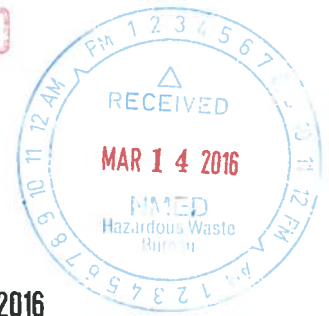




DEPARTMENT OF THE AIR FORCE
377TH AIR BASE WING (AFGSC)



MAR 13 2016

Colonel Eric H. Froehlich
377 ABW/CC
2000 Wyoming Blvd., SE
Kirtland AFB, NM 87117

Secretary Ryan Flynn
New Mexico Environment Department
Harold Runnels Building
1190 St. Francis Drive, Suite N4050
P.O. Box 5469
Santa Fe, NM 87505

Dear Secretary Flynn

Kirtland Air Force Base's Hazardous Waste Treatment Facility Operating Permit, as set forth in § 1.32, requires the senior executive officer having responsibility for the overall operations of Kirtland AFB to sign all applications, reports or other information submitted to the Department or required by the Permit, in accordance with 40 CFR §270.11(a)(3). This requirement normally does not pose a problem. However, during official travel there are those occasions when this signature requirement is cumbersome. When traveling, I frequently do not have access to administrative staff for assistance in receiving and or signing permit documents.

In an effort to simplify the signature process, Ms. Kathryn Lynnes (SAF/IEE-HQE) and Ms. Kathryn Roberts (NMED Resources Protection Division) have recently been discussing alternatives to simplify the signature process while maintaining permit compliance. One of those alternatives is the use of electronic/digital signatures. 40 CFR Part 3 provides for the use of electronic/digital signatures to satisfy reporting requirements in lieu of submitting a paper document for submissions required under Title 40, provided it complies with agency electronic/digital signature requirements. Current Department of Defense (DoD) and Air Force guidance requires each member of the service, including the installation commander, to obtain a common access card (CAC) to access its information systems. CAC cards provide a distinct, cryptographic certificate based logon identity for each holder through the use of an integrated circuit chip and DoD identification number. Electronic/digital signatures can be validated with the use of a digital signature viewer, thereby authenticating the document signature. If adopted by your Department, the use of electronic/digital signatures would simplify the signature process while I am on official travel by eliminating the need to locate and use administrative support staff. Documents could be received, electronically/digitally signed and returned the same day.

For those few occasions during official travel that I do not have email or computer access, a different alternative is required. For these limited occasions, I am proposing a limited delegation



of signature authority to the 377 ABW Vice-Commander. While Permit § 1.32 currently limits signatures to the senior executive officer, as identified in 40 CFR § 270.11(a)(3), 40 CFR § 270.11(b) allows the senior executive officer to delegate signature authority for reports required by permit and other information requested by the regulator, provided it is a written delegation identifying a person or position holding similar responsibility, that is submitted to the regulator. This limited delegation would allow the Vice-Commander to sign permit driven reports, work plans, permit deliverables and/or other documents containing information requested by NMED. It excludes signature authority for those documents affecting the permit, to include but not limited to applications and/or modifications. Your Department's approval of such a delegation would enhance our ability to provide timely submissions.

Your consideration of these two proposals is appreciated. If during your consideration, you have any questions or concerns about these two alternative processes, do not hesitate to contact me at (505) 846-7377 or Ms. Kathryn Lynnes at (505) 846-8703.

Sincerely

A handwritten signature in black ink, appearing to read 'E. Froehlich', written in a cursive style.

ERIC H. FROEHLICH, Colonel, USAF
Commander

-----Original Message-----

From: MILLER, APRIL M GS-07 USAF AFGSC 377 MSG [mailto:april.miller@us.af.mil]

Sent: Monday, March 14, 2016 11:12 AM

To: Flynn, Ryan, NMENV; Kendall, Jeff, NMENV; Roberts, Kathryn, NMENV; Kieling, John, NMENV

Cc: BITNER, LUDIE W GS-13 USAF AFCEC/CZO; BODOUR, ADRIA A CIV USAF HAF AFCEC/CZRX; BRANSON,

VICTORIA R GS-12 USAF AFCEC/CZO; Jercinovic, Devon; LYNNES, KATHRYN D HQE USAF AFGSC 377

MSG/SAF/IEE; reneep@ageiss-inc.com; SHUPE, JAMES B GS-14 USAF AFNWC AFNWC/JA; Simpler, Trent;

Steve Townsend

Subject: REQUEST:// KAFB Digital Signature and Limited Signature Delegation

Good Morning,

Please see the attached letter requesting approval/acceptance of digital signatures and limited signature delegation for KAFB's Hazardous Waste Treatment Facility Operating Permit.

If you have any questions please call Ms. Kathryn Lynnes at 505-846-8707 or email kathryn.lynnes@us.af.mil

April M. Miller
Admin Assistant
Office of Senior Advisor,
Kirtland Bulk Fuels Facility Project
(SAF/IEE-HQE)
505-846-8707
april.miller@us.af.mil



1111

