

RCRA Inspection Report

1) Inspector and Author of Report

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

Marine Corp Air Station New River
AS3525 Perimeter Road
Jacksonville, North Carolina 28545

EPA ID#: NC8170022570
NAICS #: 921190 – Other General Government
Support

3) Responsible Officials

Gregory R. Ottey
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4) Inspection Participants

Gregory R. Ottey, MCAS New River
Michael S. Rogers, MCAS New River
Thomas R. Conklin, MCAS New River

Wes Hare, NCDEQ
Laurie Benton DiGaetano, USEPA

5) Date and Time of Inspection

June 11, 2024 at 8:45 AM

6) Applicable Regulations¹

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; and The North Carolina Solid Waste Management Law, N.C.G.S. § § 130A-17 to -28 and 130A-290 to - 310.22, and North Carolina Hazardous Waste Management Rules, 15A NCAC 13A .0101 to .0119.

¹ As the State's authorized hazardous waste program operates in lieu of the federal RCRA program, the citations of those authorized provisions will be to the authorized State program. However, for ease of reference, the federal citations will follow in brackets.

Pursuant to 15A NCAC 13A .0102(b) [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 15A NCAC 13A .0119(a) [40 C.F.R. § 273.9], a small quantity handler of universal waste (SQHUW) is a universal waste handler who does not accumulate 5,000 kilograms or more of universal waste (batteries, pesticides, mercury-containing equipment, lamps, or aerosol cans, calculated collectively) at any time.

Pursuant to 15A NCAC 13A .0107(a) [40 C.F.R. § 262.17], an LQG may accumulate hazardous waste on-site for 90 days or less without a permit or without having interim status, as required by Sections 130A-294(c) and (g) of the NCSWML, N.C.G.S. § 130A-294(c) to (g) [Section 3005 of RCRA, 42 U.S.C. § 6925], provided that the generator complies with the conditions listed in 15A NCAC 13A .0107(a) [40 C.F.R. § 262.17] (hereinafter referred to as the “LQG Permit Exemption”).

Pursuant to 15A NCAC 13A .0107(a) [40 C.F.R. § 262.15(a)], a generator may accumulate as much as 55 gallons of non-acute hazardous waste in containers at or near 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 Sections 130A-294(c) and (g) of the NCSWML, N.C.G.S. § 130A-294(c) to (g) [Section 3005 of RCRA, 42 U.S.C. § 6925], and without complying with 15A NCAC 13A .0107(a) [40 C.F.R. § 262.16(b) or § 262.17(a)], except as required in 15A NCAC 13A .0107(a) [40 C.F.R. § 262.15(a)(7) and (8)], provided that the generator complies with the satellite accumulation area conditions listed in 15A NCAC 13A .0107(a) [40 C.F.R. § 262.15] (hereinafter referred to as the “SAA Permit Exemption”).

7) Purpose of Inspection

The purpose of this inspection was to conduct an unannounced compliance evaluation inspection to determine Marine Corp Air Station New River (MCAS New River) compliance with the applicable requirements of RCRA and the corresponding North Carolina regulations. This was an EPA lead inspection.

8) Facility Description

The Marine Corps Air Station (MCAS) New River is the primary United States Marine Corps helicopter base on the East Coast which supports aircrew training for the helicopter/tilt rotor groups operated by Marine Corps aviation units. The installation includes approximately 2,600 acres, which are owned by the U.S. Department of Defense. Although the MCAS New River is part of the Marine Corps Base Camp Lejeune, it operates as a separate entity providing aviation support, force protection, infrastructure, and community services to promote the readiness, sustainment, and quality of life for military forces, tenant commands, personnel, and their families. MCAS New River employs approximately 7,000 military and civilian personnel at the facility, and operates twenty-four hours per day, seven days per week.

The installation support units at MCAS New River include: the Headquarters and Headquarters Squadron; the Center for Naval Aviation Technical Training, which provides technical training in the operational maintenance and repair of aeronautical equipment and systems; the Marine Air Control Squadron 2, which conducts air operations in support of the Marine Forces to include offensive air support, antiair warfare, assault support, aerial reconnaissance, electronic warfare, and control of aircraft and missiles; and the Second Marine Aircraft Wing Aviation Training Site, which provides live and virtual training required by Marine Aviation training and readiness standards. The MCAS New River is also the East Coast home of the Marine Corps' variant of the V-22 Osprey, which has the ability to fly like a plane, and take off and land like a helicopter.

The MCAS New River has operated as a large quantity generator (LQG) of hazardous waste at this location for well over thirty years. The installation most recently notified as an LQG as part of the biennial report, which was submitted on February 29, 2024. According to previous biennial reports, hazardous wastes generated at the installation include: D006 used solvent rags; D002, D007 unused pasa gel; D005, D006, D008 weapons cleaning debris; D002, D007 alodine (chromic acid); D001 expired acetone; D002, D005, D006, D007, D008, D010 used act turbo strip and act turbo seal; D002 sealants/adhesives; D001, D035 unused methyl ethyl ketone (MEK); D002, F002, U080 methylene chloride based paint stripper; D001 unused thinner; D002 unused act turbo strip; D007 used pasa gel rags/debris; D005, D006 used red parts washer fluid; D002 unused electroclean (sodium hydroxide); D008 Ozzy Juice filters/debris used in weapons cleaning; D006, D007 cadmium plating rags/debris; D002 corrosion removing compound; D001 unused calcium hypochlorite; D002 unused sulfuric acid, electrolyte; D002 soldering flux; D005, D009 crushed fluorescent bulbs; D002, D006 cadmium plating solution; D001, D002 paint (sempen part B); D002 hydrochoric acid (muratic acid); D001 insecticide, wasp spray; D005, D006, D007, D008 parts washer filter/debris; D001, D007 waste paint; D001 silver parts washer liquid; D011 silver parts washer liquid; D005, D006, D007 paint booth filter; D006, D007 down draft table filter; D002, D007 chromate conversion coating; D001 paint (part A); D005, D006, D007, D008 paint stripper/remover rags and clean up debris; D004, D007 alodine rinse water; D002 solvent corrosive; D001 unused ethanol; F002 compressor oil; and D005, D006, D007, D008 blast media.

Installation personnel explained that the hazardous materials management area serves as the central location for coordinating the purchase, receipt, storage, and distribution of hazardous material products and the collection, storage, and disposal of hazardous wastes. Hazardous materials management activities are coordinated by three staff members of the environmental team and six-to-eighteen marines in the material handling group. Hazardous wastes are initially managed in designated satellite accumulation areas (SAAs) before they are brought to the central accumulation area (CAA) at the hazardous materials management area. When a container of hazardous waste is ready for pick-up from an SAA, the environmental team receives an email request for pick-up. Members of the material handling group may make a special trip to perform the requested pick-up, or personnel responsible for individual SAAs may deliver the container of waste to the CAA. Material handling personnel also perform daily "milk-runs" to deliver hazardous material to areas within the installation, and containers of hazardous

waste may also be picked up along those delivery routes. Hazardous wastes accepted at the CAA may be consolidated prior to storage and preparation for off-site shipment.

9) Previous Inspection History

North Carolina Department of Environmental Quality (NCDEQ) has conducted two RCRA CEIs at the subject facility over the past ten years and found a total of four potential violations during those inspections.

On February 17, 2022, the NCDEQ conducted the most recent RCRA CEI at the subject facility and found one apparent violation of RCRA's requirements for annual hazardous waste training. As a result, the NCDEQ issued a written notice to MCAS New River on March 1, 2022, and later verified that the facility had returned to compliance during a Compliance Scheduled Evaluation on April 8, 2022.

10) Opening Conference

On June 11, 2024, EPA inspector Laurie Benton DiGaetano, accompanied by NCDEQ inspector Wes Hare, arrived at MCAS New River at approximately 8:45 a.m. Greg Ottey, Hazardous Waste Manager, and Michael Rogers, Supervisory Environmental Protection Specialist, immediately received the inspectors. During the opening conference, the inspectors introduced themselves, showed their credentials to Greg Ottey, 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 Small Business Regulatory Enforcement Fairness Act's classification of a "small business" is generally set by the Small Business Administration using the business' SIC/NAICS code and annual receipts or number of employees. A copy of the EPA's information sheet for small businesses can be found at <https://www.epa.gov/sites/production/files/2017-06/documents/smallbusinessinfo.pdf>. The EPA inspector also 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 facility did not assert a business confidentiality claim.

Greg Ottey and Michael Rogers provided an overview of the facility's history and current operations during the opening conference. The inspection participants also discussed health and safety protocols and required personal protective equipment before Greg Ottey led the inspectors on a tour of the Facility operations.

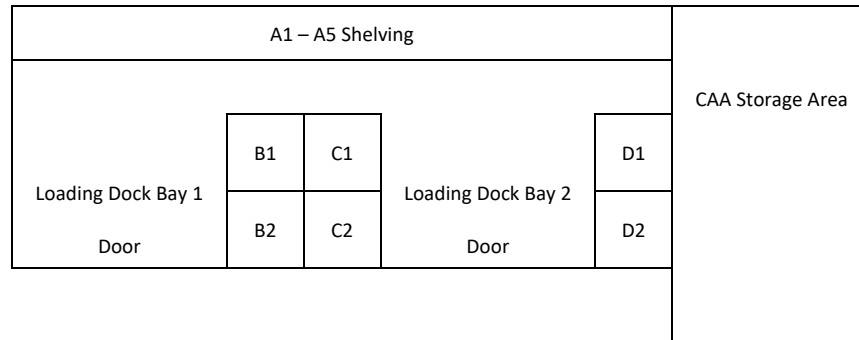
11) Inspection Observations

Hazardous Materials Management Area (HMMA) with Central Accumulation Area (CAA):

The inspection tour began at the HMMA, where the hazardous waste CAA is segregated into the collection area and the storage area. Containers of hazardous waste that are suitable for consolidation prior to storage and preparation for off-site transportation are identified as they arrive at the HMMA. Personnel transfer wastes from these containers into consolidation containers that are staged in the collection area of the CAA. The collection area includes a

single row with five shelving bays (A1 through A5) facing the loading dock bay doors; one row with two shelving bays (B1 and B2) that extend into the building from one side of the loading dock bay door; one row with two shelving bays (C1 and C2) that extend into the building from one side of a second loading dock bay door; and one row with two shelving bays (D1 and D2) that extend into the building from the other side of the second loading dock bay door. Once full, the collection containers are transferred to the CAA storage area, which is separated from the collection area by a chain link fence. Although not to scale, Figure 11.1 provides a general layout of the CAA at the HMMA:

Figure 11.1:



The CAA is equipped with an internal fire alarm system; it is equipped with a telephone capable of summoning emergency assistance from local police departments, fire departments, or state or local emergency response teams; it is equipped with portable fire extinguishers, spill control equipment, and decontamination equipment; and it is identified with a “no-smoking” sign posted on the outside of the building.

The Collection Area includes a single row with five shelving bays (A1 through A5); one row with two shelving bays (B1 and B2); one row with two shelving bays (C1 and C2); and one row with two shelving bays (D1 and D2). Containers arriving at the CAA enter through the loading dock bay door. Partial containers are typically consolidated into dedicated containers located in the CAA Collection Area:

- Bay A1 (Photo 1) is identified for consolidating Nickle-Cadmium Dry-Solid Batteries, Lithium-Ion Batteries, Nickle Batteries Dry, and Lead Acid Batteries. The inspectors observed two wooden pallets in this bay. One pallet held a 30-gallon cardboard box, which was labeled for accumulating universal waste nickle cadmium batteries, and one 55-gallon container, which was labeled for accumulating universal waste lithium-ion batteries. The second pallet contained one 30-gallon cardboard box, which was labeled for accumulating universal waste nickel batteries.
- Bay A2 (Photo 2) is identified for consolidating Aircraft Batteries and Nickel-Cadmium Batteries. The inspectors observed two wooden pallets in this bay. One pallet held a collection of used aircraft batteries. Facility representatives explained that used aircraft batteries are brought here for management and recycling when they can no longer be maintained for continued use on-site. The batteries were not labeled with the words “universal waste.”

Pursuant to 15A NCAC 13A .0119(b) [40 C.F.R. § 273.14(a)], a small quantity handler of universal waste (SQHUW) must identify the type of universal waste by labeling or marking each universal waste battery or container in which the batteries are contained clearly with one of the following phrases: “Universal Waste – Battery(ies), or “Waste Battery(ies),” or “Used Battery(ies).”

- Bay A3 (Photo 3) is identified for consolidating vehicle batteries and printer cartridges. The inspectors observed two wooden pallets in this bay. One pallet held approximately eight used lead-acid batteries. The batteries were not labeled with the words “universal waste.” The second pallet held a cubic yard box labeled for the accumulation of used printer cartridges.

Pursuant to 15A NCAC 13A .0119(b) [40 C.F.R. § 273.14(a)], a small quantity handler of universal waste (SQHUW) must identify the type of universal waste by labeling or marking each universal waste battery or container in which the batteries are contained clearly with one of the following phrases: “Universal Waste – Battery(ies), or “Waste Battery(ies),” or “Used Battery(ies).”

- Bay A4 (Photo 4) is identified for consolidating solvent rags. The inspectors observed two wooden pallets in this bay. One pallet held two cardboard boxes, and the other pallet was empty. The inspectors observed one 55-gallon cardboard box, which was labeled for accumulating hazardous waste used solvent rags, marked with an indication that the contents are toxic, and dated May 1, 2024, and one 30-gallon cardboard box, which was labeled for accumulating hazardous waste cadmium plating rags / debris, marked with an indication that the contents are toxic and corrosive, and dated May 8, 2024; and
- Bay A5 (Photo 5) is identified for consolidating Part B Paint and Pens and Two-Part Aerosol with isocyanates. The inspectors observed two wooden pallets on the floor and five smaller containers on the first shelf in this bay. The first pallet held two 30-gallon cardboard boxes: one that was labeled for the accumulation of hazardous waste paint, marked with an indication that the contents are flammable and corrosive, and dated May 20, 2024; and one that was labeled for the accumulation of universal waste used aerosol cans and dated May 29, 2024. The second pallet held one 30-gallon cardboard box and one 10-gallon bucket. The box was labeled for the accumulation of non-RCRA regulated waste paint remover, and the bucket was labeled for the accumulation of hazardous waste Alodine, marked with an indication that its contents are toxic and corrosive, and dated May 1, 2024.

The inspectors observed one 5-gallon carboy container and four 5-gallon cardboard boxes on the first shelf in Bay A5. The carboy was labeled for accumulating nonhazardous waste austins A1 bleach. One box was labeled for accumulating hazardous waste zinc chloride and hydrochloric acid; it was marked with an indication that its contents are corrosive; and it was dated May 1, 2024. One box was labeled for accumulating non-RCRA nonregulated etching and desmutting, and dated December 18, 2023. One box was labeled for accumulating universal waste aerosols, and dated

December 28, 2023. The final box was labeled for accumulating hazardous waste nitric acid and chromium trioxide; it was marked with an indication that its contents are toxic and corrosive.

- Bay B1 (Photo 6) is identified for consolidating liquid detergents and cleaning compounds. The inspectors observed two wooden pallets in this bay. The first pallet held two 5-gallon containers: one labeled for accumulating hazardous waste paint related material, marked with an indication that its contents are flammable, and dated May 20, 2024; and the other labeled for accumulating hazardous waste isopropanol, marked with an indication that its contents are flammable, and dated May 23, 2024. The second pallet held one 55-gallon container, which was labeled for accumulating non-RCRA detergent;
- Bay B2 (Photo 7) is dedicated to a unit for managing used fluorescent bulbs. The inspectors observed one 55-gallon container, which is equipped with a bulb crushing device, in this bay. Facility personnel stated that the crushed glass and the used filters generated by this unit have each been sampled and analyzed to determine if either is a hazardous waste. According to personnel, the facility has determined that the crushed glass is not a hazardous waste, but the used filters are. The 55-gallon container was not labeled, and personnel estimate that container is filled about once every three-to-four months;
- Bay C1 (Photo 8) is identified for the accumulation of non-liquid detergents and grease. The inspectors observed two wooden pallets in this bay. Each pallet held one cubic yard box. One box was labeled non-RCRA detergent, and the other was labeled non-RCRA grease;
- Bay C2 was not used for accumulating or storing wastes at the time of the inspection;
- Bay D1 (Photo 9) is identified for the accumulation of latex paint and used aerosols other than isocyanates. The inspectors observed two wooden pallets in this bay. Each pallet held one cubic yard box. One box was labeled non-RCRA latex paint. The other box was labeled universal waste aerosols and dated March 25, 2024; and
- Bay D2 (Photo 10) is identified for the accumulation of sealant and adhesive and of flammable paint. The inspectors observed two wooden pallets in this bay. Each pallet held one cubic yard box. One box was labeled hazardous waste sealant / adhesives, marked with an indication that its contents are corrosive, and dated June 5, 2024. The other box was labeled hazardous waste paint, marked with an indication that its contents are flammable, and dated June 7, 2024.

The Storage Area is separated from the collection area by a chain link fence. Containers of hazardous waste, universal waste, and nonhazardous waste are stored in the Storage Area, where they can be prepared and staged for transportation off-site. The inspectors observed three rows of pallets holding various containers of waste in this area. According to facility personnel, the first row (Photo 11) is used to store containers and prepare them for shipment,

and the remaining two rows (Photo 12) are used to stage containers that are ready for shipment.

The inspectors observed six wooden pallets in the first row of stored containers. The first pallet held one cubic yard box labeled non-RCRA grease. The second pallet held four 55-gallon containers: one container was labeled hazardous waste, marked with an indication that its contents are toxic, and dated May 20, 2024; one container was labeled nonhazardous used oil filters; and two containers were labeled non-RCRA. The third pallet held four 55-gallon containers, and each container was labeled non-RCRA. The fourth pallet held five 30-gallon cardboard boxes: one box was labeled hazardous waste paint, marked with an indication that its contents are corrosive and flammable, and dated April 26, 2024; one box was labeled non-RCRA paint remover; and three boxes were labeled universal waste used aerosols. The fifth and sixth pallets held a total of approximately fourteen 5-gallon containers, one 20-gallon non-RCRA container, two 10-gallon metal containers, and three 10-gallon poly containers. One 5-gallon container was labeled hazardous waste, marked to indicate that its contents are flammable, and dated March 29, 2024.

The inspectors observed a total of twelve wooden pallets in the two remaining rows, which are used to stage containers that are ready for shipment:

- Pallet 1 was empty;
- Pallet 2 held two 5-gallon container and one 10-gallon container of FRC cold spray, which personnel stated was being sampled for metals content; and two 30-gallon boxes of Cathode Ray Tubes (CRTs), which personnel stated were being sampled for radiation;
- Pallet 3 was empty;
- Pallet 4 held two 55-gallon containers, each of which was labeled hazardous waste silver parts washer, marked to indicate that the contents are toxic, and dated June 7, 2024;
- Pallet 5 was empty;
- Pallet 6 held one cubic yard box, which was labeled hazardous waste paint, marked to indicate that the contents are flammable, and dated April 24, 2024;
- Pallet 7 held four 55-gallon containers, and each was labeled hazardous waste silver parts washer liquid, marked to indicate that the contents are toxic, and dated June 7, 2024;
- Pallet 8 held two 5-gallon boxes and two 20-gallon containers. Each of the 5-gallon boxes was labeled hazardous waste alodine rags, and marked to indicate that the contents are toxic. One box was dated June 5, 2024, and the other was dated June 10, 2024. Each of the 20-gallon containers was labeled hazardous waste alodine rinse water, marked to indicate that the contents are toxic, and dated June 5, 2024; and

- Pallet 9 (Photo 13) held lead acid batteries, which were shrink-wrapped together on the pallet. The inspectors observed a label, which included the words “universal waste batteries” and the date June 5, 2024, on the shrink-wrapping.

Pursuant to 15A NCAC 13A .0119(b) [40 C.F.R. § 273.14(a)], a small quantity handler of universal waste (SQHUW) must identify the type of universal waste by labeling or marking each universal waste battery or container in which the batteries are contained clearly with one of the following phrases: “Universal Waste – Battery(ies), or “Waste Battery(ies),” or “Used Battery(ies).”

- Pallet 10 held two cubic yard boxes stacked one above the other. One box was labeled hazardous waste sealants /adhesives, marked to indicate that the contents are corrosive, and dated April 29, 2024. The other box was labeled non-RCRA;
- Pallet 11 held two 55-gallon containers labeled non-RCRA engine gas path cleaner; and
- Pallet 12 held four 30-gallon boxes. One box was labeled universal waste aerosols and dated May 20, 2024. Two boxes were labeled hazardous waste weapons cleaning debris, marked with an indication that the contents are toxic, and dated May 30, 2024, or June 5, 2024. The last box was labeled hazardous waste paint booth filter (barium, cadmium, chromium), marked to indicate that the contents are toxic, and dated June 3, 2024.

In addition to the rows of pallets holding various containers of waste that were observed in this area, the inspectors also observed approximately ten cubic yard boxes of aqueous film-forming foam (AFFF) debris and twenty-four totes of AFFF liquids in this storage area. Personnel explained that the Marine Corps no longer allows the use of AFFF at any Marine Corps installations. As a result, USMC New River has been draining old AFFF from fire engine vehicles and replacing the AFFF with another fire-fighting foam. Personnel accumulate any AFFF wastes that are generated by this process, and those wastes have been brought here for storage until an on-site working group determines how to dispose of the wastes appropriately.

Marine Aviation Logistics Squadron (MALS) 26 / Air Frames Metal Shop SAA:

Although the MALS 26 / AS 518 area is equipped with a large paint booth, the unit was not in service at the time of the inspection. Personnel explained that the booth was installed with a single stage filter system, which must be retrofitted with a three-stage system before it can be placed into service. The inspectors entered the paint booth and observed that it was in use for equipment storage rather than painting activities.

USMC New River operates a cadmium plating process in the MALS 26 / AS 518 area, and generates contaminated rags used in plating and general cleaning activities performed in this area. The installation manages one SAA in the MALS 26 / AS 518 area for managing hazardous waste, and the inspectors observed two containers on a secondary containment pallet in this SAA (Photo 14): one 35-gallon container for accumulating hazardous waste rags generated from solvent cleaning activities, and one 5-gallon container for accumulating hazardous waste rags generated in the cadmium plating process. The 35-gallon container was labeled hazardous waste solvent rags and marked with an indication that the contents are flammable. The 5-gallon

container was labeled hazardous waste cadmium plating rags, and marked with an indication that the contents are toxic and corrosive. The secondary containment pallet also held a flammable can for accumulating rags used to clean grease and lubricants.

When returning through the Air Frames Metal Shop on the way to exiting the MALS 26 area, the inspectors observed two plastic bags left on a mobile cart at the SAA (Photo 15). Facility personnel on the inspection tour initially believed that the bags, which were not labeled with the words hazardous waste or marked with an indication of the hazards of the contents, contained hazardous waste Alodine. When asked, personnel working in the area explained that the bags contained cadmium plating waste and they immediately transferred the bags into the 5-gallon container of hazardous waste cadmium rags upon request from the MCAS New River personnel on the inspection tour.

Pursuant to 15A NCAC 13A .0107(a) [40 C.F.R. § 262.15(a)(5)], which is a condition of the SAA Permit Exemption, a generator is required to mark or label its containers with the words “Hazardous Waste” and with an indication of the hazards of the contents.

MALS 26 / Air Frames Composite Shop SAAs:

USMC New River manages one SAA in the Air Frames Composite Shop for managing hazardous waste solvent rags and sanding debris that is generated by paint removal activities. The inspectors observed two containers in this SAA (Photo 16): one 30-gallon container for hazardous waste solvent rags and one 20-gallon container for hazardous waste sanding debris. The 30-gallon container was labeled hazardous waste and marked with an indication that the contents are flammable. The 20-gallon container was labeled hazardous waste and marked with an indication that the contents are toxic. Personnel explained that sanding activities are performed inside a down-draft booth, and dust and debris generated by this process is swept up and placed into the 20-gallon container in the SAA.

Painting activities are performed in a small paint booth within the Air Frames Composite Shop. Most painting is done using a two-part aerosol paint product. The installation manages one SAA at the paint booth for accumulating hazardous waste paint related material that is generated by these activities (Photo 17). The inspectors observed one 20-gallon container in this SAA. The container was labeled hazardous waste paint and marked with an indication that the contents are flammable. The inspectors also observed a layer of plastic taped to the floor inside the paint booth, and a filter system with sixteen filter cells. Personnel explained that a pressure gauge system is used to track the performance of the paint booth filters, and that the filters are replaced approximately once every three months. When they are replaced, the used paint booth filters, plastic liner, and tape is managed as hazardous waste.

Although the Air Frames Composite Shop does generate hazardous waste Alodine, the process generating this waste is not routinely performed in this area. As a result, the installation does not typically have dedicated SAA for managing hazardous waste Alodine. Personnel stated that, when this waste is generated, it is transferred to the CAA at the end of each day. The inspectors did not observe hazardous waste Alodine in this area at the time of the inspection.

51B Tire and Wheel Shop SAA:

Although USMC New River generates several hazardous wastes, including spent parts washer solvents and used paint stripper, in the 51B Tire and Wheel Shop, the facility manages only one SAA in this area. The inspectors observed one 30-gallon container for accumulating hazardous waste solvent rags in this SAA. The container was labeled as hazardous waste and marked with an indication that the contents are flammable. Other hazardous wastes are generated in the 250-gallon strip tank and in the red and silver parts washer units.

Although most parts are sanded and scrubbed to remove paint in the 51B Tire and Wheel Shop, those parts that will undergo nondestructive testing are placed into a 250-gallon strip tank for paint removal. The strip tank contains liquid paint remover which is heated and agitated to remove paint from the immersed part. When a part is removed from this unit, it is rinsed in an aqueous washer. Facility personnel stated that waste rinsewaters generated in the aqueous washer may be hazardous or nonhazardous waste. Therefore, the rinsewaters are sampled and analyzed for hazardous waste characterization prior to disposal. The contents of the 250-gallon strip tank are also periodically sent off-site as hazardous waste. Personnel estimated that the unit may be cleaned out approximately once each year. First, the liquids are drained from the unit. Next, the solids are removed before new paint remover liquids are added to the unit.

In addition to the wastes generated from the operations associated with paint stripping, the 51B Tire and Wheel Shop also generates spent parts washer solvents in red and silver parts washer units. The parts washer units are serviced by the in-house environmental team, and the spent solvents generated in these units are managed as hazardous waste when the units are serviced. The silver parts washer units are used to clean bearings, and samples of spent solvents generated in these units have consistently failed TCLP analysis. The red parts washer units are used to clean other parts, and some samples of spent solvents generated in these units have also failed TCLP analysis.

Armory SAAs:

The armory for smaller caliber weapons is housed in the Headquarters and Headquarters Squadron Building AS 4145. The installation manages one SAA for managing hazardous waste weapons cleaning debris generated in each designated armory room within the building. The inspectors observed one 55-gallon container in the VMM 774 / MAG 49 armory (Photo 18), one 55-gallon container in the MWSS – 272 armory (Photo 19), and one 55-gallon container in the MAG 26 armory (Photo 20). Each container was labeled hazardous waste weapons cleaning debris and marked with an indication that the contents are toxic.

12) Records Review

Contingency Plan and Quick Reference Guide (QRG):

The actions that facility personnel should take in response to an emergency are described in the facility's Contingency Plan, which was last updated in January 2022.

The plan includes a list of emergency equipment at the facility, and the list identifies the capability, function, and location of each item on the list; it includes an evacuation plan for personnel, and the plan describes the signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes; and it describes arrangements agreed to with the local police department, fire department, Navy On-Scene Coordinator (NOSC), and local hospital. The plan lists the names and emergency telephone numbers for persons identified as emergency coordinators. Personnel stated that the Contingency Plan is currently under revision because the individual who is identified as the primary emergency coordinator has retired. The list of alternate emergency coordinators is still current, and those individuals are listed in the order in which they will assume responsibility.

The list of hazardous waste identified in the quick reference guide includes: lead acid batteries, nickel metal hydride batteries, lithium batteries, nickel cadmium batteries, flammable paint part "a", aerosols (except flammable paint), aerosol paints, sealants/adhesives, flammable paint part "b", flux, Alodine, solvent rags, paint remover, chromate conversion coating 3002, cadmium LHE, waste paint, paint gun cleaner rags/debris, red parts washer fluid, blast media, compressor oil, down draft table filters, iridite, diethylenetriamine, pasa gel, red parts washer filter/debris, Alodine rags/debris, alcohol, sulfuric acid, corrosion removing compound, electroclean, and Ozzy juice filters/debris. The list 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; and the identification of any hazardous wastes where exposure would require unique or special treatment by medical or hospital staff. The quick reference guide also includes a map of the facility showing where hazardous wastes are generated, accumulated, and treated; a street map of the facility; the identification of on-site notification systems; and the name of the emergency coordinator(s) and emergency telephone number(s). Personnel stated that the quick reference guide is also currently under revision because the individual who is identified as the primary emergency coordinator has retired. The list of alternate emergency coordinators is current, and those individuals are listed in the order in which they will assume responsibility.

A copy of the Contingency Plan is available on a Microsoft Teams site on the installation's intranet system, which is accessible by the identified police department, fire department, NOSC, and hospital. The quick reference guide was submitted to the Marine Corps Installation - East (MCIEast) - Marine Corps Base (MCB) Camp Lejeune (CAMLEJ) Provost Marshalls office (police), MCIEast - MCB CAMLEJ Fire and Emergency Services Division (fire), Naval Medical Center Camp Lejeune, and Onslow County Local Emergency Planning Committee.

Training Records:

The inspectors reviewed records of employee hazardous waste training.

Waste Manifest and Land Disposal Restriction (LDR) Records:

The inspectors reviewed available hazardous waste manifest records and land disposal restriction forms for shipments of hazardous waste sent since January 2023. Although the

manual recordkeeping system included only the original signed manifest record and LDR forms for manifest numbers 001258897WAS and 001258896WAS, USMC New River personnel immediately located electronic copies of the signed returned copies of those records.

Weekly Inspection Records:

The inspectors reviewed available records of inspections of the hazardous waste central accumulation area (CAA) since September 29, 2023. The inspection log includes a checklist to record observations to verify that containers met DOT standards, containers are labeled, container are closed, funnels on containers are closed, containers are in good condition, the spill plan is available, the volume of waste in the containers is below the maximum allowable limit, containers are less than 90-days old, spill response equipment is available, and communication equipment is available. No records of weekly inspections were available between November 16 and December 3, 2023, or between May 9 and May 24, 2024.

Pursuant to 15A NCAC 13A .0107(a) [40 C.F.R. § 262.17(a)(1)(v)], which is a condition of the LQG Permit Exemption, a LQG must, at least weekly, inspect CAAs looking for leaking containers and for deterioration of containers caused by corrosion or other factors.

13) Closing Conference

The inspectors conducted the exit meeting at 3:00 PM with Michael S. Rogers, Supervisory Environmental Protection Specialist, Installation & Environment Department; Thomas R. Conklin, Environmental Compliance Inspector; Gregory R. Ottey, Hazardous Waste Manager, Installation & Environment Department. During this meeting, the inspectors stated their preliminary conclusions of the inspection.

14) List of Attachments

Attachment 1 – Photo Log

15) Signed

LAURIE DIGAETANO Digitally signed by LAURIE DIGAETANO
Date: 2024.08.05 09:43:56 -04'00'

Laurie Benton DiGaetano
Environmental Engineer

16) Concurrence

ALAN NEWMAN Digitally signed by ALAN NEWMAN
Date: 2024.08.05 13:27:54 -04'00'

Alan R. Newman
Acting Chief
RCRA Enforcement Section

Attachment 1 – Photo Log

Twenty Photos taken on: June 11, 2024
Photos taken by: Laurie Benton DiGaetano
Photos taken with: Panasonic DMC TS-5
EPA Property Tag: S09533



Photo 1: Bay A1 for consolidating and storing nickel-cadmium dry-solid batteries, lithium-ion batteries, nickel batteries dry, and lead acid batteries in the CAA.



Photo 2: Bay A2 for consolidating and storing used aircraft batteries and nickel-cadmium batteries in the CAA.



Photo 3: Bay A3 for consolidating and storing vehicle batteries and printer cartridges in the CAA.



Photo 4: Bay A4 for consolidating and storing solvent rags in the CAA.



Photo 5: Bay A5 for consolidating and storing part B paint and pens and two-part aerosol with isocyanates in the CAA.



Photo 6: Bay B1 for consolidating and storing liquid detergents and cleaning compounds in the CAA.



Photo 7: Bay B2 for crushing used fluorescent lamps and accumulating and storing the crushed glass generated by this process in the CAA.



Photo 8: Bay C1 for consolidating and storing non-liquid detergents and grease in the CAA.



Photo 9: Bay D1 for consolidating and storing latex paint and used aerosols other than isocyanates in the CAA.



Photo 10: Bay D2 for consolidating and storing sealant and adhesive and flammable paint in the CAA.

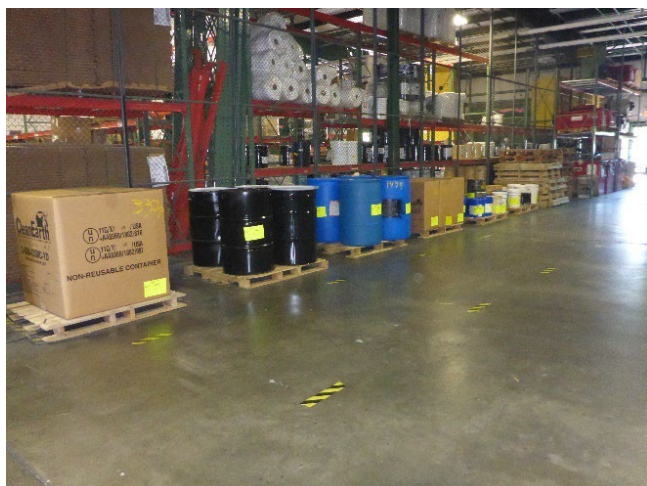


Photo 11: Row of containers preparing for shipment in the CAA.



Photo 12: Two rows of containers ready for shipment in the CAA.



Photo 13: Pallet of lead-acid batteries ready for shipment in the CAA. Batteries shrink-wrapped together. Shrink-wrapped was labeled universal waste batteries, but individual batteries were not labeled.



Photo 14: One 35-gallon container for accumulating hazardous waste rags generated from solvent cleaning activities and one 5-gallon container for accumulating hazardous waste rags generated in the cadmium plating process in the MALS 26 Air Frames Metals Shop SAA.



Photo 15: Two plastic bags containing hazardous waste rags that was left on the cart at the MALS26 Air Frames Metals Shop SAA.



Photo 16: One 30-gallon container for accumulating hazardous waste solvent rags and one 20-gallon container for accumulating hazardous waste sanding debris in the MALS 26 Air Frames Composite Shop SAA.



Photo 17: One 20-gallon container for accumulating hazardous waste paint related material in the Air Frames Composite Shop Paint Booth SAA.



Photo 18: One 55-gallon container for accumulating hazardous waste weapons cleaning debris in the VMM 744 / MAG 49 armory SAA.



Photo 19: One 55-gallon container for accumulating hazardous waste weapons cleaning debris in the MWSS - 272 armory SAA.

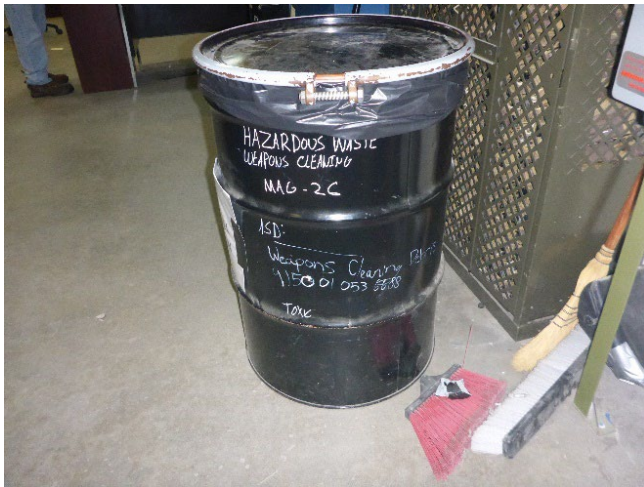


Photo 20: One 55-gallon container for accumulating hazardous waste weapons cleaning debris in the MAG 26 armory SAA.