# RCRA Compliance Evaluation Inspection Report

## 1) Inspector and Author of Report

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## 2) Facility Information

Maxwell Air Force Base
400 Cannon Street Winton
Montgomery, Alabama 36112
Montgomery County
(334) 244-7533

EPA ID No.: ALR0570024182

## 3) Responsible Officials

Greg Rollins, Director, 42d Civil Engineer Squadron, Maxwell Air Force Base

## 4) Inspection Participant

Jon Sawyer, Maxwell Air Force Base
Jared Kennington, Maxwell Air Force Base
Sarah N. Bethea, Alabama Department of Environmental Management
Raj Aiyar, U.S. EPA, Region 4

## 5) Date and Time of Inspection

April 21, 2021, 10:00 a.m.

## 6) Applicable Regulations

Resource Conservation and Recovery Act (RCRA) Sections 3002, 3004, 3005, 3007 and 3008, (42 U.S.C. §§ 6922, 6924, 6925, 6927 and 6928);

40 Code of Federal Regulations (C.F.R.) Parts 260-266, 270, 273, 279

Alabama Hazardous Waste Management and Minimization Act of 1978. Ala code Regulations §

22-30-1-17-1 et seq., and rulbaes35-14-1 to 335-14-17 (2016 and 2018) of the Alabama Department of Environmental Management (ADEM) Administrative Code (ADEM Admin. Code).

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

On April 21, 2021, inspectors from the U.S. Environmental Protection Agency, Region 4, and the Alabama Department of Environmental Management (ADEM) conducted an announced compliance evaluation inspection (CEI) at Maxwell Air Force Base, (hereinafter, "MAFB" or the "facility") to determine its compliance status with the RCRA and the State of Alabama regulations.

## 8) Facility Description

MAFB is located at 400 Cannon Street, Montgomery, Alabama. It is owned by the United States Department of Defense and is operated by US Air Force. The facility was established in 1910 as the Wright Flying School and is located on approximately 2500 acres. The base is the headquarters of Air University, a major component of Air Education and Training Command (AETC). The facility is also responsible for repair and maintenance of C-130 aircrafts.

The facility's waste is managed through the Defense Logistics Agency (DLA) Disposition Services which includes hazardous waste and universal waste. The DLA is a combat defense logistics agency that manages the global supply chain, from raw materials to end user to disposition for the Department of Defense.

MAFB was inspected as a large quantity generator (LQG) of hazardous waste. All the hazardous waste generated onsite including waste paint (liquid), paint residue solids, waste aircraft sealants, waste bead blast media and waste rags are picked up by the DLA contractor and transported to a treatment storage and disposal (TSD) facility. The activities that generate hazardous waste includes parts cleaning, aircraft maintenance, aircraft cleaning and other hazardous waste generated including pharmaceutical waste and motor pool maintenance. The facility uses Clean Earth of Alabama (EPA ID# ALD9811020894) to pick up their hazardous waste and Tri-State Government Services (EPA ID# TNR000021550) as transporter. Besides Clean Earth of Alabama, other TSDs used by MAFB includes Tradebe Treatment and Recycling of Tennessee LLC (EPA ID# TND000772186) and US Ecology Sulligent Inc. (EPA ID# ALD983177015).

The universal waste including fluorescent lamps are picked up by Lamp Environmental Industries (LAR000055467). The facility uses Universal Environmental Services, LLC (EPA ID# GAR000020131) to pick up their used oil, used oil filters, anti-freeze, and brake fluids. MAFB recycles their scrap metals and used tires. G&K Services launders their shop towels. Used Batteries are recycled by Coastal Recycling, LLC. The City of Montgomery supplies the

potable water and provides domestic waste service. The facility has its own fire department on site. According to the facility personnel, the fire department has an agreement with the local Montgomery fire department for backup and assistance, as required.

**9) Previous Inspection History**

MAFB was last inspected by ADEM and U.S. EPA on May 15, 2019. No deficiencies were observed at the time of the inspection.

**10) Findings**

Inspectors arrived at the facility at 10:00 a.m. and were greeted by the facility personnel at the Maxwell Visitor Center. From there, we were escorted to the Civil Engineering Building where the environmental offices are located. The inspectors conducted a formal introduction, showed their credentials and explained the purpose of the visit. Mr. Jon Sawyer, Environmental Department Chief and Jared Kennington, Contract Office Representative, provided the inspectors a general description of the on-site activities at the facility. The inspectors were later accompanied by Mr. Sawyer and Mr. Kennington during the walk-through inspection of the facility.

Building 267 - Less than 90-day Hazardous Waste Storage Area

The less than 90-day hazardous waste storage area is in Building 1057. It is a separate building with a sign at the entrance indicating the building use (Picture-1). The storage area was equipped with fire protection equipment, spill control equipment, safety shower, phones for communication, and a sprinkler system. The storage area inside the building is separated into various designated areas. Each area is designated for segregating several types of waste streams that are generated on a normal basis. The waste streams stored in the less than 90-day storage area includes flammables, corrosives, universal waste, nonregulated waste, containers containing waste pending analysis, universal waste and used oil.

The inspectors observed 24 used oil containers stored on pallets (Picture-2). The used oil was observed to be stored in 30-gallon and 55-gallon containers. All the containers were observed to be closed and labeled. There were no leaks or spills observed on the floor. The inspectors observed five 4-foot and one 6-foot spent fluorescent lamp boxes stored on pallets in the universal waste bay (Picture-3). One 4-foot spent fluorescent box was observed to be labeled as universal waste. The other spent fluorescent boxes were handwritten as universal waste. All the boxes were observed to be closed. The oldest accumulation start date on the universal waste box was observed to be 06/09/2020.

In the hazardous waste designated storage area, the inspectors observed two 55-gallon container, one 30-gallon container and one 10-gallon overpack containers (Picture-4). In the same area, the inspectors observed nine 47-gallon containers and two 125-gallon overpack containers (Picture-5). All nine containers including the overpack containers had a label indicating “Container on Hold Pending Analysis”.

The inspectors observed that there was no aisle space in the area where the hazardous waste was stored including the containers marked as pending analysis (Picture-6). The inspectors had

difficulty accessing hazardous waste containers stored at the rear of the storage area. However, the containers were observed to be closed and labeled. The oldest accumulation start date on the container was observed to be 01/20/2021. The hazard indication on the drums were observed to be "Flammable". Pictures showing adequate aisle space in the storage building was sent via email on May 21, 2021 to the inspectors indicating that the facility had returned to compliance.

**Pursuant to ADEM Admin. Code r. 335-14-3-.03(5)(a) [40 C.F.R. § 262.34(a)], a generator of 1,000 kilograms or greater of hazardous waste in a calendar month is a Large Quantity Generator (LQG) and may accumulate hazardous waste on-site for 90 days or less without a permit or without having interim status, as required by Section 22-30-12(b) of the AHWMMA, Ala. Code § 22-30-12(b) [Section 3005 of RCRA, 42 U.S.C. § 6925], provided that the generator complies with the conditions listed in ADEM Admin. Code r. 335-14-3-.03(5)(a)1.-6. [40 C.F.R. § 262.34(a)(1)-(4)] (hereinafter referred to as the "LQG Permit Exemption").**

**Pursuant to 40 C.F.R. § 262.16(b)(8)(v)], which incorporates [ADEM Admin. Code r. 335-14-6-.03(6)] [40 C.F.R. § 265.35], and is a condition of the LQG Permit Exemption, a generator is required to maintain aisle space to allow the unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment to any area of facility operation in an emergency, *unless* aisle space is not needed for any of these purposes.**

The inspectors observed three additional 55-gallon drums containing hazardous waste in the same area. The drums were observed to be closed, labeled and dated. The hazard indicator on the drums was observed to be Class 9 Miscellaneous. The waste codes on the drums were noted to be D006 and D007, respectively. The oldest accumulation start date on the drum was observed to be 04/15/2021.

Mr. Sawyer provided information via email on May 21, 2021, indicating that the nine 47-gallon poly drums and the two 125-gallon overpacks contained fuel contact water. According to Mr. Sawyer, MAFB had analyzed the fuel contact water and determined it to be nonhazardous. Mr. Sawyer also confirmed that they had received approval from ADEM to recycle the fuel contact water. Mr. Sawyer mentioned that the source of the fuel contact water was from a crash site involving two military aircrafts near the Alabama State line that MAFB Emergency Response Team were requested to respond from Washington DC.

Adjacent to the poly drums and the overpacks, the inspectors observed spent lead-acid batteries (aircraft batteries, automotive batteries) stored on pallets for recyling (Picture-7). The inspectors did not observe any leaks, spills or damage to the batteries that could cause leakage to the environment. The inspectors observed five 10-gallon and two 30-gallon containers of universal waste (spent lithium batteries, spent alkaline batteries and oxide batteries). The containers were observed to be dated and closed. The oldest accumulation start date on the container was observed to be 07/15/2020. The containers were observed to be intact and non-leaking.

The next area inspected was the corrosive room (Picture-8). The inspectors observed three 55-gallon hazardous waste drums containing corrosive waste (D002) stored in this area. The drums

were observed to be closed, labeled with hazard indication and dated. The oldest accumulation start date on the drum was observed to be 01/22/2021. There was no evidence of leaks or spills observed in this area. Adjacent to the corrosive area, the inspectors observed an area designated for storing non-regulated waste. The inspectors observed seven containers containing non-regulated waste on pallets. All the containers were observed to be closed and labeled as non-regulated waste. No deficiencies were observed in this area.

Building 1456

Building 1456 comprises of a prop shop, aircraft maintenance including painting and aircraft hydraulic work. The inspectors observed several Satellite Accumulation Areas (SAAs) in this building. The drums in the SAAs were observed to be labeled, closed and with hazard indication. All the SAA drums were also observed to be staged on spill pallets. There was no evidence of leaks or spills near the drums.

The inspectors observed a small, yellow, roll-top station that contained two 55-gallon drums used for storing used oil in the Prop shop (Picture-9). Both the drums were observed to be closed and labeled as "used oil". The inspectors inspected the aircraft painting area. There was no painting nor blasting activity in the building at the time of inspection. The inspectors observed one SAA drum inside the blast media room. The drum was observed to be closed, labeled and with a hazard indication. The other SAA drum was located outside the building connected to a baghouse collecting the spent blast media. The drum was observed to be labeled with a hazard indication. There was no evidence of leaks and spills near the drum. The inspectors observed that the building was equipped with fire extinguishers, eye wash station and spill kits.

Building 1454

Building 1454 houses a fuel shop where hazardous waste is generated. The inspectors observed two 55-gallon drums on a spill pallet (Picture-10). One of the drums was observed to be labeled as "Hazardous Waste", the other drum was labeled as non-regulated waste. Both the drums were observed to be closed, intact and non-leaking. The hazard identification on the hazardous waste drum was observed to be Class 9 Miscellaneous. The waste codes on the hazardous waste drum were observed to be D001 and D007. The inspectors observed that the building was equipped with fire extinguishers, eye wash station, and spill kits.

Motor Pool and Transportation Building

All emergency equipment and vehicles are serviced in this building. Used oil and waste paint waste are generated as the bulk waste in the building. The inspectors observed one 1000-liter used oil tank labeled as "Used Oil" located in the far end corner of the building (Picture-11). According to Maintenance Manager, Mr. Hudson, the containment is provided by double-walled construction and the transfer operations are conducted by flexible hoses. In addition, the inspectors observed several 55-gallon used oil containers on a spill pallet. The containers were observed to be closed and labeled as used oil. There was no leaks or spills observed near the used oil tank and the containers. The inspectors observed that the building was equipped with fire extinguishers and spill kits.

The inspectors observed two 55-gallon drums in two SAA adjacent to the paint area. Both the drums were observed to be closed and labeled as "Hazardous Waste". The hazard indication on both the SAA drums were observed to be "Flammable Liquid". According to Mr. Hudson, there was very little painting activity in the building and the painting activity was limited to giving paint touch-up to automotive parts. The inspectors observed that there was no painting activity in the building during the inspection.

## 12) Record Review

The records review included the following:

- Hazardous Waste Manifests 2019 - Present
- Weekly Inspection Logs June 2020 - Present
- Integrated Contingency Plan (ICP) 2019
- Waste Profiles
- Quick Reference guide and documents showing arrangements with fire, police and hospital - These records were not available at the time of inspection; however, copies of records were provided via email dated May 21, 2021. According to Mr. Sawyer, MAFB has their own police, fire and emergency management departments and they have access to current ICP via electronic SharePoint. In order to ensure that local emergency responders would support MAFB in the event of an emergency, copies of ICP were sent to responders again. In addition, ICP copies were mailed via FedEx to local hospitals in Montgomery, Alabama and to ADEM Field Operations Offices.

- Personnel Training – Some training records were provided during the inspection and additional training records were later provided to the inspectors via email on May 20, 2021. Based on the review of the training records, minor deficiencies were observed during the records review. **This is an Area of Concern. All facility personnel must take part in an annual review of the initial training required by this section and the generator must maintain training records on site made available onsite during the inspection.**
- With the exception of the Quick Reference guide and personnel training, all other records appeared to be complete at the time of inspection.

## 13) Out-Briefing

An exit briefing was conducted at the conclusion of the inspection. Mr. Rollins, Mr. Sawyer and Mr. Kennington participated in the exit briefing. The observations made during the inspection were discussed and the inspection was concluded.

## 14) Signed

RAJAGOPAL AIYAR Digitally signed by RAJAGOPAL AIYAR
Date: 2021.06.04 13:37:25 -04'00'

Raj Aiyar
Environmental Engineer

Date

**15) Concurrence**

ARACELI CHAVEZ Digitally signed by ARACELI CHAVEZ
Date: 2021.06.04 09:21:32 -04'00'

Araceli Chavez
Chief
RCRA Enforcement Section

Date

**Attachment A**

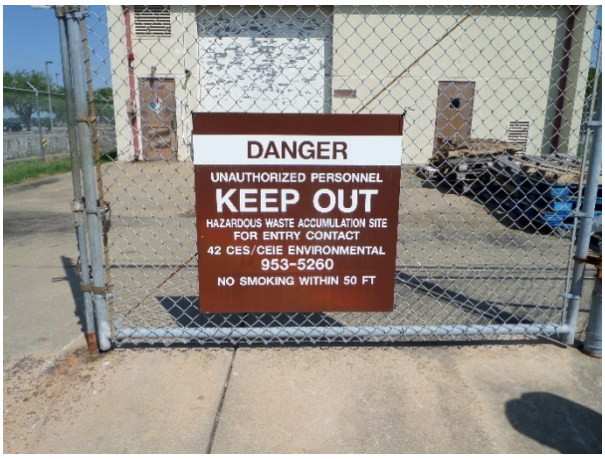
**MAXWELL AIR FORCE BASE**

**Montgomery, Alabama**

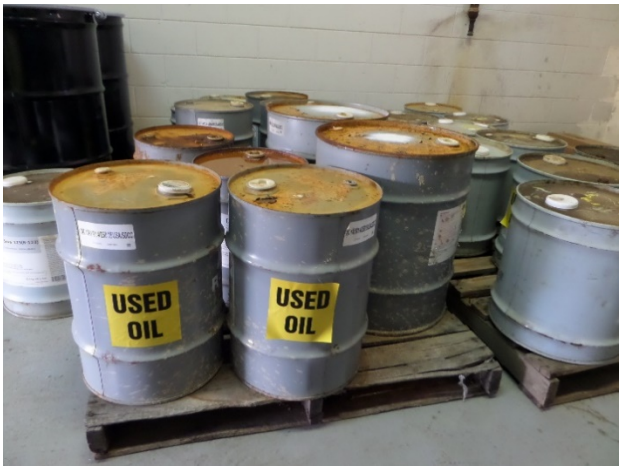
**EPA ID # AL0570024182**

**APRIL 21, 2021**

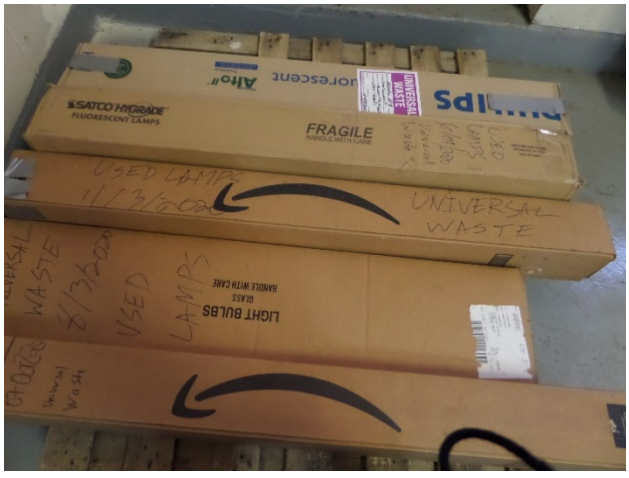
**Photos taken by Raj Aiyar**
**Camera Type: Samsung WB250F**
**EPA Tag Number: S75912**




*Picture 1: Building 261,* Less than 90-day Hazardous Waste Storage Area




*Picture 2: Used Oil Containers on Pallets*

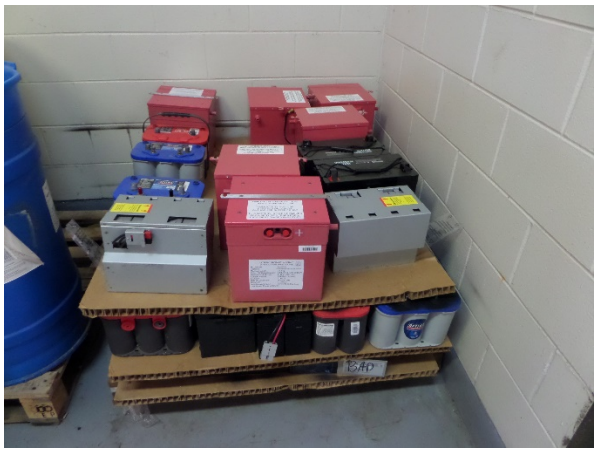



*Picture 3: Spent Fluorescent lamps (Universal Waste)*

*Picture 4: Hazardous Waste in Storage*

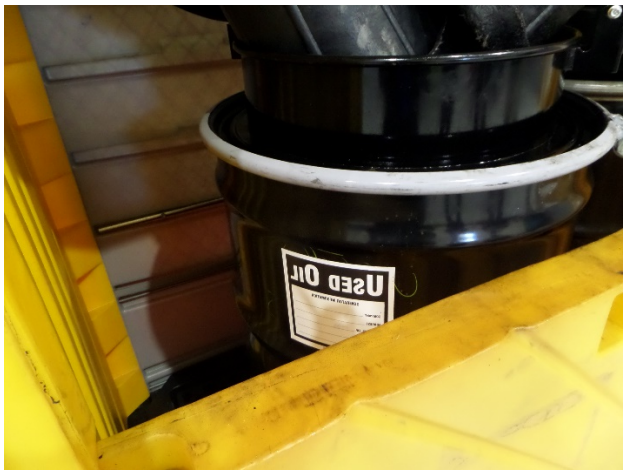
*Picture 5: Containers on Hold Pending Analysis*

*Picture 6: Lack of Aisle Space in Storage*

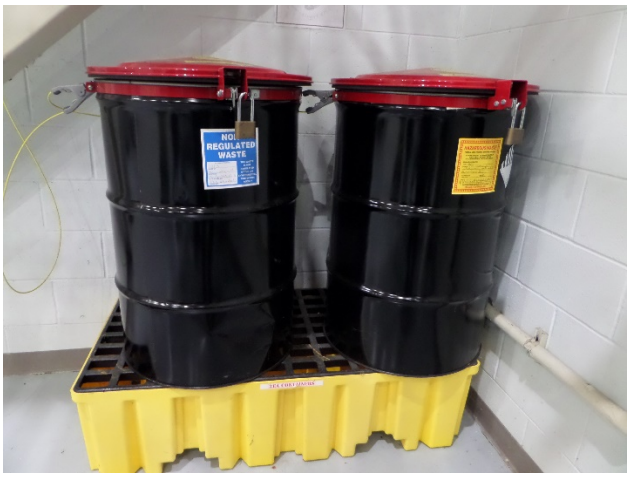


*Picture 7: Spent Batteries stored for Recyling*

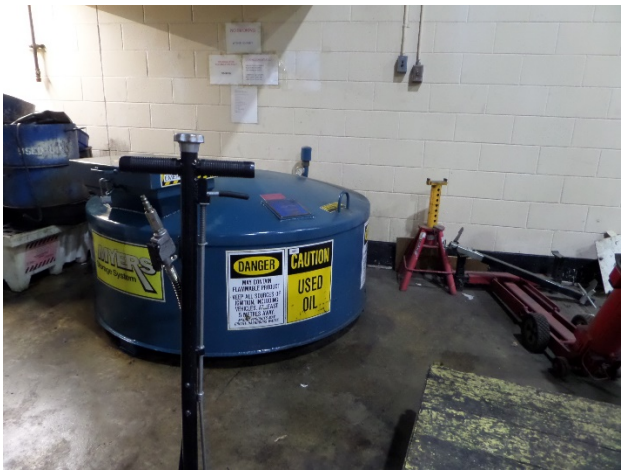

*Picture 8: Corrosive Waste in Storage*




OBJ *Picture 9: Used Oil Storage in Prop Shop*




*Picture 10: SAA in Building 1454*




*Picture 11: Used Oil Tank in Motor Pool Building*