

RCRA Inspection Report

1) Inspector and Author of Report

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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.
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2) Facility Information

U.S. Army Garrison Fort Knox
111 E. Chaffee Ave, BLDG 1101
Fort Knox, Kentucky 40121

EPA ID#: KY6210020479
NAICS #: 928110 – National Security

3) Responsible Officials

(b) (6)
Chief of Compliance

(b) (6)

4) Inspection Participants

(b) (6) U.S. Army Garrison Fort Knox
(b) (6), U.S. Army Garrison Fort Knox
(b) (6), U.S. Army Garrison Fort Knox
(b) (6), Kentucky Department of Environmental Protection (KYDEP)
(b) (6), KYDEP
(b) (6), KYDEP
(b) (6), U.S. Environmental Protection Agency (EPA)

5) Date of Inspection

January 30, 2024, at 9:30 A.M. to 4:00 P.M.

January 31, 2024, at 9:00 A.M. to 11:00 A.M.

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; Kentucky Revised Statutes Title XVIII, Chapter 224, Subchapter 46-Hazardous Waste *et seq.* (2006), and Title 401 of the Kentucky Administrative Regulations (K.A.R.) Chapters 30 through 38, 43 and 44 (2006)

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 401 KAR 39:005, Section 1 [40 C.F.R. § 260.10], a large quantity generator of hazardous waste (LQG) 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 401 KAR 39:080, Section 3(1) [40 C.F.R. § 273.9], a large quantity handler of universal waste (SQHUW) is a universal waste handler who accumulate 5,000 kilograms or more of universal waste (batteries, pesticides, mercury-containing equipment, lamps, or aerosol cans, calculated collectively) at any time.

Pursuant to 401 KAR 39:080, Section 1(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 KRS § 224.46-520 [Section 3005 of RCRA, 42 U.S.C. § 6925], and without complying with 401 KAR 39:080, Section 1(1) [40 C.F.R. § 262.16(b) or § 262.17(a)], except as required in 401 KAR 39:080 [40 C.F.R. § 262.15(a)(7) and (8)], provided that the generator complies with the satellite accumulation area conditions listed in KAR 39:080, Section 1(1) [40 C.F.R. § 262.15(a)] (hereinafter referred to as the “SAA Permit Exemption”).

Pursuant to 401 KAR 39:080, Section 1(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 KRS § 224.46-520 [Section 3005 of RCRA, 42 U.S.C. § 6925], provided that the generator complies with the conditions listed in 401 KAR 39:080, Section 1(1) [40 C.F.R. § 262.17] (hereinafter referred to as the “LQG Permit Exemption”).

Pursuant to 401 K.A.R. 39:060, Section 3(1) [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 401 K.A.R. 39:060, Section 3(1) [40 C.F.R. § 261.4(b)(18)] are met (hereinafter referred to as the “Solvent-Contaminated Disposable Wipe Exclusion”).

Pursuant to 401 K.A.R. 39:060, Section 3(1) [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 401 K.A.R. 39:060, Section 3(1) [40 C.F.R. § 261.4(a)(26)] are met (hereinafter referred to as the “Solvent-Contaminated Reusable Wipe Exclusion”).

7) Purpose of Inspection

The purpose of this inspection was to conduct an unannounced compliance evaluation inspection to determine U.S. Army Garrison Fort Knox’s compliance with the applicable requirements of RCRA and the corresponding Kentucky regulations. This was an EPA lead inspection.

8) Facility Description

U.S. Army Garrison Fort Knox (known hereinafter as Fort Knox or the facility) is one of the most multifunctional installations of the U.S. Army. Fort Knox became a permanent training center in 1918 and turned into a permanent army garrison in January 1932. Fort Knox is home to more than 30 units, commands, and organizations. Some of the units and organizations that operate out of Fort Knox include U.S. Army Forces Command Deployable Units, Reserve Component Training Units, U.S. Army Cadet Command, and U.S. Army Recruiting Command. These organizations are responsible for identifying, educating, and recruiting the Army's newest officers and soldiers. The commander of Cadet Command also serves as the installation's commanding general. In addition, the U.S. Army Human Resources Command manages all soldiers' personnel actions, from initial enlistment through retirement and beyond.

Fort Knox consists of 109,000 acres of land and operates 24 hours a day seven days a week with a daytime population of about 26,000 soldiers, civilian employees, and family members. Fort Knox employs approximately 140 workers for the army installation's day-to-day operations. The entry gates into Fort Knox consist of armed security, and a visitor pass is required for entry.

Fort Knox first notified of its regulated waste activity on March 1, 1990, as a LQG of hazardous waste. The facility most recently notified as a LQG on August 29, 2022. The facility has several machine shops, maintenance shops, and assembly shops which generate a variety of hazardous waste onsite. These hazardous wastes include ignitable waste (EPA Waste Code D001), corrosive waste (EPA Waste Code D002), reactive waste (EPA Waste Code D003), and EPA listed wastes shown below.

D-Codes: Toxicity Characteristic												
D005	D006	D007	D008	D009	D010	D011	D012	D013	D014	D015	D016	D017
D018	D019	D020	D021	D022	D023	D024	D025	D026	D027	D028	D029	D030
D031	D032	D033	D034	D035	D036	D037	D038	D039	D040	D041	D042	D043
F-Codes: Hazardous Waste from Non-specific Sources												
F001	F002	F003	F004	F005								
P-Codes: Discarded Commerical Chemical Products - Acutely Toxic												
P001	P008	P030	P081	P098	P105	P106	P119					
U-Codes: Discarded Commerical Chemical Products - Toxic												
U002	U010	U012	U031	U041	U059	U072	U077	U080	U103	U121	U123	U129
U150	U151	U154	U159	U161	U162	U165	U188	U201	U210	U218	U220	U223
U226	U228	U237	U239	U240	U248							

These hazardous wastes are managed in Satellite Accumulation Areas (SAAs) before being transported to the facility's Central Accumulation Area (CAA).

9) **Previous Inspection History**

KYDEP has conducted two RCRA CEIs at the subject facility between 2020 and 2022 and found two violations during the 2020 inspection and one violation during the 2022 inspection.

On December 21, 2022, KYDEP conducted the most recent RCRA CEI at the subject facility and found one apparent violation of RCRA's requirements for 40 C.F.R. § 262.42(a)(2) – Exception Reports for Manifests. The violation was corrected, and the facility returned to compliance.

10) Opening Conference

On January 30, 2024, EPA inspector (b) (6), accompanied by KYDEP inspectors (b) (6) arrived at Fort Knox at approximately 9:25 A.M. (b) (6) Hazardous Waste and Solid Waste Program Manager, immediately received the inspectors. (b) (6) and the inspectors were joined by (b) (6), Chief of Compliance and (b) (6), Environmental Technician, for the opening conference. The inspectors introduced themselves, showed their credentials, and explained the purpose of the visit.

The inspectors described the anticipated use of equipment (iPad and/ or digital camera) during the inspection and provided a request for records. The EPA inspector explained that the Small Business Regulatory Enforcement Fairness Act's classification of a "small business" is generally set by the Small Business Administration using the business' SIC/NAICS code and annual receipts or number of employees. A copy of the EPA's information sheet for small businesses can be found at <https://www.epa.gov/sites/production/files/2017-06/documents/smallbusinessinfo.pdf>. The EPA inspector also discussed the company's ability, pursuant to 40 C.F.R. § 2.203, to assert a business confidentiality claim for information submitted to EPA. The company did not assert a business confidentiality claim.

(b) (6) 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 representative led the inspectors on a tour of the facility operations.

11) Inspection Observations

Building 2949 - CAA:

Fort Knox manages a hazardous waste CAA in Building 2949 (Photos 1-8). The CAA is surrounded by a secured fence and is equipped with a containment sump inside the building. The CAA was identified with a sign which read "Environmental Management Hazardous Waste Storage Yard." The inspectors observed a "No Smoking" sign at the entrance of the CAA.

The CAA is equipped with an alarm system capable of providing immediate emergency instruction to facility personnel; it is equipped with a device capable of summoning emergency assistance from local emergency response; it is equipped with portable fire extinguishers, fire control equipment, spill control equipment, and decontamination equipment; and it is equipped with water to supply water hose streams, and foam producing equipment.

The inspectors observed ignitable waste, corrosive waste, reactive waste, and toxic waste in the CAA which was stored based on compatibility. Adequate aisle space was observed for the waste stored onsite. All hazardous waste containers were labeled with the words "Hazardous Waste"

and marked with an indication of the hazard of the contents, dated with an accumulation start date, and closed. The oldest accumulation start date observed was 12/06/2023 which, is compliant with the 90-day accumulation timeframe.

The CAA also stores universal waste. All universal waste containers were closed, labeled “Universal Waste” with the name of the contents, and dated with an accumulation start date. There was no universal waste stored beyond one year. The CAA also stores non-hazardous waste. All non-hazardous waste containers were closed and labeled. The inspectors requested waste determinations for three (3) non-hazardous waste containers with waste profile numbers: Non-hazardous Waste Wipes - Waste Profile #W22PES33568012, Non-hazardous Waste Rubberized Coating – Waste Profile #W22PES33408001, Non-hazardous Waste Debris AFFF in cubic yard sacks. These waste profiles were reviewed during the Records Review portion of the inspection.

Building 2778 - Vehicle Maintenance:

This area is used for vehicle maintenance and repair. The building operates a paint booth. Paint booth filters are sampled and analyzed for proper disposal. Aerosol cans are sent to the Environmental Department for evaluation on whether they can be used elsewhere or if they are completely empty and are ready for proper disposal. The inspectors observed the following hazardous waste in a SAA (Photos 9-11):

- One (1) 30-gallon cardboard box of paint chips contaminated with chromium. The box was closed, labeled with the words “Hazardous Waste”, and marked to indicate the hazard of the contents.
- One (1) 55-gallon container of waste paint-related material. The container was closed, labeled with the words “Hazardous Waste”, and marked to indicate the hazard of the contents.

Building 9312 – Training and Support Command:

The DPTMS shop within Building 9312 specializes in fabrication aids for weapons and ammunitions. There is a paint booth in the shop for weaponry. The inspectors observed the following hazardous waste:

- One (1) 55-gallon container of arsenic and lead waste. The container was closed, labeled with the words “Hazardous Waste”, and labeled “Toxic” to indicate the hazard of the contents (Photo 12).
- One (1) 55-gallon container of waste paint-related material. The container was closed, labeled with the words “Hazardous Waste”, and contained a flammable placard to indicate the hazard of the contents (Photo 13).

Building 1741 – Armory:

The armory is used for weapon storage. The inspectors observed the following waste (Photos 14 and 15):

- One (1) 5-gallon-sized cardboard box of weapons cleaning debris. The container was closed, labeled “Hazardous Waste”, and marked to indicate the hazard of the contents.

- One (1) 5-gallon container of used oily rags.

Building 1730 - PCSI Electricians:

This building is used as a maintenance facility for the army installation. This includes electrical maintenance, plumbing, and heating. Universal waste and lead acid batteries are stored at this facility. The inspectors observed the following waste (Photos 16-18):

- Six (6) cardboard boxes of universal waste spent fluorescent lamps. The containers were closed, labeled "Universal Waste", and dated. The oldest accumulation start date was 04/25/2023.
- Three (3) containers of universal waste batteries. The containers were closed, labeled "Universal Waste", and dated. The oldest accumulation start date was 11/16/2023.
- One (1) 15-gallon container of mercury waste. The container was closed, labeled "Hazardous Waste", and marked to indicate the hazard of the contents.
- One wooden pallet of used lead acid batteries to be recycled.

Building 871 – Ireland Army Health Clinic:

The onsite health clinic operates a pharmacy and clinical laboratory with each containing a SAA for hazardous waste. The clinic also has a maintenance room which stores universal waste. The inspectors observed the following waste (Photos 19-23):

- One (1) 5-gallon container of waste methanol slide stains. The container was closed, labeled "Hazardous Waste", and marked with an indication of the hazard of the contents.
- One (1) 1-gallon container of used warfarin. The container was closed, labeled "Hazardous Waste", and marked with an indication of the hazard of the contents.
- One (1) 2-gallon container of U-listed waste (loose pills). The container was closed, labeled "Hazardous Waste", and marked with an indication of the hazard of the contents.
- One (1) 1-gallon container of hazardous waste pharmaceuticals. The container was closed, properly labeled, and dated 01/29/2024.
- One (1) 1-gallon container of used silver nitrate sticks. The container was closed, labeled "Hazardous Waste", and marked with an indication of the hazard of the contents.
- Two cardboard boxes of universal waste batteries. The boxes were closed, labeled "Universal Waste", and dated 11/08/23 and 11/15/23.

Building 1022 – Valiant Medical Maintenance:

This is a maintenance building for all medical facilities on the base. The primary waste stored at this location is universal waste (Photos 24-27).

- One (1) 10-gallon container of broken fluorescent lamps. The container was closed, labeled "Hazardous Waste", and marked with an indication of the hazard of the contents.
- One (1) 8-ft cardboard box of spent fluorescent lamps. The container was closed, labeled "Universal Waste", and dated 12/30/2023.

- One (1) 4-ft cardboard box of spent fluorescent lamps. The container was closed, labeled “Universal Waste”, and dated 12/20/2023.
- Two (2) 2-ft cardboard boxes of spent fluorescent lamps. The containers were closed, labeled “Universal Waste”, and dated 05/17/2023 and 11/13/2023.
- Two (2) 2-gallon containers of used batteries labeled “Universal Waste”. The containers were closed and dated 12/20/2023.

Building 1006 – Veterinarian Clinic:

Fort Knox has a veterinary clinic equipped with a clinical laboratory. The inspectors observed one (1) 10-gallon container of used methanol slide stains (Photos 28). The container was closed, labeled “Hazardous Waste”, and marked with an indication of the hazard of the contents.

Building 122 - Binter St. Pharmacy:

This building houses another pharmacy on base which has a SAA for pharmaceutical waste. The inspectors observed one (1) 1-gallon container of hazardous waste pharmaceuticals. The container was closed, properly labeled, and dated 01/30/2024 (Photo 29 and 30).

Building 121 – Commissary:

The Commissary is the main grocery store on the army base. Universal waste lamps are generated here. The inspectors observed the following waste (Photos 31 and 32):

- One (1) 30-gallon container of broken fluorescent lamps. The container was closed, labeled “Hazardous Waste”, and marked with an indication of the hazard of the contents.
- One (1) 4-ft cardboard box of spent fluorescent lamps. The container was closed, labeled “Universal Waste”, and dated 01/10/2024.
- One (1) 8-ft cardboard box of spent fluorescent lamps. The container was closed, labeled “Universal Waste”, and dated 05/01/2023.

Building 206 – Recruiting Command, Army Material, Recognition Group:

This building is used for marketing operations and manufacturing of award plaques for recruiting battalions. The inspectors observed the following waste (Photos 33-35):

- Two (2) 1-gallon containers of universal waste batteries. Both containers were closed, labeled “Universal Waste”, and dated 06/30/2023 and 12/11/2023.
- One (1) 55-gallon container of used paint thinner. The container was closed, labeled “Hazardous Waste”, and marked to indicate the hazard of the contents.
- One (1) 5-gallon container of used solvent wipes. The container was labeled “Excluded Solvent-contaminated Wipes”, closed, and dated 10/18/2023.

Depending on the contractor and shop, excluded solvent-contaminated wipes are sent for disposal or laundered.

Building – 7224 K-9 Unit:

This building is a kennel and training center for military canine. This facility generates sodium chlorate waste and potassium chlorate waste which is used to train canine to detect explosives. The inspectors observed two (2) 5-gallon containers for used sodium chlorate and potassium chlorate (Photo 36). Both containers were closed, labeled “Hazardous Waste”, and marked to indicate the hazard of the contents.

Building 1327 – IHG Hotel:

The hotel onsite generates universal waste and hazardous waste from maintenance activities. The inspectors observed the following waste (Photos 37 and 38):

- One (1) 10-gallon container of broken fluorescent lamps. The container was closed, labeled “Hazardous Waste”, and marked to indicate the hazard of the contents.
- One (1) 3-gallon cardboard box for used batteries. The box was closed, labeled “Universal Waste”, and dated 01/29/2024.
- One (1) 4-ft cardboard box of spent fluorescent lamps. The box was closed, labeled “Universal Waste”, and dated 01/29/2024.
- Two (2) 2-ft cardboard boxes of spent fluorescent lamps. The box was closed, labeled “Universal Waste”, and dated 10/16/2023 and 01/29/2024.
- One (1) closed 5-gallon container of lead-acid batteries.

Building 5222 – Godman Airfield:

The army airfield has a hanger which stores universal waste. The inspectors observed two (2) 1-gallon containers of used batteries. Both containers were closed, labeled “Universal Waste”, and dated 01/10/2024 (Photo 39).

Building 3074 – Ammo Supply Point:

Fort Knox houses ammunition in a series of bunkers. Building 3074 is amid these bunkers and is where materials are collected for recycling or waste disposal. There is a SAA container used to store hazardous waste fuse igniters (D006). The inspectors observed one (1) 55-gallon container of fuse igniters. The container was closed, labeled “Hazardous Waste”, and marked to indicate the hazard of the contents (Photo 40).

Building 2954 – Universal Waste Storage:

Building 2954 is a maintenance building which mainly stores universal waste and has an SAA for broken fluorescent lamps. The inspectors observed the following waste (Photos 41 and 42):

- Four (4) 1-ft cardboard boxes of used batteries. The boxes were closed, labeled “Universal Waste”, and dated. The oldest accumulation start date was 09/05/2023.
- One (1) 5-gallon container of used mercury equipment. The container was closed, labeled “Universal Waste”, and dated 04/05/2023.
- One (1) 15-gallon container of broken lamps. The container was closed, labeled “Hazardous Waste”, and marked to indicate the hazard of the contents.

- Three (3) 2-ft cardboard boxes of spent fluorescent lamps. The boxes were closed, labeled “Universal Waste”, and dated. The oldest accumulation start date was 09/19/2023.
- One (1) 4-ft cardboard box of spent fluorescent lamps. The box was closed, labeled “Universal Waste”, and dated 08/24/2023.

Day 2 of the Compliance Evaluation Inspection – January 31, 2024

The inspectors were joined (b) (6) KYDEP Inspector for Day 2 of the inspection due to DeAnna Williams not being able to attend the second day of the inspection.

Building 9826 – Andrew’s Shoot House:

Andrew’s Shoot House is a shooting range for used by military personnel and occasionally law enforcement. Lead waste is generated from floor sweepings that accumulate from target practice. The inspectors observed one (1) 55-gallon container of floor sweepings. The container was closed, labeled “Hazardous Waste”, and marked to indicate the hazard of the contents (Photo 43).

12) Records Review

Contingency Plan and Quick Reference Guide (QRG):

The actions that facility personnel should take in response to an emergency are described in the facility’s Contingency Plan, which was last updated in April 2021.

The plan describes actions facility personnel must take in response to fires, explosions, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water at the facility. The plan describes arrangements agreed to with the local police department, fire department, other emergency response teams, emergency response contractors, equipment suppliers, local hospitals or the Local Emergency Planning Committee. The plan lists the names and emergency telephone numbers for persons identified as emergency coordinators. The Shift Operations Supervisor for Fort Knox Fire Department is listed as the primary emergency coordinator, and other Shift Operations Supervisors from the Installation Operations Center are listed as alternates.

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

A copy of the Contingency Plan (and its quick reference guide) was most recently submitted to Fire Chief (b) (6) on 12/21/2022 and then distributed to the other fire stations on the

base. There are three fire stations in Fort Knox. One is located on the airfield, one located in the Main Post, and one located on the outskirts of the army installation.

The quick reference guide includes the types/names of hazardous waste in layman's terms and the associated hazard associated with each hazardous waste present at any one time; the estimated maximum amount of each hazardous waste that may be present at any one time; the identification of any hazardous wastes where exposure would require unique or special treatment by medical or hospital staff; a map of the facility showing where hazardous wastes are generated, accumulated and treated and routes for accessing these wastes; a street map of the facility in relation to surrounding businesses, schools and residential areas; the locations of water supply; the identification of on-site notification systems; and the name of the emergency coordinator(s) and emergency telephone number(s).

Training Records:

The inspectors reviewed facility job descriptions and employee names that were provided for (b) (6), Environmental Protection Specialist; (b) (6), Environmental Technician; (b) (6), Environmental Technician, and (b) (6), Environmental Protection Specialist (no longer works in this department). Each description included the requisite skill, education, or other qualifications, and duties of facility personnel assigned to that position.

The facility provided a written description of the type and amount of both introductory and continuing training to be given to each person filling the positions listed above. This includes RCRA 8-hour training, D.O.T. HAZMAT Ground Shipper Certifications, D.O.T. HAZMAT with Highway Requirements, D.O.T. HAZMAT Employee Packaging training. The inspectors reviewed records of employee hazardous waste training completed in 2021-2023.

Waste Manifest and Land Disposal Restriction (LDR) Records:

The inspectors reviewed available hazardous waste manifest records and land disposal restriction forms for shipments of hazardous waste sent since 2021. Hazardous waste manifest records show that hazardous waste is routinely shipped to Clean Earth of Calvert City (EPA ID KYD985073196), Environmental Enterprises Inc. (EPA ID OHD083377010), and Clean Harbors El Dorado (EPA ID ARD069748192). The most recent shipment was made on 12/28/2023 and one shipment was in the process of being picked up on 01/31/2024.

Manifests were free of errors and waste was shipped to the final TSDF within the 45-day timeframe. Land Disposal Restriction notices were also available for review. Universal waste is shipped to LEI, Inc. in Independence, LA (EPA ID LAR000055467).

Weekly Inspection Records:

The inspectors reviewed the facility's available records of inspections of the hazardous waste central accumulation area (CAA) since January 6, 2021. The inspection log includes a checklist to record observations about leaking containers and for deterioration of containers caused by

corrosion or other factors. The inspection log includes a checklist to record observations for container conditions, signs of leaks, closed containers, and proper labeling. The records include the date and time of the inspection and the name, signature, and initials of the employee conducting the inspection. Employees do routinely record inspection observations and subsequent follow-up actions on the inspection log.

Waste Determinations and Waste Profiles:

Fort Knox utilizes Fouser Environmental for all laboratory waste analysis. Waste profiles and laboratory analysis documents were available for review for all waste streams including the three (3) non-hazardous waste streams in the CAA.

SAA Manager's Book:

A SAA Manager's Book is located in each SAA around the army installation. The book includes training certificates for employees handling hazardous waste, SAA management procedures and requirements, weekly inspections (not required for RCRA but required for Fort Knox to ensure compliance), safety data sheets, and emergency contact numbers.

Waste Minimization Plan:

The facility provided their waste minimization plan for review. No issues were noted.

13) Closing Conference

The inspectors conducted the exit meeting on January 31, 2024, with (b) (6) [REDACTED] During this meeting, the inspectors stated their preliminary conclusions of the inspection.

14) List of Appendices

Appendix 1 – Photo Log:

15) Signed

(b) (6) [REDACTED]

(b) (6) [REDACTED]
Physical Scientist

16) Concurrence

(b) (6) [REDACTED]

(b) (6) [REDACTED]
RCRA Enforcement Section

Appendix 1 – Photo Log

[43] Photos taken on: [January 30-31, 2024]

Photos taken by: (b) (6)

Photos taken with: iPad

EPA Property Tag: SS8386



Photo 1	IMG-202401301022092295859990.jpg
01/30/2024 10:22 AM (ET)	Photographer: (b) (6)
Building 2949 Central Accumulation Area	



Photo 2	IMG-2024013010234023402368064.jpg
01/30/2024 10:23 AM (ET)	Photographer: (b) (6)
Building 2949 Central Accumulation Area	



Photo 3	IMG-2024013010234523452456504.jpg
01/30/2024 10:23 AM (ET)	Photographer: (b) (6)
Building 2949 Central Accumulation Area	



Photo 4	IMG-2024013010384238422510707.jpg
01/30/2024 10:38 AM (ET)	Photographer: (b) (6)
Building 2949 Central Accumulation Area	



Photo 5	IMG-202401301039083982597636.jpg
01/30/2024 10:39 AM (ET)	Photographer: (b) (6)
Building 2949 Central Accumulation Area	



Photo 6	IMG-2024013010402040202410628.jpg
01/30/2024 10:40 AM (ET)	Photographer: (b) (6)
Building 2949 Central Accumulation Area	



Photo 7	IMG-2024013010444544452894222.jpg
01/30/2024 10:44 AM (ET)	Photographer: (b) (6)
Building 2949 Central Accumulation Area: Entrance	



Photo 8	IMG-2024013010454945495017669.jpg
01/30/2024 10:45 AM (ET)	Photographer: (b) (6)
Building 2949 Central Accumulation Area: Entrance	



Photo 9	IMG-2024013010554155412370758.jpg
01/30/2024 10:55 AM (ET)	Photographer: (b) (6)
Building 2778 Vehicle Maintenance: Hazardous waste paint chips with chromium.	



Photo 10	IMG-202401301058025822558177.jpg
01/30/2024 10:58 AM (ET)	Photographer: (b) (6)
Building 2778 Vehicle Maintenance: Paint product storage	



Photo 11	IMG-20240130110008082344331.jpg
01/30/2024 11:00 AM (ET)	Photographer: (b) (6)
Building 2778 Vehicle Maintenance: 55-gallon container of hazardous waste paint-related material.	



Photo 12			IMG-2024013011122512251328970.jpg
01/30/2024 11:12 AM (ET)	No CBI	No PII	Photographer: (b) (6)
Building 9312 Training and Support Command: Hazardous Waste SAA for arsenic and lead waste.			



Photo 13	IMG-2024013011142914291210011.jpg
01/30/2024 11:14 AM (ET)	Photographer: (b) (6)
Building 9312 Training and Support Command: 55-gallon container of hazardous waste paint-related material.	



Photo 14	IMG-202401301127092791226589.jpg
01/30/2024 11:27 AM (ET)	Photographer: (b) (6)
Building 1741 Armory: Cardboard box containing hazardous waste weapons cleaning debris and empty universal waste container.	



Photo 15	IMG-2024013011274627461214171.jpg
01/30/2024 11:27 AM (ET)	Photographer: (b) (6)
Building 1741 Armory: Container of clean rags and container of used oily rags.	



Photo 16	IMG-202401301134033431280072.jpg
01/30/2024 11:34 AM (ET)	Photographer: (b) (6)
Building 1730 PCSI Electricians: Universal waste battery storage.	



Photo 17	IMG-2024013011341834181341396.jpg
01/30/2024 11:34 AM (ET)	Photographer: (b) (6)
Building 1730 PCSI Electricians: Cardboard boxes of universal waste lamps and hazardous waste broken lamp container.	



Photo 18	IMG-2024013011342834281267971.jpg
01/30/2024 11:34 AM (ET)	Photographer: (b) (6)
Building 1730 PCSI Electricians: Used lead acid batteries.	



Photo 19	IMG-2024013011483848381264703.jpg
01/30/2024 11:48 AM (ET)	Photographer: (b) (6)
Building 871 Ireland Army Health Clinic: Universal waste batteries.	



Photo 20	IMG-2024013011513151311139234.jpg
01/30/2024 11:51 AM (ET)	Photographer: (b) (6)
Building 871 Ireland Army Health Clinic: 5-gallon container of hazardous waste methanol slide stains.	



Photo 21	IMG-20240130115306536896410.jpg
01/30/2024 11:53 AM (ET)	Photographer: (b) (6)
Building 871 Ireland Army Health Clinic: SAA in pharmacy inside Building 871.	



Photo 22	IMG-20240130115602562996660.jpg
01/30/2024 11:56 AM (ET)	Photographer: (b) (6)
Building 871 Ireland Army Health Clinic: Pharmacy SAA – hazardous waste pharmaceuticals.	



Photo 23	IMG-2024013011593159311248961.jpg
01/30/2024 11:59 AM (ET)	Photographer: (b) (6)
Building 871 Ireland Army Health Clinic: SAA for hazardous waste silver nitrate sticks.	



Photo 24	IMG-202401301207107101316134.jpg
01/30/2024 12:07 PM (ET)	Photographer: (b) (6)
Building 1022 Valiant Medical Maintenance: Hazardous waste container for broken fluorescent lamps.	

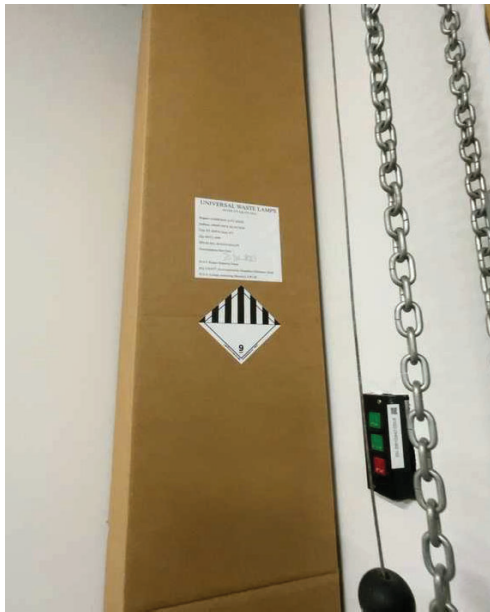


Photo 25	IMG-202401301207227221133966.jpg
01/30/2024 12:07 PM (ET)	Photographer: (b) (6)
Building 1022 Valiant Medical Maintenance: Universal waste spent fluorescent lamps.	



Photo 26	IMG-202401301207307301084210.jpg
01/30/2024 12:07 PM (ET)	Photographer: (b) (6)
Building 1022 Valiant Medical Maintenance: Universal waste spent fluorescent lamps.	



Photo 27	IMG-20240130120800801247012.jpg
01/30/2024 12:08 PM (ET)	Photographer: (b) (6)
Building 1022 Valiant Medical Maintenance: Universal waste spent fluorescent lamps.	



Photo 28	IMG-202401301214041442356281.jpg
01/30/2024 12:14 PM (ET)	Photographer: (b) (6)
Building 1006 Veterinarian Clinic: SAA for hazardous waste methanol slide stain.	

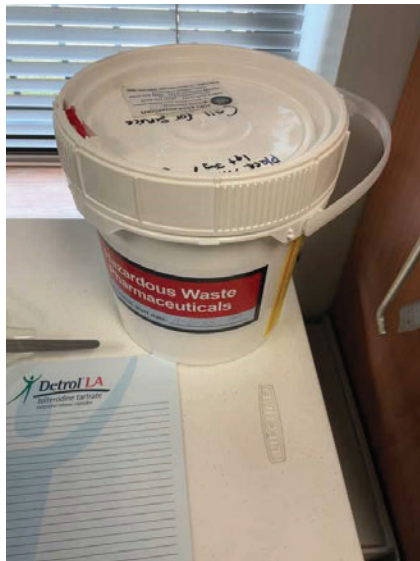


Photo 29	IMG-2024013012223022302430830.jpg
01/30/2024 12:22 PM (ET)	Photographer: (b) (6)
Building 122 Binter St. Pharmacy: SAA for hazardous waste pharmaceuticals.	

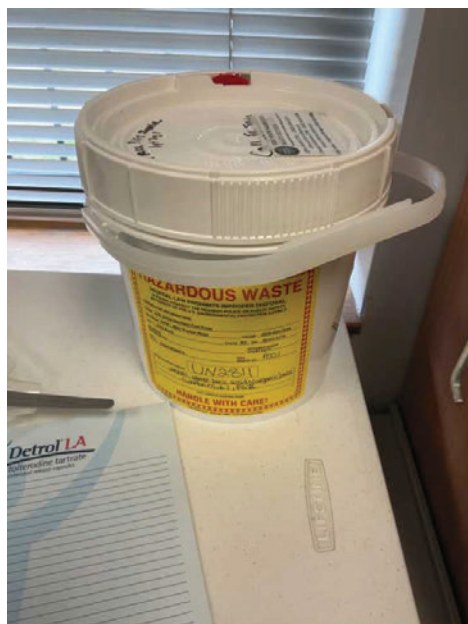


Photo 30	IMG-2024013012223622362609145.jpg
01/30/2024 12:22 PM (ET)	Photographer: (b) (6)
Building 122 Binter St. Pharmacy: SAA for hazardous waste warfarin.	



Photo 31	IMG-2024013012333133311980511.jpg
01/30/2024 12:33 PM (ET)	Photographer: (b) (6)
Building 121 Commissary – SAA for hazardous waste broken fluorescent lamps.	



Photo 32	IMG-202401301234033432142271.jpg
01/30/2024 12:34 PM (ET)	Photographer: (b) (6)
Building 121 Commissary: Universal waste spent fluorescent lamps and SAA for broken fluorescent lamps.	

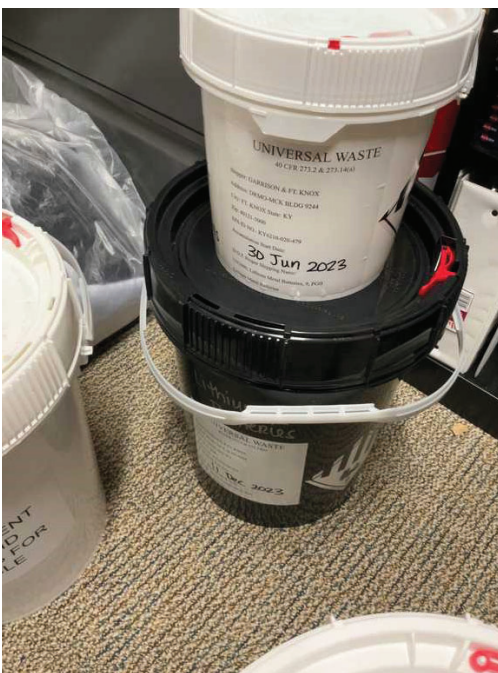


Photo 33	IMG-2024013012475147512654348.jpg
01/30/2024 12:47 PM (ET)	Photographer: (b) (6)
Building 206 Recruiting Command, Army Material, Recognition Group: Universal waste batteries.	



Photo 34	IMG-2024013012501650162338577.jpg
01/30/2024 12:50 PM (ET)	Photographer: (b) (6)
Building 206 Recruiting Command, Army Material, Recognition Group: SAA for hazardous waste paint-related material.	



Photo 35	IMG-2024013012531853182335633.jpg
01/30/2024 12:53 PM (ET)	Photographer: (b) (6)
Building 206 Recruiting Command, Army Material, Recognition Group: 5-gallon container for excluded solvent-contaminated wipes.	



Photo 36	IMG-20240130130706762484923.jpg
01/30/2024 01:07 PM (ET)	Photographer: (b) (6)
Building 7224 K-9 Unit: SAA for hazardous waste sodium chlorate and potassium chlorate.	



Photo 37	IMG-20240130140403432483806.jpg
01/30/2024 02:04 PM (ET)	Photographer: (b) (6)
Building 1327 IHG Hotel: Universal waste spent fluorescent lamps.	



Photo 38	IMG-202401301404234232304387.jpg
01/30/2024 02:04 PM (ET)	Photographer: (b) (6)
1327 IHG Hotel: SAA for hazardous waste broken fluorescent lamps.	



Photo 39	IMG-2024013014125912592517119.jpg
01/30/2024 02:12 PM (ET)	Photographer: (b) (6)
Building 5222 Godman Airfield: Universal waste batteries.	



Photo 40	IMG-2024013014371037102153782.jpg
01/30/2024 02:37 PM (ET)	Photographer: (b) (6)
Building 3075 Ammo Supply Point: SAA for hazardous waste fuse igniters.	



Photo 41	IMG-2024013014555455542316957.jpg
01/30/2024 02:55 PM (ET)	Photographer: (b) (6)
Building 2954 – Universal Waste Storage: Universal waste batteries.	



Photo 41	IMG-202401301456045642332385.jpg
01/30/2024 02:56 PM (ET)	Photographer: (b) (6)
Building 2954 Universal Waste Storage: Universal waste mercury containing equipment and SAA for hazardous waste broken fluorescent lamps.	



Photo 42	IMG-2024013014562456242265455.jpg
01/30/2024 02:56 PM (ET)	Photographer: (b) (6)
Building 2954 Universal Waste Storage: Universal waste spent fluorescent lamps.	



Photo 43	IMG-2024013110180818894455.jpg
01/31/2024 10:18 AM (ET)	Photographer: (b) (6)
Building 9826 Andrew's Shoot House: SAA for hazardous waste floor sweepings.	