

During the inspection, I requested that Barksdale provide documentation that the spent blast media is not speculatively accumulated. I also helped Bill Lee get on to RCRA Online and print the "Lowrance Memo" which describes the difference between legitimate and "sham" recycling (Appendix 11). I went over the "criteria for evaluating whether a waste is being recycled" point by point. I explained that if Barksdale AFB wishes to claim that their spent bead blast material is not a solid waste then they need to be able to document each of the points in the memo. I discussed the meaning of toxics along for the ride at length as well as the reason why the person claiming the exemption must be able to demonstrate that the replacement material is similar to the material being replaced.

Following the inspection, Barbara Legan emailed 10 documents responding to Areas of Concern I noted in my closing conference. Seven of the ten were related to the spent bead blast media. Appendix 6 is the cover letter describing actions taken following the inspection and explaining the other attachments. Appendix 13 is an email from John Socotch at UST Media stating that from 2014-2016 UST Media had received and recycled 6042 lbs of spent media from Barksdale. A summation the total weight of spent media for that time period from the shipping documents provided by Barksdale (Appendix 12) during the inspection is 5335 lbs. Barksdale responded to an email request to explain the discrepancy by stating that the weight on the shipping documents leaving Barksdale was an estimate while the received weight by UST Media was actual weight. Note: during the inspection I verbally requested that documentation indicating that spent blast media from Barksdale had not been speculatively accumulated by US Technologies include the signature line "I certify under penalty of law that these statements are true and accurate to the best of my knowledge". This email did not include that language. In addition the email from John Socotch makes the statement that "UST Media's recycling program clearly meets all requirements addressed in the questions posed by Sylvia K. Lowrance". Appendix 14 is promotional material for UST Media. Appendix 15 is documentation that spent blast media was recycled in 2014, and 2016, but not 2015. Appendix 16 is an analysis of the Definition of Solid Waste by US Technology Media concluding that spent blast material is not a solid waste when pressed into bricks. Appendix 17 is a letter from LDEQ laying out requirements to manage the spent blast media as a product rather than a solid waste. One of the requirements was that the facility perform a hazardous waste determination. As stated previously, Barksdale could not provide a written waste determination, but stated that the spent blast material was a hazardous waste containing TCLP hazardous levels of cadmium and chromium based upon process knowledge.

When Barksdale AFB provided shipping documentation for the spent blast media, the shipping documentation (Appendix 12) indicated that the spent media was being shipped to Fort Smith, Arkansas, and Macon, Georgia. I, David Robertson, contacted personnel familiar with the RCRA program in EPA Region 4 and at ADEQ. According to Penny Wilson, ADEQ Enforcement and Inspection Branch Manager, hazardous waste staff were unaware of the US Technologies facility in Arkansas. Ms. Wilson requested and I provided a copy of the shipping documentation and the ADEQ letter (Appendix 10). I spoke with Larry Lamberth, South Enforcement and Compliance Section Chief EPA Region 4. Mr. Lamberth stated that he had concerns about the legitimacy of the recycling in Macon, Georgia. Mr. Lamberth stated that some of the spent bead blast material had been used as "fill" at the Middle Georgia Speedway (MGS) and provided contact information for a Region 4 Superfund On Scene Coordinator (OSC). The OSC provided a Final Removal Investigation Letter Report (Appendix 18). The report states: