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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6  
10625 FALLSTONE RD.  
HOUSTON, TEXAS 77099

June 28, 2000

Danny Barnett, Chief  
Environmental Flight  
27 CE/CEV  
Cannon AFB, NM



RE: Multimedia Inspection Report

Dear Mr. Barnett

During the week of March 27, 2000, EPA and NMED performed a multimedia inspection at your facility. Enclosed are copies of the inspection reports from the participating EPA environmental programs: Clean Air Act, National Pollutant Discharge Elimination System, Resource Conservation and Recovery Act, and Toxic Substances Control Act.

These reports have been forwarded to our Regional Office (EPA Region 6) in Dallas, Texas. If you have any questions concerning these reports, please contact me at 281-983-2105, or call the individual inspector.

Sincerely,

Richard Gigger  
Houston Surveillance Team Leader  
U.S. Environmental Protection Agency

cc: New Mexico Environment Department

Enclosures



UNITED STATES ENVIRONMENTAL PROTECTION  
REGION 6  
1445 ROSS AVENUE, SUITE 1200  
DALLAS, TX 75202-2733

MEMORANDUM

April 26, 2000

SUBJECT: RCRA Compliance Inspection Report  
FROM: Michael Michaud, Chief  
Surveillance Section (6EN-AS)  
TO: Carol Peters, Chief  
ALONM Section (6EN-HS)

The attached RCRA inspection report has been prepared and reviewed by Surveillance Section personnel. This report is being forwarded to you for your information and action.

EPA ID Number: NM7572124454 Inspection Dates: March 28-29, 2000  
Facility Name: Cannon Air Force Base

Facility Mailing Address: 27 CE/CC  
506 N DL Ingram Blvd.  
Cannon AFB NM 88103-5136

Facility Owner: Department of the Air Force Phone: 505-784-1146  
Facility Description: Military Base  
Type of Ownership:  Federal  State  County  Municipal  Private  
Did facility request a copy of the report?  YES  NO

HW Activities:  Generator  Treatment  Storage <90-days  
 Storage  Disposal  Transporter  Groundwater

Inspection Type:  Lead  Overview  STARS Commitment  CEI  CDI  
 PCE  Land Ban  BIF  Sampling  Multi-Media  
 Maquiladora

Inspection Participants: (name and phone number)  
EPA Inspector(s): Roberto Bernier - 214-665-8376  
State Inspector(s): Glen Von Gonten - 505-827-1558 (Ext. 1024)  
Facility Representative(s): Vera A Wood - 505-784-1097

Attachments: See Narrative

Apparent violations noted during outbriefing: See Narrative

Prepared by: *Roberto Bernier* Date: 4/25/00

Reviewed by: *Ken Cochrane* Date: 4-26-00

## INTRODUCTION

On March 28-29, 2000, a RCRA-CEI inspection was conducted at the Cannon Air Force Base (Cannon) located in Clovis, New Mexico. The inspection was part of a Type-D Multimedia inspection conducted at the facility in which other EPA programs also participated. The purpose of this part of the multimedia inspection was to verify compliance with the RCRA regulations, which control the hazardous waste (HW) activities conducted at the facility. In addition, the facility was inspected following Executive Order 13101 to gather information in regards to compliance under Section 6002 of RCRA. This regulation covers the facility's ability to operate through waste prevention, recycling, and federal acquisition. Under RCRA, Cannon operates using EPA and HW Identification No. NM7572124454.

An entrance briefing with Cannon representatives was held upon arrival at the facility at 9:15 a.m. The agenda, scope and purpose of the inspection were discussed during the briefing. After a short introduction and safety briefing by Cannon, the environmental programs separated into different groups to start their individual inspections. The RCRA group started their inspection at 10:30 a.m. the following morning with an introductory briefing regarding the RCRA status of the facility. The participants were:

<u>Name</u>	<u>Representing</u>	<u>Phone No.</u>
Roberto L. Bernier	U.S. EPA - Surveillance	214-665-8376
Glen VonGonten	NMED - HRMB	505-827-1558
John S. Pike	Cannon - 27 <sup>th</sup> CE/CEVP (RCRA)	505-784-1092
Vera A. Wood	Cannon - 27 <sup>th</sup> CE/CEVP (RCRA)	505-784-1097

The inspector proposed an agenda for the inspection, which included a tour of the facility including the RCRA management areas, and a review of the facility RCRA records and reports.

## **I. FACILITY BACKGROUND:**

Cannon, is a U.S. Air Force Base located on US HWY. 60/84, about seven to eight miles west of Clovis, Curry County, New Mexico. Cannon is a fully active military installation basing the 27<sup>th</sup> Fighter Wing, which houses three squadrons of the F-16 fighter jet, and with one of the squadrons controlled and operated by the Singapore Air Force. In addition, they house several other groups and squadrons such as operations, Logistics, Maintenance, Support, and Medical to provide support to the 27<sup>th</sup> Fighter Wing mission. The facility started operations in the late 1920's as civilian air terminal under the name of Portair Field. In 1942 the DoD took over the airfield operations and renamed it Clovis Army Air Base until it was reassigned to the Tactical Air Command in 1951. A brief facility history is included in Attachment A.

The facility, with a personnel force of 4,200, houses around fifty industrial buildings on 3,782 acres of land. Cannon is bordered by open farmland in every direction, but is located close to the city of Clovis to the east, and the towns of Melrose and Portales to the west and south respectively. Under RCRA, Cannon operates as a large quantity generator (LQG) of HW with one permitted container storage area (CSA) at the DRMO area, one less than 90-day CSA, and about sixty satellite accumulation points (SAPs) or points of HW generation. Most of the SAPs are permanent units, but several are considered by Cannon as rotational or temporary.

## **II. HAZARDOUS WASTE STREAMS:**

Since Cannon does not perform or operate any major industrial or manufacturing processes, waste generation is limited to mostly characteristic HWs from mainly aircraft, weapons, and equipment maintenance activities. Some listed HWs such as spent solvents and paint related wastes are also generated on a smaller scale. Attachment D includes a list of the waste streams generated around the facility with the respective processes or point of generation. Attachment B includes the last biennial report submitted to NMED. Based on this report and from information obtained during the inspection, the largest HW stream comes from the maintenance of aircraft, vehicles, weapons, and equipment in the form of contaminated rags, absorbents, PPE, and other miscellaneous solids. Other significant waste streams include waste liquids and spent solutions contaminated with TCLP metals from the aircraft corrosion control, the fleet maintenance, and the parts degreasing operations. Also, the fueling and the painting/stripping operations generate a significant amount of HWs.

Cannon initially uses the SAPs around the facility to store the HWs generated at any of the more than sixty points of generation distributed around the base. At the time of the inspection, Cannon was operating more than thirty-five shops that were managing one or more SAPs. From the SAPs, the respective area managers notify the environmental department and the DRMO for transfer of the waste to either the less than 90-day CSA or the permitted CSA (DRMO) depending on capacity and/or regulatory limitations. Off-site shipment of HWs is done through the DRMO. Cannon mostly uses Disposal Systems, Inc. from Deer Park, TX as the designated disposal facility, but some waste is also sent to Eltex Chemical, Inc. from Houston, TX, Chemical Reclamation Services from Avalon, TX, and Salesco Systems out of Phoenix, AR.

### III. SITE TOUR:

The site tour consisted of visits to the permitted and less than 90-day CSAs, and several SAPs or points of HW generation. At the time of the inspection, the number of containers and/or gallons of HWs being stored at the permitted CSA located at the DRMO area was below the permitted capacity. One of the two smaller bays is used to store corrosive wastes and the other for oxidizer wastes. Both have a storage maximum permitted capacity of 350 gallons of HWs each. At the time of the inspection, in the corrosive bay Cannon had approximately 300 gallons of HWs in containers of 55-gallons or less. The oxidizer bay was empty. The larger bay, which is used to store flammable and combustible wastes, has a storage maximum permitted capacity of 1320 gallons or twenty-four 55 gallon containers. At the time of the inspection, there were eighteen 55-gallon HW containers stored in the flammable side of the bay. All the containers were closed, labeled, and none of them have been in storage for more than a year. Cannon's internal policy for the permitted CSA in regards to storage time is also a limit of 90-days.

The less than 90-day area appeared to be well operated and managed. The area is used to store HWs that are not allowed to be stored at the permitted CSA because of waste or capacity restrictions, or to store wastes that are awaiting analytical results (HW determination). All the containers were closed, labeled, and dated according to the RCRA requirements. Based on the lists included in Attachment C and D, the SAPs in the following buildings or areas were inspected:

<u>Shop Code No.</u>	<u>Building</u>	<u>Organization</u>
042	199	Corrosion Control
003	204	522 FS Operations
006	208	OSS, Inspections
057	219	Logistics, POL
040	186	EMS, AGE
029	197	CRS, Fuels
034	680	CRS, Propulsion
026	684	CRS, Electro Environ.
048	122	EMS, Wheel & Tire

All the containers were closed and labeled according to RCRA requirements. The inspector noted that the SAPs were under the complete control of the area manager. No areas of concern were noted during the inspection of the above SAPs or point of HW generation.

### IV. RECORDS REVIEW:

HW manifests and inspection logs generated between January of 1999 through the date of the inspection were reviewed. All the manifests and most of the RCRA-required documents are kept at the DRMO area. The inspector noted that on nine different instances on about a year period, Cannon failed to get a copy of the manifest with the signature of the initial transporter. In specific, the signature that is required on the manifest's continuation sheet(s) (EPA Form 8700-22A). Those

manifests include C9001 (1/11/99), C9004 (1/11/99), C9009 (2/17/99), C9014 (2/17/99), C9022 (5/12/99), C9025 (7/15/99), C0002 (1/13/00), C0005 (2/17/00), and C0006 (2/17/00). Copies of the manifests can be found in Attachment E. Other RCRA required records and documents that were reviewed include the CSAs inspection logs, the contingency plan, training program and records, exception reports, LDR certifications, etc. The rest of the reviewed records and reports appeared to be in compliance.

#### **V. INSPECTION FINDINGS AND/OR AREAS OF CONCERN:**

1) 40 CFR §262.23 - Use of the Manifest

Cannon did not obtain the handwritten signature of the initial transporter and date of acceptance on the manifest continuation sheets (EPA Form 8700-22A) on nine different shipments that occurred between January 1999 and February 2000. Those manifests include C9001 (1/11/99), C9004 (1/11/99), C9009 (2/17/99), C9014 (2/17/99), C9022 (5/12/99), C9025 (7/15/99), C0002 (1/13/00), C0005 (2/17/00), and C0006 (2/17/00).

## **INDEX FOR ATTACHMENTS**

(Cannon AFB - NM7572124454)

- Attachment A - Facility History
- Attachment B - 1999 Biennial Report
- Attachment C - Organization Inventory by Point of HW Generation
- Attachment D - HW Stream Inventory by Point of HW Generation
- Attachment E - Manifests without Transporter Signature