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

June 8, 2000

REPLY TO
ATTENTION OF:

Directorate of Environment

Mr. James P. Bearzi
Bureau Chief
Hazardous & Radioactive Materials Bureau
New Mexico Environment Department
P. O. Box 26110
Santa Fe, New Mexico 87502

**RE: Request for Class II Permit Modification for
U.S. Army Air Defense Artillery Center and Fort Bliss
Open Detonation Operational Permit
Permit No. NM 4213720101-01, 8 June 1995**

Dear Mr. Bearzi:

As required by the referenced permit, the Permittee, U.S. Department of Defense, U.S. Army Air Defense Artillery Center and Fort Bliss (Fort Bliss), is requesting a Class II modification for a process change. That change is receipt of off-site waste from White Sands Missile Range (WSMR), a contiguous Department of Defense (DOD) facility. The modification is not for increased quantity limits or for different wastes.

Background

The Permittee has achieved reductions in volume of waste generated and, through annual sampling, documented no significant impact to human health and the environment. It is, therefore, possible and prudent to consolidate DOD open detonation treatment for WSMR and Fort Bliss at the permitted unit.

Requested Changes

The changes requested are:

1. Module I, page 1 of 12, Section A, first sentence, delete "on site¹" and associated footnote.
2. Module I, page 11 of 12, Section G, please update address and telephone numbers for HRMB.
3. Attachment A, page 2 of 30, Physical and Chemical Characteristics of Waste and Residues, last paragraph, last sentence. Replace "on the accompanying manifest(s)." with:

"on the accompanying DOD inventory."

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4. Attachment A, page 6 of 30, Additional Requirements for Waste Generated Off-Site, delete the current sentence and replace it with:

“Off-site waste (i.e., waste generated outside of the Permittee’s facility) can only be received from White Sands Missile Range, a contiguous Government-owned, Department of Defense operated property. These wastes will conform to the requirements of waste generated on Fort Bliss.”

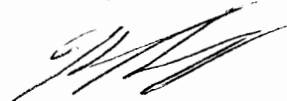
5. Attachment I, pages 2 of 19 and 3 of 19, Traffic Patterns: Insert the following after the second paragraph, before the paragraph that starts, “East of Davis Dome. . .:”

“Materials from White Sands Missile Range (WSMR) destined for OD treatment will be removed from WSMR bunkers and hauled to the OD treatment unit via the most direct route, using military roads when practicable. Materials will be moved Eastward to Hwy 54 on military roads, and from Hwy 54 to Davis Dome on military roads. Travel on Hwy 54 will be minimized and the precautions specified elsewhere in this permit will be followed.”

Copies of the affected pages are enclosed, with requested changes printed in red. Electronic versions of the requested changes were sent to Mr. Glenn von Gonten of the HRMB via email on June 8, 2000.

Your consideration of this request is appreciated and additional justification and/or information can be supplied upon request. If a meeting would be appropriate, we would be glad to attend. Please do not hesitate to call me at (915) 568-3782 if you have any questions or need additional information.

Sincerely,



Keith Landreth
Director of Environment

Enclosure

Copies Furnished:

John Kieling, HRMB
Glenn von Gonten, HRMB
Patricia McKernan, Fort Bliss DOE