

RCRA Inspection Report

1) Inspector and Author of Report

Alan Newman
RCRA Enforcement Section
Chemical Safety and Land Enforcement Branch
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U.S. Environmental Protection Agency (EPA), Region 4
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2) Facility Information

United States Air Force - Moody Air Force Base (Moody AFB)
23 CES/CEIEC
23 Flying Tiger Way
Moody AFB, GA 31699
EPA ID: GA0570024109

3) Responsible Officials

Greg Haugen, REM
23rd Wing Environmental Specialist
gregory.haugen@us.af.mil
(229) 560-6200 cell

4) Inspection Participants

Greg Haugen	Moody AFB	SSGT Sumpter (609)	Moody AFB
Jason Joiner	Contractor	TSGT Jesse Larson (701)	Moody AFB
Larry Davis	Contractor	TSGT Smith (772)	Moody AFB
Jay Eichler	Contractor	TSGT Sampson (900)	Moody AFB
Mike Frost	Moody AFB	TSGT Legarda (900)	Moody AFB
Greg Lee	Moody AFB	TSGT Tarell Walker (900)	Moody AFB
Patti Clark	Moody AFB	SSGT True (Logistics)	Moody AFB
TSGT Kristopher Cooper	Moody AFB	Tiffany Leech (Logistics)	Moody AFB
SRA Justice Robinson (755)	Moody AFB	SSGT McCormick (Logistics)	Moody AFB
SSGT Robbie Carpenter (711)	Moody AFB	TSGT Cody Dickerson (702)	Moody AFB
SRA Coon (644)	Moody AFB	SSGT Raeshaun Stephens (1105)	Moody AFB
TSGT Diaz (658)	Moody AFB	Josh Hayes	GAEPD
SRA Cruz (672)	Moody AFB	Alan Newman	USEPA

5) Date and Time of Inspection

September 27, 2022; 1:00 pm to 5:45 pm through September 28, 2022; 7:30 am to 4:00 pm.

6) **Applicable Authority**

Resource Conservation and Recovery Act (RCRA) Sections 3002 (42 U.S. Code – Annotated U.S.C.A. 6925 and 6927), and 40 Code of Federal Regulation (C.F.R.) Parts 260 - 270, 273, 278, & 279; Georgia Hazardous Waste Management Act, Ga. Code Ann. § 12-8-60 *et seq.*, and Georgia Hazardous Waste Management Rules, Ga. Comp. R. and Regs. 391-3-11.01 to 391-3-11.18 (2016 and 2018); and Hazardous Waste Permit HW-077(CA).

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 Ga. Comp. R. and Regs. 391-3-11-.02(1) [40 C.F.R. § 260.10], a large quantity generator of hazardous waste (LQG) is a generator who generates greater than or equal to 1,000 kilograms (2,200 pounds) of non-acute hazardous waste in a calendar month.

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.08(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 12-8-66 of the GHWMA, Ga. Code Ann. § 12-8-66 [Section 3005 of RCRA, 42 U.S.C. § 6925], provided that the generator complies with the conditions listed in Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.17] (hereinafter referred to as the “LQG Permit Exemption”).

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.18 (2006) [40 C.F.R. § 273.9 (2016)], a “Small Quantity Handler of Universal Waste” (SQHUW) is a Universal Waste handler who does not accumulate 5,000 kilograms or more total of Universal Waste (batteries, pesticides, mercury-containing equipment, or lamps, calculated collectively) at any time.

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.15(a)], a generator may accumulate as much as 55 gallons of non-acute hazardous waste in containers at or near any 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 12-8-66 of the GHWMA, Ga. Code Ann. § 12-8-66 [Section 3005 of RCRA, 42 U.S.C. § 6925], and without complying with Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.16(b) or § 262.17(a)], except as required in Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.15(a)(7) and (8)], provided that the generator complies with the satellite accumulation area conditions listed in Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.15(a)] (hereinafter referred to as the “SAA Permit Exemption”).

GAEPD issued a hazardous waste facility permit number HW-077(CA) to Moody AFB on September 24, 2014 for RCRA Corrective Action.

7) **Purpose of Inspection**

The purpose of this inspection was to conduct an unannounced compliance evaluation inspection to determine Moody AFB compliance with the applicable requirements of RCRA and the corresponding Georgia regulations and permits. This was an EPA lead inspection.

8) Previous Inspection History

GAEPD conducted one RCRA CEI at the subject facility since 2016. On April 26, 2016, GAEPD conducted the most recent RCRA CEI at the subject facility and found no apparent violations of RCRA's requirements.

9) Facility Description

The base occupies approximately 10,968 acres and operations began here in 1941. There are approximately 3,500 personnel stationed at Moody AFB. The facility has a perimeter fence with entry points that are staffed by armed Air Force personnel. Moody AFB is a large quantity generator of hazardous waste, and generator of used oil, and small quantity handler of universal waste. Moody AFB last filed a notification of hazardous waste activity on June 22, 2022. Moody AFB generates the following hazardous waste codes: D001, D002, D005, D006, D007, D008, D009, D010, D011, D018, D023, D034, D035, D036, D039, D040, F001, F002, F003, F005, P001, U002, U154, U220. Moody AFB operates one central accumulation area (CAA), also known as a central accumulation point (CAP) and approximately sixty-eight (68) satellite accumulation areas (SAAs) also known as satellite accumulation points (SAPs).

GAEPD issued a hazardous waste facility permit to Moody AFB on September 24, 2014, which expires on September 24, 2024. This permit addresses RCRA corrective action for a number of solid waste management units at the base. RCRAInfo records indicate that the remedy was constructed in 2010. The NAICS # for Moody AFB is 928110 – National Security.

Moody AFB is located in South Georgia, ten miles northeast of Valdosta in Lowndes and Lanier counties. The Base has been in operation since 1941.

Moody AFB is home to the 23d Wing. The 23rd Wing is comprised of five groups: 23rd Fighter Group, 347th Rescue Group, 23rd Maintenance Group, 23rd Medical Group, and 23rd Mission Support Group. The majority of activities at Moody AFB pertain to military training and range activities, maintenance of aircraft, vehicles, equipment, and administrative support.

10) Opening Conference

On September 27-28, 2022, EPA inspector Alan Newman, accompanied by GAEPD inspector Josh Hayes, arrived at Moody AFB at approximately 1:00 pm. Greg Haugen, 23rd Wing Environmental Specialist, immediately received the inspectors. Greg Haugen, and the inspectors were joined by Jason Joiner, Larry Davis, and Jay Eichler, for the opening conference. The inspectors introduced themselves, showed their credentials to Greg Haugen, and explained the purpose of the visit. The inspectors described the anticipated use of equipment (digital camera) during the inspection and provided a request for records. The inspectors discussed the company's

ability, pursuant to 40 C.F.R. §2.203, to assert a business confidentiality claim for information submitted to EPA. The base did not assert a business confidentiality claim. The inspection participants also discussed health and safety protocols and required personal protective equipment before Greg Haugen and Jay Eichler led the inspectors on a tour of the Facility operations.

Greg Haugen provided an overview of the facility's history and current operations during the opening conference. The company does not appear to meet the Small Business Regulatory Enforcement Fairness Act's classification of a "small business," which is generally set by the Small Business Administration using the business' SIC/NAICS code and annual receipts or number of employees. Therefore, the EPA inspector did not provide a copy of the agency's information sheet for small businesses, which can be found at <https://www.epa.gov/compliance/small-business-resources-information-sheet>.

11) **Inspection Observations**

Moody AFB performs maintenance on aircraft and generates used oil; grease; paint and solvent waste; batteries; fuel-contaminated rags, pads, and booms; plastic bead contaminated with metals; spill residues; universal waste lamps; adhesives; and fuel, oil, and paint filters. These wastes are accumulated in various size containers at SAAs located near the generating process. Once a container of hazardous or non-hazardous waste is full, the generating organization contacts the HAZ MART facility to arrange transportation of the container to the CAP. Moody AFB ensures that hazardous wastes are not stored at the CAP for more than 90 days before being transported offsite for disposal.

- SAPs

The inspection team toured thirty-one (31) of the sixty-eight (68) designated SAPs in multiple buildings:

Building Number	SAP numbers	Building (Shop) Name
A-10 Flight Line		
744	133, 134, 147	A-10 Paint Barns
717	139, 140, 149, 150	Paint and Fiber Glass Booths
785	73, 84	Sheet Metal Shop
755	21	Aerospace Ground Equipment
711	142	Egress
932-B	59	HAZ MART
C-130 Flight Line		
644	10	C-130 Iso Dock
648	31	71 AMU CTK
646	14	Fuel Hanger
658	35	Gun Shop
672	27, 113	41 st HMU Shop

609	65	HH60 ISO
701	106, 155	Sheet Metal Shop
4127 (4130)	118	Hush House
730	112	Fuel Cell
731	109	Armament Flight
772	104	74 th Support Section
702	32	NDI Lab
733	119	TF34 Engine Support Shop
Medical Center		
900	34	Pharmacy
900	87	Dental Clinic
Munitions Maintenance Area		
1105	100	Equipment maintenance
1120	144	Conventional Maintenance

Each designated satellite accumulation container at each SAP was labeled, closed, and in good condition (Photos 1-23).

- Blast Media Room Building 717

The inspection team noted multiple blast media booths in Building 717. Each booth was connected to a waste collection container. There were seven 55-gallon metal containers and one 25-gallon metal container used to accumulate spent blast media (Photos 24-30). Facility personnel stated that these wastes are managed as a hazardous waste. These containers were not labeled with the words hazardous waste or with an indication of the hazard. Four of these containers were located underneath the baghouses on the exterior of Building 717. These containers did not appear to be under control of the operator of the process generating the waste. The filters used in blast media booths are managed as hazardous waste when spent. Moody AFB documented compliance in this area in an email on October 21, 2022.

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.15(a)(5)], which is a condition of the SAA Permit Exemption, a generator is required to mark or label its containers (i) with the words “Hazardous Waste” and (ii) with an indication of the hazards of the contents.

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.15(a)], a condition of the SAA Permit Exemption, a generator may accumulate as much as 55 gallons of non-acute hazardous waste in containers at or near any point of generation where wastes initially accumulate which is under the control of the operator of the process generating the waste, without a permit or interim status and without complying with the requirements of parts 124, 264 through 267, and 270 of this chapter, provided that all of the conditions for exemption in this section are met. A generator may comply with the conditions for exemption in this section instead of complying with the conditions for exemption in § 262.16(b) or § 262.17(a), except as required in § 262.15(a)(7) and (8).

- Medical Center

The inspection team toured the Medical Center which is comprised of medical doctors, dentists, and a pharmacy among other activities. Moody AFB is required to notify the State of Georgia under new RCRA Subpart P requirements.

- Building 900 - Pharmacy

In the pharmacy, Moody AFB was accumulating empty warfarin containers and expired warfarin pills in SAP 34 as mentioned above; this container was empty on the day of the inspection (Photo 31). Additionally, Moody AFB was accumulating expired or waste pills in two 5-gallon containers filled with activated carbon to treat the pills to render them unrecoverable and unusable (Photo 32). These containers were provided by Rx Destroyer for Drug Disposal. These two containers were not labeled, had some waste on the top of the containers, and were not documented of how long they had been accumulating non-credible hazardous waste pharmaceuticals. The HAZ MART personnel were unaware of this waste stream at the time of the inspection. Pharmacy personnel stated that the Logistics group was the one that provided and removed these containers. According to personnel in Logistics, these containers were disposed of in a non-hazardous waste dumpster and hauled to a municipal landfill with the base trash. All personnel were instructed to no longer dispose of the buckets in this manner and store them. After the inspection team left the Logistics, EPA headquarters was contacted and consulted about this situation. It was determined that the pill disposal buckets should be labeled as hazardous waste and when full should be sent to a hazardous waste incinerator to meet the new RCRA Subpart P requirements. Moody AFB documented compliance in this area in an email on October 21, 2022.

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.19 [40 C.F.R. § 266.501], a healthcare facility is subject to the following in lieu of Parts 262 through 265: (1) Sections 266.502 and 266.505 through 266.508 of this subpart with respect to the management of: (i) Non-credible hazardous waste pharmaceuticals, and (ii) Potentially creditable hazardous waste pharmaceuticals if they are not destined for a reverse distributor; and (2) Sections 262.502(a), 266.503, 266.505 through 266.507, and 266.509 of this subpart with respect to the management of potentially creditable hazardous waste pharmaceuticals that are prescription pharmaceuticals and are destined for a reverse distributor.

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.19 [40 C.F.R. § 266.502], a healthcare facility must notify that it is a healthcare facility operating under this subpart, must ensure that all personnel that manage non-credible hazardous waste pharmaceuticals are thoroughly familiar with proper waste handling and emergency procedures, must determine whether generated solid waste that is a non-credible pharmaceutical must determine whether that pharmaceutical is a hazardous waste pharmaceutical in order to determine whether the waste is subject to this subpart, must store hazardous waste pharmaceuticals in structurally sound containers, must keep containers of non-credible hazardous waste pharmaceuticals closed and secured, and must label or clearly mark each

container of non-credible hazardous waste pharmaceuticals with the phrase “Hazardous Waste Pharmaceuticals,” among other requirements.

- Building 900 - Laboratory

Moody AFB operates a laboratory in the Medical Center. The inspection team asked if there were any wastes generated in the laboratory. Facility personnel were unsure if wastes were generated here or not. The inspection team did not note any waste on site on the day of the inspection but also noted the possibility of generating waste due to the activities being conducted in the laboratory. Moody AFB stated that they would conduct an audit of all reagents used in the laboratory and make accurate waste determinations where necessary. This was an area of concern for the inspection team. Moody AFB documented compliance in this area in an email on October 21, 2022. According to the documentation, there was no hazardous waste reagents in this laboratory.

- Building 900 (Dental Clinic)

The Dental Clinic housed one SAA which contained waste amalgam (D011). Facility personnel accumulates waste amalgam in 1-liter red containers at dentist chairs in the clinic (Photo 33). These red containers are emptied daily into a five-gallon bucket located at the central SAA for the clinic, SAP 87. The inspection team noted that there were some red containers that were continuing to store small amounts of amalgam in the SAA. These containers were emptied into the designated SAA container during the inspection. Moody AFB should ensure that all waste is emptied daily into the SAA container.

- HAZ MART (CAA or CAP)

Moody AFB manages hazardous waste in a CAA and an SAA in Building 932-B, the HAZ MART. This area is a secured, fenced-in area with a roof (Photo 34). Signs were posted on the HAZ MART's fenced gate which read “Hazardous Waste Storage Area Authorized Personnel Only”, “Danger, No Smoking, Matches or Open Flames”, and “KEEP OUT Authorized Personnel Only”. Moody AFB manages ignitable, reactive, and universal waste in this CAA. The inspection team compared the printed inventory of 117 containers with the actual containers in storage with no discrepancies (Photos 35-42).

The HAZ MART is equipped with a land line telephone just outside the gate for dialing 911 in case of emergency to request assistance from local police departments, fire departments, or state or local emergency response teams; it is equipped with portable fire extinguishers, specialty fire extinguishers for reactives (Class D Navy 125 S powder), spill control equipment, and decontamination equipment; and it is equipped with water to supply water hose streams.

Moody AFB also manages universal waste lamps and batteries in the HAZ MART. According to the records provided during the inspection, the facility's most recent shipment of universal waste batteries off site was on September 26, 2022, sent to Clean Earth facility in Alabama.

There were multiple containers of universal waste lamps and batteries stored in the HAZ MART on the day of the inspection which were closed and marked with an accumulation start date and were labeled as to their contents. The oldest date observed on any container of universal waste was March 30, 2022, of spent broken fluorescent lamps (Photos 39-41). SAP 59 was in the HAZ MART (Photo 43). Each container was labeled, in good condition, closed, and provided with adequate aisle space.

- Record Review

- Contingency Plan: The actions that facility personnel should take in response to an emergency are described in the facility's Integrated Contingency Plan, which was last updated in April 2020. The plan describes actions facility personnel must take in response to fires, explosions, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water at the facility. The plan describes arrangements agreed to with the local police department, fire department, other emergency response teams, emergency response contractors, equipment suppliers, local hospitals, or the Local Emergency Planning Committee. The plan lists the titles and emergency telephone numbers for persons identified as emergency coordinators. The Mission Support Group Commander is listed as the primary emergency coordinator; and the other individuals are listed in the order in which they will assume responsibility as alternates. The plan includes a list of all emergency equipment at the facility. The list includes fire extinguishing systems, spill control equipment, communications and alarm systems, and decontamination equipment. The list appears to be up to date. The plan includes the location and a physical description of each item on the list, and a brief outline of its capabilities. The plan includes an evacuation plan for personnel. This plan describes signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes.

The quick reference guide includes the types/names of hazardous waste in layman's terms and the associated hazard associated with each hazardous waste present at any one time; the estimated maximum amount of each hazardous waste that may be present at any one time; the identification of any hazardous wastes where exposure would require unique or special treatment by medical or hospital staff; a map of the facility showing where hazardous wastes are generated, accumulated and treated and routes for accessing these wastes; a street map of the facility in relation to surrounding businesses, schools and residential areas; the locations of water supply; the identification of on-site notification systems; and the name of the emergency coordinator(s) and emergency telephone number(s).

- Training Records: The inspectors reviewed facility job descriptions and employee names that were provided for primary monitor, alternate monitor, environmental specialist among others. Each description did include the requisite skill, education, or other qualifications, and duties of facility personnel assigned to that position. Moody AFB provided a written description of the type and amount of both introductory and continuing training to be given to each person filling the positions listed above. The

inspectors reviewed records of employee hazardous waste training completed in 2020 through 2022.

- Manifests: The inspectors reviewed available hazardous waste manifest records and land disposal restriction forms for shipments of hazardous waste sent since 2019. Hazardous waste manifest records show that a myriad of hazardous waste solids and liquids are routinely shipped to Clean Earth of Alabama (ALD981020894), Veolia ES Technical Solutions (ILD098642424), and Giant Resource Recovery-Attalla, Inc (ALD70513767). The most recent shipment was made on September 26, 2022. The records included signed return copies of manifests for shipments.
- Inspections: The inspectors reviewed Moody AFB's available records of inspections of the hazardous waste central accumulation area (CAA) for last three years. The inspection log includes a checklist to record observations about leaking containers and for deterioration of containers caused by corrosion or other factors. The records include the date and time of the inspection and the name, signature and initials of the employee conducting the inspection. Each week, the employee records notations of observations and necessary follow-up actions for the inspected areas.

12) Closing Conference

The inspectors conducted the exit meeting at 4:00 p.m. with Greg Haugen, Greg Lee, Patti Clark, and Lori Burnam. During this meeting, the inspectors stated their preliminary conclusions of the inspection. Moody AFB agreed to provide an updated list of SAPs included in the QRG by October 14, 2022. On October 5, 2022, Greg Haugen provided the requested documentation in an email to Alan Newman. Mr. Haugen also provided updates on other issues noted during the inspection in an email dated October 21, 2022 and updated the information on November 16, 2022.

13) Summary of Observations

Based on the observations made during the inspection, Moody AFB was apparently deficient with the following RCRA requirements:

- **Pursuant to Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.15(a)(5)], which is a condition of the SAA Permit Exemption, a generator is required to mark or label its containers (i) with the words “Hazardous Waste” and (ii) with an indication of the hazards of the contents.**
- **Pursuant Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.15(a)], a condition of the SAA Permit Exemption, a generator may accumulate as much as 55 gallons of non-acute hazardous waste in containers at or near any point of generation where wastes initially accumulate which is under the control of the operator of the process generating the waste, without a permit or interim status and without complying with the requirements of parts 124, 264 through 267, and 270 of this chapter, provided that all of**

the conditions for exemption in this section are met. A generator may comply with the conditions for exemption in this section instead of complying with the conditions for exemption in § 262.16(b) or § 262.17(a), except as required in § 262.15(a)(7) and (8)

- Pursuant Ga. Comp. R. and Regs. 391-3-11-.19 [40 C.F.R. § 266.501], a healthcare facility is subject to the following in lieu of Parts 262 through 265: (1) Sections 266.502 and 266.505 through 266.508 of this subpart with respect to the management of: (i) Non-creditable hazardous waste pharmaceuticals, and (ii) Potentially creditable hazardous waste pharmaceuticals if they are not destined for a reverse distributor; and (2) Sections 262.502(a), 266.503, 266.505 through 266.507, and 266.509 of this subpart with respect to the management of potentially creditable hazardous waste pharmaceuticals that are prescription pharmaceuticals and are destined for a reverse distributor.
- Pursuant Ga. Comp. R. and Regs. 391-3-11-.19 [40 C.F.R. § 266.502], a healthcare facility must notify that it is a healthcare facility operating under this subpart, must ensure that all personnel that manage non-credible hazardous waste pharmaceuticals are thoroughly familiar with proper waste handling and emergency procedures, must determine whether generated solid waste that is a non-credible pharmaceutical must determine whether that pharmaceutical is a hazardous waste pharmaceutical in order to determine whether the waste is subject to this subpart, must store hazardous waste pharmaceuticals in structurally sound containers, must keep containers of non-credible hazardous waste pharmaceuticals closed and secured, must label or clearly mark each container of non-credible hazardous waste pharmaceuticals with the phrase “Hazardous Waste Pharmaceuticals,” among other requirements.

14) **List of Appendices**

Appendix 1 – Photo Log:
Sixteen Photos taken on: September 27-28, 2022
Photos taken by: Alan Newman
Photos taken with: Panasonic Lumix
EPA Property Tag: S75870

15) **Signed**

ALAN NEWMAN

Digitally signed by ALAN NEWMAN
Date: 2022.12.09 08:23:54 -05'00'

Alan Newman
Environmental Engineer

Date

Concurrence

ARACELI CHAVEZ

Digitally signed by ARACELI
CHAVEZ

Date: 2022.12.09 10:55:37 -05'00'

Araceli B. Chavez

Date

Chief

RCRA Enforcement Section

Chemical Safety and Land Enforcement Branch

Enforcement and Compliance Assurance Division

Appendix 1

Photograph Log:

Photographs taken by Alan Newman
Photographs taken with Lumix Digital
Camera
EPA Property Tag: S75870



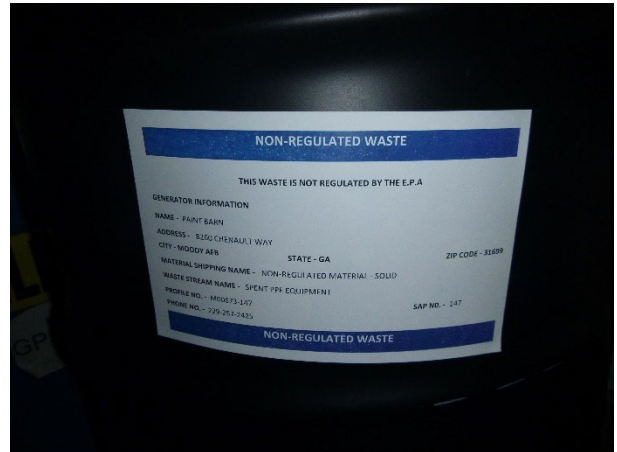
Photograph 1: Building 744 - SAP 133.



Photograph 3: Building 744 - SAP 147.



Photograph 2: Building 744 - SAP 134.



Photograph 4: Building 744 - SAP 147.



Photograph 5: Building 717 - SAP 149.



Photograph 7: Building 717 - SAP 140.



Photograph 6: Building 717 - SAP 150.



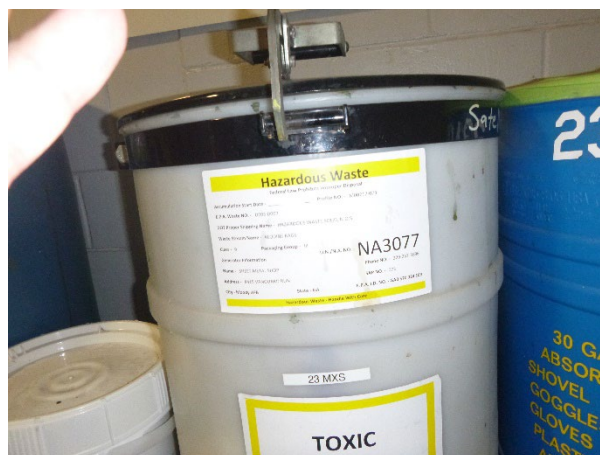
Photograph 8: Building 717 - SAP 139.



Photograph 9: Building 785 - SAP 84.



Photograph 11: Building 785 - SAP 73.



Photograph 12: Building 785 - SAP 73.



Photograph 10: Building 785 - SAP 73.



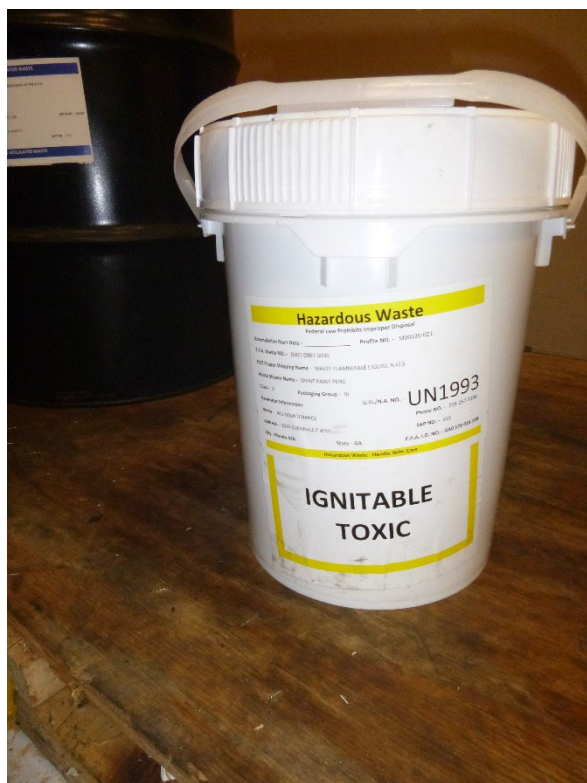
Photograph 13: Building 755 - SAP 21.



Photograph 14: Building 755 - SAP 21.



Photograph 16: Building 755 - Batteries.



Photograph 15: Building 755 - SAP 21.



Photograph 17: Building 755 - Batteries.



Photograph 18: Building 672 – SAP 27.



Photograph 20: Building 609 – SAP 65.



Photograph 19: Building 672 – SAP 27.



Photograph 21: Building 4127 – SAP 118.



Photograph 22: Building 731 – SAP 109.



Photograph 23: Building 702 – SAP 32.



Photograph 24: Building 717 - Blast Media Booths.



Photograph 25: Building 717 - Blast Media Booths.



Photograph 26: Building 717 - Blast Media Booths.



Photograph 27: Building 717 - Blast Media Booths.



Photograph 28: Building 717 - Blast Media Booths.



Photograph 29: Building 717 - Blast Media Booths.



Photograph 30: Building 717 - Blast Media Booths.



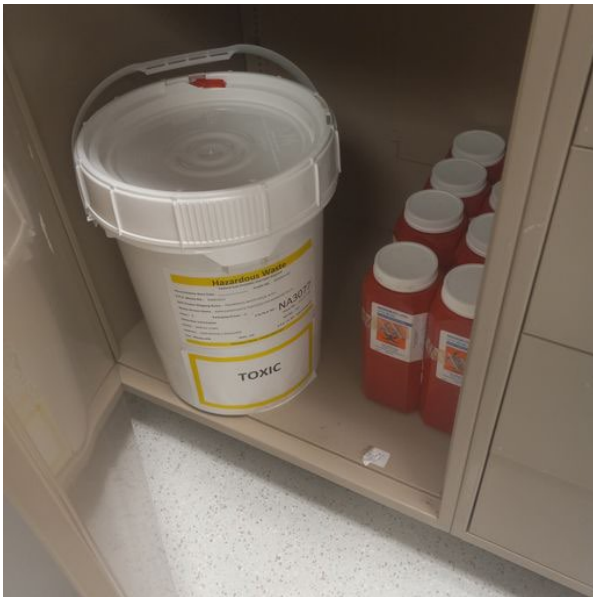
Photograph 31: Building 900 – SAP 34.



Photograph 32: Building 900 - Pharmacy.



Photograph 34: Building 932-B - Central Accumulation Point.



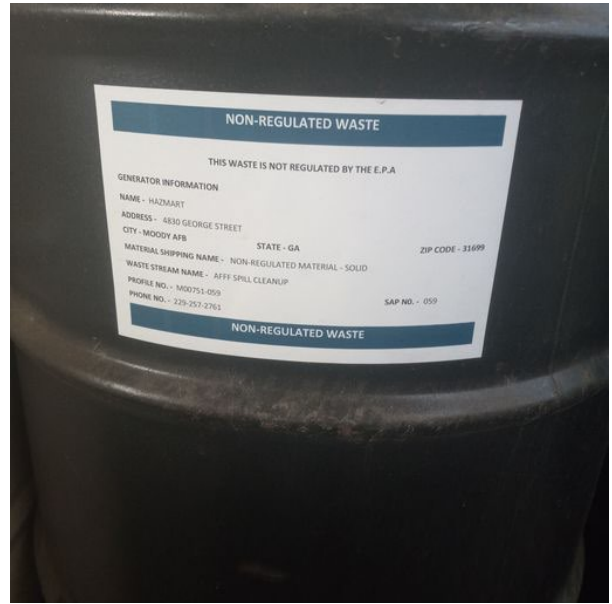
Photograph 33: Building 900 – SAP 87.



Photograph 35: Building 932-B - Central Accumulation Point.



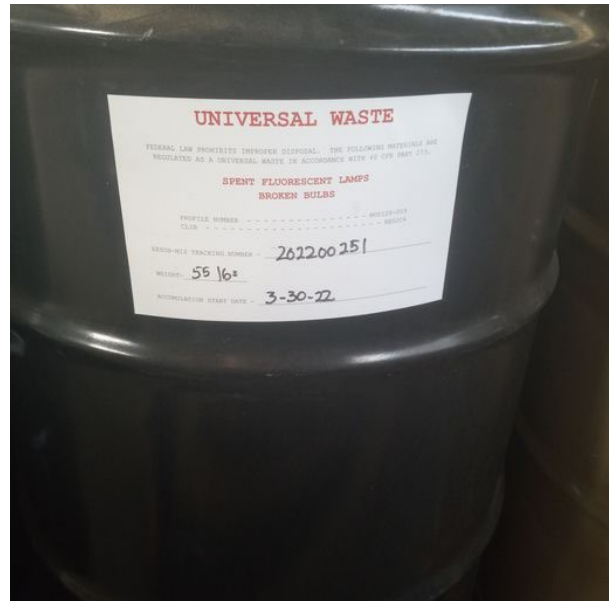
Photograph 36: Building 932-B - Central Accumulation Point.



Photograph 38: Building 932-B - Central Accumulation Point.



Photograph 37: Building 932-B - Central Accumulation Point.



Photograph 39: Building 932-B - Central Accumulation Point.



Photograph 40: Building 932-B - Central Accumulation Point.



Photograph 42: Building 932-B - Central Accumulation Point.



Photograph 41: Building 932-B - Central Accumulation Point.



Photograph 43: Building 932-B – SAP 59.