

RCRA Compliance Evaluation Inspection Report

1) Inspector and Author of Report

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2) Facility Information

Patrick Air Force Base
1224 Jupiter Street 45 CES/CEIE
Patrick Air Force Base (AFB), Florida 32925-3343
County: Brevard
EPA ID Number: FL2570024404

3) Responsible Official

Brian K. Ellis, Patrick AFB Hazardous Waste Program Manager
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(321) 494-9270

4) Inspection Participants

Brian K. Ellis, AFB Hazardous Waste Program Manager
Danielle Turlington, AFB Environmental Safety Occupational Health
Ted Vital, AFB Maintenance Manager
Mark Pier, AFB Heavy Equipment Shop Supervisor
Patrick Bryk, AFB Crew Chief
Vladimere Ferreira, AFB Crew Chief
Thor Peterson, AFB CTI
Rebecca Fafard, AFB CTI
Miranda Rothenberger, FDEP Inspector
Casey Brock, FDEP Inspector
David Champagne, U.S. EPA Inspector

5) Dates of Inspection

April 7, 2021 09:30 a.m.

6) Applicable Regulations

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

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

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.

Pursuant to Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.17], a LQG may accumulate hazardous waste on-site for 90 days or less without a permit or without having interim status, as required by Section 403.722 of the Florida Statutes, Fla. Stat. § 403.722 [Section 3005 of RCRA, 42 U.S.C. § 6925], provided that the generator complies with the conditions listed in Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.17] (hereinafter referred to as the "LQG Permit Exemption").

7) Purpose of Compliance Evaluation Inspection

On April 7, 2021, Mr. Casey Brock; Inspector and Ms. Miranda Rothenberger; Inspector of the Florida Department of Environmental Protection (FDEP), and David Champagne; Inspector of the U.S. EPA, conducted a routine compliance evaluation inspection of Patrick Air Force Base (Patrick AFB or base) to determine the facility's compliance with state and federal hazardous waste regulations. This was an EPA lead inspection. Patrick AFB was represented by Mr. Brian Ellis, Patrick AFB, Mr. Thor Peterson, CTI and Ms. Rebecca Fafard, CTI. CTI is a company hired by the base to manage the facility's hazardous waste. Upon entering the base, the inspectors introduced themselves, showed their credentials and explained the purpose of the visit. A base access form was required to be filled out to gain access to the base. The facility representatives provided a description of the base and a process-based inspection was conducted.

8) Compliance History

Patrick AFB was last inspected on August 20, 2020 as a large quantity generator of hazardous waste. No violations were identified.

9) Facility Description

Patrick AFB is located at 1224 Jupiter Street 45 CES/CEIE in Patrick Air Force Base, Florida. The most recent Hazardous Waste Generator Notification (EPA Form 8700-12) dated March 19,

2020, characterized the facility as a large quantity generator (LQG) of hazardous waste. The facility was issued a RCRA hazardous waste storage permit that allows for 87, 55-gallon drums of hazardous waste to be stored for up to one year. The base has two gates. The Main East Gate is open 0600-2200, 7 days a week and is located on the North side of the base, closer to Cape Canaveral. The South Gate is open 24-hours and is located on Patrick Drive.

10) Inspection Findings

Civil Engineering TSD Building 947

At the time of the inspection, the AFB was storing hazardous waste inside Building 947. There was a landline phone located on the wall outside the building, a fire extinguisher on each end of the building and one inside. A hazardous waste and no smoking sign were posted, as well as, the emergency contact information. Eyewash station, spill kit, as well as other pertinent personal protective equipment (PPE) were available in Bay 1. Bay's 2-10 were designated for waste storage. Waste is separated according to its characteristic type and stationed on top of secondary containment. The bays with different waste characteristics were separated by a wall. At the time of the inspection there were approximately 34 containers. All waste containers were closed, labeled, and dated. No containers were dated beyond one year from the time of the inspection. One 250-gallon tote of non-regulated aqueous film-forming foam (AFFF) wastewater that is used to clean fire suppression foam was also stored in this building. EPA Hazardous Waste Codes identified on containers at the time of the inspection consisted of: D001, D005, D006, D007, D008, D018, D035, D039, F003, F005 and primarily consisted of waste from aerosols, the gun range, and paint-related waste generation from aircraft maintenance (Photographs 1, 2 of 4).

Air Force Technical Applications Center (AF TAC)

Stationed outside, the AF TAC consisted of 5 lockers separated based on hazard compatibility. Locker numbers 1 and 2 were designated for non-RCRA radioactive waste, locker numbers 3 and 5 were designated for hazardous waste, and locker number 4 was designated for mixed hazardous waste. At the time of the inspection, there were approximately 70-plus containers of varying sizes organized on shelves within the lockers. All containers were labeled, dated, and closed. Waste in this area is generated from lab samples collected from various military operation missions. EPA Waste Codes identified on containers in this area at the time of the inspection consisted of D001, D003, D002, D005, D006, D007, D008, D010, and D011. Oily rags and non-regulated material from resin cartridges were also stored at this location at the time of the inspection (Photographs 3, 4 of 4).

Vehicle Maintenance 45th Space Wing Blue GSA Fleet

The maintenance area generates and collects hazardous waste aerosols, parts washer fluids, parts washer sludge and materials, as well as filters from parts washers. EPA Waste Codes identified at the time of the inspection consisted of: D001, D005, D007, D008, D018, D035, D039 and D040. Used oil is also collected in this area. At the time of the inspection, all 4, 55-gallon containers managing hazardous aerosols, hazardous waste parts washer fluid, parts washer sludge and materials, and parts washer filters were closed and labeled.

Blend Blaster Welding Room

Various types of rusted metal brackets undergo bead blasting in this area. A technical response package has been created for the blasting material and determined to be non-hazardous.

920 Aircraft Phase Maintenance Hanger 630/ 130 Isodock

Hazardous waste generated in this area is from maintenance on aircraft. At the time of the inspection the facility had one (1) 30-gallon container of oily contaminated rags, one (1) 55-gallon container of hydraulic oil, one (1) 30-gallon container of hazardous waste toxic metals (NA3072- EPA Waste Codes: D007, D007, D008), one (1) 30-gallon container of toxic metals (NA3077- EPA Waste Codes: D001, D004, D005, D006, D007, D008, D010, D018, D023, D035, D039, and D040), and one (1) 30-gallon container of DOT non-RCRA flammable solid waste (alcohol, acetone, naptha). A hazardous waste profile was requested for this material.

Pursuant to Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.11], a person who generates a solid waste, as defined in Fla. Admin. Code Ann. r. 62-730.030(1) [40 C.F.R. § 261.2], must make an accurate determination as to whether that waste is a hazardous waste in order to ensure wastes are properly managed according to applicable RCRA regulations articulated in Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.11].

Wheel and Tire

New wheel bearings come packaged in an oil preservative and are used when conducting maintenance on wheels. At the time of the inspection there was a 5-gallon container for toxic metals (EPA Waste Code D006). The wrapping package for wheel bearings, PPE, and oil preservative are managed in this container. A 6-gallon container was used to manage hazardous waste generated from cleaning the wheels (EPA Waste Code D006, D007, D008). Both containers were closed and labeled. A well-washer liquid bath is used for cleaning wheel and tire materials. This wash is sampled prior to each disposal. The last disposal of the material was non-hazardous.

Records

The inspection team conducted a record review of the facility's weekly inspections for the hazardous waste central accumulation area storage location. Training for staff managing hazardous waste and the Contingency Plan were up to date. The contingency plan had been sent to local authorities. A copy of the RCRA permit and application are on site and available for review.

11. Summary

The inspectors conducted the exit meeting with the facility team presenting the preliminary results of the inspection. Patrick AFB was inspected as a large quantity generator of hazardous waste. At the time of the inspection, the facility did not appear to be in compliance with some requirements of RCRA. The inspection concluded at approximately 14:00 hours.

10) Signed



David Champagne
Inspector and Author of Report

5/5/2021

Date

11) Concurrence and Approval

ARACELI
CHAVEZ

Digitally signed by
ARACELI CHAVEZ
Date: 2021.05.05
11:47:01 -04'00'

Araceli B. Chavez
Chief
RCRA Enforcement Section

Date

RCRA CEI Photographs for
Patrick Air Force Base
1224 Jupiter Street 45 CES/CEIE
Patrick Air Force Base (AFB), Florida 32925-3343
EPA ID Number: FL2570024404

Photographs taken by: David Champagne, U.S. EPA
on April 7, 2021
Camera Model: Google Pixel XL



Photograph 1 of 4: Central Accumulation Area



Photograph 2 of 4: Central Accumulation Area



Photograph 3 of 4: Locker Storage



Photograph 4 of 4: Locker Storage