



DEPARTMENT OF THE AIR FORCE

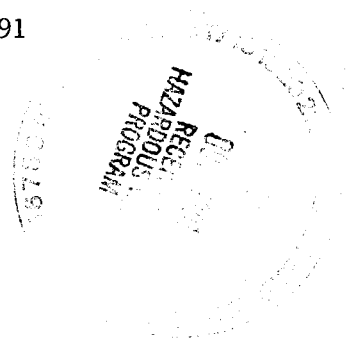
HEADQUARTERS 833D COMBAT SUPPORT GROUP (TAC)  
HOLLOMAN AIR FORCE BASE, NM 88330-5000

16 Oct 1991

REPLY TO  
ATTN OF: 833 CSG/DEV

SUBJECT: Disposal Alternatives - Picric Acid

TO: Mr. Coby Muckelroy  
Hazardous and Radioactive Waste Bureau  
New Mexico Health and Environment Dept  
1190 St. Francis Drive  
Santa Fe, New Mexico 87503



1. Holloman is currently involved in a Remedial Investigation/Feasibility Study (RI/FS) for 29 Installation Restoration Program (IRP) sites. Our RI/FS Plan has been coordinated with the NMED Toxic Sites Bureau. This is to advise you of recent actions taken with respect to one particular site (Site 4, Acid Trailer Burial Site) and to request your guidance on the proper disposal methods for explosive compounds found buried at the site.
2. Per our record search, Site 4 was believed to be a burial site for tank trailers used to transport fuming nitric acid. During our preliminary investigations we found several materials were disposed of at the site. We have lab packed the majority of the materials we found and will have our contractor dispose of them in accordance with EPA procedures. Should you desire, we can provide a complete list of compounds discovered thus far.
3. In addition to the above mentioned wastes, 7 pint containers of picric acid were also found. As you are aware, picric acid is a highly unstable explosive compound. In a liquid form it may be transported. However, with age, it turns to crystals. When the crystals are stressed, they detonate. Per conversation with TSgt Coonen, Explosive Ordinance Disposal Equipment Section, the state of the picric acid found at this site was "in the most dangerous state, i.e., crystallized in heavy, solid chunks". It was his opinion that moving the material from the site was very risky. He further stated that because Site 4 is isolated from the main base area and the access roads are rough, the material could not be transported in a vehicle, and hand carrying the material across the desert would also be very dangerous to his personnel. The material was detonated on site with Plastic Explosive C-4.
3. We regret this action was not coordinated with the NMED Hazardous and Radioactive Waste Bureau in advance of our action; and, after the fact realized that even though this effort was being worked under our IRP program, i.e., CERCLA, and coordinated with the NMED Toxic Sites Bureau, we may have in fact have violated RCRA standards with respect to on-site disposal of a waste without a permit or prior approval. Future coordination with the NMED Hazardous and Radioactive Waste Bureau will be accomplished prior to any such

*Readiness is our Profession*

actions by the base. For the purposes of Site 4, and our continued effort at the site including the RI/FS and ultimate clean-up activities, we request an approval letter of our actions or otherwise guidance with respect to appropriate management of this material.

4. Holloman does not have a facility to store unstable compounds such as crystallized picric acid, nor is it feasible for us to transport it off base. We did not anticipate finding this material at this site and do not know if there is more to be found or if there are other similar compounds on site. The site contains far more wastes than originally anticipated and we are consequently having to go back to our command and request additional funds to complete our work. From a safety perspective, our contractor is reevaluating safety constraints for additional work in the area.

5. Site 4 is situated adjacent to Ritas Draw, which houses a state listed endangered species, the White Sands Pup Fish. We have prioritized this site in our IRP program for this reason. We believe the restoration of this area is important for the protection of the Pup Fish habitat but will await your response and guidance for future actions on the site.

6. The point of contact for this is Sharon Moore at 479-3931.

  
HOWARD E. MOFFITT  
Deputy Base Civil Engineer

cc: 833 AD/JA (Capt Spurlin)  
833 CES/DEOD (TSGT Luckenbaugh)