

RCRA Inspection Report

1) Inspector and Author of Report

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2) Facility Information

Physical and Mailing Address

Naval Oceanographic Office (NOO)
1002 Batch Boulevard
Stennis Space Center, Mississippi 39522

3) Responsible Officials

Alex Hollis, Safety/Environmental Manager
Naval Oceanographic Office

4) Inspection Participants

Daryl Himes, US EPA
Brad Justice, Mississippi Department of Environmental Quality (MDEQ)
Alex Hollis, NOO
Krystyn McGuire, NOO
Sidney Lyons, NOO
Charles Baker, NOO

5) Date of Inspection

February 25, 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 unannounced compliance evaluation inspection to determine the NOO's compliance with the applicable requirements of RCRA and the corresponding MDEQ regulations. This was an EPA lead inspection.

8) **Previous Inspection History**

The last RCRA compliance evaluation inspection was performed at the facility on March 28, 2012 by MDEQ personnel. No violations were observed.

9) **Facility Description**

The NOO is located on the property of the Stennis Space Center.

The NOO employs approximately 1,000 civilian, military and contract personnel responsible for providing oceanographic products and services to all elements within the Department of Defense. The NOO services include hydrographic, bathymetric, geophysical, and acoustic products and services.

A fence around the perimeter of Stennis Space Center and security access to the building is used to control access to plant operations.

The facility last notified as a very small quantity generator of hazardous waste on March 1, 2021. Hazardous wastes included on the notification were D001 (ignitable), D002 (corrosive), D003 (reactive), D008, D018, D019-D035. **(Note: This notification was filed subsequent to this inspection after a review of the facility's hazardous waste manifests indicated that during the years 2018, 2019 and 2020 the facility had manifested off-site 86, 126 and 144 kilograms of hazardous waste, respectively, for the entire calendar year).**

10) **Opening Conference**

On February 25, 2021, the EPA inspector, Daryl Himes, accompanied by MDEQ inspector Brad Justice, arrived at NOO at approximately 9:00 a.m. Alex Hollis of NOO immediately received the inspectors. The inspectors introduced themselves, showed their credentials to Mr. Hollis, and explained the purpose of the visit. The inspectors described the anticipated need for the use of a digital camera during the inspection and provided a request for records. Photos were taken during the walk-through inspection by Charles Baker of NOO. The NOO representatives provided an overview of the facility's history and current operations during the opening conference.

11) **Findings**

Note: Unless specified otherwise, all containers of universal wastes were properly labeled with appropriate universal waste language, marked with accumulation start dates of less than one year and closed at the time of the inspection. In addition, unless specified otherwise, all containers of used oil were closed and labeled with the words “Used Oil.” Also, unless specified otherwise, all containers of hazardous waste observed in satellite accumulation areas (SAAs) were observed to be closed and labeled with the words “Hazardous Waste” and an indication of the hazard contents of the container. **(Note: As stated above the facility notified to be a very small quantity generator of hazardous waste. Failures to label, date and keep containers closed below are simply noted in the report as they are not required to do so based on the facility’s current generation rate.)**

A walk-through inspection of the NOO facility was performed in the following areas:

Glider Shop

Underwater gliders are maintained in this area. At the time of the inspection, two 1-gallon and two 5-gallon containers of universal waste batteries were observed in this area. One 5-gallon container of used oil was also observed in this area. (Photo 1)

Acoustic Shop

Underwater sound equipment is maintained and calibrated in this area. At the time of the inspection, two 1-gallon and two 5-gallon containers of universal waste batteries were observed in this area. One 5-gallon container of used oil was also observed in this area. (Photo 2)

Electronic Technicians Shop

Minor electronic equipment repair is performed in this area. At the time of the inspection, four empty 5-gallon containers designated for universal waste batteries were observed (Photo 3).

Fleet Survey Team

Wastes identified in this area were maintained in a metal building. One 5-gallon container of hazardous waste off-spec fuel, one gallon container of hazardous flammable waste adhesives, one 25-gallon container of hazardous waste gasoline, one 25-gallon container of a waste fuel, one 5-gallon container of used oil and one 25-gallon container of used oil were observed in this satellite accumulation area (Photos 4 and 5).

Building 1003 Room 18

Geology sediment analysis is performed in this area. At the time of the inspection, a one-gallon container of universal waste batteries and two 5-gallon containers of hazardous waste acids were observed (Photo 6).

Building 1003 Room 28

Geology sediment analysis is performed in this area. At the time of the inspection, one 5-gallon container of universal waste lead acid batteries and one 5-gallon container of universal waste nickel-cadmium batteries were observed in this area (Photo 7).

Building 1003 Room 110

Ocean modeling is performed in this area. At the time of the inspection, one empty 5-gallon container of universal waste lead acid batteries was observed.

Building 9322

Buoys are managed in this building which is located on a separate property which is not contiguous with the areas discussed above. Wastes were observed (Photos 8 and 9) within a loading dock setting in this building as follows:

- One 25-gallon container of hazardous waste alkaline batteries.
- One 55-gallon container of hazardous waste sandblast medium contaminated with cadmium.
- One 5-gallon container of hazardous waste aerosol cans.
- One 5-gallon container of hazardous waste lead acid batteries.
- One 2-gallon container of universal waste nickel hydride batteries.
- One 5-gallon container of universal waste lead acid batteries.
- One 5-gallon container of universal waste batteries.
- One 1-gallon container of universal waste mercury switches.
- One 5-gallon container of universal waste nickel-cadmium batteries.
- One 55-gallon container of hazardous waste alkaline batteries which was not marked with an accumulation start date.

Building 2408

This building and two metal storage buildings are located on a third separate property which is not contiguous with the areas discussed above.

The two metal storage buildings (one shown in Photo 10) were used by the facility as an outgoing hazardous and universal waste consolidation area before wastes are sent off-site. The metal storage buildings measured approximately 35 feet by 8 feet. One of the metal buildings contained the following:

- Four pallets of universal waste batteries. Each pallet holding 20 boxes of shrink-wrapped boxes.
- Four 5-gallon containers of universal waste batteries.
- One 1-gallon container of universal waste batteries.

The second of two metal buildings had an internal dividing wall which broke the building into two parts. One section of the building contained spill equipment, the other section contained the following hazardous and universal wastes:

- Three 55-gallon, two 25-gallon, thirteen 5-gallon and five 1-gallon containers of universal waste batteries
- One pallet containing ten lead acid batteries
- One 55-gallon, two 25-gallon and two 5-gallon containers of used oil
- One 5-gallon container of hazardous waste acid (no placard w/hazard indication)
- Two 5-gallon containers of hazardous waste aerosols (no placard w/hazard indication)
- One-gallon container of hazardous waste mercury (no hazard indication)

Record Review

A review of the facility's hazardous waste manifests for the past three years indicated that the facility was operating well under the threshold of operating as a very small quantity generator of hazardous waste and not subject to inspection record, contingency plan and training records at the time of this inspection.

It was noted as discussed above that the Naval Oceanographic Office was comprised of three separate (noncontiguous) facilities. A RCRA Identification number has only been issued to one of these facilities. At this point in time, each of these facilities was operating only as very small quantity generators. If in the future, one or more of these facilities become a small quantity generator which generates greater than 100 kilograms of hazardous waste per month, the transfer of hazardous waste from that facility to one of the other two facilities would be prohibited without the receiving facility having a RCRA permit.

12) Signed

DARYL HIMES Digitally signed by DARYL HIMES
Date: 2021.03.30 22:12:25 -04'00'

Daryl R. Himes
Environmental Engineer

Date

Concurrence

ARACELI CHAVEZ Digitally signed by ARACELI
CHAVEZ
Date: 2021.03.30 22:01:24 -04'00'

Araceli B. Chavez
Chief
RCRA Enforcement Section
Chemical Safety and Land Enforcement Branch

Date

ATTACHMENT A

Naval Oceanographic Office

Stennis Space Center, Mississippi

COMPLIANCE EVALUATION Inspection

MS6171624640

February 25, 2021

Photos taken by Daryl R. Himes



Photo 1 – Universal wastes and used oil observed in the Glider Shop



Photo 2 – Universal wastes and used oil observed in the Acoustic Shop



Photo 3 – Universal wastes observed in the Electronic Technicians Shop



Photo 4 -Fleet Survey Team.



Photo 5 -Fleet Survey Team.



Photo 6 – Building 1003 Room 18 Universal and hazardous waste.



Photo 7 – Building 1003 Room 28 Universal waste batteries.



Photo 8 – Wastes observed within Building 9322



Photo 9 – Wastes observed within Building 9322



Photo 10 – One of two metal storage buildings located near Building 2408.