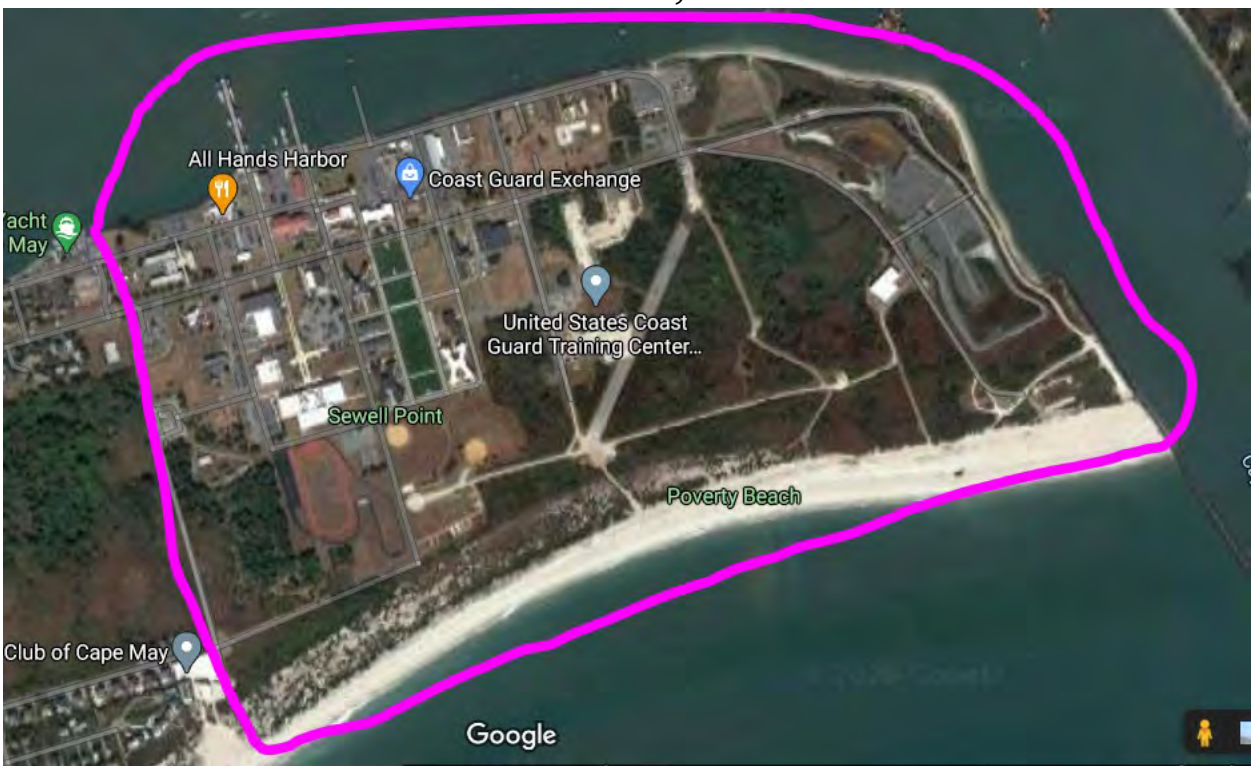
Off-Site Compliance Monitoring Activity Report
U.S. Coast Guard – Cape May
October 29, 2020



Written by:

X

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Enforcement Officer
ECAD-CAPSB-CAS USEPA R2

Approved by:

X KATHLEEN MALONE-BOGUSKY

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Chief - Compliance Assurance Section
ECAD-CAPSB-CAS USEPA R2

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OFF-SITE COMPLIANCE MONITORING ACTIVITY REPORT

U.S. Environmental Protection Agency, Region 2
Enforcement and Compliance Assurance Division
290 Broadway, 21st floor
New York, New York 10007-1866

Facility Name: U.S. Coast Guard Training Center Cape May

Facility Address: 1 Munro Avenue, Cape May, NJ 08204

Latitude & Longitude: 38.94803, - 74.88261

Potential EJ Concerns: No (See Appendix B: EJ SCREEN)

Potential Flood-Prone Area: No (See Appendix C: FEMA Flood Map)

Sole Source Aquifer: Yes (See Appendix D: Sole Source Aquifer Map)

Federal Facility: Yes

ICIS & other Program ID Codes: RCRA ID#: NJ4690308933; FRS ID: 110000801419

NAICS Codes: 926120 – Regulation and Administration of Transportation Programs

Date of Off-Site Monitoring: October 29, 2020

Inspector(s): Jim Sullivan

Facility Representative(s):

Name	Title	Phone	Email
Matt Norman	Safety and Occupational Health Coordinator	609-898-6232	Matthew.L.Norman@uscg.mil
Michael Mulvaney	Environmental Protection & Safety Section	609-898-6889	Michael.T.Mulvaney@uscg.mil

Corrections/Updates for EPA Databases: The facility is listed as a large quantity generator of hazardous waste in EPA's RCRA-Info database, but a review of past manifests shows the facility is currently a very small quantity generator (see Section 3 below).

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1. INTRODUCTION

The Region 2 office of the Environmental Protection Agency (EPA) conducted an Off-Site Compliance Monitoring (OfCM) Activity pertaining to U.S. Coast Guard Training Center Cape May on October 29, 2020. Ordinarily an on-site inspection is conducted, however, due to health and safety concerns involving COVID-19, this OfCM Activity was substituted. The purpose of this OfCM Activity was to evaluate the facility's compliance with the Resource Conservation and Recovery Act (RCRA) requirements for hazardous waste management.

Per the Coast Guard website, U.S. Coast Guard Training Center Cape May, called TRACEN–Cape May by the Coast Guard, is the 5th largest base in the Coast Guard and the sole accession point for the entire enlisted workforce. TRACEN-Cape May's mission is to develop the enlisted workforce for the U.S. Coast Guard, while providing superior mission support to their tenant commands. Their primary mission is seen as having four parts:

1. Deliver dynamic training that sets the foundation for their professional culture and develops job ready skills to build their workforce for generations to come;
2. Proactively maintain their current facilities and create a culture of sustainability to strategically modernize and update facilities to meet their evolving workforce needs;
3. Provide timely customer centered services that are transparent, compliant and tied to operational requirements; and
4. Make Cape May County feel like the Coast Guard's hometown.

On Friday, October 23, 2020, I emailed TRACEN-Cape May's Public Affairs Officer to schedule this OfCM Activity. On October 26th, Mr. Matt Norman replied that he manages the hazardous waste at the facility and would be the lead person assisting me.

2. FACILITY TOUR

A facility tour was not taken. This was a desktop audit conducted via phone and email.

None of the photos below contain Proprietary/Confidential Business Information or National Security issues.

3. RECORD REVIEW

At my request, Mr. Norman emailed copies of the signed treatment, storage and disposal facility (TSDF) copy for each hazardous waste manifest originating from TRACEN-Cape May over the last 3-years. I reviewed the manifests and determined that waste is being generated at the rate of a Conditionally-Exempt Small Quantity Generator, now called a Very Small Quantity Generator (VSQG), that is, less than 100-kilograms of hazardous waste per month. The RCRAInfo database has TRACEN-Cape May listed as a Large Quantity Generator (i.e., >1,000-kg per month) per their notification to EPA.

TRACEN-Cape May ships its hazardous and non-hazardous waste to Tradebe Treatment & Recycling of East Chicago, Indiana. The hazardous wastes are waste oil-based paint (D001/D007/D008/D035), broken lamps (D009/D011), waste commercial cleaning products (D002), sand blast grit (D006/D007/D008) and spent aerosol cans (D001/F005). The nonhazardous are Universal Wastes (lamps, batteries, mercury-containing thermostats), oily rags, crushed oil filters and latex paint. Used oil is sent to a local recycler, Monarch Environmental of Woodstown, NJ.

On October 26, I emailed Mr. Norman that as a VSQG, TRACEN-Cape May is exempt from most hazardous waste regulations if they:

- Continue to identify all their hazardous waste;
- Never accumulate more than 1,000-kg of nonacute hazardous waste, no more than 100-kg of acute spill cleanup residue, and no more than 1-kg of other acute hazardous waste onsite at any time; and
- Continue to ensure that the hazardous waste they produce is sent to an offsite treatment, storage, recycling, or disposal facility capable and permitted to handle such waste.

I also requested photographs of the area(s) where hazardous waste, used oil or universal waste are accumulated. On October 27th, Mr. Norman provided photos of the Universal Waste storage area and the 2,500-gallon and 3,000-gallon Used Oil aboveground tanks (see, photos below).

It looked as if the used oil tanks were not labeled or marked clearly with the words "Used Oil" in accordance with 40 C.F.R. §279.22 and NJAC 7:26A-6.4(d)4 as the 3,000-gallon tank had no label and the label on the 2,500-gallon tank had worn off. When this was pointed out, Mr. Norman went out and took photos of the other side of the tanks, the working side, and the tanks' "Used Oil" labels were visible.

On October 29, 2020, I had a call with Mr. Norman and Mr. Michael Mulvaney. I indicated that they appear to be in conformance with all RCRA VSQG requirements.

4. REGULATORY CONCERNS

Based on the information submitted and our conversation, there appeared to be no regulatory concerns with the RCRA hazardous waste requirements at TRACEN-Cape May at the time of the OfCM activity.

5. ENVIRONMENTAL ASSISTANCE

The facility should consider reviewing the NJDEP's COVID-19 Regulatory Compliance page for policy changes that may impact its environmental responsibilities. The page can be found at: *https://www.nj.gov/dep/covid19regulatorycompliance/*

Also, to increase the Federal community's understanding and compliance with applicable environmental requirements, EPA, along with other Federal agencies, sponsor Fed Center, the Federal government's home for comprehensive environmental stewardship and compliance assistance

information for Federal facility managers and their agencies. Fed Center can be accessed via the worldwide web at https://www.fedcenter.gov/.

APPENDICES:

A: Photographs
B: EJ Screen
C: FEMA Flood Map
D: Sole Source Aquifer Map

Appendix A: Photographs

Photo 1 – Universal Waste in storage at TRACEN-Cape May

Photo 2 – Used Oil storage tanks at TRACEN-Cape May. Used Oil labels are missing or worn.

Photo 3 – Used Oil storage tanks at TRACEN-Cape May. Used Oil labels are shown.

EJSCREEN Report (Version 2019)

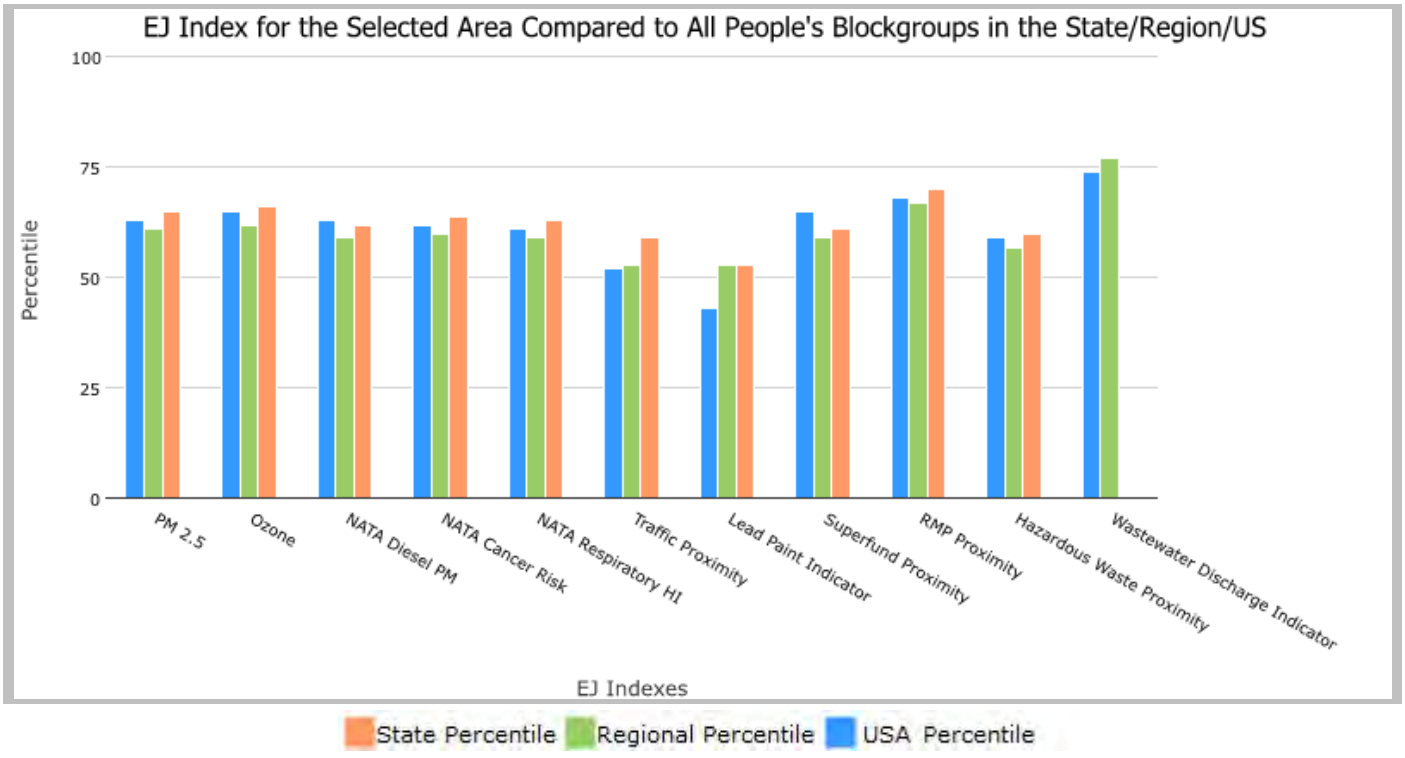
1 miles Ring Centered at 38.948015,-74.882253, NEW JERSEY, EPA Region 2

Approximate Population: 1,211

Input Area (sq. miles): 3.14

USCG Cape May - Appendix B

Selected Variables	State Percentile	EPA Region Percentile	USA Percentile
EJ Indexes			
EJ Index for PM2.5	65	61	63
EJ Index for Ozone	66	62	65
EJ Index for NATA* Diesel PM	62	59	63
EJ Index for NATA* Air Toxics Cancer Risk	64	60	62
EJ Index for NATA* Respiratory Hazard Index	63	59	61
EJ Index for Traffic Proximity and Volume	59	53	52
EJ Index for Lead Paint Indicator	53	53	43
EJ Index for Superfund Proximity	61	59	65
EJ Index for RMP Proximity	70	67	68
EJ Index for Hazardous Waste Proximity	60	57	59
EJ Index for Wastewater Discharge Indicator	N/A	77	74



This report shows the values for environmental and demographic indicators and EJSCREEN indexes. It shows environmental and demographic raw data (e.g., the estimated concentration of ozone in the air), and also shows what percentile each raw data value represents. These percentiles provide perspective on how the selected block group or buffer area compares to the entire state, EPA region, or nation. For example, if a given location is at the 95th percentile nationwide, this means that only 5 percent of the US population has a higher block group value than the average person in the location being analyzed. The years for which the data are available, and the methods used, vary across these indicators. Important caveats and uncertainties apply to this screening-level information, so it is essential to understand the limitations on appropriate interpretations and applications of these indicators. Please see EJSCREEN documentation for discussion of these issues before using reports.

EJSCREEN Report (Version 2019)

1 miles Ring Centered at 38.948015,-74.882253, NEW JERSEY, EPA Region 2

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USCG Cape May - Appendix B

Sites reporting to EPA	
Superfund NPL	0
Hazardous Waste Treatment, Storage, and Disposal Facilities (TSDF)	0

EJSCREEN Report (Version 2019)

1 miles Ring Centered at 38.948015,-74.882253, NEW JERSEY, EPA Region 2

Approximate Population: 1,211

Input Area (sq. miles): 3.14

USCG Cape May - Appendix B

Selected Variables	Value	State Avg.	%ile in State	EPA Region Avg.	%ile in EPA Region	USA Avg.	%ile in USA
Environmental Indicators							
Particulate Matter (PM 2.5 in µg/m^3)	7.17	8.48	0	7.88	20	8.3	20
Ozone (ppb)	48.7	45.5	99	44.4	99	43	88
NATA* Diesel PM (µg/m^3)	0.279	0.696	5	0.941	<50th	0.479	<50th
NATA* Cancer Risk (lifetime risk per million)	20	31	0	32	<50th	32	<50th
NATA* Respiratory Hazard Index	0.24	0.43	0	0.47	<50th	0.44	<50th
Traffic Proximity and Volume (daily traffic count/distance to road)	17	830	5	1400	7	750	14
Lead Paint Indicator (% Pre-1960 Housing)	0.11	0.41	18	0.51	10	0.28	39
Superfund Proximity (site count/km distance)	0.048	0.44	0	0.29	10	0.13	41
RMP Proximity (facility count/km distance)	0.55	0.75	64	0.58	69	0.74	62
Hazardous Waste Proximity (facility count/km distance)	0.04	5.5	1	30	1	4	5
Wastewater Discharge Indicator (toxicity-weighted concentration/m distance)	0	0.24	N/A	0.92	43	14	37
Demographic Indicators							
Demographic Index	41%	34%	66	37%	61	36%	64
Minority Population	42%	44%	55	44%	55	39%	61
Low Income Population	38%	24%	78	29%	70	33%	63
Linguistically Isolated Population	0%	7%	30	8%	33	4%	45
Population With Less Than High School Education	0%	11%	5	13%	5	13%	4
Population Under 5 years of age	10%	6%	85	6%	84	6%	83
Population over 64 years of age	3%	15%	2	15%	2	15%	3

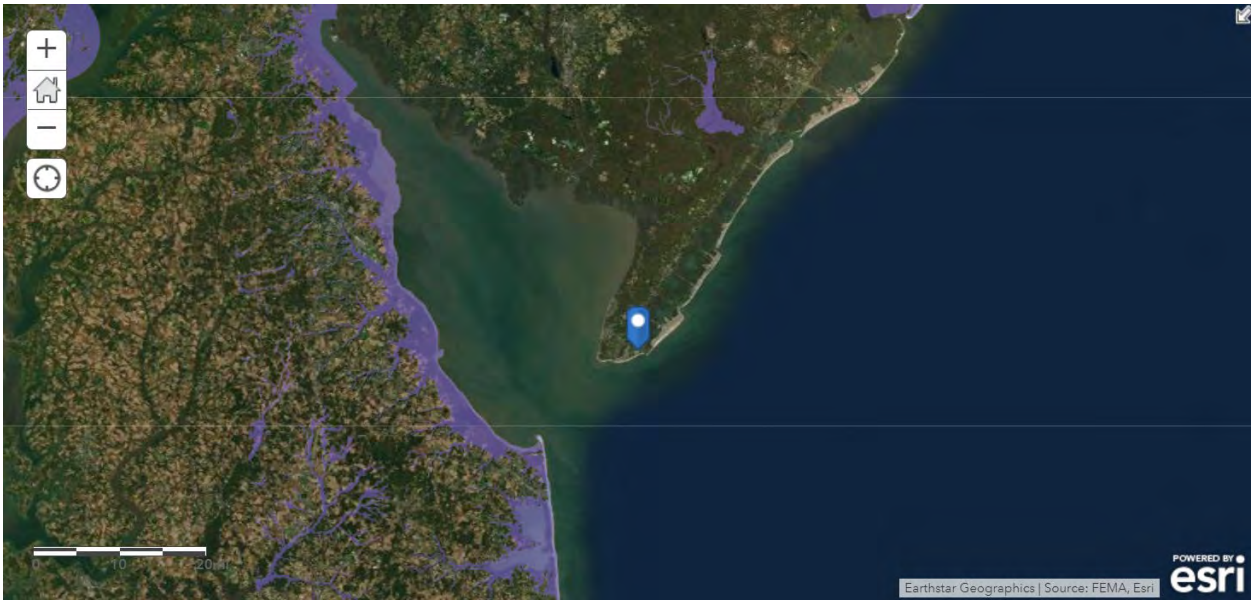
* The National-Scale Air Toxics Assessment (NATA) is EPA's ongoing, comprehensive evaluation of air toxics in the United States. EPA developed the NATA to prioritize air toxics, emission sources, and locations of interest for further study. It is important to remember that NATA provides broad estimates of health risks over geographic areas of the country, not definitive risks to specific individuals or locations. More information on the NATA analysis can be found at: https://www.epa.gov/national-air-toxics-assessment.

For additional information, see: www.epa.gov/environmentaljustice

EJSCREEN is a screening tool for pre-decisional use only. It can help identify areas that may warrant additional consideration, analysis, or outreach. It does not provide a basis for decision-making, but it may help identify potential areas of EJ concern. Users should keep in mind that screening tools are subject to substantial uncertainty in their demographic and environmental data, particularly when looking at small geographic areas. Important caveats and uncertainties apply to this screening-level information, so it is essential to understand the limitations on appropriate interpretations and applications of these indicators. Please see EJSCREEN documentation for discussion of these issues before using reports. This screening tool does not provide data on every environmental impact and demographic factor that may be relevant to a particular location. EJSCREEN outputs should be supplemented with additional information and local knowledge before taking any action to address potential EJ concerns.

Appendix C: Federal Emergency Management Agency (FEMA) 100 Year Flood Zone

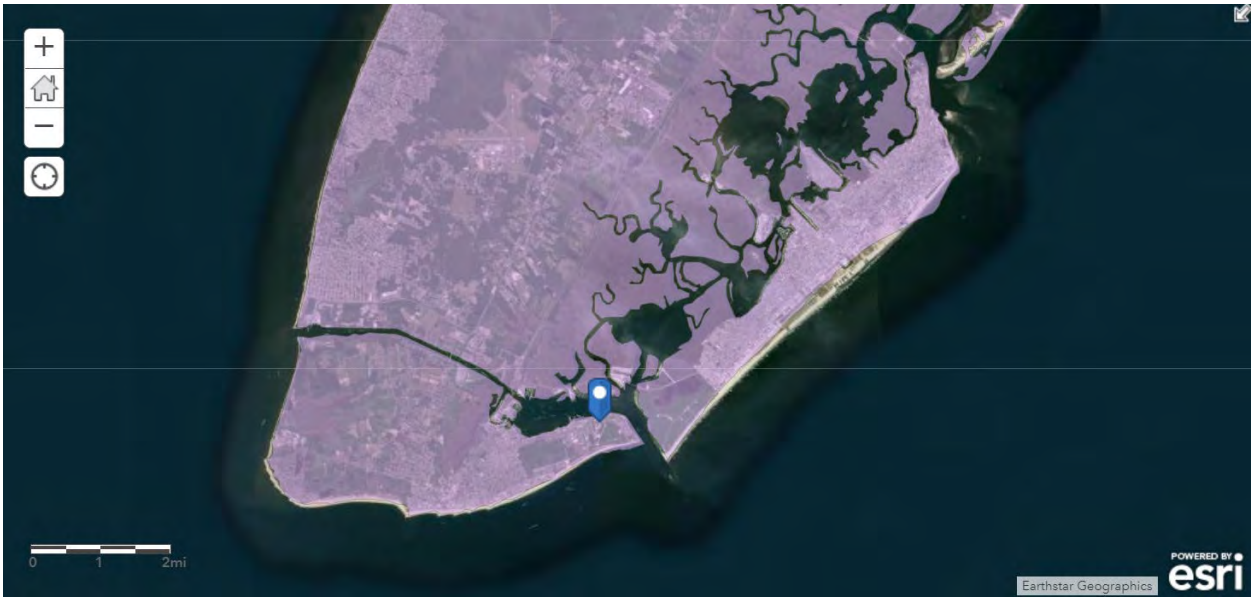
Facility Name: USCG Cape May



The facility is not located within a FEMA 100-year flood zone area.

Appendix D: Sole Source Aquifer Map

Facility Name: USCG Cape May



The facility is located within a Sole Source Aquifer area.