



DEPARTMENT OF THE AIR FORCE

HEADQUARTERS 49TH FIGHTER WING (ACC)
HOLLOMAN AIR FORCE BASE, NEW MEXICO

10 FEB 1998

C. Cornelius
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MEMORANDUM FOR NEW MEXICO ENVIRONMENT DEPARTMENT

Attn: Mr. Robert S. (Stu) Dinwiddie
Hazardous and Radioactive Materials Bureau
2044 Galisteo
P.O. Box 26110
Santa Fe NM 87502

FROM: 49 CES/CD
550 Tabosa Avenue
Holloman AFB NM 88330-8458

SUBJECT: Request to Administratively Amend the Holloman AFB (HAFB) Resource
Conservation and Recovery Act (RCRA) Permit for Open Detonation Treatment Unit
ID No. NM657124422

1. This is to request that the RCRA Permit for the 20,000 Pound Open Detonation Treatment Unit at HAFB be amended through administrative methods to address the following issues: update the actual location of the facility, address partial closure of the northern section of the bermed area, clarify type and origin of material to be treated, establish protocol for emergency detonation events, and revise the quarterly sampling procedure. HAFB would like to meet with you and your representatives before 6 Mar 98 to discuss the topics detailed below.

Course of Requested Modifications

2. Recently, the Explosive Ordnance Disposal (EOD) Manager reviewed one of the several maps from the 20,000 Pound Open Detonation Unit (ODU) RCRA Permit and questioned the accuracy of the map. HAFB personnel then reviewed the permit and found that there are some variations between permit maps. Base personnel utilized recently-acquired Global Positioning System (GPS) equipment to verify the actual location of the ODU. The GPS results show the ODU is slightly north of the area depicted in the originally-submitted permit map questioned by EOD personnel. The actual location of the ODU was initially sited inside the existing fenced area. This fenced area was not initially sited with the aid of GPS technology. We would like to update the permit and insert a more accurate map of the site (similar to the one attached and referenced in Para 3).

and

3. The ODU permit requires continued grading of the ODU grounds and upkeep of the berm after each detonation event. Meeting these permit requirements, EOD personnel have inadvertently extended the perimeter of the bermed area from approximately 120 feet in diameter to an area approximately 250 feet east to west by 450 feet north to south. This area was extended north from the original location of the ODU because of the additional area available in the northern portion of the fenced zone (attached map). Due to this expanding and the initial siting

ambiguities of the unit, it currently extends on to White Sands Missile Range (WSMR) property by approximately 150 feet. HAFB proposes to follow closure procedures specified in the 20,000 Pound ODU RCRA permit for the northern section of the ODU which extends on to WSMR. Closure of this area would reduce the size of the unit to initially-designed dimensions and configuration. HAFB recently initiated closure sampling of the northern area. Approximate locations of the sampling are shown on the attached map. If the sample results show the area to be at or below background levels determined by the Background Study for the 20,000 pound ODU, then HAFB will initiate clean closure activities. Clean closure consists of covering this area with 6 to 12 inches of local soil material to match surrounding grade and would complete the closure process. The remaining ODU area would be located solely on HAFB property. We would also relocate the northern boundary of the fence to preclude the reoccurrence of gradual creep.

4. We would also like the procedure for obtaining an emergency permit for treatment at the ODU to be clarified, including a general statement regarding the treatment of confiscated contraband. This may include a general description of contraband and approval to detonate it in the emergency detonation permit section. Additionally, we would like to include a list of NMED phone numbers to call 24 hours a day to obtain an oral authorization emergency detonation permit.

5. As you may know, HAFB has experienced difficulties in the past meeting the permit requirement of sampling the last detonation event of each quarter. This is due to unavoidable schedule changes which can postpone the last scheduled quarterly detonation event to the next quarter. We feel the best way to correct this is to sample the first detonation event of each quarter. This change would clarify the sampling process and assure we sample the ODU soil each quarter in which a scheduled detonation event occurs. Utilizing this sampling schedule, there would be no reduction of sampling events.

Class I

6. Please contact Drew Lessard at (505) 475-5177 with your preferred meeting dates, referred in paragraph 1.

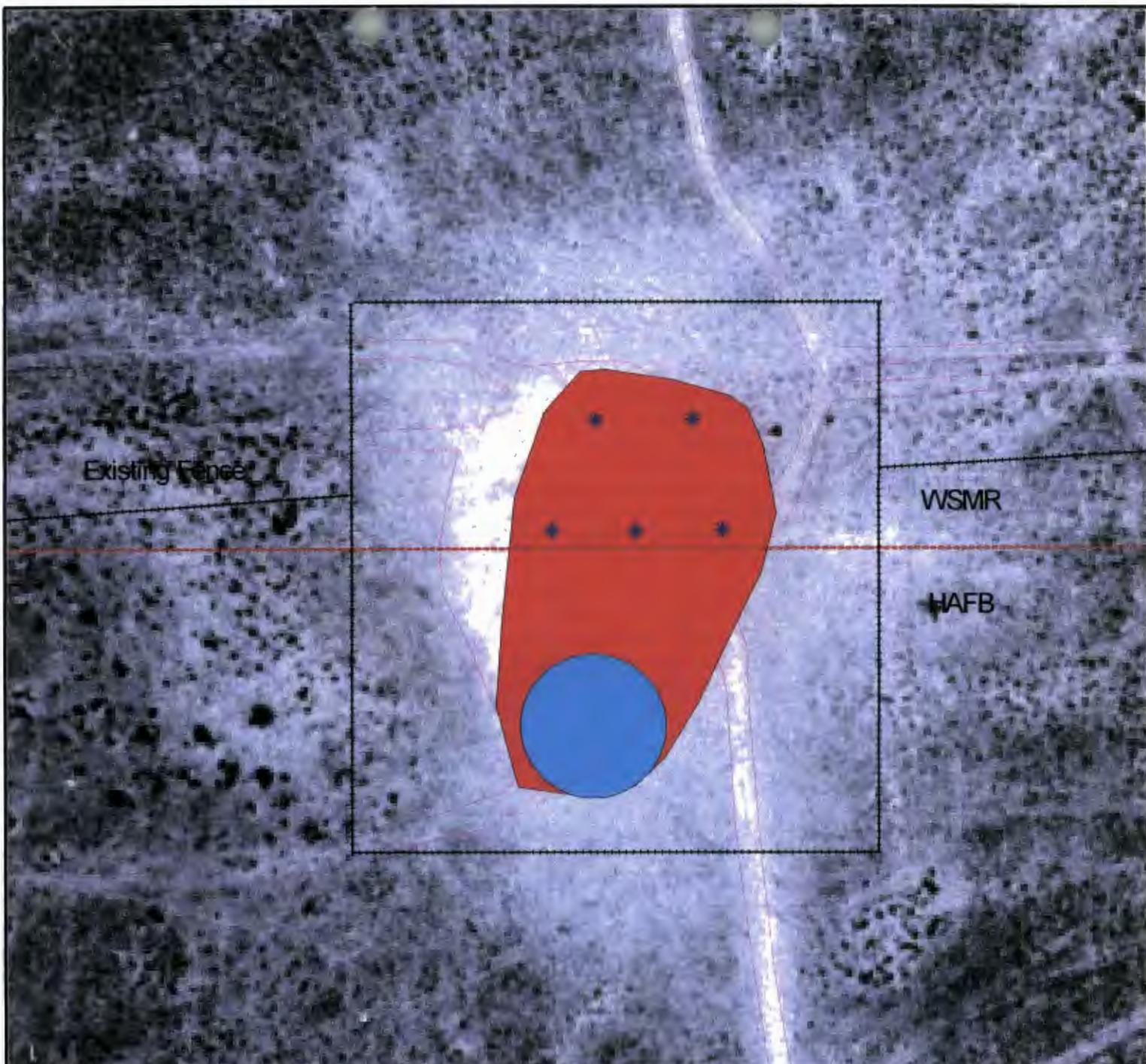
Other modification/corrective Action under RCRA

need gate for easement to WSMR property.

Howard E. Moffitt
HOWARD E. MOFFITT
Deputy Base Civil Engineer

Attachment:
Map of HAFB 20,000# ODU

cc w/Atch:
Cornelius Amindyas
Hazardous and Radioactive Materials Bureau, NMED
P.O. Box 26110
Santa Fe NM 87502



Prepared 10 February 1998 by:
 Drew Lessard, 49 CES/CEVR
 505 475-5177

HAFB 20,000# ODU



50 0 50 100 150 Feet

-  ODU Closure Sample Locations
-  HAFB Boundary
-  Road Edge
-  20,000 # OD Unit Existing
-  Proposed

INSTALLATION RESTORATION PROGRAM
 Holloman Air Force Base, NM

Managed by the IRP Office - (505) 475-5177