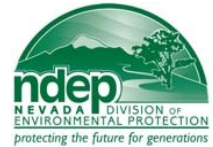




NEVADA DIVISION OF ENVIRONMENTAL PROTECTION
BUREAU OF WASTE MANAGEMENT



FACT SHEET FOR A RCRA HAZARDOUS WASTE PERMIT (RENEWAL)
HAWTHORNE ARMY DEPOT MAIN BASE FACILITY
EPA ID #NV1210090006
DRAFT PERMIT NUMBER NEV HW0023

The Nevada Division of Environmental Protection (NDEP) has developed this FACT SHEET for the Resource Conservation and Recovery Act (RCRA) Permit which NDEP intends to issue Hawthorne Army Depot for the Main Base facility in Mineral County, Nevada. The DRAFT PERMIT is based on the renewal application received by NDEP for the continued operation of this hazardous waste management facility. This FACT SHEET has been prepared in accordance with the public notice requirements of *Nevada Administrative Code (NAC) 444.8632* and *Chapter 40 Code of Federal Regulations (CFR) Section 124.8*. The purpose of this FACT SHEET is to provide interested citizens and other governmental agencies a summary description of the principal facts and significant issues NDEP has considered in reviewing the RCRA Permit Application.

FACILITY DESCRIPTION

The Hawthorne Army Depot (HWAD) Main Base facility is located on 147,236 acres of federal land which has been withdrawn from use just south of Walker Lake in Mineral County, Nevada. The Main Base facility is a government-owned, contractor-operated installation. The agent for the facility is the Department of the Army. Routine facility operation and maintenance are performed by contract operator SOC Nevada LLC. The Main Base facility contains the following hazardous waste management units:

- Four (4) Hazardous Waste Storage Buildings (106-22, 106-23, 115-9, 113-73A);
- Eight (8) "Waste Munition Items" Storage Magazines (116 Group);
- One (1) Rotary Furnace (RF-9);
- One (1) Plasma Ordnance Demilitarization System (PODS) [currently inactive];
- One (1) Bulk Energetic Demilitarization System (BEDS) [currently inactive]; and
- One (1) Open Burning Unit (Old Bomb).

Container Storage

The Draft Permit allows the facility to store containerized hazardous waste in four designated hazardous waste storage buildings, not to exceed a total combined capacity of 3,972 55-gallon drums, or equivalent; and containerized hazardous waste munitions in eight designated storage magazines, not to exceed a total combined capacity of 9,216 55-gallon drums, or equivalent.

Incinerators

The Draft Permit allows the facility to treat certain hazardous waste munitions in the RF-9 incinerator, not to exceed 240 pounds of Net Explosive Weight (NEW) per hour and 500 tons of NEW per calendar year.

The Draft Permit will allow the facility to treat select hazardous waste munitions in the PODS incinerator, when reactivated. Treatment is not to exceed 6,420 tons of NEW per calendar year.

The Draft Permit will allow the facility to begin testing the BEDS incinerator, when reactivated. The operating limits will be determined by performance testing and conducting a Human Health and Ecological Risk Assessment (HHERA).

Subpart X Unit

The Draft Permit allows the facility to open burn hazardous waste propellants at the Old Bomb unit which cannot be processed through the RF-9 incinerator or other waste munition units, recycled or reused. Treatment is not to exceed 20,000 pounds of NEW per day and 2,600,000 pounds of NEW per year.

TYPES OF WASTE TO BE HANDLED

Waste Munitions and other wastes that will be stored and treated at HWAD Main Base originate onsite or, in case of emergencies, from the U.S. Government. Any hazardous waste that cannot be treated onsite must be shipped to an off-site permitted treatment or disposal facility. The facility is authorized to store and/or treat only those waste identified within the permit application. The facility is not authorized to accept chemical or bio-hazardous, radioactive or dioxin-containing wastes.

MONITORING

The Permittee is required to conduct quarterly soil sampling at and around Old Bomb, an open burning unit, as described in Section C of Appendix B (Waste Analysis Plan) of the Permit Renewal Application.

CORRECTIVE ACTION

Due to historical releases of hazardous chemicals at the HWAD Main Base facility, over 25 sites require further investigation and/or remediation activities. Through the Department of Defense Installation Restoration Program (IRP), with oversight from NDEP, HWAD has initiated corrective action investigations and/or cleanup activities at most of these sites. The Draft Permit, which refers to these sites as Solid Waste Management Units (SWMUs) or Areas of Concern (AOCs), contains an enforceable schedule and requirements for future investigation and remedial activities (see Section 12B of the Draft Permit).

BASIS FOR THE PERMIT CONDITIONS

The draft permit conditions are established pursuant to the authority of Section 3006 of the Resource Conservation and Recovery Act (RCRA) (Chapter 40 Code of Federal Regulations as codified in Part 271), 40 CFR Parts 124, and 260 through 270, Nevada Revised Statutes (NRS) 459-520 and Nevada Administrative Code (NAC) 444.842 through 444.8746, 444.940 through 444.9555, and 444.960. These laws and regulations govern the management of hazardous waste in the State of Nevada. NDEP, as the authorized permitting agency for the State of Nevada, has reviewed the permit renewal application submitted by HWAD Main Base and has determined that the facility can be operated under the proposed permit conditions in accordance with applicable regulations and in a manner which is protective of public health and the environment.

Unit-specific operation and maintenance requirements in the draft permit also contain provisions for: waste analysis for proper management of hazardous waste; contingency plan and

preparedness requirements to prevent and respond to releases of hazardous waste; personnel training requirements; inspection and record-keeping requirements; and unit-specific closure requirements. HWAD Main Base is also required to maintain and operate the munitions recycling and reutilization operations at the Western Area Demilitarization Facility (WADF); and to conduct corrective action at solid waste management units (SWMUs) due to past releases of hazardous constituents. HWAD Main Base has already initiated corrective action at these units. Additionally, the Permittee must annually certify that given safety and environmental considerations, open burning at Old Bomb is the most practicable method currently available for the treatment of waste propellants in a manner which minimizes present and future threats to human health and the environment; and that the wastes cannot be treated or recycled using other means.

REQUESTED VARIANCES

When the Plasma Ordnance Demilitarization System (PODS) was first proposed, a variance to Nevada Administrative Code (NAC) 444.8456 1(d) was applied for and initially approved by the State Environmental Commission (SEC) on February 10, 1998. The variance was required prior to construction of the PODS unit because it is located in an area where the water table rises to within 150 feet of the ground surface. Since PODS is currently in temporary closure, the Permittee must apply for and obtain a reissued variance from the SEC prior to reactivating and operating the PODS unit.

PROCEDURES FOR REACHING A FINAL DECISION

Section 7004(b) of RCRA, NAC 444.8632, and 40 CFR Section 124.10 require that the public and interested agencies be given at least forty-five (45) days to comment on each draft Permit prepared under RCRA. The comment period for the HWAD Main Base facility will end on **September 9, 2013**. Anyone wishing to submit comments on this DRAFT PERMIT must do so within this forty-five day period.

Persons should submit written comments concerning the permit conditions to NDEP either at the Carson City address shown below, through email at mgodbout@ndep.nv.gov, or through the website at <http://ndep.nv.gov/admin/public.htm>. Comments should include all reasonably available references, factual grounds, and supporting material.

**Nevada Division of Environmental Protection
Bureau of Waste Management
Attn: Maureen Godbout
901 South Stewart Street, Suite 4001
Carson City, NV 89701-5249**

A public hearing may be held to hear further comments if a written notice of opposition is received and a request for such a hearing is submitted. In the event that a public hearing is requested, a time and place for the meeting will be scheduled and announced in a separate public notice at least thirty (30) days prior to the hearing.

NDEP will respond in writing to all comments received during the public comment period and statements heard at a public hearing, in the event one is held, when making the final decision.

Under the conditions of the DRAFT PERMIT, should it become final and there is no appeal, the facility will be allowed to continue their waste management operations and conduct the required monitoring activities subject to the terms of the RCRA Permit and other applicable permits and/or legal requirements. The facility's hazardous waste management unit and related activities are designed to comply with current state and federal requirements.

The ADMINISTRATIVE RECORD for the DRAFT PERMIT, which includes the APPLICATION, DRAFT PERMIT, and FACT SHEET, are available for public review by appointment between the hours of **8:00 a.m. and 5:00 p.m., Monday through Friday** at the NDEP address above. Further information and copies of the FACT SHEET may be obtained by contacting **Maureen Godbout of NDEP** by phone at **(775) 687-9482**, by email at mgodbout@ndep.nv.gov, or through the website at <http://ndep.nv.gov/admin/public.htm>.

A copy of the DRAFT PERMIT may also be viewed, by appointment Monday through Thursday, at the offices of **SOC Nevada LLC in Hawthorne, NV** or by contacting **Manny Bay, HWAD, Environmental Supervisor at (775) 945-7340**.

When NDEP makes a final decision to either issue or deny the permit, notice will be given to HWAD Main Base and to each person who has submitted written comments or requested a notice of the final decision. In the event that significant comments are received, the final permit decision shall become effective thirty (30) days after service of the notice of decision unless an appeal is filed with the State Environmental Commission (within 10 days after the notice of decision) under *NAC 445B.340*. If no comments are received regarding the draft permit, the final permit shall become effective immediately upon issuance.

Please bring the foregoing notice to the attention of all persons whom you believe would be interested in this matter.