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State of New Mexico  
**ENVIRONMENT DEPARTMENT**  
Hazardous & Radioactive Materials Bureau  
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MARK E. WEIDLER  
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DEPUTY SECRETARY

CERTIFIED MAIL

RETURN RECEIPT REQUESTED

September 26, 1997

James R. Frazer, Lt. Col., USAF, Director  
Environmental Management Division  
377 ABW/EMC; 2000 Wyoming Blvd SE  
Kirtland Air Force Base NM 87117-5659

**RE: APPROVAL OF PERMIT MODIFICATION FOR CONTAINER STORAGE UNIT  
EPA ID NUMBER: NM9570024423-1**

Dear Colonel Frazer:

The New Mexico Environment Department (NMED) Hazardous and Radioactive Materials Bureau (HRMB) has completed review of Kirtland Air Force Base's (KAFB's) Class II Permit Modification for the hazardous waste Container Storage Unit. HRMB acknowledges receipt of the sixteen thousand dollars (\$16,000.00) permit modification fees which KAFB submitted in April 1997.

In your request for permit modification, you stated in your letter of August 19, 1996 that the changes you wished to effect were based upon your review of applicable regulations and an inspection conducted by the Defense Reutilization and Marketing Service.

NMED tentatively approved your request to some equipment that were listed several times in the same roster, and asked KAFB to subject the proposed modifications to public review.

KAFB promulgated a 60 day public comment period from May 16, 1997 to July 14, 1997 as required by the New Mexico Hazardous Waste Management Regulations 20 NMAC 4.1.900 incorporating 40 CFR §270.42(b)(2-5). NMED received no comments from the public during the 60 day public comment period.

Based upon the above explanation, NMED hereby approves the KAFB Class II permit modification for the Container Storage Unit equipment and supplies area.

KAFB1887



Lt. Colonel Frazer, KAFB  
September 26, 1997  
Page 2

The effective date of approval of the permit modification is the date on which you receive this letter. The proposed changes to the Container Storage operational permit are shown on the first five (5) sheets of the enclosed attachment. The corrected portions of the permit text with the approved modifications incorporated can be found on the last six (6) sheets. These changes have been incorporated into the KAFB permit text of July 27, 1990, EPA ID # NM9570042243-1. You are required to incorporate the enclosed copies of the proposed and approved permit modifications into KAFB's Container Storage Permit that was previously issued by NMED.

If you have any questions on this matter please contact either Jerry Bober or Cornelius Amindyas at (505) 827-1562.

Sincerely,



Ed Kelley, Ph.D., Director  
Water and Waste Management Division

Enclosure

cc: Benito Garcia, Chief, HRMB  
David Neleigh, Chief, EPA Region VI  
Stu Dinwiddie, PM, HRMB  
Terry Cooper, KAFB  
Cornelius Amindyas, HRMB

FILES: KAFB, Red, 97  
TRACK: KAFB, 9/26/97, HRMB/CA, Permit Modification Approval



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

19 August 1996

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

Ms. Barbara Hoditschek  
New Mexico Environment Department  
Hazardous and Radioactive Materials Bureau  
P.O. Box 26110  
2044A Galisteo  
Santa Fe NM 87505

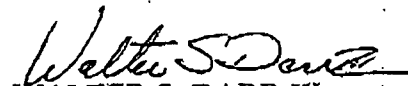
RE: Class I Modifications (NM9570024423)

Dear Ms. Hoditschek

This is a request for modifications to amend the Kirtland Air Force Base (KAFB) Part B, Hazardous Waste Operating Permit (NM9570024423). Please add the attached Class I Modifications (Atch 1) to the existing RCRA Part B Permit. These modifications are based on our review of all applicable regulations and an inspection conducted by the Defense Reutilization and Marketing Service (DRMS).

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

Respectfully

  
WALTER S. DARR III  
Chief of Compliance  
Environmental Management  
Division

Attachments:

1. 40 CFR, Part 264.34
2. Class I Modifications

## CLASS I MODIFICATIONS

Items

- # 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 paragraph (a) and (b) word for word. (see attachment 1)
- # 1 Permit Attachment II-1, Special Procedures, Structures and Equipment, Section H, H-1a, 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."
- # 3 Permit Attachment II-7 Contingency Plan, Section G, Appendix G-2, Page PA 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; Faceshield Half Face and Foot Protectors Disposable. Add: Gloves, Work Type and change the last line to read: Location of Emergency equipment is located in storage locker on the south side of staging area and along same wall. Overpack drums are located in supply closets and outside storage racks.*
- # A Permit Attachment II-17 Contingency Plan, Section G, Appendix G-2, Page PA II-7, p. 25, Emergency Equipment Building 615, *remove the following: Apron Splash; Gloves Butyl Rubber, Neoprene, Vinyl, Viton; Foot Protectors Disposable.*
- # 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.*
- # 6 Module II General Facility Condition, 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.

ATCH 2

## 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, capable 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]

PROPOSED PERMIT MODIFICATION

FOR

THE CONTAINER STORAGE UNIT'S JULY 27, 1990  
OPERATIONAL PERMIT:

KIRTLAND AIR FORCE BASE

SEPTEMBER 1997

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-1a, Page PA-II-1, p.2, second paragraph, under Loading and Unloading Operations, second line sentence reads: "Containers will be stores 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-1a. 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 the storage racks.

**Permit Modification:**

The changes requested in item # 3 are as follows:



Appendix G-2

EMERGENCY EQUIPMENT BUILDING 1024

Equipment

	<u>Minimum Quantity Maintained</u>
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
<del>Spectacles Bouton U Fit Clear Vent Sides</del>	<del>1 each</del>
Goggles Clear	1 each
<del>Goggles Splash</del>	<del>1 each</del>
Gloves, Rubber Full Length	1 pair
<del>Gloves, Butyl Rubber, Neoprene, Vinyl, Viton</del>	<del>1 pair each</del>
Sound Protector	1 pair
Coverall Throw-way Type	1 pair
<del>Face Shield Half face</del>	<del>1 each</del>
Face Shield Full-face	1 each
<del>Foot Protectors Disposable</del>	<del>1 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 G-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 the 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:

Appendix G-2

EMERGENCY EQUIPMENT BUILDING 615

<u>Equipment</u>	<u>Minimum Quantity Maintained</u>
Sorbent	50 lb
<del>Apron Splash</del>	<del>2 each</del>
Brooms	1 each
Spectacles	1 each
Gloves, Rubber Full Length	1 pair
<del>Gloves, Butyl Rubber, Neoprene, Vinyl, Viton</del>	<del>1 pair each</del>
Coverall Throw-way Type	1 pair
Face Shield Full-face	1 each
<del>Foot Protectors Disposable</del>	<del>1 pair</del>
Hard hat	1 each
Rubber boots	1 pair
Portable Emergency Eyewash Bottle (bldg 615)	1 each
Overpack drums 85 gal capacity	1 each

**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

<u>Equipment</u>	<u>Minimum Quantity Maintained</u>
Sorbent	150 lb
<del>Apron Splash</del>	<del>2 each</del>
Brooms	1 each
Shovels	1 each
<del>Spectacles Bouton U-Fit Clear Vent Sides</del>	<del>1 each</del>
Goggles Clear	1 each
<del>Goggles Splash</del>	<del>1 each</del>
Gloves, Rubber Full Length	1 pair
<del>Gloves, Butyl Rubber, Neoprene, Vinyl, Viton</del>	<del>1 pair each</del>
Coverall Throw-way Type	1 pair
Face Shield Full-face	1 each
<del>Foot Protectors Disposable</del>	<del>1 pair</del>
Hard hat	1 each
Rubber boots	1 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. Current Inventory

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.

APPROVED PERMIT MODIFICATION

FOR

THE CONTAINER STORAGE UNIT

KIRTLAND AIR FORCE BASE

TO BE

INCORPORATED INTO THE JULY 27, 1990  
OPERATIONAL PERMIT

SEPTEMBER 1997

Revision No.: 4  
Section H  
Kirtland

## Section H

### Special Procedures, Structures and Equipment

This section describes the procedures, structures, and equipment used at DRMO Kirtland to prevent or mitigate the following: hazards in unloading operations, runoff from hazardous waste handling areas, contamination of water supplies, equipment failure, and exposure of personnel to hazardous wastes. The information provided in this section is submitted in accordance with the requirements of 40 CFR 270.14 (b) (8).

H-1. Preventive Procedures, Structures, and Equipment [40 CFR 270.14 (b) (8) ]

H-1a. 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 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. The forklifts used at Building 1024 for hazardous waste storage handling will be designated as EE, per 29 CFR 1910.178, and will have a 4,000 pound capacity with extended reach. At building 615 and 28009 there are other MHE available such as handtrucks, dollies and other forklifts. The forklifts allow personnel to stack at any height on the racks from floor level to the third tier with equal ease. Non-sparking forklifts will be used whenever ignitable wastes are stored.

Movement will be minimized by having the wastes taken directly to their storage location after the inspection procedures, as described in Section C-3b, have been completed and the DRMO has determined that it will accept the waste. These procedures involve coordinating with the turn-in activity, checking documents (defense turn-in document) and labeling/marketing of the containers. Through these methods, DRMO personnel determine if the item is a Group I or Group II item and assigns a storage

location. Group II items originating from off the installation are subjected to the waste verification testing program as described in Section C-3c.

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.

In the event of a spill, spill response materials and equipment are available as discussed in Section G.

There are ramps for MHE to go over curbs and to move from one area to another where there are floor elevation changes.

H-1b. Runoff [40 CFR 270.14(b)(8)(ii)]

All buildings are totally enclosed with walls on all four sides and a roof. Each building has a perimeter curb and raised thresholds at all emergency personnel door exits to prevent the escape of interior spills to the outside. Doors to storage areas will remain closed unless an area is occupied by personnel. These structures will isolate waste from inclement weather and prevent any precipitation from entering the hazardous waste storage areas.

Each room and closet of building 1024 is physically separated to prevent a spill migrating between storage areas. The possibility of a spill migrating from the central corridor or staging area is greatly reduced by the level floors of these areas and by the roll-up doors at the entrance way to each storage area. Curbs prevent spill migration into storage closets that are accessed from the staging area/corridor.

The floor of building 1024 is sealed and coated with a chemically resistant epoxy sealant (see Appendix H-1 for information on epoxy coating) to prevent chemicals leaking through them. All concrete joints have an internal chemically resistant water stop and joint sealer. The epoxy sealant coating is applied on curbs and partition walls to a minimum height of six inches above the floor.

Kirtland will load/unload rear loading vehicles inside the building. Side-loading vehicles will be load/unload on the loading ramp. No outdoor loading/unloading will take place during precipitation events. The gate valve for the loading dock sump will be closed during loading/unloading. The dock area will be swept prior to any washdown. Ordinary washdowns (when no known unrecovered spills have occurred) may be conducted with the gate valve open. After a spill, spilled material will be recovered as much as possible prior to a washdown. Storage facility personnel will wash down the loading dock with technology capable of removing any spill residue. This post-spill washdown will be conducted with the gate valve closed and the washwater will be collected and disposed of as hazardous waste. Alternatively, the washwater may be analyzed for the parameters listed in Table C-3 of Attachment II-2 and discharged to the sewer if shown to be nonhazardous. KAFB will sample the soil beneath the loading dock sump outfall when necessary (after a spill or suspected spill), for pH, all TCLP metals or organics via GC-MS analysis.

DRMO will attempt to avoid loading and unloading during inclement weather if it is not possible to bring the loading vehicle completely inside the staging area and close the door. Should precipitation enter the building during loading/unloading, the liquid will be collected and managed as hazardous waste or tested for the presence of wastes being unloaded according to the procedures in Permit attachment II-2.

The daily inspection of the rooms when in use and immediate spill cleanup will prevent buildup of spill material in a room or closet which could lead to overflowing of the containment system.

H-1c. Water Supplies [40 CFR §270.14(b)(8)(iii)]

The hazardous waste storage facilities at DRMO Kirtland are not located near any reservoir or other surface water which may be used as a water supply. The cement floors at each of the storage facilities are in good condition and are free of any cracks or gaps which would allow free liquids to leak through the warehouse floors. They will contain any spills and prevent the release of any contaminants into ground water supplies.

H-1d. Equipment and Power Failure [40 CFR §270.14 (b)(8)(iv)]

These units will only store containerized waste; no automatic waste feed system will exist. In the event of a brief power interruption, all waste handling activities (loading, unloading, sampling, etc.) will cease until power can be restored. The hazardous waste facility operations are strictly storage operations.

Appendix G-2

EMERGENCY EQUIPMENT BUILDING 1024

Equipment

	<u>Minimum Quantity Maintained</u>
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
Goggles Clear	1 each
Gloves, Rubber Full Length	1 pair
Sound Protector	1 pair
Coverall Throw-way Type	1 pair
Face Shield Full-face	1 each
Hard hat	1 each
Rubber boots	1 pair
Overpack drums various sizes at each building	2 each
Gloves, Work Type	1 pair

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 the storage racks.



Appendix G-2

EMERGENCY EQUIPMENT BUILDING 615

<u>Equipment</u>	<u>Minimum Quantity Maintained</u>
Sorbent	50 lb
Brooms	1 each
Spectacles	1 each
Gloves, Rubber Full Length	1 pair
Coverall Throw-way Type	1 pair
Face Shield Full-face	1 each
Hard hat	1 each
Rubber boots	1 pair
Portable Emergency Eyewash Bottle (bldg 615)	1 each
Overpack drums 85 gal capacity	1 each

Appendix G-2

EMERGENCY EQUIPMENT BUILDING 28009

<u>Equipment</u>	<u>Minimum Quantity Maintained</u>
Sorbent	150 lb
Brooms	1 each
Shovels	1 each
Goggles Clear	1 each
Gloves, Rubber Full Length	1 pair
Coverall Throw-way Type	1 pair
Face Shield Full-face	1 each
Hard hat	1 each
Rubber boots	1 pair
Portable Eyewash	1 each
Deluge shower	1 each
Overpack drums 85 gallon capacity	2 each