



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

30 January 1996

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

Mr. Coby Muckelroy
Program Manager, RCRA Enforcement
Hazardous and Radioactive Materials Bureau
New Mexico Environment Department
P.O. Box 26110
2044A Galisteo
Santa Fe, NM 87502

RE: Clarification on Satellite Accumulation Point Labeling Requirements

Dear Mr. Muckelroy

Environmental Management Compliance is requesting clarification on the labeling requirements for containers located at satellite (initial) accumulation points (SAP). This clarification is required for our needs due to the new Standard Operating Procedures (SOP) that our headquarters is requiring. Our headquarters require a hazardous waste label on every container located at the SAP.

It is my understanding that the regulations require us to mark the container with the words "Hazardous Waste" or the contents of the container. Furthermore, please give us guidelines on when containers should be labeled.

We wrote to headquarters and stated that our hazardous waste labels were not applied until they were picked up for transport to our Treatment Storage and Disposal Facility (TSFD). Until that time, we ensured each container was marked with the actual contents, a waste container log was maintained as well as a precontainer checklist stating when the drum was received.



Please send us clarification on the labeling procedures New Mexico Environment Department requires to ensure compliance. If you have any questions, please contact me at (505) 846-7847. We appreciate your help and cooperation.

Respectfully

A handwritten signature in black ink that reads "Marsha Carra". The signature is written in a cursive style with a large initial 'M' and a long, sweeping tail on the 'a'.

MARSHA CARRA
Hazardous Waste Program Manager
Environmental Management
Division