

RCRA Compliance Evaluation Inspection Report

1) Inspector and Author of Report

Raj Aiyar, Environmental Engineer
U.S. Environmental Protection Agency, Region 4
RCRA Enforcement Section
Chemical Safety and Land Enforcement Branch
Enforcement and Compliance Assurance Division
61 Forsyth Street S.W.
Atlanta, Georgia 30303-8960
(404) 562-8993
aiyar.raj@epa.gov

2) Facility Information

Anniston Army Depot (ANAD)
EPA ID Number: AL3210020027
NAICS Code: 92811, 332813, 562211, 336992, 332812

Physical Address: 7 Frankfort Avenue
Anniston, Alabama 36201-4199
Calhoun County

3) Responsible Officials

Mrs. DeAnn M. Howell
Division Chief
Environmental Compliance and Restoration
Anniston Army Depot
Telephone: (256) 235-4551
Email: deann.m.howell.civ@army.mil

Mr. Randall E. Bright
Director, Directorate of Risk Assessment
Anniston Army Depot
Telephone: (256) 235-7746
Email: randall.bright@us.army.mil

4) Inspection Participants

Mr. Greg Jones-ANAD
Mr. Joseph Owens-ADEM
Mr. Adrian Corbitt-ADEM
Mr. Lee Gunter-ADEM
Mr. Raj Aiyar-EPA

5) **Date and Time of Inspection**

March 15-16, 2022, 9:00 a.m.

6) **Applicable Regulations**

Resource Conservation and Recovery Act (RCRA) Sections 3002, 3004, 3005, 3007 and 3008, (42 U.S.C. §§ 6922, 6924, 6925, 6927 and 6928)

40 Code of Federal Regulations (C.F.R.) Parts 260-266, 270, 273, 279

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

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.

7) **Purpose of Inspection**

On March 15-16, 2022, inspectors from the U.S. Environmental Protection Agency, Raj Aiyar, and the Alabama Department of Environmental Management (ADEM), Adrian Corbitt and Lee Gunter conducted an announced compliance evaluation inspection (CEI) at Anniston Army Depot (hereinafter, "ANAD" or the "facility") to determine its compliance status with the RCRA and the State of Alabama regulations.

8) **Facility Description**

ANAD is located on approximately more than 14,000 acres of woodland in Calhoun County, West of the City of Anniston, Alabama. The facility was built in the 1940's and today employs roughly 6,000 people (4,000 private and 2,000 government employees). The facility operates two shifts, seven days a week. Some of the other key tenant organizations on the depot include Defense Logistics Agency (DLA), Anniston Munition Center (ANMC) and Museum Support Center Anniston.

ANAD serves as a center for industrial and technical excellence (CITE) for tracked and wheeled ground combat vehicles, towed and self-propelled artillery, assault bridging systems, individual and crew served small caliber weapons and locomotives, rail equipment and non-tactical generators. ANAD performs depot level maintenance including repair, refurbishing, and rebuilding on combat and battle damage vehicles. Some of the other activities under the various partnership agreements include wide range of vehicle conversions, upgrades, and new vehicle manufacturing.

ANAD is registered as a Large Quantity Generator (LQG) of hazardous waste with ADEM. The waste codes for the hazardous waste generated at ANAD includes D001, D002, D006, D007, D008, D010 and others. The facility is also a used oil generator and a large quantity handler of universal waste. ANAD has a hazardous waste permit (AL3 210 020 027) for storage of

hazardous waste at their hazardous waste storage facility and treatment of hazardous waste. The storage area includes 3 ANMC (I-103, F704A, F-405), 3 ANAD Industrial Waste Storage Building (BLDG 466, BLDG 512 and BLDG 527), 34-SDC Conventional Waste Munition Storage Igloos and one Roll-off Storage Building. The treatment areas include the Open Burn Unit, Open Detonation Unit and Static Detonation Chamber (SDC) Unit. The permit has been effective since September 21, 2021, and expires on September 21, 2031.

The site is enclosed by at least six-foot high chain-link fence and kept in good repair. The security onsite is maintained by a security force 24-hours a day, seven days a week.

9) Previous Inspection History

ANAD was inspected by ADEM on May 26-27, 2021. No deficiencies were observed during the inspection. ANAD was last inspected by the EPA on January 10, 2017. Two deficiencies were observed during the inspection for container management and for failure to make waste determination. The facility returned to compliance on January 10, 2017, and January 17, 2017, respectively.

10) Findings

Inspectors arrived at the entrance of the facility at approximately 8:30 a.m. and were greeted by Mr. Greg Jones and by Mr. Joseph Owens of ANAD's Environmental Office. The ADEM and EPA inspectors later checked-in for entry and proceeded to Building #199, The Environmental Management Office at the facility. The inspectors were led to a conference room where they met ANAD representatives. The inspectors conducted a formal introduction showing their credentials, stated the purpose of the visit and discussed the scope of the inspection including recordkeeping. Mrs. Howell discussed the safety and security protocols and procedures and a general description of the on-site activities at the facility. Since the operation and processes at the facility involved national security, no photographs were taken during the inspection. The inspectors were later joined by Mr. Jones and Mr. Owens during the walk-through inspection of the facility.

The following areas were visited during the site visit:

- Building # 199, Environmental Office
- Building # 466, Hazardous Waste Storage Unit
- Building # 510, 512, 527, Hazardous Waste Storage Units
- Roll-off Container Area, Hazardous Waste Storage Unit
- Building # 282 Defense Logistics
- Building # #695, Static Detonation Chamber (SDC)
- Building # 431, Abrasive Blast Media Roll-offs
- Building #162 Wastewater Treatment Plant
- Building # 433, Vehicle Clean and Paint
- Building # 400, Non-Gun Disassembly

Building # 692, OB/OD <90 Ash Storage

Building # 282, Defense Logistics Agency (formerly DRMO)

The Defense Logistics Agency (DLA) is the Army's clearing house for all Army owned material coming in or leaving the Depot. The DLA is responsible for oversight of the hazardous waste sent off-site for disposal and maintaining the hazardous waste manifests on-site. The inspectors met Mrs. Debbie Carr responsible for maintaining hazardous waste manifests. We reviewed the hazardous waste manifests for all hazardous waste sent off-site since last ADEM inspection conducted in May 2021. The inspectors recommended Ms. Carr to include a copy of certificate of disposal (CD) along with the manifest indicating that the waste has been properly disposed of as part of recordkeeping. Most of the manifests had CDs, however, there were several manifests without the CDs. The inspectors also recommended segregating hazardous waste manifests from nonhazardous waste invoice and/or bill of lading as part of recordkeeping. No deficiencies were observed during the manifest review.

Building # 695, The Static Detonation Chamber

The Static Detonation Chamber (SDC) unit is a permitted hazardous waste treatment unit used to process munitions and various incendiary devices. The SDC unit is managed by a defense contractor, Amentum. We met Mr. Brian Brasher, Plant Manager for the SDC unit. He gave a brief overview of the safety protocols and explained the process of the SDC unit. The less than 90-day hazardous waste storage area located inside the SDC unit was inspected. The inspectors observed nine hazardous waste drums in the storage area. All the drums were observed to be closed and labeled with "Hazardous Waste" labels. The oldest accumulation date was observed to be January 31, 2022. All the drums had waste codes on them however, none of the drums were observed to contain any indication of the hazard of the contents. The failure to have indication of hazards on all the drums was brought to the attention of Mr. Brasher. The drums were later marked with the appropriate hazard indication during the inspection.

Pursuant to ADEM Admin. Code r. 335-14-3-.01 (7) [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 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").

Pursuant to ADEM Admin. Code r. 335-14-3-.01(2) [40 C.F.R. § 262.17(a)(5)(i)], which is a condition of the LQG Permit Exemption, a generator must mark or label its containers with the following: the words "Hazardous Waste"; an indication of the hazards of the contents; and the date upon which each period of accumulation begins clearly visible for inspection on each container.

The inspectors also observed several Satellite Accumulation Areas (SAAs) in the SDC unit. All the drums were observed to be closed and labeled as "Hazardous Waste". The waste codes on the SAA drums were observed to be D006, D007 and D008. However, none of the

drums had hazard indication labels on the drums. The drums were later marked with the appropriate hazard indication during the inspection.

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 the 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) [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) [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(6)(b)6.(i) [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.

Building # 527, Hazardous Waste Storage Facility

The inspectors observed a sign including a warning sign at the entrance indicating the storage area. The building was sloped with concrete berms around the perimeter of the storage area. The floor was free of any cracks or gaps. The inspectors observed a total of 85 55-gallon drums closed and labeled as “Hazardous Waste” with hazard indication. The contents of the drums included spent lead-acid batteries, paint filters, paint mats, paint related material from a paint booth, shop rags with oil and grease, metal grinding, sludge debris cleanup and other spent hazardous waste. The oldest accumulation start date was observed to be August 19, 2021. None of the containers were observed to be stacked over two containers high. The inspectors observed adequate aisle space at the storage facility. There were no leaks and spills observed in the storage area. The storage facility was equipped with a fire extinguisher and a spill kit. No deficiencies were observed in this area.

Building # 512, Hazardous Waste Storage Facility

The inspectors observed a sign at the entrance indicating the storage area. Building #512 is divided into two sections. One section is used for storage of flammable (D001) waste/waste paint and the other section is used for storage of corrosive (D002) waste. These sections are separated by a wall. In the flammable section, the inspectors observed 11 55-gallon containers of spent waste, 15 55-gallon containers of spent solvent waste, 1 30-gallon container of oxidizing solids, and 2 30-gallon containers of waste flammable lab packs. The corrosive area had containers of spent sulfuric acid, spent aqua strip, waste zinc phosphate coating material, and waste chromatic acid. All the containers were observed to be closed, labeled, and dated. The inspectors observed adequate aisle space at the storage facility. The building was sloped with concrete berms around the perimeter of the storage area. The floor was free of any cracks or gaps. There were no leaks and spills observed in the storage area. The storage facility was equipped with a fire extinguisher and a spill kit.

Outside the storage building, the inspectors observed a roll-off container for containing spent paint filters. The roll-off container was labeled, closed, and dated. No deficiencies were observed in this area.

Roll-off Container Area, Hazardous Waste Storage Facility

The Roll-off Container Area consists of a large concrete pad where roll-off containers, both empty and filled, are stored prior to use or shipment for disposal. The inspectors observed a total of 18 roll-off containers labeled as “Hazardous Waste” covered with tarps. The contents in the hazardous waste roll-off containers was waste blast media from depainting operations, other wastes included paint chips, paint mats, paint related material from the paint booths, waste filter sludge cakes. The oldest accumulation start date on the roll-off containers was observed to be December 16, 2021. Approximately 11 roll-off containers were observed to be empty. Five roll-offs contained nonhazardous waste. No deficiencies were observed in this area.

Building # 510, Hazardous Waste Storage Facility

Building # 510 contained one 20 cubic yard roll-off container containing steam cleaning sludge. There were no cracks or gaps in the containment floor. The building was built to accommodate roll-offs that contain any free liquids. No deficiencies were observed in this area.

Building # 431, Abrasive Blast Media Roll-off

There were two roll-off containers of Blast Media from Spinner Hanger Building # 431. The roll-offs are connected to cyclone system with lids. The inspection was impaired by inclement weather.

Building #466, Hazardous Waste Storage Facility.

The inspectors observed a sign including a warning sign at the entrance indicating the storage area. The building was sloped with concrete berms around the perimeter of the storage area. The floor was free of any cracks or gaps. There was an inventory of 187 containers stored in Building #466. The inspectors observed approximately 78 55-gallon drums in storage. The oldest accumulation start date was observed to be April 28, 2021.

The contents of the drums included waste oxidizing solids, hazardous waste liquids, hazardous waste solids, paint filters, paint mats, paint related material from paint booth, shop rags with oil and grease, metal grinding, waste cutting fluids, lab packs with combustible liquids and spent parts cleaning solvents. There were several hazardous waste containers that were observed to be close to their one-year accumulation start date prior to disposal.

The inspectors observed four containers containing universal waste (spent lithium batteries and mercury containing articles). The oldest accumulation start date on the universal waste containers was observed to be August 19, 2021. There were six 25-yard roll-off containers labeled and closed with tarp. The oldest accumulation start date was observed to be December 16, 2021. There were approximately 99 containers containing nonhazardous waste. None of the containers in the storage were observed to be stacked over two containers high. The inspectors observed adequate aisle space at the storage facility. There were no leaks and spills observed in the storage area. All the containers in storage were observed to

be labeled, closed with hazard indication. The storage facility was equipped with a fire extinguisher and a spill kit.

Adjacent to the storage building, the inspectors observed an aerosol can puncturing device attached to a carbon filter. The device was not in operation at the time of inspection. The inspectors observed one satellite accumulation area (SAA) container located near the device. The SAA container was observed to be closed, labeled with a hazard indication and an D001 waste code. The punctured cans were recycled as scrap metal. No deficiencies were observed in this area.

Weekly Inspection Logs of Hazardous Waste Storage Buildings

The inspectors reviewed the weekly inspection reports for all hazardous waste areas since January 2021-Present. The records were observed to be complete.

Building # 162 Wastewater Treatment Plant

Hazardous and nonhazardous waste sludges are generated in this facility. The sludges are generated from separate filter presses into 20 cubic yard roll-off containers. At the time of inspection, the filter press was out of service and roll off containers were observed to be empty. No deficiencies were observed in this area.

Building # 400, Garrison and General Dynamics Vehicle Disassembly/ Welding

The inspection for Building #400 was conducted by ADEM on March 16, 2022. The disassembly, repair and servicing of combat vehicles is conducted in this building. All the SAA containers were observed to be closed, labeled with hazard indication. The label on one 10,000-gallon use oil tank was observed to be faded and not clearly visible from the west side. Mr. Corbitt recommended putting new used oil labels on the tank such that it was clear and visible for a distance. No deficiencies were observed in this area.

Building # 433, Vehicle Clean and Paint

The inspection for Building #400 was conducted by ADEM on March 16, 2022. The building houses three paint booths. Two 55-gallon SAA containers in this building were observed to be closed and labeled with hazard indication. No deficiencies were observed in this area.

Open Burn (OB) / Open Detonation (OD) Area

The inspection for this area was conducted by ADEM on March 16, 2022. The area was not in use at the time of inspection. The burn and detonation areas were not in operation during the inspection. The Open Burn Unit Daily Inspection Log and the Detonation Area Inspection Log were reviewed. There were no deficiencies observed during the records review.

Building # 692, OB/OD < 90-day Ash Storage

The inspection for this area was conducted by ADEM on March 16, 2022. The small shed located by the burn pans is primarily used for storage of recyclable lead tags from the munitions. This area can also be used for the SAA of ash and debris from the burn pans. The inspectors observed one 55-gallon drum containing recycled lead. No deficiencies were observed in this area.

11) **Record Review**

Other records besides manifests and weekly inspection logs included review of integrated contingency plan dated January 2022 and personnel training records which included job description of employees and description of hazardous waste training were reviewed by ADEM

There were no deficiencies observed during the records review.

12) **Out-Briefing**

An exit briefing was conducted at the conclusion of the inspection. Mr. Randall E. Bright, Risk Assessment Director, Greg Jones and Mr. Joseph Owens, Mrs. DeAnn Howell and participated in the exit briefing. The observations made during the inspection were discussed and the inspection was concluded.

13) **Signed**

RAJAGOPAL AIYAR Digitally signed by RAJAGOPAL AIYAR
Date: 2022.05.12 17:05:50 -04'00'

Raj Aiyar
Environmental Engineer

Date

14) **Concurrence**

ARACELI CHAVEZ Digitally signed by ARACELI CHAVEZ
Date: 2022.05.12 18:05:39 -04'00'

Araceli B. Chavez
Chief
RCRA Enforcement Section

Date