



DEPARTMENT OF THE AIR FORCE

HEADQUARTERS 27th FIGHTER WING (ACC)
CANNON AIR FORCE BASE, NEW MEXICO



3 JUN 1993

27 FW/CV
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Cannon AFB NM 88103-5214

Ms Barbara Hoditschek
Program Manager, RCRA Permitting Section
Hazardous and Radioactive Materials Bureau
New Mexico Environment Department
1190 St Francis Drive
P O Box 26110
Santa Fe NM 87502

RE: Public Comment for Notice of Intent to Deny Thermal Treatment Permit for
Melrose Air Force Range (your ltr dated 16 Apr 93)

Dear Ms Hoditschek

This package includes our comments to the Notice of Intent to Deny the Thermal
Treatment Permit for Melrose Air Force Range (MAFR).

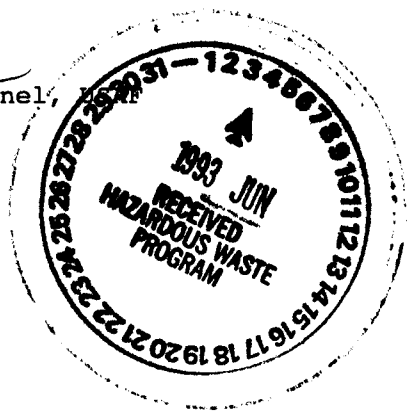
The thermal treatment permit is vital to the missions of Cannon AFB and MAFR.
Atch 1 expresses our desire to pursue the permit application versus
withdrawing the permit application and proceeding with closure of the existing
unit. Atch 2 is a detailed response and timeline of actions to be implemented
by Cannon AFB. The US Geological Survey and Radian Corporation have been
contracted to assist us in making necessary revisions to our permit
application.

We would like to meet with you to discuss the details of our plans to respond
to the outstanding informational requirements you have identified.

If you have any questions, please contact Capt Greg Walters at (505) 784-4348.

Sincerely

Lance L. Smith
LANCE L. SMITH, Colonel,
Vice Commander



- 2 Atch
- 1. Position Paper
- 2. Response Actions and Timeline

POSITION PAPER
ON
PURSUING MELROSE PERMIT VICE CLOSURE

- The Open Burning/Open Detonation (OB/OD) permit is vital to Cannon AFB and Melrose Air Force Range (MAFR)
 - The permit allows for the treatment of off-specification or out-of-date (ADR) munitions from Cannon AFB
 - Without the permit Cannon AFB would have no process to dispose of these ADR munitions
 - Cannon AFB has no existing arrangements with alternate treatment facilities to accommodate Cannon OB/OD requirements
- The MAFR OB/OD unit is currently under interim status with the initial Part A application submitted in 1980
 - There are two courses of action available under the current situation with the part B application package
 - Revise the existing part B application
 - Discontinue the application for the OB/OD unit and submit a new package application for a new unit on MAFR

- **OPTION 1: Pursuit of the Current Permit Application**

-- ADVANTAGES

- Operations at MAFR could continue
- Efforts to obtain necessary funding and information to support permitting requirements have been identified and are on-going
- Estimated cost of Option 1: \$185 K

-- DISADVANTAGES: None

- **OPTION 2: Closure of Current OB/OD Unit and Reapplication for a New Unit**

-- ADVANTAGES: None

-- DISADVANTAGES

- Cannon AFB would still incur the costs associated with construction and permit application for a new unit estimated cost for construction and application: \$230 K
- Need to arrange for alternate treatment facility to handle Cannon's munition items.
- Cannon AFB would be required to submit a closure plan within 15 days of permit denial. Estimated cost of closure plan \$125 K
- Cannon AFB could potentially receive an NOD for the closure plan or new permit application, placing us in a very similar situation
- Estimated closure cost for clean closure \$750 K

-- Total Estimated costs associated with Option 2: \$1105

- **CONCLUSIONS & RECOMMENDATIONS:**

- The costs associated with pursuing the permit application vice closure indicate an approximate cost savings of \$920 K
- We recommend NMED allow Cannon AFB to pursue the current application with the understanding
 - Cannon AFB meets NMED requirements in a timely manner
 - Cannon AFB works closely with NMED to coordinate our actions and respond to NMED concerns

CANNON AFB ACTIONS
TO
SUPPORT MELROSE AFR OB/OD PERMIT APPLICATION

1. Location Standards: 100 year flood plain: The methodology and technical data prepared by USGS is accurate. However, the drawing depicting this information and detailing the position of the flood plain with respect to the OB/OD unit requires additional attention. The following tasks will be accomplished to upgrade this data.

a. A survey of the OB/OD site with reference to the 100 yr flood plain survey.

b. Incorporation of USGS data and OB/OD survey on ACAD software to accurately plot the locations of elevation lines and the edge of the 100 yr flood plain within the OB/OD unit.

c. Modification of the USGS flood plain report to reflect the new information.

2. Sampling and Analysis Plan: The current sampling and analysis plan written by USGS addresses more of a baseline characterization sampling. The plan must be rewritten to reflect an operational sampling plan during the active life of the OB/OD unit. This will include a sampling strategy, sampling frequency, proposed sample locations, and sample test methods. We will proceed with baseline sampling to provide some basis for the new sampling plan.

3. Engineering Report Describing the Unit: A new report must be written. The report will include:

a. Survey data to reference to 100 yr flood plain.

b. Quantitative engineering analysis to determine the size and design of the outer berm to ensure flooding prevention.

c. Location of a single detonation area to be constructed and the dimensions for the berms.

d. Location and height, width, slopes of the flood berm based upon 100 yr flood plain location and quantitative engineering design.

e. Operational procedures used at the OB/OD unit in the form of an Operating Instruction for the 27th Explosive Ordnance Disposal Flight.

d. Inspection and Maintenance schedule for the physical aspects of the unit (i.e. inspection & maintenance after heavy rainfall).

4. Waste Characterization Plan: Modification of this data will incorporate information gathered from Headquarters Air Combat Command. Work will involve compiling this data in tabular form and relating a specific munition type to the

characteristic explosive such as blackpowder. An index will relate the by-products of the explosive to the munition. As more information becomes available through joint efforts by the Department of Defense and US EPA, we will modify this information as necessary. The characterization plan will relate to all items within the Notice of Deficiency.

5. Update Information for the Part B application: The permit application is currently being reviewed. New information will be submitted with the modified permit application.

6. Additional concerns expressed in the 30 Oct 92 Preliminary Technical Review letter such as maps, well information, waste analysis information, inspection procedures, safety and special handling procedures (if the procedures do not require special security requirements), and contingency planning. Those items specifically identified in the 22 Dec 92 Notice of Deficiency will be acted upon as described below.

a. A description of open burning and open detonation activity at MAFR will be included as a background section to the modification package. This information will describe previous activities within the OB/OD area to include the location of decommissioned trenches.

b. Itemizing all waste explosives with dates and quantities that have been burnt or detonated at the unit since Nov 1980 is not possible. Cannon AFB only has records dating back to 1989. This data will be provided in a list format.

c. The DoD study "Identification and Characterization of Emissions and Residues from the Open Burning and Open Detonation of Munitions" is no longer valid and should be deleted from our original package. If a different study is referenced in the modification package, a specific site will be used and a copy will be provided to NMED if so requested.

d. A site specific geological survey will be conducted. This work, conducted within the fenced area of the OB/OD unit, will include continuous core sampling down to the Ogallala formation, "Geoprobe" drilling to the Ogallala formation, and one boring (mud rotary) to the Ogallala Aquifer to confirm depth to groundwater. The drilling to the Ogallala Aquifer will entail continuous core logging for geologic description. The first water encountered will be considered part of the Ogallala Aquifer based upon the regional geology of the area. The information we will establish is a true depth to groundwater at the OB/OD site.

e. An explanation of how and when treated wastes are removed from the OB/OD unit will be included as part of the engineering and operations study. This will include procedures for sifting the soil for recyclable metals or how waste items will be removed from the site.

f. The explanation in the engineering report covering removal of treated wastes will also cover removal of recoverable metal fragments produced from ruptured explosive casings.

7. In addition to these tasks, we are programming two meetings with NMED staff into the timeline. The first meeting will serve as a coordination meeting to discuss Cannon AFB actions and determine if the scopes and concepts are accurate to fulfill NMED requirements. The second meeting will be held after the draft application package is prepared to present the data to NMED and ensure its sufficiency and receive comments on the draft package. This draft review should help minimize NMED review time of the final package, saving manhours in review and modification.

SUBPART X PERMIT APPLICATION SCHEDULE MELROSE RANGE

