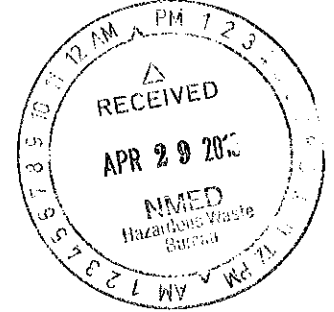




DEPARTMENT OF THE AIR FORCE  
HEADQUARTERS 49TH WING (AETC)  
HOLLOMAN AIR FORCE BASE NEW MEXICO



David G. Griffin  
Environmental Chief  
Holloman Air Force Base  
49 CES/CEIE – HAFB  
550 Tabosa Ave.  
Holloman AFB, NM 88330

John E. Kieling  
Chief  
Hazardous Waste Bureau  
2905 Rodeo Park Drive East, Building 1  
Santa Fe, New Mexico 87505-6313

**RE: NOTICE OF VIOLATION  
HOLLOMAN AIR FORCE BASE  
EPA ID# NM6572124422**

Dear Mr. Kieling:

On 28 March 2019, the New Mexico Environment Department (NMED) notified Holloman AFB of two pending Notices of Violation resulting from NMED Hazardous Waste Bureau Inspection of 25 February 2019. The violations were listed as follows:

1. Failure to containerize contaminated fuel filters in a proper container, which is a violation of 20.4.1.300 NMAC, incorporating 40 CFR 262.17(a)(1). During the inspection of the filtration room in Building 872, five fuel filters were located on the service room floor drying on absorbent pads. These filters were identified as hazardous waste (D001, D018) pertaining to Waste Profile #FC16-0058B. The process described to NMED Inspectors is to remove the fuel filters, place them on absorbent pads to reduce saturation, then place the filters in metal drums for shipment to the 90-day accumulation site.

**Corrective Action:** The notice of 28 March 2019 identified corrective actions for this violation as containerizing the hazardous waste filters upon their removal from filtration service and submit to NMED the current Standard Operating Procedure for removal of the filters and their waste management.

**HAFB Response:** At the time of the inspection visit to Building 872, there

was no one available with any knowledge as to why these five filters were sitting on absorbent pads on the floor. It took until the day after the NMED Inspectors completed their inspection to locate the maintenance crew from the Water and Fuel Shop that were responsible for the filters removal. The crew was conducting an investigation of the filtration system at the direction of the Air Force Fuels Laboratory at Wright-Patterson AFB, Ohio. The construction of Building 872 had just recently been completed and the filtration process was operating through its first winter. There were problems occurring during the cold night temperatures with the filtration units. They were experiencing severe pressure build up in the units, indicating a possible problem with the fuel, or the anti-icer additive, or the filter. Since such a filtration problem could be a threat to the aircraft flying at altitudes where the outside air temperatures were naturally quite cold, the problem required thorough investigation. This included the inspection of one or more filters at the Laboratory at Wright-Patterson AFB. The crew from the Water and Fuel Shop had arrived at Building 872 early in the morning, opened one of the filtration units and removed all six filters so they could determine which one(s) to ship to the Laboratory. Once the selection was made, they left the building to prepare the filter for shipment. Shortly after their departure was when the NMED inspector arrived and thus we found no one present with knowledge about the remaining filters sitting on drip pads on the floor. Very shortly after the inspector left, the crew returned to containerize the remaining filters as they were now destined for disposal. The containerized filters were transported to the 90-day facility per the Standard Operating Procedure. This investigation was a very unusual event, but critically necessary for the safe operation of our aircraft. Had the maintenance crew gone to building 872 to routinely replace filters, they would have arranged with the 90-day facility to have proper containers on-site for the direct deposit of the used filters once removed from the filtration unit. The Standard Procedure for removing filters and their proper containerization for disposal is shown in Attachment A and Attachment B is the email response from the Laboratory concerning the analysis of the filter.

2. Failure to obtain a permit for the treatment of hazardous waste, which is a violation of 20.4.1.900 NMAC, incorporating 40 CFR 270. During the inspection of the filtration room in Building 872, five filters were located on the service room floor drying on absorbent pads. These filters were identified as hazardous waste (D001, D018) pertaining to Waste Profile #FC16-0058B.

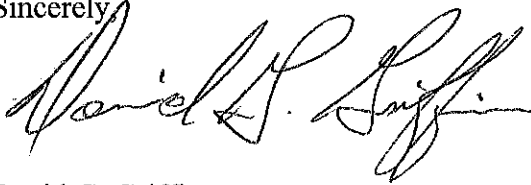
**Corrective Action:** The following actions must be completed to return this violation back into compliance: 1) Place the filters in proper containers upon removal; or 2) apply for a permit to treat the filters via an evaporation process; and 3) submit to NMED, the current version of the Standard Operating Procedure regarding the Removal of the filters and their waste management.

**HAFB Response:** We do not believe there is any need for a treatment permit. The description in our response to Violation 1. above, addressed the filters discovered on the floor of Building 872 that were involved in an investigation of a significant fuel problem and once a selection was made concerning which filter to ship to the Air Force Fuels Laboratory, the remaining filters were properly containerized for delivery

to our 90-day facility. The Standard Operating Procedure is Attachment A and Attachment B is the email response from the Laboratory concerning the filter.

If you have any questions or concerns, you can reach me at [David.Griffin.5@us.af.mil](mailto:David.Griffin.5@us.af.mil) or by phone at 575-572-6607. Holloman looks forward to successfully resolving these potential violations.

Sincerely

A handwritten signature in black ink, appearing to read "David G. Griffin". The signature is fluid and cursive, with the first name "David" being the most prominent.

David G. Griffin  
Environmental Chief  
Holloman AFB, NM

2 Attachments:

- A. Standard Operating Procedure for Replacement of Filters and Proper Disposal.
- B. Email from the Air Force Fuels Laboratory.

cc: Doug Hopinkah, NMED HWB

## ATTACHMENT A

### Standard Operating Procedure for Filter Replacement and Disposal

UFC 3-460-03, 10 November 2017

#### D-1.2 Coalescer Cartridge Replacement in Horizontal Filter Separator

A. After the vessel has been drained thoroughly, remove the head flange bolts and open the vessel. For the original KMU-416/F modification kit, use the following method:

a. Starting with the bottom (left) coalescer cartridge, loosen the 0.5-inch (12.7-millimeter) nut on the adapter mounting rod. Slowly drain the fuel trapped in the manifold by loosening the bottom coalescer cartridge.

b. After the fuel has been drained from the manifold, remove the fifteen coalescer cartridges on the outlet side of the manifold.

c. To remove the coalescer cartridge hold-down plate, use a screwdriver for leverage to pry the seals outward from the cartridge. The O-ring seals on the cartridge mounts may be removed more easily by applying a slight twisting motion instead of a direct pull.

d. Loosen and remove the victaulic coupling from the inlet pipe, sliding the sealing gasket down on the manifold pipe section. Be sure to use a static bonding wire.

e. Remove the manifold. This requires two people to slide the manifold forward, using the protruding coalescer cartridge hold-down rods as handles to help in removing the manifold. CAUTION: Have a container available to place the manifold in and catch fuel that might spill out of the manifold. Dispose of the used coalescer cartridges in an approved manner. Do not allow fuel-soaked coalescer cartridges to be left in the area or disposed of in a manner that can create a safety or fire hazard. Be careful when handling used coalescer cartridges because they are toxic and combustible or flammable, depending on the fuel's flashpoint.

f. Remove the separator cartridges and follow the steps outlined in Section D-1.3 when cleaning.

g. Clean the inside of the filter separator with rags.

h. Install new coalescer cartridges and cleaned separator cartridges on the manifold and reinstall the manifold.

i. Align and bolt in the victaulic coupling.

j. Replace cover and tighten bolts using the criss-cross method. Tighten nuts just enough to prevent leaking through the dome cover seal (refer to manufacturer's instructions for torque requirements) to eliminate possible damage to the vessel.

B. For modified KMU-416/F (300 gallons per minute (1135 liters per minute) ) kits with nine additional coalescer cartridges on the back side of the manifold, remove only the bottom front six coalescer

cartridges instead of all fifteen. This will balance the manifold, and make it easier to remove. Remove the manifold from the vessel.

C. For KMU-417/F kits (600 gallons per minute (2271 liters per minute)), leave all coalescer cartridges in place when removing the manifold. This provides balance and lets you remove the manifold easily.

### **Proper Packaging and Disposal of Spent Filters**

**A.** Prior to servicing filtration units where replacement of filter elements is scheduled or likely, contact the 90-day Hazardous Waste Site, 575-442-6288, Building 149, to schedule delivery of containers for the spent filters. Be sure to specify the location, the approximate number, and the size of filters so that the 90-day manager will supply the correct number and size containers to the correct location.

**B.** Follow the procedures in UFC 3-460-03 for opening and removing the filters from the filtration units. Once the filters are removed from the units place them directly in the Hazardous waste containers provided.

**C.** When a Hazardous Waste container is full, be sure to replace and seal the lid on the container.

**D.** Check the label, which should be pre-fixed on the container, to be sure the contents are consistent with the label. Note any discrepancies on the label.

**E.** Upon completion of the job and closing up the containers, notify the 90-day facility for pickup of the containers or notify the facility to schedule delivery to them.

**F.** The 90-day facility manager will notify you of any discrepancies/deficiencies identified following receipt and inspection of the containers. Make note of any issues so that they can be corrected and not repeated in future filter replacement.

# ATTACHMENT B

## Air Force Fuels Laboratory Filter Report

AFCEET LABORATORY REPORT  
AFCEET/PTPLA  
2430 C Street  
Building 78, Area B  
Wright-Patterson AFB, OH 45433-7632

Lab Report No:2019LA69490001      Date Received:03/05/19 1507 hrs\*      Date Sampled:02/26/2019\*\*  
Cust Sample No:FILTER ELEMENT      Date Reported:03/05/19 1732 hrs\*      Protocol:IA-UNK-0012

Sample Submitter:  
49 LRS/LGRF  
146 Delaware Ave  
Base Fuels  
Holloman AFB, NM 88330-7705

Reason for Submission: Unknown Filter Analysis  
Product: Filter  
Specification: N/A

Source: FS #5      Qty Submitted: 1 Filters

Method	Test	Min	Max	Result
IM	Light Microscopy		Report Only	See Below

### Dispositions:

For information purposes only.  
Coordinated with Ray Bunch (RTMT), phone: DSN 784-8106, COM 937-254-8106.  
Dissection of the Facet filter found the sock, cushion and fiberglass layers were nominal with one brown spot midway on the element. The interior micronic filter held black and brown particles of rust and dirt that are insufficient to cause any blockage.

Approved By      Date  
William J. Gomez      03/07/2019\*  
\\SIGNED\\

This report was electronically delivered to:  
49lrs.lgrf.fmt@us.af.mil, afpa.ptmt@us.af.mil, anthony.williams.86@us.af.mil,  
david.craycroft@us.af.mil, fredonic.basa.1@us.af.mil, jeremy.fleming@us.af.mil,  
payten.dampeere@us.af.mil, timothy.elliott.10@us.af.mil, william.gomez.5@us.af.mil

\* Date reflects Eastern Standard Time (EST)  
\*\* Date as provided by customer