



**Department of Energy**

Field Office, Albuquerque  
Kirtland Area Office  
P.O. Box 5400  
Albuquerque, New Mexico 87115

**NOV 06 1995**



**CERTIFIED MAIL - RETURN RECEIPT REQUESTED**

Mr. Benito Garcia, Bureau Chief  
New Mexico Environment Department  
Hazardous and Radioactive Materials Bureau  
2044 Galisteo Street  
P.O. Box 26110  
Santa Fe, NM 87505-2100

Dear Mr. Garcia:

Enclosed is a copy of a letter, with enclosures, to Mr. David Neleigh of EPA, Region 6, concerning the Department of Energy's (DOE) request for a Class III permit modification to officially recognize the transfer of two Sandia National Laboratories/New Mexico Environmental Restoration sites to Kirtland Air Force Base. DOE's requested permit modification would change Table 2 of the Hazardous and Solid Waste Amendments Module (Module IV) of the Resource Conservation and Recovery Act Hazardous Waste Facility Operating Permit for Sandia National Laboratories, New Mexico, Permit No. NM5890110518-1, EPA I.D. No. NM5890110518.

If you have any questions, please contact John Gould at (505) 845-6089, or Mark Jackson at (505) 845-6288.

Sincerely,

*Brenda A. Harmon*  
Michael J. Zarhorski  
Acting Area Manager

Enclosures



**Mr. Benito Garcia**

**2**

**cc w/o enclosures:**

**T. Trujillo, AL, ERD**

**C. Soden, AL, EPD**

**J. Johnsen, KAO-AIP**

**W. Cox, 7581, SNL, MS 1147**

**W. Keener, 7500, SNL, MS 1315**

**E. Krauss, 11300, SNL, MS 0141**

**D. Neleigh, EPA, Region 6**

**L. Aker, AIP**

**R. Kern, NMED, Santa Fe, NM**



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*Bob S  
Steve P  
Return to RAC*

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**CERTIFIED MAIL -- RETURN RECEIPT REQUESTED**

Mr. David Neleigh, Sector Chief  
New Mexico Federal Facilities Section  
Multimedia Planning and Permitting Division  
U. S. Environmental Protection Agency, Region VI  
1445 Ross Avenue, Mail Stop 6PD-N  
Dallas TX 75202-2733

Dear Mr. Neleigh:

The Department of Energy (DOE) requests a Class III permit modification to remove Environmental Restoration (ER) Site 61-B (Schoolhouse Mesa Test Site: Cratering Area) from Table 2 of the Hazardous and Solid Waste Amendments (HSWA) Module (Module IV) of the Resource Conservation and Recovery Act (RCRA) Final Permit for Sandia National Laboratories, New Mexico (SNL/NM), EPA ID No. NM5890110518.

*Site  
61B*

DOE is requesting this permit modification to reflect the fact that Kirtland Air Force Base (KAFB) has accepted responsibility for ER Site 61B. KAFB accepted remediation responsibility for ER Site 61B in its May 1, 1995 Class I permit modification notice of the addition of SS-69 and RW-68 as two new KAFB Solid Waste Management Units (SWMUs). The May 1, 1995 notification was sent from Mr. Christopher DeWitt to you. In his permit modification notice, Mr. DeWitt stated:

Site RW-68 consists of at least 10 slag piles, some of which are radioactive and contain cadmium, lead, and selenium above regulated TCLP levels. Included in RW-68 is the nearby Sandia National Laboratories site ER-61B, Cratering Area South of Schoolhouse Mesa, for which Kirtland AFB is accepting remediation responsibility. Aircraft were subjected to endurance tests at the cratering area, then transported to the slag pile area for incineration. (See Attachment 1.)

Please note that although ER-Site 61B has been removed from the Table 2 Subunits, 61A and 61C remain as SNL/NM ER sites, therefore the proposed Table 2 (see Attachment 6) retains the listing of ER site 61.

**Correction of Erroneous Listing of Manzano Base in Table 2**

As an additional matter, the DOE requests a Class III permit modification to delete ER Site 225 (Manzano Base) from Table 2 of Module IV. DOE requests the deletion of

*Site 225*

Site 225 from Table 2 in order to correct an administrative error made by SNL/NM. Nancy Morlock of your staff has been notified of this error.

It is important to emphasize that, at the time SNL/NM erroneously added Manzano Base to Table 2 (in mid-1992), SNL/NM did not know that KAFB had already accepted responsibility for investigation and cleanup of the Base. SNL/NM did not know that Manzano Base had been listed in Appendix I of the Hazardous Waste Permit for Kirtland Air Force Base, EPA.I.D. No. NM9570024423 on November 14, 1990, the effective date of KAFB's RCRA permit. See Attachment 2, which contains copies of the transmittal memorandum, the cover page, and the original Appendix I of KAFB's RCRA Operating Permit (dated October 10, 1990); also see Attachment 3, which contains copies of the current list of KAFB SWMUs. Attachments 2 and 3 demonstrate that Manzano Base was listed on KAFB's Hazardous Waste Permit prior to SNL/NM's erroneous double listing of the base on Table 2.

Currently, KAFB owns and operates Manzano Base, one of 13 Atomic Energy Commission (AEC) storage areas. SNL/NM involvement with the Base has been limited to storage of radioactive or hazardous materials and performing maintenance operations on nuclear weapons components. Although SNL/NM's involvement with the other 12 AEC storage areas is similar to Manzano Base, the Department of Defense, not DOE, has taken responsibility for the environmental assessment of those weapons storage facilities.

Enclosed with this letter is a crosswalk of SWMUs and potential SWMUs at Manzano Base, including the status of KAFB investigations at these SWMUs, as requested by Ms. Morlock (see Attachment 4). Also enclosed is a letter from Chris DeWitt, Director of the KAFB Installation Restoration Program, which confirms that KAFB has accepted responsibility for Manzano Base (see Attachment 5). DOE's proposed new Table 2, which incorporates the changes DOE is requesting with this letter is also enclosed (see Attachment 6).

Pursuant to 40 CFR §270.42(c) and Section IV.B.3.b of the above-referenced permit, DOE is providing the following information:

**40 CFR §270.42(c)(1)(i)** -- DOE requests that EPA remove ER Sites 61B and 225 from Table 2 of Module IV of the above-referenced permit.

**40 CFR §270.42(c)(1)(ii)** -- DOE's requested permit modification is a Class III modification according to the 40 CFR Part 270 table titled, "Appendix I to §270.42 - Classification of Permit Modification."

**40 CFR §270.42(c)(1)(iii)** -- DOE needs to remove ER Sites 61B and 225 from Table 2 of the above-referenced permit to clarify remedial responsibilities between SNL/NM and KAFB.

Mr. David Neleigh

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**40 CFR §270.42(c)(1)(iv)** -- Approval of this request to remove a SWMU for which DOE is no longer responsible would change only the HSWA module of the above-referenced permit; there would be no changes to the information required by 40 CFR §§270.13 through 270.21, 270.62, or 270.63.

**40 CFR §270.42(c)(2)** -- A notice of the modification request, enclosed (see Attachment 7), will be mailed to all persons on the facility mailing list and to the appropriate units of State and local government as specified in 40 CFR 124.10(c)(ix) (see distribution list below). The notice will also be mailed for publication in the Albuquerque Tribune and the Albuquerque Journal within 7 days of the date of this modification request. DOE will provide EPA with evidence of the mailing and publication. The notice will contain all the information required by 40 CFR §270.42(c)(2)(i) through (vi).

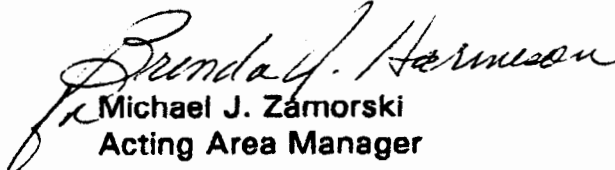
**40 CFR §270.42(c)(3)** -- DOE will place a copy of the permit modification request and supporting documents in the public reading rooms in the vicinity of the permitted facility.

**40 CFR §270.42(c)(4)** -- DOE will hold a public meeting no earlier than 15 days after the publication of this notice, and no later than 15 days before the close of the 60-day comment period. The meeting will be held in Albuquerque, in the vicinity of the permitted facility.

**40 CFR §270.42(c)(5)** -- DOE will provide 60 days for comments on this permit modification request. The comment period will begin on the date DOE publishes the notice in the local newspapers. In the public notice, DOE will identify the Agency contact for comments.

If you have any questions, please contact John Gould at (505) 845-6089, or Mark Jackson at (505) 845-6288.

Sincerely,

  
Michael J. Zamorski  
Acting Area Manager

Enclosures

**Mr. David Neleigh**

**4**

**cc: w/enclosures**

**T. Trujillo, AL, ERD**

**L. Aker, AIP**

**W. Cox, 7581, SNL, MS 1147**

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**C. Lojek, 7585, SNL, MS 1148**

**N. Morlock, EPA, Region 6**

**R. Kern, NMED, Santa Fe, NM**