REPORT OF RCRA COMPLIANCE EVALUATION INSPECTION

At

McConnell Air Force Base
57830 Pittsburg Street, Suite 120
McConnell AFB, KS 67221
316-759-5345

EPA Identification Number: KS1571924140

On

August 20, 23, and 24, 2021

By

U.S. ENVIRONMENTAL PROTECTION AGENCY
Region 7
Enforcement & Compliance Assurance Division

1.0 INTRODUCTION

I performed a Resource Conservation and Recovery Act (RCRA) compliance evaluation inspection (CEI) remote virtual and a visual inspection at McConnell Air Force Base (MAFB), located in Wichita, Kansas, on August 20, 23, and 24, 2021. I conducted the inspection under the authority of RCRA Section 3007(a), as amended. During the inspection, I collected the information necessary to determine compliance with the applicable regulatory and statutory requirements. This report and attachments present the results of the inspection. Based on the information obtained during the inspection, I inspected the facility as a State of Kansas and Federal Large Quantity Generator (LQG) of hazardous waste, generator of universal waste lamps and batteries, and used oil generator. MAFB was last inspected by the Kansas Department of Health and Environment (KDHE) on June 2-4, 2015. Five violations were observed or cited as a result of the 2015 inspection.

2.0 PARTICIPANTS

MAFB:

Doug Wheeler, Regional Environmental/Hazardous Waste Manager
Lieutenant Colonel Jon Needham, Commander (exit briefing only)
Kristi Draney, Chief Environmental (exit briefing only)
Diana Gilchrist, Installation Management Flight Chief (exit briefing only)
David Pettus, Environmental Engineer
William Fisher, Sergeant (Building 1124 inspection)
Adam Steinman, Sergeant (Building 1124 inspection)

Katie Hundley, Outdoor Recreation Mechanic (Building 1349 inspection)

Kansas Department of Health and Environment (KDHE)
Amy Wooten, Bureau of Environmental Field Services (BEFS)

U.S. Environmental Protection Agency (EPA):
Timothy Evans, Life Scientist, ECAD

3.0 INSPECTION PROCEDURES

On August 20, 2021, at approximately 1:00 p.m., I used Microsoft (MS) Teams to call MAFB and left a message for Mr. Wheeler. At approximately 1:30 p.m. I then used MS Teams again to call and speak with Mr. Pettus. I introduced myself and explained the purpose of my call. I informed Mr. Pettus that I intended to conduct a RCRA inspection at MAFB on Monday August 23, 2021. Mr. Pettus stated that he would contact Mr. Wheeler and have him call me. Mr. Wheeler returned my phone call at approximately 1:45 p.m. I introduced myself and explained the purpose of my call. I informed Mr. Wheeler that I intended to conduct a RCRA inspection at MAFB on Monday August 23, 2021. Mr. Wheeler and I established a date and time for an on-site inspection starting at 9:30 a.m. on August 23, 2021. I asked Mr. Wheeler if he had time to discuss inspection documents that I routinely provide at the time of an inspection opening conference. Mr. Wheeler stated that he had time to discuss the documents, which I provided to him through e-mail. I used MS Teams to discuss inspection documents with Mr. Wheeler. The following opening conference documents were discussed: pre-inspection COVID-19 related questions, a site info verification report, 2019 Biennial Report, and a copy of the RCRA Facility Access Information Sheet (March 2013), which describes the EPA's inspection authority. I also explained my need to collect accurate information and provided Mr. Wheeler with a copy of Title 18 U.S. Code, Sections 1001 and 1002.

On August 23, 2021, I arrived at MAFB at 9:30 a.m. A drive-by inspection was only possible on the east perimeter of the facility. No apparent issues were observed. I then proceeded to the MAFB visitors center and met Ms. Wooten. Ms. Wooten accompanied me as an observer. I called Mr. Wheeler and informed him that Ms. Wooten and I were at the visitor's center. We met Mr. Wheeler and I presented him with my business card and EPA credentials. After checking in and receiving visitor passes to enter the base, Mr. Wheeler escorted Ms. Wooten and me to a conference room within Building 948 for the in briefing. As part of the in-briefing, Mr. Wheeler was made aware of MAFB's confidentiality rights and informed that a Confidentiality Notice would be provided at the end of the inspection to make, or not to make, any claims. Mr. Wheeler acted as the facility representative during the on-site inspection activities.

As part of the in briefing, Mr. Pettus briefed us regarding a release of jet fuel A that had occurred on the morning of August 21, 2021. See Section 4.5 for additional details regarding the release of jet fuel.

During the inspection, discussions consisted of wastes generated and waste management practices.

On August 23, 2021, I conducted a visual inspection of the Building 1098, scale bay, Bay 1, Bay 2, and Building 1096 less than 90-day hazardous waste accumulation area; Building 1349/Outdoor Recreation; Building 1183-AFE, including the flight line and flotation rooms; Building 1169; Building 1171/Air Ground Equipment, including the parts washer, bead blast booth, and battery locker room; Building 1107/AMXS, CTK/tool crib; Building 1170/Non-Destructive Inspection, including the wheel and tire shop.

On August 24, 2021, Ms. Wooten and I met at the MAFB visitors center at approximately 8:30 a.m. I called Mr. Wheeler and informed him that Ms. Wooten and I were at the visitor's center. We met Mr. Wheeler and continued conducting a visual inspection at the following locations: Building 1124, including paint storage, staging area, sanding room, blasting room, and composite room; Building 952, including outside used oil storage tank; Parking Apron A2 – origin/location of failed fuel hydrant gasket/release of jet fuel; Building 970/East Hydrants Pump House.

Information collected during the inspection was documented in a bound notebook, on the KDHE Hazardous Waste Generator Requirements checklist (Attachment 1), and as discussed below.

Although I had not completed a review of facility records, I was asked to summarize the findings and recommendations on August 24, 2021 at approximately 2:00 p.m. The summary of findings and recommendations was requested by MAFB personnel to accommodate exit briefing participants' work schedules. I provided Ms. Draney with a Confidentiality Notice (Attachment 2) which she signed as acknowledgement of receipt. Ms. Draney made no confidentiality claims. I provided Mr. Wheeler with a Receipt for Documents and Samples (Attachment 3) and Notice of Preliminary Findings (NOPF) (Attachment 4), which Mr. Wheeler signed as acknowledgement of receipt.

The following inspection documents were provided to MAFB:

Inspection Documents
Confidentiality Notice
Notice Regarding Proprietary/Confidential Business Information Submitted to or Collected by EPA In Connection with Inspections
Receipt of Documents and Samples
Notice of Preliminary Findings
Instructions for Responding to a Notice of Preliminary Findings

KDHE Compliance Assistance Handouts (provided by Ms. Wooten on August 24, 2021)
Solvent-Contaminated Wipes (HW-1995-G2)

I followed the inspection procedures discussed in the RCRA CEI Standard Operating Procedure (No. 2321.1D), unless noted differently. Any federal regulatory citations noted in this report are as adopted by reference in the authorized Kansas regulations.

4.0 FINDINGS AND OBSERVATIONS

4.1 General Information/Facility Description/RCRA Status

MAFB is a United States Air Force base located four miles southeast of the central business district of Wichita, Kansas in Sedgwick County. MAFB began operating in 1924 with the Kansas Air National Guard (KANG) activated in 1941. It is the home of Air Mobility Command's 22d Air Refueling Wing (22 ARW), Air Force Reserve Command's 931st Air Refueling Wing (931 ARW), and the Kansas Air National Guard's 184th Intelligence Wing (184 IW). McConnell's primary mission is to provide global reach by conducting air refueling and airlift where and when needed.

The site consists of approximately 1,440 acres and multiple buildings. Refer to Attachment 5 for the facility site map. Both MAFB and KANG utilize the same EPA Identification number. Shipments of hazardous waste generated by both units are manifested and shipped together. A majority of the wastes generated are managed through Clean Earth, located in Calvert City, Kentucky (formerly, American Environmental Services). See Attachment 7 for additional information related to waste streams.

Satellite Accumulation Areas, referred to as Satellite Accumulation Points (SAPs) by MAFB, and universal waste accumulation points (UWAPs) were inspected in multiple buildings throughout MAFB. SAPs may include multiple waste streams, and several buildings contained multiple SAPs. The less than 90-Day hazardous waste central accumulation area is located in Building 1098. MAFB operates seven days each week, 24 hours each day.

RCRA Status

According to the RCRAInfo database, MAFB has notified as a State of Kansas and Federal Large Quantity Generator of hazardous waste. As part of the opening conference documents e-mailed to MAFB, I provided Mr. Wheeler with a Hazardous Waste Site Info Verification Report for Inspector form (Attachment 6). Mr. Wheeler and I reviewed the form during the virtual in briefing on August 20, 2021. Mr. Wheeler made no changes to the form. Based upon the amount and type of hazardous waste generated at MAFB, I inspected the facility as a State of Kansas and Federal Large Quantity Generator of hazardous waste, small quantity handler of universal waste, and used oil generator.

4.2 Changes Since Previous Inspection

Doug Wheeler became the new Regional Environmental/Hazardous Waste Manager in July 2015.

The facility completed construction of the new less than 90-day hazardous waste accumulation area in Building 1098 in February 2020.

4.3 Waste Streams and Waste Management

Information related to waste streams is listed in the Waste Stream Table and the inventory of waste located in the Building 1098 less than 90-day accumulation area (Attachment 7).

4.4 Areas Visually Inspected and Related Violations/Issues

4.4.1 Building 1096, Scale Bay

Hazardous Waste Not Containerized, 40 CFR 262.34(a)(1)(i) (NOPF 1) – During inspection of the Building 1096 Scale Bay, I observed what appeared to be paint on the floor, on an aerosol can crusher, and on a curtain behind a can crusher (Photos 1-3). An aerosol can puncturing device, attached to a 55-gallon hazardous waste satellite accumulation area (SAA) container, was located next to the can crusher. Mr. Wheeler confirmed that the material observed on the floor, can crusher, and curtain was material that originated from punctured aerosol cans.

Spent aerosol cans, generated throughout MAFB, are managed as D001, D035, F003, and F005 hazardous waste. Aerosol cans are accumulated using multiple SAA containers throughout multiple buildings at MAFB. Aerosol cans are brought to Building 1096 to be punctured. The amount of aerosol can residual on the floor, can crusher, and curtain was not determined at the time of the inspection.

4.4.2 Building 1098 - Less Than 90-Day Accumulation Area

Hazardous Waste Containers Not Marked with an Accumulation Start Date, 40 CFR 262.34(a)(2) (NOPF 2) – During inspection of the permitted less than 90-day accumulation area, I observed the following containers either not labeled with an accumulation start date or labeled with an incorrect accumulation start date:

- One black metal 55-gallon drum not marked with an accumulation start date (Photos 4 and 5)
- One blue polyethylene 55-gallon drum labeled with an incorrect accumulation start date, "2/5/21" (Photos 7 and 8)

Using the "McConnell AFB Waste Tracking Log", Mr. Wheeler was able to determine and mark the correct accumulation start dates on each container, addressing NOPF 1 at the time of the inspection (Photos 6 and 9-11).

4.4.3 Building 1349/Outdoor Recreation

Hazardous Waste SAA Containers Not Marked with the Words "Hazardous Waste", K.A.R. 28-31-262(c)(7) (NOV 3) - During inspection of Building 1349, Outdoor Recreation, I observed one 5-gallon step can labelled with the words "Non-Regulated Waste", "Oily Rags" (Photo 12). I asked Ms. Hundley if any solvents or chemicals might be on the cloth rags. Ms. Hundley stated that Berryman B-12 Chemtool Fuel System Cleaner is used on a small number of cloth rags as part of cleaning and maintaining equipment.

I asked Ms. Hundley for a copy of the Berryman B-12 Safety Data Sheet (SDS). According to the SDS, Berryman B-12 contains 40-50% toluene; 20-25% acetone; 20-25% methanol; 1-5% methyl ethyl ketone; and small amounts of 2-Butoxyethanol and 2-propanol (Attachment 8). Therefore, any cloth rags used along with the Berryman B-12 would be considered an F005 hazardous waste.

This was inadvertently cited as "Not Complying with Management Requirements for Solvent-Contaminated Wipes, 40 CFR 261.4(a)(26)" on the NOPF left with MAFB. Since MAFB was not complying with State of Kansas policy, which allows management of solvent-contaminated wipes under the exclusion, the wipes would have needed to be managed as hazardous waste at the time of the inspection. Therefore, the step can in Photo 12 would have also needed to be labelled with the words "Hazardous Waste".

In the event that MAFB chooses to manage solvent-contaminated wipes as excluded solvent-contaminated wipes, Ms. Wooten provided Mr. Wheeler with technical guidance document, "Solvent-Contaminated Wipes (HW-1995-G2)", which outlines how to comply with the policy.

I recommended to Mr. Wheeler that he double check with other personnel throughout MAFB to ensure cloth rags are being managed according to regulations.

4.4.4 Building 1124, Sanding and Blasting Rooms

Hazardous Waste SAA Containers Not Marked with the Words "Hazardous Waste", K.A.R. 28-31-262(c)(7) (NOPF 4 Added After Inspection) – During inspection of the Building 1124 sanding and blasting rooms, I observed two HEPA vacuums, in each room (Photos 13 and 14). I asked Sergeants Fisher and Steinman, who were accompanying us in Building 1124, how the HEPA vacuums were used within each of the rooms. Sergeants Fisher and Steinman stated that the HEPA vacuums were used to clean up hazardous waste chromium-contaminated paint and bead blast dust off the floors, in the respective rooms. The HEPA vacuums were not marked with the words "Hazardous Waste".

According to Sergeants Fisher and Steinman, after they become full, bags within the HEPA vacuums are removed and placed in a 55-gallon hazardous waste SAA container, located approximately 15 feet away from the HEPA vacuums, in each room. I explained to Mr. Wheeler that State of Kansas regulation K.A.R. 28-31-262(c)(6), states that not more than one satellite accumulation container, of the same waste stream, is allowed at or near the point of generation. Furthermore, 40 CFR 262.34(c)(2) requires that the 55-gallon hazardous waste SAA containers, located in each room with the HEPA vacuums, would need to be managed as storage containers, since they are receiving the same type of waste from the SAA HEPA vacuums. The regulations prohibit transferring the same type of waste from one SAA container to another SAA container, unless one of the containers is a day use container. During the inspection, I asked Sergeants Fisher and Steinman if the bags were emptied at the end of the day or after every time they were used, which would allow them to meet the definition of a day use container. According to Sergeants Fisher and Steinman, the HEPA vacuum bags are only removed when they are full, which varies based upon the amount work performed in the sanding and blasting rooms.

For assistance in determining the best way to comply with container management regulations in the sanding and blasting rooms, I recommended to Mr. Wheeler that he contact Brian Burbeck, KDHE Bureau of Waste Management, at (785) 296-1613 or Brian.Burbeck@ks.gov.

According to Sergeants Fisher and Steinman, MAFB began using HEPA vacuums in the sanding and blasting rooms as a result of an Occupational Safety and Health Administration (OSHA) inspection. Sergeants Fisher and Steinman stated that the HEPA vacuums are being used to address deficiencies found as part of the OSHA inspection, specifically related to controlling and containing chromium-contaminated paint and bead blast dust.

An e-mail was sent to the facility on September 21, 2021, informing the facility of the additional citation (Attachment 9).

4.4.5 Record Review

90-Day Weekly Inspection Checklist Missing Time of Inspection, 40 CFR 265.15(d) (NOPF 5 Added After Inspection) – According to, 40 CFR 265.15(d), container inspection documentation must include complete date and time of inspection, name of inspector, notations of observations, and date and nature of any remedial actions. During review of weekly inspection checklists, Ms. Wooten noted that the time was not documented on 10 checklists (Attachment 10).

Ms. Wooten also noted that container conditions and safety concerns were marked as "Unacceptable" on the April 30, 2021 weekly inspection checklist (Attachment 11). When asked about the "Unacceptable" conditions marked on the checklist, Mr. Wheeler indicated that the inspector, Kent Frame, must have inadvertently marked the wrong column, which should have been applied to the "Acceptable" column for containers located in the West Bay.

Ms. Wooten reviewed weekly inspection records dated January 2018 through August 2021.

An e-mail was sent to the facility on September 21, 2021, informing the facility of the additional citation (Attachment 9).

Manifests and Shipping Documents
Prior to arriving at the facility, I had conducted an on-line inspection of electronic manifests using RCRAInfo. I verified manifests were retained for at least three years. All manifests appeared to be complete, signed by the designated facility, and were accompanied by land disposal restriction (LDR) notification forms.

No apparent issues were observed during review of manifests, bill of lading, and LDR notification forms.

2019 Comprehensive Biennial Report
Prior to arriving at the facility, I was able to review the facility 2019 biennial report using RCRAInfo.

No apparent issues were observed during review of the 2019 comprehensive biennial report.

Contingency Plan Not Maintained/Available for Review at Time of Inspection, 40 CFR 265.53(a) (NOPF 6 Added After Inspection) – During review of documents, I asked Mr. Wheeler for a copy of the facility contingency plan. Mr. Wheeler provided me with a document entitled "U.S. Air Force", "Hazardous Waste Management Plan" (HWMP).

Mr. Pettus also provided me with the August 2019 Facility Response Plan (FRP). In Section 7.10, Preparedness and Prevention, the HWMP references, but does not include, a "HW Contingency Plan". The FRP does describe actions that facility personnel must take in response to a release and routes for evacuation. However, the FRP did not include any other RCRA specific contingency plan requirements.

At the time of the inspection, I provided Mr. Wheeler with a copy of the 2015 State of Kansas RCRA inspection report. The 2015 inspection report included specific contingency plan requirements in the form of a checklist. Subsequent to the inspection, during a phone conversation on September 17, 2021, I asked Mr. Wheeler if he was able to locate the facility contingency plan, which would include those specific requirements listed in the 2015 inspection report. Mr. Wheeler stated that he was able to find the facility contingency plan, however MAFB deemed the plan as confidential, and therefore would not be able to provide the plan to me.

An e-mail was sent to the facility on September 21, 2021, informing the facility of the additional citation (Attachment 9).

Personnel Training
I reviewed the facility job title and written job descriptions for Mr. Wheeler and Alan Beat who are involved with hazardous waste handling and management. Messrs. Wheeler and Beat both instruct in-house RCRA training at MAFB.

A combination of in-house and online training is provided to hazardous waste managers and all shop personnel, and their immediate supervisors, who generate hazardous waste. According to the HWMP, "all training requirements and sources are provided in the Environmental Training Matrix on eDASH" and records of training are kept in the Recordkeeping and Reporting section of the HWMP.

During the inspection, Mr. Wheeler provided me with a training attendance sheet which listed ten names of MAFB personnel. The training was conducted on October 29, 2019. The sign-in sheet did not include topics covered. However, Mr. Wheeler provided me with a printout of a PowerPoint presentation entitled "Hazardous Waste Management Training". Topics within the PowerPoint include introduction to RCRA; characteristic waste; listed waste; universal waste; container management; waste manifesting and transportation; emergency procedures, prevention, and safety; and record keeping and reporting. It should be noted that the training did not include training on when, how, or why a contingency plan would be used/implemented.

No apparent issues were observed during review of training records.

Emergency Equipment Testing and Inspection
During the inspection, I noted ABC-rated fire extinguishers throughout the facility had been inspected in 2021.

According to Mr. Wheeler, MAFB Civil Engineering maintains and services, or is a point of contact, regarding sprinkler systems throughout the base and in Building 1098.

No apparent issues were observed during review of emergency equipment testing and inspection records.

4.5 Additional RCRA Related Information

Release of Jet Fuel A – Parking Apron A2
On the morning of August 21, 2021, MAFB responded to a release of jet fuel A, near parking apron A2. According to Mr. Pettus, a fuel hydrant gasket failed, releasing approximately 2,700 gallons of jet fuel A. Mr. Pettus stated that the MAFB Fire Department and Petroleum, Oil, and Lubricant personnel (part of Logistics Readiness Squadron) responded to the spill. According to Mr. Pettus, approximately 1,100 gallons of jet fuel A was recovered from/pumped out of the hydrant fueling pit; approximately 1,300 gallons was recovered, and partially evaporated, from the parking apron; and approximately 300 gallons remained in the parking apron storm drain. The parking apron storm drain is approximately 1/2 mile long and drains to the south; the release flowed to the south and west part of the parking apron. An approximately 150-yard-long cement lined culvert is connected to the south end of the parking apron storm drain. At the end of the cement lined culvert is an oil water separator.

I asked Mr. Pettus if any of the jet fuel A flowed to the cement culvert or to the oil water separator. Mr. Pettus stated that when he last checked there was no sheen on the water in the oil water separator and it did not appear that jet fuel had made it into the cement culvert. I asked Mr. Pettus how the fuel is removed from the parking apron storm drain. Mr. Pettus stated that it would be difficult to remove the jet fuel from the storm drain since most of the metal grates covering the drain are not able to be removed.

MAFB personnel used absorbent socks on the parking apron to contain and collect the released jet fuel A. I asked Mr. Pettus where the jet fuel-contaminated absorbent socks were being stored. Mr. Pettus stated that jet fuel-contaminated absorbent socks were being accumulated in 55-gallon drums within Building 970, the East Hydrants Pump House. During inspection of Building 970, I observed seven full 55-gallon drums containing jet fuel A-contaminated absorbent socks. The drums were closed, labelled with the words “Hazardous Waste”, and marked with accumulation start dates and waste codes D001 and D018 (Photo 15). MAFB personnel were using a press, or wringer, to squeeze jet fuel out of absorbent socks. According to MAFB personnel, jet fuel could then be run through a filtration system and reclaimed and used for its intended purpose.

Satellite Accumulation Containers Located in Building 1096, Bay 1
During inspection of Building 1096, Bay 1, I observed 10 various sized SAA containers of different hazardous wastes.

I asked Mr. Wheeler where all the wastes in the containers were being generated. Mr. Wheeler stated that the wastes within the SAA containers were generated throughout MAFB. I asked Mr. Wheeler what the points of generation would be for the hazardous wastes within the containers. Mr. Wheeler stated that the Hazardous Waste Program is contacted by MAFB personnel when they need unwanted or waste material picked up. After being picked up by the Hazardous Waste Program, that material is taken to Building 1096 where a waste determination is conducted. I asked Mr. Wheeler if MAFB personnel were making waste determinations for the material, prior to it being picked up by the Hazardous Waste Program. Mr. Wheeler stated that a waste determination is conducted for the material after it is brought back to Building 1096.

I also noticed, associated with the 10 SAA containers, that D002 caustic/corrosive wastes were being stored next to or near D001 and F003 ignitable hazardous wastes. According to Mr. Wheeler, there are containers within the SAA containers acting as secondary containment. I suggested to Mr. Wheeler to make sure that incompatible wastes were not being stored next to each other.

Extension to Store Hazardous Waste Over 90 Days
According to Mr. Wheeler, MAFB was given an extension to store waste over 90 days by KDHE. According to the Generator Incident Form (GIF) and other supporting documentation, treatment storage, disposal (TSD) facility, Clean Earth of Calvert City, returned hazardous waste to MAFB on June 11, 2021. According to the GIF, the TSD could not receive or process the waste due to operator issues/limitations at the TSD (Attachment 12).

5.0 SUMMARY

I inspected MAFB as a Federal and State of Kansas Large Quantity Generator of hazardous waste, small quantity handler of universal waste, and used oil generator.

Hazardous waste requirements reviewed during this inspection are discussed above and are noted on the KDHE Hazardous Waste Generator Requirements checklist included as Attachment 1.

The following preliminary findings/issues were noted as discussed above:

1. Hazardous Waste Not Containerized, 40 CFR 262.34(a)(1)(i) (NOPF 1).
2. Hazardous Waste Containers Not Marked with an Accumulation Start Date, 40 CFR 262.34(a)(2) (NOPF 2).
3. Hazardous Waste SAA Containers Not Marked with the Words "Hazardous Waste", K.A.R. 28-31-262(c)(7) (NOPF 3). **Inadvertently cited on NOPF as Failure to Comply with Management Requirements for Solvent-Contaminated Wipes, 40 CFR 261.4(a)(26)**.
4. Hazardous Waste SAA Containers Not Marked with the Words "Hazardous Waste", K.A.R. 28-31-262(c)(7) (NOPF Added After Inspection).
5. 90-Day Weekly Inspection Checklist Missing Time of Inspection, 40 CFR 265.15(d) (NOPF Added After Inspection).
6. Contingency Plan Not Maintained/Available for Review at Time of Inspection, 40 CFR 265.53(a) (NOPF Added After Inspection).

Other than the items noted above, no other apparent preliminary findings were observed or cited. However, EPA post-inspection review of this report may change or add to my findings.

Evans, Tim Digitally signed by Evans, Tim Date: 2021.10.01 16:32:19 -05'00'

Timothy R. Evans
Life Scientist
ECAD/CB/RCRA, EPA Region 7

AMBER WHISNANT Digitally signed by AMBER WHISNANT Date: 2021.10.05 18:39:14 -05'00'

Amber Whisnant
Section Chief
ECAD/CB/RCRA, EPA Region 7

Attachments

1. KDHE Hazardous Waste Generator Requirements Checklist (17 pages)
2. Confidentiality Notice (1 page)
3. Document of Receipt (1 page)
4. NOPF (1 page)
5. Facility Map (1 page)
6. Hazardous Waste Site Info Verification Report for Inspector (2 pages)
7. Waste Stream Table and Weekly Container Report (16 pages)
8. Berryman B-12 Chemtool Fuel System Cleaner SDS (10 pages)
9. September 21, 2021 E-mail to Facility - Additional NOPFs (3 pages)
10. Weekly Inspection Checklists – Missing Time of Inspection (10 pages)
11. Weekly Inspection Checklists – Inadvertently Marked Wrong Column (1 page)
12. Generator Incident Form and Other Supporting Documentation (17 pages)

Photo Log (2 pages)
Photos (8 pages/15 photos)

Notice of Preliminary Findings

Media: RCRA

Facility Name: McCONNELL AIR FORCE BASE

Facility Address: 57830 PITTSBURG STREET, SUITE 120
McCONNELL AFB, KANSAS 67221

EPA ID#: KS 1571924140 **Date:** 8.23-24.21

This notice is provided to call your attention to the following preliminary findings regarding state and federal regulations. This notice does not constitute a compliance order and may not be a complete listing of all findings resulting from the inspection.

Citation	Description of Finding
1. 40 CFR 262.34(a)(1)(i)	HAZARDOUS WASTE NOT CONTAINERIZED BLDG. 1096, SCALE BAY - AEROSOL CAN PUNCTURING DEVICE HW
*2. 40 CFR 262.34(a)(2)	ACCUMULATION START DATE NOT MARKED ON TWO HW STORAGE CONTAINERS - NEW, LESS THAN 90 DAY STORAGE AREA
3. 40 CFR 261.4(a)(26)	NOT COMPLYING WITH MANAGEMENT REQUIREMENTS FOR SOLVENT-CONT. WIPES

*CORRECTED AT TIME OF INSPECTION

As a continuation of the inspection performed at your facility, you are asked to submit a written response within 14 calendar days of receipt of this notice. Your response should include a description of all corrective actions taken and/or a schedule for completing the necessary corrective actions. The response should be submitted to:

U.S. Environmental Protection Agency
Region 7, Enforcement & Compliance Assurance Division (ECAD)
11201 Renner Boulevard, Lenexa, KS 66219
ATTN: TIMOTHY R. EVANS

If you have any questions about this Notice or wish to discuss your response, you may call me at (913)551-7663, or EDWIN BUCKNER (Compliance Officer) at (913)551-7621.

This Notice prepared by Timothy R. Evans Date: 8.24.21

The undersigned person herby acknowledges that he/she has received a copy of this Notice and has read same.

Printed Name: Douglas D Wheeler
Signature: [signature]
Title: Hazardous Waste Program Manager
Date: 8-24-2021

(Rev: 2/25/2020) White Original/ EPA •Yellow/ Facility

Instructions for Responding to a Notice of Preliminary Findings (NOPF)

Note: The instructions below are being provided to assist you if you choose to submit a written response to the preliminary findings identified in the EPA's NOPF. This is an opportunity for you to provide to the EPA any and all information that you believe is relevant to these preliminary findings and your efforts to return to compliance with the regulatory requirements. The EPA will consider information submitted by you in determining our enforcement response to the preliminary findings identified at your facility, but please be advised that any information you submit may be used in a subsequent enforcement action.

1. Identify the person(s) responding to the NOPF authorized to make statements for the facility, including the person's name, title, and telephone numbers, if different from the facility's telephone number. For each numbered preliminary finding, identify all persons consulted in the preparation of the answer.
2. Your answers should address and reference each numbered preliminary finding separately.
3. Each of your answers should identify all documents consulted, examined, or referred to in the preparation of the response, or that contain information responsive to the preliminary finding. Please provide legible copies of all such documents. For each document provided, indicate on the document (or in some similar manner) the number of the preliminary finding to which it responds.
4. Describe all actions taken by you to correct the preliminary findings identified in the NOPF and/or a schedule for completing the necessary corrective actions for each numbered preliminary finding. If the preliminary finding has been corrected, please provide the date the preliminary finding was corrected.
5. Your responses should include documentation, photographs, drawings, etc. of corrected preliminary findings where applicable (for example, photographs of properly labeled containers). The information submitted should indicate the number of the preliminary finding to which it corresponds.
6. If information responsive to a preliminary finding is not in your possession, identify the person(s) from whom the information may be obtained.
7. If different or new procedures are put in place to prevent the same or similar preliminary findings, provide a description of those procedures.
8. If you want to make a confidentiality claim pursuant to 40 C.F.R. Part 2, Subpart B covering part or all of the information submitted, identify the material with words such as "trade secret," "proprietary," or "company confidential." Refer to the Confidentiality Notice provided to you at the time of the inspection.
9. If you choose to respond, and plan to submit your response after 14 calendar days, please discuss your plans with the compliance officer noted on the NOPF.

RCRA Inspected Facilities:

If your facility was cited for hazardous waste determination preliminary findings, provide the following information for each waste stream and/or each waste unit listed:

a. specify the waste name;

b. indicate whether the waste is hazardous, non-hazardous, used oil, universal waste, or exempt from regulation (if you claim the waste is exempt from regulation, include the regulatory reference that you believe is applicable to the exemption for the waste);

c. state whether process knowledge or analytical testing was used to make the determination (attach all supporting documentation, i.e., the specific documents (e.g., Safety Data Sheets) used as process knowledge);

d. if the waste is a hazardous waste, list all applicable RCRA waste code(s) and the hazardous properties (Ignitable, Reactive, Corrosive, Toxic);

e. if the waste is a hazardous waste, used oil, or universal waste,

   i. indicate the quantity or monthly generation rate of this waste at your facility;

   ii. indicate the length of time the waste has been generated at your facility, and how long the waste has been stored at your facility;

   iii. state how you plan to handle or manage the waste at your facility;

   iv. if applicable, describe your facility' s plans for disposing the waste (attach all supporting documentation, e.g., any shipping documents or arrangements made for shipping documents); and,

f. if the waste is non-hazardous or if you believe it is exempt from regulation, provide information on how it will be disposed, recycled, or used, and where these activities will occur.