RCRA PART B PERMIT APPLICATION

MELROSE RANGE

COPY

20 JANUARY 1990

PREPARED BY

ENVIRONMENTAL PLANNING SECTION

CANNON AIR FORCE BASE, NEW MEXICO 88103-3251

TABLE OF CONTENTS

		Page
Section A.	PART A APPLICATION	A-1
Section B.	FACILITY DESCRIPTION	
B-1.	General Description	B-1
B-2.	Topographic Map	B-2
B-2a.	General Requirements	B-2
B-2a(1).	Land Uses	B-2
B-2a(2).	Hazardous Waste Management Facility Boundary	B-2
B-2a(3).	Wind Rose	B-2
B-2a(4).	Access Control	B-2
B-2a(5).	Injection and Withdrawal Wells	B-3
B-2a(6).	Buildings, Treatment, Storage, Disposal Areas, and Other Structures	B-3
B-2a(7).	Recreation Areas	B-3
B-2a(8).	Runoff Control Systems	B-3
B-2a(9).	Storm, Sanitary, and Process Sewers	B-3
B-2a(10).	Loading and Unloading Areas	B-4
B-2a(11).	Fire Control Facilities	B-4
B-2a(12).	Surface Waters	B-4
B-2a(13).	Flood Control/Drainage Barriers	B-4
B-3.	Location Information	B-4
B-3a.	Seismic Considerations	B-4
B-3b.	Floodplain Standard	B-4
B-4.	Traffic Information	B-5
B-4a.	Traffic Control	B-5
B-4b.	Access Road Surfacing	B-5
B-4c.	Load-Bearing Capacity	B-5
B-4d.	Traffic Control Signals	B-5
Section C.	WASTE CHARACTERISTICS	
C-1.	Chemical and Physical Analyses	C-1
C-1a.	Containers [Guidance]	C-1
C-1b.	Tanks [Guidance]	C-1
C-1c.	Wastes Piles [Guidance]	C-1
C-1d.	Surface Impoundments [Guidance]	C-2
C-1e.	Incinerators	C-2
C-1f.	Landfills [Guidance]	C-2
C-1g.	Land Treatment [Guidance]	C-2
C-1h.	Additional Requirements for Land Storage, Treatment and Disposal Facilities	C-2
C-2.	Waste Analysis Plan	C-2
C-2a.	General Discussion of Analysis	C-3
C-2a(1).	Analysis Perameters (Identity Unknown)	C-3
C-2a(2).	Analysis Parameters (Known)	C-4

TABLE OF CONTENTS (Continued)

Section		Page
C-2b.	Test Methods	C-4
C-2c.	Sampling Methods	C-4
C-2d.	Frequency of Analysis	C-4
C-2e.	Chain of Custody	C-4
C-2f.	Record Keeping	C-5
C-2g.	Additional Requirements for Facilities Handling Ignitable, Reactive or Incompatible Wastes	C-5
Section D.	PROCESS INFORMATION	
D-1.	Containers	D-1
D-2.	Tanks	D-1
D-3.	Waste Piles	D-1
D-4.	Surface Impoundments	D-1
D-5.	Incinerators	D-1
D-6.	Landfills	D-1
D-7.	Land Treatment	D-1
D-8.	Thermal Treatment	D-2
Section E.	GROUNDWATER MONITORING	E-1
Section F.	PROCEDURES TO PREVENT HAZARDS	
F-1.	Security	F-1
F-1a.	Security Procedures and Equipment	F-1
F-1a(1).	24-Hour Surveillance System	F-1
F-1a(2).	Barrier and Means to Control Entry	F-2
F-1a(2)(a).	Barrier	F-2
F-1a(3).	Warning Signs	F-2
F-1b.	Waiver	F-2
F-2.	Inspection Schedule	F-2
F-2b.	Specific Process Inspection Requirements	F-6
F-2b(1).	Thermal Treatment	F-6
F-2c.	Remedial Action	F-6
F-3.	Waiver of Preparedness and Prevention Requirements	F-7
F-3a.	Equipment Requirements	F-7
F-3b.	Aisle Space Requirement	F-7
F-4.	Preventive Procedures, Structures, and Equipment	F-7
F-4a.	Runoff	F-7
F-4b.	Water Supplies	F-7
F-4c.	Equipment and Power Failure	F-7
F-5.	Prevention of Reaction of Ignitable, Reactive, and Incompatible Wastes	F-8
F-5a.	Precautions to Prevent Ignition or Reaction of Ignitable or Reactive Wastes	F-8
F-5b.	General Precautions for Handling Ignitable or Reactive Wastes and Mixing of Incompatible Wastes	F-8

TABLE OF CONTENTS (Continued)

Section		Page
Section G.	CONTINGENCY PLAN	
G-1.	General Information	G-1
G-2.	Emergency Coordinators	G-1
G-3.	Specific Contingency Plan	G-2
G-3a.	Release of Hazardous Waste to Air, Land, or Water	G-2
G-4.	Prevention of Recurrence or Spread of Fires, Explosions, or Releases	G-3
G-4a.	Post-Emergency Equipment Maintenance	G-3
G-5.	Emergency Equipment	G-3
G-6.	Coordination Agreements	G-4
G-7.	Evacuation Plan	G-4
G-8.	Required Reports	G-5
Section H.	PERSONNEL TRAINING	
H-1	Outline of Training Program	H-1
H-1a.	Job Titles and Duties	H-1
H-1b.	Training Director	H-10
H-1c.	Relevance of Training to Job Position	H-10
H-1d.	Training for Emergency Response	H-10
H-1d(1).	Procedures for Using, Inspecting, Repairing, and Replacing Facility Emergency and Monitoring Equipment	H-10 H-10
H-1d(2).	Key Parameters for Automatic Waste Feed Cut-Off Systems	H-11
H-1d(3).	Communications or Alarm Systems	H-11
H-1d(4).	Response to Fires or Explosions	H-11
H-1d(5).	Response to Groundwater Contamination Incidents	H-11
H-1d(6).	Shutdown of Operations	H-11
Section I.	CLOSURE PLAN, POST-CLOSURE PLAN AND FINANCIAL REQUIREMENTS	
I-1.	Closure Plans	I-1
I-1a.	Closure Performance Standard	I-1
I-1b.	Partial and Final Closure Activities	I-2
I-2	Post Closure Plans	I-2
I-3	Notices Required for Disposal Facilities	I-2
I-3a.	Notice to Local Land Authority	I-2
I-3b.	Notice in Deed to Property	I-3
I-4	Closure Cost Estimate	I-3
Section J.	OTHER FEDERAL LAWS	J-1
Section K.	CERTIFICATION	K-1
Appendices		
B-1	Map of Melrose Range	
C-1	Munitions Found During Range Clearance	
C-2	Soil Analysis of Melrose Range Thermal Treatment Area	

TABLE OF CONTENTS (Continued)

Appendices (continued)

C-3	Parameters and Rational for Analysis of Range Operations
C-4	Sample Submission Form
D-1	CAFB Regulation 136-18: Decontamination of Melrose Bombing/ Gunnery Range and Disposal of Airmunitions
D-2	Chapter 7 of "Explosive Safety Standards" (Air Force Regulation 127-100)
D-3	Operational Procedures for the Melrose Range Thermal Treatment Area
F-1.	Explosive Ordnance Disposal Reports
F-2	Section I - "Safety and Accident Prevention" from General Instructions for Disposal of Conventional Munitions (T.O. 11A-1-42)
G-1.	Coordination Agreements
H-1.	Training Schedule for Personnel Involved in the Disposal of Ordnance

LIST OF FIGURES

Number		Page
B-1.	Location Map of Cannon AFB and Melrose Bombing Range	B-6
B-2.	Annual Wind Roses	B-7
C-1	Identification Process Flow Chart	C-6
C-2	Chain of Custody Record	C-7
C-3	Sample Submission Form	C-8
G-1.	Pollution Incident Report	G-6

LIST OF TABLES

Number		Page
F-1	General Inspection Schedule	F-3
G-1	Emergency Coordinators	G-8
G-2	Spill Response Team	G-9
G-3	Local, State, and Federal Emergency Contacts	G-10

FORM 1 GENERAL

EPA

U.S. ENVIRONMENTAL PROTECTION AGENCY

GENERAL INFORMATION

Consolidated Permits Program

(Read the "General Instructions" before starting.)

EPA I.D. NUMBER: F N M 5 5 7 2 1 2 4 4 5 6

LABEL ITEMS

I. EPA I.D. NUMBER

III. FACILITY NAME

V. FACILITY MAILING ADDRESS

VI. FACILITY LOCATION

PLEASE PLACE LABEL IN THIS SPACE

GENERAL INSTRUCTIONS

If a preprinted label has been provided, affix it in the designated space. Review the information carefully; if any of it is incorrect, cross through it and enter the correct data in the appropriate fill-in area below. Also, if any of the preprinted data is absent *(the area to the left of the label space lists the information that should appear)*, please provide it in the proper fill-in area(s) below. If the label is complete and correct, you need not complete Items I, III, V, and VI *(except VI-B which must be completed regardless)*. Complete all items if no label has been provided. Refer to the instructions for detailed item descriptions and for the legal authorizations under which this data is collected.

II. POLLUTANT CHARACTERISTICS

INSTRUCTIONS: Complete A through J to determine whether you need to submit any permit application forms to the EPA. If you answer "yes" to any questions, you must submit this form and the supplemental form listed in the parenthesis following the question. Mark "X" in the box in the third column if the supplemental form is attached. If you answer "no" to each question, you need not submit any of these forms. You may answer "no" if your activity is excluded from permit requirements; see Section C of the instructions. See also, Section D of the instructions for definitions of bold-faced terms.

SPECIFIC QUESTIONS	MARK 'X' YES	NO	FORM ATTACHED
A. Is this facility a **publicly owned treatment works** which results in a **discharge** to **waters of the U.S.**? (FORM 2A)		X	
B. Does or will this facility *(either existing or proposed)* include a **concentrated animal feeding operation** or **aquatic animal production facility** which results in a **discharge** to **waters of the U.S.**? (FORM 2B)		X	
C. Is this a facility which currently results in **discharges** to **waters of the U.S.** other than those described in A or B above? (FORM 2C)		X	
D. Is this a proposed facility *(other than those described in A or B above)* which will result in a **discharge** to **waters of the U.S.**? (FORM 2D)		X	
E. Does or will this facility treat, store, or dispose of **hazardous wastes**? (FORM 3)	X		
F. Do you or will you inject at this facility industrial or municipal effluent below the lowermost stratum containing, within one quarter mile of the well bore, underground sources of drinking water? (FORM 4)		X	
G. Do you or will you inject at this facility any produced water or other fluids which are brought to the surface in connection with conventional oil or natural gas production, inject fluids used for enhanced recovery of oil or natural gas, or inject fluids for storage of liquid hydrocarbons? (FORM 4)		X	
H. Do you or will you inject at this facility fluids for special processes such as mining of sulfur by the Frasch process, solution mining of minerals, in situ combustion of fossil fuel, or recovery of geothermal energy? (FORM 4)		X	
I. Is this facility a proposed **stationary source** which is one of the 28 industrial categories listed in the instructions and which will potentially emit 100 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		X	
J. Is this facility a proposed **stationary source** which is NOT one of the 28 industrial categories listed in the instructions and which will potentially emit 250 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		X	

III. NAME OF FACILITY

1 SKIP M E L R O S E A I R F O R C E R A N G E

IV. FACILITY CONTACT

A. NAME & TITLE *(last, first, & title)*: 2 E A R L S G A R R Y L T C O L U S A F B C E

B. PHONE *(area code & no.)*: 5 0 5 | 7 8 4 | 2 0 0 8

V. FACILITY MAILING ADDRESS

A. STREET OR P.O. BOX: 3 2 7 C S G / D E

B. CITY OR TOWN: 4 C A N N O N A I R F O R C E B A S E

C. STATE: N M

D. ZIP CODE: 8 8 1 0 3

VI. FACILITY LOCATION

A. STREET, ROUTE NO. OR OTHER SPECIFIC IDENTIFIER: 5 6 M I W & 5 M I S O F M E L R O S E N M

B. COUNTY NAME: C U R R Y & R O O S E V E L T

C. CITY OR TOWN: 6 C A N N O N A I R F O R C E B A S E

D. STATE: N M

E. ZIP CODE: 8 8 1 0 3

F. COUNTY CODE *(if known)*:

ONTINUED FROM THE FRONT

VII. SIC CODES (4-digit, in order of priority)

A. FIRST	B. SECOND
9711 (specify) NATIONAL DEFENSE	4532 (specify) To Air Transportation, APT Flying Field, Fixed Facilities and Related Services

C. THIRD	D. FOURTH
(specify)	(specify)

VIII. OPERATOR INFORMATION

A. NAME: DAVID E BENSON COL USAF MELROSE RANGE

B. Is the name listed in Item VIII-A also the owner? ☒ YES ☐ NO

C. STATUS OF OPERATOR (Enter the appropriate letter into the answer box; if "Other", specify.)
F = FEDERAL
S = STATE
P = PRIVATE
M = PUBLIC (other than federal or state)
O = OTHER (specify)

Answer: F (specify)

D. PHONE (area code & no.): A 505 784 2761

E. STREET OR P.O. BOX: 27 CSG/CC

F. CITY OR TOWN: CANNON AIR FORCE BASE

G. STATE: NM

H. ZIP CODE: 88103

IX. INDIAN LAND

Is the facility located on Indian lands? ☐ YES ☒ NO

X. EXISTING ENVIRONMENTAL PERMITS

A. NPDES (Discharges to Surface Water)	N	N/A
B. UIC (Underground Injection of Fluids)	U	N/A
C. RCRA (Hazardous Wastes)	R	N/A
D. PSD (Air Emissions from Proposed Sources)	9P	N/A
E. OTHER (specify)	9	N/A (specify)
E. OTHER (specify)	9	N/A (specify)

XI. MAP

Attach to this application a topographic map of the area extending to at least one mile beyond property boundaries. The map must show the outline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all springs, rivers and other surface water bodies in the map area. See instructions for precise requirements.

XII. NATURE OF BUSINESS (provide a brief description)

This facility provides treatment of unexploded munitions with expired shelf lives.

XIII. CERTIFICATION (see instructions)

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this application and all attachments and that, based on my inquiry of those persons immediately responsible for obtaining the information contained in the application, I believe that the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

NAME & OFFICIAL TITLE (type or print)	B. SIGNATURE	C. DATE SIGNED
DAVID E. BENSON, Col, USAF Combat Support Group Commander	David E Benson	22 Jan 90

COMMENTS FOR OFFICIAL USE ONLY

FORM 3 RCRA

EPA

U.S. ENVIRONMENTAL PROTECTION AGENCY

HAZARDOUS WASTE PERMIT APPLICATION

Consolidated Permits Program

(This form is required under Section 3005 of RCRA.)

I. EPA I.D. NUMBER

S												T/A	C
N	M	5	5	7	2	1	2	4	4	5	6		1

FOR OFFICIAL USE ONLY

APPLICATION APPROVED	DATE RECEIVED (yr., mo., & day)	COMMENTS

II. FIRST OR REVISED APPLICATION

Place an "X" in the appropriate box in A or B below *(mark one box only)* to indicate whether this is the first application you are submitting for your facility or a revised application. If this is your first application and you already know your facility's EPA I.D. Number, or if this is a revised application, enter your facility's EPA I.D. Number in Item I above.

A. FIRST APPLICATION *(place an "X" below and provide the appropriate date)*

[X] 1. EXISTING FACILITY *(See instructions for definition of "existing" facility. Complete item below.)*

FOR EXISTING FACILITIES, PROVIDE THE DATE *(yr., mo., & day)* OPERATION BEGAN OR THE DATE CONSTRUCTION COMMENCED *(use the boxes to the left)*

C	YR.	MO.	DAY
8	5 9	0 1	0 1

[ ] 2. NEW FACILITY *(Complete item below.)*

FOR NEW FACILITIES, PROVIDE THE DATE *(yr., mo., & day)* OPERATION BEGAN OR IS EXPECTED TO BEGIN

YR.	MO.	DAY

B. REVISED APPLICATION *(place an "X" below and complete Item I above)*

[ ] 1. FACILITY HAS INTERIM STATUS

[ ] 2. FACILITY HAS A RCRA PERMIT

III. PROCESSES – CODES AND DESIGN CAPACITIES

A. PROCESS CODE – Enter the code from the list of process codes below that best describes each process to be used at the facility. Ten lines are provided for entering codes. If more lines are needed, enter the code(s) in the space provided. If a process will be used that is not included in the list of codes below, then describe the process *(including its design capacity)* in the space provided on the form *(Item III-C)*.

B. PROCESS DESIGN CAPACITY – For each code entered in column A enter the capacity of the process.

1. AMOUNT – Enter the amount.
2. UNIT OF MEASURE – For each amount entered in column B(1), enter the code from the list of unit measure codes below that describes the unit of measure used. Only the units of measure that are listed below should be used.

PROCESS	PROCESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
Storage:		
CONTAINER *(barrel, drum, etc.)*	S01	GALLONS OR LITERS
TANK	S02	GALLONS OR LITERS
WASTE PILE	S03	CUBIC YARDS OR CUBIC METERS
SURFACE IMPOUNDMENT	S04	GALLONS OR LITERS
Disposal:		
INJECTION WELL	D79	GALLONS OR LITERS
LANDFILL	D80	ACRE-FEET *(the volume that would cover one acre to a depth of one foot)* OR HECTARE-METER
LAND APPLICATION	D81	ACRES OR HECTARES
OCEAN DISPOSAL	D82	GALLONS PER DAY OR LITERS PER DAY
SURFACE IMPOUNDMENT	D83	GALLONS OR LITERS

PROCESS	PROCESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
Treatment:		
TANK	T01	GALLONS PER DAY OR LITERS PER DAY
SURFACE IMPOUNDMENT	T02	GALLONS PER DAY OR LITERS PER DAY
INCINERATOR	T03	TONS PER HOUR OR METRIC TONS PER HOUR; GALLONS PER HOUR OR LITERS PER HOUR
OTHER *(Use for physical, chemical, thermal or biological treatment processes not occurring in tanks, surface impoundments or incinerators. Describe the processes in the space provided; Item III-C.)*	T04	GALLONS PER DAY OR LITERS PER DAY

UNIT OF MEASURE	UNIT OF MEASURE CODE
GALLONS	G
LITERS	L
CUBIC YARDS	Y
CUBIC METERS	C
GALLONS PER DAY	U
LITERS PER DAY	V
TONS PER HOUR	D
METRIC TONS PER HOUR	W
GALLONS PER HOUR	E
LITERS PER HOUR	H
ACRE-FEET	A
HECTARE-METER	F
ACRES	B
HECTARES	Q

EXAMPLE FOR COMPLETING ITEM III *(shown in line numbers X-1 and X-2 below)*: A facility has two storage tanks, one tank can hold 200 gallons and the other can hold 400 gallons. The facility also has an incinerator that can burn up to 20 gallons per hour.

S		T/A	C
C	DUP		1

LINE NUMBER	A. PROCESS CODE (from list above)	B. PROCESS DESIGN CAPACITY 1. AMOUNT (specify)	2. UNIT OF MEASURE (enter code)	FOR OFFICIAL USE ONLY
X-1	S 0 2	600	G	
X-2	T 0 3	20	E	
1	T 1 8	100	*	
2				
3				
4				

LINE NUMBER	A. PROCESS CODE (from list above)	B. PROCESS DESIGN CAPACITY 1. AMOUNT (specify)	2. UNIT OF MEASURE (enter code)	FOR OFFICIAL USE ONLY
5				
6				
7				
8				
9				
10				

CONTINUE ON REVERSE

ntinue... front.

PROC...S (continued)

SPACE FOR ADDITIONAL PROCESS CODE ... FOR DESCRIBING OTHER PROCESSES (c... "1..."). FOR EACH PROCESS ENTERED HERE INCLUDE DESIGN CAPACITY.

Process consists of burning approximately 20 pounds of unserviceable munitions per month (open burn of these products occurs the same day the range is cleaned). This operation is usually conducted on the third Saturday of each month. Sufficient dunnage, approximately 100 pounds, is burned to ensure complete comsumption of the explosives. Burn permit has been obtained from the State of New Mexico Environmental Improvement Division, Region IV Director. An annual renewal application is submitted for the burn permit.

*Unit of measure for Process design capacity is "Pounds per month"

DESCRIPTION OF HAZARDOUS WASTES

EPA HAZARDOUS WASTE NUMBER — Enter the four—digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four—digit number*(s)* from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.

ESTIMATED ANNUAL QUANTITY — For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non—listed waste*(s)* that will be handled which possess that characteristic or contaminant.

UNIT OF MEASURE — For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE	CODE	METRIC UNIT OF MEASURE	CODE
POUNDS	P	KILOGRAMS	K
TONS	T	METRIC TONS	M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

PROCESSES

1. PROCESS CODES:
   For listed hazardous waste: For each listed hazardous waste entered in column A select the code*(s)* from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.
   For non—listed hazardous wastes: For each characteristic or toxic contaminant entered in column A, select the code*(s)* from the list of process codes contained in Item III to indicate all the processes that will be used to store, treat, and/or dispose of all the non—listed hazardous wastes that possess that characteristic or toxic contaminant.
   Note: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code*(s)*.
2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.

TE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER — Hazardous wastes that can be described by re than one EPA Hazardous Waste Number shall be described on the form as follows:

1. Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B,C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
2. In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.
3. Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

AMPLE FOR COMPLETING ITEM IV *(shown in line numbers X-1, X-2, X-3, and X-4 below)* — A facility will treat and dispose of an estimated 900 pounds year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non—listed wastes. Two wastes corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated) pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

NO.	A. EPA HAZARD. WASTE NO (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES 1. PROCESS CODES (enter)	D. PROCESSES 2. PROCESS DESCRIPTION (If a code is not entered in D(1))
1	K054	900	P	T03 D80	
2	D002	400	P	T03 D80	
3	D001	100	P	T03 D80	
4	D002				included with above

Form 3510-3 (6-80)

CONTINUE ON PAGE 3

NOTE: Photocopy this page before completing if you have more than 26 wastes to list.

Form Approved OMB No. 158-S80004

EPA I.D. NUMBER (enter from page 1): W N M 5 5 7 2 1 2 4 4 5 6 — T/A 1

FOR OFFICIAL USE ONLY: W DUP — T/A 2 DUP

IV. DESCRIPTION OF HAZARDOUS WASTES (continued)

LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES 1. PROCESS CODES (enter)	D. PROCESSES 2. PROCESS DESCRIPTION (if a code is not entered in D(1))
1	D003	1020	P	T18 ?	
2					
3					
4					
5					
6					
7					
8					
9					
10					
11					
12					
13					
14					
15					
16					
17					
18					
19					
20					
21					
22					
23					
24					
25					
26					

EPA Form 3510-3 (6-80)

CONTINUE ON REVERSE

ıtinued from the front.

DESCRIPTION OF HAZARDOU ASTES *(continued)*

USE THIS SPACE TO LIST ADDITIONAL PROCESS CODES FROM ITEM D(1) ON PAGE 3.

EPA I.D. NO. *(enter from page 1)*

N	M	5	5	7	2	1	2	4	4	5	6	Y/A	C
													6

FACILITY DRAWING

existing facilities must include in the space provided on page 5 a scale drawing of the facility *(see instructions for more detail).*

. PHOTOGRAPHS

ll existing facilities must include photographs *(aerial or ground—level)* that clearly delineate all existing structures; existing storage, eatment and disposal areas; and sites of future storage, treatment or disposal areas *(see instructions for more detail).*

I. FACILITY GEOGRAPHIC LOCATION

LATITUDE *(degrees, minutes, & seconds)*	LONGITUDE *(degrees, minutes, & seconds)*
3 4 1 7 0 3 9	1 0 3 4 7 0 1 1

II. FACILITY OWNER

☐ A. If the facility owner is also the facility operator as listed in Section VIII on Form 1, "General Information", place an "X" in the box to the left and skip to Section IX below.

B. If the facility owner is not the facility operator as listed in Section VIII on Form 1, complete the following items:

1. NAME OF FACILITY'S LEGAL OWNER	2. PHONE NO. *(area code & no.)*

3. STREET OR P.O. BOX	4. CITY OR TOWN	5. ST.	6. ZIP CODE
	C G		

. OWNER CERTIFICATION

certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached ocuments, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the bmitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, cluding the possibility of fine and imprisonment.

NAME *(print or type)*	B. SIGNATURE	C. DATE SIGNED
DAVID E. BENSON, Colonel, USAF Combat Support Group Commander	David E Benson	22 Jan 90

. OPERATOR CERTIFICATION

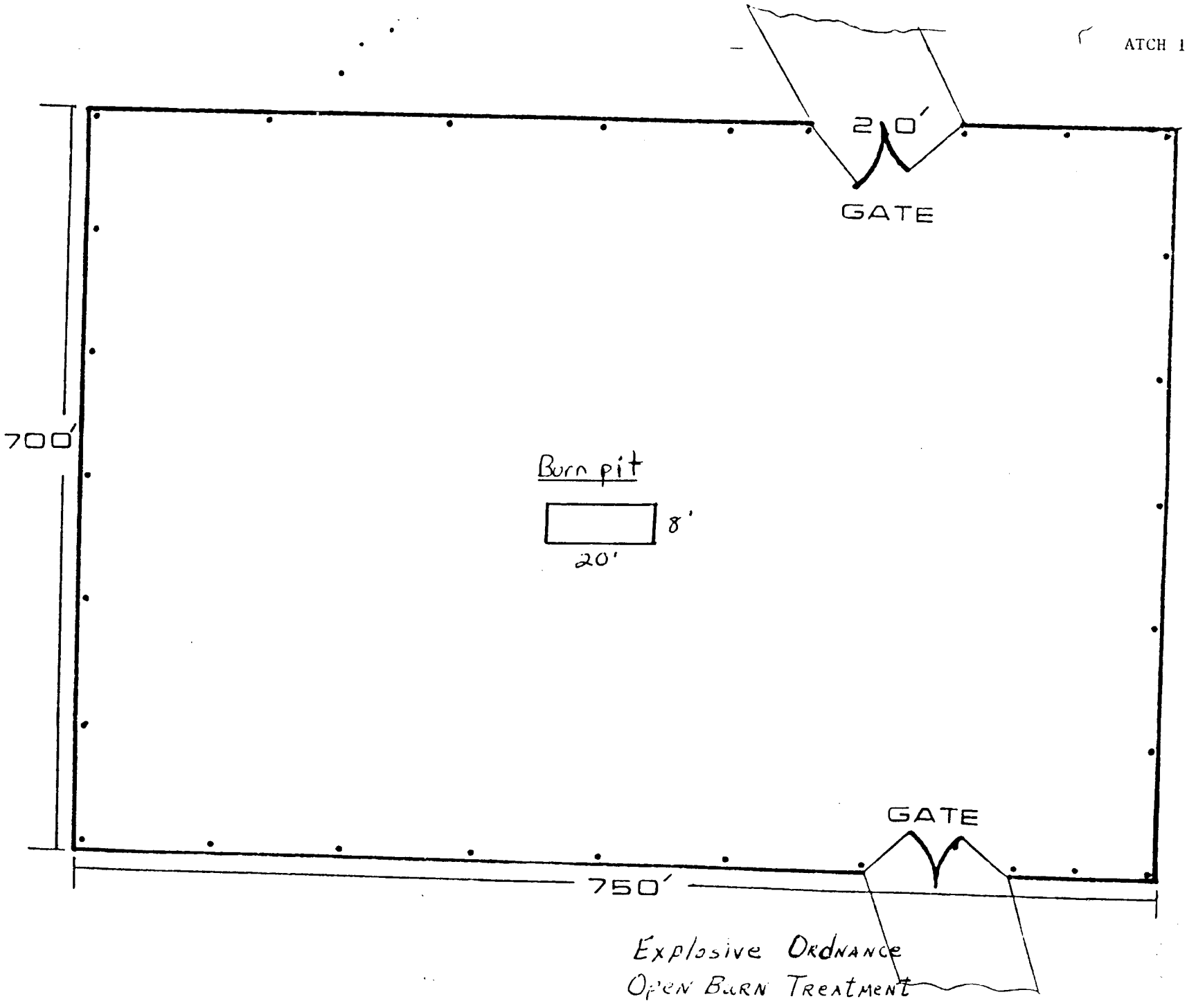
certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached ocuments, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the bmitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, cluding the possibility of fine and imprisonment.

NAME *(print or type)*	B. SIGNATURE	C. DATE SIGNED

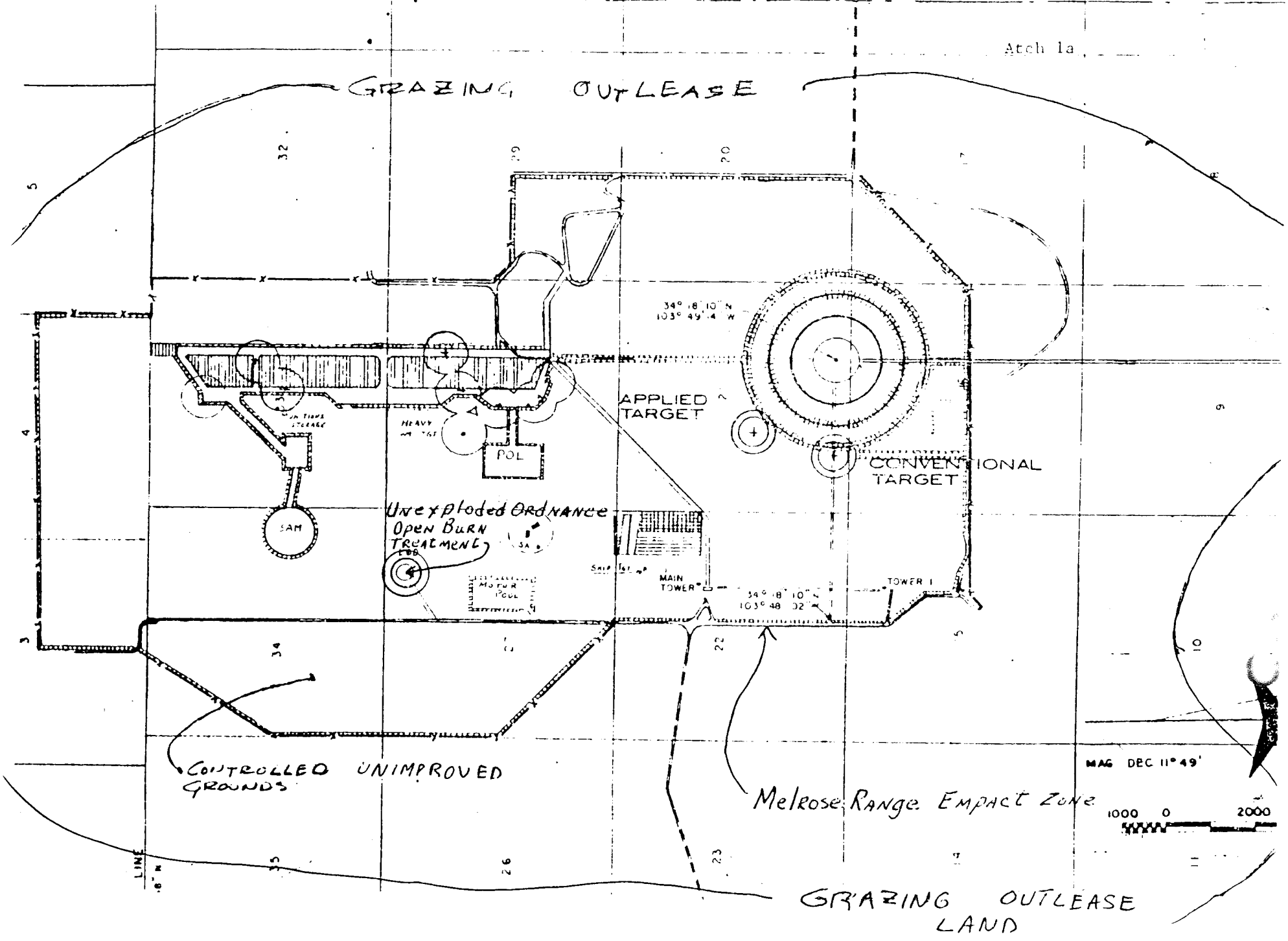
CONTINUE ON PAGE 5

Pictures sent in with original application dated 23 Mar 88.

ATCH 1


20'
GATE
700'
Burn pit
8'
20'
GATE
750'
Explosive Ordnance
Open Burn Treatment

Atch 1a


GRAZING OUTLEASE
APPLIED TARGET
CONVENTIONAL TARGET
POL
SAM
Unexploded Ordnance Open Burn Treatment
MAIN TOWER
TOWER 1
34° 18' 10" N
103° 49' 14" W
34° 18' 10" N
103° 48' 32"
MAG DEC 11° 49'
1000 0 2000
CONTROLLED UNIMPROVED GROUNDS
Melrose Range Empact Zone
GRAZING OUTLEASE LAND

SECTION B

FACILITY DESCRIPTION

B.1 General Description [40 CFR 270.14(b)(1) Guidance; NM HWMR 302.A.4.b(1)(a)]

Melrose Bombing Range

Melrose Bombing Range is located in Roosevelt County, New Mexico, approximately 8 miles southwest of the Village of Melrose, New Mexico, and 25 miles west of Cannon AFB. The location of the range is shown on Figure B-1. It is comprised of approximately 80,000 acres of land, of which 8,790 acres are contained in the impact area and are maintained for exclusive Air Force use. The remaining 71,210 acres serve as a safety zone and are leased to local ranchers for grazing.

The Air Force originally leased 7,771 acres of grassland in early 1952 for use as a bombing and air-to-ground gunnery range. As faster aircraft with more complex weapons systems were introduced, the requirement for larger and more sophisticated range facilities grew accordingly. The range consists of a composite day and night simulated special and conventional weapon delivery range and a day/night tactical range. Live ordnance has not been used at the range since approximately 1969. Ordnance currently used at the range is limited to practice bombs, inert full-scale bombs, inert 2.75 inch rockets, target practice gun ammunition and .50 caliber and smaller live ammunition. The range is used primarily by F-111D aircraft from the 27th Tactical Fighter Wing at Cannon AFB and A-7D aircraft from the 105th Tactical Fighter Group, an Air National Guard unit at Kirtland AFB, New Mexico. The range is also used occasionally by 14 other Air Force, Air Force Reserve, Air National Guard, Navy, and Marine units.

B.2 Topographic Map [40 CFR 270.14(b)(19); NM HWMR4 302.A.4.b.(1)(r)]

Appendix B-1 shows the Melrose Range. The thermal treatment area is indicated, and a distance of 1,000 feet surrounding, at a scale of 1 inch equal to 2,000 feet. Ten-foot contour intervals are shown.

B.2.a General Requirements

B.2.a.(1) Land Uses [40 CFR 270.14(b)(19)(iv); NM HWMR4 302.A.4.b.(1)(r)(iv)]

The closest dwelling to the Melrose Range is located 4.56 miles away on Sundale Road.

B.2.a.(2) Hazardous Waste Management Facility Boundary [40 CFR 270.14(b)(19)(vii); NM HWMR4 302.A.4.b.(1)(r)(vii)]

The thermal treatment area is located 9500 feet from the closest boundary of Melrose Range.

B.2.a.(3) Wind Rose [40 CFR 270.14(b)(19)(v); NM HWMR4 302.A.4.b.(1)(r)(v)]

Figure B-2 illustrates the annual wind rose of meteorological data collected during the period of January 1943 to February 1981 at Cannon AFB.

B.2.a.(4) Access Control [40 CFR 270.14(b)(19)(viii); NM HWMR4 302.A.4.b.(1)(r)(viii)]

The Melrose Range Treatment (open burning of unexploded ordnance) area is surrounded by a five foot high, five strand barbed wire fence. This facility has two gates which are locked at all times except when an open burn is initiated.

B.2.a.(5) Injection and Withdrawal Wells [40 CFR 270.14(b)(19)(ix); NM HWMR4 302.A.4.b.(1)(r)(ix)]

One potable water well is located on the Melrose Range, approximately 12,000 feet from the thermal treatment area.

B.2.a.(6) Buildings, Treatment, Storage, Disposal Areas, and other Structures [40 CFR 270.14(b)(19)(x); NM HWMR4 302.A.4.b.(1)(r)(x)]

The Melrose Bombing Range Open-Burn Treatment Area is approximately 30 feet long by 5 feet wide by 9 feet deep. An area of 250-foot radius around the pit is cleared of grass and brush. A 5 foot high, 5 strand 700 X 750 foot barbed wire fence with two entrance gates has been installed around this facility.

B.2.a.(7) Recreation Areas [40 CFR 270.14(b)(19)(x); NM HWMR4 302.A.4.b.(1)(r)(x)]

No recreation areas are located within 1,000 feet of Melrose Range.

B.2.a.(8) Run-off Control Systems [40 CFR 270.14(b)(19)(x), NM HWMR 302.A.4.b.(1)(r)(x)]

No liquid remains as a result of the burning process at Melrose Range. Empty metal casings are the only residue remaining.

B.2.a.(9) Storm, Sanitary and Process Sewers [40 CFR 270.14(b)(19)(x); NM HWMR4 302.A.4.b.(1)(r)(x)]

No storm or sanitary sewers are located near the thermal treatment area. A septic tank/drainfield system is used for the disposal of domestic waste on Melrose Range.

There are no process sewers located at Melrose Range.

B.2.a.(10) Loading and Unloading Areas [40 CFR 270.14(b)(19)(x); NM HWMR4 302.A.4.b.(1)(r)(x)]

No loading or unloading area exists at the thermal treatment facility.

B.2.a.(11) Fire Control Facilities [40 CFR 270.14(b)(19)(x); NM HWMR4 302.A.4.b.(1)(r)(x)]

A well is located on Melrose Range to provide water for fire control. The Cannon AFB Fire Department remains in the open-burn site area during the burn procedure. After 12 hours, the fire is extinguished if still burning.

B.2.a.(12) Surface Waters [40 CFR 270.14(b)(19)(iii); NM HWMR4 302.A.4.b.(1)(r)iii)]

There are no surface water areas at Melrose Range.

B.2.a.(13) Flood Control/Drainage Barriers [40 CFR 270.14(b)(19)(xi); NM HWMR4 302.A.4.b.(1)(r)(xi)]

Facilities are not located in a floodplain.

B.3 Location Information [40 CFR 270.14(b)(11); NM HWMR4 302A.4.b.(1)(k)]

B.3.a Seismic Considerations [40 CFR 270.14(b)(11)(i) and (ii), 264.18(a) and 264 Appendix VI; NM HWMR4 302.A.4.b.(1)(k)(i) and (ii) and 206.B.8.a.]

The Melrose Range is located in Roosevelt County which does not require seismic data.

B.3.b Floodplain Standard [40 CFR 270.14(b)(11)(iii) and 264.18(b); NM HWMR4 302.A.4.b.(1)(k)(iii) and 206.B.8.b]

Melrose Range is not located in the 100-year floodplain. The Range,

LOCATION MAPS

however, is not included in a National Flood Insurance Program and there are no Flood Insurance Rate Maps available.

B.4. Traffic Information [40 CFR 270.14(b)(10); NM HWMR4 302.A.4.b.(10(j)]

Outdated and/or excess munitions are transported to the Melrose Range once per month. These shipments are generally 15 to 20 pounds and are transported by pick-up or 1-1/2 ton trucks, diesel or gas, meeting the requirements for vehicles carrying explosives. (DOT? MILITARY?)

TRAFFIC DATA

B.4.a Traffic Control [40 CFR 270.14(b)(10); NM HWMR4 302.A.4.b.(1)(j)]

The Melrose Range is located approximately 25 miles from Cannon AFB. Shipments from the base use Route 84 and turn left on Route 88 east of Melrose, NM.

B.4.b Access Road Surfacing [40 CFR 270.14(b)(10); NM HWMR4 302.A.4.b.(1)(j)]

All access roads to Melrose Range are asphalt surfaced, generally with 1-1/2 to 2 inches of hot mix asphaltic concrete.

B.4.c Load-Bearing Capacity [40 CFR 270.14(b)(10); NM HWMR4 302.A.4.b.(1)(j)]

All access routes to Melrose Range are capable of handling pickup trucks carrying unexploded munitions.

B.4.d Traffic Control Signals [40 CFR 270.14(b)(10); NM HWMR4 302.A.4.b.(1)(j)]

When leaving the Melrose Range, a stop sign is located at the intersection of Sundale Road and Route 88, and at the intersection of Route 88 and Route 84.

Figure B-1

Location Map of Cannon AFB and
Melrose Bombing Range

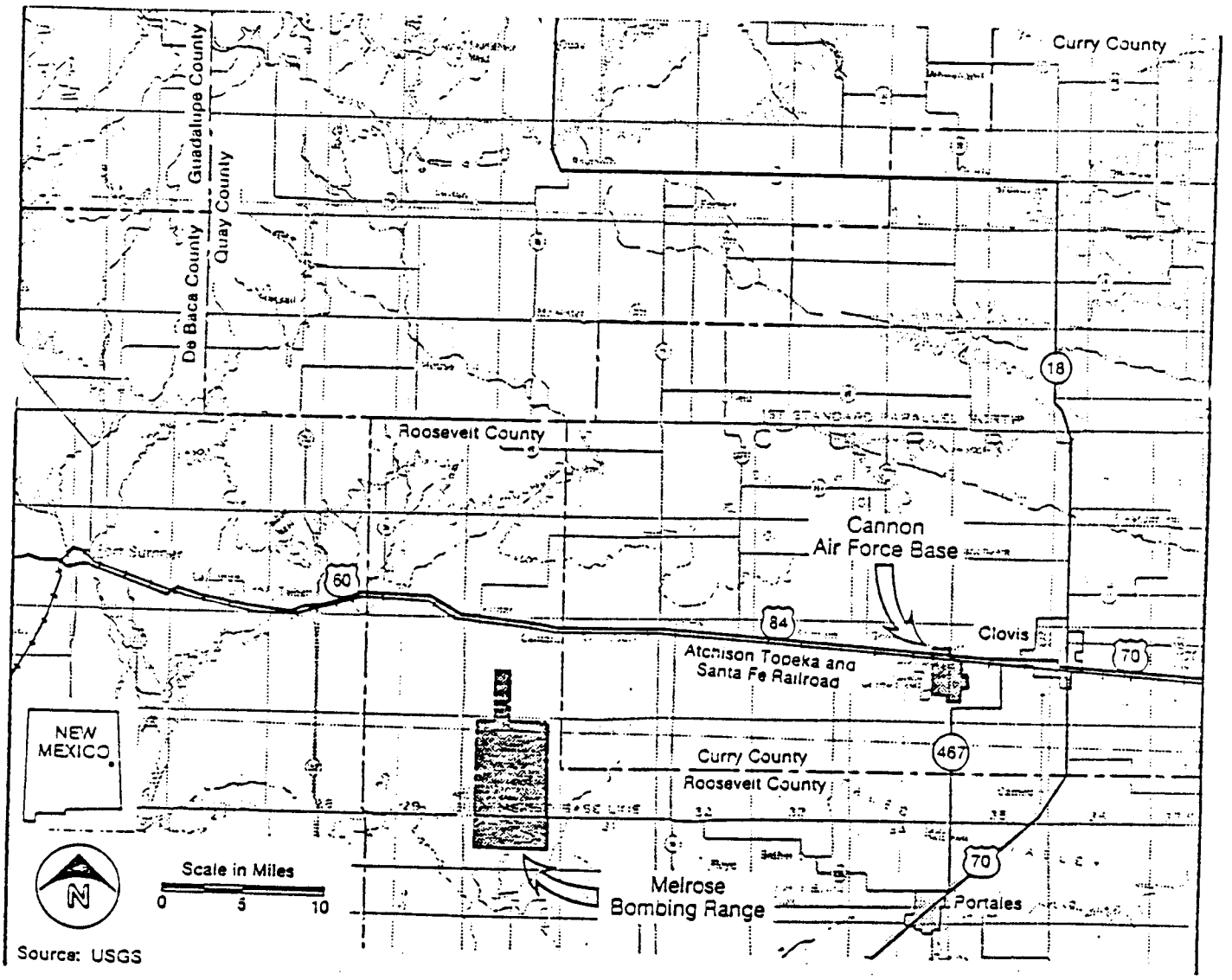
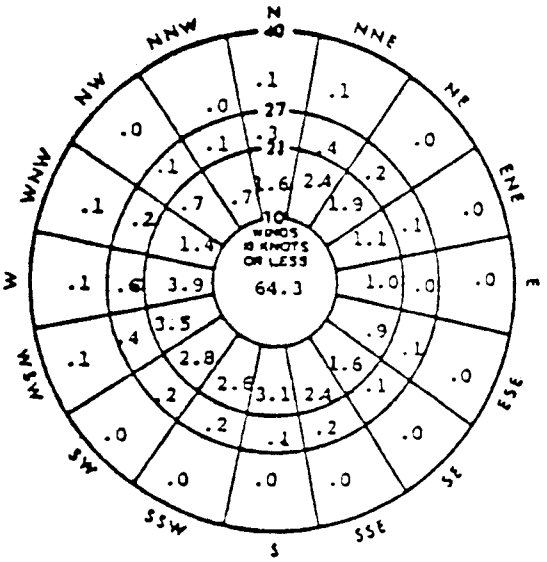
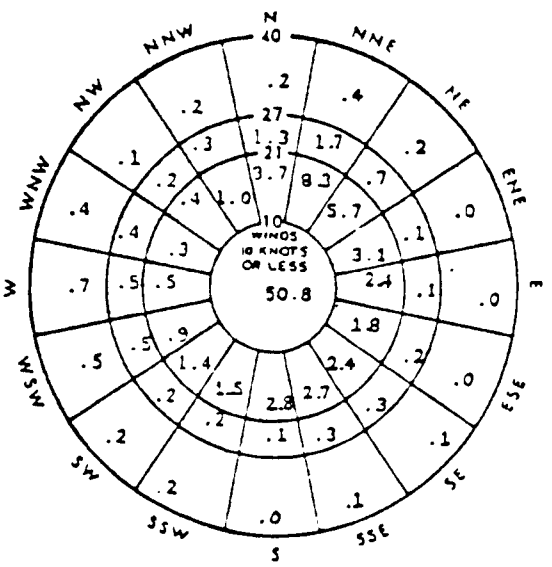


Figure B-2

Annual Wind Roses



ALL WEATHER



INSTRUMENT

These wind roses show the total percent of winds by speed group and direction based on true bearing.

SECTION C

WASTE CHARACTERISTICS

A description of munitions disposed of on the Melrose Range and sampling that has been performed is included in this section. All of the following information is submitted in accordance with the requirements of 40 CFR 270.14(b)(2) and (3) and NM HWMR4 302.A.4.b.(1)(b) and 1(c).

C.1 Chemical and Physical Analyses [40 CFR 270.14(b)(2), 264.13(a), 270.62(b)(2)(i); NM HWMR4 302.A.4.b.(1)(b)]

Appendix C-1 lists the munitions that may be found during clearance of the Melrose Range.

The burning of munitions on the Melrose Range will result in complete combustion of any hazardous components. Soil samples have been taken in this area, but were analyzed for organics only. A laboratory report is included as Appendix C-2. Further sampling will include additional parameters, such as EP toxicity.

C.1.a Containers (Guidance) [40 CFR 270.15(a), 264.275(a); NM HWMR4 302.A.4.b.(2)(a), 206.D.4.f.]

This facility will not utilize containers for hazardous waste.

C.1.b Tanks (Guidance) [40 CFR 270.16, 264.190(a); NM HWMR4 302.A.4.b.(2)(b), 206.D.5.a.(1)]

This facility will not utilize storage tanks.

C.1.c Wastes Piles (Guidance) [40 CFR 270.18, 264.250(a); NM HWMR4 302.A.4.b.(2)(d), 206.D.7.a.(1)]

No wastes piles will be maintained at this facility.

C.1.d Surface Impoundments (Guidance) [40 CFR 270.17(a), NM HWMR4 302.A.4.b.(2)(c)(i)]

This facility has no surface impoundments.

C.1.e Incinerators [40 CFR 270.62(b)(2)(i); NM MWMR4 302.E.2.b.(2)(a)]

No wastes will be incinerated at this facility; therefore, Sections C-1e(1) and (2) are not applicable.

C.1.f Landfills (Guidance) [40 CFR 270.21, 264.300; NM HWMR4 302.A.4.b.(2)(g), 206.D.10.a.]

No landfill will be maintained at this facility.

C.1.g Land Treatment (Guidance) [40 CFR 270.20, 264.270; NM HWMR4 302.A.4.b.(2)(i), 206.D.9.a.]

No land treatment units will exist at this facility.

C.1.h Additional Requirements for Land Storage, Treatment and Disposal Facilities [40 CFR 270.14(c); NM HWMR4 302.A.4.b.(3)]

None required.

C.2 Waste Analysis Plan [40 CFR 264.13(b) and (c) and 264.341; NM HWMR4 206.B.3.b. and c. and 206.D.8.b.]

Melrose Bombing Range stores and treats hazardous waste in the course of routine operations. The intent of this waste analysis plan is to summarize the manner in which hazardous materials will be analyzed for chemical/physical characteristics to insure proper treatment in accordance with New Mexico Hazardous Waste Management Regulations.

Explosive Ordnance Disposal is the organization tasked with the disposal of waste explosives. The explosives become wastes because the shelf life of the material expires or because of damage to the package. As routine

inspections are conducted in the bomb storage area (called bomb dumps; where the materials are stored) outdated or damaged materials are transported to the Melrose Range for disposal.

The waste explosives are destroyed by burning in a pit located at Melrose Range. The wastes are placed in the pit and ignited using diesel fuel and wood as ignition sources.

C.2.a Parameters and Rationale [40 CFR 264.13(b)(1); NM HWMR4 106.B.3.b.(1)]

C.2.a.(1) Analysis Parameters (Identity Unknown)

All samples submitted will first be screened using infrared identification. This test will give major components and classify the waste as solvent or non-solvent. If the substance is identified as a solvent, one of two methods will be used. Gas Chromatograph/infrared separation analysis will be used for mixtures IAW Section 8.1 of EPA Publication SW 846 "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods" followed by infrared confirmation. Section 8.2 (Gas Chromatograph/Mass Spectrometry) methods will be used on other solvents.

Ignitability will also be performed on all wastes (solvent and non-solvent) using a Fisher tag closed cup tester (Pensky-Martens type) according to method 1010 listed in SW 846, Section 2.1.1.

If the infrared screen indicates that the waste material is an acid or base, Corrosivity (pH) tests will be performed on the substance in accordance with Section 2.1.1. of SW 846.

Tests for reactivity will be performed on all wastes IAW SW 846 Section 2.1.3.

An EP Toxicity Test (metals only) will be performed on all wastes IAW SW 846 Section 2.1.4.

If the infrared identification test does not adequately quantify the waste constituents a sample will be resubmitted. An EPA approved method for further quantification will then be performed. Refer to Figure C-1 for a flow chart description of the identification process.

C.2.a.(2) Analysis Parameters (Known). The analysis parameters will be determined based upon the quantitative analysis outlined in Section A above. Appendix C-3 shows the sampling parameters and the rational for those parameters for specific operations which generate wastes that require analysis. Results of samples analyzed according to the selected parameters are contained in Appendix C-3.

C.2.b. Test Methods. Specific methods for analysis of wastes generated by base organizations are listed in Appendix C-3.

C.2.c. Sampling Methods. Soil samples will be taken using the split spoon method.

C.2.d. Sampling Frequency. The Melrose burn pit will be sampled following each year of use.

C.2.e. Chain of Custody. Samples will be sent to USAF OEHL in sealed container. A Chain-of-Custody record (figure C-2) will be filled out, signed and placed in a plastic bag along with the usual sample submission form (see figure C-3) and sealed in the shipping container. A duplicate will be kept by SGPB with the duplicates of the sample submission forms. OEHL personnel will acknowledge receipt of the samples in good condition by signing the

Chain-of-Custody form and returning it to Cannon AFB. If the container is damaged in any way or not sealed when the lab receives the package, the technician will so annotate on the form.

C.2.f. Record Keeping. Sample results (along with Chain-of-Custody forms) will be maintained at SGPB and copies will be kept by the generator, Environmental Coordinator (DEV), and by the Defense Reutilization and Marketing Office (DRMO) in accordance with Section XIII (Record Keeping Requirements) of the base Hazardous Waste Management Plan.

C.2.g. Additional Requirements for Facilities Handling Ignitables, Reactive, or Incompatible Waste [40 CFR 264.13(b)(6) and 264.17; NM HWMR 206.B.3.b.(6) and 206.B.7.]

No additional testing of ignitable, reactive, or incompatible hazardous waste is necessary because DOD turn-in requirements and the Waste Analysis Plan (as described in Section C-2) provide the necessary information to properly store ignitable and reactive wastes and prevent the mixing of incompatible wastes. Precautions to prevent the accidental ignition or reaction of ignitable, reactive, or incompatible wastes are described in Section F-5 of this permit application.

FIGURE C-1

IDENTIFICATION PROCESS FLOW CHART

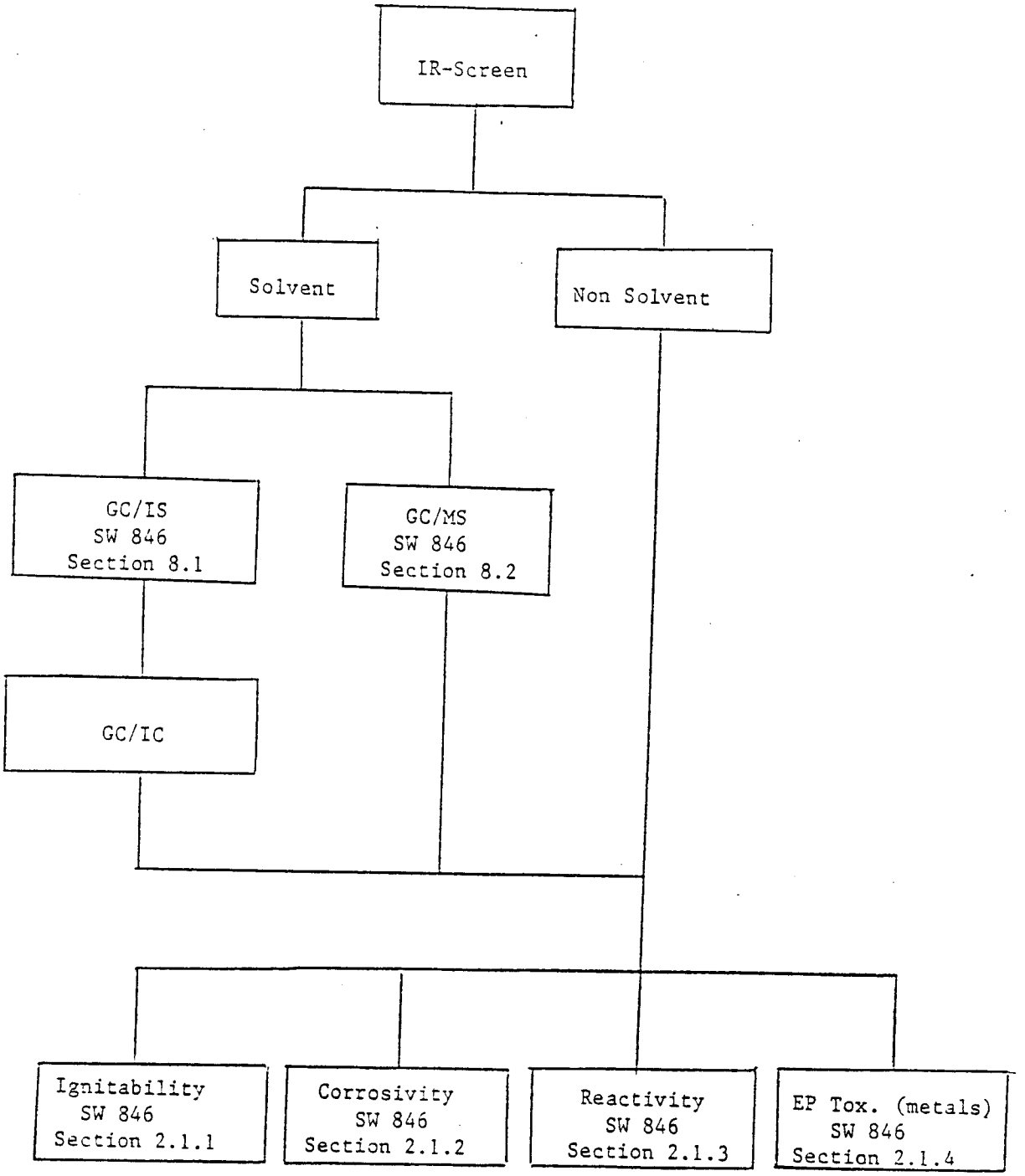


Figure C-2

Chain-of-Custody Record

Figure A-2 Chain-of-Custody Record

Survey | **Samplers:** *Signature*

Station Number	Station Location	Date	Time	Sample Type Water Comp	Sample Type Water Grab	Sample Type Air	Seq. No	No. of Containers	Analyses Required

Relinquished by: *Signature*	Received by: *Signature*	Date/Time
Relinquished by: *Signature*	Received by: *Signature*	Date/Time
Relinquished by: *Signature*	Received by: *Signature*	Date/Time
Relinquished by: *Signature*	Received by Mobile Laboratory for Field analysis: *Signature*	Date/Time
Dispatched by: *Signature* — Date/Time	Received for Laboratory by:	Date/Time

Method of Shipment:

Distribution: Orig.—Accompany Shipment
1 Copy—Survey Coordinator Field Files

Figure C-3

Sample Submission Form

BULK MATERIAL SAMPLING DATA

(Use this space for mechanical imprint)

OEHL USE ONLY

WORKPLACE OR SITE IDENTIFIER

BASE

ORGANIZATION

WORKPLACE OR SITE

DATE COLLECTED (YYMMDD)

BLDG NO/LOCATION

ROOM/AREA

MAIL REPORTS TO (circle if change)

ORIGINAL	
COPY 1	
COPY 2	

SAMPLE COLLECTED BY (Name, Grade, AFSC)

SIGNATURE

AUTOVON

REASON FOR SUBMISSION

A-ACCIDENT/INCIDENT C-COMPLAINT F-FOLLOWUP/CLEANUP
R-ROUTINE BACKGROUND/PERIODIC SURVEY O-OTHER

OEHL FILE

SOURCE BEING SAMPLED

EXISTING CONTROLS (Personal protective equipment, Engineering, Administrative)

SAMPLE COLLECTION DATA

OEHL SAMPLE NUMBER			
BASE SAMPLE NUMBER			
ANALYSES REQUESTED	A	CHECK FOR	☐ MAJOR COMPONENTS / ☐ MAJOR COMPONENTS
	B	NAME	
		NIOSH NO	
	C	NAME	
		NIOSH NO	
	D	NAME	
		NIOSH NO	
	E	CHECK FOR	☐ HAZARDOUS/TOXIC WASTE / ☐ HAZARDOUS/TOXIC WASTE
MATERIAL NAME			
LOT NUMBER			
NSN / FSN)			
SPECIFICATION (MIL or FED)			
MANUFACTURER'S NAME			
DESCRIPTION OF MATERIAL USAGE (Heated, blended, removed, etc)			
SUPPORTING SAMPLES		OEHL SAMPLE NO	
		BASE SAMPLE NO	
		SAMPLE TYPE	

COMMENTS

AF FORM JAN 81 2751

SECTION D

PROCESS INFORMATION

The information provided in this section is submitted in accordance with the requirements of 40 CFR Parts 270.15 and 264.170-176; and NM HWMR4 302.A.4.b.(2)(a) and 206.D.4.a through 206.D.4.g.

D.1 Containers [40 CFR 264.171; NM HWMR4 206.D.4.b]

Hazardous waste is not containerized at this facility; therefore, Section D.1 is not applicable.

D.2 Tanks [40 CFR 270.16; NM HWMR4 302.A.4.b.(2)(b)]

No tanks will be used for hazardous waste storage at DRMO-Cannon; therefore, Section D.2 is not applicable.

D.3 Waste Piles [40 CFR 270.18; NM HWMR4 302.A.4.b.(2)(d)]

No waste piles will be used at this facility; therefore, Section D.3 is not applicable.

D.4 Surface Impoundments [40 CFR 270.17; NM HWMR4 302.A.4.b.(2)(c)]

No surface impoundments exist at Melrose Range; therefore, Section D.4 is not applicable.

D.5 Incinerators [40 CFR 270.19; NM HWMR4 302.A.4.b.(2)(e)]

No incinerators will be used at this facility; therefore, Section D.5 is not applicable.

D.6 Landfills [40 CFR 270.21; NM HWMR4 302.A.4.b.(2)(q)]

Section D.6 is not applicable.

D.7 Land Treatment [40 CFR 270.20; NM HWMR4 302.A.4.b.(2)(f)]

There will be no land treatment of hazardous wastes; therefore, Section D.7 is not applicable.

D.8 Thermal Treatment [40 CFR 265.382; NM HWMR4 206.C.11.f.]

Munitions to be disposed of on Melrose Range are either expended items collected during range clearance or outdated/defective items from Cannon AFB. Procedures for range decontamination and disposal of munitions (CAFB Regulation 136-18) are included in Appendix D-1.

Items transported to the range from the base will be packaged in containers of equal or greater strength than those described in 49 CFR Part 173 Subpart C - Explosives and Blasting Agents; Definition and Preparation. Appendix D-2 includes Chapter 7 of AF Regulation 127-100, "Explosives Safety Standards," which describes procedures for the safe transportation of explosive materials.

Disposal will be accomplished by burning in a pit 5 feet wide by 25 feet long by 9 feet deep.

Munitions to be burned will be examined carefully to make certain that no removable detonators or blasting caps are included. All removable detonators, blasting caps, etc., will be removed from munitions to be burned to avoid unexpected detonation.

Combustible material, such as scrap wood, will be placed in the bottom of the pit, approximately 1 foot deep. Munitions will be placed on combustible material, ensuring that the combustible material extends beyond the layer of munitions. Layers of munitions and combustible material will be formed as necessary, allowing an air space of approximately 1 foot between the top layer of munition and the top of the pit. Fifty to 100 gallons of diesel

fuel will be poured over the pile, an ignition train prepared, and ignition effected.

Sites will not be left unattended during burning, but will be observed from the specified safety distance. The fire will be allowed to burn for 12 hours. If it has not burned out in that amount of time, it will be extinguished by the Fire Department.

After a period of at least 12 hours, items are removed from the pit and spread over an area in order to inspect for unburned or partially burned munitions. These items will be returned to the pit for disposal at the next scheduled burning time.

The maximum amount of explosives that can be disposed of on Melrose Range is 100 pounds. Most operations involve the disposal of 15-20 pounds.

Range clearance is performed on a monthly, annual, and five-year schedule. Monthly clearance is on the third Saturday of each month, annual clearance is done in April, and the next five-year clearance will be in 1991.

No liquid wastes are disposed of on Melrose Range, and the fuel used for ignition is completely burned. Rainfall in the area is 14 inches per year. These factors virtually eliminate the possibility of liquid accumulation in the burning trench.

The thermal treatment area is located 9500 feet inside the boundary of Melrose Range.

A copy of the operational procedures for the Melrose Thermal Treatment Area is included as Appendix D-3.