



GARY E. JOHNSON  
GOVERNOR

State of New Mexico  
**ENVIRONMENT DEPARTMENT**  
Hazardous & Radioactive Materials Bureau  
2044 Galisteo  
P.O. Box 26110  
Santa Fe, New Mexico 87502  
(505) 827-1557  
Fax (505) 827-1544



MARK E. WEIDLER  
SECRETARY

EDGAR T. THORNTON, III  
DEPUTY SECRETARY

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

April 3, 1998

Howard E. Moffitt  
Deputy Base Civil Engineer  
49 CES/CD  
550 Tabosa Ave.  
Holloman Air Force Base, NM 88330-8458

**SUBJECT: Request to Modify OD Treatment Unit Operational Permit  
EPA I.D. Number NM6572124422**

Dear Mr. Moffitt:

The New Mexico Environment Department (NMED) Hazardous and Radioactive Materials Bureau (HRMB) received Holloman Air Force Base's (HAFB's) request for Permit Modification to the Open Detonation (OD) Treatment Unit. You proposed in your letter of February 10, 1998 that you intend to do the following:

- 1) update the actual location of the facility;
- 2) conduct RCRA corrective measures for the northern section of the bermed area that extends into White Sands Missile Range property;
- 3) clarify type and origin of material to be treated;
- 4) establish protocol for emergency detonation events; and
- 5) revise the quarterly sampling procedure.

After reviewing HAFB's request to amend the subject OD treatment unit permit, the HRMB has determined that the requested changes can be categorized as a Class I Modification by the New Mexico Hazardous Waste Management Regulations 20 NMAC 4.1.900 incorporating 40 CFR §270.42(a); §270.42 Appendix I, Paragraphs B(1)(a), (B)(5)(b), and K(15).

The New Mexico Hazardous Waste Fee Regulations (20 NMAC 4.2) require the assessment of permit fees for permit modifications. Permit modifications classified as minor (Class I). Minor permit modifications require less extensive staff time and administrative effort to review the impact of the modifications on the permit.

The Class I Modification to amend the Open Detonation Treatment Unit requirements proposed above is subject to a fee of one thousand (\$1,000.00) dollars.

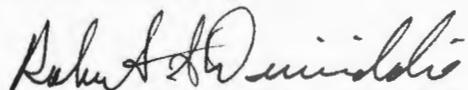
Please send payment by check made out to **NMED Hazardous Waste Permit Fees**, and send by **Certified Mail** to:

The Manager, RCRA Permits Management Program  
New Mexico Environment Department  
Hazardous and Radioactive Materials Bureau  
2044A Galisteo Street  
P.O. Box 26110  
Santa Fe, New Mexico 87502

This fee must be paid within thirty (30) calendar days from the date you receive this letter. Failure to pay the fee within this designated period will result in HAFB's permit modification denial. The modification request will be processed after receipt of the fees.

Thank you for your continual cooperation in our permitting process. If you have any questions, please call me, Mr. Jerry Bober, or Mr. Cornelius Amindyas of my staff at (505) 827-1561.

Sincerely,



Robert S. (Stu) Dinwiddie, Ph.D., Manager  
RCRA Permits Management Program  
Hazardous and Radioactive Materials Bureau

cc: Benito Garcia, Chief, HRMB  
David Neleigh, EPA Region VI (6PD-N)  
File: Red, HAFB, 98  
Track: HAFB, 4/3/98, HAFB, HRMB/CA, Request for Permit Mod.



## DEPARTMENT OF THE AIR FORCE

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

*JSu*

10 FEB 1998

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

FEB 1998  
RECEIVED

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

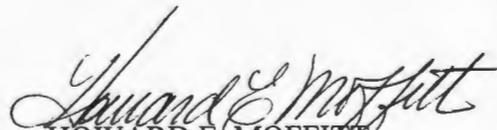
1. This is to request that the RCRA Permit for the 20,000 Pound Open Detonation Treatment Unit at HAFB be amended through administrative methods to address the following issues: update the actual location of the facility, address partial closure of the northern section of the bermed area, clarify type 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.
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).
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.

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

  
HOWARD E. MOFFITT  
Deputy Base Civil Engineer

Attachment:

Map of HAFB 20,000# ODU

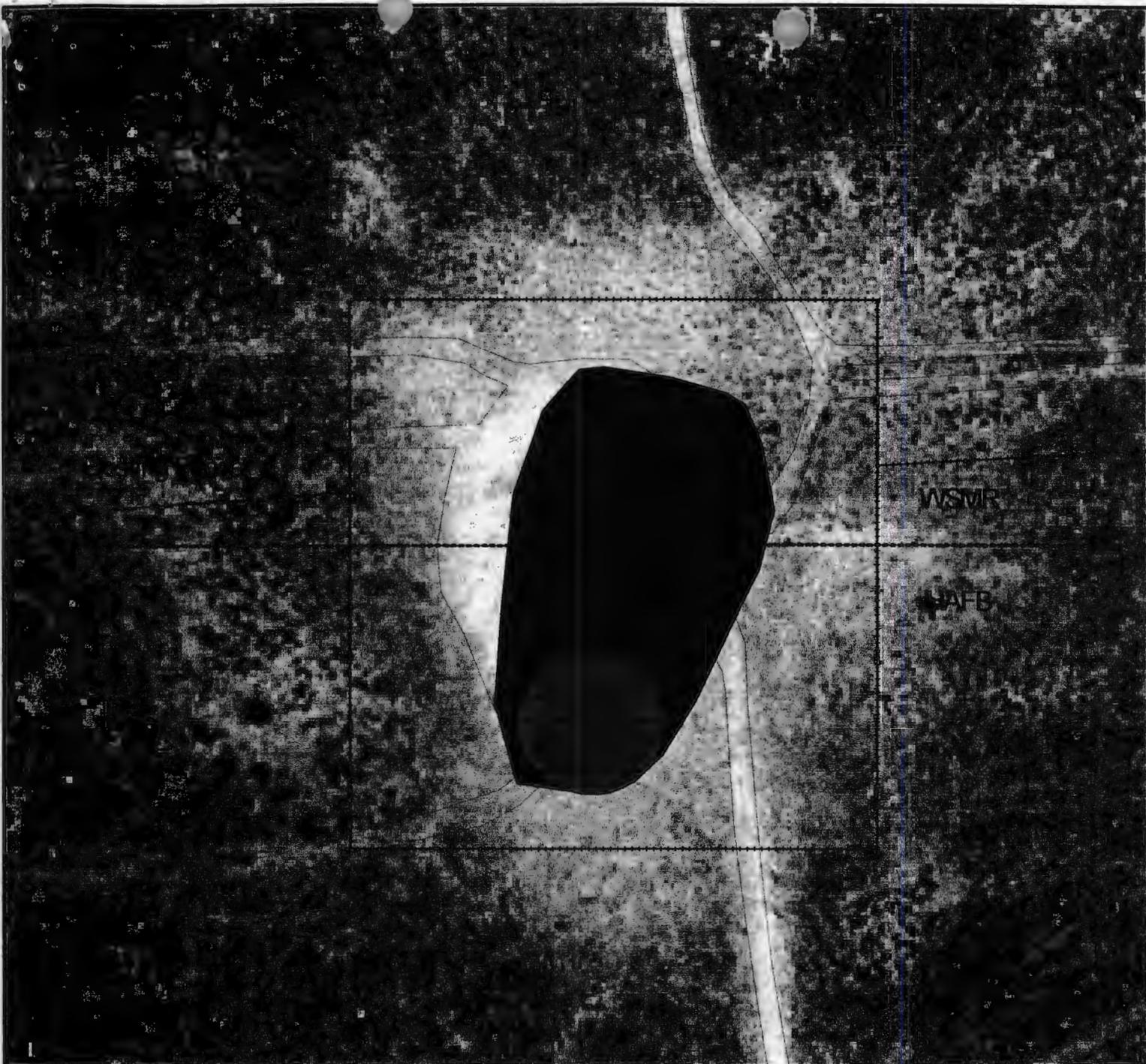
cc w/Atch:

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