

HAFB 2002

**State of New Mexico
ENVIRONMENT DEPARTMENT**

Hazardous Waste Bureau

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**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

July 30, 2002

Howard Moffitt
Deputy Base Civil Engineer
49 CES/CEV
550 Tabosa Avenue
Holloman AFB, New Mexico 88330

**SUBJECT: TRANSPORT OF EXPENDED TARGET MUNITIONS
HOLLOMAN AFB**

Dear Mr. Moffitt:

The New Mexico Environment Department (NMED) is responding to a request from Mr. Al Ball of AHNTECH for information as to whether Holloman AFB (HAFB) is required to have a permit to transport expended target munitions from the Centennial Range to the Oscura Range located on White Sands Missile Range. Our understanding is that HAFB collects expended BDU 33 and DM 8 dummy bombs on the Centennial Range and transports them via public roads to the Oscura Range for storage and eventual collection and recycling by contractors. We also understand that any live dummy bombs are blown-in-place by HAFB's EOD team. Based on the information provided, NMED has determined that the expended target munitions are solid waste, but will not be considered to be hazardous waste unless HAFB declares them to be so because they no longer meet the characteristic of ignitibility (D001) nor are they listed as a hazardous waste in 20.4.1.200 NMAC, incorporating 40 CFR part 261.

As I previously explained to Mr. Ball, New Mexico has adopted the Military Range Rule (see 20.4.1.700 NMAC, incorporating 40 CFR 266.205 and 266.206). If, as we understand, the HAFB EOD team certifies that the expended target munitions are safe, then HAFB is not required

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to obtain a permit to transport the expended target munitions from Centennial Range to the Oscura Range via public roads.

This determination is based on the information that was provided to NMED by Mr. Ball. If our understanding is not correct, then our determination may need to be revised. If you have any questions about this approval letter, please contact Ms. Anna Maestas of my staff at 505-428-2507.

Sincerely,



Debby Brinkerhoff
Manager
Compliance and Technical Assistance Program

DB:gvg

cc: J. Bearzi, NMED HWB
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file: Reading, WSMR Red '02, HAFB Red '02