

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.
Atlanta, Georgia 30303

2) Facility Information

Keesler AFB
508 L Street
Keesler AFB, Mississippi 39534

EPA ID#: MS2570024164
NAICS #: 9281100 – National Security

3) Responsible Officials

Robert T. Moseley III
Deputy Base Civil Engineer
81st Civil Engineer Squadron
81 CES/DBCE
500 Fisher Street
Building 701, Room 244
Keesler AFB, Mississippi 39534-2701

4) Inspection Participants

Janet Lanier, BOS/CEV
Bob Guerra, BOS/CEV
Dekendrick January, BOS/CEV

William Rider, MDEQ
Laurie Benton DiGaetano, USEPA

5) Date of Inspection

May 14, 2024 at 9:50 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 Mississippi Code of 1972, Miss. Code Ann. § 17-17-1 *et seq.*, and Mississippi Hazardous Waste Management Regulations (MHWMR), 11 Miss. Admin. Code Pt. 3, R. 1.1-1.24.

Pursuant to 11 Miss. Admin. Code Pt. 3, R. 1.1 [40 C.F.R. § 260.10], a large quantity generator of hazardous waste (LQG) is a generator who generates greater than or equal to 1,000 kilograms (2,200 pounds) of non-acute hazardous waste in a calendar month.

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 11 Miss. Admin. Code Pt. 3, R. 1.21 [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 11 Miss. Admin. Code Pt. 3, R. 1.3 [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 17-17-27(4) of the Mississippi Code of 1972, Miss. Code Ann. § 17-17-27(4) [Section 3005 of RCRA, 42 U.S.C. § 6925], provided that the generator complies with the conditions listed in 11 Miss. Admin. Code Pt. 3, R. 1.3 [40 C.F.R. § 262.17] (hereinafter referred to as the “LQG Permit Exemption”).

Pursuant to 11 Miss. Admin. Code Pt. 3, R. 1.3 [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 17-17-27(4) of the Mississippi Code of 1972, Miss. Code Ann. § 17-17-27(4) [Section 3005 of RCRA, 42 U.S.C. § 6925], and without complying with 11 Miss. Admin. Code Pt. 3, R. 1.3 [40 C.F.R. § 262.16(b) or § 262.17(a)], except as required in 11 Miss. Admin. Code Pt. 3, R. 1.3 [40 C.F.R. § 262.15(a)(7) and (8)], provided that the generator complies with the satellite accumulation area conditions listed in 11 Miss. Admin. Code Pt. 3, R. 1.3 [40 C.F.R. § 262.15] (hereinafter referred to as the “SAA Permit Exemption”).

Pursuant to 11 Miss. Admin. Code Pt. 3, R. 1.2 [40 C.F.R. § 261.4(b)(18)], solvent-contaminated wipes, except for wipes that are hazardous waste due to the presence of trichloroethylene, that are sent for disposal are not hazardous wastes from the point of generation, provided that the conditions listed in 11 Miss. Admin. Code Pt. 3, R. 1.2 [40 C.F.R. § 261.4(b)(18)] are met (hereinafter referred to as the “Solvent-Contaminated Disposable Wipe Exclusion”).

Pursuant to 11 Miss. Admin. Code Pt. 3, R. 1.2 [40 C.F.R. § 261.4(a)(26)], solvent-contaminated wipes that are sent for cleaning and reuse are not solid wastes from the point of generation, provided that the conditions listed in 11 Miss. Admin. Code Pt. 3, R. 1.2 [40 C.F.R. § 261.4(a)(26)] are met (hereinafter referred to as the “Solvent-Contaminated Reusable Wipe Exclusion”).

7) Purpose of Inspection

The purpose of this inspection was to conduct an unannounced compliance evaluation inspection to determine Keesler Air Force Base compliance with the applicable requirements of RCRA and the corresponding Mississippi regulations. This was an EPA lead inspection.

8) Facility Description

Keesler Air Force Base (KAFB) is an Air Education and Training Command base that primarily serves as a training center to provide instruction to members of the Air Force, Army, Navy, Marine Corps, Coast Guard, and civilian federal agencies. The Base is home to the 81st Training Wing, which includes the 81st Training Group, the 81st Medical Group, and the 81st Mission Support Group. The 81st Training Group is a Community College of the Air Force institution

which is accredited by the Commission of the Southern Association of Colleges and Schools. The 81st Training Group trains more than 30,000 students each year and offers courses in fields such as personnel, information management, air traffic control, finance, manpower, communications-electronics maintenance, computer operation, maintenance and programming, weather, metrology, aircraft warning and control systems and radio operations. The 81st Medical Group operates one of the largest medical facilities in the Air Force. The primary mission of the 81st Medical Group is to maintain medical readiness for worldwide contingencies. The hospital offers almost 60 services and has 66 training affiliations to train medical physicians, technicians, and nurses. The 81st Mission Support Group provides administrative, personnel, civil engineering, transportation, morale and welfare, recreational, communications, supply, base security, and contracting services for the installation.

The 81st Training Wing also serves as host to the Second Air Force, the 403rd Wing, the 85th Engineering Installation Squadron, and Mathies Noncommissioned Officer (NCO) Academy at KAFB. KAFB is one of four resident training wings for the Second Air Force, which provides technical training, basic military training, medical and distance learning courses. The 403rd Wing, the only Air Force Reserve Command wing in Mississippi, includes the 53rd Weather Reconnaissance Squadron, better known as the “Hurricane Hunters,” and the 815th Airlift Squadron “Flying Jennies,” responsible for delivering tactical airlift to combat forces and providing humanitarian relief in disaster zones. The 85th Engineering Installation Squadron (EIS), the Air Force’s only active-duty EIS, provides worldwide contingency and peacetime engineering and installation of cable, antenna, radio, radar, airfield, and secure cyber systems infrastructure. Mathies NCO Academy provides leadership training to noncommissioned officers through the Intermediate Leadership Experience.

KAFB has operated as a large quantity generator (LQG) of hazardous waste for over thirty years. The installation most recently notified as an LQG as part of the biennial report, which was submitted on February 14, 2024. Hazardous waste management services are provided through a Base Operational Service (BOS) contract. Contractors manage one hazardous waste central accumulation area (CAA) at the installation and arrange for the transportation and off-site disposal of hazardous and universal wastes. The contractors also assist with making hazardous waste determinations and preparing waste profile records for any newly identified waste streams.

Hazardous wastes generated at KAFB are initially managed in a satellite accumulation area (SAA), which is referred to as an Initial Accumulation Point (IAP) by facility personnel. KAFB manages approximately 32 IAPs on-site. Each IAP is controlled by an IAP manager, who is responsible for notifying the CAA manager when a hazardous waste container is ready for transfer from the IAP to the CAA and for delivering the container to the CAA. Waste container transfers are routinely done on Tuesdays, but the IAP manager may arrange to transfer a container on another day if necessary. At least once every quarter, BOS environmental contractor personnel conduct inspections of each IAP to assess compliance with the RCRA regulations and to identify any new waste streams, which may need a hazardous waste determination.

In calendar year 2022, KAFB submitted a biennial report which identified the following types and volumes of hazardous waste generated by KAFB during calendar year 2021:

Waste	Waste Code(s)	Pounds
Hazardous Waste liquid (cadmium, chromium)	D006, D007	2,665
Waste environmentally hazardous substance, solid (lead filters)	D008	2,361
Waste ethyl alcohol solutions, liquid	D001	1,211
Waste petroleum distillates (naphtha)	D001	1,088
Hazardous waste solid (cadmium, chromium)	D006, D007	1,060
Waste environmentally hazardous substance solid (chromium, cadmium)	D006, D007	964
Waste aerosols, flammable	D001	639
Waste lithium hydroxide	D002	610
Hazardous waste, solid (chromium)	D007	513
Waste flammable liquids (benzene)	D001, D018	386
Waste paint related material	D001	327
Waste flammable liquids (ethidium bromide)	D001	211
Waste flammable solids (benzene)	D001, D018	184
Hazardous waste solid (lead)	D008	140
Hazardous waste liquid (chromium)	D006, D007	133
Waste combustible liquid (petroleum naphtha)	D039	83
Hazardous Waste liquid (barium)	D005	58
Waste petroleum distillates (clearite, naphtha)	D001	47

9) **Previous Inspection History**

MDEQ has conducted four RCRA CEIs at the subject facility during the past twenty years and found no violations during those inspections.

The EPA has conducted one RCRA CEI at the subject facility during the past twenty years. The EPA found five potential violations during that inspection, which was conducted on June 12, 2017. KAFB addressed all of the potential violations on or before October 18, 2017.

10) **Opening Conference**

On May 14, 2024, EPA inspector Laurie Benton DiGaetano, accompanied by Mississippi inspector William Rider, arrived at Keesler Air Force Base (Keesler) at approximately 8:30 AM. After checking in at the Visitor's Center and gaining access onto the installation, Janet Lanier, EMS Coordinator, and Bob Guerra, Environmental Manager, received the inspectors at approximately 9:50 AM. The inspectors introduced themselves, showed their credentials to Janet Lanier and Bob Guerra, 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 EPA inspector explained that 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.

Janet Lanier and Bob Guerra 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 Janet Lanier, Bob Guerra and Dekendrick January led the inspectors on a tour of the Facility operations.

11) Inspection Observations

Central Accumulation Area (CAA):

KAFB's CAA includes a small brick building, a covered storage pad surrounded by metal HazMat storage buildings, and an additional HazMat outbuilding all located within a locked chain link fence. The brick building was identified with a sign which read "caution," "hazardous waste storage" and "unauthorized personnel keep out" (Photo 1). The interior of the building was divided into four bays, which were separated by concrete block walls. Each bay was equipped with a blind sump for accumulating spilled or leaked liquids. The building was equipped with an emergency eyewash and shower unit, a fire extinguisher, an emergency telephone, a spill response kit, and an emergency alarm system. The inspectors also observed a "no smoking" sign in this area.

The first bay was identified for the storage of hazardous waste, and the inspectors observed four 55-gallon containers and one supersack of hazardous waste in this bay (Photo 2):

- One 55-gallon container labeled hazardous waste used aerosols, identified with a flammable gas DOT hazard sticker, and dated May 14, 2024;
- One 55-gallon container labeled hazardous waste empty aerosol spray cans, identified with a flammable gas DOT hazard sticker, and dated May 7, 2024;
- One 55-gallon container labeled hazardous waste used/expired adhesive containers, identified with a flammable solid DOT hazard sticker, and dated May 7, 2024;
- One 55-gallon container labeled hazardous waste contaminated solids, identified with a flammable solid DOT hazard sticker, and dated May 8, 2024; and
- One supersack labeled hazardous waste adhesives, identified with a flammable liquid DOT hazard sticker, and dated May 14, 2024.

The second bay was identified for the storage of supplies and wastes pending analysis. The inspectors observed one 55-gallon container labeled waste floor stripper and identified with a corrosive DOT hazard sticker (Photo 3). The container was marked as being "on hold pending analysis."

The inspectors observed spill response equipment and overpack containers in the third bay.

The fourth bay was identified for the storage of universal waste. The inspectors observed two individual lead-acid batteries, one box of non-spillable batteries, and twelve battery slabs in this

bay (Photo 4). The battery slabs were stacked on a wooden pallet and identified with a single universal waste label, dated September 6, 2023. Personnel stated that the two individual batteries and the box of batteries, which were not labeled as universal waste, were accepted at the CAA earlier that day.

Pursuant to 11 Miss. Admin. Code Pt. 3, R. 1.21 [40 C.F.R. § 273.14(a)], a SQHUW must label or mark each Universal Waste battery or container or tank 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).”

In an email from Janet Lanier on May 29, 2024, the inspectors received photographs documenting that KAFB had clearly labeled each battery as a universal waste battery.

The covered storage pad and surrounding HazMat storage buildings are referred to as Building 4442 or “the Awning.” The inspectors observed three salvage containers, one 55-gallon container, and one 35-gallon container on secondary containment pallets beneath the awning (Photos 5 and 6):

- One 35-gallon container labeled soil from poleyard and dated May 14, 2024;
- One 55-gallon container labeled machine dust and dated May 9, 2024; and
- Three salvage containers, each labeled machine dust and dated May 9, 2024.

Personnel stated that the contents of the containers will be sampled and analyzed to determine if the waste exhibits the toxicity characteristic of hazardous waste and if they contain material that is suitable for metals recycling.

In an email from Janet Lanier on May 29, 2024, the inspectors received photographs documenting that KAFB had clearly labeled each container to indicate that its contents may be hazardous waste.

One of the HazMat storage buildings surrounding the awning is used to store universal waste lamps. The inspectors observed two four-foot cylinders, two four-foot boxes, one three-foot box, and two two-foot boxes of universal waste lamps in this building. Each container was marked with an accumulation start date, and the oldest date was April 30, 2024. The three-foot box and each four-foot cylinder was labeled universal waste lamps, each four-foot box and two-foot box was labeled universal waste bulbs.

Pursuant to 11 Miss. Admin. Code Pt. 3, R. 1.21 [40 C.F.R. § 273.14(e)], a SQHUW must label or mark each lamp or container of lamps clearly with one of the following phrases: “Universal Waste – Lamp(s),” or “Waste Lamp(s),” or “Used Lamp(s).”

In an email from Janet Lanier on May 29, 2024, the inspectors received photographs documenting that KAFB had clearly labeled each box of used fluorescent lamps as universal waste lamps.

A second HazMat storage building surrounding the awning is used to store oily rags. The inspectors observed one 55-gallon container of used oily rags in this building.

The third HazMat storage building surrounding the awning is used to store universal waste batteries. The inspectors observed one pallet of battery slabs, which were shrink-wrapped and identified with a single universal waste battery label (Photo 7).

Pursuant to 11 Miss. Admin. Code Pt. 3, R. 1.21 [40 C.F.R. § 273.14(a)], a SQHUW must label or mark each Universal Waste battery or container or tank 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).”

In an email from Janet Lanier on May 29, 2024, the inspectors received a photograph documenting that KAFB had clearly labeled each battery as a universal waste battery.

In addition to the HazMat storage buildings surrounding the awning area, KAFB also manages hazardous wastes generated by the 81st Medical Group in a HazMat storage building / Flammable storage shed next to the brick building. The inspectors observed approximately sixteen containers, each with a capacity of 5-gallons or less, on shelving within this storage building (Photos 8 and 9):

- Two 5-gallon containers, one dated May 7, 2024, and the other dated May 14, 2024, each labeled hazardous waste xylene and identified with a flammable liquid DOT hazard sticker;
- Two 5-gallon containers, one dated May 7, 2024, and the other dated May 14, 2024, each labeled hazardous waste xylene and identified with a flammable liquid DOT hazard sticker;
- Two 5-gallon containers, one dated May 7, 2024, and the other date May 14, 2024, each labeled hazardous waste formalin and identified with a flammable liquid DOT hazard sticker;
- One 5-gallon container labeled nonregulated formamide and dated April 30, 2024;
- Three 5-gallon containers, one dated May 7, 2024, and two dated May 14, 2024, each labeled hazardous waste alcohol and identified with a flammable liquid DOT hazard sticker;
- One 5-gallon container, dated May 14, 2024, labeled hazardous waste chemo bags and identified with a Class 9 DOT hazard sticker;
- Three 5-gallon containers, dated May 14, 2024, each labeled hazardous waste pills and identified with a Class 9 DOT hazard sticker;
- One 1-gallon container, dated April 30, 2024, labeled hazardous waste cyclophosphamide and identified with a flammable liquid DOT hazard sticker; and
- Two 1-liter containers, dated April 30, 2024, each labeled hazardous waste ethidium bromide and identified with a flammable liquid DOT hazard sticker.

Because the DOT Class 9 label does not indicate any specific hazard associated with the waste, the EPA has determined that it is not appropriate to meet the RCRA indication of hazards labeling standard.

Pursuant to 11 Miss. Admin. Code Pt. 3, R. 1.3 [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 an indication of the hazards of the contents clearly visible for inspection on each container.

In an email from Janet Lanier on May 29, 2024, the inspectors received a photograph documenting that KAFB had added a toxic DOT hazard sticker to each container that was identified with a Class 9 DOT hazard sticker.

Building 4430 Vehicle Maintenance:

Personnel in the Vehicle Maintenance area of Building 4430 manage three SAAs for accumulating hazardous wastes generated by various activities conducted in this area. The first SAA is used to accumulate hazardous waste absorbent materials used to clean gasoline spills or leaks. The inspectors observed one 55-gallon container in this SAA (Photo 10). The container was labeled hazardous waste used pig-mats and it was identified with a flammable solid DOT hazard sticker. The second SAA is used to accumulate hazardous waste used fuel filters. The inspectors observed one 55-gallon container in this SAA (Photo 10). The container was labeled hazardous waste used fuel filters and identified with a flammable liquid DOT hazard sticker. The third SAA is used to accumulate hazardous waste used aerosol cans. The inspectors observed one 5-gallon container in this SAA (Photo 11). The container was labeled hazardous waste used aerosol cans and identified with a flammable liquid DOT hazard sticker. The inspectors also observed one 55-gallon container, which was labeled nonhazardous oil absorbent material and identified with a flammable solid DOT hazard sticker, for accumulating absorbent materials used to clean oil spills or leaks; one 55-gallon container, which was labeled used oil filters; and one 480-gallon tank, which was labeled “used oil” (Photo 12).

In an email from Janet Lanier on May 29, 2024, the inspectors received photographs documenting that KAFB had altered the spacing of the designated SAAs in order to improve accessibility to containers within each area.

403rd Aerospace Ground Equipment:

Activities in the 403rd Aerospace Ground Equipment area generate both hazardous and nonhazardous wastes. Mason Bridgett, Hazardous Waste Manager for this area, joined the inspection team during the tour of this area. Personnel manage three SAAs for accumulating hazardous wastes and two areas for accumulating nonhazardous waste. The hazardous and non-hazardous waste SAAs are located near one another in an area identified with a “no smoking” sign. Containers in each accumulation area are stored on portable secondary containment pallets. The inspectors observed one 55-gallon container for accumulating used coolant and another for accumulating used oil filters in this area.

The first SAA is used to accumulate hazardous waste Jet A/JP-15 fuel that is reclaimed from absorbent pads used to clean jet fuel leaks or spills. The inspectors observed one 55-gallon container in this SAA (Photo 13). The container was labeled hazardous waste Jet A/JP-15 and

identified with a flammable liquid DOT hazard sticker. This container shares a secondary containment pallet with a second 55-gallon container, which is used to accumulate the used absorbent pads after the jet fuel has been extracted from the pad. This container was labeled nonhazardous absorbent pads. The second SAA is used to accumulate hazardous waste used sumpers, which are applicators designed to store, mix, and apply pre-proportioned coating materials. The inspectors observed one 35-gallon container in this SAA (Photo 14). The container was labeled hazardous waste used sumpers and identified with a flammable solid DOT hazard sticker. The third SAA is used to accumulate hazardous waste used fuel filters. The inspectors observed one 55-gallon container in this SAA (Photo 14). The container was labeled hazardous waste used fuel filters and identified with a flammable liquid DOT hazard sticker.

Nonhazardous wastes generated in the 403rd Aerospace Ground Equipment area also include used coolant and used oil filters. The inspectors observed two 55-gallon containers for accumulating these materials (Photo 14). One container was labeled nonhazardous used coolant, and the other was labeled nonhazardous used oil filters.

403rd Propulsion Shop:

Activities in the 403rd Propulsion Shop generate both hazardous and nonhazardous wastes. Personnel manage three SAAs for accumulating hazardous wastes generated in this area (Photo 15). Containers in each accumulation area are stored on portable secondary containment pallets. The inspectors observed one 55-gallon container for accumulating drained oil filters as nonhazardous waste, one 55-gallon container for accumulating used absorbent material (oil) as nonhazardous waste, and one 55-gallon container for accumulating used propeller hub grease as nonhazardous waste.

The first SAA is used to accumulate hazardous waste solvent contaminated rags. The inspectors observed one 55-gallon container in this SAA. The container was labeled “excluded solvent / contaminated rags” and hazardous waste, and it was identified with a flammable solid DOT hazard sticker. The EPA inspector explained that the RCRA regulations have specific requirements for solvent contaminated rags that are managed as excluded solvent contaminated rags. KAFB personnel stated that they were not managing the rags under the exclusion and removed the words “excluded solvent” from the label.

The second SAA is used to accumulate used or expired hazardous waste adhesives. The inspectors observed one 55-gallon container in this SAA. The container was labeled hazardous waste used/expired adhesive containers and identified with a flammable solid DOT hazard sticker.

The third SAA is used to accumulate used aerosol cans. The inspectors observed one 55-gallon container in this SAA. The container was labeled hazardous waste empty/expired aerosol spray cans and it was identified with a flammable gas DOT hazard sticker.

Air Maintenance Squadron – Tool Crib:

Cleaning activities conducted in the Air Maintenance Squadron’s Tool Crib may generate hazardous waste used pig-mats, which are accumulated in one of two SAAs established in this area (Photo 16). The inspectors observed one 55-gallon container in this SAA. The container

was labeled hazardous waste used pig-mat and identified with a flammable solid DOT hazard sticker. Maintenance activities may also generate hazardous waste excess sealant, which is accumulated in the second SAA established in this area. The inspectors observed one 55-gallon container in this SAA. The container was labeled hazardous waste sealant, but it was not identified with an indication of the hazards of its contents.

Pursuant to 11 Miss. Admin. Code Pt. 3, R. 1.3 [40 C.F.R. § 262.15(a)(5)(ii)], which is a condition of the SAA Permit Exemption, a generator is required to mark or label its containers with an indication of the hazards of the contents.

In an email from Janet Lanier on May 29, 2024, the inspectors received a photograph documenting that KAFB had clearly labeled the container to indicate that it contains a flammable solid.

The inspectors also observed one 55-gallon container, which was labeled used oil, one ½-gallon container, which was labeled universal waste batteries and dated March 20, 2024, and one ½-gallon container, which was labeled universal waste lithium batteries and dated March 20, 2024, in this area.

803rd Air Maintenance Squadron:

KAFB manages one SAA for accumulating hazardous waste excess or used sealant generated in the 803rd Air Maintenance Squadron (Photo 17). The inspectors observed one 55-gallon container in this SAA. The container was labeled hazardous waste used sealant and identified with a flammable solid DOT hazard sticker. The inspectors also observed one 55-gallon container for accumulating used hydro fluid as nonhazardous waste, one 55-gallon container for accumulating used engine oil as nonhazardous waste, and one 55-gallon container for accumulating used pig-mats (oil) as nonhazardous waste.

Medical Center – Genetics Center:

The KAFB Medical Center manages one SAA for accumulating hazardous waste generated in the Genetics Center. Ed French joined the inspection team for the tour of the Medical Center. The inspectors observed two 1-gallon containers in this SAA (Photo 18). The first container was labeled hazardous waste ethidium bromide and identified with a flammable liquid DOT hazard sticker. The second container was labeled hazardous waste hemo De and identified with a flammable liquid DOT hazard sticker.

Medical Center – Radiology:

The KAFB Medical Center manages one SAA for accumulating hazardous waste generated in Diagnostics Imaging Exposure Room. The inspectors observed one 5-gallon container in this SAA. The container was labeled hazardous waste barium and identified with a Class 9 DOT hazard sticker. Because the DOT Class 9 label does not indicate any specific hazard associated with the waste, the EPA has determined that it is not appropriate to meet the RCRA indication of hazards labeling standard.

Pursuant to 11 Miss. Admin. Code Pt. 3, R. 1.3 [40 C.F.R. § 262.15(a)(5)(ii)], which is a condition of the SAA Permit Exemption, a generator is required to mark or label its containers with an indication of the hazards of the contents.

In an email from Janet Lanier on May 29, 2024, the inspectors received a photograph documenting that KAFB had clearly labeled the container to indicate that its 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 and Spill Prevention Control and Countermeasures Plan. The Hazardous Waste Management Plan, which was last updated on October 11, 2023, describes the hazardous waste management responsibilities and training requirements for installation personnel. KAFB maintains an on-site local police department, fire department, other emergency response teams, and local hospital. The emergency response plans are available to each of these entities on the installation's intranet.

The inspectors reviewed plans that describe 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 includes a list of emergency equipment, such as fire extinguishing systems, spill control equipment, communications and alarm systems, and decontamination equipment, available at the installation; and it includes an evacuation plan for personnel and describes signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes. The KAFB Chief of Fire and Emergency Services is identified as the primary emergency coordinator who can be reached via a 24-hour emergency number, which is included in the plan.

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

Training Records:

The inspectors reviewed records of employee hazardous waste training, including records of hazardous waste training provided to selected employees in 2023 and 2024.

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 during the past three years. The inspectors noted that no shipments were sent for approximately six months (180 days) between October 2022 and March 2023. In an email to the inspectors dated June 11, 2024, Janet Lanier explained that the Defense Logistics Agency (DLA), who is responsible for coordinating transport and disposal of all Air Force hazardous waste, reported a delay in waste disposal due to the mechanical issues at the Calvert City-Heritage incinerators and resulting backlog. KAFB was unable to find documentation that their facility requested an extension from MDEQ to store wastes on-site for greater than 90 days.

Pursuant to 11 Miss. Admin. Code Pt. 3, R. 1.3 [40 C.F.R. § 262.17(b)], an LQG who accumulates hazardous waste for more than 90 days is an operator of a storage facility and is subject to the requirements of the MHWMR, 11 Miss. Admin. Code Pt. 3, R.1.1-1.24 [40 C.F.R. parts 124, 264 through 268, and part 270], unless it has been granted an extension to the 90-day period. Such extension may be granted by EPA if hazardous wastes must remain on site for longer than 90 days due to unforeseen, temporary, and uncontrollable circumstances. An extension of up to 30 days may be granted by the Regional Administrator on a case-by-case basis.

In an email from Janet Lanier on June 11, 2024, KAFB provided documentation that the affected waste was eventually sent for disposal and that the facility has implemented additional oversight procedures to prevent a similar situation in the future.

Weekly Inspection Records:

The inspectors reviewed KAFB's available records of inspections of the hazardous waste central accumulation area (CAA) looking for leaking containers and deterioration of containers caused by corrosion or other factors since January 3, 2023. The records include an inspection checklist for the materials and containers, the facility and safety, and general conditions. Specifically, the materials and containers portion of the inspection checklist includes a log of observations of open containers, condition of containers, segregation of incompatible materials, earliest accumulation start date for hazardous waste, earliest accumulation start date for universal waste, hazardous waste stored over 90 days, accumulation start dates on containers, hazardous waste labels on containers, new containers included on inventory list, and 50-foot buffer to property line. The facility and safety portion of the inspection checklist includes a log of observations of available PPE, ventilation and alarm systems, emergency phone, spill equipment, warning signs, vapor-proof fixtures, personnel training, locks, fire extinguisher, and emergency shower/eyewash station. The general portion of the inspection checklist includes a log of observations of primary and alternate commanders, point of contact signs, hazardous waste management plan, SPCC plan, spill prevention contingency plan, and housekeeping. The records include the date and time of the inspection and the name and signature of the employee conducting the inspection.

13) Closing Conference

The inspectors conducted the exit meeting at 3:30 p.m. with the inspection participants Janet Lanier, Dekendrick January, and Robert Guerra, and with Lt. Col. Nicholas Thomas, 81 CES; Rene Rodriguez, Chief of Engineering and Installation Management; Robert Hagel, Director of Civil Engineering; and Robert Moseley, Deputy Base Civil Engineer. During this meeting, the inspectors stated their preliminary conclusions of the inspection.

In an email to the inspectors on May 29, 2024, Janet Lanier provided documentation of activities that KAFB had taken to address observations made during the inspection.

14) List of Attachments

Attachment 1 – Photo Log

15) Signed

LAURIE
DIGAETANO



Digitally signed by LAURIE
DIGAETANO
Date: 2024.07.12
08:51:55 -04'00'

Laurie Benton DiGaetano
Environmental Engineer

16) Concurrence

ALAN
NEWMAN



Digitally signed by ALAN
NEWMAN
Date: 2024.07.12
13:07:37 -04'00'

Alan R. Newman
Acting Chief, RCRA Enforcement Section

Attachment 1 – Photo Log

18 Photos taken on: May 14, 2024

Photos taken by: Laurie Benton DiGaetano

Photos taken with: Panasonic DMC TS-5

EPA Property Tag: S09533



Photo 1: Warning sign on small brick building at CAA.



Photo 2: Four 55-gallon containers and one supersack of hazardous waste in the first bay within the CAA.



Photo 3: One 55-gallon container of waste floor stripper pending hazardous waste analysis in the second bay within the CAA.



Photo 4: Two individual lead-acid batteries, one box of non-spillable batteries, and twelve battery slabs in the fourth bay within the CAA.



Photo 5: Three salvage containers, one 55-gallon container, and one 35-gallon container on pallets beneath the awning at the CAA.



Photo 6: Three salvage containers, one 55-gallon container, and one 35-gallon container on pallets beneath the awning at the CAA.



Photo 7: One pallet of shrink-wrapped battery slabs in a storage locker at the covered awning area of the CAA.



Photo 8: Approximately sixteen containers of hazardous waste, each with a capacity of 5-gallons or less, on shelving within a HazMat storage building / Flammable storage shed at the CAA.



Photo 9: Approximately sixteen containers of hazardous waste, each with a capacity of 5-gallons or less, on shelving within a HazMat storage building / Flammable storage shed at the CAA.



Photo 10: Two SAAs at the Building 4430 Vehicle Maintenance Area. One 55-gallon container for accumulating hazardous waste absorbent materials used to clean gasoline spills or leaks in one SAA. One 55-gallon container for accumulating hazardous waste pig-mats used to clean spills and leaks that are not gasoline in the second SAA.



Photo 11: The third SAA at the Building 4430 Vehicle Maintenance Area. One 5-gallon container for accumulating hazardous waste used aerosol cans as hazardous waste.



Photo 12: 480-gallon tank of used oil in the Building 4430 Vehicle Maintenance Area.



Photo 13: 55-gallon container for accumulating hazardous waste Jet A/JP-15 in a SAA at the 403rd Aerospace Ground Equipment Area.



Photo 14: 35-gallon container for accumulating used sumpens in a SAA at the 403rd Aerospace Ground Equipment Area, and one 55-gallon container for accumulating hazardous waste used fuel filters in another SAA at the 403rd Aerospace Ground Equipment Area.



Photo 15: Three SAAs at the 403rd Propulsion Shop: one 55-gallon container for accumulating hazardous waste used solvent rags in one SAA; one 55-gallon container for accumulating used or expired hazardous waste adhesives in a second SAA; and one 55-gallon container for accumulating used aerosol cans as hazardous waste in a third SAA.



Photo 16: Two SAAs at the Air Maintenance Squadron Tool Crib: one 55-gallon container for accumulating hazardous waste used pig-mats; and one 55-gallon container for accumulating hazardous waste sealant.



Photo 17: One 55-gallon container for accumulating used sealant in a SAA at the 803rd Air Maintenance Squadron.

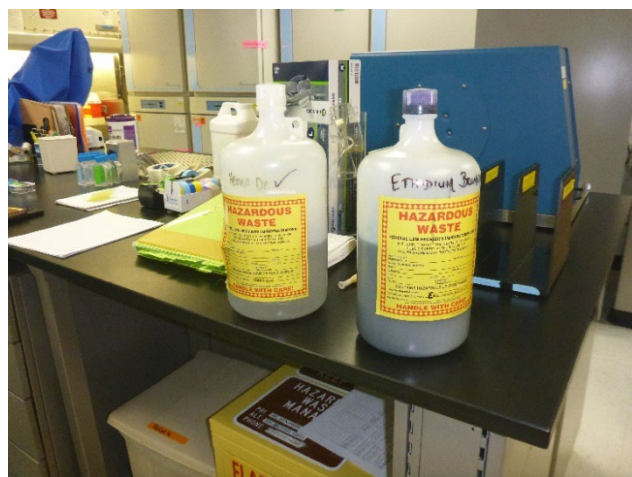


Photo 18: One 1-gallon container for accumulating hazardous waste ethidium bromide and one 1-gallon container for accumulating hazardous waste hemo De in a SAA at the Medical Center.