RCRA Inspection Report

1) Inspector and Author of Report

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Enforcement and Compliance Assurance Division
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2) Facility Information

Marine Corps Air Station Beaufort (MCASB)
Highway 21
Beaufort, South Carolina 29904
Beaufort County

3) Responsible Officials

Christopher Vaigneur
Natural Resources Environmental
Affairs Officer
christopher.vaigneur@usmc.mil

4) Inspection Participants

Corey Jackson	MCASB
Christopher Vaigneur	MCASB
Evan Eggleston	MCASB
Gerald Shealy	SC DHEC Columbia
Daryl R. Himes	US EPA Region 4 Atlanta

5) Date of Inspection

November 29, 2022 at 9:25 a.m. EDT

6) Applicable Regulations[1]

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; South Carolina Hazardous Waste Management Act, S.C. Code Ann. § 44-56-10 *et seq*., and South Carolina Hazardous Waste Management Regulations (SCHWMR), S.C. Code Ann. Regs. 61-79.260-270, 61-79.273 and 61-79.279; and Hazardous Waste Permit SC1750216169.

[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 S.C. Code Ann. Regs. 61-79.262.15(a) [40 C.F.R. § 262.15(a)], a generator may accumulate as much as 55 gallons of non-acute hazardous waste in containers at or near any point of generation where wastes initially accumulate, which is under the control of the operator of the process generating the waste, without a permit or without having interim status, as required by Section 44-56-60(a)(2) and (b) of the SCHWMA, S.C. Code Ann. § 44-56-60(a)(2) and (b) [Section 3005 of RCRA, 42 U.S.C. § 6925], and without complying with S.C. Code Ann. Regs. 61-79.262.16(b)(2) or [40 C.F.R. § 262.16(b) or § 262.17(a)], except as required in S.C. Code Ann. Regs. 61-79.262.15(a)(7) and (8) [40 C.F.R. § 262.15(a)(7) and (8)], provided that the generator complies with the satellite accumulation area conditions listed in S.C. Code Ann. Regs. 61-79.262.15(a) [40 C.F.R. § 262.15(a)] (hereinafter referred to as the "SAA Permit Exemption").

7) Purpose of Inspection

The purpose of this inspection was to conduct an unannounced compliance evaluation inspection to determine MCASB's compliance with the conditions of its RCRA Hazardous Waste Facility Operating Permit SC1750216169, the applicable requirements of RCRA and the corresponding SC DHEC regulations. This was an EPA lead inspection.

8) Facility Description

The Marine Corps Air Station Beaufort (MCASB) in Beaufort, South Carolina is home of the Marine Corps' Atlantic Coast fixed-wing, fighter-attack aircraft assets. This installation houses six Marine Corps F/A-18 squadrons and one F-35B Fleet Replacement Squadron. Three versions of the F/A-18 Hornet are located at MCASB, the F/A-18A and C Hornet and the F/A-18D Hornet. The F-35B squadron is also the only location in the world where pilots train to fly the F-35B. The squadron also trains the United Kingdom's future F-35B pilots and maintainers.

MCASB is located on 7,000 acres and operates 24 hours and seven days a week. There are 759 Marines and Sailors along with 660 civilian personnel who ensure approximately 3,400 personnel of Marine Air Group 31 and its component squadrons and tenant units are readily deployable.

MCASB's most recent Hazardous Waste Generator Notification (EPA Form 8700-12) dated January 1, 2016, characterized the facility as a treatment, storage and disposal facility (TSDF), a large quantity generator (LQG) of hazardous waste and a small quantity handler of universal waste (SQHUW). Currently, MCASB 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-D011, D018, D035, D039, D040, F002, F003, F005, U117, U151, and U161.

9) Previous Inspection History

This facility was last inspected on March 24, 2022, by SC DHEC. No issues were found during the inspection.

10) Opening Conference

On November 29, 2022, EPA inspector Daryl Himes, accompanied by SC DHEC inspector Gerald Shealy, arrived at MCASB at approximately 9:25 a.m. Christopher Vaigneur, the facility's Natural Resources/Environmental Affairs Officer, immediately received the inspectors outside of the facility's main security gate. The inspectors presented their credentials and were escorted onto the base through the main gate. The inspectors were joined by Corey Jackson and Evan Eggleston of the facility's environmental office for an informal opening conference in which the inspectors introduced themselves, explained the purpose of the visit and stated their desire to see all active generation and storage locations of hazardous waste.

The inspectors described the anticipated use of digital cameras during the inspection and provided a request for records. No discussion was held with the facility about being a small business as it is a U.S. military base. A brief statement was given to facility personnel to inform the inspectors if any information provided is confidential business information.

The facility representatives stated that, for the most part, operations at the facility remained the same as those observed in previous inspections.

11) Inspection Observations

Unless noted otherwise, all containers of hazardous waste observed within a satellite accumulation area (SAA) were closed, labeled with the words "Hazardous Waste," and marked with an indication of the hazard associated with the waste contained.

Branch Health and Dental Clinic

The inspectors observed one small package of non-hazardous epi-pens in the pharmacy. Within Room 6, two 5-gallon containers of D009/D011 hazardous waste were observed within a SAA containing hazardous waste amalgams collected from traps and filters in the dental clinic.

Corrosion Control Facility

The Corrosion Control Facility consisted of three service bays used for painting, sanding, stripping and sandblasting operations performed on F-18s.

Service Bay #1 is a paint rework booth. At the time of the inspection hazardous waste was observed within SAAs which included one 55-gallon container of D005/D006/D007/D008/ F003/F005 hazardous paint waste, one 5-gallon container of D007 hazardous absorbent rags and one 15-gallon container of D001/D035 (ignitable/MEK) characteristic hazardous waste adhesives were observed.

Service Bay # 2 is a part of a sandblast, plane stripping and sand rework area. At the time of the inspection, five SAAs of hazardous waste were observed. The five areas included the following:

- 55-gallon container of D006/D007/D008 hazardous paint waste with blast media

- 30-gallon container of D005/D006/D007/D008/F003/F005 hazardous waste sanding disks
- 15-gallon container of D001/D005/D006/D007/D008 hazardous waste paint thinner
- 15-gallon container of D006/D007 hazardous waste debris with plating solution
- 15-gallon container of D006/D007 hazardous waste plating solution

In addition, one 15-gallon container of used oil was also observed. The container was labeled with the words "Used Oil."

Service Bay # 3 is a painting area. At the time of the inspection one 55-gallon drum of D005/D006/D007/D008/F003/F005 hazardous waste rags and paint debris was observed.

VMFAT – 501 Area – Building 3090

The Marine Fighter Attack Training Squadron 501 (VMFAT-501) is a training squadron consisting of 20 F-35B Lightning II aircraft which are replacing the F-18 aircraft. This building was newly constructed at the time of this inspection.

Within Room 119 of this Building, the inspectors observed one 55-gallon container within a SAA of hazardous waste rags, sanding discs and debris.

Within the hanger area of this building, which included eight aircraft maintenance bays, one 15-gallon container of hazardous waste absorbent contaminated with solvent was observed in a SAA. The container was not labeled with an indication of the hazard contents of the container (Photographs 1 and 2).

Pursuant to S.C. Code Ann. Regs. 61-79.262.15(a)(5)(ii) [40 C.F.R. § 262.15(a)(5)(ii)], which is a condition of the SAA Permit Exemption, a generator is required to mark or label its containers with an indication of the hazards of the contents.

Hanger 414

This building contained 10 to 12 maintenance bays capable of performing work on F-18 military aircraft.

Inside the hanger, one 30-gallon container of D001/D035 characteristic hazardous waste adhesive material and one 6.5-gallon container of D005/D006/D007/D008/F003/F005 characteristic and listed hazardous waste rags and sanding disks were observed within a SAA.

On the flight line for this building, the inspection team observed a 300-gallon container used for the collection of used oil (Photograph 3). The container was not labeled with words "Used Oil" at the time of the inspection.

Pursuant to S.C. Code Ann. Regs. 61-107.279.22(c)(1) [40 C.F.R. § 279.22(c)(1)], containers and aboveground tanks used to store used oil at generator facilities must be labeled or marked clearly with the words "Used Oil."

In addition, oil collection pans (Photograph 4) were observed beneath F-18s both on the flight line and within Hanger 414. The pans, some which contained used oil, were not labeled with the words "Used Oil."

Pursuant to S.C. Code Ann. Regs. 61-107.279.22(c)(1) [40 C.F.R. § 279.22(c)(1)], containers and aboveground tanks used to store used oil at generator facilities must be labeled or marked clearly with the words "Used Oil."

Building 1051/1081

These buildings are used to perform aircraft equipment maintenance operations.

Building 1051 was designated for corrosion control operations including painting and bead blast operations. Inside this building, one 15-gallon container of F003/F005 listed paint waste was observed in a SAA. Outside of the building, one 55-gallon container of hazardous waste D006//D007/D008 spent bead blast material was observed to be connected to a baghouse which was further connected to a bead blast machine which is operated inside of the building. A small 5-feet by 5-feet plastic shed was also observed immediately outside of the building which contained one 55-gallon hazardous waste container of D005/D006/D007/D008/F003/F005 hazardous waste made up of sanding discs and debris within a SAA.

Building 1081 was designated for mechanical operations. Inside the building, one 55-gallon container of used oil, labeled as "Used Oil," was observed.

Auto Hobby Shop

The Auto Hobby Shop is open to the station personnel to rent recreational equipment and space to work on personnel equipment. At the time of the inspection, this area was closed and not accessible because it is operated by personnel not associated with the Facility.

Building 1205 Universal and Non-Regulated Waste Storage

The Natural Resources and Environmental Affairs Office (NREAO) located in Building 1205 housed the offices of the NREAO team, the universal waste storage area and the non-regulated RCRA waste. The inspectors observed the following in this building:

- Sixty-three boxes of universal waste fluorescent lamps marked with universal waste language and an accumulation start date of less than one year.

- Two 55-gallon, one 15-gallon and three 30-gallon containers of universal waste batteries marked with universal waste language and accumulation start dates of less than one year.

- One 55-gallon hazardous waste container in a SAA for the collection of D001/D005/D007/ D008 characteristic and F003/F005 listed hazardous waste resulting from the puncturing of aerosol wastes.

- Unregulated batteries designated for a reuse program and other nonregulated materials were also observed in this area.

Permitted Hazardous Waste Storage Facility

The permitted hazardous waste storage facility (HWSA) was located in Building 1030. The inspectors observed the HWSA was enclosed by a fence with the proper signage on the gate. Inside the structure was a concrete floor with a built-in sump, drain and six bays. The waste streams were divided by the bays. All containers were labeled with the words "Hazardous Waste" and were marked with storage start dates of less than one year. An emergency eyewash and shower were in this structure as well as a spill kit. All containers in this area were observed closed, labeled and marked with accumulation start dates of less than one year.

Building 594 -F-18 Maintenance Hanger

The building is used to perform maintenance operations on F-18s. The inspectors observed the following hazardous wastes within SAAs:

- One 30-gallon container of D001/D006/D007/D035/D040 characteristic hazardous waste adhesive debris.

- One 15-gallon hazardous waste sanding debris.

- One 6.5-gallon container of D002/D007 characteristic hazardous Alodine waste.

- One 6.5-gallon container of D006/D007/D008 characteristic hazardous blast media waste.

- Four 55-gallon containers of used oil labeled with the words "Used Oil" were observed in the hanger area of this building.

Building 1260 – Consolidate Armory

Small arms used by base personnel are maintained and cleaned in an area just outside of this building on metal tables. Three 30-gallon Safety-Kleen machines are used in this area for parts cleaning purposes. The solvent currently used by the machines, containing petroleum distillates, has a flash point of 148 degrees Fahrenheit according to the safety data sheet for the solvent and is not managed as a hazardous waste. Facility personnel in this area stated that no other spray solvents are used for weapon cleaning purposes in this area.

Explosive Ordinance Disposal Range

This area makes up the facility's permitted Subpart X treatment area. It consists of a sand pit with approximated dimensions of 60-feet by 60-feet which is surrounded by an earthen berm. Munitions were said to be detonated in this area about twice each month. This area was active at the time of the inspection and could not be inspected at this time. No hazardous wastes were observed in this area at the time of EPA's 2018 CEI.

Inspection Records

After the walkthrough, the inspectors requested and reviewed the facility's applicable training records, contingency plan, inspection records and manifests.

Closing Conference

The inspection team conducted an exit meeting at the end of the walk-through inspection and review of the facility's hazardous waste records with facility personnel which included Christopher Vaigneur, Corey Jackson and Evan Eggleston. During this meeting, the inspectors discussed their preliminary findings made during the inspection.

12) Signed

DARYL HIMES Digitally signed by DARYL HIMES Date: 2022.12.09 13:14:25 -05'00'

Daryl R. Himes
Environmental Engineer

Date

13) Concurrence

ARACELI CHAVEZ Digitally signed by ARACELI CHAVEZ Date: 2022.12.13 13:07:41 -05'00'

Araceli B. Chavez
Chief
RCRA Enforcement Section

Date

ATTACHMENT A

Marine Corps Air Station Beaufort

Beaufort, South Carolina

COMPLIANCE EVALUATION INSPECTION

SC1750216169

November 29, 2022

Photos taken by Daryl R. Himes
Photos taken with Canon Power Shot Elph 360 HS

Photo 1 – Label on Container in VMFAT – 501 Area – Building 3090 without hazard indicator

Photo 2 – Container in VMFAT – 501 Area – Building 3090 without hazard indicator

Photo 3 – Used Oil Container on flight line outside Hanger 414

Photo 4 – Examples of used oil collection pans used by MCASB