



DEPARTMENT OF THE AIR FORCE

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

27 FW/CC
100 S DL Ingram Blvd Suite 100
Cannon AFB NM 88103-5214

Ms. Barbara Hoditschek
Program Manager RCRA Permits
Hazardous and Radioactive Materials Bureau
New Mexico Environment Department
1190 St Francis Drive
Santa Fe NM 87502

RE: Melrose Air Force Range
EPA ID Number 5572124456

20 SEP 1993



Dear Ms. Hoditschek

This letter is to request a clarification from the New Mexico Environment Department (NMED) concerning Cannon AFB clearance operations at Melrose Range and subsequent detonation of unexploded material, or "dud" bombs.

Currently, all clearance operations and detonations of "dud" bombs take place at the range. As such, it is our understanding that all scrap metal generated by this process is considered solid waste and is exempt from the RCRA regulations (reference 40 CFR 261.2 and 261.6(a)(3)(iii)). In light of this, it is our interpretation that all scrap metal generated by our clearance and detonation operations can be disposed of as scrap metal or recycled. Hopefully, our interpretation of the RCRA regulations will comply with the Environmental Protection Agency and NMED regulatory scheme. Cannon AFB will not dispose of any scrap metal until approval is granted by your office.

It is important that both offices expedite this matter so that Cannon AFB can execute an acceptable action plan. If you have any questions, Mr Bruce Oshita and Capt Greg Walters are ready to assist you. They can be reached at (505) 784-4639.

Sincerely


WILLIAM M. GUTH, Colonel, USAF
Commander

cc: Mr William Honker, EPA