

US EPA ARCHIVE DOCUMENT

Subpart X  
no date

## PROGRAM DESCRIPTION

This narrative has been developed to augment the program description as submitted by the State of New Mexico in seeking authorization for management of the New Mexico Hazardous Waste Management Program.

Through this application, the State Of New Mexico seeks authorization for a revision to its authorized hazardous waste management program. The State received final authorization from the U.S. EPA in January, 1986, and has subsequently submitted two additional requests for revision. Pursuant to 40 CFR, the State is submitting this application to reflect recent revisions and to assure that the authorized state hazardous waste program remains equivalent to the federal hazardous waste program under the Resource Conservation and Recovery Act (RCRA), as amended.

The state is amending its regulations to incorporate the 1988 40CFR as codified 1 July 1989. Additionally, the State has amended its statutes to eliminate the language which prevented the regulation of mixed waste destined for WIPP. With these two changes the State is thus applying for Mixed Waste authorization and Subpart X authorization.

Since the State has been operating a hazardous waste waste program for sometime the mechanisms for implementation and enforcement of a mixed waste program are already established. As are the procedures for permitting and regulating facilities under Subpart X. The State will utilize the procedures for implementation, inspection, enforcement, and permitting as currently exist within the authorized program.

It is estimated that there may be in excess of: 100 medical facilities that may generate mixed waste; 100 facilities within the RCRA universe that may generate mixed waste; and, 275 facilities licensed by the New Mexico Radiation Protection Program that may generate mixed waste. Also, there are nine known facilities that have units to be permitted under Subpart X authority. Within this group of facilities that will require permits are the Waste Isolation Pilot Project, Los Alamos National Laboratory, and Sandia National Laboratory

The State will utilize the current hazardous waste program staff that are trained in RCRA activities to implement the mixed waste and Subpart X requirements. As training courses are made available for mixed waste, staff members will be required to attend. Until such time as the program has established the expertise for mixed waste that expertise is available from within the Division. This expertise to be from staff within the Special Waste Bureau (SWB). Present staff positions within the SWB that can be tapped for assistance are as follows:

**Health Program Manager:** The person within this position is an engineer with years of experience in the area of management of radioactive waste and is trained in the area of health physics.

**Radiation Specialist:** There are two positions within this classification. Personnel in these positions are trained in both health physics and radiation management.

The SWB will provide the technical support necessary to implement all radioactive phases of the mixed waste portion of the hazardous waste program. When permit applications are received they will be shared between SWB and the hazardous waste program to assure adequate technical reviews. SWB will assign an individual to each permit to be responsible for the review of the radioactive portion of the permit.