

RCRA Inspection Report

1) Inspector and Author of Report

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2) Facility Information

USAF Tyndall AFB
233 Florida Avenue
Tyndall AFB, Florida 32403
EPA ID Number: FL1570024124

County: Bay
Latitude: 30.073587
Longitude: -85.591595
Primary NAICS - 928110 – National Security
SIC Code: 9711 – National Security

3) Responsible Official

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Environmental Element
USAF Tyndall AFB
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4) Inspection Participants

Jose Cintron, Chief of Environmental Element, USAF Tyndall AFB
Ted Broome, Hazardous Waste Facility Site Manager, USAF Tyndall AFB
Robert Devecchio, Environmental Technician, USAF Tyndall AFB
Anna List, Florida Department of Environmental Protection
Morgan Tomas, Florida Department of Environmental Protection
Ethan F. Salley, Florida Department of Environmental Protection
Stephanie Kindos, Florida Department of Environmental Protection
Parvez Mallick, U. S. Environmental Protection Agency, Region 4

5) **Date of Inspection**

July 11, 2023, 9 a.m.

6) **Applicable Regulations¹**

Resource Conservation and Recovery Act (RCRA) Sections 3002 (42 U.S. Code – Annotated U.S.C.A. §§ 6925 and 6927), Chapter 403 of the Florida Statutes, Fla. Stat. § 403.702 *et seq.*, and rules 62.710.210 -.901, and 62-730 *et seq.* of the Florida Administrative Code Annotated (Fla. Admin. Code Ann.) [40 Code of Federal Regulation (C.F.R.) Parts 260 - 270, 273, 278, & 279].

Pursuant to Florida Administrative Code Annotated (F.A.C.) Chapter 62-730.160(1), [40 C.F.R. § 262.15(a)], a generator may accumulate as much as 55 gallons of non-acute hazardous waste in containers at or near the point of generation where wastes initially accumulate, which is under the control of the operator of the process generating the waste, without a permit or without having interim status, as required by Chapter 403 of the Florida Statutes, Fla. Stat. § 403.702 *et seq.*, [Section 3005 of RCRA, 42 U.S.C. § 6925], and without complying with F.A.C. Chapter 62-730.160(1), [40 C.F.R. § 262.16(b) or § 262.17 (a)], except as required in F.A.C. Chapter 62-730.160(1), [40 C.F.R. § 262.15(a)(7) and (8)], provided that the generator complies with the satellite accumulation area (SAA) conditions listed in F.A.C. Chapter 62-730.160(1), [40 C.F.R. § 262.15(a)] (hereinafter referred to as the “SAA Permit Exemption”).

Pursuant to Florida Administrative Code (F.A.C.) Chapter 62-730.160(1) [40 C.F.R. § 262.17], a generator of 1,000 kilograms or greater of hazardous waste in a calendar month is a large quantity generator (LQG) and may accumulate hazardous waste on-site for 90 days or less without a permit or without having interim status, as required by Chapter 403 of the Florida Statutes, Fla. Stat. § 403.702 *et seq.*, [Section 3005 of RCRA, 42 U.S.C. § 6925], provided that the generator complies with the conditions listed in F.A.C. Chapter 62-730.160(1) [40 C.F.R. § 262.17] (hereinafter referred to as the “LQG Permit Exemption”).

7) **Purpose of Inspection**

The purpose of this inspection was for the U.S. Environmental Protection Agency, Region 4, and the Florida Department of Environmental Protection to conduct a joint unannounced compliance evaluation inspection (CEI) at USAF Tyndall AFB, (hereinafter, “Tyndall” or the “facility”) to determine compliance with the applicable requirements of the Resource Conservation and Recovery Act (RCRA) and the corresponding Florida Department of Environmental Protection (FDEP) regulations. This was an EPA lead inspection.

8) **Facility Description**

The USAF Tyndall AFB (“Tyndall AFB” or “the facility”) is home to the 325th Airlift Wing, which is comprised of the 325th Operations Group, the 325th Maintenance Group, the 325th Mission Support Group, and the 325th Medical Group. This base is also home to the 43rd Fighter

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.

Squadron, the 325th Aircraft Maintenance Squadron, and multiple tenant units. The 325th Civil Engineering Squadron manages the environmental program at USAF Tyndall AFB.

The USAF Tyndall AFB base is located on approximately 29,000 acres on the south-central portion of the Florida panhandle just east of Panama City, Florida, on an 18-mile-long peninsula. Approximately 4,500 civil and military personnel are employed at Tyndall AFB. Tyndall AFB was initially activated in 1941 as an Army Corps of Engineers facility. It was re-designated as an Air Force Base in 1947. Tyndall serves as the Air Education and Training Center and is used to train air defense crews and to test new weapons systems for air defense tactics.

Prior to October 2018, Hurricane Michael, on the North-side of Hwy 98, there were airfield support units including the aircraft hangars, maintenance, runways, and aircraft. The South-side of Hwy 98 had active-duty support buildings including housing, a medical clinic and pharmacy, laboratory facilities, fitness center, and general stores. In October 2018, Hurricane Michael caused significant damages to the base. According to the Tyndall AFB staff, approximately 300 buildings have been demolished since Hurricane Michael. Construction is underway to revitalize and modernize Tyndall AFB and currently some facilities on base are in temporary trailers until construction is finished. There are currently around 140 new buildings. Tyndall AFB is planning to complete the reconstruction by 2027. Currently, most of the maintenance done on base is to F-16's (full and small-scale drones) and F-22's. Tyndall AFB have fewer active-duty military personnel than in 2018 but expected to grow larger in the future.

Tyndall AFB submitted a RCRA Subtitle C Site Identification Form, 8700-12FL, to the FDEP on March 1, 1990, as a large quantity generator (LQG) of D001-D003, D005-D008, D011, D018, D022, D023, D035, F001-F003, F005, U154, U159, and U248 waste and a large quantity handler of universal waste (LQHUW), with multiple subsequent notifications to FDEP. Tyndall AFB's most recent Form 8700-12FL submittal to the FDEP was on March 25, 2022, as a LQG of hazardous waste and a LQHUW. The facility notified Dan L. Surber, Hazardous Waste Manager, as the site contact.

9) Previous Inspection History

Tyndall AFB was inspected by the EPA, Region 4 and FDEP on December 11, 2017, to determine the facility's compliance with state and federal RCRA regulations. The inspectors observed the facility did not conduct a waste determination on solid waste, did not keep containers of hazardous waste closed, and did not have adequate aisle space to inspect hazardous waste containers. The FDEP's follow-up inspection on February 20, 2018, found no violations at the facility.

10) Opening Conference

On July 11, 2023, the EPA inspector Parvez Mallick, accompanied by FDEP inspectors Anna List, Morgan Tomas, Ethan F. Salley, and Stephanie Kindos, arrived at the facility at approximately 9:00 a.m. The inspectors were received by Jose Cintron, Chief of Environmental Element, USAF Tyndall AFB. The inspectors explained the visit as an unannounced RCRA compliance evaluation inspection (CEI). The inspectors were escorted by Jose Cintron to a conference room and were joined by Ted Broome for an opening conference. The inspectors introduced themselves, showed their credentials and explained the purpose of the visit.

The inspectors described the anticipated use of a digital camera during the inspection and provided a written list of the records needed for review. 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 provided to the EPA. Tyndall did not assert a business confidentiality claim.

Tyndall 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 Jose Cintron, Ted Broome, and Robert Devecchio (Tyndall representatives) escorted the inspectors on a tour of the air force base operations.

Tyndall AFB personnel stated that hazardous and universal wastes are generated in multiple areas throughout the base and that the base has designated initial accumulation points (IAPs or satellite accumulation areas) and one less than 90-day hazardous waste storage area (Central Accumulation Area).

11) Inspection Observations

Following the opening conference, the inspection team proceeded with the inspection. The inspectors inspected the following areas during the onsite inspection: Building 6011 – Central Accumulation Area, Used Oil Area, Building 280 – Coating and Painting, CEMIRT Building, and Hospital Building. Below is a description of the observations made during the inspection. *Unless noted otherwise, for the walkthrough inspection:*

- *All satellite accumulation area (SAA) containers were observed to be closed and marked with an indication of the hazards of the contents, and "Hazardous Waste."*
- *All containers of hazardous waste observed in 90-day accumulation areas were closed, marked with the words "Hazardous Waste," an indication of hazards of the contents, and accumulation start dates.*
- *All universal waste containers were observed to be closed, marked with a description of the universal waste being handled, the words "Universal Waste," and accumulation start dates.*
- *All containers of used oil were marked "Used Oil."*

Building 6011 – Central Accumulation Area (CAA)

Building 6011 stores hazardous and non-hazardous waste containers generated around the base including e-waste and universal waste. Inside the building, the inspectors observed a bulb crusher. The facility representative indicated that crushed bulbs waste determination is conducted every year. The inspectors observed an aerosol puncture device fitted in a 55-gallon container. A waste determination of aerosol liquid is conducted before sending it off for disposal. The inspectors indicated that both containers should be marked "Hazardous Waste" until waste determination has been completed.

There was a 55-gallon container of used oil in the Building 6011.

There was a container labeled “on hold waste” which was waste/material found on base that was pending a waste determination. The inspectors suggested that the facility mark the container as “Hazardous Waste” until a waste determination has been completed. The inspectors observed one eyewash station in the main portion of the building by the office area.

Central Accumulation Area containers are stored in Secureall 14’ X 8’ X 8’ hazardous waste/material storage lockers located outside the Building 6011. This area was secured, fenced, and connected to Building 6011 (Photos #1-4). Within the outside area, the storage locker #2 was storing the following flammable wastes:

- One 55-gallon container of waste paint related materials (EPA waste code D001, D007, D035, and F005);
- One 55-gallon container of parts washer and sludge (EPA waste code D001 and D008);
- One 5-gallon container of waste flammable (toluene), EPA Waste Code (D001 and D018);
- One 5-gallon container of HPLC effluent (acetonitrile and methanol), EPA Waste Code (D001 and F003); and
- One 30-gallon container of waste MTB Butter GF-RYGG-025 (Part A), EPA Waste Code D001.

Within the outside area, the storage locker to the left of Locker #2 was Locker #5, containing heavy metal and toxic wastes:

- One 30-gallon container labeled “UN3480 waste lithium-ion batteries”
- Ten 55-gallon containers of paint debris from LO/CRF (EPA Waste Code D007);
- One 55-gallon container of wipe cloths and paint solvent rags from LO operations (EPA Waste Code D001, D035, and F005).

Within the outside storage area, the storage Locker #6, marked as corrosive:

- One 35-gallon container of spilled or exposed lead acid batteries (EPA Waste Code D002 and D008); and
- Twenty-four 55-gallon containers of waste corrosive liquid (EPA Waste Code D002).

Used Oil Area

Used oil for recycling and product fuels are stored in a fenced in area located north of the base runway. Product fuels arrive via tanker barges and are piped directly into two 8,000-gallon above ground storage tanks (AST’s). Within a separate cement berm were two additional 8,000-gallon AST’s for used oil storage (Photo #5). The 8,000-gallon used oil tanks were marked with the words “Used Oil.” Only one of these AST’s was being used at the time of the inspection for storage of used oil. The secondary containment of used oil is sufficient, but the inspectors observed vegetation growth in the secondary containment area through the cracked concrete. The inspectors recommended repairing the cracks and resealing of the secondary containment area. On July 21, 2023, Tyndall provided photograph to EPA and FDEP showing that containment area has been repaired and sealed with an impermeable coating. In addition, Tyndall provided tank manufacturer documentation indicating that the used oil tank is double walled.

Aircraft are defueled at the flight line with fuel bowzers that are subsequently transported in this area and emptied into the AST. There was an eyewash station located in this area. Tyndall

contracts Aaron Oil, Inc. of Mobile, Alabama (ALD983180233) and Oil Recovery Inc. of Camilla, Georgia (GAR000054460) to transport their used oil. No issues or concerns were noted in this area.

Building 280 – F22 Coating and Painting

In Building 280 is used for F-22s painting and coating operations. The inspectors observed two separate SAAs in this building. The first SAA was located to the right of the entrance and stored the following waste containers (Photo #6):

- One 5-gallon waste Alodine rags (EPA waste code D007);
- 55-gallon container of PPE paint debris (EPA waste code D007, D011, and D035);
- One 5-gallon container of paint pens (EPA Waste Code D001 and F003);
- One 55-gallon container of non-hazardous residual sealant debris;
- One 55-gallon container of waste paint related materials from F-22 coating operation (EPA Waste Code D001, D007, D035, and F005);
- One 55-gallon container of paint solvent rags (EPA Waste Code D035 and F005);
- One 55-gallon container of silver waste for precious metal recovery (EPA Waste Code D011);
- One 55-gallon container of metal cans for recycling; and
- One 55-gallon container of non-hazardous POL Pads (Jet A, oil, hydraulic fluid, etc.).

The second SAA in Building 280 stored the following containers:

- One 5-gallon waste Alodine rags (EPA waste code D007);
- 55-gallon container of PPE paint debris (EPA waste code D007, D011, and D035);
- One 5-gallon container of paint pens (EPA Waste Code D001 and F003);
- One 55-gallon container of non-hazardous residual sealant debris;
- One 55-gallon container of waste paint related materials from F-22 coating operation (EPA Waste Code D001, D007, D035, and F005);
- One 55-gallon container of paint solvent rags (EPA Waste Code D035 and F005);
- One 55-gallon container of silver waste for precious metal recovery (EPA Waste Code D011); and
- One 55-gallon container of non-hazardous POL PADS (Jet A, oil, hydraulic fluid, etc.).

Building 1117 – Research Lab

The inspectors met with Kurby Pyka, Hazardous Waste Manager, of Building 1117, who led the inspectors to the SAA in the building. According to the Tyndall representative, various on-going research are conducted in this building.

Room 145:

- One 5-gallon container of high-performance liquid chromatography (HPLC) effluent (acetonitrile and methanol), EPA Waste Code (D001 and F003).

Room 146:

- One 5-gallon container of corrosive heavy metals (EPA Waste Code D002, D007, and D008); and
- One 5-gallon container of flammable trace solvents/heavy metals (D001, D007, and F003).

Room 158

- One 2.5-gallon container of halogenated sample vials (EPA Waste Code F002);
- One 5-gallon container of base bath solution (EPA Waste Code D002); and

- One 5-gallon container of firefighting foam, perfluorooctane sulfonic (PFOS) waste. The manifests indicated that PFOS waste is managed as non-hazardous and sent it to Chemical Waste Management, Inc. in Emelle, Alabama.

Room 161

- One 5-gallon container of mixture of chloroform with ethyl alcohol (EPA Waste Code D022 and U044).

Room 161

- One 5-gallon container of mixture of chloroform with ethyl alcohol (EPA Waste Code D022 and U044).

Room 136 - Storage for sampling and testing

- One closed 5-ft long cardboard box contained spent mercury fluorescent lamps – Universal Waste dated 5/17/23; and
- One 5-gallon container Universal Waste batteries dated 5/17/23.

Room 130 - contained fire pit water for testing/research. No hazardous waste observed in this room.

Room 114

- One 5-gallon container of base bath solution (EPA Waste Code D002).

Room 121/116 (two rooms linked together)

- One 5-gallon container of corrosive liquids silica (EPA Waste Code D002);
- One 5-gallon container of waste sulfuric acid with metal (EPA Waste Code D002, D007, and D009); and
- One 5-gallon container of flammable solvent (EPA Waste Code D001).

Outside Storage Area:

- One 5-gallon container of used antifreeze;
- One 55-gallon container of non-hazardous RD-10 firefighting foam solution; and
- One closed 15-gallon container of used oil with secondary containment.

Civil Engineer Maintenance Inspection and Repair Team (CEMIRT) Building

CEMIRT building is used for maintenance and rebuilding of aircraft arresting systems (AAS). AAS is designed to safely stop an aircraft in the event of an emergency or at airfields where conditions are not present for conventional landings. The following containers were observed during the inspection:

- One 30-gallon container of hazardous waste aerosols cans.
- One 55-gallon container of non-hazardous POL PADS (Jet A, oil, hydraulic fluid, etc.); and
- One 600-gallon double walled container of used oil.

Hospital Building

The inspectors met with Michael Palase, Facility Manager, who led the inspectors in building. He stated that Trilogy picks up medical waste every two weeks. The hospital is the only pharmacy now on the base.

The following SAA wastes were observed in the pharmacy (Photo #7):

- One 2.5-gallon container of expired self-life ignitable liquids (EPA Waste Code D002);
- One 2.5-gallon container of corrosive acidic waste (EPA Waste Code D002);
- One 2.5-gallon container of corrosive basic waste (EPA Waste Code D002);
- One 2.5-gallon container of waste coumadin - toxic (EPA Waste Code P001 and U248); and

- One 5-gallon container of used dental amalgam packs (EPA Waste Code D009).

Tyndall uses a reverse distributor for pharmacy's unwanted, unusable, or outdated pharmaceuticals to the manufacturer or to another entity that can legitimately reuse the medicine. Under the reverse distribution program, an expired product that is unopened can be returned for a reverse credit. On July 21, 2023, Tyndall provided documentation showing pharmaceutical returns and credits for the last three years.

The inspectors informed Tyndall representatives that in order for a reverse distributor to comply with RCRA regulations, the pharmacy must ship unwanted, unusable, or outdated pharmaceuticals product to a reverse distributor for legitimate reuse or credit who in turn chooses to dispose of it. The pharmacy cannot dispose of its pharmaceuticals or its other waste at a reverse distributor. If the pharmacy decides to discard a pharmaceutical, or it is clearly a waste, it cannot be sent for reverse distribution, and the pharmacy is required to make a hazardous waste determination and dispose of it in accordance with applicable RCRA Subpart P regulation.

There was a universal waste storage room on the outside of the building. The inspector observed the following universal waste containers:

- One closed 5-ft long cardboard box of universal waste lamps dated 3/31/23; and
- One 35-gallon container of universal waste aerosol cans dated 3/31/23.

Records Review

The records reviewed included hazardous waste manifests/associated land disposal restriction (LDR) records, used oil records, waste profiles, universal waste manifests, weekly inspection logs, contingency plan, quick response guide, waste minimization plan, personnel training documents, biennial report, and job descriptions.

According to reviewed manifests, Safeway Industrial (EPA ID AIR000053272), Safety-Kleen Systems Inc. (EPA ID TXR000081205), and Action Resources (EPA ID ALR000007237) were the registered transporters in 2020-2023. The designated treatment, storage and disposal facilities were Clean Earth of Calvert City (EPA ID KYD985073196), Clean Harbors of El Dorado (EPA ID MAD039322250), and Liquid Environmental Solutions (EPA ID ALD000859421). The 2022 Biennial Report, for waste generated in 2021, was sent to FDEP on March 25, 2022.

Weekly inspections records were reviewed for last three years and appeared timely and accurate, with all required information present. The 2022 Biennial Report, for waste generated in 2021, was sent to FDEP on March 25, 2022.

12) Closing Conference

The inspectors conducted a closing conference with Tyndall representatives. The inspectors stated their preliminary conclusions of the inspection. Tyndall provided photos and documents of corrective actions taken at the facility on July 21, 2023. Based on the information provided during and following the inspection, the Tyndall has returned to compliance.

16) **Signed**

PARVEZ MALLICK

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MALLICK

Date: 2023.09.18 15:34:09 -04'00'

Parvez Mallick
Environmental Engineer

Date

17) **Concurrence**

ARACELI CHAVEZ

Digitally signed by ARACELI
CHAVEZ

Date: 2023.09.18 15:54:26 -04'00'

Araceli B. Chavez
Chief
RCRA Enforcement Section

Date

USAF Tyndall AFB
FL1570024124
RCRA CEI Photographs
Photographs by Morgan Tomas, Florida Department of Environmental Protection



Photo #1 – CAA hazardous waste storage area.



Photo #2 - CAA hazardous waste storage area.



Photo #3 - CAA hazardous waste storage area.



Photo #4 - CAA hazardous waste storage area.



Photo #5 – 8,000 gallon used oil tank.



Photo #6 - Building 280 satellite accumulation area.



Photo #7 – Pharmacy satellite accumulation area.

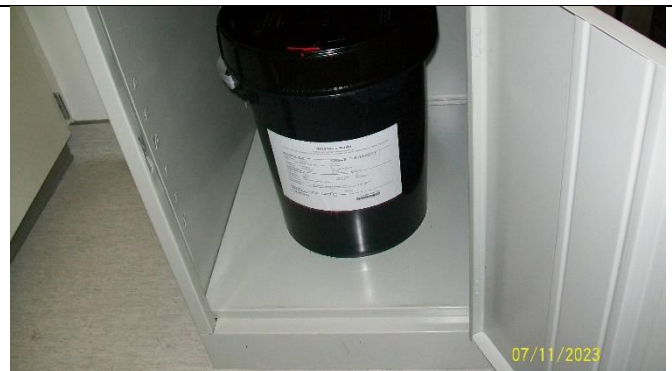


Photo #8 - Pharmacy satellite accumulation area.