

RCRA Inspection Report

1) Inspector and Author of Report

George McBroom
Life Scientist
Phone: 404-562-8170
Mcbroom.george@epa.gov

Alan Newman
Environmental Engineer
Phone: 404-562-8589
newman.alan@epa.gov

U.S. Environmental Protection Agency, Region 4
Enforcement and Compliance Assurance Division
Chemical Safety and Land Enforcement Branch
RCRA Enforcement Section
61 Forsyth Street, S.W.
Atlanta, Georgia 30303

2) Facility Information

United States Marine Corps Logistics
Base
Installation & Environment Division
Environmental Branch I40300
814 Radford Blvd. STE 20315
Albany, Georgia 31704-0315
Dougherty County

EPA ID#: GA7170023694
NAICS #: 928110 – National Security

3) Responsible Officials

Maria Jones, MCLB-Albany
Environmental Protection Specialist
maria.jones@usmc.mil

4) Inspection Participants

Maria Jones, MCLB-Albany
Michael Chappell, MCLB-Albany
Darrell Wilson, MCLB-Albany
Sam Reimer, MCLB-Albany
Gene Triveal, MCLB-Albany
Lynette Murphy, MCLB-Albany
Lanny Sloan, MCLB-Albany
Ralph Perry, MCLB-Albany
Rick Tindell, MCLB-Albany
Matthew Bohannon, MCLB-Albany

Josh Hayes, GAEPD
Alan Newman, USEPA
George McBroom, USEPA

5) Date of Inspection

February 25-26, 2025; 8:00 am – 4: 45 pm and February 27, 2025, 7:45 am – 11:00 am.

6) Applicable Regulations¹

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; Georgia Hazardous Waste Management Act, Ga. Code Ann. § 12-8-60 *et seq.*, and Georgia Hazardous Waste Management Rules, Ga. Comp. R. and Regs. 391-3-11.01 to 391-3-11.18 (2016 and 2018); and Hazardous Waste Permit Number HW-009(S)-3.

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.02(1) [40 C.F.R. § 260.10], a large quantity generator (LQG) of hazardous waste is a generator who generates greater than or equal to 1,000 kilograms (2,200 pounds) of non-acute hazardous waste in a calendar month.

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.08 [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 Section 12-8-66 of the GHWMA, Ga. Code Ann. § 12-8-66 [Section 3005 of RCRA, 42 U.S.C. § 6925], provided that the generator complies with the conditions listed in Ga. Comp. R. and Regs. 391-3-11-.08 [40 C.F.R. § 262.17] (hereinafter referred to as the “LQG Permit Exemption”).

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.08(1) [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 Section 12-8-66 of the GHWMA, Ga. Code Ann. § 12-8-66 [Section 3005 of RCRA, 42 U.S.C. § 6925], and without complying with Ga. Comp. R. and Regs. 391-3-11-.08 [40 C.F.R. § 262.16(b) or § 262.17(a)], except as required in Ga. Comp. R. and Regs. 391-3-11-.08 [40 C.F.R. § 262.15(a)(7) and (8)], provided that the generator complies with the satellite accumulation area (SAA) conditions listed in Ga. Comp. R. and Regs. 391-3-11-.08 [40 C.F.R. § 262.15] (hereinafter referred to as the “SAA Permit Exemption”).

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.07 [40 C.F.R. § 261.4(a)(26)], solvent-contaminated wipes that are sent for cleaning and reuse are not solid wastes from the point of generation, provided that the conditions listed in Ga. Comp. R. and Regs. 391-3-11-.07 [40 C.F.R. § 261.4(a)(26)] are met (hereinafter referred to as the “Solvent-Contaminated Reusable Wipe Exclusion”).

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.18 [40 C.F.R. § 273.9], a large quantity handler of universal waste (LQHUW) is a universal waste handler who accumulates 5,000 kilograms or more total of universal waste (batteries, pesticides, mercury-containing equipment, lamps, or aerosol cans, calculated collectively) at any time.

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.

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.07 [40 C.F.R. § 261.4(b)(18)], solvent-contaminated wipes, except for wipes that are hazardous waste due to the presence of trichloroethylene, that are sent for disposal are not hazardous wastes from the point of generation, provided that the conditions listed in Ga. Comp. R. and Regs. 391-3-11-.07 [40 C.F.R. § 261.4(b)(18)] are met (hereinafter referred to as the “Solvent-Contaminated Disposable Wipe Exclusion”).

The State of Georgia, Department of Natural Resources, Environmental Protection Division issued Hazardous Waste Facility Permit HW-009(S)-3 on November 30, 2015, which expires on November 30, 2025. The permit was issued for storage of hazardous waste in containers, investigation of Solid Waste Management Units (SWMUs) and Areas of Concern (AOCs), and provisional corrective action to remediate releases of hazardous constituents at SWMUs.

7) Purpose of Inspection

The purpose of this inspection was to conduct an unannounced compliance evaluation inspection (CEI) to determine Marine Corps Logistics Base, hereafter MCLB or the facility, compliance with the conditions of its State of Georgia RCRA Hazardous Waste Facility Operating Permit [HW-009(S)-3], the applicable requirements of RCRA, and the corresponding State of Georgia regulations. This was an EPA lead inspection.

8) Facility Description

MCLB is a 3,323-acre logistics base for the Fleet Marine Forces and other military customers, located in Albany, Georgia. The facility consists of many buildings, most of which are devoted to the intake, repair, and storage of military vehicles of varying types. The other buildings on the facility include permitted hazardous waste (HW) storage, central accumulation area buildings, on-base housing, auto repair shop, base maintenance, an industrial wastewater treatment plant (IWTP), and a medical clinic. The medical clinic houses a fully functioning pharmacy and dental clinic. The installation generates a number of waste streams and the following waste streams are on the most recent notification: D001-D003, D006-D011, D018, D024-D027, D035, D039-D040, D043, F003, F005, F019, U002, and U154.

The base is generally divided into “base side” and Marine Depot Maintenance Command – Production Plant (MDMC-PPA or PPA). Base side is considered all base operations other than the MDMC-PPA and includes general maintenance and maintenance for the base vehicle fleet. Base side primarily generates universal waste (UW) and used oil but is responsible for the final storage and management of the HW on the property. The MDMC-PPA is the primary source of HW on the installation due to the heavy maintenance activities which take place there.

MDMC-PPA generates multiple waste streams from activities such as blasting, painting, parts washing, and other maintenance related activities. They generate several waste codes, primarily D001, D002, D003, D006, D007, D008, D035, F003, and F005. The MDMC-PPA contains Central Accumulation Areas (CAAs), SAAs, used oil tanks/ containers, and Excluded Solvent-Contaminated Wipe (ESCW) collection containers. PPA has its own environmental staff who work with the base side Installation and Environmental (I&E) personnel to ensure compliance with RCRA and movement of HW from these areas to the permitted storage facility for

transport off base. MDMC-PPA is a large complex with multiple buildings and is divided into Cost Work Centers (CWCs), which are essentially workstations for certain functions of the maintenance process. Paint booths at the base are designated as “SC” in the numbering scheme on the base map.

9) Previous Inspection History

The Georgia Environmental Protection Division (GAEPD) has conducted four (4) RCRA CEIs at the subject facility in the previous five (5) years and found four (4) violations during those inspections.

On June 5, 2024, GAEPD conducted the most recent RCRA CEI at the subject facility and found two (2) apparent violations of RCRA’s requirements for Contingency Plan and Permit Conditions. As a result, GAEPD issued a Notice of Violation to MCLB on October 4, 2024, and later verified that the facility had returned to compliance via update of required information.

The EPA Region 4 conducted its last RCRA CEI on July 17, 2018, and identified fourteen (14) apparent violations of RCRA’s requirements. The enforcement was referred to GAEPD and MCLB was issued a final compliance order on December 27, 2018.

10) Opening Conference

On February 25, 2025, EPA inspectors George McBroom and Alan Newman, accompanied by Josh Hayes, GAEPD inspector, arrived at MCLB at approximately 8:00 am. Maria Jones, Environmental Protection Specialist, immediately received the inspectors at the gate. At the I&E office, Maria Jones and the inspectors were joined by Darell Wilson, Environmental Branch Head, for the opening conference. The inspectors introduced themselves, showed their credentials to Maria Jones, 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 facilities ability, pursuant to 40 C.F.R. § 2.203, to assert a business confidentiality claim for information submitted to EPA. The facility did not assert a business confidentiality claim.

Maria Jones and Darell Wilson 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 facility representatives led the inspection team on a tour of the Facility operations. Maria Jones and inspectors were joined by Michael Chappell, Environmental Protection Assistance, upon departure from the opening conference for the field inspection activities.

11) Inspection Observations

Building 1625 – Permitted Storage

The permitted storage area consists of a roofed, concrete pad divided into ten bays surrounded by a chain-link fence; the fencing reaches from the ground to the roof. The floor consists of coated concrete; and each bay is separated by concrete curbing which runs to the edge of installed floor drains. The floor drains for each bay are separated by a concrete divider in the sump. The MCLB posted the following signs: “Hazardous Waste Storage Facility” and “No Smoking within 50 feet” on the exterior of Building 1625. Building 1625 was equipped with portable fire extinguishers, decontamination equipment, and spill equipment located within or near the building. MCLB utilizes cell phones to call the numbers for emergency response located on signage on the fence for communications from this location. MCLB operates an on-site fire department. In the permitted area, inspectors observed seven (7) HW containers; (2) 55-gallon poly, (1) 55- gallon steel, and (4) 5-gallon plastic containers. All containers were labeled “Hazardous Waste,” were compatible with the waste, were closed, and were in good condition. All containers were marked with accumulation start dates of less than one year. All containers had hazard indications written on the labels, but these were small and difficult to read. Inspectors recommended that the facility utilize DOT labels or larger words on the container that could be seen from a distance in the event of emergency (Photographs 1 – 16).

MDMC PPA

PPA - CAAs

The PPA complex contains seven (7) CAAs located at various points. Inspectors observed all containers to be closed, compatible with their waste, in good condition, labeled with the words “Hazardous Waste,” and marked with accumulation start dates less than 90 days. Unless noted all CAAs contained the proper signage, and had appropriate fire, decontamination, spill response equipment, and secondary containment, where necessary. All CAAs, except for Building 2236 - CWC 281, had containers missing the required “Toxic” hazard indicator on at least one container, all of which were corrected on the spot or prior to departure from MCLB. All other hazard indicators observed appeared to be appropriate (Photographs 17-20, 24-26, 28-33, 49-55).

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.17(a)(5)(i)(B)], which is a condition of the LQG Permit Exemption, a generator must mark or label its containers with an indication of the hazards of the contents.

Table 1 lists all CAAs for which there were either no observations or no additional observations beyond the above-mentioned missing “Toxic” hazard indicators. Any CAAs with additional observations are listed after Table 1.

Table 1 – PPA CAAs which had either no observations or only the observation of missing “Toxic” indicators on containers within the CAA.

Building	CWC	Name	Container Qty and size	Container Type(s)
2222	283	SC-9	(3) 55-gallon	Steel
2222	283	SC-10	(1) 30 and (1) 55-gallon	Steel
2236	281	Blast Room	(7) 55-gallon	Steel
2214	333	Main PPA CAA	(28) 55-gallon, (4) 30-gallon, and (3) 5-gallon	Steel and Plastic

Building 2211 – CWC 283 – SC-26

Inspectors observed two (2) 55-gallon and one (1) 30-gallon steel containers on secondary containment pallet. The location was not equipped with a portable fire extinguisher, decontamination equipment, and spill control equipment (Photographs 37-40). MCLB emailed photo documentation of the corrections on February 28, 2025.

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.17(a)(6)], which incorporates Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. Part 262.252(c)], and is a condition of the LQG Permit Exemption, areas of an LQG where hazardous waste is generated or accumulated must have portable fire extinguishers, fire control equipment (including any required special extinguishing equipment), spill control equipment, and decontamination equipment.

Building 2233 – CWC 282 – SC-17 and SC-18

In SC-17, inspectors observed two (2) 55-gallon steel containers placed on a secondary containment pallet. In SC-18, inspectors observed one (1) 30-gallon and one (1) 55-gallon containers placed on a secondary containment device. Neither CAAs was equipped with spill control equipment (Photographs 41-45). MCLB emailed photo documentation of corrections on February 28, 2025.

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.17(a)(6)], which incorporates Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. Part 262.252(c)], and is a condition of the LQG Permit Exemption, areas of an LQG where hazardous waste is generated or accumulated must have portable fire extinguishers, fire control equipment (including any required special extinguishing equipment), spill control equipment, and decontamination equipment.

In SC-24, inspectors observed two (2) 55-gallon steel containers placed on a secondary containment pallet. In SC-23, inspectors observed one (1) 30-gallon container placed on a secondary containment device. These two CAA locations were not equipped with spill control equipment (Photographs 46-48). MCLB emailed photo documentation of corrections on February 28, 2025.

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.17(a)(6)], which incorporates Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. Part 262.252(c)], and is a condition of the LQG Permit Exemption, areas of an LQG where hazardous waste is generated or accumulated must have portable fire extinguishers, fire control equipment (including any required special extinguishing equipment), spill control equipment, and decontamination equipment.

PPA – SAAs

The PPA complex contained fifteen (15) SAAs located throughout the complex. Inspectors observed all containers to be closed, compatible with their waste, in good condition, and labeled with the words “Hazardous Waste.” The inspectors observed the SAAs in Table 2, which appeared to be in compliance with the requirements at the time of the inspection. All SAAs with observations are outlined following Table 2.

Table 2 – Inspected SAAs that were located within the PPA and had no observable issues.

Building	CWC	Name	Container Qty and size	Container Type(s)
2201	212	Engine & Transmission Shop	(1) 30-gallon	Steel
2200	228	Small Arms Shop – Blast Tumbler	(1) 15-gallon and (1) 30-gallon	Steel
2200	213	Outdoor Blast Cabinet	(1) 30-gallon	Steel

Inspectors observed that containers in three (3) SAAs were in good condition, closed, and labeled “Hazardous Waste.” Multiple SAA containers were labeled with a single hazard but failed to have included an indication of the “Toxic” hazard associated with the waste codes. These SAAs locations are listed in Table 3 (Photographs 34 – 36).

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.15(a)(5)(ii)], which is a condition of the SAA Permit Exemption, a generator is required to mark or label its containers with an indication of the hazards of the contents.

Table 3 – SAA containers that were located within the PPA without Toxic hazard indicator.

Building	CWC	Name	Container Qty and size	Container Type(s)
2258	282	SC-33	(1) 55-gallon	Steel
2252	283	Light Painting	(1) 55-gallon	Steel
2311	333	Hazmat Cell	(1) 55-gallon	Steel

Building 2311 – CWC 333 – Hazmat Cell

As an area of concern inspectors observed one (1) 55-gallon steel container of “Universal Waste Aerosol Cans” that was not labeled with an accumulation start date. Matthew Bohannon, HW Disposer for the Hazmat cell, stated that MCLB did not track the accumulation dates in this area since containers for the UW Aerosol Cans were changed out approximately weekly. The inspection team recommends maintaining a log sheet similar to other areas of the site or other method to ensure compliance with the timeframe limits for this waste stream.

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.18 [40 C.F.R. § 273.35(c)], a LQHUW must be able to demonstrate the length of time that the universal waste has accumulated from the date that it became a waste or was received.

Building 2200 – CWC 212 – Large Parts Washers

In this Cost Work Center, inspectors spoke with Emmett Williams III regarding the two large parts washer units. One of the parts washers uses “Big Red Solvent” and the other uses steam. Next to the steam washer, inspectors observed one (1) 55-gallon steel container with a lid which had a funnel welded to it. When asked about the container Emmett explained that the machine had a skimmer unit for removing the resultant waste material from the wash water. This resultant sludge then flows down a trough to the accumulation container. The waste was labeled as D006 and D008, with the words “Hazardous Waste,” and with an indication of the hazard “Toxic.” Due to the design of the welded funnel lid, the container was open. Facility personnel were notified that containers in a SAA must be kept closed unless adding or removing waste (Photographs 56-57). MCLB emailed photo documentation of correction on February 28, 2025.

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.15(a)(4)], which is a condition of the SAA Permit Exemption, a generator is required to keep containers of hazardous waste closed at all times during accumulation, except when adding, removing, or consolidating waste; or when temporary venting of a container is necessary for the proper operation of equipment, or to prevent dangerous situations, such as build-up of extreme pressure.

Excluded Solvent Contaminated Wipes

Building 2222 – CWC 283 – “Big Paint”

Adjacent to SC-9 inspectors observed one (1) 55-gallon steel container with a flip top lid, the container and lid were labeled “Excluded Solvent Contaminated Wipes.” The lid was closed, but the container had two holes near its base (Photographs 21-23). When asked about the management of the wipes, MCLB personnel explained that a contracted company collects and launders the ESCWs and supplies clean wipes. Facility staff explained that the individual HW coordinators for each CWC were responsible for changing full containers for empty containers and documenting this collection on the log sheet in the tool room. This log sheet was presented and only one entry was found on the log sheet for CWC 283, which represents “Big Paint” (Photograph 27). This entry was for July 16, 2024, which was more than 180 days prior to the inspection date.

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.07(1) [40 C.F.R. § 261.4(a)(26)(i)], solvent contaminated wipes that are sent for cleaning and reuse are not solid waste, and must be contained in non-leaking, closed containers that are labeled “Excluded Solvent Contaminated Wipes.” The containers must be able to contain free liquids, should free liquids occur.

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.07(1) [40 C.F.R. § 261.4(a)(26)(ii)], solvent contaminated wipes that are sent for cleaning and reuse are not solid waste and may be accumulated by the generator for up to 180 days from the start date of accumulation for each container prior to being sent for cleaning.

Building 2200 – CWC 273 – “Craneway”

Adjacent to CWC 273, against the wall, inspectors observed one (1) 55-gallon steel container with a flip top lid marked “Excluded Solvent Contaminated Wipes.” The container was in good condition but was not closed. The log sheet for ESCWs was reviewed and documented that wipes in this workstation were less than 180 days old. MCLB personnel corrected the open container prior to departure and emailed photo documentation on February 28, 2025.

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.07(1) [40 C.F.R. § 261.4(a)(26)(i)], solvent contaminated wipes that are sent for cleaning and reuse are not solid waste, and must be contained in non-leaking, closed containers that are labeled “Excluded Solvent Contaminated Wipes.” The containers must be able to contain free liquids, should free liquids occur.

Building 2200 – CWC 213 – Hydraulics Shop

Inspectors observed a worktable which was divided into two workstations with three (3) 5-gallon steel containers which were marked as “Excluded Solvent Contaminated Wipes.” These containers were not labeled with accumulation start dates. MCLB personnel stated that two (2) of these containers were at a workstation whose process was discontinued. The third container was located an operational workstation, which was unattended at the time. MCLB personnel removed these containers and their contents on the day of the inspection. MCLB emailed photo documentation of the removal of these ESCW wipe containers on February 28, 2025.

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.07(1) [40 C.F.R. § 261.4(a)(26)(v)(B)], generators of solvent-contaminated wipes must maintain at their site documentation that the 180-day accumulation time limit in Ga. Comp. R. and Regs. 391-3-11-.07(1) [40 C.F.R. § 261.4(a)(26)(ii)] is being met.

PPA – Used Oil

Building 2200 – CWC 213 – Hydraulic Shop

Inspectors observed multiple 1-gallon containers of dark liquid appearing to be oil under a worktable in the hydraulic shop. Facility personnel could not identify the contents of these containers but indicated that they were storing waste. The 1-gallon containers were unlabeled. Generators who generate a solid waste must conduct a hazardous waste determination.

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.11], a person who generates a solid waste, as defined in Ga. Comp. R. and Regs. 391-3-11-.07(1) [40 C.F.R. § 261.2], must make an accurate determination as to whether that waste is a hazardous waste in order to ensure wastes are properly managed according to applicable RCRA regulations articulated in Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.11].

Building 2238 – Used Oil, Used Fuel, and Used Antifreeze storage

Inspectors observed three (3) above ground storage tanks: one for used oil, a second for used fuel, and the third for used antifreeze. The volume of the used oil tank was 5,000-gallons and each tank was housed with secondary containment. All used oil and fuel products are taken by a recycler. Used oil generated at this location is processed through an oil-water separator into the used oil tank. No observations were made in this building.

Main Base Facilities (MBF)

MBF – CAAs

IWTP – Industrial Wastewater Treatment Plant

The IWTP operates under permit # 27 from the City of Albany. The IWTP processes industrial wastewater from the PPA through a series of steps to adjust the pH, add a flocculate to consolidate solids, and remove the solids using a filter press. Inspectors interviewed Chris Speich and Charlie Thornton, the wastewater operators, in the lab room of the treatment plant. They conduct pH monitoring and utilize an outside laboratory for further analytical testing. Facility personnel stated that they had not been notified of any limit exceedances by the City of Albany.

MCLB accumulates F019 hazardous waste solids from the filter press into a 40-foot roll-off container. Inspectors observed a trough below the filter press that collects liquids from the process. Inspectors observed that this trough accumulated some F019 hazardous waste solids which flow into a containment sump. At the grate of the sump there was dried F019 material,

and what appeared to be built up F019 material in the sump. Charlie Thornton and Maria Jones stated that there was no current preventative maintenance procedure (PM) for cleaning out the sump. Inspectors identified this as an area of concern. (Photographs 63-64). MCLB emailed photo documentation of the corrective action on February 28, 2025.

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.17(a)(6)], which incorporates Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.251] and is a condition of the LQG Permit Exemption, a generator is required to maintain and operate its facility to minimize the possibility of a fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water which could threaten human health or the environment.

MBF – SAAs

Building 5501 – Installation and Environmental Building

Inspectors observed one (1) 55-gallon steel container of “broken bulbs” which was labeled as “Hazardous Waste,” D009, and an indication of Toxic hazard. The container was closed and in good condition. Inspectors noted as an area of concern that the word toxic was written very small and recommended that it be written larger or that the facility utilize a Toxic DOT label.

Building 5511 – Recycling Center

The Recycling Center operated one aerosol can crusher device. Inspectors noted that the aerosol can crusher device was designed with an opening to the environment at the back of the unit. This opening allowed inspectors to view the open container underneath the unit, constituting an open container. The inspectors also noted that the 55-gallon steel container acting as the waste container, which was labeled “Hazardous Waste,” was not labeled with an indication of the hazard (Photographs 58-60). MCLB emailed photo documentation of the hazard indication labeling on February 28, 2025. On April 30, 2025 Maria Jones provided photos of new aerosol can crushers and their schematics to illustrate that the new crushers were completely enclosed and routed all exhaust through filters.

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.15(a)(4)], which is a condition of the SAA Permit Exemption, a generator is required to keep containers of hazardous waste closed at all times during accumulation, except when adding, removing, or consolidating waste; or when temporary venting of a container is necessary for the proper operation of equipment, or to prevent dangerous situations, such as build-up of extreme pressure.

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.15(a)(5)(ii)], which is a condition of the SAA Permit Exemption, a generator is required to mark or label its containers with an indication of the hazards of the contents.

Building 5591 – Hobby Shop

Inspectors observed an industrial aerosol can crusher in the hobby shop. This crusher utilized a 5-gallon plastic container to collect waste from the crushing activity. This container was labeled

“Hazardous Waste,” D001, D035, and D040, was closed, and was in good condition. There was no indication of hazard on the container. MCLB emailed photo documentation of the correction on February 28, 2025.

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.15(a)(5)(ii)], which is a condition of the SAA Permit Exemption, a generator is required to mark or label its containers with an indication of the hazards of the contents.

MBF – Universal Waste

Building 5501 – Installation and Environmental Building

Inspectors observed multiple fiberboard containers of “Universal Waste Lamps” which were labeled, closed, in good condition, and dated with accumulation start dates of less than one year. Additionally, inspectors observed one each of a 30-gallon plastic container, 20-gallon plastic container, and fiberboard box of “Universal Waste Batteries” which were labeled, closed, in good condition, and labeled with accumulation start dates of less than one year.

MBF – Used Oil

5511 – Recycling Center

Inspectors observed an industrial used oil filter crusher. The used oil filter crusher had a 55-gallon steel container underneath which was labeled as “Used Oil” and was in good condition.

Building 5400 – Non-tactical Vehicle Branch (NTVB) Maintenance

The building is divided into two large bays. In Bay 1 inspectors observed two (2) steel containers labeled “Used Oil” which were in good condition. In Bay 2 Inspectors observed three (3) 20-gallon steel rolling containers which are for collection of used oil. Additionally, inspectors observed four (4) roll-under “day pans” which are for collection of used oil. None of these containers were labeled as “Used Oil.” All were in good condition (Photographs 61-62). MCLB emailed photo documentation of correction on February 28, 2025.

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.17 [40 C.F.R. § 279.22(c)(1)], containers and aboveground tanks used to store used oil at generator facilities must be labeled or marked clearly with the words “Used Oil.”

Inspectors observed a 1,000-gallon used oil tank behind Building 5400. The tank was in secondary containment, closed, and labeled as “Used Oil.” There was a large poly containment bin with a lid beside the tank. This bin housed a 55-gallon steel container used to contain drips from the transfer hose. The bin was closed; both the bin and steel container were labeled as “Used Oil.”

Pharmacy

Inspectors met with Chief Benitez, Chief Lucas, Hospital Corpsman First Class (HM1) Lightner, and Hospital Corpsman Third Class (HM3) Sampilo at the medical clinic. Inspectors asked about

the handling of waste pharmaceuticals and HM1 Lightner indicated that they both disposed of waste pharmaceuticals and returned un-expired pharmaceuticals to a reverse distributor. In the pharmacy, inspectors observed three (3) 7.5-gallon plastic containers with closed lids which were labeled "Chemo Waste," "Liquid Waste," and "Solid Waste," all of which were for non-hazardous drugs. There was one (1) 2.5-gallon plastic container with a closed lid labeled "Hazardous Waste Pharmaceuticals" and "Liquid Waste" which was next to the non-hazardous containers. Inspectors asked about the treatment of DEA controlled pharmaceuticals. HM1 Lightner showed inspectors that these waste pharmaceuticals are kept in a safe. Once damaged or expired, they are placed in a destruction pack which denatures the pharmaceuticals and makes them unusable. Guidance on the package indicates that, once denatured, the package can be thrown in the ordinary trash. The pharmacy does not produce many of these DEA controlled pharmaceuticals and had a pack of the denatured pharmaceuticals which they were holding (Photographs 65-66). Inspectors noted this as an area of concern because the denatured pharmaceuticals still need to be characterized, and a waste determination made. Inspectors told HM1 Lightner that a potential route for sending out these destroyed pharmaceuticals is to treat them as hazardous waste and dispose of with their hazardous waste pharmaceuticals.

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.19 [40 C.F.R. § 266.502(c)], a healthcare facility that generates a solid waste that is a non-creditable pharmaceutical must determine whether that pharmaceutical is a hazardous waste pharmaceutical in order to determine whether the waste is subject to this subpart. A healthcare facility may choose to manage its non-hazardous waste pharmaceuticals as non-creditable hazardous waste under this subpart.

12) Records Review

Used Oil and Crushed Aerosol Recycling

Inspectors reviewed the used oil, and crushed aerosol can for recycling shipment records. Used oil shipments were sent on a recurring basis. Jay Howell (P2 Manager, Base Environmental) reviewed the crushed aerosol can for recycling bill of lading records with inspectors for clarification. The recycler does not use a line-item description that clearly states crushed aerosol cans for recycling, but Jay Howell was able to clarify the code on the recycling receipt. Inspectors recommended, that going forward, base environmental staff indicate by notation which lines are for crushed aerosol can recycling.

Contingency Plan:

The actions that facility personnel should take in response to an emergency are described in the facility's Final Hazardous Waste Contingency Plan and Quick Reference Guide, which was last updated in September 2023.

The plan described the actions facility personnel must take during emergencies, described the arrangements with local emergency agencies, and contained a list of all emergency equipment and the location within the facility. The plan contained a list of the 24-hour emergency coordinator contacts, but this list was out of date. The plan also contained maps which were

meant to describe the ingress/egress for buildings, but the maps were not at an appropriate scale to be utilized effectively. Further, the facility was unable to provide a letter to indicate when the plan had been sent to local emergency agencies.

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.17(a)(6)], which incorporates Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.261(d) and (f)], and is a condition of the LQG Permit Exemption, (d) the contingency plan must list names and emergency telephone numbers of all persons qualified to act as emergency coordinator, and this list must be kept up to date and (f) the contingency plan must include an evacuation plan for generator personnel where there is a possibility that evacuation could be necessary.

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.17(a)(6)], which incorporates Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.263(d)], and is a condition of the LQG Permit Exemption, a generator is required to review and immediately amend its contingency plane, if necessary, whenever the list of emergency coordinators changes.

Quick Reference Guide (QRG)

Inspectors observed that the provided QRG had multiple missing or inadequate sections. The facility QRG contained the estimated maximum amounts of hazardous waste that may present at any one time and the facility does not have any special hazards for treatment. The QRG was missing the following portions (1) descriptions of the hazardous wastes in layman's terms, (4) a map of the facility where hazardous waste is generated, accumulated, and treated with routes for accessing these wastes, (5) a street map of the entire base facility in relation to surrounding businesses, schools and residential areas, (6) a map showing the locations of water supply with hydrants and flow rates, and (7) no identification of on-site notification systems. There was no documentation that the QRG had been submitted to local emergency agencies with the Contingency Plan. Documentation of the required street map was provided received on March 17, 2025.

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.17(a)(6)], which incorporates Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.262(b)(1), and (4) through (7)], and is a condition of the LQG Permit Exemption, an LQG must submit a quick reference guide to the local emergency responders and the QRG must contain (1) the types/names of hazardous waste in layman's terms and the associated hazards (4) a map of the facility showing where hazardous wastes are accumulated, generated, and treated and the routes for access (5) a street map of the facility in relation to surrounding businesses, schools, and residential areas to understand access to facility and evacuation of citizens and workers (6) the locations of water supply (e.g. fire hydrants and flow rates) (7) identification of on-site notification systems.

Job Descriptions and Training Records:

The inspectors reviewed facility hazardous waste personnel job descriptions and employee names that were provided for Environmental Protection Specialists for both base I&E and PPA.

Inspectors noted as an area of concern that the job descriptions did not provide a clear description of the required duties. Facility personnel explained that all members have interchangeable responsibilities and that the provided descriptions outlined what that position does. Inspectors informed Maria Jones that the provided description looked more like a standard operating procedure (SOP) for doing the job instead of an actual list of required duties. Inspectors recommended reformatting the description to provide an outline of the required duties conducted by the position.

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.17(a)(7)(iv)(B)], which is a condition of the LQG Permit Exemption, the generator must maintain a written job description for each position related to hazardous waste management. This description must include the requisite skill, education, or other qualifications, and duties of facility personnel assigned to these positions.

The staff with RCRA duties on the facility are Maria Jones, Michael Chappell, Lynette Murphy, Lanny Sloan, and Ralph Perry. Certificates of annual refresher training for RCRA hazardous waste management were provided for these staff members. Inspectors reviewed the slide presentation used for RCRA training.

Waste Manifest and Land Disposal Restriction (LDR) Records:

Inspectors reviewed hazardous waste manifests for all of 2024 and up to the date of inspection in 2025. An LDR form was attached to all manifests for the associated waste streams. All manifests examined included signed generator and designated facility copies.

Weekly Inspection Records:

Inspectors reviewed the weekly inspection records for 2024 to the date of inspection in 2025 for permitted storage, PPA-CAAs, and MBF-CAAs. The inspection team noted the following: in the permitted storage building, PPA Building 2600, and MBF Building 5508, inspections were completed on December 20, 2024, and next on December 31, 2024, resulting in an eleven-day gap between inspections. In building 2600, inspections were completed on November 19, 2024, and next on December 3, 2024, resulting in a two-week gap between inspections. Inspectors recommended changes to the inspection sheets as they incorporate multiple inspection items unrelated to RCRA. Additionally, inspectors recommended recording the number of containers and the oldest accumulation start date on the inspection sheet to assist in tracking.

Pursuant to Section I. General Permit Conditions, I.F.1.b., Conditions Related to Compliance with General Facility Standards, of the State of Georgia Department of Natural Resources, Environmental Protection Division Hazardous Waste Permit Number HW-009(S)-3, the permittee must follow the procedures and plans described in the Permit Application dated August 17, 2015, as amended, which are hereby incorporated by reference and include at least the following: b. Inspection schedule Section F. The referenced inspection schedule requiring routine weekly inspections of the HWSF building, equipment, and containers.

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.17(a)(1)(v)], which is a condition of the LQG Permit Exemption, a generator is required to, at least weekly, inspect

central accumulation areas looking for leaking containers and for deterioration of containers caused by corrosion or other factors.

13) Closing Conference

The inspectors conducted the exit meeting at 10:01 AM on February 27, 2025, with Maria Jones, Lynette Murphy, Ralph Perry, Lanny Sloan, Jay Howell, Darrell Wilson, and Michael Chappell (on the phone). During this meeting, the inspectors stated their preliminary conclusions of the inspection. MCLB agreed to provide photos of physical corrections, updated Contingency Plan, updated QRG, confirmation of receipt for Contingency Plan and QRG by local emergency agencies, and PM for cleaning F019 from filter press grate/sump, and updated job descriptions for all environmental staff.

On February 28, 2025, Maria Jones provided photos of physical corrections in an email to the inspectors. On March 3, 2025, in reply to the email sent by Maria Jones, George McBroom thoroughly outlined the documentary corrections that were required for both the Contingency Plan and the QRG and reminded Maria Jones that EPA needed updated job descriptions. This email set out a two-week timeline for return of this documentation. An email was sent by the EPA on March 14, 2025, to inquire about progress on the requested corrections both from the closing conference and the email on March 3. A reply, received on March 17, 2025, indicated that the installation was still working on many of the document corrections. This email included several attachments most of which provided QRG information but contained in the Contingency Plan pages and not as a standalone QRG.

14) List of Attachments

Attachment 1 – Photo Log:

15) Signed

GEORGE MCBROOM Digitally signed by GEORGE MCBROOM
Date: 2025.05.01 13:06:13 -04'00'

George McBroom
Life Scientist

ALAN NEWMAN Digitally signed by ALAN NEWMAN
Date: 2025.05.01 13:13:46 -04'00'

Alan Newman
Environmental Engineer

16) Concurrence

ARACELI CHAVEZ Digitally signed by ARACELI CHAVEZ
Date: 2025.05.01 13:53:35 -04'00'

Araceli B. Chavez
RCRA Enforcement Section

Attachment 1 – Photo Log

67 Photos taken on: February 25 – 26, 2025

Photos taken by: George McBroom and Josh Hayes (GAEPD)

Photos taken with: Canon Powershot Elph 180

EPA Property Tag: SX8166



Photograph 1 – Permitted storage signage



Photograph 2 – Permitted storage signage



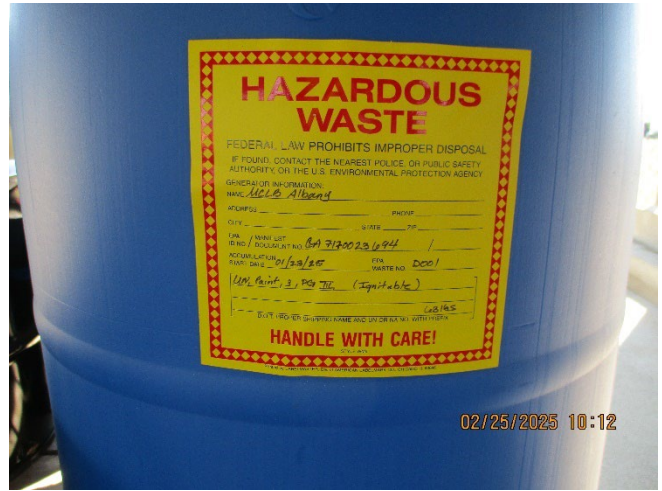
Photograph 3 – Permitted storage bays



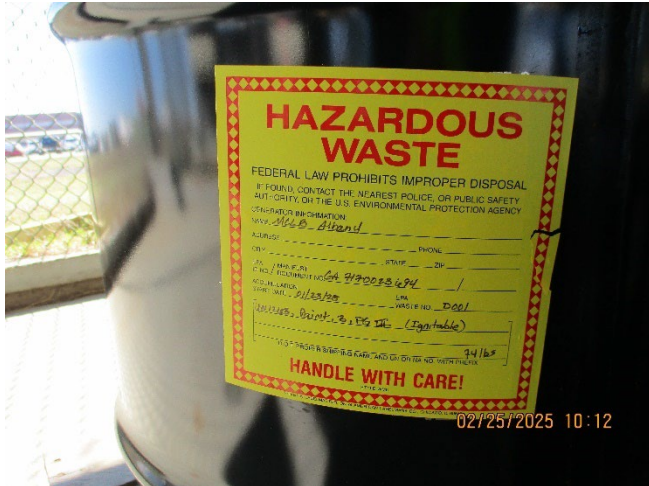
Photograph 4 – Permitted storage decontamination



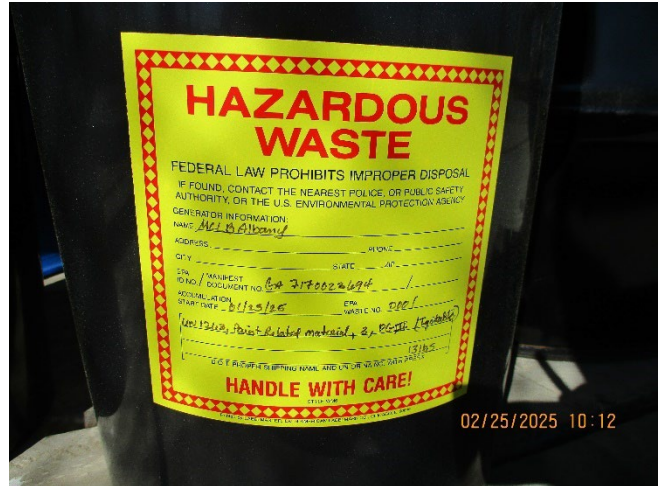
Photograph 5 – Permitted storage containers



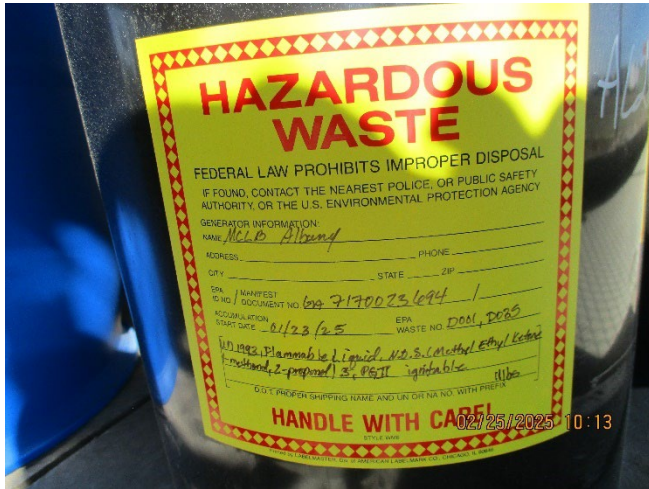
Photograph 6 – Permitted storage containers



Photograph 7 – Permitted storage containers



Photograph 8 – Permitted storage containers



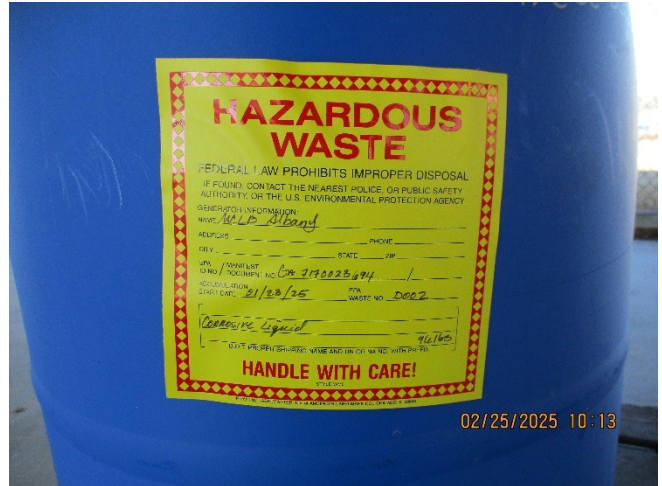
Photograph 9 – Permitted storage containers



Photograph 10 – Permitted storage containers



Photograph 11 – Permitted storage containers



Photograph 12 – Permitted storage containers



Photograph 13 – Permitted storage containers



Photograph 14 – Permitted storage response equipment



Photograph 15 – Permitted storage response equipment



Photograph 16 – Permitted storage fencing and signage



Photograph 17 – SC-9 & 10 “Big Paint”



Photograph 18 – SC – 9 CAA HW container



Photograph 19 – SC – 9 CAA HW containers



Photograph 20 – SC – 9 CAA HW containers



Photograph 21 – SC – 9 & 10 ESCW container



Photograph 22 – SC – 9 & 10 ESCW container



Photograph 23 – SC – 9 & 10 ESCW container



Photograph 24 – SC – 10 HW CAA containers



Photograph 25 – SC – 10 HW CAA containers

Photograph 26 – SC – 10 HW CAA containers

[illegible]

Photograph 27 – ESCW log page showing last entry for CWC 283 entry.

Photograph 28 – SC – 10 CAA HW containers



Photograph 29 – SC – 10 CAA HW container



Photograph 30 – CWC 281 – Blast CAA



Photograph 31 - CWC 281 – Blast CAA signage



Photograph 32 – CWC 281 – Blast CAA HW vacuum container



Photograph 33 – CWC 281 – Blast collection container



Photograph 34 – SC – 33 CAA Signage



Photograph 35 – SC – 33 CAA signage



Photograph 36 – SC – 33 HW container



Photograph 37 – SC – 26 CAA Signage



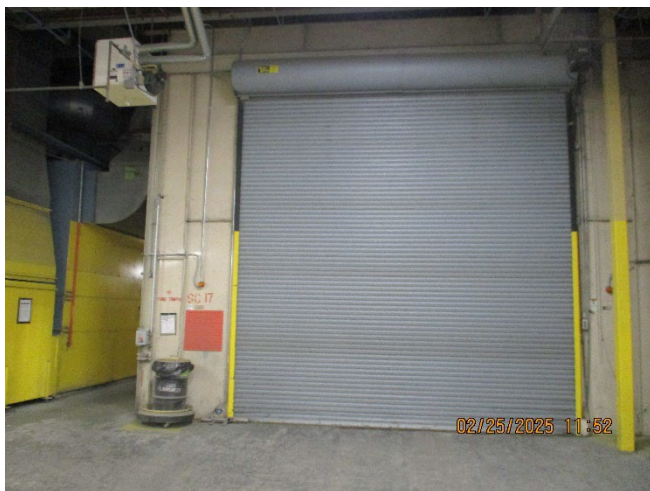
Photograph 38 – SC – 26 CAA HW containers



Photograph 39 – SC – 26 CAA HW containers



Photograph 40 – SC – 26 CAA HW container



Photograph 41 – SC – 17 Paint Booth



Photograph 42 – SC – 18 Paint Booth



Photograph 43 – SC – 17 CAA HW containers



Photograph 44 – SC – 18 CAA HW containers



Photograph 45 – SC – 17 & 18 Signage



Photograph 46 – SC – 23 & 24 CAA Signage



Photograph 47 – SC – 23 CAA HW containers



Photograph 48 – SC – 24 CAA HW container



Photograph 49 – 2214 PPA main HW storage



Photograph 50 – 2214 PPA main HW storage bays



Photograph 51 – 2214 PPA main HW containers



Photograph 52 – 2214 PPA main HW containers



Photograph 53 – 2214 PPA main HW containers



Photograph 54 – 2214 PPA main HW containers



Photograph 55 – 2214 PPA main HW containers



Photograph 56 – CWC 212 Large parts washer SAA



Photograph 57 – CWC 212 Large parts washer SAA funnel, open container



Photograph 58 – 5511 Recycling Center aerosol can crusher



Photograph 59 – 5511 Recycling Center aerosol can crusher opening



Photograph 60 – 5511 Recycling Center aerosol can crusher ventilation pipe



Photograph 61 – 5400 NTVB rolling used oil storage



Photograph 62 – 5400 NTVB rolling used oil storage



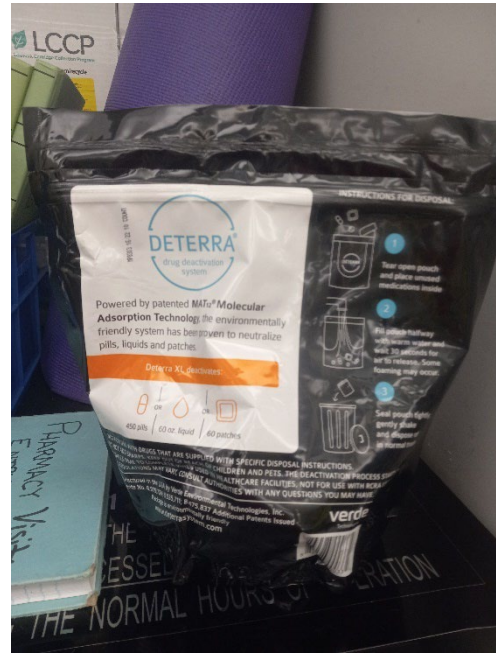
Photograph 63 – IWTP filter cake grate with F019 material



Photograph 64 – IWTP filter cake grate with F019 material and build-up in grate



Photograph 65 – DEA drug destruction bag front



Photograph 66 – DEA drug destruction bag back