



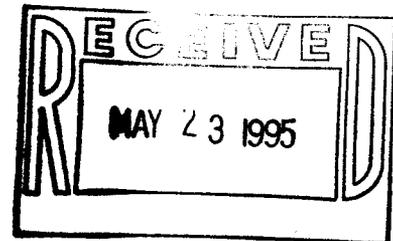
DEPARTMENT OF THE AIR FORCE
HEADQUARTERS 377TH AIR BASE WING (AFMC)

ENTERED

17 May 95

377 ABW/EMC
2000 Wyoming SE
KAFB, NM 87117-5659

Barbara Hoditschek
Manager, RCRA Permit Program
Hazardous and Radioactive Materials Bureau
525 Marquez Place
Santa Fe, New Mexico 87502



Dear Ms. Hoditschek

Enclosed are the comments to the Kirtland Air Force Base (KAFB) Explosive Ordnance Disposal (EOD) Facility Open Burn Unit draft Resource Conservation and Recovery Act (RCRA) Part B permit. Also enclosed is the disk of comments that KAFB has on the draft EOD Open Burn unit Part B permit.

Please contact Terry Cooper at 846-0007 if you have any questions about KAFB comments.

Respectfully

Walter S. Darr
WALTER S. DARR III
Chief, Compliance
Environmental Management

Attachments:

1. Comments
2. Disk

KAFB1617



KAFB Comments on the Explosive Ordnance Disposal Facility Open Burning Unit

COMMENT	RESOLUTION
<p>1. Module II, Page 2, C.2.a: The Permittee shall receive hazardous waste for treatment at the OB unit from the New Mexico based generators listed in Table A-2, Permit Attachment A.</p> <p align="center"><i>page 1</i></p>	<p>As the Air Force consolidates, it may be necessary for KAFB to receive waste munitions for treatment from other DOD organizations outside of New Mexico. The intent of Table A-2, list potential suppliers, is not all inclusive. Suggestion: The Permittee may receive hazardous waste for treatment at the OB unit from the potential suppliers listed in Table A-2 but is not all inclusive.</p>
<p>2. Permit Attachment A: Containers section: DOT-authorized containers received from the manufacturer, supplier, or other DOE contractor.</p>	<p>DOE will most likely not have waste treated at the OB unit. Therefore, the statement should read: "DOT-authorized containers received from the manufacturer, supplier, or generator."</p>
<p>3. Permit Attachment A, Page 6, On-Site Generated Waste</p>	<p>The lead slag left from treatment operations may be recycled. However, recycling may not be done in all instances. Therefore KAFB recommends that the statement should read: "The residual lead recovered from the burnt munitions will be recycled if possible."</p>

**KAFB Comments on the Draft Explosive Ordnance Disposal Facility Open Burning Unit
Dated April 1995 (Continued)**

COMMENT	RESOLUTION
<p>4. Permit Attachment A, Page 7, Boundary Conditions, Third Bullet</p>	<p>The statement maximum total quantity of waste (explosive and combined solid) treated during any year shall not exceed 80,000 lbs (36,281 kg) NEW. This statement is not true as written. The definition of NEW is Net Explosive Weight which doesn't take into account lead weight and casing weights. The OB unit is treating only the explosive component. Therefore, the statement should read " The maximum total quantity of waste (explosive) treated during any year shall not exceed 80,000 lbs (36,281 kg) NEW."</p>
<p>5. Permit Attachment A, Page 8, Waste Generated as a Result of Treatment at the OB Unit, Top of Page.</p>	<p>The lead may or may not be recycled. Therefore, the statement should read "... off-site hazardous waste management facility and the lead recycled if possible".</p>

**KAFB Comments on the Draft Explosive Ordnance Disposal Facility Open Burning Unit
Dated April 1995 (Continued)**

COMMENT	RESOLUTION
6. Module III, Page 5 Paragraph J.4.	<p>"The Permittee shall not carry out open burning activities on any day when a thunderstorm is imminent or has been forecast, or when violent weather threatens within ten (10) miles of the subject treatment unit".</p> <p>The word forecast is too general. As the statement is written virtually every day during the summer months a thunder storm is forecast (anywhere from a 5% to 90% chance). Suggestion is that the word forecast be eliminated to allow operations to occur during the summer months. Also, the provision of 10 miles is too restrictive based on the location of the OB unit to the mountains. Air Force regulations state that 3 miles be the limiting factor. Therefore based on the two suggestions the paragraph should read "The Permittee shall not carry out open burning activities on any day when a thunderstorm is imminent or when violent weather threatens within three (3) miles of the subject treatment unit."</p>
7. Permit Attachment G, Design Plans and Specifications, Paragraph 1, General Description	<p>"The OB treatment unit at the EOD range is located southeast of Manzano Base and approximately 10 miles for the southern perimeter of KAFB." Change southern to northern</p>
8. Permit Attachment I, Paragraph 6, Location of Operation	<p>Add letter e. Thermal Radiation Site: 4,000 feet</p>