



DEPARTMENT OF THE AIR FORCE
HEADQUARTERS 27th FIGHTER WING (ACC)
CANNON AIR FORCE BASE NEW MEXICO

Make, Arme & file

02 JUN 1998

Colonel James A. Thomas III
Commander, 27th Support Group
110 E Sextant Avenue Suite 1098
Cannon AFB NM 88103-5323

Mr. John Tymkowich
New Mexico Environment Department
RCRA Enforcement Branch
Hazardous and Radioactive Materials Bureau
525 Camino De Los Marquz
P O Box 26110
Santa Fe NM 87502

Dear Mr. Tymkowich

I am writing to inform you of an inadvertent violation of RCRA regulations by Cannon Air Force Base (AFB).

On 31 Mar 98, the Cannon AFB contractor, Safety-Kleen, picked up used oil from multiple locations on the base and the downtown Clovis area. On 20 Apr 98, Safety-Kleen informed Cannon AFB that the used oil collected on the 31 Mar 98 pickup had tested positive for halogenated solvents and was being held for further evaluation. Attachment 1 provides the analysis results. On 21 Apr 98, Safety-Kleen and Cannon AFB personnel pulled samples for laboratory analysis from all sources which had been serviced by the contractor on 31 Mar 98.

Safety-Kleen notified Cannon AFB of the sampling results on 29 Apr 98 at 3:00 PM. Cannon AFB waste oil collection points had tested positive for the halogenated contaminant at three locations. Contaminated waste oil from the three locations had resulted in the fouling of the entire waste oil shipment and the violation of RCRA hazardous waste rules for not having manifested hazardous waste prior to shipment, delivering waste to a non-permitted hauler, and crossing state lines with a non-placarded hazardous waste.

Cannon AFB took immediate steps to correct this situation. Recovery of the hazardous waste for proper manifesting and disposal at a licensed Temporary Storage & Disposal Facility (TSDF) is being pursued and will be accomplished expeditiously. All proper manifest documentation will be provided to the NMED in a report detailing the incident to closure.

In the future, we plan to prevent any reoccurrence by having two independent sources of sampling performed prior to pickup of the waste oil at each source. Cannon AFB has acquired a portable halogen detector for use as one of the independent tests. The contractor will perform

similar tests independently. Cannon AFB is also investigating the source of the halogenated solvents and will take positive steps to ensure fouling of the base's waste oils does not occur.

If you have any questions, please contact Mr. John Pike at (505) 784-1092 or Mr. Sanford Hutsell at (505) 784-6378, of my Environmental Flight.

Sincerely


JAMES A. THOMAS III, Col, USAF

Attachment:
Analysis Results

cc:
File



24-Apr-1998

Technical Services Report

HAZMART

Customer: Cannon Air Force Base
Branch/Submitter: 600901
Sample Type: Technical Services
Line of Business: 28
General Description: Used Oil PCB8-003 (6 of 7)
Comments: 24hr Rush - HVOC Only! Results to: Gregg Lainio.

Sample Number: 9810667
Survey Number: 6072899
Approved On: 24-Apr-1998
Entered On: 21-Apr-1998

<u>Parameter</u>	<u>Results</u>	<u>Units</u>
Trichloroethane, 1,1,1- (Class I ODS)	450	mg/Kg
Trichloroethane, 1,1,2-	<1.0	mg/Kg
Carbon Tetrachloride (Class I ODS) (D019)	<1.0	mg/Kg
Trichlorofluoromethane (CFC-11, MF)	58	mg/Kg
Trichlorotrifluoroethane (CFC-113, TF)	1200	mg/Kg Diluted 100x
Dichlorobenzene, meta-	<1.0	mg/Kg
Methylene Chloride	15000	mg/Kg Diluted 100x
Dichlorobenzene, ortho-	<1.0	mg/Kg
Dichlorobenzene, para- (D027)	<1.0	mg/Kg
Perchloroethylene (D039)	6.9	mg/Kg
Trichlorobenzene, 1,2,4-	<1.0	mg/Kg
Trichlorobenzene, 1,2,3-	<1.0	mg/Kg
Trichlorobenzenes	<1.0	mg/Kg
Trichloroethylene (D040)	<1.0	mg/Kg

Crosscharge	50	\$
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24-Apr-1998



Technical Services Report

Customer: Cannon Air Force Base
Branch/Submitter: 600901
Sample Type: Technical Services
Line of Business: 28
General Description: Used Oil PCB8-003 (5 of 7)
Comments: 24hr Rush - HVOC Only! Results to: Gregg Lainio.

Sample Number: 9810666
Survey Number: 6072898
Approved On: 22-Apr-1998
Entered On: 21-Apr-1998

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<u>Parameter</u>	<u>Results</u>	<u>Units</u>
Trichloroethane, 1,1,1- (Class I ODS)	<1.0	mg/Kg
Trichloroethane, 1,1,2-	<1.0	mg/Kg
Carbon Tetrachloride (Class I ODS) (D019)	<1.0	mg/Kg
Trichlorofluoromethane (CFC-11, MF)	<1.0	mg/Kg
Trichlorotrifluoroethane (CFC-113, TF)	<1.0	mg/Kg
Dichlorobenzene, meta-	<1.0	mg/Kg
Methylene Chloride	<1.0	mg/Kg
Dichlorobenzene, ortho-	<1.0	mg/Kg
Dichlorobenzene, para- (D027)	<1.0	mg/Kg
Perchloroethylene (D039)	400	mg/Kg
Trichlorobenzene, 1,2,4-	<1.0	mg/Kg
Trichlorobenzene, 1,2,3-	<1.0	mg/Kg
Trichlorobenzenes	<1.0	mg/Kg
Trichloroethylene (D040)	<1.0	mg/Kg
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Crosscharge	50	\$
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Aroclor 1016	<1.0	mg/Kg
Aroclor 1221	<1.0	mg/Kg
Aroclor 1232	<1.0	mg/Kg
Aroclor 1242	<1.0	mg/Kg
Aroclor 1248	<1.0	mg/Kg
Aroclor 1254	<1.0	mg/Kg
Aroclor 1260	<1.0	mg/Kg
Aroclor 1262	<1.0	mg/Kg
Aroclor 1268	<1.0	mg/Kg
DCB	Y	%
Total PCB's	<1.0	mg/Kg

24-Apr-1998



Technical Services Report

Customer: Cannon Air Force Base
Branch/Submitter: 600901
Sample Type: Technical Services
Line of Business: 28
General Description: Used Oil PCB8-003 (1 of 7)
Comments: 24hr Rush - HVOC Only! Results to: Gregg Lainio.

Sample Number: 9810510
Survey Number: 6072898
Approved On: 21-Apr-1998
Entered On: 20-Apr-1998

Auto Skills

<u>Parameter</u>	<u>Results</u>	<u>Units</u>
Trichloroethane, 1,1,1- (Class I ODS)	<1.0	mg/Kg
Trichloroethane, 1,1,2-	<1.0	mg/Kg
Carbon Tetrachloride (Class I ODS) (D019)	<1.0	mg/Kg
Trichlorofluoromethane (CFC-11, MF)	85	mg/Kg
Trichlorotrifluoroethane (CFC-113, TF)	<1.0	mg/Kg
Dichlorobenzene, meta-	<1.0	mg/Kg
Methylene Chloride	<1.0	mg/Kg
Dichlorobenzene, ortho-	<1.0	mg/Kg
Dichlorobenzene, para- (D027)	<1.0	mg/Kg
Perchloroethylene (D039)	220	mg/Kg
Trichlorobenzene, 1,2,4-	<1.0	mg/Kg
Trichlorobenzene, 1,2,3-	<1.0	mg/Kg
Trichlorobenzenes	<1.0	mg/Kg
Trichloroethylene (D040)	3.0	mg/Kg
Crosscharge	50	\$

24-Apr-1998



Technical Services Report

Customer: Cannon Air Force Base
Branch/Submitter: 600901
Sample Type: Technical Services
Line of Business: 28
General Description: Used Oil PCB8-003 (4 of 7)
Comments: 24hr Rush - HVOC Only! Results to: Gregg Lainio.

Sample Number: 9810512
Survey Number: 6072897
Approved On: 21-Apr-1998
Entered On: 20-Apr-1998

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<u>Parameter</u>	<u>Results</u>	<u>Units</u>
Trichloroethane, 1,1,1- (Class I ODS)	7.8	mg/Kg
Trichloroethane, 1,1,2-	<1.0	mg/Kg
Carbon Tetrachloride (Class I ODS) (D019)	<1.0	mg/Kg
Trichlorofluoromethane (CFC-11, MF)	<1.0	mg/Kg
Trichlorotrifluoroethane (CFC-113, TF)	<1.0	mg/Kg
Dichlorobenzene, meta-	<1.0	mg/Kg
Methylene Chloride	<1.0	mg/Kg
Dichlorobenzene, ortho-	<1.0	mg/Kg
Dichlorobenzene, para- (D027)	<1.0	mg/Kg
Perchloroethylene (D039)	<1.0	mg/Kg
Trichlorobenzene, 1,2,4-	<1.0	mg/Kg
Trichlorobenzene, 1,2,3-	<1.0	mg/Kg
Trichlorobenzenes	<1.0	mg/Kg
Trichloroethylene (D040)	<1.0	mg/Kg
Crosscharge	50	\$

24-Apr-1998



Technical Services Report

Customer: Cannon Air Force Base
Branch/Submitter: 600901
Sample Type: Technical Services
Line of Business: 28
General Description: Used Oil PCB8-003 (2 of 7)
Comments: 24hr Rush - HVOC Only! Results to: Gregg Lainio.

Sample Number: 9810509
Survey Number: 6072895
Approved On: 21-Apr-1998
Entered On: 20-Apr-1998

524th

<u>Parameter</u>	<u>Results</u>	<u>Units</u>
Trichloroethane, 1,1,1- (Class I ODS)	<1.0	mg/Kg
Trichloroethane, 1,1,2-	<1.0	mg/Kg
Carbon Tetrachloride (Class I ODS) (D019)	<1.0	mg/Kg
Trichlorofluoromethane (CFC-11, MF)	<1.0	mg/Kg
Trichlorotrifluoroethane (CFC-113, TF)	<1.0	mg/Kg
Dichlorobenzene, meta-	<1.0	mg/Kg
Methylene Chloride	<1.0	mg/Kg
Dichlorobenzene, ortho-	<1.0	mg/Kg
Dichlorobenzene, para- (D027)	<1.0	mg/Kg
Perchloroethylene (D039)	<1.0	mg/Kg
Trichlorobenzene, 1,2,4-	<1.0	mg/Kg
Trichlorobenzene, 1,2,3-	<1.0	mg/Kg
Trichlorobenzenes	<1.0	mg/Kg
Trichloroethylene (D040)	<1.0	mg/Kg
Crosscharge	50	\$

24-Apr-1998



Technical Services Report

Customer: Cannon Air Force Base
Branch/Submitter: 600901
Sample Type: Technical Services
Line of Business: 28
General Description: Used Oil PCB8-003 (3 of 7)
Comments: 24hr Rush - HVOC Only! Results to: Gregg Lainio.

Sample Number: 9810511
Survey Number: 6072894
Approved On: 21-Apr-1998
Entered On: 20-Apr-1998

OSS/Phase

<u>Parameter</u>	<u>Results</u>	<u>Units</u>
Trichloroethane, 1,1,1- (Class I ODS)	<1.0	mg/Kg
Trichloroethane, 1,1,2-	<1.0	mg/Kg
Carbon Tetrachloride (Class I ODS) (D019)	<1.0	mg/Kg
Trichlorofluoromethane (CFC-11, MF)	<1.0	mg/Kg
Trichlorotrifluoroethane (CFC-113, TF)	<1.0	mg/Kg
Dichlorobenzene, meta-	<1.0	mg/Kg
Methylene Chloride	<1.0	mg/Kg
Dichlorobenzene, ortho-	<1.0	mg/Kg
Dichlorobenzene, para- (D027)	<1.0	mg/Kg
Perchloroethylene (D039)	<1.0	mg/Kg
Trichlorobenzene, 1,2,4-	<1.0	mg/Kg
Trichlorobenzene, 1,2,3-	<1.0	mg/Kg
Trichlorobenzenes	<1.0	mg/Kg
Trichloroethylene (D040)	<1.0	mg/Kg
Crosscharge	50	\$

24-Apr-1998



Technical Services Report

Customer: Cannon Air Force Base
Branch/Submitter: 600901
Sample Type: Technical Services
Line of Business: 28
General Description: Used Oil PCB8-003 (7 of 7)
Comments: 24hr Rush - HVOC Only! Results to: Gregg Lainio.

Sample Number: 9810513
Survey Number: 6072896
Approved On: 21-Apr-1998
Entered On: 20-Apr-1998

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<u>Parameter</u>	<u>Results</u>	<u>Units</u>
Trichloroethane, 1,1,1- (Class I ODS)	<1.0	mg/Kg
Trichloroethane, 1,1,2-	<1.0	mg/Kg
Carbon Tetrachloride (Class I ODS) (D019)	<1.0	mg/Kg
Trichlorofluoromethane (CFC-11, MF)	<1.0	mg/Kg
Trichlorotrifluoroethane (CFC-113, TF)	<1.0	mg/Kg
Dichlorobenzene, meta-	<1.0	mg/Kg
Methylene Chloride	<1.0	mg/Kg
Dichlorobenzene, ortho-	<1.0	mg/Kg
Dichlorobenzene, para- (D027)	<1.0	mg/Kg
Perchloroethylene (D039)	<1.0	mg/Kg
Trichlorobenzene, 1,2,4-	<1.0	mg/Kg
Trichlorobenzene, 1,2,3-	<1.0	mg/Kg
Trichlorobenzenes	<1.0	mg/Kg
Trichloroethylene (D040)	<1.0	mg/Kg
Crosscharge	50	\$



4/14/98

Technical Services Report

RETAIN SAMPLE TAKEN AT BX SERVICE
STATION AT TIME OF USED OIL PICK UP

Customer: SK Lubbock
Branch/Submitter: 600901
Sample Type: Technical Services
Line of Business: 00
General Description: PCB 8-003 Cannon AFB #1135
Comments: 24 HOUR RUSH/HVOC ONLY/Results to G Lainio, T Jordan, L Schleman

Sample Number: 9809551
Survey Number: 6072870
Entered On: 4/13/98
Approved On: 4/14/98
Approved By: JARDAN

<u>Parameter</u>	<u>Result</u>	<u>Units</u>	<u>Date Analyzed</u>
Crosscharge	46	\$	4/14/98
Phase Description	TOTAL		4/14/98
111	<1.0	mg/Kg	4/14/98
112	<1.0	mg/Kg	4/14/98
CCL4	<1.0	mg/Kg	4/14/98
FMF	<1.0	mg/Kg	4/14/98
FTF	<1.0	mg/Kg	4/14/98
MDCB	<1.0	mg/Kg	4/14/98
MECL	<1.0	mg/Kg	4/14/98
ODCB	<1.0	mg/Kg	4/14/98
PDCB	<1.0	mg/Kg	4/14/98
PERC	1700	mg/Kg	4/14/98
TCB1	<1.0	mg/Kg	4/14/98
TCB2	<1.0	mg/Kg	4/14/98
TCBS	<1.0	mg/Kg	4/14/98
TCE	<1.0	mg/Kg	4/14/98

End of Report



4/14/98

Technical Services Report

Customer:	SK Lubbock	Sample Number:	9809548
Branch/Submitter:	600901	Survey Number:	6072867
Sample Type:	Technical Services	Entered On:	4/13/98
Line of Business:	00	Approved On:	4/14/98
General Description:	PCB 8-003 Truck SK 5994 Front Tank	Approved By:	JARDAN
Comments:	24 HOUR RUSH/HVOC ONLY/Results to G Lainio, T Jordan, L Schlemann		

Parameter	Result	Units	Date Analyzed
Crosscheck:	46	S	4/14/98
Phase Description	TOTAL		4/14/98
111	270	mg/Kg	4/14/98
112	<1.0	mg/Kg	4/14/98
CCL4	<1.0	mg/Kg	4/14/98
FMF	13	mg/Kg	4/14/98
FTF	700	mg/Kg	4/14/98
MDCB	<1.0	mg/Kg	4/14/98
MECL	4700	mg/Kg	4/14/98
ODCB	<1.0	mg/Kg	4/14/98
PDCB	<1.0	mg/Kg	4/14/98
PERC	54	mg/Kg	4/14/98
TCB1	<1.0	mg/Kg	4/14/98
TCB2	<1.0	mg/Kg	4/14/98
TCB3	<1.0	mg/Kg	4/14/98
TCE	<1.0	mg/Kg	4/14/98

End of Report



4/14/98

Technical Services Report

Customer:	SK Lubbock	Sample Number:	9809549
Branch/Submitter:	600901	Survey Number:	6072868
Sample Type:	Technical Services	Entered On:	4/13/98
Line of Business:	00	Approved On:	4/14/98
General Description:	PCB 8-003 Truck SK 5994 Back Tank	Approved By:	JARDAN
Comments:	24 HOUR RUSH/HVOC ONLY/Results to G Lainio, T Jordan, L Schiemann		

Parameter	Result	Units	Date Analyzed
Crosscharge	46	\$	4/14/98
Phase Description	TOTAL		4/14/98
111	<1.0	mg/Kg	4/13/98
112	<1.0	mg/Kg	4/13/98
CCL4	<1.0	mg/Kg	4/13/98
FMF	<1.0	mg/Kg	4/13/98
FTF	<1.0	mg/Kg	4/13/98
MDCB	<1.0	mg/Kg	4/13/98
MBCL	7.6	mg/Kg	4/13/98
ODCB	<1.0	mg/Kg	4/13/98
PDCB	<1.0	mg/Kg	4/13/98
PERC	<1.0	mg/Kg	4/13/98
TCB1	<1.0	mg/Kg	4/13/98
TCB2	<1.0	mg/Kg	4/13/98
TCB5	<1.0	mg/Kg	4/13/98
TCE	<1.0	mg/Kg	4/13/98

End of Report