

Hazardous Waste Section
File Room Document Transmittal Sheet

Your Name: Jenny Patterson
EPA ID: N C 8 2 1 0 0 2 0 1 2 1
Facility Name: FORT BRAGG HQ, GARRISON CMD XVIII ABN CORPS
Document Group: Inspection/Investigation (I)
Document Type: Compliance Evaluation Inspection (CEI)
Description: Copy of EPA Inspection Report for June 11, 2013 CEI. Letter on report is dated April 1, 2014.
Date of Doc: 6/11/2013
Author of Doc: Tony Jenkins

File Room Use Only

NC8210020121

Date Recieved by File Room:

Month	Day	Year

Scanner's Initials:

Date Scanned:



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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



APR 01 2014

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Shawn Hardee
Hazardous Program Manager
U.S. Army Fort Bragg XVIII Airborne Corps
AFZA-PW-EE Building 3-2238
Fort Bragg, North Carolina 28310-5000

SUBJ: Resource Conservation and Recovery Act (RCRA) Compliance Evaluation Inspection (CEI)
U.S. Army Fort Bragg XVIII Airborne Corps, NCD 210 020 121

Dear Mr. Hardee:

On June 11, 2013, the U.S. Environmental Protection Agency, along with North Carolina Department of Environment and Natural Resources (NCDENR), conducted a RCRA Compliance Evaluation Inspection at U.S. Army Fort Bragg XVIII Airborne Corps in Fort Bragg, North Carolina, to determine the facility's compliance status with RCRA and applicable state regulations.

Enclosed is the EPA RCRA CEI report. A copy of this report has been forwarded to NCDENR. If you have any questions regarding this matter, please contact Tony Jenkins, of my staff, by phone at (404) 562-8603 or by email at jenkins.anthony@epa.gov.

Sincerely,

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

Enclosure

cc: Ms. Jenny Patterson, NCDENR
Mr. Bobby Nelms, NCDENR



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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

APR 31 2014

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

SUBJ: Resource Conservation and Recovery Act (RCRA) Compliance Evaluation Inspection (CEI)
U.S. Army Fort Bragg XVIII Airborne Corps, NCD 210 020 121

Dear Ms. Woosley:

On June 11, 2013, the U.S. Environmental Protection Agency, along with North Carolina Department of Environment and Natural Resources, conducted a RCRA Compliance Evaluation Inspection at U.S. Army Fort Bragg XVIII Airborne Corps in Fort Bragg, North Carolina, to determine the facility's compliance status with RCRA and applicable state regulations.

Enclosed is the EPA RCRA CEI report, which indicates that the facility was found to be out-of-compliance with RCRA. Based on the RCRA Enforcement Response Policy, this facility has been determined by the EPA to be a Secondary Violator.

If you have any questions regarding this matter, please contact Tony Jenkins, of my staff, by phone at (404) 562-8603 or by email at jenkins.anthony@epa.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Nancy McKee".

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

Enclosure

RCRA COMPLIANCE EVALUATION INSPECTION REPORT

1) Inspector and Author of Report

Tony D. Jenkins,
Environmental Engineer RCRA and OPA Enforcement and Compliance Branch, RCRA Division
U.S. Environmental Protection Agency (EPA)
61 Forsyth Street
Atlanta, Georgia 30303
Office: (404) 562-8603

2) Facility Information

U.S. Army Fort Bragg XVIII Airborne Corps AFZA-PW-EE Building 3-2238
Fort Bragg, North Carolina 28310-5000

EPA ID: NC8 210 020 121

3) Responsible Official

Shawn Hardee, Hazardous Program Manager
U.S. Army Fort Bragg XVIII Airborne Corps

4) Inspection Participants

Tony Jenkins, EPA
Bobby Nelms, Waste Management Specialist, North Carolina Department of Environment and
Natural Resources (NCDENR)
Audrey Oxendine, U.S. Army Fort Bragg XVIII Airborne Corps
Shawn Hardee, U.S. Army Fort Bragg XVIII Airborne Corps
Mike Bullard, U.S. Army Fort Bragg XVIII Airborne Corps

5) Date of Inspection

June 11, 2013

6) Applicable Regulations

40 Code of Federal Regulation (C.F.R.), Parts 260 - 270, 273 and 279, Resource Conservation and Recovery Act (RCRA) Sections 3005 and 3007, (42 US Code - Annotated U.S.C.A. 6925 and 6927), and Title 15A, Chapter 13, North Carolina Administrative Code (NCAC).

7) Purpose of Inspection

The purpose of this inspection was to conduct an unannounced compliance evaluation inspection (CEI) to determine U.S. Army Fort Bragg XVIII Airborne Corps's (Fort Bragg) compliance with

the applicable requirements of RCRA and the corresponding NCDENR regulations. Fort Bragg is registered as a large quantity generator (LQG) of hazardous waste.

8) Facility Description

Fort Bragg has been operating in their current location since 1918. The facility is located on approximately 130,000 acres of land, and employs 2,000 - 5,000 civilian personnel and 45,000 soldiers. Fort Bragg owns and operates its waste water treatment plant, provides potable water, and cogenerates the facility's power.

Fort Bragg contracts out a majority of support activities that occur on base, except for those activities necessary for the training, logistics, and mobilization deployment of Fort Bragg soldiers. Fort Bragg is logistically divided up into the following business centers: Public Works, Readiness, Community Activities, Health Care, Telecommunications, Public Safety, Strategic Plans, and Installations.

Environmental affairs are coordinated by the Directorate of Public Works and Environment (DPWE). Hazardous wastes that are generated from the above described business centers are overseen by the DPWE, and may include oil, solvents, sealants, spill residues, photographic waste (spent fixer and developer), pesticides, fertilizers, herbicides, acid and caustic solutions, paint, and laboratory waste. Other non-hazardous wastes may include latex paint, grease, used oil, antifreeze, asbestos, and low level radiological waste from the medical laboratories.

Historically, the base operated a permitted hazardous waste storage facility managed by the Defense Reutilization and Marketing Organization (DRMO) which contracts for off-site disposal of RCRA regulated hazardous waste. The facility has closed the permitted storage area.

The base operates two less than 90-day hazardous waste storage areas. One is operated by the base hospital (Womack Army Hospital) and the second is operated by the Public Works Business Center (PWBC). Hazardous waste is accumulated at over 700 satellite accumulation areas (SSAs) located throughout the Fort Bragg facility.

9) Inspection Findings

The inspection began with an opening conference at 9:00 a.m. on June 11, 2013. Credentials were presented to Shawn Hardee with Fort Bragg. A closing conference was held on June 11, 2013, following the inspection, to discuss the findings.

PWBC Less than 90-Day Hazardous Waste Storage Area (PWBC Storage Area)

The facility has a standard policy to label containers with a "date established." This date reflects the date on which waste was added to the container at the SAA. Fort Bragg's policy is to add the start date for the less than 90-day hazardous waste storage area when the container arrives at the PWBC Storage Area.

This area uses 15 individual portable storage buildings which each have secondary containment and ventilation. All buildings are designated for specific waste streams which provide separation of incompatibles. The inspectors observed all of the containers inside of the portable storage buildings and found no violations; however, there were five 55-gallon drums which had been off

loaded in the storage area which were observed to have no date and another five 55-gallon drums that were not labeled with the words "Hazardous Waste" (See Picture #1).

Pursuant to 15A NCAC 13A .0107(c) [40 CFR § 262.34(a)(2)], the date upon which each period of accumulation begins must be clearly marked and visible for inspection on each container.

Pursuant to 15A NCAC 13A .0107(c) [40 CFR § 262.34 (a)(3)], a container holding hazardous waste that is located in a less than 90-day hazardous waste storage area must be labeled with the words "Hazardous Waste" or other words that describe the contents of the container.

The "soil yard" area is located within the PWBC Storage Area. During the inspection the inspectors remarked to facility personal that the soil yard should be identified on the PWBC Storage Area emergency contingency plan. The area was observed to contain 20 55-gallon drums of solvent bottoms which were waiting to be distilled. One of these containers was observed without an accumulation start date and many of the containers were stored in a manner which prevented access due to the lack of two feet of aisle space.

Pursuant to 15A NCAC 13A .0107(c) [40 CFR § 262.34(a)(2)], the date upon which each period of accumulation begins must be clearly marked and visible for inspection on each container.

Pursuant to 15A NCAC 13A .0110(c) [40 CFR § 265.35], the owner or operator must maintain aisle space of at least two feet to allow the unobstructed movement of personnel, fire prevention equipment, spill control equipment, and decontamination equipment to any area of facility operation in an emergency.

Womack Army Hospital

The Womack Army Hospital is a large hospital facility, which manages its hazardous waste in SAAs that are located throughout the facility. Once the containers of hazardous waste within the SAA areas reach 55-gallons, they are transferred to the less than 90-day hazardous waste storage area. This area is located outside in its own building behind the hospital.

The inspectors visited the less than 90-day hazardous waste storage area. No hazardous waste was observed during this portion of the inspection.

The following SAAs were observed during the inspection:

Micro Biology Lab – Two 5-gallon waste accumulation containers were observed in this area, Tri-Chrome stain and Siemens micro scan agents. Both of these containers were observed to be closed and properly labeled.

In Patient Pharmacy – One 5-gallon container of P-listed waste was observed. The container was observed to be closed and properly labeled. Because the container was larger than one quart; at the time of the inspection the inspectors discussed using a smaller container to eliminate the possibility of exceeding one quart of accumulation.

Out Patient Pharmacy – One container was being used for accumulation of P-listed waste. The container was observed to be closed and properly labeled.

Oncology - Three 5-gallon waste accumulation containers were observed in this area, Mitomycin, Trisenox (arsenic), and Cytosan. All of these containers were observed to be closed and properly labeled.

Joint Armament Facility (JAF)

The primary waste generated at the JAF is lead and solvent contaminated swatches from weapons cleaning. Waste swatches are accumulated in 5-gallon metal cans which are emptied daily into a 55-gallon accumulation container located in the same room. The 55-gallon container was properly labeled and closed.

Also located in this area was a shot blast media. The facility through generator knowledge believed this material to be non-hazardous. At the time of the inspection, the inspectors did not ask for or observe the waste determination documentation to prove that this waste is non-hazardous.

Records Review

This facility was last inspected by NCDENR on August 8, 2012. The inspection team reviewed records from the date of the previous inspection to the present date.

The facility had two Contingency Plans for 2013, one for each of the less than 90-day hazardous waste storage areas. The contingency plan for the PWBC Storage Area was reviewed. This contingency plan should be updated to include the soil area.

A review of the contingency plan for Womack Army Hospital was conducted. This contingency plan noted two alternate emergency coordinators, one of which no longer worked at the hospital. It is recommended that the contingency plan should be updated to reflect this.

A review of the manifests from 2012 and 2013 was conducted. At the time of the inspection, all of the manifests were complete and current. Manifest information is provided below. No apparent RCRA violations were observed.

TSD Facilities:

Safety Kleen
AES Environmental

Facility Name EPA ID #

NCD 980 846 935
KYD 985 073 196

Transporters:

Safety Kleen
Clean Harbors
Robbie D. Wood
American Trans. Solutions

Transporter Name EPA ID #

TXR 000 081 205
TXR 055 141 378
ALD 067 138 891
PAR 000 521 740

A review of the training records for the 2012 and 2013 was conducted. At the time of the inspection, all of the training was complete and current. Only ten contractors are trained to handle hazardous waste in the PWBC. Training records for each of these individuals were reviewed and

the requirement to train these individuals was discussed. No apparent RCRA violations were observed.

Inspections logs were reviewed for 2012 and 2013. At the time of the inspection, all of the inspections logs were complete and current. No apparent RCRA violations were observed.

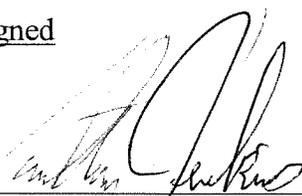
The LDR certification, exception reports, waste minimization certification, and the bi-annual report were also reviewed. The records appeared to be complete.

10) Conclusion:

The facility was inspected as a LQG and was found to be out of compliance at the time of the inspection. The NCDENR will be following up with the facility ensuring that the facility correct the deficient issues noted in this CEI.

Also, it is recommended that the facility update their contingency plans to reflect the soil area and to ensure that the alternate emergency coordinator list is up to date.

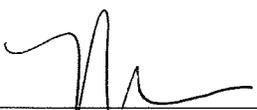
11) Signed



Tony Jenkins
Environmental Engineer

4/1/2014
Date

12) Concurrence



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

4/1/2014
Date

Photo Log



Picture 1: PWBC Storage Area - Off loaded containers. Five of these 55-gallon containers were not marked with an accumulation start date and five were not labeled with the words “Hazardous Waste.”



Picture 2: Picture of hazardous waste containers in the “soil yard.” One 55-gallon container in the “soil yard” was not marked with an accumulation start date. Additionally, there was not two feet of aisle space available in the “soil yard” as required.