



BRUCE KING
GOVERNOR

State of New Mexico
ENVIRONMENT DEPARTMENT
Harold Runnels Building
1190 St. Francis Drive, P.O. Box 26110
Santa Fe, New Mexico 87502
(505) 827-2850



JUDITH M. ESPINOSA
SECRETARY

RON CURRY
DEPUTY SECRETARY

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

June 10, 1994

Mr. Walter S. Darr III
Chief, Compliance
Environmental Management Division
377 ABW/EMC
200 Wyoming Blvd SE
Kirtland Air Force Base, NM 87117

RE: Required Supplementary Information

Dear Mr. Darr:

This letter is to request information that the New Mexico Environment Department (NMED) needs in order to refine the Kirtland Air Force Base (KAFB) Open Detonation draft Permit. The information supplied by KAFB will be incorporated into the draft Permit before the Secretary of NMED makes a final determination on the subject document. KAFB is required to address the following items and submit the response to NMED before June 17, 1994:

- (1) (a) Clarify whether KAFB accepts hazardous waste from off-site on regular basis or only as an emergency off-site situation.
[This question refers to the list of the generators given in KAFB's part B permit application (page 2-6, Table 2-1) that was reproduced on page A6 of the draft Permit].
- (b) Explain whether KAFB has Standard Operating Procedures (SOPs) that address emergency off-site wastes.
- (c) If KAFB regularly accepts hazardous waste from the generators listed on page A6 of the draft permit, KAFB must explain the discrepancy between such an act and the prohibition of accepting such non-DOD off-site waste that is stated in Air Force Regulations (AFR) 127-100, Section 1-5, page 11 (August 3, 1990).



- (2) Reorganize the list of wastes to be treated at the Open Detonation into five (5) columns as shown in the example below. The original list of waste was submitted earlier by KAFB in Attachment A, in response to the August 1993 Notice of Technical Deficiency. The new list will need to be reorganized as in the following example:

<u>Ordnance</u>	<u>Major Reactant</u>	<u>Major Inert (Casings)</u>	<u>Net Explosive Weight (lbs)</u>	<u>EPA Waste Code</u>
Blasting Cap	PETN/Tetryl	Aluminum	0.0019	D003
Cartridge, 40mm M674	Single-based	Steel and Aluminum	0.21	D003
Charge, demo, C-4	RDX, Polyisobutylene	Plastic	30.00	D003
Charge, shaped, C-4	RDX Polyisobutylene	Steel	0.83	D003
Simulator, Grenade, M116	Black Powder	Aluminum and Lead	5.32	D003 D008
Detonator, Electric	Tetryl/RDX	Steel and Aluminum	8.00	D001, D003
...etc.				

- (3) State the number of explosive open detonations that are conducted on a typical day when waste munitions are demolished.
- (4) Submit to NMED, the latest City of Albuquerque Air Quality Application form that was completed by KAFB. Include information about releases and air pollutants that are of open detonation origin. This information will enable NMED to determine whether or not, KAFB needs to conduct Air Modeling prior to final determination on the KAFB draft permit by the Secretary, NMED.

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- (5) Submit an updated Part A permit Application indicating the exact amount of waste munitions that will be demolished at the KAFB OD treatment unit per detonation event. This is to avoid using two different values for the same operation/OD unit. For example, the part A permit application had 3,000 pounds net explosive weight of waste munitions that would be treated per explosive detonation event; while values of 1,500 pounds were cited at the May 5, 1994 informal public meeting.

If you have any questions regarding the above requirements, you may contact Cornelius Amindyas of my staff at (505) 827-4308.

Sincerely,



Barbara Hoditschek, Manager
RCRA Permits Program
Hazardous and Radioactive Materials Bureau

cc: Benito Garcia, Chief, HRMB