

RCRA Compliance Evaluation Inspection Report

1) **Inspector and Author of Report**

Parvez Mallick
Environmental Engineer
Enforcement and Compliance Assurance Division
Chemical Safety and Land Enforcement Branch
RCRA Enforcement Section
U.S. Environmental Protection Agency–Region 4
Sam Nunn Atlanta Federal Center
61 Forsyth Street, S.W.
Atlanta, Georgia 30303
Phone: (404) 562-8594
Fax: (404) 562-8566
E-mail: mallick.parvez@epa.gov

2) **Facility Information**

MacDill Air Force Base
7621 Hillsborough Loop Dr.
Tampa, Florida 33621
EPA ID #: FL6570024582

County: Hillsborough
Latitude: 27° 50' 42.4345"
Longitude: 82° 30' 6.7578"
Primary NAICS: 928110-National Security
SIC Code: 9711 - National Security

3) **Responsible Official**

Colonel Benjamin R. Jonsson
Commanding Officer
MacDill Air Force Base
8208 Hangar Loop Dr., Suite 1
MacDill AFB, Florida 33621
6ARW.cce@us.af.mil

Robert S. Ritch
Hazardous Waste Program Manager
Pacific Architects & Engineers
DoD Contractor 6th Civil Engineer Squadron
7621 Hillsborough Loop Dr.
MacDill AFB, Florida 33621
robert.ritch.ctr@us.af.mil

4) Inspection Participants

Parvez Mallick, U.S. EPA, Region 4
Leslie Pedigo, Florida Department of Environmental Protection (FDEP)
Shannon Lenhart, FDEP
Jeff Gregg, FDEP
Warren McNelley, FDEP
Robert Denoux, FDEP
Robert Ritch, Environmental Manager, Pacific Architects and Engineers, Inc.

5) Dates of Inspection

March 29, 2022, 9:30 a.m.

6) Applicable Regulations

Resource Conservation and Recovery Act (RCRA) Sections 3002, 3005 and 3007 (42 U.S.C. §§ 6922, 6925 and 6927), and the regulations promulgated pursuant thereto at 40 Code of Federal Regulations (C.F.R.) Parts 260-270, 273 and 279.

Florida Statutes (F.S.) Chapter 403.702 *et seq.*, and the regulations promulgated pursuant thereto and set forth at the Florida Administrative Code (Fla. Admin. Code Ann. r.), Chapters 62-710, 62-730 and 62-750.

Chapter 403 of the Florida Statutes, Fla. Stat. § 403.702 *et seq.*, and rules 62.710.210-.901, and 62-730 *et seq.* of the Florida Administrative Code Annotated (Fla. Admin. Code Ann.). RCRA Post Closure Permit No.: 0154498-HF-008, of the former Sludge Drying Beds and Surge Ponds including implementation of site-wide corrective action well monitoring.

Pursuant to Fla. Admin. Code Ann. r. 62-730.160(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 403.722 of the Florida Statutes, Fla. Stat. § 403.722 [Section 3005 of RCRA, 42 U.S.C. § 6925], provided that the generator complies with the conditions listed in Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.17] (hereinafter referred to as the “LQG Permit Exemption”).

Pursuant to Fla. Admin. Code Ann. r. 62-730.160(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 the 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 403.722 of the Florida Statutes, Fla. Stat. § 403.722 [Section 3005 of RCRA, 42 U.S.C. § 6925], and without complying with Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.16(b) or §262.17(a)], except as required in Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.15(a)(7) and (8)], provided that the generator complies with the satellite accumulation area conditions listed in Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.15(a)] (hereinafter referred to as the “SAA Permit Exemption”).

Pursuant to Fla. Admin. Code Ann. r. 62-730.185(1) [40 C.F.R. § 273.9], a “Small Quantity Handler of Universal Waste” (SQHUW) is a Universal Waste handler who does not accumulate

5,000 kilograms or more of Universal Waste (batteries, pesticides, mercury-containing equipment, or lamps, calculated collectively) at any time.

On February 7, 2020, the EPA added hazardous waste aerosol cans to the universal wastes outlined in title 40 C.F.R. Part 273, thereby giving generators the opportunity to choose the management method that best suits its operations. The State of Florida adopted the requirements of 40 C.F.R. Part 273 into the Florida Administrative Code (FAC 62-730) on October 30, 2020. It can either be managed as a universal waste or hazardous waste.

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

7) Purpose of Compliance Evaluation Inspection

On March 29, 2022, Leslie Pedigo, Shannon Lenhart, Jeff Gregg, Warren McNelley, and Robert Denoux of Florida Department of Environmental Protection (FDEP) and Parvez Mallick of the U.S. EPA conducted a routine compliance evaluation inspection (CEI) of the MacDill Air Force Base (MacDill AFB or the facility) to determine the facility's compliance with state and federal hazardous waste regulations. This was an EPA lead inspection. MacDill was represented by Mr. Robert Ritch, Environmental Manager, Pacific Architects and Engineers, Inc. Upon entering the facility, the inspectors introduced themselves, showed their credentials and explained the purpose of the visit and a description of the facility's process was discussed. The inspectors described the anticipated use of digital camera during the inspection. The inspectors briefly discussed the company's ability, pursuant to 40 C.F.R. § 2.203, to assert a business confidentiality claim for information submitted to the EPA. MacDill did not assert a business confidentiality claim. The inspection participants also discussed health and safety protocols and required personal protective equipment before Mr. Ritch led the inspectors on a tour of the federal facility operations. Waste Management at MacDill is contracted to Pacific Architects and Engineers, Inc. (PAE).

8) Facility Description

MacDill Air Force Base is located on a 5,638-acre secured installation on the southern tip of Hillsborough County's Interbay Peninsula. MacDill AFB was constructed as MacDill Field, a U.S. Army Corps, later U.S. Army Air Forces, installation just prior to World War II. With the establishment of the U.S. Air Force as an independent service in September 1947, it became MacDill Air Force Base. MacDill AFB became an Air Mobility Command installation in 1996 and home to the 6th Air Refueling Wing, its 310th Airlift Squadron flying the C-37A, and its 50th Air Refueling Squadron and 91st Air Refueling Squadron flying the KC-135. The 6 ARW is further augmented by the Air Force Reserve Command's 927th Air Refueling Wing and 63rd Air Refueling Squadron also flying KC-135s. MacDill AFB is also home to the headquarters for two of the U.S. military's unified combatant commands Headquarters, United States Central Command and United States Special Operation Command. MacDill AFB employs approximately 9,876 active-duty personnel and 4,073 civilians by providing more than 14,500 jobs and \$1.96 billion in payroll.

MacDill AFB's most recent Hazardous Waste Generator Notification (EPA Form 8700-12) dated February 27, 2020, characterized the facility as a treatment, storage, and disposal facility (TSD),

a large quantity generator (LQG) of hazardous waste and a small quantity handler of universal waste (SQHUW). Currently, MacDill may generate hazardous waste streams such as waste solvent, spent aerosol cans, paint waste, paint booth filters, spent blasting media, gasoline absorbent pads, solvent rags and debris, and other wastes, which include EPA Waste Codes D001, D003, D005, D006, D007, D008, D010, D018, D035, F003, and F005; used oil; universal wastes (such as spent batteries and certain types of lamps); and non-hazardous wastes.

9) **Previous Inspection History**

On June 23, 2021, FDEP conducted a RCRA CEI at the facility and no RCRA deficiencies were discovered.

10) **Inspection Findings**

Following the opening conference, the inspection team proceeded with the inspection. The inspectors inspected the following areas during the onsite inspection: 90-Day Storage Area (Building 1115), Marine Central Command, Universal Waste Transfer Station (Building 885), Army Airforce Exchange Service (AAFES) Gas Station, Airforce Ground Equipment (AGE) Shop, Aircraft Maintenance Squadron – Corrosion Control Shop, Aircraft Maintenance Squadron (AMS), Civil Engineering (CE) Squadron, Vehicular Maintenance Shop, Special Operations Command, and Joint Command Support Element (JCSE).

Below is a description of the observations made during the inspection. *Unless noted otherwise, for the walkthrough inspection:*

- *All initial accumulation point (IAP)/satellite accumulation area (SAA) hazardous waste containers were observed to be closed, marked with an indication of the hazards of the content description; and mark with the words “Hazardous Waste.”*
- *All containers of hazardous waste observed in the less than 90-day accumulation areas were closed, marked with an indication of the hazards of the content description, marked with the words “Hazardous Waste,” and accumulation start dates.*
- *All universal waste containers were observed to be closed, marked with a description of the universal waste being handled, the words “Universal Waste,” and accumulation start dates.*
- *All containers of used oil were marked “Used Oil.”*

90-Day Storage Area (Building 1115)

Building 1115 is the main less than 90-day hazardous waste storage area for MacDill. Hazardous waste is accumulated at the initial accumulation points (IAPs) located throughout the base. Full IAP waste containers are picked up by PAE personnel and transported to Building 1115, 90-Day Storage Area. The Building is comprised of four separate waste storage containment rooms. A fifth storage room, Bay 4, contains cleaning supplies. At the time of the inspection, the following wastes were present in each waste storage containment rooms:

Flammable Storage Room (Bay 1)

- Eleven closed 5-gallon containers of non-hazardous purple K media (extinguisher dry cleaner).

Corrosive Storage Room (Bay 2)

- Two 5-gallon containers of non-hazardous waste photo developer (pH between 4 and 5 s.u.);

- Two bins of soda ash.

Toxic Storage Room (Bay 3)

- Three metal and one polypropylene empty containers;
- One cubic yard box with decontamination kits and one spill kit.

Reactive Storage Room (Bay 5)

No wastes were present in Bay 5 during the inspection. Usually, universal waste aerosols are stored in this bay. There were several empty drums and spill supplies in Bay 5.

On March 29, 2022, A.R. Paquette and Company, Inc (EPA ID FLD982105884), a waste transporter, had picked up wastes from Building 1115 prior to the EPA and FDEP inspection. Manifest #024047598 JJK, pick up date of March 29, 2022, indicated that the designated facility was US Ecology Tampa, Inc. (EPA ID FLD981932494). According to the manifest this shipment included the following hazardous wastes:

- Four 55-gallon polypropylene containers of waste ethanol (EPA waste code D001);
- Five 55-gallon metal containers of waste solids containing cadmium and chromium (EPA waste code D005-D008);
- Six fiber boxes of waste solids containing cadmium and chromium (EPA waste code D005-D008);
- One 55-gallon metal container of waste aerosols; and
- Two 55-gallon metal containers of flammable liquids (EPA waste code D001, F001, and F005).

The inspectors observed an eye wash and shower in the 90-Day Storage Area. A phone is available for emergency communications. There was a large spill kit located outside the building. Several smaller spill kits and other cleanup supplies were present inside the building. Fire safety equipment was present and is periodically tested for operability.

The weekly container inspection logs are maintained in the Building 1115 and were up to date and complete at the time of the inspection. It appears that weekly inspections are conducted on Wednesdays by the PAE staff. Inspection logs from January 5, 2022, through March 23, 2022, were present in the inspection log and older inspection logs are maintained in the PAE office.

Marine Central Command

Marine Central Command building is located adjacent to Building 1115. The unit has been a tenant situated at MacDill since 2019. This unit conducts training. There were no wastes stored in this building during the inspection.

Universal Waste Transfer Station (Building 885)

MacDill has a transfer station where universal wastes and recyclable materials from the base's shops and residences are collected prior to disposal. Electronic waste is also collected in this area. This area is managed under contract by Six Nations, Inc., a Refuse, Recycling, and Integrated Solid Waste Management company. Containers in the process of being filled are stored inside the transfer station building. The inspectors observed the following containers in the building during the inspection:

- One closed 55-gallon metal container of spent alkaline batteries with an accumulation start date of September 10, 2020 (Photograph #1);

- One closed 55-gallon metal container of spent Ni-Cad batteries with an accumulation start date of February 25, 2022 (Photograph #1);
- One closed 55-gallon metal container of spent lithium batteries with an accumulation start date of February 7, 2022;
- One closed 55-gallon metal container of spent nickel metal hybrid batteries with an accumulation start date of June 1, 2021 (Photograph #1);
- One closed 55-gallon metal container of spent lead acid batteries with an accumulation start date of February 20, 2022;
- One closed 55-gallon metal container of broken florescent bulbs with an accumulation start date of February 27, 2020; and
- One cardboard tube of spent four-foot fluorescent bulbs with an accumulation start date of March 28, 2022. The container was not closed at the time of the inspection. A lid was placed on the container during the inspection.

Pursuant to Fla. Admin. Code Ann. r. 62-730.185(1) [40 C.F.R. § 273.13(d)(1)], a small quantity handler of universal waste must contain any lamp in containers or packages that are structurally sound, adequate to prevent breakage, and compatible with the contents of the lamps. Such containers and packages must remain closed and must lack evidence of leakage, spillage or damage that could cause leakage under reasonably foreseeable conditions.

Pursuant to Fla. Admin. Code Ann. r. 62-730.185(1) [40 C.F.R. § 273.15(a) and (c)], a small quantity handler of universal waste may accumulate universal waste no longer than one year and must be able to demonstrate the length of time that the universal waste has accumulated from the date that it became a waste or was received.

Army Airforce Exchange Service (AAFES) Gas Station

The inspectors observed a plastic bag containing used oily rags on top of a waste bucket at the time of the inspection. Mr. Ritch collected oily rags bag for disposal in a non-hazardous waste container. There was a spill kit is located at the AAFES Gas Station. The IAP located in an outdoor flammable cabinet contained a labeled five-gallon bucket which is used for the collection of spent kitty litter and absorbent pads used for incidental fuel spills at the gas station. The container was empty at the time of the inspection.

Air Force Ground Equipment (AGE) Shop

Air Force Ground Shop services generators used on aircraft. All containers were sitting on containment pallets. The following containers were stored in the AGE Shop:

- One closed 55-gallon metal container for the collection of drained used oil filters, marked “Used Oil Filters” (Photograph #2);
- One closed 55-gallon metal container for the collection of used antifreeze/coolant, marked “Coolant awaiting Recycling” (Photograph #2);
- One closed 55-gallon metal container for the collection of waste aerosol cans, marked “Universal Waste”;
- One 55-gallon metal container for non-hazardous waste;
- One closed 5-gallon bucket of used oil;
- A 30-gallon used oil filter press to collect used oil from the crushed filters;
- A cardboard tube of spent four-foot fluorescent bulbs; and

- There were two 480-gallon double-walled aboveground storage tanks located outside of the shop. One of the tanks contained used oil and the other tank contained used aviation fuel that is sent for recycling.

Aircraft Maintenance Squadron – Corrosion Control Shop

The Corrosion Control Shop contains a large blast booth for large aircraft parts. The blast media waste from this unit is connected to a baghouse hopper located in the Compressor Room. The hopper is connected to an unmarked 55-gallon drum which collects the blast media waste (Photograph #3). Mr. Ritch stated that the container is marked “Hazardous Waste” once it is disconnected from the hopper and the full container is moved to the 90-Day Storage Building. At the time of the inspection, fugitive dust from the collection hopper was present on all surfaces within the room (Photographs #3 and #4). According to the facility personnel, this room is swept/cleaned each Friday and any dust collected is placed into the 55-gallon blast media waste container. On April 8, 2022, Mr. Ritch stated that the large blast booth was shut down following the March 29, 2022, inspection and was investigated to determine the source of the fugitive dust. The investigation determined that the seals on the doors were no longer functional and were replaced. The room was completely cleaned, and the spent blast media/dust/debris was collected, placed in a container, and taken to the 90-Day Storage Building. FDEP’s follow-up inspection on April 8, 2022, inspection indicated that the unit was back in operation and fugitive dust was not observed. The facility indicated that the facility personnel will conduct monthly checks to ensure that all the seals associated with the blasting unit working.

The Corrosion Control shop also contains two small blast booths, one for steel parts and one for aluminum parts (Photograph #5). Each unit is connected to unmarked 30-gallon container which collects the spent blast media (Photograph #6). Mr. Ritch stated that the containers are labeled once they are disconnected from the blaster units and the full containers are moved to the 90-Day Storage Building.

The shop recently installed a 2,000-watt Clean Laser paint removal unit. The waste paint removed by this unit is collected using a built-in vacuum system and the waste paint is collected in a small pan located within the unit (Photograph #7). To date, no waste has been removed from the laser paint removal unit; once removed this waste will be containerized and handled as hazardous waste. The pan was not marked with the word “Hazardous Waste” and an indication of the hazard contents.

A large paint booth is present in this shop (Photograph #8). According to the facility personnel, the small filters are changed quarterly, the large filters are changed every six months, and the box filters are changed annually. Filter changes are coordinated with PAE to ensure the spent filters are properly containerized, marked and the closed containers are moved to the 90-Day Storage Building. There was one closed 55-gallon container of waste paint/solvents. The container was marked “Hazardous Waste” but did not have an indication of the hazard contents.

The inspectors indicated that all baghouse spent blast media IAP container connected to a blasting unit must be closed at all times during accumulation, except when adding, removing, or consolidating waste; marked with the words “Hazardous Waste”; and an indication of the hazards of the contents.

Pursuant to Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.15(a)(5)], which is a condition of the SAA Permit Exemption, a generator must mark or label its containers with

the following: (i) mark with words “Hazardous Waste”; (ii) an indication of the hazards of the contents (examples include, but are not limited to, the applicable hazardous waste characteristic(s) (i.e., ignitable, corrosive, reactive, toxic); hazard communication consistent with the Department of Transportation requirements at 49 C.F.R. part 172 subpart E (labeling) or subpart F (placarding); a hazard statement or pictogram consistent with the Occupational Safety and Health Administration Hazard Communication Standard at 29 C.F.R. 1910.1200; or a chemical hazard label consistent with the National Fire Protection Association code 704).

Pursuant to Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.17(a)(6)], which incorporates Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.255], and is a condition of the LQG Permit Exemption, a LQG generator must maintain and operate its facility to minimize the possibility of a fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water which could threaten human health or the environment.

On June 1, 2022, Mr. Ritch provided photographs of spent blast media containers showing the words “Hazardous Waste” and an indication of the hazards of the contents.

Aircraft Maintenance Squadron (AMS)

AMS Phase ISO Dock has three IAPs: Main ISO Dock, Consolidated Tool Kit (CTK) Workshop, and Wheel and Tire Shop.

Main ISO Dock is located within an enclosed containment room. The inspectors observed the following waste containers:

- One closed 55-gallon metal container of waste cured sealants/debris. The container was marked “Hazardous Waste” but did not have an indication of the hazard contents. The word “Toxic” was added during the inspection;
- One closed 480-gallon double-walled used oil aboveground storage tank, marked “Used Oil”;
- One closed 35-gallon metal container of waste oil/JFB absorbents;
- Two closed 55-gallon metal containers of waste oil/JP8 absorbent;
- One 55-gallon metal container for used oil; empty at the time of the inspection and used to supplement the used oil tank if needed;
- One closed 55-gallon metal container drained used oil filters;
- One closed 55-gallon metal container of spent parts washer fluid. This waste is tested every one to three years and has been documented to be non-hazardous;
- One closed 35-gallon metal container of spent parts washer filters;
- One closed cardboard tube of spent four-foot fluorescent bulbs;
- One closed 5-gallon plastic bucket of spent batteries;
- One closed 5-gallon plastic bucket of spent alkaline batteries;
- One closed 5-gallon plastic bucket of spent lithium-ion batteries; and
- One closed 55-gallon metal drum of universal waste aerosol cans.

The CTK Workshop contained the following containers during the inspection:

- One closed 5-gallon plastic bucket of spent lithium-ion batteries; and
- One closed 55-gallon metal container of waste isopropyl/methanol. The container contained a hazardous waste labeled but was not label with an indication of the hazard of

the contents. The word “Toxic” was added during the inspection. The container was placed on a containment pallet.

The Wheel and Tire Shop – the shop contained two parts washers, one small and a large parts washer for wheel parts. According to the facility staff, parts washer fluid is added as needed but have not yet been replaced the fluid. The inspectors stated that a hazardous waste determination need to be conducted prior to disposal of the fluid. There was a closed 35-gallon metal container of spent parts washer filters (Photograph #9). The container was marked “Hazardous Waste” but was not marked with an indication of the hazards of the contents. The word “Toxic” was added during the inspection.

Pursuant to Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.15(a)(5)(ii)], which is a condition of the SAA Permit Exemption, a generator must mark or label its containers with the following: (ii) an indication of the hazards of the contents (examples include, but are not limited to, the applicable hazardous waste characteristic(s) (i.e., ignitable, corrosive, reactive, toxic); hazard communication consistent with the Department of Transportation requirements at 49 C.F.R. part 172 subpart E (labeling) or subpart F (placarding); a hazard statement or pictogram consistent with the Occupational Safety and Health Administration Hazard Communication Standard at 29 C.F.R. 1910.1200; or a chemical hazard label consistent with the National Fire Protection Association code 704).

Civil Engineering (CE) Squadron

There are two IAPs in the CE Squadron: CE Paint Shop and CE Power Production.

CE Paint Shop – the shop IAP is located outside in a clam shell covered containment pallet and contained the following containers:

- One closed 55-gallon metal container of non-hazardous waste latex paint;
- One 35-gallon polypropylene container containing a spill kit (Photograph #10);
- One closed 55-gallon metal container of hazardous waste flammable paint/solvents (Photograph #10);
- One closed 35-gallon metal container of universal waste aerosol cans. The container had an accumulation start date of February 2, 2022.

CE Power Production had the following containers during the inspection:

- One closed 55-gallon metal container of oily absorbents located within a covered containment pallet;
- A container of used oil filters located within a flammable cabinet. Mr. Ritch did not have a key to access the cabinet;
- One closed double-walled metal 280-gallon aboveground storage tank marked “Used Oil” and “Flammable”;
- One closed double-walled metal 280-gallon aboveground storage tank marked “Used Diesel for Recycling” and “Flammable”; and
- One closed double-walled polypropylene 350-gallon aboveground storage tank of used antifreeze.

Vehicular Maintenance Shop

Vehicle Maintenance Shop maintains the base’s military fleet, including heavy equipment. The waste containers are located on containment pallets. The inspectors observed the following waste containers:

- One approximately 280-gallon metal used oil aboveground storage tank;
- One approximately 300-gallon vertical polypropylene aboveground storage tank for used antifreeze. The tank was marked “Used Coolant for Recycling”;
- One closed 55-gallon metal container of drained used oil filters. The drum was marked “Used Oil Filters”;
- One closed 55-gallon metal container of spent oil absorbents;
- One closed 55-gallon metal container of universal waste aerosol cans. The container had an accumulation start date of February 18, 2022;
- A closed 55-gallon metal container of waste “Mogas” filters marked “Hazardous Waste” and “Flammable”;
- A 30-gallon metal container of used fuel for recycling. The container was fitted with a drain pan for used fuel filters. The container was marked “Hazardous Waste” and “Flammable”;
- A closed 5-gallon plastic bucket of waste lead tire weights. The bucket contained a hazardous waste label but was not labeled with an indication of the hazard. The word “Toxic” was added during the inspection (Photograph #11).

Pursuant to Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.15(a)(5)(ii)], which is a condition of the SAA Permit Exemption, a generator must mark or label its containers with the following: (ii) an indication of the hazards of the contents (examples include, but are not limited to, the applicable hazardous waste characteristic(s) (i.e., ignitable, corrosive, reactive, toxic); hazard communication consistent with the Department of Transportation requirements at 49 C.F.R. part 172 subpart E (labeling) or subpart F (placarding); a hazard statement or pictogram consistent with the Occupational Safety and Health Administration Hazard Communication Standard at 29 C.F.R. 1910.1200; or a chemical hazard label consistent with the National Fire Protection Association code 704).

United States Special Operations Command

United States Special Operations Command is a tenant unit located at MacDill that conducts maintenance on emergency generators and HVAC units. The waste containers were on containment pallets. The following waste containers observed during the inspection:

- One compartmented double-walled aboveground storage tank with a 250-gallon compartment for used oil and a 250-gallon compartment for used antifreeze marked “Used Antifreeze”;
- One closed 55-gallon metal container of non-hazardous spent absorbents;
- One closed 55-gallon metal container of drained used oil filters. The container was marked “Used Oil Filters”;
- One closed 55-gallon metal container of universal waste aerosol cans;
- One closed 55-gallon metal container of waste fuel. The container was marked “Hazardous Waste” and “Flammable.”

Joint Command Support Element (JCSE)

JCSE is a tenant unit located at MacDill. The IAPs are located within the building. All waste containers were on containment pallets. The inspectors observed the following containers:

- One 480-gallon double-walled aboveground used oil storage tank;
- One closed 55-gallon metal container of used antifreeze;
- One closed 55-gallon metal container of non-hazardous oily absorbents;
- Two closed 55-gallon metal container of used non-hazardous absorbent pads;

- One closed 55-gallon metal container of universal waste aerosol cans (Photograph #12); and
- One closed 35-gallon container of drained hazardous used fuel filters (EPA waste code D001 and D018). The container was not marked “Hazardous Waste” and an indication of the hazards of the contents. The “Hazardous Waste,” “Flammable,” and “Toxic” labels were added at the time of the inspection (Photograph #13).

Pursuant to Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.15(a)(5)], which is a condition of the SAA Permit Exemption, a generator must mark or label its containers with the following: (i) the words “Hazardous Waste” and (ii) an indication of the hazards of the contents (examples include, but are not limited to, the applicable hazardous waste characteristic(s) (i.e., ignitable, corrosive, reactive, toxic); hazard communication consistent with the Department of Transportation requirements at 49 C.F.R. part 172 subpart E (labeling) or subpart F (placarding); a hazard statement or pictogram consistent with the Occupational Safety and Health Administration Hazard Communication Standard at 29 C.F.R. 1910.1200; or a chemical hazard label consistent with the National Fire Protection Association code 704).

Records Review

The records reviewed included hazardous waste manifests/associated land disposal restriction (LDR) records, used oil records, waste profiles, universal waste manifests, weekly inspection logs, contingency plan, waste minimization plan, personnel training documents, and job descriptions.

Hazardous waste manifests were reviewed from May 2021 to February 2022. According to reviewed manifests, Heritage Transport, LLC (EPA ID IND058484114), Action Resources, Inc. (EPA ID ALR000007237), and EQ Industrial Services, Inc. (EPA ID MIK435642742) were the registered transporters in 2019 and 2020. The designated treatment, storage and disposal facility was Heritage Thermal Services, Inc. (EPA ID OHD980613541) and Heritage Environmental Services, LLC (EPA ID IND093219012). Since 2021, the waste has been transported by EQ Industrial Services, Inc. (EPA ID MIK435642742), Freehold Cartage, Inc. (EPA ID NJD054126164), and Paquette & Company, Inc. (EPA ID FLD982105884). The designated treatment, storage and disposal facility is US Ecology Tampa, Inc. (EPA ID FLD981932494). No discrepancies were noted in reviewing manifests and Land Disposal Restriction forms. Two 30-day extensions have been granted within the past three years by FDEP. One extension was submitted on March 27, 2020, and the extension was granted on March 30, 2020. The waste manifests documented that the waste was shipped on April 30, 2020. The second extension request was submitted on May 25, 2021, and extension was issued on May 27, 2021. The waste manifests documented that the waste was shipped on June 8, 2021.

FDEP issued an Emergency Treatment Permit to MacDill on January 28, 2022, for the detonation of unexploded ordinance. According to Mr. Ritch, the detonation was completed on April 4, 2022, at Avon Park AFB.

Used oil, drained used oil filters, absorbent pads, unusable fuel, and oil water separator waste are disposed of through Synergy Recycling of Central Florida. Universal waste has been disposed through Six Nations, Inc., of Wayne, Michigan.

Weekly inspections records were reviewed for last three years and appeared timely and accurate, with all required information present. A copy of the combined SPCC/Emergency Contingency Plan was available for review and was complete and up to date. The plan was last updated in March of 2021. A copy of the plan is maintained in the 90-day storage area and well as the on-site offices of PAE. The plan included a Quick Reference Guide. Position descriptions for employees who handle hazardous waste were reviewed and were complete. Employee training (Hazardous Waste Management Annual Update Webcast) is conducted annually and was last conducted on March 17, 2020, February 25, 2021, and February 15, 2022. The 2022 Biennial Report, for waste generated in 2021, was sent to FDEP on February 24, 2022.

11) Closing Conference

MacDill was inspected as a large quantity generator of hazardous waste and a small quantity handler of universal waste. The inspectors discussed the areas inspected, initial points of accumulation containers, accumulation of hazardous waste at the point of generation, operating the facility to minimize potential for sudden or non-sudden releases of hazardous waste, indication of the hazards of the contents, labeling of universal waste, position descriptions/training requirements.

12) Signed

**PARVEZ
MALLICK**

Digitally signed by
PARVEZ MALLICK
Date: 2022.06.02
07:21:12 -04'00'

Parvez Mallick
Inspector and Author of Report

Date

13) Concurrence and Approval

**ARACELI
CHAVEZ**

Digitally signed by
ARACELI CHAVEZ
Date: 2022.06.02 10:15:09
-04'00'

Araceli B. Chavez
Chief
RCRA Enforcement Section

Date

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Compliance Evaluation Inspection photographs were taken by Parvez Mallick of EPA

Canon PowerShot SD980 IS - EPA Property Number S75319



Photograph #1 – 55-gallon universal waste containers in Building 885.



Photograph #2 - 55-gallon container of used oil and coolant in AGE Shop.



Photograph #3 – Unmarked black 55-gallon container of blast media and dust in the baghouse room.



Photograph #4 – Fugitive dust covered empty boxes in the baghouse hopper room.



Photograph #5: Two blast booths for steel and aluminum aluminum parts.



Photograph #6: Unmarked 30-gallon container to collect paint/blasting media chips.



Photograph #7 – Lab 2651 SAA containers.



Photograph #8 – Building 684-A, outside 90-day storage area.



Photograph #9 – 35-gallon container of paint washer filter.



Photograph #10 – 55-gallon metal container of flammable paint and solvent at the CE Paint Shop.



Photograph #11 – 5-gallon container of waste lead tire weight in Vehicular Maintenance Shop.



Photograph #12 – 55-gallon container of universal waste aerosol cans in JCSE.



Photograph #13 – Unmarked 35-gallon container of hazardous used filters in JCSE.