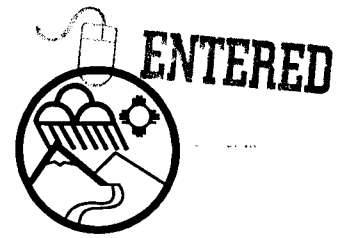




GARY E. JOHNSON
GOVERNOR

State of New Mexico
ENVIRONMENT DEPARTMENT

Hazardous Waste Bureau
2044 A Galisteo, P.O. Box 26110
Santa Fe, New Mexico 87502-6110
Telephone (505) 827-1557
Fax (505) 827-1544



PETER MAGGIORE
SECRETARY

PAUL R. RITZMA
DEPUTY SECRETARY

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

December 29, 2000

Mr. Keith Landreth
Director of Environment
Directorate of Environment
Department of the Army
Headquarters, U. S. Army Air Defense Artillery Center and Fort Bliss
1733 Pleasonton Road
Fort Bliss, Texas 79916-6816

**RE: REQUEST FOR CLASS II PERMIT MODIFICATION FOR U.S. ARMY AIR
DEFENSE ARTILLERY CENTER AND FORT BLISS OPEN DETONATION
OPERATIONAL PERMIT
PERMIT NO.: NM4213720101-01**

Dear Mr. Landreth:

The Hazardous Waste Bureau (HWB) of the New Mexico Environment Department (NMED) has reviewed the U.S. Army Air Defense Artillery Center and Fort Bliss's (Fort Bliss) *Request for Class II Permit Modification for Open Detonation Operational Permit* submitted on October 12, 2000.

In your letter of October 12, 2000, you requested that HWB make six (6) changes to your permit in order to allow Fort Bliss to receive and treat off-site waste from White Sands Missile Range, a contiguous Department of Defense facility, at your permitted unit. These changes constitute a Class 2 modification to your permit, as specified at 20.4.1.900 NMAC, incorporating 40 CFR 270.42(b).

As required, Fort Bliss sent a notice of this modification request to all persons on the facility mailing list and to the appropriate units of State and local government. Fort Bliss opened a 60-day public comment by publishing a legal notice in local newspapers on October 15, 2000; the public comment period ended on December 14, 2000. Fort Bliss also placed a copy of this permit modification request and supporting documents at the Las Cruces Branigan Memorial Library and the Alamogordo Public Library. Fort Bliss held a public meeting at their Restoration Action Board Meeting on November 15, 2000; no verbal comments were entered into the public

Mr. Keith Landreth
December 29, 2000
Page 2

record at the public meeting and no written comments were submitted to either Fort Bliss or HWB by the close of the public comment period on December 14, 2000.

Based on the above information, NMED hereby approves the Class 2 permit modification for Fort Bliss's Open Detonation Treatment Unit in accordance with 20.4.1.900 NMAC, incorporating 40 CFR 270.42(b)(6). The effective date of the approval is December 29, 2000. The six (6) changes made to the OD operation permit are included as replacement pages dated December 29, 2000 (see Attachments 1-6). These changes have been incorporated into the Fort Bliss Open Detonation operational permit; Fort Bliss is required to incorporate the attached replacement pages into your permit.

Fort Bliss also requested that HWB "... correct the Permit in accordance with the Class III modification of May, 1996, and the class II modification of July, 1998, respectively". These requested changes have already been issued; NMED approved these changes on May 9, 1996 and July 22, 1998, respectively. HWB forwarded copies of these approvals to Ms. McKernan of your staff on December 19, 2000. Therefore, HWB is not making the requested "corrections" because none are required.

Fort Bliss also provided a revised Part A with all appropriate changes. HWB hereby approves Fort Bliss's revised Part A signed August 30, 2000 (Captain Clarke) and September 10, 2000 (General Green).

In addition, HWB has made a determination that the document is administratively complete. The New Mexico Hazardous Waste Management Fee Regulations 20.4.2 NMAC require assessment of fees when administrative review of a document is complete. HWB will issue an invoice to you under a separate letter. Payment is due within sixty (60) calendar days from the date that you receive the invoice.

Should you need to request an extension of the sixty-day period, the request must be received by the New Mexico Environment Department a minimum of fourteen (14) calendar days prior to the end of the sixty-day period. Should you disagree with the fee assessed, you may file an Administrative Appeal under the provisions of 20.4.2.302.1 NMAC. If you have any questions concerning this permitting action, please call Mr. Glenn von Gonten of my staff at 505-827-1558 (extension 1024).

Sincerely,


Greg Lewis
Director,
Water and Waste Management Division

Attachments (6)

GJL:gvg (HWB)

[HWB-FB-00-003]

Mr. Keith Landreth
December 29, 2000
Page 3

cc: James P. Bearzi, NMED-HWB
Robert S. Dinwiddie, NMED-HWB
Pam Allen, NMED-HWB
John Kieling, NMED-HWB
Cindy Abeyta, NMED-HWB
Glenn von Gonten, NMED-HWB
David Neleigh, EPA Region 6
Reading File and Fort Bliss Red File

ATTACHMENT 1

MODULE I - GENERAL PERMIT CONDITIONS

A. EFFECT OF PERMIT

The Permittee is allowed to treat hazardous waste in accordance with the conditions of this Permit as specified in Module III, Permit Condition B, in compliance with HWMR-7, Part V, 40 CFR §264, Subpart I through O. Any treatment of hazardous waste requiring a permit under the New Mexico Hazardous Waste Management Regulations HWMR-7, Part V and not specifically authorized in this Permit is prohibited. Subject to HWMR-7, Part IX, § 270.4, compliance with this Permit generally constitutes compliance, for purposes of enforcement, with the New Mexico Hazardous Waste Act (§§ 74-4-1 et seq. NMSA 1978) and HWMR-7, Parts I, II, III, and IV to the extent the requirement of those Parts are applicable. The Permittee must also comply with all applicable self-implementing provisions imposed by the Resource Conservation and Recovery Act (RCRA) or HWMR-7, Part VIII. A complete (RCRA) permit consists of this Permit and a U.S. EPA Permit issued under the provisions of the Hazardous and Solid Waste Amendment of 1984 (HSWA) which addresses the portion of the RCRA program for which the State is not authorized. Issuance of this Permit does not convey any property rights of any sort or any exclusive privilege; nor does it authorize any injury to persons or property, any invasion of other private rights, or any infringement of state or local laws or regulations. Compliance with the terms of this Permit does not constitute a defense to any order issued or any action brought under Sections 3008(a), 3008(h), 3013, or 7003 of RCRA; Sections 106(a), 104 or 107 of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (42 U.S.C. 9601 et seq., commonly known as CERCLA), or any other law providing for protection of public health or the environment. [HWMR-7, Part IX, §§ 270.4 and 270.30(g)]

B. PERMIT ACTIONS

B.1. Permit Modification, Revocation and Reissuance, and Termination

This Permit may be modified, revoked and reissued, or terminated for cause, as specified in HWMR-7,

ATTACHMENT 2

requested by the Secretary, a designee, or authorized representative, shall be signed and certified in accordance with HWMR-7, Part IX, §270.11 and 270.30(k).

G. REPORTS, NOTIFICATIONS, AND SUBMISSIONS TO THE SECRETARY

All reports, notifications, or other submissions which are required by this Permit to be sent or given to the Secretary or should be sent by certified mail or given to:

RCRA Permits Program Manager
Hazardous Waste Bureau
New Mexico Environment Department
2044 Galisteo Building A
P.O. Box 26110
Santa Fe, New Mexico 87502

Telephone Number: (505) 827-1557
Facsimile Number: (505) 827-1544

H. CONFIDENTIAL INFORMATION

In accordance with HWMR-7, Part IX, §270.12, the Permittee may claim confidential any information required to be submitted by this Permit.

I. DOCUMENTS TO BE MAINTAINED AT THE FACILITY

The Permittee shall maintain a written operating record of OD activities and laboratory results at the Davis Dome facility at the McGregor Range in compliance with HWMR-7, Part V, 264.73, until closure is completed and certified by an independent, New Mexico registered professional engineer, the following documents and all amendments, revisions and modifications to these documents:

1. Waste Analysis Plan, as required by HWMR-7, Part V, §264.13 and this Permit.
2. Inspection schedules, as required by HWMR-7, Part V, §264.15(b)(2) and this Permit.

ATTACHMENT 3

Delays in the disposal of products that have been determined to be wastes can lead to potentially severe safety problems. The inherent instability of these products greatly increases with time. Therefore, delays caused by requirements to perform time-consuming sampling and analysis may be counterproductive. Additional physical and chemical data will be worthless if the reactive waste detonated or ignited prematurely while sampling the product, or at a storage facility awaiting results of these analyses.

Physical and Chemical Characteristics of Wastes and Residues

Because the sampling and chemical analysis of PEP waste entering the unit is impractical for safety reasons, and because the materials treated may have changed over the years (e.g., initiators changed from black powder to C-4), direct waste characterization will not be done. Instead generator supplied information and process knowledge as well as unclassified literature will be used to document the general contents of the PEP prior to OD activities. Soil sampling will be used to determine what constituents may remain in the OD treatment unit.

Two types of sampling are proposed. These include initial site characterization sampling (and associated compliance sampling) and closure sampling. The first, initial site characterization sampling is discussed below in the section titled "Waste Analysis Plan." Closure sampling is presented in the Closure Plan, Permit Attachment F.

Based on the information in Tables A-3 through A-7, all of the waste accepted for thermal treatment will be considered hazardous prior to treatment because of its explosive or reactive nature. Full hazardous characteristics analyses will not be performed prior to OD in order to avoid the danger associated with excessive handling of such materials and to eliminate costly and potentially dangerous time delays. The waste will be visually inspected prior to treatment to ensure that only appropriate wastes are subjected to thermal treatment, and to ensure that the PEP arriving at the OD treatment unit matches the waste identity designated on one of the appropriate accompanying forms: Government Bill of Lading (GSA Standard Form 1109), requisition tracking form (DD Form 1348), Signature and Talley Record (DD Form 1907), Special Instructions for Motor Vehicle Drivers (DD Form 836), or Motor Vehicle Inspection Report (DD Form 626). [40 CFR 266.203(c)]

Waste Container Management

"Containers" are the shipping containers used to transport PEP from the manufacturer to bunker storage, to the practice range or battlefield for use, or to the OD unit for treatment. Containers are designed for safety and endurance, and are reusable. Therefore, they are reused or recycled after they are used to transport PEP to the OD treatment unit.

The procedures for assuring that PEP materials subject to treatment at the OD unit are not stored for greater than 90 days are:

1. When records indicated that PEP materials in stockpile have reduced military use due to age, the materials are segregated.

ATTACHMENT 4

Frequency of Analysis [HWMR-7, Part V, §264.13(b)(4)]

Initial site characterization sampling will be conducted within 6 months of permit issuance. Biannual sampling will be performed for 2 years following the initial characterization. If the volume of materials treated at the OD Unit does not exceed 5,000 pounds (2,270 kilograms) in subsequent years, sampling will change from biannual to annual. Annual sampling will occur in August, and biannual sampling, if required, will be performed in August and February. The analysis results will be reported to HRMB following each sampling and analysis event.

An expanded sampling event will occur every five years as described in Permit Attachment J.

Monitoring Non-Reactive Waste

Potential wastes that are not destroyed by OD treatment will remain in the soil and be discovered by the proposed sampling.

Location of Plan and Responsible Position

The soil sampling plan will reside with and be updated by:

Director of Environment
Directorate of Environment
USAADACENFB
Attn.: ATZC-DOE
Ft. Bliss, TX 79916-6816

In addition, Fort Bliss must have a copy of the analytical results in the permit kept at Davis Dome in accordance with HWMR-7, Part V §264.73(b)(3).

Additional Requirements for Waste Generated Off-Site [40 CFR 264.13(c)]

Off-site waste (i.e., waste generated outside of the Permittee's facility) can only be received from White Sands Missile Range, a contiguous Government-owned, Department of Defense operated property. These wastes will conform to the requirements of waste generated on Fort Bliss.

Additional Requirements for Ignitable, Reactive, or Incompatible Wastes [40 CFR 264.13(b)(6), 264.17]

The PEP materials treated are known to be ignitable and/or reactive without testing. Therefore, special requirements are directed to safety and they are summarized in the OD operating procedures in Permit Attachment I. For example, potentially hazardous substances are transported directly to the OD treatment unit; smoking is expressly forbidden and sources of ignition are eliminated; and emergency equipment is maintained on the transport vehicle.

ATTACHMENT 5

PERMIT ATTACHMENT G

DESIGN PLAN AND SPECIFICATIONS

Introduction:

The OD unit is used to thermally treat pyrotechnics, explosives, and propellants (PEP) that result from demilitarization of existing stockpiles and off specification material. The operation was begun in 1965, but records are only maintained by the 41st EOD for two years. Using the estimate of 1984 lbs (900 kg) per quarter, the total PEP destroyed at the site is approximately 207,232 lbs (94,000 kg) through 2nd quarter 1993.

Currently, the PEP materials treated at this site are large caliber (non-handheld) munitions, and rocket propellants. Pyrotechnics are rarely treated here. C-4 is used as an initiator. Black powder is no longer used.

The EOD has historically been responsible for ordnance and explosives found off of Ft. Bliss property in New Mexico and west Texas. However, every effort is made to detonate such off-site material where it is located and the current EOD officer has no recollection of off-site materials being treated at the unit. It is the intent of the 41st EOD to continue the policy of detonating in place those explosives found off-site rather than treating them at the OD unit. However, if the need arises, NMED will be contacted and a variance will be requested for the specific waste involved.

Unit Location and Description:

As illustrated in Figure G-1, the OD treatment unit is located in the northern portion of Ft. Bliss Military Reservation on McGregor Range. Exhibits 1,2, and 3 (map pockets, Permit Attachment O) contain details of the area and the treatment unit which is located about 10 mi (16.1 km) east of U.S. Hwy 54 at latitude 32°05'15" North, and longitude 106°04'45" West. As shown on Figure G-2, the unit is on an active portion of McGregor Guided Missile Range within the impact area for ballistic aerial targets (BATs), and the large caliber munitions and guided rockets which are used to destroy the BATs. EOD operations at the unit only occur when McGregor Range is inactive.

The surrounding area is owned by the US government. A minimum of 5.5 mi (8.9 km) radius in any direction, is uninhabited desert, which is used as a firing range, and is secured by Range Control at Davis Dome. Access is from Hwy 54, through McGregor Camp,

ATTACHMENT 6

Procedures Prior to Departure:

Prior to departing the bunker area to the OD unit, trained OD personnel will inspect the vehicles that will be transporting the waste munitions to the OD unit as follows:

Inspection of Vehicles before Loading:

All vehicles will be inspected before loading for compliance with safety regulations prescribed by transportation regulatory bodies and the U.S. Department of Defense. Only vehicles against which no unsatisfactory conditions are noted will be accepted for loading. Vehicles will not be rejected, however, if deficiencies are corrected before loading. Inspection will be made to determine that:

- (1) Fire extinguishers are serviceable.
- (2) Electric wiring is in good condition and properly attached.
- (3) Brakes, steering, and other equipment are in good condition.
- (4) The exhaust system is not exposed to accumulations of grease, oil, gasoline or other fuels and has ample clearance from fuel lines and other combustible materials.

TRAFFIC PATTERNS:

Traffic inside and around the Explosive Ordnance Disposal Demolition unit is limited to Explosive Ordnance Detachment (EOD) personnel. EOD personnel will maintain all approaching roads in serviceable condition.

Materials destined for OD treatment unit will be removed from the McGregor Range storage bunkers and hauled entirely on military roads on the Military Reservation. Trucks moving PEP waste travel east of McGregor Camp using the road to Davis Dome which is maintained and cleared. Trucks moving PEP waste travel east of McGregor Camp using the road to Davis Dome which is asphalt, two lane, and very well maintained. Progressing further eastward toward the treatment unit, there are one and two lane asphalt roads to the various launch areas, one of which leads to the viewing stand and the treatment unit. Nearer to the site, in the impact area of the range, the road becomes unpaved, but well cleared. There is a single road into the site which leads to the ramp which is used to enter the OD excavation.

Materials from White Sands Missile Range (WSMR) destined for OD treatment will be removed from WSMR bunkers and hauled to the OD

treatment unit via the most direct route, using military roads when practicable. Materials will be moved Eastward to Hwy 54 on military roads, and from Hwy 54 to Davis Dome on military roads. Travel on Hwy 54 will be minimized and the precautions specified elsewhere in this permit will be followed.

East of Davis Dome during OD operations there is no reason for traffic except EOD personnel. The EOD unit establishes its base of operation on the unpaved entry road during treatment operations so as to stop any traffic approaching the treatment unit.

Number and Type of Vehicles

The only vehicles on the dirt roads between the viewing stands and the treatment unit during OD operations are carrier trucks appropriate for transport of the waste in its containers, and lighter trucks for personnel transport. There should not be more than four such vehicles in the area at any one time.

During range operations, (i.e., target practice) there will not be any vehicles east of the viewing stands. Any other vehicle movement in the area of the treatment unit (i.e., when there are no OD operations and no Range operations) will be Range personnel conducting maintenance operations or, potentially, reclamation of target materials.

Transfer and Pick-Up Stations

Pickup is at the PEP bunkers on McGregor Range. When loaded the waste materials will be transported directly to the OD unit, without being transferred to another vehicle.

Quantity of Waste Per Movement

The weight of PEP waste per movement, including shipping containers, will not exceed the load limit of the vehicle. However, practically the loads are much less and are not expected to exceed 343 pounds (156 kg) per load.

Route Capacities

The road surface design loads are not known, however, the asphalt roads have supported the trucks transporting PEP, as well as missile carriers and other heavy military equipment, since 1965 with normal maintenance and resurfacing. The unpaved roads are on a very hard base (usually rock) and have previously supported the vehicles involved in treatment operations for many years.



DEPARTMENT OF THE ARMY
HEADQUARTERS, U. S. ARMY AIR DEFENSE ARTILLERY CENTER AND FORT BLISS
1733 PLEASANTON ROAD
FORT BLISS, TEXAS 79916-6816

October 12, 2000

REPLY TO
ATTENTION OF:

Directorate of Environment

Mr. James P. Bearzi, Bureau Chief
Hazardous Waste Bureau
New Mexico Environment Department
P. O. Box 26110
Santa Fe, New Mexico 87502



**RE: Request for Class II Permit Modification for
U.S. Army Air Defense Artillery Center and Fort Bliss
Open Detonation Operational Permit
Permit No. NM 4213720101-01, 8 June 1995**

Dear Mr. Bearzi:

As required by the referenced permit, the Permittee, U.S. Department of Defense, U.S. Army Air Defense Artillery Center and Fort Bliss (Fort Bliss), is requesting a Class II modification for a process change. That change is receipt of off-site waste from White Sands Missile Range (WSMR), a contiguous Department of Defense (DOD) facility. The modification is not for increased quantity limits or for different wastes.

Background

The Permittee has achieved reductions in volume of waste generated and, through annual sampling, documented no significant impact to human health and the environment. It is, therefore, possible and prudent to consolidate DOD open detonation treatment for WSMR and Fort Bliss at the permitted unit.

Requested Changes

The changes requested are:

1. Module I, page 1 of 12, Section A, first sentence, delete "on site¹" and associated footnote.
2. Module I, page 11 of 12, Section G, please update address and telephone numbers for the Hazardous Waste Bureau.
3. Attachment A, page 2 of 30, Physical and Chemical Characteristics of Waste and Residues, last paragraph, last sentence. Replace "on the accompanying manifest(s)." with:

"on one of the appropriate accompanying manifest(s) forms: Government Bill of Lading (GSA Standard Form 1109), requisition tracking form DD Form 1348, Signature and Talley Record (DD Form 1907), Special Instructions for Motor Vehicle Drivers (DD Form 836), or Motor Vehicle Inspection Report (DD Form 626). [40 CFR 266.203(c)]

4. Attachment A, page 6 of 30, Additional Requirements for Waste Generated Off-Site, delete the current sentence and replace it with:

“Off-site waste (i.e., waste generated outside of the Permittee’s facility) can only be received from White Sands Missile Range, a contiguous Government-owned, Department of Defense operated property. These wastes will conform to the requirements of waste generated on Fort Bliss.”

5. Attachment G, page 1 of 5, Introduction, third paragraph, third sentence: Replace "not treating off-Ft. Bliss waste munitions at this time" with: "detonating in place those explosives found off-site rather than treating them at the OD Unit."

6. Attachment I, page 3 of 19, Traffic Patterns: Insert the following after the second paragraph, before the paragraph that starts, “East of Davis Dome...:”

“Materials from White Sands Missile Range (WSMR) destined for OD treatment will be removed from WSMR bunkers and hauled to the OD treatment unit via the most direct route, using military roads when practicable. Materials will be moved Eastward to Hwy 54 on military roads, and from Hwy 54 to Davis Dome on military roads. Travel on Hwy 54 will be minimized and the precautions specified elsewhere in this permit will be followed.”

The following changes are requested to correct the Permit in accordance with the Class III modification of May, 1996, and the Class II modification of July, 1998, respectively.

7. Attachment I, page 1 of 19, Explosive Limits: Replace "343 pounds (156 kilograms) per quarter" with "2,500 pounds (1,135 kilograms) per quarter."

8. Attachment I, page 19 of 19, Sampling and Analysis Plan: Replace "biannually" with "annually."

Copies of the affected pages are enclosed, with requested changes printed in red. Electronic versions of the requested changes were sent to Mr. Glenn von Gonten of the Hazardous Waste Bureau via email on October 12, 2000.

Part A Hazardous Waste Permit Application

Also enclosed is the amended Part A Application, which includes the following changes requested by Mr. von Gonten:

- Item III, A: street address changed to the Directorate of Environment address at Fort Bliss, TX
- Item XII, A: Process Code changed to X01 [Open Detonation]
- Item XIV, B,C: estimated annual quantities changed to 2,000 lbs for each of the five waste codes
- Item XIV, D(1): process codes changed to X01

Your consideration of this request is appreciated and additional justification and/or information can be supplied upon request. Please do not hesitate to call Patricia McKernan at (915) 568-6077 if you have questions or need additional information.

Sincerely,



Keith Landreth
Director of Environment

Enclosures

Copies Furnished:

John Kieling, HRMB
Glenn von Gonten, HRMB
Patricia McKernan, Fort Bliss DOE

PERMIT ATTACHMENT I

STANDARD OPERATING PROCEDURES

Introduction:

The following is a description of the Standard Operating Procedures (SOP) that will be implemented by all Explosive Ordnance Disposal (EOD) personnel of the U.S. Army Air Defense Artillery Center and Fort Bliss. These procedures include the inspection of vehicles that will be used in transporting waste munitions to the OD unit, transportation of the inspected vehicles to the OD unit, and unloading of waste munitions brought by those vehicles. After unloading the waste munitions, the hazardous waste munitions will be subjected to open detonation. Safety criteria are also presented, and the meteorologic conditions under which OD operations will be allowed. Further, medical evacuation of OD personnel accidentally injured during Ordnance Demolition activities is outlined.

Personnel and Explosives limits:

All waste demolition/disposal operations will be analyzed with a view toward reducing personnel and quantity of explosives that could be subjected to an incident.

Personnel limits:

A minimum of two EOD qualified personnel will be exposed for a minimum time to the smallest quantity of explosives consistent with safety requirements and efficiency. One person will be available near the hazard area during explosive operations to give warning and assist in rescue activities in the event of an accident. The safe area will be determined by the senior EOD persons present. Trucks transporting explosive material to demolition site shall meet the U.S. department of transportation (DOT) requirements. Not more than two persons will ride in the cab.

Explosive limits:

Explosive limits will be established for each disposal operation so that each EOD Team Leader will be charged with the responsibility of not exceeding the established limit of ~~343 pounds (156 kilograms)~~ per quarter 2,500 pounds (1,135 kilograms) per quarter.

MAS ① 11/7/1994

Procedures Prior to Departure:

Prior to departing the bunker area to the OD unit, trained OD personnel will inspect the vehicles that will be transporting the waste munitions to the OD unit as follows:

Inspection of Vehicles before Loading:

All vehicles will be inspected before loading for compliance with safety regulations prescribed by transportation regulatory bodies and the U.S. Department of Defense. Only vehicles against which no unsatisfactory conditions are noted will be accepted for loading. Vehicles will not be rejected, however, if deficiencies are corrected before loading. Inspection will be made to determine that:

- (1) Fire extinguishers are serviceable.
- (2) Electric wiring is in good condition and properly attached.
- (3) Brakes, steering, and other equipment are in good condition.
- (4) The exhaust system is not exposed to accumulations of grease, oil, gasoline or other fuels and has ample clearance from fuel lines and other combustible materials.

TRAFFIC PATTERNS:

Traffic inside and around the Explosive Ordnance Disposal Demolition unit is limited to Explosive Ordnance Detachment (EOD) personnel. EOD personnel will maintain all approaching roads in serviceable condition.

Materials destined for OD treatment unit will be removed from the McGregor Range storage bunkers and hauled entirely on military roads on the Military Reservation. Trucks moving PEP waste travel east of McGregor Camp using the road to Davis Dome which is maintained and cleared. Trucks moving PEP waste travel east of McGregor Camp using the road to Davis Dome which is asphalt, two lane, and very well maintained.

Progressing further eastward toward the treatment unit, there are one and two lane asphalt roads to the various launch areas, one of which leads to the viewing stand and the treatment unit. Nearer to the site, in the impact area of the range, the road becomes unpaved, but well

cleared. There is a single road into the site which leads to the ramp which is used to enter the OD excavation.

Materials from White Sands Missile Range (WSMR) destined for OD treatment will be removed from WSMR bunkers and hauled to the OD treatment unit via the most direct route, using military roads when practicable. Materials will be moved eastward to Hwy 54 on military roads, and from Hwy 54 to Davis Dome on military roads. Travel on Hwy 54 will be minimized and the precautions specified elsewhere in this permit will be followed.

East of Davis Dome during OD operations there is no reason for traffic except EOD personnel. The EOD unit establishes its base of operation on the unpaved entry road during treatment operations so as to stop any traffic approaching the treatment unit.

Number and Type of Vehicles

The only vehicles on the dirt roads between the viewing stands and the treatment unit during OD operations are carrier trucks appropriate for transport of the waste in its containers, and lighter trucks for personnel transport. There should not be more than four such vehicles in the area at any one time.

During range operations, (i.e., target practice) there will not be any vehicles east of the viewing stands. Any other vehicle movement in the area of the treatment unit (i.e., when there are no OD operations and no Range operations) will be Range personnel conducting maintenance operations or, potentially, reclamation of target materials.

Transfer and Pick-Up Stations

Pickup is at the PEP bunkers on McGregor Range. When loaded the waste materials will be transported directly to the OD unit, without being transferred to another vehicle.

Quantity of Waste Per Movement

The weight of PEP waste per movement, including shipping containers, will not exceed the load limit of the vehicle. However, practically the loads are much less and are not expected to exceed 343 pounds (156 kg) per load.

- (1) LZ should be away from overhead powerlines, trees, high bushes and boulders.
- (2) LZ should be as flat as possible and free of depressions and ditches.
- (3) Any obstacle should be observable from the air. (If panel markers or other day or nighttime site identification device are available, they should be utilized and well staked down.)
- (4) LZ will be free of all loose objects which could be blown up into the helicopter rotor blades.

SAMPLING AND ANALYSIS PLAN

Within 6 months of issuance of the operating Permit, thereafter ~~biannually~~ annually, and at closure, sampling and analysis of the OD treatment unit soils and/or ash residues will be conducted as described in Permit Attachment J.

MODULE I - GENERAL PERMIT CONDITIONS

A. EFFECT OF PERMIT

The Permittee is allowed to treat hazardous waste ~~on-site~~¹ in accordance with the conditions of this Permit as specified in Module III, Permit Condition B, in compliance with HWMR-7, Part V, 40 CFR §264, Subpart I through O. Any treatment of hazardous waste requiring a permit under the New Mexico Hazardous Waste Management Regulations HWMR-7, Part V and not specifically authorized in this Permit is prohibited. Subject to HWMR-7, Part IX, § 270.4, compliance with this Permit generally constitutes compliance, for purposes of enforcement, with the New Mexico Hazardous Waste Act (§§ 74-4-1 et seq. NMSA 1978) and HWMR-7, Parts I,II, III, and IV to the extent the requirement of those Parts are applicable. The Permittee must also comply with all applicable self-implementing provisions imposed by the Resource Conservation and Recovery Act (RCRA) or HWMR-7, Part VIII. A complete (RCRA) permit consists of this Permit and a U.S. EPA Permit issued under the provisions of the Hazardous and Solid Waste Amendment of 1984 (HSWA) which addresses the portion of the RCRA program for which the State is not authorized. Issuance of this Permit does not convey any property rights of any sort or any exclusive privilege; nor does it authorize any injury to persons or property, any invasion of other private rights, or any infringement of state or local laws or regulations. Compliance with the terms of this Permit does not constitute a defense to any order issued or any action brought under Sections 3008(a), 3008(h), 3013, or 7003 of RCRA; Sections 106(a), 104 or 107 of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (42 U.S.C. 9601 et seq., commonly known as CERCLA), or any other law providing for protection of public health or the environment. [HWMR-7, Part IX, §§ 270.4 and 270.30(g)]

B. PERMIT ACTIONS

B.1. Permit Modification, Revocation and Reissuance, and Termination

This Permit may be modified, revoked and reissued, or terminated for cause, as specified in HWMR-7,

¹~~See definition on page 3.~~

HWMR-7, Part IX, §270.11 and 270.30(k).

G. REPORTS, NOTIFICATIONS, AND SUBMISSIONS TO THE SECRETARY

All reports, notifications, or other submissions which are required by this Permit to be sent or given to the Secretary or should be sent by certified mail or given to:

RCRA Permits Program Manager
Hazardous Waste Bureau
New Mexico Environment Department
2044 Galisteo Street
P.O. Box 26110
Santa Fe, New Mexico 87502

Telephone Number: (505) 827-1557

Facsimile Number: (505) 827-1544

H. CONFIDENTIAL INFORMATION

In accordance with HWMR-7, Part IX, §270.12, the Permittee may claim confidential any information required to be submitted by this Permit.

I. DOCUMENTS TO BE MAINTAINED AT THE FACILITY

The Permittee shall maintain a written operating record of OD activities and laboratory results at the Davis Dome facility at the McGregor Range in compliance with HWMR-7, Part V, 264.73, until closure is completed and certified by an independent, New Mexico registered professional engineer, the following documents and all amendments, revisions and modifications to these documents:

1. Waste Analysis Plan, as required by HWMR-7, Part V, §264.13 and this Permit.
2. Inspection schedules, as required by HWMR-7, Part V, §264.15(b)(2) and this Permit.
3. Personnel training documents and records, as required by HWMR-7, Part V, §264.16(d) and this Permit.

Frequency of Analysis [HWMR-7, Part V, §264.13(b)(4)]

Initial site characterization sampling will be conducted within 6 months of permit issuance. Biannual sampling will be performed for 2 years following the initial characterization. If the volume of materials treated at the OD Unit does not exceed 5,000 pounds (2,270 kilograms) in subsequent years, sampling will change from biannual to annual. Annual sampling will occur in August, and biannual sampling, if required, will be performed in August and February. The analysis results will be reported to HRMB following each sampling and analysis event.

An expanded sampling event will occur every five years as described in Permit Attachment J.

Monitoring Non-Reactive Waste

Potential wastes that are not destroyed by OD treatment will remain in the soil and be discovered by the proposed sampling.

Location of Plan and Responsible Position

The soil sampling plan will reside with and be updated by:

Directorate of Environment
USAADACENFB
Attn.: ATZC-DOE
Ft. Bliss, TX 79916-6816

In addition, Fort Bliss must have a copy of the analytical results in the permit kept at Davis Dome in accordance with HWMR-7, Part V §264.73(b)(3).

Additional Requirements for Waste Generated Off-Site [40 CFR 264.13(c)]

~~No waste generated off of Fort Bliss is accepted for treatment at the OD treatment unit and will not be accepted without first informing and getting permission from NMED>~~

Off-site waste (i.e., waste generated outside of the Permittee's facility) can only be received from White Sands Missile Range, a contiguous Government-owned, Department of Defense operated property. These wastes will conform to the requirements of waste generated on Fort Bliss.

Additional Requirements for Ignitable, Reactive, or Incompatible Wastes [40 CFR 264.13(b)(6), 264.17

The PEP materials treated are known to be ignitable and/or reactive without testing. Therefore, special requirements are directed to safety and they are summarized in the OD operating procedures in Permit Attachment I. For example, potentially hazardous substances are transported directly to the OD treatment unit; smoking is expressly forbidden and sources of ignition are eliminated; and emergency equipment is maintained on the transport vehicle.

Delays in the disposal of products that have been determined to be wastes can lead to potentially severe safety problems. The inherent instability of these products greatly increases with time. Therefore, delays caused by requirements to perform time-consuming sampling and analysis may be counterproductive. Additional physical and chemical data will be worthless if the reactive waste detonated or ignited prematurely while sampling the product, or at a storage facility awaiting results of these analyses.

Physical and Chemical Characteristics of Wastes and Residues

Because the sampling and chemical analysis of PEP waste entering the unit is impractical for safety reasons, and because the materials treated may have changed over the years (e.g., initiators changed from black powder to C-4), direct waste characterization will not be done. Instead generator supplied information and process knowledge as well as unclassified literature will be used to document the general contents of the PEP prior to OD activities. Soil sampling will be used to determine what constituents may remain in the OD treatment unit.

Two types of sampling are proposed. These include initial site characterization sampling and closure sampling. The first, initial site characterization sampling is discussed below in the section titled "Waste Analysis Plan." Closure sampling is presented in the Closure Plan, Permit Attachment F.

Based on the information in Tables A-3 through A-7, all of the waste accepted for thermal treatment will be considered hazardous prior to treatment because of its explosive or reactive nature. Full hazardous characteristics analyses will not be performed prior to OD in order to avoid the danger associated with excessive handling of such materials and to eliminate costly and potentially dangerous time delays. The waste will be visually inspected prior to treatment to ensure that only appropriate wastes are subjected to thermal treatment, and to ensure that the PEP arriving at the OD treatment unit matches the waste identity designated on one of the appropriate accompanying manifest(s) forms: Government Bill of Lading (GSA Standard Form 1109), requisition tracking form DD Form 1348, Signature and Talley Record (DD Form 1907), Special Instructions for Motor Vehicle Drivers (DD Form 836), or Motor Vehicle Inspection Report (DD Form 626). [40 CFR 266.203(c)]

Waste Container Management

"Containers" are the shipping containers used to transport PEP from the manufacturer to bunker storage, to the practice range or battlefield for use, or to the OD unit for treatment. Containers are designed for safety and endurance, and are reusable. Therefore, they are reused or recycled after they are used to transport PEP to the OD treatment unit.

The procedures for assuring that PEP materials subject to treatment at the OD unit are not stored for greater than 90 days are:

1. When records indicated that PEP materials in stockpile have reduced military use due to age, the materials are segregated.

PERMIT ATTACHMENT G

DESIGN PLAN AND SPECIFICATIONS

Introduction:

The OD unit is used to thermally treat pyrotechnics, explosives, and propellants (PEP) that result from demilitarization of existing stockpiles and off specification material. The operation was begun in 1965, but records are only maintained by the 41st EOD for two years. Using the estimate of 1984 lbs (900 kg) per quarter, the total PEP destroyed at the site is approximately 207,232 lbs (94,000 kg) through 2nd quarter 1993.

Currently, the PEP materials treated at this site are large caliber (non-handheld) munitions, and rocket propellants. Pyrotechnics are rarely treated here. C-4 is used as an initiator. Black powder is no longer used.

The EOD has historically been responsible for ordnance and explosives found off of Ft. Bliss property in New Mexico and west Texas. However, every effort is made to detonate such off-site material where it is located and the current EOD officer has no recollection of off-site materials being treated at the unit. It is the intent of the 41st EOD to continue the policy of ~~not treating off Ft. Bliss waste munitions at this time~~ detonating in place those explosives found off-site rather than treating them at the OD Unit. However, if the need arises, NMED will be contacted and a variance will be requested for the specific waste involved.

Unit Location and Description:

As illustrated in Figure G-1, the OD treatment unit is located in the northern portion of Ft. Bliss Military Reservation on McGregor Range. Exhibits 1,2, and 3 (map pockets, Permit Attachment O) contain details of the area and the treatment unit which is located about 10 mi (16.1 km) east of U.S. Hwy 54 at latitude 32°05'15" North, and longitude 106°04'45" West. As shown on Figure G-2, the unit is on an active portion of McGregor Guided Missile Range within the impact area for ballistic aerial targets (BATs), and the large caliber munitions and guided rockets which are used to destroy the BATs. EOD operations at the unit only occur when McGregor Range is inactive.

EPA ID Number (Enter from page 1)										Secondary ID Number (Enter from page 1)									
N	M	4	2	1	3	7	2	0	1	0	1	0	1						

XII. Process Codes and Design Capabilities (Continued)

EXAMPLE FOR COMPLETING ITEM XII (shown in line number X-1 below): A facility has a storage tank, which can hold 533.788 gallons.

Line Number	A. Process Code <small>(From list above)</small>				B. PROCESS DESIGN CAPACITY		C. Process Total Number Of Units	For Official Use Only					
	1. Amount (Specify)					2. Unit Of Measure <small>(Enter code)</small>							
X 1	S	0	2	5 3 3 . 7 8 8					G	0 0 1			
1	X	0	1	10,000 00					lbs/yr	001			
2													
3													
4													
5													
6													
7													
8													
9													
1 0													
1 1													
1 2													
1 3													

NOTE: If you need to list more than 13 process codes, attach an additional sheet(s) with the information in the same format as above. Number the lines sequentially, taking into account any lines that will be used for "other" processes (i.e., D99, S99, T04 and X99) in item XIII.

XIII. Other Processes (Follow Instructions from Item XII for D99, S99, T04 and X99 process codes)

Line Number <small>(Enter #s in seq w/XII)</small>	A. Process Code <small>(From list above)</small>				B. PROCESS DESIGN CAPACITY		C. Process Total Number Of Units	D. Description Of Process	
	1. Amount (Specify)					2. Unit Of Measure <small>(Enter code)</small>			
X 1	T	0	4						In-situ Vitrification
1									
2									
3									
4									

EPA I.D. Number (Enter from page 1)	Secondary ID Number (Enter from page 1)																								
<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 10%;">N</td><td style="width: 10%;">M</td><td style="width: 10%;">4</td><td style="width: 10%;">2</td><td style="width: 10%;">1</td><td style="width: 10%;">3</td><td style="width: 10%;">7</td><td style="width: 10%;">2</td><td style="width: 10%;">0</td><td style="width: 10%;">1</td><td style="width: 10%;">0</td><td style="width: 10%;">1</td> </tr> </table>	N	M	4	2	1	3	7	2	0	1	0	1	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 10%; height: 20px;"></td><td style="width: 10%;"></td><td style="width: 10%;"></td><td style="width: 10%;"></td><td style="width: 10%;"></td><td style="width: 10%;"></td><td style="width: 10%;"></td><td style="width: 10%;"></td><td style="width: 10%;"></td><td style="width: 10%;"></td><td style="width: 10%;"></td><td style="width: 10%;"></td> </tr> </table>												
N	M	4	2	1	3	7	2	0	1	0	1														

XIV. Description of Hazardous Wastes

- A. EPA HAZARDOUS WASTE NUMBER** - Enter the four-digit number from 40 CFR, Part 261 Subpart D of each listed hazardous waste you will handle. For hazardous wastes which are not listed in 40 CFR, Part 261 Subpart D, enter the four-digit number(s) from 40 CFR, Part 261 Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.
- B. ESTIMATED ANNUAL QUANTITY** - For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non-listed waste(s) that will be handled which possess that characteristic or contaminant.
- C. UNIT OF MEASURE** - For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE	CODE	METRIC UNIT OF MEASURE	CODE
POUNDS	P	KILOGRAMS	K
TONS	T	METRIC TONS	M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

D. PROCESSES

1. PROCESS CODES:

For listed hazardous waste: For each listed hazardous waste entered in column A select the code(s) from the list of process codes contained in Item XII A. on page 3 to indicate how the waste will be stored, treated, and/or disposed of at the facility.

For non-listed hazardous waste: For each characteristic or toxic contaminant entered in column A, select the code(s) from the list of process codes contained in Item XII A. on page 3 to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.

NOTE: THREE SPACES ARE PROVIDED FOR ENTERING PROCESS CODES. IF MORE ARE NEEDED:

1. Enter the first two as described above.
2. Enter "000" in the extreme right box of item XIV-D(1).
3. Enter in the space provided on page 7, Item XIV-E, the line number and the additional code(s).

2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form (D.(2)).

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER - Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

1. Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B, C and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
2. In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "Included with above" and make no other entries on that line.
3. Repeat step 2 for each EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING ITEM XIV (shown in line numbers X-1, X-2, X-3, and X-4 below) - A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non-listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

Line Number	A. EPA HAZARD WASTE NO. (Enter code)				B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (Enter code)	D. PROCESS											
	(1) PROCESS CODES (Enter)						(2) PROCESS DESCRIPTION (If a code is not entered in D(1))											
X 1	K	0	5	4	900	P	T	0	3	D	8	0						
X 2	D	0	0	2	400	P	T	0	3	D	8	0						
X 3	D	0	0	1	100	P	T	0	3	D	8	0						
X 4	D	0	0	2									Included With Above					

EPA ID Number (Enter from page 1)

Secondary ID Number (Enter from page 1)

N M 4 2 1 3 7 2 0 1 0 1

XIV. Description of Hazardous Wastes (Continued; use additional sheets as necessary)

Line Number	A. EPA Hazardous Waste No. (Enter code)	B. Estimated Annual Quantity of Waste	C. Unit of Measure (Enter code)	D. PROCESSES							
				(1) PROCESS CODES (Enter code)			(2) PROCESS DESCRIPTION (If a code is not entered in D(1))				
1	D 0 0 3	2,000	P	X	0	1					
2	D 0 0 1	2,000	P	X	0	1					
3	D 0 0 5	2,000	P	X	0	1					
4	D 0 0 8	2,000	P	X	0	1					
5	D 0 0 9	2,000	P	X	0	1					
6											
7											
8											
9											
10											
11											
12											
13											
14											
15											
16											
17											
18											
19											
20											
21											
22											
23											
24											
25											
26											
27											
28											
29											
30											
31											
32											
33											

Please print or type with ELITE type (characters per inch) in the unshaded areas only

EPA ID Number (Enter from page 1)										Secondary ID Number (Enter from page 1)													
N	M	4	2	1	3	7	2	0	1	0	1												

XV. Map

Attach to this application a topographic map, or other equivalent map, of the area extending to at least one mile beyond property boundaries. The map must show the outline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all springs, rivers and other surface water bodies in this map area. See instructions for precise requirements.

XVI. Facility Drawing

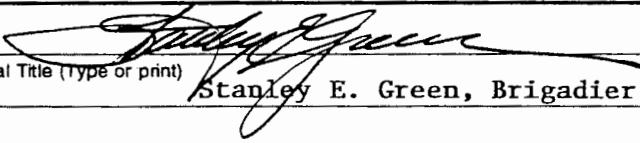
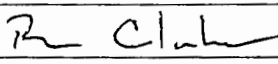
All existing facilities must include a scale drawing of the facility (See instructions for more detail).

XVII. Photographs

All existing facilities must include photographs (aerial or ground-level) that clearly delineate all existing structures, existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas (see instructions for more detail).

XVIII. Certification(s)

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Owner Signature		Date Signed	12 Sep 00
Name and Official Title (Type or print)	Stanley E. Green, Brigadier General, U.S. Army, Commanding		
Owner Signature		Date Signed	
Name and Official Title (Type or print)			
Operator Signature		Date Signed	30 Aug 2000
Name and Official Title (Type or print)	Brian P. Clarke, Captain, EOD, Commanding		
Operator Signature		Date Signed	
Name and Official Title (Type or print)			

XIX. Comments

Note: Mail completed form to the appropriate EPA Regional or State Office. (Refer to instructions for more information)