

FB95



GARY E. JOHNSON  
GOVERNOR

State of New Mexico  
**ENVIRONMENT DEPARTMENT**  
Hazardous & Radioactive Materials Bureau  
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P.O. Box 26110  
Santa Fe, New Mexico 87502  
(505) 827-4358  
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ENTERED

MARK E. WEIDLER  
SECRETARY  
EDGAR T. THORNTON, III  
DEPUTY SECRETARY

**CERTIFIED MAIL  
RETURN RECEIPT REQUESTED**

September 5, 1995

Lilia A. Lenhart  
Environmental Engineer  
Directorate of the Environment  
U.S. Army Air Defense Artillery Center and Fort Bliss  
ATTN: ATZC-DOE  
Fort Bliss, Texas 79916-6816

Dear Ms. Lenhart:

**RE: Class I Modification for US Army Air Defense Artillery  
Center, Fort Bliss  
EPA ID No. NM4213720101-01**

The New Mexico Environment Department (NMED) Hazardous and Radioactive Materials Bureau (HRMB) has completed review of U.S. Army Air Defense Artillery center, Fort Bliss's (USAADACFB) request for Class I permit Modification. You indicated in your letter of August 4, 1995, that the changes you wished to effect were for a different approach to determining that samples are safe (i.e., non-explosive) for chemical analysis. Specifically, you proposed to use visual inspection of samples by trained Explosive Ordnance Disposal experts instead of reactivity tests (Gap and Deflagration/Detonation Transition Test) on page 16, Permit Attachment J. This modification was requested in order to reduce the amount of each sample from 50 pounds to about 1 pound.

Based upon the above information which USAADACFB supplied to HRMB, NMED hereby approves the Class I permit modification for USAADACFB. The effective date of the approval is your date of receipt of this letter. These changes are shown on the first page of the three attached pages. The second and third pages of the enclosure shall now replace pages 16 and 18 of Permit Attachment J of the open detonation (OD) permit that was issued on June 8, 1995. These changes have been incorporated into the USAADACFB operational Permit **EPA ID #: NM4213720101-01**. You are required to incorporate the enclosed copies in USAADACFB's copy of the OD Permit originally issued by NMED.

Ms. Lenhart, USAADACFB  
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Further, USAADACFB is required to send a notice of the modification to all persons on the facility mailing list which is enclosed herein. This notification must be made within 90 calendar days after the change is put into effect in compliance with 20 NMAC 4.1, Subpart IX, 40 CFR §270.42(a)(ii).

If you have any questions on this matter you may contact either Barbara Hoditschek or Cornelius Amindyas at (505) 827-1561.

Sincerely,



Ed Kelley, Ph.D.  
Director, Water and Waste Management Division

Enclosures

cc: Benito Garcia, Chief HRMB  
Barbara Hoditschek, Program Manager, RCRA, HRMB  
David Neleigh, EPA Region 6PD-N  
Cornelius Amindyas, HRMB  
File-Red 95  
File, Reading

- 4 discrete samples around the perimeter of each of the OD pits (outside of the pits) to evaluate the effect of kickout (8 total),
- 3 discrete background samples from an area of the site that has not been impacted by operation of the EOD.

Soil samples will also be collected from a depth of surface to 6 in (15.2 cm), and 6 in (15.2 cm) to 1 ft (0.3 m) at the following locations:

- 8 discrete random samples in the bottom of the treatment unit (but not in the pits),
- 8 discrete samples from the perimeter (outside of the treatment unit), and

In addition, soil samples will be taken at 5 ft (1.5 m) intervals from a 50 ft (15 m) boring place approximately in the middle of the treatment unit. The analytical results will be evaluated to determine whether drilling to a depth greater than 50 feet is necessary.

All samples will be examined for physical evidence of UXO. ~~The samples will then be subjected to the reactivity tests (Gap Test and Deflagration/Detonation Transition Test).~~ Trained Explosive Ordnance Disposal (EOD) experts will use visual inspection to determine that the soil samples taken following the open detonation episode are safe (i.e., non-explosive) for chemical analysis. Upon completion of these tests, each discreet soil sample will be placed into a cleaned mixing bowl, mixed thoroughly (to homogenize the sample) and then placed into its appropriate sample container. There will be no compositing of any samples.

Sample containers will be placed into a cooler with ice. When sampling is completed for the day, all samples will be shipped by overnight courier to an EPA acceptable qualified laboratory, under appropriate chain-of-custody procedures, for analysis.

During the Initial Unit Characterization Sampling, only one boring in the treatment unit will be made to determine if downward migration of PEP materials has occurred. It will be made after the soil samples have been taken and analyzed, in order to not place it in an area of surface contamination that may be carried downward with the boring. Samples will be taken on 5 ft (1.5 m) intervals for logging (visual classification) and chemical analysis for 50 ft (15.2 m). Quality assurance and decontamination procedures are discussed below in the Quality Assurance Project Management Plan (QAPMP).

- 4 discrete samples around the perimeter of each of the OD pits (outside of the pits) to evaluate the effect of kickout (8 total),
- 3 discrete background samples from an area of the site that has not been impacted by operation of the EOD.

Soil samples will also be collected from a depth of surface to 6 in (15.2 cm), and 6 in (15.2 cm) to 1 ft (0.3 m) at the following locations:

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### Frequency of Analysis

Initial unit characterization and subsequent sampling will be conducted semi-annually. Results will be reported to NMED after each sampling event. Similar sampling will be conducted at closure.

### Soil Sample Analyses:

The analytical methods to be used for the OD treatment unit potentially contaminated soils will be those listed in Table J-3.

### "Kick-Out" Residue

This section addresses the concern that the PEP waste are ejected from the treatment unit and the fragments potentially result in environmental contamination.

### Open Detonation:

Little, if any, ash is generated following an explosive open detonation. The residue following open detonation consists of metallic fragments and occasional pieces of PEP which were not thermally treated during the explosion. Following each detonation, and as soon as the site can be safely approached, typically within 24 hours of the detonation, the site will be closely inspected for metallic or PEP fragments. Metallic fragments that are obviously free of PEP will be collected and stored to be surplused. PEP fragments found will be detonated at the point they are found with no additional handling.

### Potential for Danger

Waste PEP is not present at the OD treatment unit until immediately prior to being treated. During the treatment process, access to the site is controlled by Range Control and there is only one access road. There is, therefore, no significant potential for exposure of domestic animals, wildlife, crop, or vegetation during the OD treatment process.

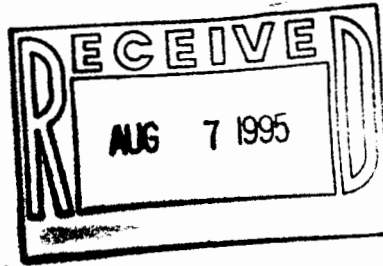
PEP is detonated in accordance with minimum safety distances detailed in 40 CFR 265.382. These safety distances refer to the distance from the open detonation unit to the property of others and are specified below in Table J-4.



5599 SAN FELIPE  
SUITE 700  
HOUSTON, TEXAS 77056  
PHONE: (713) 621-1620  
FAX: (713) 621-6959

4 August 1995

Mr. Corneilus Amindyas  
Environmental Department  
2044 A Galisteo  
Santa Fe, NM 87503



Re: OD Treatment Unit  
Fort Bliss, Texas

Dear Mr. Amindyas:

As Greg Braddy has discussed with you, Ft. Bliss would like to use a different approach to determining that samples are safe (e.g., non-explosive) for chemical analysis. Specifically, we propose to use visual inspection of samples by trained Explosive Ordnance Detonation (EOD) experts, instead of:

"reactivity tests (Gap Test and Deflagration/Detonation Transition Test)"  
re: page 16 of 41

Please note, this will not impact the environmental analyses.

Please respond as soon as possible so that we can meet the current schedule. Thank you for your consideration.

Very truly yours,

ROY F. WESTON, INC.

  
Thomas W. Hoskings, Ph.D., P.E.  
Project Director

TWH/kjk

cc: Lilia Lenhart - Ft. Bliss  
Rick Smith - Tulsa