



GARY E. JOHNSON
GOVERNOR

State of New Mexico
ENVIRONMENT DEPARTMENT
Hazardous & Radioactive Materials Bureau
2044 Galisteo
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MARK E. WEIDLER
SECRETARY

EDGAR T. THORNTON, III
DEPUTY SECRETARY

January 24, 1996

Howard E. Moffitt
Deputy Base Civil Engineer
49 CES/CEV
550 Tabosa Ave.
Holloman Air Force Base, NM 88330

Dear Mr. Moffitt:

RE: Application of Sealing Rings

The Hazardous and Radioactive Materials Bureau (HRMB) is in receipt of your January 3, 1996 letter detailing Holloman AFB's procedures for closing open head drums used to accumulate volatile low hazard class 9 solid waste at Holloman Air Force Base. Based on the information provided in your letter, HRMB believes that this activity can be conducted in compliance with the New Mexico Hazardous Waste Management Regulations (20 NMAC 4.1) provided that no free liquids are being stored in containers that are not sealed. A container with a lid covering the top of the container is not required to have a sealing ring if only solid hazardous waste is in the container.

Thank you for contacting us concerning this matter. If you have any questions, please call me at (505) 827-1558.

Sincerely,

A handwritten signature in cursive script, appearing to read "Coby Muckelroy".

Coby Muckelroy
RCRA Inspection/Enforcement Program Manager
Hazardous and Radioactive Materials Bureau



DEPARTMENT OF THE AIR FORCE

HEADQUARTERS 49TH FIGHTER WING (ACC)
HOLLOMAN AIR FORCE BASE, NEW MEXICO



3 JAN 1996

MEMORANDUM FOR NEW MEXICO ENVIRONMENT DEPARTMENT
Hazardous and Radioactive Materials Bureau
ATTN: Mr. Coby Muckelroy
2044 Galisteo
P.O. Box 26110
Sante Fe NM 87502

FROM: 49 CES/CC
550 Tabosa Ave
Holloman AFB NM 88330-8458

SUBJECT: Notification of Application of Sealing Rings at
Holloman AFB

1. This is notification that sealing rings will not be attached to open head drums used to initially accumulate volatile low hazard class 9 solid waste at Holloman AFB (HAFB). As discussed on 30 October 1995, between our Mr. Billy Claxton and yourself, non-application of the sealing ring to in-use initial accumulation drums used for accumulation of volatile low hazard class 9 solid waste would be an acceptable practice pending further review by NMED of circumstances justifying this practice.
2. The volatile low hazard class 9 solid wastes typically generated at HAFB include cloth towels, floor sweepings, absorbents, coveralls and miscellaneous debris. They are typically characterized as hazardous waste due to the presence of benzene, methyl ethyl ketone, toluene and 1,1,1-trichloroethane. During the previous two years (1993 and 1994), NMED allowed HAFB to maintain sealing rings free in-use hazardous waste initial accumulation point open-head drums for volatile low hazard class 9 solid hazardous waste. On 24 October 1995, HAFB was informed by NMED that the sealing ring should be applied to in-use hazardous waste initial accumulation point open-head drums for volatile solid hazardous waste.
3. In an effort to comply with NMED's new sealing ring policy, instruction had been given to HAFB personnel to attach the sealing ring. When a drum that had been sealed for several hours was opened, the vapor pressure contained within the drum caused

the lid and sealing ring to fly off. The drum lid struck the 8 foot high ceiling and the sealing ring struck an individual.

4. As indicated previously, for the past two years, sealing rings have not been required to be attached to in-use hazardous waste initial accumulation point open-head drums. NMED required that the drum be in a secure area under the control of personnel authorized to use the drum, with the drum lid completely placed upon the drum less the sealing ring. For two years, 1993 and 1994, without incident, this was and should remain the allowable method for in-use hazardous waste initial accumulation of volatile low hazard class 9 solid hazardous waste.

5. We would appreciate your concurrence or comments on the aforementioned use of sealing rings. If you have any questions or need additional information regarding this request, contact Mr. Billy Claxton at 475-3931.


HOWARD E. MOFFITT
Deputy Base Civil Engineer

1st Ind, NMED

TO: 49 CES/CEV

Concur/Non-concur on sealing ring use on volatile low hazard class 9 solid waste at Holloman AFB's initial accumulation points.

(signature, date)

(print name)