



DEPARTMENT OF THE AIR FORCE
HEADQUARTERS 49TH WING (ACC)
HOLLOMAN AIR FORCE BASE, NEW MEXICO

ENTRUSTED

A. David Budak
Deputy Base Civil Engineer
550 Tabosa Avenue
Holloman AFB NM 88330-8458

New Mexico Environment Department
Hazardous Waste Bureau
Attn: Mr. John Kieling
2905 Rodeo Park Drive East, Bldg 1
Santa Fe NM 87505

NOV 20 2011



Dear Mr. Kieling

As facility owner of the permitted Treatment, Storage and Disposal Facility, Holloman AFB certifies, as required in 40 CFR 264.73(b)(9), that a program to reduce the volume and toxicity of hazardous waste is in place. This letter and attachments serve to satisfy the year-end requirement according to Section II.D., Waste Minimization of the Resource Conservation and Recovery Act Hazardous Waste Facility Operating Permit, EPA ID No. NM6572124422.

Attached is the Fiscal Year 2011 Holloman AFB Waste Minimization Program for the period of 1 Oct 10 through 30 Sep 11. This waste minimization program includes the 49th Asset Management Environmental Guidance Memorandum and a matrix of waste streams produced by Holloman AFB operations.

If you have any questions, please contact Ms. Geraldine Arellano of our Asset Management Flight at (575) 572-3931.

Sincerely


28 NOV 20 11
A. DAVID BUDAK, GS-14, DAFC

Attachment:
Fiscal Year 2011 Holloman AFB Waste Minimization Program

Fiscal Year 2011 Holloman AFB Waste Minimization Program

Waste Minimization Plan Objective

Any written policy or statement that outlines the goals, objectives, and/or methods for source reduction and recycling of hazardous waste at the facility.

Any employee training or incentive program designed to identify and implement source reduction and recycling opportunities for all hazardous/mixed waste.

Any source reduction and/or recycling measures implemented in the last five years or planned for the near future.

Holloman AFB Fiscal Year 2011 Actions

A written Asset Management Environmental Guidance Memorandum that includes the entire base signed by the Base Civil Engineer. Copy attached.

Employee training or incentive programs include participation in:

- Annual Air Force Environmental Training Symposium
- Quarterly Internal Environmental Compliance Assessment Management Program
- Ongoing Pollution Prevention Opportunity Assessments
- Monthly Hazardous Waste Management Training

Source reduction measures include:

- Aqueous parts washers
- Introduction of environmentally friendly cleaning compound (EP-921) to replace solvent used in paint gun cleaners
- Recovery of silver from waste generated by maintenance operations on the new F-22 aircraft

Planned source reduction/recycling measures include:

- Use of premoistened solvent wipes to reduce solvent use for cleaning where solvent use is required to meet Technical Order requirements for aircraft maintenance

An itemized list of dollar amounts of capital expenditures (plant and equipment) and operating costs devoted to source reduction and recycling of hazardous waste.

- Through the end of FY2011, 12,983 pounds of hazardous waste were recycled through SafetyKleen at an operating cost of over \$53,000.

Factors that have prevented implementation of source reduction and/or recycling.

Recycling markets for hazardous waste are dependent on types of waste, quantity and distance to nearest recycling facility.

Sources of information on source reduction and/or recycling received at the facility (e.g. local government, trade associations, suppliers, etc.)

Course attendance, online searches and networking with others at the Air Force Environmental Training Symposium, other Air Force Bases, commercial entities through association with the New Mexico Recycling Coalition and Environmental Protection Agency.

An investigation of additional waste minimization efforts that could be implemented at the facility. This investigation shall analyze the potential for reducing the quantity and toxicity of each waste stream through production process change, production reformulation, recycling, and all other appropriate means. The analysis shall include an assessment of the technical feasibility, cost, and potential waste reduction for each option.

Investigation of waste minimization:

- Opportunity Assessments are continued to evaluate waste minimization opportunities

A flow chart or matrix detailing all hazardous wastes it produces, by quantity and type, including mixed waste, and by building/area and program if consistent with security considerations.

Demonstration of the need to use those processes which produce a particular hazardous waste due to a lack of alternative processes, available technology, or available alternative processes that would produce less volume of toxic waste.

Demonstration of the applicability or inapplicability of the following waste minimization techniques:

- A program that inventories the amount of contaminated lead that exists at the facility
- A program that substitutes steel for lead whenever possible
- A program for coating lead with a strippable coating to prevent its entire contamination, if it is impossible to substitute steel for lead
- A program or bench scale method to decontaminate the contaminated lead
- Use of non-hazardous liquid scintillation cocktail solution
- A program designed to prevent commingling of radioactive waste

Matrix attached. Routine operations at Holloman AFB do not produce mixed waste streams.

The requirements to use processes which produce a particular hazardous waste are driven by our mission (Air Defense of the USA) including operations and maintenance of complex aircraft.

Not Applicable – Operations at HAFB do not produce radioactive contaminated lead

Not Applicable – Routine operations at HAFB do not produce radioactive contaminated lead

Not Applicable – Operations at HAFB do not produce radioactive contaminated lead

Not Applicable – Operations at HAFB do not produce radioactive contaminated lead

Not Applicable – Scintillation cocktail solution is not used at HAFB.

Not Applicable – Routine operations at HAFB does not produce radioactive waste