

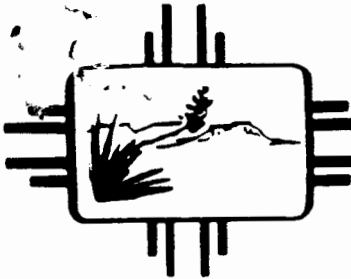
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New Mexico Health and Environment Department



GARREY CARRUTHERS
Governor

DENNIS BOYD
Secretary

MICHAEL J. BURKHART
Deputy Secretary

RICHARD MITZELFELT
Director

MEMORANDUM

DATE: July 13, 1990

TO: Richard Mitzelfelt
Director
Environmental Improvement Division

THROUGH: Jack Ellvinger
Chief
Hazardous Waste Bureau

FROM: A. Elizabeth Gordon *AG*
Permitting Supervisor
Hazardous Waste Program

RE: Operating Permit for Kirtland Air Force Base (KAFB)

Hazardous Waste Units and Wastes Managed at KAFB

KAFB is seeking a permit to handle hazardous waste in containers in three storage buildings. Buildings 28009 and 615 are concrete bunkers originally designed for munitions storage and are the buildings KAFB is currently using to store hazardous wastes. Building 1024 is new, presently not being used and will become the primary storage facility if the permit is issued. KAFB accepts wastes generated by maintenance activities and weapons research at the base, as well as from other military activities located off-base. KAFB proposes to store virtually all RCRA hazardous wastes, but the most common ones are spent cleaning solvents and waste paints. Wastes are stored in containers which meet or exceed Department of Transportation (DOT) requirements and are physically separated according to compatibility. These wastes are stored and prepared for shipment and final disposal at out-of-state hazardous waste disposal facilities. The design features of the building include separate storage of incompatible wastes, two-hour rated fire doors and walls, an automatic sprinkler system and secondary containment for all wastes. All the buildings are managed by the Defense Reutilization and Marketing Office (DRMO), a tenant of KAFB.

Changes to the Draft Permit

The most significant and frequently raised concerns regarding issuing a permit to KAFB were the transport of wastes through

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Albuquerque and the proximity of the new building to the Veterans Administration Medical Center, Lovelace Medical Center and a retirement home. A suggested alternate route was the road out the south gate to Los Pichachos Road. This route was travelled by Mr. Nick Van Kleeck and found to be unsuitable for the following reasons: it is narrow, heavily travelled during rush hours, further removed from emergency response teams, without a true shoulder in many areas and requires the trucks to enter the freeway by travelling through the Mountainview neighborhood. For these reasons, the suggested route was not incorporated into the permit; additionally, we have limited authority to address transportation issues. Two modifications were made to the draft permit to address the concerns regarding the location of the new facility. KAFB is required to notify immediately by phone the Albuquerque Fire Department and all hospitals, retirement and convalescent facilities within one-quarter mile of the building of any massive release or fire and a list of the facilities to be contacted shall be kept with the contingency plan as part of the operating record. Also, the Base is to cooperate with the Local Emergency Planning Committee provided for by Title III of the Superfund Amendment and Reauthorization Act in developing an Emergency Response Plan within one year of the effective date of the permit and this Plan will become part of the operating record.

Recommended Action

The Hazardous Waste Program recommends that the permit be issued because the standards for permitted facilities are strict, the design features of the building are excellent and modifications have been made to address the concerns of the citizens. Requiring notification of the medical facilities within one-quarter mile and cooperation with the Local Emergency Planning Committee are omnibus. The permit has been reviewed by the Office of General Counsel.