



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6
1445 ROSS AVENUE, SUITE 1200
DALLAS, TX 75202-2733

MAY 26 1995

(214) 645-6650

Mr. Benito Garcia, Chief
Hazardous and Radioactive Materials Bureau
New Mexico Environment Department
525 Camino De Los Marquez
P.O. Box 26110
Santa Fe, NM 87502

Dear Mr. Garcia:

The Environmental Protection Agency (EPA) has reviewed the draft permit application and closure plan for the thermal treatment unit at Kirtland Air Force Base (KAFB), EPA ID number NM9570024423. The EPA review focused on the Explosive Ordnance Disposal (EOD) Range located adjacent to the thermal treatment unit. The EOD Range is solid waste management unit (SWMU) #6-19 on the KAFB RCRA/HSWA permit. The following comments are provided for your consideration:

1. KAFB should provide a detailed site map locating the new thermal treatment unit and the existing detonation pits at the EOD Range. The current closure plan contains no site maps.
2. KAFB should discuss how, or if, the operations at the thermal treatment unit will impact the detonation pits/EOD Range area.
3. The detonation pits should be explicitly referenced in the closure plan. At a minimum, the closure plan should explain how the material disposed of in the detonation pits, including ordnance material and contraband, will be removed and disposed of. The closure plan should also discuss confirmatory sampling in the excavated pits.
4. EPA recommends that a ^{background} baseline survey of this area be included as a permit condition. The baseline survey should include groundwater quality analysis, particularly since the depth to ground water in this area is shallow.

For major this and RCRA hazardous waste

KAFB1623

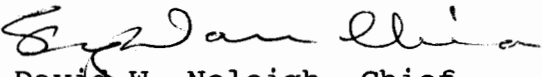


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The EPA may remove SWMU 6-19, the EOD Range, from the KAFB RCRA/HSWA permit pending receipt of the information requested above from KAFB and KAFB's completion of the baseline survey.

Please contact Nancy Morlock of my staff at (214) 665-6650 if you have any questions or require additional information.

Sincerely yours,


for David W. Neleigh, Chief
New Mexico and Federal Facilities
Section, RCRA Permits Branch

cc: Mr. Christopher DeWitt
Kirtland Air Force Base

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**SANDIA NATIONAL LABORATORIES/NEW MEXICO
COMMENTS ON HAZARDOUS WASTE FACILITY DRAFT PERMIT
NM9570024423-OB
ISSUED TO KIRTLAND AIR FORCE BASE FOR
AN OPEN BURN UNIT, 4/14/1995**

Permit Attachment A, Waste Analysis Plan

1. Page 1 of 10, Paragraph 2: The Waste Analysis Plan limits the waste to be treated at the Open Burn (OB) unit to "waste classified by the EPA as D001 and D003 and rags contaminated with these explosives." SNL/NM is listed as a potential generator (Waste Analysis Plan, Table A-2) of waste to be treated at the Kirtland Air Force Base OB unit. Because SNL/NM may generate paper, cloth, polyethylene, activated charcoal, wood, and other types of debris contaminated with explosives that are no more hazardous than "rags," SNL/NM requests that "rags" be changed to "debris such as rags, paper, cloth, polyethylene, activated charcoal, and wood."

2. Page 6 of 10, Paragraphs 1 and 2: The Waste Analysis Plan states that wastes to be treated at the Open Burn (OB) unit are of the "original manufacturers composition, complete with Material Safety Data Sheets (MSDS)." The Waste Analysis Plan goes on to state that the chemical and physical analysis of a representative sample of the waste "may include existing published or documented data on the hazardous waste or on hazardous waste generated from a similar process. The MSDS provided by the original manufacturer fulfills this requirement. The waste that KAFB will be treating in the OB unit has not been chemically altered since their manufacture." SNL/NM understands these statements to mean that in lieu of an MSDS the waste generator can provide equivalent technical information to demonstrate KOP. To be clear and consistent with language in Module I, Permit Condition A and Module II, Permit Condition B.1 (i.e., "...MSDS or equivalent technical information..."), SNL/NM proposes that the Waste Analysis Plan be revised to read "...are of the original manufacturers composition, complete with Material Safety Data Sheets (MSDS) or *equivalent technical information, ...*" and "The *MSDS or equivalent technical information* provided by the *generator* fulfills this requirement."

Permit Attachment D, Personnel Training

3. Page 11 of 12, Inspection Course Outline: "SNL/NM Emergency Preparedness Plan and Procedures Sector Plan" is listed. This SNL/NM document is not applicable to operations or emergency procedures at the KAFB OB unit. "SNL/NM Emergency Preparedness Plan and Procedures Sector Plan" should be deleted from the course outline.