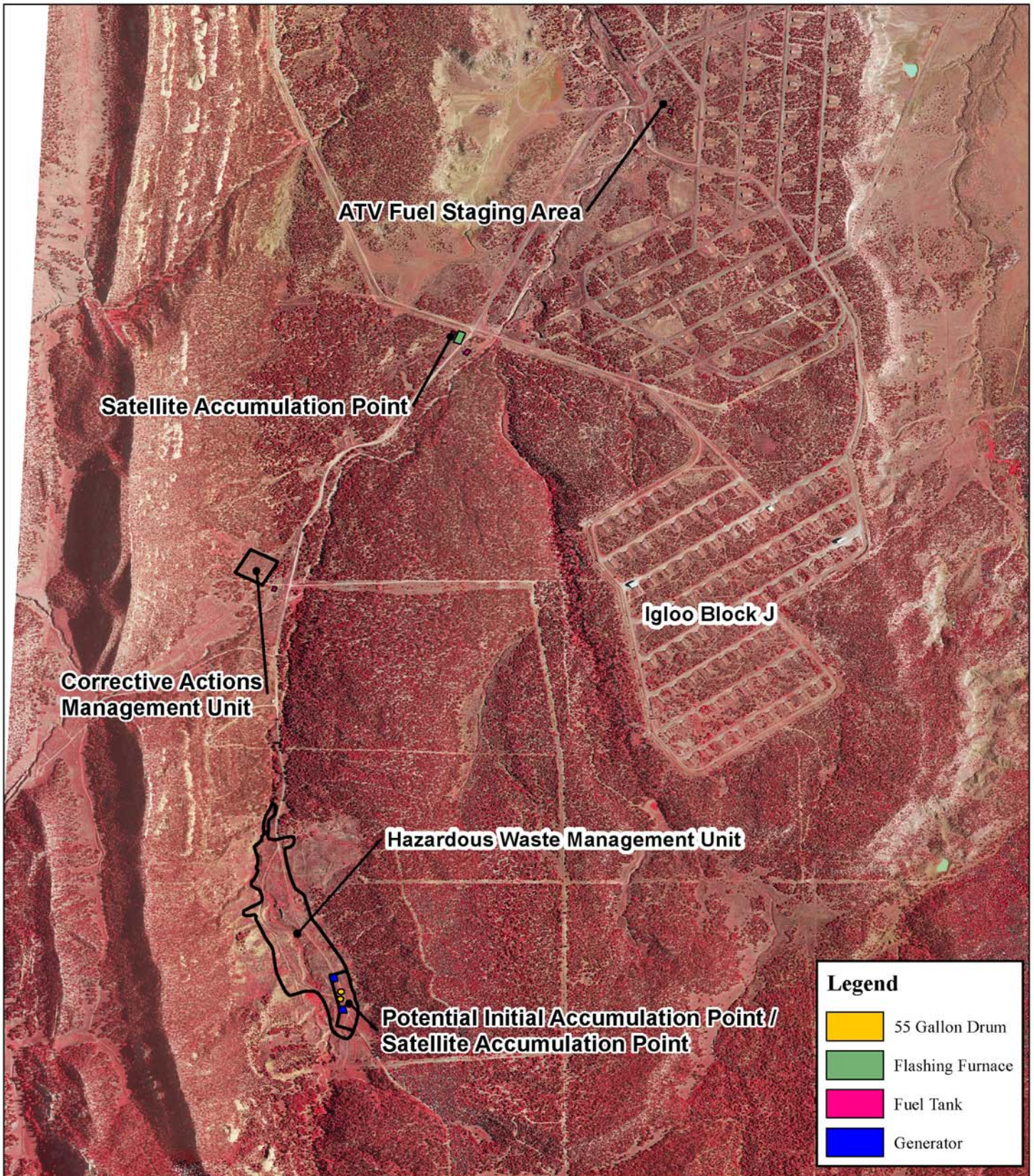


**FIGURE 2**  
 FWDA PARCEL LOCATIONS  
 INSTALLATION SPILL  
 CONTINGENCY PLAN  
 FORT WINGATE DEPOT ACTIVITY,  
 MCKINLEY COUNTY, NEW MEXICO



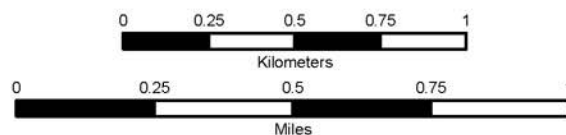
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**Notes**

IAP = Initial Accumulation Point  
 ATV = All Terrain Vehicle



**FIGURE 3**

IAP LOCATIONS MAP

INSTALLATION SPILL  
 CONTINGENCY PLAN

FORT WINGATE DEPOT ACTIVITY,  
 MCKINLEY COUNTY, NEW MEXICO

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**LEGEND**

-  Interstate
-  US Highway
-  State Road

**Notes:**

FWDA = Fort Wingate Depot Activity  
 US = United States

Source: (c) 2013 Google Earth,  
 Image Landsat  
 (c) 2013 INEGI  
 ESRI ArcMap

NOT TO SCALE



Date: 03/02/2015



**FIGURE 4**

**HOSPITAL ROUTE MAP  
 FROM FWDA TO REBOOTH  
 MCKINLEY CHRISTIAN HOSPITAL**

**INSTALLATION SPILL  
 CONTINGENCY PLAN**

**FORT WINGATE DEPOT ACTIVITY  
 FORT WINGATE, NEW MEXICO**

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**LEGEND**

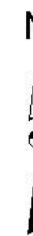
-  Interstate
-  US Highway
-  State Road
-  Surface Road

**Notes:**

FWD A = Fort Wingate Depot Activity  
 US = United States

Source: (c) 2013 Google Earth,  
 Image Landsat  
 (c) 2013 INEGI  
 ESRI ArcMap

NOT TO SCALE



Date: 03/02/2015



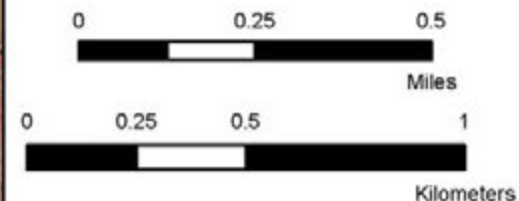
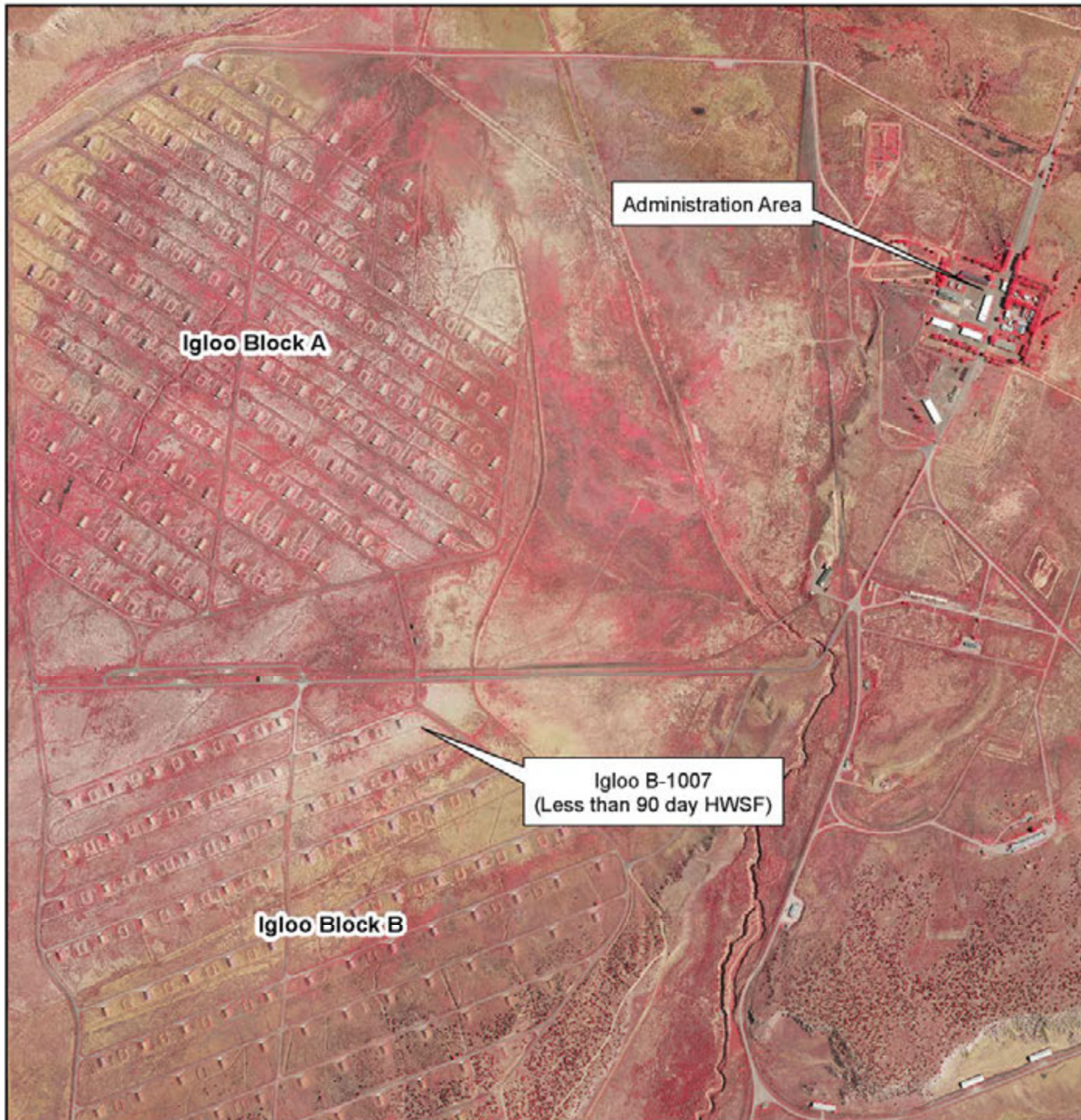
**FIGURE 5**

HOSPITAL ROUTE MAP  
 FROM FWD A TO UNIVERSITY OF  
 NEW MEXICO HOSPITAL

INSTALLATION SPILL  
 CONTINGENCY PLAN

FORT WINGATE DEPOT ACTIVITY  
 FORT WINGATE, NEW MEXICO

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**Notes**  
HWSF = Hazardous Waste Storage Facility

Updated:  
4/23/2015 3:08:03 PM



*Sundance*  
Consulting Inc.

**FIGURE 6**

STORAGE IGLOO B-1007  
LOCATION MAP

INSTALLATION SPILL  
CONTINGENCY PLAN

FORT WINGATE DEPOT ACTIVITY,  
MCKINLEY COUNTY, NEW MEXICO

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**ATTACHMENT 1:**  
**CERTIFICATION OF SUBSTANTIAL HARM DETERMINATION FORM**

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**CERTIFICATION OF THE APPLICABILITY OF THE SUBSTANTIAL HARM  
CRITERIA CHECKLIST**

Facility: Fort Wingate Depot Activity  
McKinley County, New Mexico

1. Does the Facility transfer oil over water to or from vessels and does the facility have a total oil storage capacity of greater than or equal to 42,000 gallons?

Yes \_\_\_\_\_ No  X

2. Does the facility have a total storage capacity greater than or equal to 1 million gallons and does the facility lack secondary containment that is sufficiently large to contain the capacity of the largest aboveground oil storage tank plus sufficient freeboard to allow for precipitation within any aboveground oil storage tank area?

Yes \_\_\_\_\_ No  X

3. Does the facility have a total storage capacity greater than or equal to 1 million gallons and is the facility located at a distance (as calculated using the appropriate formula in Attachment C-III, Appendix C, 40 CFR 112 or a comparable formula) such that a discharge from the facility could cause injury to fish and wildlife and sensitive environments? For further discussion of fish and wildlife and sensitive environments, see Appendices I, II, and III to Department of Commerce/National Oceanic and Atmospheric Administration's "Guidance for Facility and Vessel Response Environments" (Section 10, Appendix E, 40 CFR 112 for availability) and the applicable Area Contingency Plan.

Yes \_\_\_\_\_ No  X

4. Does the Facility have a total oil storage capacity greater than or equal to 1 million gallons and is the facility located at a distance (as calculated using the appropriate formula in Attachment C-III, Appendix C, 40 CFR 112 or a comparable formula) such that a discharge from the facility would shut down a public drinking water intake?

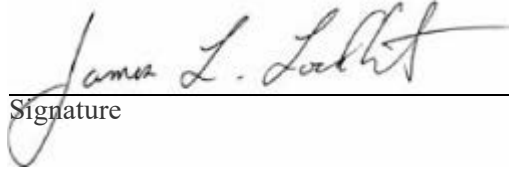
Yes \_\_\_\_\_ No  X

5. Does the Facility have a total oil storage capacity greater than or equal to 1 million gallons and has the facility experienced a reportable oil spill in an amount greater than or equal to 10,000 gallons within the last 5 years?

Yes \_\_\_\_\_ No  X

**CERTIFICATION**

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document, and that based on my inquiry of those individuals responsible for obtaining this information, I believe that the submitted information is true, accurate, and complete.



Signature

Vice President of Operations

Title

James L. Lockhart, P.E.

Name (please print or type)

18 April 2017

Date

**ATTACHMENT 2:  
CONTACT INFORMATION**

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**EMERGENCY CONTACT LIST  
FORT WINGATE DEPOT ACTIVITY  
MCKINLEY COUNTY, NEW MEXICO**

**Immediate Telephone Notifications of Contingency Plan Implementations**

All Emergencies	911
New Mexico Hazardous Waste Bureau (Emergency)	505-827-9329
New Mexico Hazardous Waste Bureau (Non-Emergency)	505-476-6000
New Mexico Environment Department General Phone (Non-Emergency)	800-219-6157
White Sands Missile Range Environmental Office	575-678-2225
National Response Center	800-424-8802

**Local Emergency Response Organizations**

Metro Dispatch City, County, Fire	505-722-2002
McKinley County Fire Department,	505-863-3839
McKinley County Sheriff's Department	505-722-7205
New Mexico State Police	505-863-9353
Gallup Police	505-863-9365
Fort Wingate Fire Department	505-488-5261
Rehoboth McKinley Christian Hospital – Gallup, New Mexico	505-863-7000

**FWDA and USACE Contacts**

Name	Organization	FWDA Role	Phone
Richard Cruz	BRACD	Installation Primary On Scene Coordinator/Caretaker	Office:505-905-2504 Cell: 505-862-2416, Home: 505-488-2244
Ricky Albrecht	BRACD	Installation Alternate On Scene Coordinator Caretaker	Office: 505-905-2504 Cell: 575-520-2194
Mark Patterson	BRACD	FWDA BRAC Environmental Coordinator (BEC)	Office: 330-358-7312 Cell: 505-721-9770
Steve Smith	USACE SWF	FWDA Program Manager	Office: 817-886-1879 Cell: 817-507-9950
OESS on duty	USACE	FWDA Onsite Ordnance & Explosives Safety Expert	505-905-2501
Martin Eastridge	Missile Defense Agency	Fort Wingate Launch Complex (FWDA Tenant)	Office: 575-679-7427 Cell: 575-649-0352 Home: 505-733-2173

**Regulatory Agencies**

Chuck Hendricksen	USEPA Region 6	Regulatory Review	214-665-2196
John Kieling	New Mexico Environment Department	RCRA Permits Management Program Chief	505-476-6016
Dave Cobrain	New Mexico Environment Department	Hazardous Waste Bureau	505-476-6055

**Disposal Facility**

Operator	Safety-Kleen/Clean Harbors	Disposal Services	505-884-2277
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**ATTACHMENT 3:  
SPILL INCIDENT FORM**

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**SPILL INCIDENT FORM**

Facility Address and Phone: \_\_\_\_\_

Date, time, and duration of the release: \_\_\_\_\_

Source//location of the release: \_\_\_\_\_

Person or persons causing and responsible for the release: \_\_\_\_\_

Type and amount of oil released: \_\_\_\_\_

Cause of the release: \_\_\_\_\_

Environmental damage caused by the release: \_\_\_\_\_

Actions taken to respond, contain, and clean-up the release: \_\_\_\_\_

Actions being taken to prevent a re-occurrence of the release:

Describe known or anticipated acute or chronic health risks associated with the release:

Describe any injuries or need for evacuation: \_\_\_\_\_

Is the release of this material a “reportable” quantity by statutory requirements?

\_\_\_\_\_ Yes \_\_\_\_\_ No

Determined by \_\_\_\_\_ Date: \_\_\_\_\_

Notifications

	Contact Person	Date	Time
1	_____	_____	_____
2	_____	_____	_____
3	_____	_____	_____
4	Government Agencies		
A	Local	_____	_____
B	State	_____	_____
C	Federal	_____	_____

*Comments provided on the back of this form*

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**ATTACHMENT 4:**  
**SPILL RESPONSE PROCEDURES**

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## **SPILL RESPONSE PROCEDURES**

### **Initial Actions**

1. Determine if any personnel have been injured. If so, seek medical attention for injured personnel.
2. Put on the appropriate personal protective equipment, for oil spills including:
  - Gloves
  - Eye goggles
  - Apron (if warranted)

### **If the Spill is Small (approximately 5 gallons or less):**

1. Apply absorbent around and across the spill.
2. Remove the absorbent and the spill with broom and dustpan or shovel.
3. Place the spilled material and absorbent into an approved container.
4. Contact the individuals listed on the Primary Contacts List (see below).

### **If the Spill is Large (5 gallons or larger)**

1. Apply absorbent around the released material.
2. Contact the following individuals from the Primary Contact List:
  - FWDA Caretaker
  - Any emergency contacts necessary such as fire and police
  - Emergency Spill Response Contractor
  - Local and State Agencies
  - USEPA Region 6 Office (if spill qualifies according to Section 1 of this Plan)

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**ATTACHMENT 5:  
PHOTOGRAPHIC LOG**

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**Photograph 1:** Igloo B-1007 (Less-Than-90-Day holding facility)  
facing southeast.  
**Date of Photograph:** 13 February 2015

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**Photograph 2:** Interior of Igloo B-1007 (Less-Than-90-Day holding facility) showing secondary bermed containment and waterproof sealant.

**Date of Photograph:** 13 February 2015

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**Photograph 3:** Interior of Igloo B-1007 (west wall) showing secondary bermed containment and waterproof sealant.

**Date of Photograph:** 13 February 2015

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**Photograph 4:** Interior of Igloo B-1007 (Less-Than-90-Day holding facility) showing access ramp to secondary containment area.

**Date of Photograph:** 13 February 2015

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**Photograph 5:** Interior of Igloo B-1007 (east wall) showing secondary bermed containment and waterproof sealant.

**Date of Photograph:** 13 February 2015

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**Photograph 6:** Interior of Igloo B-1007, showing emergency eyewash station and drum of spill-absorbent powder.

**Date of Photograph:** 13 February 2015

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**Photograph 7:**

Interior of Igloo B-1007, showing drum of spill-absorbent powder and empty poly-overpack drum.

**Date of Photograph:**

13 February 2015

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**Photograph 8:** Interior of Igloo B-1007, showing Right-to-Know Center.  
**Date of Photograph:** 13 February 2015

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**Photograph 9:** Interior of Igloo B-1007, showing emergency spill supplies.  
**Date of Photograph:** 13 February 2015

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**Photograph 10:** Interior of Igloo B-1007, showing empty-drum-staging area.  
**Date of Photograph:** 13 February 2015

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**Photograph 11:**

Interior of Building 6 (facing south through the north window), showing portable fuel cans and drum dolly.

**Date of Photograph:**

13 February 2015

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**Photograph 12:**

Interior of Building 6 (facing northwest through the east window), showing 55-gallon diesel fuel drums.

**Date of Photograph:**

13 February 2015

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**Photograph 13:**

Interior of Building 6 (facing southwest through the east window), showing 55-gallon diesel fuel drums and portable fuel cans.

**Date of Photograph:**

13 February 2015

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**ATTACHMENT 6:**  
**STANDARD OPERATING PROCEDURE AND MONTHLY  
PREVENTATIVE MAINTENANCE INSPECTION REPORT FORM**

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## **MONTHLY INSPECTION STANDARD OPERATING PROCEDURE**

### **PURPOSE**

The purpose of the Standard Operating Procedure (SOP) for Routine Inspection of is to ensure that the in-line fuel tanks of Generators 1 through 3 are properly inspected in a timely and consistent manner. All FWDA contractors must follow this procedure or an equivalent inspection procedure to perform monthly inspections of the tanks.

### **RESPONSIBILITY**

It is the responsibility of ALL FWDA and Contractor-management personnel to publish and distribute this SOP as well as insuring the proper training of personnel. It is the responsibility of FWDA Caretaker and Contractor Spill Prevention Control and Countermeasure (SPCC) personnel to ensure that this SOP is adhered to at all times.

### **INSPECTION PROCEDURES**

The following procedures will be used when completing the monthly in-line fuel tank inspections:

Visually inspect all sides of the tank exterior and check for the following:

- Signs of leaking, contamination, or visible product.
- Rust, corrosion, pin holes, or other signs of deterioration.
- Integrity of welds.
- Signs of damage such as dents.
- Drainage valves on secondary containment are closed, if applicable.
- Secondary containment does not have any cracks or damage.
- Structural soundness of any tank supports or foundation.
- Visually test level gauge for function, if applicable (i.e., observe during filling operation).
- Spill kits are available.
- Each inspection will be recorded on the Monthly Preventative Maintenance Inspection Report included in this appendix. The inspection report will be kept on file for three (3) years from the date of the inspection.

## MONTHLY PREVENTATIVE MAINTENANCE INSPECTION REPORT

NOTE: This report must be completed each month by FWDA Caretaker or designated contractor SPCC personnel and copies must be filed and maintained in the contractor field office and at the Administrative Record at FWDA.

Person performing inspection: \_\_\_\_\_

Date of inspection: \_\_\_\_\_

Instructions: After inspection of each item, signify in each column by a check mark if the inspected area is in good condition and functioning. If not, complete the "Inspection Results" section below and specifically note any areas where potential spill or contamination risks are observed.

### STORAGE TANKS

<b>Tank #</b>	<b>Tank Contents</b>	<b>Visual tank inspection (i.e., evidence of leaks, corrosion or structural weakness?)</b>	<b>Tank foundation and Support</b>	<b>Spill containment area</b>	<b>Tank level gauge (is it functioning properly?)</b>
Generator #1 (HWMU – 40 kW)	Diesel Fuel			Yes (berm)	
Generator #2 (HWMU – 608 kW)	Diesel Fuel			Yes (berm)	
Generator #3 (HWMU – 400 kW)	Diesel Fuel			Yes (berm)	
Hydraulic Fluid	Hydraulic Oil			Yes (Catch Basin)	
Waste Oil	Waste Oil			Yes (Catch Basin)	
Diesel Fuel- Contractor Fueling Area- CAMU	Diesel Fuel			Yes- Berm with underlying heavy-duty impervious plastic sheeting	
Diesel Fuel- Contractor Flashing Unit Generator- CAMU	Diesel Fuel			Yes- Portable containment box	
Diesel Fuel	Diesel Fuel			Yes- Berm with underlying heavy-duty impervious plastic sheeting	
Building 006	Diesel Fuel			Yes (impervious floor)	



Building 1007	Various			Yes (berm and waterproof sealant on floor and walls).	
---------------	---------	--	--	---	--

**INSPECTION RESULTS**

Problem Area	Nature of Problem	Recommendation for Correction	Corrective Action Taken (should be initialed and dated by inspector listed above upon completion of work)

**PIPING AND TRANSFER MATERIAL**

Description	Visual Inspection (i.e. evidence of leaks, corrosion or structural weakness)	Piping Supports (i.e. evidence of corrosion or structural weakness)	Valves and flange connections
Transfer lines and pumps for Generator Tank #1 to generator			
Transfer lines and pumps for Generator Tank #2 to generator			
Transfer lines and pumps for Generator Tank #3 to generator			

**INSPECTION RESULTS**

Problem Area	Nature of Problem	Recommendation for Correction	Corrective Action Taken (should be initialed and dated by inspector listed above upon completion of work)

**SPILL KITS**

Description	Location	Contents	Comments
Spill Kit #1	Generator #1–HWMU		
Spill Kit #2	Generator #2–HWMU		
Spill Kit #3	Generator #3–HWMU		
Spill Kit #4	Diesel Fuel Tank–Contractor Fueling–CAMU		
Spill Kit #5	Diesel Fuel Tank–Contractor Flashing Unit Generator–CAMU		

Description	Location	Contents	Comments
Spill Kit #6	Building 006		
Spill Kit #7	Building B-1007		

INSPECTION RESULTS

Problem Area	Nature of Problem	Recommendation for Correction	Corrective Action Taken (should be initialed and dated by inspector listed above upon completion of work)

**\*\*NOTE: This Report must be maintained for three (3) years from the date of inspection**

**Keep on file until:** \_\_\_\_\_

**Inspector's Initials:** \_\_\_\_\_ **Date:** \_\_\_\_\_

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**ATTACHMENT 7:  
TRAINING ATTENDANCE FORM**

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## SPILL CONTROL TRAINING

Instructions: This training session will be given to site workers on an annual basis. The site workers must initial each blank to signify receipt of training in applicable area.

### 1. Spill Prevention

- \_\_\_\_\_ Material handling procedures
- \_\_\_\_\_ Preventative maintenance practices
- \_\_\_\_\_ Housekeeping practices

### 2. Recognizing and Identifying a Spill

- \_\_\_\_\_ Indications of spills (odors, fumes, vegetation damage)
- \_\_\_\_\_ Identifying spilled materials (e.g. fuel oil, hydraulic fluid, waste oil)
- \_\_\_\_\_ Safety procedures when exposed to spilled materials (see also Material Safety Data Sheet [MSDS])

### 3. Containment of Spilled Materials in Plant Drainage System

- \_\_\_\_\_ Safety issues in containing spills
- \_\_\_\_\_ Manner and technique of spill containment

### 4. Stopping or Diverting Flow of Spilled Materials from Spill Source

- \_\_\_\_\_ Location and operation of shutoff and drain valves on tanks and other containment devices
- \_\_\_\_\_ Location and operation of breaker switches for power source
- \_\_\_\_\_ Location of spill kits
  - Spill Kit #1- Generator #1- HWMU
  - Spill Kit #2- Generator #2- HWMU
  - Spill Kit #3- Generator #3- HWMU
  - Spill Kit 4 – Contractor Fueling Station- CAMU
  - Spill Kit 5 – Contractor Flashing Unit Generator- CAMU
  - Spill Kit #6- Building 006
  - Spill Kit #7- Building B-1007

**5. Cleanup and Neutralization**

\_\_\_\_\_ Safety concerns in cleanup and neutralization

\_\_\_\_\_ Use of absorbent materials (e.g. for petroleum spills)

**6. Employee responsibilities in the event of a spill. As soon as an employee has reason to believe that a spill has occurred, the employee should:**

- a) Determine if there is the possibility of a health or safety threat. The employee should know the location of the MSDS for commonly used materials so that these may be referred to in case there is a question as to the potential risks posed by the material. If there is, then the first thing which must be done is to evacuate the area.
- b) Notify supervisor of the following
  - (1) location of possible spill
  - (2) identity of spilled material
  - (3) estimated quantity (if possible)
- c) Stop or divert flow of spilled materials (as safety concerns permit)
- d) Institute measures to contain the spilled material in the area of the spill (as safety concerns permit)
- e) Institute cleanup or neutralization procedures as directed by the Plant Manager or his designated representative.
- f) Provide information as requested for completion of Spill Report

I certify that I have received training in the above noted areas on the date written below. I understand these procedures and agree to abide by them.

**Employee Name**

\_\_\_\_\_

**Employee Signature**

\_\_\_\_\_

**Employee Organization**

\_\_\_\_\_

**Date:**

\_\_\_\_\_



**ATTACHMENT 8:**  
**FACILITY EMERGENCY RESPONSE CONTACTS**

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# **FORT WINGATE DEPOT ACTIVITY EMERGENCY RESPONSE PHONE NUMBERS**

## **1. NAME/ADDRESS/TELEPHONE OF OWNER/OPERATOR CONTRACTS:**

Caretaker Staff – Fort Wingate Depot Activity (FWDA)  
P.O. Box 268, Fort Wingate, New Mexico 87316  
Historic Route 66, Trailer 3 (7 Miles East of Gallup)  
Office: (505) 905-2504

U.S. Army Garrison, White Sands Missile Range (WSMR)  
ATTN: IMWE-WSM-PL  
Building 1417,  
White Sands Missile Range, New Mexico 88002  
Office: (575) 687-8999

**BRAC-D PM – Ian Thomas**  
BRACD  
Taylor Building, Room 5104B  
2530 Crystal Drive  
Arlington, Virginia 22202  
Office: (703) 545-2536 Mobile: (571) 338-5942

**Life, Health, or Safety Actions/Incidents:**  
**Colonel Dave Brown, Garrison Commander (575) 678-2220**

## **2. LOCAL EMERGENCY RESPONSE ORGANIZATIONS:**

**ALL EMERGENCIES DIAL 911**

<b>McKinley County Metro Dispatch (City, County, Fire)</b>	<b>(505) 722-2002</b>
<b>McKinley County Fire &amp; Rescue</b>	<b>(505) 863-3839</b>
<b>McKinley County Sheriff's Department</b>	<b>(505) 722-7205</b>
<b>New Mexico State Police</b>	<b>(505) 863-9353</b>
<b>Fort Wingate Fire Department</b>	<b>(505) 488-5261</b>
<b>City of Gallup Police Department</b>	<b>(505) 863-9365</b>
<b>Rehoboth McKinley Christian Hospital</b>	<b>(505) 863-7000</b>

## **3. INSTALLATION ON-SCENE/EMERGENCY COORDINATORS**

Primary: Richard Cruz- Office: (505) 905-2504  
Mobile: (505) 862-2416 Personal Cell: (505) 728-8088  
613 Julie Dr., Gallup NM, 87301

Alternate: Ricky Albrecht- Office: (505) 905-2504 Mobile: (575) 520-2194

# **FORT WINGATE DEPOT ACTIVITY EMERGENCY RESPONSE PHONE NUMBERS (continued)**

## **4. ADVISORY/SUPPORT GROUP**

Mark Patterson, FWDA BEC- Office: (330) 358-7312 Mobile: (505) 721-9770  
Steve Smith, USACE PM- Office: (817) 886-1879 Mobile: (817) 507-9950  
WSMR Department of Public Works- (575) 678-1131  
WSMR Enviro- Office: (575) 678- 2225  
WSMR Human Resources- (575) 678-4196  
WSMR Safety Office- (575) 678- 2305/5746  
WSMR Public Affairs- (575) 678-1134  
WSMR Contracting Office- (575) 678- 7307  
WSMR DPW Operations/Scheduling- (575) 679-1315  
WSMR Maintenance- (575) 679-1304  
WSMR Budget & Accounting- (575) 687-0699

## **5. EMERGENCY NOTIFICATIONS OF OFF-SITE IMPACTS**

NM Environmental Department Dispatch (505) 827-9329  
McKinley County Metro Dispatch (505) 722-2002  
National Response Center (800) 424-8802

## **6. IMMEDIATE TELEPHONE NOTIFICATIONS OF CONTINGENCY PLAN IMPLEMENTATIONS**

NM Hazardous Waste Bureau (Emergency) (505) 827-9329  
NM Hazardous Waste Bureau (Non-Emergency) (505) 476-6000  
NMED General Phone (Non-Emergency) (800) 219-6157 or (505) 827-2855  
National Response Center (800) 424-8802  
WSMR Environmental Office (575) 678-2225

## **7. FORT WINGATE LAUNCH COMPLEX (FWDA TENANT)**

Primary POC: Martin Eastridge  
Office: (575) 679-7427  
Home: (505) 733-2173  
Cell: (575) 649-0352

**ATTACHMENT 9:  
EMERGENCY EQUIPMENT LOCATIONS**

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**Inspection/Inventory**  
**FWDA Equipment for Emergency Response**

<b>Description</b>	<b>Quantity</b>	<b>Location</b>	<b>Function</b>
Rake, long handle	1	Building 6	Clean up/Spill response
Broom		Building 6	Clean up/Spill response
Shovel		Building 6	Clean up/Spill response
Shovel, square point		Building 6	Clean up/Spill response
Radio	9	Trailer #1	Communications
Forklift		Contractor Facility	Clean up/Spill response
Pickup truck	2	Contractor Facility	Clean up/Spill response
Log chains (20 feet long)		Contractor Facility	Clean up/Spill response
Drum dolly	1	Building 6	Clean up/Spill response
Fire extinguisher		Various	Fire response

**Inspected and Inventoried by:** \_\_\_\_\_

**Date:** \_\_\_\_\_

**Deficiencies:**

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

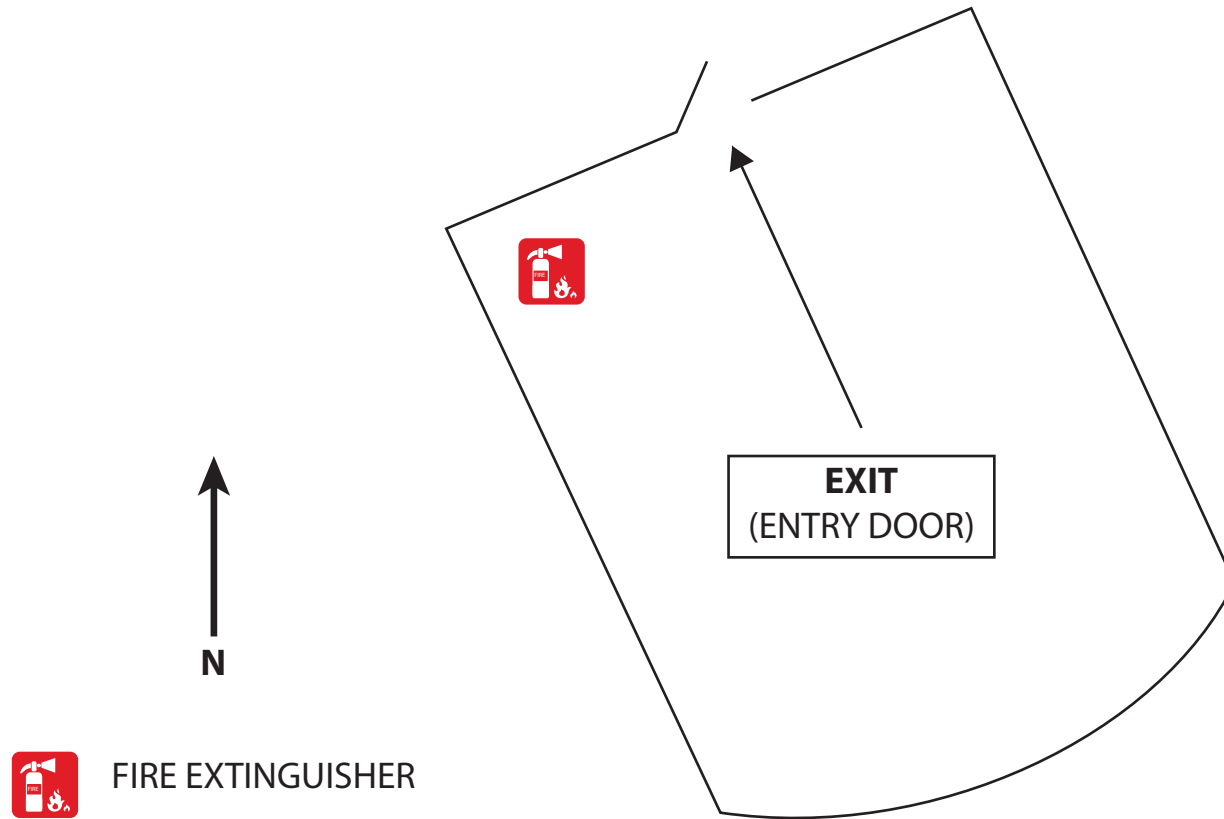
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**ATTACHMENT 10:  
EVACUATION PLAN**

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**EVACUATION PLAN**  
Less-than-90-Day Waste Accumulation Area  
BUILDING B-1007



IN CASE OF FIRE OR EMERGENCY, USE THE NEAREST EXIT IN AN ORDERLY FASHION.  
MOVE AWAY FROM THE BUILDING AT LEAST 500 FEET.  
DO NOT RETURN UNTIL THE FIRE MARSHAL OR OTHER AUTHORIZED PERSON DECLARES THE BUILDING SAFE.

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**ATTACHMENT 11:  
AGREEMENT WITH HOSPITALS, FIRE, AND EMERGENCY  
RESPONSE TEAMS**

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REPLY TO  
ATTENTION OF

**DEPARTMENT OF THE ARMY**  
**U.S. ARMY WHITE SANDS MISSILE RANGE**  
**100 Headquarters Avenue**  
**WHITE SANDS MISSILE RANGE, NEW MEXICO 88002-5000**

08-MAR-2083

**RECIPROCAL FIRE PROTECTION AGREEMENT**  
**BETWEEN**  
**GARRISON COMMANDER, U.S. ARMY, WHITE SANDS MISSILE RANGE,**  
**NEW MEXICO**  
**AND**  
**MCKINLEY COUNTY, NEW MEXICO**

This Reciprocal Fire and Emergency Services Protection Agreement is entered into this 18<sup>th</sup> day of March 2008, by and between the Secretary of the Army (hereinafter "the Army"), acting pursuant to the authority of 42 U.S.C. 1856(A), and the government of McKinley County, New Mexico. Hereinafter the Secretary of the Army, United States of America, who will be represented by the Garrison Commander of White Sands Missile Range (WSMR), will be referred to as the Government.

WITNESS THAT:

WHEREAS:

The Army owns the Fort Wingate Depot Activity, hereinafter referred to as Fort Wingate, a facility of the Department of the Army.

The McKinley County Government maintains a Fire Department, which includes volunteer personnel, fire trucks, and fire fighting equipment.

The Army does not maintain a Fire Department at Fort Wingate. The Fort Wingate caretakers are the designated facility Fire Wardens.

It is to the best interest of the parties here to cooperate in fire fighting and other emergencies that may occur within the Fort Wingate.

NOW THEREFORE, the parties hereto do hereby agree to render mutual assistance, one to the other, on the terms, conditions, and provisions hereinafter set forth:

(1) McKinley County will, at the request of the Garrison Commander WSMR or his properly authorized designee, in the time of emergency or necessity, furnish aid in the nature of apparatus, equipment, and personnel to combat fires or assist in time of disaster at Fort Wingate.

(2) The Army, acting through the caretaker or Garrison Commander WSMR will, at the request of the McKinley County Fire Chief or his properly authorized designee, in the time of

emergency or necessity, furnish aid to McKinley County in the nature of equipment, and personnel to combat fires or assist in time of disaster in the proximity of Fort Wingate.

(3) When the McKinley County or Gallup City Fire Department or parts thereof are engaged in fire fighting at Fort Wingate, they shall be subject to the authority and direction of the Caretaker of Fort Wingate and the Garrison Commander WSMR thereof. When the combined forces or parts thereof are engaged in fire fighting in McKinley County, they shall be under the authority and direction of the Fire Chief of McKinley County departments.

(4) Army personnel, acting pursuant to this agreement, shall be considered to be acting pursuant to lawful orders to the Garrison Commander WSMR and Caretaker of Fort Wingate, and therefore, acting within the scope of their employment and not as employees of McKinley County.

(5) It is understood and agreed that McKinley County will be under no obligation to furnish aid to Fort Wingate if, under the circumstances, furnishing of such aid will endanger or jeopardize the fire protection of the County. It is likewise understood and agreed that Fort Wingate shall be under no obligation to furnish aid to the County, if the furnishing of such aid, under the circumstances, will have an unacceptable impact on operations or fire protection at Fort Wingate. The County Commissioners or Fire Chief of the County departments or their properly authorized designee will be the sole judge as to when conditions permit assistance and the extent of such assistance to Fort Wingate. The Garrison Commander WSMR or Caretaker of Fort Wingate shall be the sole judge as to when conditions permit assistance and the extent of such assistance to the County by the Government.

(6) It is hereby agreed that cooperating fire departments will become familiar with the special fire fighting problems common to their territory.

(7) Under no circumstances will mutual aid fire fighters be expected to or permitted to enter the area or attach fires involving high explosives.

(8) In the event the combined departments or parts thereof are engaged in fighting a fire, a department lending assistance may, in order to attend any alarm at its regular station, withdraw on notice to the Fire Chief/personnel in charge.

(9) It is expressly hereby mutually agreed between the parties hereto that any claim against either party by the other party for compensation for any loss, damage, personal injury or death occurring in consequence of the performance of this agreement is hereby waived, except those claims authorized under 15 U.S.C. section 2210.

(10) This Agreement may be terminated at any time by either party, provided that such termination shall not be effective until 30 calendar days after the terminating party gives written notice of its intention to terminate and such notice is received by the other party. Until such termination is effected, the terms, provisions, and conditions of this agreement shall remain in full force and effect.



FOR MCKINLEY COUNTY, NEW MEXICO: FOR THE SECRETARY OF THE ARMY:

Tom Trujillo  
TOM TRUJILLO  
County Manager

DATE: 03-18-2008

Gary D. Giebel  
GARY D. GIEBEL  
Colonel, U.S. Army  
Garrison Commander

DATE: 3 Apr 08

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**DEPARTMENT OF THE ARMY**  
U.S. ARMY GARRISON WHITE SANDS MISSILE RANGE  
100 Headquarters Avenue  
WHITE SANDS MISSILE RANGE, NEW MEXICO 88002-5000

**MEMORANDUM OF UNDERSTANDING  
BETWEEN  
GARRISON COMMANDER, US ARMY WHITE SANDS MISSILE RANGE (WSMR),  
NEW MEXICO  
AND  
NEW MEXICO DEPARTMENT OF PUBLIC SAFETY-STATE POLICE DIVISION,  
NEW MEXICO  
FOR**

Law Enforcement Support for felonies, misdemeanors, major disruptions, natural disasters, special threats/circumstance and traffic accidents on Fort Wingate Depot Activity (FWDA) and Launch Complex (FWLC). Any Special Response Team (SRT), Explosive Ordnance Disposal Team (EOD), Special Operation Working Dogs, if available, when military support is not available, and Intelligence Sharing.

This is a Memorandum of Understanding (MOU) between the White Sands Missile Range Garrison Commander, and the New Mexico Department of Public Safety-State Police Division.

**1. AUTHORITIES:**

- 1.1. Army Regulation (AR) 525-13, Antiterrorism, dated 11 September 2008.
- 1.2. Army Regulation 190-14, Carrying of Firearms and Use of Force for Law Enforcement and Security Duties, dated 12 March 1993.
- 1.3. Army Regulation 190-58, Personal Security, dated 22 March 1989.
- 1.4. Army Regulation 190-56, Army Civilian Police and Security Guard Program, dated 15 March 2013.

**2. PURPOSE:** This agreement is for the transfer to New Mexico Department of Public Safety-State Police Division (NMDPS-SPD) of various aspects of an Army law enforcement and security mission, to include barricaded subjects, hostage situations, special threat situations, sniper incidents, high threat raids, and warrant apprehension of dangerous individuals on FWDA and FWLC. This agreement compensates for the limited amount of military police/civilian police resources from White Sands Missile Range (WSMR), NM. Also, it provides for assistance in the capture/recovery of unauthorized person(s) and special equipment/material illegally removed from the FWDA/FWLC facilities, New Mexico.

**3. UNDERSTANDINGS OF THE PARTIES:**

3.1. The WSMR will-

3.1.1. Dispatch DA police/guard and Military Police personnel and equipment for initial response to any special threat situation as distance and time lines allow for potential follow up coordination to the NMDPS-SPD, FBI, or the US Army Criminal Investigations Division (CID).

3.1.2. Provide intelligence and logistical support on a limited basis, as determined by the Garrison Commander or his/her designee.

3.1.3. Provide site briefings and installation vulnerability assessments, as determined by the Garrison Commander or his/her designee.

3.1.4. Provide operational support as requested by the MCSO or NMDPS-SPD (as applicable in each document) for the response to activities on FWDA/FWLC.

3.1.5. Provide criminal intelligence and law enforcement information obtained by the Army to the New Mexico Department of Public Safety State Police Division to the extent authorized by applicable law and Service regulations.

3.1.6. WSMR Public Affairs Office, will be responsible for the release of any information regarding an incident that occurs on WSMR, FWAD, and FWLC.

3.2. The New Mexico Department of Public Safety-State Police Division will-

3.2.1. Respond to requests for support.

3.2.2. Provide State of New Mexico or federally certified Law Enforcement personnel upon request from WSMR.

3.2.3. Provide all equipment, supplies, and transportation necessary for the NMDPS-SPD to accomplish its mission at WSMR.

3.2.4. Respond to WSMR requests for assistance in a reasonable amount of time as determined by the circumstances and response required. Events where NMDPS-SPD is affected by similar events and an assessment of requested resources is determined the response will be based upon time, distance and staffing.

3.2.5. Coordinate with the Garrison Commander, WSMR, IC, or the authorized Government Representative upon arrival at FWDA/FWLC. WSMR shall retain control over decisions regarding plans where the use of force/deadly force by the Department of Army (DA) police/guard, Military Police and NMDPS-SPD officers prior to any action taking place. Once the plan is approved and the teams are executing the actions and physically committed to the action use of force decisions transfer to the operational teams.

3.2.5.1. Upon notification of unauthorized removal of Army or Army contractor property from FWDA/FWLC, utilize all available support (personnel and equipment) to assist in the capture of responsible personnel and recovery of the items.

3.2.5.2. Hold the item and the persons responsible for its removal until transferred to competent civilian/military authority.

3.2.5.3. Provide emergency notification for major events that take place in any of the Fort Wingate Army property, and all reports involving an incident to the WSMR DES as soon as available

3.2.5.4. Provide information, to include intelligence analyses, concerning criminal activities affecting the security of Army activities and personnel to WSMR DES. Such information includes organized crime, terrorism, narcotics trafficking, and other criminal activity involving Army personnel, missions, and property. The Agency will also cooperate with WSMR DES or other Army investigative organizations in matters arising from Army activities, to include sharing investigative information and participating in joint investigations, to the extent authorized by law.

4. PERSONNEL: Each Party is responsible for all costs of its personnel, including pay and benefits, support, and travel. Each Party is responsible for supervision and management of its personnel.

#### 5. GENERAL PROVISIONS:

5.1. POINTS OF CONTACT: The following points of contact (POC) will be used by the Parties to communicate in the implementation of this MOU. Each Party may change its point of contact upon reasonable notice to the other Party.

5.1.1. For WSMR -

5.1.1.1. White Sands Missile Range, Directorate of Emergency Services, 575-678-1234 or 575-678-2503.

5.1.2. For New Mexico Department of Public Safety-State Police Division-

5.1.2.1. Department of Public Safety, Major Daniel Lovato 505-827-9054

5.2. CORRESPONDENCE: All correspondence to be sent and notices to be given pursuant to this MOU will be addressed, if to the WSMR, to-

5.2.1. WSMR

Attn: Don Morrison  
WSMR, NM 88002

and, if to the New Mexico Department of Public Safety-State Police Division, to-

5.2.2. Department of Public Safety  
Cabinet Secretary Gregory J. Fouratt

P.O. Box 1628  
Santa Fe, NM 87504

5.3. FUNDS AND MANPOWER: This MOU does not document nor provide for the exchange of funds or manpower between the Parties nor does it make any commitment of funds or resources.

5.4. MODIFICATION OF MOU: This MOU may only be modified by the written agreement of the Parties, duly signed by their authorized representatives. This MOU will be reviewed annually on or around the anniversary of its effective date, and triennially in its entirety.

5.5. DISPUTES: Any disputes relating to this MOU will, subject to any applicable law, Executive Order, Directive, or Instruction, be resolved by consultation between the Parties or in accordance with DoDI 4000.19.

5.6 LIABILITY: Each party hereby waives all claims against every other party for compensation for expenses occurring as a consequence of the performance of this agreement unless otherwise detailed in this agreement. Further, nothing herein shall be construed as requiring any party to act in violation of any Federal, State, or local statute, rule, or regulation including, but not limited to, the Anti-Deficiency Act and the New Mexico equivalent thereof. To the extent that claims or lawsuits result from the actions of either party, issues of liability will be resolved under the purview of the Federal Tort Claims Act or the New Mexico Tort Claims Act as appropriate.

5.7. TERMINATION OF UNDERSTANDING: This MOU may be terminated in writing at will by either Party.

5.8. TRANSFERABILITY: This MOU is not transferable except with the written consent of the Parties.

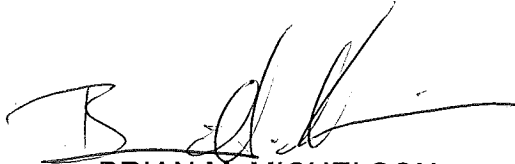
5.9. ENTIRE UNDERSTANDING: It is expressly understood and agreed that this MOU embodies the entire understanding between the Parties regarding the MOU's subject matter.

5.10. EFFECTIVE DATE: This MOU takes effect beginning on the day after the last Party signs.

5.11. EXPIRATION DATE: This MOU expires 9 years after the last signature below.

AGREED:

FOR WHITE SANDS MISSILE RANGE:



BRIAN M. MICHELSON  
Colonel, US Army  
Garrison Commander

DATE: 24 Feb 16

FOR NEW MEXICO DEPARTMENT OF  
PUBLIC SAFETY:



GREGORY J. FOURATT  
Cabinet Secretary  
New Mexico Department of Public Safety

DATE: ~~2/9/16~~ 2/9/16

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**DEPARTMENT OF THE ARMY**  
U.S. ARMY GARRISON WHITE SANDS MISSILE RANGE  
100 Headquarters Avenue  
WHITE SANDS MISSILE RANGE, NEW MEXICO 88002-5000

MEMORANUM OF UNDERSTANDING  
BETWEEN  
GARRISON COMMANDER, US ARMY WHITE SANDS MISSILE RANGE (WSMR),  
NEW MEXICO  
AND  
MCKINLEY COUNTY SHERIFF'S OFFICE, NEW MEXICO  
FOR

Law Enforcement Support for felonies, misdemeanors, major disruptions, natural disasters, special threats/circumstance and traffic accidents on Fort Wingate Depot Activity (FWDA) and Launch Complex (FWLC). Any Special Response Team (SRT), Explosive Ordnance Disposal Team (EOD), Special Operation Working Dogs, if available, when military support is not available, and Intelligence Sharing.

This is a Memorandum of Understanding (MOU) between the White Sands Missile Range Garrison Commander, and the McKinley County Sheriff's Office.

1. AUTHORITIES:

- 1.1. Army Regulation (AR) 525-13, Antiterrorism, dated 11 September 2008.
- 1.2. Army Regulation 190-14, Carrying of Firearms and Use of Force for Law Enforcement and Security Duties, dated 12 March 1993.
- 1.3. Army Regulation 190-58, Personal Security, dated 22 March 1989.
- 1.4. Army Regulation 190-56, Army Civilian Police and Security Guard Program, dated 15 March 2013.

2. PURPOSE: This agreement is for the transfer to McKinley County Sheriff's Office (MCSO) of various aspects of an Army law enforcement and security mission, to include barricaded subjects, hostage situations, special threat situations, sniper incidents, high threat raids, and warrant apprehension of dangerous individuals on FWDA and FWLC. This agreement compensates for the limited amount of military police/civilian police resources from WSMR, NM. Also, it provides for assistance in the capture/recovery of unauthorized person(s) and special equipment/material illegally removed from the FWDA/FWLC facilities, New Mexico.

3. UNDERSTANDINGS OF THE PARTIES:

- 3.1. The WSMR will-

3.1.1. Dispatch DA police/guard and Military Police personnel and equipment for initial response to any special threat situation as distance and time lines allow for potential follow up coordination to the MCSO, FBI, or the US Army Criminal Investigations Division (CID).

3.1.2. Provide intelligence and logistical support on a limited basis, as determined by the Garrison Commander or his/her designee.

3.1.3. Provide site briefings and installation vulnerability assessments, as determined by the Garrison Commander or his/her designee.

3.1.4. Provide operational support as requested by the MCSO or NMDPS-SPD (as applicable in each document) for the response to activities on FWDA/FWLC.

3.1.5. Provide criminal intelligence and law enforcement information obtained by the Army to the McKinley County Sheriff's Office to the extent authorized by applicable law and Service regulations.

3.1.6. WSMR Public Affairs Office, will be responsible for the release of any information regarding an incident that occurs on WSMR, FWAD, and FWLC.

3.2. The McKinley County Sheriff's Office will-

3.2.1. Respond to requests for support.

3.2.2. Provide State of New Mexico or federally certified Law Enforcement personnel upon request from WSMR.

3.2.3. Provide all equipment, supplies, and transportation necessary for the MCSO to accomplish its mission at WSMR.

3.2.4. Respond to WSMR requests for assistance in a reasonable amount of time as determined by the circumstances and response required. Events where MCSO is affected by similar events and an assessment of requested resources is determined the response will be based upon time, distance and staffing.

3.2.5. Coordinate with the Garrison Commander, WSMR, Incident Commander (IC), or the authorized Government Representative upon arrival at FWDA/FWLC. WSMR shall retain control over decisions regarding plans where the use of force/deadly force may be necessary by the Department of Army (DA) police/guard, Military Police and MCSO officers prior to any action taking place. Once the plan is approved and the teams are executing the actions and physically committed to the action use of force decisions transfer to the operational teams.

3.2.5.1. Upon notification of unauthorized removal of Army or Army contractor property from FWDA/FWLC, utilize all available support (personnel and equipment) to assist in the capture of responsible personnel and recovery of the items.

3.2.5.2. Hold the item and the persons responsible for its removal until transferred to competent civilian/military authority.

3.2.5.3. Provide emergency notification for major events that take place in any of the Fort Wingate Army property, and all reports involving an incident to the WSMR DES as soon as available

3.2.5.4. Provide information, to include intelligence analyses, concerning criminal activities affecting the security of Army activities and personnel to WSMR DES. Such information includes organized crime, terrorism, narcotics trafficking, and other criminal activity involving Army personnel, missions, and property. The Agency will also cooperate with WSMR DES or other Army investigative organizations in matters arising from Army activities, to include sharing investigative information and participating in joint investigations, to the extent authorized by law.

4. PERSONNEL: Each Party is responsible for all costs of its personnel, including pay and benefits, support, and travel. Each Party is responsible for supervision and management of its personnel.

5. GENERAL PROVISIONS:

5.1. POINTS OF CONTACT: The following points of contact (POC) will be used by the Parties to communicate in the implementation of this MOU. Each Party may change its point of contact upon reasonable notice to the other Party.

5.1.1. For WSMR -

5.1.1.1. White Sands Missile Range, Directorate of Emergency Services, 575-678-1234 or 575-678-2503.

5.1.2. For McKinley County Sheriff's Office-

5.1.2.1. McKinley County Sheriff's Office, 505-863-1410

5.2. CORRESPONDENCE: All correspondence to be sent and notices to be given pursuant to this MOU will be addressed, if to the WSMR, to-

5.2.1. WSMR

Attn: Don Morrison  
WSMR, NM 88002

and, if to the McKinley County Sheriff's Office, to-

5.2.2. McKinley County Sheriff's Office

300 B. West Nizhoni, Boulevard  
Attn: Sheriff Ron Silversmith  
Gallop, NM 87301

5.3. FUNDS AND MANPOWER: This MOU does not document nor provide for the exchange of funds or manpower between the Parties nor does it make any commitment of funds or resources.

5.4. MODIFICATION OF MOU: This MOU may only be modified by the written agreement of the Parties, duly signed by their authorized representatives. This MOU will be reviewed annually on or around the anniversary of its effective date, and triennially in its entirety.

5.5. DISPUTES: Any disputes relating to this MOU will, subject to any applicable law, Executive Order, Directive, or Instruction, be resolved by consultation between the Parties or in accordance with DoDI 4000.19.

5.6 LIABILITY: Each party hereby waives all claims against every other party for compensation for expenses occurring as a consequence of the performance of this agreement unless otherwise detailed in this agreement. Further, nothing herein shall be construed as requiring any party to act in violation of any Federal, State, or local statute, rule, or regulation including, but not limited to, the Anti-Deficiency Act and the New Mexico equivalent thereof. To the extent that claims or lawsuits result from the actions of either party, issues of liability will be resolved under the purview of the Federal Tort Claims Act or the New Mexico Tort Claims Act as appropriate.

5.7. TERMINATION OF UNDERSTANDING: This MOU may be terminated in writing at will by either Party.

5.8. TRANSFERABILITY: This MOU is not transferable except with the written consent of the Parties.

5.9. ENTIRE UNDERSTANDING: It is expressly understood and agreed that this MOU embodies the entire understanding between the Parties regarding the MOU's subject matter.


5.10. EFFECTIVE DATE: This MOU takes effect beginning on the day after the last Party signs.

5.11. EXPIRATION DATE: This MOU expires 9 years after the last signature below.

AGREED:

FOR WHITE SANDS MISSILE RANGE:

FOR MCKINLEY COUNTY SHERIFF'S  
OFFICE:



RONALD D. BROWN  
COL, LG  
Commanding

DATE: 20 SEP 14



RON SILVERSMITH  
McKinley County Sheriff  
McKinley County Sheriff Office

DATE: 09-01-14

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**ATTACHMENT 12:**  
**FWDA'S RCRA CONTAINER STORAGE AREA CHECKLIST**

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## FWDA's RCRA Container Storage Area Checklist

Date: \_\_\_\_\_ Time: \_\_\_\_\_ Inspector's Name: \_\_\_\_\_

Checked/ Observations/ Repairs Made	Requirement	Regulatory Citation
<b>Satellite Accumulation Area</b>		
	Is waste accumulated at or near the point of generation and "under the control of the operator"?	§262.34(c)(1)
	Container is marked with the words "Hazardous Waste" or other identifying information.	§262.34(c)(1)
	Container is less than 55 gallons of HW or less than 1 quart of acute HW.	§262.34(c)(1)
	Container is in good condition and non-leaking.	§265.171
	Waste is compatible with container that it is stored in.	§265.172
	Container is closed except when adding or removing waste.	§265.173(a)
<b>90 Day Container Storage Area</b>		
<b>Container Requirements -- Part 262</b>		
	Container is marked with the accumulation start date.	§262.34(a)(2)
	Container is marked with the words "Hazardous Waste".	§262.34(a)(3)
<b>Container Requirements -- Part 265, Subpart I<sup>1</sup></b>		
	Container is in good condition and non-leaking.	§265.171
	Waste is compatible with container it is stored in.	§265.172
	Container is closed except when adding or removing waste.	§265.173(a)
	Container not stored in a way that would cause it to spill or leak.	§265.173(b)
	Weekly inspections are conducted.	§265.174
	Ignitable and reactive wastes are stored at least 15 meters (50 feet) from facility's property line.	§265.176
<b>Pre-Transport Requirements -- Part 262, Subpart C</b>		
	Packaging: Containers meet all applicable standards for the type of waste they hold. (See DOT regs at 49 CFR Parts 173, 178, and 179.)	§262.30
	Labeling (DOT Warning Labels): (See DOT Regs under 49 CFR 172)	§262.31
	Marking: Containers of 119 gallons or less must comply with DOT regs at 49 CFR Part 172. This includes the "proper shipping name" -- 49 CFR 172.301. Containers must also be marked with the following words and information: 1. "HAZARDOUS WASTE - Federal Law Prohibits Improper Disposal. If found, contact the nearest police or public safety authority or the U.S. Environmental Protection Agency." 2. Generator's name and address. 3. Generator's EPA ID number. 4. Manifest tracking number.	§262.32
<b>Preparedness and Prevention -- Part 265, Subpart C<sup>2</sup></b>		
	Facility is maintained in a manner to prevent fires, explosions, or spills.	§265.31
	Facility must be equipped with (unless hazards posed would not require): 1. Internal communications to signal emergency to facility personnel. 2. Communication device to alert local emergency response personnel. 3. Fire extinguishers. 4. Fire suppression: adequate water supply or foam-producing equipment.	§265.32
	Testing and maintenance of equipment.	§265.33
	Immediate access to communication equipment when handling hazardous waste.	§265.34
	Adequate aisle space.	§265.35

Notes:

<sup>1</sup> = Required by §§262.34(a)(1) and 262.34(d)

<sup>2</sup> = Required by §§262.34(a)(4) and 262.34(d)

CFR = Code of Federal Regulations  
DOT = U.S. Department of Transportation  
EPA = U.S. Environmental Protection Agency

FWDA = Fort Wingate Depot Activity  
HW = Hazardous Waste  
RCRA = Resource Conservation and Recovery Act

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**ATTACHMENT 13:**  
**WASTE MANAGEMENT GUIDELINES**

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**FINAL**  
**Fort Wingate Depot Activity**  
**CONTRACTOR WASTE MANAGEMENT GUIDELINES**

**PURPOSE:** Guidelines to be followed by contractors generating/shipping Hazardous or Non-Hazardous Waste from Fort Wingate Depot Activity (FWDA).

**POLICY:** The policy at FWDA is to comply with all applicable local, state, federal and installation rules and regulations. All government and nongovernment organizations generating hazardous waste on BRACD/USACE projects must comply with large quantity generator requirements.

Point of Contacts: Primary: Richard Cruz, FWDA BRAC Caretaker, Trailer #3  
Secondary: USACE PM/POC On-Site, Trailer #1

**Coordination and General Guidelines:**

1. Coordinate all waste generation and shipments with Primary Point of Contact: Richard Cruz, FWDA BRAC Caretaker at (505) 905-2504 or (505) 862-2416, or Secondary Point of Contact: USACE PM/POC On-Site. It is the responsibility of the Primary and Secondary POC to ensure waste records and supporting documentation are complete and correct.
2. Contractor must hold a meeting/conference call with the Primary and secondary points of contact to discuss all anticipated waste management activities associated with a project prior to mobilization.
3. All Hazardous and Non-Hazardous waste management storage locations must be pre-approved by Primary and Secondary POC prior to generation. Contractor must submit map with location of storage areas for approval.
4. Contractors must notify Primary and/or Secondary POC prior to sampling for characterization.
5. Ensure all containers are labeled prior to placement of any waste in them. Include on label the Generation Date, Contractor Name, Parcel and Product Type.
6. When contractors have waste on-site, a weekly inspection/inventory must be completed and submitted to Primary or Secondary POC for submission to the Regulatory Compliance record, Vanessa Clark by the COB following the day of inspection. The primary or secondary POCs must be notified of any noncompliance findings immediately following the inspection.
7. A representative sample must be taken from each container to characterize the waste for manifesting. Samples from multiple waste containers cannot be composited. Generator knowledge cannot be used for characterizing waste at Fort Wingate unless approved by the BRACD BEC in advance of sampling.

**Hazardous or Non-Hazardous manifest form, the following must be included:**

1. Generator is Fort Wingate Depot, 7 Miles East of Gallup, Trailer #3 Fort Wingate, NM 87316, 505-862-2416.
2. NM identification number for FWDA – NM6213820974.
3. Fort Wingate Army Depot is considered a Large Quantity Generator (LQG), in accordance with 40 CFR Part 262.
4. Contractor's shipping Hazardous Waste must provide a Land Disposal Restriction (LDR) in accordance with 40 CFR Part 268.
5. Profiling:
  - a. All required shipping documentation including manifests, waste profile, executive summary of lab reports (if available), etc. need to be submitted to Primary and/or Secondary POC for approval and signature 5 working days prior to the shipment date.
  - b. Results of characterization must be returned to Primary and/or Secondary POC within 30 days after taking sample.
  - c. Generator Knowledge is not permitted unless otherwise approved by FWDA BRAC BEC. Each container must have a separate waste characterization sample.
6. Manifests - Hazardous and Non-Hazardous:
  - a. The waste carrier/transporter provides appropriate manifest to the contractor.

- b. The contractor is required to:
  - i. Ensure that the Primary and/or Secondary POC is available to sign the manifest on the scheduled day of shipment,
  - ii. Verify that each manifest is properly completed and signed by the Primary and/or Secondary POC ,
  - iii. Provide the Generator copy of the manifest to the Primary and/or Secondary POC and all supporting documentation,
  - iv. Ensure that the original Generator copy of the manifest signed by the treatment storage disposal facility is returned to FWDA within 30 days of the shipping date for Hazardous and Non-Hazardous Waste. If it is not, The Primary and Secondary POC need to contact the BRACD BEC, transporter, disposal facility and Army contractor to resolve the issue.
  - v. The use of a Bill of Lading, in lieu of a non-hazardous waste manifest, must be approved by the FWDA Caretaker.

**All satellite accumulation storage sites and containers will comply with 40CFR 262.34(c) (1):**

- 1. Any Material that is subject to Hazardous Waste Manifest Requirements of the US Environmental Protection Agency must comply with 40 CFR Part 262.
- 2. Prior to the any waste being placed in a satellite storage container, proper labeling must be on the container (proper labeling includes date, contractors name, phone number and product type).
- 3. Pending analysis label is to be used from the time the sample is taken or until the results are received.
- 4. In no case will waste labeled pending analysis exceed 45 days. Containers pending analysis must be managed as if they are hazardous until the testing results are received.

All FWDA Hazardous and Non-Hazardous manifests, supporting documentation records including inspections are maintained as part of the Administrative Record, Regulatory Compliance Files (Trailer #1) for three years by Sundance Consulting, Vanessa Clark, Trailer #1. After three years the records will be permanently stored in the administrative record files in Trailer #2.

**ATTACHMENT 14:**  
**HAZARDOUS WASTE TRACKING LOG**

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## Hazardous Waste Tracking Log

Project Name: Fort Wingate Depot Activity

Project Location: McKinley County, New Mexico

Profile/Container Identification Number	Waste Description	Container Type	Quantity	Date Moved to 90-Day Storage	Transportation Date	Shipped to Address	Waste Manifest Tracking Number	Notes

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**ATTACHMENT 15:  
CONTAINER LOG**

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### Container Log

Project Name: Fort Wingate Depot Activity  
Project Location: McKinley County, New Mexico

Date	Waste Description	Container Type	Quantity	Origin of Waste	Signature

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**ATTACHMENT 16:**  
**TRAINING REQUIREMENTS, CERTIFICATIONS, AND JOB TITLES**

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## **Job Titles--**

**Richard Cruz, BRACD Site Manager**

**Ricky Albrecht, BRACD Maintenance Worker**

## **Job Descriptions--**

### 1) Richard Cruz:

- Maintain and operate B-1007 (90-Day Container Storage Area)
- Review & Sign Universal/Special/Non-Hazardous/Hazardous Waste Manifests
- Implement the Hazardous Waste Contingency Plan (HWCP)
- Act as Emergency Response Coordinator
- May perform hazardous waste management duties and/or hazardous waste worker duties in permitted or regulated facilities. Duties may involve one or more of the following: management, coordination, engineering, or technical work involving hazardous waste management programs or projects; and/or movement, containerization, storage, identification, recordkeeping, emergency response, treatment, and/or disposition of hazardous waste. Such duties require the ability to interpret and implement environmental regulations; knowledge of hazardous waste products and safety regulations; and the skill to affect regulatory requirements and ensure proper management and/or handling of hazardous wastes.

### 2) Ricky Albrecht:

- Maintain and operate B-1007 (90-Day Container Storage Area)
- Implement the HWCP
- Act as Emergency Response Coordinator Alternate

## **Training--**

### 1) Richard Cruz, BRAC Site Manager:

- Hazardous Waste Operations and Emergency Response (HAZWOPER) (40-hour Course) Supervisor – 29 CFR 1910.120 + annual refresher
- USACE Hazardous Waste Management and Manifesting Course or equivalent + recurrent training every 24 months
- OSHA First Responder Operations – 29 CFR 1910.120(q) + annual refresher
- OSHA On Scene Incident Commander – 29 CFR 1910.120(q)(6)(v) + annual refresher
- RCRA Hazardous Waste – 40 CFR §261.5 + annual refresher
- First Aid/Cardiopulmonary Resuscitation (CPR)/Automated External Defibrillator (AED) [every two years]

2) Ricky Albrecht, Maintenance Worker:

- HAZWOPER (40-hour Course) – 29 CFR 1910.120 + annual refresher
- OSHA First Responder Operations – 29 CFR 1910.120(q) + annual refresher
- OSHA On Scene Incident Commander – 29 CFR 1910.120(q)(6)(v) + annual refresher
- RCRA Hazardous Waste – 40 CFR §261.5 + annual refresher

**Job Title--**

FWDA Administrative Record: Administrative Assistant, Sundance Consulting

- Maintain Hazardous Waste generation and shipping records for FWDA
- Maintain Hazardous Waste audit trail from point of generation to disposal (Cradle to Grave)

**Training--**

- RCRA Hazardous Waste – 40 CFR §261.5+ annual refresher