



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

MAR 18 2020

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Lieutenant Commander Mark Justice
Naval Air Station Whiting Field
7183 Langley Street, Building 1416
Milton, Florida 32570

SUBJ: Resource Conservation and Recovery Act (RCRA) Compliance Evaluation Inspection (CEI)
Naval Air Station Whiting Field
EPA ID Number: FL2170023244

Dear Lieutenant Commander Justice:

On February 12, 2020, the U.S. Environmental Protection Agency, along with the Florida Department of Environmental Protection (FDEP) conducted a CEI at the Naval Air Station Whiting Field, located in Milton, Florida to determine the facility's compliance status with RCRA and applicable regulations.

Enclosed is the EPA RCRA inspection report which indicates that a deficiency of RCRA was discovered during the inspection. A copy of this report has been forwarded to the FDEP for follow-up and further review.

If you have any questions regarding this matter, please contact William Kappler, of my staff, by phone at (404) 562-8498 or by email at kappler.william@epa.gov.

Sincerely,

A handwritten signature in blue ink that reads "Alan A. Annicella".

Alan A. Annicella

Chief

Land, Asbestos and Lead Section

Chemical Safety and Land Enforcement Branch

Enclosure

cc: Mr. Jeff Kissler, Naval Air Station Whiting Field (electronic copy)
Mr. Russell Sullivan, NW District, FDEP (electronic copy)

RCRA Inspection Report

1) Inspector and Author of Report

William Kappler
Physical Scientist
Enforcement Compliance and Assurance Division
Environmental Protection Agency, Region 4, AFC - 10th Floor
61 Forsyth Street
Atlanta, Georgia 30303
(404) 562-8498

2) Facility Information

Naval Air Station Whiting Field
7183 Langley Street, Building 1416
Milton, Florida 32570
Santa Rosa County

EPA ID No.: FL2170023244

3) Responsible Officials

Lieutenant Commander Mark Justice
Naval Air Station Whiting Field
Naval Facilities Engineering Command
7183 Langley Street, Building 1416
Milton, Florida 32570
(850) 623-7260
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Inspection Participants

Lieutenant Commander Mark Justice, Naval Air Station Whiting Field
Jeff Kissler, Naval Air Station Whiting Field
Johnathan Stewart, Naval Air Station Whiting Field
Wes Hamill, Naval Air Station Whiting Field
Aaron Mitchell, Naval Air Station Whiting Field
Sean Foote, Naval Air Station Whiting Field
Charles Egri, Naval Air Station Whiting Field
Brook Boyd, Naval Air Station Whiting Field
Brian Holmes, Dyncorp
James Mullins, Dyncorp
Walter Franklin, Dyncorp
Monica Hardin, Florida Department of Environmental Protection, Southwest District
William Kappler, Environmental Protection Agency, Region 4

5) **Date and Time of Inspection**

February 12, 2020, at 9:10 a.m.

6) **Applicable Regulations**

Chapter 403 of the Florida Statutes, Fla. Stat. § 403.702 *et seq.*, [Resource Conservation and Recovery Act Sections 3002 - 3005, (42 U.S. Code - Annotated U.S.C.A. 6925 and 6927)], the Florida Hazardous Waste Regulations 62.710.210 -.901, and 62-730 *et seq.* of the Florida Administrative Code Annotated (Fla. Admin. Code Ann.) [40 Code of Federal Regulations (C.F.R.) Parts 260-270, 273, and 279], and the Florida Department of Environmental Protection Hazardous and Solid Waste Amendments (HSWA) Permit Number 72442-HO-004 for corrective action.

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 Inspection**

On February 12, 2020, inspectors from the U.S. Environmental Protection Agency, Region 4, and the Florida Department of Environmental Protection (FDEP) conducted an unannounced compliance evaluation inspection (CEI) at the Naval Air Station Whiting Field, (hereinafter, "NASWF" or the "facility") to determine its compliance status with the RCRA and the State of Florida regulations. This was an EPA-lead inspection. Inspectors arrived at NASWF and were greeted by facility representatives. Inspectors were escorted to a conference room for an entrance briefing. Inspectors introduced themselves, showed credentials, exchanged business cards, and explained the purpose of the visit. The entrance briefing included a general facility description, a discussion of the process operations and the locations of the RCRA regulated units for inspection, and a discussion of the RCRA records for review. The EPA inspector provided a written list to the facility of the RCRA records for review.

8) **Facility Description**

NASWF is located at 7183 Langley Street, Building 1416, Milton, Santa Rosa County, Florida. The facility is located on 3,915 acres, employs 3,150 people (approximately 1,200 student naval pilots), and operates 24 hours per day, seven days per week. The main maintenance and repair operations on aircraft are conducted in several buildings consisting of several hundred of thousand square feet. The City of Milton provides domestic waste services and potable water is provided by NASWF's potable water plant. The primary NAICS code for the facility is 928110. NASWF is a large quantity generator (LQG) of hazardous waste and a small quantity handler of universal waste (SQHUW).

9) **General Process Description**

NASWF is a United States Naval Air Station located near Milton, Florida, in central Santa Rosa County, and is one of the Navy's primary pilot training bases. The base functions as a training center for naval pilots on fixed or rotary wing aircraft. NASWF provides training for student pilots from U.S. Navy, U.S. Marine Corps, Coast Guard, and Air Force, as well as several allied

nations. The facility conducts maintenance and repair operations on fixed wing and rotary aircraft.

NASWF is comprised of two airfields sharing a common support base. The North Field is the primary flight training operations for fixed-wing aircraft. Student pilots complete the T-6B Joint Primary Aircraft Training System syllabus. The United States Navy, Marine Corps, and Coast Guard student pilots operate the TH-57 Sea Ranger, primarily at South Field. Reportedly, upon completion of the syllabus students are authorized to become designated Naval Aviators and assigned to their respective Fleet Replacement Squadron. The facility is operated primarily by a main or prime onsite contractor. Dyncorp is the contractor for the South Field (rotary aircraft) and for the North Field areas (fixed wing aircraft). The Public Works/Environmental Division is staffed by federal employees. Mr. Jeff Kissler is the Installation Environmental Program Director, Mr. Jonathan Stewart is the Hazardous Waste Program Manager, and Wes Hamill is the Deputy Public Works Officer.

NASWF is a large quantity generator (LQG) of hazardous waste (HW), a small quantity handler of Universal Waste (UW) batteries and lamps and a generator of used oil. NASWF is regulated under the RCRA Corrective Action program derived from the Hazardous and Solid Waste Amendments (HSWA). The FDEP has issued a permit (Number 72442-HO-004) which sets out the corrective action requirements for this site.

Training Air Wing FIVE hosts 141 T-6 Texan II aircraft for fixed-wing training and 120 TH-57 helicopters for rotary wing training. The airfield can accommodate most Department of Defense aircraft and conduct more than 100,000 helicopter and fixed-wing flights each year. Military passenger flights are available through the air terminal, which processes about 13,000 passengers each year. The department also provides air traffic control services, air terminal and servicing functions for transient aircraft, field arresting gear, and ground electronics maintenance. Airfield and Air Operations were not evaluated during this inspection.

NASWF airspace is insufficient to manage or handle the air traffic associated with more than 260 aircraft at the two airfields. As a result, NASWF utilizes 13 other Navy Outlying Landing Fields.

10) Previous Inspection History

NASWF was last inspected by the FDEP for compliance with the RCRA and the State of Florida regulations on July 22, 2015. Non-compliance issues were observed. The facility was cited for 40 C.F.R. § 273.35(a) – exceeding the universal waste one-year accumulation period for universal waste batteries and 40 C.F.R. § 262.34(c)(1)(ii) - satellite accumulation containers to be marked either with the words “hazardous waste” or with other words that identify the contents of the containers.

NASWF was last inspected by the EPA, Region 4 for compliance with the RCRA and the State of Florida regulations on July 22, 2015. Non-compliance issues were observed. The facility was cited for 40 C.F.R. § 273.35(a) – exceeding the universal waste one-year accumulation period for universal waste batteries and 40 C.F.R. § 262.34(c)(1)(ii) - satellite accumulation containers to be marked either with the words “hazardous waste” or with other words that identify the contents of the containers.

11) **Findings**

The information in this RCRA inspection report is based on the EPA's February 12, 2020, RCRA CEI.

Building 3156 - 90-Day or Less Accumulation Area

Charles Egri and Brook Boyd met inspectors at Building 3156. Mr. Egri is the manager for this area and Ms. Boyd works in the water program. Mr. Egri is responsible for picking-up and transporting containers from the satellite accumulation areas to the 90-Day or Less Accumulation Area (90-Day Area). The 90-Day Area is surrounded by a chain-link fence and a locked gate. Inspectors observed a sign on the fence with the words "hazardous waste storage area". The 90-Day Area is constructed with a sloped concrete ramp and concrete floor with a three to four-inch concrete berm. The 90-Day Area is constructed with three concrete bays, each with a sloped floor and dead-end concrete containment area. The bays consist of a Flammables Bay, a Poisons Bay, and a Universal Waste/Non-Hazardous Waste Bay. Inspectors observed an emergency eye wash and shower station, a flammable locker with emergency spill control and personal protective equipment, and a phone to contact the emergency response team. NASWF has an onsite fire department.

Flammables Bay

Inspectors observed five 55-gallon containers, one 30-gallon container, one 10-gallon container, and four cardboard boxes accumulating hazardous waste on containment pallets. The containers were closed, labeled with the words hazardous waste, labeled with an indication of the hazards of the contents, marked with the waste codes, and marked with the dates February 6, 2020, February 7, 2020, January 14, 2020, January 14, 2020, January 13, 2020, January 9, 2020, and January 23, 2020. Inspectors observed the four cardboard boxes were stacked two high. The two bottom boxes were not clearly labeled or marked with the words hazardous waste due to the positioning of the two top boxes. Mr. Egri repositioned the boxes one-high and inspectors observed the boxes were closed, labeled with the words hazardous waste, labeled with an indication of the hazards of the contents, marked with waste codes, and marked with the dates January 30, 2020 (photographs 1 and 2).

Poisons Bay

Inspectors observed 24 55-gallon containers and one 10-gallon container accumulating hazardous waste on containment pallets. The containers were closed, labeled with the words hazardous waste, labeled with an indication of the hazards of the contents, marked with waste codes, and each marked with a date in January 2020 or February 2020.

Universal Waste/Non-Hazardous Waste Bay

Inspectors observed one eight-foot box, three four-foot boxes, and five used mercury lamp boxes, four five-gallon containers of used batteries, and a pallet accumulating 12 used aircraft batteries. Inspectors observed the containers were closed, labeled with the words universal waste, and marked with the dates less than one year. Inspectors recommended that the dates marked on the container labels should be more legible.

Building 2837 and Building 2991

The buildings are used to store empty containers and for the storage of non-hazardous waste. In Building 2837, inspectors observed one 275-gallon container accumulating aqueous foam residuals. The container was closed and labeled with the words non-hazardous waste.

South Field Area

The student pilots operate the TH-57 Sea Ranger in this area. The rotary aircraft are repaired and maintained in several buildings. Hazardous waste is accumulated in 3-gallon 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. The 3-gallon container of hazardous waste is transferred to a satellite accumulation area (SAA) and emptied into a 55-gallon container in a flammable locker at the end of an eight-hour shift.

Building 1406 – Rotary Wing Maintenance

Unscheduled maintenance is conducted on the aircraft on the north end of this building. Brian Holmes is the Environmental and Safety Manager for the rotary wing maintenance area. Mr. Holmes is given annual hazardous waste refresher training and gives annual hazardous waste refresher training to staff.

Hazardous waste is accumulated in 55-gallon containers in flammable lockers. Inspectors observed two 55-gallon containers accumulating hazardous waste in separate flammable lockers. One 55-gallon container was positioned under a compactor accumulating waste rags and one 55-gallon was accumulating waste solvent. The containers were closed, labeled with the words hazardous waste, labeled with an indication of the hazards of the contents, and marked with waste codes.

Scheduled maintenance is conducted on the aircraft on the south end of this building. Inspectors observed several flammable lockers in this area accumulating hazardous waste and raw product.

Inspectors observed three 55-gallon containers accumulating hazardous waste in separate flammable lockers. One 55-gallon container was positioned under a compactor accumulating spent paper wipes one 55-gallon for aerosol cans, and one 55-gallon was accumulating waste solvent. The containers were closed, labeled with the words hazardous waste, labeled with an indication of the hazards of the contents, and marked with waste codes.

DynCorp records the quantity of waste, the date, the time, the work center, and the name of the person generating the waste on a log for the north and south end SAAs.

Building 3024 – Paint Booth and Corrosion Control

Small parts are touched up with paint in a small parts paint booth. Corrosion control is also conducted on parts using an Alodine pen. Paint booth filters are changed approximately each quarter and accumulated in one cubic yard or 55-gallon containers.

Inspectors observed one 5-gallon container accumulating waste paint, one 30-gallon container was accumulating waste paint dust, and one vacuum cleaner was accumulating waste paint dust. The containers were closed, labeled with the words hazardous waste, labeled with an indication of the hazards of the contents, and marked with waste codes.

Inspectors observed one 55-gallon container accumulating waste tape and paint contaminated debris positioned under a compactor (photograph 3). The container was closed, labeled with the words hazardous waste, labeled with an indication of the hazards of the contents, and marked with waste codes.

Inspectors observed two 55-gallon containers accumulating hazardous waste in separate

flammable lockers. One 55-gallon container was accumulating waste paint liquid (D001 and D007) and one 55-gallon container was accumulating waste paint stripper (D006). The containers were closed, labeled with the words hazardous waste, labeled with an indication of the hazards of the contents, and marked with waste codes.

Mid Field Area

Building 1454 – GSE Maintenance Building

James Mullins is the Hazmat Coordinator. Maintenance on parts and equipment is conducted in this building. Used oil, used oil filters, waste antifreeze, and spray cabinet sludge is generated from the process operation.

Inspectors observed a 50-gallon hot water spray cabinet that uses an aqueous solution to clean engine parts, aviation parts, and ground support equipment during routine maintenance operations. Inspectors observed three 5-gallon containers accumulating hazardous waste in separate flammable lockers. One 5-gallon container was accumulating waste aerosol cans, one 5-gallon of waste fuel, and one 5-gallon container of waste paint. The containers were closed, labeled with the words hazardous waste, labeled with an indication of the hazards of the contents, and marked with waste codes.

Inspectors observed one 30-gallon container accumulating used plastic blast media (D006 and D007) next to a media blaster. The container was closed, labeled with the words hazardous waste, labeled with an indication of the hazards of the contents, and marked with waste codes.

Also observed was one 55-gallon container in a flammable locker accumulating off-spec. F-24 jet fuel (D001). The container was closed, labeled with the words hazardous waste, labeled with an indication of the hazards of the contents, and marked with waste codes.

Building 3042 – GSE Maintenance

Used oil, used oil filters, waste antifreeze, and part washer sludge is accumulated in a three-sided metal building located behind the Building 3042. The building is surrounded by a chain-link fence and a locked gate. Inspectors observed a sign on the fence with the words “Flammable Emergency Contact Call 911”. Inspectors observed a 30-gallon container accumulating part washer sludge in this building. The container was closed and labeled with the words non-hazardous waste.

North Field Area

The North Field is the primary flight training operations for fixed-wing aircraft. Student pilots complete the T-6B Joint Primary Aircraft Training in this area. The fixed-wing aircraft are repaired and maintained in several buildings. Hazardous waste is accumulated in 3-gallon 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. The 3-gallon container of hazardous waste is transferred to a satellite accumulation area (SAA) and emptied into a 55-gallon container in a flammable locker at the end of an eight-hour shift. The point source coordinators (managers) are given annual RCRA refresher training. The managers give training to their staff handling hazardous waste in the SAAs.

Building 3227A – Tire Shop

Walter Franklin is the Environmental Health and Safety Coordinator. Aircraft wheels and parts

are cleaned in a hot water spray cabinet generating a sludge. Inspectors observed two 55-gallon containers accumulating waste rags (D006 and D007) and waste aerosol cans. The containers were closed, labeled with the words hazardous waste, labeled with an indication of the hazards of the contents, and marked with waste codes.

Inspectors also observed two 55-gallon containers in separate flammable lockers accumulating waste aircraft wheel sludge (D006) and waste alcohol (D001). The containers were closed, labeled with the words hazardous waste, labeled with an indication of the hazards of the contents, and marked with waste codes.

Destructive Test Room

Inspectors observed one 55-gallon container in this room accumulating waste rags and wipes from testing and wiping process operations (D006). The container was closed, labeled with the words hazardous waste, labeled with an indication of the hazards of the contents, and marked with waste codes.

Located in a small cabinet the inspectors observed a 5-gallon container accumulating waste cleaner/detergent (D006). The container was closed, labeled with the words hazardous waste, labeled with an indication of the hazards of the contents, and marked with waste codes.

Building 3227B – Corrosion Control

Alodine process applications are conducted in the corrosion control room. Inspectors observed a 55-gallon container in a flammable locker accumulating waste chromic acid (D002, D006, and D007). The container was closed, labeled with the words hazardous waste, labeled with an indication of the hazards of the contents, and marked with waste codes.

Inspectors also observed a 55-gallon container and a vacuum near a corner wall of the room accumulating waste rags (D006 and D007). The containers were closed, labeled with the words hazardous waste, labeled with an indication of the hazards of the contents, and marked with waste codes.

Bead Blast Room

Small parts are media blasted in enclosed media blast units. Inspectors observed two 55-gallon containers in this area accumulating waste media blast filters (D006 and D007) and waste media blast debris. The containers were closed, labeled with the words hazardous waste, and marked with waste codes. The 55-gallon container accumulating waste media blast debris was not labeled or marked with an indication of the hazards of the contents.

Pursuant to Florida Administrative Code Annotated (F.A.C.) Chapter 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 Chapter 403 of the Florida Statutes, Fla. Stat. § 403.702 et seq., [Section 3005 of RCRA, 42 U.S.C. § 6925], and without complying with F.A.C. Chapter 62-730.160(1), [40 C.F.R. § 262.16(b) or §262.17(a)], except as required in F.A.C. Chapter 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 F.A.C. Chapter 62-730.160(1), [40 C.F.R. § 262.15(a)] (hereinafter referred to as the “SAA Permit Exemption”).

Pursuant to F.A.C. Chapter 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 with an indication of the hazards of the contents.

Media Blast Bay

Inspectors observed three 55-gallon containers in this area accumulating waste aerosol cans, waste paint related material (D006 and D007), and waste rags (D006 and D007). The containers were closed, labeled with the words hazardous waste, labeled with an indication of the hazards of the contents, and marked with waste codes.

A paint booth located in this area conducts aircraft painting operations. The painting process was in operation at the time of this inspection and access was limited.

Building 1424 – Fix-Wing Flight Maintenance

Inspectors observed four 55-gallon containers in separate flammable lockers accumulating waste aerosol cans, waste solvents, waste rags, and waste cleaning solution. The containers were closed, labeled with the words hazardous waste, labeled with an indication of the hazards of the contents, and marked with waste codes. Non-hazardous waste fuel filters are also accumulated in this area.

Building 2941 – Maintenance Building

Inspectors observed three 55-gallon containers positioned next to wall at the end of the building accumulating waste rags (F003, F005, D006 and D007), waste corrosive material (D002 and D006), and waste flammable material (D001, D006 and F005). The containers were closed, labeled with the words hazardous waste, labeled with an indication of the hazards of the contents, and marked with waste codes.

Inspectors observed a 55-gallon container in a flammable locker accumulating used oil. The container was closed and labeled with the words used oil.

12) Waste Management Practices

NASWF generates various characteristic hazardous waste that are ignitable (D001), corrosive (D002), reactive (D003), and toxic (D005, D006, D007, D008, D009, D018, D026, and D035) and listed hazardous waste (F003 and F005). The facility accumulates hazardous waste in containers at satellite accumulation areas, prior to accumulating hazardous in containers in a 90-day or less accumulation area. The facility generates universal waste batteries, lamps, and used oil.

The facility prepares the hazardous waste for packaging and on-site management, prior to shipping the hazardous waste using the manifest system to a treatment, storage or disposal facility (TSDF).

NASWF used the following transporters in 2017, 2018, 2019, and 2020.

Hulls Environmental Services – FLR000194712

Robbie D Wood – ALD067138891

Lamp Environmental Industries – LAR000055467

AR Paquette and Co. – FLD982105984

Action Resources – ALR000007237

NASWF used the following TSDF in 2017, 2018, 2019, and 2020.
AES Environmental LLC – Calvert City – KYD985073196
Clean Earth of Calvert City, KY – KYD985073196

13) **Record Review**

Manifests

Inspectors reviewed several hazardous waste manifests for the shipment of hazardous waste from February 2017, to January 2020.

Universal waste batteries and lamps are shipped using the hazardous waste manifest system.

Six hazardous waste manifests were reviewed using EPA's E-Manifest Record System, for shipments in July 2018, January 2019, February 2019, November 2019, and December 2019.

Waste Determinations/Laboratory Analysis/Waste Profiles/SDSs

Inspectors reviewed the 2017 and 2019 waste profile and laboratory analysis report on the hot water spray cabinet sludge (sludge) generated in the GSE Maintenance Building. The sludge was sampled on October 3, 2017, and on September 16, 2019, and laboratory tested for volatile organic compounds, semivolatile organic compounds, and RCRA metals.

Contingency Plan

Inspectors reviewed the facility's contingency plan (Plan). The Plan's revision I was dated December 2018. The Plan lists Jonathan Stewart as the primary emergency coordinator and Jeff Kissler as the alternate with contact information. The Plan describes the NASWF operations, implementation of the Plan, emergency response procedures, emergency response incidents, an evacuation plan and map and emergency response agencies. Inspectors reviewed a list describing the location and capabilities of available emergency equipment. The Plan describes arrangements with the local authorities, which includes the Santa Rosa Medical Center, Fire and Emergency Services – Gulf Coast, and the NASWF Security. The Plan include a Quick Reference Guide in accordance with 40 C.F.R. 262.262(b)(5).

Arrangements with Local Authorities

The arrangements with the local authorities was reviewed. Arrangements were made with the Santa Rosa Medical Center on June 4, 2019, with Fire and Emergency Services – Gulf Coast on May 22, 2019, and with the NASWF Security on June 24, 2019.

Personnel Training

Inspectors reviewed RCRA annual refresher training given to employees in 2018, 2019, and 2020. The annual RCRA refresher training is given by the Civil Engineering Core Officers School (CECOS) to environmental managers and staff and to the point source coordinators (supervisors and managers). Mr. Josh McCrea instructed the CECOS-RCRA Refresher training given in 2020. Inspectors reviewed the training given to the environmental managers and staff and to point source coordinators on February 28, 2017, February 7, 2019, and February 6, 2020. The managers give training to their staff handling hazardous waste.

Mr. Garth Garrison and Mr. Walter Franklin were the instructors for the 2019, and 2020, hazardous waste refresher training given to employee in the North Field Area. The training is

given monthly to employees based on the employee birth date. Inspectors reviewed the training roster for employees given hazardous waste refresher training on September 18, 2019, and February 12, 2020.

Also, employees handling hazardous waste in the satellite accumulation areas are given annual hazardous waste field refresher training by managers. Inspectors explained the annual refresher training given to employees should be documented. Training records documenting job titles and job descriptions were reviewed.

Weekly Container Inspection Records

Inspectors reviewed the weekly container inspection records for the Building 3156 - 90-Day or Less Accumulation Area from February 20, 2017, to February 12, 2020.

Biennial Report

The 2017 biennial report was reviewed. NASWF submitted the report to the FDEO on February 22, 2018

Land Disposal Restriction Notice

The land disposal restriction documents were reviewed.

Recommendation

Managers who give their employees annual visual field refresher training on handling hazardous waste in satellite accumulation areas should document the training.

NASWF should become familiar with the Hazardous Waste Pharmaceutical rule.

14) Exit-Briefing

Upon conclusion of the inspection, an exit briefing was conducted in the presence of Naval Air Station Whiting Field representatives. The facility was informed of the findings at the time of the inspection.

15) Sampling Overview

Sampling was not conducted at this facility.

16) Conclusion/Summary of Violations

Based on the CEI conducted on February 12, 2020, Naval Air Station Whiting Field was inspected as a large quantity generator of hazardous waste and a small quantity handler of universal waste. A deficiency of the RCRA regulations was discovered at the time of the inspection.

17) **Signed**



for

William Kappler
Physical Scientist
Enforcement Compliance and Assurance Division

3/18/2020
Date

18) **Concurrence**



Alan A. Annicella
Chief, Land Asbestos and Lead Section
Chemical Safety and Land Enforcement Branch

3/18/2020
Date



Naval Air Station Whiting Field. Main 90-Day or Less Accumulation Area Building 3156. Observed four boxes stacked two high on a poly pallet. Inspectors could not observe the hazardous waste label on each of the bottom boxes due to the double stacking. The facility removed the two top boxes revealing the labels. Photograph 1 taken at 10:16 a.m. WK.



Naval Air Station Whiting Field. Main 90-Day or Less Accumulation Area Building 3156. Observed four boxes stacked two high on a poly pallet. Inspectors could not observe the hazardous waste label on each of the bottom boxes due to the double stacking. The facility removed the two top boxes revealing the labels. Photograph 2 taken at 10:16 a.m. WK.



Naval Air Station Whiting Field. Paint Booth and Corrosion Building 3024. Observed one 55-gallon container under a manual drum compactor. Container was on a pallet. Photograph 3 taken at 11:16 a.m. WK.