



Gary E. Johnson
Governor

State of New Mexico
ENVIRONMENT DEPARTMENT

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Mark E. Weidler
Secretary

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Deputy Secretary

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

February 17, 1995

Mr. Walter Darr III,
Chief, Compliance
Environmental Management Division
377 ABW/EM
2000 Wyoming Blvd SE
Albuquerque, NM 87117-5659

RE: Hazardous Waste Rags Collection and Disposal

Dear Mr. Darr:

This is an acknowledgement of your letter of February 1, 1995, to the New Mexico Environment Department, Hazardous and Radioactive Materials Bureau (HRMB). In your letter you presented an eight step procedure for handling and disposal of the hazardous waste rags that you will be generating. Your procedures for the hazardous waste rags collection to wrangler boxes comprise the following steps:

- 1) All flightline personnel will be responsible for their own drum, log sheet and sampling data;
- 2) Each Initial Accumulation Point (IAP) will take the full drum to Defense Reutilization management office (DRMO) (building 1024) on specified days and times as determined by DRMO.
- 3) Upon arrival the IAP monitor will put the rags into the appropriate box (i.e. regulated rags D001, D006, and D007).
- 4) Each monitor will annotate the log with the drums as to their customer number, date, print their name and then sign.
- 5) The empty containers will be taken back to their IAP for reuse for the same waste stream of rags.
- 6) All non-regulated rags going for disposal will follow the same procedure as the regulated.

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- 7) IAP monitors will continue to keep the drum and ensure it is in good condition and marked properly in accordance with the KAFB Hazardous Waste Management Plan.
- 8) DRMO will ensure the boxes are covered at all times, when not being filled, the box will have the log sheets with the samples. Upon time for disposal, the rags will be compacted and manifested for shipment.

HRMB approves of your management of the hazardous waste rags that you will be generating. However, the subject hazardous waste rags are also subject to the following conditions:

KAFB may accumulate as much as 55 gallons equivalent of the hazardous waste rags at or near the initial accumulation point without a permit. If you accumulate more than 55 equivalent gallons of the hazardous waste rags, you will be subject to the 90 day storage requirements in compliance with New Mexico Hazardous Waste Management Regulations 20 NMAC 4.1.301 which incorporates Federal Regulations 40 CFR 262.34. Storage of the subject rags for more than 90 days will qualify you as an operator of a storage facility and you will be subject to the requirements of 40 CFR §264 and the permit requirements of 40 CFR §270; unless you have requested for, and have been granted an extension beyond the 90-day period.

If you have any questions regarding this matter you may contact Cornelius Amindyas at (505) 827-4308.

Sincerely,



Barbara Hoditschek, Manager
RCRA Permits Program
Hazardous and Radioactive Materials Bureau

cc: Benito Garcia, HRMB
Coby Muckelroy, HRMB
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File Reading