



DEPARTMENT OF THE AIR FORCE
377TH CIVIL ENGINEER DIVISION (AFGSC)



ENTERED



30 Aug 2022
 Received
 SEP - 6 2022
 Hazardous Waste Bureau

Mr. Gary J. Schneider
 Base Civil Engineer
 377th Civil Engineer Division
 2050 Wyoming Blvd SE
 Kirtland Air Force Base NM 87117

Mr. Rick Shean, Bureau Chief
 Hazardous Waste Bureau
 New Mexico Environment Department
 2905 Rodeo Park Drive East, Bldg 1
 Santa Fe, New Mexico 87505

Dear Mr. Shean

The purpose of this letter is to request an extension to the 90-day accumulation time period as described in 40 CFR 262.17(b) when hazardous wastes must remain on site for longer than 90 days due to unforeseen, temporary, and uncontrollable circumstances. The extension to the 90-day accumulation time is being requested for the three containers of hazardous waste described in the table below.

Container #	Size / Type	Weight (lbs)	EPA Codes	Accumulation Start Date (ASD)	ASD +90 days
202100472	1-gal, poly, open head	2	P001, P075	2 Jun 2022	31 Aug 2022
202200113	1-gal, poly, open head	2	P001, P075	3 Jun 2022	1 Sep 2022
202200320	5-gal, poly, open head	6	D003, D005, F003	8 Jun 2022	6 Sep 2022

On 5 July 2022, Kirtland Air Force Base (KAFB) received email notification from the Defense Logistics Agency (DLA) disposal contractor, Heritage Environmental (“Heritage”), that a fire had occurred at their incinerator, Heritage Thermal Services (HTS), on 27 June 2022, and that the facility had halted operations pending repairs. Heritage indicated in several subsequent telephone calls with KAFB Hazardous Waste Program staff that they were working to find an alternate treatment, storage, and disposal facility (TSDF) for KAFB waste that would normally be directed to HTS.

Because an alternate TSDF had not been located prior to KAFB’s next scheduled

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shipment (14 July), the three containers detailed in the table above were not shipped. KAFB subsequently added all three containers to the next DLA request for shipment (18 August), in hopes that an alternate TSDf would be located by the time of shipment. On 2 August 2022, Heritage informed KAFB via telephone that while they continue to work to secure alternate disposal arrangements for this waste, such arrangements are not yet in place and the waste therefore cannot ship.

Without alternate disposal arrangements in place, and given the four-week standard turn-around time between request to DLA and shipment, KAFB will not be able to ship these containers prior to exceeding 90-day accumulation requirements in late August/early September.

KAFB will continue to monitor the situation, both at Heritage Thermal Services and with alternate TSDFs, to ensure the waste ships as soon as possible. As of 25 August, Heritage did not have a return to service date for the HTS facility.

My point of contact for any questions regarding this situation is Mr. Isreal Tavarez, Chief, Environmental Compliance, at 505-846-8546 or isreal.tavarez@us.af.mil.

Sincerely


GARY J. SCHNEIDER, GS-15, DAF
Base Civil Engineer