



DEPARTMENT OF THE AIR FORCE

HEADQUARTERS 27TH COMBAT SUPPORT GROUP (TAC)

CANNON AIR FORCE BASE, NM 88103



18 NOV 1991

Mr. Benito Garcia, Chief
Hazardous & Radioactive Materials Bureau
New Mexico Environment Department
1190 St. Francis Drive
Santa Fe, NM 87502

RE: Notice of Deficiency, dtd 11 Oct 91
Cannon AFB, NM5572124456

Dear Mr. Garcia

Cannon AFB received your Notice of Deficiency regarding the Melrose AFR permit application on 17 Oct 91. The responses to each of your concerns are listed below.

1. Map Requirements

- a. Melrose AFR is approximately 60,400 acres. The requirement to provide a map of this area at a scale of 1":200' would take up over 450 square feet of paper. We believe that this requirement is excessive and goes beyond the intent of the regulation. As noted at the end of 40 CFR 270.14(B)19, "For large HWM [Hazardous Waste Management] facilities the Agency will allow the use of other scales on a case by case basis." We request that you accept the 1':2000' scale map for the entire facility (Map 1). Additionally, we have provided a map of the impact area at a scale of 1":1000' (Map 2). This map has been updated to accurately show the surrounding buildings and roads.
- b. The land which surrounds Melrose AFR is primarily rangeland. A small portion on the east side is used for cropland. The neighboring landuse patterns have been color coded along the boundary of Melrose AFR on Map 3.
- c. The only buildings within a two mile radius of the unit are the range management offices, the control tower, the fire station and the range targets. These facilities are shown on Map 2.
- d. Prior to submitting our permit application in December 1990 we made several attempts to find maps demonstrating that the OB/OD unit is not located in the 100 year floodplain. Initially we contacted area insurance agents. After unsuccessfully following up on several leads, including the Soil Conservation Service, we contacted the Corps of Engineers. They indicated that there were not any maps available because this area does not have a National Flood Insurance Program. The Corps indicated that they could do a Flood Hazard Evaluation, but that it would cost close to \$10,000. Based on this information and the fact that the contour map (Map 1) clearly shows

Readiness is our Profession

that the unit is not in a low lying area and that rainfall flows northeast, past the unit, we request that you consider waiving this requirement. We feel that there are better ways to allocate our limited Environmental Compliance Program budget.

2. Traffic Patterns

a. There are three groups of people that use vehicles on Melrose AFR. The ranchers who lease Air Force property in the buffer zone may have up to eight pick up trucks on the range on any given day. ARCATA, the company which manages the impact area, uses the following vehicles:

- 3 - King cab pickup trucks, everyday
- 1 - Grader, twice a week
- 1 - Tractor, twice a week
- 1 - Backhoe, five days a week
- 1 - Ten ton dump truck, twice a week

Explosive Ordinance Disposal (EOD) personnel use one king cab, one half ton truck, one dump truck and one personnel mover with a trailer when bringing waste explosives to the OB/OD unit.

b. The following is a list of typical waste explosives and their corresponding net explosive weight:

Smokeless powders/propellants	10 lbs.
High explosives	3 lbs.
Initiating explosive	1 lb.
Incendiaries	3 lbs.
Pyrotechnic explosives	3 lbs.

Dud fired practice bombs which are gathered off of the range are also detonated at the unit. Approximately 150 bombs with a net explosive weight of 3 lbs., are collected and treated monthly.

c. Access to the impact area is controlled by a series of three gates which are ^{un}locked between the hours of 06:30 AM and 11:30 PM on weekdays. They are locked at all times on the weekend unless a special exercise is taking place. Access to the buffer zone cannot be controlled. Five county roads pass through various parts of the buffer zone.

d. A map showing the intersection of Ranchvale Road and Route 60 is included with this submittal (Map 4).

e. The route used by EOD to transport the waste explosives is highlighted on Map 2. The road leading up to the range management office is paved asphalt. The roads which lead from the office to the OB/OD unit are dirt. These roads, which also serve as fire breaks, are maintained by ARCATA.

3. Waste Analysis

- ✓ Prior to shipping any waste explosives to Melrose AFR the shipment is inspected and compared to the disposal records to insure that the items being destroyed are properly listed on the record. Immediately prior to shipment, the hazardous waste manifest is reviewed for accuracy. The containers are also checked to insure that the Hazardous Waste label is properly filled out and securely attached.

4. Contingency Plan

- ✓ a. The Melrose AFR fire house is located about 250' northeast of the range tower, as shown on Map 2. There are two fire trucks and two crews on duty 24 hours a day. Additionally, there is a 60 person auxiliary force at Cannon AFB.
- ✓ b. The contingency plan as written in the permit application is maintained by Environmental Management and EOD. The contingency plan summarizes several other widely distributed plans. The Fire Department follows Operations Plan 92-1, which details the procedures for responding to a fire at Melrose AFR. Due to the nature of waste explosives, EOD personnel have their own guidance on how to respond to various contingencies. Lastly, the command structure is outlined in Cannon AFB's Spill Prevention and Response Plan. This plan is maintained by over 50 organizations on base. All commanders, spill response team members and emergency coordinators maintain a current copy of this plan.

5. Hazard Prevention

The primary hazards involved with loading and unloading waste explosives are a potential fire and the possibility of dropping the explosives. A detailed discussion of the hazards associated with transporting waste explosives can be found in Appendix D-1, Chapter 7 of "Explosive Safety Standards, Air Force Regulation 127-100." Additional information is provided in Appendix F-1, Section I of "General Instructions for Disposal of Conventional Munitions."

*In the Part B
last page* →

We hope that the above information will complete our permit application. Please contact Lt Gregg Demers or Mr. Jim Richards (784-4639) if you require any additional information.

Sincerely



DAVID E. BENSON, Colonel, USAF
Commander

4 Atch

1. Map 1 - Melrose AFR (1":2000')
2. Map 2 - Impact Area (1":1000')
3. Map 3 - Land Use Patterns
4. Map 4 - Intersection

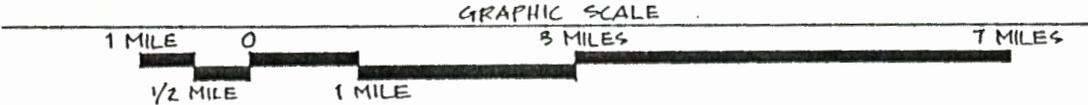
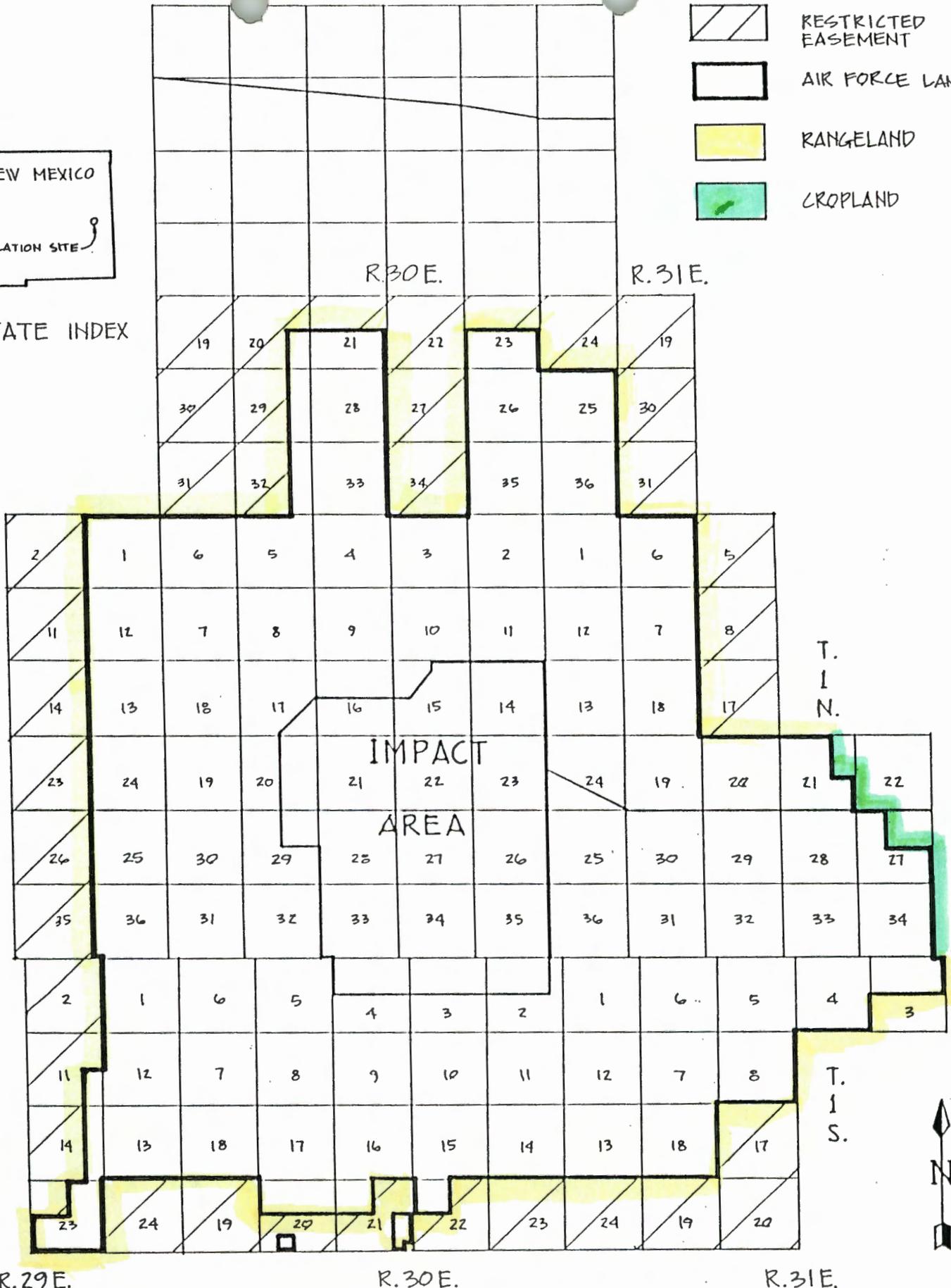
cc: Mr. Richard Mayer, EPA

MELROSE AIR FORCE RANGE

-  RESTRICTED EASEMENT
-  AIR FORCE LAND
-  RANGELAND
-  CROPLAND

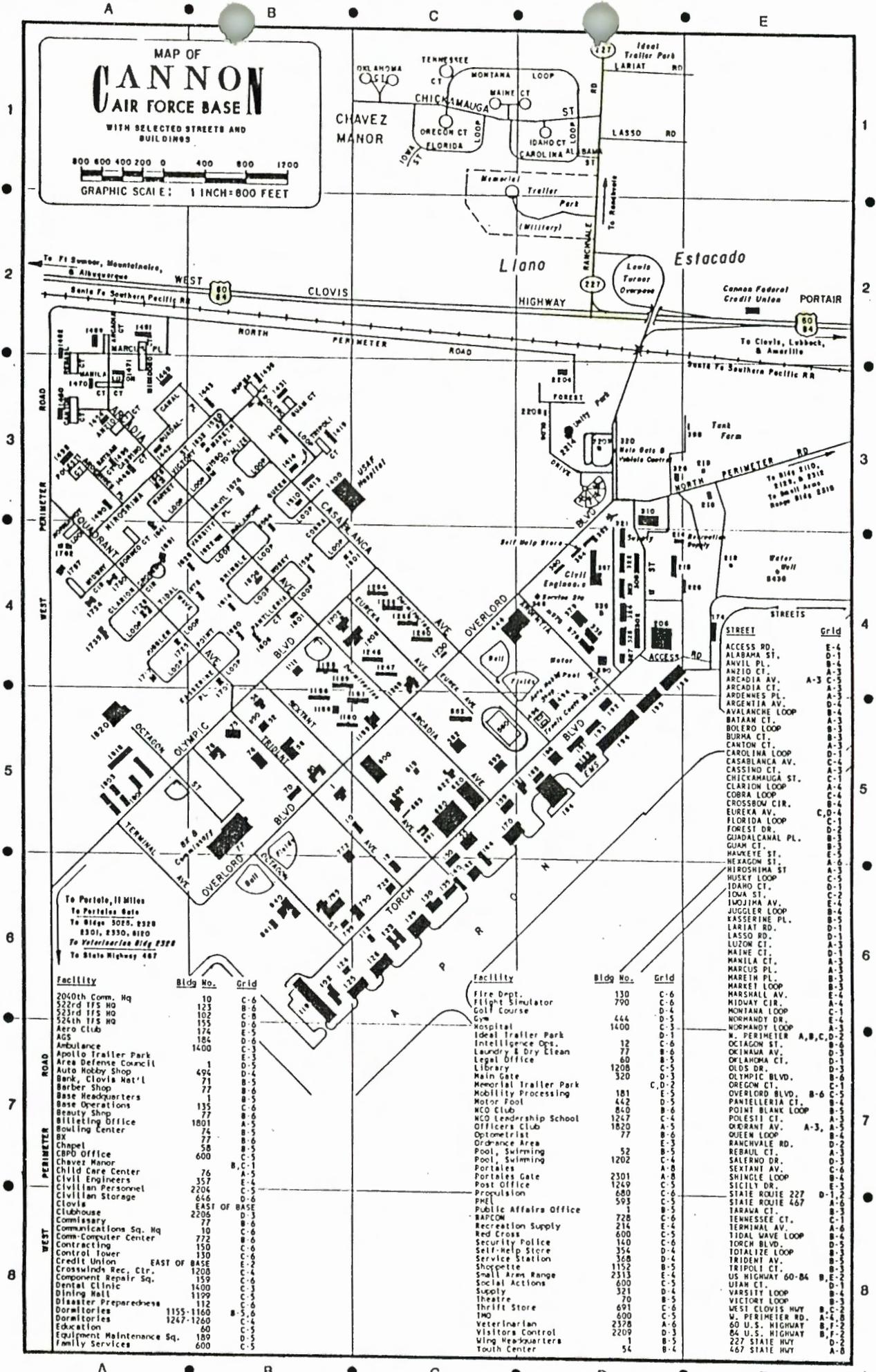


STATE INDEX



MAP OF CANNON AIR FORCE BASE

WITH SELECTED STREETS AND BUILDINGS



To Perote, 11 Miles
To Pecos, 10 Miles
To Biggs 3028, 3228
3301, 3330, 3120
To Veterans Bldg 3338
To State Highway 487

Facility	Bldg No.	Grid
2040th Com. Hq	10	C-6
322rd IFS HQ	123	B-6
323rd IFS HQ	102	C-8
324th IFS HQ	135	D-6
Aero Club	174	E-5
AGS	184	D-6
Ambulance	1400	E-3
Apollo Trailer Park	1	D-5
Area Defense Council	494	D-4
Auto Hobby Shop	71	B-5
Bank, Clovis Nat'l	77	B-6
Barber Shop	77	B-5
Base Headquarters	135	C-6
Base Operations	77	B-6
Beauty Shop	1801	A-3
Billing Office	76	B-5
Bowling Center	77	B-6
BX	58	C-5
Chapel	600	B-3
CBPD Office	600	C-5
Chavez Manor	76	B-1
Child Care Center	76	A-5
Civil Engineers	357	E-4
Civilian Personnel	2204	C-5
Civilian Storage	646	D-6
Clovis	646	D-6
Clubhouse	2206	D-3
Commissary	77	B-6
Communications Sq. Hq	10	B-6
Comm-Computer Center	772	B-6
Contracting	150	C-6
Control Tower	150	C-6
Credit Union	1208	C-4
Crosswinds Rec. Ctr.	1208	C-4
Component Repair Sq.	159	C-6
Dental Clinic	1400	C-3
Dining Hall	1199	C-3
Disaster Preparedness	112	C-6
Dormitories	1155-1160	B-5,6
Dormitories	1247-1260	C-4
Education	60	C-5
Equipment Maintenance Sq.	189	D-5
Family Services	600	C-5

Facility	Bldg No.	Grid
Fire Dept.	130	C-6
Flight Simulator	790	C-6
Golf Course	D-4	D-4
Cym	444	D-5
Hospital	1400	C-5
Ideal Trailer Park	12	D-1
Intelligence Ops.	77	B-6
Laundry & Dry Clean	60	B-5
Legal Office	1208	C-5
Library	320	D-3
Main Gate	181	E-5
Memorial Trailer Park	442	D-5
Mobility Processing	840	B-6
Motor Pool	1247	C-4
NCO Club	1820	A-5
NCO Leadership School	77	B-6
Officers Club	52	B-5
Optometrist	1202	C-4
Ordnance Area	2301	A-8
Pool, Swimming	1249	C-5
Portales	680	C-6
Portales Gate	593	B-5
Post Office	728	C-6
Propulsion	214	E-4
PNE	600	C-5
Public Affairs Office	140	C-6
RAPCON	354	D-4
Recreation Supply	368	D-4
Red Cross	1152	B-5
Security Police	213	E-4
Self-Help Store	600	C-5
Service Station	321	D-4
Shoppette	70	E-5
Signal Area Range	691	C-5
Social Actions	600	C-5
Supply	70	E-5
Theatre	691	C-5
Thrift Store	2208	A-6
IMO	2208	A-6
Veterinarian	1	B-3
Wing Control	54	B-4
Wing Headquarters	54	B-4
Youth Center	54	B-4

STREET	Grid
ACCESS RD.	E-4
ALABAMA ST.	D-1
ANVIL PL.	B-4
ARZIO CT.	A-3
ARCADIA AV.	C-5
ARCADIA CT.	A-3
ARDENNES PL.	A-3
ARGENTIA AV.	A-3
AVALANCHE LOOP	B-4
BATAAN CT.	A-3
BOLERO LOOP	B-3
BURMA CT.	B-3
CANTON CT.	A-3
CAROLINA LOOP	D-1
CASABLANCA AV.	C-4
CASSINO CT.	A-3
CHICKAMAUGA ST.	C-1
CLARION LOOP	A-4
COBRA LOOP	C-4
CROSSBOW CIR.	D-2
EUREKA AV.	C-4
FLORIDA LOOP	C-1
FOREST DR.	D-2
GUADALCANAL PL.	B-3
GUAN CT.	B-3
HAWKEYE ST.	E-5
HEXAGON ST.	A-6
HIROSHIMA ST.	C-5
HUSKY LOOP	C-1
IDAHO CT.	D-1
IONA ST.	C-2
140JIMA AV.	B-4
JUGGLER LOOP	B-4
KASSERINE PL.	B-5
LARIAT RD.	D-1
LIASSO RD.	D-2
LUZON CT.	A-3
MAINE CT.	D-1
MANILA CT.	A-3
MARCUS PL.	B-5
MARETH LN.	B-5
MARKET LOOP	B-3
MARSHALL AV.	E-4
MIDWAY CIR.	A-4
MONTANA LOOP	B-4
NORMANDY DR.	E-4
NORMANDY DR.	A-3
OCAGON ST.	B-6
OKINAWA AV.	D-2
OKINAWA CT.	D-3
OLYMPIC BLVD.	B-6
OREGON CT.	C-1
OVERLORD BLVD.	B-6
PANTELLERIA CT.	B-4
POINT BLANK LOOP	B-4
POLESTI CT.	A-3
QUADRANT AV.	A-3
QUEEN LOOP	A-5
RANCHVILLE RD.	B-4
REBAUL CT.	A-3
SALERMO DR.	D-3
SEXTANT AV.	C-6
SHINGLE LOOP	B-4
SICILY DR.	E-3
STATE ROUTE 227	D-1
STATE ROUTE 467	A-6
TARAWA CT.	B-5
TENNESSEE CT.	B-1
TERMINAL AV.	A-6
TIDAL WAVE LOOP	B-4
TORCH BLVD.	D-3
TOTALIZE LOOP	D-3
TRIDENT AV.	B-5
TRIPLI CT.	B-3
US HIGHWAY 60-B4	B-1
UTAH CT.	B-4
VARSITY LOOP	B-4
VICTORY LOOP	B-3
WEST CLOVIS HWY	B-3
W. PERIMETER RD.	A-4
60 U.S. HIGHWAY	B-1
84 U.S. HIGHWAY	B-1
227 STATE HWY	D-2
467 STATE HWY	A-8

**TO VIEW THE MAP AND/OR
MAPS WITH THIS DOCUMENT,
PLEASE CALL THE
HAZARDOUS WASTE BUREAU
AT 505-476-6000 TO MAKE AN
APPOINTMENT**