



DEPARTMENT OF THE AIR FORCE
HEADQUARTERS 377TH AIR BASE WING (AFMC)

19 January 1996

377 ABW/EMC
2000 Wyoming Blvd SE
Albuquerque NM 87117-5659

Ms. Barbara Hoditschek
New Mexico Environment Department
Hazardous and Radioactive Materials Bureau
P.O. Box 26110
2044A Galisteo
Santa Fe NM 87505

RE: Class II Modification (NM9570024423)

Dear Ms. Hoditschek

This is a request for modification to amend the Kirtland Air Force Base (KAFB) Part B, Hazardous Waste Operating Permit (NM9570024423). Please add the attached Class II Modifications (Atch 1) to the existing RCRA Part B Permit. The modification is based on our review of past and present procedures for training as stated in our 30 Nov 90 letter and the review of satellite accumulation regulations 40 CFR ~~265.34(c)~~ ^{262.} which do not identify any training requirements.

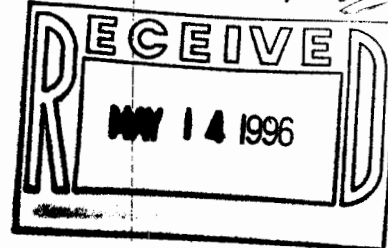
If you have any questions, please contact Ms Marsha Carra at (505) 846-7847/5037. We appreciate your help and cooperation.

Respectfully

Walter S. Darr III
WALTER S. DARR III
Chief of Compliance
Environmental Management
Division

Attachment:
Class II Modification

Handwritten signature



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Thanks
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CLASS II MODIFICATION

Section L-1(c)(1). Training of Generation Point Personnel

Delete our letter dated 30 Nov 90, and replace with "in accordance with 40 CFR, ~~265.34(c)~~
262.34(c)

✓ Delete PAII-5 pg 18 - 23

ATCH 1

§ 262.34**GENERATOR STANDARDS**

(A) A written description of procedures to ensure that each waste volume remains in the unit for no more than 90 days, a written description of the waste generation and management practices for the facility showing that they are consistent with respecting the 90 day limit, and documentation that the procedures are complied with; or

(B) Documentation that the unit is emptied at least once every 90 days.

In addition, such a generator is exempt from all the requirements in subparts G and H of 40 *CFR* part 265, except for §§ 265.111 and 265.114.

(2) The date upon which each period of accumulation begins is clearly marked and visible for inspection on each container;

(3) While being accumulated on-site, each container and tank is labeled or marked clearly with the words, "Hazardous Waste"; and

(4) The generator complies with the requirements for owners or operators in subparts C and D in 40 *CFR* part 265, with § 265.16, and with 40 *CFR* 268.7(a)(4).

(b) A generator who accumulates hazardous waste for more than 90 days is an operator of a storage facility and is subject to the requirements of 40 *CFR* Parts 264 and 265 and the permit requirements of 40 *CFR* Part 270 unless he has been granted an extension to the 90-day period. Such extension may be granted by EPA if hazardous wastes must remain on-site for longer than 90 days due to unforeseen, temporary, and uncontrollable circumstances. An extension of up to 30 days may be granted at the discretion of the Regional Administrator on a case-by-case basis.

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(c)(1) A generator may accumulate as much as 55 gallons of hazardous waste or one quart of acutely hazardous waste listed in § 261.33(e) in containers at or near any point of generation where wastes initially accumulate, which is under the control of the operator of the process generating the waste, without a permit or interim status and without complying with paragraph (a) of this section provided he:

(i) Complies with §§ 265.171, 265.172, and 265.173(a) of this chapter; and

(ii) Marks his containers either with the words "Hazardous Waste" or with other words that identify the contents of the containers.

(2) A generator who accumulates either hazardous waste or acutely hazardous waste listed in § 261.33(e) in excess of the amounts listed in paragraph (c)(1) of this section at or near any point of generation must, with respect to that amount of excess waste, comply within three days with paragraph (a) of this section or other applicable provisions of this chapter. During the three day period the generator must continue to comply with paragraphs (c)(1)(i) through (ii) of this section. The generator must mark the container holding the excess accumulation of hazardous waste with the date the excess amount began accumulating.

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(d) A generator who generates greater than 100 kilograms but less than 1000 kilograms of hazardous waste in a calendar month may accumulate hazardous waste on-site for 180 days or less without a permit or without having interim status provided that:

(1) The quantity of waste accumulated on-site never exceeds 6000 kilograms;

(2) The generator complies with the requirements of subpart I of part 265 of this chapter, except for §§ 265.176 and 265.178;

(3) The generator complies with the requirements of § 265.201 in Subpart J of Part 265;

(4) The generator complies with the requirements of paragraphs (a)(2) and (a)(3) of this section, the requirements of subpart C of Part 265, the requirements of 40 *CFR* 268.7(a)(4); and

RDB

(5) The generator complies with the following requirements:

(i) At all times there must be at least one employee either on the premises or on call (i.e., available to respond to an emergency by reaching the facility within a short period of time) with the responsibility for coordinating all emergency response measures specified in paragraph (d)(5)(iv) of this section. This employee is the emergency coordinator.

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24, 209,
247RCRA
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**377 ABW/EMC
2000 WYOMING BLVD. SE
KIRTLAND AFB, NEW MEXICO
87117-5659**

**FAX # DSN 246-0400
COMM (505) 846-0400**



ATTENTION: Cornelius



FAX#: 827-1544 **DATE:** 14 MAY **TIME:** 0715

FROM: MARSHA CAREA



PHONE #: 846 7847

NUMBER OF PAGES: 3 + leader



COMMENTS: Corrections to 19 Jan 96 letter, should have read 262.34(c) not 265. Sorry about that - Call if you have any more questions - Thanks Marsha