



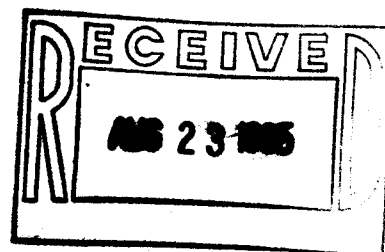
DEPARTMENT OF THE AIR FORCE  
HEADQUARTERS 377TH AIR BASE WING (AFMC)

ENTERED

22 Aug 95

377 ABW/EMC  
2000 Wyoming SE  
KAFB NM 87117-5659

Barbara Hoditschek  
Manager, RCRA Permit Program  
Hazardous and Radioactive Materials Bureau  
2044A Galisteo Rd  
PO Box 26110  
Santa Fe NM 87505



Dear Ms. Hoditschek

Enclosed are the concerns on the Kirtland Air Force Base (KAFB) Explosive Ordnance Disposal (EOD) Facility Open Burn Unit Resource Conservation and Recovery Act (RCRA) Part B permit. Also enclosed is the disk with the concerns that KAFB has on the EOD Open Burn unit Part B permit. KAFB would like to meet with you and Cornelius Amindyas to discuss the Part B permit.

Please contact myself at 846-5037 or Terry Cooper at 846-0007 if you have any questions about KAFB comments.

Respectfully

*Walter S. Darr III*  
WALTER S. DARR III  
Chief, Compliance  
Environmental Management

Attachments:

1. Comments
2. Disk

KAFB1668



**Comments on the Kirtland Air Force Base (KAFB) Open Burn Resource Conservation and Recovery Act (RCRA) Part B Permit Effective 5 August 1995.**

**1. Module I Page 11 of 12:** Address of the RCRA Permit Program Manager needs to be changed to reflect the recent move by the department.

**2. Module I Page 11 of 12, Section I, Paragraph 1:** "The Permittee shall maintain at the personnel bunker located adjacent to the OB treatment unit, unit closure is completed..." The OB unit and personnel bunker are isolated and unmanned. Module I, Section D, Page I-3, Facility is defined as the contiguous land of KAFB. Regulations only require that the records be kept at the facility. Therefore, KAFB recommends the records specified in Section I be kept at the EOD shop, Building 20413 which is the manned facility. Records are less likely to be damaged by the environment at Building 20413. Permit Attachment C, Page 1, Paragraph 2 indicated that the inspection logs are to be maintained at the EOD Shop.

**3. Permit Attachment C, Page 2, Inspection Schedule, Line Item 1:** Fire extinguishers are not stored in the bunker only the vehicles. Suggest that "and stored in the bunker for Class C fires?" be deleted.

**4. Permit Attachment C, Page 5, Paragraph m:** Fire extinguishers are not maintained in the bunker but are brought to the range in vehicles. Therefore the paragraph should read "Fire extinguishers in vehicles and charged."

**5. Permit Attachment D, Section A:** Change AFR 127-100, Chapter 7 to AFI 12-2001.

**6. Permit Attachment E, Page 5, Emergency Coordinator List:** Attached is a new list due to recent personnel changes.

**7. Permit Attachment F, Page 20 First Paragraph:** The paragraph indicates that soil sampling must be done to SWMU 06-19. Is this sampling to occur at the time of closure or now? KAFB assumes that sampling will occur at the time of closure of the new burn pit.

**8. Module III, Page 5, Paragraph J.3.:** The OB treatment unit does not utilize a metal cover. A herculite cover is used that is tied down and does not allow precipitation to enter the burn pit. Therefore, the second sentence of the J.3. should read "The OB treatment unit shall be covered on top with a cover that is water resistant and tied down."

**9. Permit Attachment G, Page 1, "Prevention of precipitation accumulation" section, 3rd sentence:** "A precipitation cover to be used during non-operational periods for prevention of possible accumulation of precipitation, consists of 2 metal sheets that will be tied down to prevent water entering. The sheets of metal will have edges that

come over the side approximately 1/2 inch." As discussed in Comment 8, a metal cover is impractical for the ob unit. A water resistant herculite cover is more practical and will prevent precipitation from entering the ob unit. Therefore the sentence should say: "A precipitation cover will be used during non-operational periods for prevention of possible accumulation of precipitation, that will be secured to the OB unit preventing water from entering. The herculite will have edges that come over the side at least 1/2 inch."

**10. Permit Attachment L, Page 1, First Paragraph:** "The following records will be maintained at OB treatment unit personnel bunker and KAFB Environmental Management Division:". Environmental Management Division does not maintain those records. See Comment 2 on the explanation not to store records at the personnel bunker. Records are maintained at the Explosive Ordnance Disposal Shop, Building 20413. Therefore, suggest that the sentence read: "The following records will be maintained at the Explosive Ordnance Disposal Shop, Building 20413:".

**11. NMED Response to KAFB comments, Page 3, Comment #4:** There seems to be confusion regarding this comment. KAFB interprets the comment resolution and the language change in the permit to say that munitions may be accepted from DOD organizations outside the state of New Mexico. The words "within the State of New Mexico" have been dropped from the permit. Also, Table A-2 indicates that DOD munitions Activates are a potential supplier. This would indicate that munitions from DOD activities may be accepted from outside New Mexico boundaries.

<b>EMERGENCY COORDINATOR</b>	<b>OFFICE PHONE</b>	<b>HOME PHONE</b>
<b>Home Address</b> Ruben Luchenbaugh Building 20413 Kirtland AFB, NM 87117	<b>Area Code 505</b> 846-2229	<b>Area Code 505</b> 846-2229
Andrew Bulter 1714 Perimeter Circle KAFB, NM 87116	846-2229	268-1753
Travis Brewster Building 20351, RM 126B Kirtland AFB, NM 87116	846-2229	265-4260
Robert Measles 7521 Darling Kirtland AFB, NM 87116	846-2229	254-9005
Christian Wiese 1615 Perimeter Dr. Kirtland AFB, NM 87116	846-2229	254-0334
John Barnes 7350 Fairchild Kirtland AFB, NM 87116	846-2229	268-0934
Laurence Sanders 1825 Perimeter Circle Kirtland AFB, NM 87116	846-2229	254-9496
Curtis Keel 7440 Gerris Kirtland AFB, NM 87116	846-2229	255-8192
Richard Burkett 7401 Bradshaw Albuquerque, NM 87108	846-2229	262-2622
Daton Humphries Building 20351, RM 118B Kirtland AFB, NM 87116	846-2229	265-7429
Terry Gray 1001 Tramway Apt #93 Albuquerque, NM 87123	846-2229	294-6806

**Table 5-1**  
**Inspection Form for the OB/OD Units**

	<u>Frequency</u>
1. Are fire extinguishers installed on the vehicles for Class B/2 fires and stored in bunker for Class C fires?	Monthly/before each operation
2. Are Explosive Disposal signs posted on range boundaries (300 ft on perimeter)?	Monthly
3. Are flags and barriers used?	Monthly/before each operation
4. Is minimum safety distance available for the range limit?	Monthly/before each operation
5. Are all combustibles removed within 200-ft radius from burn pit and detonation site?	Monthly
6. Are fire breaks kept clear of combustibles?	Monthly
7. Is a fire-aid kit available?	Before each operation
8. Check serviceability of burn container before each use.	Monthly before each operation
9. Is the facility fence and gate working properly?	Monthly/before each operation
10. Is the Emergency Contingency Plan in place on range?	Monthly/before each operation
11. Do all personnel have their required individual safety equipment?	Before each operation
12. Are all radios/communication equipment working?	Monthly/before each operation
13. Are the loading and unloading areas, burn pit, detonation pit clear of reactive waste?	Monthly/before each operation
14. Is there any structural deformities (i.e., cracks) evidence of deterioration associated with burn pit?	Monthly/before each operation
15. Standing water in detonation pit.	After significant precipitation

damaged, incomplete, or nonoperational upon inspection, EOD personnel will ensure that repairs/replacements are made as soon as practicable. If a hazard appears imminent or if a hazardous situation already exists, operation of the EOD will stop, and remedial action will be initiated immediately. Any remedial action taken pursuant to an inspection will be noted on the inspection schedule.

#### **5.2.1.4 Maintenance Schedule**

The following maintenance schedule is observed at the EOD Facility:

1. Scheduled maintenance of the EOD range will be conducted during the first week of each month.
2. The following items will be checked and corrective action taken when a discrepancy is found.
  - a. Range signs (condition of signs and posts)
  - b. Perimeter gates
  - c. Perimeter flag poles and flags
  - d. Fire Break condition
  - e. Range Road condition
  - f. Bunker Berm
  - g. Demolition range condition (graded, holes filled)
    - (1) Large metal fragments cleaned up
  - h. Burn pit condition (free of debris, covered, gate closed)
    - (1) No treated material laying on the ground
    - (2) Drums sealed
    - (3) Cracks or evidence of pit deterioration
  - i. Run-off berm around the range
    - (1) No holes/cracks
    - (2) Approximately two feet high
  - j. Fence around the demolition range
    - (1) Wire not broken
    - (2) Posts in the ground
    - (3) Signs up and in good condition
  - k. Demolition range gate in good working order
  - l. Emergency contingency plan in the bunker
  - m. Fire extinguishers in the bunker and charged

#### **5.2.2 Specific Process Inspection Requirements**

NMHWMR-7, Pt. V, §264.15(b)(4), requires inspections of specific portions of a facility, rather than the general facility. These include container storage areas, tank systems, waste