

RCRA Compliance Evaluation Inspection Report

1) **Inspector and Author of Report**

Parvez Mallick
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U.S. Environmental Protection Agency – Region 4
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2) **Facility Information**

Seymour Johnson Air Force Base
1711 Goodson Street
Bldg. 2025
Seymour Johnson AFB, NC 27531
County: Wayne
Latitude: 35.349475
Longitude: 77.968849
EPA ID Number: NC7570024474

Primary NAICS – 928110 – National Security
SIC Code - 9711 – Public Administration – National Security

3) **Responsible Official**

Daniel J. Mayette, Hazardous Waste Manager
Office: 919-722-7447
Daniel.Mayette@us.af.mil

4) **Inspection Participants**

Parvez Mallick, US EPA Region 4
Andrea L. Stermer, Environmental Specialist II, NCDEQ
Dan Girdner, Environmental Specialist II, NCDEQ
Daniel J. Mayette, Hazardous Waste Manager, Seymour Johnson AFB
Ernesto Gonzalez-Santiago, Environmental Technician, Bhate Environmental Associates, Inc.
(Bhate)

5) **Dates of Inspection**

February 25, 2021, 8:30 a.m.

6) **Applicable Regulations**

Subtitle C of the Resource Conservation and Recovery Act (RCRA) (42 U.S.C. §§ 6921 – 6939f), 40 Code of Federal Regulation (C.F.R.), Parts 260 - 270, 273 & 279, and NCHWMR, 15A NCAC 13A .0101 to .0119. Hazardous Waste Management Corrective Action Permit No. NC7570024474R2.

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 Compliance Evaluation Inspection**

On February 25, 2021, Andrea Stermer and Dan Girdner, North Carolina Department of Environmental Quality (NCDEQ), and Parvez Mallick, EPA Region 4, conducted an announced compliance evaluation inspection (CEI) of Seymour Johnson Air Force Base (SJAFOB or the facility) to determine the facility's compliance with state and federal hazardous waste regulations. This was an EPA lead joint inspection. SJAFOB was represented by Daniel J. Mayette, Hazardous Waste Manager and Ernesto Gonzalez-Santiago, Environmental Technician. Upon entering the facility, the inspectors introduced themselves, showed their credentials and explained the purpose of the visit and a description of the facility's process was discussed.

8) **Facility Description**

Seymour Johnson Air Force Base is one of the largest fighter wings in the Air Force, consisting of nearly 6,000 airmen and civilians and home to F-15, which are assigned to two operational and two training fighter squadrons. SJAFOB has served as an Overseas Replacement Training Center since 1943 and is home to a Technical School and an Army Air Forces Technical Training Command. Water and sewer service for the base are provided by the City of Goldsboro. There are no drinking water wells onsite. There is an extensive array of groundwater monitoring wells onsite. The facility's stormwater permit covers municipal, industrial, construction, vehicle maintenance, and airport operations related stormwater.

The SJAFOB has notified NCDEQ as a large quantity generator (LQG) of hazardous waste since November 19, 1980. The most recent notification was submitted on January 8, 2020. SJAFOB has also been issued a Hazardous and Solid Waste Amendments (HSWA) Corrective Action Permit No. NC7570024474R2. The permit was originally issued on April 20, 2004. The current permit was issued on September 24, 2015 and expires on September 24, 2025. At the time of inspection, the base was operating as an LQG.

SJAFOB has one 90-Day/Central Accumulation Area (CAA) and fifty-four Satellite Accumulation Areas (SAAs) of which thirty-three contain hazardous waste. Hazardous wastes are generated primarily from the maintenance of aircrafts and vehicles, operation of the flight line, and munitions.

The facility's most recent Biennial Report submitted to NCDEQ on January 8, 2020, characterized the facility as a LQG of hazardous waste, generating the following hazardous wastes:

Waste Description:	EPA Waste Codes
Hazardous waste, liquid (aqueous parts cleaner)	D007, D010
Hazardous waste, solid (cadmium)	D006
Hazardous waste, solid (cadmium, chromium, lead)	D006, D007, D008
Hazardous waste, solid (lead)	D008
Hazardous waste, solid (methyl ethyl ketone)	F002, D035, F003, F005
Hazardous waste, solid (MEK, xylene, toluene, methylene chloride, chromium)	D035, F002, F003, F005, D007, D006
Waste adhesives	D001, D035
Waste aerosols, flammable	D001, D035
Waste combustible liquid (petroleum naphtha)	D006, D008
Waste flammable liquids (naphtha, isopropanol)	D001
Waste flammable solids, organic (gasoline, diesel)	D001, D018
Waste paint related material	D001, D035, F003, F005
Waste paint related material	D001, D007, F003, F005
Waste sodium hydroxide solution	D002, D008
Waste toxic, liquids organic (methylene chloride, chromium)	D007, F002

General Information:

- Legal owner of facility: United States Department of Defense;
- Legal owner of property: United States Department of Defense;
- Number of Employees/Shifts: ~10,000-11,000 personnel (~6,000 military);
- Water supply (municipal or well): Municipal (City of Goldsboro)
- Municipal sewer/septic: Municipal (City of Goldsboro)/No septic;
- Number of on-site wells: Unknown;
- Distance to closest off-site well: Unknown;
- Closest private residence: Less than ¼ mile; and
- Site Acreage: 3,220 acres.

9) Inspection Findings

A walk-through inspection of the facility was performed with the SJAFB representatives. The walk-through of the base focused on selected solid waste management units, SAAs, and the CAA. Below is a description of the observations made in the various areas of the facility inspected.

The following SAAs were inspected during the inspection:

Building 2025 – CAA

- #31 – one 30-gallon container of punctured aerosol can residues.

Building 4717 – POD Maintenance

- #27 – one 35-gallon container of contaminated wipes (D006) and a 5-gallon container of contaminated wipes (D007).

Building 4735 – Fuel Cell Maintenance

- #21 – one 5-gallon container of adhesive with methyl ethyl ketone (D001/D035).

Building 4711 – Hydraulic Shop

- #40 – one 55-gallon container of contaminated wipes (D006).

Building 2154 – Armament

- #48A – one 30-gallon container of bead blast media (D006/D007) and a 5-gallon container of contaminated wipes from cleaning guns (D008); and
- An aqueous parts washer is also used in this area that is managed as hazardous waste with Safety Kleen (D006/D008).

Building 2151 – NDI

- #62 – one 30-gallon container of contaminated wipes (D006).

Building 2156 – Structural Maintenance

- #50 – one 30-gallon container of paint-related material (F002/D006).

Building 4500 – Wheel & Tire

- #11 – one 55-gallon container of spent blast media (D006/D008); and
- #11A – one 30-gallon container of skimmer solids from an aqueous parts washer (D006).

During the inspection, all hazardous SAA containers were observed to be at or near the point of generation and under control of the operator, containers were closed, marked with the words “Hazardous Waste,” had an indication of the hazard(s) of the contents of the containers. The containers did not exceed 55-gallons of waste in any SAA and containers were in good condition.

Building 2025 - Central Accumulation Area (CAA)

The CAA is a fenced, covered area with a concrete floor. Hazardous waste is collected base-wide by Bhate Environmental Associates, Inc. (Bhate) personnel, Mr. Ernesto Gonzalez-Santiago. Emergency equipment includes spill kits, eye wash station, emergency shower, ABC fire extinguishers, fire alarm, and absorbent materials. A telephone and megaphone were available for communication. The inspector observed a “No Smoking” sign on the CAA building.

An electronic inventory of waste accumulating in the CAA is maintained that is sent to the Hazardous Waste Manager and base fire department daily. There were approximately twenty-four containers of hazardous waste observed in the CAA that ranged from 1-gallon to 55-gallons in size, all in secondary containment. The CAA included the following wastes: Alodine, blast media, cleaners, flammable adhesives, paint-related materials, solid waste contaminated with lead, solid waste contaminated with chromium, solid waste contaminated with gas and diesel fuel, solvent contaminated wipes, waste Alodine, waste aerosol cans, waste flammable adhesive, and waste paint and related material.

All CAA containers were closed, properly marked with the words “Hazardous Waste,” with the indication of the hazard(s), and had accumulation start dates ranging from 1/5/21 to 2/23/21. The containers were in good condition, with adequate aisle space and no spills were observed on the floor during the inspection. The inspectors observed that the CAA was coated without any cracks.

The inspectors observed the following universal waste containers in the CAA:

- One-cubic yard container of universal waste lamps;
- Six 14” by 14” containers of universal waste batteries;
- One container of universal waste HID lamps;
- One 4-foot container of universal waste lamps;
- One 8-foot container of universal waste lamps; and
- One pallet of universal waste lead-acid batteries.

All universal waste containers were structurally sound, closed, marked “Universal Waste”, and had an accumulation start date ranging from 8/31/20 to 2/16/21 during the inspection.

There was a 5-gallon container of universal waste batteries dated 12/11/20 in the Building 4735 – Fuel Cell Maintenance.

Used Oil

One 5,000-gallon above ground double walled tank of used oil was observed outside of Building 2025 during the inspection. The tank was closed and marked “Used Oil.”

One 55-gallon container of used oil in a clamshell structure was observed outside of Building 2154 – Armament. The container was closed and marked “Used Oil.”

The inspectors observed that emergency communication is available in all the satellite accumulation and central accumulation areas including cell phones and two-way radios. Emergency equipment observed included fire extinguishers, spill kits, and eye wash/shower stations.

Records Review

Personnel Training – Review of RCRA training documentation, included job title and name of the employee filling the position, job descriptions, type and amount of introductory and continuing training required, and proof that training has been completed as required found no issues. Base personnel with hazardous waste responsibilities are trained in hazardous waste handling through a web-based training program. Bate staff that manages the base’s CAA also received annual training and an annual review of the facility’s Contingency Plan. Training records for everyone involved in hazardous waste management were provided and hazardous waste management training for each staff member is up to date.

Contingency Plan (CP) – The facility maintains a copy of a dedicated “RCRA Contingency Plan” which fulfills the permit requirements, SAAs, CAA and was last updated on January 5, 2021. The plan included a list of emergency coordinators: Primary Emergency Coordinator Sean Quinby–Fire Chief; First Alternate was listed as Robert Klinger – Assistant, Fire Chief, and Second Alternate as Nicholas Swope – Deputy Fire Chief. Emergency contact numbers for each person was listed. Included in the Contingency Plan was a description of the signal used to begin

evacuation of the base, which is to broadcast “Evacuate Facility” over the PA system and/or fire alarm activation; a physical description of the emergency equipment used at the CAA in the event of an emergency with the location of the equipment and a brief description of the capabilities; a description of the primary and secondary evacuation routes from the CAA and SAAs; and, a description of the arrangements made with the local emergency authorities.

SJAFOB developed a quick reference guide (QRG) revised in 2021 that had the required components including a map of the facility showing where hazardous wastes are generated, accumulated, and stored with routes for accessing those wastes; and a map of the facility with a one-mile radius identifying surrounding businesses, residents, and schools.

Weekly Inspection – The inspectors reviewed weekly inspection records of the CAA from 7/1/20 to 1/13/21. The weekly inspections are performed by Louis Bechel and Ernesto Gonzalez. The inspections are performed every Wednesday unless there is a holiday, then inspections are performed twice weekly to ensure 7 days is not exceeded.

Arrangements with Local Authorities – SJAFOB last submitted the Contingency Plan and Quick Reference Guide to the following local emergency authorities: Jeffrey Brogneaux with UNC Healthcare on August 28, 2020, TSgt. McCoy with Security Forces (law enforcement services) on September 1, 2020, and Sean Quinby, Robert Klinger, Nicholas Swope with Security Forces (firefighting services) on September 2, 2020. Mr. Mayette had email delivery confirmations from each entity.

Manifests/Land Disposal Restriction (LDR) Notifications – Hazardous waste manifests and LDRs were available for review prior to the inspection. Manifests were reviewed from June 24, 2020 through January 6, 2021. The manifests were signed by Daniel Mayette. The manifests appeared correct and complete with Land Disposal Restrictions. No discrepancies were found.

The following treatment, storage, and disposal facilities (TSDFs) have contracts to accept hazardous waste from SJAFOB:

TSDFs	EPA ID#
Clean Earth of Calvert City/ AES Asset Acquisition Corporation	KYD985073196
Safety Kleen Systems Inc	NCD000776740

The following transporters have contracts to move hazardous waste overland from the base to a TSDFs:

Transporters	EPA ID#
Freehold Cartage Inc	NJD054126164
Safety Kleen Systems Inc.	TXR000081205
Clean Harbors	MAD039322250

Universal waste batteries and lamps were last shipped offsite on 12/2/20 by Freehold Cartage. Used antifreeze was also shipped offsite on 12/2/20.

Waste Minimization – SJAFOB has a written “Waste Minimization Plan.” According to AFB representative, waste minimization is achieved through the Base Hazardous Material Program tracking hazardous materials, the Free Issue Program where hazardous materials are advertised and obtained free for authorized users, and the reclaiming jet fuel from absorbent materials that

are fuel blended by Safety Kleen and a Hazardous Materials. Recycling efforts also include plastic, paper, cardboard, and glass.

10) Signed

Signature
Parvez Mallick
Inspector and Author of Report

Date

11) Concurrence and Approval

Signature
Araceli B. Chavez
Chief
RCRA Enforcement Section

Date