



REGION 1

BOSTON, MA 02109

December 11, 2024

Mr. Brian Hendrickson
Hazardous Waste Media Manager
Naval Submarine Base New London
RTE 12 Crystal Lake Road
Groton, CT 06340

Re: U.S. EPA-Region 1 Inspection Report of Naval Submarine Base New London, September 25 - 26, 2024

Dear Mr. Hendrickson:

In accordance with current policy, I am providing you with a copy of the final inspection report summarizing observations made during the September 25 - 26, 2024, inspection of your facility.

This inspection was conducted under the authority of RCRA.

Please contact me at 617-918-1163 or patel.hardik@epa.gov if you have any questions.

Sincerely,

**Patel,
Hardik**

Digitally signed by
Patel, Hardik
Date: 2024.12.11
10:24:13 -05'00'

Hardik V. Patel
Environmental Engineer

cc: Joseph Schiavone, CT DEEP

ENVIRONMENTAL PROTECTION AGENCY

REGION 1 – NEW ENGLAND

5 POST OFFICE SQUARE, SUITE 100
BOSTON, MASSACHUSETTS 02109-3912

RCRA Compliance Inspection of:

Naval Submarine Base New London
RTE 12 Crystal Lake Road
Groton, CT 06340

September 25th – 26th, 2024
Dates of Inspection

Patel,
Hardik

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Date: 2024.12.11 10:24:02
-05'00'

Hardik V Patel, Environmental Engineer
Waste and Chemical Compliance Section

December 10, 2024
Date Inspection Report Approved

O'Donnell, Mary
Jane

Digitally signed by O'Donnell,
Mary Jane
Date: 2024.12.10 16:54:35
-05'00'

Mary Jane O'Donnell, Manager
Waste and Chemical Compliance Section

December 10, 2024
Date Inspection Report Finalized

December 11, 2024
Date Inspection Report Transmitted to Facility

Disclaimer: Unless otherwise noted, this report describes conditions at the facility/property as observed by EPA inspector(s), and/or through records provided to and/or information reported to EPA inspector(s) by facility representatives and as understood by the inspector(s). This report may not capture all operations or activities ongoing at the time of the inspection. This report does not make final determinations on potential areas of concern. Nothing in this report affects EPA's authorities under federal statutes and regulations to pursue further investigation or action.

RCRA HAZARDOUS WASTE INSPECTION REPORT

I. GENERAL INFORMATION

- a. **Facility Name:** Naval Submarine Base New London (the “facility”)
- b. **Inspection Dates:** September 25 - 26, 2024
- c. **Inspection Type:** RCRA Compliance Evaluation Inspection (CEI)
- d. **EPA Inspectors:** Bryan Gonzalez, Biologist, EPA Headquarters
Justin Young, Physical Scientist, EPA Headquarters
Adam Plourde, Physical Scientist, EPA Region 1
Hardik Patel, Environmental Engineer, EPA Region 1
- e. **EPA ID Number:** CT4170022020
- f. **NAICS:** 928110 – National Security
336611 – Ship Building and Repairing
- g. **Street Address:** RTE 12 Crystal Lake Road, Groton, CT 06340
- h. **Mailing Address:** P.O. Box 400, Pw Env HW Branch, Groton, CT 06349
- i. **Facility Contact(s):** Brian Hendrickson, Hazardous Waste Media Manager
Email: brian.g.hendrickson.civ@us.navy.mil
- j. **Generator Status:** Large Quantity Generator (LQG)
Treatment, Storage, and Disposal (TSD) facility
- k. **Date first notified as a generator (per RCRAInfo):** 08/18/1980
- l. **Date of most recent notification in RCRAInfo:** 03/01/2024
- m. **Current Property Owner:** US Navy
- n. **Current Operator:** US Navy
- o. **Wastes generated (per most recent RCRAInfo notifications):** D001, D002, D003, D004, D005, D006, D007, D008, D009, D010, D011, D018, D019, D021, D022, D023, D025, D026, D027, D035, D039, D040, D043, F001, F002, F003, F005, P030, P042, P081, U002, U031, U044, U072, U075, U080, CR01, CR02, CR04, CR05

Report Attachments:

ATTACHMENT 1 – Photo Log

ATTACHMENT 2 – Map of Facility

ATTACHMENT 3 – TSDF Inventory

II. FACILITY DESCRIPTION

The Naval Submarine Base New London is located on the Thames River in Groton, Connecticut. It is the oldest submarine base in the United States and has a robust history dating back over a century. Originally acquired by the U.S. Navy in 1868 as a coaling station for refueling ships, the site officially became a submarine base in 1915. The designation marked the Navy's recognition of submarines as a vital element of modern warfare, and it quickly transformed into a center for submarine activity.

Today, Naval Submarine Base New London remains the primary east coast base for the U.S. Navy's submarine fleet. It houses a significant portion of the nation's nuclear-powered submarines and serves as the Navy's premier training location for new submarine crews. According to the facility's permit, Naval Submarine Base New London is a large quantity generator (LQG) of hazardous waste and a Treatment, Storage, and Disposal Facility (TSDF) for storage of hazardous waste (HW). The facility generates, treats, and stores waste, including, but not limited to ignitable solvents (D001), corrosives (D002), reactive (D003), toxicity characteristic waste (D004-D043), universal waste, precious metals, used oil and state-regulated wastes.

III. INSPECTION OPENING CONFERENCE

The facility was notified of the RCRA inspection on Thursday, September 19, 2024, via an email to Christopher Koproski, Installation Environmental Program Director. The inspection team arrived at the facility on Wednesday, September 25, 2024, at 08:00 AM. The EPA inspection team ("inspection team") consisted of Bryan Gonzalez (EPA HQ), Justin Young (EPA HQ), Adam Plourde (EPA Region 1), and Hardik Patel (EPA Region 1). The inspection team met with Brian Hendrickson, Hazardous Waste Branch Manager, at the Visitors Pass Office and was escorted to a conference room where Christopher Koproski was present and introduced himself to the inspection team.

During the opening conference, facility staff and the inspection team members introduced themselves and signed in on the sign-in sheet provided by EPA. The inspection team then presented their EPA credentials. Inspector Gonzalez discussed inspection procedures, including the right to claim confidential business information (CBI) and the need to take photographs during the inspection. The inspection team provided an overview of the scope of the inspection

to the present personnel, including why the facility was selected for inspection. Inspector Gonzalez also let the facility know that a closing conference would be conducted at the end of the inspection to discuss any findings or areas of concern observed during the inspection. The following personnel were present for all or part of the opening conference:

EPA:	Bryan Gonzalez, Biologist, EPA Headquarters Justin Young, Physical Scientist, EPA Headquarters Adam Plourde, Physical Scientist, EPA Region 1 Hardik Patel, Environmental Engineer, EPA Region 1
The Facility:	Brian Hendrickson, Hazardous Waste Media Manager Christopher Koproski, Installation Environmental Program Director

Facility employees and EPA inspectors discussed the following information about the facility processes and operations during the opening conference and inspection walkthrough:

Christopher Koproski has been in his current position for about 18 months but a total of twelve (12) years with the installation. Brian Hendrickson has spent thirteen (13) years in waste management but a total of fifteen (15) years with the installation. The base has many different buildings of which approximately thirty-eight (38) are related to the hazardous waste program. The facility operates one TSDF, thirteen (13) Central Accumulation Areas (CAAs), and sixty-five (65) Satellite Accumulation Areas (SAAs). There are more than 9,000 personnel on the facility. The base operates 24 hours a day, 7 days a week, but the TSDF operation hours are limited to 06:00 AM – 03:30 PM, Monday – Friday with no weekend operations.

The inspection team inquired about the Facility's waste streams and waste production processes. The Facility relies on generator knowledge for the waste determinations. Wastes are generated at ship building locations, ship maintenance areas, auto hobby shop, hospitals, labs, powder coating shop, dental clinic, pharmacy, gas station, Navy exchange, veterinary office, indoor range, and armory. No wastes are stored in tanks. The facility does not conduct open burning/open detonation (OB/OD) activities. The facility does generate different types of mixed waste such as cadmium, chromium, and lead. There are no exempted wastes at this facility. Brian Hendrickson explained that there are three (3) processes for treatment of hazardous waste conducted at the TSDF: oil filter crushing, mercuric nitrate reclamation and aerosol can puncturing. Every waste profile is reviewed annually using generator knowledge.

After the inspectors finished their interview, Christopher Koproski presented a safety briefing for the facility. The opening conference concluded at approximately 09:25 AM, and the team proceeded to the TSDF, building 562, to begin the inspection. At the TSDF, Brian Hendrickson provided the inspection team with a map of all facilities and locations where hazardous waste is stored (*Attachment 2*). The inspection team laid out a plan to see the several of the CAAs and SAAs after inspection of the TSDF was completed. Photos were allowed to be taken by the EPA

inspection team in accordance with security and safety requirements. Brian Hendrickson and David Carter, Lead Environmental Protection Specialist, accompanied the inspection team for the facility walkthrough portion of the inspection.

IV. FACILITY TOUR

The facility tour or walkthrough portion of the inspection began at approximately 09:35 AM on September 25, 2024. The following personnel were present for all or part of the tour:

EPA:	Bryan Gonzalez, Biologist, EPA Headquarters Justin Young, Physical Scientist, EPA Headquarters Adam Plourde, Physical Scientist, EPA Region 1 Hardik Patel, Environmental Engineer, EPA Region 1
The Facility:	Brian Hendrickson, Hazardous Waste Media Manager David Carter, Lead Environmental Protection Specialist

Inspector Gonzalez took photographs to document the inspection observations which are included in *Attachment 1*.

DAY - 1, September 25, 2024

Building - 562: TSDF

The building has an office space for administrative work and recordkeeping pertaining to the hazardous waste program. The building also contains a staging area, process room, 9 (nine) bays with roll up doors and blind sumps. Each bay was designated for a particular type of waste: acid; reactive; oxidizer; ignitable; universal; alkaline; 2 (two) bays for toxic; and state-regulated waste.

The staging area is where waste is received and recorded into the Chemical Safety - Environmental Management System (CM-EMS). Cory Cavanaugh, Environmental Protection Specialist, coordinates with David Carter to unload, stamp and weigh the received waste. The waste information is recorded on the facility's internal 1348 form. From here the waste is moved into one of the bays based on its waste profile designation.

The Process Room is the location in which three types of treatment of hazardous waste occurs:

1. **Oil Filter Crushing** – A process used to reduce the size and volume of used oil filters which are classified as hazardous waste due to the residual oil they contain. The process extracts the remaining oil for proper recycling and disposal. There was oil waste stored in a 5-gallon container and crushed filters stored in a 55-gallon container in the area at

the time of the inspection. All containers were closed and labeled as state- regulated waste.

2. **Mercuric Nitrate Reclamation** – A process of recovering and reusing mercuric nitrate. A chemical and/or physical process is used to isolate the mercuric nitrate from other components. The waste mercuric nitrate solution passes by tubing through three (3) filters and into a 5-gallon waste container. Brian Hendrickson explained to the inspection team that all filters are disposed of as non-HW, and the liquid waste is disposed of as state-regulated waste. The tubing also gets managed as HW when changed. Daily inspections are done on the mercuric nitrate filters. Containers all had labels on them and were covered.
3. **Aerosol Can Puncturing** – A process used to manage and dispose of aerosol cans which are considered hazardous waste when not completely emptied. Brian Hendrickson explained that the process involves puncturing the cans to release any remaining contents and propellants making the cans easier to recycle as scrap metal. A 55-gallon drum is being used to store the aerosol residuals, labeled as HW liquid/flammable. A 55-gallon plastic drum is used to store empty/punctured aerosol cans, labeled “empty aerosol cans”.

The inspection team then proceeded into a passageway with nine (9) individual bays, four (4) bays on each side of the passageway and one (1) at the end. Each of the nine (9) bays were designated for storage of a specified category of waste. Each bay had a rollup door, and a “blind sump”, a trench in the floor designed to capture and hold spilled materials. The blind sump was covered by grating and had no valves, piping, or other outlet device.

The inspection team proceeded to inspect all bays and document their contents. A current inventory list of all the stored waste to date was provided to the inspectors for reference (*Attachment 3*). All contents on inventory sheet matched what was observed by the inspectors.

Universal Waste Bay – Contained one (1) 3-gallon box labeled Universal Waste (UW) Waste Lamps Fluorescent, four (4) 4 ft. lamp tube containers labeled waste lamps, two (2) 55-gallon drums labeled waste alkaline batteries dry, two buckets (5-gallon, 3-gallon) labeled waste batteries dry Nicad. All boxes and containers were against each wall, closed, and with the label visible.

Alkaline Bay – Contained six (6) 3-gallon buckets labeled monoethanolamine and water, on one pallet, three (3) 55-gallon plastic drums each labeled Monoethanolamine and water, Ammonium hydroxide/zinc oxide, bulked alkaline waste. All drums were on a plastic pallet in the middle of the room. One (1) cubic yard box labeled HW bulked alkaline waste. One (1) corrosive locker that was closed, contained 50+ quart size bottles all labeled ammonium oxide, zinc oxide, bottles all closed. All boxes and containers were closed inside the bay.

Toxics II Bay – Contained one (1) 55-gallon drum, closed, labeled HW SHT tiles (lead) and one (1) cubic yard box, closed, labeled HW SHT tiles (Lead). Both containers were on pallets in the middle of the room and in good condition.

Toxics I Bay – Contained two (2) 55-gallon drums, closed, labeled Lead dust debris (Lead), One (1) 55-gallon drum, closed, labeled Weapons ranch maintenance debris (lead); one (1) 1.5-gallon recyclable waste box labeled Nicotine containing products; one (1) 55-gallon drum, closed, labeled HW Waste fluorescent lamps (broken)(mercury).

Connecticut Regulated/PCB Waste Bay – Contained four (4) 55-gallon drums, closed, on a pallet stacked on top of another four (4) 55-gallon drums, closed, on a pallet each labeled used oil, ozzy juice/dirt, cleaner lubricants, and preservative debris. The four (4) bottom 55-gallon drums were labeled sand, water, trace metals, epoxy, teflon from water jet cutter (liquid); Eleven (11) 55-gallon drums labeled sand/water; eight (8) 55-gallon drums, closed, labeled used oil; one (1) 55-gallon drum, closed, labeled Lithium hydroxide canisters, blankets, pillows; One (1) 55-gallon drum, closed, labeled monitoring well purge water; one (1) 1 cubic yard box, lined and closed, labeled waste latex paint; one (1) cubic yard box, lined and closed, labeled liquid medical/dental/pharmaceutical; one (1) cubic yard box, lined and closed, labeled filters from abrasive blasting booths; one (1) tote, closed and on containment, labeled bulked CR04 waste. All containers were in good condition and labeled properly.

Flammable Bay – Contained one (1) 55-gallon drum, closed, labeled flammable and non-regulated aerosols; one (1) 55-gallon drum, closed, labeled NEX consumer cosmetics; one (1) 55-gallon drum, closed, labeled adhesive waste; one (1) 55-gallon drum, closed, labeled alcohol waste; one (1) 55-gallon drum, closed, labeled NEX cosmetics; one (1) 55-gallon drum, closed, labeled aerosol residuals; one (1) 10-gallon bucket labeled paint waste; two (2) 55-gallon drums, closed, labeled gasoline/oil/water. All containers were stored on pallets, in good condition and with sufficient spacing between them.

Oxidizer Bay – Contained two (2) 3-gallon containers, closed, labeled silver nitrate waste; one (1) seven-gallon container, closed, labeled hydrogen peroxide; one (1) 5-gallon bucket, closed, labeled bulked nitric acid; one (1) 7-gallon bucket, closed, labeled inorganic solid oxidizers; one (1) 1-gallon bucket, closed, labeled double junction inner solution; four (4) 1 cubic yard boxes , closed, labeled oxygen candles. Cubic yard boxes were stored in a line on pallets but there was no space in between each one for aisle space.

Reactive Bay – Contained one (1) 30-gallon plastic drum, closed, labeled UW batteries (Li); four (4) 55-gallon drums, closed, labeled vermiculite; one (1) 1-gallon bucket stored in locker, closed, labeled Li batteries. Back of room also contained a pallet of new cubic yard boxes.

Acid Bay – Contained a pallet of lead acid batteries with only large batteries having a label on them; one (1) 7-gallon bucket, closed, labeled HW inorganic acid; one (1) 3-gallon container, closed, labeled HW silica standard from water testing with no date; two (2) 3-gallon buckets, closed, labeled HW hydrochloric acid and HW fuji capsule.

Warning signs were posted throughout the TSDF, and emergency pull stations were in accessible areas. A fire suppression system was installed, along with an emergency eye wash station. Evacuation routes were posted throughout the facility and inspections logs were kept in a binder.

Building - 1: Site - A13, Port Services

Waste stored in this location primarily comes from boats. Site contained one (1) 2-gallon pail, one (1) 7-gallon pail, one (1) bag (triple bagged) of state-regulated waste consisting of oily rags, and one (1) 55-gallon drum of used oil. All waste was stored on secondary containment pallets. CAA signage was hanging from the ceiling, Brian Hendrickson mentioned it was because the sign kept falling off the wall. Spill kit was present and complete. A binder was present and contained training slides, weekly inspections, and training certificates.

Building - 38: Site – A02, Carpenter Shop

This location is managed by Gavin Richardson. No smoking and CAA signage were present. Site was a metal pod and contained three (3) bags of boat tiles labeled state-regulated waste; eight (8) bags of sealants labeled state-regulated waste; one (1) empty 55-gallon drum; one (1) 55-gallon drum labeled caulks, adhesives, and glue; one (1) bag of gloves labeled chromium gloves; and two (2) 1-litre universal waste containers for batteries. A binder was available and contained training slides, weekly inspections, and training certificates. A spill kit was also present and appeared to be complete.

Building - 38: Site – TSPR, Spruce Barge

This site was a metal pod directly adjacent to Site - A02, Carpenter Shop. The CAA contained two (2) 55-gallon drums with used painting brushes, rollers, and trays. labeled state-regulated waste. CAA and no smoking signage present. A binder was available and contained training slides, weekly inspections, and training certificates. A spill kit was present and appeared to be complete but did not have a cover on it.

Pier - 13: Site – TAPN, Portsmouth

Richard Bergeron and Camille St. Hilaire are the point of contact (POC's) for this site and were present. Richard explained that waste stored here consists of paint waste, SHT tile, rags, brushes, rollers, trays, gloves, respirators cartridges, Tyvek suits, used oil, grease light bulbs,

aerosols and batteries that come off boats. There was no hazardous waste at this location at the time of the inspection. CAA and no smoking signage were present. A binder was available and contained training slides, weekly inspections logs, and training certificates. Site also had a fire extinguisher present. In addition, a spill kit was present and appeared to be complete.

Building - 174: Site – A44, R6 99C/E Powder Coat

The site contained one (1) 55-gallon drum containing IPA/Mineral Spirit Rags, one (1) state-regulated waste 55-gallon drum containing solid paint waste (non-PCB), one (1) state-regulated waste 55-gallon drum containing solid paint debris, one (1) 1-gallon universal waste pail containing manganese dioxide batteries, one (1) 3-gallon pail containing respirator cartridges, one (1) 1-gallon pail containing plastisol stripped waste. CAA and no smoking signage were present. A binder was available and contained training slides, weekly inspections logs, and training certificates. The site had a fire extinguisher present. Spill kit was present and appeared to be complete.

Building - 174: Site – S83, R6 99C/E Powder Coat

This SAA site was located at the same building as Site - A44, but outside. This site had two (2) 55-gallon drums that were labeled as solid paint debris from blasting. A binder was available and contained training slides, weekly inspections logs, waste profiles and training certificates. SAA signage was present.

Building - 174: Site – S81, R6 99C/E Powder Coat

This SAA site was located at the same building as Site - A44 but was inside next to the paint ovens. The site had one (1) 55-gallon drums that contained powder paint waste. A binder was available and contained training slides, weekly inspections logs, waste profiles and training certificates. SAA signage was present.

Building - 175: Site – A38, FSG

This site was used for waste from maintenance of buildings (lightbulbs, oily rags, batteries). The site was empty when inspected. CAA and no smoking signage were present. Binder was available and contained training slides, weekly inspections logs, and training certificates. Additionally, site had a fire extinguisher present. Spill kit was present and appeared to be complete.

Building - 83: Site – A04, Outside Machine Shop

The site contained one (1) 5-gallon bucket labeled HW de-stainer/parts washer. A spill kit was present but was stored inside a plastic tub with no cover. CAA signage was present, no smoking

sign was present but severely faded. A binder was available and contained training slides, weekly inspections logs, and training certificates. This site also had a fire extinguisher present.

Building - 456: Site – A19, R4 Electrical Division

The site was empty when inspected. CAA signage was present, no smoking sign was on the ground. Brian Hendrickson reattached the sign during inspection. A binder was available and contained training slides, weekly inspections logs, and training certificates. The site had a fire extinguisher present.

Building - 478: Site – S45, Hull Division

The site contained one (1) 3-gallon universal waste pail labeled Li batteries, one (1) 2-gallon universal waste pail labeled alkaline batteries, one (1) 3-gallon universal waste pail labeled Ni-Cd battery, one (1) 3-gallon pail labeled fluorescent bulbs mercury, one (1) 3-gallon state-regulated waste pail labeled greasy/oily rags, one (1) 30-gallon drum labeled hazardous waste adhesive debris (MEK) Toxic, one (1) 10-gallon drum state-regulated rags, one (1) 55-gallon drum with HW labeled leather rags/gloves (chromium toxic), one (1) 55-gallon drum state-regulated waste respirator cartridges. All drums were closed and labeled. A binder was available and contained training slides, weekly inspections logs, and training certificates. Site had a fire extinguisher present. SAA and no smoking signage were present. EPA inspector Justin Young questioned if the site was near or at the point of generation for some of the waste stored here; David Carter stated he would find out more about information on this.

Building - 612: Site – A42, Small Arms Range

This site was inside an indoor shooting range. The site contained one (1) 55-gallon drum labeled hazardous waste lead dust debris (toxic). A binder was available and contained training slides, weekly inspections logs, waste profiles and training certificates. CAA and no smoking signage were present. The site had a fire extinguisher present.

Building - 612: Site – S125, Firing Range (Hopper)

This site was located outside and behind the site - A42, Small Arms Range. The site contained one (1) 55-gallon drum labeled HW lead dust debris, one (1) 55-gallon drum labeled scrap metal for recycling. All drums were closed and labeled. A binder was available and contained training slides, weekly inspections logs, and training certificates. The site had a fire extinguisher and the presence of spill kit. SAA and no smoking signage were present.

Building - 325: Site – A18, Weapons 91E

This site contained two (2) bags of state-regulated waste labeled rags/wipes, one (1) bag labeled hazardous waste spent aerosol paint cans. A binder was available and contained

training slides, weekly inspections logs, and training certificates. The site had a fire extinguisher and spill kit at the time of the inspection. CAA and no smoking signage were present. The inspection team proceeded to the vehicle maintenance area of Building - 325. Inspector Gonzalez noticed used rags with unknown residue on them inside one of the trash bins. The inspection team also observed a puddle of oily fluid on the floor underneath one of the vehicles. Brian Hendrickson explained that the maintenance of the vehicles is performed by contractors. No secondary containment was present in the building where the vehicles were being worked. Photos were taken of the oily fluid on the ground and the rags inside of the trash can (Attachment 1, Photo 26 and 27).

The inspection team concluded the walkthrough portion of the inspection for the first day at approximately 04:15 PM.

DAY - 2, September 26, 2024

Building - 451: Site – A40, PWD Shop

This site contained one (1) 55-gallon drum labeled universal waste lead acid batteries, one (1) 55-gallon drum labeled state-regulated waste non-PCD light ballast, one (1) 55-gallon drum labeled state-regulated waste fluorescent light bulbs (PCB), two (2) boxes of mercury lamps and LED lamps, one (1) 3-gallon pail with Ni-Cd batteries, one (1) 1-gallon pail with lithium batteries, two tube boxes with mercury and LED lamps. CAA and no smoking signage were present. Binder was available and contained training slides, weekly inspections logs, and training certificates. The site had a fire extinguisher present. Spill kit was present and appeared to be complete.

Building - 449: Site – S131, Pharmacy

The inspection team met with Ann Ricca, the safety coordinator at the Navy Health Clinic. This site contained expired or almost expired medication. Waste observed included: one (1) 1-litre bottle labeled hazardous waste, waste containing nitro reaction, one (1) 1-litre bottle labeled hazardous waste pharmaceutical debris, one (1) 2-gallon pail labeled state-regulated waste with waste code CR05 pharmaceutical waste, one (1) 2-gallon pail labeled state-regulated waste with waste code CR04 pharmaceutical waste, one (1) 3-gallon pail labeled flammable pharmaceutical, one (1) 3-gallon pail labeled bulk chemo drugs (flammable), one (1) 3-gallon pail labeled regulated aerosol (flammable), one (1) 3-gallon pail labeled D004-0043 (toxic) pharmaceutical. SAA and no smoking signage were present. A binder was available and contained training slides, weekly inspections logs, and training certificates. Spill kit was present and appeared to be complete. POC for this SAA no longer worked for the base and was still identified as the POC on the sign posted in the area.

Building - 449: Site – S133, Laboratory

This site contained one (1) 1-gallon pail labeled state-regulated waste heel warmers, one (1) 100-ml container labeled spent slide stainer. A binder was available and contained training slides, weekly inspections logs, and training certificates. A spill kit was present and appeared to be complete.

Building – S75: Site – S138, RI Orthopedics

The site contained one (1) 2-litre container labeled state-regulated waste liquid plaster trap. Binder was available and contained training slides, weekly inspections logs, and training certificates. A spill kit was present and appeared to be complete.

Building – 449: Site – A17, Naval Branch Health Clinic

The site contained one (1) 10-gallon container labeled Dorl (flam) medical waste, one (1) 2-gallon pail labeled universal waste batteries, one (1) 55-gallon container labeled state-regulated waste bulked med/dental waste, one (1) plastic bag with a spent aerosol can (lysol disinfectant), and one (1) fluorescent lamp box labeled universal waste. A binder was available and contained training slides, weekly inspections logs, and training certificates. A spill kit was present and appeared to be complete.

Building – 575: Site – S108, Dental Clinic

This site contained one (1) 1-gallon pail labeled hazardous waste dental amalgam for recycling toxic (mercury). A binder was available and contained training slides, weekly inspections logs, and training certificates. A spill kit was present and appeared to be complete.

Building – 574: Site – S96, Coastal Riverine Co

This site receives waste from boat and truck maintenance. Site has a self-contained sewer with an oil-water separator. State-regulated waste consisted of one (1) 55-gallon drum of diesel fuel, one (1) 5-gallon pail of rags, one (1) 5-gallon pail of used oil, one (1) 55-gallon drum of used oil. Hazardous waste consisted of one (1) 5-gallon pail of spent aerosols, and one (1) 55-gallon drum of grease and oil rags. EPA inspector Bryan Gonzalez observed a bin that contained mixed used chemical containers and spent rags near one of the storage racks in the building. The hazardous waste coordinator of this site immediately moved the contents of the bin to the SAA for disposal. A binder was available and contained training slides, weekly inspections logs, and training certificates. The site had a fire extinguisher and spill kit present. SAA and no smoking signage were present.

Building – 535: Site – S75, Marina

Waste here is generated from the boats at the marina. The site contained one (1) 55-gallon drum labeled state-regulated waste greasy/oily rags, one (1) 55-gallon drum labeled HW

gasoline/oil, one (1) 2-gallon pail labeled state-regulated waste antifreeze, one (1) 20-gallon red can with the word “rags” written on it. A binder was available and contained training slides, weekly inspections logs, and training certificates. The site had a fire extinguisher and spill kit present. SAA and no smoking signage were present. The inspection team walked down to the marina and observed a spill kit by the dock that was filled with water due to a crack on the top lid. Brian Hendrickson mentioned that the spill kit was not part of the SAA and did not know where it came from. While walking out on the marina dock the inspection team observed a bucket with used rags inside that was not labeled. The marina hazardous waste coordinator did not know where the bucket or its contents came from.

Building – 176: Site – S71, Weapons Ranch

This site contained one (1) 55-gallon container labeled weapons ranch maintenance debris (lead), one (1) 3-gallon pail labeled state-regulated waste rags for laundering, one (1) 3-gallon container labeled state-regulated waste used oil for recycling. A binder was available and contained training slides, weekly inspections logs, and training certificates. The site had a fire extinguisher and spill kit present. SAA and no smoking signage were present.

At 11:00 AM, the inspection team concluded the walkthrough portion of the inspection and returned to the conference room at the TSDF, Building - 562 for the records review portion of the inspection.

V. RECORDS REVIEW

Contingency Plan and Quick Reference Guide

The inspection team reviewed the contingency plan and quick reference guide for the facility. The contingency plan included emergency evacuation routes, emergency response procedures, a phone number for the SUBASELON Regional Dispatch Center, and a list of emergency response equipment.

The quick reference guide included the evacuation and emergency response procedures, a map showing where hazardous waste is generated and accumulated on site, and another map showing the facility in relation to surrounding businesses, schools, and residential areas. Lastly, the guide included the information of an onsite notification systems or alarms, and the name and telephone number for the emergency contact for the area. Inspector Patel noted that an update was needed for the emergency contact person. No primary or secondary coordinator was listed.

Waste Shipments Manifests and Land Disposal Restrictions

The inspection team reviewed a sample of hazardous waste manifests and land disposal restriction notifications from the date of the last inspection. The manifests were signed by Brian

Hendrickson, David Carter and Eugenie Kelly who all had received hazardous waste management training to sign manifests.

When reviewing the manifests, the inspector observed the waste was shipped to the following TSDFs:

- Heritage Environmental Services
- Veolia ES Technical Solutions, AZ
- Veolia ES Technical Solutions, IL
- Ross Incineration Services
- Veolia ES Technical Solutions, TX
- Veolia ES Technical Solutions, WI
- Clean Harbors El Dorado
- Clean Earth of Calvert City
- Soring Grove Resource Recovery
- Clean Harbors Reidsville
- Clean Earth of Alabama
- Safety-Kleen Systems
- Norfolk Naval Shipyard
- Northland Environmental
- Enviroline of Pennsylvania
- Tradebe T&R of Stoughton

The inspector noted no issues with the manifests and land disposal restriction forms that were reviewed at the time of the inspection.

Training Records

Training records were reviewed for hazardous waste handlers who managed hazardous waste and those the inspection team met during the facility tour, as well as employees that signed hazardous waste manifests on behalf of the facility. The records reviewed during the inspection contained the topics for which the waste handlers are trained, a job description, and the initial and annual retraining certification dates. Based on a review of the training records, the inspectors observed that the waste handlers did receive annual training. Inspector Patel noted that Brian Hendrickson, David Carter, Eugenie Kelly, and Cory Cavanagh were missing training records for 2021. Brian Hendrickson explained that the reason for the lapse in training was due to Covid-19.

Biennial Reports

Inspector Gonzalez reviewed the facility's last two (2) Biennial Reports, 2021 and 2023. The facility reported as a LQG of hazardous waste. Waste codes reported by the facility were, but not limited to: D001 D002 D003 D004 D005 D006 D007 D008 D009 D010 D011 D018 D019 D021

D022 D023 D025 D026 D027 D035 D039 D040 D043 F001 F002 F003 F005 P030 P042 P081
U002 U031 U044 U072 U075 U080.

Weekly Inspection Logs

The inspection team reviewed weekly inspections logs for all SAAs, CAAs and permitted storage areas. More information about the weekly inspections can be found in Section IV of this report under the facility tour write up for each CAA and permitted storage area. The inspection team noted no issues with the weekly inspections.

VI. INSPECTION CLOSING CONFERENCE

A closing conference was conducted on September 26, 2024, at approximately 03:25 PM, prior to leaving the facility. The following personnel were present for the closing conference:

EPA:	Bryan Gonzalez, Biologist, EPA Headquarters Justin Young, Physical Scientist, EPA Headquarters Adam Plourde, Physical Scientist, EPA Region 1 Hardik Patel, Environmental Engineer, EPA Region 1
The Facility:	Brian Hendrickson, Hazardous Waste Media Manager Christopher Koproski, Installation Environmental Program Director Dawn Works-Dennis, DPWO-PWD, David Carter, Lead Environmental Protection Specialist

The inspection team ensured the facility personnel understood that the comments and observations made during the closing conference may not be all inclusive and that any preliminary observations discussed were not compliance determinations. All preliminary observations shared were subject to further investigation by EPA staff upon the additional review of records and documentations. The facility representatives were reminded that they could make claims of CBI on the material gathered during the inspection. No such CBI claims were made.

Areas of Concern:

The presentation of areas of concern does not constitute a formal compliance determination or violation.

1. Container in Building - 574 near Site - S96 had spent mixed products (bottles/rags) in it instead of being placed in SAA.

2. The unknown fluid spill under vehicle in Building - 325 in an area with no secondary containment. Trash can next to vehicle had spent rags inside with unknown substance on them.
3. One (1) 55-gallon used oil drum near Site - A13 did not have state-regulated waste label on it.
4. Building – 83: Site - A04, had “No Smoking” sign that was severely faded.
5. Building – 478: Site - S45, had a 30-gallon drum with MEK that was not at or near the point of generation.
6. Building – 456: Site - A19, had a “No Smoking” sign that had fallen and was on the ground.
7. The Contingency Plan did not have update regarding the emergency contact since 2022.
8. David C., Brian H., Cory C., Eugenie K., did not receive RCRA training in calendar year 2021 while the base was still operating and generating hazardous waste.
9. The dock across the Marina had a 5-gallon bucket that contained spent rags inside of it. No label was on the bucket and no lid.

After discussing the above areas of concerns, the inspection team explained the next steps in the inspection process, which included the inspection team writing an inspection report and providing a copy to the facility within 70 days of the inspection.

The inspection team thanked facility personnels’ for their time and cooperation with the inspection activities and left the premises at 03:45 PM, concluding the on-site portion of the inspection.

Naval Submarine Base New London
RTE 12 Crystal Lake Road, Groton, CT 06340
Inspection Dates: 09/25-26/2024

ATTACHMENT 1

Photo Log

Note: EPA inspectors were permitted to take photographs with their smartphone.

DATE TAKEN: 09/25/2024	
TAKEN BY: Bryan Gonzalez	SITE LOCATION: TSDF – TSDF (B-562) Staging Area
PHOTO #: 1 COMMENTS: View of loading bay at TSDF with hopper containing state regulated waste.	

DATE TAKEN: 09/25/2024	
TAKEN BY: Bryan Gonzalez	SITE LOCATION: TSDF (B-562) Staging Area
PHOTO #: 2 COMMENTS: View of staging area at the TSDF - Building 562.	

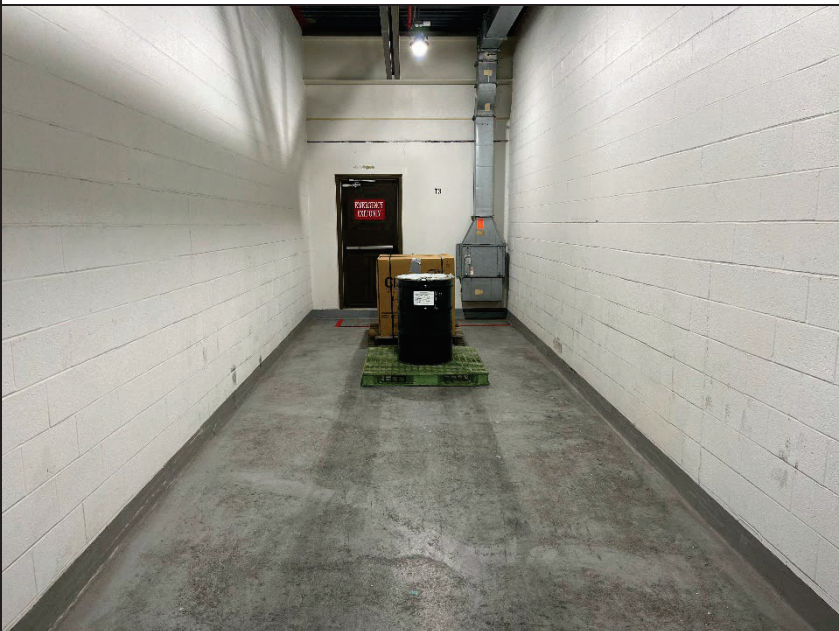
DATE TAKEN: 09/25/2024	
TAKEN BY: Bryan Gonzalez	SITE LOCATION: TSDF (B-562) Process Room
PHOTO #: 3 COMMENTS: View of Oil Filter Crusher and 50-gallon drum for storage of crushed filters.	

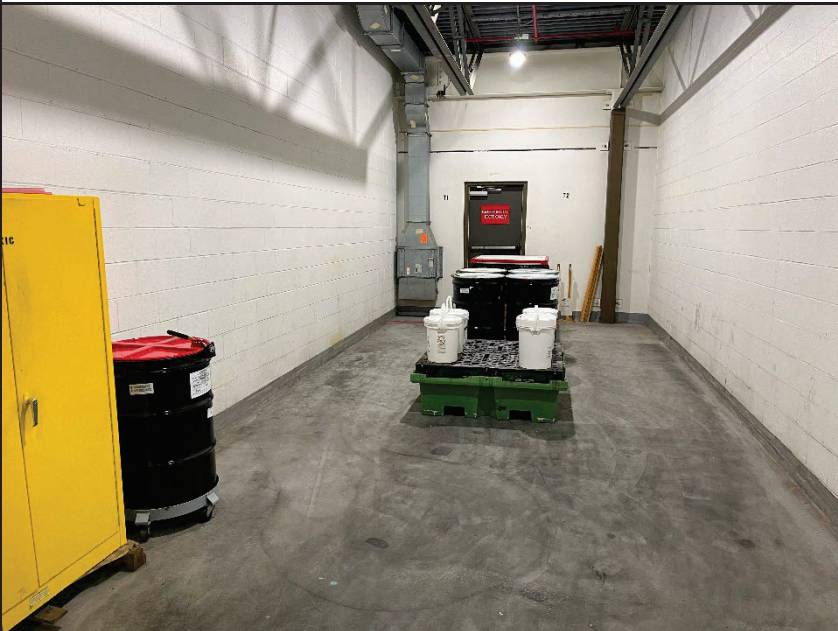
DATE TAKEN: 09/25/2024	
TAKEN BY: Bryan Gonzalez	SITE LOCATION: TSDF (B-562) Process Room
PHOTO #: 4 COMMENTS: View of Mercuric Nitrate Reclamation area with 5-gallon waste container.	

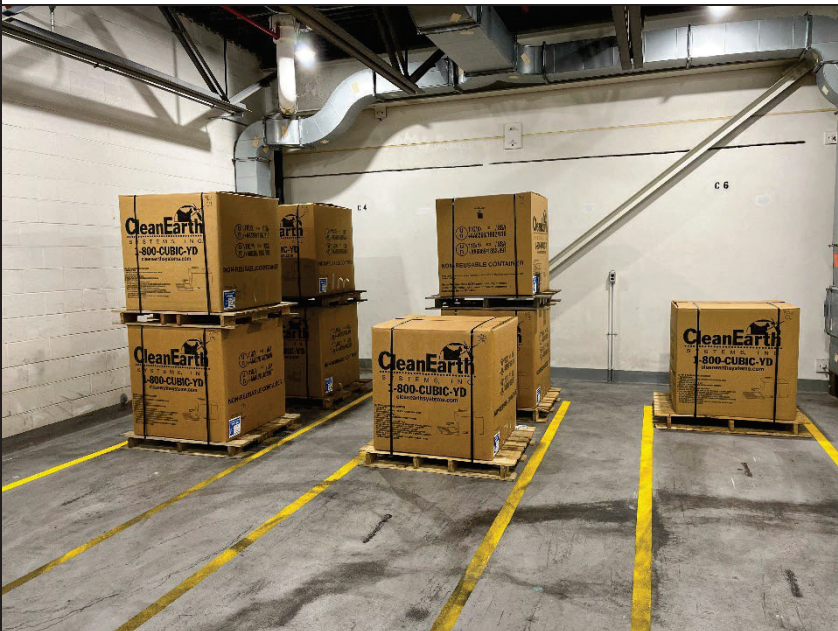
DATE TAKEN: 09/25/2024	
TAKEN BY: Bryan Gonzalez	SITE LOCATION: TSDF (B-562) Process Room
PHOTO #: 5 COMMENTS: View of Aerosol Can Puncturing area. 55-gallon drum used to store aerosol residual and plastic drum used to store empty/punctured aerosol cans.	 A photograph of a storage area in a process room. In the foreground, a green plastic pallet holds a white plastic drum with a label and a blue 55-gallon drum. To the right, another blue 55-gallon drum is visible, partially covered in paint splatters. In the background, there are shelves with various containers and a wall with some equipment.

DATE TAKEN: 09/25/2024	
TAKEN BY: Bryan Gonzalez	SITE LOCATION: TSDF (B-562) Universal Waste Bay
PHOTO #: 6 COMMENTS: View of inside Universal Waste storage room.	 A photograph of the interior of a Universal Waste storage room. The room has white cinder block walls and a concrete floor. On the left side, there are several rows of yellow drums. On the right side, there are orange and white boxes, some of which are labeled 'CleanEarth'. In the background, there is a dark door and some equipment.

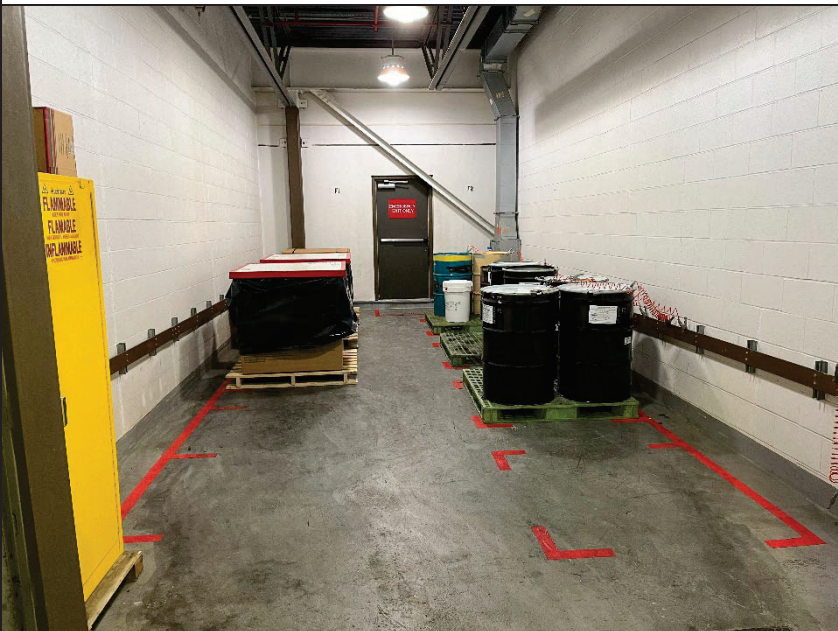
DATE TAKEN: 09/25/2024	
TAKEN BY: Bryan Gonzalez	SITE LOCATION: TSDF (B-562) Alkaline Waste Bay
PHOTO #: 7 COMMENTS: View of inside Alkaline Waste storage room.	

DATE TAKEN: 09/25/2024	
TAKEN BY: Bryan Gonzalez	SITE LOCATION: TSDF (B-562) Toxic II Bay
PHOTO #: 8 COMMENTS: View of inside Toxic II storage room.	

DATE TAKEN: 09/25/2024	
TAKEN BY: Bryan Gonzalez	SITE LOCATION: TSDF (B-562) Toxic I Bay
PHOTO #: 9 COMMENTS: View of inside Toxic I storage room.	

DATE TAKEN: 09/25/2024	
TAKEN BY: Bryan Gonzalez	SITE LOCATION: TSDF (B-562) PCB Waste Bay
PHOTO #: 10 COMMENTS: View of inside the PCB waste storage room facing right.	

DATE TAKEN: 09/25/2024	
TAKEN BY: Bryan Gonzalez	SITE LOCATION: TSDF (B-562) PCB Waste Bay
PHOTO #: 11 COMMENTS: View of inside the PCB waste storage room facing left.	

DATE TAKEN: 09/25/2024	
TAKEN BY: Bryan Gonzalez	SITE LOCATION: TSDF (B-562) Flammable Waste Bay
PHOTO #: 12 COMMENTS: View of inside Flammable Waste storage room.	

DATE TAKEN: 09/25/2024	
TAKEN BY: Bryan Gonzalez	SITE LOCATION: TSDF (B-562) Oxidizer Waste Bay
PHOTO #: 13 COMMENTS: View of inside the Oxidizer Waste storage room.	

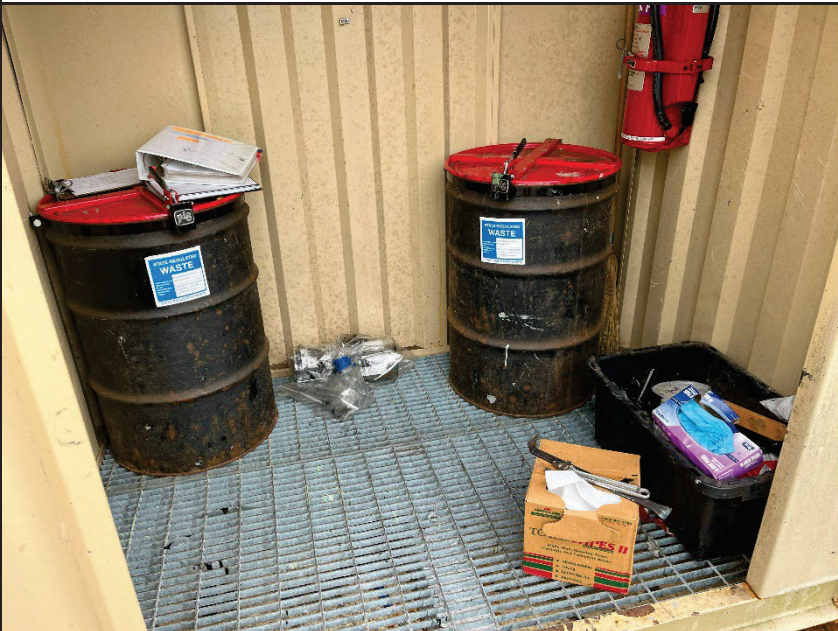
DATE TAKEN: 09/25/2024	
TAKEN BY: Bryan Gonzalez	SITE LOCATION: TSDF (B-562) Reactive Waste Bay
PHOTO #: 14 COMMENTS: View of inside the Reactive Waste storage room.	

DATE TAKEN: 09/25/2024	
TAKEN BY: Bryan Gonzalez	SITE LOCATION: TSDF (B-562) Acid Waste Bay
PHOTO #: 15 COMMENTS: View of inside the Acid Waste storage room.	

DATE TAKEN: 09/25/2024	
TAKEN BY: Bryan Gonzalez	SITE LOCATION: TSDF (B-562) Staging Area
PHOTO #: 16 COMMENTS: Pallet of waste received during inspection of TSDF. Waste had come off a submarine.	

DATE TAKEN: 09/25/2024	
TAKEN BY: Bryan Gonzalez	SITE LOCATION: A13, Port Services (B-1)
PHOTO #: 17 COMMENTS: View of inside CAA A13, Port Services.	

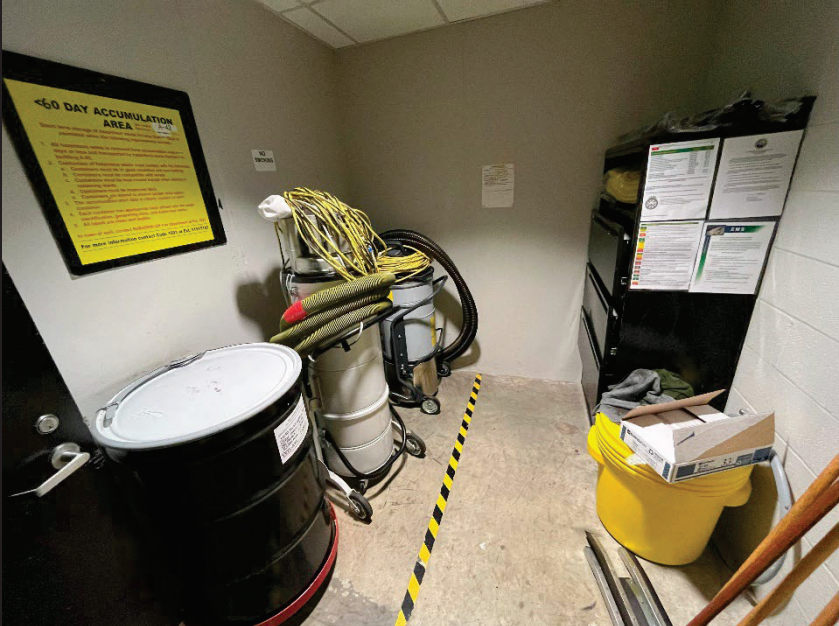
DATE TAKEN: 09/25/2024	
TAKEN BY: Bryan Gonzalez	SITE LOCATION: A02, Carpenter Shop (B-38)
PHOTO #: 18 COMMENTS: View of inside CAA A02, Carpenter Shop.	

DATE TAKEN: 09/25/2024	
TAKEN BY: Bryan Gonzalez	SITE LOCATION: TSPR, Spruce Barge (B-38)
PHOTO #: 19 COMMENTS: View of inside CAA TSPR, Spruce Barge.	

DATE TAKEN: 09/25/2024	
TAKEN BY: Bryan Gonzalez	SITE LOCATION: A44, Powdercoating (B-174)
PHOTO #: 20 COMMENTS: View of CAA for the Powder Coating Building.	

DATE TAKEN: 09/25/2024	
TAKEN BY: Bryan Gonzalez	SITE LOCATION: A04, Outside Machine Shop
PHOTO #: 21 COMMENTS: View of CAA R9 Outside Machine Shop.	

DATE TAKEN: 09/25/2024	
TAKEN BY: Bryan Gonzalez	SITE LOCATION: S45, Hull Division (B-478)
PHOTO #: 22 COMMENTS: View of SAA S45 Hull Division. Site will be converted to a CAA after review of process and point of generation.	

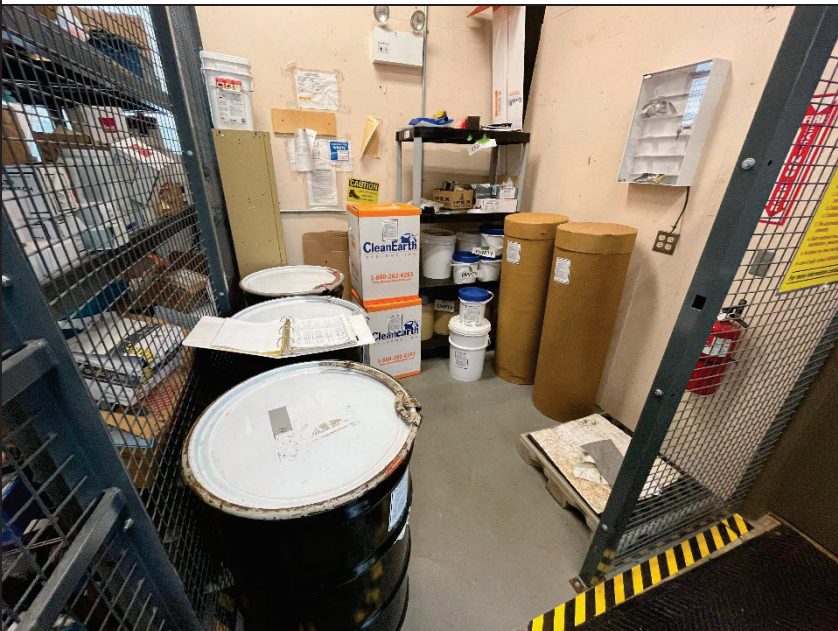
DATE TAKEN: 09/25/2024	
TAKEN BY: Bryan Gonzalez	SITE LOCATION: A42, Small Arms Range (B-612)
PHOTO #: 23 COMMENTS: View of CAA Small Arms Range. Spent rag was observed on top of spill kit.	

DATE TAKEN: 09/25/2024	
TAKEN BY: Bryan Gonzalez	SITE LOCATION: S125, Firing Range (Hopper)
PHOTO #: 24 COMMENTS: View of SAA Firing Range located outside of building B-612	

DATE TAKEN: 09/25/2024	
TAKEN BY: Bryan Gonzalez	SITE LOCATION: A18, Weapons 91E (B-325)
PHOTO #: 25 COMMENTS: View of inside CAA Weapons 91E.	

DATE TAKEN: 09/25/2024	
TAKEN BY: Bryan Gonzalez	SITE LOCATION: B-325 Vehicle Maintenance Area
PHOTO #: 26 COMMENTS: Spent rags with unknown solvent observed inside a mix garbage bag.	

DATE TAKEN: 09/25/2024	
TAKEN BY: Bryan Gonzalez	SITE LOCATION: B-325 Vehicle Maintenance Area
PHOTO #: 27 COMMENTS: Oily residue dripping from vehicle parked in the Vehicle Maintenance Area. No drip pan being used.	

DATE TAKEN: 09/26/2024	
TAKEN BY: Bryan Gonzalez	SITE LOCATION: A40, PWD Shops (B-451)
PHOTO #: 28 COMMENTS: View of inside CAA PWD Shop.	

DATE TAKEN: 09/26/2024	
TAKEN BY: Bryan Gonzalez	SITE LOCATION: S131, Pharmacy (B-449)
PHOTO #: 29 COMMENTS: View of SAA at the Naval Health Clinic Pharmacy.	

DATE TAKEN: 09/26/2024	
TAKEN BY: Bryan Gonzalez	SITE LOCATION: A17, Naval Branch Health Clinic (B-449)
PHOTO #: 30 COMMENTS: View of inside SAA A17 Naval Branch Health Clinic.	

DATE TAKEN: 09/26/2024	
TAKEN BY: Bryan Gonzalez	SITE LOCATION: S133, Laboratory (B-449)
PHOTO #: 31 COMMENTS: View of the SAA at the Naval Health Clinic Laboratory.	

DATE TAKEN: 09/26/2024	
TAKEN BY: Bryan Gonzalez	SITE LOCATION: S138, Orthopedics (B-449)
PHOTO #: 32 COMMENTS: View of the SAA at the Naval Health Clinic Orthopedics Area.	

DATE TAKEN: 09/26/2024	
TAKEN BY: Bryan Gonzalez	SITE LOCATION: S96, Coastal Riverine (B-574)
PHOTO #: 33 COMMENTS: View of SAA at the Coastal Riverine Building.	

DATE TAKEN: 09/26/2024	
TAKEN BY: Bryan Gonzalez	SITE LOCATION: S96, Coastal Riverine (B-574)
PHOTO #: 34 COMMENTS: View of bin containing spent rags and used chemicals outside of SAA area.	

DATE TAKEN: 09/26/2024	
TAKEN BY: Bryan Gonzalez	SITE LOCATION: S75, Marina (B-535)
PHOTO #: 35 COMMENTS: View of SAA at the Marina.	

DATE TAKEN: 09/26/2024	
TAKEN BY: Bryan Gonzalez	SITE LOCATION: S75, Marina (B-535)
PHOTO #: 36 COMMENTS: View of outside SAA. Site is located across the street from the actual Marina.	

DATE TAKEN: 09/26/2024	
TAKEN BY: Bryan Gonzalez	SITE LOCATION: S75, Marina (B-535)
PHOTO #: 37 COMMENTS: Spill kit located at the marina dock. Spill kit was in disrepair and had water inside due to a crack in the cover. All contents had water damage and were unusable.	

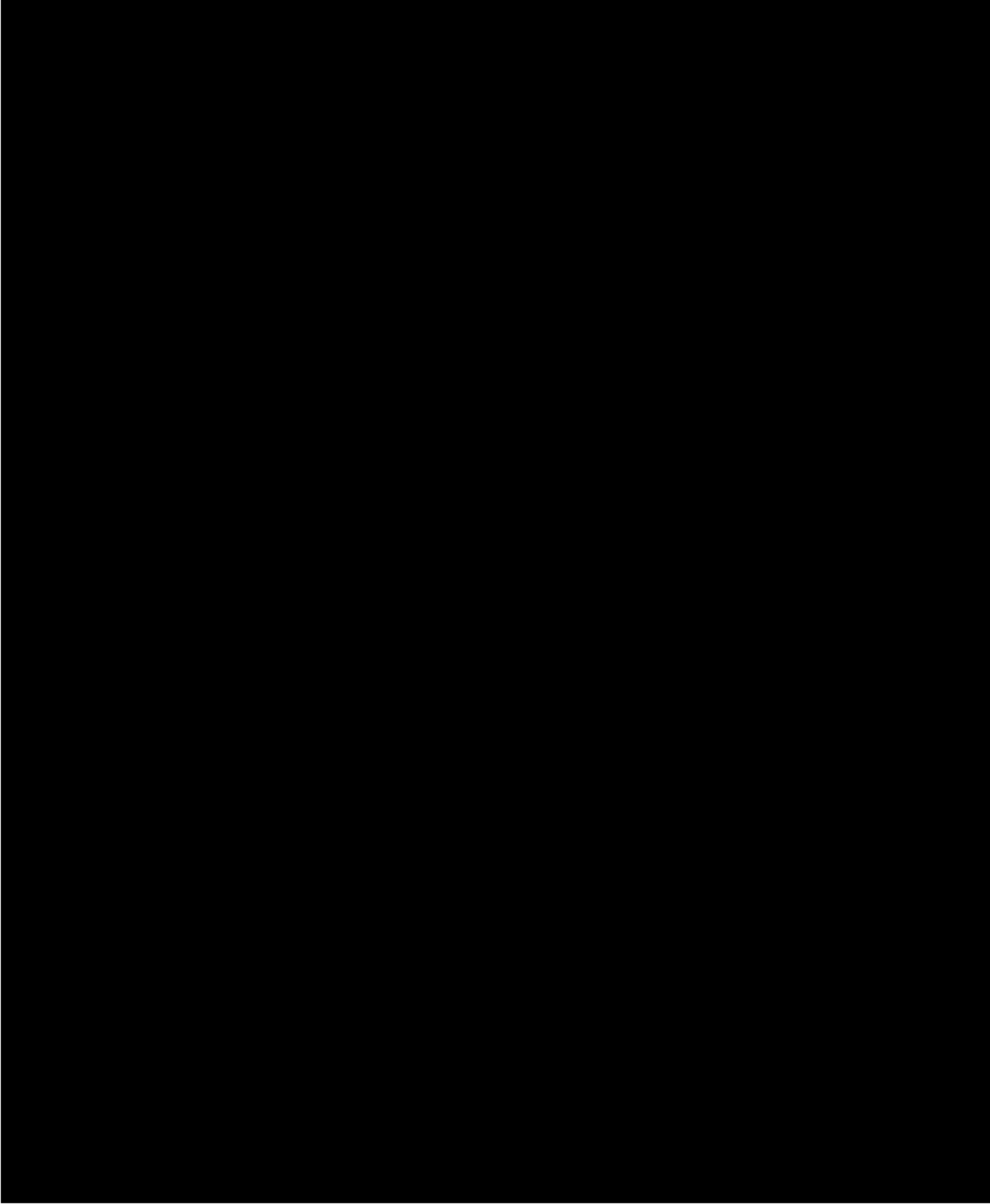
DATE TAKEN: 09/26/2024	
TAKEN BY: Bryan Gonzalez	SITE LOCATION: S75, Marina (B-535)
PHOTO #: 38 COMMENTS: 5-gallon bucket observed on the dock at the marina. Contents were spent rags, lubricants, and trash.	

Naval Submarine Base New London
RTE 12 Crystal Lake Road, Groton, CT 06340
Inspection Dates: 09/25-26/2024

ATTACHMENT 2

Map of Facility

(b) (3) (B), (b) (7)(E), (b) (7)(F)



(b) (3) (B), (b) (7)(E), (b) (7)(F)

Naval Submarine Base New London
RTE 12 Crystal Lake Road, Groton, CT 06340
Inspection Dates: 09/25-26/2024

ATTACHMENT 3

TSDF Inventory

LOC	Drum Id	Internal Profile	Waste Description	Opened	Closed	AGE	EPA Codes	Tid #	Status
A1	24268-50A	P1728	REAGENTS/SILICA STANDARD FROM PURE WATER TESTING (ACID)	9/24/2024	9/24/2024	1	DO02	N400854268NL50	COMPLETE
	24045-26A	P1887	INORGANIC ACID	2/14/2024		224	DO02	N400854045NL26	WRITE-UP
A-51	24239-26A	P0425	WASTE BATTERIES, WET (LEAD ACID)	8/26/2024		30	UNIV	N400854239NL27	WRITE-UP
	24250-26A	P0192	ACTVATED CHARCOAL W/ OR W/O MONOETHANOLAMINE	9/6/2024		19	CR05	N400854250NL26	WRITE-UP
AL	24002-28A	P0028A	MERCURIC NITRATE SOLUTION (ACID)(MERCURY)	1/2/2024		267	DO02,DO09	N400854002NL28	TEMP
	24030-26A	P2083	C G FUJI CAPSULES (ACID)	1/25/2024		244	DO02	N400854030NL26	WRITE-UP
	24180-26A	P2081	BULKED HYDROCHLORIC ACID (ACID)	6/28/2024		89	DO02	N400854180NL26	WRITE-UP
	24002-31A	P2002	BULKED ALKALINE WASTE	1/2/2024	9/16/2024	267	DO02	N400854002NL29	COMPLETE
B1	24002-29A	P0909	MONOETHANOLAMINE & WATER (ALKALINE)	1/2/2024		267	DO02	N400854002NL30	TEMP
	24002-30A	P0016	POTASSIUM HYDROXIDE (ALKALINE)	1/2/2024		267	DO02	N400854073NL50	WRITE-UP
	24073-50A	P0018	AMMONIUM HYDROXIDE / ZINC OXIDE AMMONIUM HYDROXIDE (POUR OFF)(ALKALINE)	4/16/2024		162	DO02	N400854264NL27	WRITE-UP
	24128-27A	P0909	MONOETHANOLAMINE & WATER (ALKALINE)	5/7/2024		141	DO02	N400854128NL27	WRITE-UP
B540	24264-32A	P2002	BULKED ALKALINE WASTE	9/23/2024		2	DO02	N400854264NL32	WRITE-UP
	24054-26A	P1258	USED OIL (FOR RECYCLING) (HYDRAULIC OIL/LUBE OIL/MOTOR OIL)	2/23/2024	8/28/2024	215	CR02	N400854054NL26	COMPLETE
B542	24264-26-31A	D28TX	LUBRICATING OIL, STEAM TURBINE	9/20/2024	9/20/2024	5	CR02	N400854264NL26	COMPLETE
	24150-50A	P0425	WASTE BATTERIES, WET (LEAD ACID)	5/29/2024	8/23/2024	119	UNIV	N400854150NL50	COMPLETE
BL	24002-27A	P0018	AMMONIUM HYDROXIDE / ZINC OXIDE AMMONIUM HYDROXIDE (POUR OFF)(ALKALINE)	1/2/2024		267	DO02	N400854002NL27	TEMP
	24226-26A	P1257	USED OIL - (FILTERS FOR RECYCLING) (HYDRAULIC OIL/LUBE OIL/MOTOR OIL/DIESEL)	8/13/2024	9/13/2024	43	CR02	N400854226NL26	COMPLETE
C1	24263-28A	P1296	USED OIL (AND WATER)	9/19/2024	9/23/2024	6	CR02	N400854253NL26	COMPLETE
	24253-26-28A	P1700A-S45	SAND, WATER, TRACE METALS & EPOXY, PLEXIGLASS, TEFLON FROM WATER JET CUTTER (LIQUID)	9/19/2024	9/9/2024	16	CR04	N400854253NL26	COMPLETE
	24256-28A	P2046	OZZY JUICE AND DIRT FROM PARTS WASHER	9/12/2024	9/12/2024	13	CR04	N400854256NL28	COMPLETE
	24263-29-32A	P1700A-S42	SAND, WATER, TRACE METALS & EPOXY, PLEXIGLASS, TEFLON FROM WATER JET CUTTER (LIQUID)	9/19/2024	9/23/2024	6	CR04	N400854263NL26	COMPLETE
C2	24261-26A	P0004G	SANDING/SANDBLAST BEADS, DUST, & DEBRIS (NON-REG)	9/13/2024	9/13/2024	12	CR05	N400854257NL26	COMPLETE
	24261-26A	P1204D TEST	CLEANER, LUBRICANT AND PRESERVATIVE DEBRIS	9/17/2024	9/17/2024	8	CR05	N400854261NL26	COMPLETE
	24261-26T	P1204D TEST	CLEANER, LUBRICANT AND PRESERVATIVE DEBRIS	9/17/2024	9/17/2024	8	CR05	N400854261NL26	PENDING A
	23341-26A	P1296	USED OIL (AND WATER)	12/7/2023	8/13/2024	293	CR02	N400854178NL27	COMPLETE
C3	24178-27A	P1257	USED OIL - (FILTERS FOR RECYCLING) (HYDRAULIC OIL/LUBE OIL/MOTOR OIL/DIESEL)	6/26/2024	8/13/2024	91	CR02	N400854178NL27	COMPLETE
	24204-26A	P0318	USED OIL (REFRIGERANT COMPRESSOR)	7/22/2024	8/6/2024	65	CR02	N400854204NL26	COMPLETE
	24221-26A	P1296	USED OIL (AND WATER)	8/8/2024	8/8/2024	48	CR02	N400854221NL26	COMPLETE
	24005-28A	P1666	BULK WATER FROM MERCURY SEPARATION SYSTEM	1/5/2024	9/17/2024	264	CR04	N400854005NL28	COMPLETE
C4	24260-27-29A	P1700A-S45	SAND, WATER, TRACE METALS & EPOXY, PLEXIGLASS, TEFLON FROM WATER JET CUTTER (LIQUID)	9/16/2024	9/16/2024	9	CR04	N400854260NL27	COMPLETE
	24061-26A	P1819	BULKED CR04 WASTE	3/1/2024		208	CR04	N400854060NL26	WRITE-UP
	24127-26A	P2145	WASTE LATEX PAINT	5/6/2024		142	CR04	N400854127NL26	WRITE-UP
	24170-26A	P2058	LIQUID - MEDICAL, DENTAL, AND PHARMACEUTICALS	6/18/2024		99	CR04	N400854170NL26	WRITE-UP
C5	KTR00867	P1999-IR	MONITORING WELL PURGE WATER	12/7/2023		293	CR04	N400854234NL27	WRITE-UP
	24078-26A	P1814	FILTERS FROM ABRASIVE BLASTING BOOTH	3/18/2024		191	CR05	N400854078NL26	WRITE-UP
	24261-27A	P0051	LITHIUM HYDROXIDE CANISTERS, BLANKETS, PILLOWS	9/17/2024		8	CR05	N400854261NL27	WRITE-UP
	24200-26A	P1818	BULKED CR05 WASTE	7/18/2024	7/31/2024	69	CR05	N400854200NL26	COMPLETE
C6	24236-26A	P1818	BULKED CR05 WASTE	8/23/2024	9/4/2024	33	CR05	N400854236NL26	COMPLETE
	24248-26A	P1818	BULKED CR05 WASTE	9/4/2024	9/13/2024	21	CR05	N400854248NL26	COMPLETE
	24256-26A	P1818	BULKED CR05 WASTE	9/12/2024	9/18/2024	13	CR05	N400854256NL26	COMPLETE
	24205-26A	P1818	BULKED CR05 WASTE	7/23/2024	8/6/2024	64	CR05	N400854205NL26	COMPLETE
CIA	24219-26A	P1818	BULKED CR05 WASTE	8/6/2024	8/19/2024	50	CR05	N400854219NL26	COMPLETE
	24232-26A	P1818	BULKED CR05 WASTE	8/19/2024	8/23/2024	37	CR05	N400854232NL26	COMPLETE
	24262-26A	P1818	BULKED CR05 WASTE	9/18/2024	9/23/2024	7	CR05	N400854262NL26	COMPLETE
	24138-28A	P2118	DRAGER TUBE, GAS DETECTOR (CLASSIFIED AS NONE REGULATED)	5/17/2024		131	CR05	N400854138NL28	WRITE-UP

D1	24241-26A	P1258	USED OIL (FOR RECYCLING) (HYDRAULIC OIL/LUBE OIL/MOTOR OIL)	8/28/2024		28	CR02	N400854241NL26	WRITE-UP
	24250-27A	P0318	USED OIL (REFRIGERANT COMPRESSOR)	9/6/2024		19	CR02	N400854250NL27	WRITE-UP
	24072-26A	P1654	USED ANTIFREEZE(FOR RECYCLING)	3/12/2024		197	CR04	N400854072NL26	WRITE-UP
F1	24151-27A	P1819	BULKED CR04 WASTE	5/30/2024		118	CR04	N400854151NL27	WRITE-UP
	24267-28A	P1818	BULKED CR05 WASTE	9/23/2024		2	CR05	N400854267NL28	WRITE-UP
	24207-26A	P2029	FLAMMABLE WASTE, SOLID, WASTE CODES ON 1348'S	7/25/2024		62	DO01	N400854207NL26	COMPLETE
F1	24200-27A	P2031	FLAMMABLE WASTE, PAINT, LIQUID WASTE CODES ON 1348'S	7/18/2024		69	DO01	N400854200NL27	WRITE-UP
	24263-27A	P2029	FLAMMABLE WASTE, SOLID, WASTE CODES ON 1348'S	9/19/2024		6	DO01	N400854263NL27	WRITE-UP
	24004-27A	P1852	AEROSOL RESIDUALS (LIQUID / FLAMMABLE)	1/4/2024	9/16/2024	265	DO01,DO35	N400854004NL27	COMPLETE
F2	24113-27A	P2088	NEX CONSUMER COSMETICS FOR DISPOSAL (FLAMMABLE / ACETONE)	4/22/2024	7/29/2024	156	DO01,U002	N400854113NL27	COMPLETE
	24228-26A	P1317	GASOLINE, OIL, AND WATER (BENZENE) (FLAMMABLE)	8/15/2024	8/15/2024	41	DO01,DO18	N400854228NL26	COMPLETE
	24092-27A	P1545	UNLEADED GASOLINE (FLAMMABLE/BENZENE)	4/1/2024		177	DO01,DO18	N400854092NL27	WRITE-UP
F2	24110-26A	P2000	FLAMMABLE AND NON-REG AEROSOLS, NON-FOAMING, NO ISOCYANATES, WASTE CODES ON 1348'S	4/19/2024		159	DO01	N400854110NL26	WRITE-UP
	24151-29A	P2144	FLAMMABLE WASTE, LIQUID, (ALCOHOLS) WASTE CODES ON 1348'S	1/25/2024		244	DO01	N400854151NL29	WRITE-UP
	24199-27A	P2143	FLAMMABLE WASTE, ADHESIVES, LIQUID / WASTE CODES ON 1348'S	7/11/2024		76	DO01	N400854199NL27	WRITE-UP
FLA	24207-30A	P2031A	FLAMMABLE WASTE, PAINT, LIQUID (WITH ISOCYANATES) WASTE CODES ON 1348'S	7/25/2024		62	DO01	N400854207NL30	WRITE-UP
	24211-26A	P2088	NEX CONSUMER COSMETICS FOR DISPOSAL (FLAMMABLE / ACETONE)	7/29/2024		58	DO01,U002	N400854211NL26	WRITE-UP
	24137-27A	P2026	FLAMMABLE 'U' LISTED WASTE, WASTE CODES ON 1348'S	5/16/2024		132	DO01	N400854137NL27	WRITE-UP
O1	24176-26A	P2041	VTF SPENT FORMALIN (FLAMMABLE)	6/24/2024		93	DO01	N400854176NL26	WRITE-UP
	24005-27A	P0015	SPENT AND UNSPENT OXYGEN CANDLES (OXIDIZER, SODIUM CHLORATE/BARIUM PEROXIDE)	1/5/2024	9/11/2024	264	DO01,DO05	N400854005NL27	COMPLETE
	24101-26A	P0843	WASTE SILVER NITRATE (OXIDIZER/SILVER)	4/10/2024	8/23/2024	168	DO01,DO11	N400854101NL26	COMPLETE
O1	24255-26A	P0015	SPENT AND UNSPENT OXYGEN CANDLES (OXIDIZER, SODIUM CHLORATE/BARIUM PEROXIDE)	9/11/2024	9/16/2024	14	DO01,DO05	N400854255NL26	COMPLETE
	24255-27A	P0015	SPENT AND UNSPENT OXYGEN CANDLES (OXIDIZER, SODIUM CHLORATE/BARIUM PEROXIDE)	9/11/2024	9/12/2024	14	DO01,DO05	N400854255NL27	COMPLETE
	24071-28A	P2079	BULKED HYDROGEN PEROXIDE 31% (OXIDIZER)	3/11/2024		198	DO01	N400854071NL28	WRITE-UP
O1	24128-26A	P2049	BULKED NITRIC ACID (OXIDIZER)	5/6/2024	5/6/2024	142	DO01,DO02	N400854128NL26	WRITE-UP
	24166-26A	P1990	INORGANIC SOLID OXIDIZERS	6/14/2024		103	DO01	N400854166NL26	WRITE-UP
	24234-26A	P0843	WASTE SILVER NITRATE (OXIDIZER/SILVER)	8/21/2024		35	DO01,DO11	N400854234NL26	WRITE-UP
P1	24239-27A	DTMVMX	ORON 900002 DOUBLE JUNCTION INNER FILLING SOLUTION: 900002 (OXIDIZER)	8/26/2024		30	DO01	N400854239NL27	WRITE-UP
	24256-29A	P0015	SPENT AND UNSPENT OXYGEN CANDLES (OXIDIZER, SODIUM CHLORATE/BARIUM PEROXIDE)	9/11/2024		14	DO01,DO05	N400854256NL29	WRITE-UP
	24002-26A	P2079	BULKED HYDROGEN PEROXIDE 31% (OXIDIZER)	1/2/2024		267	DO01	N400854002NL26	TEMP
P1	24257-28A	P1257	USED OIL - (FILTERS FOR RECYCLING) (HYDRAULIC OIL/LUBE OIL/MOTOR OIL/DIESEL)	9/13/2024		12	CR02	N400854257NL28	WRITE-UP
	24263-26A	P1852	AEROSOL RESIDUALS (LIQUID / FLAMMABLE)	9/19/2024		6	DO01,DO35	N400854263NL26	WRITE-UP
	24043-28A	P1041	WASTE BATTERIES, DRY (LITHIUM) (ION)	2/12/2024		226	UNIV	N400854043NL28	WRITE-UP
RL	23348-50A	P1041D	DAMAGED/DEFECTIVE LITHIUM ION BATTERY (REACTIVE)	12/14/2023	8/20/2024	286	DO03	N400853348NL01	COMPLETE
	24194-27A	P1692-575	DENTAL VACUUM SYSTEM FILTERS FOR RECYCLING (MERCURY)	7/11/2024	8/27/2024	76	DO09	N400854194NL27	COMPLETE
	24249-50A	P1199-A42	LEAD DUST DEBRIS	8/19/2024	8/19/2024	37	DO08	N400854232NL27	COMPLETE
T1	24260-26A	P2099	WEAPONS RANCH MAINTENANCE DEBRIS (LEAD)	9/5/2024	9/5/2024	20	DO08	N400854260NL50	COMPLETE
	20238-01A	P2085	NICOTINE CONTAINING PRODUCTS FOR RECYCLING	9/16/2024	9/16/2024	9	DO08	N400854260NL26	COMPLETE
	24017-26A	P1812	WASTE FLOURESCENT LAMPS (BROKEN)(MERCURY)	8/25/2020		1492	NONE	N40085-0238-JF01	WRITE-UP
T2	24024-26A	P1117	WASTE THERMOSTATS AND THERMOMETERS (HIGH MERCURY)	1/17/2024		252	DO09,	N400854017NL26	WRITE-UP
	24026-27A	P2097	EPINEPHRINE CONTAINING WASTE	1/25/2024		244	PO42	N400854026NL27	WRITE-UP
	24170-27A	P2022	P CODED PHARMACEUTICALS, DEBRIS AND CONTAINERS	6/17/2024		100	PO01,PO75	N400854170NL27	WRITE-UP
T3	24206-26A	P1889	TOXIC HAZARDOUS WASTE (WASTE CODES ON 1348'S)	7/24/2024		63	DO04	N400854206NL26	WRITE-UP
	24240-26A	P1692-575	DENTAL VACUUM SYSTEM FILTERS FOR RECYCLING (MERCURY)	8/27/2024		29	DO09	N400854240NL26	WRITE-UP
	24136-26A	PO385	WASTE LAMPS (FLUORESCENT)	5/13/2024		135	UNIV	N400854136NL26	WRITE-UP
T3	24085-26A	PO956A	SHT TILES (LEAD)	3/25/2024	3/25/2024	184	DO08	N400854085NL26	COMPLETE
	24257-27A	PO956A	SHT TILES (LEAD)	9/13/2024		12	DO08	N400854257NL27	WRITE-UP

TL	24178-26A	P0847	MERCURIC NITRATE DEBRIS (NO HIGH MERCURY)	6/26/2024		91	D009	N400854178NL26	WRITE-UP
	24199-26A	P1060A-575	DENTAL AMALGAM FOR RECYCLING (MERCURY)	7/11/2024		76	D009	N400854199NL26	WRITE-UP
	23338-27A	P0942	WASTE ALKALINE BATTERIES, DRY (MANGANESE DIOXIDE)	12/4/2023	8/13/2024	296	UNIV	N400853338NL27	COMPLETE
	24142-26A	P0385	WASTE LAMPS (FLUORESCENT)	1/24/2024		245	UNIV	N400854142NL26	TEMP
UW	24022-27A	P1182	WASTE BATTERIES, DRY (NICKEL METAL HYDRIDE)	1/22/2024		247	UNIV	N400854022NL27	WRITE-UP
	24192-26A	P0588	WASTE BATTERIES, DRY (NICAD)	7/10/2024		77	UNIV	N400854192NL26	WRITE-UP
	24247-26A	P0942	WASTE ALKALINE BATTERIES, DRY (MANGANESE DIOXIDE)	9/3/2024		22	UNIV	N400854247NL26	WRITE-UP