



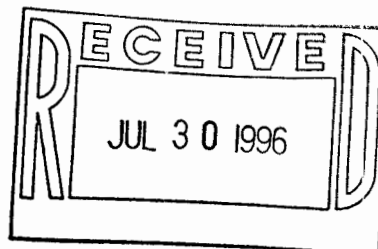
DEPARTMENT OF THE AIR FORCE
HEADQUARTERS 377TH AIR BASE WING (AFMC)

*Cornelius
Coby
File*
RECEIVED

25 July 1996

377 ABW/EMC
2000 Wyoming Blvd. SE
Albuquerque NM 87117-5659

Mr. Coby Muckelroy
Program Manager, RCRA Enforcement
Hazardous and Radioactive Materials Bureau
New Mexico Environment Department
P.O. Box 26110
2044A Galisteo
Santa Fe NM 87502



RE: Administrative Procedures for Rags; Permit Requirement for Laundering
EPA I. D. Number: NM 9570024423-1

Dear Mr. Muckelroy

On July 22, 1996 our staff met with you and Cornelius Amindyas to discuss the present proposal of laundering cloth maintenance rags contaminated with varying levels of petroleum hydrocarbons and RCRA constituents (metals). It was a mutual consensus at this meeting, no permit modification would be required for Kirtland to wash these rags on site.

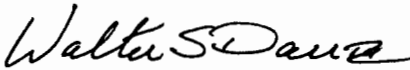
We are presently managing the rags on the flightline (see attachment 1) and will continue this procedure. We would like to have the rags not considered a solid waste, therefore not regulated as a hazardous waste, falling out of the RCRA requirements. If the rags are no longer regulated as a hazardous waste, this would greatly impact our waste minimization effort (over 10 tons per year). KAFB would truly be living up to the spirit of complying with RCRA's waste minimization, by reducing the amount of our hazardous waste generated.

KAFB1793



If you have any questions, please contact Marsha Carra at (505) 846-7847 or myself at (505) 846-5037. We appreciate your help and cooperation.

Sincerely


WALTER S. DARR III
Chief of Compliance
Environmental Management Division

Attachment:
Rag Management for Flightline

cc: Barbara Hoditschek
58 MXS/EMC

RAG MANAGEMENT PROCEDURES

The tool room is responsible for every tool and item required to support maintenance for aircraft, to include rags. All rags are accountable on the flightline. The following procedure is used to ensure 100% accountability:
This procedure would not change with washing.

- Each employee is assigned a number
- All rags are issued in either units of 1, 5 or 10 ea
- Each unit is assigned a bar code number
- Employees requiring rags must go to the tool room
- The tool room employee will input the employee's number and scan the bar code for the number of rags issued to him
- Employees must return all tools and rags to the tool room before the scanner system clears them at the end of any shift

Current System: Once rags are turned back to the tool room, segregation occurs depending upon the condition of the rag (slightly soiled, heavily soiled, hazardous waste, non-regulated waste).

Proposed System: With this system we would have bundles of clean rags for issue, a drum for slightly used rags (reusable) which can be reused depending upon the work task, and a drum for rags to be collected for laundering.