

KAFB 94

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**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

August 12, 1994

Ms. Kathleen A. Carlson, Area Manager
U.S. Department of Energy
Albuquerque Operations Office
Kirtland Area Office
P.O. Box 5400
Albuquerque, New Mexico 87115

RE: Knowledge of Process as an Alternative to Chemical Analysis

Dear Ms. Carlson:

This is a reply to your letter dated July 1, 1994 in which you reiterated your request for a public hearing should the New Mexico Environment Department (NMED) not allow Knowledge of Process (KOP) to be used to characterize hazardous waste in lieu of chemical analysis.

It was agreed at the meeting of June 30, 1994 between SNL, DOE, KAFB and NMED, that KAFB should demonstrate why KOP ought to be used instead of chemical analysis, to characterize hazardous waste destined for treatment at the KAFB open detonation unit. KAFB has submitted the required information to NMED, and NMED has found the demonstration to be satisfactory.

NMED hereby accepts the use of generator supplied KOP to characterize the wastes to be demolished by KAFB at the open detonation treatment unit in lieu of chemical analysis. Enclosed is a copy of NMED's modifications made to the draft permit text.

The changes NMED has made to the draft Permit allow DOE's concerns. NMED would therefore appreciate DOE's written withdrawal of a request for a hearing within 15 days of receipt of this letter.

KAFB1471



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If you have any questions regarding this matter you may contact me or Cornelius Amindyas of my staff at (505) 827-4308.

Sincerely,



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

Enclosure

cc: Benito Garcia, Chief, HRMB
Walter Darr, KAFB
Thomas Blejwas, SNL
File Red, 1994

ATTACHMENT:

PROPOSED RESOLUTION TO DOE/SNL REQUEST FOR PUBLIC HEARING ON
KIRTLAND AIR FORCE BASE OPEN DETONATION DRAFT PERMIT

August 12, 1994

The following are the modifications made to the draft permit text following the meeting of June 30, 1994:

(1) GENERAL WASTE ANALYSIS

The verbiage of Module II, Permit Conditions B., and C.2.a., page II-1, will now read as the following bold printed and highlighted paragraphs:

II.B.1. The manufacturer of the explosives shall provide the Permittee Material Safety Data Sheets (MSDS) that contain all the chemical composition (and percentages) required by this permit. The Permittee shall review the generator supplied information to check for completeness and accuracy, to ensure that the waste meets the criteria of the waste acceptance plan. The Permittee shall also use the generator supplied information and process knowledge to characterize the explosive waste munitions.

II.B.2. The Permittee shall inform the Secretary verbally within 24 hours, and subsequently in writing, within 7 days of any deviation from the wastes listed in Permit Attachment M and Appendix AA, prior to their demolition.

II.C.2.a. The Permittee shall not accept any off-site waste if the generator does not provide the information required in the above Permit Condition B.1.

The third sentence on page A4 of the draft permit that reads "Knowledge of process will not be accepted in lieu of chemical analysis" has been removed from the permit text. The required data in Table A-1 (pH...etc) may be obtained from process knowledge and related literature.

Permit Condition C.2.a. of Module II of the permit text which formerly read "The Permittee shall not accept any off-site waste,..." has been omitted, since the Permittee will be accepting waste from off-site generators including those listed in Table A-2, Permit Attachment A.