



ENTERED

20 July 1994

377 ABW/EM
2000 Wyoming Blvd SE
Albuquerque, NM 87117-5659

Mr Coby Muckelroy
RCRA Inspection/Enforcement Program Manager
New Mexico Environment Department
Harold Runnels Building
1190 St. Francis Drive
P. O. Box 26110
Santa Fe NM 87502

RE: Compliance Evaluation Inspection (Your Letter dated 11 July 1994)

Dear Mr Muckelroy

Attached is a copy of the sample taken on the spent photographic chemicals, fixers and replenishers container in Security Environmental Systems (SES) Artesia NM facility. This sample was taken December 23, 1994 and the item was shipped based on sample results (see attachment 1).

After consultation with our analytical lab, it was noted that items with a PH are not diluted with water. Dilution with water changes the PH and is not a valid sampling for the item. Kirtland AFB shipped this item based on our sampling data, placed EPA number and labeled accordingly. The PH was 4.3 which is not RCRA and therefore, Nonregulated.

If you have any questions, please contact Ms Marsha Carra at (505) 846-5027. Thank you for your interest and diligence in working with Kirtland Air Force Base. We appreciate your help and cooperation.

Sincerely,

Walter S. Darr III
WALTER S. DARR III
Chief, Compliance
Environmental Management
Division

Attachment
Sample # K30-9051A



KIRTLAND AFB WASTE SAMPLING Task Request/Analysis Report Form

Location Information:

General Base Location: EAST
 Building #: 9051
 Sample taken at: 9051 Bldg.
 Item stored at: Room EAST of
Photo Lab - 5 G.M. P. Drum
 Radiation Check: Yes No
 (If Yes, See Attached)
 Action Req'd: SAMPLE
 Contact Name: SCOTT CARTER
 Phone Number: 846-4252
 Organization: BOP SITE
 Shop Activity: Explosives

" A "

SAMPLE ID #: K30-9051
 Description: WASTE Labeled (Acid)
 Waste Stream #: _____
 Chain-of-Custody: _____
 W.A.F. #: _____
 Laboratory: _____
 Date requested: 1 1
 Sample date: 12/23/93
 Report date: 1 1

Material description: Yellowish - Liquid
 State: _____
 Quantity: _____ Units: _____

Container Description:

Type: PLASTIC
 Size: 5 Gm.
 Mat'l: YELLOWISH - LIQUID
 Color: Clear (TRANSPARENT)
 Condition: Good
 # Items this sample: 5
 Total Volume: Full

Layering:

____ Multi-phase ____ Bi-layered ____ Layers
 Multi-phase
 Field pH _____ Field Flash _____
 Color: _____
 Odor: _____
 Contents: _____
 Description: _____

Label Information:

DOT #	_____	_____
EPA #	_____ kg	_____ lbs
HE CLASS	_____ kg	_____ lbs
WT	_____ kg	_____ lbs
CONTAINER	_____ kg	_____ lbs
MAT'L VOL	_____	_____

Disposal Criteria (if known):

Weight:

DENSITY _____
 SG _____
 HE CLASS _____
 WT/VOL _____

History/Processes at sites:

Assaigai Analytical Labs
7300 Jefferson NE
Albuquerque, NM 87109

Attn: MARLEAH M. MARTIN
Phone: (505)345-8964

PHILLIPS LABORATORY/EMD
3651 LOWERY AVE. SE
ALBUQUERQUE, NM 87117-5777

Attn: MARSHA CARRA/WALTER DARR

Purchase Order: F29650-93-D0008-5000
Invoice Number:

Order #: 93-12-203
Date: 01/07/94 12:20
Work ID: K30
Date Received: 12/23/93
Date Completed: 01/04/94

Client Code: PHI08

SAMPLE IDENTIFICATION

<u>Sample Number</u>	<u>Sample Description</u>	<u>Sample Number</u>	<u>Sample Description</u>
01	K30-9051-A	02	K30-9051-B

ND = None Detected D_F = Dilution Factor NT = Not Tested
B = Analyte was present in the blank J = Estimated value
E = Estimated Value, Concentration exceeds calibration range
MULTIPLY THE LIMIT BY THE DILUTION FACTOR.

Marleah M. Martin
Certified By
Marleah Martin



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REPORT

Work Order # 93-12-203

Received: 12/23/93

Results By Test

TEST CODE	Sample 01	Sample 02
default units	(entered units)	(entered units)
PRCTSX	N/A	N/A
% (Percent)		
TCLPXX	N/A	N/A
N/A		
TCVHGX	N/A	N/A
N/A		
TFAAX	N/A	N/A
N/A		
TGFAAX	N/A	N/A
N/A		
WCVHGX	N/A	N/A
N/A		
WFAAX	N/A	N/A
N/A		1/A
WGFAAX	N/A	N/A
N/A	1/A	



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REPORT

Work Order # 93-12-203

Received: 12/23/93

Result: by Sample

SAMPLE ID K30-9051-AFRACTION 01CTEST CODE 1METALNAME TCLP METALS/1311/SW846 AADate & Time Collected 12/23/93 09:10:00Category LIQUID

PARAMETER	RESULT	LIMIT	D_F	DATE_EXT	DATE_ANAL
Arsenic, As	<u>ND</u>	<u>0.0050</u>	<u>1.0</u>	<u>12/28/93</u>	<u>12/28/93</u>
Barium, Ba	<u>ND</u>	<u>0.50</u>	<u>1.0</u>	<u>12/28/93</u>	<u>12/29/93</u>
Cadmium, Cd	<u>ND</u>	<u>0.0030</u>	<u>1.0</u>	<u>12/28/93</u>	<u>12/28/93</u>
Chromium, Cr	<u>ND</u>	<u>0.020</u>	<u>1.0</u>	<u>12/28/93</u>	<u>12/28/93</u>
Lead, Pb	<u>ND</u>	<u>0.10</u>	<u>1.0</u>	<u>12/28/93</u>	<u>12/28/93</u>
Mercury, Hg	<u>0.0005</u>	<u>0.00020</u>	<u>1.0</u>	<u>12/27/93</u>	<u>12/27/93</u>
Selenium, Se	<u>0.006</u>	<u>0.0050</u>	<u>1.0</u>	<u>12/28/93</u>	<u>01/03/94</u>
Silver, Ag	<u>0.42</u>	<u>0.010</u>	<u>1.0</u>	<u>12/28/93</u>	<u>12/28/93</u>

Notes and Definitions for this Report:

ANALYST KIIUNITS mg/L

BATCH_ID _____ WFAA-025, WGFAL-035

TCLP_XT_DATE _____



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REPORT

Work Order # 93-12-203

Received: 12/23/93

Results by Sample

SAMPLE ID K30-9051-AFRACTION 01A TEST CODE WFLASH NAME FLASH POINT/SW846 1010Date & Time Collected 12/23/93 09:10:00 Category LIQUID

PARAMETER	RESULT	LIMIT	D_F	DATE_ANAL	:
Flash Point	<u>> 100</u>	<u>20</u>	<u>1.0</u>	<u>12/27/93</u>	

Notes and Definitions for this Report:

EXTRACTED _____

ANALYST JBUNITS Deg CentigradeBATCH_ID WFLASH-054

COMMENTS _____ N/A



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REPORT

Work Order # 93-12-203

Received: 12/23/93

Results by Sample

SAMPLE ID K30-9051-A

FRACTION 01A

TEST CODE WPH

NAME (pH/EPA 150.1)

Date & Time Collected 12/23/93 09:10:00

Category LIQUID

PARAMETER	RESULT	LIMIT	D_F	DATE_ANAL
pH	4.3	0.10	1.0	12/23/93

Notes and Definitions for this Report:

EXTRACTED _____

ANALYST ISH

UNITS pH Units

BATCH_ID WPH-159

COMMENTS _____ N/A

applicable to drinking surface
 water H₂O₃
 domestic industrial waste

organic solvent waste
 cont. acetone
 acetone would be quite

J.T. Baker Co.
 Baker pHX
 0-14
 one narrower range

sw-546

note - add to book
 at Lab. To Walter
 Dave
 Ch. 7

Sec. 7.2.2
 Method 9040
 Method 131 for disposal

→ add 95 mL 3rd H₂O
 → TCEP

if liquid not cloudy



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REPORT

Work Order # 93-12-203

Received: 12/23/93

Results by Sample

SAMPLE ID KJ0-9051-A FRACTION 01B TEST CODE WRCRAM NAME RCRA METALS/EPA AA
 Date & Time Collected 12/23/93 09:10:00 Category LIQUID

PARAMETER	RESULT	LIMIT	D_F	DATE_EXT	DATE_ANAL
Arsenic, As	<u>ND</u>	<u>0.0050</u>	<u>1.0</u>	<u>12/28/93</u>	<u>12/28/93</u>
Barium, Ba	<u>ND</u>	<u>0.50</u>	<u>1.0</u>	<u>12/28/93</u>	<u>12/29/93</u>
Cadmium, Cd	<u>ND</u>	<u>0.0030</u>	<u>1.0</u>	<u>12/28/93</u>	<u>12/28/93</u>
Chromium, Cr	<u>ND</u>	<u>0.020</u>	<u>1.0</u>	<u>12/28/93</u>	<u>12/28/93</u>
Lead, Pb	<u>ND</u>	<u>0.10</u>	<u>1.0</u>	<u>12/28/93</u>	<u>12/28/93</u>
Mercury, Hg	<u>0.0005</u>	<u>0.00020</u>	<u>1.0</u>	<u>12/27/93</u>	<u>12/27/93</u>
Selenium, Se	<u>ND</u>	<u>0.0050</u>	<u>1.0</u>	<u>12/28/93</u>	<u>01/03/94</u>
Silver, Ag	<u>0.45</u>	<u>0.010</u>	<u>1.0</u>	<u>12/28/93</u>	<u>12/28/93</u>

Notes and Definitions for this Report:

ANALYST NHUNITS mg/LBATCH_ID WCVAA-007, WFAA-025, WGFAA-035COMMENTS RESULTS REFLECT TOTAL METALS ANALYSIS

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REPORT

Work Order # 93-12-203

Received: 12/23/93

Results by Sample

SAMPLE ID K30-9051-AFRACTION 01A TEST CODE WREACT NAME REACTIVITY/SW846 7-3Date & Time Collected 12/23/93 09:10:00 Category LIQUID

PARAMETER	RESULT	LIMIT	D_F	DATE_ANAL
Sulfide	<u>NON-REACT</u>	<u>500</u>	<u>1.0</u>	<u>12/27/93</u>
Cyanide	<u>NON-REACT</u>	<u>250</u>	<u>1.0</u>	<u>12/28/93</u>

Notes and Definitions for this Report:

EXTRACTED 12/27/93ANALYST SKDUNITS mg/Kg of WasteBATCH_ID WREACT-15COMMENTS _____ N/A

DIC. M. UI S SUP SFC PRJ AC DCM UNIT : SHIP FROM 3. SHIP TO
RICE S QTY E ADR I O DIS PR RI /OG PRICE FB4469 8Z3047
ASJDCD LB 15 9Z3047 15 RDD PNT H 1. TOT PRICE 4. MARK FOR
\$23: \$345

24. DOC NBR & SUFFIX

Non-Regulated

Document # in picture
FB446940610038

5. DOC DT : 6. NMFC : 7. FRT : 8. TY CGO :
94061 : : : :

9. PS : 10. QTY REC : 11. UP : 12. UT WT :
U : 1 : 1 : :

13. UNIT CUBE : 14. UFC : 15. SL :
: : : 0

16. FRT CLS

17. UNCLASSIFIED
NOMEN HZD WASTE 6004 *23* XB3

18. TY CNT : 19. #CNT : 20. T WT : 21. T CU :

22. RECEIVED BY : 23. DATE :
J. Pico : *3 MAR 94*

TIN R401AR40618152 CONDEMNED

25. STOCK NBR
TRANS COPY

6750PHWD000A007

R920RW40610038

K30-9051-A

26. RIC, UI, QTY, COND, DIST, UNIT PRICE

SHIP TO ADDRESS: KIRTLAND AFB NM 87117

FRT CLASS NBR: EPA ID #:

DRMO EPA ID #/PH/SIGN/DATE:

TRANSPORTER EPA ID #/SIGN:

*THIS IS TO CERTIFY THE ABOVE MATERIALS ARE PROPERLY CLASSIFIED, DESCRIBED, PACKED, MARKED & LABELED & ARE IN PROPER CONDITION FOR TRANSPORTATION ACCORD-

27. ADDITIONAL DATA

ING TO THE APPLICABLE REGULATIONS OF DOT & EPA*

HM OR HW

CERTIFIED BY:

MS&D PH:

4

7406100384

94061/0621

INPUT DEVICE 01074

OUTPUT DEVICE 01074

DD FORM 1348-1A, NOV 87 ISSUE/RECEIPT DOCUMENT (FACSIMILE)

R21-4061
R21-4061





Document #

FB446.9 40610038

*see attached

DD FORM 1348