RCRA Inspection Report

1) Inspector and Author of Report

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

U.S. Army Aviation Center of Excellence and Fort Novosel
2218 6th Ave
Fort Rucker, AL 36362

EPA ID#: AL6210020776
NAICS #: 562112 - HAZARDOUS WASTE COLLECTION
332813 - ELECTROPLATING, PLATING, POLISHING, ANODIZING, AND COLORING
48819 - OTHER SUPPORT ACTIVITIES FOR AIR TRANSPORTATION
811111 - GENERAL AUTOMOTIVE REPAIR
92811 - NATIONAL SECURITY

3) Responsible Officials

Melissa Lowlavar
Environmental
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4) Inspection Participants

Melissa Lowlavar, Fort Novosel
Kevin Matthews, Fort Novosel
Dan Patten, Fort Novosel
Amanda Hickerson, Fort Novosel
Gordon Dahle, Fort Novosel
Roberta Gonzalez, Fort Novosel
Lee Gunter, ADEM
Rahne Hicks, ADEM
Tarin Tischler, USEPA

5) Date of Inspection

10:34 AM June 13, 2023

6) Applicable Regulations[1]

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 Alabama Hazardous Waste Management and Minimization Act of 1978, Ala. Code §

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.

22-30-1 et seq., and rules 335-14-1 to 335-14-17 (2016 and 2018) of the Alabama Department of Environmental Management (ADEM) Administrative Code (ADEM Admin. Code).

Pursuant to ADEM Admin. Code 335-14-1-.02-(1)(a)111 [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 ADEM Admin. Code r. 335-14-11-.02(1)(a)244 [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 ADEM Admin. Code r. 335-14-3-.01(5)(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 Section 22-30-12(b) of the AHWMMA, Ala. Code § 22-30-12(b) [Section 3005 of RCRA, 42 U.S.C. § 6925], and without complying with ADEM Admin. Code r. 335-14-3-.01(6)(b) or 335-14-3-.01(7)(a) [40 C.F.R. § 262.16(b) or § 262.17(a)], except as required in ADEM Admin. Code r. 335-14-3-.01(5)(a)7. and 8. [40 C.F.R. § 262.15(a)(7) and (8)], provided that the generator complies with the satellite accumulation area conditions listed in ADEM Admin. Code r. 335-14-3-.01(5)(a) [40 C.F.R. § 262.15(a)] (hereinafter referred to as the "SAA Permit Exemption").

Pursuant to ADEM Admin. Code r. 335-14-3-.01(7) [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 Section 22-30-12(b) of the AHWMMA, Ala. Code § 22-30-12(b) [Section 3005 of RCRA, 42 U.S.C. § 6925], provided that the generator complies with the conditions listed in ADEM Admin. Code r. 335-14-3-.01(7) [40 C.F.R. § 262.17] (hereinafter referred to as the "LQG Permit Exemption").

7) Purpose of Inspection

The purpose of this inspection was to conduct an unannounced compliance evaluation inspection to determine compliance with the applicable requirements of RCRA and the corresponding Alabama Department of Environmental Management (ADEM) regulations. This was an EPA lead inspection.

8) Facility Description

U.S. Army Aviation Center of Excellence and Fort Novosel (hereinafter Fort Novosel or facility) is a United States Army post in Alabama. Fort Novosel opened in 1942 originally under the name Fort Rucker. The facility was officially renamed on April 10, 2023, and was in the process of registering all entities on base under the revised name at the time of the inspection.

Waste is generated at Fort Novosel in the Aviation Maintenance and Support Shop, the Hub Shop, the Lyster Army Health Clinic, and on the airfields across the base. The facility acts as the main generator consolidating waste from multiple points of generation across the base, while the Cairns Army Airfield and the Shell Army Heliport operate under their own individual EPA

Identification Numbers. Waste generated at the facility includes absorbents contaminated with fuel and paint, paint related waste, waste pharmaceuticals, hazardous waste laboratory regents, and universal waste lamps and aerosols. The facility initially notified as a large quantity generator (LQG) in 1990 under the name Fort Rucker. The facility most recently notified as an LQG on May 9, 2023 under the new name Fort Novosel. Hazardous waste generated at the facility is disposed of by AES Environmental, LLC and hazardous waste pharmaceuticals are disposed of by Stericycle.

9) Previous Inspection History

ADEM has conducted five RCRA CEIs at the subject facility between 2018 and 2022 and found no violations during those inspections.

10) Opening Conference

On June 13, 2023, EPA inspector Tarin Tischler accompanied by ADEM inspector Lee Gunter and Rahne Hicks, arrived at U.S. Army Aviation Center of Excellence and Fort Novosel (hereinafter Fort Novosel or facility) at approximately 10:34 AM. Amanda Hickerson immediately received the inspectors after the inspectors passed the security entrance and showed drivers licenses and government ID cards. Amanda Hickerson and the inspectors met in the Directorate of Public Works Environmental and Natural Resources Division (DPW-ENRD) building for the opening conference. The inspectors introduced themselves, showed their credentials to Amanda Hickerson and explained the purpose of the visit.

The inspectors described the anticipated use of equipment (iPad) during the inspection and provided a request for records. The facility does not meet the classification of a small business. 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 Fort Novosel's ability, pursuant to 40 C.F.R. § 2.203, to assert a business confidentiality claim for information submitted to EPA. Fort Novosel did not assert a business confidentiality claim.

Amanda Hickerson 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 the facility representative led the inspectors on a tour of the Facility operations.

11) Inspection Observations

Aviation Maintenance Support Shop/ Hub Shop

The Aviation Maintenance Support Shop (AMSS) acts as the maintenance and repair shop for airfield equipment on base. Inspectors were greeted in this area by Kevin Matthews, Environmental Compliance Manager. Airfield personnel send parts here for repair, and waste generated in repair operations includes paint waste exhibiting the hazardous characteristic of toxicity and absorbents contaminated with paint and fuel exhibiting the hazardous characteristics of toxicity and ignitability. Facility representatives informed inspectors that the majority of wastes generated in the AMSS are absorbents contaminated with paint, cadmium, chromium and lead (EPA Waste Codes: D001, D006, D007, and D008.)

The Hub Shop is located in the AMSS building and consists of multiple areas for specific maintenance operations. These areas include the Cad Plating Shop, Paint Shop, Welding Shop, Supply Shop, Clean Shop and Engine Shop. Kevin Matthews informed inspectors that the AMSS building employs 150 staff. Waste is managed in satellite accumulation areas (SAAs) throughout the building.

The facility maintained one 55-gallon container in each satellite accumulation area located at various waste generation points in the hub shop. Facility representatives informed inspectors that rags are used throughout the AMSS and Hub Shop and are disposed of at the end of each shift. The SAA for contaminated absorbent rags was located in the area of the Hub Shop with the most foot traffic so it could be easily reached by AMSS staff. These rags do not become a waste until they are brought here at the end of each shift, so the container is located at the point of generation of the contaminated absorbents. SAA containers take 3-4 weeks to fill before being transferred to the Hazardous Materials Control Center (HMCC). When an SAA is full, AMSS personnel call Kevin Matthews. Kevin Matthews or his team of two (Todd Osley and Derneller Petty) will bring an empty drum to the SAA and move the full drum to the CAA on the same day.

Inspectors observed the following areas throughout the building:

- Paint Shop

Inspectors observed the following SAA containers in the Paint Shop:

- One 55-gallon drum labeled “hazardous waste, absorbents with fuel, cadmium, chromium, lead, toxic, ignitable, D001, D006, D007, D008.” (Photo #1)
- One 55-gallon drum labeled “hazardous waste, solid paint waste, toxic, D006, D007, D035.” (Photo #2)

- Blade Shop

Inspectors observed the following SAA containers in the Blade Shop:

- One 55-gallon drum labeled “hazardous waste, liquid paint waste, toxic, ignitable, D001, D006, D007, D035.”
- One 55-gallon drum labeled “hazardous waste, solid paint waste, toxic, D006, D007, D035.”

- Welding Shop

Metal parts are welded in this area during maintenance and repair operations before being brought to the plating shop. No hazardous waste was observed in this area. Facility representatives informed inspectors that only absorbent rags are used here and brought to the paint shop SAA at the end of each shift. Aerosol cans and batteries are also used in this area, but these are brought directly to the HMCC and managed as universal waste.

- Cad Plating Line

The Cad Plating Line generates cadmium electroplating waste. Facility representatives informed inspectors that the plating baths are cleaned out once every six months which generates 55-gallons of plating waste per clean out. Bushings and other helicopter parts vulnerable to

corrosion are plated in this area. Inspectors observed one 55-gallon container of plating waste labeled with the words “hazardous waste, toxic.”

- Clean Shop

Parts are sand blasted with a plastic blast media in the Clean Shop for cleaning. Inspectors observed a 55-gallon drum connected to the bag house labeled “hazardous waste, blast media, toxic” (Photo #3).

- Supply Shop

Inspectors observed the following container in the Supply Shop:

- One approximately 30-gallon container labeled “Hazmat for return to HMCC (used Aerosol Cans.)” Facility representative informed inspectors that this container is collected and brought to HMCC for a waste determination.
- One 55-gallon drum labeled “hazardous waste, absorbents with fuel, cadmium, chromium, Lead, toxic, ignitable, D001, D006, D007, D008.”

Hazardous Materials Control Center (HMCC)/Central Accumulation Area (CAA):

The Hazardous Materials Control Center (HMCC) is responsible for managing hazardous waste generated across the base. Satellite accumulation containers are brought directly to the CAA when full, while other smaller container holding waste such as paint and aerosol cans are brought to the pending analysis portion of the HMCC. Inspectors were greeted in the Hazardous Materials Control Center by Dan Patten, Hazardous Materials Supervisor.

The central accumulation area near the HMCC was located in a large warehouse with shelves storing pallets of waste drums. The warehouse shelves were separated into areas designated for flammable liquid waste, flammable solid waste, universal waste, corrosive/oxidizer waste, nonhazardous waste and an overflow waste for any excess drums that could not be stored within their designated areas. Facility representatives informed inspectors that internal hazardous waste labels are used for internal tracking of waste drums from generation to shipment and disposal. Internal packing slips are attached to the hazardous waste label to indicate the contents consolidated in each drum, where on base it was generated, and a point of contact for questions on the contents of the drum (Photo #4). Inspectors observed the following containers stored in the CAA at the time of the inspection:

- Flammable Liquids (Photo #4):

- Five 5-gallon carboy containers labeled “hazardous waste, waste hydrocarbons, ignitable.”
- One 5-gallon drum labeled “hazardous waste, isopropyl alcohol, ignitable.”
- Two 10-gallon containers labeled “hazardous waste, waste liquid hydrocarbons, ignitable.”
- One 5-gallon container labeled “hazardous waste, carbon removing compound, corrosive.”
- One 55-gallon drum labeled “hazardous waste, paint thinner waste, toxic/ignitable.”
- One 55-gallon drum labeled “hazardous waste, alcohol, ignitable.”
- One 5-gallon drum labeled “hazardous waste, acetone, ignitable.”

- Two 5-gallon drums labeled “hazardous waste, waste liquid hydrocarbons, ignitable.”
- Three 5-gallon containers labeled “hazardous waste, naptha solvent, ignitable.”
- One 5-gallon drum labeled “hazardous waste, silicone/rubber, ignitable.”
- One 55-gallon drum labeled “hazardous waste, paint related material, toxic/ignitable.”
- One 30-gallon drum labeled “hazardous waste, naptha solvent, ignitable.”
- Sixteen 5-gallon containers labeled “hazardous waste, flammable liquid.”
- Two 10-gallon drums labeled “hazardous waste, flammable liquid.”
- Three 55-gallon drums labeled “hazardous waste, flammable liquid.”
- One 30-gallon drum labeled “hazardous waste, flammable liquid.”
- Three 55-gallon drums labeled “hazardous waste, flammable liquid.”

- Flammable Solids:

- 29 55-gallon drums labeled “hazardous waste absorbents with fuel and cadmium and lead, toxic, ignitable.”
- One 5-gallon container labeled “hazardous waste, fuel-soaked absorbents, toxic, ignitable.”

- Universal Waste (Photo #5):

- Two cardboard 4-foot cylinders labeled “universal waste fluorescent lamps.”
- Two 55-gallon drums labeled “universal waste, intact aerosol cans.”
- Thirteen 4-foot boxes labeled “universal waste fluorescent lamps.”
- One 5-gallon container us LED lamps.

Nonhazardous Waste:

- One cubic yard box labeled “Nonhazardous, Paini Filters.”

Overflow Waste:

- Five cubic yard boxes labeled “hazardous waste, filters, paper, and absorbents, toxic.”
- Four 55-gallon drums labeled “hazardous waste, absorbents contaminated with cadmium and arsenic, toxic.”
- Two 55-gallon drums labeled “hazardous waste, solid paint waste, toxic.”
- One 55-gallon drum labeled “hazardous waste, broken fluorescent bulbs.”
- Two 55-gallon containers labeled “hazardous waste, absorbents with cadmium, lead, chromium, toxic.”

All hazardous waste containers observed in the HMCC were marked with an accumulation date less than 90 days from the date of the inspection. The oldest hazardous waste container recorded by inspectors was dated April 7, 2023. The oldest universal waste container was dated April 4, 2023.

Facility representatives informed inspectors that aerosols are collected from across the base and consolidated in a trailer behind the CAA. HMCC personnel remove the plastic pieces from paint related aerosols and puncture these cans after separating. The liquid from the aerosol cans is disposed of as hazardous waste. Inspectors observed two 55-gallon SAA drums connected to a puncture device labeled as “hazardous waste, waste paint from aerosols, ignitable” (Photo # 6). These drums contained less than 10-gallons of waste combined. Dan Patten informed inspectors that empty aerosol cans are disposed of in a nearby 20-yard roll off container holding scrap metal

generated in the Fort Novosel airfields. Five identical trailers stored in this area held product containers.

Pesticide based aerosol cans remain in their containers and are consolidated and disposed of as universal waste. Inspectors observed two 55-gallon drums dated less than a year from the date of the inspection and labeled "universal waste aerosols."

The pending analysis portion of the HMCC was located in a separate room from the CAA. In this area, inspectors observed carts and pallets of smaller chemicals, paint cans, and other product containers (Photos #6 and 7). Smaller containers are brought here by HMCC staff and are lab packed into 55-gallon SAA drums for consolidation of the same types of waste. These drums are dated and moved to the CAA when full.

Facility representatives informed inspectors that containers await analysis in this area for no more than a couple days. Inspectors informed HMCC staff that a waste determination must be conducted at the point of waste generation. Facility personnel stated that this area is the point of generation because not all material brought here will become a waste. HMCC staff conduct a visual inspection and determine if containers here can be reused depending on the condition of the container. Inspectors recommended facility representatives store containers in a confined area while awaiting a waste determination and label this area "Hazardous Waste Pending Analysis."

Inspectors observed three 55-gallon drums and several 5-gallon drums consolidating smaller containers that had been determined to be hazardous waste. These containers were closed and labeled with the words "hazardous waste" and an indication of the hazards of the contents. Facility representatives informed inspectors that these containers are dated and moved to the CAA when full. Dan Patten stated that SAA containers remain in this area for less than a year. Following the inspection, inspectors informed facility representatives that the containers in this area exceed the 55-gallon accumulation limit for SAAs. These containers must be limited to 55-gallons cumulative or dated and managed as a CAA.

Pursuant to ADEM Admin. Code r. 335-14-3-.01(5)(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 Section 22-30-12(b) of the AHWMMA, Ala. Code § 22-30-12(b) [Section 3005 of RCRA, 42 U.S.C. § 6925], and without complying with ADEM Admin. Code r. 335-14-3-.01(6)(b) or 335-14-3-.01(7)(a) [40 C.F.R. § 262.16(b) or § 262.17(a)], except as required in ADEM Admin. Code r. 335-14-3-.01(5)(a)7. and 8. [40 C.F.R. § 262.15(a)(7) and (8)], provided that the generator complies with the satellite accumulation area conditions listed in ADEM Admin. Code r. 335-14-3-.01(5)(a) [40 C.F.R. § 262.15(a)] (hereinafter referred to as the "SAA Permit Exemption").

Lyster Army Health Clinic:

The Lyster Army Health Clinic (Lyster) is the health clinic on Fort Novosel Base for military and family only. This area consists of a health clinic, health clinic laboratory, and outpatient pharmacy.

Health Clinic Lab:

Waste generated in the health clinic laboratory includes stains and expired reagents. Inspectors were greeted in this area by Roberta Gonzalez, Environmental Officer. The lab is separated into areas for urinalysis, hematology, and general laboratory testing. Amanda Hickerson informed inspectors that the hematology machine used only nonhazardous materials and waste from this machine is disposed of in the drain, but other areas using hazardous reagents generating waste in the health clinic laboratory is managed in various SAAs. Inspectors observed the following SAA containers in the health clinic laboratory:

- One 3-gallon container labeled "hazardous waste, alkaline, corrosive."
- Two 1-liter containers labeled "hazardous waste, stain, flammable" (Photo #8).

Pharmacy:

Inspectors met with Gordon Dahle, Inventory Management Specialist, in the pharmacy. Pharmacy personnel informed inspectors that waste is generated in the pharmacy when a pill is dropped, a pharmaceutical is damaged before reaching the customer, or a pharmaceutical expires. The pharmacy does not accept returns but has a locked drop box in the pharmacy waiting area for customers to drop off damaged or expired pharmaceuticals. This box is serviced by MedSafe and cannot be accessed by pharmacy personnel (Photo #9).

Most of the pharmaceutical waste generated by the facility is nonhazardous. Inspectors observed a binder labeled "NIOSH list of Hazardous Drugs in Healthcare Settings, 2020" which included descriptions of all pharmaceuticals sold in the pharmacy. Hazardous pharmaceuticals were highlighted in yellow. The facility representatives informed inspectors that nonhazardous waste pharmaceuticals are consolidated in a white container and disposed of by Pharma Logistics. Noncreditable hazardous waste pharmaceuticals are stored in a yellow bin labeled "chemo waste" and disposed of by Stericycle. Inspectors requested documentation of the three most recent shipments from Pharma Logistics, Stericycle, and the facility's reverse distributor for potentially creditable hazardous waste pharmaceutical returns to the manufacturer, which pharmacy personnel were unable to identify at the time of the inspection. Inspectors also requested photo documentation of the yellow container labeled "hazardous waste pharmaceuticals." (Photo #10)

Pursuant to ADEM Admin. Code r. 335-14-7-.16(2)(e) [40 CFR 266.502(e)] a healthcare facility must label or clearly mark each container of non-creditable hazardous waste pharmaceuticals with the phrase "Hazardous Waste Pharmaceuticals."

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 and Site-Specific Spill Plan which was last updated in February 2023. Facility representatives informed inspectors that this version was also in the process of being updated to reflect the military base's updated name from Fort Rucker to Fort Novosel. This update was submitted in May 2023 and was waiting official approval at the time of the inspection.

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 names and emergency telephone numbers for persons identified as emergency coordinators. Samuel Lynon is listed as the primary emergency coordinator, and Amanda Hickerson, Brent Waters, and Allison Marshall 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 signals to be used to begin evacuation, evacuation routes, and alternate evacuation routes.

A copy of the contingency plan (and its quick reference guide) was most recently submitted to the Fort Novosel Police and emergency response in February 2023 and would be resubmitted following the approval of the recent revisions.

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 numbers.

Training Records:

The inspectors reviewed facility job descriptions and employee names that were provided for the HMCC staff in the AMSS building and for the environmental compliance staff in the DPW-ENRD office building. Each description included the requisite skill, education, or other qualifications, and duties of facility personnel assigned to that position.

Fort Novosel 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 2023. Training records indicate that Defense Hazardous Waste Training is administered by the United States Army Logistics University.

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 the date of the last ADEM inspection on September 22, 2022. Hazardous waste manifest records show that D001, D005, D007, D007, D018, and D035 hazardous waste paint material, D006, D007, and D008 hazardous waste solids, and D001 hazardous waste hydrocarbons, are routinely shipped to AES Environmental, LLC (EPAID: KYD985073196) and the most recent shipment at the time of the inspection was made on May 16, 2023. Inspectors observed that hazardous waste manifests were accompanied with LDRs, packing slips, and nonhazardous waste manifests documenting shipments of used oil and other nonhazardous materials.

Weekly Inspection Records:

The inspectors reviewed Fort Novosel's available records of inspections of the hazardous waste central accumulation area (CAA) since September 2022 in the HMCC. 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.

13) Closing Conference

The inspectors conducted the exit meeting at in the DPW-ENRD with Melissa Lowlavar. During this meeting, the inspectors stated their preliminary conclusions of the inspection. Fort Novosel agreed to provide documentation of shipments from the pharmacy and photo documentation of the hazardous waste pharmaceutical container following the inspection. No documentation has been submitted at this time.

14) List of Appendices

Appendix 1 – Photo Log:

15) Signed

TARIN TISCHLER Digitally signed by TARIN TISCHLER
Date: 2023.09.12 09:02:00 -04'00'

Tarin Tischler
Life Scientist

16) Concurrence

ARACELI CHAVEZ Digitally signed by ARACELI CHAVEZ
Date: 2023.09.12 11:12:36 -04'00'

Araceli B. Chavez
RCRA Enforcement Section

Appendix 1 – Photo Log

10 Photos taken on: June 13, 2023
Photos taken by: Tarin Tischler
Photos taken with: EPA iPad
EPA Property Tag: SS8852

Appendix 1 – Photo Log

	Photo #1 – SAA container of absorbents with paint and fuel in the Aviation Maintenance Support Shop.
	Photo #1 – SAA container of solid paint waste in the Aviation Maintenance Support Shop.

	Photo #3 – SAA container connected to the bag house in the Clean Shop.
	Photo #4 – Packing slip and hazardous waste label on waste containers in the Fort Novosel 90-day or loess accumulation area.

	Photo #5 – Universal Waste stored in 90-day or less accumulation area.
	Photo #6 – Containers in the pending analysis portion of the CAA.

	Photo #7 – Additional containers in the HMCC awaiting a waste determination.
	Photo #8 – SAA containers in the health clinic lab.

	Photo #9 – MedSafe container for customer household pharmaceutical disposal.
	Photo # 10 – Container for hazardous waste pharmaceuticals. This container was not labeled with the words “hazardous waste pharmaceuticals”