

RCRA Inspection Report

1) Inspector and Author of Report

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Enforcement and Compliance Assurance Division
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2) Facility Information

Naval Submarine Base - Kings Bay
1063 USS Tennessee Avenue
Kings Bay, GA 31547

EPA ID#: GA4170090001
NAICS #: 28110 – National Security

3) Responsible Officials

(b) (6)
Commanding Officer
(b) (6).mil@us.navy.mil

4) Inspection Participants

(b) (6), Naval Submarine Base Kings Bay
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(b) (6), Jacobs Support Services
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(b) (6), Georgia Environmental Protection Division (GAEPD)
(b) (6), GAEPD
Kayla Acosta, U.S. Environmental Protection Agency (EPA)

5) Date of Inspection

February 27, 2024, at 7:00 A.M. to 4:30 P.M.

February 28, 2024, at 7:00 A.M. to 5:45 P.M.

February 29, 2024, at 7:00 A.M. to 9:00 A.M.

6) Applicable Regulations¹

Resource Conservation and Recovery Act (RCRA) Sections 3002 (42 U.S. Code – Annotated U.S.C.A. 6925 and 6927), and 40 Code of Federal Regulation (C.F.R.) Parts 260 - 270, 273, 278, & 279; and Hazardous Waste Permit No. HW-014(S&T)-4.

¹ As the State's authorized hazardous waste program operates in lieu of the federal RCRA program, the citations of those authorized provisions will be to the authorized State program. However, for ease of reference, the federal citations will follow in brackets.

Georgia Hazardous Waste Management Act, Ga. Code Ann. § 12-8-60 *et seq.*, and Georgia Hazardous Waste Management Rules, Ga. Comp. R. and Regs. 391-3-11.01 to 391-3-11.18 (2016 and 2018)

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.02(1) [40 C.F.R. § 260.10], a large quantity generator of hazardous waste (LQG) is a generator who generates greater than or equal to 1,000 kilograms (2,200 pounds) of non-acute hazardous waste in a calendar month.

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.15(a)], a generator may accumulate as much as 55 gallons of non-acute hazardous waste 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 without having interim status, as required by Section 12-8-66 of the GHWMA, Ga. Code Ann. § 12-8-66 [Section 3005 of RCRA, 42 U.S.C. § 6925], and without complying with Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.16(b) or § 262.17(a)], except as required in Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.15(a)(7) and (8)], provided that the generator complies with the satellite accumulation area conditions listed in Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.15(a)] (hereinafter referred to as the “SAA Permit Exemption”).

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.17], an LQG may accumulate hazardous waste on-site for 90 days or less without a permit or without having interim status, as required by Section 12-8-66 of the GHWMA, Ga. Code Ann. § 12-8-66 [Section 3005 of RCRA, 42 U.S.C. § 6925], provided that the generator complies with the conditions listed in Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.17] (hereinafter referred to as the “LQG Permit Exemption”).

7) Purpose of Inspection

The purpose of this inspection was to conduct an unannounced compliance evaluation inspection to determine Naval Submarine Base - Kings Bay’s compliance with the conditions of its RCRA Hazardous Waste Facility Operating Permit No. HW-014(S&T)-4, the applicable requirements of RCRA and the corresponding Georgia regulations. This was an EPA lead inspection.

8) Facility Description

Naval Submarine Base Kings Bay (known hereinafter as “Kings Bay” or “the facility”) is a base of the United States Navy located in Camden County, Georgia. The Submarine Base is the U.S. Atlantic Fleet's home port for U.S. Navy Fleet ballistic missile nuclear submarines. Kings Bay operates three major commands: Trident Training Facility (TTF), Trident Refit Facility (TRF) and Strategic Weapons Facility, Atlantic (SWFLANT). Kings Bay is also a homeport for the U.S. Coast Guard. The facility also performs contract maintenance for naval surface ships and other non-U.S. submarines.

The base covers approximately 16,000 acres of land; of which 14,000 acres are undeveloped wetlands. The base is guarded 24 hours a day, 7 days a week, with two main security gates.

There can be upwards of approximately 5,000 people on base and 2,500 military base employees during the core hours of 05:00 AM and 6:00 PM.

Kings Bay first submitted notification of its regulated waste activities on April 03, 1990, as a LQG of Hazardous Waste by submitting a biennial report. Kings Bay most recently notified as a LQG and treatment, storage, and disposal facility (TSDF) on February 23, 2022. The facility has submitted its 2023 biennial report to GAEPD and is currently under review. Wastes generated at the facility are a result of maintenance operations conducted on the submarines and associated equipment, military training exercises, facility maintenance, medical and veterinary facility operations, and permitted open burning and open detonation (OB/OD) operations. The facility generates hazardous waste with the following EPA waste codes:

D-Codes:
D001 D002 D003 D004 D005 D006 D007 D008 D009 D010 D011 D017 D018 D019 D021 D022 D026 D027 D035 D038 D039 D040 D043
F-Codes:
F001 F002 F003 F005
P-Codes:
P001 P006 P012 P042 P044 P081 P098 P105 P120
U-Codes:
U002 U019 U028 U037 U044 U057 U080 U112 U121 U122 U133 U154 U159 U160 U211 U213 U220 U223 U239 U248 U359

The facility was issued a Hazardous Waste Facility Permit No. HW-014(S&T)-4 from GAEPD for the following activities:

- Storage of 59,840 gallons of hazardous waste in containers;
- Treatment of 0.5 short tons Net Explosive Weight per day of waste munitions and explosives by open burning;
- Treatment of 0.6 short tons Net Explosive Weight per day of waste munitions and explosives by open detonation;
- Investigation and corrective action (if necessary) of Solid Waste Management Units and Areas of Concern; and
- Corrective Action of contaminated groundwater at the Old Camden County Landfall (Site 11).

The permit termination date was September 28, 2022; however, the facility is currently working with GAEPD to renew their permit and will continue to operate under the existing permit until the new one is issued.

9) **Previous Inspection History**

GAEPD has conducted three RCRA CEIs at the subject facility between 2019 and 2023 and found no violations during those inspections.

10) **Opening Conference**

On February 27, 2024, EPA inspector Kayla Acosta, accompanied by GAEPD inspectors (b) (6) and (b) (6), arrived at U.S. Naval Submarine Base Kings Bay at approximately 7:00 A.M. After checking in at the security gate and providing identification for a security screening, (b) (6), Hazardous and Solid Waste Compliance Manager at Kings Bay immediately received the inspectors. The inspectors introduced themselves, showed their credentials, and explained the purpose of the visit. The inspectors and (b) (6) proceeded to the Public Works Building for the opening conference.

The inspectors described the anticipated use of equipment (digital camera) during the inspection and provided a request for records. Cameras and electrical devices are not allowed in certain areas of the facility for visitors. For those secured areas, (b) (6) took photos with an approved digital camera and provided photos via email. The EPA inspector explained that the Small Business Regulatory Enforcement Fairness Act's classification of a "small business" is generally set by the Small Business Administration using the business' SIC/NAICS code and annual receipts or number of employees. A copy of the EPA's information sheet for small businesses can be found at <https://www.epa.gov/sites/production/files/2017-06/documents/smallbusinessinfo.pdf>. The EPA inspector also discussed the facility's ability, pursuant to 40 C.F.R. § 2.203, to assert a business confidentiality claim for information submitted to EPA. The facility did not assert a business confidentiality claim.

(b) (6) provided an overview of the facility's history and current operations during the opening conference. The inspection participants also discussed health and safety protocols and required personal protective equipment before (b) (6) led the inspectors on a tour of the facility operations.

11) Inspection Observations

Building 6020—Hazardous Waste Storage Facility:

Hazardous wastes from the central accumulation areas (CAAs), nonhazardous wastes, and universal wastes located throughout Kings Bay are transported to the permitted hazardous waste storage facility in Building 6020. CAAs are also called "less than 90-day temporary collection areas" (TCAs) at the facility where CAAs are only needed for a certain period of time. Building 6020 is located in a gated area. The entrance into the building is identified with a sign that reads "No Smoking within 50 Feet" and another sign that reads "Danger Authorized Personnel Only" (Photo 1). The inspectors met with Jacobs Support Services personnel who operate Building 6020. The inspectors were introduced to (b) (6), Environmental Manager; (b) (6), Hazardous Waste Manager; and (b) (6), Hazardous Waste Handler.

All hazardous waste and nonhazardous waste containers are assigned a waste ID number for identification and inventory purposes. The ID number details the accumulation start date for the waste, where the waste originated from, where the waste is located within the building, and information on waste determinations. Hazardous waste is separated and stored based on compatibility in one of 12 bays within the building (Photos 2-5). Spill and fire control equipment

were located throughout the building. Emergency equipment was last inspected in January 2024.

Adequate aisle space was observed for hazardous waste containers and there were no visible signs of cracks or damage to the concrete containment. Each container of hazardous waste was observed to be closed, labeled with the words “Hazardous Waste”, marked with an indication of the hazard of the contents, and dated with an accumulation start date. The oldest date recorded was 09/22/2023, which is compliant with the one-year accumulation time limit. The inspectors reviewed the current inventory report to check for accuracy of the amount and type of hazardous waste onsite. Based on what was observed onsite and the inventory report, the facility was compliant in storing waste below the storage capacity limit of 59,840 gallons (equivalent to 1,088 55-gallon drums). The inspectors also selected the following waste ID numbers to review waste profiles: Garnet Sludge 24660222, Non-flammable Adhesives Sealants 24333006, and Blast Media 24338010.

Behind Building 6020 is a concrete pad with a roof which stores used oil, an aerosol can puncture device and a satellite accumulation area (SAA) for spent aerosol cans. The inspectors observed the following wastes (Photos 6-8):

- Three (3) 55-gallon containers of used oil. The containers were closed and labeled “Used Oil”; and
- One (1) 55-gallon SAA container of paint waste. The container was closed, labeled “Hazardous Waste”, and marked with an indication of the hazard of the contents.

Building 2010 Paint Shop:

This building is a general maintenance paint shop which also has an HVAC maintenance shop and several SAAs. The inspectors observed the following wastes (Photos 9-11):

- One (1) 55-gallon SAA container of used aerosol cans. The container was closed, labeled “Hazardous Waste”, and marked with an indication of the hazard of contents;
- One (1) 55-gallon SAA container of spent paint. The container was closed, labeled “Hazardous Waste”, and marked with an indication of the hazard of contents;
- One (1) 55-gallon container of used oil. The container was closed and labeled “Used Oil”; and
- One (1) 5-gallon container of spent thermostats. The container was labeled “Universal Waste—Used Mercury Thermostats”, closed, and dated 01/08/2024.

Building 2007 – Vehicle Maintenance:

This maintenance shop is used to perform maintenance on vehicles used throughout the facility. The inspectors observed the following wastes (Photos 12-18):

- Two (2) 55-gallon container of used oil filters. The container was closed and labeled “Used Oil Filters”;
- One (1) 55-gallon container of used diesel filters. The container was closed and labeled “Used Diesel Filters”;

- One (1) 30-gallon container of used gasoline filters. The container was closed and labeled “Used Gasoline Filters”;
- One (1) 55-gallon container of used gasoline filters. The container was closed and labeled “Used Gasoline Filters”;
- One (1) container of used antifreeze and water. The container was closed and labeled “Used Antifreeze”;
- One (1) 10-gallon used oil caddy. The container was closed and labeled “Used Oil”;
- One (1) parts washer which was closed and is serviced quarterly by Safety-Kleen;
- One (1) SAA container of spent aerosol cans. The container was closed, labeled “Hazardous Waste”, and marked with an indication of the hazard of contents; and
- One (1) SAA container of used solvent rags and debris. The container was closed, labeled “Hazardous Waste”, and marked with an indication of the hazard of contents.

Outside of Building 2007 the inspectors observed the following wastes on spill pallets:

- One (1) 55-gallon container of used anti-freeze. The container was closed and labeled “Used Anti-freeze”;
- One (1) 55-gallon container of used grease which was closed and labeled “Used Grease”; and
- One (1) 55-gallon SAA container of used solvent and debris. The container was closed, labeled “Hazardous Waste”, and marked with an indication of the hazard of contents.

Building 2032 – Paint Shop:

This building is another maintenance and paint shop. The inspectors observed the following wastes (Photos 19-20):

- One (1) 55-gallon SAA container of spent paint. The container was closed, labeled “Hazardous Waste”, and marked with an indication of the hazard of contents; and
- One (1) 30-gallon SAA container of spent aerosol cans. The container was closed, labeled “Hazardous Waste”, and marked with an indication of the hazard of contents.

Building 2024 – Thermal Plant:

The thermal plant is used to run hot and cold water throughout the base to different HVAC units. The inspectors observed the following wastes (Photos 21-22):

- One (1) 55-gallon container of used oil. The container was closed and labeled “Used Oil”; and
- One (1) 55-gallon SAA container of solvent rags and debris. The container was closed, labeled “Hazardous Waste”, and marked with an indication of the hazard of contents.

Fuel Farm and Building 2030:

The fuel farm stores two 210,000-gallon above ground storage tanks, one for diesel and one for gasoline fuel. There is also one 500-gallon above ground storage tank for new lubricant oil. The inspectors observed the following wastes inside the fuel farm in Building 2030 (Photos 23-25):

- One (1) 55-gallon container of used gasoline. The container was closed, labeled “Hazardous Waste”, and marked with an indication of the hazard of contents;
- One (1) 55-gallon container of used diesel fuel oil. The container was closed and labeled “Nonhazardous Waste – Used Diesel Fuel Oil”;
- One (1) 55-gallon container of oily debris. The container was closed and labeled “Nonhazardous Waste – Oily Debris”; and
- One (1) 55-gallon container of used diesel fuel filters. The container was closed and labeled “Nonhazardous Waste Used Diesel Fuel Filters”.

Building 2013 – Explosive Ordinance Disposal (EOD):

The inspectors were introduced to (b) (6), EOD 1 who explained that EOD staff conduct OB/OD activities at the permitted OB/OD Range. Building 2013 is their office. Cleaning and maintenance activities generate greasy oil debris and used igniters from demolition activities. The inspectors observed the following wastes (Photo 26):

- One (1) 15-gallon SAA container of used M60 and M81 igniters. The container was closed, labeled “Hazardous Waste”, and marked with an indication of the hazard of contents;
- One (1) 5-gallon SAA container of spent aerosol cans. The container was closed, labeled “Hazardous Waste”, and marked with an indication of the hazard of contents; and
- One (1) 30-gallon container of oil/ greasy debris. The container was closed and labeled “Nonhazardous Waste—Oil/ Greasy debris”.

Building 3036 – Missile Parts Warehouse:

This building is operated by Lockheed Martin and is a storage facility for missile parts and other material. The building also operates a CAA. The CAA is identified with signage that reads “Caution Hazardous Waste Area”, “No Smoking”, and “Danger Unauthorized Personnel Keep Out”. Fire control and spill control equipment are located near the CAA. The inspectors observed fourteen (14) containers varying in size (1-gallon to 55-gallons) of hazardous wastes (Photo 27). Adequate aisle space was observed for the containers in the CAA. All containers were closed, labeled “Hazardous Waste”, marked with an accumulation start date, and marked with an indication of the hazard of contents. The oldest date observed was 01/02/2024.

Building 3019 – Maintenance Support Building:

This building conducts maintenance operations for activities conducted in the controlled area (CA) portion Kings Bay. No hazardous waste was observed in this area. The inspectors observed the following wastes:

- One (1) 55-gallon container of used oil. The container was closed and labeled “Used Oil”;
- Five (5) 55-gallon containers labeled “Nonhazardous Waste” for oily/ greasy debris, adhesive debris, nonhazardous paint-related debris, adhesive sealant debris, and DS-104/ BioAct 105 Debris; and
- One (1) 5-gallon container labeled “Nonhazardous Waste” dry cell batteries.

Building 3020 – Equipment Maintenance:

This building is used to conduct maintenance operations for all CA vehicles. No hazardous waste was observed in this area. The inspectors observed the following nonhazardous wastes:

- Two (2) 55-gallon containers of oily/ greasy debris. The containers were closed and labeled “Nonhazardous”;
- One (1) 20-gallon container of used diesel fuel filters. The container was closed and labeled “Nonhazardous Waste”; and
- One (1) 55-gallon container of parts washer waste. The container was closed and labeled “Nonhazardous Waste”. The inspectors requested the SDS for the parts washer liquid which is called Super Agitene 141. The product is nonhazardous when disposed.

Building 3044 – RIB:

X-ray testing is conducted inside this building. The inspectors could not enter the building due to current testing. Silver is recovered from the processing of x-ray film. There is an SAA located just outside of the building in an enclosed shelter. The inspectors observed the following nonhazardous wastes:

- One (1) 45-gallon container of oily greasy debris. The container was closed and labeled “Nonhazardous Waste”; and
- Two (2) 5-gallon containers of oily grease debris. The containers were closed and labeled “Nonhazardous Waste”.

Building 3072 – Small Arms Range:

The Small Arms Range is a shooting range and training facility. This building has two “less than 90-Day” TCAs (CAAs) which will be called TCA-1 and TCA-2 in this report. TCA-1 is for lead contaminated debris generated from sweeping and cleaning inside the range. The TCA-2 is for the lead contaminated debris that is collected from the two dust collectors behind the building. The inspectors were introduced to George Jenkins, Range Safety Officer who stated that it takes about two years for the dust collector waste to fill a 55-gallon container. Waste from the two TCAs is transported to the Hazardous Waste Storage Facility before the 90-day accumulation time limit. The inspectors observed the following hazardous wastes:

- TCA-1: Two (2) 55-gallon containers of lead contaminated debris. The containers were closed, labeled “Hazardous Waste”, marked with an accumulation start date of 02/02/2024, and marked with an indication of the hazard of contents;
- TCA-1 SAA: Two (2) 55-gallon SAA containers of lead contaminated debris connected to the two dust collectors. The containers were labeled “Hazardous Waste” and marked with an indication of the hazard of contents; and
- TCA-2: One (1) 55-gallon container of lead contaminated debris/ floor sweepings. The container was closed, labeled “Hazardous Waste”, marked with an accumulation start date of 02/26/2024, and marked with an indication of the hazard of contents.

Building 1028 – Medical Clinic:

The medical clinic consists of a pharmacy, dental clinic, and laboratory. The pharmacy manages hazardous waste pharmaceuticals pursuant to 40 C.F.R 266 Subpart P.

Pharmacy

The inspectors observed the following wastes in the pharmacy (Photos 28-29):

- One (1) 5-gallon container of empty aspirin bottles. The closed container was labeled “Nonhazardous Pharmaceutical Waste”;
- One (1) 1-gallon container of pharmaceutical waste for liquid toxic drugs. The container was closed, labeled “Hazardous Waste Pharmaceuticals”, and dated 10/25/2023;
- One (1) 1-gallon container of pharmaceutical waste for solid toxic drugs. The container was closed, labeled “Hazardous Waste Pharmaceuticals”, and dated 10/25/2023; and
- Four (4) 5-gallon closed containers of expired/ near expiration medication to be sent to a reverse distributor.

The inspectors requested to review the reverse distributor log for sent expired hazardous waste pharmaceuticals to Pharma Logistics. The reverse distributor log was available for review. No issues were noted.

Dental Clinic

The inspectors observed the following wastes in the Dental Clinic (Photo 30):

- One (1) 5-gallon SAA container of dental amalgam waste. The container was closed, labeled “Hazardous Waste”, and marked with an indication of the hazard of the contents; and
- One (1) 5-gallon SAA container of waste aerosol cans. The container was closed, labeled “Hazardous Waste”, and marked with an indication of the hazard of the contents.

Laboratory

The inspectors observed the following waste in the onsite laboratory (Photo 31):

- One (1) 5-gallon container of methanol waste. The container was closed, labeled “Hazardous Waste”, and marked with an indication of the hazard of the contents.

Medical Supply Room

The inspectors observed the following wastes in the medical supply (Photos 32-33):

- One (1) 5-gallon SAA container of waste hand sanitizer. The container was closed, labeled “Hazardous Waste”, and marked with an indication of the hazard of the contents;
- One (1) 5-gallon SAA container of waste aerosol cans. The container was closed, labeled “Hazardous Waste”, and marked with an indication of the hazard of the contents; and
- One (1) 5-gallon container of nonhazardous waste dry cell batteries.

B134—Hazardous Materials Storage Room

- This room is reserved as a TCA (temporary CAA). No hazardous waste was observed in this room at the time of the inspection.

OB/OD Range:

The inspectors went out to the OB/OD range to inspect the monitoring wells onsite and to see if there were any hazardous waste containers generated from OB/OD activities. EOD staff request containers to transport the treated hazardous waste to the permitted storage facility after OB/OD activities. The waste is picked up within 72 hours of completion of OB/OD activity. All monitoring wells were locked and secure with no issues noted (Photos 34-39). No hazardous waste was observed in the OB/OD Range.

End of Day 1 of the inspection.

Day 2 February 28, 2024

The inspectors began Day 2 of the inspection by being escorted by (b) (6) to obtain swipe access which is additional visitor identification card clearance to gain access to the Waterfront.

WATERFRONT:

The inspectors were introduced to (b) (6), Environmental Supervisor of the Trident Refit Facility (TRF) at Kings Bay and Will Green, Hazardous Waste Program Manager for the TRF.

Building—5073:

This building is used as a paint shop for submarines. The inspectors observed the following wastes:

- One (1) 55-gallon container of paint waste. The SAA container was closed, labeled “Hazardous Waste”, and marked with an indication of the hazard of the contents; and
- One (1) 55-gallon container of oily/ greasy debris. Labeled “Nonhazardous Waste”.

Building—5055 Paint Booth:

This building contains a large paint booth for large submarine pieces. Paint booth filters are managed as hazardous waste and changed out by Jacobs Support Services. The inspectors observed the following hazardous wastes in SAAs:

- Two (2) 55-gallon SAA containers of paint waste with solvents. The container was closed, labeled “Hazardous Waste”, and marked with an indication of the hazard of contents;
- One (1) 30-gallon SAA container of paint waste with solvents. The container was closed, labeled “Hazardous Waste”, and marked with an indication of the hazard of contents; and
- One (1) 55-gallon container of paint trash labeled “nonhazardous”.

Hazardous Waste Central—TCA:

This trailer is a “temporary” less than 90-day CAA for all SAAs in the Waterfront. From here, the waste is transported to the hazardous waste storage facility at Building 6020. There is a “No Smoking” sign displayed in front of the entrance to the trailer. The trailer is equipped with a fire suppressant system. Spill control equipment is located near the entrance to the trailer. The inspectors observed the following wastes:

- Two (2) 55-gallon containers of nonhazardous waste epoxy resin. The container was labeled “Nonhazardous Waste”;
- One (1) 10-gallon container of paint-related debris. The container was closed, labeled “Hazardous Waste”, dated 02/07/2024, and marked with an indication of the hazard of the contents;
- One (1) 20-gallon container of paint waste. The container was closed, labeled “Hazardous Waste”, dated 12/27/2023, and marked with an indication of the hazard of the contents;
- One (1) 55-gallon container of oily/ greasy debris. The container was labeled “Nonhazardous Waste”; and
- One (1) 5-gallon container of universal waste batteries. The container was closed, labeled “Universal Waste—Used Batteries”, and dated 02/09/2024.

PDS2—Hazmat:

PDS2 is a trailer that serves as a paint distribution shop and SAA for paint waste generated on submarines. The inspectors observed the following wastes:

- One (1) 55-gallon SAA container of paint-related waste debris. The container was closed, labeled “Hazardous Waste”, and marked with an indication of the hazard of contents; and
- One (1) 55-gallon SAA container of paint waste with MEK. The container was closed, labeled “Hazardous Waste”, and marked with an indication of the hazard of contents.

Building—4041 Consolidated Sandblast and Paint Facility and Lockheed Martin TCA:

This building is also dedicated to painting activities for submarine parts. This building contains a paint booth and a blast booth. The inspectors observed the following wastes in this area:

- One (1) 55-gallon SAA container of paint can crusher waste. The container was closed, labeled “Hazardous Waste”, and marked with an indication of the hazard of contents;
- One (1) 55-gallon SAA container of paint waste. The container was closed, labeled “Hazardous Waste”, and marked with an indication of the hazard of contents; and
- Four (4) 55-gallon SAA containers of blast media from four different points of generation. The containers were closed, labeled “Hazardous Waste”, and marked with an indication of the hazard of contents.

Lockheed Martin managed a less than 90-day TCA in this building. Fire control equipment and spill control equipment are located near to this TCA. The inspectors observed the following waste:

- Ten (10) 55-gallon containers of hazardous waste. All containers were closed, labeled “Hazardous Waste” marked with an indication of the hazard of contents, and dated with the oldest accumulation start date being 02/07/2024.

Building 4024—TRF TCA:

This building is a CAA for waste generated at the Trident Refit Facility (TRF) (Photos 40-42). The CAA is equipped with spill control equipment and fire control equipment. Acid wastes are separated from ignitable waste. All containers of hazardous waste were closed, labeled “Hazardous Waste,” marked with an indication of the hazard of contents, and dated with the oldest accumulation start date being 01/05/2024.

Building—4026 TRF:

This building is used for parts manufacturing and refurbishing of submarine parts. Several SAAs are located inside the TRF. The inspectors observed the following wastes:

- One (1) 30-gallon container of plating waste and mixed debris. The container was closed, labeled “Hazardous Waste”, and marked with an indication of the hazard of the contents;
- One (1) 5-gallon container of silver-plating waste. The container was closed, labeled “Hazardous Waste”, and marked with an indication of the hazard of the contents;
- One (1) 15-gallon container of plating solution waste. The container was closed, labeled “Hazardous Waste”, and marked with an indication of the hazard of the contents;
- Two (2) 55-gallon containers of oily debris. The containers were labeled “Nonhazardous Waste”;
- One (1) cubic yard box of oily/ greasy debris. The box was labeled “Nonhazardous Waste”;
- Two (2) 5-gallon containers of diesel fuel filters. The containers were labeled “Nonhazardous Waste”;
- One (1) 5-gallon container of used batteries. The container was labeled “Universal Waste—Used Batteries”, closed, and dated 12/14/2023;
- One (1) 55-gallon container of used oil. The container was closed and labeled “Used Oil”; and
- Two (2) 55-gallon containers of used oil filters/ oily greasy debris. The container was labeled “Nonhazardous Waste”.

Building—2048 TRF:

This building is another parts manufacturing and refurbishing shop for submarines. Multiple SAAs are located within each shop in this building (Photos 43-46).

Periscope Shop

The inspectors observed the following wastes:

- One (1) 40-gallon container of oily/ greasy debris. The container was labeled “Nonhazardous Waste”;
- One (1) 20-gallon SAA container of solvent rags and debris. The container was closed, labeled “Hazardous Waste”, and marked with an indication of the hazard of the contents;
- One (1) 20-gallon SAA container of blast media. The container was closed, labeled “Hazardous Waste”, and marked with an indication of the hazard of the contents;
- One (1) 5-gallon SAA container of spent Ozzie Juice from parts washer. The container was closed, labeled “Hazardous Waste”, and marked with an indication of the hazard of the contents;
- One (1) 15-gallon container of used oil. The container was closed and labeled “Used Oil”;
- One (1) 2-gallon SAA container of solvent and debris. The container was closed, labeled “Hazardous Waste”, and marked with an indication of the hazard of the contents;
- One (1) 5-gallon SAA container of used solvent rags. The container was closed, labeled “Hazardous Waste”, and marked with an indication of the hazard of the contents;
- One (1) 2-gallon SAA container of used solvent rags and debris. The container was closed, labeled “Hazardous Waste”, and marked with an indication of the hazard of the contents; and
- One (1) 5-gallon container of oily/ greasy debris. The container was labeled “Nonhazardous Waste”.

Micro-soldering:

The inspectors observed the following wastes:

- Two (2) 5-gallon SAA container of solder and debris. The containers were closed, labeled “Hazardous Waste”, and marked with an indication of the hazard of the contents;
- Five (5) 1-gallon SAA containers of solder and debris. The containers were closed, labeled “Hazardous Waste”, and marked with an indication of the hazard of the contents;
- One (1) 1-gallon container of oily/ greasy debris. The container was labeled “Nonhazardous Waste”;
- One (1) 1-gallon container of used non-recyclable lead acid batteries. The container was closed, labeled “Hazardous Waste”, and marked with an indication of the hazard of the contents; and
- One (1) 1-gallon container of used recyclable lead acid batteries. The container was closed, labeled “Universal Waste—Used Lead Acid Batteries”, and dated 08/31/2023.

Unites States Coast Guard Station:

The Coast Guard operates two coastguard cutters at this location. The following waste was observed inside a storage shed on the dock:

- One (1) 55-gallon container of diesel fuel filters. Closed and labeled “Nonhazardous Waste”; and
- One (1) 60-gallon container of diesel fuel filters. Closed and labeled “Nonhazardous Waste”.

Industrial Wastewater Treatment Facility:

This is a wastewater treatment facility for the entire base. The facility has a less than 90-day TCA. The inspectors observed the following waste at the TCA:

- Three (3) 55-gallon SAA containers of waste ammonium hydroxide solution. The containers were closed, labeled “Hazardous Waste”, marked with an indication of the hazard of the contents, and dated 12/18/2023.

Swimmer Defense:

This facility is used to train military marine mammals and has a veterinary clinic. The inspectors observed the following waste:

- One (1) 5-gallon SAA container of isopropanol waste. The container was closed, labeled “Hazardous Waste”, and marked with an indication of the hazard of the contents;
- One (1) 5-gallon SAA container of punctured aerosol cans. The container was closed, labeled “Hazardous Waste”, and marked with an indication of the hazard of the contents;
- One (1) 3-gallon SAA container of spent aerosol cans. The container was closed, labeled “Hazardous Waste”, and marked with an indication of the hazard of the contents; and
- One (1) 5-gallon container of used oil. The container was closed and labeled “Used Oil”.

Building—4001 Water Plant:

This water plant is for drinking water. The inspectors observed the following wastes:

- One (1) 5-gallon SAA container of hydrochloric acid waste. The container was closed, labeled “Hazardous Waste”, and marked with an indication of the hazard of the contents;
- One (1) 5-gallon SAA container of waste Phosver 3 reagent solution. The container was closed, labeled “Hazardous Waste”, and marked with an indication of the hazard of the contents; and
- One (1) 5-gallon SAA container of chloride waste. The container was closed, labeled “Hazardous Waste”, and marked with an indication of the hazard of the contents.

Building—1068 Marine Corps Armory:

Lead-contaminated debris is generated from the cleaning of weapons. The inspectors observed one (1) 55-gallon SAA container of lead-contaminated debris. The container was closed, labeled “Hazardous Waste”, and marked with an indication of the hazard of the contents.

Security Department:

Only DEA-controlled waste is generated at this location.. No hazardous waste was observed at this location.

Building 1003—Vet Clinic:

The inspectors observed one (1) 15-gallon SAA container for waste aerosol cans. The container was closed, labeled “Hazardous Waste”, and marked with an indication of the hazard of the contents.

End of Day 2 of the inspection.

Day 3 February 29, 2024

Records Review

Contingency Plan and Quick Reference Guide (QRG):

The actions that facility personnel should take in response to an emergency are described in the facility’s contingency plan, which was last updated in March 2020.

The plan describes actions facility personnel must take in response to fires, explosions, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water at the facility.

The plan describes arrangements agreed to with the local police department, fire department, other emergency response teams, emergency response contractors, equipment suppliers, local hospitals or the Local Emergency Planning Committee. The plan lists the names and emergency telephone numbers for persons identified as emergency coordinators. The Fire Chief for Fire Station 1 is listed as the primary emergency coordinator and the on-duty Assistant Fire Chief for Fire Station 1 is listed as the alternate. The plan includes a list of all emergency equipment at the facility. The list includes fire extinguishing systems, spill control equipment, communications and alarm systems, and decontamination equipment. The list appears to be up to date. The plan includes the location and a physical description of each item on the list, and a brief outline of its capabilities.

The plan includes an evacuation plan for personnel. This plan describes signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes.

A copy of the contingency plan (and its quick reference guide) was most recently submitted to Submarine Base Kings Bay Security, Camden County Sheriff’s Department, Submarine Base Kings Bay Fire Department, Camden County Fire Rescue, Kingsland Fire Department, St. Mary’s Fire Department, Nassau County Fire Rescue, Naval Branch Health Clinic Kings Bay, Southeast Georgia Health System, Submarine Base Kings Bay Emergency Operations Center, and Camden County Emergency Management on May 20, 2020.

The quick reference guide includes the types/names of hazardous waste in layman’s terms and the associated hazard associated with each hazardous waste present at any one time; the

estimated maximum amount of each hazardous waste that may be present at any one time; the identification of any hazardous wastes where exposure would require unique or special treatment by medical or hospital staff; a map of the facility showing where hazardous wastes are generated, accumulated and treated and routes for accessing these wastes; a street map of the facility in relation to surrounding businesses, schools and residential areas; the locations of water supply; the identification of on-site notification systems; and the name of the emergency coordinator(s) and emergency telephone number(s).

Training Records:

The inspectors reviewed facility job descriptions and employee names that were provided for environmental managers, hazardous waste managers, and hazardous waste handlers. Each description included the requisite skill, education, or other qualifications, and duties of facility personnel assigned to that position.

The facility provided a written description of the type and amount of both introductory and continuing training to be given to each person filling the positions listed above. The inspectors reviewed records of employee hazardous waste training completed from 2023 to now. Training was reviewed for Terri Mason, George Walton, Prakash Acharya, Lawrence Northrup, and Sam Renshaw.

Waste Manifest and Land Disposal Restriction (LDR) Records:

The inspectors reviewed available hazardous waste manifest records and land disposal restriction forms for shipments of hazardous waste sent since 2021. Hazardous waste manifest records show that hazardous waste and universal waste is routinely shipped to Clean Harbors Reidsville (EPA ID NCD000648451) in Reidsville, NC and Tradebe (EPA ID TND000772186) in Millington, TN. The facility most recently shipped hazardous waste on 02/22/2024 to Tradebe.

Weekly Inspection Records:

The inspectors reviewed the facility's available records of inspections of the hazardous waste central accumulation area (CAA) since 08/16/2021. The records include condition of containers, the number of containers, the date and time of the inspection and the name of the employee conducting the inspection. Employees do routinely record inspection observations and subsequent follow-up actions on the inspection log.

Waste Analysis Plan:

The facility's waste analysis plan was available for review along with waste determinations and waste profiles.

Waste Profiles and Laboratory Analysis:

Jacobs Support Services records and manages waste determinations and profiles in Waste Information Documents (WIDs). WIDs and laboratory analysis were available for review at the Hazardous Waste Storage Facility.

OB/OD Records for Treatment of Waste Munitions Per Day:

Records were provided for total lead emissions during OB/OD activities. It appears the facility is operating well below the limits of treatment of 0.5 short tons Net Explosive Weight per day of waste munitions and explosives by open burning; and treatment of 0.6 short tons Net Explosive Weight per day of waste munitions and explosives by open detonation.

12) Closing Conference

The inspectors conducted the exit meeting with (b) (6) Hazardous Waste Manager. During this meeting, the inspectors stated their preliminary conclusions of the inspection.

13) List of Appendices

Appendix 1 – Photo Log:

14) Signed

KAYLA ACOSTA Digitally signed by KAYLA
ACOSTA
Date: 2024.05.01 09:10:33 -04'00'

Kayla Acosta
Physical Scientist

15) Concurrence

ALAN NEWMAN Digitally signed by ALAN NEWMAN
Date: 2024.05.06 09:14:43 -04'00'

Alan R. Newman, Acting Chief
RCRA Enforcement Section

Appendix 1 – Photo Log

[45] Photos taken on: February 27-29, 2024

Photos taken by: Kayla Acosta and (b) (6)

Photos taken with: iPad (Kayla Acosta) and Digital Camera (b) (6)

EPA Property Tag for iPad: SS8386



Photo 1: Front of (b) (3) (A) — (b) (3) (A) (b) (3) (A) Facility. Photo taken with iPad in Smart Tools. 2/27/24, 8:56 AM.

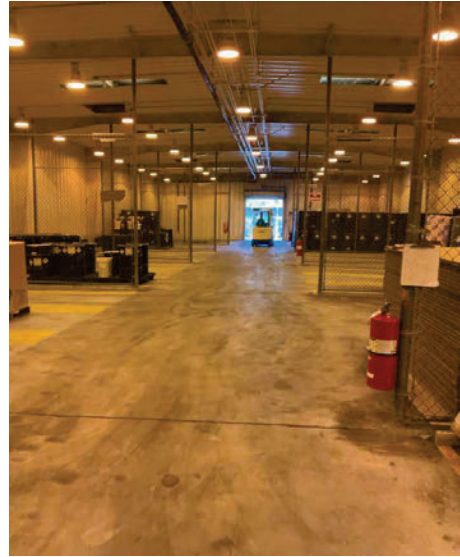


Photo 2: (b) (3) (A) — (b) (3) (A) (b) (3) (A) Photo taken with iPad in Smart Tools. 2/27/24, 9:03 AM.



Photo 3: (b) (3) (A) — (b) (3) (A) (b) (3) (A) . Photo taken with iPad in Smart Tools. 02/27/24, 9:15 AM.



Photo 4: (b) (3) (A) — (b) (3) (A) (b) (3) (A) . Photo taken with iPad in Smart Tools. 2/27/24, 9:15 AM.



Photo 5: (b) (3) (A) — (b) (3) (A)
(b) (3) (A). Photo taken with iPad in Smart Tools. 2/27/24, 9:15 AM.



Photo 6: (b) (3) (A) — (b) (3) (A)
(b) (3) (A). Photo taken with iPad in Smart Tools. 2/27/24, 9:33 AM.



Photo 7: (b) (3) (A) — (b) (3) (A)
(b) (3) (A). Used oil 55-gallon containers. Photo taken with iPad in Smart Tools. 2/27/24, 9:35 AM.



Photo 8: (b) (3) (A) — (b) (3) (A)
(b) (3) (A). SAA for spent aerosol cans. Photo taken with iPad in Smart Tools. 2/27/24, 9:38 AM.



Photo 9: (b) (3) (A) — (b) (3) (A)
(b) (3) (A) . Photo taken with iPad in Smart Tools. 2/27/24, 10:14 AM.

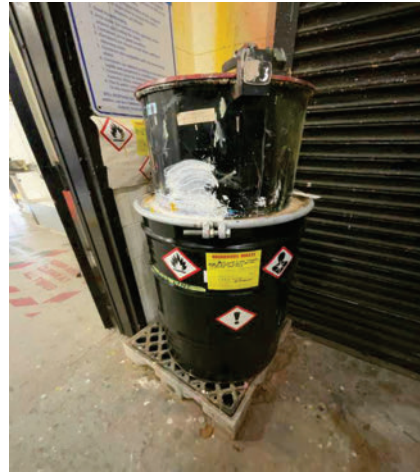


Photo 10: (b) (3) (A) — (b) (3) (A)
(b) (3) (A) . Photo taken with iPad in Smart Tools. 2/27/24, 10:17 AM.



Photo 11: (b) (3) (A) — (b) (3) (A)
(b) (3) (A)
(b) (3) (A) . Photo taken with iPad in Smart Tools. 2/27/24, 10:21 AM.



Photo 12: Building (b) (3) (A)
(b) (3) (A)
(b) (3) (A) . Photo taken with iPad in Smart Tools. 2/27/24, 10:25 AM.



Photo 13: Building (b) (3) (A)
 (b) (3) (A)
 (b) (3) (A) Photo
 taken with iPad in Smart Tools. 2/27/24, 10:25
 AM.

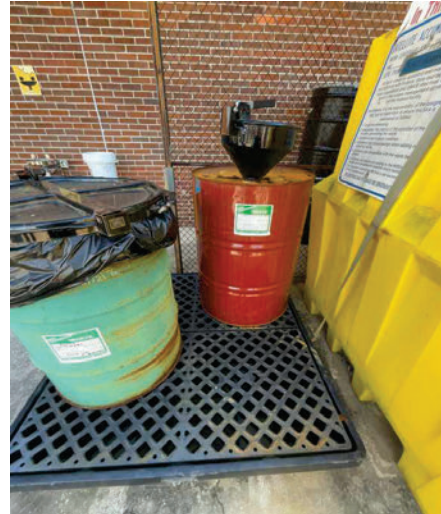


Photo 14: Outside building (b) (3) (A) (b) (3) (A)
 (b) (3) (A)
 (b) (3) (A) Photo
 taken with iPad in Smart Tools. 2/27/24,
 10:28 AM.



Photo 15: Outside building (b) (3) (A)
 (b) (3) (A)
 (b) (3) (A)
 (b) (3) (A) Photo
 taken with iPad in Smart Tools. 2/27/24, 10:29
 AM.



Photo 16: Building (b) (3) (A)
 (b) (3) (A)
 (b) (3) (A)
 (b) (3) (A) Photo
 taken with iPad in Smart Tools. 2/27/24, 10:30
 AM.



Photo 17: Building (b) (3) (A)
 (b) (3) (A) Photo
 taken with iPad in Smart Tools. 2/27/24, 10:34
 AM.



Photo 18: Building (b) (3) (A)
 (b) (3) (A)
 (b) (3) (A)
 (b) (3) (A) Photo taken with iPad in Smart Tools.
 2/27/24, 10:35 AM.



Photo 19: Building (b) (3) (A)
 (b) (3) (A) Photo taken with iPad in
 Smart Tools. 2/27/24, 10:39 AM.



(b) (3) (A)
 (b) (3) (A) Photo taken with iPad in
 Smart Tools. 2/27/24, 10:40 AM.



Photo 21: Building (b) (3) (A). Photo taken with iPad in Smart Tools. 2/27/24, 10:50 AM.



Photo 22: Building (b) (3) (A). Photo taken with iPad in Smart Tools. 2/27/24, 10:50 AM.



Photo 23: Building (b) (3) (A). Photo taken with iPad in Smart Tools. 2/27/24, 10:59 AM.



Photo 24: Building (b) (3) (A). Photo taken with iPad in Smart Tools. 2/27/24, 10:59 AM.



Photo 25: (b) (3) (A)

(b) (3) (A)

(b) (3) (A)

taken

with iPad in Smart Tools. 2/27/24, 11:00 AM.



Photo 26: Building (b) (3) (A)

(b) (3) (A)

(b) (3) (A)

(b) (3) (A)

(b) (3) (A)

Photo taken by (b) (6)



Photo 27: Building (b) (3) (A)

(b) (3) (A)

. Photo taken

by (b) (6)

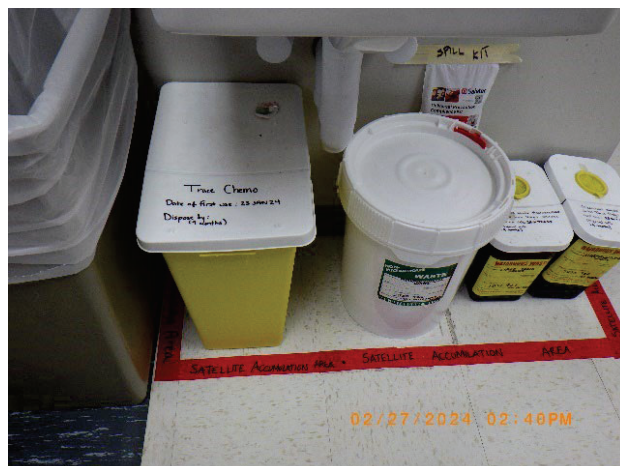


Photo 28: Building (b) (3) (A)

(b) (3) (A)

(b) (3) (A)

(b) (3) (A)

(b) (3) (A)

taken by (b) (6)

. Photo

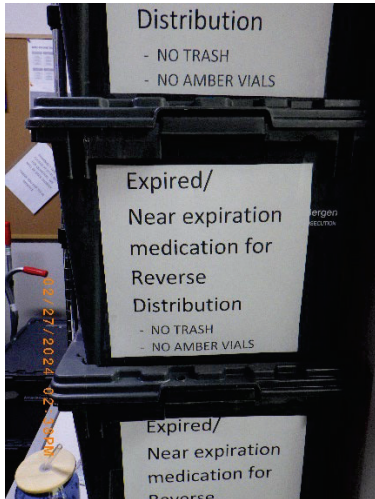


Photo 29: Building (b) (3) (A)
 (b) (3) (A)
 (b) (3) (A)
 (b) (3) (A). Photo taken by (b) (6).



Photo 30: Building (b) (3) (A)
 (b) (3) (A)
 (b) (3) (A)
 (b) (3) (A). Photo taken by (b) (6).

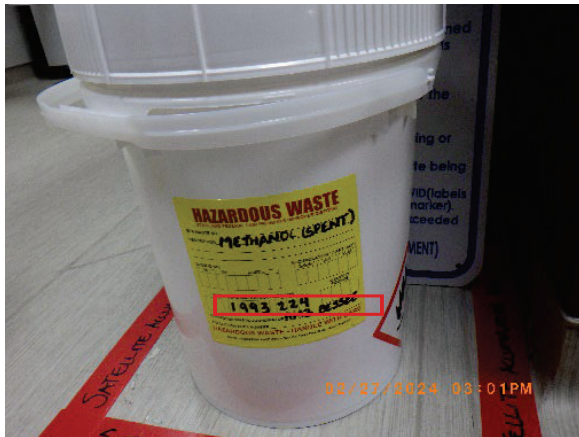


Photo 31: Building (b) (3) (A)
 (b) (3) (A)
 by (b) (6).



Photo 32: Building (b) (3) (A)
 (b) (3) (A)
 (b) (3) (A)
 (b) (3) (A). Photo
 taken by (b) (6).

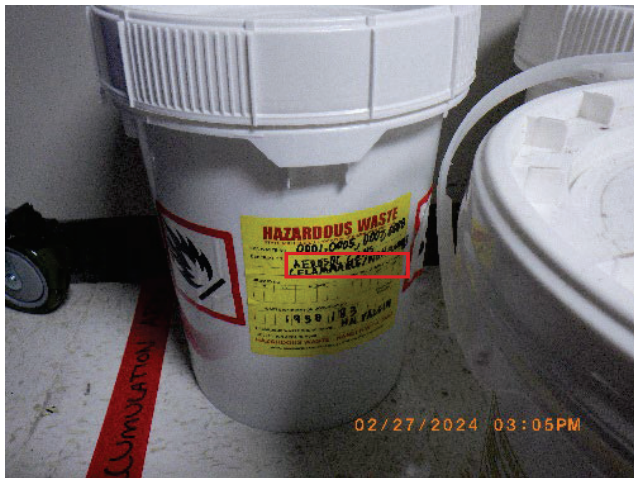


Photo 33: Building (b) (3) (A)

(b) (3) (A)

(b) (3) (A) Photo taken by (b) (6)



Photo 34: (b) (3) (A)

Photos taken by (b) (6)



Photo 35: (b) (3) (A)

Photos taken by (b) (6)



Photo 36: (b) (3) (A)

Photos taken by (b) (6)



Photo 37: (b) (3) (A)
Photos taken by (b) (6).



Photo 38: (b) (3) (A)
Photos taken by (b) (6).



Photo 39: (b) (3) (A)
Photos taken by (b) (6).



Photo 40: Building (b) (3) (A)
Photo taken by (b) (6).



Photo 41: Building (b) (3) (A) Photo taken by (b) (6).



Photo 42: Building (b) (3) (A) Photo taken by (b) (6).



Photo 43: (b) (3) (A) Photo taken by (b) (6)



Photo 44: Building—(b) (3) (A) Photo taken by (b) (6)

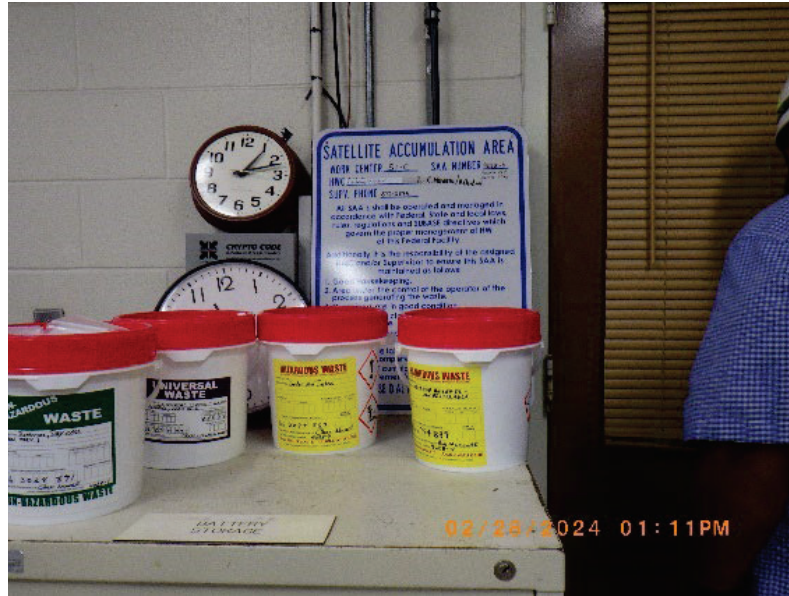


Photo 45: (b) (3) (A)
(b) (3) (A)

Photo taken by (b) (6)