



DEPARTMENT OF THE AIR FORCE

ENTERED

HEADQUARTERS 1606TH AIR BASE WING (MAC)
KIRTLAND AIR FORCE BASE, NEW MEXICO 87117-5000

31 JAN 1991

Ms Pat Riggenberg
New Mexico Environmental Improvement Division
Hazardous and Radioactive Waste Bureau
4131 Montgomery Boulevard, NE
Albuquerque NM 87109

Dear Ms Riggenberg

You conducted a Resource Conservation and Recovery Act (RCRA) inspection at Kirtland Air Force Base (KAFB) from 25-27 Sep 90, which resulted in the New Mexico Environmental Improvement Division (NMEID) finding five (5) minor violations. They are listed below with corrective actions that have been taken.

Violations, corrective actions, and/or responses:

1. Waste exceeded 55 gallons at the Chemical Laser Facility Satellite Accumulation Point (SAP) outside Building 617. This is a violation of HWMR-5, Part III, 40 CFR section 262.34(c)(2).

- Corrective Action: The excess hazardous waste with a complete analysis was removed to a hazardous waste storage unit in early October; the other suspected waste is awaiting further laboratory results. The waste in excess was waiting for sample results to be returned from the laboratory to determine the chemical and physical characteristics; this was a one-time generation. The other waste was generated from batch processing and under the control of the SAP monitor.

During the time of the RCRA inspection the Chemical Laser Facility SAP was being remodeled. The remodeling consisted of building a new berm area to expand the hazardous material and the hazardous waste storage. This entailed concrete pads, concrete berm, steel grating, emergency shower and proper labeling. This remodeling will allow the SAP to be subdivided to accommodate more than one hazardous waste (in quantities not to exceed 55 gallons) as discussed in the inspection outbrief. With all the construction work being done at the SAP it gave the appearance that the area was disorganized. After further investigation, the inspection revealed that all the SAP drums were under lock and key and that all the drums awaiting analytical results were marked.

2. A container holding hazardous waste must always be closed except when adding or removing waste. There was an open funnel on the drum in the SAP at Building 482. This is a violation of Pt VI, 40 CFR section 265.173(a).

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- Corrective Action: The funnel was removed on 25 Sep 90 and a new funnel with a flip-up lid that locked was installed on the drum on 27 Sep 90. The SAP is a metal structure, with fire resistant walls and fire resistant roof, corrosion resistant grating, corrosion resistance catch basin, vapor vented area, fire rated door with lock. The building is considered to be the state of the art for hazardous waste storage. The drum in question was in the above described building under lock and closely monitored.

3. A closure schedule was not included in the closure plans for the battery shop and golf course pond. This is a violation of Pt VI, 40 CFR section 265.112(a)(6).

- Response: Page 26 of the battery shop closure plan lists 1989 as the expected year of closure and states that closure will be completed within 180 days of NMEID approval of the plan. We will provide more detailed information upon completion of NMEID's review of the entire closure plan document submitted on 17 May 89, and try to correct any deficiencies noted. The closure plan for the golf course pond reviewed by the inspector was a draft copy that was not due for final submittal until 30 Nov 90. The final document submitted includes a closure schedule.

4. The expected year of closure was not given in the closure plans for the storage buildings, golf course pond and sewage lagoons. This is a violation of Pt VI, 40 CFR section 265.112(a)(6).

- Response: Page M-6 of the Part B permit application section on closure lists 2034 as the expected year of closure for Bldg 1024, one of our hazardous waste storage units. As with the golf course pond closure plan, the sewage lagoon plan reviewed during the inspection was also a draft. The final version of this plan was also submitted on 30 Nov 90. Both plans list the closure year as 180 days following the day of NMEID's approval of the plans.

- The closure plans referenced in Items 3 and 4, as applicable to the golf course pond and sewage lagoons, are being resolved by the 28 Feb 90 Compliance Agreement signed by NMEID and KAFB. Given the 30 Nov 90 revised deadline for submission, it is premature and inappropriate to include this as an NOV by a separate mechanism. Per paragraph B.3 of the Agreement, KAFB is deemed in compliance upon submission of the closure plan and subject to 40 CFR 265, Subpart G at that time. Therefore, KAFB was not subject to inspection of these plans until 30 Nov 90. The plans have been revised since then to include additional items required by NMEID. Also the expected year of closure given, 2034, is only an estimate for Bldg 1024. Because Bldg 1024 is state of the art and just built, there are no present plans to close it at all, much less the 20-year timeframe referenced in the CFRs. The other two buildings may or may not

be used after Bldg 1024 is operational. As referenced by the fourth NOV discrepancy, 40 CFR 265.112(a)(7) applies to final closure for facilities that use trust funds to demonstrate financial responsibility and whose remaining operating life is less than 20 years. This does not apply to KAFB.

5. Not all of the emergency equipment/supplies were in place at the hazardous waste storage building, as required by KAFB's hazardous waste storage permit. This is a violation of Appendix G-2 of the permit.

- Corrective Action: During the inspection of the weekly check lists (Bldg. 28003) it was noted that one pair of safety glasses was missing (12 Jan 90) and no correction of the weekly check lists documented that the safety glasses were replaced. Actually, the safety glasses were at Building 28003 during the inspection but were not checked off the list. The weekly check list of 9 Oct 90 documents that the safety glasses were replaced.

KAFB has three (3) hazardous waste storage units (buildings). There are two (2) units that are being used, Building 613 and Building 28003. The other, Building 1024, is new and will not be put into use until all the permit issues with the NMEID are resolved.

During the inspection of Building 1024 the inspector was informed that all the equipment was not in place because this hazardous waste storage unit was not being used. When the unit is placed into use all of the equipment/supplies will be in their respective places.

If you have any questions, please feel free to contact Walter S. Darr at (505) 846-2774.

Sincerely



EDWARD S. BRANNUM, Colonel, USAF
Commander

cc: Ms K. Sisneros
Ms T. Hughes
HQ MAC/LEEV