

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

Mississippi Air National Guard (MS ANG) Combat Readiness Training Center (CRTC)
4715 Hewes Avenue
Gulfport, Mississippi 39501
EPA ID No.: MS6570090013

3) Responsible Officials

Captain Thomas Brewer
MS ANG CRTC

4) Inspection Participants

Koray “Noah” Akozbek, MS ANG CRTC
Sidney Collins, MS ANG CRTC
Brad Justice, 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 CRTC located at 4715 Hewes Avenue, Gulfport, Mississippi, Harrison County, serves as a Combat Readiness Training Center. The facility provides housing to approximately 200-250 personnel coming from various parts of the Air National Guard Units from across the State for various arms training exercises.

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 CRTC 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 recordkeeping.

After the inspection at the MS ANG CRTC Small Arms Range Facility was conducted, we returned to the MS ANG CRTC Base for a closing conference for the inspection concluded at MS ANG Small Arms Range facility and during the discussion it was determined that the Base was also registered as a small quantity generator of hazardous waste. However, the Base had no prior RCRA compliance evaluation inspection (CEI) by the EPA and the State. EPA and the State Inspectors, since they were already at the Base, made a joint decision to conduct a RCRA CEI inspection at the Base. As part of the inspection, we discussed the scope of the inspection for the Base 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 recordkeeping. Mr. Akozbek and Mr. Collins provided the inspectors the MS ANG CRTC

facility's history and current operation onsite. The inspectors were later accompanied by Mr. Akozbek during the site visit.

11) **Findings**

The inspectors observed two small separate locked metal fabricated sheds located behind the Grounds Shop near Building 130. Mr. Akozbek mentioned that both the sheds were used as satellite accumulation areas (SAA) for universal waste and RCRA hazardous waste.

Universal Waste

The inspectors observed a white color metal fabricated shed with rust on the bottom part of the door locked at the time of inspection. The door had a hazard placard as "Dangerous" and a sign indicating "Universal Waste Bulbs" and emergency contact information on the door (Photo-1). The inspectors observed three 4-foot boxes and one 8-foot box containing spent fluorescent lamps. One 4-foot box and one 8-foot box containing spent fluorescent lamps were observed to be open and two 4-foot boxes and one 8-foot box were observed to be undated at the time of inspection (Photo-2 and 3).

Pursuant to 11 Miss. Admin. Code Pt. 3, R. 1.21 [40 C.F.R. § 273.15(a) and (c)], a SQHUW may accumulate universal waste no longer than one year and must be able to demonstrate the length of time that the universal waste has accumulated from the date that it became a waste or was received.

Pursuant 11 Miss. Admin. Code Pt. 3, R. 1.21 [40 C.F.R. § 273.13(d)], a SQHUW must manage universal waste lamps in a way that prevents releases of any universal waste or component of a universal waste to the environment

An email with photos was sent on November 18, 2021, documenting the corrective action taken for closure and dating the boxes containing the spent fluorescent lamps at the storage shed (Photo-4).

Corrosive Waste (D002)

The inspectors observed SAA comprising of a white color metal fabricated shed with rust on the top and bottom part of the door locked at the time of inspection. The door had a hazard placard as "Dangerous" and "Corrosive". The inspectors observed a sign indicating that the shed was used for storing spent batteries and hazardous waste (Photo-5). The inspectors observed two unlabeled wooden boxes stored on pallets containing non-hazardous alkaline batteries (Photo-6). The inspectors also observed three 1-gallon containers with hazard indication as "Corrosive". The trade name on the container was marked as "CHEMPRIME", rust inhibitor (Photo-7). The containers were observed to be closed and unlabeled as "Hazardous Waste". There were no leaks and spills observed near the containers.

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 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 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(a)] (hereinafter referred to as the “SAA Permit Exemption”).

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

Maintenance Shop

The inspectors observed a 500-gallon double walled tank inside a secondary containment located outside the maintenance shop. The closed tank had a faded “Used Oil” label on it (Photo-8). The inspectors recommended a clear and visible label on the tank. An email with a photo of the used oil storage tank marked with a visible label was sent on November 18, 2021, (Photo-9). There were no leaks and spills observed in the secondary containment.

AG Shop-Building 75

The Aerospace Ground Shop provides maintenance and servicing support for various aircraft equipment. There is no painting activity conducted on site. The inspectors observed a Smart Washer, SW-23 Model, Parts/Brake equipment (Photo-10). The equipment was not in service at the time of inspection. The equipment used a biodegradable solution for parts washing. The cleaning fluid was determined to be nonhazardous. In the same area, the inspectors observed an unlabeled parts washer in the service area (Photo-11). The equipment was not in use at the time of inspection. The maintenance personnel stated that the facility had a contract with Safety-Kleen Systems Inc. for servicing the parts washer equipment. The equipment was later labeled before the end of the inspection.

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

The inspectors also observed five 5-gallon containers in secondary containment in corner of the maintenance shop (Photo-12). The containers were observed to be closed and labeled as “New Engine Oil”; “New Turbine Oil”; “Used Antifreeze”; and “Used Oil”. The containers containing “New Engine Oil” and the “New Turbine Oil” were connected to a hand operated pumps connected to separate hoses.

Central Accumulation Point Building

The Central Accumulation Point storage is a separate building with a sign at the entrance indicating the building use and emergency contact information (Picture-13). The storage area was equipped with fire protection equipment. The waste streams stored in the storage included corrosives, universal waste, and nonregulated waste. The inspectors observed one 55-gallon drum labeled as “Nonhazardous Waste” and one empty 30-gallon container. In addition, the inspectors observed three unlabeled and undated 5-gallon buckets containing spent batteries. One of the 5-gallon bucket containing spent batteries had a corrosive label on it (Picture-14).

Pursuant to 11 Miss. Admin. Code Pt. 3, R. 1.3 [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).”

Pursuant to 11 Miss. Admin. Code Pt. 3, R. 1.3 [40 C.F.R. § 273.15(a) and (c)], a SQHUW may accumulate universal waste no longer than one year and must be able to demonstrate the length of time that the universal waste has accumulated from the date that it became a waste or was received.

An email was later sent indicating that all the buckets containing spent batteries were labeled, dated, and moved to the universal waste storage shed. The inspectors observed bright reddish colored fluid on the grated floor of the storage building. Mr. Akozbek suspected the liquid to be antifreeze fluid. He said that he was in the process of making a waste determination prior to disposing of the unknown liquid (Photo-15). The inspectors requested Mr. Akozbek to provide a copy of the manifest and/or a bill of lading for the unknown liquid for disposal.

Pursuant to 11 Miss. Admin. Code Pt. 3, R. 1.3 [40 C.F.R. § 262.16)], SQG may accumulate hazardous waste on-site for 180 days or less without a permit or without having interim status, as required by 11 Miss. Admin. Code Pt. 3, R. 1.3 [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. § 262.16] (hereinafter referred to as the “SQG Permit Exemption”).

Pursuant to 11 Miss. Admin. Code Pt. 3, R. 1.3 [40 C.F.R. § 262.11], a person who generates a solid waste, as defined in 11 Miss. Admin. Code Pt. 3, R. 1.3 [40 C.F.R. § 261.2], must make an accurate determination as to whether that waste is a hazardous waste in order to ensure wastes are properly managed according to applicable RCRA regulations articulated in 11 Miss. Admin. Code Pt. 3, R. 1.3 [40 C.F.R. § 262.11].

Pursuant to 11 Miss. Admin. Code Pt. 3, R. 1.3 [40 C.F.R. § 262.16(b)(8)(i)], which is a condition of the SQG Permit Exemption, a generator is required to maintain and operate its facility to minimize the possibility of a fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water which could threaten human health or the environment.

Record Review

According to Mr. Akozbek, a weekly site inspection is conducted at the Central Accumulation Point Storage for observing the integrity of the containers as well as for leaks and spills however, no records are maintained for the weekly inspection.

Pursuant to 11 Miss. Admin. Code Pt. 3, R. 1.3 [40 C.F.R. § 262.16(b)(2)(iv)], which is a condition of the SQG Permit Exemption, a generator is required to, at least weekly, inspect central accumulation areas looking for leaking containers and for deterioration of containers caused by corrosion or other factors.¹

Mr. Akozbek mentioned that he is in the process of developing and maintaining a weekly inspection log for the hazardous waste storage unit. The facility maintains a CRTC Hazardous Waste Management Plan dated November 2018 on site. According to Mr. Akozbek, the facility has arrangements with the onsite fire department to serve as the primary emergency responder to all incidents, spills or emergencies reported within the Base.

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. 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. After the discussion, the inspection was concluded.

12) Signed

RAJAGOPAL AIYAR Digitally signed by RAJAGOPAL AIYAR
Date: 2022.01.25 13:18:05 -05'00'

Raj Aiyar
Environmental Engineer

Date

Concurrence

ARACELI CHAVEZ Digitally signed by ARACELI CHAVEZ
Date: 2022.01.25 13:40:18 -05'00'

Araceli B. Chavez
Chief
RCRA Enforcement Section

Date

ATTACHMENT A

MS ANG CRTC

Gulfport, Mississippi

COMPLIANCE EVALUATION Inspection

MS6570090013

November 17, 2021

Photos taken by Raj Aiyar, MDEQ



Photo-1 Universal Waste Shed



Photo-5 Spent Batteries and Corrosive Waste Shed



Photo-2 Open and Undated Universal Waste Lamps



Photo-6 Nonhazardous Spent Batteries Boxes



Photo-3 Open Universal Waste Lamps



Photo-7 Unlabeled Corrosive (D002) Waste



Photo-4 Closed, labelled and Dated Universal Waste Lamps



Photo-8 Used Oil Tank (Faded Label)



Photo-9 Used Oil Tank with a visible label



Photo-10 Nonhazardous Parts Washer Unit



Photo-13 Central Accumulation Point Storage Unit



Photo-11 Unlabeled Safety-Kleen Parts Washer Unit



Photo-14 Spent Batteries with hazard indication



Photo-12 Used Oil and Product Containers



Photo-15 Unknown liquid spill in the secondary containment of Central Accumulation Point Storage Unit