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MEMORANDUM

TO: KAFB File

FROM: Frank Sanchez, Inspector, RCRA Enforcement

DATE: July 16, 1996

SUBJECT: Skeet Range Debris

On July 11, 1996, Nina Wells (Surface Water Quality Bureau) accompanied me to KAFB to examine the road where lead containing debris from the Sandia Skeet Range was deposited. Heavy, recent rains prompted this visit since the road leading from the C&D landfill to the skeet range intersects the Tijeras Arroyo floodplain.

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At the pre-site visit meeting, it was determined (verbally) that the practice of grating the skeet range twice/year and using the debris as road bedding has been going on since at least 1980. Personnel from the Civil Engineering (CE) group stated this to Marsha Carra of the Environmental Compliance Bureau (ECB). It is unknown if this was a practice prior to 1980. The last event was believed to have commenced on May 14, 1996.

During the site visit it was observed that the road where debris from the skeet range was placed no longer was black in color. Rather, it looked like a normal dirt road. Terry Cooper and Patrick Montano (ECB) stated that traffic on the road had been extensive over the last three weeks (8 trucks/hr - 8 hrs./day). The black, clay pigeon debris placed on the road had apparently been pulverized by the heavy trucks or had been washed off the road by heavy rain or both.

Up to five inches of rain had fallen in Tijeras Canyon the night before and the flow in the arroyo had jumped the banks into the floodplain. The morning of the 11th, the flow in the arroyo reached two-three feet, according to Mr. Montano, and had washed out the section in the road intersecting the arroyo (3 ft. deep). Three feet of asphalt was placed on the washed out section so that transport activities could resume. The floodplain, extending out between 100-200 yards was completely saturated. According to Mr. Montano, the arroyo had been flowing continuously for three days due to the extensive rains in the area.

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The inspectors walked the road and sections of the arroyo looking for lead shot on the surface and sub-surface. Not a single pellet was found. According to Terry Cooper, the entire road was combed in search of lead shot when ECB had learned of the disposal activity and not a single pellet was found. Where the lead shot went remains unknown.

At the end of the site visit, NMED was provided with all the information ECB had on this incident including an MSDS on the fluorescent, orange paint used on the clay pigeons. NMED provided KAFB with a draft report from our initial site visit which had a number of questions regarding this incident that remain unknown. KAFB assured us that these questions would be answered, and the answers provided to NMED soon.