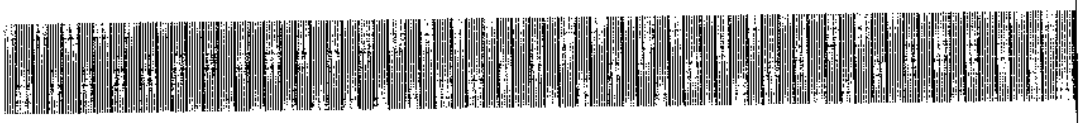
US Army Corps of Engineers ®
Fort Worth District

Fort Wingate Depot Activity
Revised RCRA Class 3 Permit Modification Application
Corrective Action Management Unit
January 2010 (rev. April 2010)

1. Revised Part A Application Forms/Text (Amendment #6)

a. **RCRA Subtitle C Site Identification Form**
b. **Hazardous Waste Permit Information Form**
c. **Revised Draft Part A Application Text**



MALCOLM PIRNIE

PIKA INTERNATIONAL, INC.

4285064

US Army Corps of Engineers
Fort Worth District

Fort Wingate Depot Activity
Revised RCRA Class 3 Permit Modification Application
Corrective Action Management Unit
January 2010 (rev. April 2010)

1a. RCRA Subtitle C Site Identification Form (Amendment #6)

4285064

MALCOLM PIRNIE

OMB# 2050-0024; Expires 11/30/2011

SEND COMPLETED FORM TO: The Appropriate State or Regional Office.

United States Environmental Protection Agency
RCRA SUBTITLE C SITE IDENTIFICATION FORM

1. Reason for Submittal (MARK ALL BOX(ES) THAT APPLY)

Reason for Submittal:

- ☐ To provide an Initial Notification (first time submitting site identification information / to obtain an EPA ID number for this location)
- ☐ To provide a Subsequent Notification (to update site identification information for this location)
- ☐ As a component of a First RCRA Hazardous Waste Part A Permit Application
- ☒ As a component of a Revised RCRA Hazardous Waste Part A Permit Application (Amendment # 6)
- ☐ As a component of the Hazardous Waste Report (If marked, see sub-bullet below)
  - ☐ Site was a TSD facility and/or generator of ≥1,000 kg of hazardous waste, >1 kg of acute hazardous waste, or >100 kg of acute hazardous waste spill cleanup in one or more months of the report year (or State equivalent LQG regulations)

2. Site EPA ID Number

EPA ID Number: NM 6213820974

3. Site Name

Name: Fort Wingate Depot Activity

4. Site Location Information

Street Address: U.S. Highway 66

City, Town, or Village: Gallup | **County:** McKinley

State: NM | **Country:** U.S.A. | **Zip Code:** 87301

5. Site Land Type

☐ Private ☐ County ☐ District ☒ Federal ☐ Tribal ☐ Municipal ☐ State ☐ Other

6. NAICS Code(s) for the Site (at least 5-digit codes)

A. 928110 | C. | B. | D.

7. Site Mailing Address

Street or P.O. Box: Ravenna Ammunition Plant, BRAC Environmental Coordinator, Bldg 1037

City, Town, or Village: Ravenna

State: OH | **Country:** U.S.A. | **Zip Code:** 44266

8. Site Contact Person

First Name: Mark | **MI:** C | **Last:** Patterson

Title: BRAC Environmental Coordinator

Street or P.O. Box: Ravenna Ammunition Plant

City, Town or Village: Ravenna

State: OH | **Country:** U.S.A. | **Zip Code:** 44266

Email: mark.c.patterson@us.army.mil

Phone: 330-358-7312 | **Ext.:** | **Fax:**

9. Legal Owner and Operator of the Site

A. Name of Site's Legal Owner: Base Realignment and Closure | **Date Became Owner:** 10/01/2002

Owner Type: ☐ Private ☐ County ☐ District ☒ Federal ☐ Tribal ☐ Municipal ☐ State ☐ Other

Street or P.O. Box: U.S. Department of the Army, 600 Army Pentagon

City, Town, or Village: Washington | **Phone:**

State: District of Columbia | **Country:** U.S.A. | **Zip Code:** 22130

B. Name of Site's Operator: William J. O'Donnell, II, Program Manager | **Date Became Operator:** 07/01/2006

Operator Type: ☐ Private ☐ County ☐ District ☒ Federal ☐ Tribal ☐ Municipal ☐ State ☐ Other

10. Type of Regulated Waste Activity (at your site)
Mark "Yes" or "No" for all current activities (as of the date submitting the form); complete any additional boxes as instructed.

A. Hazardous Waste Activities; Complete all parts 1-7.

Y ☒ N ☐ **1. Generator of Hazardous Waste**
If "Yes", mark only one of the following – a, b, or c.

- ☐ a. LQG: Generates, in any calendar month, 1,000 kg/mo (2,200 lbs./mo.) or more of hazardous waste; **or** Generates, in any calendar month, or accumulates at any time, more than 1 kg/mo (2.2 lbs./mo) of acute hazardous waste; **or** Generates, in any calendar month, **or** accumulates at any time, more than 100 kg/mo (220 lbs./mo) of acute hazardous spill cleanup material.
- ☐ b. SQG: 100 to 1,000 kg/mo (220 – 2,200 lbs./mo) of non-acute hazardous waste.
- ☒ c. CESQG: Less than 100 kg/mo (220 lbs./mo) of non-acute hazardous waste.

If "Yes" above, indicate other generator activities.

Y ☐ N ☒ d. Short-Term Generator (generate from a short-term or one-time event and not from on-going processes). If "Yes", provide an explanation in the Comments section.

Y ☐ N ☒ e. United States Importer of Hazardous Waste

Y ☐ N ☒ f. Mixed Waste (hazardous and radioactive) Generator

Y ☐ N ☒ **2. Transporter of Hazardous Waste**
If "Yes", mark all that apply.
- ☐ a. Transporter
- ☐ b. Transfer Facility (at your site)

Y ☒ N ☐ **3. Treater, Storer, or Disposer of Hazardous Waste** Note: A hazardous waste permit is required for these activities.

Y ☐ N ☒ **4. Recycler of Hazardous Waste**

Y ☐ N ☒ **5. Exempt Boiler and/or Industrial Furnace**
If "Yes", mark all that apply.
- ☐ a. Small Quantity On-site Burner Exemption
- ☐ b. Smelting, Melting, and Refining Furnace Exemption

Y ☐ N ☒ **6. Underground Injection Control**

Y ☐ N ☒ **7. Receives Hazardous Waste from Off-site**

B. Universal Waste Activities; Complete all parts 1-2.

Y ☐ N ☒ **1. Large Quantity Handler of Universal Waste (you accumulate 5,000 kg or more) [refer to your State regulations to determine what is regulated]. Indicate types of universal waste managed at your site. If "Yes", mark all that apply.**

- a. Batteries ☐
- b. Pesticides ☐
- c. Mercury containing equipment ☐
- d. Lamps ☐
- e. Other (specify) _____ ☐
- f. Other (specify) _____ ☐
- g. Other (specify) _____ ☐

Y ☐ N ☒ **2. Destination Facility for Universal Waste**
Note: A hazardous waste permit may be required for this activity.

C. Used Oil Activities; Complete all parts 1-4.

Y ☐ N ☒ **1. Used Oil Transporter**
If "Yes", mark all that apply.
- ☐ a. Transporter
- ☐ b. Transfer Facility (at your site)

Y ☐ N ☒ **2. Used Oil Processor and/or Re-refiner**
If "Yes", mark all that apply.
- ☐ a. Processor
- ☐ b. Re-refiner

Y ☐ N ☒ **3. Off-Specification Used Oil Burner**

Y ☐ N ☒ **4. Used Oil Fuel Marketer**
If "Yes", mark all that apply.
- ☐ a. Marketer Who Directs Shipment of Off-Specification Used Oil to Off-Specification Used Oil Burner
- ☐ b. Marketer Who First Claims the Used Oil Meets the Specifications

D. **Eligible Academic Entities with Laboratories—Notification for opting into or withdrawing from managing laboratory hazardous wastes pursuant to 40 CFR Part 262 Subpart K**

- You must check with your State to determine if you are eligible to manage laboratory hazardous wastes pursuant to 40 CFR Part 262 Subpart K

☐ 1. Opting into or currently operating under 40 CFR Part 262 Subpart K for the management of hazardous wastes in laboratories **See the item-by-item instructions for definitions of types of eligible academic entities. Mark all that apply:**

☐ a. College or University

☐ b. Teaching Hospital that is owned by or has a formal written affiliation agreement with a college or university

☐ c. Non-profit Institute that is owned by or has a formal written affiliation agreement with a college or university

☐ 2. Withdrawing from 40 CFR Part 262 Subpart K for the management of hazardous wastes in laboratories

11. Description of Hazardous Waste

A. **Waste Codes for Federally Regulated Hazardous Wastes.** Please list the waste codes of the Federal hazardous wastes handled at your site. List them in the order they are presented in the regulations (e.g., D001, D003, F007, U112). Use an additional page if more spaces are needed.

D001	D003	D005	D006	D007	D008	D009
D030	K044					

B. **Waste Codes for State-Regulated (i.e., non-Federal) Hazardous Wastes.** Please list the waste codes of the State-Regulated hazardous wastes handled at your site. List them in the order they are presented in the regulations. Use an additional page if more spaces are needed.

12. Notification of Hazardous Secondary Material (HSM) Activity

Y ☐ N ☒ Are you notifying under 40 CFR 260.42 that you will begin managing, are managing, or will stop managing hazardous secondary material under 40 CFR 261.2(a)(2)(ii), 40 CFR 261.4(a)(23), (24), or (25)?

If "Yes", you must fill out the Addendum to the Site Identification Form: Notification for Managing Hazardous Secondary Material.

13. Comments

This form is being submitted as part of the Post-Closure Care Permit application for the RCRA Open Burning/Open Detonation (OD/OD) Corrective Action Management Unit (CAMU) at Fort Wingate Depot Activity (FWDA), Gallup, New Mexico.

14. Certification. I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment for knowing violations. For the RCRA Hazardous Waste Part A Permit Application, all owner(s) and operator(s) must sign (see 40 CFR 270.10(b) and 270.11).

Signature of legal owner, operator, or an authorized representative	Name and Official Title (type or print)	Date Signed (mm/dd/yyyy)
William J. O'Donnell II	William J. O'Donnell, II, PM	04/21/2010

US Army Corps of Engineers
Fort Worth District

Fort Wingate Depot Activity
Revised RCRA Class 3 Permit Modification Application
Corrective Action Management Unit
January 2010 (rev. April 2010)

1b. Hazardous Waste Permit Information Form (Amendment #6)

4285064

MALCOLM PIRNIE

EPA ID Number | N | M | 6 | 2 | 1 | 3 | 8 | 2 | 0 | 9 | 7 | 4 |

OMB#: 2050-0034; Expires 7/31/2012

United States Environmental Protection Agency

HARDOUS WASTE PERMIT INFORMATION FORM

1. Facility Permit Contact

First Name: Mark | **MI:** C | **Last Name:** Patterson

Contact Title: BRAC Environmental Coordinator

Phone: 330-358-7312 | **Ext.:** | **Email:** mark.c.patterson@us.army.mil

2. Facility Permit Contact Mailing Address

Street or P.O. Box: Ravenna Ammunition Plant, BRAC Environmental Coordinator, Bldg 1037

City, Town, or Village: Ravenna

State: OH

Country: U.S.A. | **Zip Code:** 44266

3. Operator Mailing Address and Telephone Number

Street or P.O. Box: William J. O'Donnell, II, Program Manager, 600 Army Pentagon

City, Town, or Village: Washington

State: D.C. | **Phone:** 703-601-1570

Country: U.S.A. | **Zip Code:** 22130

4. Facility Existence Date

Facility Existence Date (mm/dd/yyyy): 02/25/1941

5. Other Environmental Permits

A. Facility Type (Enter code)	B. Permit Number	C. Description
N	NMR05B063	NPDES Multi-Sector Storm Water Permit

6. Nature of Business:

FWDA is an inactive US Army Deport whose former mission was to store, ship, and receive material and to dispose of obsolete or deteriorated explosives and military munitions. Part of the FWDA mission was treatment of waste military munitions and related materials using open burning (OD) or open detonation (OD) processes.

7. Process Codes and Design Capacities – Enter information in the Section on Form Page 3

A. PROCESS CODE – Enter the code from the list of process codes below that best describes each process to be used at the facility. If more lines are needed, attach a separate sheet of paper with the additional information. For "other" processes (i.e., D99, S99, T04 and X99), describe the process (including its design capacity) in the space provided in Item 8.

B. PROCESS DESIGN CAPACITY – For each code entered in Item 7.A; enter the capacity of the process.

1. **AMOUNT – Enter the amount. In a case where design capacity is not applicable (such as in a closure/post-closure or enforcement action) enter the total amount of waste for that process.**
2. **UNIT OF MEASURE – For each amount entered in Item 7.B(1), enter the code in Item 7.B(2) from the list of unit of measure codes below that describes the unit of measure used. Select only from the units of measure in this list.**

C. PROCESS TOTAL NUMBER OF UNITS – Enter the total number of units for each corresponding process code.

Process Code	Process	Appropriate Unit of Measure for Process Design Capacity
Disposal		
D79	Underground Injection Well Disposal	Gallons; Liters; Gallons Per Day; or Liters Per Day
D80	Landfill	Acre-feet; Hectares-meter; Acres; Cubic Meters; Hectares; Cubic Yards
D81	Land Treatment	Acres or Hectares
D82	Ocean Disposal	Gallons Per Day or Liters Per Day
D83	Surface Impoundment Disposal	Gallons; Liters; Cubic Meters; or Cubic Yards
D99	Other Disposal	Any Unit of Measure Listed Below
Storage		
S01	Container	Gallons; Liters; Cubic Meters; or Cubic Yards
S02	Tank Storage	Gallons; Liters; Cubic Meters; or Cubic Yards
S03	Waste Pile	Cubic Yards or Cubic Meters
S04	Surface Impoundment	Gallons; Liters; Cubic Meters; or Cubic Yards
S05	Drip Pad	Gallons; Liters; Cubic Meters; Hectares; or Cubic Yards
S06	Containment Building Storage	Cubic Yards or Cubic Meters
S99	Other Storage	Any Unit of Measure Listed Below
Treatment		
T01	Tank Treatment	Gallons Per Day; Liters Per Day
T02	Surface Impoundment	Gallons Per Day; Liters Per Day
T03	Incinerator	Short Tons Per Hour; Metric Tons Per Hour; Gallons Per Hour; Liters Per Hour; BTUs Per Hour; Pounds Per Hour; Short Tons Per Day; Kilograms Per Hour; Gallons Per Day; Metric Tons Per Hour; or Million BTU Per Hour
T04	Other Treatment	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Short Tons Per Day; BTUs Per Hour; Gallons Per Day; Liters Per Hour; or Million BTU Per Hour
T80	Boiler	Gallons; Liters; Gallons Per Hour; Liters Per Hour; BTUs Per Hour; or Million BTU Per Hour

Process Code	Process	Appropriate Unit of Measure for Process Design Capacity (for T81 – T94)
Treatment (Continued)		
T81	Cement Kiln	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; BTU Per Hour; Liters Per Hour; Kilograms Per Hour; or Million BTU Per Hour
T82	Lime Kiln	
T83	Aggregate Kiln	
T84	Phosphate Kiln	
T85	Coke Oven	
T86	Blast Furnace	
T87	Smelting, Melting, or Refining Furnace	
T88	Titanium Dioxide Chloride Oxidation Reactor	
T89	Methane Reforming Furnace	
T90	Pulping Liquor Recovery Furnace	
T91	Combustion Device Used in the Recovery of Sulfur Values from Spent Sulfuric Acid	
T92	Halogen Acid Furnaces	
T93	Other Industrial Furnaces Listed in 40 CFR 260.10	
T94	Containment Building Treatment	Cubic Yards; Cubic Meters; Short Tons Per Hour; Gallons Per Hour; Liters Per Hour; BTU Per Hour; Pounds Per Hour; Short Tons Per Day; Kilograms Per Hour; Metric Tons Per Day; Gallons Per Day; Liters Per Day; Metric Tons Per Hour; or Million BTU Per Hour
Miscellaneous (Subpart X)		
X01	Open Burning/Open Detonation	Any Unit of Measure Listed Below
X02	Mechanical Processing	Short Tons Per Hour; Metric Tons Per Hour; Short Tons Per Day; Metric Tons Per Day; Pounds Per Hour; Kilograms Per Hour; Gallons Per Hour; Liters Per Hour; or Gallons Per Day
X03	Thermal Unit	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; BTU Per Hour; or Million BTU Per Hour
X04	Geologic Repository	Cubic Yards; Cubic Meters; Acre-feet; Hectare-meter; Gallons; or Liters
X99	Other Subpart X	Any Unit of Measure Listed Below

Unit of Measure	Unit of Measure Code
Gallons	G
Gallons Per Hour	E
Gallons Per Day	U
Liters	L
Liters Per Hour	H
Liters Per Day	V
Short Tons Per Hour	D
Short Tons Per Day	N
Metric Tons Per Hour	W
Metric Tons Per Day	S
Pounds Per Hour	J
Kilograms Per Hour	X
Million BTU Per Hour	X
Cubic Yards	Y
Cubic Meters	C
Acres	B
Acre-feet	A
Hectares	Q
Hectare-meter	F
BTU Per Hour	I

EPA ID Number | N | M | 6 | 2 | 1 | 3 | 8 | 2 | 0 | 9 | 7 | 4 |

OMB#: 2050-0034; Expires 7/31/2012

7. Process Codes and Design Capacities (Continued)

EXAMPLE FOR COMPLETING Item 7 (shown in line number X-1 below): A facility has a storage tank, which can hold 533.788 gallons.

Line Number		A. Process Code (From list above)			B. PROCESS DESIGN CAPACITY (1) Amount (Specify)	B. PROCESS DESIGN CAPACITY (2) Unit of Measure	C. Process Total Number of Units
X	1	S	0	2	533.788	G	001
	1	X	0	1	200.0	J	001
	2	X	0	1	0.00	J	001
	3						
	4						
	5						
	6						
	7						
	8						
	9						
1	0						
1	1						
1	2						
1	3						

Note: If you need to list more than 13 process codes, attach an additional sheet(s) with the information in the same format as above. Number the line sequentially, taking into account any lines that will be used for "other" process (i.e., D99, S99, T04, and X99) in Item 8.

8. Other Processes (Follow instructions from Item 7 for D99, S99, T04, and X99 process codes)

Line Number (Enter #s in sequence with Item 7)		A. Process Code (From list above)			B. PROCESS DESIGN CAPACITY (1) Amount (Specify)	(2) Unit of Measure	C. Process Total Number of Units
X	2	T	0	4	100.00	U	001

9. Description of Hazardous Wastes - Enter Information in the Sections on Form Page 5

A. EPA HAZARDOUS WASTE NUMBER – Enter the four-digit number from 40 CFR, Part 261 Subpart D of each listed hazardous waste you will handle. For hazardous wastes which are not listed in 40 CFR, Part 261 Subpart D, enter the four-digit number(s) from 40 CFR Part 261, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.

B. ESTIMATED ANNUAL QUANTITY – For each listed waste entered in Item 9.A, estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in Item 9.A, estimate the total annual quantity of all the non-listed waste(s) that will be handled which possess that characteristic or contaminant.

C. UNIT OF MEASURE – For each quantity entered in Item 9.B, enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE	CODE	METRIC UNIT OF MEASURE	CODE
POUNDS	P	KILOGRAMS	K
TONS	T	METRIC TONS	M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure, taking into account the appropriate density or specific gravity of the waste.

D. PROCESSES

1. PROCESS CODES:

For listed hazardous waste: For each listed hazardous waste entered in Item 9.A, select the code(s) from the list of process codes contained in Items 7.A and 8.A on page 3 to indicate all the processes that will be used to store, treat, and/or dispose of all listed hazardous wastes.

For non-listed waste: For each characteristic or toxic contaminant entered in Item 9.A, select the code(s) from the list of process codes contained in Items 7.A and 8.A on page 3 to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.

NOTE: THREE SPACES ARE PROVIDED FOR ENTERING PROCESS CODES. IF MORE ARE NEEDED:

1. **Enter the first two as described above.**
2. **Enter "000" in the extreme right box of Item 9.D(1).**
3. **Use additional sheet, enter line number from previous sheet, and enter additional code(s) in Item 9.E.**

2. PROCESS DESCRIPTION: If code is not listed for a process that will be used, describe the process in Item 9.D(2) or in Item 9.E(2).

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER – Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

1. **Select one of the EPA Hazardous Waste Numbers and enter it in Item 9.A. On the same line complete Items 9.B, 9.C, and 9.D by estimating the total annual quantity of the waste and describing all the processes to be used to store, treat, and/or dispose of the waste.**
2. **In Item 9.A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In Item 9.D.2 on that line enter "included with above" and make no other entries on that line.**
3. **Repeat step 2 for each EPA Hazardous Waste Number that can be used to describe the hazardous waste.**

EXAMPLE FOR COMPLETING Item 9 (shown in line numbers X-1, X-2, X-3, and X-4 below) – A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operations. In addition, the facility will treat and dispose of three non-listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

Line Number		A. EPA Hazardous Waste No. (Enter code)				B. Estimated Annual Qty of Waste	C. Unit of Measure (Enter code)	D. PROCESSES (1) PROCESS CODES (Enter Code)								(2) PROCESS DESCRIPTION (If code is not entered in 9.D(1))
X	1	K	0	5	4	900	P	T	0	3	D	8	0			
X	2	D	0	0	2	400	P	T	0	3	D	8	0			
X	3	D	0	0	1	100	P	T	0	3	D	8	0			
X	4	D	0	0	2											Included With Above

EPA ID Number N M 6 2 1 3 8 2 0 9 7 4

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9. Description of Hazardous Wastes *(Continued. Use additional sheet(s) as necessary; number pages as 5a, etc.)*

Line Number		A. EPA Hazardous Waste No. (Enter code)	B. Estimated Annual Qty of Waste	C. Unit of Measure (Enter code)	D. PROCESSES (1) PROCESS CODES (Enter Code)	D. PROCESSES (2) PROCESS DESCRIPTION (If code is not entered in 9.D(1))
	1	D001	52,000.0	P	X01	CAMU, see item 13
	2	D003				Included with above
	3	D005				"
	4	D006				"
	5	D007				"
	6	D008				"
	7	D009				"
	8	D030				"
	9					
1	0					
1	1					
1	2					
1	3					
1	4					
1	5					
1	6					
1	7					
1	8					
1	9					
2	0					
2	1					
2	2					
2	3					
2	4					
2	5					
2	6					
2	7					
2	8					
2	9					
3	0					
3	1					
3	2					
3	3					
3	4					
3	5					
3	6					

10. Map

Attach to this application a topographical map, or other equivalent map, of the area extending to at least one mile beyond property boundaries. The map must show the outline of the facility, the location of each of its existing intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all spring, rivers, and other surface water bodies in this map area. See instructions for precise requirements.

11. Facility Drawing

All existing facilities must include a scale drawing of the facility (see instructions for more detail).

12. Photographs

All existing facilities must include photographs (aerial or ground-level) that clearly delineate all existing structures; existing storage, treatment, and disposal areas; and sites of future storage, treatment, or disposal areas (see instructions for more detail).

13. Comments

Comments related to the Fort Wingate CAMU appear in Section 1c of the revised Class 3 Permit Modification Application, dated January 2010.

Notes for Items 7 and 9: Process design capacity and estimated annual quantity of waste amount are provided in pounds net explosive weight (NEW). For additional information see A3.0, text attachment to Part A.

US Army Corps of Engineers
Fort Worth District

Fort Wingate Depot Activity
Revised RCRA Class 3 Permit Modification Application
Corrective Action Management Unit
January 2010 (rev. April 2010)

1c. Revised Draft Part A Application Text (Amendment #6)

4285064

MALCOLM PIRNIE

A1.0 RCRA PART A INFORMATION

The modified RCRA Hazardous Waste Part A Permit application (Amendment #6) was prepared to support the Class 3 Permit Modification for a Corrective Action Management Unit (CAMU). All information in Amendment #5, dated June 12, 2003, continues to apply.

A2.0 RCRA SUBTITLE C SITE IDENTIFICATION FORM ITEM 9 - OPERATOR AND LEGAL OWNER

The U.S. Army has transferred command of this site from Tooele Army Depot to White Sands Missile Range. New contact information is now included in Item 9 of the RCRA Subtitle C Site Identification Form as well as in subsequent sections of the form where the Facility permit contact information is required.

A3.0 HAZARDOUS WASTE PERMIT INFORMATION FORM ITEM 7 - PROCESS AND DESIGN CAPACITIES

Processes identified in Item 7 include the Hazardous Waste Management Unit (HWMU) within the RCRA Interim Status Current OB/OD Area and the CAMU. The CAMU will be used for expediting treatment of CAMU-eligible wastes at the Facility. On line 1 of Item 7, the process design capacity for the wastes treated through OB/OD activities at the CAMU (process code X01) will be 200 pounds (lbs) net explosive weight (NEW) per hour. The weekly operational limit for the CAMU is 1,000 pounds (lbs) net explosive weight (NEW) and the annual maximum is 52,000 lbs NEW. For the HWMU referenced on line 2 of Item 7, the process code is also X01 but the design capacity is set at zero lbs per hour.

The CAMU will contain five impermanent demolition pits for the open burning and open detonation (OB/OD) treatment of waste military munitions (WMM) and bulk explosives. One of the demolition pits will be designated as the primary treatment pit. The other demolition pits will be used one at a time only if there is a need for excess capacity or a functional reason to change pits (e.g., a breach of a berm). When a burn is required, a single burn pan or box will be placed within a demolition pit. All open burning and open detonation operations will be performed in strict adherence to U.S. Army standard operating procedures or work plans. OB/OD operations will be conducted weekly at the CAMU. Operational procedures for the CAMU appear in Attachment 1 of the Revised Permit (Section 4b of this Revised Class 3 Permit Modification Application (application)).

A4.0 HAZARDOUS WASTE PERMIT INFORMATION FORM ITEM 9 - DESCRIPTION OF HAZARDOUS WASTE

The CAMU will be used to treat (through open burning or open detonation) ignitable (D001) and reactive (D003) hazardous wastes, such as Munitions and Explosives of Concern (MEC), including damaged, defective, expired, and unserviceable munitions. These waste types are generated during remediation activities. Other reactive and ignitable hazardous wastes are also treated that contain metals and organic compounds. Wastes are defined in Attachment 1 of the Revised Permit (Section 4b of this application).

UXO surveys conducted at FWDA over a period of six years have found 13,000 lbs NEW to date at FWDA, as described in Attachment 1 of the Revised Permit. Waste treatment in the CAMU will be at the rate of≤ 1,000 lbs NEW per week , for a maximum annual volume of≤52,000 lbs NEW per year. It should be noted that not all in-place residue and debris within the HWMUs are hazardous wastes. The exact volumes of individual hazardous wastes contained in the HWMUs are not known.

A5.0 HAZARDOUS WASTE PERMIT INFORMATION FORM ITEM 10 - MAP

As part of Amendment 6, Class 3 RCRA Permit Modification Application, a location and site map of the CAMU are included as Figures 1 and 4 (See Section 3 of this application).

A6.0 HAZARDOUS WASTE PERMIT INFORMATION FORM ITEM 11 - FACILITY DRAWING

As part of Amendment 6, Class 3 RCRA Permit Modification Application, Figures 1, 2, and 3 constitute the figure drawings of the CAMU (See Section 3 of this application). Figures 4 and 5 illustrate the location of the conditionally exempt igloos.

A7.0 HAZARDOUS WASTE PERMIT INFORMATION FORM ITEM 13 - COMMENTS

The CAMU will be at SWMU-14 (near the Old Burning Ground and Demolition Landfill Area) and will occupy approximately 3 acres. The CAMU will operate under RCRA Subpart S (40 CFR 264.552) and Subpart X (40 CFR 264.600), and will support the identification, storage, and treatment by open burning and open detonation of WMM. The resulting "safe to recycle" scrap metal or munitions

debris will be transported off-site for recycling or disposal in accordance with all local, state, and federal regulations, respectively.

The CAMU contains up to five impermanent demolition pits for the treatment of WMM. Both open burning and open detonation will occur within the demolition pits, though not at the same time. Items to be detonated will be placed directly on the earthen bottom of the pit, whereas items to be burned will be placed on a burn pan or box in the pit (or will be treated in an alternative, safe treatment unit with equivalent treatment performance). Incidental solid wastes (such as wooden ammunition boxes and containers) that can be safely separated from the munitions item/constituent (as determined by the Senior Unexploded Ordinance Supervisor on-site, will not be disposed by OB. Instead, it will be properly characterized, managed, and disposed in accordance with applicable requirements. Additional information is provided in Section 2 of this application (Revised Application Information for CAMU) and Attachment 1 of the Revised Permit.

Prior to treatment at the CAMU, the WMM will be stored in eight earth covered magazines (ECMs or igloos) in Explosive Storage Block B of FWDA.[1] The location of the storage ECMs is shown in Section 3, Figure 4, of this application (Revised Figures and Maps for CAMU) and Attachment 1 of the Revised Permit. The U.S. Army proposes to store the WMM under the Conditional Exemption (CE) provision in the Munitions Rule (62 Federal Register 6621) promulgated by the U.S. Environmental Protection Agency (USEPA) and adopted by the State of New Mexico. All of the qualifying conditions of the CE (e.g., the type of munitions that can be stored, how the munitions are stored, and notification and recordkeeping requirements) will be met, as described in the Standard Operating Procedures contained in Section 5f of this application. The ECMs are not part of the CAMU.

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[1] Igloos B-1028, B-1029, and B-1038 through B-1043 have been designated for the storage of WMM in support of the CAMU.

For Information Purposes Only

A1.0 RCRA PART A INFORMATION

The modified RCRA Hazardous Waste Part A Permit application (Amendment #6) was prepared to support the Class 3 Permit Modification for a Corrective Action Management Unit (CAMU). All information in Amendment #5, dated June 12, 2003, continues to apply.

A2.0 RCRA SUBTITLE C SITE IDENTIFICATION FORM ITEM 9 - OPERATOR AND LEGAL OWNER

The U.S. Army has transferred command of this site from Tooele Army Depot to White Sands Missile Range. New contact information is now included in Item 9 of the RCRA Subtitle C Site Identification Form as well as in subsequent sections of the form where the Facility permit contact information is required.

A3.0 HAZARDOUS WASTE PERMIT INFORMATION FORM ITEM 8 7 - PROCESS AND DESIGN CAPACITIES

Processes identified in Item 7 include the Hazardous Waste Management Unit (HWMU) within the RCRA Interim Status Current OB/OD Area and the CAMU. The CAMU will be used for expediting treatment of CAMU-eligible wastes at the Facility. On line 1 of Item 7, the process design capacity for the wastes treated through OB/OD activities at the CAMU (process code X01) will be 200 pounds (lbs) net explosive weight (NEW) per hour. The weekly operational limit for the CAMU is 1,000 pounds (lbs) net explosive weight (NEW) and the annual maximum is 52,000 lbs NEW. For the HWMU referenced on line 2 of Item 7, the process code is also X01 but the design capacity is set at zero lbs per hour.

The CAMU will contain five impermanent demolition pits for the open burning and open detonation (OB/OD) treatment of waste military munitions (WMM) and bulk explosives. One of the demolition pits will be designated as the primary treatment pit. The other demolition pits will be used one at a time only if there is a need for excess capacity or a functional reason to change pits (e.g., a breach of a berm). When a burn is required, a single burn pan or box will be placed within a demolition pit. All open burning and open detonation operations will be performed in strict adherence to U.S. Army standard operating procedures or work plans. OB/OD operations will be conducted weekly at the CAMU. Operational procedures for the CAMU appear in Attachment 1 of the Revised Permit (Section 4b of this Revised Class 3 Permit Modification Application (application)).

~~The total amount of waste has increased by 26 tons since the submission of the previous application amendment, as a result of the CAMU. The CAMU will be used only for expediting treatment of CAMU eligible wastes at the Facility. On line 9 of Item 8, the weekly operational limit for the CAMU is 1,000 pounds net explosive weight (NEW) and the annual maximum is 52,000 pounds NEW.~~

~~Previously the amount of waste had been estimated at 109,110 tons. This was because the wastes are present among other residue and debris in the individual HWMUs, and it is not possible to describe the individual amounts of each coded waste. For this reason, the total estimated in place residue and debris volume of 72,740 cubic yards (CY) was converted to 109,110 tons (assuming 1.5 tons/CY) for input to Amendment #5, Item 10, Line 1, with the statement "included in Line 1" for the remaining waste codes. Thus, it is not to be inferred that there are more than 100,000 tons of ignitable (D001) hazardous waste, nor is it meant to imply that 100 percent of visible residue and debris within the HWMUs is hazardous waste; it is only meant to show that it is estimated that there are more than 100,000 tons of visible residue and debris, and that parts of these materials contain the identified waste codes.~~

~~***HAZARDOUS WASTE PERMIT INFORMATION FORM ITEM 9 – PROCESS***~~

~~The CAMU will contain five impermanent demolition pits for the open burning and open detonation (OB/OD) treatment of waste military munitions (WMM) and bulk explosives. One of the demolition pits will be designated as the primary treatment pit. The other demolition pits will be used one at a time only if there is a need for excess capacity or a functional reason to change pits (e.g., a breach of a berm). When a burn is required, a single burn pan will be placed within a demolition pit. All open burning and open detonation operations will be performed in strict adherence to U.S. Army standard operating procedures or work plans. OB/OD operations will be conducted weekly at the CAMU. Operational procedures for the CAMU appear in Attachment 1 of the Revised Permit (Section 4b of this Revised Class 3 Permit Modification Application (application)).~~

~~Processes identified in Item 8 include the Hazardous Waste Management Unit (HWMU) within the RCRA Interim Status Current OB/OD Area and the CAMU. The HWMU is a disposal landfill unit (D80). Because the Current OB/OD Area is undergoing closure and process design capacities are not applicable, the values provided in Item 8 are estimated volumes of in place debris or residue, based on results of the field investigation program described in the *Final Open*~~

~~*Burning/Open Detonation Area RCRA Interim Status Closure Plan Phase IA Characterization and Assessment of Site Conditions for the Soils/Solid Matrix* (Phase IA Report, included in Attachment H of this Permit Application), submitted to NMED for review on 29 November 1999 (PMC, 1999b).~~

~~It should be noted that not all in-place residue and debris within the HWMUs are hazardous wastes. The exact volumes of individual hazardous wastes contained in the HWMUs are not known.~~

A4.0 HAZARDOUS WASTE PERMIT INFORMATION FORM ITEM ~~10~~ 9 - DESCRIPTION OF HAZARDOUS WASTE

The CAMU will be used to treat (through open burning or open detonation) ignitable (D001) and reactive (D003) hazardous wastes, such as Munitions and Explosives of Concern (MEC), including damaged, defective, expired, and unserviceable munitions. These waste types are generated during remediation activities. Other reactive and ignitable hazardous wastes are also treated that contain metals and organic compounds. Wastes are defined in Attachment 1 of the Revised Permit (Section 4b of this application).

UXO surveys conducted at FWDA over a period of six years have found 13,000 lbs NEW to date at FWDA, as described in Attachment 1 of the Revised Permit. Waste treatment in the CAMU will be at the rate of≤ 1,000 lbs NEW per week , for a maximum annual volume of≤52,000 lbs NEW per year. It should be noted that not all in-place residue and debris within the HWMUs are hazardous wastes. The exact volumes of individual hazardous wastes contained in the HWMUs are not known.

~~EPA Hazardous Waste Numbers listed in Amendment 5 continue to be treated in the applicable processes.~~

A5.0 HAZARDOUS WASTE PERMIT INFORMATION FORM ITEM ~~11~~ 10 - MAP

As part of Amendment 6, Class 3 RCRA Permit Modification Application, a location and site map of the CAMU are included as Figures 1 and 4 (See Section 3 of this application).

A6.0 HAZARDOUS WASTE PERMIT INFORMATION FORM ITEM ~~12~~ 11 - FACILITY DRAWING

As part of Amendment 6, Class 3 RCRA Permit Modification Application, Figures 1, 2, and 3 constitute the figure drawings of the CAMU (See Section 3 of

this application). Figures 4 and 5 illustrate the location of the conditionally exempt igloos.

A7.0 HAZARDOUS WASTE PERMIT INFORMATION FORM ITEM ~~14~~ 13 - COMMENTS

The CAMU will be at SWMU-14 (near the Old Burning Ground and Demolition Landfill Area) and will occupy approximately 3 acres. The CAMU will operate under RCRA Subpart S (40 CFR 264.552) and Subpart X (40 CFR 264.600), and will support the identification, storage, and treatment by open burning and open detonation of WMM. The resulting "safe to recycle" scrap metal or munitions debris will be transported off-site for recycling or disposal in accordance with all local, state, and federal regulations, respectively.

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Prior to treatment at the CAMU, the WMM will be stored in eight earth covered magazines (ECMs or igloos) in Explosive Storage Block B of FWDA.[1] The location of the storage ECMs is shown in Section 3, Figure 4, of this application (Revised Figures and Maps for CAMU) and Attachment 1 of the Revised Permit. The U.S. Army proposes to store the WMM under the Conditional Exemption (CE) provision in the Munitions Rule (62 Federal Register 6621) promulgated by the U.S. Environmental Protection Agency (USEPA) and adopted by the State of New Mexico. All of the qualifying conditions of the CE (e.g., the type of munitions that can be stored, how the munitions are stored, and notification and recordkeeping requirements) will be met, as described in the Standard Operating Procedures contained in Section 5f of this application. The ECMs are not part of the CAMU.

[1] Igloos B-1028, B-1029, and B-1038 through B-1043 have been designated for the storage of WMM in support of the CAMU.

NEW MEXICO
ENVIRONMENT DEPARTMENT

Hazardous Waste Bureau

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BILL RICHARDSON
Governor

DIANE DENISH
Lieutenant Governor

RON CURRY
Secretary

SARAH COTTRELL
Deputy Secretary

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

April 1, 2010

Mark Patterson
Ravenna Army Ammunition Plant
Building 1037
8451 State Route 5
Ravenna, OH 44266

Steve Smith
CESWF-PER-DD
819 Taylor Street, Room 3A12
PO Box 17300
Fort Worth, TX 76102-0300

RE: **NOTICE OF DISAPPROVAL**
CLASS 3 PERMIT MODIFICATION APPLICATION
OB/OD CORRECTIVE ACTION MANAGEMENT UNIT
FORT WINGATE DEPOT ACTIVITY
EPA ID# NM6213820974
FWDA-07-006

Dear Messrs. Patterson and Smith:

The New Mexico Environment Department (NMED) received the Department of the Army's (the Permittee) *RCRA Class 3 Permit Modification Application, OB/OD Corrective Action Management Unit (CAMU),* dated January, 2010 (Permit Modification). NMED has reviewed the revised Permit Modification and hereby issues this Notice of Disapproval (NOD). The Permittee must address the following comments:

COMMENT 1

Part A Application, page 3 of 6, Item 8 (Process Codes and Design Capacities), the Permittee includes a "D80" process code which is identified as a "Landfill" on page 2 of 6. Based on the Resource Conservation and Recovery Act (RCRA) Permit dated 2005, Table 2, the Hazardous Waste Management Unit (HWMU) is not described as a landfill unit. The Permittee must remove this code and replace it with the "X01 (Open Burn/Open Detonation)" process code. The "Amount" for the newly added X01 process code should be listed as zero rather than 72740.0 and

the "Units of Measure" code must be listed as pounds per hour (J) (see Attachment). The Permittee must ensure that the same changes are applied to pages 5 of 6 and A-11. The Permittee must ensure that all other sections of the Part A application are completed appropriately.

COMMENT 2

The Part A Application included in the Permit Modification is dated November 30, 2005, a more recent version of the Part A Application is available and dated November 2009. The Permittee must use the most current Part A application form. Please refer to the following website for the most current Part A Application:
http://www.epa.gov/osw/inforesources/data/form8700/8700-23.pdf

The Permittee must address all comments contained in this letter and submit a revised Part A Application to NMED no later than April 30, 2010. The cover page must indicate that the submittal is a revision and was prepared for NMED.

If you have any questions regarding this letter, please contact Tammy Diaz-Martinez at (505)-476-6056.

Sincerely,

James P. Bearzi
Chief
Hazardous Waste Bureau

cc: Tammy Diaz-Martinez, NMED HWB
Dave Cobrain, NMED HWB
John Kieling, NMED HWB
Laurie King, U.S EPA Region 6
Chuck Hendrickson, U.S. EPA Region 6
Sharlene Begay-Platero, Navajo Nation
Eugenia Quintana, Navajo Nation
Steve Beran, Zuni Pueblo
Edward Wemytewa, Zuni Pueblo
Valerie Lahalla, Zuni Pueblo
Clayton Seoutewa, Southwest Region BIA
Charles Long, Navajo Nation
Rose Duwyenie, Navajo BIA
Judith Wilson, BIA
Eldine Stevens, BIA
Ben Burshia, BIA

File: FWDA 2010 & Reading File
FWDA-07-006

EPA ID Number

OMB#: 2050-0034; Expires 7/31/2012

7. Process Codes and Design Capacities (Continued)

EXAMPLE FOR COMPLETING Item 7 (shown in line number X-1 below): A facility has a storage tank, which can hold 533.788 gallons.

Line Number		A. Process Code (From list above)			B. PROCESS DESIGN CAPACITY (1) Amount (Specify)	B. PROCESS DESIGN CAPACITY (2) Unit of Measure	C. Process Total Number of Units	For Official Use Only
X	1	S	0	2	533.788	G	001	
	1	X	0	1	200.0	J	001	
	2	X	0	1	0.00	J	001	
	3							
	4							
	5							
	6							
	7							
	8							
	9							
1	0							
1	1							
1	2							
1	3							

Note: If you need to list more than 13 process codes, attach an additional sheet(s) with the information in the same format as above. Number the line sequentially, taking into account any lines that will be used for "other" process (i.e., D99, S99, T04, and X99) in Item 8.

8. Other Processes (Follow Instructions from Item 7 for D99, S99, T04, and X99 process codes)

Line Number (Enter #s in sequence with Item 7)		A. Process Code (From list above)			B. PROCESS DESIGN CAPACITY (1) Amount (Specify)	(2) Unit of Measure	C. Process Total Number of Units	For Official Use Only
X	2	T	0	4	100.00	U	001	
0	9							

EPA ID Number | | | | | | | | | | | | |

OMB#: 2050-0034; Expires 7/31/2012

9. Description of Hazardous Wastes *(Continued. Use additional sheet(s) as necessary; number pages as 5a, etc.)*

Line Number		A. EPA Hazardous Waste No. (Enter code)				B. Estimated Annual Qty of Waste	C. Unit of Measure (Enter code)	D. PROCESSES (1) PROCESS CODES (Enter Code)									D. PROCESSES (2) PROCESS DESCRIPTION (If code is not entered in 9.D(1))
	1	D	0	0	1	200.0	J	X	0	1							CAMU
	2	D	0	0	3												
	3	D	0	0	5												
	4	D	0	0	6												
	5	D	0	0	7												
	6	D	0	0	8												
	7	D	0	0	9												
	8	D	0	3	0												
	9																
1	0																
1	1																
1	2																
1	3																
1	4																
1	5																
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3	6																