

MEETING BETWEEN
CANNON AIR FORCE BASE AND
HAZARDOUS & RADIOACTIVE MATERIALS BUREAU



Date: 1/14/93

Time: 9 AM to 12 PM (Particular discussion 11:20 to 12)

Aspect of meeting noted: Melrose Range OB/OD - RCRA Permit

Participants: Barbara Hoditschek, NMED
Tom Tatkin, NMED
Vera Wood, CAFB
Jim Richards, CAFB
Jerry Larsen, USGS

Other meeting attendees did not involve themselves in this portion of the meeting.

Primary focus was on the December 22, 1992 Notice of Violation.

Barbarba reviewed the chronologic sequence of transactions from the October 30 preliminary technical review letter, to the November 6 site visit, to the November 30 CAFB response letter, to the December 22 NOD.

Vera pointed out that the CAFB Environmental Section did not receive their copy until January 8.

Response was that we would make a better effort to improve mailing difficulties.

Jim and Vera raised the issue that the scheduling of 30 days was unrealistic for them to meet. Jim preferred to have 180 days (particularly for waste analysis).

Tom responded that a problem would develop with allowance of that much time, since ED had time-frame commitments with EPA. It was suggested that if permit denial is issued, it would give CAFB all the additional time necessary to complete the necessary work. However, interim status would be lost and therefore OB/OD operations would have to cease. Until a new Part B was reviewed, CAFB could possibly send their wastes to other facilities (e.g. Kirtland AFB or Holloman AFB).

Barbara noted that the Part B was inadequate as last submitted in January 1990. Updated information could have been developed and submitted since that time.

Vera briefly mentioned the difficulties with collecting historic information for what had been treated in the OB/OD site as part of waste analysis.

Tom responded that a misunderstanding may exist and that CAFB needed to only classify wastes that would be treated under a RCRA Permit. Information submitted thus far falls short of giving a complete description of what will go into the OB/OD. A suggestion was made to help with time-frame deadlines. That being that CAFB may want to submit a limited list of explosive wastes which can be permitted, and later submit a Permit Modification when the more complete list is developed.