UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region 1
5 Post Office Square, Suite 100
Boston, MA 02109-3912

April 6, 2023

Department of the Navy
NAVFAC MIDLNT PWD New London
Environmental Division Box 400
439 Tautog Avenue Room 104
Groton, CT 06349-5400
ATTN: Michael Brown

Re: U.S. EPA-Region 1 Inspection Report of Naval Submarine Base New London, February 22-23, 2023

Dear Mr. Brown:

In accordance with current policy, I am providing you with a copy of the final inspection report summarizing observations made during the February 22-23, 2023 Compliance Evaluation Inspection (CEI) of your facility. Please note, other than Photographs, the attachments referenced in the report are not included as they are already in your possession.

This inspection was conducted under the authority of RCRA.

Please contact me at 617-918-1678 or Carew.James@epa.gov if you have any questions.

Sincerely,

JAMES CAREW Digitally signed by JAMES CAREW
Date: 2023.04.06 15:23:16 -04'00'

James Carew, Life Scientist
EPA Inspector, Waste and Chemical Compliance Section

cc: Joseph Schiavone, CT DEEP

Disclaimer: Unless otherwise noted, this report describes conditions at the facility/property as observed by EPA inspector(s), and/or through records provided to and/or information reported to EPA inspector(s) by facility representatives and as understood by the inspector(s). This report may not capture all operations or activities ongoing at the time of the inspection. This report does not make final determinations on potential areas of concern. Nothing in this report affects EPA's authorities under federal statutes and regulations to pursue further investigation or action.

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RCRA Compliance Inspection of:

Naval Submarine Base New London
1 Crystal Lake Road
Groton, CT 06340

February 22-23, 2023
Date of Inspection

4/10/23
Date Inspection Report Approved

4/10/23
Date Inspection Report Finalized

4/11/23
Date Inspection Report Transmitted to Facility

James Carew, Life Scientist
Waste and Chemical Compliance Section

MARY ODONNELL Digitally signed by MARY ODONNELL Date: 2023.04.10 15:31:44 -04'00'

Mary Jane O'Donnell, Manager
Waste and Chemical Compliance Section

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RCRA HAZARDOUS WASTE INSPECTION REPORT

Date: **April 6, 2023**

From: **Waste and Chemical Compliance Section**

Thru: **Lisa Papetti, Senior Enforcement Coordinator**
Waste and Chemical Compliance Section

To: **RCRA Enforcement File**

Subject: Environmental Protection Agency ("EPA") Resource Conservation and Recovery Act ("RCRA") Inspection of Naval Submarine Base New London

I. GENERAL INFORMATION

Facility Name:	Naval Submarine Base New London (facility or Subase)
Facility EPA Identification Number:	CT4170022020
Type of Inspection *(CEI, FCI, CSI, etc.):*	Compliance Evaluation Inspection (CEI)
Name(s) of inspector(s):	James Carew Drew Meyer
Date(s) of inspection:	22-23 February 2023

II. SITE INFORMATION

Site Name:	Naval Submarine Base New London
Complete Street Address:	1 Crystal Lake Road, Groton, CT 06340
Complete Mailing Address:	Department of the Navy NAVFAC MIDLNT PWD New London Environmental Division Box 400 439 Tautog Avenue Room 104 Groton, CT 06349-5400 ATTN: Michael Brown

Contact(s) *(Name, Title, Phone Number, Email)*	Michael Brown, Environmental Division Director; (860) 694-3976; michael.brown13@navy.mil Brian Hendrickson, Hazardous Waste Branch Manager; 860-694-4298; brian.g.hendrickson.civ@us.navy.mil David Carter, Lead Environmental Protection Specialist; 860-694-555; David.w.carter2.civ@us.navy.mil Bernadette Reese, Senior RCRA Program Manager, NAVFAC MIDLANT EV12; 757-341-0408; bernadette.reese@navy.mil CAPT Kenneth Curtin Jr., Commanding Officer (CO)
Date of latest Notification of Hazardous Waste Activities *(per RCRAInfo)*:	24 Feb 2022
Date of first Notification of Hazardous Waste Activities *(per RCRAInfo):*	18 Aug 1980
Date established at present location:	1868
NAICS Code:	928110 - NATIONAL SECURITY 336611 - SHIP BUILDING AND REPAIRING
Current Property Owner:	US Navy
Current Operator:	US Navy
Waste codes generated *(per most recent Biennial Report)*:	**D-Codes:** D001 D002 D003 D004 D005 D006 D007 D008 D009 D010 D011 D018 D019 D021 D022 D023 D025 D026 D027 D035 D039 D040 D043 **F-Codes:** F001 F002 F003 F005 **P-Codes:** P030 P042 P081 **U-Codes:** U002 U031 U044 U072 U075 U080 **State:** CR01 CR02 CR04 CR05

NOTIFICATION IN RCRAInfo:

☒ TSDF
☒ LQG
☐ SQG
☐ VSQG
☒ Universal Waste Handler: Large Quantity Handler
☐ Burner/Blender
☐ Transporter
☐ Receiving waste from off-site (if so, describe):
☒ Generator of State Waste
☐ Non-Notifier
☐ Other:

Facility Operating Status if different from above: N/A

Enforcement History:

Date	Issuing Agency	Type	Violation(s)
28-Sep-15	State	Field Notice of Violation	Generators must determine if their solid waste is a hazardous waste
12-Mar-14	EPA	Written Informal	One year accumulation period for SQH
			HW Generators: Pre-Transport Requirements
13-Dec-10	State	Written Informal	HW generators: General
10-Mar-08	EPA	Final 3008(A) Compliance Order	HW Generators: Pre-Transport Requirements x 6
			HW generators: General x 1
			Permit Conditions x 4
13-Oct-05	State	Written Informal	HW Generators: Pre-Transport Requirements x 6
			HW generators: General x 1
			Permit Conditions x 4
			Universal Waste: General x 1
			HW TSD: Closure/Post-Closure x 1
12-Apr-94	State	Civil Judicial Action for Imminent and Substantial Endangerment	72 Violations
2-Oct-92	State	Initial Civil Judicial Action for Compliance and/or Monetary Penalty	Manifests, Recordkeeping and Reporting
			HW TSD: General x 2
			HW TSD: Closure/Post-Closure
			HW TSD: Financial Requirements
			HW TSD Contingency Plan and Emergency Procedures

III. IN-BRIEF

Credentials Presented: Yes ☒ No ☐
Attendees (*names/titles*):

EPA:
James Carew, Life Scientist
Drew Meyer, Environmental Scientist

US Navy
Brian Hendrickson, Hazardous Waste Branch Manager;
David Carter, Lead Environmental Protection Specialist

Number of Employees:	5 employees in Hazardous Waste Branch Subase personnel exceeds 9,000
Size of Facility:	687 Acres
Length of Facility at Location:	150+ years
Operating Hours:	24/7
Number of Shifts:	Hazardous Waste Branch has multiple shifts, beginning at 6am
Primary Emergency Coordinator:	Not listed in Hazardous Waste Contingency Plan
Alternate Emergency Coordinator:	Not listed in Hazardous Waste Contingency Plan
Type of Operation:	Military Installation

Facility Description *(principal business, building and property layout, history of company, etc.):*

The US Navy has continuously owned and operated what is now the Naval Submarine Base New London ("facility" or "Subase") since approximately 1868. The facility is located on the east side of the Thames River, approximately 5 miles north of Long Island Sound. Mr. Brian Hendrickson stated Subase primarily serves as a training base for future submariners. There are also several submarines and crews homeported at the facility, along with various support services for the boats and the military personnel.

As identified from the Subase website, included on the base are retail stores, office buildings, classrooms, and recreational facilities. Some military personnel reside in barracks within the footprint of the base, while other member and family housing is located outside the gated base. A publicly accessible museum operated by the US Navy is located outside of the secured facility perimeter. Medical, dental, and veterinary clinics are also operated on the base.

Many different buildings are found throughout the base, of which Mr. Hendrickson stated approximately 38 buildings are related to the Hazardous Waste (HW) program. The facility operates one Treatment, Storage and Disposal Facility (TSDF), 13 Hazardous Waste Storage Areas (HWSA) and 62 Satellite Accumulation Areas (SAA).

Process Description:

Three processes for treatment of HW are conducted at the TSDF, located in Building 562.

1. Oil Filter Crushing – Used oil filters are crushed. Liquid waste is stored in a 5-gallon container and crushed filters stored in a 55-gallon container.
2. Mercuric Nitrate Reclamation – Waste Mercuric Nitrate solution passes by tubing through 3 filters and into a 5-gallon waste container. All filters are disposed of as non-hazardous waste. The liquid waste is disposed of as state regulated waste.
3. Aerosol Can Puncturing

Types of Waste Handled:

☒ Ignitable (D001)	☒ F or K listed wastes	☒ Used Oil
☒ Corrosive (D002)	☒ P or U listed wastes	☒ State Regulated Wastes
☒ Reactive (D003)	☒ Precious Metals	☐ Unknown Wastes
☒ TCLP (D004 – D043)	☒ Hazardous Scrap Metals	
☒ Universal Wastes (Types: Batteries, Lamps, E-Waste)		
☐ Other (specify):		

Handling/Management Methods:

☒ Containers	☐ Tanks – aboveground
☐ Wastewater Treatment ("WWTU")	☐ Tanks – underground
☐ Drip pads	☐ Containment building
☒ HWSA (s)	☒ SAA(s)
☐ Other	

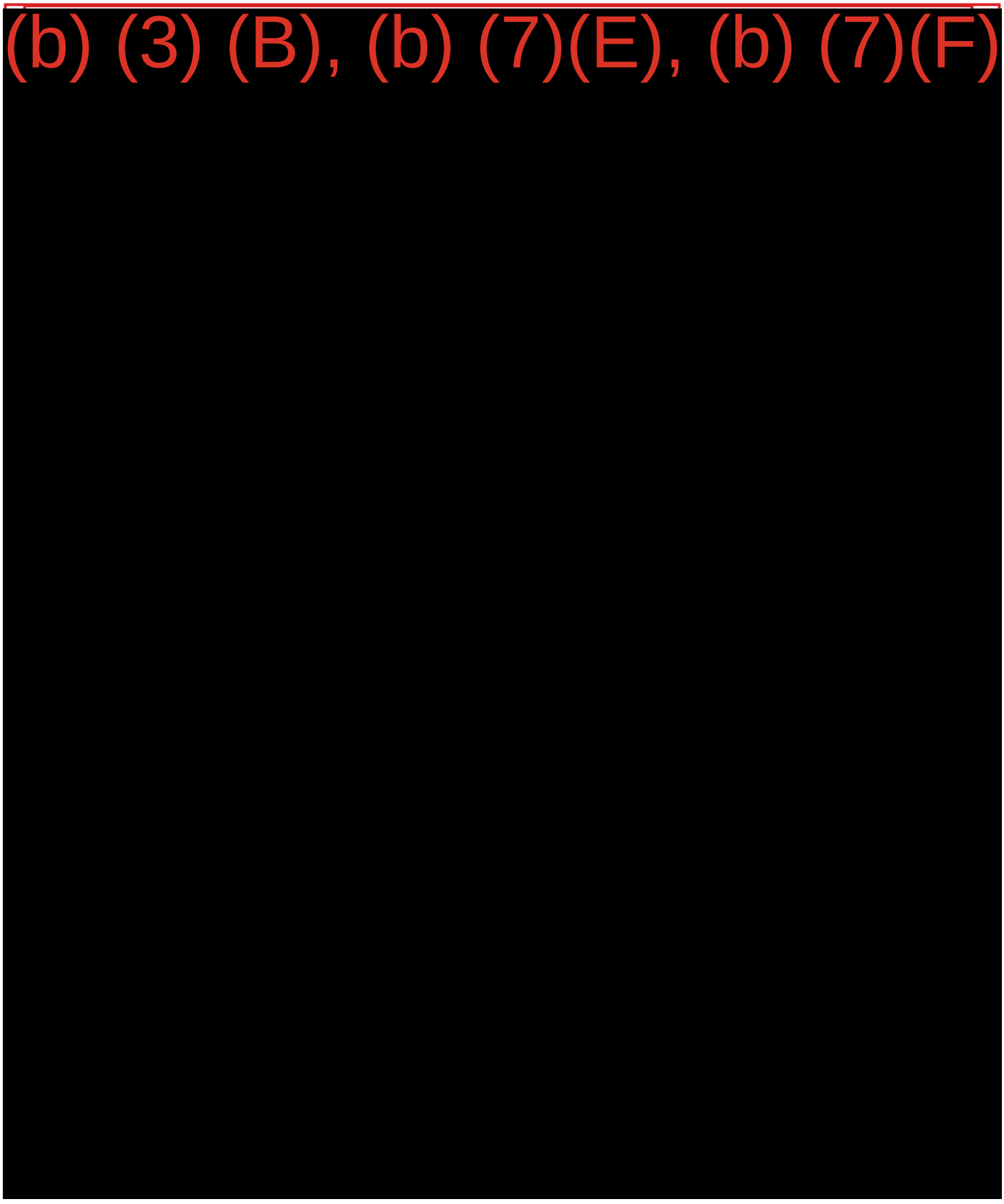
Comments:

IV. PHYSICAL INSPECTION

Areas inspected *(descriptions and locations):*
TSDF – Located at building 562. The building contained a staging area, process room, 9 bays with roll up doors and blind sumps. Each bay was designated for a particular type of waste: Acid; Reactive; Oxidizer; Ignitable; Universal; Alkaline; two Toxic; and state regulated waste. The Process/Work Room was the location in which treatment of hazardous waste occurs (oil filter crushing, mercuric nitrate reclamation, and aerosol can puncturing). Warning signs were posted throughout the TSDF and emergency pull stations were located in accessible areas. A fire

suppression system was installed, along with an emergency eye wash station. Evacuation routes were posted on the wall of the staging area. Posting with emergency contacts was not observed.

(b) (3) (B), (b) (7)(E), (b) (7)(F)



designated by the facility using a letter and number code. The 90-Day HWSAs were identified using “A”, while SAAs were identified with an “S”. Temporary HWSAs or SAAs were identified with a “T”. The facility maintains a binder in each HWSA and SAA with training certificates of the personnel responsible for management of the area, weekly inspection logs for the area, and a copy of a training presentation for use as a reference.

A17 90-Day HWSA, Clinic Pharmacy. A metal container located behind the Subase Clinic and served as the HWSA to which clinic and dental office wastes were stored. At the time of the inspection there was one container of Bulk Chemotherapy Drugs (UN 3248) in the container.

SAA S133 Medical Laboratory was located in Building 449. The SAA consisted of one small glass in secondary containment.

SAAs S109 and S110 Dental Treatment Rooms were located in Dental Clinic Building 575. The SAAs consisted of plastic containers of approximately 3-gallons in secondary containment stored under a cabinet. S109 and S110 were in separate, adjacent dental treatment rooms.

SAA S136 Dental Laboratory. Located in the Dental Clinic Building 575 on the lower floor, the SAA consisted of one 20-gallon container of isopropyl waste contaminated with resin identified as a State Regulated Waste.

A40 HWSA was located in Public Works Building 451 (“The Shops”). The HWSA contained two containers of state regulated waste oil, five containers of universal waste. Waste oil had secondary containment, spill control materials was available in the space, warning signs identifying the area as a hazardous waste area were posted.

A13 HWSA “Port Ops” was located in Building 1. The HWSA was located inside the building near the loading dock. A grated, blind sump was observed on the floor of the space. One 5-gallon container labeled as “Gasoline/Fuel Filters (Benzene, Toxic)” was observed on top of a 20-gallon container marked of state regulated waste “Used Oil (Filters) for Recycling (Hydraulic Oil/Lube Oil, Motor Oil)”, both containers were on a containment pallet. In the corner of the space was a 55-gallon container marked as “Used Oil for Recycling (Hydraulic Oil/Lube Oil, Motor Oil)” (see Photographs 20 in Attachment 2). Above the container were two sings reading “Used Oil” and “Waste Antifreeze”. Below each sign, piping and valve connected to a hose were present (see Photographs 20, 22, 25 in Attachment 2). Brian Hendrickson stated the oil and antifreeze flowed through the piping and hose, into the 55-gallon container. The Antifreeze valve appeared to be open and both bungs of the 55-gallon container were open (see Photographs 20, 22-3, 25-26 in Attachment 2). The end of the used oil hose was wrapped in oil sorbent material and lying next to the container. The end of the hose marked “Waste Antifreeze” was inserted into the larger open bung of the 55-gallon container marked as “Used Oil for Recycling (Hydraulic Oil/Lube Oil, Motor Oil)” (see Photographs 20, 22-23, 25, 26 in Attachment 2).

S127 SAA “Carpenter’s Shop” in Building 17. Enclosed by chain link fencing, the SAA contained two containers of used oil and water on secondary containment pallets.

Immediately adjacent to SAA S127 in the “Carpenter’s Shop” in Building 17 was an area identified as the Nuclear Radiological Maintenance Department (NRMD). In the NRMD area,

Inspector Meyer observed two large, plastic containers with the words “Waste Lead” on the lid, (see Photographs 27-28 in Attachment 2). Inspector Meyer asked about the box and contents, the inspection team was escorted to the NRMD area. Contractors on site stated the contents were “temporary lead shielding” that had been damaged. The contractors described the temporary lead shielding as pieces of lead, covered in a thick, plastic fabric covering. Once damaged, typically meaning the fabric has ripped, the shielding is placed in the boxes. A contractor with Electric Boat, Andrew Pigg, stated the damaged shielding was transported to a facility on the Subase, where the lead is separated from the fabric, and the lead recycled. Additionally, a rusted cylinder was observed next to the loading bay door. The cylinder was rusted, unsecured, and contained a partial US DOT Division 2.2 Non-Flammable Gas label. When asked, facility personnel stated that were not sure if the cylinder was a waste or why it was there (see Photograph 31).

TSPR “Spruce Barge” SAA was located in Building 38. Two containers of state regulated waste. Containers contain marks and labels.

A02 “R-6 Carpenter Shop” HWSA was located in Building 38. The HWSA had four 55-gallon containers of state regulated adhesives, blue, caulk waste (state waste code CR05). Accumulation start date not included on hazardous waste label on any of the four containers.

S03 “MIRCS Lab” SAA in Building 40. No waste was observed at the time of the inspection.

S42 “Inside Machine Shop” in Building 40 contained one approximately 35-gallon container of state regulated used oil on a spill pallet.

S92 “NRMD Supply” SAA in Building 88. No waste was observed at the time of the inspection.

A04 “Outside Machine Shop” near Building 88. No waste was observed at the time of the inspection.

S27 “MSRA” SAA was located in Building 153. One 5-gallon container of solder material, two 1-gallon containers of state regulated waste.

S22 “Mast/Periscope Repair” SAA was located in Building 157. Three 55-gallon containers of state regulated oily waste was observed. Containers were stored on containment pallets, all containers closed at the time of the inspection.

S77 “Vulcanizing Shop” SAA was located in Building 456. One 55-gallon container of acetone wipes with no free liquids was observed.

S47 SAA near paint booth was located in Building 456. One 55-gallon container of federally regulated, and 3 55-gallon containers of state regulated waste, all stored on spill pallets, was observed.

S120 “Rubber and Plastic” SAA was located in Building 456. Three containers of state regulated waste, stored on pill containment pallets were observed.

A19 “Electrical Division” HWSA was located outside of Building 456 in a metal storage unit. One container (plastic bag) of federally regulated marine coustifab and debris (Barium/Vinyl

Chloride) waste, one container (plastic bag) of state regulated waste paint filters, and three 55-gallon container of state regulated adhesive, glues, caulk, rubber and debris. Six lead acid batteries were in the storage unit and packaged for shipment. The label on the federal and state regulated containers identified the site as "A02" (see Photographs 32-33 in Attachment 2).

S45 "Hull Division" SAA was located in Building 478. Two 55-gallon containers of federally regulated waste, leather gloves (chromium) and adhesive debris (methyl ethyl ketone (MEK)), two 55-gallon containers of state regulated waste, used batteries were observed. All containers were marked and labeled.

A44 "Powder Coat" HWSA was located in Building 174. Three 55-gallon containers were observed, one container with federally regulated waste containing Isopropyl Alcohol/Mineral Spirits, and two 55-gallon containers of state regulated waste. All containers were marked and labeled. Warning signs were posted.

S129 "NEX Main Store" SAA was located in the warehouse of Building 484. NEX Main Store is an on base retail store facility. At the time of the inspection the SAA contained an empty plastic container, and a cylindrical cardboard container with two waste lamps. At the time of the inspection the lid of the container was not closed, and no hazardous waste labeling or marking was observed on the outside of the container (see Photograph 37 in Attachment 2). The lid was placed securely on the container prior to Photograph 37 being taken. Facility personnel closed the lid and affixed a waste label while the inspection team was on site (see Photograph 38 in Attachment 2).

S72 "NEX Gas Station" SAA was located in a metal storage unit at Building 428. The NEX Gas Station is an on base gas station and convenience store. The SAA contained one 55-gallon container of gasoline spill debris, and spill control supplies. The container was properly marked and labeled.

WASTES OBSERVED:

Not all wastes observed are noted in the table below

Waste Stream	HWD (Y/N)	EPA/State Waste Code	Location	Comments	SAA/ HWSA/ TSDF
Inorganic Acid	Y	D002	TSDF BLDG 562 - Acids Bay	Incineration hold	TSDF
Inorganic Acid	Y	D002	TSDF BLDG 562 - Acids Bay		TSDF
Reagents Silica From Pure Water Testing	Y	D002	TSDF BLDG 562 - Acids Bay		TSDF
Wastewater from Testing	Y	D002	TSDF BLDG 562 - Acids Bay		TSDF

Bulked Hydrochloric Acid	Y	D002	TSDF BLDG 562 - Acids Bay		TSDF
Lamps	Y	UW	TSDF BLDG 562 - Acids Bay	26 boxes	TSDF

(b) (3) (B), (b) (7)(E), (b) (7)(F)

Hydrazine Solution 22% (Reactive)	Y	D003, U133	TSDF BLDG 562 - Reactives Bay	Flammable Locker	TSDF
Waste Containing Nitro (Reactive)	Y	D003, P081	TSDF BLDG 562 - Reactives Bay	Flammable Locker	TSDF
Lithium Batteries	Y	UW	TSDF BLDG 562 - Reactives Bay	Flammable Locker	TSDF
Flammable Waste Liquid (Alcohols)	Y	D001	TSDF BLDG 562 - Flammables Bay	1 of 16 drums on 4 pallets, no spacing between pallets or wall	TSDF
Flammable Waste Liquid	Y	D001	TSDF BLDG 562 - Flammables Bay	1 of 16 drums on 4 pallets, no spacing between pallets or wall. Incineration hold.	TSDF
Flammable Waste Paint liquid with Isocyanates	Y	D001	TSDF BLDG 562 - Flammables Bay		TSDF
Flammable Waste, Liquid (Alcohol)	Y	D001	TSDF BLDG 562 - Flammables Bay		TSDF

Flammable Liquid Waste Paint Liquid	Y	D001	TSDF BLDG 562 - Flammables Bay		TSDF
Bulked D001 Medical & Dental Waste (Flammable)	Y	D001	A-17 BLDG B-449		HWSA
Spent Slide Stainer from Manual Process (Flammable/Methanol)	Y	D001, F003	S-133 Medical Laboratory		SAA
Dental Amalgam for Recycling (Mercury) Toxic	Y	D009	S-109 & S110 Dental Treatment Rooms		SAA
Used Oil (Filters) for Recycling (Hydraulic Oil / Lube Oil / Motor Oil)	Y	CR02	A-13 Port Services (Port Ops)	State Regulated Waste	HWSA
Gasoline / Fuel Filters (Benzene) Toxic	Y	D018	A-13 Port Services (Port Ops)		SAA
Marine Coustifab & Debris (Barium / Vinyl Chloride) Toxic	Y	D005, D043	A-02 R-6 Carpenter Shop		HWSA
Mil Oil-2431A Formula 184 Type 1 TPA (Flammable)	Y	D001	TSPR Spruce Barge		SAA
Soldering Material (Lead & Silver) Toxic	Y	D008, D016	S-27 BLDG 153		SAA
Plug Shooting Debris (Acetone)	Y	F003	S-77 BLDG 456		SAA
Paint & Thinner Debris (Flammable, In-Butyl Alcohol)	Y	D001, F003	S-47 BLDG 456		SAA
Waste Adhesive Debris	Y	CR05	S-120 BLDG 456		SAA

Adhesive & Debris (MEK)	Y	D035	S-45 BLDG 478		SAA
Leather Gloves (EB Workers) (Chromium) Toxic	Y	D007	S-45 BLDG 478		SAA
Isopropyl Alcohol / Mineral Spirits	Y	D001	A-44 BLDG 174		HWSA
Lamps	Y	UW	S-129 NEX Main Store BLDG 484	Box open, no label, two lamps inside. Fixed while on site.	SAA
Gasoline Spill Debris (Benzene) Toxic	Y	D018	S-72 NEX Gas Station BLDG 428		SAA
High Pressure Cylinder	N		S-127 Temp Boat Services BLDG 17	Rusted cylinder stored near loading bay door, partial DOT 2.2 Non-Flammable gas label	Not in TSDF, HWSA or SAA

HAZARDOUS WASTE DETERMINATIONS

Requirements	**Observations** ***(Yes/NO/NA-Explain if needed)***
Determination conducted for all waste streams, by what method	Yes. Generator knowledge and laboratory analysis.
Determination updated, as needed (documentation on-site)	Yes.
Comments:	

IGNITABLES/REACTIVES/INCOMPATIBLES

Requirements	**Observations** ***(Yes/No/NA-Explain if Needed)***
Ignitable & reactive wastes separated from sources of ignition or reaction	Yes
No smoking signs (for ignitable & reactive wastes)	Yes
Separation of all incompatibles (either incompatible wastes or wastes with incompatible containers)	Yes
Storage > 50 feet from property line	Yes

Comments:	

PREPAREDNESS & PREVENTION

Requirements:	**Observations** ***(Yes/No/NA-Explain if Needed)***
Wastes handled in a manner to minimize the potential for a fire, explosion or a release	Yes
Arrangements with local authorities	Yes
Immediate accessible to internal communications/alarm systems	Yes
Telephone/hand-held two-way radio	Yes
Emergency equipment (fire extinguishers, spill control decontamination equipment)	Yes
Equipment maintenance	Yes
Access to emergency equipment	Yes
Adequate aisle space (each area)	No. In the flammables bay of the TSDF, 16 steel 55-gallon containers on four pallets, and four cubic-yard containers were stored with no spacing between pallets. Two 330-gallon and one 275-gallon container were stored in the "Reactives" bay with no spacing between containers.
Adequate source of water in the event of a fire (federal regulations)	Yes
Comments:	

PRE-TRANSPORT REQUIREMENTS

Requirements:	**Observations** ***(Yes/No/NA-Explain if Needed)***
Packaging	Yes
Labeling (if applicable, DOT hazard class)	Yes
Marking (words "Hazardous Waste", generator information if being shipped)	Yes
Contents described	Yes
Proper DOT shipping name	Yes
Comments:	

SATELLITE ACCUMULATION

Requirements:	**Observations** ***(Yes/No/NA-Explain if Needed)***
Approximate number of satellite accumulation areas	62
Appropriate amount of waste storage in SAA	Yes
Containers labeled and marked with contents described	No. UW lamp container in NEX Main Store SAA S-129 in BLDG 484 contained two lamps. Container was not labeled. See Photographs 37 & 38 in Attachment 2
SAA at or near point of generation	Yes
Containers closed when not actively adding or removing waste	No. UW lamp container in NEX Main Store SAA S-129 in BLDG 484 contained two lamps. Container was open. See Photographs 37 & 38 in Attachment 2
Condition of containers	Yes
Impermeable base	Yes
Secondary Containment	Yes
Spill Control material	Yes
Comments:	

CONTAINER STORAGE – HWSA

Requirements:	**Observations** ***(Yes/No/NA-Explain if Needed)***
Number of container storage areas	Yes
Location(s)	Yes
Containers marked and contents described	Yes
Containers marked with accumulation start date	Yes
Approximate number & sizes of containers: Description:	Yes
Floor drains/sumps	Yes. Blind sumps/drains.
Containers closed when not actively adding or removing waste	Yes.
Condition of containers (leaks, ruptures, dents, corrosion, heat, pressure)	Yes
Impermeable base	Yes
Secondary Containment	Yes
Incompatibles separated by e.g., dike/wall	Yes
Storage less than 90 days or 180 days for SQG (hazardous waste)	Yes
Spill Control material	Yes
Comments:	Container marked as “Used Oil”, a state regulated waste, in A-13 HWSA in Port Services BLDG 1 had a hose in one of the

	two open bung holes. The hose was connected to the wall, below a sign reading "Waste Antifreeze". The valve at the wall hose connection appeared to be open. The end of the hose was in was container labeled as a State-Regulated Waste, waste code CR02. CR02 is defined as "oil or petroleum waste" in the facility's state issued RCRA Part B Renewal Permit (Permit). Antifreeze is listed as CR04 in the Permit. See Photographs 20, 22-23, 25, 26 in Attachment 2

WASTE TANKS

No hazardous waste tanks were on site at the time of the inspection.

HAZARDOUS WASTE MANAGEMENT IN OTHER TYPE(S) OF UNITS

No other types of units were on site at the time of the inspection.

USED OIL

Requirements:	**Observations** ***(Yes/No/NA-Explain if Needed)***
Does the facility generate used oil	Yes
Is the generator's used oil mixed with other waste(s)	N/A
What type of waste(s) is used oil mixed with ☐ Listed ☐ Characteristic ☐ Non-hazardous waste	N/A
If mixture is with characteristic hazardous waste, is the combined waste tested for characteristics	N/A
Testing for rebuttable presumption	N/A
Total halogen content determination	N/A
Total halogen content determined by ☐ testing or ☐ generator knowledge	N/A
Are the total halogens ☐ less than 1,000 ppm or ☐ greater than 1,000 ppm	N/A
F-listed halogen constituents above 100 ppm	N/A
Used oil managed according to applicable standards	N/A
Is used oil accumulated on-site in:	

☒ Container(s) ☐ Aboveground tank(s) ☐ Underground tank(s)	
Describe type, method and condition	Steel drums in good condition
Comments:	

INSPECTION SCHEDULE AND LOG

Requirements:	**Observations** ***(Yes/No/NA-Explain if Needed)***
Does the facility claim inspections are conducted (tank and/or container inspections)	Yes
Written inspection schedule	Yes
Inspection log (adequacy of contents: date, time, items inspected, corrective actions, identity of inspector, signatures, etc.)	Yes
Documentation	Yes
Appropriate tank inspections, including containment, level detection, ancillary equipment	N/A
Appropriate treatment equipment inspections	Yes
All loading/unloading areas subject to spills (when in use)	Yes
All hazardous waste storage areas (satellite and < 90 day where applicable), at all required frequencies	Yes
All Safety and emergency equipment (monthly) where necessary	Yes
Tanks cathodic protection (within six months, then yearly) where necessary	N/A
Comments:	Inspection logs maintained at each TSDF, HWSA, and SAA in a binder.

CONTINGENCY PLAN

Requirements:	**Observations** ***(Yes/No/NA-Explain if Needed)***
Plan on-site	Yes
Date of plan	February 2019
Emergency Coordinator(s) name, address, home and office phone numbers	No. Contingency plan states in section 3.0: "A list of all persons qualified to act as Emergency Coordinator is not provided because such a list would change too frequently to be useful. Instead, Emergency

	Coordinators will be contacted through the SUBASENLON Regional Dispatch Center by telephone at (860) 694-3333." See Appendix M-1 Hazardous Waste Contingency Plan, (Section 3.0 plan) of the state issued RCRA Part B Renewal Permit.
Number to call to report emergency (internal)	Yes
Plan to local authorities with proof of distribution (police, fire, hospital, emergency response teams)	No. No evidence contingency plan was delivered to local authorities was available.
Emergency procedures (fire, explosions, releases/spills)	Yes
Emergency coordinator(s) on-site or within a short driving distance of the company at all times	Yes
Emergency equipment list location, description, capabilities	Yes
Evacuation plan (signal, primary and alternate routes)	Yes
Has the contingency plan been amended	No. Issued Feb 2019 as part of state issued permit. No edits noted since issue date.
All remaining applicable requirements addressed	Yes
Comments:	

PERSONNEL TRAINING RECORDS

Requirements:	**Observations** ***(Yes/No/NA-Explain if Needed)***
All facility personnel that require training identified	Yes
All facility personnel that require training have been properly trained	Yes
New employees trained within 6 months and documentation of OST	Yes
Annual refresher training for all employees requiring training	Yes
Last annual training date for each employee	Yes
Written description of training course	Yes
Adequate training for all employees	Yes
Job title, job description, name of employee, and description of required training	Yes
Job duties related to hazardous waste	Yes
Records maintained on-site until closure or	Yes

three years for former employees	
Comments:	

AIR EMISSIONS - SUBPART BB

Not applicable

AIR EMISSIONS - SUBPART CC

Not applicable

Tanks:

Not applicable

MANIFESTS

Requirements:	**Observations** ***(Yes/No/NA-Explain if Needed)***
Dates/months of shipping records reviewed	Even months for Jan 2020- Dec 2022
Manifests maintained for three years	Yes
Correct EPA ID numbers used	Yes
All required parts completed	Yes
Correct shipping names, numbers used	Yes
Copies distributed correctly	Yes
Exception reports filed, and available for review	Yes
Manifests used for all hazardous waste shipments	Yes
Appropriate copy(ies) on-site:	Yes
Comments:	

DATE	MANIFEST #	WASTE CODES	QUANTITY FED _KG	QUANTITY NONFED _KG
1/23/2020	000007507TAG	D002	24.49	0
1/23/2020	000007508TAG	D002, D005, D006, D007, D008	14.97	0
1/29/2020	014293910FLE	D001, D002, D005, D006, D007, D008, D009, D018, D035, F002, F003, F005, P042, P075, CR02, CR04, CR05	1,899.32	2,679.37
1/29/2020	014293913FLE	CR04, CR05	0	9,145.13

2/18/2020	014293917FLE	D001, D002, D003, D005, D006, D007, D008, D011, D035, CR02, CR04	678.91	4,472.11
3/25/2020	000007512TAG	D008, D009	0.45	0
4/28/2020	014293958FLE	D001, D002, D005, D006, D007, D008, D009, D010, D011, D018, F002, F003, F005, P081, U002, U154, CR02, CR04, CR05	2,063.95	1,172.34
6/30/2020	014293983FLE	D008	284.81	0
6/30/2020	014293986FLE	D001, D002, D003, D005, D006, D007, D008, D011, D035, F003, F005, P001, P075	1,658.05	10,337.87
7/7/2020	014303352FLE	D008	1,814.06	0
9/1/2020	014176726FLE	D001, CR05	45.35	0
9/2/2020	000007515TAG	D002, D008	37.19	0
9/9/2020	014294033FLE	D001, D002, D005, D006, D007, D008, D009, D010, D011, D035, F003, F005, CR02, CR04, CR05	1,632.65	3,843.09
10/14/2020	000007521TAG	D005, D006, D007, D008, CR01	5	0
10/27/2020	014294066FLE	D001, D002, D005, D006, D007, D008, D009, D010, D011, D018, F002, F003, F005	2,826.31	0
10/28/2020	014294068FLE	D003	0.91	0
11/12/2020	000007523TAG	D005, D006, D007, D008	59.41	0
12/3/2020	019769755JJK	D007	19,047.63	0
12/9/2020	014294097FLE	D001, CR02, CR04	456.69	1,030.39
12/9/2020	014294099FLE	D003, D022, P042, U044, U133	18.59	0
12/14/2020	000007524TAG	D005, D006, D007, D008, CR01	24.34	0
12/30/2020	001949300VES	CR04, MA99	0	907.03
1/22/2021	014294112FLE	D001, D002, D011, CR04	26.76	0
1/22/2021	014294113FLE	D001, D002, D005, D008, D009, D018, F002, F003, F005, P001, P075, CR02, CR04, CR05	2,335.15	6,119.09
1/27/2021	000007526TAG	D008	0.91	0
1/28/2021	001949450VES	CR04, MA99	0	907.03
2/25/2021	000007532TAG	D005, D006, D007, D008	4.99	0
3/16/2021	014294137FLE	D008, U188, CR02, CR04, CR05	87.07	11,895.84
3/16/2021	014294138FLE	D001, D002, D004, D005, D007, D008, D009, D010, D011, D018, D035, U002, CR02, CR04	1,280.27	852.61
3/18/2021	001931342VES	CR04, MA99	0	263.04
5/3/2021	014294166FLE	D008	10,366.9	0
5/20/2021	015442733FLE	D005, D006, D007, D008, D009	15.87	0

5/21/2021	014294172FLE	D001, D002, D003, D008, D009, D011, D018, D021, D035, D039, F002, F003, F005, P081, U019, U154, CR02	1,683.9	951.93
6/22/2021	015306809FLE	CR04, R015	0	416.07
7/7/2021	014294217FLE	D008, CR02, CR04, CR05	67.12	3,260.12
7/7/2021	014294218FLE	D009	4.54	0
7/14/2021	014294219FLE	D005, D006, D007, D008, OUTS409H	9	0
7/21/2021	015442786FLE	D005, D006, D007, D008	33.56	0
7/26/2021	014294221FLE	D001, D002, D005, D006, D007, D008, D010, D011, D018, F003, F005, CR04, CR05	961.45	2,863.04
8/19/2021	015679013FLE	D008	181.41	0
8/31/2021	014294241FLE	D001, D005, D006, D007, D008, D009, D011, CR02, CR04, CR05	112.93	8,443.61
9/15/2021	015442783FLE	D005, D006, D007, D008	21.77	0
10/1/2021	014294254FLE	D008	7,619.05	0
10/13/2021	014294256FLE	D001, D008, F002, F003, F005, CR02, CR04, CR05	220.86	5,703.67
11/9/2021	014294269FLE	D001, D002, D005, D006, D007, D008, D009, D010, D011, D018, F002, F003, F005, CR02, CR04, CR05	1,722	7,005.52
11/9/2021	014294270FLE	D005, D006, D007, D008, OUTS409H	32	0
12/1/2021	015442778FLE	D002	21.32	0
1/4/2022	014294286FLE	D002, D007, D008, D010	57.6	5,714.81
1/19/2022	015442776FLE	D005, D006, D007, D008	11.34	0
2/23/2022	014294303FLE	D008	1,282.54	0
2/23/2022	014294304FLE	D001, D002, D008, D009, D018, CR02, CR04, CR05	295.24	5,202.27
3/21/2022	016480751FLE	CR05, VT21, VT22, VT99	0	434.79
4/8/2022	017949494JJK	CR04, R015	0	136.05
4/8/2022	017949495JJK	CR04, R015	0	136.05
4/20/2022	015442765FLE	D002, D007	8.16	0
4/26/2022	024210506JJK	D001, D002, D007, D010, D011, P042, U002, U154	80.73	0
4/26/2022	024210509JJK	D001, D002, D007, D010, D011	66.21	0
4/26/2022	024210510JJK	D001, D003, D011, U133, U154, U220	45.35	0
4/26/2022	024210515JJK	U210, OUTS001H	3.63	0

4/26/2022	024210507JJK	D001, D002, D005, D007, D011, D035, D039, F003	2,360.09	0
4/26/2022	024210513JJK	D001, D002, D003, D005	1,018.14	277.55
4/26/2022	024210514JJK	D001, D005, D007, D008, D011, D035, D043, F003, F005	2,753.29	0
4/26/2022	024210508JJK	D001, D002, D005, D008, D011, D035, P001, P075	1,118.37	0
5/12/2022	024210519JJK	F002	5.9	0
5/12/2022	024210520JJK	D002, D009, D011	4.54	0
5/12/2022	024210522JJK	D001, D002, D009	10.88	1,217.69
5/12/2022	024210523JJK	CR02, CR04, CR05	0	3,647.43
5/12/2022	024210521JJK	D001, D009, D010, D011, D024, P081, CR04	8.62	11.79
5/26/2022	024210541JJK	D001, D002, D003, D006, D009	2.72	0
5/26/2022	016188239FLE	CR05, R015	0	544.22
6/1/2022	015442762FLE	D005, D006, D007, D008	19.5	0
6/14/2022	023099348JJK	CR02, MA98	0	18,912.22
7/27/2022	015442759FLE	D002, D005, D006, D007, D008	15.42	0
9/2/2022	024210615JJK	D002, P001, P075	3.63	0
9/20/2022	024210618JJK	D001, D005, D006, D007, D008, D009, D010, D011, CR04	761.91	10,242.18
9/20/2022	024210619JJK	D001, D002, D011, D018, D035, F003, F005	1,542.86	434.47
9/21/2022	015442738FLE	CR01	0	3.17
9/21/2022	015442741FLE	D002, D005, D006, D007, D008, CR01	14.06	0
9/23/2022	017941158FLE	D008	1,687.08	0
10/18/2022	016595408FLE	D006	43.08	0
11/4/2022	024210648JJK	D001, D006, D007, D009, D011, D035, D039, F003, F005, CR04	1,135.6	3,568.26
11/21/2022	017769102FLE	D008	73.02	0
12/6/2022	015442742FLE	D007	0.45	0
12/7/2022	024210687JJK	D001, F003, F005, CR05	306.58	19.05
12/7/2022	024210688JJK	D018, CR04, CR05	512.93	802.72
12/19/2022	016593854FLE	D008	6,820.87	0

LAND DISPOSAL RESTRICTIONS

Requirements:	**Observations** ***(Yes/No/NA-Explain if Needed)***
Generator has determined whether the waste meets treatment standard(s)	Yes

If the waste or contaminated soil **does not meet** the treatment standard(s), the generator has sent a one-time written notification (or subsequent notification(s) if the waste changes) to each receiving facility ***or*** the generator has sent individual notification(s) for each shipment of waste	Yes
If the waste or contaminated soil **meets** the treatment standard(s) at the original point of generation, the generator has sent a one-time written notification (or subsequent notification(s) if the waste changes) to each receiving facility	Yes
The generator has identified all appropriate waste codes and/or underlying hazardous constituents (UHCs) on each shipment	Yes
The generator retained on-site a copy of each LDR documentation for 3 years	Yes
Comments:	

IMPORT/EXPORT ACTIVITIES

Not applicable

ANNUAL/BIENNIAL REPORT

Requirements:	**Observations** ***(Yes/No/NA-Explain if Needed)***
The company has completed an annual or biennial report, when/if it is required	Yes
Comments:	

UNIVERSAL WASTE

Requirements:	**Observations** ***(Yes/No/NA-Explain if Needed)***
Does the company/facility handle universal wastes	Yes
What universal wastes are handled/generated by the facility	Lamps, Batteries, E-waste
Does the company/facility qualify as an LQH or SQH of universal waste	LQH as listed in Biennial Report
Does the current handling of universal waste prevent breakage, leakage, spillage or damage that could cause leakage	Yes

Are the containers of universal waste structurally sound and compatible with the contents	Yes
Do the universal waste containers carry appropriate markings/labeling	No. Lamp container in NEX Main Exchange SAA S-129 in BLDG 484 contained two lamps and was not marked at the time of the inspection. Fixed while inspection team was on site.
Does universal waste meet the requirements for accumulation start date	Yes
Does the generator comply with the less than one year accumulation time limit	Yes
Is the universal waste item or container dated from the earliest receipt of the item or when first placed in the container	No. Lamp container in NEX Main Exchange SAA S-129 in BLDG 484 contained two lamps and was not dated at the time of the inspection. Fixed while inspection team was on site.
Does the company/facility keep appropriate manifests or shipping documents of universal wastes either received at or shipped from the facility to a destination facility	Yes
Are records kept for at least three years from date of receipt to or transfer from the facility	Yes
Comments:	

OUT-BRIEF

List Attendees *(names/titles):*

EPA Region 1:
James Carew, Life Scientist, RCRA Inspector

US Navy:
Brian Hendrickson, Hazardous Waste Branch Manager
David Carter, Lead Environmental Protection Specialist
Michael Brown, Environmental Director
Bernadette Reese, Senior RCRA Program Manager, NAVFAC MIDLANT EV12

Summary of outbrief:
A virtual out-brief was held on March 13, 2023 using the Microsoft Teams platform with attendees from EPA Region 1 and the US Navy. During the out-brief, Inspector Carew provided a brief summary of the inspection conducted February 22-23, 2023 and the following topics were discussed:

1. Open/unlabeled lamp container at the NEX Main Store SAA
2. Cylinder in NRMD building.
3. Spacing of containers in Acid and Ignitable bays in Building 562.

4. Waste Antifreeze hose in a container labeled as state regulated “Used Oil for Recycling” in in Port Services Building 1.
5. Fabric for Lead Shielding in NRMD building.
6. Emergency Coordinators in Hazardous Waste Contingency Plan.
7. Distribution of the Hazardous Waste Contingency Plan.

Outbrief notes:

- Mr. Michael Brown stated the cylinder was determined to be in use (not a waste) and has been removed from the location at which it was stored at the time of the inspection.
- Mr. Hendrickson stated the fabric and shielding are transported off site intact for recycling.
- Mr. Hendrickson stated a new contract was established by DLA that will allow for the transport and disposal of many of the containers currently on “incineration hold”. The waste is expected to be picked up and transported within the next few weeks.

List of Attachments:

ATTACHMENT #1: CT DEEP Issued Storage Extension for the Temporary Backlog of Containerized Hazardous Waste Needing Incineration Naval Submarine Base New London (SUBASE)
ATTACHMENT #2: Digital Images taken by EPA Region 1 during the inspection
ATTACHMENT #3: Subase HWSA & SAA List
ATTACHMENT #4: Subase TSDF Inventory
ATTACHMENT #5 CT DEEP Issued RCRA Part B Renewal Permit
ATTACHMENT #6: Waste Profiles