



*Provide World-Class Nuclear Surety,
Expeditionary Forces and Support to Base Operations*



Open Detonation Unit Permit Modification Public Meeting



U.S. AIR FORCE

15 December 2010

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Agenda



-
- **Background - Open Detonation Unit**
 - **Historical Timeline of Permits and Modifications**
 - **Permit Modification Requests**
 - **Next Steps**



Background

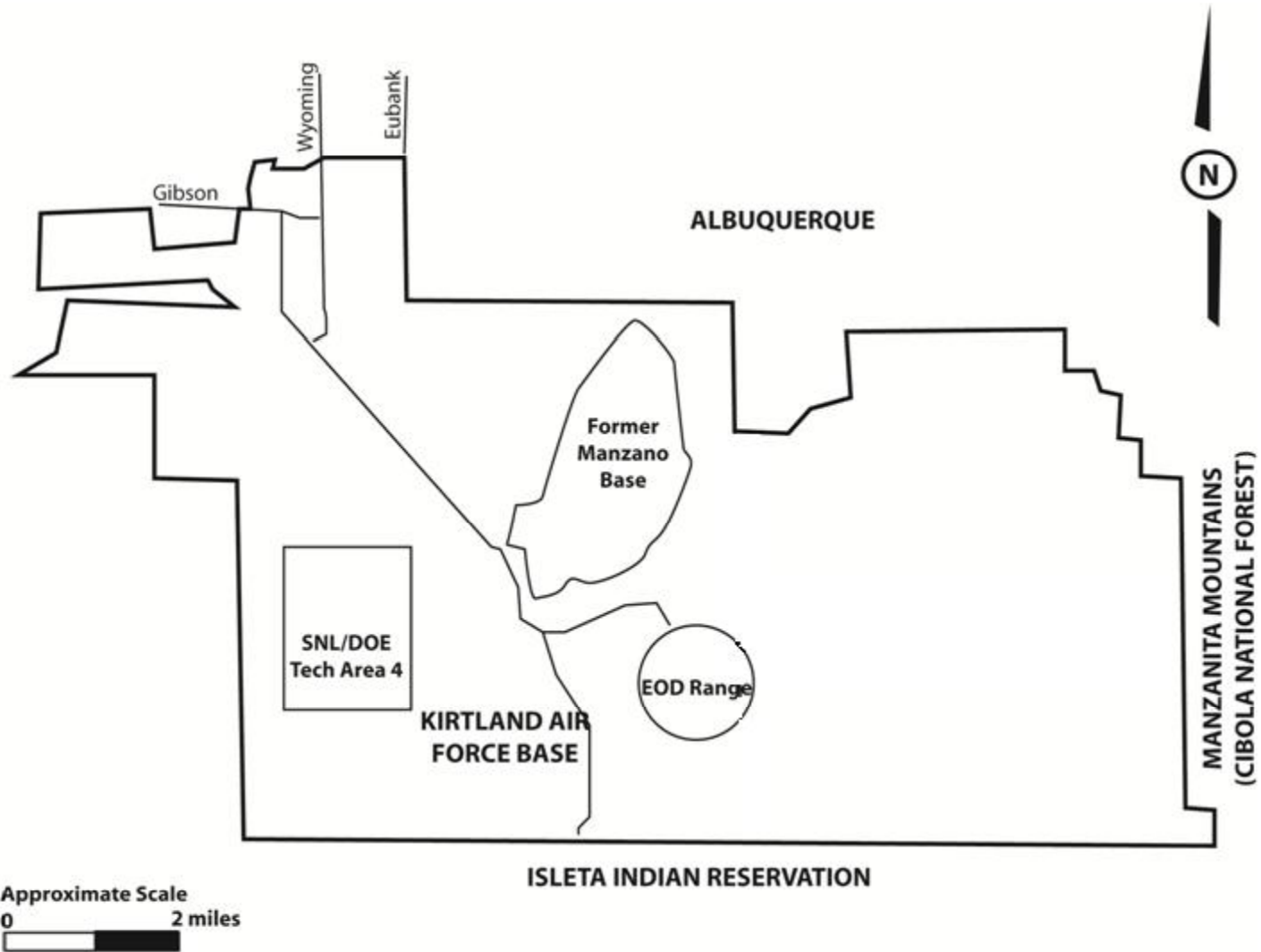


Kirtland Air Force Base Open Detonation Unit

- **Located at the Explosive Ordnance Disposal (EOD) Range**
- **Used for the treatment of expired large caliber munitions and explosives**
- **Resource Conservation and Recovery Act (RCRA) hazardous waste permit issued by the New Mexico Environment Department (NMED) December 1994**
- **Discontinued use of Open Detonation Unit in August 2010**
- **Collocated Open Burn Unit was last used in May 2008, with formal discontinuance of operations in October 2009**
- **Closure plans submitted in October 2010; public meeting held on 16 November with comment period until 16 December**



EOD Range



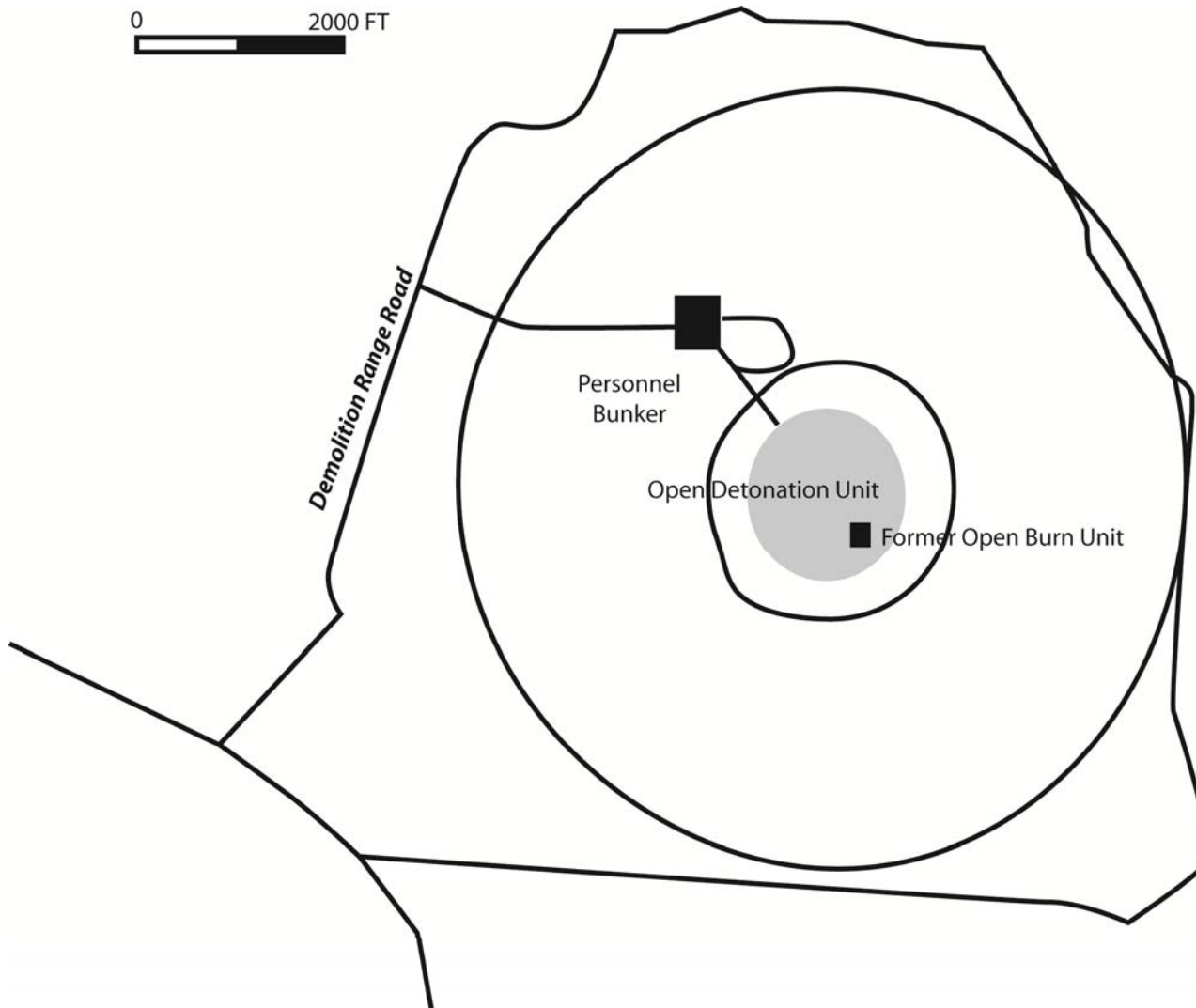
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EOD Range



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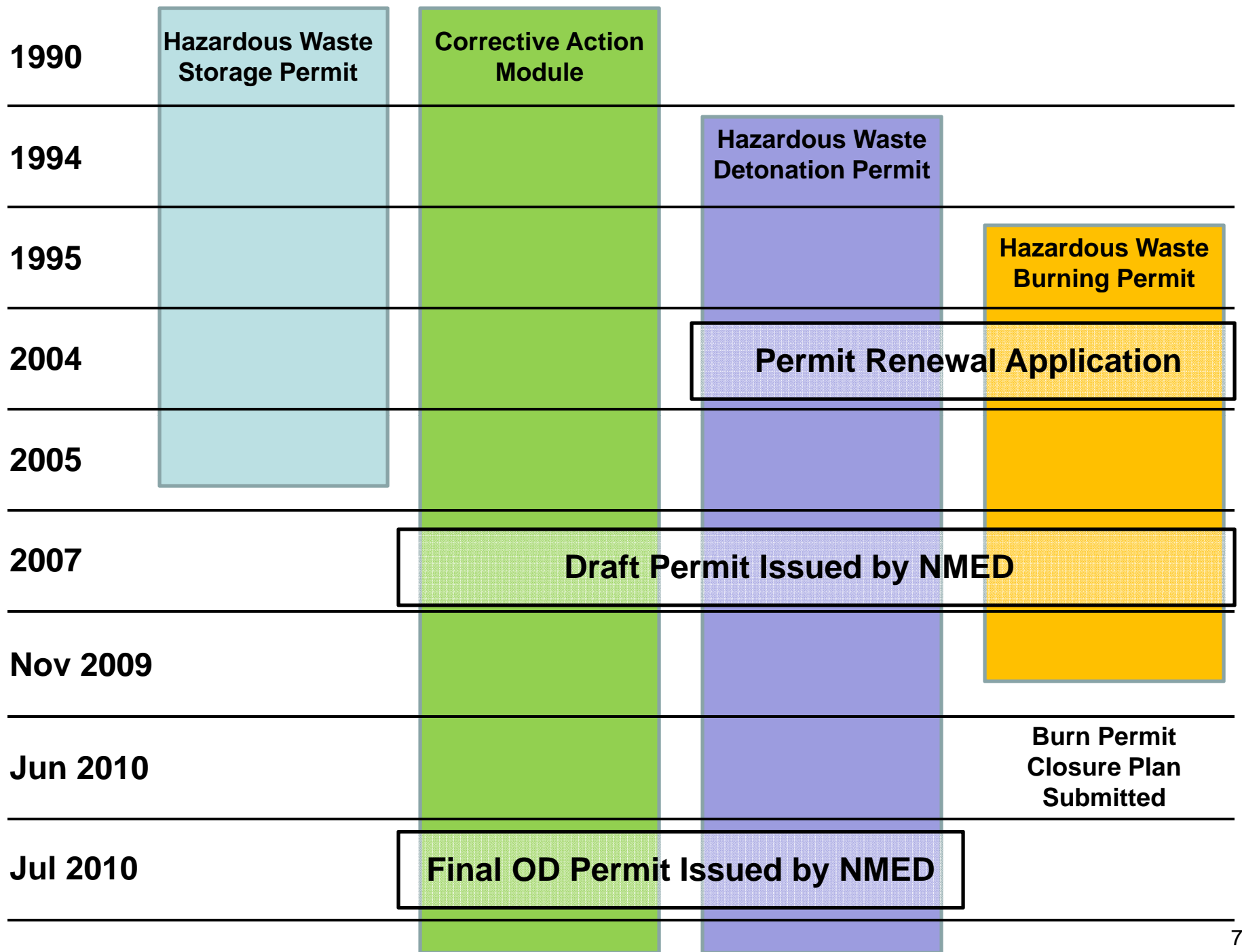
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Timeline of Permits/Modifications



- **Hazardous Waste Storage Permit**
- **Corrective Action Permit**
- **Open Detonation Permit**
- **Open Burn Permit**



Aug 2010

Corrective Action

**Hazardous Waste
Detonation**

Oct 2010

**Detonation Permit
Closure Plan
Submitted**

Nov 2010

**Modifications to
2010 Permit
Submitted**





Modification Requests



-
- **Removal of requirements not applicable to the Open Detonation unit**
 - **Changes to reflect that open detonation unit is being closed**
 - **Stay of Enforcement**
 - **Extension of Deliverable Due Dates**
 - **Request for Temporary Authorization to Implement Open Burn and Open Detonation Closure Activities**



Permit Language Changes



- **Request removal of requirements not applicable to the Open Detonation unit**
 - **Request Open Detonation Permit focus exclusively on the requirements for the Open Detonation Unit**
 - **Request a definition be included for the term “Open Detonation Unit”**
 - **Request basewide Corrective Action requirements be removed; the 1990 Corrective Action (Hazardous and Solid Waste Amendments) Module still applies**
 - **Module provides NMED with regulatory authority**
 - **Has been updated annually**
 - **Can be modified by the NMED**



Permit Language Changes



- **Request reflection of current status of the Open Detonation unit**
 - **Request removal of requirements that are no longer relevant due to imminent closure of open detonation unit (examples: alternative assessment for waste treatment, waste characterization)**
 - **Request revision of language to reflect that there are no longer active operations, only closure operations, occurring (example: The Permittee will conduct OD Unit closure activities between sunrise and sunset.”**
 - **Request replacement of permit closure plan and requirements with closure plan submitted Oct 2010**



Stay of Enforcement



- **Request enforcement of permit requirements be stayed until a decision is made on the permit modification request**



Extension of Due Dates



- **Request that the Operational Compliance Schedule be replaced with that included in revised Open Detonation Closure Plan submitted in October 2010**
- **Request extension on all other deliverables to 90 days from NMED decision on Permit Modification Request**



Temporary Authorization



- Request authorization to proceed with open burn and open detonation unit closure immediately while a final decision on the permit modification request is being considered



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Next Steps



60-Day Written Comment Period

- **Began November 22 2010 (newspaper publication 22 Nov, notification letter mailed to NMED mailing list)**
- **Ends 21 January 2011**
- **Send written comments to New Mexico Environment Department**

Mr. James Bearzi, Chief
NMED Hazardous Waste Bureau
2905 Rodeo Park Drive East, Building 1
Santa Fe, New Mexico 87505

NMED Consideration and Response to Written Comments Received

NMED Grants or Denies Modification Request

- **NMED notification of decision to mailing list**



Questions



Questions?

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