

Multi-Media Inspection Report

Camp Santiago Joint Maneuver Training Center
Salinas, PR
May 2023

Submitted to:

U.S. ENVIRONMENTAL PROTECTION AGENCY
WJC Building, 1200 Pennsylvania Ave., NW
Washington DC, 20004



Submitted by:

Abt Associates, Inc. under
CONSULTING AGREEMENT # 53965
Task Order# 68HERC22Q011

Prepared by:

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MULTI-MEDIA INSPECTION REPORT

U.S. Environmental Protection Agency, Region 2
Enforcement and Compliance Assurance Division
290 Broadway, 21st floor, New York, New York 10007-1866

Locational Information

Facility Name: Camp Santiago Joint Maneuver Training Center
Facility Address: State Rd #1, Intersection Rd #154, Salinas, PR 00751
Latitude & Longitude: 18.001111, -66.291677

ICIS & other Program ID Codes as appropriate

FRS: 110067612630
CAA: 02000110006868979 and PR0000007212300028
CWA: PRU201970 and PRR053286
PWS: PR563095
RCRA: PR5211810002; PRD982275406
UST: PR-02-04-0005 (AAFES)

Sector Information

Federal Facility: Yes
SIC: 9711 (National Security)
NAICS: 928110 (National Security)

Environmental Sensitivity Information

Potential Flood-Prone Area: No (See Appendix C: FEMA Flood Map)
Potential EJ Concerns: Yes (See Appendix D: EJ SCREEN)

Inspection Information

Dates of Inspection: May 22-23, 2023
Inspectors: Carlos Colombani, EPA-R2-CEPD
Erin Floto, EPA-R2-ECAD-CAPSB
Jillian Harvey-Shepard, EPA-R2-ECAD-CAPSB
Charles Zafonte, subcontractor to Abt Associates

Facility Representatives

See attached sign-in sheet, Appendix A

Updates to EPA Databases

Camp Santiago appears to be SQG.

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1. INTRODUCTION

The Region 2 office of the U.S. Environmental Protection Agency (EPA) requested a compliance evaluation inspection under the Federal Facilities Inspection Initiative across federal environmental statutes and regulations of Camp Santiago Joint Maneuver Training Center (CSJMTC), located in Salinas, PR. The Region 2 office determined that: (1) EPA Inspector Carlos Colombani, would conduct a Resource Conservation and Recovery Act - Subtitle C (hazardous waste management) evaluation of the facility; (2) EPA Inspector Erin Floto would conduct a Clean Air Act evaluation of the facility; and (3) contractor Abt Associates, Inc. and its subcontractor, Charles Zafonte, under EPA's Federal Facilities Enforcement Office contract, would provide assistance to EPA in preparing for and conducting the evaluation, as well as preparing the report, for the following federal environmental programs, as applicable to the facility: Safe Drinking Water Act (SDWA) Public Water System Supervision (PWSS), Resource Conservation and Recovery Act - Subtitle I (underground storage tanks), Clean Water Act (CWA) National Pollutant Discharge Elimination System (NPDES), and CWA Spill Prevention, Control & Countermeasure (SPCC). Since EPA allotted five days for the inspection of six federal facilities, the Region 2 office also directed that if time is limited, the facilities should be evaluated for compliance with the four programs in the priority order listed above. Ms. Harvey-Shepard and Messrs. Colombani and Zafonte conducted the joint evaluation of the facility on-site on May 22-23, 2023, while Ms. Floto conducted her evaluation off-site. This report presents their observations and findings.

In preparation for the on-site multi-media inspection (MMI) as well as to conduct the Clean Air Act (CAA) offsite compliance monitoring (OfCM) activity, Erin Floto, in her role as the Federal Facility Program Manager (FFPM), contacted facility representative Lieutenant Colonel Brenda Acosta on February 16, 2023, requesting documents. A OneDrive folder was provided to the facility to drop files related to the various statutes. Documents were provided over time into the OneDrive file. Notification for the MMI was provided via phone and confirmed by email one week prior to the date of the MMI.

CSJMTC is primarily a field training center for the Puerto Rico Army National Guard (PRANG). The facility sits on approximately 12,000 acres in an arid area of southern Puerto Rico. Camp Santiago consists of barracks, firing ranges, facility maintenance areas, vehicle fueling and maintenance areas and office buildings. While troops reside overnight during training exercises, Camp Santiago has no permanent housing. A major tenant of Camp Santiago is the Maneuver Area Training Equipment Site (MATES), which maintains and fuels military vehicles. MATES has its own EPA Facility Registry System (FRS) and Resource Conservation and Recovery Act (RCRA) generator ID numbers, but compliance with most of the environmental laws and regulations is managed by Camp Santiago. The official point of contact for Camp Santiago is Colonel Carlos Caez-Sierra, and the primary environmental contact is Mr. Jose Velasquez, Director, Department of Public Works. He and Marisol Diaz, Ileana Mejia, Legna Siberon, and Maria Santiago escorted us and provided information on the facility.

Arriving at approximately 2:15 pm on May 22, 2023, Mr. Velasquez greeted us in Building 55, where we presented EPA and contractor credentials and business cards and offered in- and out-briefings and the option of claiming confidential information (none claimed). The

attached meeting sign-in sheet, (See Appendix A), identifies the meeting participants, including facility representatives who phoned in from Fort Buchanan, which, located in San Juan, provides a significant support and management function for Camp Santiago.

2. APPLICABILITY OF ENVIRONMENTAL LAWS

Clean Air Act (CAA)

The facility's twenty-four generators as well as their air conditioners/chillers are subject to the CAA.

Clean Water Act (CWA)

The facility discharges all wastewater to the Puerto Rico Aqueduct and Sewer Authority (PRASA)'s local Publicly Owned Treatment Works (POTW); however, the facility does not meet EPA and PRASA criteria requiring a wastewater discharge permit. The facility did submit a Notice of Intent (NOI) to be covered under the EPA Municipal Separate Storm Sewer Systems (MS4) Permit. Also, due to its 119,000-gallon above-ground fuel storage capacity, the facility is subject to the spill prevention, control and countermeasure (SPCC) requirements under the CWA; the facility updated its SPCC Plan this year.

Emergency Planning and Community Right-to-Know Act (EPCRA)

The facility files Tier 2 reports for chlorine and for diesel fuel.

Resource Conservation and Recovery Act (RCRA)

The facility's programmatic IDs are listed as Very Small Quantity Generators (VSQG) of hazardous waste under Subtitle C of RCRA (RCRA-C). The facility also operates regulated underground storage tanks (USTs) under Subtitle I of RCRA (RCRA-I).

Safe Drinking Water Act (SDWA)

The facility supplies its own potable water from two on-site wells and is subject to the Public Water System Supervision (PWSS) program as a non-transient, non-community water system.

3. FACILITY TOUR AND DOCUMENT REVIEW

Scope of Compliance Evaluation

This compliance evaluation included the following applicable programs: CAA, SDWA PWSS, RCRA-C and RCRA-I. CWA NPDES and CWA SPCC evaluations were not conducted due to time restraints. No multi-media screening checklist was completed. Ms. Floto conducted the CAA OfCM activity; Mr. Colombani conducted the RCRA-C inspection; and Ms. Harvey-Shepard and Mr. Zafonte conducted the SDWA PWSS and RCRA-I inspections. We reflected our observations in the respective sections of the report, below.

CAA

All observations related to the CAA were completed during an off-site review of the documents. EPA requested the facility's CAA permit as well as the facility's emergency generator records. The facility has 24 emergency generators. The facility's permit allows for emergency generators

to be in use for a maximum of 515 hours per calendar year. The facility did not provide the requested logs for individual generators but did provide the specifications for each emergency generator, their current hour meter reading, and the annual hours each generator was in use from 2019-2022. Please see Section 6, "Requested Information."

In addition to the generators, the facility provides in-house maintenance for their air conditioning units that contain refrigerants. The facility provided the certification for the on-site technician and there were no concerns with the documentation provided. The facility does not have any units that have a refrigerant charge capacity over 50 lbs.

SDWA PWSS

The following information was gathered from documents provided by PRANG in advance of the inspection and from discussions during the the inspection. CSJMTC is located on 12,000 acres of mountainous terrain in Salinas Puerto Rico. The facility has no permanent residences; troops are only housed temporarily during training periods. The CSJMTC Public Water System is composed of two deep water wells; chlorine and phosphate injection; a 350,000-gallon concrete water storage tank and distribution pipelines.

Source water wells No. 1 and No. 2 are pumped alternately, and controlled manually or by a timer. The water storage tank is located uphill of and at the opposite end of the facility's distribution system from the water wells. The tank can be filled only through the water mains of the distribution system and thus can only be filled after all the distribution lines are filled with water and the pressure in the distribution lines rises to a maximum level and is maintained at that pressure. Consequently, the water mains, which are approximately fifty years old, are subjected to frequent, ongoing stress.

As indicated above, the facility has no permanent residents, but troops are housed on-site during training periods. As a result, water demand is extremely cyclical, depending on whether troops are present for training. This results in lengthy periods of time when no water is used, especially at night, and water use during the day is limited primarily to offices. This leads to frequent periods of water stagnation in its storage tank and in its distribution system.

The facility lacks a Supervisory Control and Data Acquisition (SCADA) system; adequate calibrated flow meters; and temperature, turbidity, and chlorine sensors.

A detailed 2016 infrastructure assessment for the facility concluded that approximately 75% of the water produced by the system is being lost due to excessive water pressures and aging water mains. Exacerbating the condition of the facility's water mains is scaling caused by the hardness of the aquifer's groundwater. The system has never softened its potable water. The water-bearing formation being used by the facility's water wells is subject to increasing water withdrawals and saltwater intrusion, which can be expected to make the extracted water even harder in the future. In addition, Camp Santiago plans to expand its capacity for troop training, from current levels (which reach 1,000) to 1,400 in the short term, and ultimately to 2,230. If increasing groundwater hardness, decreasing groundwater supply, or any other characteristic makes groundwater use insufficient in the future, the facility intends to draw its water from PRASA.

The facility has initiated a multi-phase project to improve its public water supply system based on the findings and recommendations of the 2016 infrastructure assessment mentioned above. Although we have requested, but have not yet received, a written description of the project, discussions during the on-site inspection indicate the following general aspects to the project:

- Phase 1 – a new water well monitoring system.
- Phase 2 – an upgraded water treatment plant for water chlorination, softening and phosphate addition.
- Phase 3 – design of a new distribution system.
- Phase 4 – new mains for the distribution system.

Facility representatives did not feel free to discuss the details of the project because of a civil and perhaps criminal case being pursued against the contractor hired for the initial phase(s) of the project. A second contractor, however, has completed approximately 65% of the design of a new distribution system for Phase 3.

On Day 2 of the inspection, May 23, 2023, Ms. Harvey-Shepard and Mr. Zafonte met with the facility's water treatment plant operators, Mr. Felix Sanchez and Ms. Wilmarie Cardona. Water treatment operator certificates were provided for Mr. Sanchez (Operator IV, expiring on June 18, 2023; Photo 1) and Ms. Cardona (Operator III, expiring on February 13, 2025; Photo 2). They escorted us to the potable water wells and then we followed the water flow to the water treatment facilities, the water storage tank, and a distribution point. During the tour, we made the following observations:

- Well No. 1 is located within a chain-link fenced area, topped with barbed wire and secured with a lock (Photo 3). The wellhead is housed in Building No. 002 on a concrete pad, which was dry and satisfactorily clean at the time of visit. From the wellhead, water flows through three flow valves, two check valves and a pressure relief valve (Photo 4), which, we were advised, were last confirmed to be operational in 2019. PRANG has no documentation of the valves ever being tested. We were advised that the well pump and water-bearing formation are located approximately 90 feet below the ground surface. We observed that the piping from the well was equipped with a flow meter, but it was not operational. We were advised that the flow meter has been inoperable for years (Photo 5). The last flow data are from 2014; instead, flow is inferred from pump flow velocity and the duration of operation. The meter has not been repaired or replaced because PRANG has been advised to not make changes because changes could jeopardize the enforcement case against the original contractor. We would also learn that this is also the reason for the additional concerns enumerated below not being addressed.
- The pressure relief valve on Well No. 1 discharges to an open pipe outside the building. The pipe opening was not screened (Photo 6). By text the following week, Mr. Velasquez provided photographs of #24-mesh screening on this pipe and on the other open pipes we observed to be unscreened (see below) in the buildings at Wells No. 1 and 2 and the chlorine injection building.
- We then inspected Well No. 2, which is located within another chain-link fenced area, topped with barbed wire, and secured with a lock (Photo 7). The No. 2 wellhead is in Building No. 003 (Photos 8 & 9). The enclosure also contained a shed, two water treatment buildings, and a gas storage building, as described below. Each building

contained one room only. We observed a similar piping configuration and conditions for Well No. 2 as for Well No. 1. In addition to the meter not working (Photo 10), Camp Santiago representatives stated that the pressure relief valve for Well No. 2 could not be calibrated.

- Within the Well No. 2 enclosure was a rectangular shed with one of its long sides open to view. Within the shed, we observed at least several dozen bags of an ion exchange resin designed for water softening. Some of the bags were open and resin was scattered about the shed, unprotected from the elements (Photos 11 & 12). Upon inquiry, facility representatives expressed no knowledge of the material, or why it was there and could provide no Safety Data Sheet for it.
- Next to the shed was a building that was dominated by two softener treatment tanks, one of which had the top separated from its sides (Photos 13-15). Camp Santiago representatives advised that this resulted from an explosion of the water softening system installed by the initial on-site contractor. We were advised that the Camp Santiago water has never been softened. The only operable equipment in the building was a small phosphate feed pump, which is operated the only way the current equipment allows, manually, based on the water level in the facility's only potable water storage tank (Photo 16). The operating pressure was approximately 135 psi, which is required to overcome the high pressures in the distribution lines made necessary by the lack of a dedicated water main from the wells to the storage tank. An approximately 55-gallon drum of phosphate solution was not in secondary containment (Photo 17).
- Next to this building is the chlorine injection building. Between the two buildings was a potable water supply tap with threads for a connection and no cross-connection protection. Camp Santiago representatives stated that they had no idea why the tap is there, or that it presents a potential cross-connection.
- The door of the chlorine building was not equipped with panic hardware; instead, we were advised, the door is kept open whenever the building is visited (Photo 18). The door included a window, allowing a view of room conditions before entering it. Immediately outside the building door was an eyewash station and an overhead shower. Upon testing them, we found that the shower worked, but the eyewash did not (Photo 18). A 150-lb chlorine tank was loosely chained to the rear wall, was not situated on a scale, and was piping chlorine gas into the water line at approximately 300 psi (Photo 19). The room was dry and housekeeping satisfactory, a fan was exhausting room air, and a chlorine sensor was appropriately located about a foot off the floor. We were advised that the sensor has never been calibrated. We observed two unscreened openings at the floor level to the outside of the building; each with wires in their primary plastic insulation, but not contained in electrical conduits (Photos 20 & 21). The windows on either side of the building were equipped with louvers, which appear to provide limited air flow (Photo 22). Upon inquiry, we learned that the personal protective equipment for the chlorine building is located approximately 200 yards away; we suggested a closer location for it since it would be needed in an emergency.
- Next to the chlorine injection building is the chlorine storage building (Photo 23), which contained a 45 kg container of granular calcium hypochlorite, two empty and two full 150-lb cylinders of chlorine chained to a wall (Photos 24 & 25), and the same style window louvers with apparently limited air flow. The room contained four bags marked as resin (Photos 26 & 27). Camp Santiago representatives stated that they had no idea

what it is, or why a contractor left them there. The facility had no Safety Data Sheet for the material.

- The two water treatment operators stated that the procedure they follow when changing chlorine cylinders is as follows:
 - Ensure, when the alarm sounds, or when the weight indicates the gas level is low, that they have backup personnel, which can be one of the facility's security officers on weekends if only one operator is on-site [Note: The chlorine cylinder scale is not working].
 - Get a mask with a chlorine cartridge and ensure that the exhaust fan is on.
 - Close the cylinder valve, unscrew the gas connection, and unchain the cylinder from the wall.
 - Remove the cylinder and hand-truck it to the gas storage building.
 - Reverse the above steps for the new cylinder.
 - Check joints for leaks with ammonia, and if a white precipitate forms, tighten the connection until no precipitate forms when more ammonia is applied to the joint.
- We inspected the facility's wastewater lift station (Building 00341), where Mr. Luis Rivera identified himself as the only operator. A hose, which is used to clean the wastewater inlet rack, was screwed onto a potable water tap (Photo 28). It was not equipped with a vacuum breaker. The influent racks are cleaned weekly, with trash disposed appropriately depending on the results of toxicity testing (Photo 29). We observed that the lift station was supported by an emergency generator (Photo 30) fueled by a 550-gallon aboveground tank storing diesel fuel (Photo 31). Although the tank was in secondary containment, the containment structure also included a vertical open pipe a few inches long set into the concrete (Photo 32). Camp Santiago representatives stated that they had no idea why it was there, or where it led. By text on May 27, 2023, PRANG provided photos showing that the pipe was eliminated, and the floor sealed with concrete. Just inside the building was a fire extinguisher that was significantly undercharged and with no inspection tag attached (Photos 33 & 34).
- At the PX building, the fire sprinkler suppression system included a water tap with threads and a hose attached (Photos 35 & 36).
- At Building 1011 as well as another building, we observed faucets outdoors with no cross-connection protection and with a connected hose lying on the ground (Photos 37 & 38).
- The hatchway for the facility's 350,000-gallon concrete water storage tank (Building 845) had no sanitary seal and was flaking material (Photos 40 & 41). The surface of the tank roof appears degraded in several places (Photos 42-44).

RCRA Hazardous Waste

The CSJMTC facility has two entities with RCRA programmatic identification numbers: MATES (PRD982275406) and the rest of the facility (PR5211810002, CSJMTC). MATES is entirely within the borders of Camp Santiago. As stated in Section 2.1 above, both entities are classified in EPA's RCRAInfo database and the public Enforcement and Compliance History Online (ECHO) website as very small quantity generators (VSQGs) of hazardous waste. The two entities were evaluated to determine if either exceeded the thresholds of a VSQG, and if they were following the applicable hazardous waste management requirements.

CSJMTC and MATES generate various universal and hazardous wastes. These include spent fluorescent lamps, batteries, used coolant, used oil, contaminated fuel/diesel, aerosol cans, and paint wastes. The hazardous waste is sent off the island to the continental United States. The Defense Logistics Agency (DLA) is the one in charge of the pickups and shipments. Based on conversations with Ms. Santiago, both entities are managed as VSQGs.

As VSQGs, these entities would be exempt from most hazardous waste regulations provided they:

- continue to identify all their hazardous waste;
- generate less than 100-kg of nonacute hazardous waste and 1 kg of acute hazardous waste per month;
- never accumulate more than 1,000-kg of nonacute hazardous waste, 100-kg of acute spill cleanup residue, and 1-kg of other acute hazardous waste on-site at any time; and
- continue to ensure that the hazardous waste they generate is sent to an offsite treatment, storage, recycling, or disposal facility capable and permitted to handle such waste.

Based on information gathered from RCRAInfo, there were three overall shipments in 2019, one shipment in 2020, two shipments in 2021, one shipment in 2022, and one shipment so far in 2023.

The following table breaks down the shipments made each calendar year by manifest tracking numbers for both MATES and CSJMTC:

MATES

Manifest Tracking Number	Shipping Date	Amount of Waste (kg)
019765061JJK	January 28, 2019	454
019765379JJK	June 25, 2019	1089
020920707JJK	December 10, 2019	136
021854002JJK	September 22, 2020	1950
023163514JJK	June 28, 2021	1588
023163890JJK	November 9, 2021	454

Camp Santiago

Manifest Tracking Number	Shipping Date	Amount of Waste (kg)
024047895JJK	August 2, 2022	27
024382113JJK	March 21, 2023	30

The following table summarizes the hazardous waste shipments completed by the Facility broken down by IDs for both MATES and CSJMTC by calendar year:

PRD982275406 - MATES

Manifest Year	Acute?	Amount of Waste (kg)	Monthly Average (kg)
2018	Non-Acute	454	38
2019	Non-Acute	1678	140

2020	Non-Acute	1950	163
2021	Non-Acute	2041	170

PR5211810002 – Camp Santiago

Manifest Year	Acute?	Amount of Waste (kg)
2022	Non-Acute	27
2023	Non-Acute	30

Based on individual hazardous waste shipments, it appears that on June 25, 2019; September 22, 2020; and June 28, 2021, MATES stored more than the VSQG accumulation limit of 1,000 kg of hazardous waste on site at one time. Moreover, such storage above the VSQG limit would have been occurring for some time in 2020 and 2021 assuming the less than 100 kg a month VSQG generation rate for non-acute hazardous waste unless MATES generated more than the VSQG monthly rate in those years. In fact, based on the amount of hazardous waste shipped by calendar year, it appears that MATES did generate on average at the small quantity generator (SQG) rate of more than 100 kg per month but less than 1,000 kg per month in 2019, 2020 and 2021. Thus, although MATES does not track waste generation rates on a monthly basis to be able to accurately quantify their monthly hazardous waste generation and correctly determine their waste generator classification, based on the above, from 2019-2021, MATES should have been following at least the SQG requirements.

Since there were no manifests in EPA's system pertaining to MATES after 2021, Ms. Santiago provided two manifests via email. Manifest 024047894JJF dated August 24, 2022, and manifest 024382126JJK dated March 23, 2023. These were non-hazardous waste and universal waste shipments.

CSJMTC stores its hazardous waste at the Logistics Area and MATES stores it within their secured boundary in the accumulation bay. At the Logistics Area, Ms. Madelyn Matias (Supply Staff Sergeant) and Ms. Santiago participated in the walkthrough of the area. Typically, the hazardous waste stored are absorbent materials and aerosol cans. In addition, used oil and universal waste is stored for recycling purposes. The waste is stored in Building 25. At the time of the inspection, the following waste was being stored:

- a box of spent fluorescent lamps dated February 2023; and
- a 55-gallon drum of aerosol cans from 2022 that is still in use.

The building is equipped with spill kits, an eye washing station, and a fire extinguisher in case of a spill and/or emergency. Also, emergency contact information and protocols to follow are posted at the entrance. Note, the box of spent fluorescent lamps and the 55-gallon drum were in good condition and closed.

Pertaining MATES, the site has three (3) areas where waste is generated: Tin 1, Tin 2, and Tin 3 (all vehicle maintenance shops). Typically, the waste generated by MATES is used oil/used oil filters, used rags and absorbent pads. Each Tin has two (2) satellite point areas where Satellite

Point 1 has a container per waste stream of absorbent pads and used oil, and Satellite Point 2 has a container per waste stream of used oily rags, absorbent pads, used oil and filters. Once full, these are moved into the Waste Area.

At the Waste Area, three 55-gallon drums of used oil filters and used oil were being stored. These drums when shipped by DLA will go for recycling. Only key personnel have access to the Waste Area. The area is equipped with spill kits, an eye washing station, a fire suppression system and fire extinguishers in case of a spill and/or emergency. Also, emergency contact information and protocols to follow are posted at the entrance.

RCRA UST

A full compliance evaluation was done for two USTs at the Army and Air Force Exchange Service (AAFES) for which a Region 2 UST Checklist was completed (see Appendix E). A summary of the full compliance evaluation at the AAFES is also provided below. Time constraints permitted only partial compliance inspection of the USTs at POL (Petroleum, Oil & Lubricants) and no inspection of the UST at MATES.

AAFES

Two 12,000-gallon USTs are presently in use by the facility to store gasoline for fueling vehicles, which were both installed in 2004. The UST systems consist of double walled fiberglass reinforced plastic (FRP) tanks with pressurized FRP piping. They both have doubled walled spill buckets, overfill alarms, and doubled-walled piping containment sumps. Interstitial monitoring is used for release detection for both the tanks and piping for both UST systems. The last triennial test of the overfill alarm was conducted on June 28, 2022. Triennial containment integrity tests of the spill buckets and piping containment sumps are not required since they are doubled-walled and the monthly walkthrough inspections by AAFES check for leaks in the interstitial areas. AAFES had one-year of records of their monthly walkthrough inspections.

AAFES has 8 dispensers, which all have under dispenser containment that was installed in 2004 and replaced in 2019. The under-dispenser containment undergoes daily visual inspections and were last checked for integrity on June 28, 2022.

AAFES had 12 months of release detection records for both their piping and tanks and the release detection equipment was last tested for operability on June 28, 2022. The pressurized piping is equipment with an automatic line leak detector (ALLD), which were last tested for operability on May 1, 2023.

AAFES has designated two Class A/B UST operators: Mr. Juan Martinez and Ms. Mildred Guzman. Training documentation for Mr. Martinez and Ms. Guzman were shown to EPA during the inspection along with proof that all designated Class C operators have been trained. However, AAFES did not have a list of designated operators, which, at a minimum, (1) identified all current Class A, B and C operators for the facility, and (2) include the names, Class of operator trained, date assumed duties, date each completed initial training, and any retraining.

POL

The Camp Santiago area designated as POL contained two USTs. Petroleum Supply Specialists Nelson Leon and Jose Ortiz operate the tanks and provided access to them. On June 21, 2021, the Puerto Rico Department of Natural Resources and the Environment issued PRANG Permit # UST 2-86-1929 for operation of the two tanks until June 21, 2024. The permit states that the two tanks:

- Have a capacity of 25,000 gallons each;
- Store diesel fuel;
- Were installed in 1980; and
- Are composed of double-wall steel, shielded from corrosion by cathodic protection.

The permit states that the piping connected to the two tanks is single-wall fiberglass-reinforced plastic and that pumping is safe suction. Opening the tank-top sumps revealed clean and dry tank-top sumps with little corrosion and confirmed pumping is achieved through suction from the dispensers. A Veeder Root TLS-350 automatic tank gauge (ATG) provided tank leak detection, and an ES-2 rectifier provided cathodic protection of the tank. Opening the fill ports revealed clean and dry spill buckets, but no overfill protection through a flapper valve. A ball float valve, instead, was installed on each vent line. Note: ball float valves are not recommended for use with suction piping. We observed an overfill alarm on the outside of the operator's building. This overfill alarm was connected to the tank monitor for these UST systems, and the alarm sounded when the test button was pushed. The tank monitor showed "All Functions Normal."

The ATG is the primary method of tank release detection (records provided for the last twelve months), while line tightness testing provides piping release detection (copy viewed on-site). POL also uses ground vapor monitoring and annual tank tightness testing, the records of which confirmed no leakage. Monthly checklists documented inspections of the UST systems and the cathodic protection system.

The impressed current system was observed to be operating at the time of the inspection. A contractor conducting inspections of the system every two months confirmed sufficient protection.

The loading/unloading areas for these USTs have concrete secondary containment, well beyond any requirements, with valves normally closed and only opened when rain accumulates in the dikes after checking for an oil sheen.

4. PRELIMINARY FINDINGS

Based on observations made during the inspection and/or a review of records related to the inspection, the following preliminary findings have been noted.

RCRA Hazardous Waste

REGULATORY, STAUTORY, OR PERMIT REFERENCE	FIELD OBSERVATIONS
40 CFR Part §§ 262.14(a)(3) and	On June 25, 2019; September 22, 2020; and June 28, 2021, MATES

(4): A VSQG may not store more than 1,000 kg (2,200 lbs) of hazardous waste or 1 kg (2.2 lbs) of acute hazardous waste on site at any time	stored more than the VSQG on-site accumulation quantity threshold of 1,000 kg of non-acute hazardous waste on-site at one time.
--	---

SDWA PWSS

Significant deficiencies and areas of concern were identified in various areas of the PWS and are noted in the following tables. Significant deficiencies include, but are not limited to defects in the design, operation or maintenance, or a failure or malfunction of the sources, treatment, storage, or distribution system, that have been determined to be causing or have the potential for causing the introduction of contamination into the water delivered to consumers. As per 40 CFR § 141.723(c), a response in writing, indicating the procedure and schedule for correcting each significant deficiency is required within 45 days of receipt of this report.

SIGNIFICANT DEFICIENCIES	
AREA OF INSPECTION	FIELD OBSERVATIONS
Source	The pressure relief valve on Well No. 1 discharges to an open pipe outside the building. The pipe opening was not screened (Photo 6). <u>Corrective Action:</u> Mr. Velasquez provided photographs via text message the following week of #24-mesh screening on this pipe, and on the other open pipes we observed to be unscreened in the buildings at Wells No. 1 and 2, and the chlorine injection building. Three flow valves, two check valves and a pressure relief valve receiving flow from the Well No. 1 wellhead were inoperable. CSJMTC/PRANG representatives stated that valve operation was last confirmed in 2019 and valve testing is not recorded. We observed a similar piping configuration and conditions for Well No. 2 as for Well No. 1. In addition to the meter not working (Photo 10), Camp Santiago representatives stated that the pressure relief valve for Well No. 2 could not be calibrated. In a shed within the Well No. 2 enclosure, we observed several dozen opened/destroyed bags of an ion exchange resin, and resin scattered about the floor of the shed, unprotected from the elements (Photo 12).
Treatment	In the chlorine injection building, a 150-lb chlorine gas tank was loosely chained to the rear wall and not situated on a scale. Content measures of tanks are estimated manually. CSJMTC/PRANG representatives advised that the chlorine scale was inoperable, and the chlorine gas sensor had never been calibrated.

	We observed two unscreened pipes at the floor level of the chlorine injection building which opened to the outside, and a wall opening too large for the pipe within it (Photos 17 & 18). An approximately 55-gallon drum of phosphate solution in the chlorine & treatment room was not in secondary containment (Photo 17).
Distribution System	At Building 1033 we observed a faucet without backflow prevention. At Building 1011, we observed a faucet outdoors with a connected hose lying on the ground, without backflow prevention. At the wastewater lift-station (Building 00341), a hose used to clean the wastewater inlet rack (Photo 29) was connected to a potable water tap and was not equipped with a vacuum breaker.
Finished Water Storage	The hatchway for the 350,000-gallon concrete water storage tank (Building 845) had no sanitary seal and was flaking material (Photo 41). The surface of the tank roof appears degraded in several places (Photos 42-44).
Water System Management & Operations	We observed that the piping from the well was equipped with a flow meter, but it was not operational at the time of inspection. Flow meters for both Wells No.1 & No. 2 were not operational at the time of inspection (Photos 5 & 10). Facility representatives expressed no knowledge of the type of resin observed on floor of shed in Well No.2 enclosure; Safety Data Sheet for the material was unavailable.

AREAS OF CONCERN	
AREA OF INSPECTION	FIELD OBSERVATIONS
Source	Horses and their fecal matter were observed on the grounds in various areas of the facility. CSJMTC/PRANG representatives stated they were unsure of the number of horses, who owned the horses or the location of the owner.
Pumps, Pump Facilities and Controls	The facility lacks a Supervisory Control and Data Acquisition (SCADA) system, which monitors information from calibrated flow meters; and temperature, turbidity, and chlorine sensors.
Treatment	The windows of the chlorine injection building and the chlorine storage building were equipped with small louvers, which provided inadequate air flow.

	Doors of the chlorine injection building and the chlorine gas tank storage building were not equipped with panic hardware. In the chlorine injection building, we observed electric wires covered with plastic insulation, but not contained in an electrical conduit.
Distribution	The facility lacks a cross-connection control and backflow prevention program. The cyclical nature of the facility's water demand creates areas of stagnant water in the distribution system where water is little used.
Water Storage	The facility's water storage tank can stratify during periods of low water usage; the tank has no features that provide mixing of stored water.
Water System Management & Operations	We observed that the lift station operations were supported by an emergency generator, fueled by a 550-gallon tank storing diesel fuel. Although the tank was in secondary containment, the containment structure also included a permanent vertical open pipe a few inches long. PRANG representatives stated that they had no idea why it was there, or where it led. <u>Corrective Action:</u> Following the inspection, PRANG documented that the open pipe was cut and sealed with cement. Although Camp Santiago representatives stated that the facility's fire department flushes the water mains, uses velocity meters to ensure adequate flow velocity for scouring, and samples before- and after-flushing to determine whether additional flushing is appropriate, no records are kept. Thus, the effectiveness of the flushing program is unclear. The facility lacks a valve exercising and inventory program, which would specify the number of turns for each valve and would ensure that valves are readily available for each valve size and type that may need to be replaced during the exercise program. Personal protective equipment for use in response to the chlorine building is located approximately 200 yards away. The eyewash station at the side of the chlorine injection building was inoperable.

5. ENVIRONMENTAL ASSISTANCE

To increase the Federal community's understanding and compliance with applicable environmental requirements, EPA, along with other Federal agencies, sponsor Fed Center, the Federal government's home for comprehensive environmental stewardship and compliance assistance

information for Federal facility managers and their agencies. Fed Center can be accessed via the worldwide web at <https://www.fedcenter.gov/>

Also, based on the observations made during the inspection, the facility could consider:

- Establishing a method of tracking hazardous waste generation by month as a best management practice to ensure they accurately know their hazardous waste generator classification and the requirements they need to follow; and
- Creating a list of designated UST operators, which, at a minimum, (1) identifies all current Class A, B and C operators for the facility, and (2) includes the names, Class of operator trained, date assumed duties, date each completed initial training, and any retraining. Note: This is a requirement of the 2015 revisions to the 1988 EPA UST regulations that Puerto Rico is in the process of incorporating into their requirements.

6. REQUESTED INFORMATION

EPA is requesting individual generator logs from 2019-2022 to complete this compliance evaluation. Once received, the information will be reviewed.

APPENDICES:

A: FACILITY SIGN IN LOG

B: INSPECTION PHOTOGRAPHS

C: FEMA FLOOD MAP

D: EJ SCREEN

E: UST INSPECTION CHECKLIST

APPENDIX A: FACILITY SIGN IN LOG

Facility: Camp Santiago, San Juan, PR

Date & Time: 5/22/23 2:15pm

<u>NAME</u>	<u>TITLE</u>	<u>RESPONSIBILITY</u> <u>Re: THIS MEETING</u>	<u>PHONE</u>	<u>EMAIL ADDRESS</u>
Charles Zafonte	EPA contractor	Lead inspector	610-392-6960	zafontechas@gmail.com
Jillian Harvey-Shepard	EPA Inspector- In Training		212-637-4078	harveyshepard.jillian@epa.gov
Carlos J. Colomboni	EPA Inspector	RCRA-HW	787-977-5862	colomboni.carlos@epa.gov
Jose E. Velazquez	DDW Director	Owner	787-902-2984	jose.e.velazquez@army.mil
Rolando López Feliciano	DDW Environmental represent		787-219-3821	rolando.lopezfeliciano.mil@army.mil
Brenda Liz Acosta	Environmental Program manager		787 289 1400 X 1084	brenda.l.acosta@army.mil
Maria Santiago	Envir. Specialist	via phone	787 289 1400 X 1073	ileana.m.mejiamaymi.nfg@army.mil
Iliana Mejia	Envir. Specialist	via phone	787 289 1400 X 1074	maria.m.santiago.nfg@army.mil
Maj Alejandro Fonseca	CFMO DPM, Engineer	via phone	787-289-1400 X 1054	alejandro.fonseca-rodriguez.mil@army.mil

Facility:

Camp Santiago, San Juan, PR

Date & Time:

5/23/23 8:55am

Day 2
Field Work
Closing Meeting

NAME	TITLE	RESPONSIBILITY Re: THIS MEETING	PHONE	EMAIL ADDRESS
Charles Zafonte	EPA contractor	Lead inspector	610-392-6960	zafontechas@gmail.com
Jillian Harvey-Shepard	EPA Inspector- In Training		212-637-4078	harveyshepard.jillian@epa.gov
Wilmarie Cardona	Potable water operator plant III		787-557-5010	wilmarie.cardona@upr.edu
Félix Sánchez	Potable water operator Plant IV		787-323-0062	felixsanchez.70@outlook.com
✓ Maria Santia	Environmental Spc		787-289-1400 GX+1073	maria.m.santiago.nfs@army.mil
✓ Jose E. Velázquez	DPW, Director		787-402-298	jose.e.velazquezcar6@army.mil
Carlos J. Colombani	EPA Inspector	RCRA-HW	787-977-5862	colombani.carlos@epa.gov
✓ Ilcana Mejia	^{PRAPB} State ENV Specialist		^{X 1078} 787-289-1400	ilcana.munizmejia.mil@army.mil
✓ Rolando Lopez	DPW Environmental represent.		787-219-3821	rolando-lopezfeliciano.mil@army.mil
(✓) Pasual Desire	G4 Rep		787-405-009	desire.pascualmejias.mil@army.mil
(✓) Félix, Joan	MATES SUPPLY		787-718-2687	joan.felixmartinez.mil@army.mil
(✓) Marín, Christian	MATES Assist. Superintendent		787 914 6987	christian.marin-rivera.mil@army.mil
(✓) Perez, Merced	MATES Superintendent		787-420-7220	mercedperez-velazquez.mil@army.mil
(✓) Carlos Caerz ^{Out-Brief only}	CFMO Director	Via phone	^{X1055} 787-289-1400	Carlos.R.CaerzSierra.mil
(✓) Alejandro Fonseca	CFMO Engineer	Via phone	787-289-1400 ^{X 1054}	@army.mil alejandro.fonseca-rodriguez.mil@army.mil

(✓) = only attended closing briefing

Out-Brief only

APPENDIX B: INSPECTION PHOTOGRAPHS

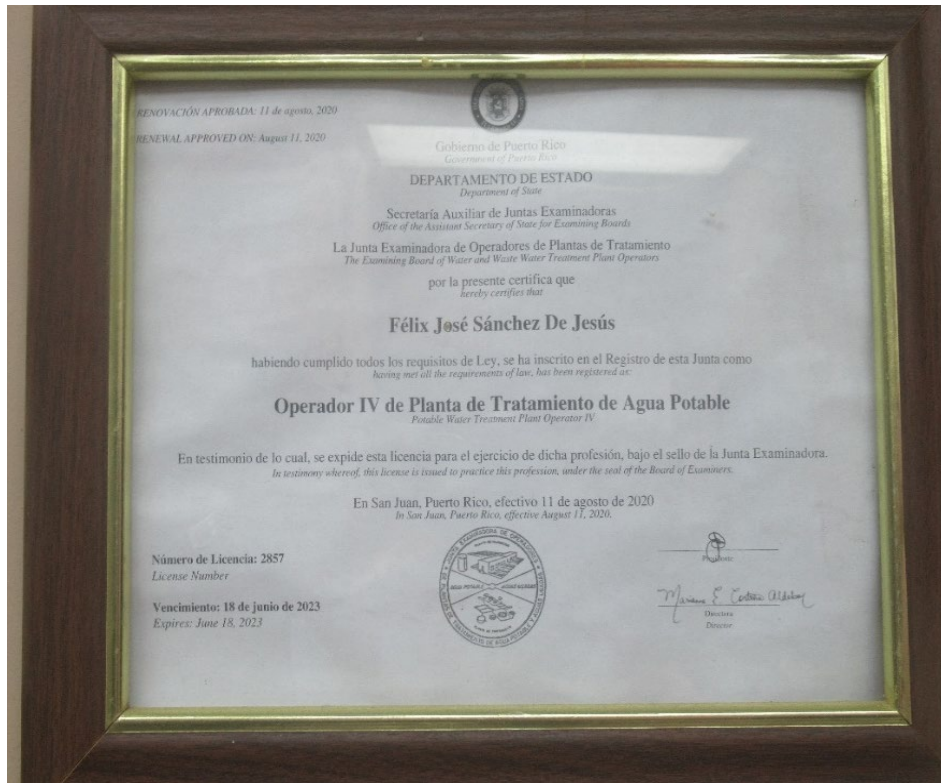


Photo 1 - Treatment Operator IV certificate for Mr. Sanchez Ms. Cardona



Photo 2 - Treatment Operator III certificate for Ms. Cardona



Photo 3 – Well No.1/Building (Bldg.) 002, secured enclosure and signage.



Photo 4 –Bldg.002; Well No. 1 well head



Photo 5-Well No.1 flow meter (non-functional)



Photo 6 – Bldg.002; unscreened pipes at the rear of building



Photo 7 – Well No.2/Bldg.003 secured enclosure signage



Photo 8 – Bldg. 003 façade



Photo 9 – Bldg. 003; interior, Well No.2 wellhead



Photo 10 – Bldg. 003; Well No.2 flow meter



Photo 11 - Shed in Well No.2 enclosure, bags of ion exchange resin



Photo 12 - Opened bags of exposed of ion exchange resin



Photo 13 – Treatment & Chlorine Room; water softener tanks 1&2



Photo 14 – Water softener tank 2; top of tank separated from its sides



Photo 15 – Water softener tank 2 electrical hub



Photo 16 – Phosphate chemical (55gallon drum),
chemical analyzer and feed pump



Photo 17 – Treatment & Chlorine Room; 55-gallon drum of phosphate chemical on wooden pallet

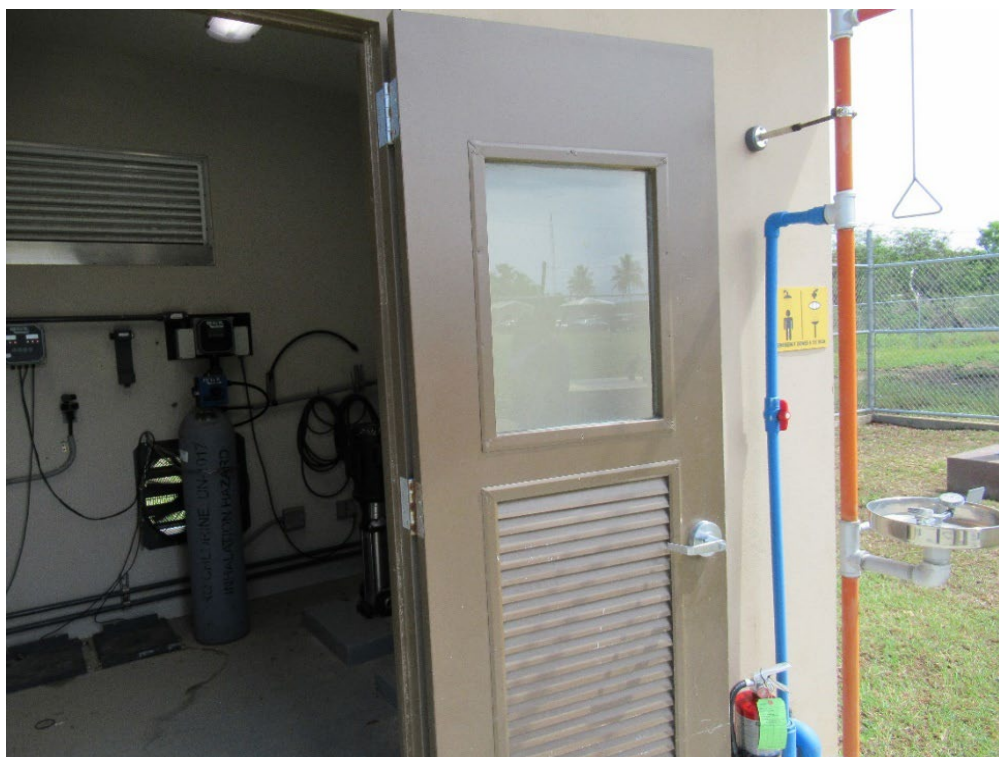


Photo 18 – Door of chlorine injection bldg. (interior facing), overhead shower & eye wash station



Photo 19 – Chlorine bldg. exhaust fan, chlorine gas tank and scale (1 of 2)



Photo 20 – Chlorine room; unscreened wall opening with unprotected wiring (1 of 2)



Photo 21 - Chlorine room; unscreened wall opening with unprotected wiring (2 of 2)



Photo 22 – Chlorine injection building; louvered window



Photo 23 – Chlorine storage shed



Photo 24 – Chlorine gas cylinders (full & empty), granular calcium hypochlorite



Photo 25 – 45-kg container of granular calcium hypochlorite



Photo 26 – Chlorine storage shed; ion exchange resin (1 of 2)



Photo 27 – Chlorine storage shed; ion exchange resin (2 of 2)



Photo 28 – Bldg. 00341; wastewater lift station



Photo 29 – Bldg. 00341; wastewater inlet screen



Photo 30 – Wastewater lift station diesel-fueled power generator



Photo 31- Bldg.00341; 550-gallon above ground diesel fuel storage tank



Photo 32 –Bldg. 00341; diesel fuel tank secondary containment; in-ground vertical pipe



Photo 33- Bldg. 00341; fire extinguisher without inspection tag



Photo 34 – Bldg. 00341; depressurized fire extinguisher



Photo 35- PX bldg.; fire suppression water supply and check valves

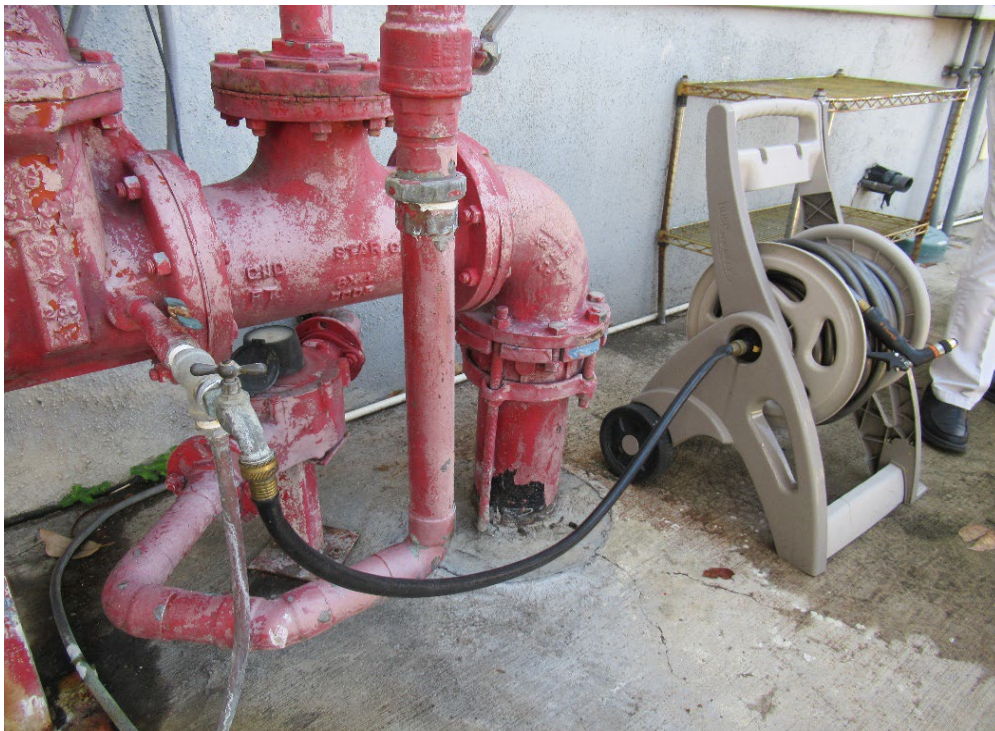


Photo 36 – PX bldg.; hose connected directly to fire suppression water supply



Photo 37 – Bldg. 1011; outdoor faucet with connected hose



Photo 38 – Area of Bldg. 1011; threaded outdoor faucet



Photo 39 – Bldg. 845; potable water storage tank secured enclosure and signage



Photo 40 – Bldg. 845; potable water storage tank hatchway (1 of 2)



Photo 41- Bldg. 845; potable water storage tank hatchway (2of 2)



Photo 42 –Bldg. 845; surface of potable water storage tank (1 of 3)

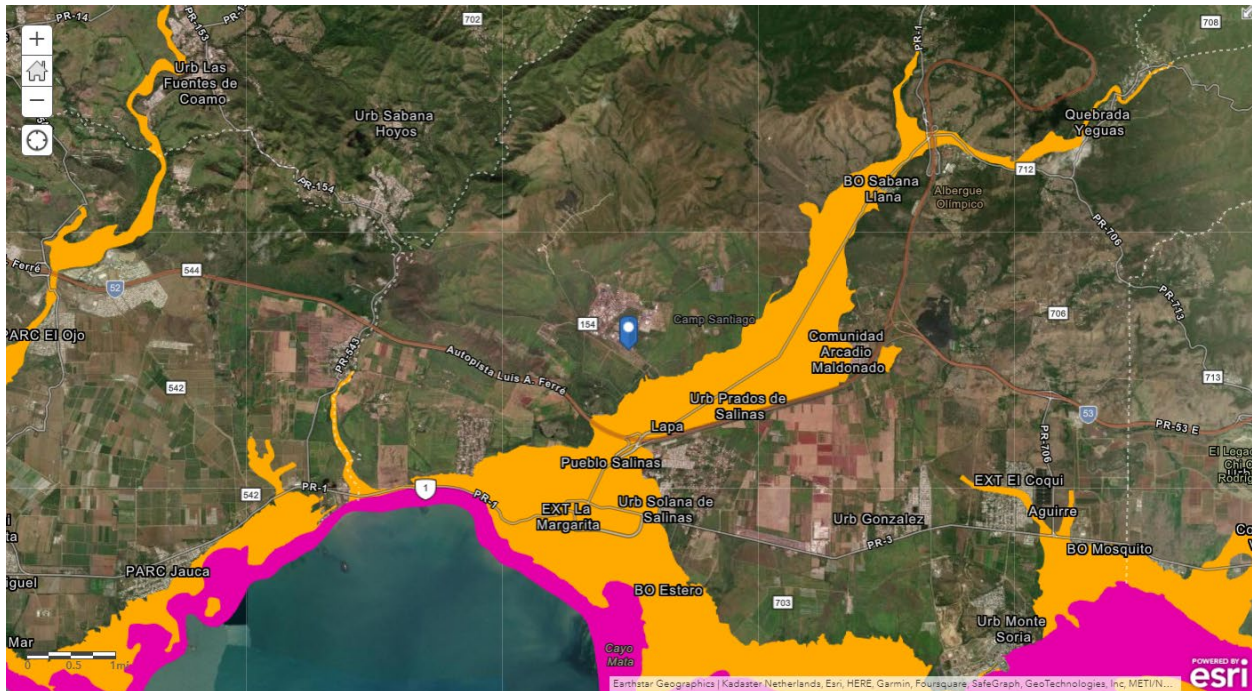


Photo 43 -Bldg. 845; surface of potable water storage tank (2 of 3)



Photo 44 – Bldg. 845; surface of potable water storage tank (3 of 3)

Appendix C: Federal Emergency Management Agency (FEMA) 100 Year Flood Zone and EPA's Region 2 Composite Flood Risk Layer



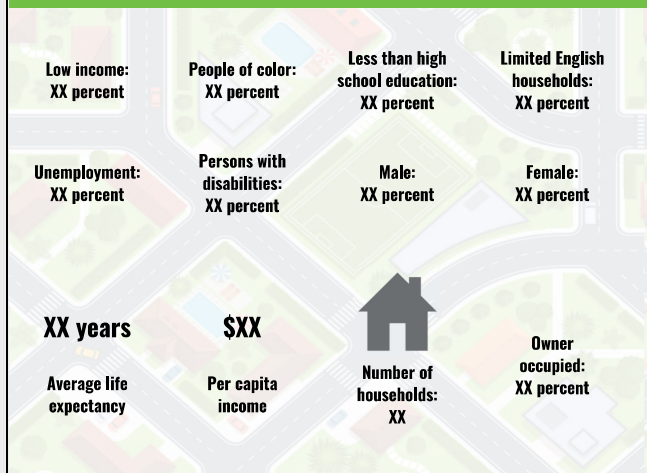
EJScreen Community Report

This report provides environmental and socioeconomic information for user-defined areas, and combines that data into environmental justice and supplemental indexes.

The area is too small or sparsely populated, or these data are not available in the national dataset. Cannot generate an EJScreen chart or report.

Area reserved for map

COMMUNITY INFORMATION



BREAKDOWN BY RACE

White: XX% Black: XX% Asian: XX% Hispanic: XX%

American Indian: XX% Hawaiian/Pacific Islander: XX% Other race: XX% Two or more races: XX%

LANGUAGES SPOKEN AT HOME

LANGUAGE	PERCENT
English	XX%
Spanish	XX%
French, Haitian, or Cajun	XX%
German or other West Germanic	XX%
Russian, Polish, or Other Slavic	XX%
Other Indo-European	XX%
Korean	XX%
Chinese (including Mandarin, Cantonese)	XX%
Vietnamese	XX%
Tagalog (including Filipino)	XX%
Other Asian and Pacific Island	XX%
Arabic	XX%
Other and Unspecified	XX%
Total Non-English	XX%

BREAKDOWN BY AGE



LIMITED ENGLISH SPEAKING BREAKDOWN



Notes: Numbers may not sum to totals due to rounding. Hispanic population can be of any race. Source: U.S. Census Bureau, American Community Survey (ACS) 2017-2021. Life expectancy data comes from the Centers for Disease Control.

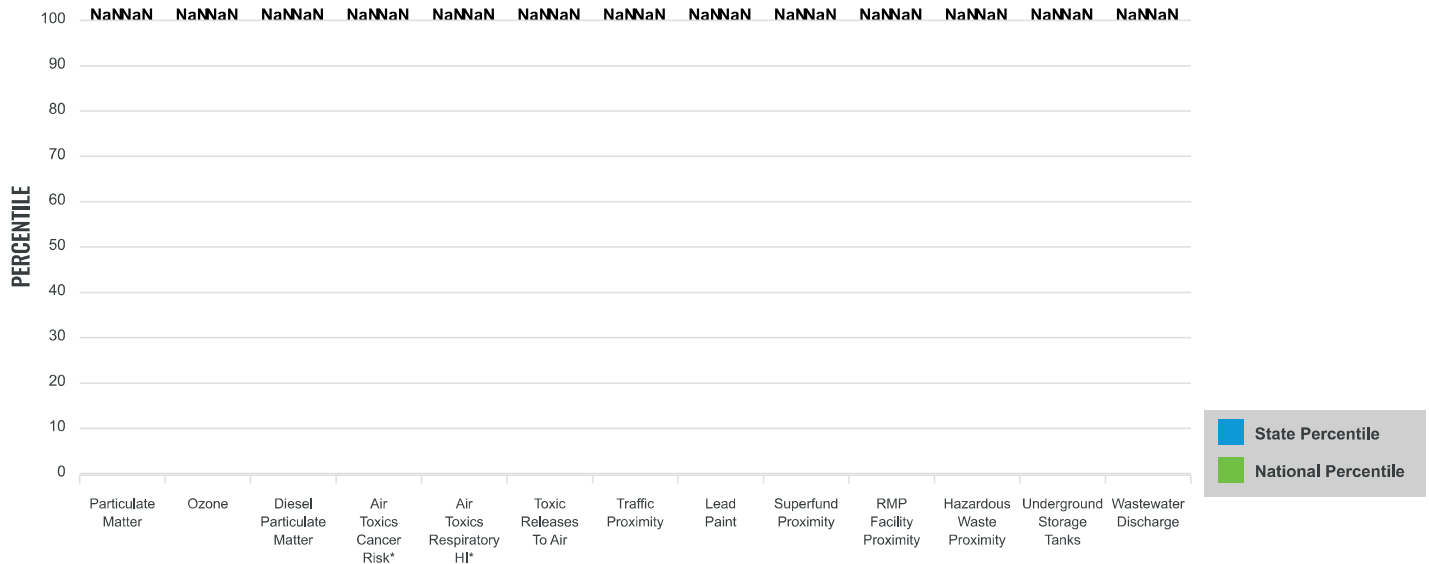
Environmental Justice & Supplemental Indexes

The environmental justice and supplemental indexes are a combination of environmental and socioeconomic information. There are thirteen EJ indexes and supplemental indexes in EJScreen reflecting the 13 environmental indicators. The indexes for a selected area are compared to those for all other locations in the state or nation. For more information and calculation details on the EJ and supplemental indexes, please visit the [EJScreen website](#).

EJ INDEXES

The EJ indexes help users screen for potential EJ concerns. To do this, the EJ index combines data on low income and people of color populations with a single environmental indicator.

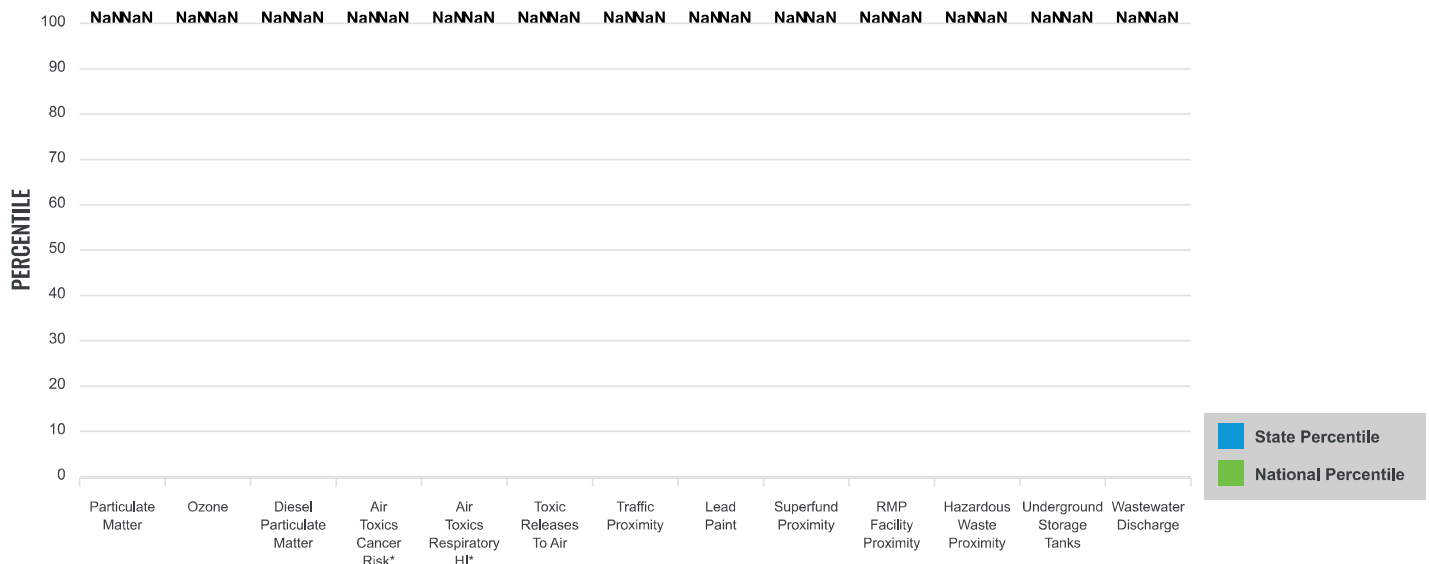
EJ INDEXES FOR THE SELECTED LOCATION



SUPPLEMENTAL INDEXES

The supplemental indexes offer a different perspective on community-level vulnerability. They combine data on percent low-income, percent linguistically isolated, percent less than high school education, percent unemployed, and low life expectancy with a single environmental indicator.

SUPPLEMENTAL INDEXES FOR THE SELECTED LOCATION



These percentiles provide perspective on how the selected block group or buffer area compares to the entire state or nation.

Report for XX

EJScreen Environmental and Socioeconomic Indicators Data

SELECTED VARIABLES	VALUE	STATE AVERAGE	PERCENTILE IN STATE	USA AVERAGE	PERCENTILE IN USA
POLLUTION AND SOURCES					
Particulate Matter ($\mu\text{g}/\text{m}^3$)	N/A	N/A	N/A	8.08	N/A
Ozone (ppb)	N/A	N/A	N/A	61.6	N/A
Diesel Particulate Matter ($\mu\text{g}/\text{m}^3$)	N/A	0.0667	N/A	0.261	N/A
Air Toxics Cancer Risk* (lifetime risk per million)	N/A	23	N/A	28	N/A
Air Toxics Respiratory HI*	N/A	0.19	N/A	0.31	N/A
Toxic Releases to Air	NaN	4,300	NaN	4,600	NaN
Traffic Proximity (daily traffic count/distance to road)	NaN	180	NaN	210	NaN
Lead Paint (% Pre-1960 Housing)	N/A	0.16	N/A	0.3	N/A
Superfund Proximity (site count/km distance)	N/A	0.15	N/A	0.13	N/A
RMP Facility Proximity (facility count/km distance)	N/A	0.47	N/A	0.43	N/A
Hazardous Waste Proximity (facility count/km distance)	N/A	0.76	N/A	1.9	N/A
Underground Storage Tanks (count/km ²)	N/A	1.7	N/A	3.9	N/A
Wastewater Discharge (toxicity-weighted concentration/m distance)	N/A	2.3	N/A	22	N/A
SOCIOECONOMIC INDICATORS					
Demographic Index	N/A	83%	N/A	35%	N/A
Supplemental Demographic Index	N/A	43%	N/A	14%	N/A
People of Color	N/A	96%	N/A	39%	N/A
Low Income	N/A	70%	N/A	31%	N/A
Unemployment Rate	N/A	15%	N/A	6%	N/A
Limited English Speaking Households	N/A	67%	N/A	5%	N/A
Less Than High School Education	N/A	21%	N/A	12%	N/A
Under Age 5	N/A	4%	N/A	6%	N/A
Over Age 64	N/A	22%	N/A	17%	N/A
Low Life Expectancy	N/A	N/A%	N/A	20%	N/A

*Diesel particulate matter, air toxics cancer risk, and air toxics respiratory hazard index are from the EPA's Air Toxics Data Update, which is the Agency's ongoing, comprehensive evaluation of air toxics in the United States. This effort aims to prioritize air toxics, emission sources, and locations of interest for further study. It is important to remember that the air toxics data presented here provide broad estimates of health risks over geographic areas of the country, not definitive risks to specific individuals or locations. Cancer risks and hazard indices from the Air Toxics Data Update are reported to one significant figure and any additional significant figures here are due to rounding. More information on the Air Toxics Data Update can be found at: <https://www.epa.gov/haps/air-toxics-data-update>.

Sites reporting to EPA within defined area:

Superfund	0
Hazardous Waste, Treatment, Storage, and Disposal Facilities	0
Water Dischargers	4
Air Pollution	2
Brownfields	0
Toxic Release Inventory	1

Other community features within defined area:

Schools	0
Hospitals	0
Places of Worship	0

Other environmental data:

Air Non-attainment	Yes
Impaired Waters	Yes

Selected location contains American Indian Reservation Lands*	No
Selected location contains a "Justice40 (CEJST)" disadvantaged community	Yes
Selected location contains an EPA IRA disadvantaged community	Yes

Report for XX

EJScreen Environmental and Socioeconomic Indicators Data

HEALTH INDICATORS

INDICATOR	HEALTH VALUE	STATE AVERAGE	STATE PERCENTILE	US AVERAGE	US PERCENTILE
Low Life Expectancy	N/A	-99999900%	N/A	20%	N/A
Heart Disease	N/A	-999999	N/A	6.1	N/A
Asthma	N/A	-999999	N/A	10	N/A
Cancer	N/A	-999999	N/A	6.1	N/A
Persons with Disabilities	N/A	21.6%	N/A	13.4%	N/A

CLIMATE INDICATORS

INDICATOR	HEALTH VALUE	STATE AVERAGE	STATE PERCENTILE	US AVERAGE	US PERCENTILE
Flood Risk	N/A	-99999900%	N/A	12%	N/A
Wildfire Risk	N/A	-99999900%	N/A	14%	N/A

CRITICAL SERVICE GAPS

INDICATOR	HEALTH VALUE	STATE AVERAGE	STATE PERCENTILE	US AVERAGE	US PERCENTILE
Broadband Internet	N/A	32%	N/A	14%	N/A
Lack of Health Insurance	N/A	7%	N/A	9%	N/A
Housing Burden	No	N/A	N/A	N/A	N/A
Transportation Access	No	N/A	N/A	N/A	N/A
Food Desert	No	N/A	N/A	N/A	N/A

Footnotes

Report for XX



United States Environmental Protection Agency (EPA)

Region 2

290 Broadway

New York, NY 10007-1866

Underground Storage Tank (UST) Inspection Form

INSPECTOR NAME(S): Charles Zafonte

DATE: 5/23/2023

SIC CODE:

ICIS #:

I. Location of Tank(s) ☐ Tribal		II. Ownership of Tank(s) ☐ same as location (I.)	
Facility Name <u>Camp Santiago Express</u>		Owner Name <u>AAFEs</u>	
Street Address <u>Bldg 180 " Salina</u>		Street Address <u>same</u>	
City <u>Salinas</u>	State <u>PR</u>	City	State
	Zip Code <u>00751</u>		Zip Code
County <u>---</u>		County	
Phone Number <u>7878247626</u>		Phone Number	
Email/Website <u>aafe.com</u>		Email/Website	
Contact Person(s) <u>Juan Martinez</u>		Contact Person(s)	
IIIB. Operator of Tank(s) ☐ same as location (I.)		IIC. Ownership of UST(s) at Other Facilities	
Contractor Name		☐ Do you own UST(s) at other UST Facilities Yes / No	
Street Address		If Yes, How many Facilities _____	
City	State	How many USTs _____	
	Zip Code		
	County		
Phone Number	Fax Number		
III. Notification [§ 280.22 – Subpart B]			
☐ Notification to implementing agency; name _____			
State Facility ID # <u>11512-04-0005</u>			
Date Issued: <u>Nov 5, 2020</u> Date Expires: <u>Nov 5, 2023</u>			
Any change from previous Notification noted? (Owner/ Operator/ Substance stored/ Substance compatibility?) Y ☐ N ☒			
If Yes, Describe: _____			
IV. Financial Responsibility [§ 280.93(a) – Subpart H]			
☐ State Fund* ☐ Private Insurance: Insurer/Policy # _____			
☐ Guarantee ☐ Surety Bond ☐ Letter of Credit			
☐ Local Government ☐ Self Insured ☒ Not Required (Federal & State government, hazardous substance USTs)			
*If NY State, then answer: Is there private insurance for third party bodily injury?			
V. Operator Training [§ 280.240 – Subpart J]			
Is there an individual trained for A and B operator classes? Yes ☒ No ☐			
Name of Class A Operator <u>Juan Martinez + Mildred Guzman</u>			
Are all operators for class C trained? <u>20</u> Yes ☒ No ☐			
Does owner have a list of designated operators currently trained at each facility? Yes ☐ No ☒			
Does owner have proof of operators training or retraining? Yes ☒ No ☐			
Notes:			

VI. Tank Information	Tank No.	1	2				
Tank presently in use		Y	Y				
If not, date last used (see Section XII)							
If empty, verify 1" or less left (see Section XII)							
Capacity of Tank (gal)		12,000	12,000				
Substance Stored		Regular	Premium				
Compatibility Records Available?							
(Compatibility Demonstrated?)		NA	NA				
M/Y Tank installed/Upgraded		2004	2004				
<u>Tank Construction:</u> Bare Steel, Sti-P3, Retrofitted sacrificial anode, Impressed Current, Composite, FRP, Interior lining, Vaulted		FRP	FRP				
Secondary Containment?		DW	DW				
Spill Prevention [§ 280.20(c)(1)(i), § 280.21(d)]							
Double Walled? Y/N		Y	Y				
If Yes, Last Monthly Check?	2023	April	April				
If No, Last Triennial Containment Integrity Test?		NA	NA				
Overfill Prevention (specify type) [§ 280.20(c)(1)(ii), § 280.21(d)]		6/28/22	6/28/22				
Last Triennial Inspection?		"	"				
<u>Special Configuration:</u>							
Compartmentalized, Manifolded,		No	No				
Field Constructed,		No	No				
Airport Hydrant System		No	No				
VII. Piping Information							
<u>Piping Type:</u> Pressure, Suction		Pressure	Pressure				
<u>Piping Construction:</u>							
Bare Steel, Sacrificial Anode, Impressed Current, Flex, FRP, Double-walled (DW), Non-corrodible piping		FRP	FRP				
<u>Under Dispenser Containment ("UDC")?</u> Y/N		Y	Y				
If Yes, installation date? & dispenser		2004	2004				
Date of last visual inspection/periodic monitoring		Daily	Daily				
Part of Line RD? Y/N							
If above Y, UDC Double Walled? Y/N							
If DW, Last Monthly Check of Annular Space?		6/28/22	6/28/22				
If non-DW or no monthly check of DW, last 3-Yr Containment Integrity Test?		"	"				

Section Continues to Page 3

VII. Piping Information

(Continued)

Tank No.	1	2				
Secondary Containment Sump Used for						
Release Detection? Y/N	Y	Y				
If Yes, Is Containment Sump Single/Double Walled? (SW/DW)	Y	Y				
For SW, or DW w/o monthly check of annular space, last 3-YR integrity check/DW sumps with monthly monitoring - Last check of Annular space?	N/A	N/A				

Tank and Piping Notes:

Tank No.	1	2				
----------	---	---	--	--	--	--

VIII. Corrosion Protection (§ 280.31)

Integrity Assessment conducted prior to upgrade

Interior Lining

Interior lining inspected

Is lining sole protection? Y/N

Impressed Current

CP Test Records

60-day Rectifier inspection records

Sacrificial Anode:

CP Test Records

CP Notes: (Include notes of any Interior Lining inspection)

IX. Release Detection (§ 280.43-Subpart D)

Tank RD Methods

ATG

Interstitial Monitoring

Groundwater Monitoring*

Vapor Monitoring*

Inventory Control w/ TTT

Manual Tank Gauging

Manual Tank Gauging w/ TTT

SIR

12 Months Monitoring Records (§ 280.41(a), § 280.45(b))

Must Make Available Last 12 Months

For Compliance

*Site assessment/installation documentation?

RD Equipment Last Tested?

N/A

✓

✓

✓

✓

✓

✓

4/28/22 6/24/24

Section Continues on Page 4

IX. Release Detection

(Continued)

Tank RD Notes: (State What Months Records Were Available, Describe Any Failures and Describe What Investigation Occurred Due to Failure)

Tank No.	1	2				
-----------------	---	---	--	--	--	--

Pressurized & Non-Exempt Suction Piping
 RD Methods ☐ N/A

Interstitial Monitoring	✓	✓				
Groundwater Monitoring*						
Vapor Monitoring*						
Other? (specify)						

OR

Annual Line Tightness Test	Monthly	Monthly				
----------------------------	---------	---------	--	--	--	--

AND

Installed? Y/N						
----------------	--	--	--	--	--	--

ALLD

Last Annual Test (§ 280.44(a))	May/2023	—				
--------------------------------	----------	---	--	--	--	--

12 Months Monitoring Records (§ 280.41(b)(1)(ii))

*Site assessment/installation documentation?

--	--	--	--	--	--	--

RD Equipment Last Tested?

6/28/22	6/28/22					
---------	---------	--	--	--	--	--

Are under Dispenser Containments (UDC) Monitored?

Monthly	Monthly	(+ have sensors)	water + fuel			
---------	---------	------------------	--------------	--	--	--

via Visual Inspection

via Electronic Monitoring

Records of inspections available?

✓	✓					

UDC Monitoring Notes: (Records of release: State the past 12 months monitoring records)

Piping RD Notes: (State What Months Records Were Available, Describe Any Failures and Describe What Investigation Occurred Due to Failure)

X. Repairs [§ 280.33 – Subpart C]N/A ☐

Repaired tanks and piping are tightness tested within 30 days of repair completion

Y ☐ N ☒ Unknown ☐

CP systems are tested/inspected within 6 months of repair of any cathodically protected UST system

N/A Y ☐ N ☐ Unknown ☐

Records of repairs are maintained

N/A Y ☐ N ☐ Unknown ☐**“Overfill/Spill/Secondary Containment systems are tested/inspected within 30 days of repair”****XI. Temporary Closure** [§ 280.70 – Subpart G]N/A ☒

CP continues to be maintained

Y ☐ N ☐ Unknown ☐

UST system contains product and release detection is performed

Y ☐ N ☐ Unknown ☐

Cap and secure all lines, pumps, manways

Y ☐ N ☐ Unknown ☐**XII. Release History** [§ 280.50 – Subpart E]N/A ☐☐ To your knowledge, are there any public or private Drinking Water Wells in the vicinity? Yes ☐ No ☒☐ Evidence of release or spills at facility☐ Evidence of release in the surrounding area to the facility☐ Greater than 25 gallons (estimate)☐ Releases reported to implementing agency; if so, date(s) _____ [§ 280.53]☐ Release confirmed; when and how _____☐ Initial abatement measures and site characterization☐ Free product removal☐ Soil or ground water contamination☐ Corrective action plan submitted☐ Remediation ongoing☐ Remediation completed, no further action; date(s) _____☐ Unusual Operating Conditions☐ Interstitial Monitoring alarms

Notes:

XIII. Walkthrough Inspections [§ 280.36 – Subpart C]**Owner and operators must conduct walkthrough inspections of the following:**Must have monthly records Y ☒ N ☐

Spill Prevention Equipment – must be checked for damage, remove liquid or debris, and check fill cap.

Y ☒ N ☐

DW spill prevention equipment with interstitial monitoring – must check for leak in interstitial area.

Y ☒ N ☐ N/A ☐Release detection equipment – must check to ensure operating with no alarms and review records of release detection testing. Y ☐ N ☐Must have annually records Y ☒ N ☐

Containment sumps – must check for damage, leaks, remove liquid or debris.

Y ☒ N ☐

DW sumps with interstitial monitoring – must be checked for leak in interstitial area.

Y ☒ N ☐ N/A ☐

Hand held release detection equipment – must check tank gauge sticks or groundwater bailer.

Y ☒ N ☐*** Owners and operators of UST system(s) must maintain records of operation and maintenance walkthrough inspections for one year.**

SITE DRAWING (NOT TO SCALE)

DATE: 5/23/2023 TIME ON SITE: _____ TIME OFF SITE: _____

WEATHER: hot, humid, clear, ^{skies} partly cloudy

ENVIRONMENTALLY SENSITIVE AREA: Y ☐ N ☒

If "Yes", please describe:

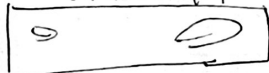
DISPENSERS

7	5	3	1
8	6	4	2

REGULAR



PREMIUM



OVERFILL
ALARM

☐ Pictures



THE UNITED STATES ENVIRONMENTAL PROTECTION AGENCY (EPA)
REGION 2 UST PROGRAM
Underground Storage Tank Team
New York, NY 10007-1866

Facility Name Camp Santiago AAFES
Address _____
UST Reg # PR 02 04 0005

Inspector Observation Report

Inspection of Underground Storage Tanks (USTs)

☐ No areas of concern observed at the conclusion of this inspection.

☐ The above named facility was inspected by a duly authorized representative of EPA Region 2, and the following are the inspector's observations and/or recommended corrective action(s):

Areas of Concern Observed:

Regulatory Citation	Area of Concern
\$	<u>None</u>
\$	
\$	
\$	
\$	
\$	
\$	
\$	
\$	

Actions Taken:

☐ Field Citation; # _____ ☐ Additional information required ☐ On-site request/Due date _____

Comments/Recommendations:

Title of UST Owner/Operator Representative: Store Mgr
Name of UST Owner/Operator Representative:
Mildred Guzman
(Please print)

(Signature)
Other Participants: Juan Martinez, Operator

Name of EPA Inspector/representative:

Charles Zafonte
(Please print)
[Signature]
(Signature)
NA
(Credential Number)

Date of Inspection 5/23/2023 Time _____ AM/PM

Documents Not Available During the On-Site Inspection
Please Provide As Soon As Possible

Location: _____

Facility ID Number: _____

- Tank Registration Certificate
- Operator Training Records (Individuals training or retraining)
- Demonstrate Financial Responsibility
- Automatic Line Leak Detector Test Records – Annual
- Line Leak Test Records – Annual
- Evidence of Spill Prevention
- Evidence of Overfill Prevention
- Tank Release Detection Records
- Vapor Monitoring Records – Monthly (12 Most Recent Months)
- Under Dispenser Containment (Visual inspection or electronic monitoring)
- Site Assessment to Demonstrate Monitor Wells Properly Installed/Located
- Documentation of Compatibility for UST Systems
- Corrosion Protection Inspection Records
- Documentation of Periodic Walk-through Inspection
- Walkthrough Inspection Records – Monthly and Annually
- Other (specify) _____

Additional Recommendations:

This image shows a single sheet of white paper with horizontal ruling lines. The lines are evenly spaced and run across the width of the page. There is no handwriting or other markings on the paper.

Required Fields to be used for ICIS Only

Compliance Monitoring

Activity: UST Inspection

Inspection Conclusion Data Sheet

1) Did you observe deficiencies (areas of concern during the on-site inspection)? *No*

Deficiencies observed: (Put an X for each observed deficiency)

- ☐ Potential failure to complete or submit a notification, report, certification, or manifest
- ☐ Potential failure to follow or develop a required management practice or procedure
- ☐ Potential failure to maintain a record or failure to disclose a document
- ☐ Potential failure to maintain/inspect/repair meters, sensors, and recording equipment
- ☐ Potential failure to report regulated events, such as spills, accidents, etc.

2) If you observed deficiencies, did you communicate the deficiencies to the Facility during the inspection? **Yes / No** *NA*

3) Did you observe the Facility take any actions during the inspection to address the deficiencies noted? **Yes / No** *NA*

If yes, what actions were taken?

4) Did you provide general Compliance Assistance in accordance with the policy on the role of the EPA Inspector in providing Compliance Assistance during Inspections? **Yes / No** *No*

5) Did you provide site-specific Compliance Assistance in accordance with the policy on the role of the EPA Inspector in providing Compliance Assistance during the inspection? **Yes / No** *No*

This report was reviewed and deemed complete by: Reviewer

Signature

Date