

ATTACHMENT 9

CONTAINERS

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1.0 Container Management for Building 528

1.1 Use and Management of Containers

1.1.1 Description of Containers [40 CFR 264.171, 264.172]

Hazardous wastes generated on-site are stored and offered for transportation in containers conforming to Department of Transportation (DOT) specifications.

The applicable DOT specification code can be found on each container. Containers used to store and transport hazardous waste are either new, or recycled (that is the empty shipping container is saved and used to store and transport the material after use, e.g. trichloroethane).

The containers that are used are:

55 gallon steel drums with removable heads

55 gallon steel drums without removable heads

55 gallon polyethylene drums without removable heads

85 gallon steel drums with removable heads (overpack drums)

85 gallon polyethylene drums with removable heads (overpack drums)

8, 15, 20 and 30 gallon polyethylene drums without removable heads

8, 15, 20 and 30 gallon steel drums with removable heads

Other applicable DOT approved containers (to be determined on a case by case by the Environmental Office (EO))

The selection of the appropriate container for a particular waste is based on the compatibility of the container with the waste the container will hold. As an example, wastes that are corrosive (subcategory acidic) are stored and offered for transportation in polyethylene drums. Liquid wastes are collected in drums without removable heads.

1.1.2. Container Management Practices [40 CFR 264.172]

Containers used to store hazardous waste must be managed in such a way as to not cause the containers to release their contents. To insure that hazardous waste does not escape the container it is stored in, Tooele Army Depot (TEAD) manages containers in the following manner:

- a. Drums issued to store hazardous wastes are new. This insures the drums are free from severe defects (corrosion, dents and holes).
- b. Drums used to store hazardous waste are selected based on the compatibility of the material of fabrication of the drum (or drum liner) and the physical and chemical characteristics of the wastes they are to store.
- c. The lids to containers are kept closed and opened only when waste is added, removed or sampled.
- d. Liquid wastes are stored in drums without removable heads. This insures that the liquid contents will not be released if the drums are accidentally tipped over.

e. Reactive hazardous wastes (explosive subcategory) are stored in containers designed specifically to hold explosives and propellants.

f. Containers filled with reactive hazardous wastes (explosive subcategory) are stored in container storage Hazardous Waste Management Units (HWMUs) designed specifically for Propellant, Explosives and Pyrotechnic (PEP) materials (i.e. ammunition igloos and service magazines).

Movement of containers of hazardous waste are tracked by a unique container number that appears on the hazardous waste container label. Each container and its associated hazardous waste label are issued concurrently by the TEAD EO. This enables the EO to track the movement of containers from satellite accumulation points to 90-day storage areas, and if necessary to permitted container storage HWMUs. This system; 1) generates operating records, 2) insures that wastes in the 90-day storage area are moved to an off-site Treatment Storage and Disposal Facility (TSDF), or to an on-site permitted container storage HWMU before 90 days have expired, and 3) insures that the container contents match the container label since the container and label are issued to a pre designated location generating a defined and named waste stream.

To facilitate ease in movement and lessen the possibility of a forklift operator accidentally piercing a barrel with the forklift forks, containers are placed on pallets (maximum, three barrels per pallet) before moving. When barrels are weighed, barrel tongs are attached to the forklift to lessen the possibility of dropping or rupturing a barrel.

Containerized hazardous waste is transported from the generation points to the less than 90-day storage yard, or to the permitted storage facility at building 528 by a 1 ton or appropriate flatbed truck. The perimeter of the bed of the truck is slotted to allow for side boards.

Waste is loaded on to the truck by forklift, with the containers being placed on pallets before loading. The routes the truck uses to transport waste across the facility are graded/compacted dirt roads, asphalt, or concrete paved roads.

Building 528 is used to store containerized hazardous wastes that do and do not have free liquids. The storage arrangement to be used in building 528 is as follows:

a. All containerized hazardous waste are stored on pallets to elevate the containers being stored from any liquids that may accumulate on the storage area base. 55 gallon barrels will be stored no more than three to a pallet, 85 gallon barrels will be stored no more than two to a pallet. No more than 170 gallons of combined container volume will be stored per pallet.

b. There are four containment areas in Building 528. Each containment area will have a maximum six rows of pallets.

c. At a maximum, each row will be configured as seven pallets per row (with the exception being that the rows against the north wall will be configured with eight pallets per row. Bay 3 and 4 will each have one row of eight pallets).

- d. At a maximum, rows will be stacked two high.
- e. A minimum of 2.5 feet will be maintained between rows to allow for container inspection.

The container stacking arrangement used in Building 528 is shown in Appendix A.

Note: 170 gallons per pallet is chosen as a basis since containers of different volumes will be used to store wastes.

1.1.3. Secondary Containment System Design and Operation [40 CFR 270.15(a)(1), 264.175(a), 264.175(a), 264.175(d)]

The design of Building 528 allows for: a) the secondary containment of any liquids that may leak from containers stored there, b) the segregation of incompatible hazardous wastes, and c) the prevention of the accumulation of precipitation.

A drawing of the base of Building 528 and the bays that will be used to segregate incompatible wastes is in Appendix A. Bay 1 is used to store wastes that are sludges or solids and that are hazardous wastes by Toxicity Characteristic Metals (D004 through D011). Bay 2 is used to store corrosive wastes (D002 alkaline). Bay 3 is used to store ignitable and solvent wastes (D001 and F001 through F005). Bay 4 is used to store corrosive (D002, acidic) wastes. Hazardous wastes with U or P codes will be replaced in the appropriate bay using the aforementioned criteria.

Any wastes placed into storage that are reactive (D003, sulfide or cyanide producing) are stored in Bay 2.

1.1.4. Requirement for the Base or Liner to Contain Liquids [40 CFR 264.275(b)(1)]

The containment system of Building 528 is comprised of a square concrete slab, 75 feet on edge. The base is steel reinforced concrete six inches thick. The base is free of cracks or gaps. A six inch high, six inch wide berm (or curb) runs along the perimeter of the base to provide containment. The base is crowned in the center to cause any liquids that may be spilled to drain to one of the four corners.

A six inch high, six inch wide berm divides the base into four bays to allow for the storage of wastes with free liquids and the segregation of incompatible wastes. Each bay is equal in available secondary containment storage volume and storage area. Each bay is square shaped and has an available storage area of 36.75 ft x 36.75 ft = 1350 ft².

The impermeability of the concrete base is enhanced by a polyamide cured coating that is to be applied to the surface which is compatible with the types of waste that will be stored on the base.

An example of an acceptable coating is Semstone 245 High Performance Coating, or equivalent. The base of the secondary containment area will receive at least two applications to provide a

thickness of 40 mils when dry. The specifications of the example coating mentioned above, along with a compatibility table can be found in the TEAD EO.

1.1.5. Containment System Drainage [40 CFR 270.15(a)(2), 264.175.(b)(2)]

Drainage of the base of Building 528 is provided for. Each cell drains to the corner that is diagonal to the corner of the cell that is at the center of the base (refer to figure in Appendix A).

1.1.6. Containment System Capacity [40 CFR 270.15(a)(4), 264.175(b)(4)]

The volume of available secondary containment provided by the base of Building 528 in association with the container management practices used by TEAD is in compliance with the regulatory requirement.

Each of the four cells comprising the base is 36.75 feet in length and 36.75 feet in width, with a 6 inch high berm. The capacity of secondary containment for a single bay is $(36.75 \times 36.75)(\text{ft})^2 \times (12)^2 \times (12)^2 (\text{in})^2 (\text{ft})^2 \times 6 (\text{in}) \times 1 (\text{gal})/231 (\text{in})^3 = 5,051$ gallons of secondary containment capacity/cell.

The volume of containers stored in each cell is calculated by information given in Section 1.1.2 titled *Container Management Practices*.

Bays 3 and 4 each have one row that has 1 more pallet per row than Bays 1 and 2. Both Bays 3 and 4 will store containers stacked 2 high, therefore the maximum volume of containers stored in either Bay 3, or Bay 4 is $2 \times ((6 \text{ rows/cell} \times 7 \text{ pallets/row} \times 170 \text{ gallons/pallet}) + (1 \text{ pallet} \times 170 \text{ gallons/pallet})) = 14,620$ gallons/cell.

Bays 1 and 2 will store containers of hazardous waste similar to the arrangement used in Bays 3 and 4, except the maximum number of pallets for all rows is 7, stacked 2 high. Therefore, the maximum volume of containers stored in either Bay 1, or Bay 2 is $2 \times (6 \text{ rows/cell} \times 7 \text{ pallets/row} \times 170 \text{ gallons/pallet}) = 14,280$ gallons/cell.

The total volume of waste stored in Building 528 is:

Bays 1 and 2 = 2 cells x 14,280 gallons/cell = 28,560 gallons
Bays 3 and 4 = 2 cells x 14,620 gallons/cell = 29,240 gallons
Total = 57,800 gallons

The total available secondary containment volume is: 4 cells x 5,051 gallons/cell = 20,205 gallons.

Required secondary containment storage capacity is in this case 10% of the volume of the waste to be stored. Required secondary containment for 57,800 gallons of stored waste is 5,780 gallons. The available secondary containment capacity is 20,205 gallons. Considering the volume of wastes that will be stored in Building 528, the amount of secondary containment available exceeds that required by regulation by 3.5 times. The margin of excess secondary

containment is more than enough to compensate for any secondary containment volume that is unavailable because of pallets or floor ramps.

1.1.7. Control of Run-on [40 CFR 270.25(a)(4), 264.175(b)(5)]

Run-on into the containment system of Building 528 is prevented by the elevation of the secondary containment base relative to the surrounding terrain and the building shell.

The building shell of 528 completely covers the secondary containment base and is constructed of walls of metal siding and a gable roof which limit precipitation from contacting the secondary containment base. Continuous roof ventilators are gravity type and designed for a minimum capacity of 450 cubic feet of air per minute for each 10 foot section based on a wind velocity of 5 miles per hour and an exterior-interior temperature differential of 30 degrees F and without screens in place. Three clear panels on the East and West sides allow sufficient light on a sunny to slightly overcast days. If additional lighting is required, explosion proof lighting is provided along the centerline of the roof.

A review of the drawings found in Attachment 1 (Facility Description) will show there is no flood hazard within the boundaries of TEAD. In addition, the base of Building 528 is above the surrounding grade. The entrance used to move containers in and out of the building slopes up from the surrounding grade to the overhead door entrance.

Photographs of Building 528 (the building shell and the secondary containment base) can be found in Appendix B.

There is also a lined containment ditch surrounding Building 528. To allow for drainage away from the building, the side of the ditch next to the building is higher than the side which is opposite and away from the building. The liner installed beneath the base of Building 528 also runs beneath the containment ditch and extends 1 foot beyond the outer edge.

1.1.8. Removal of Liquids from Containment System [40 CFR 270.15(a), 264.175(b)(5)]

Liquid accumulating in the corners of any cell can be removed by use of an absorbent material or by means of a portable pump, depending on the size of the spill.

The collected liquid can then be analyzed if required. All containers in the storage area are labeled, and an analysis exists for the stored hazardous waste, so user knowledge as to the composition of any liquid hazardous waste accumulated in the secondary containment area will be sufficient in most circumstances, of the liquid originated from a leaking or ruptured hazardous waste container.

1.1.9. Special Requirements for Ignitable and Reactive Wastes [40 CFR 264.176]

A review of Figure 4 in Attachment 1, *General Facility Description*, will show that all HWMUs used to store ignitable or reactive wastes are further than 50 feet from the property line.

2.0 Container Management for Ammunition Igloos A101, C-815 and C-816, Service Magazines 1368 and 1370 and Above Ground Magazine 1205; Container Storage Facilities for Reactive (explosive) Wastes Without Free Liquids

2.1 Use and Management of Containers

2.1.1. Test for Free Liquids [40 CFR 270.15(b)(1)]

Igloos A-101, C-815 and C-816; Service Magazines 1368 and 1370 and Above Ground Magazine 1205, will be used to store hazardous wastes. There are no provisions for secondary containment in the design of these structures, therefore these areas will be limited to the storage of Reactive (explosive subcategory) hazardous wastes without free liquids, and debris contaminated with explosive residues without free liquids.

In most cases, Igloos A-101, C-815 and C-816; Service Magazines 1368 and 1370 and Above Ground Magazine 1205 will be used to store PEP materials scheduled for demilitarization (thermal treatment) at either the Subpart X (Open Burning/Open Detonation), or Subpart O (Incinerator) Hazardous Waste Management Units operated by TEAD. These storage areas will also be used to store treatability study samples that are Reactive (explosive subcategory).

The determination as to whether or not a waste contains free liquids can be made in 2 different ways:

a. User Knowledge - If the waste is an off-spec ammunition or off-spec PEP material previously stored at TEAD or Tooele Army Depot South Area (TEAD-S), the operator (TEAD) will have knowledge as to the characteristics of the waste relating to the presence or absence of free liquids. TEAD has a long history of storing, maintaining, and demilitarizing PEP materials. PEP materials that become hazardous waste were manufactured to government standards and this information is available through ammunition specification sheets and drawings. Therefore in most circumstances, user knowledge can be applied to determine if a waste has free liquids.

b. Physical Analysis - If there is doubt as to whether a waste contains free liquids, the waste will be analyzed for the presence of free liquids by using the Paint Filter Liquid Test (SW-846 method 9095).

NOTE: Since the type of hazardous waste to be stored in these areas is limited to Reactive (subcategory explosive), almost all the waste that is stored in Igloos A-101, C-815 and C-816; Service Magazines 1368 and 1370 and Above Ground Magazine 1205 will be discarded conventional munitions and ammunition.

2.1.2. Description of Containers [40 CFR 264.172, 264.172]

Containers used to store Reactive (explosive subcategory) hazardous waste in Igloos A-101, C-815, C-816; Service Magazines 1368 and 1370 and Above Ground Magazine 1205, are such that if the wastes were to be transported over public highways, no repackaging would be required. In other words, wastes are placed into storage in the same containers they are shipped in. The containers used to store hazardous wastes comply with DOT regulations for class A, B, and C explosives.

Hazardous wastes stored in Igloos A-101, C-815 and C-816; Service Magazines 1368 and 1370 and Above Ground Magazine 1205, will be generated both on and off-site. Wastes generated on-site come from: 1) off-spec PEP materials that were previously stored at TEAD as usable stock, or 2) wastes generated from the reconfiguration of munitions.

In the first case, the PEP materials were packaged to conform with DOT regulations for Class A, B, or C explosives at the time they were shipped to TEAD as usable product.

In the second case, the container that will be used to store PEP materials that are no longer useful because they were damaged during reconfiguration will be:

Containers designed specifically for PEP materials.

55 gallon steel drums with removable heads.

85 gallon steel drums with removable heads.

8 and 15 gallon steel drums with removable heads

2.1.3. Container Management Practices [40 CFR 264.172]

Containers used to store hazardous waste must be managed in such a way as not to cause the containers to release their contents. To insure that hazardous waste does not escape the container it is stored in, TEAD manages containers in the following manner:

- a. Drums issued to store hazardous wastes in are new drums. This insures that the drums used to store hazardous waste are free from severe defects (corrosion, dents, and holes).
- b. Drums used to store hazardous waste are selected based on the compatibility of the material of fabrication of the drum (or drum liner) and the physical and chemical characteristics of the wastes they are to store.
- c. The lids to containers are kept closed and opened only when waste is added, removed or sampled.
- d. Reactive hazardous wastes (explosive subcategory) are stored in containers designed specifically to hold explosives and propellants.
- e. Containers filled with reactive hazardous wastes (explosive subcategory) are stored in container storage Hazardous Waste Management Units (HWMUs) designed specifically to hold PEP materials (i.e. ammunition igloos and service magazines).

Movements of containers of hazardous waste are tracked by a unique container number that appears on the hazardous waste container label. Each container and its associated hazardous waste label are issued concurrently by the TEAD EO. This enables the EO to track the movement of containers from satellite accumulation points to 90 day storage areas, and if necessary to permitted container storage HWMUs. This system; 1) generates operating records, 2) insures that wastes in the 90 day storage area are moved to an off-site TSDF, or to an on-site permitted container storage HWMU before 90 days have expired, and 3) insures that the

container contents match the container label since the container and label are issued to a pre-designated location generating a defined and named waste stream.

To facilitate ease in movement and lessen the possibility of a forklift operator accidentally piercing a barrel or container with the forklift forks, containers are placed on pallets. Single containers are handled with barrel tongs that are attached to the forklift to lessen the possibility of dropping or rupturing the container.

Containerized hazardous wastes are moved from generation points to the appropriate HWMU by flat bed truck, tractor trailer, or van. The perimeter of open trailers and truck beds are slotted to allow for the placing of side rails (i.e. side boards). The vans and trailers used to move PEP items have rollers fabricated into the floor of the cargo area. This allows for ease in loading and unloading, however during transportation pallets must be kept in place by wood blocks positioned in such a way as to prevent the rollers from moving.

The containers are loaded onto trucks by forklift by first placing the containers on pallets. All roads used by vehicles transporting hazardous waste are made of graded/compacted dirt, asphalt, or concrete.

The geometry of Igloos A-101, C-815 and C-816 and Service Magazines 1368 and 1370 (semi-circular in cross section) allows for varying storage capacity depending on container dimensions (small containers give a tighter packing arrangement). Since different types and sizes of containers are used to store hazardous waste, and all containers of hazardous waste will be stored on pallets, a volume per pallet basis is used to determine the storage capacity of the HWMUs. The volume chosen is based on a theoretical ammunition pallet of 4 ft X 4 ft X 5 ft having a total volume of 80 cubic feet. The three most frequently used pallets are 40 inches X 48 inches, 42 inches X 53 inches and 36 inches X 40 inches. TEAD used 4 feet wide because the ammunition containers banded to the pallet can extend over a few inches and used four feet long because the 48 and 40 inch long pallets are the most common and the 53 inch long pallet the least common.

The management practices and storage arrangement for containerized waste without free liquids that are stored in Igloo A-101 is as follows:

All containers of hazardous waste will be stored on pallets to elevate the container above any accumulated liquids. Eighty cubic feet of combined container volume will be stored per pallet.

At a maximum, each row will be configured as three pallets per row, with two pallets at floor level and one pallet stacked on top of the pallet closest to the storage areas central aisle space.

Each side of the igloo will have at a maximum 9 rows.

A minimum of 2.5 feet will be maintained between rows to allow for container inspection.

This arrangement allows for the storage of:

$2 \text{ sides} \times 9 \text{ row/side} \times 4 \text{ pallets/row} \times 80 \text{ cubic feet /pallet} = 5,760 \text{ cubic feet.}$

A figure that shows the container storage arrangement used in Igloo A-101 is in Appendix A.

The management practices and storage arrangement for containerized wastes without free liquids that are stored in Igloo C-815 and Igloo C-816 are as follows:

- a. All containers of hazardous waste will be stored on pallets to elevate the container above any accumulated liquids. Eighty cubic feet of combined container volume will be stored per pallet.
- b. At a maximum, 54 pallets per row, 18 pallets long and three high will be stored.
- c. Three rows spaced a minimum of 2.5 feet apart and from the walls,

Use of the above storage arrangement gives Igloos C-815 and C-816 a storage capacity of: 3 rows x 54 pallets/row x 80 cubic feet/pallet = 12,960 cubic feet.

A figure that shows the container storage arrangement used in Igloos C-815 and C-816 is in Appendix A.

The management practices and storage arrangements for containerized wastes without free liquids that are stored in Service Magazines 1368 and 1370 are as follows:

- a. All containers of hazardous waste will be stored on pallets to elevate the containers from any accumulated liquids. No more than 80 cubic feet of combined container volume will be stored per pallet.
- b. At a maximum, ten pallets will be configured in a single row down the middle of each magazine with the maximum length of five pallets and a maximum height of two pallets.
- c. A minimum of 2.5 feet will be maintained clear between the rows and sidewalls to allow for container inspections.

Use of the above storage arrangement gives Service Magazines 1368 and 1370 a storage capacity of: 1 row x 10 pallets/row x 80 cubic feet/pallet = 800 cubic feet each.

A figure that shows the container storage arrangement used in Service Magazine 1368 and 1370 is in Appendix A.

The management practices and storage arrangements for containerized wastes without free liquids that are stored in Above Ground Magazine 1205 are as follows:

- a. All containers of hazardous waste will be stored on pallets to elevate the containers above any accumulated liquids. No more than 80 cubic feet of combined container volume will be stored per pallet.
- b. A maximum of 150 pallets per row, fifty pallets long and three high.
- c. Six rows spaced a minimum of 2.5 feet apart and from the walls.

Use of the above storage arrangement gives Above Ground Storage Magazine 1205 a storage capacity of: 6 rows x 150 pallets/row x 80 cubic feet/pallet = 72,000 cubic feet.

A figure that shows the container storage arrangement used in Above Ground Storage Magazine 1205 is in Appendix A.

2.2. Container Storage Area Drainage [40 CFR 270.15(b)(2), 264.175(c)]

Drainage for the storage area in Igloos A-101, C-815 and C-816 is provided by the crowned floor and the varying drainage gradient of the gutters which run down the length of both sides of the igloo. Igloos A-101, C-815 and C-816 are orientated relative to the drain field of the surrounding area so that the back of the igloo is at a higher elevation than the front (entrance). Water cannot drain into the igloo.

An additional operational procedure which enhances the limited drainage capabilities of Igloos A-101, C-815 and C-816 is the use of pallets to store containers on. Pallets raise the container holding hazardous waste above any liquid that may be introduced into the storage area.

Similar methods are used to keep moisture out of Service Magazines 1368 and 1370. Pallets are used to store containers on and the floor is sloped to cause the liquids to run towards the entrance. Water cannot drain into the service magazine.

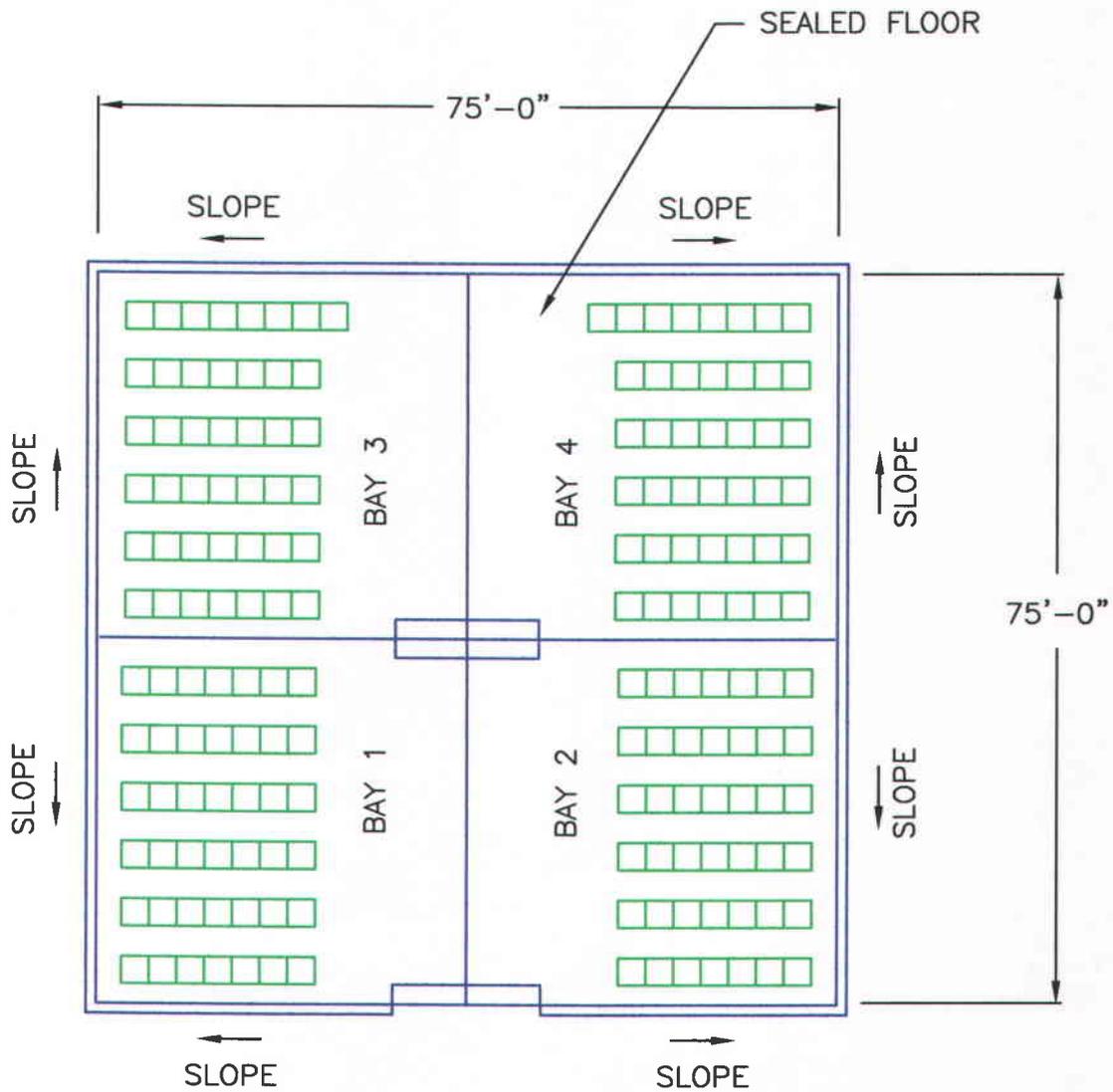
Hazardous wastes without free liquids are stored in Igloos A-101, C-815 and C-816; Service Magazines 1368 and 1370 and Above Ground Magazine 1205. The only way for liquid to enter these HWMUs is if the containers became wet by rain or snow while they were being transferred into the storage area. The Above Ground Service Magazine 1205 is elevated off the ground and water cannot drain into the structures. In addition, the containers are on pallets that elevate the waste off the floor.

Photographs can be found in Appendix B.

2.3. Special Requirements for Ignitable and Reactive Wastes [40 CFR 264.176]

A review of Figure 4 in Attachment 1, *General Facility Description*, shows that all HWMUs used to store ignitable or reactive wastes are located at least 50 feet from the property line.

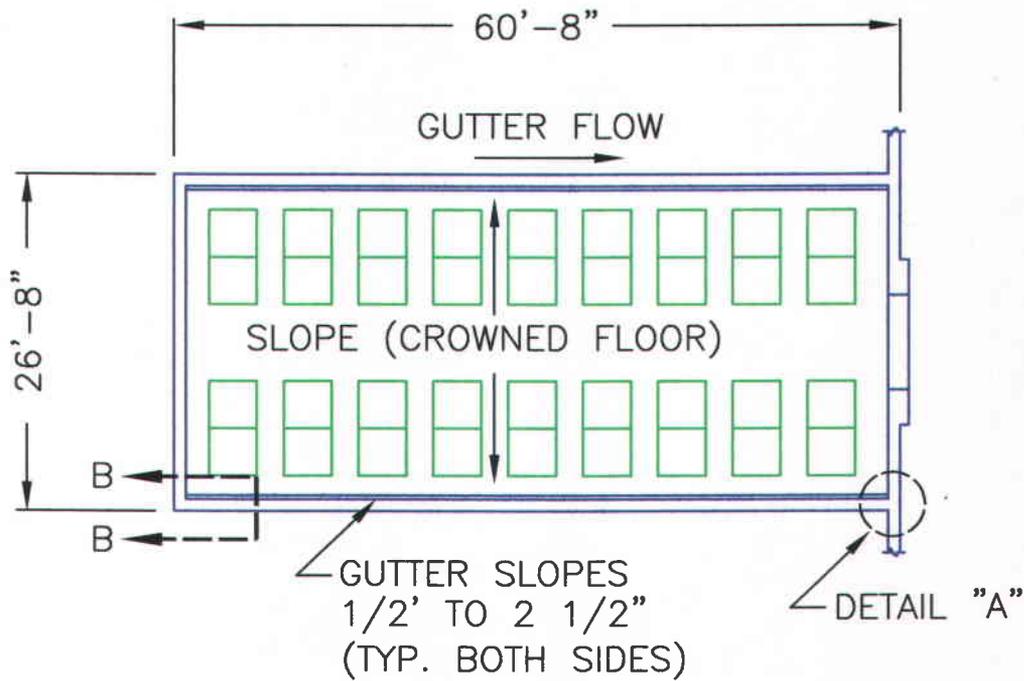
Appendix A
Container Storage Configurations



STACKING ARRANGEMENT:

- BAYS 1 & 2 – 6 ROWS OF 7 PALLETS, STACKED 2 HIGH (170 GL/PALLET)
- BAYS 3 & 4 – 5 ROWS OF 7 PALLETS, STACKED 2 HIGH (170 GL/PALLET)
- AND 1 6 ROW OF 8 PALLETS, STACKED 2 HIGH (170 GL/PALLET)

Bldg. 528
 Container Storage Configuration
 Figure A-1



STACKING ARRANGEMENT:

9 ROWS OF 2 PALLETS, STACKED 2 HIGH,
BOTH SIDES. TYPICAL PALLET IS 4' X 4'.

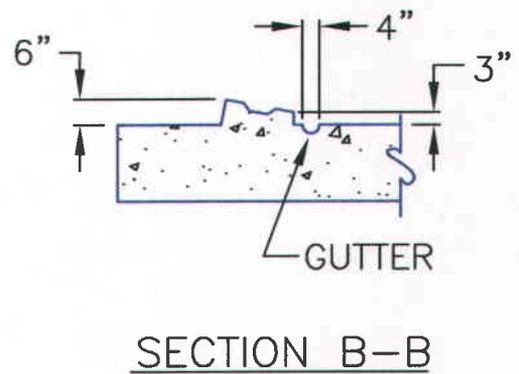
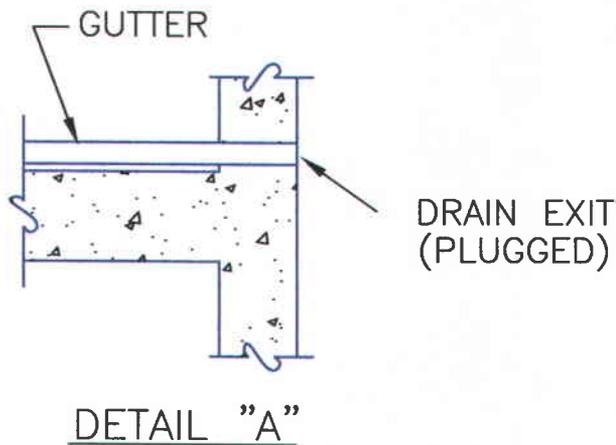
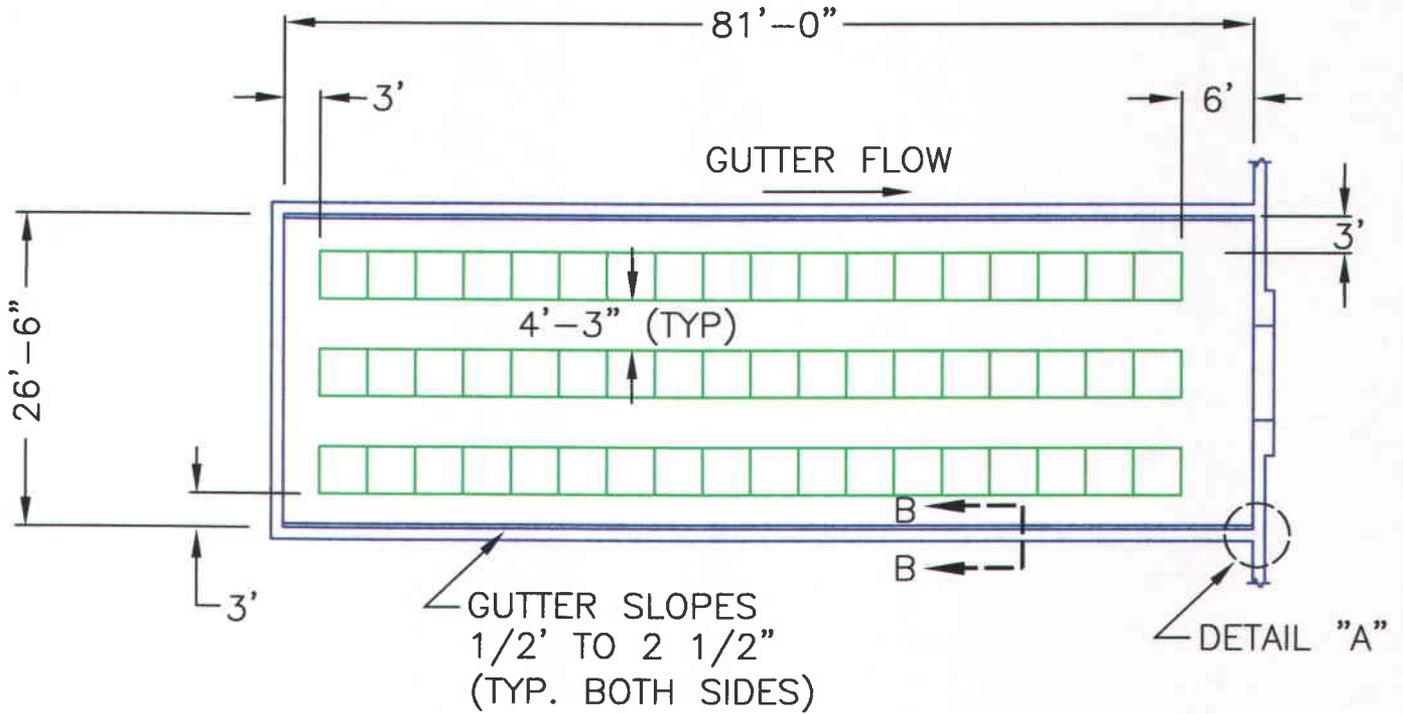


Figure A-2
Igloo A-101
Container Storage Configuration & Details

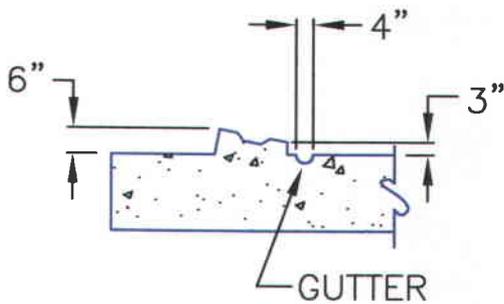


STACKING ARRANGEMENT

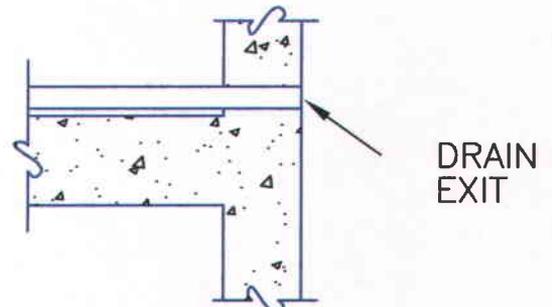
3 ROWS STACKED 3 PALLETS
HIGH, AND 18 PALLETS DEEP

NOTE:

IGLOO FLOOR IS CROWNED
AT CENTER OF FLOOR AND
SLOPES TO GUTTERS LOCATED
ON IGLOO SIDES.

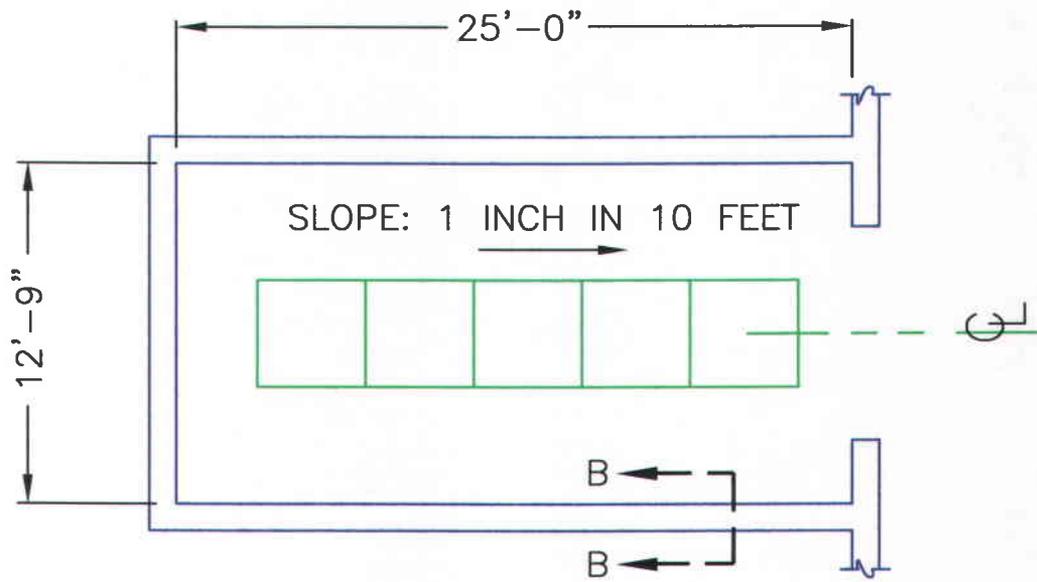


SECTION B-B



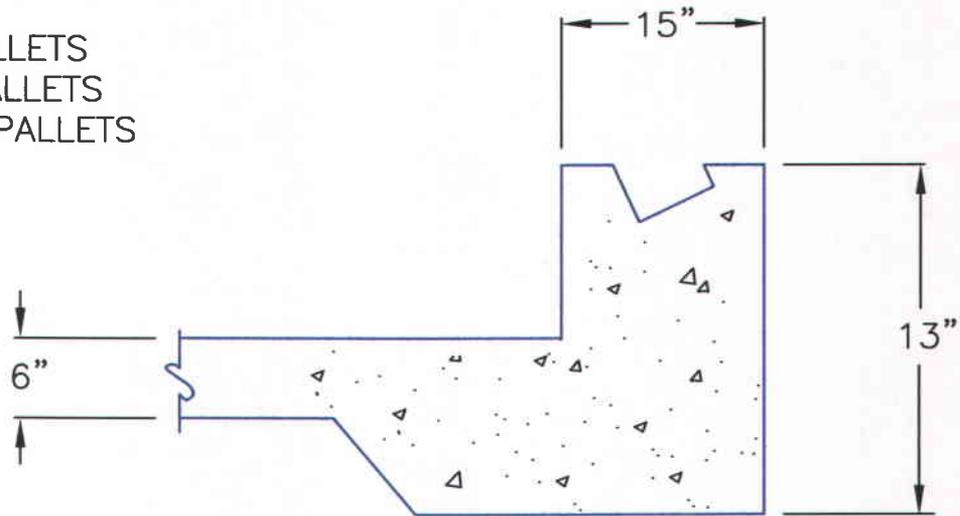
DETAIL "A"

Figure A-3
Igloo C-815 & C-816
Container Storage Configuration



STACKING ARRANGEMENT:

1 ROW OF PALLETS
 STACKED 2 PALLETS
 HIGH, AND 5 PALLETS
 DEEP.



SECTION B-B

Figure A-4
 Service Magazines 1368 & 1370
 Container Storage Configuration

STACKING ARRANGEMENT:
6 ROWS STACKED 3
PALLETES HIGH, EACH
ROW 50 PALLETES LONG.
A TYPICAL PALLET IS
4 FT. BY 4FT.

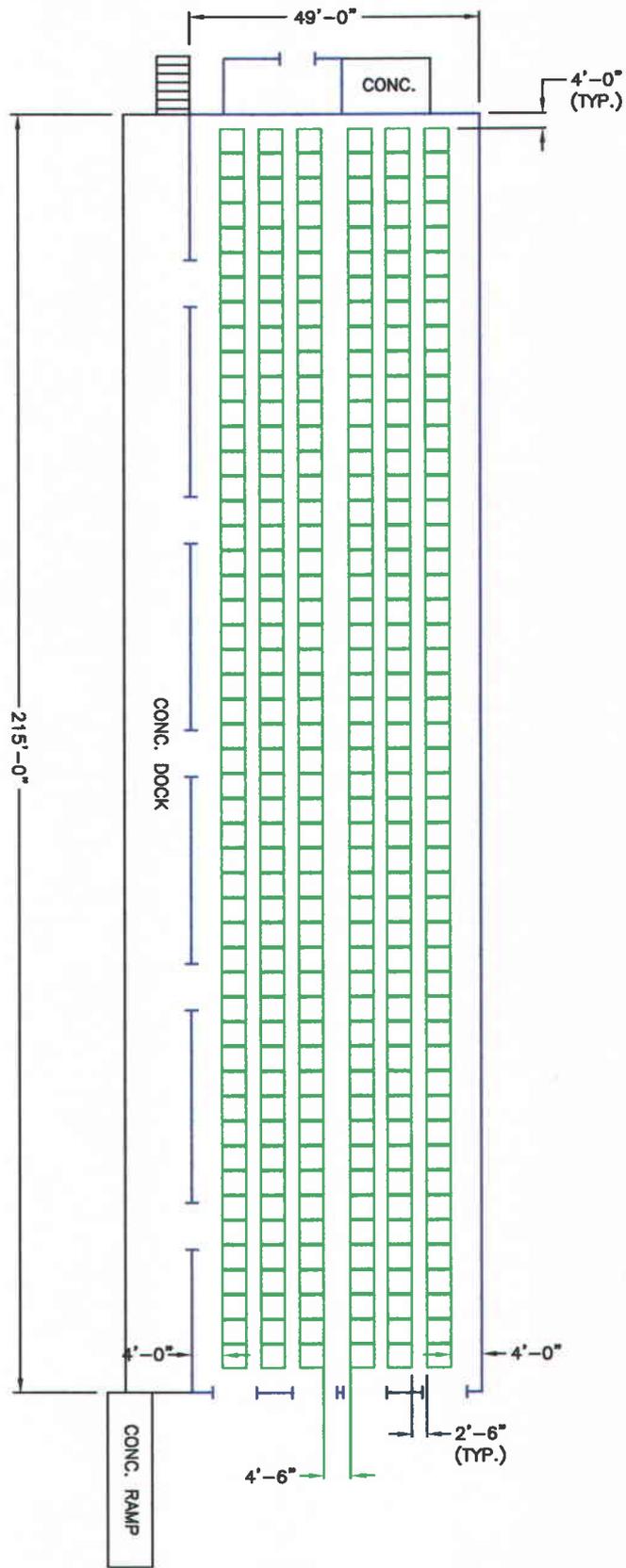


FIGURE A-5
ABOVE GROUND SERVICE MAGAZINE 1205
CONTAINER STORAGE CONFIGURATION

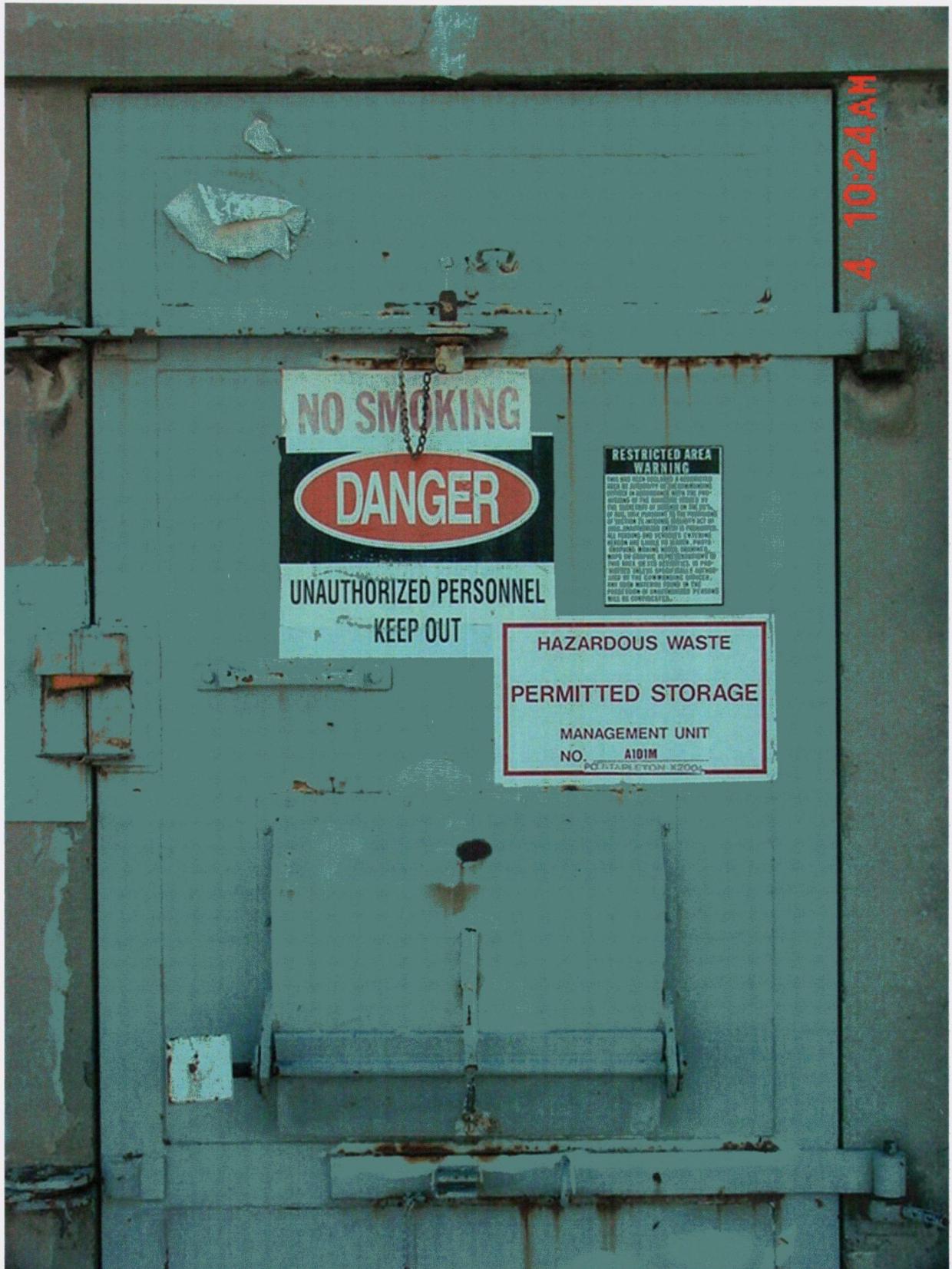
Appendix B
Photographs of Storage Buildings



Above Ground Magazine1205



Bldg 528



Igloo A-101



Igloo C-815



Igloo C-816



Service Magazine 1368



Service Magazine 1370