

RCRA Inspection Report

1) Inspector and Author of Report

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2) Facility Information

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3) Responsible Officials

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4) Inspection Participants

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Barron Feit, Fort Bragg
Shawn Hardy, Fort Bragg
Doug Smith, Fort Bragg

Bruce Langston, Fort Bragg
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Wes Hare, NCDEQ
Laurie Benton DiGaetano, USEPA

5) Date of Inspection

June 29, 2022

6) Purpose of Inspection

The purpose of this inspection was to conduct an unannounced compliance evaluation inspection to determine U.S. Army Fort Bragg's compliance with the applicable requirements of RCRA and the corresponding NCDEQ regulations. This was an EPA lead inspection.

7) **Applicable Regulations**

Resource Conservation and Recovery Act (RCRA) Sections 3002 (42 U.S. Code – Annotated U.S.C.A. 6925 and 6927), Title 15A of the North Carolina Administrative Code (NCAC), Chapter 13; and 40 Code of Federal Regulation (C.F.R.), Parts 260 - 270, 273, 278, & 279.

Pursuant to 15A NCAC 13A .0107(a) [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 any 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 130A-294(c) and (g) of the NCSWML, N.C.G.S. § 130A-294(c) and (g) [Section 3005 of RCRA, 42 U.S.C. § 6925], and without complying with 15A NCAC 13A .0107(a) [40 C.F.R. § 262.16(b) or § 262.17(a)], except as required in 15A NCAC 13A .0107(a) [40 C.F.R. § 262.15(a)(7) and (8)], provided that the generator complies with the satellite accumulation area conditions listed in 15A NCAC 13A .0107(a) [40 C.F.R. § 262.15(a)] (hereinafter referred to as the “SAA Permit Exemption”).

Pursuant to 15A NCAC 13A .0107(a) [40 C.F.R. § 262.17], an LQG may accumulate hazardous waste on-site for 90 days or less without a permit or without having interim status, as required by 130A-294(c) and (g) of the NCSWML, N.C.G.S. § 130A-294(c) and (g) [Section 3005 of RCRA, 42 U.S.C. § 6925], provided that the generator complies with the conditions listed in 15A NCAC 13A .0107(a) [40 C.F.R. § 262.17] (hereinafter referred to as the “LQG Permit Exemption”).

Pursuant to 15A NCAC 13A .0111 [40 C.F.R. § 266.80(a)], spent lead-acid batteries being stored for reclamation purposes are exempt from 15A NCAC 13A .0107, .0109, .0110, .0111, and .0113 [40 C.F.R. Parts 262 (except for § 262.11), 263, 264, 265, 266, 270, 124 of this chapter, and the notification requirements at Section 3010 of RCRA] (hereinafter referred to as the “Spent Lead-Acid Battery Exemption”).

8) **Facility Description**

Fort Bragg is a U.S. military installation just west of Fayetteville, North Carolina, with a history dating back to 1918, when Camp Bragg was established as a military reservation at this location. This area was selected for the camp because it had adequate water and rail facilities and suitable terrain and climate that was necessary for year-round training activities. In 1922, Camp Bragg became Fort Bragg, a permanent U.S. Army post. Today, Fort Bragg is home to the XVIII Airborne Corps and to Commands for U.S. Special Operations, Joint Special Operations, U.S. Army Reserve, and U.S. Forces. The installation operates under the NAICS Code 928110 for National Security, with the mission of training and supporting tenant Commands for rapid deployment. Approximately 57,000 military personnel are stationed at Fort Bragg, and an additional 11,000 civilian personnel are employed on-site. The majority of land within the 250-square mile reservation is designated for field maneuvers, training exercises, firing ranges, impact areas and parachute drop zones. The installation also includes buildings and structures for administrative, training, supply, and maintenance activities; housing for families and troops; and infrastructure for public services and community amenities.

The installation has operated as a large quantity generator (LQG) of hazardous waste for over 30 years, and previously operated a permitted hazardous waste storage facility on-site. The installation has closed the permitted storage area, but it continues to operate as an LQG of hazardous waste. Personnel indicated that the installation manages approximately 750 satellite accumulation areas (SAAs) and two hazardous waste central accumulation areas (CAAs). One CAA is located at the base hospital (Womack), and the other is located at the Public Works Business Center (PWBC).

Although the environmental activities, including hazardous waste management operations, at Fort Bragg are coordinated by the Directorate of Public Works and Environment (DPWE), the hands-on activities are primarily performed under contract by Ayuda Companies personnel. In addition, each individual unit on the installation assigns a point of contact for environmental compliance for that unit. Because personnel frequently rotate in and out of these units, standard operating procedures (SOPs) for maintaining environmental compliance are developed for each unit and maintained in an eco-binder for that unit. Ayuda Companies personnel transport hazardous waste from individual SAAs and the Womack CAA to the Public Works Business Center (PWBC) CAA; prepare containers of hazardous waste for shipment offsite to a permitted hazardous waste treatment, storage or disposal facility; provide training to Fort Bragg personnel involved in the generation and management of hazardous waste in SAAs; and conduct semi-annual inspections of areas that generate or manage hazardous waste to assess compliance with the SOPs.

In the 2019 biennial report, which was submitted to NCDEQ on March 4, 2020, Fort Bragg reported shipments of 75 different waste streams. Those shipments included a total of over 100 pounds for each of the following hazardous waste streams during calendar year 2019:

Waste	Code(s)	Pounds
FB141 Paint Booth Blast Filters Floor Coverings & PPE	D006 / D007	15,691
FB078 Lead Shot and Rubber Blocks	D008	15,192
FB148 Paint Related Material	D001 / D007 / D008 / D018 / D035	14,073
FB188 Roads Paint, Cleaning Solution Mix	D002	13,674
FB150 Solvent Bottoms	D006 / D008	13,411
FB068 Alcohol / Methanol Mixture	D001	9,604
FB137 Flammable Aerosols	D001 / D007 / D008 / D035	8,218
FB048 Arms Patches, Weapons Cleaning Items	D008	7,560
FB031 Flammable Adhesive / Sealant	D001 / D035	7,211
FB145 Blast Media	D006 / D007	6,237
FB017 Flammable Absorbent Material	D001 / D018	5,838
FB069 Gasoline, MoGas, Contaminated with Water	D001 / D018	5,837
FB143 LCMS Broken	D008 / D009	5,633

FB086 Fuel Filters (Gasoline)	D001 / D008 / D018	4,942
FB092 Shoot House Mop Water	D008	3,803
FB156 M60 Igniter	D006	3,049
FB142 Aviation Paint Rags	D001 / D007 / D035	2,916
FB233 Decon Water (Simmons AAF)	D006 / D007	2,223
FB018 HEPA Filters (Indoor Firing Range)	D008	2,132
FB082 Calcium Hypochlorite	D001	2,101
FB199 Shoot House PPE	D008	1,745
FB036 Insect Repellent, Clothing App Kit	D001	1,702
FB154 Parts Washer Filter	D006 / D008	1,077
FB026 Sulfuric Acid, Electrolyte	D002	969
FB134 C2 Canisters	D007 / D011	918
FB042 Gram Stain	D001	874
FB205 Phosphoric Acid Compounds	D002	777
FB057 Corrosive Floor Stripper (Base)	D002	647
FB148 Safety Kleen Paint Related Material	D001 / D007 / D018 / D035 / F003 / F005	495
FB010 Potassium Hydroxide Solution	D002	452
FB232 Alcohol Pads	D001	447
FB002 Photo Solution	D011	398
FB070 Isopropyl Alcohol	D001	377
FB064 Photo Fixer (Acid)	D002	365
FB135 Adhesive (Chromium)	D007	326
FB063 Preservcyt Solution	D001	301
FB011 Citrikleen Compound	D001	272
FB227 Flammable / Corrosive Liquid	D001 / D002	261
FB105 Perfumes	D001	230
FB163 Night Vision Intensifier Tubes	D006 / D008	191
FB004 M256 Kit	D001 / D009	188
FB153 Oxygen Generator, Spent	D005	145
FB173 Solvent Bottoms Absorbent Rags	D006 / D008	137
FB045 M256 Simulator	D001 / D002	134
FB099 Pharmaceutical Residue	P001 / P075 / P081	120
FB072 Pasa-Jell (Acid)	D002	107

9) **Previous Inspection History**

The EPA has conducted a total of three RCRA CEIs at the subject facility during the past twenty years, and the most recent one of these RCRA CEIs was conducted on June 11, 2013. NCDEQ has conducted an annual RCRA CEI at the subject facility for over thirty years and found one apparent violation during the past five years. NCDEQ's most recent RCRA CEI was conducted on June 29, 2021.

10) **Opening Conference**

At approximately 9:30 a.m. on June 29, 2022, EPA inspector Laurie Benton DiGaetano, accompanied by NCDEQ inspector Wes Hare, met with Mr. Barron Feit, Chief, Environmental Compliance Branch Fort Bragg, who accompanied the inspectors through the security gate onto the installation and escorted them to the DPWE offices. Mr. Dave Himes, Directorate of Public Works, Environmental Division Chief, immediately received the inspectors. Mr. Himes, Mr. Feit, and the inspectors were joined by additional Fort Bragg personnel, including Jack Wilson, Barron Feit, Shawn Hardy, Bruce Langston, Katie Gibbons, and Doug Smith for the opening conference. The inspectors introduced themselves, showed their credentials to Mr. Himes, and explained the purpose of the visit. Mr. Himes provided an overview of the facility's current operations, and the participants discussed potential select areas to visit during the inspection.

The inspectors described the anticipated use of equipment (digital camera) and discussed the records to be reviewed. The inspectors discussed the installation's ability, pursuant to 40 C.F.R. § 2.203, to assert a business confidentiality claim for information submitted to EPA. Personnel did not assert a business confidentiality claim. The installation does not appear to meet the Small Business Regulatory Enforcement Fairness Act's classification of a "small business," which is generally set by the Small Business Administration using the business' SIC/NAICS code and annual receipts or number of employees. Therefore, the EPA inspector did not provide a copy of the agency's information sheet for small businesses, which can be found at <https://www.epa.gov/sites/production/files/2017-06/documents/smallbusinessinfo.pdf>. The inspection participants also discussed health and safety protocols and required personal protective equipment before representatives led the inspectors on a tour of selected operations.

11) **Inspection Observations**

Public Works Business Center (PWBC) CAA: The inspection participants visited the PWBC CAA, which is located next to the DPWE offices. The entire CAA includes fourteen individual storage lockers / sheds and surrounding additional storage space on a concrete pad covered by a metal roof, and four designated rows for additional storage inside the adjacent building next to this covered area. Materials managed in this CAA include hazardous waste, universal waste, and nonhazardous waste. The individual storage lockers / sheds are referred to as "bays," and each bay is equipped with a panic button to sound an emergency alarm. The CAA is also equipped with fire extinguishers and emergency response equipment.

Each bay is identified with a number above the door. Magnetic DOT hazard placards are used on the outside of the bay door to indicate the hazard(s) associated with wastes stored in that bay. When the magnetic DOT hazard placards are not in use, they are stored on the inside of the bay door. At the time of the inspection, some of the bay doors were propped open to allow personnel working in this area to access the storage area(s) within the bays. As a result, the extra DOT hazard placards that were stored on the inside(s) of the bay doors were clearly visible while the relevant magnetic DOT hazard placard(s) were hidden behind the open door. In order to avoid confusion, the EPA recommends adjusting the method for storing magnetic DOT hazard placards when they are not in use so that they do not appear to be on display to communicate the potential hazards for that bay when the door is propped open.

The inspectors made the following observations for the fourteen bays in this CAA:

DOT Hazard Placard(s)		Contents	DOT Hazard Placard(s)		Contents
1	Corrosive (Acid) Toxic	One 55-gallon drum Four 5-gallon containers And batteries	8	Flammable Flammable Gas DOT 9	Four 55-gallon drums
2	Flammable	Six 30-gallon drums Five 10-gallon containers	9	Toxic Flammable	Seven 55-gallon drums
3	N/A	Empty	10	Flammable Flammable Gas Toxic DOT 9	Five 55-gallon drums
4	Corrosive (Base) Toxic	One 55-gallon drum Three 5-gallon containers	11	Flammable Gas	Two 55-gallon drums
5	Toxic	One 55-gallon drum	12	Toxic	Four 55-gallon drums
6	Flammable Gas	Two 55-gallon drums	13	Flammable Flammable Gas Toxic	Nine 55-gallon drums
7	Toxic Flammable	Seven 55-gallon drums	14	Oxidizer	Two 10-gallon containers

The inspectors observed additional containers on wooden pallets on the area of the concrete pad that was surrounded by the storage bays and inside the adjacent building. The containers observed on the concrete pad included: nine 55-gallon drums of hazardous waste, ten 55-gallon drums of universal waste, four 55-gallon drums of aerosol cans, five 55-gallon drums of nonhazardous waste, two empty 55-gallon drums, one 5-gallon container of universal waste, and one pallet of spent lead-acid batteries. The containers observed inside the building included two cubic yard boxes of hazardous waste and one cubic yard box of universal waste.

Each container of hazardous waste observed in this CAA was identified with an orange or white hazardous waste label, and personnel explained that a white label indicates that the container is still in use and more waste may be added to it, but an orange label indicates that the container is closed and ready to be shipped offsite. In addition to the words “hazardous waste,” each label included an indication of the hazards associated with the waste, the accumulation start date for that container, the number of the container, the weight of the container, a description of the waste, the waste code(s) associated with the waste, and the waste profile number for that waste stream. The oldest date observed on any container was May 10, 2022. The inspectors also observed one-inch red dot stickers that were marked with a number and affixed to some containers in this area. Personnel explained that the dots are added to containers that will be sent offsite with the next waste shipment. The numbers on the stickers are used for internal tracking associated with the purchase request for that shipment.

Facility representatives explained that personnel check the voltage of each lead-acid battery that is brought to this area in order to determine if the battery has sufficient charge for continued use. Those batteries with sufficient charge are secured in a storage bay for future use and those

batteries without sufficient charge are stored for off-site reclamation. According to facility personnel, the batteries observed in Bay 1 are designated for continued use at the facility, and the remaining batteries observed on the covered concrete pad are being managed under the Spent Lead-Acid Battery Exemption prior to shipment off-site for reclamation.

Used aerosol cans generated throughout the installation are brought to the PWBC CAA where they are separated into one of two categories. Aerosol cans containing spray paints or flammable products are punctured at this CAA. The punctured cans are sent off-site for metals recycling, and the accumulated contents of the punctured cans are managed as hazardous waste. Aerosol cans for products other than spray paints or flammable products are not punctured on-site. Instead, those aerosol cans are sent off-site as universal waste.

Materials Maintenance Division - Allied Trades: Although some basic vehicle maintenance activities are performed at the unit operating level, the Materials Maintenance Division (MMD) is responsible for all field level maintenance at Fort Bragg. The MMD's Allied Trades area houses a blast booth, three paint booths, and a maintenance area. The inspectors observed six SAAs in the MMD Allied Trades area:

- One SAA for accumulating hazardous waste paint gun residue in the paint gun cleaning room;
- One SAA for accumulating hazardous waste blast media at the blast booth air handling system;
- One SAA for accumulating hazardous waste contaminated PPE between the blasting and painting booths area;
- One SAA for accumulating hazardous waste contaminated PPE in the maintenance area;
- One SAA for accumulating aerosol cans in the maintenance area; and
- One SAA for accumulating hazardous waste adhesives in the maintenance area.

The MMD Allied Trades paint gun residue SAA is located in a small room near the painting booths. The inspectors observed one 55-gallon drum and a Safety-Kleen parts washer unit in this room, which is accessible from outside of the building. Personnel explained that they empty the contents of the paint gun into the 55-gallon drum before they clean the gun in the Safety-Kleen unit. The 55-gallon drum was labeled as hazardous waste, it was identified with a DOT flammable liquids hazard placard, and it was equipped with a latched funnel lid. The Safety-Kleen unit was equipped with two 5-gallon drums of solvent, which is recirculated within the unit for reuse until the unit is serviced. Fort Bragg representatives stated that Safety-Kleen personnel routinely service the unit by removing the 5-gallon containers of used solvent and replacing them with two 5-gallon containers of clean solvent.

The inspectors observed two 20-gallon drums in the MMD Allied Trades blast booth air handling system SAA. Personnel explained that when these containers are serviced, their contents are consolidated into a 55-gallon drum for transfer to the CAA and shipment off-site. The combined contents of these two 20-gallon containers are less than 55-gallons, and Fort Bragg does not fill the 55-gallon drum with spent blast media because the density of the spent blast booth media would cause a full 55-gallon drum to exceed the weight limit for transport. Each 20-gallon

container observed in this SAA was labeled hazardous waste, identified with a DOT toxic hazard placard, and connected to the air handling system.

Contaminated gloves, suits and other PPE used in the blasting and painting booths, contaminated paper used to catch overspray in the painting booths, and dirty air filters used in the booths' air handling systems are accumulated in the MMD Allied Trades blasting and painting area PPE SAA. The inspectors observed one 55-gallon drum in this SAA. The drum was labeled hazardous waste paint PPE and identified with a toxic DOT hazard placard.

Contaminated PPE used in the maintenance area is accumulated in the MMD Allied Trades maintenance area PPE SAA. Personnel explained that employees sand vehicles in this area, and PPE is managed as hazardous waste because it may become contaminated with paints, sealants, caulks and/or chemicals. The inspectors observed one 55-gallon drum in this SAA. The drum was labeled hazardous waste and identified with a toxic DOT hazard placard.

The inspectors observed one 55-gallon drum in the MMD Allied Trades maintenance area aerosol can SAA. These used aerosol cans will be transferred to the CAA where personnel will separate them into one of two categories: those that will be punctured on-site and sent off for metals recycling, and those that will be sent off-site as universal waste.

Excess adhesives generated in the maintenance area are accumulated in the waste adhesives MMD Allied Trades maintenance area SAA. The inspectors observed one 55-gallon drum in this SAA. The drum was labeled hazardous waste and identified with a flammable liquid DOT hazard placard.

Materials Maintenance Division – Vehicle Maintenance: The MMD's Vehicle Maintenance area houses several stations for vehicle maintenance activities. Wastes generated in this area are managed in one of two SAAs: a caged SAA near the door from the Allied Trades area and a SAA at the far end of the building.

The inspectors observed two 55-gallon drums of used dry sweep and one 55-gallon drum of used oil filters and used fuel filters in the caged SAA. Personnel explained that the installation has very few vehicles that use motor gasoline (mogas), and wastes containing motor gasoline would be accumulated as mogas hazardous waste. Used diesel fuel filters are accumulated with used oil filters. No mogas waste was observed in this caged area at the time of the inspection.

The inspectors observed one 55-gallon drum for accumulating used mogas filters in the SAA at the far end of the building. This drum was labeled hazardous waste and identified with a flammable solid DOT hazard placard. The inspectors also observed one 55-gallon drum for accumulating used oil filters and another 55-gallon drum for accumulating used absorbent pads in this SAA.

Materials Maintenance Division - Armory: According to installation personnel, hazardous wastes generated from gun cleaning activities in all on-site armories are managed using the same SOPs. One such armory is located at the MMD, which manages one SAA for accumulating hazardous waste generated from gun cleaning activities. The inspectors observed one 5-gallon container in

this SAA. The container was closed, labeled hazardous waste, and identified with a toxic DOT hazard placard.

Womack CAA: Fort Bragg manages a hazardous waste CAA in a small outbuilding behind the Womack Hospital. The area was identified with a sign which read “danger, do not enter,” “hazardous area,” and “90-day temporary storage.” The area is equipped with an emergency alarm, portable fire extinguisher, spill control equipment, and an eyewash station.

The inspectors observed four 5-gallon buckets on a secondary containment pallet in the CAA. One bucket was not labeled, but personnel determined that it contained nonhazardous waste betadine solution. The remaining three buckets were labeled as hazardous waste and marked with an accumulation start date:

- Hazardous waste pathology micro, dated June 22, 2022
- Hazardous waste Clark pharmacy, dated May 11, 2022
- Hazardous waste support pharmacy ethyl chloride, dated April 15, 2022

The inspectors also observed one 35-gallon drum and three 55-gallon drums along the wall to the left inside this building:

- One empty 55-gallon drum with no label
- One 55-gallon drum of dirty dry sweep
- One 55-gallon drum labeled hazardous waste with no accumulation start date or indication of the hazards of its contents. Personnel determined that this was mislabeled and did not contain hazardous waste.
- One 35-gallon drum of hazardous waste methanol waste, dated June 24, 2022

Contingency Plan: The actions that facility personnel should take in response to an emergency are described in the facility’s Contingency Plan, which was last updated in 2019. The plan lists the names and emergency telephone numbers for persons identified as emergency coordinators, and it describes actions facility personnel must take in response to fires, explosions, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water at the facility. Fort Bragg is a military installation with an on-site police department, fire department, emergency response teams, and hospital. The contingency plan includes a list of emergency equipment available at the facility’s CAA and an evacuation plan for personnel. The evacuation plan describes signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes.

During the opening conference, Fort Bragg personnel stated that they are currently working on developing a quick reference guide of the contingency plan that will be most useful for entities that might be called upon to provide assistance during an emergency.

Training Records: The inspectors reviewed facility job descriptions and employee names that were provided for Fort Bragg personnel and contractors with hazardous waste management duties. Job descriptions were provided for the Fort Bragg Environmental Protection Specialist, and for Ayuda Companies’ Hazardous Waste Program Support Manager and Hazardous Waste

Technicians. Each description included the requisite skill, education, or other qualifications, and duties of facility personnel assigned to that position. The installation also provided a description of the type and amount of introductory and continuing training to be given to each person filling the positions with hazardous waste management duties. One individual was named as the Fort Bragg Environmental Protection Specialist and another as the Ayuda Companies' Hazardous Waste Program Support Manager. Six individuals were named as the Ayuda Companies' Hazardous Waste Technicians. The inspectors reviewed records of hazardous waste training which documented that those individuals completed hazardous waste training in 2021 and 2022.

Waste Manifest Records: The inspectors randomly selected a number of hazardous waste manifest records and land disposal restriction forms for shipments of hazardous waste sent from the facility since the last RCRA CEI in 2021. Records show that hazardous wastes are routinely shipped to Heritage Environmental (IND093219012), Heritage Thermal (OHD980613541), and Rineco (ARD981057870), and that universal wastes are routinely shipped to Lighting Resources (IN0000351387).

Inspection Records: The inspectors reviewed Fort Bragg's available records of inspections of the hazardous waste CAAs since January 2021. The inspection records are designed so that each month is recorded on a single page. That page identifies the unit, building, month and year associated with the record and the signature and date of the person filling out the form. In addition, the date for each weekly inspection is recorded with the initials of the individual conducting the weekly inspection.

The inspection log includes a checklist to record the required weekly observations about leaking containers and for deterioration of containers caused by corrosion or other factors. Specifically, the checklist includes a space to record weekly container management observations for the condition / compatibility of the containers, if the containers are closed, if they are labeled hazardous waste or universal waste, if they are dated, the classification of the waste, whether the containers are on pallets, if a SAA contains less than 55-gallons, if a SAA is protected from the weather, and if the containers are grounded. No deficiencies or corrective actions were noted on the inspection records.

The checklist also includes a space to record monthly storage management observations for the capacity of the secondary containment, the separation from storm drains, the presence of a fire extinguisher and spill control equipment, the security of the area, and the segregation of incompatible wastes; to record monthly training observations for the assignment of an environmental compliance officer, the assignment of an environmental compliance assistant, the training of the environmental compliance officer and assistant, the job descriptions of the environmental compliance officer and assistant, and the confirmation that training has been provided within the past twelve months; and to record monthly administration observations for conducting weekly inspections, maintaining inspection and training records, providing regulations and guidance documents, providing approved standard operating procedures, conducting an annual hazard inventory, maintaining safety data sheets, maintaining a site-specific spill plan, displaying an environmental compliance officer / assistant poster, and ensuring that emergency equipment is in working order.

12) **Closing Conference**

The inspectors conducted the exit meeting with Fort Bragg personnel, including Dave Himes, Jack Wilson, Barron Feit, Shawn Hardy, Bruce Langston, and Doug Smith. During this meeting, the inspectors stated their preliminary conclusions of the inspection.

13) **Inspection Findings**

Based on the observations made during the inspection, Fort Bragg was not apparently deficient with any of the RCRA requirements.

14) **Signature**

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Date: 2022.08.08 07:54:43 -04'00'

Laurie Benton DiGaetano
Senior Enforcement and Compliance Specialist

Concurrence

ARACELI CHAVEZ Digitally signed by ARACELI CHAVEZ
Date: 2022.08.08 21:58:40 -04'00'

Araceli B. Chavez
Chief
RCRA Enforcement Section