



DEPARTMENT OF THE AIR FORCE
HEADQUARTERS 377TH AIR BASE WING (AFMC)
CERTIFIED MAIL: Z 106 120-492
RETURN RECEIPT REQUESTED



377 ABW/EMR
2000 Wyoming Blvd SE
Kirtland AFB NM 87117-5659

Ms. Nancy Morlock, Environmental Engineer
RCRA Permits Branch
U.S. EPA Region 6
1445 Ross Ave, Ste 1200
Dallas TX 75202-2733

Dear Ms. Morlock


Attached are the Kirtland Air Force Base (KAFB) responses to your comments on the Explosive Ordnance Disposal (EOD) Facility Open Burning (OB) RCRA Part B draft permit. The responses were sent to the NMED on 9 June 1995.

KAFB has added soil sampling and cleanup of SWMU 6-19 to the closure plan in the EOD OB draft permit. Soil sampling and cleanup would occur when the facility (both open burning and open detonation) is deactivated. This is scheduled for the year 2050.

As an active, permitted facility, site restoration is required only upon closure. We believe SWMU 6-19 should be removed from the corrective action schedule defined in Module IV of the KAFB HSWA Permit. If you concur, we will initiate Class III permit modification procedures.

Please contact me at 505-846-0053 if you have any questions.

Respectfully


CHRISTOPHER B. DeWITT, R.P.G.
Chief, Restoration Branch
Environmental Management Division

Attachment:
Comment Responses

cc:
NMED-HRMB (Mr. Pullen)
NMED-HRMB (Mr. Amindyas)

KAFB1660





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

9 June 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

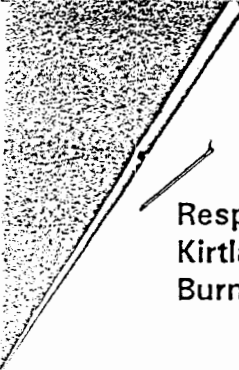
Enclosed are the responses to the comments on the Kirtland Air Force Base (KAFB) Explosive Ordnance Disposal (EOD) Facility Open Burn Unit draft Resource Conservation and Recovery Act (RCRA) Part B permit made by U.S. Environmental Protection Agency, Region VI.

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

Respectfully


WALTER S. DARR III
Chief, Compliance
Environmental Management

Attachments:
1. Comments



Response to U.S. Environmental Protection Agency (EPA) dated May 26 1995 on the Kirtland Air Force Base (KAFB) Explosive Ordnance Disposal (EOD) Facility Open Burning (OB) RCRA Part B draft permit.

Question 1:

KAFB should provide a detailed site map locating the new thermal treatment unit and the existing detonation pits at the EOD Range. The current closure plan contains no site maps.

Response:

A detailed map will be added to the closure plan that contains the old burn pit. The SWMU 6-19 being asked to be removed and is the old burn pit not the detonations pits. There are no inactive detonation pits.

Question 2:

KAFB should discuss how, or if, the operations at the thermal treatment unit will impact the detonation pits/EOD Range area.

Response:

The new thermal treatment unit (burn pit) is located approximately 20 feet from SWMU 06-19 (burn pit) which has been filled with soil. There are no old detonation pits on the EOD range only the burn pit (SWMU 06-19). The detonation area is active and "pits" created by detonations are filled periodically and reused.

Question 3:

The detonation pits should be explicitly referenced in the closure plan. At a minimum, the closure plan should explain how the material disposed of in the detonation pits, including ordnance material and contraband, will be removed and disposed of. The closure plan should also discuss confirmatory sampling in the excavated pits.

Response:

A confusion exists on what a detonation pit and a burn pit is. The SWMU 06-19 is an old burn pit not a detonation pit. There are no SWMU detonation pits. The old burn pit (SWMU 06-19) is filled with soil with all the contraband/ordnance material having been removed. At the time of closure SWMU 06-19 will be sampled to the original pit depth. This language will be added to the closure plan.

Question 4:

EPA recommends that a baseline survey of this area be included as a permit condition. The baseline survey should include groundwater quality analysis, particularly since the depth to groundwater in this area is shallow.

Response:

Ground water wells are currently located up gradient and down gradient of the EOD Range. The Department of Energy, Sandia National Laboratories (DOE/SNL) does

Quarterly sampling and have not found any contamination due to the EOD Range. If
60E/SNL discontinue the water quality sampling in the EOD range area, KAFB will
take over the sampling. Therefore, a baseline survey is not necessary. Quarterly soil
sampling is conducted at the EOD range to determine contamination status from
operations.