



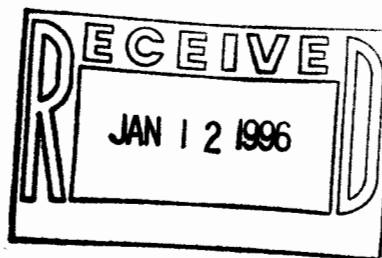
DEPARTMENT OF THE AIR FORCE
HEADQUARTERS 377TH AIR BASE WING (AFMC)

91 ENTERED

11 Jan 96

377 ABW/EMC
2000 Wyoming SE
Kirtland AFB, New Mexico 87117-5659

Barbara Hoditschek
New Mexico Environment Department
Hazardous and Radioactive Materials Bureau
2044A Galisteo
P.O. Box 26110
Santa Fe, New Mexico 87505



Dear Ms. Hoditschek

This is a modification to amend the Kirtland Air Force Base (KAFB) Explosive Ordnance Disposal Facility Subpart X, Open Detonation Part B Permit (NM9570024423-OD). The modification is a change in sampling frequency from quarterly to annually. KAFB has conducted four consecutive sampling events with no significant change in the analytical results. Therefore, KAFB proposes to sample once a year during the last quarter of the government fiscal year which ends 30 September. The sampling has been conducted on a trial basis for a year as recommended by NMED during permit negotiations to establish a baseline. Detonations for the calendar year 95 covered a wide range of chemical constituents that are representative of future treatments.

KAFB also requests that the sampling frequency be changed due to new federal budget restraints. Current yearly costs for sampling the Open Detonation unit is \$248,000.00 or \$62,000.00 per quarter.

KAFB1716



If you have any questions, please contact me at 846-5037 or Terry Cooper at 846-8546.

Respectfully



WALTER S. DARR III

Chief of Compliance

Environmental Management Division

Attachment:
Modification

Module III Permit Attachment J, Page 2, Soil Sampling I: Monitoring Areas Outside the Detonation Pit, Paragraph 1:

To ensure that contamination has not occurred, soil samples will be collected quarterly along eight lines....

Propose Change: To ensure that contamination has not occurred, soil samples will be collected *annually* ~~quarterly~~ along eight lines....

Module III Permit Attachment J, Page 5, Soil Sampling I: Monitoring Areas Outside the Detonation Pit, Paragraph 2:

Data for each sampling event will be...

Propose Change: Data for *the annual* ~~each~~ sampling event will be...

Module III Permit Attachment J, Page 5, Soil Sampling I: Monitoring Areas Outside the Detonation Pit, Paragraph 3:

... to NMED with a summary cover letter as soon as reasonably possible following each sampling event.

Proposed Change: to NMED with a summary cover letter as soon as reasonably possible following ~~each~~ *the annual* sampling event.

Module III Permit Attachment J, Page 5, Soil Sampling I: Contamination Detection, Paragraph 1:

If the quarterly concentration of the contaminant components...

Proposed Change: If the ~~quarterly~~ *the annual* concentration of the contaminant components...

Module III Permit Attachment J, Page 7, Soil Sampling II: Monitoring Areas the Open Detonation Pit, Paragraph 2:

Four vadose zone samples will be taken quarterly from four separate locations...

Proposed Change: Four vadose zone samples will be taken ~~quarterly~~ *annually* from four separate locations...

Module I Permit Attachment E, Page 2, Section 2.0 Emergency Coordinators:

Delete all emergency coordinators currently in this section.

Recommended Change:

	OFFICE PHONE	HOME PHONE
Reuben C. Lukenbaugh	(505) 846-2229	(505) 846-2229
Lawrence W. Sanders	(505) 846-2229	(505) 254-9496
Danton B. Humphries	(505) 846-2229	(505) 265-7429
John C. Barnes	(505) 846-2229	(505) 268-0984

1 **Module III Permit Attachment J, Page 2, Soil Sampling I: Monitoring Areas Outside the Detonation Pit, Paragraph 1:**

To ensure that contamination has not occurred, soil samples will be collected quarterly along eight lines....

Propose Change: To ensure that contamination has not occurred, soil samples will be collected *annually* ~~quarterly~~ along eight lines....

2 **Module III Permit Attachment J, Page 5, Soil Sampling I: Monitoring Areas Outside the Detonation Pit, Paragraph 2:**

Data for each sampling event will be...

Propose Change: Data for *the annual* each sampling event will be...

3 **Module III Permit Attachment J, Page 5, Soil Sampling I: Monitoring Areas Outside the Detonation Pit, Paragraph 3:**

... to NMED with a summary cover letter as soon as reasonably possible following each sampling event.

Proposed Change: to NMED with a summary cover letter as soon as reasonably possible following each *the annual* sampling event.

4 **Module III Permit Attachment J, Page 5, Soil Sampling I: Contamination Detection, Paragraph 1:**

If the quarterly concentration of the contaminant components...

Proposed Change: If the ~~quarterly~~ *the annual* concentration of the contaminant components...

5 **Module III Permit Attachment J, Page 7, Soil Sampling II: Monitoring Areas the Open Detonation Pit, Paragraph 2:**

Four vadose zone samples will be taken quarterly from four separate locations...

Proposed Change: Four vadose zone samples will be taken ~~quarterly~~ *annually* from four separate locations...

Module I Permit Attachment E, Page 2, Section 2.0 Emergency Coordinators:

Delete all emergency coordinators currently in this section.

Recommended Change:

	OFFICE PHONE	HOME PHONE
Reuben C. Lukenbaugh	(505) 846-2229	(505) 846-2229
Lawrence W. Sanders	(505) 846-2229	(505) 254-9496
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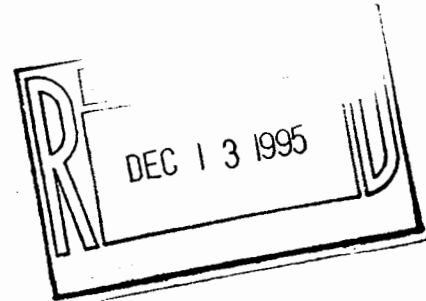


DEPARTMENT OF THE AIR FORCE
HEADQUARTERS 377TH AIR BASE WING (AFMC)

11 December 1995

377 ABW/EMC
2000 Wyoming Blvd SE
Albuquerque NM 87117-5659

Ms. Barbara Hoditschek
New Mexico Environment Department
Hazardous and Radioactive Materials Bureau
P.O. Box 26110
2044A Galisteo
Santa Fe NM 87505




RE: Class II Modification (NM9570024423)

Dear Ms. Hoditschek

This is a modification to amend the Kirtland Air Force Base (KAFB) Part B, Hazardous Waste Operating Permit (NM9570024423). Please add the attached Class II Modifications (Atch 1) to the existing RCRA Part B Permit. The modifications are based on our review of past and present procedures for sampling as well as the current budget restraints for our contract.

If you have any questions, please contact Ms Marsha Carra at (505) 846-7847/5037. We appreciate your help and cooperation.

Respectfully


WALTER S. DARR III
Chief of Compliance
Environmental Management
Division

Attachment:
Class II Modifications

**PART B PERMIT HAZARDOUS WASTE OPERATING
PERMIT
NEW MEXICO ENVIRONMENT DEPARTMENT**

CLASS II MODIFICATION

MODIFICATION REQUEST #1

Permit Attachment II-1

Special Procedures, Structures and Equipment PA-1, P.3/PA II-1, P.4.

Last sentence on Page PA II-1, p.3/PA II-1, p.4 reads:

KAFB will sample the soil beneath the loading dock sump outfall **at least annually** for pH, all **EP Toxicity** metals **and all** organics via GC-MS analysis

change to read

KAFB will sample the soil beneath the loading dock sump outfall **when necessary (after a spill or suspected spill)** for pH, all **TCLP** metals **or** organics via GC-MS analysis.

Atch 1

MODIFICATION REQUEST #2

Permit Attachment II-2 Waste Analysis Plan
PA II-2, p. 5 1st paragraph, reads:

Waste from the steady state continuous process are **retested annually by Kirtland, at a minimum**, or when changes are suspected or occur in the process requiring an update of the profile sheet on file at Kirtland AFB Environmental Management Function and the DRMO. Table C-2 lists the test and rationale for these tests. Generations that do not have a profile sheet on file are tested when they occur using the appropriate tests listed in Table C-2. Flashpoint and EP toxicity tests will be run on all wastes. PH will run on all aqueous wastes and wastes having an aqueous phase.

Change to read:

Waste from the steady state continuous process are retested (**delete “annually”**) by Kirtland, (**delete “at a minimum”**) when changes are suspected or occur in the process requiring an update of the profile sheet on file at Kirtland AFB Environmental Management Function and the DRMO. Table C-2 lists the test and rationale for these tests. Generations that do not have a profile sheet on file are tested when they occur using the appropriate tests listed in Table C-2. **Flashpoint and TCLP Metals tests will be run on all wastes which, through the process the hazardous material is used, indicate this is required. pH will run on all aqueous wastes and wastes having an aqueous phase, as required, due to process knowledge.**

(Kirtland presently has 3-4 years of consecutive sampling for the waste streams generated from a continuous process. With this sampling on file, and the constraints on the budget, is the reasoning for this request).

KAFB CLASS I PERMIT MODIFICATION: OB TREATMENT UNIT

January 30, 1996

The following modifications made to the Kirtland Air Force Base (KAFB) Open Burning Operational Permit issued July 25, 1995 are indicated as follows: Shaded areas indicate added material, while ~~strikeouts~~ indicate deleted material.

ITEM # 1:

Module I, Page 11 of 12:

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 and Radioactive Materials Bureau
New Mexico Environment Department
~~525 Camino de los Marquez~~
2044A Galisteo
P.O. Box 26110
Santa Fe, New Mexico 87502

Telephone Number: (505) 827-1563

Facsimile Number: (505) 827-1544

H. CONFIDENTIAL INFORMATION

In accordance with 20 NMAC 4.1, Subpart IX, §270.12, the Permittee may claim confidential any information required to be submitted by this Permit.

ITEM # 2:

Module I, Page 11 of 12, Section I., Paragraph 1:

I. DOCUMENTS TO BE MAINTAINED AT THE FACILITY

The Permittee shall maintain at the ~~personnel bunker located adjacent to the OB treatment unit~~, EOD Shop, Building 20413 until closure is completed and certified by a New Mexico independent, registered professional engineer, the following documents and all

amendments, revisions and modifications to these documents:

1. Waste Analysis Plan, as required by 20 NMAC 4.1, Subpart V, §264.13 and this Permit.
2. Inspection schedules, as required by 20 NMAC 4.1, Subpart V, §264.15(b)(2) and this Permit.
3. Personnel training documents and records, as required by 20 NMAC 4.1, Subpart V, §264.16(d) and this Permit.
- ~~4. Contingency Plan, as required by 20 NMAC 4.1, Subpart V, §264.53(a) and this Permit.~~
- ~~5. Operating record, as required by 20 NMAC 4.1, Subpart V, §264.73 and this Permit.~~
- 4 6. Closure Plan, as required by 20 NMAC 4.1, Subpart V, §264.112(a) and this Permit.
- 5 7. Contingency Post-Closure plan as per 20 NMAC 4.1, Subpart V, §264.310 and this Permit, in case the Permittee is unable to demonstrate clean closure.
- 6 8. Procedures for Limiting air Emissions, as required by 20 NMAC 4.1, Subpart V, §264.601(c); and Subpart IX, §270.23(c) and this Permit.

The Permittee shall maintain at the personnel bunker located adjacent to the OB treatment unit, until closure is completed and certified by a New Mexico independent, registered professional engineer, the following documents and all amendments, revisions and modifications to these documents.

1. Contingency Plan, as required by 20 NMAC 4.1, Subpart V, 264.53(a) and this Permit.
2. Operating record, as required by 20 NMAC 4.1, Subpart V, 264.73 and this Permit.

ITEM # 3:

Permit Attachment C, Page 2, Inspection Schedule, Line Item 1

1. Are fire extinguishers installed on the vehicles for Class B/2 fires, and stored in bunker for Class C fires?

PERMIT MODIFICATION

7429

Albuquerque, NM 87115

~~Christian Wiese~~

~~Home Address: 1615 Perimeter Dr., KAFB (505) 846-2229
(505) 254-0334
Albuquerque, NM 87116~~

~~Seth T. Stephenson~~

~~Home Address: Bldg. 20352 B Rm. 107 (505) 846-2229 (505) 266-1618
Albuquerque, NM 87115~~

~~Darren Barnes~~

~~Home Address: 1980 San Pablo, KAFB (505) 846-2229 (505) 260-0647
Albuquerque, NM 87116~~

~~Mark S. Dillard~~

~~Home Address: 2021 San Pablo, KAFB (505) 846-2229 (505) 266-3805
Albuquerque, NM 87116~~

~~Scott T. Pearson~~

~~Home Address: Bldg. 20350 B., Rm. 105 (505) 846-2229
(505) 255-8603
Albuquerque, NM 87116~~

EMERGENCY COORDINATORS

OFFICE PHONE

HOME PHONE

(RANGE SAFETY OFFICERS):

Reuben Luckenbaugh (505) 846-2229 (505) 846-2229
(Also EOD Coordinator)

Lawrence W. Sanders (505) 846-2229 (505) 354-9496

Danton B. Humphries (505) 846-2229 (505) 265-7429

John C. Barnes (505) 846-2229 (505) 268-0934

EOD Flight Chief

Address: Bldg. 20413 (505) 846-2229

EOD Range Safety Officer

Address: Bldg. 20413 (505) 846-2229

Kirtland Command Post (505) 846-6432

Names of the EOD Flight Chief and the Range Safety Officers are available at the Kirtland AFB Command Post.

ITEM # 7: Permit Attachment F, Page 20 First Paragraph
No change

ITEM # 8: Module III, Pages 4 and 5, Paragraph J.3.

The Permittee shall not conduct open burning at any given time when the wind speed is greater than 15 miles per hour. The OB treatment unit shall be enclosed on all four sides with a metal top covered on top with a cover that is water resistant and tied down. When the OB treatment unit is not in use a cover shall be placed over the top to keep any wind out thus preventing any ash from spreading between burns.

ITEM # 9: Permit Attachment G, Page 1, Paragraph 4, "Prevention of precipitation accumulation" section, 3rd sentence:

A precipitation cover ~~to~~ will be used during non-operational periods for prevention of possible accumulation of precipitation, ~~consists of 2 metal sheets that will be tied down and secured to prevent water from entering. The sheets of metal Herculite cover will have edges that come over the side approximately 1/2 inch.~~

ITEM # 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; the Explosive Ordnance Disposal Shop, Building 20413;~~

ITEM # 11: NMED Response to KAFB comments, Page 3, Comment #4 (Module II, first full paragraph of Permit Condition C.2.a. on Page 2).

The Permittee shall only receive hazardous waste for treatment at the OB Treatment Unit from the potential suppliers listed in Table A-2. If hazardous waste to be treated at the OB unit comes from a supplier not listed in Table A-2, KAFB will notify NMED within 14 days at which time a determination can be made if a permit modification is warranted.

F. SIGNATORY REQUIREMENT

All applications, reports, or information submitted to or requested by the Secretary, his designee, or authorized representative, shall be signed and certified in accordance with 20 NMAC 4.1, Subpart 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 and Radioactive Materials Bureau
New Mexico Environment Department
2044A Galisteo
P.O. Box 26110
Santa Fe, New Mexico 87502

Telephone Number: (505) 827-1561

Facsimile Number: (505) 827-1544

H. CONFIDENTIAL INFORMATION

In accordance with 20 NMAC 4.1, Subpart 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 at the at the EOD shop, Building 20413, until closure is completed and certified by a New Mexico independently, registered professional engineer, the following documents and all amendments, revisions and modifications to these documents:

1. Waste Analysis Plan, as required by 20 NMAC 4.1, Subpart V, §264.13 and this Permit.
2. Inspection schedules, as required by 20 NMAC 4.1, Subpart V, §264.15(b)(2) and this Permit.
3. Personnel training documents and records, as required by 20 NMAC 4.1, Subpart V, §264.16(d) and this Permit.

4. Closure Plan, as required by 20 NMAC 4.1, Subpart V, §264.112(a) and this Permit.
5. Contingency Post-Closure plan as per 20 NMAC 4.1, Subpart V, §264.310 and this Permit, in case the Permittee is unable to demonstrate clean closure.
6. Procedures for Limiting air Emissions, as required by 20 NMAC 4.1, Subpart V), §264.601(c); and Subpart IX, §270.23(c) and this Permit.

The Permittee shall maintain personnel bunker located adjacent to the OB treatment unit, until closure is completed and certified by a New Mexico independently registered professional engineer, the following documents and all amendments, revisions and modifications to these documents.

1. Contingency Plan, as required by 20 NMAC 4.1, Subpart V, 264.53(a) and this Permit.
2. Operating record, as required by 20 NMAC 4.1, Subpart V, 264.73 and this Permit.

J. PERMIT CONSTRUCTION

J.1. Citations

Whenever paragraphs of this Permit or of the Hazardous Waste Regulations are cited, such citations include all subordinate sections of the cited paragraph. When subordinate sections are cited, such citations include all subsections of the cited paragraphs. All such citations shall be considered an inclusion by reference to this Permit in accordance with Title 20, Chapter 4, Part 1 (i.e. 20 NMAC 4.1), Subpart IX.

J.2. Gender

Whenever the pronoun "he" is used in reference to the Secretary of the New Mexico Environment Department or the Permittee, it is to be read as "she" in any instance where the person of the reference is female.

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 open burning unit will stop, and remedial action will be initiated immediately. Any remedial action taken pursuant to an inspection will be noted on the inspection schedule.

TABLE C-1

Inspection Schedule for the OB Treatment Unit

	<u>Frequency</u>
1. Are fire extinguishers installed on the vehicles for Class B/2 fires?	Monthly/before each operation
2. Are explosive disposal signs posted on range boundaries at 300 feet intervals on the perimeter of the OB treatment unit?	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 feet radius from OB unit?	Monthly
6. Are fire breaks kept clear of combustibles?	Monthly
7. Is a fire-aid kit available?	Before each operation
8. Are the loading and unloading areas and OB treatment unit clear of reactive waste?	Monthly/before each operation
9. Are the facility fence and each gate working properly?	Monthly and before operation
10. Is the Emergency Contingency Plan in place on range?	Monthly/before each operation

- 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 EOD personnel bunker

Internal and External Communications

The OB treatment unit has access to internal and external communications systems, emergency equipment, and water for fire control. However, due to the isolated location and the design of the OB unit, internal communications and internal alarms are not provided. The OB unit is activated only after notifying the Kirtland Command Post (KCP). Whenever hazardous wastes are handled at the OB unit, two persons, at a minimum, are involved in the operation. EOD personnel are equipped with two way radios which can be used to summon assistance if required. In addition, cellular phones are carried by EOD personnel. Two-way radios are used for internal communications with the KCP, KAFB Fire Department, and KAFB Security Police. The OB treatment unit has the required external communication devices and operates in a manner that fully complies with the regulations.

APPENDIX D-2

EXPLOSIVE ORDNANCE DISPOSAL FACILITY:

TRAINING COURSE OUTLINES

(A) TRANSPORTATION OF EXPLOSIVES
(AFI 12-2001, Chapter 7)

<u>Section</u>	<u>Course Topic(s)</u>
1	General Safety Requirements
2	Motor Vehicle Transportation
3	Disposal Range Requirements
4	Disposal Range Procedures
5	Range Safety

(B) INSPECTION OF EXPLOSIVE RESIDUE
(T.O. 11A-1-60, Sections 4 and 6)

<u>Section</u>	<u>Course Topic(s)</u>
1	Standard Safety Guidelines Site Entry Site Control Personal Protective Equipment

of the following Emergency Coordinators will be contacted as an alternative EOD Flight Chief in the absence of the EOD Flight Chief:

EMERGENCY COORDINATORS (RANGE SAFETY OFFICERS):	OFFICE PHONE	HOME PHONE
Reuben Luckenbaugh (Also EOD Coordinator)	(505) 846-2229	(505) 846-2229
Lawrence W. Sanders	(505) 846-2229	(505) 354-9496
Danton B. Humphries	(505) 846-2229	(505) 265-7429
John C. Barnes	(505) 846-2229	(505) 268-0934
EOD Flight Chief Address:	Bldg. 20413	(505) 846-2229
EOD Range Safety Officer Address:	Bldg. 20413	(505) 846-2229
Kirtland Command Post	(505) 846-6432	

Names of the EOD Flight Chief and the Range Safety Officers are available at the Kirtland AFB Command Post.

I. SAMPLING AND ANALYSIS PLAN FOR SOIL MONITORING

I.1. The Permittee shall conduct soil sampling and analysis program in accordance with Permit Attachment J, as required by 20 NMAC 4.1, Subpart V, §264.278 and §264.601(b)(1)(8)(11).

I.2. The Permittee shall carry out ash residue sampling within 24 hours following the last burn event of a given quarter.

I.3. Frequency of Sampling:

Since the depth to the uppermost aquifer at the Open burning treatment unit varies from 80 feet to 143 feet, the Permittee shall implement a quarterly soil sampling and analysis program as described in Permit Attachment J, along radiating lines that originate from the adjacent open detonation treatment unit and go beyond the OB treatment unit.

I.4. Target Constituents:

The Permittee shall analyze for the RCRA regulated metals as described in Permit Attachment A.

I.5. The Quality Assurance/Quality Control program to be implemented shall be as presented in Permit Attachment F.

J. SITE CHARACTERISTICS, RISK ASSESSMENT AND PROTECTION OF ENVIRONMENTAL MEDIA.

J.1. The Permittee shall conduct air and ground water monitoring in accordance with the requirements of 20 NMAC 4.1, Subpart V, §264 Subpart F, when soil sampling indicates contamination has the potential to impact ground water.

J.2. The Permittee shall not carry out open burning operations when there is unauthorized or unescorted personnel in the OB treatment unit and its surroundings.

J.3. The Permittee shall not conduct open burning at any given time when the wind speed is greater than 15 miles

per hour. The OB treatment unit shall be covered on top with a cover that is water resistant and tied down. When the OB treatment unit is not in use a cover shall be placed over the top to keep any wind out, thus preventing any ash from spreading between burns.

- J.4. The Permittee shall not carry out open burning activities on any day when a thunderstorm is imminent or when violent weather threatens within ten (10) miles of the subject treatment unit.
- J.5. The permittee shall operate and maintain the open burning area in order to minimize noise and air emissions or exposure of people and wildlife (on-site and off-site) to toxic or hazardous emissions in accordance with the information contained in Permit Attachment K. The operation shall be conducted in accordance with the requirements set forth in 20 NMAC 4.1, Subpart V, §264.601(c).
- J.6. The Permittee shall not conduct open burning during a snowstorm.
- J.7. The Permittee shall not conduct open burning during a duststorm or sandstorm.
- J.8. The Permittee shall not conduct open burning when there is a range fire.

K. RECORDKEEPING

The Permittee shall develop and maintain all records required to comply with 20 NMAC 4.1, Subpart V, §264.73, and §264.602, and Permit Attachment L.

L. ASH MANAGEMENT PROCEDURES

- L.1. The Permittee shall manage ash/residues from the open burning container device as described in Permit Attachment J.
- L.2. Within 24 hours after each treatment event, Ordnance Disposal personnel shall police the OB device or treatment unit. If waste fragments and metal casings are found, they shall be put into proper containers,

PERMIT ATTACHMENT G

DESIGN PLANS AND SPECIFICATIONS

General Description

The OB treatment unit at the EOD range is located southeast of Manzano Base and approximately 10 miles from the northern perimeter of KAFB (See Figure O-1, Permit Attachment O). KAFB, comprises an area of approximately 52,233 acres and is located in Bernalillo County.

The EOD Open Burning unit is used to thermally treat (i.e., burn) explosive contaminated waste. The waste is in the form of waste ammunition and munitions components. Open burning is facilitated by using a flammable liquid, such as diesel fuel. Waste is not stored at the OB treatment unit and is only present during a planned treatment event. Figure O-2 (Permit Attachment O) is a topographic map showing all of KAFB. Figure O-3 (Also in Permit Attachment O) provides a detailed map of the OB treatment unit. A map scale, date, and north arrow are shown on both Figures O-2 and O-3 (Permit Attachment O). The 100-year floodplain and major surface water bodies within 10 miles (16 km) of the OB treatment unit are shown on Figure O-2. The OB unit is not in a 100-year flood plain.

Design and Construction of the OB Treatment Unit

The OB container device, which is the treatment unit consists of a 30'6" by 10'6" by 8' (9.2 m by 3.2 m by 2.4 m) deep rectangular burn pit constructed of 1-foot (0.3 m)-thick concrete and steel, covered by a metal grate open to the air. Figure O-4 (Permit Attachment O) shows the foundation plan, metal liner floor plan, and catwalk roof plan. The steel liner is 1 inch (2.5 cm) thick. The floor of the OB unit is made of concrete that is 6 inches thick in the middle and 1 foot thick where the walls meet the floor.

Prevention of precipitation accumulation:

The concrete floor of the OB treatment container device is water tight. In addition, liquids will not be treated at the OB unit so leak detection is not required. A precipitation cover will be used during non-operational periods for prevention of possible accumulation of precipitation, and secured to prevent water from

entering. The herculite cover will have edges that come over the side approximately $\frac{1}{2}$ inch. The metal will be aluminum or stainless steel. The use of the aluminum and stainless steel should control any deterioration of the subject structure. Figure O-5 (Permit Attachment O) shows the vertical profile of the OB treatment unit and the EOD personnel bunker from which the burn event will be remotely started. Fig O-6 (Permit Attachment O) is a general index of the drawings, symbols, project location, and location maps.

Double steel doors of the open burn unit can resist 500°F for 1 hour once a week. OB unit doors will remain closed for 24 hours after a burn. Doors shall open such that there is a 10 foot clearance. Door knobs and a padlock system are designed to withstand the high temperature requirements and associated heat blasts. The steel-lined concrete pad is surrounded on three sides by an earthen berm. Secondary containment for the OB treatment unit is provided by the berm that is located less than 100 feet away. A three-strand barbed-wire security fence surrounds the EOD range that contains the OB treatment unit. One lockable gate, located at the entrance road, provides access to the EOD range.

Releases from the OB treatment unit that may be harmful to human health or the environment (i.e., ground water, surface water, or air) are precluded by the location, design, and construction of the OB treatment unit.

PERMIT ATTACHMENT L

RECORDKEEPING

Operating Record:

The following records will be maintained at the Explosive Ordnance Disposal Shop, Building 20413:

- A description and the quantity of each hazardous waste received from each of the generators listed in Table A-2, Permit Attachment A enclosed herein;
- Operating log that describes the type and quantity of hazardous waste treated in the OB treatment unit and the date the waste was burned;
- Records and results of waste analyses performed as specified in 20 NMAC 4.1, Subpart V, §264;
- Reports of any incidents that required the activation of the contingency plan;
- Inspection logs for the last three years;
- Records of monitoring, testing, analytical data, and any corrective actions taken to prevent or mitigate releases of hazardous waste to the environment;
- Training records for EOD personnel;
- Disposal requests and Land Disposal Restriction Certifications for hazardous waste transported to a permitted facility;
- Correspondence and other documents from governmental agencies that affect the OB treatment unit.

Additional Reports:

In compliance with 20 NMAC 4.1, Subpart V, §264.56(j), any release, fire, explosion, or other unusual occurrence that results in implementation of the contingency plan will be noted in the OB operating record and reported in writing within 15 days to the Secretary of the NMED.

C.2. Hazardous Waste from Off-Site Sources

- C.2.a. When the Permittee is to receive hazardous waste from an off-site source (except when the Permittee is also the generator), he must inform the generator in writing that he has the appropriate Permits, and will accept the waste the generator is shipping. The Permittee must keep a copy of this written notice as part of the operating record. [20 NMAC 4.1, Subpart V, §264.12(b)].

The Permittee shall only receive hazardous waste for treatment at the OB Treatment Unit from the potential suppliers listed in Table A-2 as described in Permit Attachment N (EPA Part A Hazardous Waste Application: Permitted Waste Codes and Maximum Quantities) in accordance with Module III, Permit Condition B. Prior to receiving hazardous waste to be treated at the OB unit from a supplier not listed in Table A-2, KAFB will notify NMED within 14 days at which time a determination can be made if a permit modification is warranted. The Permittee shall apply for permit modification as specified in 20 NMAC 4.1, Subpart IX, §270.41 and §270.42, prior to receiving hazardous waste from other off-site locations.

- C.2.b. The Permittee shall not accept any off-site waste if the generator does not provide the information required in the above Permit Condition B.1.

D. SECURITY AND SAFETY PLAN

The Permittee shall comply with the security provisions of 20 NMAC 4.1, Subpart V, §§264.14(b) and §264.14(c) as described in Permit Attachment B.

E. GENERAL INSPECTION REQUIREMENTS

The Permittee shall follow the inspection schedule set out in Permit Attachment C. The Permittee shall remedy any deterioration or malfunction discovered by an inspection, as required by 20 NMAC 4.1, Subpart V, §264.15(c). Records of inspection shall be kept, as required by 20 NMAC 4.1, Subpart V, §264.15(d).

handled and disposed of as a RCRA hazardous waste. Non hazardous waste shall be disposed of properly.

M. PROCEDURES FOR LIMITING AIR EMISSIONS

The Permittee shall operate and maintain the OD area in order to minimize air emissions in compliance with the regulations presented above in the paragraphs under Permit Condition J, and in accordance with 20 NMAC 4.1 Subpart V, §264.601 (c).

N. BASELINE SURVEY OF THE EOD RANGE

The Permittee shall conduct soil background sampling or baseline survey of the explosive ordnance disposal range that includes the permitted OD treatment unit, and the new OB unit. The background soil sampling requirement shall be fulfilled by the background/quarterly soil sampling conducted in accordance with the OD permit. This baseline survey must commence at the issuance of this open burn operational permit. Soil sampling and analysis at the SWMU 06-19 shall be conducted as described on page 20, "Sampling of SWMU 06-19".

The groundwater monitoring shall be conducted using water samples taken from the School Mesa Well (Upgradient well), and the Lake Christian Well (Downgradient Well) (See map, Figure F-1). Both wells are located north, and southwest of the EOD Range (on Figure F-1) respectively. The groundwater monitoring program shall continue on quarterly basis throughout the permitted life of the OB treatment unit. At the end of the sampling and analysis of the EOD range, results of the baseline survey of the EOD range shall be submitted to the U.S. EPA Region 6 for a determination on the SWMU 06-19.