



DEPARTMENT OF THE AIR FORCE

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

22 SEP 1994

Christopher S. Long, Colonel, USAF
Commander, 27th Support Group
100 S DL Ingram Blvd Suite 200
Cannon AFB NM 88103-5217

Mr. Tom Tatkin
Hazardous & Radioactive Materials Bureau
New Mexico Environment Department
1190 St Francis Drive
PO Box 26110
Santa Fe NM 87502

Dear Mr. Tatkin

The comments for the draft Melrose Air Force Range (AFR) RCRA Permit are located at Attachment 1. We thank you for the time and effort you have put into the document.

As stated in the first comment, Headquarters Air Force and Air Combat Command are currently addressing the concept of regionalized thermal treatment facilities. We should have a final decision in the next few months. However, there is no current indication Melrose AFR will become a regional facility. We will inform you of the decision as soon as the information is disseminated.

Again, thank you for your support and assistance in working through the permit process. If you have any questions, please contact Capt Greg Walters of my environmental flight at (505) 784-6022.

Sincerely

A handwritten signature in cursive script that reads "Christopher S. Long".

CHRISTOPHER S. LONG, Colonel, USAF
Commander, 27th Support Group

Attachment:
Comments on the Draft MAFR RCRA Permit

cc:
EPA Region VI

CANNON AFB COMMENTS
ON
DRAFT OPEN DETONATION PERMIT
FOR
MELROSE AIR FORCE RANGE

1. General Clause: Melrose AFR will not operate the range until the detonation area construction is completed. This project is currently in our funding program. However, we will not receive funding until Headquarters Air Force and Air Combat Command make a final decision on regionalization of thermal treatment operations. This decision may result in closure of the unit. Cannon AFB recommends the permit process continue with the specific condition that no operations are conducted until the construction is completed. In addition, we request environmental monitoring requirements and required inspections be postponed until operations commence. If closure is directed by higher headquarters, a closure schedule will be submitted within the allotted deadline.
2. Section II.C, pg II-2: As was discussed in the permit application, chemical analysis of the waste streams is not practical. We suggest instead to review the acceptable waste munition items listing and basic explosive composition sheets (Table A-1, A-2, and A-3 in Appendix A of this permit) on an annual basis. This will ensure any explosive compounds added to the Cannon AFB (CAFB) inventory which may require thermal treatment will be included as part of the waste stream. Sampling as stated in the permit application applies to potential soils residue after a detonation episode. This is clarified in Appendix C1-4 of the permit application.
3. Pg PA-C-1 and pg PA-C-2, Inspection Frequency: Contractor inspections should be conducted on a weekly basis. The treatment unit is operated very infrequently (quarterly basis) and Melrose Range is normally operated six days per week. Based upon the infrequency of use, the fact all waste is transported and treated on the same day (no container storage), and the added inspections by Environmental and EOD Flights, it would be reasonable for the contractor to inspect the units weekly in accordance with 40 CFR 264.602 and NM HWMR -7. This would also align this section with the introduction section on pg PA-C-1. It should be noted Munitions Management Flight personnel are responsible for inspection of the transport vehicles, not the operability and security of the treatment unit. Accordingly the inspection sheet (Table C-3, pg PA-C-9) should be changed. It would be possible to amend paragraph PA-C-2 to reflect "or the most recent inspection checklist. An example is located in Table C-3."
4. Section III.D.5, pg III-3: Renumber paragraph from III.C.5 to III.D.5. It is agreed standing water should not persist on the treatment unit and allowed to act as a driving force for potential contamination. However, due to the remoteness of the range from Cannon AFB, it would be reasonable to require inspection of the unit within 24 hours of a rainfall. Removal and testing should be accomplished within 48 hours after standing water is discovered,

allowing base personnel enough time to properly respond with necessary pumping and sampling equipment.

5. Pg III-4, top of page, relabel paragraphs.

6. Section IV-B-6d, pg IV-7: Please refer to the first comment (para 1). Waste analysis is performed by annual verification of the munition items which may require detonation and reviewing Tables A-1, A-2, and A-6 in Attachment A to this permit.

7. Section IV-J, pg IV-15, RFI Workplan: We are concerned with the submittal date requirements for the RFI Workplan and subsequent documents to support the RFI investigation. Cannon AFB has had RFI work programmed and funding requested for the last three years. Cannon AFB recommends meeting with NMED and EPA officials to logically discuss a RFI schedule to account for government funding and contracting processes and ensure proper review times are in place for all agencies. Cannon AFB requests rewriting submittals to state "Cannon AFB will submit a draft RFI schedule within 60 days of the effective date of this Permit. The final RFI schedule will be amended to this permit as required submittals. All submittal dates of this permit are tentative based upon the final RFI schedule." Our goal is to eliminate the use of extension requests in order to meet submittal deadlines. If we have a solid RFI schedule, EPA, NMED, Cannon, and the Corps of Engineers can all program our work based upon the schedule. It will also assist in funding validation by providing a good programming to advocate for needed funding.

8. Section K-1, pg IV-16: The first sentence states "[STATE AGENCY]." Which state agency? We believe this is a simple oversight in compiling this section of the permit. Please specify which state agency.

9. Pg PA-A-4, "Test Methods" paragraph: Please insert "or most current issue" after November 1986.

10. Page PA-A-17 is missing.

11. Page PA-A-2: Normally, the SF1800 is required to be signed each day the vehicle is used. This is standard Air Force practice. Suggest we change wording to: "The Munitions Management Flight conducts daily inspections each day of vehicle use to transport military personnel, safety equipment and munitions."

12. Table B-1, pg PA-B-2: Surveillance should be "Surveillance." Please modify the "Frequency of Surveillance" column to reflect "weekly or each day of operational use." This would reflect security inspections each day the range or OD unit were used thereby eliminating non-operational days and possible inspection log miscommunications.

13. Table C-3, pg PA-C-9: Please delete the words daily from the inspection checklist. As in comment 2 (paragraph 2), regular contractor inspections should be changed from daily to weekly. Accordingly the inspection sheet should be changed. It would be

possible to amend paragraph PA-C-2 to reflect "or the most recent inspection checklist. An example is located in Table C-3."

14. General Comment: The permit refers to some specific Air Force Regulations, Technical Orders and policies. These items change with time. In particular the Air Force is implementing Air Force Instructions which will replace regulations. It would be best if a clause were added (possibly is Section I.B.1, pg I-1) which would allow for the revisions of these references through written correspondence with NMED.