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ENTERED



MARK E. WEIDLER
SECRETARY

EDGAR T. THORNTON, III
DEPUTY SECRETARY

June 8, 1998

Dear Concerned Citizen:

The New Mexico Environment Department (NMED) intends to approve a Fort Bliss (FB) proposed modification to its Hazardous Waste Operating Permit. Enclosed are a Fact Sheet and Legal Notice regarding the proposed modification and NMED's position. The NMED offers this material so that the public might have an opportunity to comment on NMED's intention to approve to proposal.

Complete copies of the current operating permit and the proposed modifications and associated correspondence are available at both NMED and FB at the following addresses:

NMED Hazardous and Radioactive Materials Bureau
2044 Galisteo Street
Santa Fe, New Mexico 87505

Fort Bliss Directorate of Environment (DOE)
Building 515B, Pleasonton Road
Fort Bliss, Texas 79916-6812
(contact Mr. Ismael Delgado at (915) 568-6993)

Comments regarding this issue must be in writing and received by NMED at the above address no later than 5:00 pm, Friday, July 10, 1998.

If you have and questions regarding the proposed modification, please contact Mr. Stephen Pullen of wy staff at (505) 827-1558.

Sincerely,

Robert S. (Stu) Dinwiddie, Ph.D., Manager
RCRA Permits Management Program

enclosures: Legal Notice
 Fact Sheet

LEGAL NOTICE #98-03

NEW MEXICO ENVIRONMENT DEPARTMENT
HAZARDOUS AND RADIOACTIVE MATERIALS BUREAU
RCRA PERMITS MANAGEMENT PROGRAM
Santa Fe, New Mexico

June 9, 1998

**NOTICE OF INTENT TO APPROVE A PERMIT MODIFICATION FOR THE FORT
BLISS, MCGREGOR RANGE OPEN DETONATION UNIT**

The State of New Mexico is authorized to operate a hazardous waste management program in lieu of the federal program for the Resource Conservation and Recovery Act (RCRA). Under authority of the New Mexico Hazardous Waste Act NMAC § 1978 74-4-1 et. seq. (Repl. Pamp. 1993) as amended 1989, and by the New Mexico Hazardous Waste Management Regulation (20 NMAC 4.1, effective November 30, 1995), the New Mexico Environment Department (NMED) can approve or deny proposed permit modifications. The NMED has received a Operating Permit modification request from the U.S. Army Air Defense Artillery Center and Fort Bliss (USAADACFB), EPA identification number NM4213720101-01, for an Open Detonation Unit and intends to approve the request.

Any person who wishes to comment upon NMED's intent to approve the modification request, or wishes to request a public hearing regarding this issue, should submit written comments or a request, along with the commentor's name, address and telephone number to the following Santa Fe address. Request for a public hearing shall clearly state the nature of the issues proposed to be raised in the hearing. Only comments and/or requests received before 5:00 pm, Friday, July 10, 1998 will be considered. The NMED will provide thirty (30) day notice of public hearing if one is scheduled.

The Administrative Record for this proposed permit modification consists of the proposed modification, a fact sheet and related correspondence. These documents and correspondence may be viewed at the following locations:

NMED Hazardous and Radioactive Materials Bureau
2044 Galisteo Street
Santa Fe, New Mexico 87505

(Mondays through Fridays from 8:00 am to 5:00 pm, Contact person - Mr. Stephen Pullen)

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Fort Bliss Directorate of Environment (DOE)
Building 515B, Pleasonton Road
Fort Bliss, Texas 79916-6812

(During normal business hours, Contact person - Mr. Ismael Delgado)

To obtain a copy of the proposed modification, or any part thereof, at 35 cents per page, contact Mr. Stephen Pullen at the above Santa Fe address or telephone (505) 827-1558.

The NMED must ensure that a permit modification request is consistent with the appropriate portions of the New Mexico Hazardous Waste Management Regulations. After consideration of all written public comments received, the NMED will notify FB and any person submitting written comments during the prescribed comment period of NMED's final decision.

FACT SHEET

June 8, 1998

Subject: NMED's intent to approve Fort Bliss's request to modify the McGregor Range Open Detonation (OD) Resource Conservation and Recovery Act (RCRA) Operating Permit

Facility Name: U.S. Army Air Defense Artillery Center and Fort Bliss

EPA ID Number: NM 4213720101-01

Modification

Request: Principally to reduce compliance monitoring requirements.

Specifically: the deletion of the deep soil boring requirements for compliance sampling; reduction in sampling requirements for the eastern portion of the Unit; provisions for annual instead of semi-annual monitoring based on treatment volumes; clarification of the 24-hour requirement for inspection and sampling to be performed after an OD event; deletion of the analytical requirement for free liquids, ignitability, pH, and PCBs; and reclassification of background sampling locations to outer monitoring points.

Modifications are proposed to occurred to the following portions of the Operating Permit: Module II (General Facility Requirements), Attachment A (Waste Analysis Plan); Attachment F (Closure Plan); Module III (Treatment of Energetic Wastes), Attachment J (Sampling and Analysis Plan). A complete compilation of all added and deleted language is attached.

The request is considered a lessening of permit requirements and therefore the New Mexico Hazardous Waste Management Regulations (20 NMAC 4.1) require considerable opportunity for public comment.

In addition to the changes to the OD Unit Operating Permit, HRMB is proposing to unilaterally add two sites to the HSWA Module; the McGregor Range Fire Training Area and the McGregor Range Former Drum Storage Area.

Type of
Permitted Unit
and Activity:

The Open Detonation Unit thermally treats pyrotechnics, explosives, and propellant (PEP) that result from the demilitarization of existing stockpiles and off-specification material. The OD Treatment Unit is a manmade excavation approximately 500 ft in diameter and 20 ft deep.

The permittee is required to construct, maintain and operate the OD treatment unit to minimize the possibility of a fire, explosion, or any unplanned, sudden or non-sudden release of hazardous waste to air, soil, or surface water which could threaten human health or the environment.

Type and
Quantity of
Wastes:

The Permittee is allowed to open detonate only those wastes listed in Permit Attachment N and is allowed to open detonate no more than 2,500 pounds of waste munitions per quarter.

Background
Information:

The New Mexico Environment Department (NMED) issued a Hazardous Waste Facility Operating Permit to Fort Bliss in June of 1995 after operating as an OD unit since 1965. The Operating Permit was modified in September, 1995 to provide a more safe approach to determining whether a potentially reactive soil sample could undergo analysis. The Operating Permit was again modified in May 1996 to allow an increase in the amount of wastes that could be treated annually from 1373 to 10,000 pounds net explosive weight.

Document and
Associated
Correspondence

Availability: Copies of the proposed permit modification and associated correspondence are available for public review weekdays between 8 am and 5 pm at the following locations:

NMED Hazardous and Radioactive Materials Bureau
2044-A Galisteo Street
Santa Fe, NM 87505

Fort Bliss Directorate of Environment (DOE)
Building 515B, Pleasonton Road
Fort Bliss, Texas 79916-6812
(contact Mr. Ismael Gelgado at (915) 568-6993)

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Comment Period
and Request for
Public

Hearing: Any person who wants to comment on the proposed decision to approve the permit modification, or who wants to request a public hearing, may do so by submitting written comments or a request to the above NMED address, attention: Mr. Stephen Pullen. Any request for hearing shall state the nature of the issues proposed to be raised in the hearing and must include the requestor's name and address. **Only comments and/or requests received by 5:00 pm July 10, 1998 will be considered.** For further information please call Mr. Stephen Pullen at (505) 827-1558.

Final Decision:

NMED will consider all comments submitted on this issue before formulation of a final decision. NMED will notify FB and each person who submits a written comment during the prescribed period of the final decision or any scheduled public hearing. The final decision will require that activities at the OD Unit be conducted in accordance with the applicable State and Federal laws and FB's operating permit.

Attachment 1

Permit Modifications (additions are underlined and deletions are struck out)

Attachment A

1. - Physical and Chemical Characteristics of Wastes and Residues, 2nd paragraph, 2nd sentence, "These include initial site characterization sampling (and associated compliance sampling) and closure sampling."
2. - WASTE ANALYSIS PLAN, 1st paragraph, 1st sentence, "Tables A-2 through A-6 provide a list of PEP formulations ~~that will~~ for materials that may be thermally treated at the OD treatment unit."
3. - WASTE ANALYSIS PLAN, 2nd paragraph, "Documentation of the amount and type of PEP waste treated in the past two years is maintained by the 41st Explosive Ordinance Detachment (EOD) OD unit at Fort Bliss (i.e., USAADACENFB)."
4. - Parameters and Rationale [HWMR-7, Part V, §264 13(b)(1)], 1st paragraph, "The OD activities have over the past several years and currently are conducted in the western portion of the unit. As such, several blastpits are located in this area. There are currently two pits within the OD unit that are representative of any pits that would be formed as a result of the OD operations. If waste residues (ash) are found in these areas they will be tested for RCRA hazardous waste characteristics (ignitability, reactivity, corrosivity, and metals toxicity). ~~The residues will be subjected to the reactivity tests (Gap Test and Deflagration/Detonation Transition Test) to determine if hazardous quantities of the hazardous material remain.~~ Prior to testing, the 41st EOD will evaluate and determine whether it is safe to sample the residues. The residues will also be tested for explosive residues using an EPA approved Method SW846 8330. These tests will serve as a measure of the effectiveness of thermal treatment for this waste."
5. - Parameters and Rationale, 2nd paragraph, "The RCRA toxicity characteristics tests for metals will also be performed on the residues. ~~be done on the ash after negative results are obtained from the reactivity tests.~~"
6. - Sampling Methods, 1st paragraph, 2nd sentence, "The UXO sweep will be done by a 41st ~~Explosive~~ EOD specialist using

established procedures."

7. - Sampling Methods, insert 3rd paragraph, "Regrading was performed in late 1995 where the blast pits were smoothed to eliminate safety hazards for the EOD personnel. As such, blast pits are not present in the eastern portion of the Unit. Soil samples during the compliance events will be collected from the new blast pit in the western portion of the Unit and from random locations in the eastern portion of the Unit for coverage. The sampling plan for the compliance events is summarized below."

8. - Sampling Methods, 4th paragraph, "Soil samples will be collected from the most recent blast pit from a depth between 1 inch 6 inches (2.5 15.2cm) and 6 inches 1 foot (15.2 cm 0.3m) at the following locations:
 - 1 discreet sample at the bottom of ~~each of the two~~ OD pits in the excavation,
 - 3 discreet samples from the sides of ~~each of the two~~ OD pits (~~3 total~~), and,
 - 4 discreet samples around the perimeter of ~~each of the~~ OD pits (outside of the pits) to evaluate the effect of kickout. (~~8 total~~), and
~~· 3 discreet background samples (in a triangular form) from an area of the OD treatment unit (at least 50-100 feet away) that has not been impacted by operation of the OD."~~

9. - Sampling Methods, 5th paragraph, "Soil samples will be collected from a depth of surface to 6 inches (15.2cm), and 6 inches (15.2cm) ~~and~~ to 1 foot (0.3m) at the following locations:
 - 8 discreet random samples in the bottom of the OD treatment unit (but not in the pits). This is surface material from the flat excavation area that consists of the bottom of the unit, surrounds the pits of interest. Some of these locations are in the eastern (unused) portion of the unit to provide coverage for updating the conditions.
 - 8 discreet random samples from the perimeter (outside of the treatment OD unit).

· 2 discreet samples approximately 200 feet west of the perimeter.

· 3 discreet samples approximately 700 feet from the center of the Unit which will serve as outer monitoring points."

10. - ~~Sampling Methods, 6th paragraph, "In addition, soil samples will be taken in 5 feet (1.5m) intervals from a 50 feet (15.2m) boring place approximately in the middle of the OD treatment unit. This will produce 10 samples."~~
11. - ~~Sampling Methods, 7th paragraph, "All samples will be examined the physical evidence of UXO of burned materials. The samples will then be subjected to the reactivity tests (Cap Test and Deflagration/detonation Transition Test). Upon Completion of these tests, each individual soil sample will be placed into a clean mixing bowl, mixed thoroughly and placed into its appropriate sample container."~~
12. - ~~Frequency of Analysis, 1st paragraph, "Initial site characterization sampling will be conducted ~~semiannually and will begin~~ within 6 months of permit issuance. Biannual sampling will be performed for 2 years following the initial characterization. If the volume of materials treated at the OD Unit does not exceed 5,000 pounds (2,270 kilograms) in subsequent years, sampling will change from biannual to annual. Annual sampling will occur in August, and biannual sampling, if required, will be performed in August and February. The analysis results will be reported to HRMB following each ~~second and fourth~~ quarterly sampling and analysis event."~~
13. - ~~Frequency of Analysis, 2nd paragraph, "An expanded sampling event will occur every five years as described in Permit Attachment J."~~

Attachment F

14. - ~~Activity Table, 2nd paragraph, "The 41st EOD conducts explosive demolitions at the OD treatment unit approximately 2 to 3 times per quarter. Explosives are blown with C-4 in existing demolition pits, which are visually inspected following each blow."~~
15. - ~~Site Sampling, 3rd paragraph, "Soil samples from the most recent blast pit will be collected from a depth between 1 &~~

in. (2.5 ~~15.2~~cm) and 6 in. 1-ft. (15.2cm 0.3m) at the following locations:

- 1 discreet sample at the bottom of ~~each of the two~~ pits in the OD excavation,
- 3 discreet samples from the sides of ~~each of the two~~ pits in the OD excavation, (3 ~~6~~ total),
- 4 discreet samples around the perimeter of the ~~two~~ OD pits (outside of the pits) to evaluate the effect of kickout (4 ~~8~~ total),
- 3 discreet ~~background~~ samples from an area of the site (approximately 700 feet from the center of the Unit) that has not been impacted by operation of the OD unit to serve as outer monitoring points."

16. - Site Sampling, 6th paragraph, 2nd sentence, "~~The samples will then be subjected to the reactivity tests (Gap Test and Deflagration/Detonation Transition Test).~~"

17. - Table F-1, Inorganics

Analyze	Analytical Method	Sample Volume
Reactivity	GAP Test Appendix III	10g
Reactivity	Deflagration/Detonation Test - Appendix III	20g

18. - Table F-1, Organics

Analyze	Analytical Method	Sample Volume
Nitroglycerine	SW846 83320M	100-500g

Attachment J

19. - SITE CHARACTERISTICS, 2nd sentence, "After characterization presenting a description of the OD unit, the Sampling and Analysis Plan will be described."

20. - Land Use and Surface Water, 3rd Paragraph, 4th sentence, "Runon is will be diverted from the unit by berms (to be built)."

21. - Regional Hydrology, 5th paragraph, 7th sentence, "Several soil borings have been completed to a depth of 50- feet within the OD Unit and none have encountered groundwater."

22. - Sampling Methods, 2nd paragraph, 5th sentence, "Sampling will be performed as soon as practical after an OD event if it occurs immediately before or during the required sampling"

months (see Frequency of Analysis, page 19)."

23. - Sampling Methods, 4th paragraph, 1st sentence, "Sampling personnel will record the location of each sample with respect to permanent stations (primarily fence posts and wooden stakes), the date, names of sampling personnel, and other pertinent information."
24. - Sampling Methods, 5th paragraph, "Regrading was performed in late 1995 where the blast pits were smoothed to eliminate safety hazards for the EOD personnel. As such, blast pits are not in the eastern portion of the Unit. Soil samples during the compliance events will be collected from the new blast pit in the western portion of the Unit and from random locations in the eastern portion of the Unit for coverage. The sampling plan for the compliance events is summarized below."
25. - Sampling Methods, 6th paragraph, "Discreet soil samples will be collected from a depth between 1 inch ~~6 inches~~ (2.5 ~~15.2~~cm) and 6 inches ~~1 foot~~ (15.2cm ~~0.3m~~) from the most recent blast pit, which is at the following locations which are shown on the schematic diagram, Figure J-4:
 - 1 discreet sample at the bottom of ~~each of the two~~ OD pits,
 - 3 discreet samples from the sides of ~~each~~ the pit (3 total), and
 - 4 discreet samples around the perimeter of ~~each of the~~ OD pits (outside of the pits) to evaluate the effect of kichout (4 & total). and
 - ~~·3 discreet background samples from an area of the site that has not been impacted by operation of the EOD."~~
26. - Sample Methods, 7th paragraph, "Soil samples will also be collected from a depth of surface to 6 inches (15.2cm), and 6 inches (15.2cm) to 1 foot (0.3 m) at the following locations:
 - 8 discreet random samples in the bottom of the treatment unit (but not in the pits).
 - 8 discreet random samples from the perimeter (outside of the treatment unit).
 - 2 discreet samples approximately 200 feet west of the perimeter.
 - 3 discreet samples approximately 700 feet from the

center of the Unit which will serve as outer monitoring points."

27. - ~~Sample Methods, 8th paragraph, "In addition, soil samples will be taken at 5 foot intervals from a 50 feet (15.2 m) boring placed approximately in the middle of the treatment unit. The analytical results will be evaluated to determine whether drilling to a depth greater than 50 feet is necessary."~~
28. - ~~Sample Methods, 9th paragraph, "All samples will be examined for physical evidence of UXO. The samples will then be subjected to the reactivity tests (Gap Test and Deflagration/Detonation Transition Test). Upon completion of these tests, Each discreet soil sample will be placed into a cleaned mixing bowl, mixed thoroughly (to homogenize the sample) and then placed into its appropriate sample container."~~
29. - ~~Sample Methods, 12th paragraph, "An expanded sampling event will occur every five (5) years where additional sampling of the eastern portion of the unit bottom (similar to the blast pit related sampling described above) and completion and sampling of an approximate 50-foot soil boring within the unit will occur. The expanded sampling will include an additional six (6) sampling locations in the eastern portion of the Unit, and collection of ten (10) sampled at approximate five feet intervals from the 50-foot soil boring."~~
30. - ~~Frequency of Analysis, "Initial site characterization sampling will conducted semiannually and will begin within 6 months of permit issuance. Biannual sampling will be performed for 2 years following the initial characterization. If the volume of the materials treated at the OD Unit does not exceed 5,000 pounds (2,270 kilograms) in subsequent years, sampling will change from biannual to annual. Annual sampling will occur in August, and biannual sampling, if required, will be performed in August and February. The analysis results will be reported to HRMB following each second and fourth quarterly sampling and analysis event. Initial unit characterization and subsequent sampling will be conducted semiannually. Results will be reported to NMED after each sapling event."~~
31. - ~~Soil Sample Analysis, 1st paragraph, 2nd sentence, "Dioxins analysis (EPA Method 8280) will be performed on approximately 10% of the collected samples, and in particular those identified with detectable levels of explosives during the previous sampling event."~~
32. - ~~Soil Sample Analysis, 2nd paragraph, "All soil samples~~

collected during the expanded sampling event will be submitted for the parameters listed in table J-3 in addition to the following:

• <u>Free Liquids</u>	<u>EPA Method SW846 9095</u>
• <u>Ignitability</u>	<u>EPA Method SW846 1010</u>
• <u>pH</u>	<u>EPA Method SW846 90940</u>
• <u>PCBs</u>	<u>EPA Method SW846 8080"</u>

33. - Soil Sample Analysis, 3rd paragraph, "Note that PCB analyses will be performed as 10% of the total number of samples similar to the Dioxin analysis requirements."

34. - Table J-3,

ANALYZE	ANALYTICAL METHOD	SAMPLE VOLUME	PQL
INORGANICS			
Free Liquids	SW846 9095	100 g	NA
Ignitability	SW846 1010	10 g	NA
pH	SW846 9040	10 g	0.1 SU
Reactivity	GAP Test - Appd. III	10 g	NA
Reactivity	Detonation/Deflagration	20 g	NA

35. - RESIDUE ANALYSIS PLAN, Parameters and Rationale, 1st paragraph, "The configuration of the OD treatment unit is such that there is a large containment excavation that contains two pits. The pits are used for detonation. If waste residues (ash) are found in or approximate to the OD treatment unit, these areas they will be tested for RCRA hazardous waste characteristics (ignitability, reactivity, corrosivity, and metals toxicity). The residue will be subjected to the reactivity test (GAP Test and Deflagration/Detonation Transition Test) to determine if hazardous quantities of the PEP material remain."

36. - Procedures for Completion of Boring and Subsurface Sampling, 1st paragraph, 1st sentence, "A single soil boring will be installed in the unit every five (5) years."

Module III

- RISK ASSESSMENT, "If required, the The Permittee shall conduct a Risk Screening Assessment using either the EPA, Region VI, Media Specific Cleanup Levels and/or a Risk Assessment using the Risk Assessment Guidance for Superfund (RAGS, July 1989) in consultation with NMED. EPA Region 3 Guidelines or the Permittee may calculate the action levels using EPA Subpart S risk-based guidelines."

- SAMPLING AND ANALYSIS FOR AIR AND SOIL MONITORING, I.1, 2nd paragraph, "In addition to the hazardous constituents listed in

Table A-8, Permit Attachment A, the Permittee must also analyze for ~~PCBs, and~~ dioxins since these are known to be by-products of open detonation events. PCBs have been eliminated from the annual sampling program since these constituents have not been detected in soil samples collected during the first five sampling events."

- SAMPLING AND ANALYSIS FOR AIR AND SOIL MONITORING, I.2, "The Permittee shall carry out ~~semiannual~~ soil sampling during the month of August and as soon as practicable after an OD event if such occurs during the sampling month. within 24 hours after the last semiannual open detonation event."

- SAMPLING AND ANALYSIS FOR AIR AND SOIL MONITORING, I.3, "Frequency of Sampling: The Permittee shall implement an ~~semiannual~~ soil sampling and analysis program as described in Permit Attachment J. An extended sampling event will occur every five (5) years as described in Permit Attachment J."