# RCRA Inspection Report

## 1) Inspector and Author of Report

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## 2) Facility Information

Marine Corps Base Camp Lejeune
1 Post Lane
Camp Lejeune, North Carolina 28542-0004

Mailing Address:
PSC Box 20004
Camp Lejeune, North Carolina 28542-0004

EPA ID# NC6170022580

## 3) Responsible Officials

(b) (6) Head, Resource Conservation & Recovery Section
(b) (6)

## 4) Inspection Participants

(b) (6) USMC Camp Lejeune
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Wes Hare, NCDEQ
Laurie Benton DiGaetano, US EPA

## 5) Date of Inspection

June 15, 2021

## 6) Applicable Regulations

Resource Conservation and Recovery Act (RCRA) Sections 3002 (42 U.S. Code – Annotated U.S.C.A. 6925 and 6927), Title 15A of the North Carolina Administrative Code (NCAC), Chapter 13; and 40 Code of Federal Regulation (C.F.R.), Parts 260 - 270, 273, 278, & 279.

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 .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 130A-294(c) and (g) of the NCSWML, N.C.G.S. § 130A-294(c) and (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 130A-294(c) and (g) of the NCSWML, N.C.G.S. § 130A-294(c) and (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(a)] (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 Corps Base Camp Lejeune's compliance with the applicable requirements of RCRA and the corresponding NCDEQ regulations. This was an EPA lead inspection.

## 8) Previous Inspection History

NCDEQ conducts a RCRA CEI at the subject facility every year. No violations have been noted since 06/02/2009.

## 9) Facility Description

Marine Corps Base Camp Lejeune (Camp Lejeune) is a training base that promotes combat readiness of the operating forces and missions of other tenant commands by providing training venues, facilities, services, and support in order to be responsive to the needs of Marines, sailors, and their families. The installation was created in 1941 and utilizes 156,000 acres, 11 miles of beach capable of supporting amphibious operations, 34 gun positions, 50 tactical landing zones, three state-of-the-art training facilities for Military Operations in Urban Terrain an 80 live fire ranges to include the Greater Sandy Run Training Area. Support facilities on the base include banks and credit unions, grocery and retail shops, the library, hoppy shops, fitness centers, theaters, medical center, and pharmacies. The facility operates under the NAICS 928110 for National Security and all property is owned by the Department of Defense.

Camp Lejeune's Resource Conservation and Recovery Section (RCRS) has twelve employees who are trained for managing RCRA hazardous wastes. RCRS provides a daily curbside service for picking up unwanted and waste materials generated throughout the installation. Generating entities submit a ticket to request a pickup of these materials, and RCRS personnel transport the material back to the main hazardous waste central accumulation area (CAA) in building S-962. This procedure was developed in 2010 to diminish problems with unauthorized disposal and curbside drop-off of unknown materials. All units have access to the curbside pickup ticketing system to manage waste or unwanted material.

In addition to the daily curbside pick-up service, RCRS also provides additional management services for hazardous and non-hazardous waste, universal waste, and recyclable materials. RCRS maintains waste profile records for wastes that are routinely generated at the installation and performs hazardous waste determinations on new waste streams including unusable raw materials. RCRS evaluates unwanted material to determine if it can be used by another unit somewhere else on the installation and works to identify a potential use for the material before it reaches its expiration date or exceeds its shelf life. When RCRS determines that a material cannot be reused, they perform a hazardous waste determination on the material. RCRS also runs a program to collect materials such as used oil, antifreeze, and off-spec fuel from areas across the installation and bring those materials for management and storage near building S-962 until it is sent offsite for energy recovery or recycling.

Camp Lejeune's RCRS has identified between 44 and 68 areas where known hazardous wastes are generated. Hazardous wastes generated in each of these areas are accumulated and managed in a hazardous waste satellite accumulation area (SAA) until the unit submits a ticket for daily curbside service. RCRS personnel then come to pick up the hazardous waste and transfer it to the CAA. The number of active SAAs on the installation continually changes as units open and close operations. RCRS staff provide site-specific hazardous waste training to employees managing hazardous wastes where they are generated on-site.

Of the SAAs that were identified at the installation at the time of the inspection, the greatest volumes of hazardous waste appeared to be generated in the armories, the shoot houses, the vehicle refurbishing area and the hospital. According to the facility's contingency plan, the six hazardous waste streams with the largest volumes generated at the installation are: paint still bottoms, used air purification filters, waste aerosols, armory debris, waste alcohol/xylene, and waste paint related material.

Contractors for Camp Lejeune refurbish vehicles and large equipment in building FC286. Refurbishing activities may include media blasting, paint stripping and painting of equipment. Analytical results for used blast media indicate that this material is a nonhazardous waste. Spent solvents generated by paint stripping and cleaning paint pots and spray guns are managed as hazardous waste. Contractors recover spent solvents generated in this area using a small solvent distillation unit. Recovered solvents are used for additional cleaning activities in this area, and solvent still bottoms are managed as hazardous waste.

Camp Lejeune has approximately six designated "shoot houses" which are used for training purposes. At the time of the inspection, RCRS personnel stated that two of the shoot houses were operational, and two were currently off-line. Active shoot houses are cleaned by contractor personnel approximately once per quarter, or more often if necessary. Wastes that are generated during cleaning activities, which include sweeping and mopping the shoot house and changing the air handling filters, are managed as hazardous waste.

After use, weapons are brought to the armory where they are cleaned and stored for reuse. Because materials such as rags, cotton swabs and PPE become contaminated when they are used to clean weapons, Camp Lejeune personnel accumulate these used materials as hazardous waste

armory debris. Designated SAAs at the armories are managed with an assigned unit responsible for each SAA. In some cases, the armories may use daily use cans in the SAA, which are emptied into a 35-gallon drum in the same SAA at the end of the day. RCRS personnel estimated that the instillation was managing hazardous waste at approximately 37 armories at the time of the inspection.

Camp Lejeune's medical center and pharmacies routinely generate hazardous waste pharmaceuticals, which are managed under the RCRA hazardous waste pharmaceutical standards found in 40 C.F.R. Part 266 Subpart P.

Camp Lejeune has been operating as a large quantity generator (LQG) of hazardous waste for well over thirty years. The facility most recently notified as an LQG of hazardous waste and a Large Quantity Handler of Universal Waste (LQHUW) on April 30, 2020. Hazardous wastes identified in the report include:

D001 / D018/ D019 / D021 / D023 / D035 / D040 adhesives and sealants
D001 / D003 / D005 / D018 / D035 / D039 / D040 / U080 aerosols
D001 / F002 alcohol / xylene
D001 alcohol
D009 / D011 amalgam
D001 / D003 ammonium nitrate
D006 / D008 armory debris
D001 calcium carbide
D001 calcium hypochlorite
D002 caustic cleaner
D002 acidic cleaner
D008 debris contaminated with lead
D001 / D009 detector kits
D001 engine starting fluid cylinders
D008 air purification filters
D001 flammable pharmaceuticals
D001 / D003 hydrogen peroxide
D039 / D040 / D043 IDW groundwater w/tetrachloroethylene, trichloroethylene, vinyl chloride
D040 / D043 IDW groundwater w/trichloroethylene
D040 / D043 IDW groundwater w/trichloroethylene, vinyl chloride
D001 insect repellent
D039 / D040 IR groundwater w/tetrachloroethylene and trichloroethylene
D039 / D040 / D043 IR sampling debris w/tetrachloroethylene, trichloroethylene, vinyl chloride
D040 / D043 IR sampling debris w/trichloroethylene, vinyl chloride
D043 IR sampling debris w/vinyl chloride
D028 IR soil w/1,2-dichloroethane
D039 IR water with tetrachloroethene
D006 laboratory reagents
D001 / U154 methanol

D006 nitrate reagents
D001 / D005 / D007 / D035 paint still bottoms
D001 / D005 / D007 / D035 / F005 paint still bottoms
D001 / D005 / D007 / F005 paint still bottoms
D001 / F005 paint still bottoms
D001 / D035 / U002 / U154 / U159 / U220 / U239 paint, paint related materials
U188 phenol solution
P001 / P075 P-listed pharmaceuticals
P001 P-listed pharmaceuticals
D001 potassium chlorate
D001 / D011 silver nitrate applicators
D011 silver nitrate solution byproduct
D001 sodium chlorate
D002 sulfuric acid
D009 / D011 / D024 / U010 / U122 / U150 / U205 toxic pharmaceuticals
D002 trichloroacetic acid
D004 / D018 / D019 / D028 / D039 / D040 / D043 UXO site contaminated soil
D003 water purification tablets
D001 / D002 / D003 / D004 / D009 / P098 / U041 / U279 water testing kit
D007 whetlerite filters
D001 / F003 xylene

## 10) Opening Conference

On June 15, 2021, the EPA inspector Laurie Benton DiGaetano, accompanied by NCDEQ inspector Wes Hare, met with (b) (6), Head, Resource Conservation & Recovery Section, who assisted the inspectors with gaining access to the Marine Corps Base Camp Lejeune facility at approximately 9:15 a.m. (b) (6) and the inspectors were joined by (b) (6) for the opening conference. The inspectors introduced themselves, showed their credentials, 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 the EPA. The company did not assert a business confidentiality claim. The inspection participants also discussed health and safety protocols and required personal protective equipment before the facility representatives led the inspectors on a tour of the Facility operations.

The facility representatives provided an overview of the facility's history and current operations during the opening conference. The installation 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/sites/production/files/2017-06/documents/smallbusinessinfo.pdf.

## 11) Findings

Armory SAAs: The facility tour began by visiting a selected number of armory locations.

- The H-20 Headquarters and Support Battalion armory was managing one SAA. The inspectors observed one 35-gallon container in this SAA, and personnel stated that they do not use daily use cans in this area. The 35-gallon container was closed, labeled hazardous waste armory debris, and marked to indicate the contents are toxic due to elevated levels of lead.
- The 22nd Marine Expeditionary Unit armory was managing one SAA. The inspectors observed one 35-gallon container in this SAA, and personnel stated that they do not use daily use cans in this area. The 35-gallon container was closed, labeled hazardous waste armory debris, and marked to indicate the contents are toxic due to elevated levels of lead.
- The 8th Marines armory was managing one SAA. The inspectors observed one 35-gallon container in this SAA, and personnel stated that they do not use daily use cans in this area. The 35-gallon container was closed, labeled hazardous waste armory debris, and marked to indicate the contents are toxic due to elevated levels of lead.
- The 1st Battalion, 6th Marine Division armory was managing one SAA. The inspectors observed one 10-gallon daily use can and one 35-gallon container in this SAA. Each of these two containers was closed, labeled hazardous waste armory debris, and marked to indicate the contents are toxic due to elevated levels of lead.

Building FC 286 SAAs: The Marine Logistics Group, Logistics Command was managing two SAAs at the time of the inspection. The first SAA, which was located inside one of two paint booths, is used to accumulate used solvents generated in paint stripping, paint pot cleaning, and paint gun cleaning activities. The inspectors observed one 55-gallon drum in this SAA. The drum was staged on a portable secondary containment unit and it was equipped with a latched funnel lid with a closed ball valve. The drum was labeled hazardous waste solvent pending recycling and it was marked to indicate that the contents were flammable and toxic (MEK / methyl isobutyl keytone).

Personnel in this area explained that when this drum is full, it is taken to an area just outside of the paint booth were the solvents are recovered using a small distillation unit, or "minimizer." The Marine Logistics Group, Logistics Command manages a second SAA next to the distillation unit. The SAA is used to accumulate solvent still bottoms generated in by the distillation unit. The inspectors observed one 55-gallon drum in this SAA. The drum was closed, labeled as hazardous waste paint still bottoms, and marked to indicate that the contents are flammable and toxic. Personnel estimated that it takes approximately 45 to 60 days to fill this SAA container.

Facility personnel in this area also explained that the paint booths, which are located in bays 12 and 13, are equipped with approximately 96 air exhaust filters. The air exhaust filters on the walls are changed out when pressure readings indicate a filter change is necessary, and the air exhaust filters on the roofs are changed out about once every 30 days. Used filters are managed as nonhazardous waste.

Blasting operations occur in booth 11, which is designed with an elevated grated floor above a containment system. Blast media can pass through grates on the floor into the containment system, which is equipped with an auger that transfers large blast media particles back into the blasting system for reuse. Smaller blast media particles are collected through an air handling system that transfers the used media into a 55-gallon drum. Personnel routinely empty the contents of this 55-gallon drum into a roll-off container located along the outside of the building. Waste blast media that is collected in the air handling system is managed as nonhazardous waste.

Maintenance activities for battalion engines and transmissions are done inside building FC 286. The inspectors observed several drip pans for accumulating used oil that is generated during maintenance activities. Each drip pan was labeled with the words "used oil." The inspectors also observed a 1,000-gallon double wall tank just outside of the building. Used oil generated within the building is pumped into the tank for storage until RCRS personnel pump out the tank for transfer to the used oil tanks next to the CAA. The used oil tank in this area was labeled with the words "used oil."

Building S-962 Central Accumulation Area: Camp Lejeune manages a hazardous waste CAA in Building S-962. The CAA is divided into 17 individual storage lockers/sheds, which are referred to as bays. Each shed is designed to contain a fire, explosion, or spill that may occur within the unit. The area was identified with a sign which read "danger, hazardous waste storage." When working in this area, employees work in pairs, and each person carries a hand-held two-way radio and wears a whistle to summon emergency assistance. The area is equipped with portable fire extinguishers, fire control equipment, spill control equipment, and decontamination equipment; and it is equipped with automatic sprinklers.

The inspectors observed three bulb crusher units in this area. One of the units was in use, and the other two were staged for use, as necessary. Employees estimate that the installation crushes approximately 20,000 bulbs each year. The crushed bulbs and bulb crusher filters have been sampled and analyzed to determine if they exhibit a characteristic of hazardous waste. Sampling results indicate that the materials are nonhazardous. The inspectors observed one 55-gallon drum associated with the active bulb crusher unit. The drum was labeled as solid waste crushed bulbs and dated 06/14/2021.

Bay 1 is labeled for the storage of corrosives. Acidic waste is stored on one side of the bay and caustic waste is stored on the other side. The inspectors observed one 35-gallon drum labeled hazardous waste acidic cleaner, identified as corrosive, and dated 04/20/2021, and another empty 35-gallon container.

Bay 2 is labeled for the storage of toxics. The inspectors observed three containers of hazardous waste in this bay: one 10-gallon container labeled hazardous waste testing kit and identified as flammable, toxic, reactive and corrosive; one 5-gallon container labeled hazardous waste pharmaceuticals and identified as toxic; and two 5-gallon containers labeled hazardous waste NVG tubes and identified as toxic. Each container was marked with an accumulation start date less than 90-days old. The inspectors also observed one container labeled universal waste mercury containing devices inside this bay.

Bay 3 is labeled for the storage of material that is dangerous when wet. The inspectors observed one 1-gallon bucket of hazardous waste zinc powder in this bay. The container was marked to indicate that the contents are toxic, and it was dated 05/04/2021.

Bay 4 is labeled for the storage of oxidizers. The inspectors observed a flammable cabinet inside this bay, which contained 20-gallon or less containers of hazardous waste generated from training bomb sniffing dogs. One container was labeled ammonium nitrate and identified as flammable and reactive. Another container was labeled hazardous waste sodium chlorate and identified as flammable. The third container was labeled hazardous waste potassium chlorate and identified as flammable. Each container was marked with an accumulation start date that was less than 90-days old.

Bay 5 is labeled for the storage of flammable materials. The inspectors observed two gaylord boxes, five 55-gallon drums, one 20-gallon container, one 10-gallon container, and one 5-gallon container inside this bay. Facility personnel stated that waste inside the boxes is generated in the hospital laboratory. The boxes were labeled as hazardous waste alcohol / xylene (mixed isomers) methanol and marked to indicate that the contents are flammable. The boxes were dated 05/18/2021. One 55-gallon drum was labeled hazardous waste unused methanol and three more were labeled hazardous waste alcohol. Each of these drums was marked to indicate that the contents are flammable and marked with an accumulation start date that was less than 90 days old. Another 55-gallon drum in this bay was labeled adhesives and sealant, marked with in indication that the contents are flammable and toxic, and dated 04/27/2021. The 20-gallon container was labeled hazardous waste engine starting fluid, marked to indicate the contents were flammable gas, and dated 05/05/2021. The 10-gallon container was labeled hazardous waste unused methanol, marked to indicate the contents were flammable, and dated 04/09/2021. The 5-gallon container was labeled hazardous waste pharmaceuticals, marked to indicate the contents were flammable, and dated 04/30/2021.

Bay 6 is labeled for the storage of flammable materials. The inspectors observed a total of four gaylord boxes and seven 55-gallon drums inside this bay. The boxes were stored side by side, two boxes deep. Three drums were stored on one pallet, and four were stored on a second pallet. Each box was labeled hazardous waste (waste paint related materials) aerosols, halogenated solvents, nonhalogenated solvents, paint (50 sludge consisting of binder organic pigment solvent or thinner and fine metal particles). The boxes were marked to indicate that their contents are toxic and flammable and dated 05/25/2021. Four 55-gallon drums were labeled hazardous waste paint related materials (methyl isobutyl ketone, MEK, naptha turpentine, thinners, and petroleum spirits paint pigments) and marked to indicate that the contents are flammable and toxic. Three 55-gallon drums were labeled hazardous waste still bottoms. All of the drums were marked with an accumulation start date that was less than 90-days old.

Bay 7A is labeled for the storage of poisons. The inspectors observed one gaylord box stored inside this bay. The box was closed, labeled hazardous waste armory debris (rags, patches, wipes, tips, towels, rubber mats and filters contaminated with metals), marked to indicate that the contents are toxic, and dated 06/11/2021.

Bay 8 is labeled for the storage of universal hazardous waste. The inspectors observed two gaylord boxes stored one behind the other inside this bay. The boxes were closed and labeled as universal waste aerosol cans.

In an open area between the storage bays, the inspectors observed several rows of waste containers that were staged for shipment. One row of containers consisted primarily of universal waste containers, including six 55-gallon drums of universal waste lithium ion batteries, one 55-gallon container of universal waste lithium batteries, one 55-gallon drum of universal waste nickel metal hydride batteries, and one pallet of universal waste mercury containing lamps.

Four rows consisted primarily of gaylord boxes of hazardous waste ready for shipment, including one box of hazardous waste alcohol, eleven boxes of hazardous waste armory debris, and two boxes of universal waste aerosols. Each of these containers was closed, marked with an accumulation start date less than 90-days old, and marked to indicate the hazards of its contents. At the end of one row, the inspectors observed several gas cylinders which were each labeled as hazardous waste compressed gas, marked with an accumulation start date, and identified as either flammable and reactive or reactive. The inspectors also observed boxes with hazardous waste air purification filters generated at the shoot houses stacked on a wooden pallet and shrink wrapped for shipment. Each pallet was labeled as hazardous waste filters, marked with an accumulation start date, and identified with DOT class 9 and toxic hazard placards.

Bay 13 is labeled for the storage of flammable materials. Personnel explained that this bay is used to store material that did not resell and is now a waste because the material has expired or exceeded its shelf life. The inspectors observed gaylord boxes and eight 55-gallon drums labeled hazardous waste alcohol, identified as flammable and dated 04/12/2021.

Bays 12 and 14 are used to store supplies such as PPE, tents, trash bags, etc.

The tank farm next to Building S-962 includes four 20,000-gallon used oil tanks, two 20,000-gallon used antifreeze tanks, two 20,000-gallon off-spec fuel tanks and one 5,000-gallon used gasoline tank.

Contingency Plan: The actions that facility personnel should take in response to an emergency are described in the facility's Hazardous Waste Contingency Plan and associated quick reference guide (QRG), which were last updated in March 2020. Camp Lejeune provided a copy of the Contingency Plan and QRG to the Camp Lejeune police and fire departments, the Provost Marshall's office, the Camp Lejeune Naval medical center, and the Onslow County Local Emergency Planning Committee (LEPC).

The contingency plan describes actions facility personnel must take in response to fires, explosions, unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water, and floods or hurricanes; it describes arrangements agreed to with the Camp Lejeune police, fire department, and medical center; and it lists the names and emergency telephone numbers for persons identified as the primary emergency coordinator and alternate emergency coordinators. The contingency plan includes a list of emergency equipment at the facility, which includes fire extinguishing systems, spill control

equipment, communications and alarm systems, and decontamination equipment. The contingency plan includes an evacuation plan for personnel, and it describes signal(s) to be used to begin evacuation. Although the plan includes maps of evacuation routes and alternate evacuation routes, those routes were not identified clearly.

The QRG 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 street map of the facility in relation to surrounding businesses, schools and residential areas; maps with the general location where hazardous wastes are generated, accumulated and treated and routes for accessing these wastes; the identification of on-site notification systems; and the name of the emergency coordinator(s) and emergency telephone number(s). Camp Lejeune also maintains a spreadsheet identifying the locations where hazardous wastes are generated, the types of wastes generated, and the unit responsible for generating that waste; and personnel explained that each Unit maintains their own contingency plan that includes the exact location of Unit level SAAs. RCRS personnel stated that the revisions to the contingency plan and QRG are in the final stages of review and approval.

Training Records: The inspectors reviewed facility job descriptions and employee names that were provided for RCRS personnel. Each description included the requisite skill, education, or other qualifications, and duties of facility personnel assigned to that position. The inspectors reviewed records of employee hazardous waste training completed on May 20, 2021.

Waste Manifest Records: The inspectors reviewed available hazardous waste manifest records and land disposal restriction forms for shipments of hazardous waste sent since September 2020.

Inspection Records: The inspectors reviewed Camp Lejeune's available records of inspections of the hazardous waste central accumulation area (CAA) since September 2020. The inspection log includes a checklist to record observations about leaking containers and for deterioration of containers caused by corrosion or other factors. The inspection log includes a checklist to record observations about housekeeping, container labels, condition of containers, compatibility of waste, closed containers, distance from property line for ignitable / reactive wastes, posting of spill plan, danger signs, no smoking signs, emergency communication equipment, emergency response equipment (spill / shower), and spill response equipment. The records include the date and time of the inspection and the name of the employee conducting the inspection. No inspection records were provided between November 16-30, 2020. Mr. Recob explained that no one was available to conduct the weekly inspections during that time frame due to a quarantine following COVID exposure of all RCRS personnel.

## 12) Closing Conference

The inspectors conducted the exit meeting with (b) (6) During this meeting, the inspectors stated their preliminary conclusions of the inspection.

**13) Inspection Findings**

Based on the observations made during the inspection, Camp Lejeune did not appear deficient with the RCRA requirements.

**14) Signed**

LAURIE DIGAETANO Digitally signed by LAURIE DIGAETANO
Date: 2021.07.19 08:58:20 -04'00'

Laurie Benton DiGaetano
Senior Enforcement and Compliance Specialist

**Concurrence**

ARACELI CHAVEZ Digitally signed by ARACELI CHAVEZ
Date: 2021.07.20 13:54:06 -04'00'

Araceli B. Chavez
Chief
RCRA Enforcement Section