Message

From: Kuziomko, Joseph [kuziomko.joseph@epa.gov]
Sent: 7/31/2017 6:36:04 PM
To: Pena-Molina, Ana [pena-molina.ana@epa.gov]
Subject: FW: ORCR Project regarding OB/OD Sites
Attachments: EPA NMED OB-OD Information (ORCR project) 7-31-17.docx

Best,
Joseph Kuziomko
Intern, US EPA Office of Resource Conservation and Recovery (ORCR)
Potomac Yard South
(703)-347-8168

From: Cobrain, Dave, NMENV [mailto:dave.cobrain@state.nm.us]
Sent: Friday, July 21, 2017 6:14 PM
To: Kuziomko, Joseph <kuziomko.joseph@epa.gov>
Cc: Kieling, John, NMENV <john.kieling@state.nm.us>
Subject: RE: ORCR Project regarding OB/OD Sites

Joseph,

Please find attached a response to your information request on the closure status of the Open Burn/Open Detonation (OB/OD) units in New Mexico. I assigned letter designations to the sites included on your list to facilitate provision of the responses. Please call or email if you have questions.

Dave Cobrain
Hazardous Waste Bureau
New Mexico Environment Department

Direct office phone: 505-476-6055
Main HWB phone: 505-476-6000
Fax: 505-476-6030

From: Kuziomko, Joseph [mailto:kuziomko.joseph@epa.gov]
Sent: Monday, July 17, 2017 10:00 AM
To: Cobrain, Dave, NMENV <dave.cobrain@state.nm.us>; Kieling, John, NMENV <john.kieling@state.nm.us>; Strasser, David, NMENV <david.strasser@state.nm.us>; Maestas, Ricardo, NMENV <Ricardo.Maestas@state.nm.us>; Briley, Siona, NMENV <Siona.Briley@state.nm.us>
Cc: Shuster, Kenneth <Shuster.Kenneth@epa.gov>; Pena-Molina, Ana <pena-molina.ana@epa.gov>; Kohler, Amanda <Kohler.Amanda@epa.gov>
Subject: ORCR Project regarding OB/OD Sites

I am writing to seek information on the closure status of the Open Burn/Open Detonation (OB/OD) units listed below to assist ORCR in a new project to assess closure of OB/OD units. With this information, EPA will be able to identify, evaluate, and document procedures, techniques, and criteria to assess, clean up, and close OB/OD units/sites in a standardized manner.

EPA has been documenting soil and ground water contamination from OB/OD units and the costs to clean them up. Given the inordinate extent of contamination and costs of clean-up that have been reported, we are now seeking to learn more about the monitoring, clean-up procedures, successes, and costs of these efforts. There is currently no national guidance on procedures to assess, monitor, and clean up OB/OD sites, nor metrics to achieve clean closure of OB/OD units. We are requesting information on the clean closure (CC) of OB/OD sites to assist us.

Please first verify the following codes for your facilities in New Mexico.

New Mexico							
FACILITY_ID	**FACILITY_NAME**	**UNIT_NAME**	**UNITs**	**UNIT_DETAIL_SEQ**	**legal status**	**operating status**	**EFFECTIVE_DATE**
NM0890010515	LOS ALAMOS NATIONAL LABORATORY	TA 16-387	62	2	IS	CC	20051110
NM0890010515	LOS ALAMOS NATIONAL LABORATORY	TA 16-394	64	2	IS	CC	20021102
NM0890010515	LOS ALAMOS NATIONAL LABORATORY	TA 16-401SAND FILT	66	3	IS	CC	20050906
NM0890010515	LOS ALAMOS NATIONAL LABORATORY	TA 16-406SAND FILT	67	3	IS	CC	20050906
NM8800019434	NASA JOHNSON SPACE CENTER WHITE SANDS TEST FACILITY	OPEN DETONATION UNIT (ODU)	31	4	PI	CC	20060417
NM4213720101	USADACENFB	OB/OD	3	3	PI	CC	20061221
NM5572124456	US AIR FORCE MELROSE RANGE	OB/OD	1	2	IS	CC	20050708
NM5572124456	US AIR FORCE MELROSE RANGE	OD	2	3	PI	CC	20050708
NM2750211235	US ARMY, WHITE SANDS MISSILE RANGE	OB/OD	10	3	PC	CP	20100108
NM6213820974	FORT WINGATE DEPOT ACTIVITY	OB/OD AREA	1	3	PC	IN	20051201
NM0890010515	LOS ALAMOS NATIONAL LABORATORY	TA 14-23	56	4	IS	IN	20100930
NM0890010515	LOS ALAMOS NATIONAL LABORATORY	TA 39-57 OPEN DET	81	3	IS	IN	20100930
NM9570024423	KIRTLAND AIR FORCE BASE	OPEN BURN	11	3	PI	IN	20091030
NM6213820974	FORT WINGATE DEPOT ACTIVITY	OB/OD AREA	1	3	PC	IN	20051201

Questions:

We have a number of questions we hope you can answer regarding your clean closed/closing sites. The operating status of the facilities will determine which sets of questions are to be answered. We understand that some of this data may be difficult to find but we would really appreciate if you could dig it up for us as it will help us move forward with this project and eventually help EPA update OB/OD closing procedures.

Clean Closed (CC) Facilities' questions:

1. Did these sites complete clean closure or are they still in the process of seeking to clean close?
2. Did the state officially certify/approve the unit(s) Clean Closed (CC)?
3. What was the volume of waste disposed, frequency (e.g., daily, weekly, monthly, periodically), and years of operation?
4. Was it OB or OD or both?
5. What sampling procedures were used to identify the extent of the contamination, including kick-out and fallout (e.g., geophysical techniques used to identify buried munitions and fragments; trenching; grid, spokes, meandering way, visual, or random sampling of soil/for kick-out; depth; until no more found; and ground water monitoring)?
6. Were components of the unit removed (e.g., any platforms, pans, pads, and liners)?
7. What clean-up procedures and techniques were used to clean up the contaminants (e.g., excavation, soil sifting)?
8. What data was recorded and metrics used to evaluate the extent and levels of contamination?
9. What criteria was used to certify clean closure (e.g., EPA action levels)?
10. What was the total cost to achieve Clean Closed (CC) status?

Post Closure (PC, CP) Facilities' questions:

1. Why was Post-Closure Permit (PC) or Closed with Waste in Place (CP) status given (e.g., soil and/or ground water contamination)?
2. What was the volume of waste disposed, frequency (e.g., daily, weekly, monthly, periodically), and years of operation?
3. Was it OB or OD or both?
4. What sampling procedures were used to identify the extent of the contamination, including kick-out and fallout (e.g., geophysical techniques used to identify buried munitions and fragments; trenching; grid, spokes, meandering way, visual, or random sampling of soil/for kickout; depth; until no more found; and ground water monitoring)?
5. Were components of the unit removed (e.g., any platforms, pans, pads, and liners)?
6. What clean-up procedures and techniques were used to clean up the contaminants (e.g., excavation, soil sifting)?
7. What data was recorded and metrics used to evaluate the extent and levels of contamination?
8. What criteria was used to determine that clean closure could not be achieved (e.g., EPA action levels)?
9. What was the total cost to achieve closed status?

Inactive/Closing, but Not Yet RCRA Closed (IN) and Corrective Action and Superfund (CA, SF) Facilities' questions:

1. Are these units seeking to clean close?
2. If so, what criteria is being used to attempt clean closure (e.g., EPA action levels)?
3. What was the volume of waste disposed, frequency (e.g., daily, weekly, monthly, periodically), and years of operation?
4. Was it OB or OD or both?
5. What sampling procedures are being used to identify the extent of the contamination, including kick-out and fallout (e.g., geophysical techniques used to identify buried munitions and fragments; trenching; grid, spokes, meandering way, visual, or random sampling of soil/for kick-out; depth; until no more found; and ground water monitoring)?
6. Were components of the unit removed (e.g., any platforms, pans, pads, and liners)?
7. What clean-up procedures and techniques are being used to clean up the contaminants (e.g., excavation, soil sifting)?
8. What data is being recorded and metrics being used to evaluate the extent and levels of contamination?

9. What is the total cost to date to remediate the site?

We plan to have a contractor gather this information on a select number of sites from the states. The purpose of this current effort is to gather information on the status of cleanup at these sites to help us identify which sites have the best information for our contractor to follow up with. Thus, for this effort, we seek answers to questions 1-4 and the last question in each set, and for the remaining questions we seek whether or not good information exists to answer these questions. We hope to receive this information by July 31st. Thank you for taking time to assist us with this project. If you have any questions, please feel free to reach out to us. Any information that you may be able to provide will be helpful in our project.

Sincerely,

Joseph Kuziomko
703-347-8168

U.S. EPA Headquarters
Two Potomac Yard
2777S. Crystal Drive
Arlington, VA 22202-3553