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17 February 1994

Ms. Barbara Hoditschek
Program Manager
New Mexico Environment Department
525 Camino de los Marquez
Santa Fe, NM 87502

ATTN: Cornelius Amindyas

RE: Part B Permit Application

Dear: Ms. Hoditschek:

In response to Mr. Amindyas' questions by telephone on February 11, 1994, we have prepared the attached answers. If you have any more questions do not hesitate to call.

Very truly yours,

ROY F. WESTON, INC.

Thomas W. Hoskings, Ph.D., P.E.
Project Director

TWH/aa

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OB/OD UNIT PERMIT APPLICATION QUESTIONS
CORNELIUS AMENDYAS
FEBRUARY 11, 1994 - 2:00 PM CST

1. Q. How soon after detonation will people be allowed on the range?
A. There may be a misunderstanding. The range is closed during OB/OD unit operation and even when the range is active the OB/OD unit is in an impact area. Therefore, there is little need for people to go near the unit at any time and never during range activity. If the question is directed at how soon after OB/OD unit operations will EOD personnel go back to the unit to inspect the burn or detonation, it is typically within 24 hours of the burn or detonation.

2. Q. How soon after detonation will people be allowed to collect samples?
A. In order to collect samples the EOD personnel will have to inspect the unit and general area after the burn or detonation and clear it for sampling. We anticipate that sampling can begin, allowing for overall logistics, within one calendar week of burn or detonation if necessary. However, the contaminants of concern are generally not degradable and, if present, will be in the unit and protected from wind dispersion. Therefore, sampling should not be time critical. In fact OB/OD operations are relatively rare (sometimes less than once a quarter), and scheduling sampling based on these operations may cause delays in data acquisition. These items will be addressed in the Sampling and Analysis Plan.

3. Q. Will Ft. Bliss supply a Sampling and Analysis Plan for soil monitoring?
A. Yes. It is included in the preliminary contract statement of work.

4. Q. How will sampling and analysis for ash residues be done?
A. Visible ash residues from OB/OD operations are not expected based on past observations. If they are found during sampling, they will be sampled as soil samples. It is anticipated that soil will by necessity be collected as part of any ash residue samples, but care will be taken to not unduly bias the samples. This issue will be addressed in the Sampling and Analysis Plan.

5. Q. How will screening and standard action levels be established for ash residues?
A. If ash residues are observed and sampled the results of the analyses will be used to establish screening and standard action levels. These will then be proposed to NMED.

6. Q. Why are there only three background samples?
- A. The soils of the area are consistent and uniform. Three samples are expected to be representative.
7. Q. If it rains and a puddle forms in the OD pits or OB trench, what action will be taken?
- A. Proposed actions will depend on the result of the proposed soil sampling. If, for example, the surface and sub-surface soil sampling indicates no contamination, the applicant will have support for a case that destruction is sufficient to warrant no control of direct rainfall. Therefore, appropriate action will be proposed based on the results of the sampling.
8. Q. How will wind speed be determined so that OB/OD operations will not occur when velocity is greater than 15 MPH?
- A. The Army uses a variety of wind speed indicators as part of the usual missile range operations. EOD personnel will consult the operators of wind speed measuring equipment at Davis Dome, or carry portable devices.
9. Q. What is the justification for not doing air monitoring?
- A. The destruction of the explosive and propellant devices is near 100% because they are designed to explode or burn. Unlike other installations that treat explosive contaminated materials, for example, this unit treats only explosive and propellant products. Also, there are no receptors near the unit and it is in a secure, impact area. The nearest public highway is 10 miles to the west. Davis Dome is the closest military occupation and it is 4 miles to the west. The prevailing winds are north-south and potential receptors in these directions are even more distant.