

EPA REGION 10 Enforcement Division

INSPECTION REPORT

Inspection Entry Date/Time	03/09/2023 08:30 AM (AKT)	Announced: No	
Inspection Exit Date/Time	03/09/2023 11:39 AM (AKT)	Access: Granted	
Regulatory Program	RCRA		
Type of Inspection	Compliance Evaluation Inspection (CEI)		
Company Name	Walmart, Inc.		
Facility or Site Name	Walmart Supercenter #2722		
Facility/Site Identifier	AKR000200808		
Facility/Site Physical Address	537 Johansen Expressway		
City, State, Zip Code	Fairbanks, AK 99701		
County/Borough	Fairbanks North Star Borough		
Generator Status	Small Quantity Generator (SQG)		
NAICS	452311		
Type of Operation	Warehouse Clubs and Supercenters		
Geographic Coordinates	64.85813, -147.6915		
Mailing Address/Secondary Address	Mr. Andrew Mierek, Store Manager admiere.s02722.us@wal-mart.com 537 Johansen Expressway Fairbanks, AK 99701 Cc: Mr. Sean Schoephoerster, Asset Protection Operations Coach sps0045.s02722.us@wal-mart.com Mr. Neil Walters, Senior EH&S Manager neil.walters@walmart.com Jamie Huens jamie.huens@walmart.com Mr. Derek Warren, Senior Manager II, EH&S Compliance (Supply Chain) derek.warren@walmart.com		
City, State, Zip Code	Fairbanks, AK 99701		
Permit Number (If Applicable)	Not Applicable		
Lead Inspector:			
Jon Jones	JONATHAN JONES	Digitally signed by JONATHAN JONES Date: 2023.07.26 12:04:08 -08'00'	
	EPA REGION 10	Jones.Jon@epa.gov	(907) 271-6329
Supervisor Review:			
Matt Quarterman	MATTHEW QUARTERMAN	Digitally signed by MATTHEW QUARTERMAN Date: 2023.07.31 14:19:38 -07'00'	
	EPA REGION 10	Quarterman.Matthew@epa.gov	(206) 553-2146

SECTION I – INTRODUCTION

Site Entry and Purpose of the Inspection

Type of inspection: Compliance Evaluation Inspection (CEI)

EPA Region 10 Lead Inspector, Jon Jones, arrived at the Walmart Supercenter #2722 Facility (the "Site" or "Facility"), located at 537 Johansen Expressway, Fairbanks, AK 99701, at 08:30 AM (AKT) on 03/09/2023 for an unannounced inspection. EPA Region 10 Lead Inspector presented credentials and informed Andrew Mierek that this was an EPA Region 10 inspection to determine compliance with Resource Conservation and Recovery Act (RCRA).

The facility was inspected to ensure compliance with standards for hazardous waste generators and universal waste management (40 C.F.R. Part 262 through 273) and used oil management (40 C.F.R. Part 279). The inspection was conducted as part of a Core Program requirement for FY 2023.

This report is based on information supplied by Walmart Supercenter #2722 Facility representatives, observations made by the EPA Region 10 inspector, and records and reports maintained by the facility and its HQ including, but not limited to: direct observations made by the EPA Region 10 Inspector(s), photographs taken by EPA Region 10 inspector(s), physical evidence collected by the EPA Region 10 inspector(s), measurements or samples taken by EPA Region 10 inspector(s), verbal or written statements made by information supplied by the facility representatives during or subsequent to the on-site Inspection, and materials, processes, data, photographs, or documents shown, demonstrated, or submitted to the EPA Region 10 inspector(s) by the facility representatives during or subsequent to the on-site Inspection. In addition, information gathered prior to or subsequent to the Inspection from a review of USEPA, State, and public records may be included in this report.

Attendees

Title/Organization	Name	Phone	Email	Opening Conf.	Closing Conf.
Lead Inspector/EPA REGION 10	Jon Jones	(907) 271-6329	Jones.Jon@epa.gov	Yes	Yes
Store Manager/Walmart, Inc.	Andrew Mierek	(907) 451-9900	admieri.s02722.us@wal-mart.com	Yes	Yes
Hazardous Waste Program Specialist/Alaska Department of Environmental Conservation (ADEC)	Ashley Streveler	(907) 269-4556	ashley.streveler@alaska.gov	Yes	Yes
Asset Protection Operations Coach/Walmart, Inc.	Sean Schoephoerster	(907) 451-9900	sps0045.s02722.us@wal-mart.com	No	Yes
Store #4359 Manager/Walmart, Inc.	Mike Morris			No	Yes

Opening Conference

Shortly after arriving at Walmart Supercenter #2722, Mr. Andrew Mierek, Store Manager, took me to his office where I held the opening conference.

During the opening conference, I explained that the focus of the RCRA inspection was to identify types of wastes

generated, points of waste generation, methods of waste management, and review relevant documents.

Only those areas in which I observed potential compliance concerns or noted other pertinent issues are discussed in Section III of this inspection report.

Facility/Site Information

Number of employees	Approximately 350 employees
Length of Facility at Location	Since 2004
Operating Hours	6:00 am to 11:00 pm, 7 days a week
Safety Training Provided to Inspector(s)?	No
Size of Facility	Unknown
What type of generator facility notified?	Small Quantity Generator (SQG)
What type of generator facility verified as?	Small Quantity Generator (SQG) verified by facility personnel
Weather Conditions	Cold and snowy

Process Description

During the opening conference, Mr. Mierek told me the wastes generated at the facility were generated either due to product being damaged as it enters the store through receiving, damaged on the shelf at the store, or customer returns that cannot be resold. The facility also generates waste aerosol cans and used oil in the Automotive shop. There is an on-site pharmacy that generates hazardous waste pharmaceuticals (HWPharms) and ships potentially creditable pharmaceuticals to a reverse distributor.

I was accompanied during the inspection by Mr. Mierek. I looked at the facility's processes, hazardous waste management practices, generation points, and accumulation areas. I looked for wastes that facility representatives had not yet identified or designated as hazardous.

Building(s)

Building/Area/Sub-area	Process Description	Area of Concern
Main Store Building		Yes
Automotive Service	Generation of waste aerosol cans and used oil	Yes
Basement/Pit	Used oil collection from the crushing of used oil filters	Yes
Service Bays	Waste aerosol can satellite accumulation area (SAA)	Yes
Pharmacy	Generation of hazardous waste pharmaceuticals	No
Receiving Area	Central Accumulation Area (CAA)	Yes
Central Accumulation Area (CAA)	Accumulation of hazardous wastes and universal wastes	Yes

SECTION II – OBSERVATIONS

Building: Main Store Building/Automotive Service/Basement/Pit			
Observation #: JJ1-OB-001	Date: 03/09/2023	Contains AOC: Yes	Contains CBI: No
Person Interviewed: Andrew Mierek		Title: Store Manager	
While in the Automotive Service area I met with Mr. Paul Woodard, Service Technician. According to Mr. Woodard, he has been employed with Walmart for 12+ years. We went down into the basement/pit beneath the Automotive Service area, and while there, I saw a five-gallon container of used oil that was beneath an oil filter crusher. The container held approximately four to four and a half gallons of used oil. Mr. Woodard also verified the amount of used oil in the container was between four and four and a half gallons. At the time of the inspection, the five-gallon container that held used oil was not labeled with the words, "Used Oil." Mr. Woodard labeled the container with the words "Used Oil" during the inspection.			
Photo(s) 1. IMG_0629.jpg 2. IMG_0630.jpg			

Building: Main Store Building/Automotive Service/Basement/Pit			
Observation #: JJ1-OB-002	Date: 03/09/2023	Contains AOC: Yes	Contains CBI: No
Person Interviewed: Andrew Mierek		Title: Store Manager	
While still inspecting the basement/pit beneath the Automotive Service area, I saw a used oil tank with an attached hydraulic filter crusher. The tank was approximately 50 gallons in size and according to the site gauge on the tank it held a few gallons of used oil. Mr. Woodard stated that it held approximately two gallons of used oil. At the time of the inspection, the tank was not labeled with the words "Used Oil." Mr. Woodard labeled the tank with the words "Used Oil" during the inspection.			
Photo(s) 1. IMG_0631.jpg 2. IMG_0632.jpg			

Building: Main Store Building/Automotive Service/Service Bays			
Observation #: JJ1-OB-003	Date: 03/09/2023	Contains AOC: Yes	Contains CBI: No
Person Interviewed: Andrew Mierek		Title: Store Manager	
While inspecting the service bays in the Automotive Service Department, I saw a cloth hamper that was being used to accumulate aerosol cans. I asked about the aerosol cans and Mr. Woodard told me that they were waste aerosol cans. At the time of the inspection, the waste aerosol cans were not in a closed container, and they were not labeled with the words "Hazardous Waste" or a hazard indicator. At the time of the inspection, waste aerosol cans were being managed as hazardous waste in the facility's CAA.			

Photo(s)

1. [IMG_0633.jpg](#)
2. [IMG_0634.jpg](#)
3. [IMG_0635.jpg](#)
4. [IMG_0638.jpg](#)

Building: Main Store Building/Automotive Service/Service Bays

Observation #: JJ1-OB-004 **Date:** 03/09/2023 **Contains AOC:** Yes **Contains CBI:** No

Person Interviewed: Andrew Mierek **Title:** Store Manager

While I continued to inspect the service bays in the Automotive Service Department, I saw a waste aerosol can of WD-40 lubricant in a trash receptacle. Mr. Woodard removed the waste aerosol can from the trash receptacle and placed it in the cloth hamper with the other waste aerosol cans that had been observed earlier.

Photo(s)

1. [IMG_0639.jpg](#)

Building: Main Store Building/Receiving Area/Central Accumulation Area (CAA)

Observation #: JJ1-OB-005 **Date:** 03/09/2023 **Contains AOC:** Yes **Contains CBI:** No

Person Interviewed: Andrew Mierek **Title:** Store Manager

I went to the facility's Central Accumulation Area (CAA) and while there I met Ms. Kelly Meeks, Asset Protection Team Lead. While inspecting the wastes being accumulated in the CAA, I saw a small box that was labeled with the words "Lithium Batteries." I asked about the batteries in the box, and I was told by store associates that the box held waste batteries. At the time of the inspection, I saw at least two waste lithium batteries inside of the container. At the time of the inspection, the box containing the waste lithium batteries was not labeled with either the phrase "Universal Waste - Batteries," "Waste Batteries," or "Used Batteries."

Photo(s)

1. [IMG_0640.jpg](#)
2. [IMG_0641.jpg](#)

Building: Main Store Building/Receiving Area/Central Accumulation Area (CAA)

Observation #: JJ1-OB-006 **Date:** 03/09/2023 **Contains AOC:** Yes **Contains CBI:** No

Person Interviewed: Andrew Mierek **Title:** Store Manager

While still in the CAA, I also saw a box that was labeled with the words "Alkaline Batteries." I looked inside the container and saw that there was a button style (Lithium) battery and an AA, Ni-MH (Nickel Metal Hydride) battery mixed in with the alkaline batteries. At the time of the inspection, the container was not labeled with either the phrase "Universal Waste - Batteries," "Waste Batteries," or "Used Batteries."

Photo(s)

1. [IMG_0642.jpg](#)

Building: Main Store Building/Receiving Area/Central Accumulation Area (CAA)			
Observation #: JJ1-OB-007	Date: 03/09/2023	Contains AOC: Yes	Contains CBI: No
Person Interviewed: Andrew Mierek		Title: Store Manager	
While still inspecting the facility's CAA, I observed several boxes being used to accumulate four-foot and eight-foot waste fluorescent lamps. The waste lamp boxes I observed during the inspection were marked with hazardous waste labels and accumulation start dates. I inquired as to why they were managing the lamps as a hazardous waste and the response I received from store associates was, "How are they supposed to be managed?" I told them that the majority of generators manage their waste lamps as universal waste. I also told them that they were being managed as universal waste during the last inspection that I conducted on 6/20/2013. I explained that they could be managed either as hazardous waste or universal waste. After speaking with Ms. Meeks and the others, regarding the management of waste lamps, I was not convinced that they had a good understanding of either hazardous waste or universal waste management practices. I explained the differences between management as a hazardous waste versus universal waste and then indicated that a waste determination might be required. At the time of the inspection, the box containing the four-foot waste lamps was labeled with the words "Hazardous Waste" and was marked with an accumulation start date of 12/7/22. The box was not marked with a hazard indicator. Due to the lack of a hazard indicator, it was apparent to me that the facility was either not conducting weekly inspections of the CAA or thorough inspections were not being conducted. Store associates marked the box with a hazard indicator of "TOXIC" during the inspection. The eight-foot box being used to accumulate waste lamps was also labeled with the words "Hazardous Waste," but was empty.			
Photo(s) 1. IMG_0643.jpg 2. IMG_0644.jpg 3. IMG_0645.jpg 4. IMG_0646.jpg 5. IMG_0655.jpg			

Building: Main Store Building/Receiving Area/Central Accumulation Area (CAA)			
Observation #: JJ1-OB-008	Date: 03/09/2023	Contains AOC: Yes	Contains CBI: No
Person Interviewed: Andrew Mierek		Title: Store Manager	
While still inspecting the facility's CAA, I saw a yellow flammable storage cabinet. I opened the cabinet and saw five containers that were being used to accumulate ignitable wastes. Each container had an approximate capacity of five gallons. There were two containers on the top shelf of the cabinet and three containers on the bottom shelf. One of the containers on the bottom shelf was empty. At the time of the inspection, a five-gallon container on the top shelf, being used to accumulate waste alcohol, was not marked with a hazard indicator and a five-gallon container on the bottom shelf, being used to accumulate waste heating oil, was also not marked with a hazard indicator. Due to the lack of a hazard indicator, it was apparent to me that the facility was either not conducting weekly inspections of the CAA or thorough inspections were not being conducted. Store associates marked each of the two containers with the hazard indicator "Ignitable" during the inspection.			

Photo(s)

1. [IMG_0650.jpg](#)
2. [IMG_0651.jpg](#)
3. [IMG_0652.jpg](#)
4. [IMG_0653.jpg](#)
5. [IMG_0654.jpg](#)

Building: Main Store Building/Receiving Area**Observation #:** JJ1-OB-010**Date:** 07/21/2023**Contains AOC:** Yes**Contains CBI:** No**Person Interviewed:** Andrew Mierek**Title:** Store Manager

While viewing the photos taken during the inspection, I saw a black, five-gallon container, holding hazardous waste pharmaceuticals in photo IMG_0647.jpg. The container was marked with a hazardous waste label and the words "Pharmaceutical Hazardous Waste" were written on the label. The container was marked with the date 2/1/23.

At the time of the inspection, the container was not labeled with the words "Hazardous Waste Pharmaceuticals."

Photo(s)

1. [IMG_0647.jpg](#)

SECTION III – RECORDS REVIEW**Record:** Inspections**AOC:** Yes**Ref #:** JJ1-RR-001**Reviewed By:** Jon Jones**Reviewed Date:** 03/09/2023

During the records review portion of the inspection, I asked to see the facility's weekly hazardous waste inspection logs for the last three years, covering the period from 3/9/20 through 3/9/23. According to Messrs. Mierek and Schoephoerster the inspections logs were in an electronic format.

Due to time constraints on the day of the inspection, I asked Messrs. Mierek and Schoephoerster if they could just email the inspection logs to me. Mr. Schoephoerster said that he could send me a copy of the inspection log and said that it was approximately three pages, showing the inspectors name and the date and time of the inspection. I told Messrs. Mierek and Schoephoerster that I would send them an email through a platform that would allow them to drag and drop all of the requested information into a file that could be emailed back to me.

On 3/24/23, I sent an email to Mr. Mierek. In that email, I stated "Our email platform for sending/receiving documents is currently not working. So, in the meantime, can you please just email the weekly inspections covering the period of 3/9/23 through 3/9/20. I will figure something out for getting the manifests and get back with you. Let me know if you have any questions. Thank you for your patience."

Mr. Mierek responded to my email on 3/24/23, stating "All of this is in the system. The problem I have is the time and size of the file to collect all these. I was hoping you would have a better way of getting this together."

The inspection logs were never sent.

Record: Manifests		AOC: Yes
Ref #: JJ1-RR-002	Reviewed By: Jon Jones	Reviewed Date: 07/06/2023
On 7/6/23, I emailed the facility's RCRAInfo site contact, Mr. Neil Walters, in an attempt to acquire documentation that I had requested during the 3/9/23 inspection. In that email I expanded that document request to include a copy of the disposal paperwork for the last shipment of waste fluorescent lamps that left facility #2722. In that request, I asked that the information be provided on or before 7/20/23. At the time this inspection report was completed, a copy of the requested disposal paperwork for the last shipment of waste fluorescent lamps that left facility #2722 has not been received.		
Record: Ensure applicable employees are trained – SQG		AOC: Yes
Ref #: JJ1-RR-003	Reviewed By: Jon Jones	Reviewed Date: 07/06/2023
On 7/6/23, I emailed the facility's site contact, Mr. Neil Walters, in an attempt to acquire documentation that I had requested during the 3/9/23 inspection. In that email I expanded that document request to include copies of training records or training certificates for store associates that manage hazardous waste, universal waste, and hazardous waste pharmaceuticals. In that request, I asked that the information be provided on or before 7/20/23. At the time this inspection report was completed, copies of training records or training certificates for store associates that manage hazardous waste, universal waste, and hazardous waste pharmaceuticals has not been received.		

SECTION IV – AREA OF CONCERN

The presentation of Area(s) of Concern does not constitute a formal compliance determination or violation.

Building: Main Store Building	Area: Automotive Service	Sub-area: Basement/Pit
JJ1-OB-001		
Five-gallon container that held used oil was not labeled with the words, "Used Oil."	Regulation:	Sections:
Building: Main Store Building	Area: Automotive Service	Sub-area: Basement/Pit
JJ1-OB-002		
Tank containing approximately two-gallon of used oil was not labeled with the words "Used Oil."	Regulation:	Sections:
Building: Main Store Building	Area: Automotive Service	Sub-area: Service Bays
JJ1-OB-003		
Waste aerosol cans were not in a closed container, and they were not labeled with the words "Hazardous	Regulation:	Sections:

Waste" or a hazard indicator.		
Building: Main Store Building	Area: Automotive Service	Sub-area: Service Bays
JJ1-OB-004		
Waste aerosol can of WD-40 lubricant was in a trash receptacle. Mr. Woodard removed the waste aerosol can from the trash receptacle and placed it in the cloth hamper with the other waste aerosol cans that had been observed earlier.	Regulation:	Sections:
Building: Main Store Building	Area: Receiving Area	Sub-area: Central Accumulation Area (CAA)
JJ1-OB-005		
A box containing waste lithium batteries was not labeled with either the phrase "Universal Waste - Batteries," "Waste Batteries," or "Used Batteries."	Regulation:	Sections:
Building: Main Store Building	Area: Receiving Area	Sub-area: Central Accumulation Area (CAA)
JJ1-OB-006		
A box that was labeled with the words "Alkaline Batteries" also contained a button style (Lithium) battery and an AA, Ni-MH (Nickel Metal Hydride) battery mixed in with the alkaline batteries. The container was not labeled with either the phrase "Universal Waste - Batteries," "Waste Batteries," or "Used Batteries."	Regulation:	Sections:
Building: Main Store Building	Area: Receiving Area	Sub-area: Central Accumulation Area (CAA)
JJ1-OB-007		
I was not convinced that facility associates had a good understanding of either hazardous waste or universal waste management practices. I explained the differences between	Regulation:	Sections:

management as a hazardous waste versus universal waste and then indicated that a waste determination was required for the waste fluorescent lamps.		
Building: Main Store Building	Area: Receiving Area	Sub-area: Central Accumulation Area (CAA)
JJ1-OB-008		
A five-gallon container on the top shelf of the yellow flammable storage cabinet, being used to accumulate waste alcohol, was not marked with a hazard indicator and a five-gallon container on the bottom shelf, being used to accumulate waste heating oil, was also not marked with a hazard indicator.	Regulation:	Sections:
Building: Main Store Building	Area: Receiving Area	Sub-area:
JJ1-OB-010		
A black, five-gallon container, holding hazardous waste pharmaceuticals was marked with a hazardous waste label and the words "Pharmaceutical Hazardous Waste" were written on the label. The container was marked with the date 2/1/23. At the time of the inspection, the container was not labeled with the words "Hazardous Waste Pharmaceuticals."	Regulation:	Sections:

Record: Inspections		
JJ1-RR-001		
At the time this report was completed, the requested hazardous waste inspection logs for the last three years, covering the period from 3/9/20 through 3/9/23 were not provided.	Regulation:	Sections:
Record: Manifests		

JJ1-RR-002		
At the time this inspection report was completed, a copy of the requested disposal paperwork for the last shipment of waste fluorescent lamps that left facility #2722 has not been received.	Regulation:	Sections:
Record: Ensure Applicable Employees are Trained – SQG		
JJ1-RR-003		
At the time this inspection report was completed, copies of training records or training certificates for store associates that manage hazardous waste, universal waste, and hazardous waste pharmaceuticals has not been received.	Regulation:	Sections:

SECTION V – CLOSING CONFERENCE AND FOLLOW UP**Closing Conference**

At the conclusion of the inspection, I conducted a closing conference that was attended by those listed in the Attendees table, in Section I of this report. I thanked everyone for their time and cooperation during the inspection and began a review of the areas of concern (listed in Section III – Areas of Concern) that I observed during my inspection of the facility. I then explained the follow-up process that would take place once I finished the report. I explained they would receive a copy of the report as would a case officer. I told them the case officer would review the report to determine if any of my areas of concern resulted in determinations of violation.

Following the Inspection

On 7/6/23, I checked RCRAInfo to get the site contact information. I saw that Mr. Neil Walters, Senior EH&S Manager, was the new site contact for the facility. On 7/6/23 I sent an email to Mr. Walters. In that email, I made the following request:

"I tried calling you, but a message indicated that you were not receiving calls at this time. I conducted a routine hazardous waste compliance inspection at your #2722 facility in Fairbanks, AK back on 3/9/23. During the inspection, I asked for copies of hazardous waste manifests and weekly hazardous waste inspections logs for the last three years, covering the date range from 3/9/23 back to 3/9/20. As of today, I have still not received this information. Since the inspection, I have reviewed your facility's hazardous waste manifests on EPA's E-Manifest system in RCRAInfo and no longer need copies of them.

I do still need to get copies of the weekly inspection logs as well as some additional documentation. Would you please send me the following documentation:

- Copies of the weekly hazardous waste inspection logs for the last three years, covering the period from 3/9/23 back to 3/9/20, for facility #2722.
- A copy of the disposal paperwork for the last shipment of waste fluorescent lamps that left facility #2722.
- Copies of training records or training certificates for store associates that manage hazardous waste, universal waste, and hazardous waste pharmaceuticals. If the universal waste, and hazardous waste pharmaceuticals training is included in your facility's hazardous waste management training, please include a complete copy of your facility's hazardous waste management training module/slides for review. **(Please DO NOT include any Personal Identifiable Information (PII) in this request)** Just the name, training, and date of training.

Please provide the requested documentation on or before 7/20/23. If you have any questions about the requested documents or if you would like for me to review the areas of concern that were identified on the day of the inspection with you, please contact me at (907) 227-4316."

Mr. Walters responded on 7/6/23, stating "Hi Jon, Apologies for the missed call. Adding Jamie Huens to address the ask on our behalf. "

On 7/18/23, I received an email from Mr. Derek Warren, Senior Manager II, EH&S Compliance (Supply Chain). In the email he states, "Back on 3-9-2023 you performed an inspection of Walmart facility 2722. I wanted to confirm if all your requests have been met and if you are still waiting on any information. Could you please send me all paperwork related to this, including any reports you issued the store.

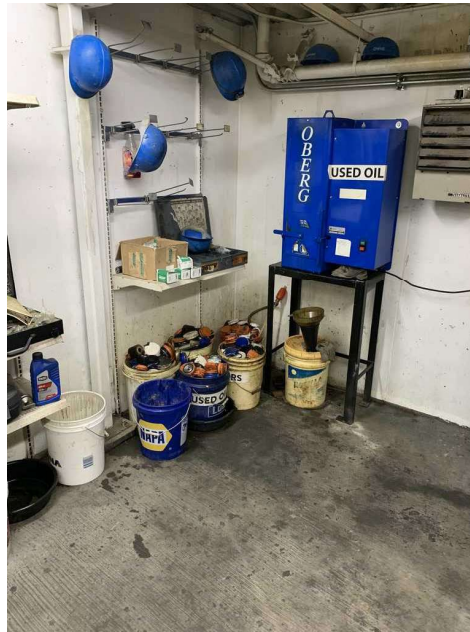
I responded to his email on 7/18/23, forwarding the email from Mr. Walters which stated, "Adding Jamie Huens to address the ask on our behalf."

At the time this report was completed, the requested hazardous waste inspection logs for the last three years, covering the period from 3/9/20 through 3/9/23 as well as the training records and disposal paperwork for waste fluorescent lamps has not been provided.

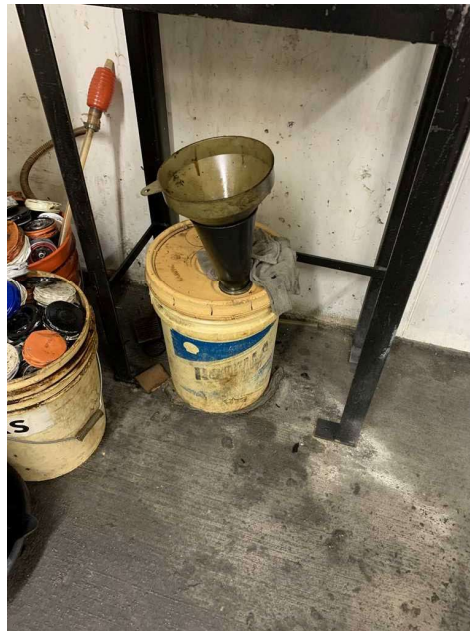
SECTION VI – SAMPLING ACTIVITIES AND ANALYTICAL RESULTS - No sampling was conducted.**SECTION VII – LIST OF APPENDICES**

1. Photo Log
2. Document Log

APPENDIX 1: PHOTO LOG



[Title]			IMG_0629.jpg
03/09/2023 08:51 AM	No CBI	No PII	Photographer: Jon Jones
Main Store Building/Automotive Service			64.85624722, -147.68691944
View of a five-gallon container beneath a used oil filter crusher that is being used to accumulate used oil. The container is not labeled with the words "Used Oil."			



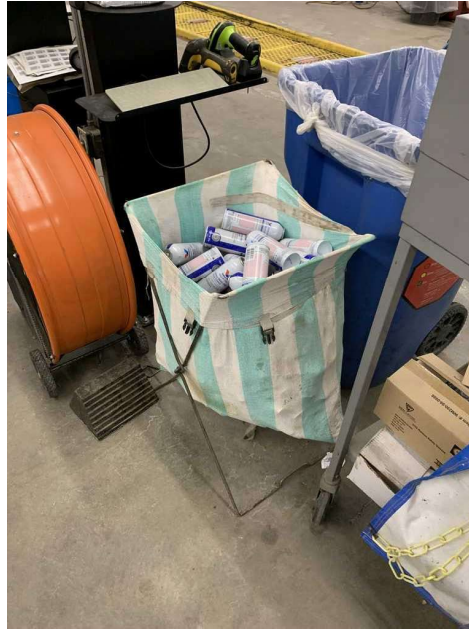
[Title]			IMG_0630.jpg
03/09/2023 08:51 AM	No CBI	No PII	Photographer: Jon Jones
Main Store Building/Automotive Service			64.85625555, -147.68710277
Close-up view of the same five-gallon container seen in photo IMG_0629.jpg, showing that it is not labeled with the words "Used Oil."			



[Title]			IMG_0631.jpg
03/09/2023 08:53 AM	No CBI	No PII	Photographer: Jon Jones
Main Store Building/Automotive Service			64.85624722, -147.68647777
View of a ~50-gallon used oil storage tank that is attached to a hydraulic used oil filter crusher. The tank is not labeled with the words "Used Oil."			



[Title]			IMG_0632.jpg
03/09/2023 08:53 AM	No CBI	No PII	Photographer: Jon Jones
Main Store Building/Automotive Service			64.85625555, -147.68672222
View of the site glass on the tank seen in photo IMG_0631, showing that the tank contains approximately 2 gallons of used oil.			



[Title]			IMG_0633.jpg
03/09/2023 09:07 AM	No CBI	No PII	Photographer: Jon Jones
Main Store Building/Automotive Service			64.85628611, -147.68740833
View of a laundry hamper that is being used to accumulate waste aerosol cans. This view shows that the hamper is not labeled with the words "Hazardous Waste" or a hazard indicator. The hamper is also not closed.			



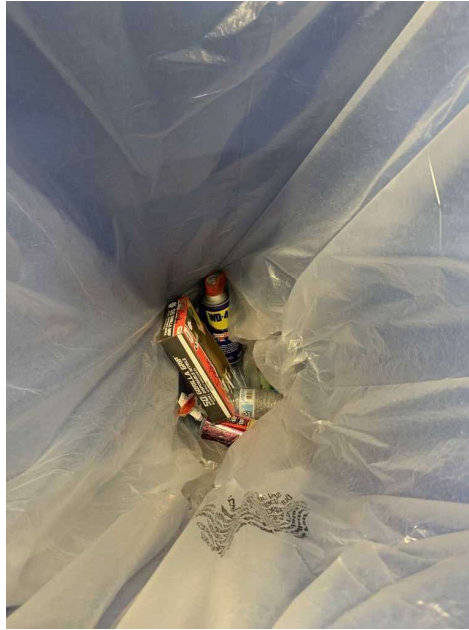
[Title]			IMG_0634.jpg
03/09/2023 09:07 AM	No CBI	No PII	Photographer: Jon Jones
Main Store Building/Automotive Service			64.85629166, -147.68736388
View of the waste aerosol cans in the laundry hamper.			



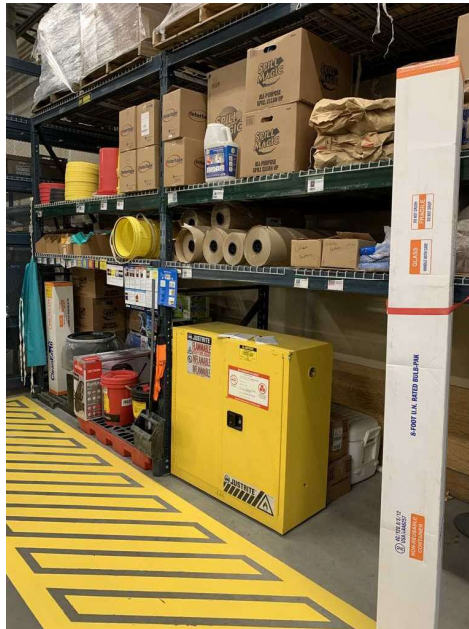
[Title]			IMG_0635.jpg
03/09/2023 09:07 AM	No CBI	No PII	Photographer: Jon Jones
Main Store Building/Automotive Service			64.85636944, -147.68745555
Another view of the hamper being used to accumulate waste aerosol cans, showing that it is not closed and labeled with the words "Hazardous Waste" or a hazard indicator.			



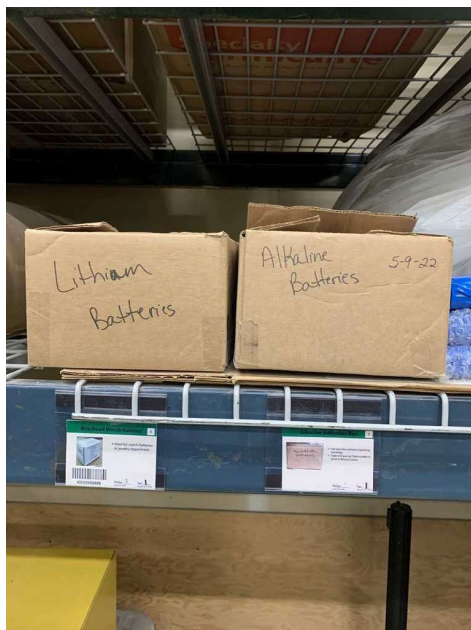
[Title]			IMG_0638.jpg
03/09/2023 09:12 AM	No CBI	No PII	Photographer: Jon Jones
Main Store Building/Automotive Service			64.85633055, -147.68748611
View of one of the waste aerosol cans that was being accumulated in the laundry hamper.			



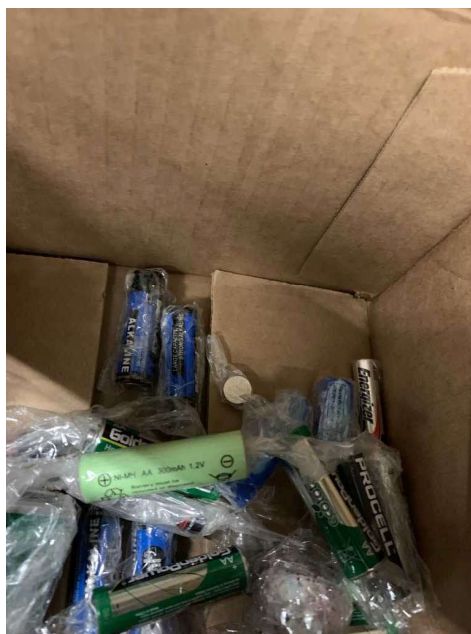
[Title]			IMG_0639.jpg
03/09/2023 09:13 AM	No CBI	No PII	Photographer: Jon Jones
Main Store Building/Automotive Service			64.85631666, -147.68743888
View of a waste aerosol can in a trash receptacle that held WD-40.			



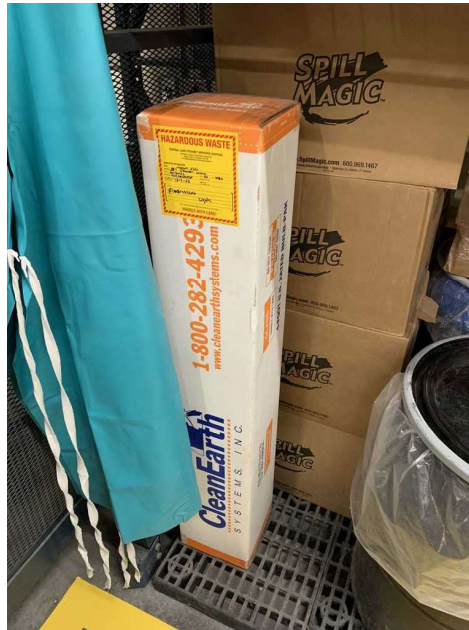
[Title]			IMG_0640.jpg
03/09/2023 09:29 AM	No CBI	No PII	Photographer: Jon Jones
Main Store Building/Receiving Area			64.85653055, -147.689025
View of the facility's CAA, Showing two cardboard boxes on the shelf above the yellow flammable storage cabinet.			



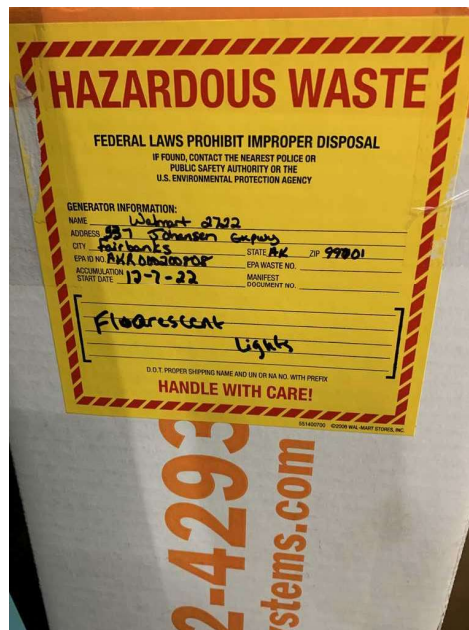
[Title]			IMG_0641.jpg
03/09/2023 09:29 AM	No CBI	No PII	Photographer: Jon Jones
Main Store Building/Receiving Area			64.85636944, -147.68890277
View of the box on the left that is marked with the words "Lithium Batteries." The box seen here is not labeled with either the phrase "Universal Waste - Batteries," "Waste Batteries," or "Used Batteries." The box of Lithium batteries is also not dated.			



[Title]			IMG_0642.jpg
03/09/2023 09:30 AM	No CBI	No PII	Photographer: Jon Jones
Main Store Building/Receiving Area			64.85665833, -147.68956111
This is a view of the inside of the box that was labeled "Alkaline Batteries" and dated 5/9/22. This view shows that there is also a green AA, Nickel-Metal Hydride battery as well as a button style battery inside the box and it is not labeled with either the phrase "Universal Waste - Batteries," "Waste Batteries," or "Used Batteries."			



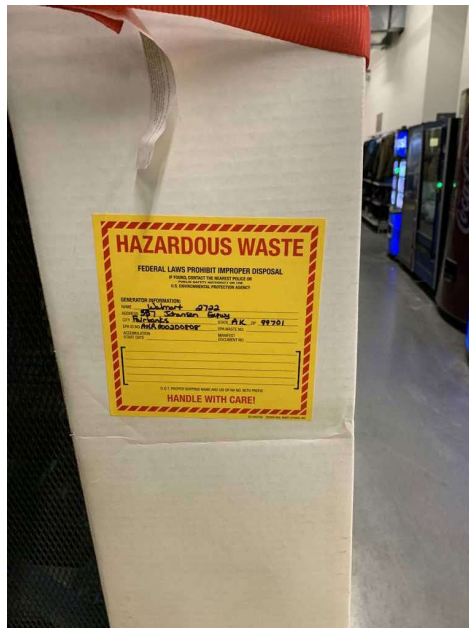
[Title]			IMG_0643.jpg
03/09/2023 09:37 AM	No CBI	No PII	Photographer: Jon Jones
Main Store Building/Receiving Area			64.85668055, -147.68975833
View of a box of four-foot waste fluorescent lamps that is labeled with the words "Hazardous Waste" as opposed to being managed as a universal waste.			



[Title]			IMG_0644.jpg
03/09/2023 09:37 AM	No CBI	No PII	Photographer: Jon Jones
Main Store Building/Receiving Area			64.85668055, -147.68975833
Close-up view of the label on the box of four-foot waste fluorescent lamps.			



[Title]			IMG_0645.jpg
03/09/2023 09:37 AM	No CBI	No PII	Photographer: Jon Jones
Main Store Building/Receiving Area			64.85658888, -147.68896388
View of the label on a box to be used to accumulate eight-foot waste fluorescent lamps. The box seen here is empty.			



[Title]			IMG_0646.jpg
03/09/2023 09:37 AM	No CBI	No PII	Photographer: Jon Jones
Main Store Building/Receiving Area			64.85658888, -147.68896388
Close-up view of the label on the box for eight-foot waste fluorescent lamps.			



[Title]			IMG_0647.jpg
03/09/2023 09:39 AM	No CBI	No PII	Photographer: Jon Jones
Main Store Building/Receiving Area			64.85673611, -147.689225
View of a black, five-gallon container seen at the back, top right of the photo that is marked with a hazardous waste label that contains the words "Pharmaceutical Hazardous Waste" instead of the words "Hazardous Waste Pharmaceuticals."			



[Title]			IMG_0650.jpg
03/09/2023 09:50 AM	No CBI	No PII	Photographer: Jon Jones
Main Store Building/Receiving Area			64.85671111, -147.68946944
View of waste containers seen here inside of the yellow, flammable storage cabinet.			



[Title]			IMG_0651.jpg
03/09/2023 09:50 AM	No CBI	No PII	Photographer: Jon Jones
Main Store Building/Receiving Area			64.85661388, -147.6888888
View of a waste container holding Waste alcohol that is not marked with a hazard indicator.			



[Title]			IMG_0652.jpg
03/09/2023 09:50 AM	No CBI	No PII	Photographer: Jon Jones
Main Store Building/Receiving Area			64.85658888, -147.68871944
View of a waste container holding waste heating fuel that is not marked with a hazard indicator.			



[Title]			IMG_0653.jpg
03/09/2023 09:54 AM	No CBI	No PII	Photographer: Jon Jones
Main Store Building/Receiving Area			64.85644444, -147.68893333
View of the containers after being marked with the hazard indicator.			



[Title]			IMG_0654.jpg
03/09/2023 09:54 AM	No CBI	No PII	Photographer: Jon Jones
Main Store Building/Receiving Area			64.85644444, -147.68893333
View of the containers after being marked with the hazard indicator.			



[Title]			IMG_0655.jpg
03/09/2023 10:01 AM	No CBI	No PII	Photographer: Jon Jones
Main Store Building/Receiving Area			64.85656111, -147.68917777
View of the four-foot waste lamp container after facility associates added the word "TOXIC" for a hazard indicator.			

APPENDIX 2: DOCUMENT LOG

Document Type	Document Name	Contains CBI	Contains PII	Uploaded By	Date Received
Communications	Email from Andrew Mierek 3.24.23.msg	No	No	Jon Jones	07/21/2023
Communications	Email to Neil Walters 7.6.23.msg	No	No	Jon Jones	07/21/2023
Communications	Email from Neil Walters 7.6.23.msg	No	No	Jon Jones	07/21/2023
Communications	Email from Derek Warren 7.18.23.msg	No	No	Jon Jones	07/21/2023
Communications	Email to Andrew Mierek 3.24.23.msg	No	No	Jon Jones	07/21/2023
Communications	Email to Derek Warren 7.18.23.msg	No	No	Jon Jones	07/21/2023