



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



13 MAY 1997

MEMORANDUM FOR SEE DISTRIBUTION

FROM: 377 ABW/EM

2000 Wyoming Blvd SE, Suite D4 Kirtland AFB NM 87117-5659 RECEIVED

MAY 2 0 1997

NM ENVIRONMENT DEPARTMENT OFFICE OF THE SECRETARY

SUBJECT: Class II Modifications for Kirtland Air Force Base (KAFB) Container Storage Unit Permit: EPA Permit ID No. NM9570024423

- 1. Enclosed for your review is the notice of modification for Kirtland Air Force Base's Container Unit Permit (attached).
- 2. If you have any questions, please contact me at (505) 846-2751, or my point of contact, Ms. Marsha Carra, Hazardous Waste Program Manager, (505) 846-0007.

AMES K. FRASER, Lt Col, USAF

Director

Environmental Management Division

Attachment:

State of NMED Ltr, 7 May 97



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Ms. Darlene Moore, Sandia National Laboratories

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Mr. Stephen Ward, Sandia National Laboratories

Secretary Mark Weidler, New Mexico Environment Department

Ms. Stephanie J. Witkowski, Siemens Stromberg-Carlson

Mr. Tom Wright, Sandia Environment



# State of New Mexico ENVIRONMENT DEPARTMENT Hazardous & Radioactive Materials Bureau 2044 Galisteo P.O. Box 26110 Santa Fe, New Mexico 87502 (505) 827-1557 Fax (505) 827-1544



MARK E. WEIDLER SECRETARY

EDGAR T. THORNTON, III
DEPUTY SECRETARY

# CERTIFIED MAIL RETURN RECEIPT REQUESTED

May 7, 1997

Mr. Terry Cooper, Director, Compliance Environmental Management Division Kirtland Air Force Base: 377ABW/EMC 2000 Wyoming Blvd. SE Albuquerque, New Mexico 87117-5659

RE: Class II Modifications for Kirtland Air Force Base (KAFB)
Container Storage Unit Permit:
EPA Permit ID No. NM9570024423

Dear Mr Cooper:

This letter is written with reference to your letter of August 19, 1996, which you faxed to HRMB on February 4, 1997. In that letter, you requested Class I Permit Modifications to your existing Container Storage Permit issued on July 24, 1990. However, the New Mexico Environment Department (NMED) Hazardous and Radioactive Materials Bureau (HRMB) determined that the changes you requested were Class II modifications. HRMB assessed and received the \$16,000.00 Class II Permit Modification fees.

In your letter of August 19, 1996, you explained that the request for Permit modification was based on your review of applicable regulations, and an inspection by the Defense Reutilization and Marketing Service.

Before the NMED makes a final decision on the subject draft permit modifications, the public is required to participate in the permitting process as specified in the New Mexico Hazardous Waste Management Regulations 20 NMAC 4.1, Subpart IX.

Pursuant to the New Mexico Hazardous Waste Management Regulations 20 NMAC 4.1.900 incorporating 40 CFR §270.42(b)(2), KAFB is required to send a notice of modification request to all persons on the enclosed facility mailing list as specified in 40 CFR §124.10(c)(ix). In addition, Kirtland must publish this notice in a major local newspaper of general circulation.

ATCH 1

Mr. Cooper, KAFB Page 2 May 7, 1997

This notice must be mailed and published within seven (7) calendar days from the date you receive this letter. In addition, KAFB must provide to the New Mexico Environment Department evidence of the mailing and publication.

Please send a copy of the notice as published in the newspaper, with a certificate of the date published to:

Robert S. (Stu) Dinwiddie, Ph.D., Manager RCRA Permits Management Program Hazardous and Radioactive Materials Bureau New Mexico Environment Department 2044 Galisteo Street Santa Fe, New Mexico, 87505

The public notice must include:

- (1) The announcement of a 60-day public comment period, including the start and end dates;
- (2) The location where copies of the permit, proposed modification requests and supporting documents can be viewed and copied. This location should be at a site accessible to the public in the vicinity of the permitted facility;
- (3) Announcement of a date, time, and place for a public meeting on the modification request, in accordance with §270.42(b)(2)(ii). Kirtland must hold a public meeting no earlier than 15 days after the publication of the notice, and no later than 15 days before the close of the 60-day comment period. The meeting must be held to the extent practicable in the vicinity of the permitted facility in accordance with §270.42(b)(4 and 5);
- (4) The following statement: "KAFB's compliance history during the life of the permit being modified is available from the NMED contact person."
- (5) Name, telephone number of KAFB's contact person; and
- (6) The name, address, and telephone number of New Mexico Environment Department Hazardous and Radioactive Materials Bureau contact person:

Cornelius Amindyas, Environmental Specialist Hazardous and Radioactive Materials Bureau New Mexico Environment Department 2044 Galisteo Street P.O. Box 26110 Santa Fe, New Mexico, 87502 (505) 827-1563 Mr. Cooper, KAFB Page 3 May 7, 1997

Any person who wishes to comment upon the draft permit modifications or to request a public hearing should submit written comments and requests, along with the commentor's name and address, to the NMED contact person. Requests for a public hearing shall state the nature of the issues proposed to be raised in the hearing and the name and address of the commentor. Only comments and/or requests received by HRMB during the 60-day public comment period will be considered. the NMED will provide a thirty (30) day notice of a public hearing, if scheduled.

After the conclusion of the 60-day comment period, the NMED will respond to the public comments received. All written comments submitted on the draft permit modifications will be considered in formulating a final decision. The NMED may modify the proposed permits based on the comments received. The NMED will notify KAFB and each person who submitted a written comment (during the public comment period) about the final decision.

After consideration of all written comments received, the NMED will approve, or modify and approve the draft permit modifications. If the NMED modifies and approves the draft permit modifications, then the NMED shall provide KAFB with a detailed written statement of reasons for the modifications and the modified draft permits will become the approved permit modifications. A copy of the modified pages of the Container Storage permit with a detailed statement of the reasons for the modifications will be mailed to KAFB.

Enclosed are copies of the proposed modifications for public review. If you have any questions regarding the modifications, please call me or Cornelius Amindyas at (505) 827-1563.

Sincerely,

Robert S. (Stu) Dinwiddie, Ph.D., Manager

RCRA Permits Management Program

Hazardous and Radioactive Materials Bureau

Enclosures

cc: Benito Garcia, Chief HRMB (w/o encl.)

David Neleigh, Chief, RCRA Permits EPA Region VI [6PD-N]

(w/o encl.)

FILE: Red KAFB 97

TRACK: KAFB, 5/7/97, KAFB, HRMB, Class II Permit Modification

KIRTLAND AIR FORCE BASE (KAFB) PROPOSED CLASS II PERMIT MODIFICATION: HAZARDOUS WASTE CONTAINER STORAGE UNIT. EPA ID NUMBER: NM9570042243

Modifications made to the KAFB Hazardous Waste Container Storage Unit Operational Permit issued to KAFB on July 24, 1990 are indicated as follows: Shaded areas indicate added material, while strikeouts indicate deleted material. The final decision on the proposed modifications will be made by NMED after the 60 day public comment period.

#### ITEM # 1:

Permit Attachment II-1, Special Procedures, Structures and Equipment, Section H, H-la, Page PA-II-1, p.2, second paragraph, under Loading and Unloading Operations, second line sentence reads: "Containers will be stored on wooden pallets approximately four feet by four feet in size." Change to read: "Containers will be stored on non-sparking pallets approximately four feet by four feet in size.

#### Permit Modification:

The proposed Permit Modification quoted in item # 1 is as follows:

H-la. Loading and Unloading Operations [40 CFR 270.14(b)(8)(i)]

Hazardous wastes are brought to the DRMO by many types of vehicles including pick-up trucks, forklifts and semi-tractor trailers. The drivers of these vehicles turn off their engines and either assist in unloading, wait in their vehicles or are escorted to a safe area such as the office area or another building with a designated reception area.

All containers when Loaded or unloaded will be sealed. Containers will be stored on wooden non-sparking pallets approximately four feet by four feet in size. Pallets with wastes can easily be lifted onto or off of trucks and storage racks using a forklift.

#### ITEM # 2

Permit Attachment II-1, Special Procedures, Structures and Equipment, Section H, H-1a, Page PA-II-1, p.3, top paragraph, third line, end of line. Replace "No person works alone unless a two-way radio is available for emergency communication" with 40 CFR 264.34 paragraphs (a) and (b) word for word (see attachment 1):

#### Permit Modification:

The Permit Modification proposed in Item # 2 is as follows:

Group II items originating from off the installation are subjected to the waste verification testing program as described in Section C-3c. No person works alone unless a two way radio is available for emergency communication. Whenever hazardous waste is being poured, mixed, spread, or otherwise handled, all personnel involved in the operation must have immediate access to an internal alarm or emergency communication device, either directly or through visual or voice contact with another employee, unless the Secretary has ruled that such a device is not required under §264.32.

If there is just one employee on the premises while the facility is operating, he must have immediate access to a device, such as a telephone (immediately available at the scene of operation) or a hand-held two-way radio, capable of summoning external emergency assistance, unless the Secretary has ruled that such a device is not under §264.32.

#### ITEM # 3:

Permit Attachment II-7, Contingency Plan, Section G, Appendix G-2, Page II-7, p. 24, Emergency Equipment Building 1024, remove the following: Spectacles, Bouton-U-Fit Clear Vent Sides, Goggles Splash, Gloves Butyl Rubber, Neoprene, Vinyl, Viton, Face Shield Half Face, and Foot Protectors Disposable. Add: Gloves, Work Type and change the last line to read: Emergency equipment is located in the storage locker on the south side of the staging area and along the same wall. Overpack drums are located in supply closets and outside storage racks.

#### Permit Modification:

The changes requested in item # 3 are as follows:

# Appendix G-2

# EMERGENCY EQUIPMENT BUILDING 1024

#### Equipment

	Minimum Quantity Maintained
Sorbent	150 lb
Apron Splash	2 each
Brooms	1 each
Shovels	1 each
Eyewash and Drench Shower	1 each
Manual Trip Fire Alarms	3 each
Spectacles	1 each
Spectacles Bouton U Fit Clear Vent Sides	<del>l each</del>
Goggles Clear	1 each
Goggles Splash	<del>l each</del>
Gloves, Rubber Full Length	1 pair
Gloves, Butyl Rubber, Neoprene, Vinyl, Viton	<del>- 1 pair each</del>
Sound Protector	l pair
Coverall Throw-way Type	l pair
Face Shield Half-face	<del>1 cach</del>
Face Shield Full-face	1 each
Foot Protectors Disposable	<del>l pair</del>
Hard hat	1 each
Rubber boots	1 pair
Overpack drums various sizes at each building	2 each
Gloves, Work Type	1 pair

Location of the supplies are shown Figure C 1 for building 1024 the overpack drums are in the staging area. Emergency equipment is located in the storage locker on the south side of the staging area and along the same wall. Overpack drums are located in supply closets and outside storage racks.

# ITEM # 4:

Permit Attachment II-7, Contingency Plan, Section G, Appendix G-2, Page II-7, p. 25, Emergency Equipment Building 615, Remove the following: Apron Splash, Gloves Butyl Rubber, Neoprene, Vinyl, Viton, Foot Protectors Disposable:

#### Permit Modification:

The Permit Modification requested in Item # 4 has been made as follows:

KAFB Proposed Permit Modification Page 3 of 5

# Appendix G-2

# EMERGENCY EQUIPMENT BUILDING 615

Equipment	Minimum Ouantity Maintained
Sorbent	50 lb
Apron Splash	<del>2 each</del>
Brooms	1 each
Spectacles	1 each
Gloves, Rubber Full Length	1 pair
Cloves, Butyl Rubber, Neoprene, Vin	
Coverall Throw-way Type	1 pair
Face Shield Full-face	1 each
Foot Protectors Disposable	
Hard hat	1 each
Rubber boots	1 pair
Portable Emergency Eyewash Bottle (	
Overpack drums 85 gal capacity	1 each
overpach drame of gar capacity	1 64611

# ITEM # 5:

Permit Attachment II-7, Contingency Plan, Section G, Appendix G-2, Page PA II-7, p. 26, Emergency Equipment Building 28009, Remove the following: Apron Splash; Spectacles Bouton-U-Fit Clear Vent Sides; Goggles splash; Gloves, Butyl Rubber, Neoprene, Vinyl, Viton and Foot Protectors Disposable.

#### Permit Modification:

The following are changes that have been made in response to the request of Item # 5:

# Appendix G-2

# EMERGENCY EQUIPMENT BUILDING 28009

### Equipment

# Minimum Ouantity Maintained

Sorbent	150 lb
Apron Splash	<del>-2 each</del>
Brooms	1 each
Shovels	1 each
Spectacles Bouton U Fit Clear Vent Sides	<del>-1-each</del>
Goggles Clear	1 each
Goggles Splash	<del>-1 cach</del>
Gloves, Rubber Full Length	1 pair
Gloves, Butyl Rubber, Neoprene, Vinyl, Viton	-1 pair each
Coverall Throw-way Type	1 pair
Faceshield Full-face	1 each
Foot Protectors Disposable	<del>-1 pair</del>
Hard hat	1 each
Rubber boots	l pair
Portable Eyewash	1 each
Deluge shower	1 each
Overpack drums 85 gallon capacity	2 each

#### ITEM # 6:

Module II, General Facility Conditions, II.H.6; Current Inventory, Page II-3. Delete the second sentence: "A printed copy of this inventory will be available outside each storage unit and outside the DRMO administration building, and will be immediately available to the Base Fire Chief at the Base fire station." to read: A copy of the inventory will be available in the adjacent office outside the fence line and will be immediately available to responding emergency personnel.

# II . H. 6. <u>Current Inventory</u>

The Permittee will maintain a current inventory, showing type, location and quantity of all hazardous materials and hazardous waste in storage in an accessible location. A printed copy of this inventory will be available outside each storage unit and outside the DRMO administration building, and will be immediately available to the base-fire chief at the base-fire station. A copy of the inventory will be available in the adjacent office outside the fence line and will be immediately available to responding emergency personnel.

# Subpart C-Preparedness and Prevention

# . § 264.30 Applicability.

The regulations in this subpart apply to owners and operators of all hazardous waste facilities, except as § 264.1 provides otherwise.

# § 264.31 Design and operation of facility.

#### ◆ OSWER--511

Facilities must be designed, constructed, maintained, and operated to minimize the possibility of a fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water which could threaten human health or the environment.

# § 264.32 Required equipment.

All facilities must be equipped with the following, unless it can be demonstrated to the Regional Administrator that none of the hazards posed by waste handled at the facility could require a particular kind of equipment specified below:

- (a) An internal communications or alarm system capable of providing immediate emergency instruction (voice or signal) to facility personnel;
- (b) A device, such as a telephone (immediately available at the scene of operations) or a hand-held two-way radio, expable of summoning emergency assistance from local police departments, fire departments, or State or local emergency response teams;
- (c) Portable fire extinguishers, fire control equipment (including special extinguishing equipment, such as that using foam, inert gas, or dry chemicals), spill control equipment, and decontamination equipment; and
- (d) Water at adequate volume and pressure to supply water hose streams, or foam producing equipment, or automatic sprinklers, or water spray systems.

[Comment: Part 270 of this chapter requires that an owner or operator who wishes to make the demonstration referred to above must do so with Part B of the permit application.]

[45 FR 33221, May 19, 1980, as amended at 48 FR 14294, Apr. 1, 1983]

# § 264.33 Testing and maintenance of equipment.

All facility communications or alarm systems, fire protection equipment, spill control equipment, and decontamination equipment, where required, must be tested and maintained as necessary to assure its proper operation in time of emergency.

#### § 264.34 Access to communications or alarm system.

- (a) Whenever hazardous waste is being poured, mixed, spread, or otherwise handled, all personnel involved in the operation must have immediate access to an internal alarm or emergency communication device, either directly or through visual or voice contact with another employee, unless the Regional Administrator has ruled that such a device is not required under § 264.32.
- (b) If there is ever just one employee on the premises while the facility is operating, he must have immediate access to a device, such as a telephone (immediately available at the scene of operation) or a hand-held two-way radio, capable of summoning external emergency assistance, unless the Regional Administrator has ruled that such a device is not required under § 264.32.

#### § 264.35 Required aisle space.

The owner or operator must maintain aisle space to allow the unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment to any area of facility operation in an emergency, unless it can be demonstrated to the Regional Administrator that aisle space is not needed for any of these purposes.

[Comment: Part 270 of this chapter requires that an owner or operator who wishes to make the demonstration referred to above must do so with Part B of the permit application.]

[45 FR 33221, May 19, 1980, as amended at 48 FR 14294, Apr. 1, 1983]