



BRUCE KING
GOVERNOR

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

JUDITH M. ESPINOSA
SECRETARY

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DEPUTY SECRETARY

FEDERAL EXPRESS

August 3, 1994

Mr. William Honker, Chief
RCRA Permits Branch (6H-PN)
U.S. EPA, Region 6
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

RE: Public Notice of draft Operating Permit for the Melrose Air Force Range, Roosevelt County, New Mexico

Dear Mr. Honker:

Enclosed for your records and the public's inspection is a copy of the Melrose Air Force Range Operating Permit and other correspondence related to public notification. The correspondence includes a fact sheet, a public notice, a letter to the Permittee regarding review of the draft permit, letters for public notice advertisements, a letter to concerned citizen on our mailing list and letters to the two local repositories where the draft permit will be housed.

The New Mexico Environment Department will accept public comments, as stated in the fact sheet, between August 8, and September 21, 1994. We received comments from the EPA Permitting Section during the 30 day period prior to initiating public notice. These comments have been responded to in the enclosed attachment.

Any questions that you might have about the draft permit or public notice should be directed to Tom Tatkin at (505) 827-4308.

Sincerely,

Handwritten signature of Barbara Hoditschek in cursive.

Barbara Hoditschek, Manager
RCRA Permits Program
Hazardous & Radioactive Materials Bureau

Enclosures
Attachment

cc: File Red, '94

ATTACHMENT

Response to EPA Comments on the
Melrose Air Force Range Open Detonation Permit
(Preliminary Draft Permit-Prior to Public Comment)
August 3, 1994

Item 1

EPA: Module II; General Facility Permit Condition: There needs to be a condition added to the permit requiring the owner or operator to notify the new owner or operator in writing of the requirements of 40 CFR 264 and 270 (264.12(c)).

NMED: Additional language has been added to Permit Condition I.E.12. to satisfy the required information.

Item 2

EPA: Page II-3; There needs to be a condition placed in the permit requiring that the Air Force (Melrose Range) make arrangements with the local authorities (264.37).

NMED: Additional language has been added to Permit Condition II.I.4. to satisfy the required information.

Item 3

EPA: Page II-2; Condition II.B.2.: Since the owner and the operator of Melrose Range is Cannon AFB, this condition can be clarified by stating that no waste other than that generated by Cannon AFB or at the Range can be accepted.

NMED: Additional language has been added to Permit Condition III.B.2. to satisfy the required information.

Item 4

EPA: Page III-1; Condition III.B.4.: The word "per" needs to be inserted between the words "pounds" and "calendar".

NMED: The word "per" has been added to Permit Condition III.B.4.

Item 5

General Comment: Did the permittee submit air modeling or air monitoring information on Melrose Range? If, not, the Region recommends that a condition requiring air modeling or air monitoring information be placed in the permit.

NMED: Response to the comment on air modeling or air monitoring will be delayed until after the public comment period. Presently, we are awaiting justification from CAFB for their supplying adequate materials to evaluate environmental impact to the air from the proposed open detonation activity. Supplied information in the Part B application includes published literature on emissions for those explosives to be permitted. In addition, the waste stream shown in the waste analysis portion of the permit shows air emissions that may potentially occur.

I.E.9.c. Pursuant to HWMR-7, Part IX, §270.30(j)(3), records of monitoring information shall specify:

- i. The dates, exact place, and times of sampling or measurements;
- ii. The individuals who performed the sampling or measurements;
- iii. The dates analyses were performed;
- iv. The individuals who performed the analyses;
- v. The analytical techniques or methods used; and
- vi. The results of such analyses.

I.E.10. Reporting Planned Changes

The Permittee shall give notice to the Secretary, as soon as possible, of any planned physical alterations or additions to the permitted facility (i.e., the Open Detonation Unit) as required by HWMR-7, Part IX, §270.30(1)(1).

I.E.11. Reporting Anticipated Noncompliance

The Permittee shall give advance notice to the Secretary of any planned changes in the facility's permitted design (i.e., the Open Detonation Unit), construction or activity which may result in noncompliance with Permit Conditions (HWMR-7, Part IX, §270.30(1)(2)).

I.E.12. Transfer of Permits

This Permit is not transferable to any person, except after notice to the Secretary. The Secretary may require modification or revocation and reissuance of the Permit pursuant to HWMR-7, Part IX, §270.40 ~~(HWMR-7, Part IX, §270.30(1)(3))~~. Before transferring ownership or operation of the facility during its operation life, the Permittee shall notify the new owner or operator in writing of the requirements of HWMR-7, Part V, §264.12(c) and Part IX, §270.30(1)(3).

I.E.13. Twenty-Four Hour and Subsequent Reporting

MODULE II - GENERAL FACILITY CONDITIONS

II.A. DESIGN AND OPERATION OF FACILITY

II.A.1. Although the facility includes all contiguous lands at the Melrose Air Force Bombing and Gunnery Range, owned and operated by the Permittee, only one unit is being permitted. That unit is designed to treat hazardous waste by open detonation. The extent of the unit is far less encompassing than the entire facility. A description of the unit is provided in Module III. The facility includes all security barriers, roadways, support buildings and equipment, all related to the activities of the Open Detonation Unit. More broad definitions of the terms unit and facility are provided in Module I.

II.A.2. The Permittee shall construct, maintain and monitor the facility and the facility's Open Detonation Unit to minimize the possibility of an unexpected fire, an unscheduled explosion, water damage or any unplanned, sudden or unsudden release of hazardous waste constituents to air, soil, waters which could threaten human health or the environment. The Permittee shall maintain all structures and equipment and follow the procedures described in Permit Attachment A through K.

II.B. REQUIRED NOTICE

II.B.1. Hazardous Waste Imports

This Permit does not allow the Permittee to receive hazardous waste from a foreign source. If the Permittee is to receive hazardous waste from a foreign source, the Permittee shall apply for and receive a permit modification in accordance with HWMR-7, Part V, §264.42 prior to accepting such waste.

II.B.2. Hazardous Waste from Off-Site Sources

"Off-site source" refers to a waste generated by sources other than the Permittee or its contractor(s) operating at either Cannon Air Force Base or the Melrose Air Force Bombing and Gunnery Range. This Permit does not allow the Permittee to accept hazardous waste form off-site- of the facility other than that generated at Cannon Air Force Base or Melrose Air Force Range. If the Permittee is to receive hazardous waste from off-site, the Permittee shall apply for and receive a permit modification in accordance with HWMR-7, Part IX, §270.42 prior to accepting such waste.

ignitable, reactive, and incompatible wastes set forth in Permit Attachment E.

II.H. LOCATION STANDARDS

The Permittee shall design, construct and maintain the Open Detonation Unit to prevent leaching or washout of any hazardous waste as a result of the 100-year flood and any smaller precipitation event and as required by HWMR-7, Part V, §264.18(b)(1).

II.I. PREPAREDNESS AND PREVENTION

II.I.1. Required Equipment

At a minimum, the Permittee shall maintain at the Melrose Air Force Range, the communication, decontamination, flood damage mitigation and fire control equipment set forth in the Contingency Plan (Permit Attachment F) as required by HWMR-7, Part V, §264.32.

II.I.2. Testing and Maintenance of Equipment

The Permittee shall test and maintain the equipment specified in Permit Condition II.I.1, as necessary, to assure its proper operation in time of emergency, as required by HWMR-7, Part V, §264.33.

II.I.3. Access to Communications or Alarm System

The Permittee shall maintain access to the communications or alarm system, as required by HWMR-7, Part V, §264.34.

II.I.4. Arrangements with Local Authorities

The permittee shall maintain arrangements with state and local authorities, as required by HWMR-7, Part V, §264.37. If state or local officials refuse to enter into preparedness and prevention arrangements with the Permittee, the Permittee must document this refusal in the operation record.

II.J. CONTINGENCY PLAN

II.J.1. Implementation of Plan

The Permittee shall immediately carry out the provisions of the Contingency Plan (Permit Attachment F), whenever there is a fire, unscheduled explosion, water damage or release of

MODULE III - CONDITIONS SPECIFIC TO
THE OPEN DETONATION UNIT

III.A. MODULE HIGHLIGHTS

This Module provides conditions for the treatment of hazardous waste by open detonation in a discrete RCRA unit. Information provided by the Permittee has been compiled in Permit Attachments I through L, found in this Permit, and are the basis for complying with the New Mexico Hazardous Waste Management Regulations (HWMR-7) regarding specific wastes and quantities allowed for treatment, unit design, operating procedures, and environmental monitoring. Hazardous wastes treated at the permitted Open Detonation Unit are strictly waste munitions generated from U.S. Air Force operations both at Cannon Air Force Base and the Melrose Air Force Bombing and Gunnery Range, both located near Clovis, New Mexico. Hazardous wastes addressed by this module are primarily hazardous by nature of the reactivity characteristic, and to a lesser degree by the characteristic of toxicity.

III.B. PERMITTED AND PROHIBITED HAZARDOUS WASTES

- III.B.1. The Permittee may treat at the Open Detonation Unit only those hazardous wastes identified in Permit Attachment I, subject to the terms of this Permit.
- III.B.2. The Permittee is prohibited from treating hazardous waste not identified in Permit Attachment I. This prohibition is meant to include, but not limited to boxes or other packaging used for storage or transport of permitted hazardous wastes, unless otherwise properly analyzed and shown not to be a hazardous waste.
- III.B.3. The Permittee shall apply for and receive a permit modification prior to routine treatment of additional hazardous waste items not identified in Permit Attachment I. However, the Secretary may approve in writing treatment of newly identified items, on a one time basis, when the hazardous waste constituents are the same as those items in Permit Attachment I.
- III.B.4. The amount of hazardous waste allowed for treatment by this Permit shall not exceed a total of 8,000 pounds per calendar year. This amount applies strictly to the net explosive weight of all ordnance item treated.
- III.B.5. When the amount of any hazardous waste treated in a calendar year exceeds the amount listed in Permit Condition III.B.4., the Permittee shall submit a

JUL 1 1994
JUL 13 1994

Mr. Benito Garcia, Chief
Hazardous and Radioactive Waste Bureau
525 Camino de los Marquez
P.O. Box 26110
Santa Fe, NM 87502

RE: Preliminary Draft Permit Comments - Melrose Air Force
Range - NM5572124456

Dear Mr. Garcia:

On June 28, 1994, Region 6 received a preliminary draft permit for the above mentioned facility prepared by the New Mexico Environment Department. This document establishes provisions for the treatment of hazardous wastes by open detonation.

We have completed a review of the preliminary draft permit and offer the enclosed comments for your consideration. If you have any questions, please contact Rich Mayer of my staff at (214) 655-7442.

Sincerely yours,

William K. Honker, P.E.
Chief, RCRA Permits Branch

Enclosure

6H-pn:7442:7/12/94:RMldisk:a:filein permits nm....456

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**Comments on the U.S. Air Force Melrose
Range Open Detonation Preliminary Draft Permit**

Module II; General Facility Conditions: There needs to be a condition added to the permit requiring the owner or operator to notify the new owner or operator in writing of the requirements of 40 CFR 264 and 270 (264.12(c)).

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PUBLIC NOTICE

**NEW MEXICO ENVIRONMENT DEPARTMENT
HAZARDOUS AND RADIOACTIVE MATERIALS BUREAU**

Public Notice No. 69

August 7, 1994

**NOTICE OF INTENT TO GRANT A PERMIT FOR THE
OPERATIONS OF A HAZARDOUS WASTE TREATMENT FACILITY
at
CANNON AIR FORCE BASE'S
MELROSE AIR FORCE BOMBING AND GUNNERY RANGE
ROOSEVELT COUNTY**

The State of New Mexico is authorized to operate a hazardous waste management program in lieu of the Federal program for those portions of the Resource Conservation and Recovery Act (RCRA) in effect prior to the Hazardous and Solid Waste Amendments of 1984 (HSWA). HSWA imposes additional requirements on hazardous waste management facilities, and these requirements will be administered and enforced by the U.S. Environmental Protection Agency (EPA) until the State of New Mexico receives authorization for those requirements.

Under the authority of RCRA, the New Mexico Environment Department (NMED) and the EPA, Region 6 propose to issue a permit to the U.S. Department of the Air Force, Cannon Air Force Base (CAFB) at the Melrose bombing and Gunnery Range (MAFR), Roosevelt County, for the operations of an Open Detonation Unit, and for the implementation of the HSWA provisions. The final decision on the Permit is issued under the authority of RCRA as amended by HSWA. MAFR has been assigned the EPA identification number NM5572124456.

The proposed Permit contains conditions regulating the operations of the Open Detonation Unit. That portion of the MAFR owned and operated by CAFB is located in Township 1 South, Range 30 East, Township 1 North, Range 30 East, and Township 2 North, Range 30 East, New Mexico Principal Meridian. The Open Detonation Unit is located in the southwest quarter of Section 27, Township 1 North, Range 30 East, New Mexico Principal Meridian.

Requirements imposed by HSWA include such concerns are waste minimization, land disposal restrictions, air emission standards

Page 2 of 2
Public Notice
August 7, 1994

for process vents and corrective action for releases from Solid Waste Management Units (SWMUs).

The administrative record for the proposed draft Permit consists of a Fact Sheet, the Permit application, this notice and related correspondence. The draft Permit and the full administrative record may be viewed at the NMED's Hazardous & Radioactive Materials Bureau, located at 525 Camino de los Marquez, Suite 4 in Santa Fe. The Fact Sheet and the draft Permit may be viewed at the Clovis-Carver Public Library located at 701 Main Street in Clovis, the Portales Public Library located at 218 South Avenue B in Portales or at the EPA, Region 6 library located at 1445 Ross Avenue in Dallas, Texas. To obtain a copy of the administrative record or any part thereof, at 35 cents per page, contact:

Ms. Barbara Hoditschek
New Mexico Environment Department
Hazardous & Radioactive Materials Bureau
525 Camino de los Marquez, Suite 4
P.O. Box 26110
Santa Fe, New Mexico 87502

Any person may comment on the proposed draft Permit or request a public hearing by submitting written comments or requests, including the commentor's name and address to the address given immediately above. Requests for a public hearing must state the nature of the issues to be raised at the hearing. The State of New Mexico will accept comments or requests for a public hearing regarding the draft Permit only during the comment period, August 8, 1994 through September 21, 1994. NMED will provide a 30-day notice of any public hearing, if scheduled. EPA may participate in the public hearing, if held. All written comments submitted on the proposed draft Permit received by the above dates or made during a public hearing, if held, will be considered in formulating a final decision. NMED may modify the draft Permit based on comments received. NMED will notify the CAFB and each person who submits written comments during the public comment period or provided comments during the public hearing, if held, of the final decision.

A representative from the New Mexico Environment Department will also be available on August 8, 1994 at the Clovis-Carver Public Library, to answer questions pertaining specifically to the draft Permit. The representative will be present between 3 p.m. and 6 p.m.

This Notice satisfies the requirements of RCRA, as amended 42 U.S.C. 6910 et seq., and the Hazardous Waste Management Regulations (HWMR-7, Part IX, Section 902(c)).

F A C T S H E E T
August 1994

Intent

The New Mexico Environment Department (NMED) proposed to issue a Resource Conservation and Recovery Act Permit for operating a hazardous waste treatment unit at the Melrose Air Force Bombing and Gunnery Range (MAFR), Roosevelt County, under authority of the New Mexico Hazardous Waste Act (NMHWA)

Facility Name

Melrose Air Force Bombing and Gunnery Range (MAFR)

EPA Identification Number

NM5572124456

Location

Approximately 30 miles northwest of Portales and 25 miles west of Cannon Air Force Base

Land Owner

The United States Department of the Air Force

Facility Operator

Cannon Air Force Base (CAFB)

General Description of the Hazardous Waste Management Unit

The hazardous waste treatment unit serves to render military munitions non-explosive through the process of detonation. Detonation takes place on a grade level pad that is open to the atmosphere. A protective berm surrounding the detonation pad is designed to eliminate surface water drainage and to help control the distribution of particulate and gaseous emissions. Both the pad and the berm are referred to as the detonation structure. Several hundred feet out from the detonation pad and its berm is another berm that prevents surface drainage outside the unit from entering the encompassed cleared zone between the two berms and the detonation structure.

Facility Activities Managing Waste

CAFB personnel, operating at the MAFR will perform open detonation treatment of obsolete, unserviceable or off-specification, conventional munitions generated by CAFB in support of its U.S. Air Force mission.

The waste munitions, intended to be permitted, are specific items for which chemical and physical characteristics are well known. Emissions from the treatment process are gases, particulate debris and residues. Environmental concern is small for the release of gases during treatment due to the type of explosive ingredients and the amount of waste that would be permitted. Similarly, particulate debris and residues are not expected to create a significant environmental impact. None the less, waste would be managed so that the most likely affected soils are sampled, analyzed and compared to an New Mexico Environment Department (NMED) approved standard. Should contaminant concentrations exceed the standard, remedial action would be implemented for environmental restoration to an acceptable level.

Availability of the Draft Permit

Copies of the draft Permit are available for public review at: the reference desk of the Clovis-Carver Public Library, located at 701 Main Street in Clovis; the reference desk of the Portales Public Library located at 218 South Avenue B in Portales; the NMED's Hazardous & Radioactive Materials Bureau located at 525 Camino de los Marquez, Suite 4 in Santa Fe; and the library of the U.S. Environmental Protection Agency (EPA), Region VI, located at 1445 Ross Avenue in Dallas, Texas.

Comment Period

Any person, including the applicant, may comment on the tentative decision to issue the Permit, or on the terms of the draft Permit by submitting written comments to the Hazardous & Radioactive Materials Bureau, P.O. Box 26110, Santa Fe, New Mexico 87502, attention Ms. Barbara Hoditschek. Comments must be received between August 8 and September 21, 1994 in order to be considered.

A representative from the NMED will be available at the Clovis-Carver Public Library to answer questions specifically pertaining to the draft Permit on August 17, 1994, between the hours of 3 p.m. and 6 p.m. The library is located at 701 Main Street in Clovis.

Procedures for Requesting a Hearing

Any person, including the applicant, may request a public hearing concerning the proposed action by submitting a written request to the addresses given in the section immediately above. Any request for a hearing must be made in writing and must state the nature of the issue to be raised in the hearing. Requests must be received by September 21, 1994 to be considered. The NMED will provide a 30-day notice of any public hearing, if scheduled. The EPA may participate in the public hearing, if held.

Description of the Permit

The entire RCRA Permit for the MAFR hazardous waste management facility, including the Open Detonation Unit consists of Permit Conditions prescribed by the NMED under the New Mexico Hazardous Waste Act as well as Permit Conditions prescribed by the U.S. EPA under the Hazardous & Solid Waste Amendment (HSWA). The portion of the Permit proposed by the NMED under the New Mexico Hazardous Waste Act describes the structures, equipment, and procedures CAFB personnel will use to operate, maintain and monitor hazardous waste treatment operations. The HSWA portion of the Permit addresses waste minimization, source reduction, corrective action and facility investigations of older (operating before November 1980), inoperative hazardous waste management units at the facility.

Final Decision

All comments submitted concerning this proposed action will be considered in formulating the final decision. The Secretary of the NMED may either approve the Permit as written, or deny the Permit in whole or in part. If the Permit is issued, it will become the operating conditions in conjunction with all applicable regulations promulgated in the New Mexico Hazardous Waste Regulations (HWMR-7) for hazardous waste management at the facility. The NMED will notify Cannon Air Force Base and each person who submitted written comments during the public comment period and during a public hearing, if held, of a final decision.