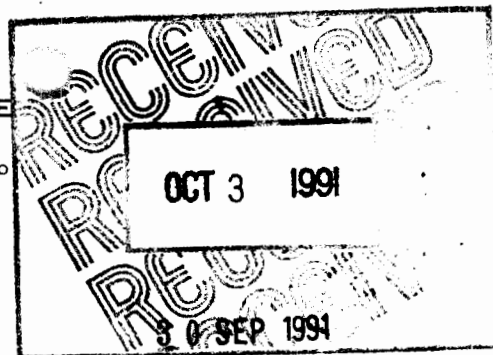




DEPARTMENT OF THE AIR FORCE
HEADQUARTERS 1606TH AIR BASE WING (MAC)
KIRTLAND AIR FORCE BASE, NEW MEXICO 87117-5000
P 073 893 744



Mr Ernest Preciado
New Mexico Environment Division
Hazardous and Radioactive Waste Bureau
1190 St Francis Drive, PO Box 26110
Santa Fe, New Mexico 87502

ENTERED

Dear Mr Preciado

You conducted a Resource Conservation and Recovery Act (RCRA) inspection at Kirtland Air Force Base (KAFB) from 6-9 Aug 91, which resulted in the New Mexico Environment Division (NMED) finding five (5) minor violations. They are listed below with corrective actions, and/or responses:

1. Waste exceeded 55 gallons at the Vehicle Maintenance Satellite Accumulation Point (SAP) outside Building 1058. This is a violation of HWMR-6, Part III, 40 CFR Section 262.34(c)(1).

- Corrective Action: At this SAP the only RCRA hazardous waste collected is paint related waste in a 55 gallon container. Other wastes being collected at the SAP are JP-4, anti-freeze, diesel fuel and motor oil.

Our Mr Darr called you and asked for your interpretation why KAFB received the above violation. You explained that it was too confusing for regulators to inspect a SAP that has RCRA hazardous waste and other wastes at the same location. You recommended that we should separate the two types of waste. We did move the location of the paint related drum to minimize this confusion. However, we do not understand how this could be a violation.

2. At the Corrosion Control and Refurbish Area (Bldg 482) a funnel to a 55 gallon drum of waste was not closed. This is a violation of Part VI, S265.173.

- Corrective Action: The funnel was removed from the empty drum and a bung cap was used to replace the funnel.

At the SAP there were two (2) containers. One container held 47 gallons of paint related waste which was closed and in compliance at this time. The other container with the funnel in the bung hole was empty and not being used. According to 40 CFR Section 265.173(a), a container holding hazardous waste must always be closed during storage, except when it is necessary to add or remove waste. The container in question was empty and was to be used only when the container in use was removed. Again, we do not understand how an empty container is a violation. However, we replaced the funnel anyway.

KAFB1163



3. A 10 gallon container of xylene and 55 gallon drum of blasting bead waste were unlabeled at the Corrosion Control and Refurbish Area (Bldg 482). A drum of PD680 was labeled only with the military specification number at the Air National Guard (Bldg 1046). This is a violation of Part III S262.34(c)(1)(ii).

- Corrective Action: As stated on the third page fourth paragraph of your letter, Notice of Violation, the 10 gallon container of xylene and the 55 gallon drum of blasting bead waste had been corrected before you left KAFB. We will continue to stress the importance of labeling and correct labeling in our training sessions.

The container labeled only with the military specification PD-680 is incorrect. The label on the container was 815 QR. This product is used as the cleaning agent in an ultrasonic process (Atch 1). The label "Hazardous Waste" was stenciled on the container.

4. At the SPS Armory (Building 20200) and Manzano Armory (Building 20245) rags were mixed with miscellaneous trash. This is a violation of Part III, S262.11. Until an adequate hazardous waste determination has been performed, these rags are presumed to be hazardous waste.

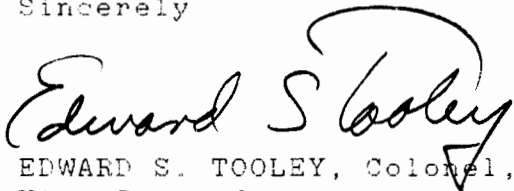
- Corrective Action: The SPS Armory building number should be changed to 20221 and the Manzano Armory building number should be changed to 30245. A letter was sent out to all users of solvent cleaning tanks changing the method of handling rags (Atch 2). Also all rags, paper wipes, and/or cotton swabs that come in contact with any U,P, or F wastes or JP-4 will be collected and disposed of as hazardous waste until a chemical analysis can be performed.

5. A storage building at DRMO the fire extinguisher had a 1988 inspection sticker. This is a violation of Part VI S265.33.

- Corrective Action: DRMO has provided an explanation for the date on the fire extinguisher (Atch 3). Again, we do not understand how placing the date of the last hydrostatic test that was performed on the fire extinguisher is a violation.

If you have any questions, please feel free to contact Walter S. Darr III at (505) 846-0029/0042.

Sincerely



EDWARD S. TOOLEY, Colonel, USAF
Vice Commander

3 Atch
1. MSDS 815QR
2. EM Ltr, 23 Sep 91
3. DRMO Ltr, 13 Sep 91

cc: Ms K. Sisneros
Ms T. Hughes
HQ MAC/LEEV

MATERIAL SAFETY DATA SHEET

150 ANG
ARTER / MUNITION

Per 29 CFR 1910.1200

DATE PREPARED : 1/1/90

SECTION I.

BRULIN & COMPANY, INC. P.O. BOX 270, INDIANAPOLIS, IN 46206-0270 (317) 923-3211

WEST COAST FACTORY
Richmond, California

SOUTHEASTERN FACTORY
Tampa, Florida

24 HOUR EMERGENCY NUMBER (317) 923-3233
CHEMTREC 1-800-424-9300

IDENTITY (As Listed On Label) 815 QR Health: 1
HMIS HAZARD RATINGS: Flammability: 0
Reactivity: 0

SECTION II. HAZARDOUS INGREDIENTS/IDENTITY INFORMATION

Hazardous Components (Specific Chemical Identity: Common Name(s))	CAS #	OSHA PEL	ACGIH TLV-TWA	OTHER LIMITS RECOMMENDED	PERCENT
Ethanolamine, 2-Aminoethanol, Monoethanolamine	141-43-5	3 PPM	3 PPM	STEL 6 PPM	5-10

SECTION III - PHYSICAL/CHEMICAL CHARACTERISTICS

Boiling Point: 212 F Specific Gravity (H2O=1): 1.067
 Vapor Pressure (mm Hg.): Ethanolamine 0.2 @ 68 F Melting Point: Approx. 30 F
 Vapor Density (Air=1): Ethanolamine 2.1 Evaporation Rate (water=1): 1.0
 Solubility in Water: Complete
 Appearance and Odor: Blue green liquid, citrus odor.

SECTION IV - FIRE AND EXPLOSION HAZARD DATA

Flash Point (Method Used): None Flammable Limits LEL: NA UEL: NA
 Extinguishing Media: Not Applicable
 Special Fire Fighting Procedures: None
 Unusual Fire and Explosion Hazards: None

SECTION V - REACTIVITY DATA

Stability Unstable Stable Conditions to Avoid: Freezing
 Incompatibility (Materials to Avoid): Strong oxidizers and acids.
 Hazardous Decomposition or Byproducts: Thermal decomposition can produce carbon monoxide, carbon dioxide, nitrogen oxides.
 Hazardous Polymerization May Occur May Not Occur Conditions to Avoid: None

Page 1

SECTION VI - HEALTH HAZARD DATA

Route(s) of Entry: Ingestion? No Skin? Yes Inhalation? Yes

Health Hazards (Acute and Chronic): Eye - Direct contact may cause irritation.
 Ingestion - May cause gastrointestinal irritation and irritation of mouth and throat.
 Skin - Prolonged or repeated contact may cause irritation.
 Inhalation - Excessive exposure may cause respiratory irritation.

Carcinogenicity: NTP? No IARC Monographs? No OSHA Regulated? No

Signs and Symptoms of Exposure: Eye contact may cause irritation, seen as redness and swelling.
 Prolonged skin contact may cause irritation, seen as redness.
 Excessive inhalation of mists may be irritating and cause coughing and discomfort in the nose throat and chest. Ingestion may cause pain or discomfort in the mouth, throat, and stomach.

Medical Conditions Generally Aggravated by Exposure: Ethanolamine may aggravate asthma and inflammatory or fibrotic pulmonary disease. May also aggravate an existing dermatitis.

Emergency & First Aid Procedures:

Inhalation: If affected, remove to fresh air.

Eye Contact: Flush with large amounts of water for at least 15 minutes lifting upper & lower lids occasionally. Get medical attention.

Skin Contact: Wash with mild soap and water. Remove contaminated clothing and launder before reuse.

Ingestion: If conscious, dilute by giving at least two glasses of water. Call a physician immediately.

SECTION VII - PRECAUTIONS FOR SAFE HANDLING AND USE

Steps To Be Taken In Case Material Is Released Or Spilled: Small spills - Flush to sanitary sewer with plenty of water.
 Large spills - Soak up on solid absorbent and shovel into containers for disposal.

Waste Disposal Method: Dispose of according to Federal, State and Local Laws and 40 CFR.

Precautions To Be Taken In Handling And Storing: Store between 40° and 120 F.

VIII - CONTROL MEASURES

Respiratory Protection (Specify Type): Not normally required. Use NIOSH-MSHA approved respirator if TLV of Ethanolamine is exceeded.

Ventilation: Local Exhaust: Special:
 Mechanical (General): Normally Sufficient Other:

Protective Gloves: Neoprene or butyl rubber on prolonged contact. Eye Protection: Goggles or safety glasses when handling conc.

Other Protective Clothing or Equipment: None

Work/Hygienic Practices: Avoid breathing spray mist.

1/12



DEPARTMENT OF THE AIR FORCE
HEADQUARTERS 1606TH AIR BASE WING (MAC)
KIRTLAND AIR FORCE BASE, NEW MEXICO 87117 - 5000

REPLY TO
ATTN OF:

EM (M. Carra, 6-2774)

23 SEP 1991

SUBJECT:

Safety Kleen Contaminated Rags (Ref: Letter dated 6 Sep 1991, same subject)

TO:

See Distribution

1. All shops presently using Safety Kleen (Part Numbers 6861, 699 or 6617) and using paper wipes/rags to wipe down parts will need to collect the rags for hazardous waste disposal.
2. This determination was made after review of the new Safety Kleen Material Safety Data Sheets (MSDS) for Safety-Kleen Immersion Cleaner and Cold Parts Cleaner and Safety-Kleen 105 Parts Washing Solvent (See attachments 1 and 2). This was also determined to be mandated by the New Mexico Environmental Division after the last inspection (6-9 August 1991).
3. Those organizations presently sending rags out for laundering, request you send Environmental Management the name and location of the laundry used. Discontinue this practice until further notice.
4. Please collect all paper wipes/rags contaminated with Safety Kleen. When a full bag has been collected, please submit an AF Form 2005 to 1606 ABW/EMC for pickup and disposal.
5. If you have any questions, please call Walter Darr or Marsha Carra at 846-2774.

Walter S. Darr III
WALTER S. DARR III
Chief of Compliance & Assessment

- 3 Atch
1. MSDS 6617
2. MSDS 6861,699
3. Dist List



DEFENSE LOGISTICS AGENCY
 DEFENSE REUTILIZATION AND MARKETING OFFICE-KIRTLAND
 BLDG 1025
 KIRTLAND AFB, NEW MEXICO 87117-6100

IN REPLY
 REFER TO

DRMO/YDL (Joseph Pecos/AV: 246-0371)

13 Sep 91

SUBJECT: (SITREP) Notice of Violation, New Mexico Hazardous Waste
 Management Regulations (HWMR-6)

TO: DRMR-OH
 Ken Bird

1. Reference: (a) DRMS-R 3135.1, Special Situation Reporting System Guidelines and Procedures, 29 May 1990. (b) DRMR-OHT letter, Reporting Time Frames for Regulatory Environmental SITREPS, 13 May 91. (c) DRMO/YDL (SITREP) Regulatory Inspection/State Agency dated 9 Aug 91.
2. The following information is provided as requested by referenced messages:
 - (a) Notice of Violation SITREP
 - (b) Location of Violation: DRMO Kirtland Building 28009, the Hazardous Waste Storage Facility.
 - (c) Date of Violation: 3 September 91
 - (d) Inspectors name: Ernest Preciado, Stephanie Stoddard, Will Moast and Gary Brannon from the State of New Mexico Environment Department
 - (e) Notice of Violation detected: (see violation #5 from the enclosed Notice of Violation dated September 3, 1991) Fire extinguisher at Building 28009 appeared to have a 1988 inspection sticker. The violation did not state that the inspection sticker was expired. This inspection sticker is for a six year hydrostatic test which was performed in October 1988.
 - (f) Action to resolve notice of violation: Received a transposed copy of the Facility Fire Prevention/Protection Record AF form 218 for building 28009. This record indicates that inspection are performed annually and a six year hydrostatic is not due until October 1994.
 - (g) Situation report submitted by Joseph Pecos, DRMO Kirtland
3. POC is Joseph Pecos DRMO Kirtland, AV: 246-0371.

Viola M. Wasson
 VIOLA M. WASSON, Chief
 DRMO-Kirtland

enclosures

Attn 3'



DEFENSE LOGISTICS AGENCY
DEFENSE REUTILIZATION AND MARKETING OFFICE-KIRTLAND
BLDG 1025
KIRTLAND AFB, NEW MEXICO 87117-6100

IN REPLY
REFER TO

DRMO/YDL (Joseph Pecos/AV:244-0371/afs)

9 August 1991

SUBJECT: (SITREP) Regulatory Inspection/State Agency

TO: DRMR-OH
Attn: Ken Bird

1. References: (a) DRMS-R 3135.1, Special Situation Reporting System Guidelines and Procedures, 29 May 90.

(b) DRMR-OHT letter, Reporting Time Frames for Regulatory Environmental SITREPS, 13 May 91.

2. The following information is provided as requested by referenced messages:

(a) Regulatory Environmental Inspection SITREP.

(b) Location of Inspection: DRMO-Kirtland Buildings 615 and 28009, which are located on Kirtland AFB in the city of Albuquerque, N.M.

(c) Date and Time of Inspection: 08 Aug 91, commencing at 09:00AM

(d) Inspectors names: Ernest Preciado
Stephanie Stoddard
Will Moast
Gary Brannon

Inspector's Agency: State of New Mexico Environmental Department
Compliance Division, Santa Fe, N.M.

(e) Deficiencies detected/documentated:

(1) #D9032 (State No. 00317402) Transporter did not date block 17 as required by 40 CFR 262.23.

(2) 40 CFR 264.15, General Inspection requirements require Safety and Emergency equipment to be checked regularly. State inspectors noted that the fire extinguisher at Bldg 28009 was expired as of Oct 1988.

(f) Action to resolve deficiencies:

(1) No action will be taken at this time to resolve this issue until further clarification is received from State of New Mexico Environmental Department.

(2) Fire extinguisher was taken to Kirtland AFB Fire Department for review. Air Force regulations require that a hydrostatic test be done every six years which is what the affixed sticker indicated. The last hydrostatic test was performed on Oct 1988 and the State Inspectors took this as the expiration date. Annual inspections are done by the fire department and are documented at their facility. This annual inspection check for pressure and physical damage is also due on a weekly basis according to DRMO inspection logs.

Attach 3

Page 2.

SUBJECT: (SITREP) Regulatory Inspection/State Agency

(g) Situation report submitted by Joseph Pecos, DRMO-Kirtland
AV:246-0371.

3. POC Joseph Pecos DRMO-Kirtland/AV:246-0371.


VIOLA M. WASSON, Chief
DRMO-Kirtland

Aten 3'

FACILITY FIRE PREVENTION/PROTECTION RECORD

1. BUILDING NO. <i>28009</i>	2. ORGANIZATION <i>1606 DRMO</i>	3. OCCUPANCY <i>HAZ Storage</i>	4. CONSTRUCTION		5. INSPECTION FREQUENCY	
			TYPE <i>II</i>	CLASS <i>N</i>	<input type="checkbox"/> QUARTERLY	<input checked="" type="checkbox"/> ANNUAL
					<input type="checkbox"/> SEMI-ANNUAL	<input type="checkbox"/> OTHER
6. FACILITY MANAGER/PHONE		7. FUNCTIONAL MANAGER/PHONE			8. ALTERNATE/PHONE	

9. FIRE DETECTION/SUPPRESSION/LIFE SAFETY FEATURES				11. SPECIAL INTEREST ITEMS					
<input type="checkbox"/>	AUTOMATIC	<input type="checkbox"/>	DELUGE	<input type="checkbox"/>	CARBON DIOXIDE	<input type="checkbox"/>	EMERGENCY LIGHTS		
<input type="checkbox"/>	MANUAL	<input type="checkbox"/>	WET SPRINKLER	<input type="checkbox"/>	DRY CHEMICAL	<input type="checkbox"/>	EXIT LIGHTS	<input type="checkbox"/>	FIRE LANES
<input type="checkbox"/>	LOCAL	<input type="checkbox"/>	DRY SPRINKLER	<input type="checkbox"/>	HALON	<input type="checkbox"/>	PANIC HARDWARE	<input type="checkbox"/>	ATTICS
<input type="checkbox"/>	SMOKE	<input type="checkbox"/>	PRE-ACTION SPRINKLER	<input type="checkbox"/>		<input type="checkbox"/>		<input type="checkbox"/>	DRAPES
<input type="checkbox"/>	HEAT	<input type="checkbox"/>	AFFF	<input type="checkbox"/>		<input type="checkbox"/>		<input type="checkbox"/>	FALSE CEILINGS
<input type="checkbox"/>	FLAME	<input type="checkbox"/>	OSCILLATING NOZZLES	<input type="checkbox"/>		<input type="checkbox"/>		<input type="checkbox"/>	SELF HELP PROJECTS
<input type="checkbox"/>	TRANSMITTER	<input type="checkbox"/>		<input type="checkbox"/>		<input type="checkbox"/>		<input type="checkbox"/>	FIRE DRILLS

10. FIRE EXTINGUISHERS						
TYPE	LOCATION	BASE NO.	SERVICE DUE	HYDRO DUE		
<i>DC 2718</i>		<i>1</i>	<i>9-91</i>	<i>10-94</i>	<input type="checkbox"/>	FIRE PROTECTION SYSTEMS
					<input type="checkbox"/>	OCCUPANT LOADING
					<input type="checkbox"/>	FIRE EXITS
					<input type="checkbox"/>	GREASE DUCTS/HOODS
					<input type="checkbox"/>	EXIT ACCESS
					<input type="checkbox"/>	TRAINING/CERTIFICATION
					<input type="checkbox"/>	SMOKING
					<input type="checkbox"/>	FIRE PREVENTION PROGRAM
					<input type="checkbox"/>	OCCUPANT KNOWLEDGE
					<input type="checkbox"/>	PRE-FIRE PLAN
					<input type="checkbox"/>	HOUSEKEEPING
					<input type="checkbox"/>	FIRE EXTINGUISHERS
					<input type="checkbox"/>	HEATING EQUIPMENT
					<input type="checkbox"/>	MECHANICAL ROOM
					<input type="checkbox"/>	ELECTRICAL EQUIPMENT
					<input type="checkbox"/>	FUEL HANDLING
					<input type="checkbox"/>	FLAMMABLE LIQUIDS
					<input type="checkbox"/>	STORAGE
					<input type="checkbox"/>	EXPLOSIVES

