

RCRA Inspection Report

1) Inspector and Author of Report

Javier García, Environmental Engineer
RCRA Enforcement Section
Chemical Safety and Land Enforcement Branch
Enforcement and Compliance Assurance Division
U.S. Environmental Protection Agency, Region 4
61 Forsyth Street, S.W. Phone: (404) 562-8616
Atlanta, Georgia 30303 Email: garcia.javier@epa.gov

2) Facility Information

McEntire Joint National Guard Air Base
1325 South Carolina Road
Eastover, South Carolina 29044

EPA ID #: SC4572825160

NAICS Codes: 92811 NATIONAL SECURITY

3) Responsible Officials

Lt. Col. James Merriman
Environmental Manager
Phone: (803) 647-8535
james.merriman@us.af.mil

4) Inspection Participants

Lt. Col. James Merriman	McEntire JNGB
Tom J. Richmond	S.C. Department of Health and Environmental Control
Javier García	U. S. EPA, Region 4

5) Date of Inspection

April 13, 2021

6) Applicable Regulations

South Carolina Hazardous Waste Management Act, S.C. Code Ann. § 44-56-10 et seq., [Resource Conservation and Recovery Act (RCRA) Sections 3002 (42 U.S. Code – Annotated U.S.C.A. 6925 and 6927)], and South Carolina Hazardous Waste Management Regulations (SCHWMR), 25 S.C. Code Ann. Regs. 61-79.260-270, 61-79.273 and 61-79.279 [40 Code of Federal Regulation (C.F.R.), Parts 260 - 270, 273, 278, & 279].

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**

The purpose of this inspection was to conduct an announced compliance evaluation inspection to determine the McEntire Joint National Guard Air Base's compliance with the applicable requirements of RCRA and the corresponding the South Carolina Hazardous Waste Management Regulations (SCHWMR), 6 and 7 S.C. Code Ann. Regs, 61-79, as amended, promulgated pursuant to the South Carolina Hazardous Waste Management Act, S.C. Code Ann. Section 44-56-30, as amended. regulations. This was an EPA lead inspection.

8) **Previous Inspection History**

On June 16, 2016, the South Carolina Department of Health and Environmental Control (SCDHEC) inspected the facility. No violations or areas of concerns were cited in the inspection report.

9) **Facility Description**

The McEntire Joint National Guard Base (McEntire JNGB) is affiliated with the South Carolina Air National Guard (SCANG). The facility is located about 12 miles east of Columbia, South Carolina. The property is owned by the U.S. Air Force and covers over 2,400 acres. Personnel at the facility include traditional national air guard members (part time training and deployment) and active national air guard reserve members. The facility houses the SCANG 169th Fighter Wing, 169th Maintenance Group, 169th Mission Support Group, the 245th Air Traffic Control Squadron and the 169th Medical Group, with over 1,500 airmen assigned to the base.

In its most recent Hazardous Waste Generator Notification (EPA Form 8700-12) dated January 29, 2020, McEntire JNGB notified as a small quantity generator (SQG) of hazardous waste and as a small quantity handler of universal waste (SQHUW). Routine hazardous waste generated at the facility are from airplane maintenance and touch-up painting activities (e.g. spent solvents from cleaning activities, waste paint, waste sealants and jet fuel contaminated materials). The hazardous waste codes included in the January 2020 notification were: D001, D002, D003, D006, D007, D008, D010, D011, D035, D039, F002, F003 and F005. In addition, the facility generates used oil, universal waste lamps and batteries.

10) **Opening Conference**

Due to the Coronavirus (COVID-19), the EPA pre-announced the inspection via an email sent to Lt. Col. James Merriman, on March 23, 2021. In the email, the EPA explained the purpose of the inspection and included a list of the documents to be reviewed as part of the inspection.

Upon arrival at McEntire JNGB's main gate on April 13, 2021, EPA inspector Javier García, accompanied by SCDHEC inspector Tom Richmond, met Lt. Col. Merriman and presented their

credentials. Lt. Col. Merriman led the inspectors to a conference room, where they were joined by: Col. Akshai Gandhi (Base Commander), Col. Andrew Thorne (Base Vice Commander), Col. Adrian Meyer (Maintenance Group Commander), Col. Michael Dotson, (Support Group Commander), 1ST SGT. Dayne Peterson and NCO Timothy Urch. The inspectors introduced themselves and explained the purpose of the visit.

The inspectors explained that due to COVID-19, the facility tour was going to be limited and the record review was going to be virtual. The inspectors described the anticipated use of a digital camera during the inspection. Next, the facility's representatives provided a brief description of the McEntire JNGB operations. The inspection participants also discussed health and safety protocols and required personal protective equipment before Lt. Col. Merriman led the inspectors to a tour of the facility.

11) **Findings**

Central Accumulation Area (CAA) – Building 282

McEntire JNGB operates a CAA for temporary storage of its hazardous wastes, used oils and universal wastes prior to off-site shipment. The CAA is a three-sided metal building with a gated chain link fence, and concrete bermed floor (Photograph 1). The CAA was identified with a sign which read “Hazardous Waste Accumulation Area No Smoking” The CAA was equipped with a safety shower and eyewash unit, spill containment kit and a fire extinguisher.

The facility stores waste segregated by waste classification and combustibility. All containers were stored along the two side walls of the building and on self-contained pallets. In the area assigned for non-RCRA regulated wastes, the inspectors observed two 55-gallon containers of waste grease, and two containers of Cee-Bee® cleaner (one 14-gallon container and one 5-gallon container). All containers were labeled, closed, and appeared to be in good condition (Photograph 2).

In the area assigned for RCRA regulated wastes, the inspectors observed one 14-gallon container of jet fuel contaminated absorbent pads, one 30-gallon container of jet fuel sludge and one 5-gallon container reported to contain a spent carbon canister from the paint cans puncturer unit. All hazardous waste containers were dated, closed, and appeared to be in good condition (Photograph 3).

In the universal waste (UW) storage section, the inspectors observed one container of UW lamps, one container of lithium batteries, one container of UW alkaline batteries and one container of UW nickel-cadmium batteries. All containers were dated, closed, and appeared to be in good condition (Photograph 4).

Adjacent to the CAA, the inspectors observed four self-contained metal shelters. In shelter D, the inspectors observed one 55-gallon container of non-RCRA regulated waste oil contaminated rags to be laundered (Photograph 5). No waste management activity was reported for shelter C. In shelter B, the facility operates an aerosol can puncturing device to empty its hazardous waste paint aerosol cans. The puncturing device was attached to the bung hole of a 30-gallon container.

The container was properly labeled, closed, and appeared to be in good condition (Photograph 6). In shelter A, the facility operates an aerosol can puncturing device to empty its hazardous waste aerosol oil/lube cans. The puncturing device was attached to the bung hole of a 30-gallon container. The container was properly labeled, closed, and appeared to be in good condition (Photograph 7).

Maintenance Hanger – Building 253

Upon arriving to the building, Col. Michael Dotson joined the inspection team. In the building, the facility conducts metal fabrication activities (e.g., folding, welding, machining) and aircrafts maintenance activities. Routine hazardous wastes generated in the building include adhesives, resins, alodine, and spent cleaning solutions.

In satellite accumulation area (SAA) 019, the inspectors observed one 14-gallon container with hazardous waste resins, one 14-gallon container of flammable hazardous waste resins, one 14-gallon container of hazardous waste resin hardener contaminated materials, one 14-gallon container of hazardous waste paint waste, one 5-gallon container of hazardous waste spent cleaning solution and one 1-gallon container of spent alodine. All hazardous waste containers were properly labeled, closed, and appeared to be in good condition (Photograph 8).

In the SAA for the aircrafts phase inspection area, the inspectors observed one 35-gallon container of hazardous waste resin hardener contaminated materials, one 14-gallon container of hazardous waste Jet A fuel contaminated absorbent pads, one 5-gallon container labeled of UW lithium batteries, one 5-gallon container of hydraulic oil filters and one 15-gallon container oil contaminated absorbent pads. All containers were properly labeled, closed, and appeared to be in good condition (Photograph 9).

In the wheel and tire inspection area, the inspectors observed two small part wash units and one 10-gallon container with used oil contaminated rags. The container was properly labeled, closed, and appeared to be in good condition.

Outside the hangar, in an area referred to as the Flight Line, the facility operates an SAA for waste generated from maintenance activities of aircrafts fuel systems. In the SAA, the inspectors observed one 15-gallon container of hazardous waste off-spec resin kits (resin and hardener kits), one 55-gallon container of hydraulic oil contaminated absorbent pads and one 55-gallon container of jet fuel contaminated absorbent pads. All containers were properly labeled and appeared to be in good condition. The hazardous waste container was missing the ring that secures the container's lid (Photograph 10). (Note: On April 16, 2021, Lt. Col. Merriman emailed to the inspectors a photograph of the container with the lid properly secured.)

Pursuant to 25 S.C. Code Ann. Regs. 61-79.262.15(a) [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 44-56-60(a)(2) and (b)(3) of the SCHWMA, S.C. Code Ann. § 44-56-60(a)(2) and (b) [Section 3005 of RCRA, 42 U.S.C. § 6925], and without

complying with 25 S.C. Code Ann. Regs. 61-79.262.16(b) or R.61-79.262.17(a) [40 C.F.R. § 262.16(b) or §262.17(a)], except as required in 25 S.C. Code Ann. Regs. 61-79.262.15(a)(7) and (8) [40 C.F.R. § 262.15(a)(7) and (8)], provided that the generator complies with the satellite accumulation area conditions listed in 25 S.C. Code Ann. Regs. 61-79.262.15(a) [40 C.F.R. § 262.15(a)] (hereinafter referred to as the “SAA Permit Exemption”).

Pursuant to 25 S.C. Code Ann. Regs. 61-79.262.15(a)(4) [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.

Air Ground Equipment Area

This area is used for maintenance of aircraft support vehicles and equipment. Hazardous wastes generated in this area includes hazardous waste flammable solids, lead, used oil, fuel filters and oil filters. Upon arriving to this area, the Senior MSGT. Rector (Base Maintenance Manager) joined the inspection team.

Outside the building, in a self-contained storage unit, the facility operates SAA 001. In the SAA, the inspectors observed one 1-gallon empty container labeled hazardous waste-lead, one 30-gallon container of hazardous waste jet fuel contaminated absorbent pads, one 55-gallon container of used oil contaminated absorbent pads, one 55-gallon container of used oil drained filters and one 55-gallon container of diesel filters. All containers were properly labeled, closed, and appeared to be in good condition (Photograph 11).

Petroleum Oil Lubrication (POL #15)

This is the loading/distribution station for the petroleum products used at the facility. In SAA 015, the inspectors observed one 30-gallon container of hazardous waste jet fuel filtration sludge and one 25-gallon hazardous waste jet fuel contaminated absorbent pads. All containers were properly labeled, closed, and appeared to be in good condition (Photograph 12)

Propulsion Building:

In this building, the facility conducts engine maintenance activities. In one area, the inspectors observed one 5-gallon container with alkaline waste batteries. In SAA 008, the inspectors observed one 55-gallon container of hazardous waste fuel filters and one 55-gallon container of used oil contaminated filters (Photograph 13). The containers were closed and appeared to be in good condition. The hazardous waste container was not marked with an indication of the hazards of its contents. (Note: Lt. Col. Merriman corrected the deficiency during the inspection.)

Pursuant to 25 S.C. Code Ann. Regs. 61-79.262.15(a)(5) [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.

Avionics Intermediate Section (AIS)

In this area, the facility maintains and calibrates aircrafts’ electronic equipment. In SAA 002, the inspectors observed one 5-gallon container of hazardous waste paint waste, one 1-gallon container of hazardous waste leaded solder flux and one 5-gallon container of solvent contaminated shop wipes. The containers were closed and appeared to be in good condition. Neither the hazardous waste paint waste container nor the hazardous waste leaded solder flux waste container was marked with an indication of the hazards of its contents (Photograph 14). (Note: On April 16, 2021, Lt. Col. Merriman emailed to the inspectors, photographs of the containers with the required markings.)

Pursuant to 25 S.C. Code Ann. Regs. 61-79.262.15(a)(5) [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.

Aerospace Controller Area (ACA)

No hazardous waste was observed in this area.

Munitions Storage Area:

In this area, the facility generates hazardous wastes from touch-up painting activities. In SAA 012, the inspectors observed one 30-gallon hazardous waste container with an aerosol can puncturer attached to the container’s bung hole and one 14-gallon hazardous waste paint waste container. Both containers were properly labeled, closed, and appeared to be in good condition (Photograph 15).

Records Review

Because of COVID-19 exposure concerns, the records review portion of the inspection was conducted onsite and virtual. The following documents were reviewed:

- Used oil and universal waste shipment documents
- Hazardous waste manifests and land disposal restriction notifications
- Hazardous waste training program records
- Facility emergency response plan
- Weekly inspection logs

All shipping documents and manifests (January 2018 to March 2021) were found to be complete. Based on the reviewed manifests, McEntire JNGB ships hazardous wastes offsite about every four months.

The facility inspects its SAAs and the CAA on a weekly basis. The inspection logs were found to be complete. McEntire JNGB has an annual training program for the emergency response plan. The training records and emergency response plan were up to date.

11) **Summary**

The inspectors conducted the exit meeting with Lt. Col. Merriman and provided the preliminary results of the inspection. McEntire JNGB was inspected as a small quantity generator of hazardous waste.

12) **Signed**

Javier E. García
Inspector and Author of Report

Date

13) **Concurrence and Approval**

Araceli B. Chavez
Chief
RCRA Enforcement Section

Date

EPA RCRA Compliance Evaluation Inspection Photographs

McEntire Joint National Guard Air Base
1325 South Carolina Road
Eastover, South Carolina 29044

EPA ID: SC4572825160

Photographs Taken by Javier García
With Samsung Camera (Model WB250F)
EPA Property Tag# S75951 on
April 13, 2021



Photograph 1: Front view of McEntire JNGB's hazardous waste central accumulation area.



Photograph 2: Non-RCRA regulated grease waste containers in the facility's hazardous waste central accumulation area.



Photograph 3: Hazardous waste containers in the facility's hazardous waste central accumulation area.



Photograph 4: Universal waste containers in the facility's hazardous waste central accumulation area.



Photograph 5: Shelter D - one 55-gallon container of non-RCRA regulated waste oil contaminated rags to be



Photograph 6: Shelter B- Hazardous waste accumulation container with aerosol can puncturing device used to empty hazardous waste paint aerosol cans generated at the facility.



Photograph 7: Shelter A – Hazardous waste accumulation container with aerosol can puncturing device to empty hazardous waste aerosol oil/lube cans generated at the facility.



Photograph 8: Hazardous waste containers observed in satellite accumulation area (SAA) 019. All containers were properly closed, labeled, and appeared to be in good condition.



Photograph 9: Containers observed in the SAA at the “Phase” Inspection Area. All containers were properly closed, labeled, and appeared to be in good condition.



Photograph 10: Containers in the SAA at the Flight Line Maintenance Area. activities of aircrafts fuel systems. The hazardous waste container (14-gallon yellow container) was missing the ring that secures the container’s lid.



Photograph 11: Air Ground Equipment Maintenance Area - SAA 001
One 1-gallon empty container labeled hazardous waste-lead, one 30-gallon hazardous waste container of jet fuel contaminated absorbent pads, one 55-gallon container of used oil contaminated absorbent pads, one 55-gallon container of used oil drained filters and one 55-gallon container of diesel filters.



Photograph 12: Hazardous waste containers in the SAA at the loading/distribution station for the petroleum products used at the facility.



Photograph 13: Propulsion Building – Hazardous waste 55-gallon container and 55-gallon container of used oil contaminated filters in SAA 008 at the Propulsion Building. The hazardous waste container was not marked with an indication of the hazards of its contents.



Photograph 14: Avionics Intermediate Section - Hazardous waste in SAA 002. Neither the hazardous waste paint waste container nor the hazardous waste leaded solder flux waste container was marked with an indication of the hazards of its contents.



Photograph 15: Munitions Storage Area – In SAA 012, the inspectors observed one 30-gallon hazardous waste container with an aerosol can puncturer attached to the container's bung and one 14-gallon hazardous waste paint waste container.