TENNESSEE DEPARTMENT OF ENVIRONMENT AND CONSERVATION
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January 7, 2013

CERTIFIED MAIL
7010 0290 0002 6769 4858

Lieutenant Colonel Norbert A. Fochs
US Army Commanding Officer
Milan Army Ammunition Plant
2280 Hwy. 104 West
Milan, TN 38358-3176

RE: Compliance Evaluation Inspection Letter
ID# TNO 21-002-0582
Gibson and Carroll County

Dear Commander Fochs:

On November 14 and 15, 2012, Mr. J.C. Goodwin–U.S. EPA Region 4, Pete Kelly, and I (with the Division of Solid Waste Management –DSWM) conducted a hazardous waste inspection of Milan Army Ammunition Plant in Milan, Tennessee. This EPA/State joint inspection evaluated compliance with applicable Resource Conservation and Recovery Act (RCRA) regulations.

The enclosed report outlines violations identified during the inspection. Corrective measures must be taken immediately to address the violations. A follow-up evaluation will be made within 30 days of confirmed receipt of this notice to verify compliance.

We appreciate the courtesy extended during our visit to your facility. If you have questions about the inspection report, please contact me at (731) 512-1374.

Sincerely,

Candy Overstreet
Environmental Specialist
Division of Solid Waste Management

cc: DSWM, NCO File
DSWM JEFO File
William Corrigan, MAAP
Jackie Arnold, AO
Charles McDowell, AO
J. C. Goodwin, U.S. EPA Region 4

HAZARDOUS WASTE INSPECTION REPORT

SITE/PHYSICAL LOCATION:

Milan Army Ammunition Plant (MAAP)
ID# TN0 21-002-0582
2280 Hwy. 104 West, Suite #1
Milan, TN 38358-3177
Gibson and Carroll County

PRIMARY CONTACT(s):

Mr. William R. Corrigan, Point of Contact
Army Environmental Coordinator
Milan Army Ammunition Plant
2280 Hwy. 104 West, Suite #1
Milan, TN 38358-3176

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Ms. Jackie Arnold, Env. Programs Mgr.
American Ordnance, LLC (AOLLC)
Milan Army Ammunition Plant
2280 Hwy. 104 West, Suite #2
Milan, TN 38358-3176

Phone: (731) 686-6078
Email: jarnold@aollc.biz

DATE/TIME OF INSPECTION:

Day 1: November 14, 2012, beginning at 9:30 AM
Day 2: November 15, 2012, beginning at 9:00 AM

INSPECTION PARTICIPANTS:

Lieutenant Colonel Norbert A. Fochs, US Army Commanding Officer–MAAP
Mr. Bruce Niven, General Manager-AOLLC
Mr. Britt Locke, Safety-AOLLC
Ms. Jackie Arnold, Environmental Programs Manager–AOLLC
Mr. Charles McDowell, Environmental Scientist–AOLLC
Mr. Howard (Lynn) Smith, B-Line Hazard Waste Operator–AOLLC
Mr. Darrel Ellis, ADA & Demil Supervisor–AOLLC
Mr. Terry Mitchell, Demil Worker at ADA & Burning Ground–AOLLC
Mr. Scott Twilla, Chemist at Area J–AOLLC
Chief David Buroughs, Fire Department- AOLLC
Mr. J. C. Goodwin, Environmental Engineer/EPA-Region 4/RECB
Mr. Al Frakes, DSWM-Nashville Central Office
Mr. Malek Faradji, DSWM-Nashville Central Office
Mr. James (Pete) Kelly, DSWM–Jackson Environmental Field Office
Ms. Candy Overstreet, DSWM–Jackson Environmental Field Office

REPORT PREPARED BY:

Candy Overstreet, Environmental Specialist
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Division of Solid Waste Management
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PURPOSE OF INSPECTION:

This inspection was conducted to evaluate Milan Army Ammunition Plant's compliance with the applicable requirements of the rules and regulations promulgated pursuant to the Hazardous Waste Management Act, T.C.A. 68-212-101 et seq., the Hazardous Waste Reduction Act, T.C.A. 68-212-301 et seq., and Tennessee hazardous waste permit numbers TNHW-152 and TNHW-153.

FACILITY DESCRIPTION:

MAAP or the Milan Arsenal, as it is sometimes called, encompasses 22,352 acres in Gibson and Carroll counties. The facility was constructed and operations started between January 1941 and January 1942 to produce munitions for the U.S. Department of Defense (DoD). It has the general mission of manufacturing, storing, and shipping explosive ordnance, including mortar rounds, grenades, mine clearing equipment, explosive armor tiles, and other large and small-caliber military munitions. The primary operations are loading, assembly, and packaging; but ammunition storage in permitted, earth-covered concrete igloos is also a function of this facility.

MAAP's ammunition manufacturing operations are identified with North American Industry Classification System (NAICS) codes 332993 and 92811. The facility employs ±430 people. MAAP was recently issued permits in October 2012, to store hazardous waste (HW) in containers at 16 locations on the property and is allowed to open burn, detonate, and deactivate explosive munitions and components under permit numbers TNHW-152 for Container Storage and TNHW-153 for Open Burn and Open Detonation (OB/OD).

In addition to MAAP-generated HW, the facility receives for treatment waste munitions from the Iowa Army Ammunition Plant (IAAAP) and pyrotechnic waste from ARMTEC Countermeasures, TNO Co (an on-site DoD contractor known as ARMTEC or Esterline). ARMTEC is owned by Esterline Defense Technologies (Esterline), occupies Z-Line on the MAAP, and produces decoy flares used during flight refueling applications.

Hazardous waste is generated at MAAP as a result of the loading, assembly, and packing **(LAP)** of explosive-containing munitions, related support operations, and subsequent treatment of explosive-contaminated wastes. Certain of these hazardous wastes are described in the Inspection Findings of this report if encountered during the evaluation.

Note 1: Specific information about waste handling, additional facility operations, and explosive compositions may be obtained from previous MAAP compliance evaluation inspections (CEI), the 2011 annual report, the storage permit, and the OB/OD permit.

Note 2: In November 2006, American Ordnance (the current Army contractor) obtained an Installation Identification Number (TNR 00-002-3531) independent of MAAP but for the same physical location. The purpose of the number is to account for AOLLC HW generated as a result of third party contracts with foreign identities fulfilled by AOLLC.

Third party contracts are not directly affiliated with the U.S. Department of Defense. However, the installation production personnel, facilities, and support services are common to both MAAP and AOLLC in the fulfillment of third party contracts.

The exception is that AOLLC must ship third party contract generated HW and waste munitions off-site for treatment rather than use MAAP on-site thermal treatment and permitted storage units. No AOLLC third party contract HW or waste munitions was presently generated or accumulated on-site.

At this time, MAAP is manufacturing current contracts. However, we were informed that operations generally conducted at MAAP are being relocated to IAAAP and production is scheduled to cease in December of 2012. ARMTEC's DoD contract-generated waste will continue to be managed by AOLLC on the MAAP installation. Like AOLLC, ARMTEC's non-DoD contract-generated waste is shipped off-site for treatment.

INSPECTION FINDINGS:

MAAP is a large quantity generator of hazardous waste and operates 16 hazardous waste storage units including: **1)** 14 igloos, **2)** an explosive waste transfer facility (EWTF) and **3)** storage building **J-137**. Hazardous wastes not eligible for treatment on-site are shipped off-site for treatment and/or disposal.

For those reactive wastes requiring deactivation, MAAP operates two permitted waste treatment facilities: **1)** the Burning Ground **(BG)** with 12 burn pans (11 active pans & one spare) on four concrete pads and **2)** the Ammunition Destruction Area **(ADA)**. These units are all located in **Area W.**

After being received by Commander Fochs and American Ordnance Staff, we informed them of our intent to conduct a compliance evaluation inspection (CEI) of hazardous waste management areas and related records taking into account specific parameters set forth in permit TNHW-152 and TNHW-153. A brief presentation was given by Mr. McDowell outlining production of ordnance, management of hazardous and non-hazardous wastes, as well as transfer, storage, and disposal procedures at the facility.

A safety meeting was conducted to provide safety instructions to the inspection team by Mr. Britt Locke. Afterwards, Mr. McDowell provided access to operational areas for compliance inspection of the facility. The inspection included B-Line production areas and active HW management areas (BG, ADA, and Areas J, D, & F). Records at these locations are discussed in order reviewed.

INSPECTION: DAY 1

General Waste Management Description for Production Lines– All production lines are autonomous with the same type of hazardous waste accumulation setup. Each production line also segregates their waste based on reactivity for safety and management purposes.

Behind each production line are color-coded dumpsters for waste containment: a blue dumpster for solvent-contaminated rags, a yellow dumpster for non-hazardous waste (e.g., non-explosive), a green dumpster for potentially explosive-contaminated wastes, and a gray dumpster for cardboard. All scrap metal and most non-explosive contaminated cardboard generated from the lines are recycled.

Each hazardous waste satellite accumulation container and 90-day accumulation area is under the control of trained personnel and/or secured by locked access. Fire extinguishers and spill response equipment are accessible at every building. Waste management areas at B-Line were inspected at the end of Day 1; each area's inspection findings follow.

Area D (Igloos)

Fourteen earth-covered, domed igloos are permitted for one-year storage of hazardous waste within **Area D**. The igloos are equipped and maintained to store solid and liquid hazardous waste. The igloo floors are crowned in the middle and have floor drains along each wall to collect spills. Liquid HW is not stored in igloos as a waste management practice, but rather in **Building J-137**.

An operating log is kept current at each igloo with shipping and arrival dates for the hazardous waste inside. In addition, the HW operator completes an inspection log anytime a waste movement occurs at a given igloo. The igloos are maintained with adequate aisle space, all drains were secured with a drain plug, and each igloo has a spill

kit by the door. All containers were properly closed, dated, and labeled. Waste storage in each of the fourteen igloos is noted below.

Igloo **D-1105** stored 52 containers hazardous waste spent carbon (earliest date 04/18/12).

Igloo **D-1104** stored 18 drums of waste solvent/oily rags, 1 drum of crushed waste fluorescent bulbs, 2 drums of waste lead chips, and 2 drums of polysulfide waste (earliest date 10/04/12).

Igloo **D-803** stored16 thirty-gallon containers of MTV waste generated by Esterline (earliest date 10/03/12).

Igloos **D-805, D-807, D-808, D-905, D-906, D-907, D-1002, D-1003, D-1004, D-1005, and D-1102,** were empty according to inspection logs. D-907 and D1004 were inspected for verification.

Explosive Waste Transfer Facility-Area W

The **Explosive Waste Transfer Facility (EWTF)** located along the ADA access road is permitted for 10,000 lbs maximum storage capacity. Typically, munitions destined for treatment at the ADA are temporarily stored within this security-fenced area and configured for treatment.

The EWTF is a graveled area enclosed with barb wire-topped, wire-mesh fencing. Seven HW box van trailers (**T-51, T-75, T-67, T-73, T-55, T-59,** and **T-57**) are centrally located within the area and an open work-shed is along the backside. Each trailer is marked "Hazardous Waste" and are permitted to hold waste munitions for up to one year, but storage is usually for a much shorter period of time. Four trailers were holding waste at the time of inspection.

A spill kit is kept inside a metal storage cabinet at one corner of the enclosure. Spill equipment includes shovels, brooms, rakes, and Lite-Dri absorbent. A spill greater than one quart is reported to the on-base fire department. The EWTF was in satisfactory condition with legible "Hazardous Waste" placards. Metal, wood, and pallets are stored here as well.

Ammunition Destruction Area (ADA)-Area W - Records Review

The ADA performs above and belowground demolition of waste munitions under permit number TNHW-153 that was recently issued in October of 2012.

Dropped rounds are temporarily held in the **Z-X9 Barricade** until scheduled for demolition. Dropped rounds are shot aboveground because they are considered potentially activated and too dangerous to handle more than absolutely necessary. The ZX-9 barricade was empty on the day of inspection according to the inspection log.

Other routine waste munitions are shot underground in earthen pits. Ten-foot deep pits are excavated with heavy equipment, then munitions are placed in the pits, and the soil is pushed back in the pit to cover the munitions. This buffers noise from the detonation and actually produces more complete destruction, based on surface water data from ADA.

Non-hazardous, explosive-contaminated scrap metal generated at the ADA is retrieved and taken to the BG for flashing before going on to the Scrap Yard. No hazardous waste is generated at the ADA. MAAP sends decontaminated (i.e., flashed) debris and ash to the on-site Class II industrial landfill (Permit No.: IDL 27-101-0085).

Fire Department-Area F

The fire department, located in Area F, is manned twenty four hours a day, seven days a week. At the time of the inspection, we met with Chief Burroughs and on-duty fire fighters. Chief Burroughs conducted a tour of the facility and provided a log denoting available equipment including the HAZMAT trailer.

The emergency equipment inspection log currently in use by the fire department differed in format from the log within the newly issued OB/OD treatment permit. The AOLLC and DSWM permitting staff have resolved this minor discrepancy.

Burning Ground-Area W

Open burning of waste munitions is a treatment process that MAAP operates under permit number TNHW-153 within **Area W** that was recently issued in October 2012. The thermal treatment process allows for deactivation, open burning, or open detonation of various D003-reactive waste including propellants, explosives, pyrotechnics (PEP), and explosive-contaminated solid waste.

Waste treatment includes deactivation of complete rounds as well as munitions items and sub-components consisting of primers, detonators, fuses, and dry explosive compounds (all carry waste code D003). These explosive wastes are sometimes also hazardous for lead (D008), barium (D005), mercury (D009), and 2, 4-dinitrotoluene (D030). The OB process generates ash (WS #7) that is disposed as hazardous waste if tested positive for TCLP constituents.

Prior to 2012, four small individual miscellaneous thermal treatment units were located at the BG, but were rarely used in recent years. The four units included a gas fired oven and three different primer firing treatment units. These units were closed during the spring and summer of this year with formal written notification of their closure from DSWM given on July 10, 2012.

Eleven steel pans for waste containment and treatment are spaced about 150 feet apart on individual concrete pads. The pans are constructed of heavy steel trays mounted a few feet off the concrete on a leg frame. A thick heat-resistant material lines the tray interior. When not in use, sheet-metal covers are placed over the pans to shed precipitation. A twelfth pan, reserved as a backup replacement pan if necessary, is stored near W-59.

The BG typically conducts about three "burns" in a day if necessary. The burn pans and pad were clean swept and in good condition. In addition, covers were in place on the burn pans.

Two dedicated satellite accumulation containers are located near the burn pads. Ash from the burn pans is collected for eventual waste determination. One container is designated for MAAP-generated ash and one is for ARMTEC. On the day of inspection both satellite containers were accumulating waste. Both containers were properly closed and labeled.

Nearby in two separately fenced areas referred to as **burn pens**, explosive-contaminated bulky items are thermally flashed with wood waste such as pallets. This is not a HW treatment operation, but generates ash that is characterized for proper management and disposal. At times when the ash is determined hazardous for RCRA heavy metals, it is drummed for disposal off-site.

A 2,000-gallon **aboveground storage tank (AST) near W-59** used to collect used oil was removed on August 7, 2012. A 250-gallon AST was installed in the same location on August 9, 2012. The AST was labeled "used oil" and was in good condition.

Burning Ground-Area W - Records Review

Documents maintained at **Area W**, for the entire facility, that pertain to each movement of hazardous waste and related inspection requirements were provided for inspection by Mr. Terry Mitchell. The following inspection/inventory logs for 2011 to date were reviewed:

1) Permitted waste munitions load and unload areas;
2) Weekly Inspection Logs for Area W buildings W-10, W-59, W-60 and north holding pen;
3) Permitted Storage Weekly Inspection Log for the igloos, EWTF, and Bldg. J-137;
4) BG Security Fence Weekly Inspection Log;

5) 90-Day Areas Operating Logs;
6) Used oil records; and
7) 2011 to present manifests.

The logbooks were satisfactory. Required weekly inspections are conducted within seven-day intervals and daily inspections are conducted each day of waste activity.

Mr. Mitchell also provided records for **ADA-Area W** at this location. The load/unload daily log, security fence inspection log, Z-X9 barricade log, ADA daily inspection log, and operating log were reviewed. No deficiencies were noted.

B-Line

Building B-14 houses three production lines. B-Line currently manufactures 40-mm rounds. The general production process involves reactive powder (explosive compounds HMX, RDX, or TNT) being mechanically poured based on a calibrated amount, into a casing and then plugged with a primer. Quality control of the rounds is performed by x-ray to see if they are low on primer.

Rejected production items such as the 40-mm spitback and fuse assemblies must be evaluated before the final decision to discard them. Discarded items are typically managed in cardboard boxes. Each box is tape closed, labeled, and dated upon generation /placement within the 90-day area. LAP operations routinely generate rejected munitions, waste explosive and propellant (WS #3); explosive-contaminated solvent rags (WS #8); wastewater (WS #9); and mixed thinner waste (WS #10).

Mr. Howard (Lynn) Smith, B-Line hazardous waste operator, accompanied the inspection team to the 90-day HW accumulation area located at **Building B-14**. This area contained four boxes of various waste projectile assemblies, fuses, primer, and used fluorescent bulbs; and one satellite area accumulating a drum of solvent/oily rags.

Review of the Weekly Inspection Log for B-Line verified weekly inspections are duly noted within the logbook. The shipping and satellite area logs were satisfactory as well. Two-way communications and a spill kit are located within the accumulation locker.

Several satellite accumulation containers are utilized within B-Line. A 55-gallon satellite accumulation drum for waste ink and thinner is located in **B-14, East Ramp**. Smaller containers accumulate solid waste rags, etc. along the production line.

Specially designed, heavy-gauge steel constructed barricades located on the loading ramps at **Buildings B-19** and **B-17** serve for temporary placement of dropped rounds. Both barricades have two sandboxes to hold dropped rounds prior to disposal. Both barricades were accumulating dropped rounds.

The scrap crew from Area W picks up these rounds and other production wastes regularly for treatment or disposal. Dropped rounds are X-rayed to determine if they are activated before final disposal at ADA.

Building B-25 is a satellite accumulation area near **Building B-19**. A collection of 10 boxes with waste primer and various reject fuses were accumulated.

Four other satellite accumulation areas at B-line included: **Building B-14/bay 15** had floor sweep (D003) in a paperboard container; the **Building B-14/bay 15 Tool Room** had waste red varnish (WS #73) collecting in a 55-gallon drum; and **Building B-4/bay 2** had two containers of vacuum scrap and two containers of waste propellant. **Building B-18/East Ramp** houses waste rubber polysulfide (WS #67 a munitions sealant) in a 55-gallon drum at this satellite location. All containers inspected at B-line were closed, labeled, and dated when required, by regulation.

INSPECTION: DAY 2

RECORD REVIEW

The initial records review included: 2011 annual report, HW manifests with Land Disposal Restrictions, employee training, job descriptions, waste analysis data, contingency plan, SPCC Plan, used oil records, universal waste records, and a current HW Reduction Plan. These documents were satisfactory for review. Numerous logs required by the HW permits were reviewed on Day 1 as previously noted.

Please note the annual report is checked for completeness and accuracy by the Division's Waste Activity Audit Section. A copy of the 2011 annual report was obtained for the file.

Burning Ground-Day 2

Building W-59 serves as a 90-day HW accumulation and universal waste storage area. The container inventory included the following: one drum of HW ink solvent, one 10-gallon container of liquid labeled as "unknown" from D-Line awaiting analysis, one box of waste zinc stearate, three boxes of contaminated soil awaiting analysis, one box of waste detergent, three boxes non-PCB ballasts received from ARMTEC, three 55-gallon drums of waste paint chips, one 55-gallon drum of used oil, and one 55- gallon drum of non-hazardous waste paint. The area is equipped with a spill kit and clean rags for spills.

NOTE: A hazardous waste determination, submitted to the DSWM by Mr. McDowell since the inspection verified that the "unknown liquid" from D-Line awaiting analysis is a non-hazardous waste. An initial concern for the extended timeframe to make a determination was responded by AOLLC as being a sample analysis issue for the lab.

Building W-60 is used as a 90-day storage area. This area contained ten 55-gallon drums of used oil, four 55-gallon drums of hydraulic fluid latent soils, two hoppers of contaminated soil, seven hoppers of ash awaiting analysis, two hoppers with debris from burn pan clean outs, and two hoppers with fired M169 for flashing. As we exited W-60, there were six 55-gallon drums of used oil/filters/rags being stored by the building.

AREA J

Building J-137

Building J-137 is an enclosed metal building generally used for the storage of explosive-contaminated solvents/rags (WS #8) generated by the production lines or **Area J**. The solvents may include spent acetone, alcohol, and/or waste toluene. Waste corrosive liquids are also stored in this building prior to shipment off-site.

Building J-137 was locked when we arrived. The building had a fire extinguisher on the outside and a spill kit on the inside as required by permit. The concrete floor is protected with a polyurethane sealer. There is a scale by the cargo door. The building is properly placarded with the words "Hazardous Waste" on all four sides. Also a "PCB's Storage" sign on the outside indicates the storage of used transformers.

On the day of inspection, in storage were sixteen containers of hazardous waste including: waste red varnish, waste oil, used Varsol, waste oily debris, waste concrete additive, waste primer coat, waste ink, waste thinners, and waste lab acids.

Five containers of Universal Waste (UW) that were stored included: one 55-gallon drum of waste pesticides, three 40-gallon drums of UW batteries, and one 10-gallon bucket of UW batteries. The 10-gallon container of batteries was marked with a start date of 6/10/10 and a fill date of 7/25/12. One of the larger containers (approximately 40 gallons) of UW batteries had a start date of 11/8/10 and another had a start date of 9/20/11. The UW container dates indicated greater than one year accumulation. A UW handler must prove the need for a longer accumulation period. **This UW finding is noted in the violation section.**

Additionally, waste PCB related materials, silver waste, and twelve non-hazardous containing adhesives, inks, and ballasts were being stored. All containers at J-137 were properly closed, labeled, and dated.

Environmental Lab

The environmental lab located in **Building J-135** generates corrosive wastes that are removed to the locked satellite area. One plastic drum labeled "Lab Acid Waste" and one drum labeled "Lab Acid Solvents" were present. These drums were closed and labeled.

The inspection team then toured the Lab and observed the different kinds of equipment used to analyze samples such as High-performance liquid chromatography (HPLC) and Inductively Coupled Plasma (ICP). At the time of the inspection the HPLC was active but the ICP was not in use. A hazardous waste collection container with the drain line loosely inserted for receipt of additional waste from the ICP instrument was not closed. Mr. Twilla corrected this immediately by placing an acceptable closure on the container.

Additionally, two, open, 1-gallon containers were underneath the hood located near the ICP. Mr. Twilla stated that the containers were holding corrosive hazardous waste and immediately placed the contents into a satellite container. **These open container findings are noted in the violation section.**

Chemical/Explosive Lab

The chemical/explosive lab in **Building J-124** has three satellite accumulation containers. They include one drum labeled "Mixed Solvents", one drum labeled "Halogenated Solvents", and one box kept under hood labeled as "propellant". These containers were closed and in good condition.

The inspection log for lab waste containers and **Building J-125** was provided by Chemist, Mr. Scott Twilla, and indicated inspections are conducted weekly. The operating log for waste activity was complete as well.

COMMENTS

The facility compliance evaluation inspection concluded around 1:00 PM on the second day with an Exit Review of the inspection team findings. The MAAP commander and AOLLC environmental and safety staff were on hand for the closeout briefing. They were informed that a few of our concerns would require additional regulatory review prior to the final report; the two findings to be addressed by MAAP follow.

VIOLATION(s):

Citation #1 Universal Waste Requirements

0400-12-01-.12(2)(f)2 Accumulation Time Limits [40 CFR 273.15] states:

2. A small quantity handler of universal waste may accumulate universal waste for longer than one year from the date the universal waste is generated, or received from another handler, if such activity is solely for the purpose of accumulation of such quantities of universal waste as necessary to facilitate proper recovery, treatment, or disposal. However, the handler bears the burden of proving that such activity is solely for the purpose of accumulation of such quantities of universal waste as necessary to facilitate proper recovery, treatment, or disposal.

Observation #1: The dates on UW containers in Building J-137 indicated greater than one year accumulation. MAAP must demonstrate the need for accumulation of UW longer than one year or comply with the allotted timeframe.

Citation #2 Closed Container Requirements

0400-12-01-.03(4)(e)5(i)(I) states: A generator may accumulate as much as 55 gallons of hazardous waste or one quart of acute hazardous waste listed in Rule 0400-12-01-.02(4)(b) or (4)(d)5, 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 interim status and without complying with part 2 of this subparagraph provided he:

(I) Complies with **Rule 0400-12-01-.05(9)**(b), (c), and **(d)1.**

0400-12-01-.05(9)(d)1 states: A container holding hazardous waste must always be closed during storage, except when it is necessary to add or remove waste.

Observation #2: At the time of the inspection, the ICP was not in use with a waste drain line loosely inserted into the receiving container. Contents were being stored in the container and the container was not closed. Additionally, two small 1-gallon containers were open underneath the hood that contained corrosive hazardous waste. MAAP should be diligent to maintain closed hazardous waste containers as required by regulation.

NOTE: Mr. Scott Twilla addressed the open containers at the time of the inspection. Also, new HW container closures were recently purchased for use in the lab.

EXIT INTERVIEW:

The inspection team informed Commander Fochs and American Ordnance Staff that an Inspection Report would be issued documenting violations observed during the compliance evaluation inspection. A follow-up inspection will be made within 30 days of receipt of this report.

If there are questions regarding this report, please contact Candy Overstreet at (731) 512-1374 or James (Pete) Kelly at (731) 512-1341.

SIGNED: Candy Overstreet **DATE:** 1-8-13
Candy Overstreet, TDEC-DSWM

REVIEWED: James Kelly **DATE:** 1-8-13
James (Pete) Kelly, TDEC-DSWM