



BRUCE KING  
GOVERNOR

State of New Mexico  
**ENVIRONMENT DEPARTMENT**  
Harold Runnels Bulding  
1190 St. Francis Drive, P.O. Box 26110  
Santa Fe, New Mexico 87502  
(505) 827-2850

JUDITH M. ESPINOSA  
SECRETARY

RON CURRY  
DEPUTY SECRETARY



**CERTIFIED MAIL**  
**RETURN RECEIPT REQUESTED**

P 757 743 285

December 9, 1991

Mr. Jim Richards, Chief  
Environmental Management  
Cannon Air Force Base  
Headquarters 27th Combat Support Group DEEV  
Cannon Air Force Base, New Mexico

RE: Reference to the 10/91 Administrative Review Notice of  
Deficiency - Additional information needed  
NM 557214456

Dear Mr. Richards,

On October 11, 1991 the New Mexico Environment Department (NMED) sent a Notice of Deficiency for the Melrose Air Force Range (AFR) Resource Conservation and Recovery Act (RCRA) Part B application. Your response, received on November 21, was reviewed and found to address all comments in the Notice. However, based on your response, it was determined that additional information is needed. Regulations cited below are from the New Mexico Hazardous Waste Regulations (HWMR-6), Part IX, 40 CFR §270.10(c) and §270.14. The numbering system in your response has also been used here to facilitate ease in referencing areas of concern.

1d. 270.14(b)(11)(iii) Facility Location Information.

Additional information is needed to help document that the Open Detonation/Open Burn (OB/OD) Unit is not within the 100 year flood plain. In addition to your statements that the Unit is not in a low lying area and that the drainage is to the northeast, supply other verifiable support data, such as characteristics of the drainage basin into which drainage flows. Other data can be obtained from the U.S. Soil Conservation Service

Mr. Richards  
December 9, 1991  
Page 2

and the New Mexico State Highway Department (NMSHD) in Santa Fe.

2b. 270.14(b)(2) Chemical and Physical Analysis of Hazardous Waste.

Submit Material Safety Data Sheets prepared by explosives' manufactures or similar information that describes chemical information about each item described in your response letter. Also, explain the significance of the weight listed with each explosive. In other words, report the period of time over which those quantities are discharged.

It was stated that, "Approximately 150 bombs with a net explosive weight of 3 lbs. are collected and treated monthly." Verify that the 3 pounds refers to the total explosive component of all 150 bombs.

2c. 270.14(b)(10) Traffic Patterns

Indicate the correct times that the security gates accessing the OB/OD are open and closed.

2e. Indicate the routes used by the Explosive Ordnance Disposal personnel to transport waste to the OB/OD. The copy of the Map 2 that we received did not accept the highlighting ink in the duplication process.

5. 270.14(b)(8)(i) Hazard Prevention

Elaborate on any equipment and/or measures used in the loading and unloading process to prevent potential fire or the possibility of dropping explosives that are specific to your operations. Both safety documents referenced in your previous letter appear to have been written for general U.S. Air Force procedures.

Please submit the requested information within 14 calendar days of receipt of this letter. Receipt and review of this information is necessary before the application can be considered administratively complete [Pt IX, §270.10(c)]. Failure to send the information within 14 calendar days will result in permit denial. Should you have further questions, please contact Mr. Tom Tatkin or Dr. Herb Grover at 827-4300.

Mr. Richards  
December 9, 1991  
Page 3

Sincerely,



Benito J. Garcia  
Bureau Chief  
Hazardous & Radioactive Materials Bureau

BJG/TT

xx: Richard Mayer, U.S. EPA Region VI  
NMED Office of General Counsel  
Edward Horst, NMED  
Dr. Herb Grover, NMED