EPA United States Environmental Protection Agency

EPA REGION 10 Enforcement and Compliance Assurance Division

INSPECTION REPORT

Inspection Entry Date/Time	07/31/2024 09:30 AM (PT)	Announced: Yes
Inspection Exit Date/Time	07/31/2024 01:20 PM (PT)	Access: Granted
Weather	56°F, Sunny	
Media	Water	
Statute(s)/Program(s)	Clean Water Act, NPDES, Stormwater – Industrial	
Type of Inspection	Compliance Evaluation Inspection	
Permittee Name	Benjamin Storey – AKDOT&PF	
Site Name	Petersburg James A Johnson Airport	
Site Physical Address	1450 Haugen Drive	
City, State, Zip Code	Petersburg, Alaska 99833	
Borough	Petersburg	
Facility GPS Coordinates	56.810288, -132.943912	
Mailing Address	P.O. Box 112506	
City, State, Zip Code	Juneau, Alaska 99811	
FRS ID	110070519480	
Permit Number	AKR06AC89	
SIC	4581 (Airports, Flying Fields & Services)	

Lead Inspector:			
RAYMOND ANDREWS	Digitally signed by RAYMOND ANDREWS Date: 2024.08.27 07:48:18 -07'00'		
Raymond Andrews	EPA Region 10	andrews.raymond@epa.gov	(206) 553-4252
Supervisor Review:			
PETER CONTRERAS	Digitally signed by PETER CONTRERAS Date: 2024.08.27 08:22:38 -07'00'		
Peter Contreras	EPA Region 10	contreras.peter@epa.gov	(206) 533-6708

SECTION I – Opening Conference

I arrived at the Petersburg James A Johnson Airport (the "Site" or "Facility"), located at 1450 Haugen Drive, Petersburg, Alaska, at 09:30 AM (PT) on 07/31/2024 for an announced inspection. I presented my credentials to Benjamin Storey and informed him I was there to determine compliance with the Clean Water Act (CWA), and the facility's National Pollutant Discharge Elimination System (NPDES) permit, permit # AKR06AC89. This report is based on information supplied by facility representatives, direct observations made by me, and records and reports maintained by the facility. In addition, information gathered prior to, or after, the Inspection from a review of EPA, State, and/or public records may be included in this report.

Attendees

Organization	Attendee Name	Title	Present in Opening Conf.	Present in Closing Conf.
EPA Region 10	Raymond Andrews	Lead Inspector	Yes	Yes
AKDOT&PF	Ben Storey	Regional Environmental Manager	Yes	Yes
AKDOT&PF	Ivar Enge	Equipment Operator	Yes	Yes

Facility Information

Responsible official?	Erik Norberg; eric.norberg@alaska.gov cc: Ben Storey and Barry Youngberg
Type of Operation?	Airport
Industrial Sector?	Sector S (Air Transportation)
Is property owned?	The State of Alaska owns and operates the airport.
Site size?	The fence line bounded area is 50.69 acres.
Years in operation?	The runway was built in 1967. The current primary building was built in 1995.
Number of employees?	The facility has five employees including the mechanic.
Hours/Days of operation?	The facility operates from 6am until 4:30pm Monday through Friday during Summer operations. During Winter operations, the facility operates Monday through Friday from 5am until 4pm.
Industrial activities exposed to stormwater?	During winter, the facility conducts de-icing operations on the runway. The facility conducts all vehicle maintenance inside the building.
Personnel conducting inspections/sampling	Barry Youngberg conducts all sampling and inspections for the site. The facility is only required to conduct quarterly visual assessments (QVAs). The facility is not required to conduct water sample analysis because the facility does not use 100 tons or more of urea or 100,000 gallons of pure glycol in glycol-based deicing fluids.
What is your monitoring frequency?	The facility is only required to do Quarterly Visual Inspections.
Sampling locations?	Samples are collected at seven designated outfalls identified on the SWPPP map.
Receiving Water?	Stormwater first enters Mill and Hammer sloughs which empty into Wrangell Narrows.
Number/location of Outfalls?	The site does not have catch basins. The entirety of the stormwater that lands on the site sheet flows to the vegetated area surrounding the paved areas.

Stormwater Treatment?	The facility does not conduct active treatment. All stormwater runoff leaves the paved area and enters a vegetated area where it infiltrates.
Industrial activities exposed to stormwater?	The only industrial activity exposed to stormwater is de-icing operations. The facility uses a new de-icer called New Deal, which binds to the soil.
Type of materials and/or vehicles stored outdoors?	The facility has a large stockpile of sand on site. The pile is uncovered but the pile lays at the end of a downslope path off the road and a vegetated area bounds the rear of the pile.

SECTION II – Observations

No observations were made that constitute an area of concern.

SECTION III – Records Review

Records may not be in sequential order.

Record: Other - SWPPP Map		**AOC:** No
Ref #: RA1-RR-007	**Reviewed By:** Raymond Andrews	**Reviewed Date:** 07/31/2024
At the time of the inspection, I reviewed the facility's SWPPP map. It appeared to have all required components. No areas of concern were identified.		
Record: Other - Quarterly Visual Assessments (QVAs)		**AOC:** Yes
Ref #: RA1-RR-006	**Reviewed By:** Raymond Andrews	**Reviewed Date:** 07/31/2024
At the time of the inspection, I requested to review QVAs from 1Q 2020 through 2Q 2024. The QVAs were not signed in accordance with Appendix A, part 1.12. The QVAs were not documented as required by the permit, i.e., there was no photo documentation.		
Record: Other - Routine Facility Inspections		**AOC:** Yes
Ref #: RA1-RR-005	**Reviewed By:** Raymond Andrews	**Reviewed Date:** 07/31/2024
At the time of the inspection, I reviewed the facility's routine facility inspections from January 2020 through June 2024. The facility's routine inspection reports were not sign in accordance with Appendix A, part 1.12 of the permit.		
Record: Annual Reports		**AOC:** Yes
Ref #: RA1-RR-004	**Reviewed By:** Raymond Andrews	**Reviewed Date:** 07/31/2024
At the time of the inspection, I reviewed the facility's available Annual Reports. The only Annual Reports in the SWPPP binder were for the 2022 and 2023 reporting years so those were the only reports I reviewed. The Annual Report for the 2023 reporting year was signed March 30, 2023. This only accounts for a quarter of the reporting year.		
Record: Other - Employee Training Records		**AOC:** Yes
Ref #: RA1-RR-003	**Reviewed By:** Raymond Andrews	**Reviewed Date:** 07/31/2024
At the time of the inspection, I reviewed the facility's employee training records. The SWPPP binder contained certificates showing employee training was completed but there were no dates of when the training was completed.		

Record: SWPPP		**AOC:** Yes
Ref #: RA1-RR-002	**Reviewed By:** Raymond Andrews	**Reviewed Date:** 07/31/2024
At the time of the inspection, I reviewed the facility's Stormwater Pollution Prevention Plan (SWPPP), with a preparation date of October 9, 2020. The SWPPP needs to be updated. One member listed as a member of the SWPPP Team has retired.		
Record: Other - EPA's Integrated Compliance Information System (ICIS) Database		**AOC:** Yes
Ref #: RA1-RR-001	**Reviewed By:** Raymond Andrews	**Reviewed Date:** 07/30/2024
Prior to the inspection, I reviewed a report from EPA's ICIS database covering the period from June 2019 through 2024. The report indicated the facility failed to submit Annual Reports for the years 2020 through 2023.		

SECTION IV – Sampling Activities

No sampling was conducted.

SECTION V – Areas of Concern

Areas of Concern may not be in sequential order.
The presentation of Areas of Concern does not constitute a formal compliance determination or violation.

AOC Reference #: RA1-RR-001	**Records Review: Other - EPA's Integrated Compliance Information System (ICIS) Database**
Permit Requirement Part 9.2 of the permit states, in part, "A permittee must submit an annual report to DEC...By February 15th of the year following the reporting year..."	
AOC: The facility failed to submit Annual Reports for the years 2020 through 2023.	
AOC Reference #: RA1-RR-002	**Records Review: SWPPP**
Permit Requirement Part 5.6.5 of the SWPPP states, in part, "The SWPPP must be updated at least annually."	
AOC: The SWPPP is not being updated annually.	
AOC Reference #: RA1-RR-003	**Records Review: Other - Employee Training Records**
Permit Requirement Part 5.8.5 of the Permit states, "Records of employee training, including date training received."	
AOC: Employee training documentation does not include the date the training was received.	
AOC Reference #: RA1-RR-004	**Records Review: Annual Reports**
Permit Requirement Part 9.2 of the permit states, in part, "A permittee must submit an annual report to DEC...By February 15th of the year following the reporting year, the permittee must submit the annual report to DEC..."	
AOC: The facility's 2023 Annual Report only covered the first three month of the reporting year.	

AOC Reference #: RA1-RR-005	Records Review: Other - Routine Facility Inspections

Permit Requirement
Appendix A, Part 1.12.5 of the permit states, "Any person signing a document under Appendix A, Part 1.12.2 or Part 1.12.3 shall certify as follows:

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations." "

AOC:
The facility's routine inspection reports were not signed in accordance with Appendix A, part 1.12 of the permit.

AOC Reference #: RA1-RR-006	Records Review: Other - Quarterly Visual Assessments (QVAs)

Permit Requirement
Appendix A, Part 1.12.5 of the permit states, "Any person signing a document under Appendix A, Part 1.12.2 or Part 1.12.3 shall certify as follows:

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations." "

AOC:
The QVAs were not signed in accordance with Appendix A, part 1.12.

AOC Reference #: RA1-RR-006	Records Review: Other - Quarterly Visual Assessments (QVAs)

Permit Requirement
Part 6.2.2 of the permit states, in part, "A permittee must document the results of their visual assessments and maintain this documentation onsite with the SWPPP...documentation of the visual assessment must include...Photographs of sample and sample location..."

AOC:
The QVAs were not documented as required by the permit, i.e., there was no photo documentation.

SECTION VI – Closing Conference
I held a closing conference with Facility personnel at 01:20 PM (PT) on 07/31/2024 for the inspection. During the closing conference, I discussed the observations and Areas of Concern I identified during the inspection. Observations and Areas of Concern have not yet been evaluated for a formal compliance determination.

SECTION VII – List of Appendices

1. Photo Log

APPENDIX 1: Photo Log

All photos were taken by Lead EPA Inspector, Ray Andrews, during the inspection.

Photos were not manipulated beyond minor cropping for sizing and labels or callouts to draw attention to the subject of the photo.

All photos taken during the inspection are included in the Photo Log; however, only photos that support an Observation or Area of Concern are included in the inspection report.

- **P1020019** – Sand Pile, photo 1
- **P1020020 –** Sand Pile, photo 2
- **P1020021 –** Outfall to Miller Slough
- **P1020022 –** Culvert, transfers water runoff from one side of the road to the other side for discharge into one of the sloughs