

RCRA Inspection Report

1) Inspector and Author of Report

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2) Facility Information

Eglin Air Force Base
501 DeLeon St, Suite 100 (Bldg. 696)
Eglin Air Force Base, Florida 32542

EPA ID Number: FL8570024366

Operating Action Permit 0006176-005-HO

NAICS: 928110 - National Security

3) Responsible Official

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4) Inspection Participants

Kevin Doyle	EAB
Eric Sculthorpe	EAB
Kenneth Powell	EAB
Monica Hardin	FDEP Northwest District
Kayla Acosta	US EPA Region 4
Héctor M. Danois	US EPA Region 4

5) Date and Time of Inspection

February 25-26, 2021 @ 8:30 A.M.

6) Applicable Regulations

Subtitle C of the Resource Conservation and Recovery Act (RCRA) (42 U.S.C. §§ 6921 – 6939g), the Chapter 403 of the Florida Statutes (Fla. Stat.), Fla. Stat. §§ 403.702 et seq.; 40 Code of Federal Regulation (C.F.R.), Parts 260 - 270, 273 & 279, and Rule 62-730 et seq. of the Fla. Admin. Code Ann.

Chapter 403 of the Florida Statutes, Fla. Stat. § 403.702 et seq., and rules 62.710.210 -.901, and 62-730 et seq. of the Florida Administrative Code Annotated (Fla. Admin. Code Ann.).

As the State's authorized hazardous waste program operates in lieu of the federal RCRA program, the citations of those authorized provisions alleged herein will be to the authorized State program; however, for ease of reference, the federal citations will follow in brackets.

Pursuant to Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.17], an LQG may accumulate hazardous waste on-site for 90 days or less without a permit or without having interim status, as required by Section 403.722 of the Florida Statutes, Fla. Stat. § 403.722 [Section 3005 of RCRA, 42 U.S.C. § 6925], provided that the generator complies with the conditions listed in Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.17] (hereinafter referred to as the "LQG Permit Exemption").

Pursuant to Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.15(a)], a generator may accumulate as much as 55 gallons of non-acute hazardous waste in containers at or near the point of generation where wastes initially accumulate, which is under the control of the operator of the process generating the waste, without a permit or without having interim status, as required by Section 403.722 of the Florida Statutes, Fla. Stat. § 403.722 [Section 3005 of RCRA, 42 U.S.C. § 6925], and without complying with Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.16(b) or §262.17(a)], except as required in Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.15(a)(7) and (8)], provided that the generator complies with the satellite accumulation area conditions listed in Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.15(a)] (hereinafter referred to as the "SAA Permit Exemption").

Pursuant to Fla. Admin. Code Ann. r. 62-730.185(1) [40 C.F.R. § 273.9], a "Small Quantity Handler of Universal Waste" (SQHUW) is a Universal Waste handler who does not accumulate 5,000 kilograms or more of Universal Waste (batteries, pesticides, mercury-containing equipment, or lamps, calculated collectively) at any time.

7) Purpose of Inspection

The purpose of the inspection was to conduct a RCRA compliance evaluation inspection (CEI) to determine the compliance of Eglin Air Force Base with the applicable regulations.

8) Previous Inspection History

On September 23, 2020, FDEP conducted a RCRA CEI at the facility and no RCRA deficiencies were discovered.

9) Facility Description

Eglin Air Force Base (hereafter known as EAB or “the facility”) is a 724-square mile military base spanning three counties, Okaloosa, Walton, and Santa Rosa, in northwest Florida founded in 1935. EAB conducts research, development, and testing of air armament. EAB is divided into three areas: Reservation, Main Base, and Duke Field.

EAB’s most recent Hazardous Waste Generator Notification (EPA Form 8700-12) dated March 27, 2020, characterized the facility as a large quantity generator (LQG) of hazardous; the facility is currently undergoing the permit renewal process.

Currently, EAB can generate hazardous waste streams, and universal wastes (such as spent batteries, certain types of lamps, and mercury-containing devices or equipment), waste solvent, spent aerosol cans, paint waste and other wastes which include EPA Waste Codes D001, D002, D003, D004, D005, D006, D007, D008, D009, D010, D011, D018, D022, D035, D038, D039, D040, F001, F002, F003, F004, F005, U041, U044, U080, U112, U122, U133, U134, U159, U211, U220, U223, and U279.

10) Opening Conference

☒ Credentials Presented	☒ CBI warning to facility provided
☐ SBREFA fact sheet, if applicable	☐ CBI was provided or discussed during the inspection
☒ Health and Safety, Personal Protective Equipment discussion	☐ Additional equipment that will be used, if applicable (FLIR camera, PID, FID)

On February 25-26, 2021, the U.S. Environmental Protection Agency, Region 4 inspectors, Héctor M. Danois and Kayla Acosta, accompanied by FDEP inspector Ms. Monica Hardin, arrived at EAB to inspect the facility to determine its compliance status with both RCRA and the State of Florida hazardous waste regulations.

EAB was represented by Mr. Sculthorpe and Mr. Doyle. Upon entering the facility, the inspectors introduced themselves, showed their credentials, and explained the purpose of the visit, and a description of the facility’s process was discussed.

11) Findings

A brief explanation for the inspection was given, as well as an introduction of the FDEP and EPA inspectors. The inspectors requested a description of the facility operations. The inspectors then performed a walk-through inspection of specific areas in the facility. Below is a description of the observations made during the inspection.

Building #552-Used Oil Storage

The inspection team spoke to Mr. Mark Taylor and Mr. Mitchell Crum, Area Supervisors. A chain-link fenced area with a concrete slab and a small building manages the used oil and used oil filters

generated throughout the Main Base. The storage has limited access and specific operating hours in which personnel can drop off their used oil and used oil filters. Used oil is put away in one of three underground storage tanks (one 10,000-gallon and two 5,000-gallon). The larger tank is primarily used for everyday operations. At the time of inspection, the area had a small dumpster-style container labeled for used oil filters and a large container for antifreeze consolidation, stored near the center of the concrete pad. Drained used oil filters are recycled. Empty oil drums are triple rinsed, and the oily water is sent to the oil/water separator. A secondary containment pit and grate ran the length of the yard. Released oil and rainwater are pumped to the oil/water separator. All containers were labeled, and the area was free of spills.

Building #524- Central Accumulation Area (CAA)

The inspection team spoke to Mr. Mike Gonzales, Hazardous Waste Area Supervisor. The 90-day storage is located on Eglin's Main Base within a gated shipping/receiving and storage lot area. The area consists of two connected warehouses with flammable wastes and non-hazardous wastes in the northern garage; corrosive and universal wastes in the southern garage; and in-process containers, an aerosol can puncture unit and a lamp crushing unit at the entrance of the building. EAB uses a lamp crushing unit for damaged lamps; all other universal waste lamps are stored and shipped in carbon-fiber or compatible containers.

On the flammable side of the building, the inspection team found approximately 27, 55-gallon containers, two 5-gallon containers, and three 15-gallon containers of flammable waste. The drums were closed, labeled, and dated (oldest 1/20/21). On the toxic side of the building, the inspection team found approximately 47, 55-gallon containers, five 1-gallon containers, three 15-gallon containers, and three 5-gallon containers of toxic waste. The drums were closed, labeled, and dated (oldest 1/12/21).

The inspection team noticed some containers of PCB waste stored in the CAA. The containers were also labeled hazardous waste and dated. Mr. Doyle informed the team that the containers were mislabeled and were not RCRA hazardous waste. The labels were fixed by end of the inspection.

Also, the warehouses stored universal waste generated around the facility. At the time of the inspection, the area was storing:

- Two 35-gallon containers of Li-Ion batteries
- Three 5-gallon containers of Ni Metal batteries
- 15-gallon container of Li batteries
- 10-gallon container of Ni-Metal batteries
- 5-gallon container of lead-acid batteries
- 5-gallon container of Hg Devices
- 5-gallon of Metal Halide lamps
- 10-gallon container of low-pressure sodium lamps
- 35-gallon container of lamps
- 30-gallon container of lamps

All containers were closed labeled, and dated (oldest 8/20/20)

Building #500 - 96L Vehicle Maintenance

The inspection team spoke to Mr. Lowry Bridges, Area Manager of the 96L Vehicle Maintenance. Technicians conduct routine maintenance and minor repairs on a fleet of approximately 12,000 vehicles. The inspectors noted the floor appeared sealed, and spill kits, shower/eyewash station, and fire extinguishers appeared readily available. At the time of the inspection, the area was storing, a 55-gallon container of absorbent rags (non-hazardous), a 55-gallon container of spill pads, a 55-gallon container of used filters, two 30-gallon fluid evacuator container used to vacuum used oil, a 380-gallon used oil tank and two 55-gallon containers of spent Dex-Cool antifreeze. Acid-lead batteries are recycled.

Outside the building, the inspection team found an aerosol can puncturing unit attached to a 35-gallon container, a 30-gallon container for gas filters, two empty 35-gallon containers of empty aerosol cans. All containers appeared closed and labeled.

Building #455-96 Corrosion Control

The inspection team spoke to Mr. Eric Sturges, Area Manager of the 96 Corrosion Control Building. In this shop, technicians conduct preventive maintenance and repairs of air-ground equipment. Technicians perform paint stripping using pressurized water. The used water goes to a filtration process to remove any paint residue or sludge. The sludge is collected in 55-gallon containers and disposed of as hazardous waste. At the time of the inspection, the area was storing a 55-gallon SAA container of hazardous waste sludge. The containers were closed and labeled.

Operators paint some of the equipment in a 50-feet long paint booth. Filters are removed every couple of years depending on their use. Also, the area was storing a 55-gallon SAA container of hazardous waste sludge. The containers were closed and labeled.

Painters clean their paint guns at the paint kitchen. At the time of the inspection, the area was storing a 55-gallon SAA container of paint hazardous waste, a 5-gallon SAA container of hazardous waste sandpaper, a 55-gallon SAA container of hazardous waste rags, and a 5-gallon container of non-hazardous waste gun cleaner. All containers were closed and labeled.

Open Detonation (OD) Site Range C-62

Eglin has an operating/corrective action permit (#0006176-HO-008) for two regulated/operating units (Ranges C-62 and C-52) and corrective action requirements for multiple solid waste management units (SWMUs) and areas of concern (AOCs). The facility is currently working with the Department to renew the permit. At the time of inspection, EAB was conducting OD operations, and the inspection team was not able to perform a site visit.

Building #72 -Aircraft Corrosion Control

The inspection team spoke to Mr. Dan Stornick, Area Manager of the Aircraft Corrosion Control. Building 72 houses the 96 MXS Corrosion Control that performs painting operations for the aircraft (F15/F16) maintenance inside a large hangar. At the time of the inspection, the inspection team found the area storing a 55-gallon SAA container of pad/rags with paint strip, a 55-gallon SAA

container of MEK contaminated rags, a 55-gallon SAA container of waste paper, and a 30-gallon SAA container of Alodine/tips. All containers were closed and labeled.

In one end of the hangar, operators from Tyndall Air Force Base (temporarily working at EAB) conduct maintenance in their aircraft. At the time of the inspection, the area was storing a 55-gallon SAA container of paint debris, a 55-gallon SAA container of waste adhesive, a 55-gallon SAA container of waste debris, a 55-gallon SAA container of paint-related material, and a 55-gallon SAA container of paint waste. The inspection team noticed paint drips and residue on the open-top funnel and container storing paint waste (See Figure 1). The container was changed at the end of the inspection. All containers were closed and labeled.

Pursuant to Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.34(a)(4)], which incorporates Fla. Admin. Code Ann. r. 62-730.180(2) [40 C.F.R. § 265.31], and is a condition of the LQG Permit Exemption, a generator is required to maintain and operate its facility to minimize the possibility of a fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water which could threaten human health or the environment.

The building has a small paint booth to paint aircraft parts. At the time of the inspection, the area was storing a 55-gallon SAA container of paint waste fluid, a 55-gallon SAA container of paper dust chips, and a 55-gallon SAA container of contaminated rags with MEK. Also, the area had a small paint kitchen to conduct paint mixtures and clean the paint guns. At the time, the area was storing a 55-gallon SAA container of paint waste. All containers were closed and labeled.

Across the paint booth, the facility had two blasting booths using a plastic abrasive to remove the paint. The spent blast media is collected in a 55-gallon SAA container. All containers were closed and labeled.

Universal Waste Storage (Outside the hospital)

The inspection team spoke to Mr. Brian Long and Mr. Sean O'Loughlin. UW generated at the hospital is stored in a large metal container. The container sits outside the loading area of the hospital. At the time of the inspection, the area was storing three cardboard containers storing UW lamps. The containers were closed, labeled, and dated (oldest 2/2/21).

High Explosive Research and Development (HERD)

The inspection team spoke to Sgt. Rickard and Sgt. Swinney, Storage Area Managers. The HERD is the only Air Force facility that develops explosives. The restricted area has a less than 90-day HWSA in Buildings 1198 and 1199 Weapons Area. At the time of the inspection, the Building 1199 HWSA bunker was empty and used as a backup storage area. The main bunker Building 1198 contained one 55-gallon drum of waste explosive, blasting type D, EPA Waste Code D003. The drum was closed, labeled, and dated.

Duke Field 919th SOW

The 919th Special Operations Wing (SOW), located at Eglin AFB Field 3, Duke Field, is the only special operations wing in the Air Force Reserve. The 919th SOW is a subordinate unit of the 10th

Air Force headquartered at Naval Air Station Fort Worth Joint Reserve Base, Texas, and the Air Force Reserve Command, with headquarters at Robins Air Force Base, Georgia. In wartime or a contingency, the wing reports to Air Force Special Operations Command at Hurlburt Field, Florida. Duke Field is located 12 miles from the main base.

Duke Field Building 3117 Corrosion Building

The inspection team spoke to Mr. Jonathan Speer, Ms. Randi Hurt, and Mr. Kyle Linsenbee, Hazardous Waste Area Managers. Technicians at Building 3117 perform maintenance at aircraft and air-ground equipment by conducting sheet metal work, paint stripping, and painting, welding among other things. At the time of the inspection, the area was storing, a 55-gallon SAA container of contaminated rags/paper, a 55-gallon SAA container of paint waste/MEK, a 35-gallon SAA container of waste adhesive/compound, and a 30-gallon SAA container of paint waste. In a separate area, technicians have two blasting boxes to paint strip aluminum and metal parts using plastic media. At the time of the inspection, the area was storing two 55-gallon SAA containers of spent blast media. All containers were closed and labeled.

Duke Field Building 315 Consolidated Tool Kit Building

The inspection team spoke to Sgt. Portnoy, Attendant. This is the area where technicians can check out tools and equipment. Sgt. Portnoy is also in charge of managing the used oil collection area. The inspectors observed a fenced in and covered area storing a 55-gallon used oil drum on a secondary containment pallet, a red bench with wire mesh inside for draining used oil filters and capturing the oil into a 5-gallon container below, a 10-gallon container of non-hazardous grease, and a 30-gallon fluid evacuator container used to vacuum and store used oil (not labeled). The container was labeled by the end of the inspection.

Pursuant to Fla. Admin. Code Ann. r. 62-710.210(2) [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.”

7th Special Forces Group (Airborne) Gun Range

The inspection team spoke to Mr. Bill Sarnoski, Gun Range Manager. The 7th Special Forces Group (Airborne) is located 22 miles from the main base. The purpose of this group is to prepare forces for deployment to conduct worldwide special operations, across the range of military operations. The inspectors toured the gun range. Mr. Sarnoski explained that the gun range has 14 lanes used by the military for target practice. The debris is collected in a chamber in the back of the gun range and remove using a screw auger system. At the time of the inspection, a 55-gallon SAA container of lead bullet debris was located outside. The container was closed and labeled.

Recordkeeping

The following documents were reviewed on site: biannual annual report (2019), HSWA and SAA weekly inspections (2019-2021), contingency plan (2/2021), quick reference guide (QRG) and arrangement with local authorities, employee training (2020-2021), pollution prevention and waste minimization plans, job descriptions and 2019-2020 hazardous, non-hazardous, and the universal waste manifests (2020-2021).

12) Closing Conference

The RCRA inspectors completed their inspection on February 26, 2021. EAB was inspected as an LQG. At the time of the inspection, the facility was operating as an LQG. On April 8, 2021, an out-briefing on the findings of the inspection was provided by Mr. Danois and Ms. Hardin to Mr. Doyle and Mr. Sculthorpe.

13) Signed

**HECTOR
DANOIS** Digitally signed by
HECTOR DANOIS
Date: 2021.04.16
06:39:53 -04'00'

Héctor M. Danois
Inspector and Author of Report

Date

14) Concurrence and Approval

**ARACELI
CHAVEZ** Digitally signed by
ARACELI CHAVEZ
Date: 2021.04.16
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Araceli B. Chavez
Chief
RCRA Enforcement Section

Date

Photo Log Summary

Photos taken on February 25-26, 2021

Kayla Acosta

Camera: Samsung WB250F

EPA Property Tag: S75914



Figure 1 - 55-gallon SAA container storing paint waste