

RCRA Inspection Report

1) Inspector and Author of Report

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

2) Facility Information

MS ANG CRTC Small Arms Range
224 10th Avenue
Gulfport, Mississippi 39507
EPA ID No.: MSR000107672

3) Responsible Officials

Captain Thomas Brewer
Mississippi Air National Guard
Combat Readiness Training Center (MS ANG CRTC)

4) Inspection Participants

Koray “Noah” Akozbek, MS ANG CRTC
Sidney Collins, MS ANG CRTC
Brad Justice, Mississippi Department of Environmental Quality (MDEQ)
Raj Aiyar, EPA

5) Date of Inspection

November 17, 2021

6) Applicable Regulations

Mississippi Code of 1972, Miss. Code Ann. § 17-17-1 *et seq.* [Resource Conservation and Recovery Act (RCRA) Sections 3002, 3004, 3005, 3007 and 3008, (42 U.S.C. §§ 6922, 6924, 6925, 6927 and 6928)] and the Mississippi Department of Environmental Quality, Office of Pollution Control, Mississippi Hazardous Waste Management Regulations (MHWMR), 11 Miss. Admin. Code Pt. 3, R. 1.1-1.24, which adopts and incorporates by reference 40 C.F.R. Parts 260-270, 273, and 279 [40 Code of Federal Regulations (C.F.R.) Parts 260-270, 273, and 279].

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**

The purpose of this inspection was to conduct an announced RCRA compliance evaluation inspection (CEI), due to Covid-19, at the Mississippi Air National Guard (MS ANG) Combat Readiness Training Center (CRTC) to determine the facility's compliance status with the applicable RCRA regulations and the corresponding MDEQ regulations. This was an EPA lead inspection.

8) **Previous Inspection History**

No prior inspection was conducted at the facility by EPA and the State.

9) **Facility Description**

The MS ANG operates a small arms range located at the Gulfport Regional Airport at 224 10th Avenue, Gulfport, Mississippi, Harrison County. The small arms range is used by the State's Air National Guard - Active Duty and Reserve Units and by the local Law Enforcement Agency for various arms training exercises. The range is equipped with an impervious rubber barrier. Every three years the barrier is remediated by a contractor arriving onsite to sift the lead bullets from the rubber containment. The empty brass shells are collected in a container and recycled.

The MS ANG CRTC is registered with MDEQ as a small quantity generator of hazardous waste since June 24, 2016.

10) **Opening Conference**

On November 17, 2021, EPA inspector, Raj Aiyar, accompanied by MDEQ inspector Brad Justice, arrived at MS ANG Small Arms Range facility at approximately 9:00 a.m. Upon arriving at the facility, we were met by Mr. Noah Akozbek (MS ANG CRTC), Mr. Sidney Collins (MS ANG CRTC) and by Bobbie E. Berry (MS ANG CRTC). The inspectors presented their credentials to all the MS ANG CRTC personnel including Mr. Akozbek, Mr. Collins and to Ms. Berry. The inspectors then explained the purpose of the visit and discussed the scope of the inspection which included health and safety protocols, use of camera for the purpose of inspection, areas to be covered during the inspection and the list of records to be reviewed as part of the recordkeeping. Mr. Akozbek and Mr. Collins provided the inspectors the MS ANG CRTC Small Arms Range facility's brief history and current operation onsite. The inspectors were later accompanied by Mr. Akozbek, Mr. Collins, and Ms. Berry during the site visit.

11) **Findings**

The MS ANG CRTC Small Arms Range facility comprises of a building whose sides are made of reinforced concrete and slated wood panels as roof. The size of the range is approximately 250 feet in length and 200 feet wide (Photo-1). There are seventeen shooting lanes. The types of ammunition used at the firing range for practice include 9 mm, 5.56 mm, .223 mm and 12 gauge.

The range is equipped with an impervious rubber barrier (Photo-2). Every three years the barrier is remediated by a contractor arriving onsite to sift the lead bullets from the rubber containment. The empty brass shells are collected in a container and recycled.

According to MS ANG CRTC personnel, the Small Arms Range facility is not impervious to rain. The rainwater enters the building through the slated roof and washes down the range into a drain system that discharges to the two lagoons located behind the building (Photo-3). During a heavy rain event, the spillover from the both the lagoons floods the low-lying areas near the Small Arms Range facility. MS ANG CRTC personnel mentioned that the facility was waiting for the sample results from a recent sampling event conducted on the two lagoons for hazardous waste constituents. In response to a recent enquiry regarding the lab results, MS ANG CRTC personnel confirmed that the facility had still not received the lab results. Based on the lab results, MS ANG CRTC plans on taking necessary corrective action comprising of constructing a permanent metal roof with a storm drain system to prevent storm water wash out inside the Small Arms Range facility.

Record Review

The most recent review of the facility's hazardous waste manifest dated 8/19/2019 showed that 70 pounds of D008 waste was sent to Clean Harbors Laporte LLC (TXD982290140) for disposal. Based on the site inspection and the records, the facility was determined to be a Very Small Quantity Generator (VSQG) of hazardous waste. The recordkeeping and reporting requirement for VSQG are de minimis.

Closing Conference

An exit briefing was conducted at the conclusion of the inspection. During the exit briefing, the observations made during the inspection were discussed with Mr. Akozbek and Mr. Collins. Based on the review of the records and the site inspection, MS ANG CRTC facility appears to be a Very Small Quantity Generator (VSQG) of hazardous waste.

The inspectors expressed concern regarding potential lead contamination from the stormwater runoff to the lagoons and the surrounding site. The inspectors stated to the MS ANG personnel to coordinate their activities with the State to address the stormwater matter inside the building and to determine their generator status option based on the amount of hazardous waste generated at their facility. MS ANG CRTC personnel stated that they would provide a copy of the lab results and coordinate their activities regarding stormwater and hazardous waste generator status with MDEQ. After the closing conference, the inspection was concluded.

12) Signed

Raj Aiyar
Environmental Engineer

Date

Concurrence

Araceli B. Chavez
Chief
RCRA Enforcement Section

Date

ATTACHMENT A

MS ANG CRTC

Small Arms Range, Gulfport, Mississippi

COMPLIANCE EVALUATION INSPECTION

MSR000107672

November 17, 2021

Photos taken by Raj Aiyar, USEPA

CAMERA TYPE: SAMSUG, WB250F

EPA TAG NO.: S75912



Photo 1 – MS ANG Small Arms Range



Photo 2 – Impervious Rubber Barrier

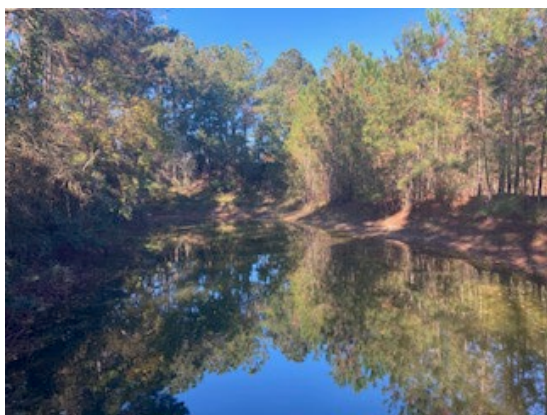


Photo 3 – Stormwater Lagoon