



State of New Mexico  
**ENVIRONMENT DEPARTMENT**  
Harold Runnels Building  
1190 St. Francis Drive, P.O. Box 26110  
Santa Fe, New Mexico 87502  
(505) 827-2850

JUDITH M. ESPINOSA  
SECRETARY

BRUCE KING  
GOVERNOR

RON CURRY  
DEPUTY SECRETARY

July 11, 1994

Walter S. Darr, Director  
Environmental Management Division  
377 Air Wing  
Kirtland Air Force Base  
2000 Wyoming Blvd. N.E.  
Albuquerque, NM. 87117

Dear Mr. Darr:

On June 14, 1994, the New Mexico Environment Department (NMED) conducted a Compliance Evaluation Inspection (C.E.I.) of Security Environmental Systems, Inc. (SES) in Artesia, NM. SES is currently operating as a hazardous waste transfer facility. During the C.E.I., the inspectors noted some RCRA and non-RCRA waste picked up from KAFB on May 27, 1994. In particular, a waste stream labeled Non-Hazardous Waste containing "non-RCRA waste liquid (spent photographic chemicals, fixers and replenishers)", was in question. The container was also marked pH=4.3. The inspectors checked the pH of the contents with pHydriion paper (controls 0.0-3.0). What the inspectors discovered was that the pH, even when diluted 50:50 with water, came out to pH=1.5. This indicates that this is a corrosive (D002) waste. However, the use of pH paper is not an approved EPA test method and does not constitute accurate scientific method.

Enclosed are two photographs of the container showing the labeling and the results of the inspectors pH measurement. The NMED urges you to address your staff about the prudence in labeling waste streams so that this kind situation is prevented in the future.

If you have any questions, please contact Mr. Frank Sanchez or myself at (505) 827-4308 or at our address. Thank you in advance for your cooperation.

Sincerely,

Coby Muckelroy  
RCRA Inspection/Enforcement Program Manager

