

RCRA Inspection Report

1) Inspector and Author of Report

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Enforcement and Compliance Assurance Division
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2) Facility Information

United States Coast Guard Base
Elizabeth City (USCG – EC)
1664 Weeksville Road
Elizabeth City, North Carolina 27909
Pasquotank County

EPA ID#: NC2690308232
NAICS #: 922190 for Justice, Public Order,
and Safety Activities

3) Responsible Officials

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4) Inspection Participants

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Chris Dunn, USCG – EC
David Ricks, USCG – EC
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Chief Petty Officer Langan, USCG – EC
Chief Warrant Officer Flor, USCG – EC
Annette James, USCG – EC
Ben Gurganus, USCG – EC
Melinda Lewis, USCG – EC
Jason Landing, USCG - EC

Andrea Stermer, NCDEQ
Alan Newman, USEPA

5) Date of Inspection

March 21, 2023, 8:20 a.m. – 7:05 p.m.

6) **Applicable Regulations**¹

Resource Conservation and Recovery Act (RCRA) Sections 3002 (42 U.S. Code – Annotated U.S.C.A. 6925 and 6927), and 40 Code of Federal Regulation (C.F.R.) Parts 260 - 270, 273, 278, & 279; [15A NCAC 13A .0101 to .0119]; and Hazardous Waste Management Permit NC2690308232 R-2.

The North Carolina Solid Waste Management Law, N.C.G.S. § § 130A-17 to -28 and 130A-290 to - 310.22, and North Carolina Hazardous Waste Management Rules, 15A NCAC 13A .0101 to .0119.

Pursuant to 15A NCAC 13A .0119 [40 C.F.R. § 273.9], a small quantity handler of universal waste (SQHUW) is a universal waste handler who does not accumulate 5,000 kilograms or more of universal waste (batteries, pesticides, mercury-containing equipment, lamps, or aerosol cans, calculated collectively) at any time.

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”).

7) **Purpose of Inspection**

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.

The purpose of this inspection was to conduct an unannounced compliance evaluation inspection to determine USCG – EC’s compliance with the conditions of its RCRA Hazardous Waste Facility Operating Permit (NC2690308232), the applicable requirements of RCRA, and the corresponding North Carolina regulations. This was an EPA lead inspection.

8) **Facility Description**

The USCG – EC is a regional command that provides logistics, engineering, administrative, financial, purchasing, and health care services to Coast Guard units throughout North Carolina. The 880-acre facility was constructed as a Navy Air Base in 1938, and it currently occupies approximately 67 acres of developed real estate, including runways, taxiways, airport traffic control tower, roadways, and more than 100 buildings. The facility is home to a USCG - EC aircraft servicing facility and a wide range of support facilities that include numerous aircraft hangars, aircraft wash racks, painting and paint removal areas, engine maintenance, jet fuel storage areas, three active runways and taxiways, health, welfare, and recreation areas. The land accessible portions of the facility are surrounded by a six-foot chain link fence topped with three strands of barbed wire. Traffic and personnel enter the Base through one of two gates, and security guards control entry at both gates. The facility has approximately 5,000 employees, with three shifts operating over a 24-hour period.

Base Elizabeth City acts as the host command or “Landlord” for five tenant commands and two detachments at the USCG – EC. As the host command, Base Elizabeth City is responsible for maintaining and operating the facility and for furnishing services and facilities to all assigned tenants. The Coast Guard Aviation Logistics Center is a tenant command responsible for accomplishing overhauls, major repairs, and modifications of USCG aircraft and aeronautical equipment. This tenant provides procurement, storage, stock and control of aeronautical equipment; preserves, stores and maintains aircraft; and provides technical engineering support to USCG aeronautics and avionics. The Aviation Technical Training Center is a tenant command responsible for training USCG personnel to fill the needs of USCG aviation ratings. The Air Station Elizabeth City is a tenant command responsible for conducting air operations via HC-130 from Newfoundland to the Azores to the Caribbean and for conducting HH-60J search and rescue operations within USCG Districts east to Bermuda. The Station (Small Boat) Elizabeth City is a tenant command responsible for operating rescue boats that provide search and rescue operations for regional water. The APO Aircraft Project Office is a tenant command responsible for the C-27J Spartan aircraft that conduct Medium Range Surveillance. The Electronic Support Detachment provides electronic support to commands onboard the Elizabeth City facility, and the Civil Engineering Unit – Cleveland Detachment provides civil engineering support for construction and remediation projects

In 2016, the Coast Guard also took over operations at the USGC Aviation Logistics Center Heavy Maintenance facility, located next to the USCG – EC at 1060 Consolidated Road. The Consolidated Road facility has been operating under the EPA ID# NC0991302718 since 2005, and it is separated from the USCG – EC facility by a public road. Although certain USCG – EC personnel may have hazardous waste management duties and responsibilities at both locations, the USGC Aviation Logistics Center Heavy Maintenance facility continues to operate as a

separate LQG under the EPA ID# NC0991302718. Only the USCG – EC facility (EPA ID# NC2690308232) has been evaluated as part of this report.

Hazardous wastes are generated at the USCG – EC facility by various operations including aircraft maintenance, training of enlisted personnel in aircraft maintenance, and overhaul of Coast Guard aircraft. The USCG – EC facility has been operating as a large quantity generator (LQG) and permitted hazardous waste storage facility at the subject location for over thirty years. All hazardous wastes managed at the facility originate from on-site activities, and no wastes may be accepted from off-site (except in an emergency). The current Hazardous Waste Management Permit, Number NC2690308232 R-2, was issued by the North Carolina Department of Environmental Quality (DEQ) on July 14, 2020 and set to remain in effect until July 14, 2030.

Various tenants on the facility generate hazardous waste and transfer them to the Environmental Compliance Office (ECO) for disposal. Wastes are initially collected in approved containers, which are managed under the direction of the responsible Area Supervisor. When full, the containers are transferred under written receipt to the permitted hazardous waste storage building for further management and storage. In addition, wastes such as expired materials, may be turned directly into the Hazardous Materials Pharmacy (HazMart) or the ECO. The waste is then stored until it is shipped off base by a licensed waste hauler to a hazardous waste disposal or recycling facility. Prior to shipment, a Defense Logistics Agency (DLA) contractor visits the facility to inventory, overpack, label, and prepare manifests for the wastes. In general, the size of hazardous waste containers stored on-site does not exceed a 55-gallon drum or a one cubic yard shipping box, although paint booth filters are routinely accumulated and shipped off-site in roll-off containers.

The permitted Container Storage Building 185 was built and commissioned during 1989 and is currently the only permitted hazardous waste management unit used to store hazardous waste at the USCG – EC. This building consists of a 75-foot by 40-foot open-sided prefabricated building, which is contained within a 7-foot chain link fence with locked access gates. Warning signs reading “Danger, Hazardous Waste Area No Smoking, Authorized Personnel Only” are posted on the four sides of the fence. The covered building is divided into three identical concrete cells, which are defined and divided by a six-inch by six-inch concrete curb. According to the permit, each cell is coated with two layers of a chemically resistant finish to prevent seepage into the concrete should a spill occur, and the floor is sloped to a blind sump for collecting liquids. In addition, each cell has a poured, sloped access ramp to allow access of forklift trucks for the placement and removal of drums of hazardous waste.

According to the permit, hazardous wastes within the permitted storage area are containerized in either 5-, 30- or 55-gallon drums or DOT shipping containers and stored on wooden pallets. Paint filters are stored in DOT shipping boxes that have a maximum capacity of one cubic yard. Each cell has the capability of holding up to ninety 55-gallon drums. Each cell has a maximum permitted capacity of 45 drums (2,250 gallons). Pallets of waste must be arranged with a minimum of two feet of aisle space between rows, and containers may not be stacked vertically.

The USCG – EC is permitted to store the following hazardous waste codes in the Container Storage Building:

D001 – ignitable	D035 – methyl ethyl ketone
D002 – corrosive	D036 – nitrobenzene
D003 – reactive	D038 – pyridine
D005 – barium	D039 – tetrachloroethylene
D006 – cadmium	D040 – trichloroethylene
D007 – chromium	F001 – spent halogenated solvents
D008 – lead	F003 – spent halogenated solvents
D009 – mercury	F005 – spent halogenated solvents
D011 – silver	U158 – 4,4’methylenebis (2-chloro) benzenamine
D018 – benzene	U220 – methyl-benzene

The three cells within the permitted Container Storage Building are used to segregate three types of incompatible wastes: flammables, solvents, and heavy metal hazardous wastes; oxidizer, reactive and photo chemical hazardous wastes; and corrosive hazardous wastes. Flammables, solvents and heavy metals wastes generated at the facility typically include paint related materials, aerosol can contents, drip cloth and paint chips, parts washer and paint gun cleaner fluid, blast media, paint booth filters, paper and rags, dust filters and debris, spent floor stripper, sealants and adhesives, solvents, solvent-contaminated wipes, fuels and soldering wastes. Oxidizer, reactive and photo chemical wastes include: alodine-contaminated wipes, explosive actuators, and nitric acid. Corrosive wastes typically include waste acids and alkalis (dip tank cleaning), waste floor stripper with sodium hydroxide, sulfuric acid and hydrochloric acid.

The USCG - EC also manages five Central Accumulation Areas (CAAs) where hazardous wastes may be stored for up to ninety days. The main CAA is located within a caged, covered area next to the HazMart unit in Building 96. The HazMart unit dispenses and tracks hazardous materials used throughout the base, the HazMart personnel are responsible for maintaining this CAA. The USCG EC’s second CAA is located within a covered caged area just outside of Building 87. While there is a can crusher for empty paint cans located in this CAA, it is not in service. The CAA is used to accumulate and store non-empty paint cans that cannot be crushed and hazardous waste paint related materials generated by the paint crushing unit. The other three units are associated with the cornstarch blast media collection (2 near the baghouses in Building 77, and 1 co-located with the TSDF / Bldg 185 that serves to hold waste cornstarch blast media).

The USCG - EC uses a corn starch-based blast media known as EnviroStrip GPX to remove paint from incoming aircraft prior to repainting. The facility uses and reuses this blast media, which causes the particle size to break down and become smaller over time. The blast media also picks up traces of heavy metals during the paint stripping process and has failed the TCLP for the presence of chromium on some occasions. Eventually, the used blast media is no longer suitable for continued use stripping paint from aircraft at USCG - EC. Midvale Environmental Technologies, the company that provides the USCG - EC with the EnviroStrip GPX product, purported to have found a market for the used media to be used at a permitted hazardous waste

treatment, storage, and disposal (TSD) facility in Hannibal, Missouri. In a letter dated February 19, 2003, the North Carolina DENR (now DEQ) agreed with Midvale Environmental Technologies request to ship used EnviroStrip GPX blast media to Continental Cement Company (CCC) as an absorbent product. Approval for that was rescinded on February 29, 2019, and now the used cornstarch blast media is disposed of as hazardous waste.

9) **Previous Inspection History**

NCDEQ has conducted three RCRA CEIs at the subject facility between 2020 and 2022 and found no violations during those inspections.

10) **Opening Conference**

On March 21, 2023, EPA inspector Alan Newman, accompanied by North Carolina inspector Andrea Stermer, arrived at USCG-EC at approximately 8:20 am. Chris Dunn, Environmental Protection Specialist, immediately received the inspectors. Chriss Dunn and the inspectors were joined by Leilani Woods, for the opening conference. The inspectors introduced themselves, showed their credentials to Leilani Woods, and explained the purpose of the visit.

The inspectors described the anticipated use of equipment (digital camera) during the inspection and provided a request for records. 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 submitted to EPA. The company did not assert a business confidentiality claim.

Leilani Woods 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 Leilani Woods and Chris Dunn led the inspectors on a tour of the Facility operations.

11) **Inspection Observations**

- Satellite Accumulation Areas (SAAs)

There are approximately 160 SAAs located throughout the base (Photographs 1-9). Below are the ones targeted for inspection.

USCG – EC was managing hazardous in the SAAs in the following areas:

Building/Shop	Areas	Waste Types
6 - Aviation Technical Training Center (ATTC)	Fenced Cage	Waste aerosol cans (D001/F003 - empty)

6 (ATTC)	Room 9	Alodine wipes (D007), sealants and adhesives (D001/D007/D008/D011/D018/D035), and solvent wipes (D006/D035/F005)
4 (ATTC)	Room 184A	Waste Solder (D008/D011)
75 – Composite Shop	Shop 653 – Sanding Room 1	Waste composite dust (D006/D007) and waste solvent wipes (D006/D035/F005)
75 – Composite Shop	Shop 653 – Hull Room	Alodine wipes (D007), waste solvent wipes (D006/D035/F005), and composite dust (D006/D007)
75 – Composite Shop	Shop 652Hanger Deck	Waste solids with chromium (D007)
75	HazMat Issue Center (Chemical Issue Center (CIC)	Waste sealants and adhesives (D001/D007/D008/D011/D018/D035) and waste aerosol cans (D001/D008/D035)
75	Shop 665 – Wiring/Harness	Waste Solder (D008/D011)
75	Shop 651- Composite Back Shop	Waste solvent wipes (D006/D035/F005) and alodine wipes (D007)
75	Open Hanger Area	Three (3) containers of alodine wipes (D007) and eight (8) containers of waste solvent wipes (D006/D035/F005)

Each container was closed, in good condition, and labeled with the words “Hazardous Waste” and with an indication of the hazard.

- Building 77 SAA

In Hanger 77, the inspection team noted three 55-gallons of cornstarch blast media (D007) that were not labeled with the words hazardous waste and two of these containers were not labeled with an indication of the hazard (Photographs 10-11). Facility personnel stated that these containers were moved throughout the hanger to vacuum up waste from the nearby CAAs (Filter Bank CAA and Control Room CAA) and on the work area of the hanger floor after blasting off metal parts during maintenance operations. The volume of the combined containers was greater than 55 gallons (1/3 full, 1/3 full, and 2/3 full respectively) on the day of the inspection. Two of these containers were affixed with vacuum attachments to the lid. One container was labeled during the inspection with the words hazardous waste (Photograph 11).

Pursuant to 15A NCAC 13A .0107(a) [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.

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)].

- Clinic Building 128 SAA

The inspection team toured USCG-EC's health clinic. In the pharmacy, facility personnel stated that dropped or expired pills are collected in a container for disposal. The inspection team noted one open 5-gallon container labeled as "Hazardous Waste Pharmaceuticals" and labeled with an accumulation start date of July 23, 2021 (Photograph 12-14). This container should be closed except when adding or removing wastes and is allowed to be stored for up to one year. USCG-EC was also accumulating epinephrine pens and potentially credible pharmaceuticals in containers (Photographs 15-16). Pharmacy personnel stated that controlled substances kept in a secured area and that waste Controlled substances would be accumulated in an adjacent space in the secured area.

USCG-EC operates an amalgam recovery system to intercept bits of waste from entering the solid waste or liquid waste streams from the dental clinic. The filter operates on waste amalgam removed through suction from all dental chairs and collected in a Solmetex Machine (Photograph 17). The most recent shipment of this waste was on May 21, 2021.

Pursuant to 15A NCAC 13A .0111 [40 C.F.R. § 266.502(a)(1)], standards for healthcare facilities managing non-creditable hazardous waste pharmaceuticals, a healthcare facility must notify the EPA Regional Administrator, using the Site Identification Form (EPA Form 8700–12), that it is a healthcare facility operating under this subpart. A healthcare facility is not required to fill out Box 10.B. (Waste Codes for Federally Regulated Hazardous Waste) of the Site Identification Form with respect to its hazardous waste pharmaceuticals. A healthcare facility must submit a separate notification (Site Identification Form) for each site or EPA identification number. A healthcare facility that already has an EPA identification number must notify the EPA Regional Administrator, using the Site Identification Form (EPA Form 8700–12), that it is a healthcare facility as part of its next Biennial Report, if it is required to submit one; or if not required to submit a Biennial Report, within 60 days of the effective date of this subpart, or within 60 days of becoming subject to this subpart.

Pursuant to 15A NCAC 13A .0111 [40 C.F.R. § 266.502(d)(3)], a healthcare facility must keep containers of non-creditable hazardous waste pharmaceuticals closed and secured in a manner that prevents unauthorized access to its contents.

Pursuant to 15A NCAC 13A .0111 [40 C.F.R. § 266.502(f)(1)], standards for containers used to accumulate non-creditable hazardous waste pharmaceuticals at healthcare facilities, a healthcare facility may accumulate non-creditable hazardous waste pharmaceuticals on site for one year or less without a permit or having interim status.

- **Universal Waste and Used Oil Storage**

The inspection team noted universal wastes in the Tool Room of Building 75. There were two 5-gallon containers of universal waste batteries: one for alkaline batteries and one for lithium, NiCad, and Ni Metal Halide batteries (Photograph 18). These containers were in good condition, closed, and marked with an accumulation start date of March 1, 2023. Underneath these two containers was an 18-inch cube for storage of universal waste lamps. The container was labeled as universal waste and in good condition (Photograph 19). The accumulation start date on the container was March 1, 2022. This was documented as an error in the year (should have been marked 2023) through universal waste shipping documents. This is an area of concern for the inspection team.

USCG – EC operates multiple used oil containers and tanks at the base. One 55-gallon container in Building 75, one 120-gallon double walled tank near Building 185 Annex and one 55-gallon container in the HazMart were in good condition and labeled as used oil.

- **Central Accumulation Areas (CAAs)**

USCG - EC manages hazardous waste in five CAAs: Building 77 Filter Bank Room, Building 77 Control Room, the HazMart, and Building 185 Annex. Each area was identified with a sign which read “danger, hazardous waste storage.” The CAAs are equipped with an internal communications or alarm system capable of providing immediate emergency instruction to facility personnel; they are equipped with a device capable of summoning emergency assistance from local police departments, fire departments, or state or local emergency response teams; they are equipped with portable fire extinguishers, fire control equipment, spill control equipment, and decontamination equipment; and they are equipped with water to supply water hose streams, or foam producing equipment, or automatic sprinklers, or water spray system. USCG - EC may manage ignitable and/or reactive waste in each CAA except for the 185 Annex CAA, and the inspectors observed “No Smoking” signs in these locations.

- Building 77 Filter Bank Room CAA

There were four unlabeled containers in this area that were recently replaced underneath four of the eight the blast media baghouses. These containers were empty (Photographs 20-21). Facility personnel labeled the containers during the inspection and dated them with the current date. There other four containers were labeled and were dated March 20, 2023 (D007) (Photographs 22-23). In the corner of this room was a container with vacuum affixed to the lid (Photograph 24). This SAA container was empty on the day of the inspection. The inspection team and the facility representatives discussed whether this vacuum system would be considered an SAA. The conclusion of the inspection team was that since it was a

container into which waste was placed, that was not reused in any way, which was at the point of generation, it would be considered an SAA.

- Building 77 Control Room CAA

The inspection team noted two 55-gallon containers labeled with dated accumulation start dates of 3/8/2023 and 3/16/2023 respectively (D007) in the Control Room CAA. These containers were in good condition attached to baghouses.

- Building 96 HazMart

The HazMart CAA is located immediately north of Building 96. The area is under a fixed roof and fully fenced with a locked entrance gate on the north side. The area is a paved asphalt storage area that uses covered plastic spill containment pallets (clam shells) to store 55-gallon containers of hazardous waste. The inspection team noted four gaylord boxes of waste filters and seven 55-gallon containers stored at the HazMart CAA which included aerosol cans, alodine wipes, solvent wipes POL wipes, sealants, and adhesives. The oldest accumulation start date on the day of the inspection was March 6, 2023. These containers were labeled, in good condition, and closed (Photographs 25-30).

The inspection team noted an area of concern. A compactor was observed in this area that used to compact waste solvent wipes for the purpose of reducing the number of containers shipped (Photographs 31-32). There was no active compaction occurring during the inspection. Activity of this nature, treatment of hazardous waste, is required to be conducted in compliance with a 40 CFR 262.17 exemption or under a RCRA hazardous waste permit. Specifically, this compaction unit operates with as an open container in the current orientation. The inspection team anticipates that some VOC containing emissions would occur during treatment. Capture of these emissions would be necessary to meet an exemption in 262.17.

- Building 87 ALC Paint Hanger CAA

The ALC Paint Hanger CAA abuts the east side of the Building 87. The CAA has a concrete floor approximately 11.5 feet by 19.5 feet with concrete curbed containment 4 inches in height and is under a fixed roof and secured by a full fence with a locked entrance gate. USCG – EC operates a paint can crusher in this area which was not operating during the inspection. Two cubic-yard containers of waste paint related material (D001/D007/F003) were present on the day of the inspection with an oldest accumulation start date of March 2, 2023 (Photographs 33-34). These containers were labeled, in good condition, and closed.

- Building 185 Annex CAA

USCG – EC stores full containers of cornstarch blast media on an uncovered concrete pad adjacent to the site hazardous waste permitted container storage area (Photograph 35). This

area is surrounded by fencing and access is through a locked gate. On the day of the inspection there were eighty (80) containers of cornstarch waste (D007). These containers were labeled, in good condition, closed, and stored with adequate aisle space. The oldest accumulation start date observed was February 3, 2023.

- Building 185 – Permitted Hazardous Waste Storage Area:

The hazardous waste storage area is approximately 75 feet long by 40 feet wide open-sided prefabricated building covering three monolithic concrete cells with continuous curbing around each cell. Each cell is 23 feet wide by 30 feet long and is permitted to hold up to forty-five containers or 2,250 gallons of waste per cell. The area is covered by a metal roof and surrounded by a locked gate. The wastes permitted for storage are D001, D002, D003, D005, D006, D007, D008, D009, D011, D018, D035, D036, D038, D039, D040, F001, F003, F005, U158, and U220.

Communication was available in the area including cell phones, an emergency phone to the fire house (confirmed to be working), and a fire alarm pull station. Emergency response equipment was observed including fire extinguishers, spill kits, a drum overpack, and an eye wash/emergency shower.

Unless otherwise noted, all containers were closed, in good condition, properly marked with the words hazardous waste and with the indication of the hazard(s), and had accumulation start dates ranging from 8/9/22 to 3/21/23. No spills were observed, and containers were not stacked, which is not allowed by the permit. A “No Smoking” sign was posted on the fence in this area.

The waste types observed on the day of inspection included: waste sealants and adhesives (D001/D007/D011/D018/D035), waste debris (cups, sticks, wipes, etc.) (D007/D035/F005), waste paint related materials (D001/D007/F003), waste aerosols (D001), alodine wipes (D007), waste filters (D007), shop vacuum dust (D006/D007), abrasive blast media (D007), methylene chloride paint stripper (D007/F002), and soldering waste (D008/D011) (Photographs 36 – 54).

The inspection team toured the permitted container storage area. On the day of the inspection, the inspection team noted that Cell 1 had exceeded its permitted storage capacity for this cell. There were 44 55-gallon containers and one 30-gallon container of waste present on the day of the inspection. This total volume is calculated as 2,450 gallons which exceeds the permitted amount for Cell 1 (Photograph 42).

$$(44 \times 55) + (1 \times 30) = 2,450 \text{ gallons (limit 2,250 gallons)}$$

Pursuant to Permit Condition Part III, the maximum storage capacity allowed is 2,250 per cell.

The inspection team noted dirt and grass clippings in the secondary containment of the permitted area. This is an area of concern for the inspection team. Debris in the secondary containment

could inhibit the Base staff from detecting a leak from one of the stored containers. Regular cleaning, when necessary, of the cells should be conducted (Photograph 39).

Pursuant to Permit Condition II.B, the permittee shall maintain and operate the facility to minimize the possibility of a fire, explosion, or any unpanned sudden or non-sudden release of hazardous waste constituents to air, soil, or surface water which could threaten human health or the environment.

On July 24, 2019, USCG-EC began noticing and documenting cracks in the secondary containment of the permitted storage area. Secondary containment has been reported as insufficient on each weekly inspection record since 2019 to present. The inspection team noted 13 unique cracks in the containment berm (Photographs 43-55). Evidence of some historic repairs to have been made without fully addressing the issue.

Pursuant to Permit Condition III.F, the Permittee is required to comply with the containment system found in 40 CFR 264.175(b)(1)-(5), adopted by reference at 15A NCAC 13A .0109. Pursuant to this regulation, the Permittee shall have a base which is free of cracks and gaps and is able to contain leaks, spills, and accumulated rainfall until such time that the material is detected and removed. Cracks identified as potential transmissive, shall be managed under normal maintenance and repair provision.

The inspection team noted one label did not include an accumulation start date (ASD) (Photographs 36-38). Facility personnel added the ASD while the inspectors looked on. This was an area of concern for the inspection team.

Pursuant to Permit Condition X.B.2, Land Disposal Prohibitions and Treatment Standards, the permittee is prohibited from storage of hazardous waste restricted from land disposal under 40 CFR 268 as adopted in 15A NCAC 13A .0112 unless the requirements of 40 CFR 268 Subpart E are met.

- Solid Waste Management Units (SWMUs) and Monitoring Wells (MWs):

The inspection team inspected the monitoring wells near Building 77, the Aircraft Stripping Area, including well locations 12MW6, 12MW21, 12MW27, and 12MW26. The outer plate on monitoring well 12MW21 was not secure in that the bolts were missing (Photograph 56). The inspection team did not inspect the actual well during the inspection. This was an area of concern. USCG – EC should regularly inspect each monitoring well to ensure security.

12) **Records Review**

The inspection team reviewed multiple records at the facility including the permit, the permit application, training, inspections, the waste analysis plan, job titles and descriptions, the contingency plan and QRG, closure plan, waste determinations, manifests and land disposal restriction notifications, and waste minimization plan.

Contingency Plan and Quick Reference Guide (QRG):

The actions that facility personnel should take in response to an emergency are described in the facility's Hazardous Waste Contingency Plan, which was last updated on April 27, 2022.

The plan 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. The plan describes arrangements agreed to with the local police department, fire department, other emergency response teams, emergency response contractors, equipment suppliers, local hospitals or the Local Emergency Planning Committee.

The plan lists the names and emergency telephone numbers for persons identified as emergency coordinators. Thomas Jethro and Michael Wenthe were listed as the primary emergency coordinators, and the other individuals are listed in the order in which they will assume responsibility as alternates. This list was not up to date. The inspection team was informed that these two were replaced by Nathaniel Stevenson and Chris Harris. The contingency plan nor the quick reference guide had been amended to reflect the current emergency coordinators.

The plan includes a list of all emergency equipment at the facility. The list includes fire extinguishing systems, spill control equipment, communications and alarm systems, and decontamination equipment. The list appears to be up to date. The plan includes the location and a physical description of each item on the list, and a brief outline of its capabilities. The plan includes an evacuation plan for personnel. This plan describes signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes.

A copy of the Hazardous Waste Contingency Plan (and its quick reference guide) was most recently submitted to the Base police and fire departments and the clinic in August 2020. Amendments to the plan were made after this most recent submission.

Permit Condition II.L.3, Amendments to Plan, the Permittee shall review and immediately amend, if necessary, the contingency plan, in accordance with 40 CFR 264.54 as adopted in 15A NCAC .0109 and shall provide documentation that the groups listed in 40 CFR 254.53(b) have received the revised copy of the contingency plan.

Pursuant to 15A NCAC 13A .0107(a) [40 CFR § 262.17(a)(6)], which incorporates [15A NCAC 13A .0107(i)] [40 C.F.R. § 262.262(c)], and is a condition of the LQG Permit Exemption, generators must update, if necessary, their quick reference guides, whenever the contingency plan is amended and submit these documents to the local emergency responders identified at paragraph (a) of this section or, as appropriate, the Local Emergency Planning Committee.

Training Records:

The inspectors reviewed facility job descriptions and employee names that were provided for Environmental Protection Specialist, Environmental Protection Assistant, Hazardous Waste Coordinator, Hazardous Waste Handler, and HazMart Pharmacy Supervisor. Each description

included the requisite skill, education, or other qualifications, and duties of facility personnel assigned to that position. USCG - EC provided a written description of the type and amount of both introductory and continuing training to be given to each person filling the positions listed above. The inspectors reviewed records of employee hazardous waste training completed in 2022.

Waste Manifest and Land Disposal Restriction (LDR) Records:

The inspectors reviewed available hazardous waste manifest records and land disposal restriction forms for shipments of hazardous waste sent from May 5, 2022, through March 1, 2023. There were no issues noted with the manifests.

Weekly Inspection Records:

The inspectors reviewed USCG - EC available records of inspections of the hazardous waste central accumulation area (CAA) since 2021. The inspection log includes a checklist to record observations about leaking containers and for deterioration of containers caused by corrosion or other factors. The inspection log includes a checklist to record observations ensuring containers are stored on pallets and not stacked, at least 2-feet of aisle space, limit each cell to 45 containers or 2,250 gallons, housekeeping, emergency communication, fire extinguisher, spill response kit, and empty drums, removal of excess debris and rainwater, ensuring time limits were not exceeded, and that each container was labeled among other things. The records do include the date but not the time of the inspection; the records included the name, signature and initials of the employee conducting the inspection. Employees do routinely record inspection observations but do not record subsequent follow-up actions on the inspection log. USCG Base – Elizabeth City is in violation of their permit due to failure to remedy the issues noted on the inspection form and in that the inspection form used to document weekly inspections in the TSDF did not include the time of the inspection.

Pursuant to Permit Condition II.F, General Inspection requirements, The Permittee shall follow the inspection schedule as described in Section F-2 of the Attachment and shall comply with 40 CFR 264.15(c) and (d) as adopted in 15A NCAC 13A .0109.

Pursuant to 15A NCAC 13A .0109 [40 CFR § 264.15(c and d)], (c) the owner or operator must remedy any deterioration or malfunction of equipment or structures which the inspection reveals on a schedule which ensures that the problem does not lead to an environmental or human health hazard. Where a hazard is imminent or has already occurred, remedial action must be taken immediately and (d) the owner or operator must record inspections in an inspection log or summary. He must keep these records for at least three years from the date of inspection. At a minimum, these records must include the date and time of the inspection, the name of the inspector, a notation of the observations made, and the date and nature of any repairs or other remedial actions.

Permit Condition III. D Inspections, the permittee shall inspect container storage area in accordance with 40 CFR 264.174 and adopted in 15A NCAC 13A .0109 and as described in Table F-1 of the attachment.

13) **Closing Conference**

The inspectors conducted the exit meeting at 6:50 p.m. with Leilani Woods and Chris Dunn. During this meeting, the inspectors stated their preliminary conclusions of the inspection. USCG - EC agreed to provide updated training records within two weeks of the inspection. On March 28, 2023, Leilani Woods provided training records, waste analysis records, updated inspection checklists, documentation on the first day cracks were noted in the permitted container area, and hazardous waste properties table in an email to Alan Newman and Andrea Stermer.

14) **List of Appendices**

Appendix 1 – Photo Log:

15) **Signed**

ALAN NEWMAN Digitally signed by ALAN NEWMAN
Date: 2023.05.18 15:02:02 -04'00'

Alan Newman
Environmental Engineer

16) **Concurrence**

ARACELI CHAVEZ Digitally signed by ARACELI CHAVEZ
Date: 2023.05.18 16:38:55 -04'00'

Araceli B. Chavez
Chief
RCRA Enforcement Section

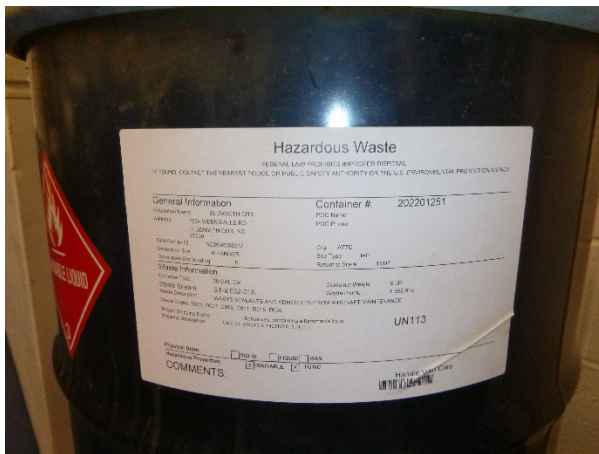
Appendix 1

Photograph Log:

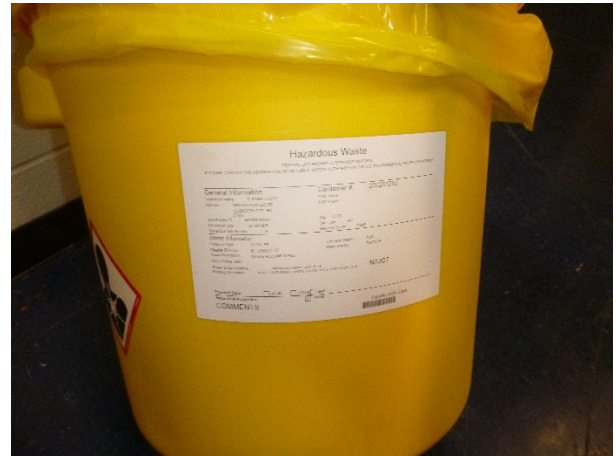
Photographs taken by Alan Newman
Photographs taken with Lumix Digital
EPA Property Tag: S75870



Photograph 1: Base SAA.



Photograph 2: Base SAA.



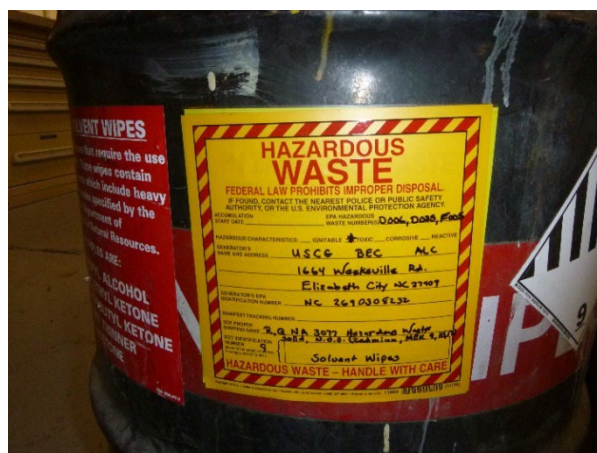
Photograph 3: Base SAA.



Photograph 4: Base SAA.



Photograph 5: Base SAA.



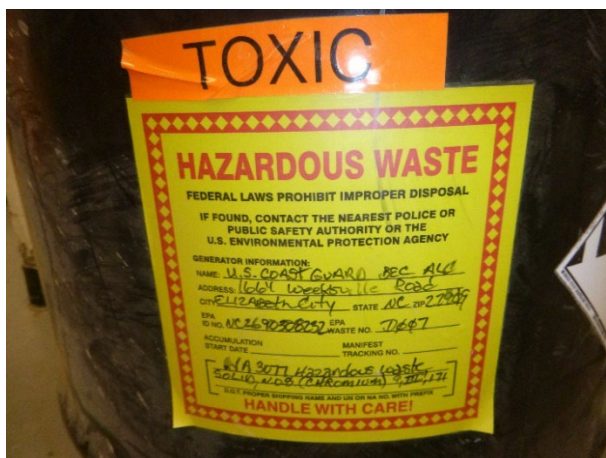
Photograph 7: Base SAA.



Photograph 6: Base SAA.



Photograph 8: Base SAA.



Photograph 9: Base SAA.



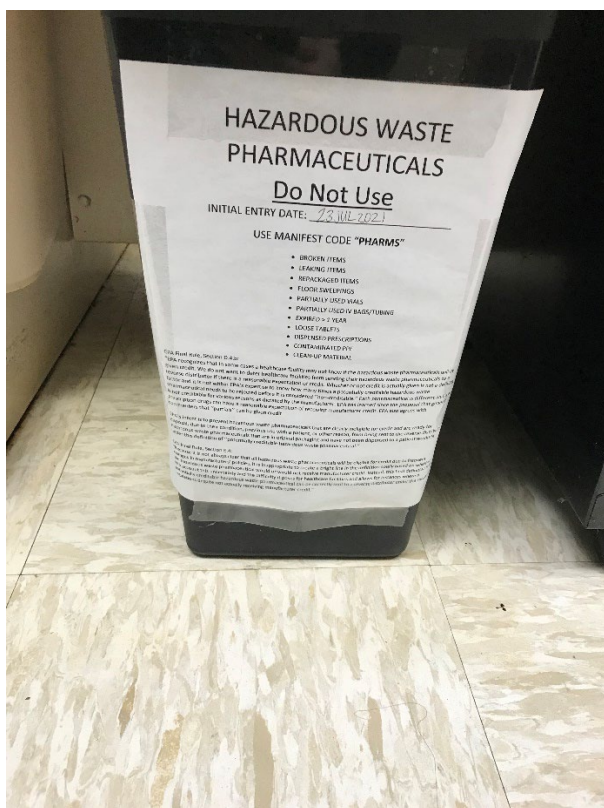
Photograph 10: Building 77 Hanger SAA.



Photograph 11: Building 77 Hanger SAA.



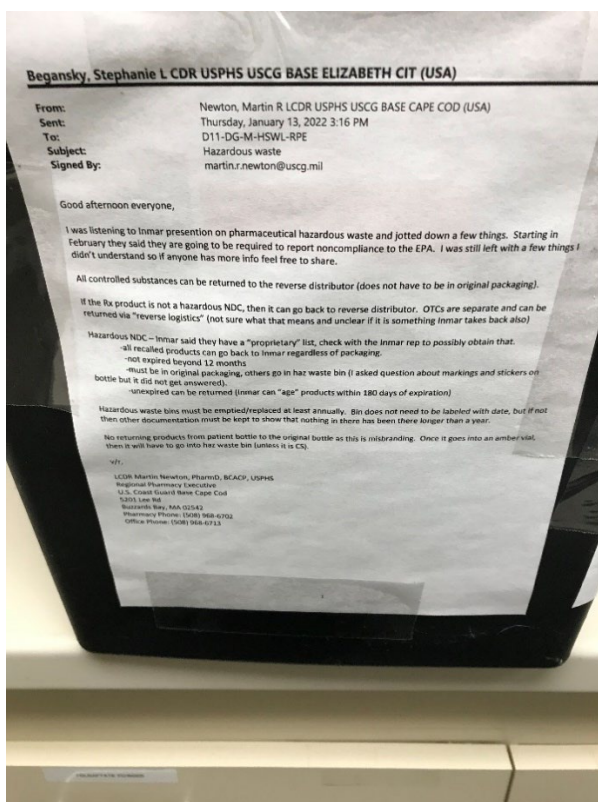
Photograph 12: Subpart P Pharmaceuticals.



Photograph 13: Subpart P Pharmaceuticals.



Photograph 15: Subpart P Pharmaceuticals EPI pens.



Photograph 14: Subpart P Pharmaceuticals.



Photograph 16: Potentially credible pharmaceuticals.



Photograph 17: Amalgam recovery system.



Photograph 19: Building 1 Container dated 3/30/2022.



Photograph 18: Universal Waste Lamps.



Photograph 20: Building 77 Filter Bank Room



Photograph 21: Building 77 Filter Bank Room.



Photograph 22: Building 77 Filter Bank Room.



Photograph 23: Building 77 Filter Bank Room..



Photograph 24: Building 77 Filter Bank Room..



Photograph 25: HazMart CAA.



Photograph 26: HazMart CAA.



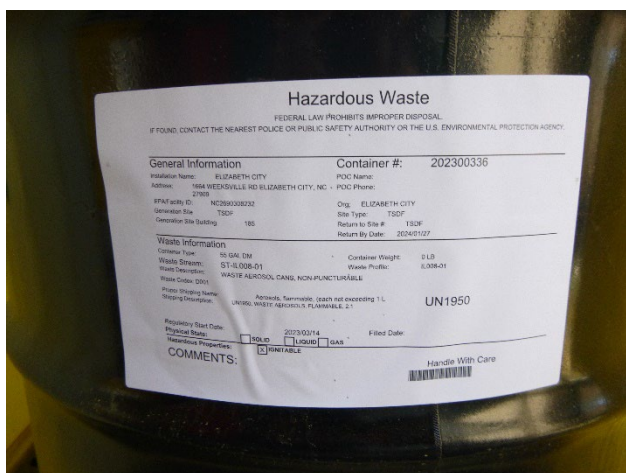
Photograph 29: HazMart CAA.



Photograph 27: HazMart CAA.



Photograph 30: HazMart CAA.



Photograph 28: HazMart CAA .



Photograph 31: HazMart CAA Compactor.



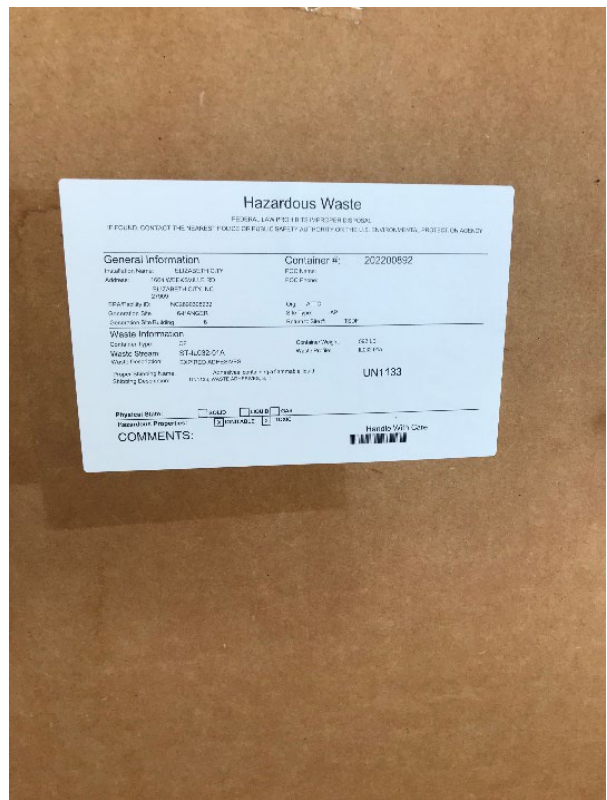
Photograph 32: HazMart CAA Compactor.



Photograph 35: Building 185 Annex CAA.



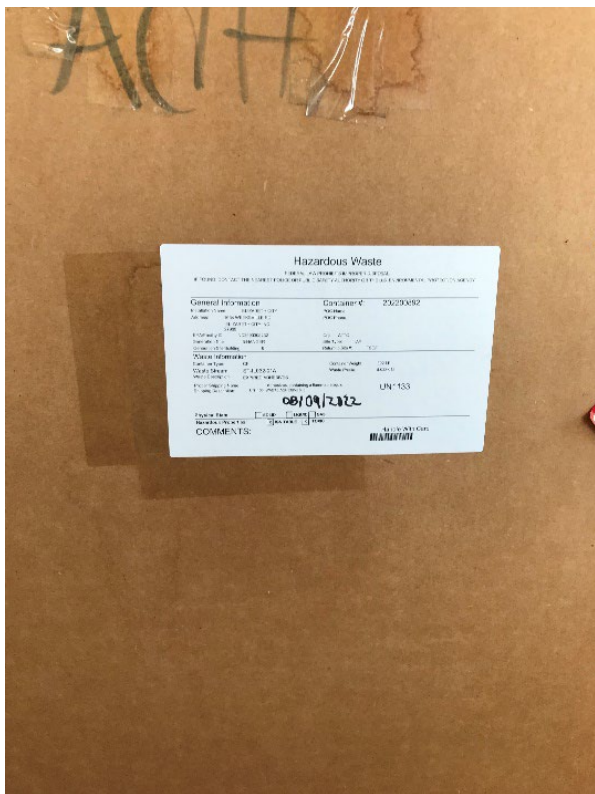
Photograph 33: Hazmart CAA compactor.



Photograph 36: Permitted Storage Area.



Photograph 34: Building 87 CAA.



Photograph 37: Permitted Storage Area.



Photograph 38: Permitted Storage Area.



Photograph 39: Permitted Storage Area.



Photograph 40: Permitted Storage Area.



Photograph 41: Permitted Storage Area.



Photograph 42: Permitted Storage Area.



Photograph 45: Permitted Storage Area.



Photograph 43: Permitted Storage Area.



Photograph 46: Permitted Storage Area.



Photograph 44: Permitted Storage Area.



Photograph 47: Permitted Storage Area.



Photograph 48: Permitted Storage Area.



Photograph 51: Permitted Storage Area.



Photograph 49: Permitted Storage Area.



Photograph 52: Permitted Storage Area.



Photograph 50: Permitted Storage Area.



Photograph 53: Permitted Storage Area.



Photograph 54: Permitted Storage Area.



Photograph 55: Permitted Storage Area.



Photograph 56: Monitoring Well.