



**DEPARTMENT OF THE AIR FORCE**

HEADQUARTERS 27TH COMBAT SUPPORT GROUP (TAC)  
CANNON AIR FORCE BASE, NM 87103

*Stacy*

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EID DIRECTOR'S OFFICE

Mr. Richard Mitzelfelt, Director  
Environmental Improvement Division  
New Mexico Health and Environment Department  
1190 St. Francis Drive  
Santa Fe, New Mexico 87503

Re: Modification of Cannon AFB's Part B Operating Permit (NM7572124454)

Dear Mr. Mitzelfelt

As discussed in our NOV response letter, dated 28 Jul 90, Cannon's permit to operate a hazardous waste facility needs to be modified. The required changes are explained below.

1. Module III.B.1. The list of wastes which may be stored in the facility needs to be expanded to include:

Characteristic for Reactivity	D003	1,000lbs.	
Lead Wastes	D008	1,300lbs.	3 55-gal. 115 gals. drums
Mercury Wastes	D009	250 lbs.	
Lindane Wastes	D013	10 gals.	
Methyl Ethyl Ketone Wastes	D035	1,300lbs.	3 55-gal. 115 gals. drums
Discarded Chlorophenol formulations	F027	1,000lbs.	
Epinephrine	P042	10 gals.	
Formaldehyde	U122	10 gals.	
Phenol	U188	10 gals.	
Warfarin	U248	10 gals.	

These wastes are being added for a variety of reasons. Although they are not generated on a regular basis, materials such as lithium batteries (D003), mercury batteries (D009) and pentachlorophenol pallets (F027) may require disposal as a hazardous waste periodically. Lead wastes need to be included in the permit for reasons outlined in the NOV response dated 28 Jun 90. The third group of wastes that are being added are all generated by the hospital. Small amounts (less than 1 gallon per year) lindane, formaldehyde, and phenol will need to be disposed of as hazardous waste either because their shelf life expired or after being in a medical procedure.

*Readiness is our Profession*

2. Module III.B.2. The following wastes need to be segregated as indicated below.

<u>Ignitable Waste</u>	<u>Acute Hazardous Waste</u>	<u>Toxic Waste</u>	<u>Reactive Waste</u>
D035	F027	D008 U188	D003
U122	P042	D009 U248	
		D013	

3. Permit Attachment A-1. The following changes should be made to the Waste Analysis Plan.

a. C-4. These statements about the generation of hazardous waste should be added as listed below.

"The Wheel and Tire shop, the Metals Technology shop and the Propulsion shop each have a bead blaster whose dust is characteristically hazardous due to metals such as lead, cadmium, silver and chromium. Wastes are collected at a satellite accumulation point in the respective shops for later transfer to DRMO."

"The Auto Hobby shop and the Civil Engineering paint shop generate small quantities (5-10 gallons per year) of paint related waste in the course of routine operations. Wastes are collected at a satellite accumulation point in the respective shops for later transfer to DRMO."

"The base hospital generates small quantities (less than 1 gallon per year) of phenol, lindane, and formaldehyde in the course of routine operations. On occasion outdated or off specification phenol, warfarin, epinephrine and formaldehyde must also be turned in as hazardous waste. All wastes are collected at satellite accumulation points in the hospital for later transfer to DRMO."

b. C-5. Three minor changes need to be made to reflect current base operations.

(1). Para 1. In the first sentence delete "and wipe down material."

(2). Para 1. Delete second sentence.

(3). Para 2. In the second sentence delete "B & B 3100."

c. C-10. In order to satisfy the requirements of 40 CFR 268, Land Disposal Restrictions, the following paragraph needs to be added to the end of the page. (In an NOV response dated 23 Sep 88, a similar paragraph was inserted on this page to meet the requirements of the "first third" ruling. This inclusion, however, was inadvertently left out of the final permit).

"In accordance with 40 CFR 268, Land Disposal Restrictions, Cannon will notify the receiving facility of all restricted and prohibited wastes requiring treatment prior to land disposal with the following reference, 'These wastes should be treated to the standards set by 40 CFR 268 Subpart D as applicable.' Additionally, a Restricted Waste Notification form as shown in Figure C-1a will accompany all restricted wastes. Test results or knowledge of process may be used to determine if the waste is restricted from land disposal."

d. In order to allow Cannon to have samples analyzed at a lab other than the USAF Occupational and Environmental Laboratory (OEHL) the following changes should be made to the permit.

(1) C-14, Para 2. (a). At the end of the first sentence add: "or another EPA certified lab which has been approved by the NMEID."

(2) C-19 Para C.2.g. In the first sentence change "USAF OEHL" to "an approved lab." In the third sentence change "OEHL" to "Lab."

e. References to EP Toxicity Tests need to be replaced by Toxicity Characteristic Leaching Procedure (TCLP) tests in order to comply with the upcoming changes to 40 CFR 261, effective 25 Sep 90.

(1) C-16. Para 1. Change "EP Toxicity" to "TCLP".

(2) C-17. Figure C-3. Change "EP Tox." to "TCLP".

4. Permit Attachment A-2. The "Test Methods for Evaluating Solid Waste" table needs to be updated to reflect the additional wastes identified in this modification and the incorporation of the TCLP.

a. Replace "Extraction Procedure (EP) Toxicity Method" with "Toxicity Characteristic Leaching Procedure (TCLP)."

b. The new waste codes identified in the first section need to be integrated into the table.

c. The Method Numbers for all of the toxic wastes needs to be updated. At present this information is not available to us. It would be appreciated if you could supply this information for the modification.

5. Permit Attachment E-2. D-13a. The new wastes identified in this modification need to be inserted in the "Description of Containers To Be Used to Store Hazardous Wastes at DRMO-Cannon."

a. The following materials should be added to the "Potassium dichromate, DDT" listing: "Formaldehyde, Epinephrine, Lindane and Warfarin."

b. Add the following to the table:

"Phenol	Various	173.349	IAW 49 CFR 173.349"
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6. Permit Attachment F. There are two minor changes which need to be made to the Contingency Plan.

a. G-29. Para 3. In the second sentence change "twenty thirty gallon drums" to "twenty eighty-five gallon drums."

b. G-33. Table G-4. Delete requirement for "MSA Ultra Twin Respirator and cartridges" from equipment list. DRMO personnel are not authorized hazard pay, and therefore, cannot use this equipment. Cannon's Fire Department, however, does maintain Self Contained Breathing Apparatus suits on its Spill Response Van.

The above changes, except for ones in the modules, have been incorporated into the text of the permit. Copies of the affected pages have been included as attachments to this letter.

Until this modification can be finalized Cannon is requesting a waiver letter authorizing the storage of up to 100 lbs. of D009, mercury wastes. This would allow the small number of mercury batteries which are periodically generated on base to be turned in.

Any questions concerning these changes to our operating permit may be directed to Mr. Jim Richards at (505) 784-4639.

Sincerely

  
DAVID E. BENSON, Colonel, USAF  
Commander

2 Atchs  
1. Notification Form  
2. Modified pages (10)



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C.2 Waste Analysis Plan [40 CFR 264.13(b) and (c) and 264.341;  
NM HWMR 206.B.3.b. and c. and 206.D.8.b.]

Cannon Air Force Base generates, stores and treats hazardous wastes in the course of routine aircraft maintenance operations. The intent of this waste analysis plan is to summarize the manner in which hazardous materials will be tracked, once they are purchased for use, and how they will be analyzed for chemical/physical characteristics to insure proper handling, storage and treatment in accordance with New Mexico Hazardous Waste Management Regulations.

Corrosion Control is a aircraft spray painting operation that uses several types of paints and solvents in the process of maintaining the exterior finish of aircraft and some aircraft ground equipment. The facility consists of a hangar area where painting is accomplished, an administrative area and an outdoor accumulation point.

The Munitions Maintenance area uses small amounts of paint and thinner to paint the exterior of practice bombs. A paint booth is installed in a building in the Munitions area for painting. Wastes are collected and stored in a satellite accumulation point for later transfer to DRMO.

The Transportation Paint Shop uses materials similar to Corrosion Control to paint Air Force vehicles. Vehicles are painted inside a paint booth. Wastes are collected at a satellite accumulation point.

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The Jet Engine Shop performs maintenance on the F-111D jet engines. They use Carbon Remover.

The Wheel and Tire shop, the Metals Technology shop and the Propulsion shop each have a bead blaster whose dust is characteristically hazardous due to metals such as lead, cadmium, silver and chromium. Wastes are collected at a satellite accumulation point in the respective shops for later transfer to DRMO.

The Auto Hobby shop and Civil Engineering paint shop generate small quantities (5-10 gallons per year) of point related waste in the course of routine operations. On occasion outdated or off specification phenol, warfarin, epinephrine and formaldehyde must also be turned in as hazardous waste. All wastes are collected at satellite accumulation points in the hospital for later transfer to DRMO.

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Corrosion Control accumulates their wastes (slop paint) in an outdoor storage area.

The Jet Engine Shop (Bldg 680) also accumulates wastes in an outdoor storage area. They segregate and accumulate waste Freon 113 and Carbon Remover. See page C-5a thru C-5d for waste analysis concentrations generated by the above hazardous waste generators.

The DRMO on Cannon AFB disposes of the waste accumulated at Corrosion Control and any other wastes generated on Cannon AFB. The DRMO may accept, upon written request, hazardous waste from Reese AFB, near Lubbock, Texas. Waste streams and processes are identified in Appendix C-2.

DRMO-Cannon will only accept hazardous wastes for which it is permitted. Periodically, DRMO-Cannon will inform each generating activity of the hazardous wastes it is permitted to receive and store. DOD has issued specific regulations that govern the transfer of hazardous wastes and are applicable to all generators of hazardous wastes that transfer such wastes to DRMOs. These

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(1X) Regional Environmental Specialist (Who has more reference documents on hand).

Figure C-2 is an example of the data output obtained from the Hazardous Materials Information System for acetone, a Group I item listed in Appendix C-1. It provides an example of the detail of information which can be obtained through HMIS, without requiring a sample of the item to undergo laboratory analysis. The NSN for this item is 6810-00-184-4796, and it consists of 100 percent acetone. DRMO-Cannon can identify this compound as ignitable. The handling and storage information indicates that acetone should be stored in an area away from heat, sparks, and open flames, and separated from strong oxidizers, nitric/sulfuric acid mixtures, and chloroform. To fight fires involving this chemical, a type of dry chemical extinguisher should be used. Small spills can be removed with absorbent materials, while large spills should be contained and pumped into appropriate containers.

The above discussion of Group I waste items is intended to meet the requirements of paragraph 40 CFR 264.13(a)(2), which indicates that existing published or documented data on the hazardous waste may be used to meet the general waste analysis requirements.

Hazardous material/waste generators will segregate all materials/wastes as much as possible so as to maintain identity of the materials. Corrosion Control, for instance, will segregate wipe down material (50% toluene and 50% MEK) from unused and slop paint.

Any material that is not mixed with other materials (solvents used to clean Parts, for example) will be returned to its original container.

In accordance with 40 CFR 268 Land Disposal Restrictions, Cannon will notify the receiving facility of all restricted and prohibited wastes requiring treatment prior to land disposal with the following reference, "These wastes should be treated to the standards set by 40 CFR 268 Subpart D as applicable." Additionally, a completed "Restricted Waste Notification" form as shown in Figure C-1a will accompany all restricted wastes. Test results or knowledge of process may be used to determine if the waste is restricted from land disposal.

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Copies of the current quantitative analysis will be maintained at SGPB and copies will be kept by the Environmental Coordinator (DEEV), the Defense Reutilization Marketing Office (DRMO) and by the waste generator in accordance with Section XIII (Record Keeping Requirements) of the base Hazardous Waste Management Plan.

2. Identity Unknown. If the identity of a material/waste is unknown, the material will be tested for the parameters listed in Section C.2.c.(1). Sampling procedures outlined in Section C.2.e. will be followed.

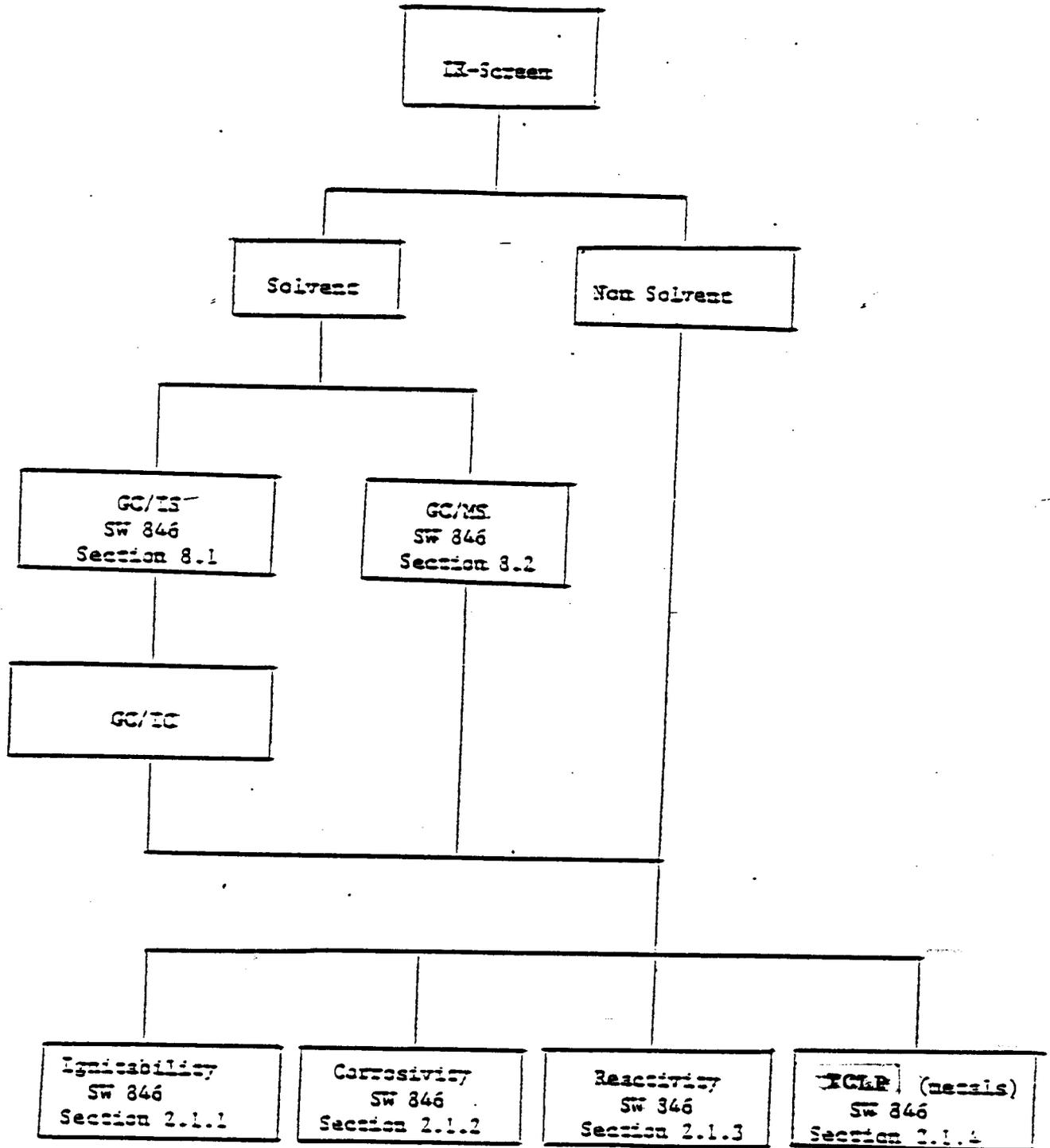
(a) SGPB will verify the chemical composition of the materials by obtaining a sample of the material and request qualitative analysis by USAF Occupational and Environmental Health Laboratory (OEHL), Brooks AFB, Texas or another EPA certified lab which has been approved by NMEID. Unused unopened materials will not require analysis as long as the container has not been opened and the identity is visible and legible on the container label.

(b) Samples will be preserved and packaged according to instructions in the USAF OEHL Recommended Sampling Procedures manual. Reusable cold packs will be used for temperature control. The containers will be made of insulated material and sealed.

C.2.b. Additional Requirements for Wastes Generated Off-Site [40 CFR 264.13(c)]

DRMO-Cannon may, on written request, accept waste from Reese AFB in Lubbock, Texas. These shipments and any other waste received at the facility through a Memorandum of Understanding will be inspected by DRMO-Cannon in order to assure proper identification by the generator.

FIGURE C-3  
IDENTIFICATION PROCESS FLOW CHART



NOTE: Updated SW-846 method numbers included in Permit Attachment II-1A.

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lined lid. Although this will not ensure a representative sample, it will identify all possible constituents.

C.2.f. Sampling Frequency.

C.2.f.(1) Continuous processes will be sampled annually. C.2.f.(2) Intermittent processes will be sampled upon request for turn-in to DRMO.

C.2.f.(3) Process Changes requiring a change in chemical useage will be reported to SGPB by all organization on Cannon Air Force Base whereupon SGPB will determine new sampling requirements.

C.2.g. Chain of Custody. Samples will be sent to an approved lab in a sealed container. A Chain-of-custody record (figure C-4) will be filled out, signed and placed in a plastic bag along with the usual sample submission form (see figure C-5) and sealed in the shipping container. A duplicate will be kept by SGPB with the duplicates of the sample submission forms. Lab personnel will acknowledge receipt of the samples in good condition by signing the Chain-of-Custody form and returning it to Cannon AFB. If the container is damaged in any way or not sealed when the lab receives the package, the technician will so annotate on the form.

2. Record Keeping. Sample results (along with Chain-of-Custody forms) will be maintained at SGPB and copies will be kept by the generator, Environmental Coordinator (DEEV), and by the Defense Reutilization and Marketing Office (DRMO) in accordance with Section XIII (Record Keeping Requirements) of the base Hazardous Waste Management Plan.

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TABLE D-1 (Continued)

HAZARDOUS MATERIAL	DOT CONTAINER CODE	APPLICABLE DOT REGULATION SECTION	CONTAINER DESCRIPTION GENERAL PACKING REQUIREMENT
Trichloro-ethylene, Tetrachloro-ethylene, 1,1,1 Tri-chloroethane	None	173.805	IAW 49 CFR 173.605
Naptha Methyl alcohol, Petroleum ether	Metal Drums 17C Various	173.119	IAW 49 CFR 173.119
Mercury	Various	173.860	IAW 49 CFR 173.860
Potassium dichromate, DDT, <del>Chloroform</del> Formaldehyde, Epinephrine, Lindane and Warfarin	None	173.510	IAW 49 CFR 173.510
Zinc phosphide	Various	173.365	IAW 49 CFR 173.365
Phenol	Various	173.349	IAW 49 CFR 173.349

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10. Telephonic and message notification of other Federal and state agencies must be made promptly following telecon notification of reportable spill to TAC/DEEV. These agencies (New Mexico Environmental Improvement Division, Santa Fe, New Mexico (505) 827-9329) will be notified within 24 hours of any hazardous substance spill, regardless of quantity.

Most waste spills and leaks at the HWSF are easily contained within the berms and grated trenches, and can be collected with absorbent materials or pumped into a container. The contaminated area can then be flushed with water, or some other appropriate solvent. The rinsate and any contaminated absorbents will also be containerized for disposal.

DRMO will have in stock five eighty-five gallon overpack containers. 27 CSG/DEV or the Fire Department Spill kit will contain twenty fifty-five gallon drums and twenty eighty-five gallon drums in stock at all times. These drums will be the types approved under DOT and military container specifications.

The final rinsate of equipment and the facility will be analyzed for appropriate parameters (see Section C), depending on materials involved in the spill. A minimum of four samples will be taken.

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TABLE G-4  
DRMO EMERGENCY EQUIPMENT LIST  
TSDf BUILDING 226 CAFB, NM

EQUIPMENT -----	LOCATION -----	PHY. DESCRIPTION -----
YALE 'EE' Electric Forklift	Bldg. 226	Good
Manual Drum lift	Bldg. 226	Good
Manual Pallet Jack	Bldg. 226	Good
Safe Step (AD) Sorbent	Bldg. 226	Good
85-Gallon Over Pack Drums	Bldg. 226	Good
Broom	Bldg. 226	Good
Nonsparking Shovel	Bldg. 226	Good
Bronze Bung Wrench	Bldg. 226	Good
Every Ready First Aid Kit	Bldg. 226	Good
4'X 4' Plastic Bags	Bldg. 226	Good
Chemical Resistant		
Plaxtic Footwear Covers	Bldg. 226	Good
Disposal Shoe Slip Clovers	Bldg. 226 & 215	Good
Rubber Over Boots, Black	Bldg. 226 & 215	Good
Short unlined rubber gloves	Bldg. 226 & 215	Good
Lined rubber gloves	Bldg. 226 & 215	Good
Sol-vex Long, Blue gloves	Bldg. 226 & 215	Good
Neoprene Chemical Protective pioneer style	Bldg. 226	Good
Leather gloves by Ketch All Company	Bldg. 226	Good
Aural (Ear) protector	Bldg. 226	Good
Goggles, Cesco	Bldg. 226	Good
Goggles, Splash, sun, wind	Bldg. 226	Good
Eye protection glasses w/side shields	Bldg. 226	Good
Apron, Rubber, White	Bldg. 226	Good
Acid Protection Suit, Yellow, Rubber Rain Coat and pants	Bldg. 215	Good
Snap Button Type Rain Boots	Bldg. 215	Good
Coveralls, Yellow, Disposal	Bldg. 226	Good
1 piece Coveralls, White Disposal	Bldg. 215	Good
Face Shield, Industrial	Bldg. 226	Good
White Safety Hat, Sentry	Bldg. 226	Good