



Michelle Lujan Grisham
Governor

Howie C. Morales
Lt. Governor

**NEW MEXICO
ENVIRONMENT DEPARTMENT**

Hazardous Waste Bureau

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CERTIFIED MAIL - RETURN RECEIPT REQUESTED



James C. Kenney
Cabinet Secretary

Jennifer J. Pruett
Deputy Secretary

December 17, 2019

Colonel David S. Miller
Commander
377 ABW/CC
2000 Wyoming Blvd. SE
Kirtland AFB, NM 87117-5600

Melissa B. Clark
Chief, Environmental Management
377 MSG/CEIE
2050 Wyoming Blvd. SE, Bldg. 20685
Kirtland AFB, NM 87117-5663

**RE: SATELLITE ACCUMULATION AREA DETERMINATION
IAPs 144, 144Z, and 145
UNDERGROUND MUNITION MAINTENANCE STORAGE COMPLEX
KIRTLAND AIR FORCE BASE
EPA ID# NM9570024423**

Dear Col. Miller and Ms. Clark:

The New Mexico Environment Department ("NMED") has reviewed the Kirtland Air Force Base ("KAFB") request for a non-routine Satellite Accumulation Area ("SAA") or Initial Accumulation Point ("IAP") associated with the Kirtland Underground Munitions Maintenance Storage Complex ("KUMMSC"). The request was submitted on December 3, 2019 and describes the area as located in the KUMMSC complex, Buildings 27494/27496 at KAFB, NM. Further description provided includes:

1. KUMMSC operates a secure underground facility located on Kirtland Air Force Base. Specialized maintenance activities occur in two separate maintenance bays and one training bay within the KUMMSC facility.
2. Hazardous wastes generated within KUMMSC is associated with specialized maintenance actions and consists primarily of nitrile gloves, wipes, brushes, and specimen cups that have been contaminated with paints, solvents, corrosive compounds, heavy metals, and/or potentially low-level radioactive waste.

KAFB4917



3. The facility maintains inventory at a support section of the complex for all hazardous materials and consumables used in maintenance activities. All materials, including wastes are returned to this area and checked in for accountability purposes. Positive control of these items is constantly maintained in order to ensure proper management and to limit personnel exposure. IAPs 144, 144Z, and 145 (located in this section) are separated from the maintenance bays by multiple airlocks and security measures.
4. KAFB has determined that establishing and maintaining IAPs within each of these maintenance bays would hinder any potential emergency response, and that maintaining proper oversight of IAPs within the maintenance bays increases the potential personnel exposure.

NMED approves the use of non-routine SAAs (IAP) at the KUMMSC at the location identified in the request at "Cage", due to emergency response and personnel exposure concerns. If you have any questions, please contact Janine Kraemer at 505-476-4372 or by email at Janine.Kraemer@state.nm.us.

Sincerely,



Dave Cobrain
Acting Bureau Chief
Hazardous Waste Bureau

DC: ac

cc: Aaron Coffman, NMED HWB
Janine Kraemer, NMED HWB

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