



DEPARTMENT OF THE ARMY
HEADQUARTERS, U. S. ARMY AIR DEFENSE ARTILLERY CENTER AND FORT BLISS
1733 PLEASANTON ROAD
FORT BLISS, TEXAS 79916-6816

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ENTERED

January 14, 1998

REPLY TO
ATTENTION OF:

Directorate of Environment

RCRA Permits Program Manager
Hazardous & Radioactive Materials Bureau
New Mexico Environmental Department
2044 Galisteo Street
Santa Fe, New Mexico 87502

RE: Request Language for Class II Permit Modification
US Army Air Defense Artillery Center and Fort Bliss
Fort Bliss Open Detonation Operational Permit
EPA ID No. NM 4213720101-01

Dear Program Manager:

The Fort Bliss Directorate of Environment revised the appropriate portions of the Operational Permit to reflect modification items that Fort Bliss requested and your office verbally approved. These requests were supplied by letter dated 30 January 1997, discussed in a meeting at your office on 19 November 1997, and finalized through telephone conversations with Mr. Stephen Pullen of your office. The specific modification items addressed in the Permit include:

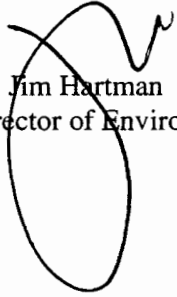
- a. Deletion of the deep soil boring requirements for the compliance sampling.
- b. Reduction in the sampling requirements for the eastern portion of the Unit.
- c. Provisions for annual instead of semi-annual monitoring based on treatment volumes.
- d. Clarification of the 24-hour requirement for inspection and sampling to be performed as soon as practical after an Open Detonation (OD) event.
- e. Deletion of free liquids, ignitability, pH, and PCBs from the compliance monitoring analytical requirements.
- f. Reclassification of background sampling locations to outer monitoring points.

Please note that a provision for an expanded sampling event every five years has been added to the permit language and will include many of the modified items listed above. This expanded sampling event will provide a comprehensive update of the OD Unit that is in addition to the normal annual or semi-annual compliance monitoring.

The revisions have been made to Permit Module III, Permit Attachment A, Permit Attachment F, and Permit Attachment J, and are enclosed with this letter. Additions are shown as underlined text, and omissions are shown as a strikeout for ease of review by your staff.

Your consideration of this request is appreciated and additional justification and/or information can be supplied upon request. Please do not hesitate to call Mr. Ismael Delgado of the Fort Bliss Directorate of Environment at (915) 568-6993 if you have any questions or need additional information.

Sincerely,


Dr. Jim Hartman
Director of Environment

Enclosure

Copies Furnished:

Stephen Pullen - NMED
LTC Jack Frost, CDR 1st CAS BN