

Hazardous Waste Section  
File Room Document Transmittal Sheet

17

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4  
ATLANTA FEDERAL CENTER  
61 FORSYTH STREET  
ATLANTA, GEORGIA 30303-8960

JUL 16 2014

Julie Woolsey, Chief  
Hazardous Waste Section  
North Carolina Department of Environment and Natural Resources  
1646 Mail Service Center  
Raleigh, North Carolina 27699-1646

SUBJ: RCRA Compliance Evaluation Inspection  
Military Ocean Terminal Sunny Point  
EPA ID. No.: NC6 971 590 009

Dear Ms. Woolsey:

On June 4, 2014, a compliance evaluation inspection (CEI) was conducted by the U.S. Environmental Protection Agency and the State of North Carolina Department of Environment and Natural Resources- Division of Waste Management (NCDENR) at the Military Ocean Terminal Sunny Point in Southport, North Carolina, to determine the facility's compliance status with the Resource Conservation and Recovery Act (RCRA). This RCRA CEI was an EPA lead inspection.

Enclosed is the EPA RCRA Site Inspection Report which indicates that deficiencies of RCRA were discovered. If you have any questions regarding this matter, please contact John C. Goodwin, of my staff, by phone at (404) 562-8488 or by email at [goodwin.john@epa.gov](mailto:goodwin.john@epa.gov).

Sincerely,

Nancy McKee, Chief  
North Enforcement and Compliance Section  
RCRA and OPA Enforcement and  
Compliance Branch  
RCRA Division

Enclosure

cc: Bobby Nelms, NCDENR





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JUL 10 2014

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Linda Rogers  
Environmental Compliance Manager  
Military Ocean Terminal Sunny Point  
6280 Sunny Point Road  
Southport, North Carolina 28461-7800

SUBJ: RCRA Compliance Evaluation Inspection  
Military Ocean Terminal Sunny Point  
EPA ID. No.: NC6 971 590 009

Dear Ms. Rogers:

On June 4, 2014, a Compliance Evaluation Inspection (CEI) was conducted by the U.S. Environmental Protection Agency and the State of North Carolina Department of Environment and Natural Resources-Division of Waste Management (NCDENR) at Military Ocean Terminal Sunny Point in Southport, North Carolina, to determine the facility's compliance status with the Resource Conservation and Recovery Act (RCRA). This RCRA CEI was an EPA lead inspection.

Enclosed is the EPA RCRA Site Inspection Report which indicates that deficiencies of RCRA regulations were discovered. A copy of this report has also been forwarded to NCDENR.

If you have any questions regarding this matter, please contact John C. Goodwin, of my staff, by phone at (404) 562-8488 or by email at [goodwin.john@epa.gov](mailto:goodwin.john@epa.gov).

Sincerely,

Nancy McKee  
Chief, North Enforcement and Compliance Section  
RCRA and OPA Enforcement  
and Compliance Branch  
RCRA Division

Enclosure



7) Purpose of Inspection

The purpose of the inspection was to conduct an unannounced U.S. Environmental Protection Agency Compliance Evaluation Inspection aboard the Military Ocean Terminal, Sunny Point (hereinafter, referred to as Sunny Point, or the “facility”) and determine the facility’s compliance status with the Resource Conservation and Recovery Act (RCRA).

8) Facility Description

The Military Ocean Terminal, Sunny Point, is a U.S. Army installation established in 1955. The facility has three wharves along the Cape Fear River used to accomplish the primary mission of the facility, which is to plan, coordinate, and accomplish the movement of ammunition through the terminal. Approximately 85% of all military munitions leaving the United States are shipped thorough this facility.

The facility consists of 8,500 acres within the fenced boundary and a total of 16,000 acres including the blast area. The site employs 285 civilian employees and three military personnel. Water has been supplied by Brunswick County since 1988 and all sewage is discharged through septic systems. There are two potable wells on site as well as monitoring wells. The closest offsite well and residence is at Orton Plantation which is located approximately 1 ½ - 2 miles away from the office area.

The facility is registered as a conditionally exempt small quantity generator (CESQG) of hazardous waste as of December 2012. The majority of the wastes generated are from maintenance and administration buildings. Any munitions that may not be in proper condition for use are shipped back to the site of origination for their determination on whether the materials are waste or eligible for reconditioning.

9) Inspection Findings

On June 4, 2014, John C. Goodwin with the EPA, along with Bobby Nelms with NCDENR, arrived at the facility. At approximately 10:30 a.m., the inspectors introduced themselves, showed their credentials and explained the purpose of the visit. An out-briefing was conducted at the end of the inspection to summarize the findings. The following areas were inspected:

*Building 6*

Vehicle maintenance is performed in Building 6. One of the four parts-washers utilized onsite is located in this building. The parts washer solvent is serviced by Safety-Kleen and has a flash point of 150°F. The solvent is cycled out every 8 weeks. A used oil tank is located outside the building. The 495 gallon tank was properly marked as “used oil.”

*Building 31*

Boat Maintenance is performed in this building. One 5-gallon bucket containing less than a gallon of used oil was observed unmarked.

**According to 40 C.F.R. § 279.22(c), adopted by reference at 15A NCAC 13A.0118, requires that containers and aboveground tanks used to store used oil, fill pipes used to transfer used oil at generator facilities must be labeled or marked clearly with the words “Used Oil.”**

*Building 9*

Building 9 is the forklift maintenance and storage area. New and used batteries are stored in this area along with any aerosols. Two of the batteries were dated with an installation date of 12-15-11. The batteries were not marked as waste batteries.

**The facility failed to meet the requirements in 40 C.F.R. § 273.14(a), adopted by reference at 15A NCAC 13A.0119. This regulation requires that universal waste batteries or a container or tank in which such batteries are contained, must be labeled or marked clearly with any one of the following phrases: “Universal Waste-Battery(ies)” or “Waste Battery(ies)”, or “Used Battery(ies).”**

*Building 7*

Vehicle maintenance is performed in building 7. No apparent RCRA deficiencies were noted.

*Building 43*

The “Rail Shop” is located in Building 43. This area services the rail trains that move the cargo on and off the site. Used oil filters were being collected in a marked 250 gallon container. Another parts washer was observed in this area. No apparent RCRA deficiencies were noted in this area.

*Building 437*

Building 437, the “Environmental Shed,” is where the facility stores any hazardous waste and environmental supplies. No waste was observed in storage at the time of the inspection. No apparent RCRA deficiencies were noted.

*Building 30*

One box of waste lamps was observed properly marked but was not closed. There was no date on the container but the last shipment had occurred in December, 2013. It was recommended that the facility track the start accumulation date by marking the containers of waste lamps.

**The facility failed to follow the requirements in 40 C.F.R. § 273.13(d)(1), adopted by reference at 15A NCAC 13A.0119. This regulation requires that a small quantity handler of universal waste must contain any lamp in containers or packages that are structurally sound, adequate to prevent breakage, and compatible with the contents of the lamps. Such containers and packages must remain closed and must lack evidence of leakage, spillage or damage that could cause leakage under reasonably foreseeable conditions.**

*Munitions Storage Area*

A drive thru inspection was conducted of the site's munition storage areas and the loading/unloading bays. The shipments are inventoried upon arrival to be placed in designated storage areas that are separated by earthen blast berms.

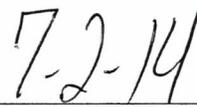
*Records Review*

The inspectors requested the SPCC plan and the manifests for hazardous waste, used oil, and universal waste lamps for review. No apparent RCRA deficiencies were noted.

10) Signed

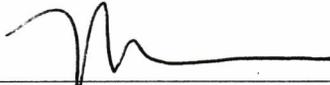


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John C. Goodwin, Environmental Engineer  
North Enforcement and Compliance Section  
RCRA Division

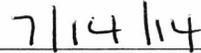


\_\_\_\_\_  
Date

Concurrence



\_\_\_\_\_  
Nancy McKee  
Chief, North Enforcement and Compliance Section  
RCRA Division



\_\_\_\_\_  
Date