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REPLY TO
ATTENTION OF

DEPARTMENT OF THE ARMY
HEADQUARTERS, U.S. ARMY AIR DEFENSE ARTILLERY CENTER AND FORT BLISS
FORT BLISS, TEXAS 79916-6816



November 10, 1994

Office of the Staff Judge Advocate

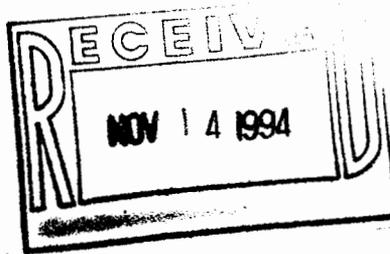
Ms. Barbara Hoditschek
Program Director
New Mexico Environment Department
525 Camino de los Marquez
Santa Fe, NM 87502

Dear Ms. Hoditschek:

Enclosed are the public comments provided by Fort Bliss on the OB/OD part B permit. We look forward to meeting with you and your staff on 21 November 1994 to discuss our proposed changes. If I can be of any further assistance, please contact me at (915) 568-1909.

Sincerely,

Jeffrey T. Walker
Captain, U.S. Army
Environmental Law Attorney



**COMMENTS ON DRAFT PERMIT
OB/OD UNIT, MCGREGOR RANGE, NM
12 October 1994**

REVIEW COMMENTS - Continued

<u>REFERENCE</u>	<u>COMMENTS</u>
GENERAL COMMENTS	Fort Bliss does not dispose of hazardous materials using the open burning (OB) technique. Therefore, remove all reference to OB throughout the permit. Open Detonation (OD) does not fall under the definition of thermal treatment in 40 CFR. Please remove all references to "thermal treatment" throughout the text.
SPECIFIC COMMENTS	
I-6/iv	Records of individuals doing analyses are kept at the laboratory, not the facility.
I-6/E.12	This paragraph should be changed to read the following: "The Permittee may operate the OD Unit on an interim status for 180 days or until the permittee has submitted to the Secretary, by certified mail or hand delivery, a letter signed by the Permittee and a registered professional engineer stating that the OD treatment unit has been professionally constructed or modified in compliance with the Permit; and
I-8/E.15	Change "Permit Conditions E.10 through E.15" to "Permit Conditions E.10 through E.14"
I-10/J.4	Change the text to read "...it is to be understood to be the approximately 500 feet(152.4 meters) by approximately 200 feet (61 meters) generally rectangular portion of the Permittee's facility where explosive ordnance disposal of waste munitions will be conducted, as shown on the Unit Contour Map, Attachment N."
II-1/C (2nd P)	Remove this paragraph and replace with the following: "As discussed in the Waste Analysis Plan, analysis of the waste received will not be conducted prior to detonation because (1) Its reactive nature is known to be hazardous, and suitable for treatment, (2) It would be dangerous to sample the waste PEP, and to delay treatment pending laboratory analysis, and (3) The constituents of the PEP are very well documented, and unknown PEP wastes are not accepted for treatment. Instead, generator supplied information and process knowledge as well as unclassified literature will be used to document the general contents of the PEP prior to OD activities."

**COMMENTS ON DRAFT PERMIT
OB/OD UNIT, MCGREGOR RANGE, NM
12 October 1994**

REVIEW COMMENTS - Continued

<u>REFERENCE</u>	<u>COMMENTS</u>
II-2/D	<p>Delete the entire section and replace with the following language:</p> <p style="padding-left: 40px;">"The Permittee shall comply with the security provisions of HWMR -7, Part V, 264.14 (a) as described below and in permit Attachment B."</p> <p>The active portion of the OD site does not contain any waste, structures, or equipment which could injure unknowing or unauthorized persons or livestock. The OD site consists of a large pit with gradual sloping sides (See Permit Attachment G). No equipment or structures are maintained within the OD site. During non-use periods, the OD site will be left empty and free of all obstacles. During disposal operations of hazardous waste munitions, a thorough examination of the OD site will be made prior to detonation to insure that there are no unauthorized personnel or livestock in the vicinity of the site. The check is also designed to make sure the area is free of vegetation and/or anything else that may cause a fire. Hazardous waste munitions are only brought to the site immediately prior to detonation and are not stored at the site itself. After detonation, the senior EOD technician inspects the site to confirm the destruction of all hazardous waste munitions and to ensure that no fires were started.</p>
II-4/H.7	<p>Delete "all hazardous materials." An inventory of all hazardous materials is not required by 40 CFR 264.73 (a) and to provide such information would be a breach of national security. All munitions stored on Fort Bliss are considered "Hazardous Materials" and are only disclosed on a need to know basis under strict security guidance.</p>
II-5/J	<p>Delete entire paragraph. HWMR -7, Part V, Section 264.70 states that Sections 264.71,264.72, and 264.76 do not apply to owners and operators of on-site facilities that do not receive any hazardous waste from off-site sources. Fort Bliss does not receive hazardous waste munitions from off-site sources, except on an emergency basis.</p>

COMMENTS ON DRAFT PERMIT
OB/OD UNIT, McGREGOR RANGE, NM
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REVIEW COMMENTS - Continued

REFERENCE	COMMENTS
II-5/K.1	Change this paragraph to read as follows: "The Permittee shall maintain a written operating record of OD activities at the Davis Dome facility at the MacGregor Range in accordance with HWMR -7, Part V, 264.75
II-5/L.1	Change "Part 264.111 to Part 264.116 through 264.120. Part 264.110 states that Part 264.111 applies to Hazardous Waste Management Facilities, while Part 264.116 through 264.120 applies to Hazardous Waste Disposal Facilities. The OD site is a Disposal facility.
A-1/-- (middle)	Change this paragraph to read: "1,372 pounds (623 kilograms) of hazardous waste munitions per year or 343 ponds (156 kilograms) per quarter."
A-1/-- (1st para)	Waste Characteristics should read Table A-1 is an "example of"
A-4/-- (parameters)	Change this paragraph to read as follows: "The configuration of the OD treatment unit is such that there is a large containment excavation in which all OD activities are conducted. The EOD team enters the excavation and selects a relatively flat area to place the waste munitions. The waste munitions are packed with an appropriate amount of explosives. The EOD team retreats to a safe distance from the detonation site, then detonates the materials. This process generates a pit from the explosion. There are currently two pits within the OD Unit that are representative of any pits that would be formed as a result of OD operations. If waste residues.....
A-4/-- (Sampling)	Delete "Tom Hoskings (Ph.D., PE)" insert "Fort Bliss Directorate of Environment personnel."
A-5/--	In the first bulleted item replace "each of the OD pits" with "two pits in the OD excavation. In the third bulleted item replace "each pit" with "two pits" In the fourth bulleted item replace "each of the OD pits" with "two of the OD pits".

**COMMENTS ON DRAFT PERMIT
OB/OD UNIT, MCGREGOR RANGE, NM
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REVIEW COMMENTS - Continued

<u>REFERENCE</u>	<u>COMMENTS</u>
A-6/-- (frequency)	Delete "semi-annually and will begin" and "continually semi-annually". This sentence should read: "Initial site characterization sampling will be conducted within six months of permit issuance. Results will be reported 90 days after analysis of the samples have been completed."
A-6/-- (Location)	Change this section to read: "The soil sampling plan will reside with and be updated by: Director of Environment Directorate of Environment USAADACENFB Attn: ATZC-DOE Ft. Bliss, TX 79916-6816
B-1/--	<u>Security Plan</u> The security plan has been revised to more accurately reflect the procedures at the OD Unit. The security plan is included as an appendix to these comments. The revised security plan is to be inserted as Appendix B to the permit.
C-1/title	Change title to read: "PERMIT ATTACHMENT"
C-1/-- (Middle)	Delete the phrase "in the Environmental Management Office" to "by the 41st Ordnance Detachment or the responsible military command."
C-1/-- (Bottom)	Change "will often retreat windward on the" to "will retreat on the."
Table C-1 (Top, Right)	Change "inn" to "in."
D-1/-- (Top)	Change "engaging in such operations." to "engaging in such operation (as described below)." This assures the six month allowance.
E-1/1	Change spelling to "immediately"
E-2/Table	See attached revised table.
E-2/-- (Bottom)	Change "Full" to "Fully."

**TABLE
PAGE E-2**

	<u>TITLE</u>	<u>OFFICE PHONE NO.</u>
Primary	Staff Duty Officer McGregor Range Command	(915) 569-9505/9519
Alternate	Staff Duty Officer Ft. Bliss	(915) 568-1501 evenings and weekends
Alternate	Director, Directorate of Environment	(915) 568-1385/1064

**COMMENTS ON DRAFT PERMIT
OB/OD UNIT, MCGREGOR RANGE, NM
12 October 1994**

REVIEW COMMENTS - Continued

REFERENCE	COMMENTS
F-1/-- (2nd P)	Change "Environmental Management (EM) Office" to "Directorate of Environment (DOE) office"
F-1/--	Add the following as the second paragraph in "Closure Performance Standard" that says "If it is not cost-effective to clean close, a waste in place closure based on risk to human health and the environment will be proposed to the NMED." This is consistent with other references in the permit (e.g., pg K-6 "Soil Monitoring)."
F-2 (Max Waste)	Change the numbers as follows: 3,812 pounds (1,729 kilograms) to 343 lb (156 kg) 15,250 pounds (6,916 kilograms) to 1372 lb (623 kg) 152,500 pounds (69160 kilograms) to 13,720 lb (6230 kg)
F-5 (Top)	Change the second sentence to read as follows: "It is not anticipated that any area within the OD unit will be closed separately"
F-6/-- (2nd P)	Change "four phases" to "three phases."
F-6/-- (Last P)	Change "surrounding areas" to "surrounding areas within the unit."
F-7	Change the following: In bulleted item 1, change "each of the OD pits" to "two pits in the OD excavation." In bulleted item 2, delete OB. In bulleted item 3, change "each pit" to "two pits". In bulleted item 4, Change "each of the OB/OD pits" to "two of the OD pits"
F-10/-- (Middle)	Change "Table F-1" to "Table F-2."
F-11/--	Change "decontaminated liquids" to "decontamination liquids."

**COMMENTS ON DRAFT PERMIT
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REVIEW COMMENTS - Continued

<u>REFERENCE</u>	<u>COMMENTS</u>
F-12 Phase 3	Change point-of-contact to: Director, Directorate of Environment Ft. Bliss, TX 79916 (915) 568-1385/1064
F-13/-- (Top)	Change "approximately natural contours using..." to "approximately natural contours as the available soil stockpiles allow."
F-13/-- (Bottom 2 Ps)	Change " Directorate of Environment and Environmental Management Division" to "Directorate of Environment". Change " The Chief, Environmental Management Office" to The Director, Directorate of Environment"
III-1/B.2	Change "15,250 pounds (6,916 kg) and 152,500 pounds (69,160 kilograms)" to "1,372 pounds (623 kg) and 13,720 pounds (6,230 kg)".
III-1/B.3	Change "3,812 pounds (1,729 kilograms)" to "343 pounds (156 kg)". Delete the term "Open Burn"
III-1/B.4	Delete this section. It is the intent of Subpart X, Miscellaneous Units, section 264.01 (c) to prevent any release that may have an adverse effect on human health or the environment due to the migration of waste constituents in the air and considers several factors listed as subsections (1) through (7). There are no specific requirements for air modeling. Open burning has been removed from the permit as a disposal method. Open Burning is much less efficient than Open Detonation for the disposal of waste PEP materials. Elimination of OB as a disposal method will greatly decrease the material that could be generated as air emissions.

**COMMENTS ON DRAFT PERMIT
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REVIEW COMMENTS - Continued

REFERENCE

COMMENTS

The volume of waste PEP materials to be disposed of at the unit is much less than the volume provided in the original permit application. Review of EOD records indicate that the expected amount of material, including a 20 percent safety factor is 1,372 lbs/year. These are disposed of as discreet incidences, generally at least four times per year, or more often. Therefore individual detonations will involve less than 400 pounds of waste PEP.

The detonation of PEP materials has been shown to be a very effective process for disposal of these materials. The Army Materials Command Handbook "Principles of Explosive Behavior" provides some information of the destructive efficiencies of open detonation for some of the explosives handled at the OD unit. These are provided on Table 1. Data on the open detonation efficiency of most military explosives are either not available in published literature, or are classified. We therefore cannot provide specific information on the generation of contaminants for all PEP agents detonated at the OD Unit. There are data available for the open detonation efficiencies for three of the more common PEP agents: PETN, HMX, and TNT. These can be assumed to be representative of the detonation efficiencies of PEP agents during open detonation.

Table 1 shows the open detonation efficiencies of PETN, HMX, and TNT. Examination of the combustion products identified in Table 1 shows the extremely small mass of product generated for each pound of original explosive material. For example, open detonation of one pound of PETN will generate only 0.0001 pound of ammonia.

Table 1 also clearly shows that of the three PEP agents listed, TNT is the explosive that has the lowest destruction efficiency, and therefore generates the most combustion products. TNT would therefore represent a "worst case" scenario in terms of the mass of contaminants produced per pound of original explosive. This conservative scenario will be used to develop estimates of the contaminants developed as a result of the OD activities.

TABLE 1
Representative Production of Potential Air Contaminants
from PEP Detonation

			Combustion Products								
PEP Item	Formula	Mol. Wt. (lbs/mole)	CO			NH ₃			HCN		
			Mol. Wt. (lbs/mole)	Quantity Produced *		Mol. Wt. (lbs/mole)	Quantity Produced *		Mol. Wt. (lbs/mole)	Quantity Produced *	
				(moles/mole)	(lbs/lb)		(moles/mole)	(lbs/lb)		(moles/mole)	(lbs/lb)
PETN	C(CH ₂ NO ₃) ₄	316.14	28.01	1.59	0.14	17.03	0.002	0.0001	27.03	none	none
HMX	C ₄ H ₈ N ₈ O ₂	200.16	28.01	2.65	0.37	17.03	none	none	27.03	0.0006	0.0001
TNT	(NO ₂) ₃ C ₆ H ₂ CH ₃	227.13	28.01	5.89	0.73	17.03	0.022	0.0016	27.03	0.024	0.0029

* Pollutant production in moles of pollutant per mole of PEP item from AMC pamphlet AMCP 706-180, Engineering Design Handbook, Principles of Explosive Behavior, Headquarters, U.S. Army Materiel Command, April, 1972.

TABLE 2
Emissions from Explosives Detonation⁽¹⁾

Compound	Emission Factor lbs/lb	Emission Rate ⁽²⁾ lbs/yr	ESL ⁽³⁾	Volume ⁽⁴⁾ m3		Emission Factor lbs/lb	Emission Rate ⁽²⁾ lbs/yr	ESL ⁽³⁾	Volume ⁽⁴⁾ m3
Semi-volatiles:					Inorganic gases:				
Naphthalene	2.80E-05	0.0364	440	37,558	NH3	2.90E-04	0.38	170	1,006,812
Benz(a)anthracene	1.60E-07	0.0002	0.5	188,864	HCN	below detect.	na		
Benzo(a)pyrene	3.60E-07	0.0005	0.03	7,082,400	HCl	not tested for	na		
Pyrene	2.20E-07	0.0003	0.5	259,688	NO	1.10E-02	14.3	(5)	
Phenol	9.90E-07	0.0013	154	3,794	Metals:				
Dibenzofuran	2.00E-06	0.0026	775	1,523	Al	not tested for	na		
Diphenylamine	3.10E-07	0.0004	100	1,830	Cr	3.50E-06	0.0046	0.1	20,657,000
Volatile organics:					Fe	not tested for	na		
Benzene	1.10E-04	0.14	30	2,164,067	Ni	2.50E-06	0.0033	0.15	9,836,667
Criteria pollutants:					Cu	not tested for	na		
CO	6.10E-02	79.3	40000	900,055	As	below detect.	na		
NO2	3.60E-03	4.7	100	21,247,200	Pb	2.00E-05	0.0260	1.5	7,869,333
SO2	2.20E-04	0.3	1300	99,880	Cd	2.90E-06	0.0038	0.1	17,115,800
O3	0.00E+00	0.0	235	0	Sb	1.10E-06	0.0014	5	129,844
PM10	1.70E-02	22.1	150	66,889,333	Ba	9.30E-04	1.21	5	109,777,200
Pb	2.00E-05	0.0260	1.5	7,869,333					

- (1) Based on emission factors for explosives detonation developed by the U.S. Army, with the assistance of the U.S. EPA, and published in January 1992. These emission factors were developed using the explosive TNT.
- (2) Estimated annual emission rates are based on the detonation of 1300 pounds of waste per year.
- (3) "Effects Screening Level" (ESL) is a concentration used by the Texas Natural Resource Conservation Commission to evaluate ambient impacts from emission sources. They are based on available toxicological data. The units are micrograms per cubic meter.
- (4) The "Volume" column presents a relative measure of each pollutant's emission rate versus toxicity. The volume reported is the volume of air that the annual emissions of each pollutant would occupy at the ESL concentration, assuming all the emissions of that pollutant are present at one time, and the pollutant is evenly distributed over the volume. The highest "volume" numbers indicate those pollutants with the "worst-case" combinations of high emission rate and low ESL (high toxicity). This table shows that the materials of greatest significance are Inhalable Particulate Matter (dust, PM₁₀) and Barium. The table also indicates that the volatile and semi-volatile organic compounds are not emitted in sufficient amounts to be of concern, relative to general levels of dust and of the metal barium. Barium, which has an ESL of 5 µg/m³, is of relatively low toxicity when compared with other metals such as cadmium and chromium, each of which has an ESL of 0.1 µg/m³.
- (5) There is no ESL for NO, but the material is generally considered to be less toxic than NO₂. For comparison, the OSHA occupational exposure limit for NO is 31,000 µg/m³, whereas for NO₂ only 1,800 µg/m³ is allowable in the workplace.

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REVIEW COMMENTS - Continued

REFERENCE	COMMENTS
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The most detailed information currently available on emissions factors from explosives detonation were developed by the U.S. Army with assistance from the EPA. These emission factors were developed for TNT. The emission factors per pound of explosive are provided in Table 2, Column 2. Ft. Bliss currently disposes of approximately 1,300 pounds of waste PEP agents per year, or approximately 325 pounds per quarter using the open detonation method. Using the emission factors for TNT and assuming the "worst case" scenario that all explosives are TNT, an emission rate of contaminants in pounds per year can be generated. It is obvious from Column 3 of Table 2 that the mass of contaminants are extremely small even if it were assumed that all 1300 pounds of explosives were detonated at the same time, rather than quarterly.

The Effect Screening Level (ESL), column 3, is based on toxicological data and is a concentration used by the Texas Natural Resource Conservation Commission to evaluate ambient impacts from emission sources. The ESL can be used in combination with the emission rate to calculate a relative measure of emission rate versus toxicity. This relative measure is shown in column 4 as Volume. The volume reported is the volume of air that the annual emissions of each pollutant would occupy at the ESL concentration, assuming all the emissions of that pollutant are present at one time, and the pollutant is evenly distributed over the volume. The highest "volume" numbers indicate those pollutants with the "worst-case" combination of high emission rate and high toxicity (low ESL). Table 2 shows that the only materials of significance are Inhalable Particulate Matter(dust,PM10) and Barium. The table also indicates that the volatile and semi-volatile organic compounds are not emitted in sufficient quantity to be of concern.

In conclusion, based on the volume of PEP waste in individual detonations and the effectiveness of this disposal method, only diminimis emissions would occur.

Operations at the OD unit will not adversely impact the air quality of Otero County, nor contribute to the non-attainment areas in El Paso County, Texas. There are no areas of non-attainment in Otero County and no major air emission sources.

**COMMENTS ON DRAFT PERMIT
OB/OD UNIT, McGREGOR RANGE, NM
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REVIEW COMMENTS - Continued

<u>REFERENCE</u>	<u>COMMENTS</u>
	<p>There are no human receptors in the immediate vicinity of the OD unit. The nearest permanently occupied facility is at Davis Dome, approximately 4 miles west of the OD unit. As stated in the Security Plan, the unit is within an active live firing range and access by humans, livestock, and other potential environmental receptors is strictly controlled.</p>
III-2/C	Delete this section, open burning will not be conducted at the OD Unit.
III-2, III-3/D.1	<p>Delete "with provisions for a cover for a pit that may result from continual OB/OD operations during the permitted life of the OB/OD unit." A cover is not practical or necessary because:</p> <ul style="list-style-type: none">- Future operations will require that on-ground detonation be conducted at various locations within the treatment unit.- Pits resulting from future detonations will be of varied sizes making covers impractical.- Covers on existing pits will be destroyed by new detonations.- Run-on to the unit is precluded, and direct precipitation to a pit will largely be consumed by evaporation.- The use of pit covers are unknown to the applicant as containment devices for detonation sites.- Containment construction should not be required unless the proposed soil sampling indicates that there is a threat to human health or the environment.- The area in which the OD unit is located is remote and the surrounding area is already infested with ammunition and target fragments from the live firing range.

**COMMENTS ON DRAFT PERMIT
OB/OD UNIT, MCGREGOR RANGE, NM
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REVIEW COMMENTS - Continued

<u>REFERENCE</u>	<u>COMMENTS</u>
III-3/D.9	<p>Delete this requirement.</p> <ul style="list-style-type: none">- There is no indication that groundwater quality is threatened.- It is impractical to reschedule range operations for inspection and potential removal of water in this remote location within 24 hours.- It is impractical to monitor when a rainfall event ends in order to establish the start of a 24-hour period.- Evaporation is so great (exceeding precipitation by eight times) as to make any standing water due to direct precipitation very short lived.
III-4/D.10	<p>Delete this entire paragraph. Fort Bliss has made a successful demonstration (see page II-2/D) under paragraphs 264.14 (a) (1) and (2) and thus paragraph 264.14 (c) does not apply.</p>
III-4/F	<p>Risk assessment...this section is unclear to the applicant. Applicant will calculate action levels for soil based on PRG Guidelines and site specific considerations. The screening action levels are determined based on chemical constituents and are independent of soil concentrations.</p> <p>Since the primary pathways of concern are most likely inhalation of dust and ingestion of soil, and since no one will be exposed to soils at depths greater than 5 feet, should the last sentence read: "whenever contamination is determined above a depth of 5 feet....".</p>
III-5/J.1, J.2, J.3	<p>Permittee has demonstrated in a previous comment (III-I/B.4) that air modeling is not necessary for this unit.</p>
III-5/J.5	<p>Delete this section. Semi-annual soil sampling is not proposed, and is not necessary. Also, OB/OD operations are not semi-annual.</p>
III-5/J.6	<p>Delete this section. Semi-annual sampling is not necessary.</p>
G-1/-- (3rd P)	<p>Delete "being treated in her two year tenure."</p>

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REVIEW COMMENTS - Continued

<u>REFERENCE</u>	<u>COMMENTS</u>
G-1/-- (Last P)	Last line, last sentence should be deleted.
G-2/-- (Last P)	Change description to read: Within this excavation are several pits which are the result of OD operations. The representative dimensions of two pits are...." (WESTON)
H-1/-- (2nd Para.)	Change "The grounds near the OB/OD unit are cleared of weeds and brush..." to "The grounds near the OD unit are generally clear of weeds and brush...." Completely clearing weeds is impractical and not required by any regulations.
H-1/-- (4th P)	Last sentence should be changed to "The EOD specialists retreat on the access road to at least the distances prescribed on Table H-1."
H-2/-- (Last P)	This sentence should read "12 pieces of major equipment including:"
H-3/-- (Bottom)	Are phone numbers current?
I-1/-- (Last P)	Change 3,812 pounds (1,720 kg) to 343 pounds (156 kg).
I-2/--	Delete "very well maintained" and "but well cleared." These terms can not be quantified.
I-3/-- (Middle)	Change 3,812 pounds (1,720 kg) to 343 pounds (156 kg).
I-7/--	Delete top half of page "Open Burning", since open burning will not be done at this unit.
I-7/-- (Bottom)	Delete "bottom of the conical" from the second sentence.
I-10/M and N	These details are inappropriate for a permit. "Bothered" can not be quantified.
I-18/-- (Bottom)	"At the end of each quarter...", should read "within 6 months of issuance of the permit and at closure."
I-18/-- (Entire)	This page is duplicated in the draft permit.

**COMMENTS ON DRAFT PERMIT
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REVIEW COMMENTS - Continued

<u>REFERENCE</u>	<u>COMMENTS</u>
J-1/-- 1st Paragraph	Last sentence should read "then the unit will be closed and post-closure groundwater monitoring may be required if indicated by a risk assessment."
J-7/-- (Last Line)	Delete.
J-12/-- (Bottom P)	Delete the sentence that begins "It is anticipated..." There is no need for this schedule with characterization and closure sampling.
J-14/-- (middle)	Change the following: Bulleted item one, change this to read "at the bottom of two pits in the OD area" Bulleted item three, change this to read:"from the sides of two pits" Bulleted item four, change this to read:"around the perimeter of two pits in the OD area"
J-14/-- (Next to Last P)	Delete "over a two year period."
J-15/--	Figure J-4 has been changed to more accurately reflect the current conditions at the OD Unit.
J-16/-- (3rd P)	Delete "semi-annually."
J-16/-- (Bottom)	Delete paragraph headed "Open Burn:" since open burning will not be done at this unit.
J-19/-- (Top)	Change this paragraph to read the same as the first paragraph, page A-4 Section "Parameters and Rationale.
Figure J-5	A footnote has been added.
J-26/-- (duplicates)	Delete 20 percent, duplicates will be collected based on the information provided in Table F-2, pg F-10.

**COMMENTS ON DRAFT PERMIT
OB/OD UNIT, MCGREGOR RANGE, NM
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REVIEW COMMENTS - Continued

<u>REFERENCE</u>	<u>COMMENTS</u>
K-1/-- (Middle P)	Second sentence should read "If significant (pg. K-7) levels above background are reported, a risk assessment as described in Sec. F. pg III-4 will be initiated to determine if air sampling is required." Delete reference to air modeling because the destruction rate will stay the same rather than double.
K-1/-- (Justification)	This justification is valid, but many aspects of the permit do not conform to it.
K-2/-- (effectiveness)	Delete "OB trench and OD pits". Delete the rest of the paragraph beginning with the sentence beginning "OB/OD treatment....."
K-2/-- (Bottom)	The "lapse" conditions requirements are unnecessary given the infrequency of treatment, lack of receptors, etc. etc.
K-6/-- (middle)	Change this sentence to read: "...soil samples will be taken from two representative pits within the OD area, the floor of the treatment unit, and...."

PERMIT ATTACHMENT B

SECURITY PLAN

The OD treatment unit is located within a live firing range and impact area on McGregor Range (Map 1/Exhibit 1, Permit Attachment N). Access to the range is strictly controlled by range personnel. The entire impact area is surrounded by a four foot high, 3-strand barbed wire fence and has numerous warning signs posted throughout the impact area to include the OD site. These signs are printed in both English and Spanish to read as follows: "DANGER, NO UNAUTHORIZED PERSONNEL, KEEP OUT", and "PELIGRO, NO PERMITIDA LA ENTRADA SIN AUTHORIZACION".

Physical access controls to the OD site are the site's remoteness, its location within a heavily duded impact area, and security patrols conducted on a 24 hour, seven-day-a-week schedule. The immediate vicinity surrounding the OD site is a heavily duded impact area which is infested with both exploded and unexploded ammunition rounds and warheads. The impact area provides an effective barrier and control mechanism to deter trespassing. The security plan includes visual inspections of the range by security personnel which are supplemented with helicopter flyovers, usually two per day. The military reservation boundary and the lack of public roads make the potential access for hikers and 4-wheel drive vehicles is very difficult. This is by design and is a requirement for the firing ranges.

Illegal immigrants moving north from Mexico do not pose a security threat as they would have to cross approximately 40 miles of desert, to include 5 miles of heavily duded impact area, to reach the OD site. If they did reach the OD site, the security patrol could easily spot them and arrest them. If that failed, there is no reason for illegal immigrants to stop at the OD site (i.e. no water, shade, or other comforts). Any illegal immigrants who enter the active portion of the OD site during the disposal of hazardous waste munitions would be detected by the disposal ordnance team and escorted off the premises. During non-use periods, the OD site contains no material or objects that pose a threat to human life or livestock.