

RCRA Inspection Report

1) Inspector and Author of Report

Alan Newman
Environmental Engineer
Phone: 404-562-8589
newman.alan@epa.gov

U.S. Environmental Protection Agency, Region 4
Enforcement and Compliance Assurance Division
Chemical Safety and Land Enforcement Branch
RCRA Enforcement Section
61 Forsyth Street, S.W.
Atlanta, Georgia 30303

2) Facility Information

U.S. Navy Naval Air Station Jacksonville
6500 Roosevelt Blvd.
Jacksonville, Florida 32212-1192
Duval County

EPA ID#: FL6170024412
NAICS #: 928110 - National Security

3) Responsible Officials

Jenna Kobischen
Installation Environmental Program Director
Naval Air Station Jacksonville (NAS-JAX)
P. O. Box 50
Jacksonville, Florida 32212-0050
Jenna.d.kobischen.civ@us.navy.mil

4) Inspection Participants

Joseph (Jody) Smith, NAS-JAX
Chet Wyckoff, NAS-JAX
Jenna Kobischen, NAS-JAX
Jeff Ward, NAS-JAX
Kenny Hendl, NAS-JAX
Krisopher Harris, NAS-JAX
Jabe Breland, NAS-JAX
Logan Blitch, NAS-JAX
Louis Ballard, NAS-JAX
John Gates, NAS-JAX

Frank LaRocke, NAS-JAX
Joe Diamato, NAS-JAX
Don Eltringham, NAS-JAX
Roy Pickle, NAS-JAX
Andy Forgacs, NAS-JAX
Dayah Orinku, NAS-JAX
Rafael Reid, NAS-JAX
Matt Kershner, FDEP
Emma Sacchitello, FDEP
Alan Newman, USEPA

5) Date of Inspection

January 25, 2024, 8:15 – 4:00 pm and January 26, 2024, 8:15 – 12:00 pm

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; 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.); and Hazardous Waste Permit 72437-HO-013.

Pursuant to Fla. Admin. Code Ann. r. 62-730.020(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 Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.17], a 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 Fla. Admin. Code Ann. r. 62-730.160(1) [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.

7) **Purpose of Inspection**

The purpose of this inspection was to conduct an unannounced compliance evaluation inspection to determine NAS-JAX’s compliance with the conditions of its RCRA Hazardous

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.

Waste Facility Operating Permit 72437-HO-013, the applicable requirements of RCRA and the corresponding Florida regulations. This was an EPA lead inspection.

8) Facility Description

U.S. Navy Naval Air Station Jacksonville (hereinafter as “NAS-JAX” or the “facility”) is a naval base for the operation of patrol aircraft, located in Jacksonville, Duval County, Florida. NAS-JAX has been operating at its current location since 1917. The property consists of approximately 3,800 acres and employs approximately 13,000 military and 10,000 civilian people, operating seven days a week 24 hours a day.

NAS-JAX operates a large industrial complex for the maintenance and repair of aircraft airframes and engines. NAS-JAX has several tenants that include aircraft maintenance, repair, stripping, painting and vehicle maintenance and repair. There is a wide range of support shops such as plating shops, paint shops, and equipment shops. Several helicopter squadrons, two C130 squadrons, P3 Squadrons and P8 Squadrons are also stationed at the NAS-JAX. There are numerous service-industry and retail businesses used by stationed personnel including medical facilities, veterinary facilities, golf course, bowling alley, hobby shops, beauty salon, a Navy Exchange, etc.

Wastes from each shop are accumulated at various points throughout the site. Some of these sites are 90-days or less accumulation sites and some are satellite accumulations areas (SAAs). NAS-JAX provided a list of waste profiles and a list of hazardous waste accumulation areas. NAS-JAX was issued a RCRA Operating/Post-Closure/Corrective Action Permit Number 72437-HO-013 on September 13, 2019, to operate two container storage units and one miscellaneous unit, to continue post-closure care of one unit, and to continue facility-wide corrective action. In addition, the facility operates as a large quantity generator (LQG) of hazardous waste, a used oil generator, and a small quantity handler of universal waste (SQHUW).

9) Previous Inspection History

FDEP has conducted annual RCRA CEIs at the subject facility since at least 2010. On June 15, 2023, FDEP conducted the most recent RCRA CEI at the subject facility and found two apparent violations of RCRA’s requirements for failure to close and label containers in a SAA. NAS-JAX subsequently provided documentation that the apparent violations had been corrected, and FDEP determined that a follow up visit would be unnecessary.

10) Opening Conference

On January 25, 2024, EPA inspector Alan Newman, accompanied by Florida inspectors Emma Sacchitello and Matthew Kershner, arrived at NAS-JAX at approximately 9:00 am. Jody Smith, Hazardous Waste Manager, immediately received the inspectors. Jody Smith, and the inspectors were joined by Jeff Ward, Kris Harris, and Kenny Hendl, for the opening conference. The inspectors introduced themselves, showed their credentials to Jody Smith, and explained the purpose of the visit.

The inspectors described the anticipated use of equipment (digital camera) during the inspection and provided a request for records. 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 company's ability, pursuant to 40 C.F.R. § 2.203, to assert a business confidentiality claim for information submitted to EPA. The company did not assert a business confidentiality claim for the waste areas.

Jody Smith 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 Jody Smith led the inspectors on a tour of the Facility operations.

11) Inspection Observations

NAS-JAX operates two FDEP permitted hazardous waste container storage buildings, building 144 and building 762 (Photographs 1-13, 25-27). On the day of the inspection, NAS-JAX was not storing any hazardous waste in Building 762 (Photographs 25-27). Building 144 is constructed with a concrete base, metal supports, and metal walls and roof. Building 144, the main permitted hazardous waste storage unit, is permitted to store hazardous waste codes D001 through D040, D042, D043; F001 through F009, F019; P001, P003, P004, P008, P012, P015, P016, P022, P029, P030, P042, P046, P048, P050, P059, P063, P075, P088, P098, P104, P105, P106, P119, P122, P123, P204; U002, U003, U004, U010, U012, U019, U021, U022, U029, U030, U031, U034, U035, U041, U042, U044, U045, U056, U058, U060, U061, U069 through U072, U075, U077 through U082, U095, U102, U103, U108, U109, U112, U115, U117, U118, U121, U122, U127, U129, U134, U138, U140, U144, U150, U151, U154, U158 through U162, U167, U169, U170, U188, U190, U192, U196, U201, U202, U205, U210, U211, U213, U220, U226, U227, U228, U234, U235, U239, U248, U278, U359 and U404.

Each container is screened for the permitted waste codes before it is placed into the building. Containers with codes not allowed by the permit are kept in the CAA and are not placed into storage.

NAS-JAX was storing multiple containers in eight divided storage cells separating waste by type including: Paint Wastes (Cell J-1-C-A); Acid Wastes (J-1-C-B); Corrosive Basic Wastes (J-1-C-C); Solvent Wastes (J-1-C-D); General Wastes (J-1-C-E); Corrosive Basic (J-1-C-F); Corrosive Wastes (J-1-C-G); and Corrosive Basic Wastes (J-1-C-H). Containers are inspected weekly. Each container was in good condition, labeled, closed, and provided with adequate aisle space (Photographs 1-13). Every container was labeled with an accumulation start date of less than one year. The oldest accumulation start date was August 22, 2023.

The permitted capacity of Building 144 is 13,365 gallons. The volume of waste on the day of the inspection stored in this building was far less than the permitted capacity.

The inspection team noted that the signs on the outside of Building 144 and Building 762 (Hazardous Waste Storage Facility(ies) (HWSF)) were faded. NAS-JAX replaced the faded signs and documented compliance with an email which contained photographs of new signs on January 29, 2024.

Pursuant to Permit application for Permit Number 72437-HO-013, permit condition Part II Condition 8, Permit Application Part II A-4a(4) Warning Signs [264.14(c)]: warning signs, visible from a distance of 25 ft, are posted at each entrance to Buildings 144 and 762 and the legend “Danger — Unauthorized Personnel Keep Out”. In addition, “No Smoking Within 50 Feet” signs, visible from a distance of 50 ft, are posted. “No Smoking or Open Flame” signs are posted inside the HWSFs.

Pursuant to Florida Statutes 403.272(1)(c), it is unlawful for any hazardous waste generator, transporter, or facility owner or operator to fail to comply with a permit.

NAS-JAX operates building 147 for equipment storage and office space. Adjacent to this building, NAS-JAX stored non-hazardous waste in a fenced in area behind this building. There were no issues noted in this area.

Central Accumulation Areas (CAA):

NAS-JAX manages a hazardous waste CAA in multiple areas throughout the base. On the concrete pad surrounding hazardous waste container storage building 144, NAS-JAX operated a CAA for storage of hazardous waste and universal waste (Photographs 14-24). The CAA is equipped with an internal communications or alarm system capable of providing immediate emergency instruction to facility personnel; it is equipped with a device capable of summoning emergency assistance from local police departments, fire departments, or state or local emergency response teams; it is equipped with portable fire extinguishers, fire control equipment, spill control equipment, and decontamination equipment; and it is equipped with water to supply water hose streams, or foam producing equipment, or automatic sprinklers, or water spray system. Each container was in good condition, labeled, and closed. The inspection team noted that the concrete slab in this area was cracked. NAS-JAX should ensure that any spill of hazardous waste in this area does not migrate through the concrete cracks into the soils below.

On the day of the inspection, amongst the hundreds of containers the inspection team noted one 55-gallon container of D006 hazardous waste dated October 16, 2023, in Row J-1-R-H and one 275-gallon tote of D001/D003/D004/D006/D007/D008 hazardous waste that was dated October 25, 2024, against wall of permitted storage area. Both of these containers had an accumulation start date that was older than 90 days (Photographs 14-15). Both of these containers were immediately moved into the permitted storage area.

Pursuant to Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.17(b)], a 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].

The inspection team noted multiple containers of universal waste lamps and batteries in this CAA (Photographs 21-24). These containers were in good condition, labeled, and closed. The oldest accumulation start date was February 15, 2023.

Multiple CAAs and Satellite Accumulation Areas (SAAs)

There are numerous units, contractors, and smaller commands that operate under the NAS-JAX base command. The Fleet Readiness Center Southeast (FRCSE) is the largest tenant command at NAS-JAX. The inspection team toured multiple CAAs and SAAs, which were managing hazardous waste, universal waste lamps and batteries, and used oil, including these areas: Building 101R [CAA], Building 78 - WWTP #2 (Area 23) [CAA], Building 101 - Component Paint Shop (Area 9)[CAA], Mega Center 15 [SAA], Mega Center 21 [SAA], Hanger 124 (Area 48) [CAA/SAA], Building 794 – Electroplating Shop (Area 39) [CAA/SAA], Building 797 Engine Machine Shop (Area 36) [CAA/SAA], Waste Site #2 [SAA], Hanger 140 Area 4 [CAA/SAA], Mega Center 18 [SAA], Fiberglass Composite Shop Baghouse (Area 22) [CAA], and Building 2080 - Hospital Pharmacy [Pharm] (Photographs 28-50).

In the Engine Machine Shop's Area 36O SAA, the inspection team noted one 55-gallon container of hazardous waste that was not closed (Photographs 42-43). Facility personnel closed this container during the inspection.

Pursuant to Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.15(a)(4)], which is a condition of the SAA Permit Exemption, a generator is required to keep containers of hazardous waste closed at all times during accumulation, except when adding, removing, or consolidating waste; or when temporary venting of a container is necessary for the proper operation of equipment, or to prevent dangerous situations, such as build-up of extreme pressure.

In the Engine Machine Shop's Area 36C9 CAA, the inspection team noted one 55-gallon container of hazardous waste with a warped lid that it could not be closed (Photographs 44-45). The facility documented that they had returned to compliance in an email dated February 5, 2024.

Pursuant to Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.17(a)(1)(iv)(A)], which is a condition of the LQG Permit Exemption, (A) a container holding hazardous waste must always be closed during accumulation, except when it is necessary to add or remove waste.

The inspection team noted two metal lockers outside of Building 797. The secondary containment in these lockers had accumulated dirt and debris (Photographs 47-49). The inspection team recommends that the secondary containment area be cleared of all dirt and debris to be able to detect potential leaks from containers stored in these lockers.

In Building 78, wastewater treatment plant #2, the inspection team noted two large containers used to accumulate hazardous waste emptied from the filter press and transport it for transfer into the roll off dumpster (Photograph 32). There was no waste accumulating in these

containers on the day of the inspection, but the facility is reminded that containers of hazardous waste managed in SAAs must be labeled with the words “Hazardous Waste” and with an indication of the hazard of the contents. This was noted as an area of concern. NAS-JAX emailed photograph documentation that these containers were correctly labeled.

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 is required to mark or label its containers (i) with the words “Hazardous Waste” and (ii) with an indication of the hazards of the contents.

Facility Areas for Universal Waste Management:

The inspectors observed dozens of containers of universal waste batteries and lamps throughout the facility during the inspection. Generally, universal waste is co-located with CAAs and SAAs. At each accumulation location, the containers were in good condition, labeled, and closed. Each container was labeled with an accumulation start date of less than one year.

12) 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 August 2023.

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, and the Local Emergency Planning Committee.

The plan lists the names and emergency telephone numbers for persons identified as emergency coordinators. James Taylor is listed as the primary emergency coordinator, and the other individuals are listed in the order in which they will assume responsibility as alternates. Mr. Taylor is retiring soon after the inspection. The inspection team recommends that NAS-JAX update the contingency plan and the quick reference guide with new primary emergency coordinator, and re-distribute those documents.

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 the police department, fire department, hospital, State and local emergency response teams and the Local Emergency Planning Committee in September 2023.

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 NAS Jacksonville Fire Department Personnel, NAVFAC SE PWD Installation Environmental Program Director, NAVFAC SE Hazardous Waste Program Manager, NAVFAC SE HWSF Supervisor, HWSF Operator, Environmental Protection Specialist, HWSF Operator, Hazardous Waste Disposer, and Miscellaneous Unit at Hangar 101S and Polishing Pond Post-Closure Unit Inspectors. Each description included the requisite skill, education, or other qualifications, and duties of facility personnel assigned to that position.

NAS-JAX 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 in 2023.

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 2023. Hazardous waste manifest records show that the most recent shipment was made on January 23, 2024.

Weekly Inspection Records:

The inspectors reviewed NAS-JAX's available records of inspections of the hazardous waste central accumulation area (CAA) since February 13, 2023. The inspection log includes a checklist to record observations about leaking containers and for deterioration of containers caused by corrosion or other factors. The inspection log includes a checklist to record observations about sufficient aisle space, visible container labels, legible container labels, containers in good physical condition – no severe rusting, building, or structural defects, closed lids and bungs, no material on outside of container, container storage time, housekeeping, emergency communication, fire extinguisher, spill response kit, and salvage drums. The records include the date and time of the inspection and the name, signature and initials of the employee

conducting the inspection. Employees periodically record inspection observations and subsequent follow-up actions on the inspection log.

13) Closing Conference

The inspectors conducted the exit meeting where the inspectors stated their preliminary conclusions of the inspection. NAS-JAX agreed to provide: 1. CEI records for FRC, 2. Training records for FRC, 3. Photographs at FRC, and 4. The most recent groundwater monitoring report for the Polishing Pond by February 15, 2024. Between January 25, 2024, and February 5, 2024, NAS-JAX personnel provided all requested records in seven emails to Alan Newman and Emma Sacchitello.

14) List of Attachments

Attachment 1 – Photo Log: 50 Photos taken January 25-26, 2024; Photos taken by Alan Newman and NAS-JAX Personnel.

15) Signed

ALAN NEWMAN Digitally signed by ALAN NEWMAN
Date: 2024.04.05 13:44:15 -04'00'

Alan Newman
Environmental Engineer

16) Concurrence

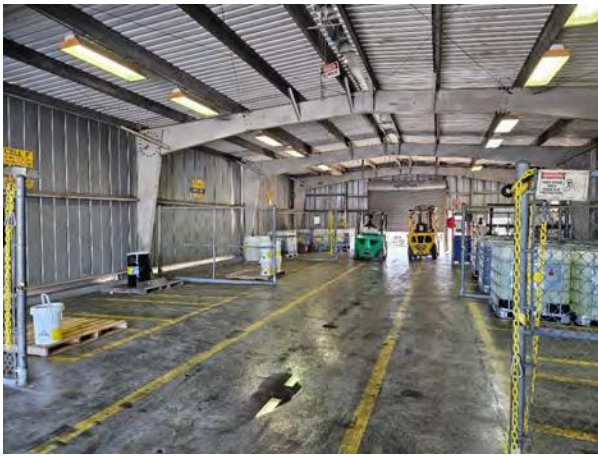
LAURIE DIGAETANO Digitally signed by LAURIE DIGAETANO
Date: 2024.04.05 13:49:26 -04'00'

For Araceli B. Chavez
RCRA Enforcement Section

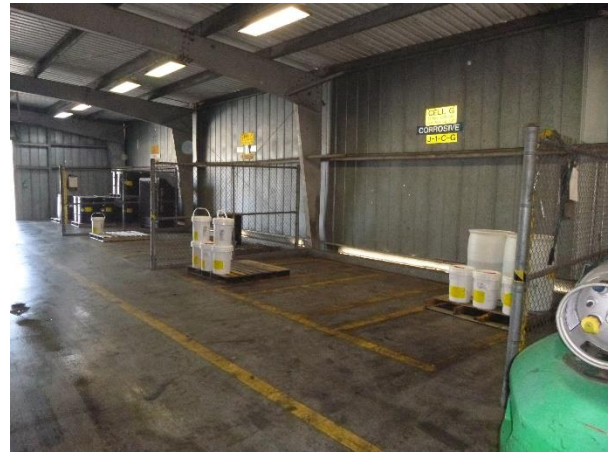
Appendix 1

Photograph Log:

50 Photos taken January 25-26, 2024
Photos taken by Alan Newman and NAS-JAX Personnel



Photograph 1: Building 144 TSD.



Photograph 4: Building 144 TSD.



Photograph 2: Building 144 TSD.



Photograph 5: Building 144 TSD.



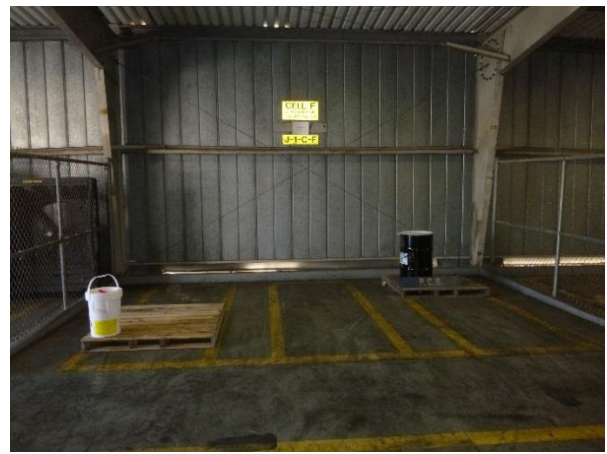
Photograph 3: Building 144 TSD.



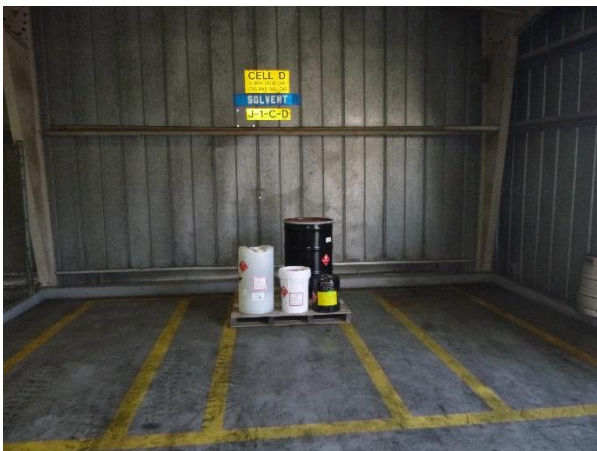
Photograph 6: Building 144 TSD.



Photograph 7: Building 144 TSD.



Photograph 10: Building 144 TSD.



Photograph 8: Building 144 TSD.



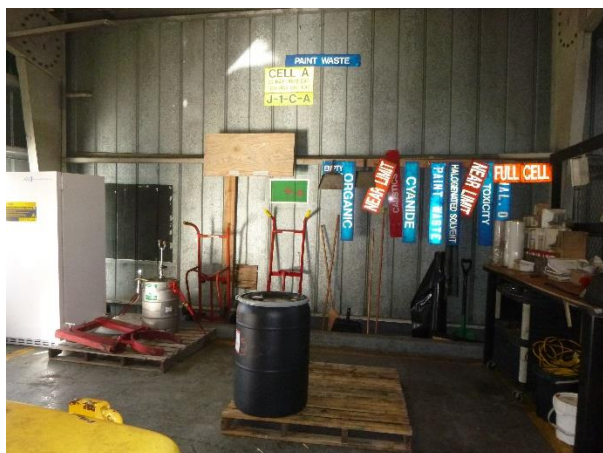
Photograph 11: Building 144 TSD.



Photograph 9: Building 144 TSD.



Photograph 12: Building 144 TSD.



Photograph 13: Building 144 TSD.



Photograph 15: Building 144 CAA.



Photograph 14: Building 144 CAA.



Photograph 16: Building 144 CAA.



Photograph 17: Building 144 CAA.



Photograph 18: Building 144 CAA.



Photograph 19: Building 144 CAA.



Photograph 20: Building 144 CAA.



Photograph 21: Building 144 CAA.



Photograph 22: Building 144 CAA.



Photograph 23: Building 144 CAA.



Photograph 24: Building 144 CAA.



Photograph 25: Building 762 TSD.



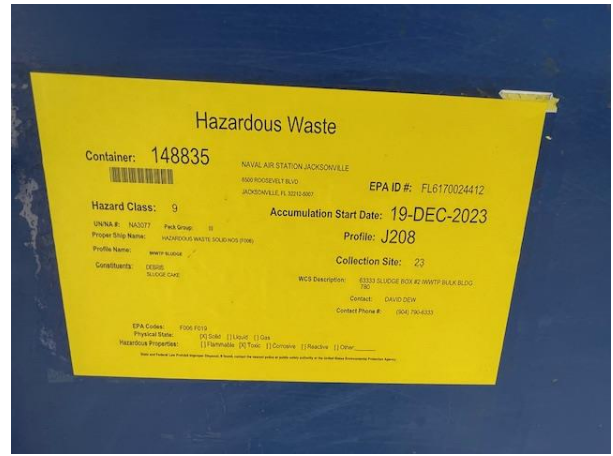
Photograph 26: Building 762 TSD.



Photograph 27: Building 762 TSD.



Photograph 28: Building 101R.



Photograph 31: CAA Sludge Box WWTP #2.



Photograph 29: Building 101R.



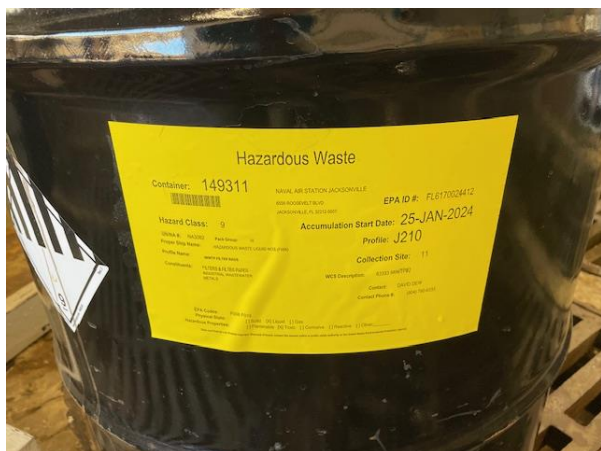
Photograph 32: WWTP #2 Filter press and sludge transfer containers.



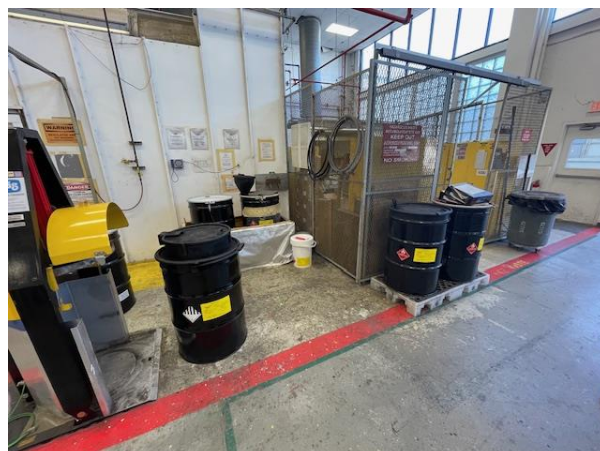
Photograph 30: CAA Sludge Box WWTP #2.



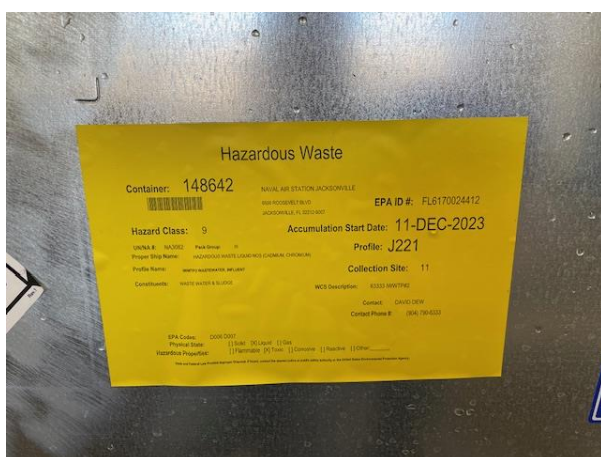
Photograph 33: FRC CAA and SAAs.



Photograph 34: FRC CAA and SAAs.



Photograph 37: FRC CAA and SAAs.



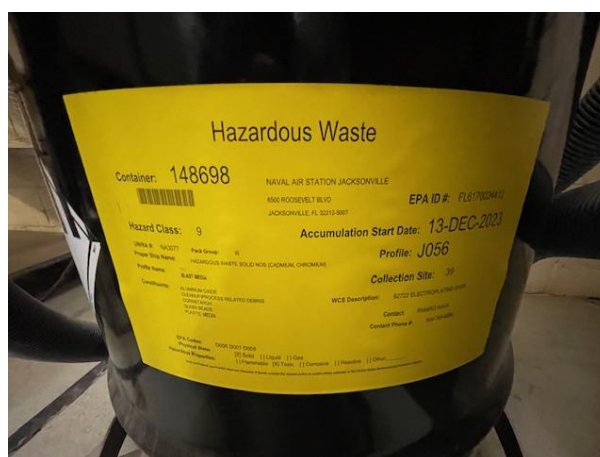
Photograph 35: FRC CAA and SAAs.



Photograph 38: FRC CAA and SAAs.



Photograph 36: FRC CAA and SAAs.



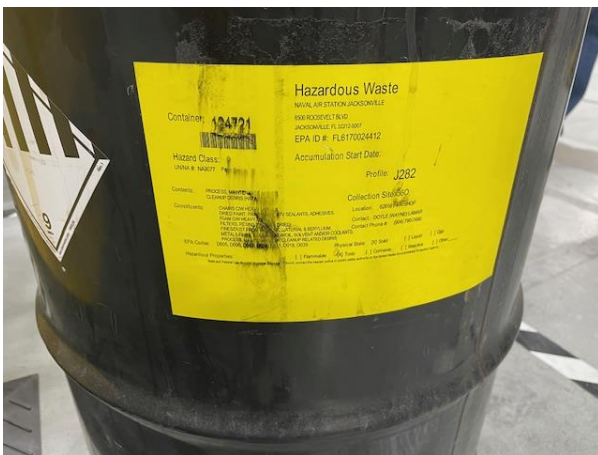
Photograph 39: FRC CAA and SAAs.



Photograph 40: Plating shop.



Photograph 43: Engine Machine Shop SAA 36O.



Photograph 41: Plating Shop SAA.



Photograph 44: Engine Machine Shop CAA 36C9.



Photograph 42: Engine Machine Shop SAA 36O.



Photograph 45: Engine Machine Shop CAA 36C9.



Photograph 46: FRC CAA and SAAs.



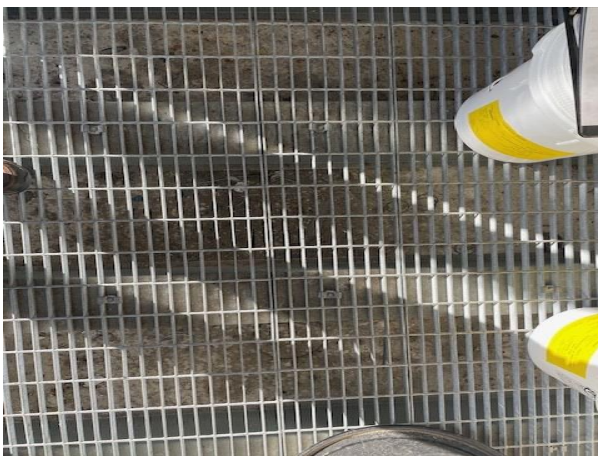
Photograph 49: Building 767 Lockers.



Photograph 47: Building 767 Lockers.



Photograph 50: Baghouse accumulation.



Photograph 48: Building 767 Lockers.