

RCRA Compliance Evaluation Inspection Report

1) **Inspector and Author of Report**

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2) **Facility Information**

United States Naval Air Station Pensacola
150 Hase Rd.
Pensacola, Florida 32508
EPA ID #: FL9170024567

County: Escambia
Latitude: 30° 21' 49.430''
Longitude: 87° 15' 56.722''
Primary NAICS: 928110-National Security
SIC Code: 9711 - National Security

3) **Responsible Official**

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4) **Inspection Participants**

Parvez Mallick, U.S. EPA, Region 4

(b) (6), Florida Department of Environmental Protection (FDEP)

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(b) (6), US Naval Air Station Pensacola, Hazardous Waste Program Manager

(b) (6), US Naval Air Station Pensacola, Air/Tank/SPCC Program Manager

5) **Dates of Inspection**

March 2, 2022, 9:30 a.m.

6) **Applicable Regulations**

Resource Conservation and Recovery Act (RCRA) Sections 3002, 3005 and 3007 (42 U.S.C. §§ 6922, 6925 and 6927), and the regulations promulgated pursuant thereto at 40 Code of Federal Regulations (C.F.R.) Parts 260-270, 273 and 279.

Florida Statutes (F.S.) Chapter 403.702 *et seq.*, and the regulations promulgated pursuant thereto and set forth at the Florida Administrative Code (Fla. Admin. Code Ann. r.), Chapters 62-710, 62-730 and 62-750.

Chapter 403 of the Florida Statutes, Fla. Stat. § 403.702 *et seq.*, and rules 62.710.210-.901, and 62-730 *et seq.* of the Florida Administrative Code Annotated (Fla. Admin. Code Ann.). RCRA Post Closure Permit No.: 0154498-HF-008, of the former Sludge Drying Beds and Surge Ponds including implementation of site-wide corrective action well monitoring.

Pursuant to Fla. Admin. Code Ann. r. 62-730.160(1) [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 403.722 of the Florida Statutes, Fla. Stat. § 403.722 [Section 3005 of RCRA, 42 U.S.C. § 6925], provided that the generator complies with the conditions listed in Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.17] (hereinafter referred to as the “LQG Permit Exemption”).

Pursuant to Fla. Admin. Code Ann. r. 62-730.160(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 the 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 403.722 of the Florida Statutes, Fla. Stat. § 403.722 [Section 3005 of RCRA, 42 U.S.C. § 6925], and without complying with Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.16(b) or §262.17(a)], except as required in Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.15(a)(7) and (8)], provided that the generator complies with the satellite accumulation area conditions listed in Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.15(a)] (hereinafter referred to as the “SAA Permit Exemption”).

Pursuant to Fla. Admin. Code Ann. r. 62-730.185(1) [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, or lamps, calculated collectively) at any time.

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 March 2, 2022, (b) (6), and (b) (6) of Florida Department of Environmental Protection (FDEP) and Parvez Mallick of U.S. EPA conducted a routine compliance evaluation inspection (CEI) of the U.S. Naval Air Station Pensacola (NAS Pensacola or the facility) to determine the facility's compliance with state and federal hazardous waste regulations. This was an EPA lead inspection. NAS Pensacola was represented by (b) (6) (b) (6) Hazardous Waste Program Manager and (b) (6), Air/Tank/SPCC Program Manager. 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. The inspectors described the anticipated use of digital camera during the inspection. The inspectors briefly discussed the company's ability, pursuant to 40 C.F.R. § 2.203, to assert a business confidentiality claim for information submitted to the EPA. The company did not assert a business confidentiality claim. The inspection participants also discussed health and safety protocols and required personal protective equipment before (b) (6) led the inspectors on a tour of the federal facility operations. WhiteTail Environmental, LLC (WhiteTail) is the current environmental waste management contractor at NAS Pensacola.

8) Facility Description

The U.S. Naval Air Station Pensacola (NAS Pensacola) in Pensacola, Escambia County, Florida, is known for the Cradle of Aviation and was the first site of an established Naval Aviation command during WWI. Currently, NAS Pensacola is a fully operational and training base of the U.S. Navy and its sister armed services and other customers. This includes major tenant commands: Naval Aviation Schools Command, Naval Air Technical Training Center, Marine Aviation Training Support Group 21 and 23, the Blue Angels, and the headquarters for Naval Education Training Command, a command which combines direction and control of all Navy education and training.

NAS Pensacola is located on 6,000 acres and operates 24 hours, seven days a week. It is one of the largest training operations in the Navy with nearly 60,000 students graduating from training programs annually. NAS Pensacola trains students from every branch of military, the US Coast Guard, other agencies, and foreign allies. It is one of only four installations in the continental United States with an active runway and a deep-water port. NAS Pensacola employs over 16,000 military and 7,400 civilian employees on site.

NAS Pensacola's most recent Hazardous Waste Generator Notification (EPA Form 8700-12) dated March 20, 2020, characterized the facility as a treatment, storage, and disposal facility (TSD), a large quantity generator (LQG) of hazardous waste and a small quantity handler of universal waste (SQHUW). Currently, NAS Pensacola may generate hazardous waste streams, used oil and universal wastes (such as spent batteries and certain types of lamps), waste solvent, spent aerosol cans, paint waste and other wastes, which include EPA Waste Codes D001, D002,

D003, D005-D009, D011, D018, D026, D035, F001, F002, F003, F005 and U154.

9) Previous Inspection History

On June 23, 2021, FDEP conducted a RCRA CEI at the facility and no RCRA deficiencies were discovered.

10) Inspection Findings

Following the opening conference, the inspection team proceeded with the inspection. The inspectors inspected the following areas during the onsite inspection: Building 3580 Corrosion Control, Building 1853, Building 1854 Blue Angel Hangar, Building 2644 Fuel Farm, Building 38 Port Operations, Building 3460 Mega Building, Building 684-A 90-Day Storage Area, and Building 684. Below is a description of the observations made during the inspection. *Unless noted otherwise, for the walkthrough inspection:*

- *All satellite accumulation area (SAA) containers were observed to be closed and marked with a description of the hazardous waste being handled and/or the words "Hazardous Waste."*
- *All containers of hazardous waste observed in 90-day accumulation areas were closed, marked with the words "Hazardous Waste," an indication of hazard of the waste, and accumulation start dates.*
- *All universal waste containers were observed to be closed, marked with a description of the universal waste being handled, the words "Universal Waste," and accumulation start dates.*
- *All containers of used oil were marked "Used Oil."*

On February 7, 2020, the EPA added hazardous waste aerosol cans to the universal wastes outlined in title 40 C.F.R. Part 273, thereby giving generators the opportunity to choose the management method that best suits its operations. The State of Florida adopted the requirements of 40 C.F.R. Part 273 into the Florida Administrative Code (FAC 62-730) on October 30, 2020. It can either be managed as a universal waste or hazardous waste. The inspectors observed that NAS Pensacola was storing spent aerosol cans as universal waste and, also as hazardous waste throughout the facility. The inspectors recommended that NAS Pensacola handle spent aerosol cans as universal waste for ease of regulatory burden.

Building 3580-Corrosion Control

Building 3580 Corrosion Control is primarily conducting work on ground support equipment and paint operations with paint booths run by a contractor. The building has a multi-waste stream SAAs. The inspectors observed thirteen hazardous waste containers (ranging from 5-gallons to 55-gallons) of paint waste (Photograph #1), media blast, oily rags contaminated with metal, fuel rags, acid rags, parts washer sludge, paint chips and paint booth filters; five non-hazardous waste containers of oil spill debris, antifreeze, used oil filters, and silica waste; and one 30-gallon container of universal waste aerosol cans with an accumulation start date of December 25, 2021.

Outside the building in a fenced area were two baghouse hoppers connected to two 55-gallon containers (Photograph #2). The containers collect the spent plastic media blast (PMB) from a blasting media unit. The PMB waste (D006 and D007) containers were dated January 19, 2022. The containers were marked with a DOT class 9 diamond indicating a "Miscellaneous" hazard.

The inspectors observed unacceptable hazard content markings which is a facility wide concern. The containers including the universal waste aerosols container, were marked with a DOT Class 9 diamond indicating a "Miscellaneous" hazard with 'toxic' written on the label or with a DOT Toxic Class 6 label (Photograph #3). The inspectors explained to the facility that this is an unacceptable hazard content marking as per 40 C.F.R. § 262.15(a)(5). On March 8, 2022, email, (b) (6) stated that he would conduct a visual inspection of all hazardous waste containers to address the unacceptable hazard content marking labels and ensure that all hazardous waste containers in compliance with the applicable hazard content marking requirements as per 40 C.F.R. § 262.15(a)(5)(ii).

Pursuant to Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.15(a)(5)(ii)], which is a condition of the SAA Permit Exemption, a generator must mark or label its containers with the following: (ii) an indication of the hazards of the contents (examples include, but are not limited to, the applicable hazardous waste characteristic(s) (i.e., ignitable, corrosive, reactive, toxic); hazard communication consistent with the Department of Transportation requirements at 49 C.F.R. part 172 subpart E (labeling) or subpart F (placarding); a hazard statement or pictogram consistent with the Occupational Safety and Health Administration Hazard Communication Standard at 29 C.F.R. 1910.1200; or a chemical hazard label consistent with the National Fire Protection Association code 704).

Building 1853

In Building 1853 hanger, primarily paint work is conducted on aircrafts. Two contractors utilize the building with the operations conducted and waste accumulated separately. On one side, the inspectors observed three 55-gallon containers of hazardous paint rags/debris, fuel/alcohol rags, and adhesive waste; one 55-gallon container of non-hazardous oily rags, and one 5-gallon bucket of universal waste batteries in an office/procurement area. The 5-gallon bucket of batteries was dated with an accumulation start date of December 25, 2021.

On the other side of the building, the inspectors observed four 21-gallon flip-top containers of hazardous aerosol cans, hazardous fuel/alcohol rags, and a non-hazardous oily rags stored in the SAA. The fourth container of fuel/alcohol rags was empty. The facility representative stated that the flip-top containers are transported and emptied into 55-gallon containers maintained in Building 1854's SAA. The inspectors explained that consolidation and storing of hazardous waste in a different location or a building is not considered a SAA container. The waste transported from Building 1853 to Building 1854's SAA is not "at or near" the point of generation and is not "under the control of an operator." A SAA container must be in the same area where the waste is generated. If NAS Pensacola continue to consolidate hazardous waste in Building 1854 then hazardous waste containers in Building 1854 should be managed as a 90-day hazardous waste storage area and containers must be marked with an accumulation start date and inspected weekly. On March 8, 2022, email, (b) (6) stated that hazardous waste would no longer be moved to a separate SAA location or building and provided a photo of the area with the flip-top containers replaced with 55-gallon containers at the point of generation.

Pursuant to Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.15(a)], and is a condition of the SAA Permit Exemption, a generator may accumulate as much as 55 gallons of non-acute hazardous waste and/or either one quart of liquid acute hazardous waste listed in § 262.31 or § 262.33(e) of this chapter or 1 kg (2.2 lbs) of solid acute hazardous waste listed § 262.31 or § 262.33(e) of this chapter 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 interim status and without complying with the requirements of parts 124, 264 through 267, and 270 of this chapter, provided that all of the conditions for exemption in this section are met.

Building 1854 Blue Angel Hangar

Building 1854 is designated for the servicing, maintenance, and repair of the Blue Angels aircraft. The west side of the hangar is designated for the servicing, maintenance, and repair of the Blue Angel aircrafts. The facility representative stated that Blue Angel Team is at their winter training location in California. At the time of inspection, there were no SAA containers on the west side of the hangar.

The east side of the hangar is operated by a contractor for the maintenance/repair of aircraft. The inspectors observed three closed 55-gallon containers of hazardous fuel/alcohol rags, paint rags, and adhesive waste; a 55-gallon container of non-hazardous oily rags; and one 55-gallon container of universal waste aerosol cans. The aerosol can container had an accumulation start date of August 11, 2021. In an office/procurement area SAA, the inspectors observed one 5-gallon bucket of universal waste alkaline batteries dated December 5, 2021, one 5-gallon bucket lithium batteries dated November 23, 2021, and a 5-gallon bucket of hazardous Alodine rags/waste.

Building 2644 Fuel Farm

The fuel farm area is operated by the fuel contractor who manages the bulk fuel farm. The fuel farm contractor distributes fuel to the fueling tanks located throughout the base and conducts maintenance/repair on their vehicles in this area. At the time of inspection, the inspectors observed three closed 55-gallon containers of hazardous fuel filters, fuel rags, and gas/oil/water mix. In addition, there was a 55-gallon container of used oil filters and a 30-gallon container of used oil.

Building 38 Port Operations

The Inspectors visited the Port Operations area is located immediately adjacent to the Pensacola Bay. The Port Operations staff indicated that work/repairs on marine vessels and equipment take place at the dock or inside Building 38. There are two SAA storage lockers managed by separate contractors (Photographs #4-5). One locker is maintained by the Port Operations. The Port Operation staff indicated that occasionally staff from another building or contractor may bring waste to the second SAA storage locker in Building 38. The inspectors indicated that SAA containers be established “at or near” the point of generation and must be “under the control of the operator.” Consolidating or bringing hazardous waste into containers not located at or near the point of generation does not meet the SAA container requirements per 40 C.F.R. § 262.15(a). At the time of inspection, Port Operations locker contained two 55-gallon containers of hazardous fuel filters and gas/oil/water mix; and two 55-gallon containers of non-hazardous antifreeze and used oil. The second locker contained one 5-gallon container of hazardous diesel fuel/fuel filters and two 55-gallon containers of non-hazardous antifreeze and used oil.

Pursuant to Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.15(a)], and is a condition of the SAA Permit Exemption, a generator may accumulate as much as 55 gallons of non-acute hazardous waste and/or either one quart of liquid acute hazardous waste listed in § 262.31 or § 262.33(e) of this chapter or 1 kg (2.2 lbs) of solid acute hazardous waste listed § 262.31 or § 262.33(e) of this chapter 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 interim status and without complying with the requirements of parts 124, 264 through 267, and 270 of this chapter, provided that all of the conditions for exemption in this section are met.

Building 3460 Mega Building

Building 3460 is known as the Mega Building. It is a building encompassing classroom and lab facilities utilized by Navy, Marine, and Air Force personnel for education and training purposes. There are various SAAs maintained throughout the building and the trainings are conducted in the labs. The labs varied with paint booths, bead blast media units, and maintenance equipment. The inspectors inspected the following SAAs in the building:

Lab 2812-there were two small paint booths adjacent to the paint blast unit. There were two 55-gallon containers of hazardous paint waste and paint rags; and two 5-gallon containers of Alodine rags and Alodine waste. The lab staff stated that paint booth filters are removed when the paint booth meter indicates a specified air resistance on the filters. The contractor removes the paint booth filters as hazardous waste and transport them directly to the 90-day storage area. Outside Building 3460, there was a baghouse hopper connected to a 55-gallon container of hazardous spent paint chips/plastic blast media. The baghouse hopper (Photograph # 6) is connected to a paint blast media unit in Lab 2812.

Lab 2811-the inspectors observed two 55-gallon containers of hazardous paint waste and paint rags, one 5-gallon container of Alodine waste, and a 5-gallon container of Alodine rags.

Lab 1612-the inspectors observed two 55-gallon containers of hazardous paint waste and paint/thinner rags.

Lab 2651-the inspectors observed three 55-gallon containers of hazardous oil contaminated with metals, dielectric solvent waste, and test patches with metals; one 55-gallon container of non-hazardous oily rags; one 15-gallon container of hazardous aerosol cans; and a 5-gallon container of universal waste lithium batteries dated November 18, 2021 (Photograph #7).

Lab 1420-the inspectors observed one 55-gallon container of hazardous fuel rags.

Lab 1422-the inspectors observed two 55-gallon container of non-hazardous penetrant waste oil and penetrant waste oil rags; one 5-gallon container of hazardous aerosol cans; and one 35-gallon container of hazardous MagnaFlux waste.

The inspectors waited approximately thirty minutes and were not able to enter a lab SAAs during the inspection because no one was able to find the key or get in touch with a point of contact. NAS Pensacola staff were aware of the EPA and FDEP inspection prior to the inspection date. Not able to access hazardous waste storage areas raises safety concerns in the event of an emergency and prevented inspection for the purpose of ascertaining compliance with applicable hazardous waste regulations.

Pursuant to 42 U.S.C § 6927(a), for purposes of developing or assisting in the development of any regulation or enforcing the provisions of this chapter, any person who generates, stores, treats, transports, disposes of, or otherwise handles or has handled hazardous wastes shall, upon request of any officer, employee or representative of the Environmental Protection Agency, duly designated by the Administrator, or upon request of any duly

designated officer, employee or representative of a State having an authorized hazardous waste program, furnish information relating to such wastes and permit such person at all reasonable times to have access to, and to copy all records relating to such wastes. For the purposes of developing or assisting in the development of any regulation or enforcing the provisions of this chapter, such officers, employees or representatives are authorized (1) to enter at reasonable times any establishment or other place where hazardous wastes are or have been generated, stored, treated, disposed of, or transported from; (2) to inspect and obtain samples from any person of any such wastes and samples of any containers or labeling for such wastes.

In addition, per Rule 62-730.150(6), F.A.C. and 403.091(1)(a), Florida Statutes (F.S.), any duly authorized representative of the FDEP may at any reasonable time enter and inspect, for the purpose of ascertaining the state of compliance with the law or rules and regulations of the FDEP, any property, premises, or place, except a building which is used exclusively for a private residence.

Building 684-A (90-Day Storage Area)

Building 684-A is the main less than 90-day hazardous waste storage area for the NAS Pensacola. The entire 90-day area facility is fenced in and has the appropriate signage on the gate (Photograph #8). It is a large warehouse building with an outdoor covered garage port and indoor storage space. Hazardous, non-hazardous wastes, and used oil containers are stored under the covered garage port. Hazardous, non-hazardous wastes, universal waste, and a lamp crushing unit are located inside the building. Immediately adjacent to Building 684-A is Building 684. The facility personnel described Building 684 is a specially designed hazardous materials storage building with built in divided storage aisles and spill containment trench system to prevent the release of waste to the outside environment (Photograph #9). Due to national incinerator backlog issues, NAS Pensacola began storing hazardous waste longer than 90-days in Building 684-A and Building 684. NAS Pensacola has been working with FDEP since June 2021 to ensure hazardous waste storage extension requests were submitted in accordance with 40 C.F.R. § 262.17(b).

Outside Storage Area-the inspectors observed approximately fifty hazardous waste containers (ranging from 5-gallon to 55-gallon, plus two overpacks) of fuel filters, adhesive wastes, paint wastes, paint rags, waste from aerosol cans, spill debris, and spent blast media (Photograph #8). The oldest accumulation start date observed in the outdoor area was August 24, 2021 (waste storage extension beyond 90-day was approved by FDEP). There were approximately forty containers (ranging from 1-gallon to 55-gallon) of non-hazardous waste including used oil.

The inspectors observed the outside storage area is not bermed and not sloped to contain accidental releases. In addition, pallets of hazardous waste containers were placed at the edge of the concrete on the east side of the structure. The containers were placed beyond the painted setback lines. The inspectors raised concerns at the proximity of the hazardous waste containers to the soil and the pad not appropriately sloped. At a minimum, a buffer between the edge of the concrete and container placement should be established to ensure the facility is maintained and operated to minimize the possibility of a sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water per 40 C.F.R. § 262.251. On April 25, 2022, (b) (6) provided a photo of the established setback near the edge of the concrete with all containers appearing away from the edge of the concrete. In addition, he stated a work order has been submitted to have the setback lines repainted.

In the indoor storage area, the inspectors observed thirty-four hazardous containers (ranging from 2-gallon to 55-gallons and one cubic yard boxes) of solvent waste, coil cleaner, oily rags contaminated with cadmium/metals and paint booth filter (Photographs #10-11). The oldest accumulation start date of the container was April 1, 2021 (waste storage extension was provided by FDEP). There was a lamp crushing device attached to a 55-gallon container (Photograph #12). There were nineteen various size containers of universal waste containing various types of aircraft batteries, lamps, mercury switches, and crushed fluorescent lamps.

The indoor storage area was congested with containers placed closely together and some containers were also noted over the edges of the pallets (Photographs #10-11 and #13-14). Adequate aisle space was not observed in the indoor storage area. The inspector's movement was obstructed to inspect all containers due to no aisle space.

Pursuant to Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.17(a)(6)], which incorporates Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.255], and is a condition of the LQG Permit Exemption, a generator must 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.

At the time of inspection, Building 684 was mostly empty, except for the backlogged hazardous waste stored in the building (Photograph #9). The inspectors observed approximately seventy hazardous containers (ranging from 1-gallon to 55-gallon) paint and adhesive wastes. The oldest accumulation start date observed was April 29, 2021 (waste storage extension was approved by FDEP).

The inspectors highly recommend that NAS Pensacola relocate their main 90-day hazardous waste storage area to Building 684 which is specifically designed to store hazardous waste. Storing of hazardous waste in Building 684 will ensure compliance with 40 C.F.R. §§ 262.17 (conditions for exemption for a large quantity generator that accumulates hazardous waste), 262.251 (maintenance and operation of facility), and 262.255 (required aisle space) and no chance of sudden or non-sudden releases of hazardous waste during an extreme weather event.

Records Review

The records reviewed included hazardous waste manifests/associated land disposal restriction (LDR) records, waste profiles, universal waste manifests, weekly inspection logs, waste minimization plan, personnel training documents, job descriptions, contingency plan, and used oil records.

Hazardous waste manifests were reviewed from May 2021 to February 2022. According to reviewed manifests, TAS Environmental Services (TXR000061283) and (b) (6) (ALD067138891) were the registered transporters for hazardous wastes. The designated treatment, storage and disposal facility was Clean Earth of Calvert City (KYD985073196). The review of the manifests indicated that crushed mercury lamps (from the lamp crushing unit in the 90-day storage area) are being sent offsite as "Non-RCRA solids, D.O.T., Non-regulated (Crushed Glass)". Following the FDEP June 2021 inspection, NAS Pensacola indicated that the facility will be managing their waste lamps as universal waste and crushing to reduce storage volume per 62-737, F.A.C. and intend to manifest and ship off-site crushed universal waste lamps.

Pursuant to Fla. Admin. Code Ann. r. 62-737.400(6)(b), F.A.C., a generator of universal waste lamps may use crushing equipment on-site to reduce the volume of the stored lamps provided that: this is done in a final accumulation container; the lamps are crushed in a controlled manner that prevents the release of mercury vapor or other contaminants; the crushing operations and maintenance of the unit are performed in accordance with written procedures developed by the manufacturer of the equipment including specific instructions for the frequency of filter changes; and the employees using this equipment are thoroughly familiar with these written procedures and emergency procedures should equipment malfunction occur.

Pursuant to Fla. Admin. Code Ann. r. 62-737.150(1), F.A.C., generators, transporters, and facilities managing or disposing of spent mercury-containing lamps or devices in a manner other than recycling as provided for under this chapter are not subject to the provisions of this chapter, but shall comply with 40 C.F.R. 262.11, as adopted by reference under Rule 62-730.160, F.A.C., and all other applicable Department and federal regulations including Rules 62-737.300 and 62-701.300, F.A.C.

Pursuant to Fla. Admin. Code Ann. r. 62-737.400(1), F.A.C., (a) all universal waste lamp or device handlers and transporters shall comply with the applicable 40 C.F.R. Part 273 requirements [as adopted in subsection 62-737.150(2), F.A.C.], and the requirements of this chapter; (b) In addition, handlers and transporters of spent universal waste lamps or devices shall only ship these lamps or devices to a handler or universal waste lamp or device destination facility.

Weekly inspections of the two 90-day central accumulation areas, Buildings 684A and Building 3580, were reviewed from May 2021 through February 2022. The environmental staff completing the weekly inspections were noted as (b) (6)

(b) (6) and (b) (6). Several weekly inspection records indicated that facility staff did not print their name on the weekly inspection logs. The log showed staff's initials.

Pursuant to Fla. Admin. Code Ann. r. 62-730.160(3), F.A.C., generators of hazardous waste who accumulate hazardous waste on-site under 40 C.F.R. §§ 262.16, and 262.17 [as adopted in subsection 62-730.160(1), F.A.C.], shall maintain written documentation of the inspections required under 40 C.F.R. 262.16 and 262.17 [as adopted in subsection 62-730.160(1), F.A.C.]. The generator shall keep the written documentation of the inspections under this section for at least three years from the date of the inspection. At a minimum, this documentation shall include the date and time of the inspection, the legibly printed name of the inspector, the number of containers, the condition of the containers, a notation of the observations made, and the date and nature of any repairs or other remedial actions.

Trainings records were reviewed for (b) (6)

(b) (6) and (b) (6). One individual, (b) (6), listed as an inspector on one weekly inspection logs, did not have training records available. The facility explained the individual left the position prior to receiving the required training.

The inspectors stated that pursuant to Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.17(a)(7)(iii)], which is a condition of the LQG Permit Exemption, facility personnel must successfully complete the program required in paragraph (a)(7)(i) of this section

within six months after the date of their employment or assignment to the facility, or to a new position at the facility, whichever is later. Employees must not work in unsupervised positions until they have completed the training standards of paragraph (a)(7)(i) of this section.

The inspectors reviewed RCRA job description positions for WhiteTail (NAS Pensacola contractor) employees including the environmental coordinator, environmental site manager, and environmental technician positions. The job description did not include the name of the person filling the position nor the requisite skill, education, or other qualifications and training needed for the positions. On April 8, 2022, the inspectors requested position description for the NAS Pensacola hazardous waste program manager. On April 12, 2022, (b) (6) provided a copy of the roles and responsibilities of personnel outlined in the facility hazardous waste management plan. The plan did not contain the name of the person filling the position nor the requisite skill, education, or other qualifications and training needed for the positions.

Pursuant to Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.17(a)(7)(iv)(A)], and is a condition of the LQG Permit Exemption, the large quantity generator must maintain the following documents and records at the facility: (A) the job title for each position at the facility related to hazardous waste management, and the name of the employee filling each job.

In addition, Pursuant to Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.17(a)(7)(iv)(C)], and is a condition of the LQG Permit Exemption, the large quantity generator must maintain a written description of the type and amount of both introductory and continuing training that will be given to each person filling a position listed under paragraph 262.17(a)(7)(iv)(A) of this section.

The contingency plan (CP) was reviewed for NAS Pensacola. The CP was last updated in March 2021. NAS Pensacola made changes to the CP due to an increase of waste onsite through accumulation extensions during the national incinerator backlog. The contingency plan reviewed included a quick reference guide. The CP appeared to be complete per 40 C.F.R. Sections 264 Subpart D and 262 Subpart M. Records review indicated that used oil is transported by Oil Recovery Inc. (GAR000054460).

11) Closing Conference

NAS Pensacola was inspected as a large quantity generator of hazardous waste and a small quantity handler of universal waste. On April 20, 2022, an exit meeting was conducted, via MS Teams, with (b) (6) to discuss the inspection and request additional information. The inspectors discussed the areas visually inspected, SAA, accumulation of hazardous waste at the point of generation, operating the facility to minimize potential for sudden or non-sudden releases of hazardous waste, aisle space, indication of the hazards of the contents, labeling of universal waste, crushed mercury lamps, weekly inspection records, and position descriptions/training requirements. The facility agreed to provide an inventory of the waste in the 90-day central accumulation area at the time of inspection, documentation of final disposition of crushed mercury glass, and job description/training records. On April 22, 2022, NAS Pensacola provided the documents requested during the closing conference.

12) **Signed**

	PARVEZ MALLICK	Digitally signed by
		PARVEZ MALLICK
		Date: 2022.05.09 10:32:31 -04'00'
	Parvez Mallick	

Inspector and Author of Report

Date

13) **Concurrence and Approval**

	ARACELI CHAVEZ	Digitally signed by
		ARACELI CHAVEZ
		Date: 2022.05.09 17:04:02 -04'00'
	Araceli B. Chavez	

Chief
RCRA Enforcement Section

Date

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Compliance Evaluation Inspection photographs were taken by (b) (6) of EPA
Canon PowerShot SD980 IS - EPA Property Number S75319



Photograph #1 - Building (b) (3) (A)



Photograph #2 - (b) (3) (A) spent plastic blast media container.



Photograph #3 - (b) (3) (A)



Photograph #4 - (b) (3) (A)



Photograph #5: (b) (3) (A)



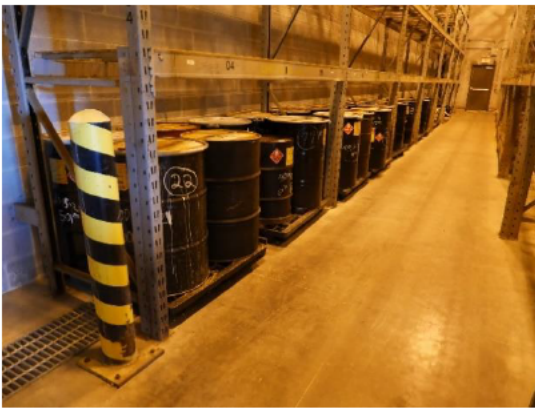
Photograph #6: (b) (3) (A)



Photograph #7 – (b) (3) (A)



Photograph #8 – (b) (3) (A)



Photograph #9 – (b) (3) (A)



Photograph #10 – (b) (3) (A)



Photograph #11 – (b) (3) (A)



Photograph #12 – (b) (3) (A)



Photograph #13 – (b) (3) (A)

(b) (3) (A)



Photograph #14 – (b) (3) (A)

(b) (3) (A)