



DEPARTMENT OF THE AIR FORCE

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

5 MAR 1999

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) 300-Pound Open Burn (OB) Closure Plan

1. Per the discussion between you, Mr. Cornelius Amidyas and HAFB representative Mr. Drew Lessard on 21 Jan 98, HAFB requests clarification regarding the start of the 90-day storage period for the excavated ordnance material, and requests an Emergency OB Permit to treat potentially-energetic material excavated from the trenches. We also must inform you that HAFB is pursuing a risk-based closure for the 300-Pound OB Unit per the approved closure plan. With your assistance, HAFB can expedite the restoration of this site.

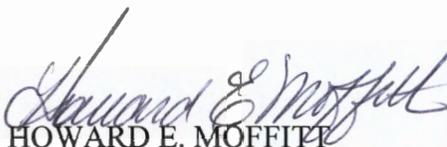
2. The process of segregating residual ordnance into inert and potentially-energetic material is a critical step during the closure process. Segregation reduces the quantity of material that is considered energetic without costly and time-consuming treatment. However, segregation is tedious and requires maximum safety precautions. To effectively complete this task safely, HAFB must initiate segregation activities after the trenches are excavated and backfilled. This will minimize human exposure because all unnecessary personnel will have left the site. As a result, much or all of the 90-day storage time limitation will be expired when segregation activities commence. HAFB requests that the 90-day storage time period begin after each container has been inspected and the material segregated. An additional extension may be requested if potentially-energetic material cannot be treated, as described below, within the 90-day time frame.

3. The Emergency OB Permit is requested to properly treat some of the potentially-energetic material. The closure plan required all suspect ordnance material be treated at HAFB's 20,000-Pound Open Detonation Unit (ODU). However, while some of the material can be treated at this ODU, most of the material is small arms munitions which precludes the use of detonation as a viable treatment alternative. An emergency OB permit would allow HAFB to properly treat all suspect material after the segregation process. This material can then be certified as inert

material by base Explosive Ordnance Disposal (EOD) personnel. Once this material is certified inert, it can be transported to an approved Treatment Storage and Disposal Facility by conventional means without risking safety on US highways. It must be understood that all material treated will still be considered hazardous unless determined not to be by waste profiling procedures. At this time, HAFB requires approximately 180 days to treat all suspect material. An extension may be requested if current material quantities have been underestimated by a substantial amount. The preliminary design of the OB unit is shown on the attached sketch. This propane-fired unit, which will burn cleanly and minimize emissions, was co-designed and approved by base EOD personnel and the restoration contractor. The unit will achieve the required temperature for the prescribed time to render the material inert. Another option, which was considered unacceptable, would be to utilize a refined petroleum fuel-fired unit. The propane-fired unit is preferred over a refined petroleum fired unit because of its ability to reach the uniform elevated temperatures.

4. Based on preliminary confirmation soil samples of the trenches, HAFB requests, per section 3.3 of the approved closure plan, a risk-based closure of the 300-Pound OB Unit. HAFB proposes to use the Environmental Protection Agency, Region VI, Risk Based Concentration (RBC) values. The target closure levels for all constituents of concern are below RBC-Residential screening levels. HAFB proposes to follow clean closure requirements stipulated in the approved closure plan. At this time, HAFB believes no additional closure requirements will be necessary because we will achieve Residential levels for all constituents, thus there will be no limitations on future land use.

5. If you require additional information, please contact Drew Lessard at (505) 475-5177.

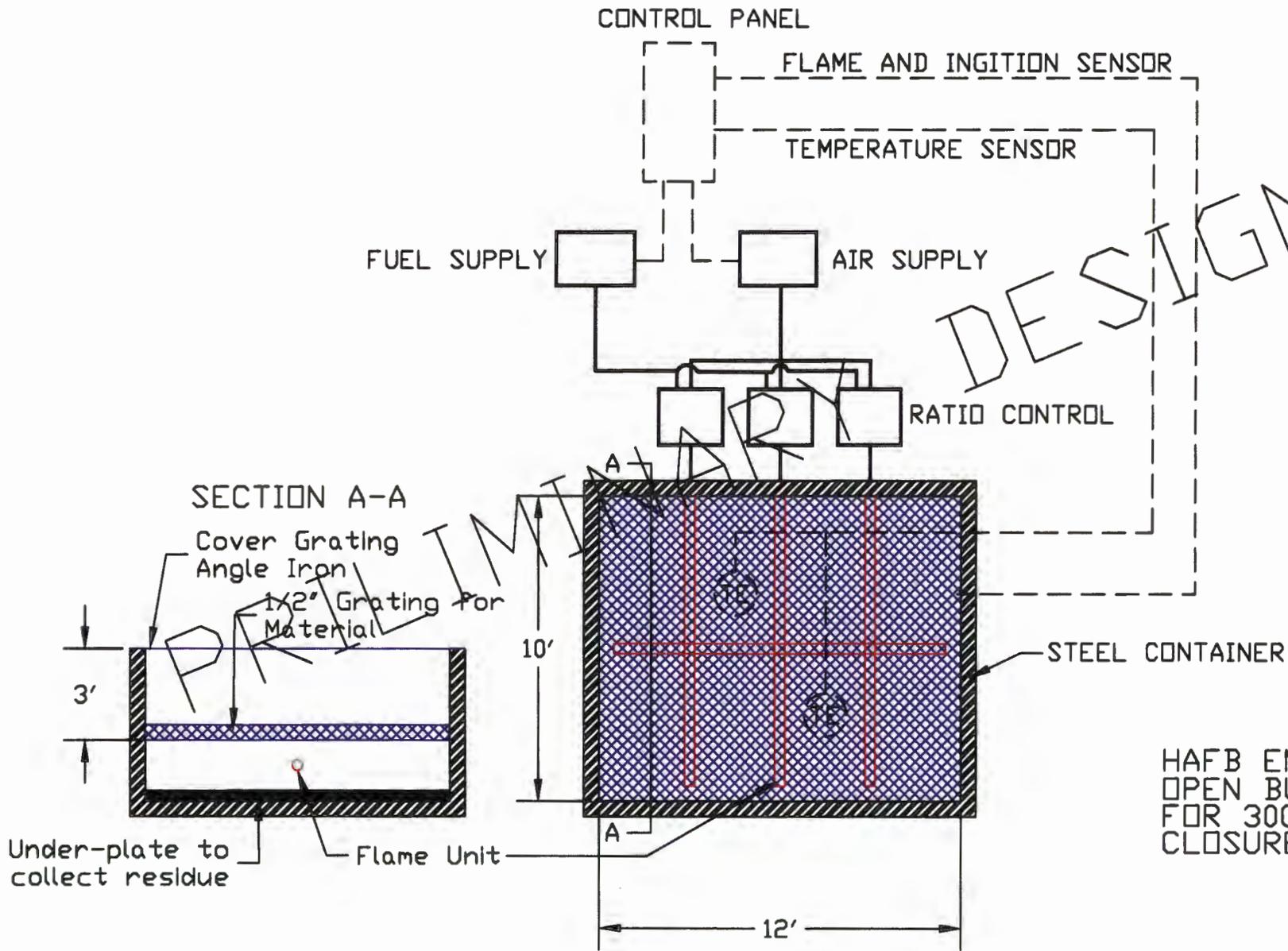

HOWARD E. MOFFITT
Deputy Base Civil Engineer

Attachment:

Sketch – Preliminary design for the OB Treatment Unit for
HAFB 300-Pound OB Closure Plan

cc w/Atch:

Cornelius Amindyas
Hazardous and Radioactive Materials Bureau, NMED
P.O. Box 26110
Santa Fe NM 87502



HAFB EMERGENCY
 OPEN BURN UNIT
 FOR 300-POUND OB
 CLOSURE PLAN