

REGION 10 Enforcement Division

INSPECTION REPORT

Inspection Date(s):	01/19/2022 - 01/19/2022		Announced: No
Time:	Entry: 09:52 AM (AKT)		Exit: 01:38 PM (AKT)
Program:	RCRA		
Regulatory Program(s):	Title 40 - ENVIRONMENTAL PROTECTION AGENCY		
If Access is Denied:			
Company Name:	Ravn Alaska		
Facility or Site Name:	Ravn Alaska		
Facility/Site Physical Address:	4700 W Old International Airport Rd		
(City, state, zip code)	Anchorage, AK 99502		
Type of Operation:	Cargo and Passenger aircraft facility		
Size of Facility:	50,680+/- square feet		
Length of Facility at Location:	Since 2010/2011		
Geographic Coordinates:	61.176582, -149.970907		
Mailing address: (Secondary Address)	Mr. Tony Santiago, Director of Safety 4700 W Old International Airport Rd Anchorage, AK 99502 tony.santiago@ravnalaska.com		
(City, state, zip code)	Anchorage, AK 99502		
County:			
Facility/Site Identifier:	AKW000000288		
Media Number:	N/A		
NAICS:	481111 - SCHEDULED PASSENGER AIR TRANSPORTATION		
Lead Inspector:			
Jon Jones			
	REGION 10	Jones.Jon@epa.gov	(907) 271-6329
Supervisor Review:			
Jen Sullivan			
	REGION 10	Sullivan.Jennifer.A@epa.gov	(206) 553-6978

SECTION I – INTRODUCTION**Purpose of the Inspection/Objective**

Type of inspection: CEI - Compliance Evaluation Inspection

This was a Resource Conservation and Recovery Act (RCRA) inspection. 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 2022.

Attendees

Title	Name	Phone	Email	Present in Opening Conf.	Present in Closing Conf.
Lead Inspector	Jon Jones	(907) 271-6329	Jones.Jon@epa.gov	Yes	Yes
Director of Safety	Tony Santiago	(907) 744-7751	tony.santiago@ravnalaska.com	Yes	Yes
Cargo Agent	Trey Dock	(907) 444-3036	trey.dock@gmail.com	Yes	No

Opening Conference

EPA Lead Inspector Jon Jones arrived at the Ravn Alaska at 09:52 AM (AKT) on 01/19/2022 for an inspection. I presented my credentials to Mr. Trey Dock shortly after arriving at the facility and Mr. Tony Santiago shortly after entering the facility's Hangar and informed him that this was an EPA RCRA inspection. The table above presents all the inspection participants.

When I arrived at the facility, I met with the receptionist at the front desk and announced my intention to conduct a RCRA compliance inspection at the facility. The receptionist asked me who I needed to see, and I told her that the point-of-contact (POC) I had for the facility was Chris Wallstrum, Director of Ground Safety – HSE. I told the receptionist that Chris Wallstrum was the POC in 2014 and may or may not be the current POC. The receptionist had me sign the visitor log. The receptionist contacted someone over the phone and then asked if I could come back some other time. I told her that The RCRA program conducts unannounced inspections and that if the current POC was unavailable, I would need to see their alternate. When I arrived, it was snowing heavily, and I parked near the front door. I asked her if I had parked in an appropriate location, and she directed me to park in a visitor parking spot. She pointed to where the visitor parking was located and while she tried to contact someone to assist me, I re-parked my vehicle.

I returned to the reception/waiting area and the receptionist gave me a visitor badge and told me that someone would be with me shortly. I asked who my contact person was, and she said Herschel. I later met Mr. Herschel Acton, Ground Support Equipment Facility Manager, while inspecting the Ground Support Equipment (GSE) shop. I waited for approximately 10 minutes and a couple of gentlemen walked through the waiting area and one told the other to assist me and I overheard Mr. Acton say that he would be in the Hangar if he needed him. The gentleman I met with introduced himself to me as Mr. Trey Dock, Cargo Agent. I asked him if there was some place we could go and hold an opening conference. Mr. Dock led me upstairs and we went and sat down at a small table in a hallway. I began asking Mr. Dock some basic questions regarding the facility and soon realized that Mr. Dock was not qualified to answer my questions due to him being a new employee. According to Mr. Dock, he had been with Ravn Alaska, as a Cargo Agent, for approximately 3 months. I told Mr. Dock that

we could go look at the cargo area and then we could head over to the Hangar. There were no observations to be made in the cargo area, so we headed over to the Hangar. I told Mr. Dock that we needed to find someone that knew more about the operations of the facility.

We entered the Hangar together and we walked toward some offices. Mr. Dock had me wait outside the offices while he went to get someone that knew more about the operations of the facility. Mr. Dock returned with a gentleman who introduced himself as Mr. Bob Torrey, Director of Maintenance. Mr. Torrey told me that I shouldn't be wandering around the facility unescorted. Another gentleman arrived and introduced himself as Mr. Tony Santiago, Director of Safety. I explained to both gentlemen that I was not unescorted, and that Mr. Dock was the escort provided to me when I arrived. I explained to Messrs. Torrey and Santiago that Mr. Dock, being a Cargo Agent and having only been employed for 3 months, was not knowledgeable enough about the operations and I had asked him to find someone who was better suited to answer questions about the facility operations. Mr. Santiago said that he could assist with the inspection, and I suggested that we go somewhere to conduct an opening conference. I thanked Mr. Dock for his time. Mr. Santiago and I went to an upstairs conference room for an opening conference. During the opening conference, Mr. Santiago provided the following information about Ravn Alaska:

In March 2020 COVID started. Passenger rates declined and in April 2020 Ravn Alaska, owned by Corvus Airlines, decided to call it quits. Ravn Alaska filed chapter 11 bankruptcy to reorganize and then decided to do Chapter 7 bankruptcy. In July 2020, Float Alaska purchased Ravn Alaska and brought the business back.

During the shut-down a skeleton crew of mechanics and personnel were kept onsite to continue to maintain aircraft.

Ravn Alaska slowly started bringing employees back, conducting Test flights at the end of September 2020, charter flights in October 2020, and then back in business by November 2020.

In 2021, Ravn Alaska's parent company announced plans to launch Northern Pacific Airways, a new airline that would fly passengers between North America and Asia via a stopover at Ted Stevens Anchorage International Airport. The new airline is planned to commence operations in 2022.

Facility/Site Description

Ravn Alaska is an airline operating domestic flights within the state of Alaska. Additional information about the company can be found at: <https://www.ravnalaska.com>.

Facility Info

Weather Conditions	Cold and snowing
Number of employees	95+
Operating Hours	Administrative offices, 8:00 a.m. to 5:00 p.m. Monday through Friday. The Hangar is open 24 hours a day, 7 days a week with two shifts.
Safety Training Provided to Inspector(s)?	No
What type of generator facility notified?	Very Small Quantity Generator (VSQG)

What type of generator facility verified as?	Very Small Quantity Generator (VSQG)
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Process Description

According to Mr. Santiago, aircraft is routinely maintained at the facility and wastes generated at the facility include:

- Waste fluorescent lamps from aircraft
- Used oil
- Waste aerosols
- Parts washer solvent

During the inspection of the facility on January 19, 2022, I was accompanied by Mr. Trey Dock, Cargo Agent, while inspecting the Cargo Building and Mr. Tony Santiago, Director of Safety while inspecting the Hangar and Ground Support Equipment (GSE) Shop.

During the inspection I looked at the facility's processes, in addition to hazardous waste management practices, generation points, and accumulation areas. I looked for wastes that facility representatives had not yet identified or designated as hazardous. I also observed the facility's universal waste and used oil management.

Building(s)

Building/Area/Sub-area	Process Description	Area of Concern
Cargo Building	No waste generation.	No
GSE Shop	Maintenance of GSE.	No
Hangar	Aircraft maintenance.	Yes
Hazardous Waste Storage Area	Accumulation area for used oil, waste aerosols and waste Jet A fuel.	Yes
Maintenance Control Center	Accumulation area for universal waste lamps.	Yes

SECTION II – OBSERVATIONS AND RECORDS REVIEW

Observations

Building: Hangar	Contains CBI: No
Observation #: JJ1-OB-004	Date: 01/19/2022
While in the Hangar, I inspected the contents of several flammable storage cabinets. During my inspection of the flammable storage cabinets, I saw a product container of Methyl Ethyl Ketone (MEK). I asked Mr. Santiago about the facility's use of MEK, and he said he wasn't sure about how it was used. I asked Mr. Santiago if we could ask someone who was familiar with its use. There was a gentleman in the Hangar that Mr. Santiago stopped to ask about the MEK. Mr. Santiago introduced the gentleman as Justin Bennett, Chief Inspector. According to Mr. Bennett, MEK is used for cleaning of aircraft parts and used to activate/reactivate certain adhesives. Mr. Bennett said that the blue paper wipes are used with the MEK and then disposed of into the	

trash. He also said that just because you might find a blue paper wipe in the trash doesn't necessarily mean it was contaminated with MEK.

I explained to Mr. Santiago, those wipes contaminated with MEK used in the way described by Mr. Bennett, were likely F-listed (F005) hazardous waste. Because F005 waste is listed due to its toxicity, I told him that if it's mixed with other wastes, such as other solid wastes in the trash receptacles, due to the Mixture Rule, all the waste would become F-listed hazardous waste. I also told him that the wipes may be able to be managed under the Solvent-Contaminated Wipes Rule, provided certain management standards were met.

Following the inspection, I sent two emails to Mr. Santiago on January 20, 2022. One providing him with an attached Small Business Information Sheet and an attached Used Oil and Hazardous Waste Management guide for Auto and Aircraft Repair Shops in Alaska. I also sent another, asking him if the solvent (MEK) was applied to the part/aircraft for cleaning and then wiped off, applied to the wipe and then the part/aircraft is cleaned with the wipe, or if it was a combination of both? Mr. Santiago responded by email, the same day, stating that it was a combination of both.

After receiving Mr. Santiago's response, I followed up with an email in which I provided him with a RCRA McCoy "White Paper" - Solvent-Contaminated Wipes Final Rule, covering the topic of wipes and the wipes exclusion.

The following day, January 21, 2022, I received an email from Mr. Santiago in which he stated: "See attached for photo evidence of corrective actions as well as the signed copy of the manifest. Please let me know if you need anything else." In the attached photos, there was a photo of a step-can with a label that read, "Exclusion Solvent Contaminated Wipes."

I responded to Mr. Santiago with an email dated January 25, 2022, in which I stated:

"I want to point out the following items in your response that I found to be either missing or incomplete:

The wipes guidance document that I sent to you states that containers are required to be labeled with the words, "Excluded Solvent-Contaminated Wipes." Your label is marked "Exclusion" vs "Excluded." There is additional information in the document regarding the lid of the container, so you'll want to be sure the container lid meets those requirements as well. Please send photos of these changes at your earliest convenience. Let me know if you have any questions."

To date, there has been no response from Mr. Santiago or the facility.

Photo(s)

1. [IMG-202201191307207201123174.jpg](#)
2. [IMG-202201191315111511780165.jpg](#)
3. [IMG-202201191316241624666618.jpg](#)

Building: Hangar/Hazardous Waste Storage Area

Contains CBI: No

Observation #: JJ1-OB-002

Date: 01/19/2022

I asked Mr. Santiago to show me where they were accumulating used oil. We got to an area of the hangar, on the SE corner, where the facility had four 55-gallon containers that were on a spill pallet. Three of the four containers were labeled.

One 55-gallon container was labeled "Waste Jet A" fuel, one 55-gallon container was labeled "Used Skydrol," which Mr. Santiago said was hydraulic fluid, and one 55-gallon container was labeled as "Used Oil." According to Mr. Santiago, the unlabeled 55-gallon container also held used oil.

The 55-gallon container of used hydraulic fluid (Skydrol) was not labeled with the words used oil.

One of the two 55-gallon containers of used oil was labeled "Waste oil," not used oil as Mr. Santiago first said, and the other 55-gallon container was not labeled at all.

During the inspection, Mr. Santiago explained that Ravn Alaska's Facilities Technician, Mr. Rob Stenehjem, usually manages the waste at the facility but at the time of the inspection he said Mr. Stenehjem was working at another Ravn Alaska facility. Mr. Santiago contacted Mr. Stenehjem several times throughout the inspection for assistance in answering questions.

At the time of the inspection, the container of waste jet A fuel was not labeled with the words "Hazardous Waste," or a hazard indicator and the container was open. According to Mr. Stenehjem, the waste jet A fuel is generated when small amounts of fuel are tested for quality assurance prior to being used in the aircraft and a 55-gallon container of the waste Jet A fuel is generated approximately every 3 months.

I also saw a small one-gallon bucket that according to Mr. Santiago, held used oil. At the time of the inspection the bucket was not labeled with the words "Used Oil."

On January 21, 2022, I received an email from Mr. Santiago in which he stated: "See attached for photo evidence of corrective actions as well as the signed copy of the manifest. Please let me know if you need anything else."

I responded to Mr. Santiago with an email dated January 25, 2022, in which I stated:

"I want to point out the following items in your response that I found to be either missing or incomplete:

The 55-gallon container of hydraulic fluid (Skydrol) should have also been labeled with the words "Used Oil" but there was no picture to indicate that it had been labeled. Please send photos of these changes at your earliest convenience. Let me know if you have any questions."

I called Mr. Santiago on February 9, 2022, to follow-up on the missing/incomplete information as well as to request a Safety Data Sheet (SDS) for the Jet A fuel. I did not reach Mr. Santiago but left a voicemail message asking him to return my call. To date, there has been no response from Mr. Santiago or the facility.

Photo(s)

1. [IMG-202201191219151915932325.jpg](#)
2. [IMG-202201191219281928803405.jpg](#)
3. [IMG-202201191219541954697054.jpg](#)
4. [IMG-202201191222342234891534.jpg](#)
5. [IMG-202201191222452245531117.jpg](#)
6. [IMG-202201191226172617811768.jpg](#)
7. [IMG-202201191226252625497914.jpg](#)
8. [IMG-202201191226342634824978.jpg](#)
9. [IMG-2022011912371237121026195.jpg](#)
10. [IMG-202201191237223722939657.jpg](#)
11. [IMG-202201191237443744975060.jpg](#)

Building: Hangar/Hazardous Waste Storage Area

Contains CBI: No

Observation #: JJ1-OB-003

Date: 01/19/2022

Adjacent to the hazardous waste storage area, I saw a 55-gallon container. The lid was stenciled with the words, "Empty Aerosol Cans Only." Mr. Santiago opened the container and I saw it was full of waste aerosol cans. According to Mr. Stenehjerm, the aerosol cans are not punctured, and they are managed for disposal through Environmental Compliance Consultants (ECC). At the time of the inspection, there was no indication from Messrs. Santiago and Stenehjerm, or any markings on the container that would suggest how the waste aerosols were being managed other than a "Non-Regulated" label on the container lid and disposal was through ECC. I reached into the container and pulled out several waste aerosols to shake them and see if they still contained any liquids. I could both hear and feel liquids sloshing around inside a few of the waste aerosol cans as I shook them.

Photo(s)

1. [IMG-2022011912503450341096930.jpg](#)
2. [IMG-202201191250455045951399.jpg](#)
3. [IMG-2022011912505550551134397.jpg](#)

Building: Hangar/Maintenance Control Center**Contains CBI:** No**Observation #:** JJ1-OB-001**Date:** 01/19/2022

While waiting for someone that was familiar with the Hangar operations, I saw an unlabeled fiberboard container, commonly used to hold waste fluorescent lamps. I lifted the lid on the container and saw that it held, what appeared to be 40+ waste fluorescent lamps. Several of the lamps had darkened or burnt looking ends, indicative of waste fluorescent lamps. At the time of the inspection, the fiberboard container was not labeled as Universal Waste.

I was met by Mr. Bob Torrey, Director of Maintenance. Mr. Torrey said the lamps are generated very infrequently and it might take a year or two to fill the container.

Mr. Santiago called Mr. Stenehjerm and asked how long the lamps had been stored and Mr. Stenehjerm told Mr. Santiago they have been in accumulation since September 2021. Mr. Stenehjerm told Mr. Santiago the lamps are disposed of at the Household Hazardous Waste (HHW) facility at the local Anchorage landfill.

I told Mr. Santiago that waste fluorescent lamps were typically managed as a universal waste and that they couldn't be accumulated for more than a year. I told Mr. Santiago that I would send him an electronic version of a guidebook that was developed for Auto and Aircraft Repair Shops in Alaska which addressed used oil and hazardous waste management. I told him that it also covered universal waste management.

Following the inspection, I sent an email to Mr. Santiago on January 20, 2022, providing him with an attached Small Business Information Sheet and an attached Used Oil and Hazardous Waste Management Guide for Auto and Aircraft Repair Shops in Alaska.

The following day, January 21, 2022, I received an email from Mr. Santiago in which he stated: "See attached for photo evidence of corrective actions as well as the signed copy of the manifest. Please let me know if you need anything else."

I responded to Mr. Santiago with an email dated January 25, 2022, in which I stated:

"I want to point out the following items in your response that I found to be either missing or incomplete:

The guidebook I sent to you states that universal waste lamps should be labeled with the words "Universal Waste – Lamps." Your label isn't marked with the word "Lamps" in its description. If you so choose, they can also be labeled with the words "Waste Lamps" or "Used Lamps." Your choice.

Please send photos of these changes at your earliest convenience. Let me know if you have any questions.”

I called Mr. Santiago on February 9, 2022, to follow-up on the missing/incomplete information as well as to request a Safety Data Sheet (SDS) for the Jet A fuel. I did not reach Mr. Santiago but left a voicemail message asking him to return my call. To date, there has been no response from Mr. Santiago or the facility.

Photo(s)

1. [IMG-202201191053445344720850.jpg](#)
2. [IMG-202201191053575357784900.jpg](#)
3. [IMG-202201191054215421519277.jpg](#)

Records Review

SECTION III – AREAS OF CONCERN

The presentation of areas of concern does not constitute a formal compliance determination or violation.

Building: Hangar	Area: Maintenance Control Center	Sub-area:
JJ1-OB-001		
A fiberboard container of waste lamps managed as universal waste was not labeled as Universal Waste.	Citations: 273.14(e)	Sections:
Building: Hangar	Area: HW storage area	Sub-area:
JJ1-OB-002		
A 55-gallon container of used Skydrol hydraulic fluid, managed as used oil, was not labeled with the words used oil.	Citations: 279.22(c)(1)	Sections:
Two 55-gallon containers of used oil were not labeled with the words “Used Oil” Following the inspection, Mr. Santiago provided photo documentation that the two 55-gallon containers were labeled with the words “Used Oil.”	Citations: 279.22(c)(1)	Sections:
One one-gallon bucket that held used oil was not labeled with the words “Used Oil.”	Citations: 279.22(c)(1)	Sections:

Following the inspection, Mr. Santiago provided photo documentation that the one-gallon bucket was labeled with the words "Used Oil."		
JJ1-OB-003		
One 55-gallon container labeled as "Empty Aerosol Cans Only." was observed during the inspection full of waste aerosol cans. there was no indication how the waste aerosols were managed.	Citations:	Sections:
Building: Hangar	Area:	Sub-area:
JJ1-OB-004		
Waste Wipes, some of which are contaminated with Methyl Ethyl Ketone (MEK), were observed during the inspection in the trash.	Citations:	Sections:

SECTION IV – FOLLOW UP

I observed no follow up at the time of the inspection.

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 Mr. Santiago for his 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 he 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 documented violations.

SECTION V – SAMPLING ACTIVITIES AND ANALYTICAL RESULTS - No sampling was conducted.

SECTION VI – LIST OF APPENDICES

Photo Log

[Title]	
IMG-202201191307207201123174.jpg	
01/19/2022 01:07 PM (AKT)	
Jon Jones	
GSE Shop	
No CBI	
No PII	
View of the Blue shop wipes used at the facility. According to Mr. Bennett, MEK is used for cleaning of aircraft parts and to reactivate certain adhesives. Mr. Bennett said that the blue paper wipes are used with the MEK and then disposed of into the trash. He also said that just because you might find a blue paper wipe in the trash doesn't necessarily mean it was contaminated with MEK.	

[Title]	
IMG-202201191315111511780165.jpg	
01/19/2022 01:15 PM (AKT)	
Jon Jones	
Hangar	
No CBI	
No PII	
View of a blue wipe in a trash can. According to Mr. Bennett, MEK is used for cleaning of aircraft parts and to certain adhesives. Mr. Bennett said that the blue paper wipes are used with the MEK and then disposed of into the trash. He also said that just because you might find a blue paper wipe in the trash doesn't necessarily mean it was contaminated with MEK.	

[Title]	
IMG-202201191316241624666618.jpg	
01/19/2022 01:16 PM (AKT)	
Jon Jones	
Hangar	
No CBI	
No PII	
Close-up view of the same blue wipe in a trash can. According to Mr. Bennett, MEK is used for cleaning of aircraft parts and to certain adhesives. Mr. Bennett said that the blue paper wipes are used with the MEK and then disposed of into the trash. He also said that just because you might find a blue paper wipe in the trash doesn't necessarily mean it was contaminated with MEK.	

[Title]

IMG-202201191219151915932325.jpg

01/19/2022 12:19 PM (AKT)

Jon Jones

Hangar/Hazardous Waste Storage Area

No CBI

No PII

I asked Mr. Santiago to show me where they were accumulating used oil. We got to an area of the hangar, on the SE corner, where the facility had four 55-gallon containers that were on a spill pallet. Three of the four containers were labeled.

One 55-gallon container was labeled "Waste Jet A", one 55-gallon container was labeled "Used Skydrol", which Mr. Santiago said was hydraulic fluid, and one 55-gallon container was labeled as "Used Oil." According to Mr. Santiago, the unlabeled 55-gallon container also held used oil.

At the time of the inspection, the container of waste jet A was not labeled with the words "Hazardous Waste," or a hazard indicator and the container was open.



[Title]

IMG-202201191219281928803405.jpg

01/19/2022 12:19 PM (AKT)

Jon Jones

Hangar/Hazardous Waste Storage Area

No CBI

No PII

I asked Mr. Santiago to show me where they were accumulating used oil. We got to an area of the hangar, on the SE corner, where the facility had four 55-gallon containers that were on a spill pallet. Three of the four containers were labeled.

One 55-gallon container was labeled "Waste Jet A", one 55-gallon container was labeled "Used Skydrol", which Mr. Santiago said was hydraulic fluid, and one 55-gallon container was labeled as "Used Oil." According to Mr. Santiago, the unlabeled 55-gallon container also held used oil.

At the time of the inspection, the container of waste jet A was not labeled with the words "Hazardous Waste," or a hazard indicator and the container was open.



[Title]

IMG-202201191219541954697054.jpg

01/19/2022 12:19 PM (AKT)

Jon Jones

Hangar/Hazardous Waste Storage Area

No CBI

No PII

I asked Mr. Santiago to show me where they were accumulating used oil. We got to an area of the hangar, on the SE corner, where the facility had four 55-gallon containers that were on a spill pallet. Three of the four containers were labeled.

One 55-gallon container was labeled "Waste Jet A", one 55-gallon container was labeled "Used Skydrol", which Mr. Santiago said was hydraulic fluid, and one 55-gallon container was labeled as "Used Oil." According to Mr. Santiago, the unlabeled 55-gallon container also held used oil.

At the time of the inspection, the container of waste jet A was not labeled with the words "Hazardous Waste," or a hazard indicator and the container was open.

[Title]

IMG-202201191222342234891534.jpg

01/19/2022 12:22 PM (AKT)

Jon Jones

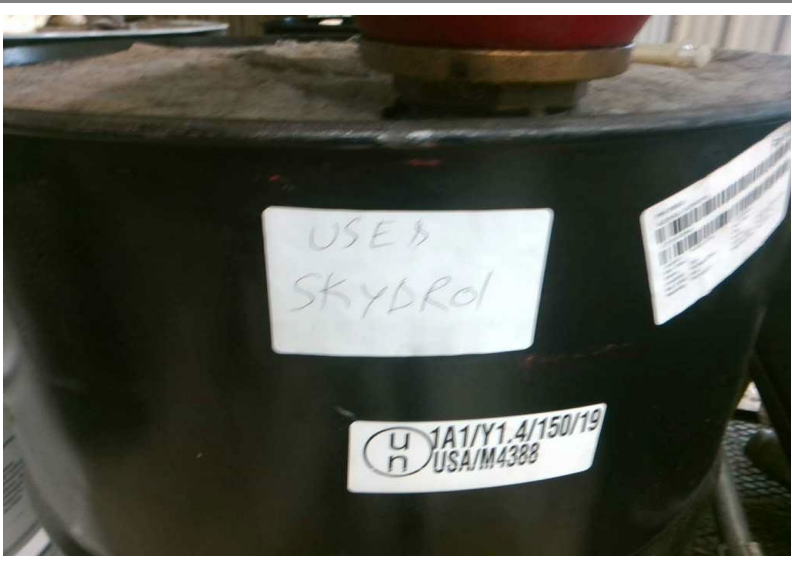
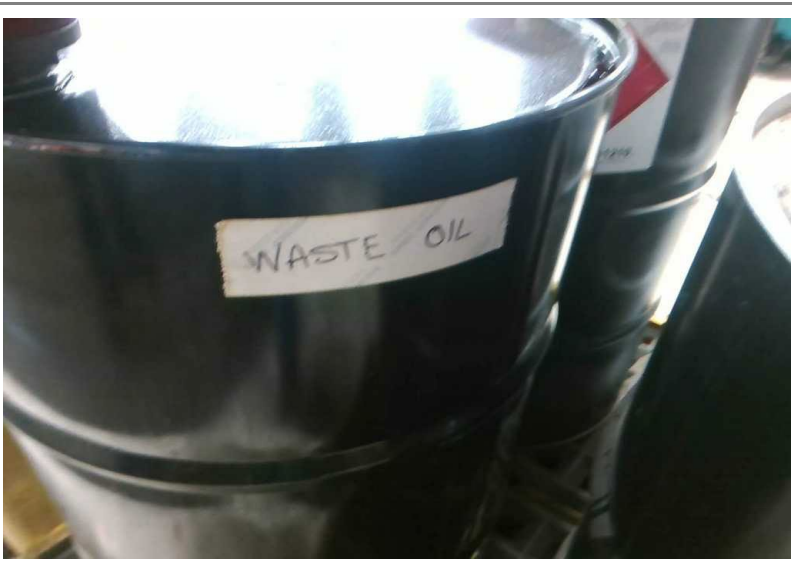
Hangar/Hazardous Waste Storage Area

No CBI

No PII

The 55-gallon container of used hydraulic fluid (Skydrol) was not labeled with the words used oil.



[Title] IMG-202201191222452245531117.jpg 01/19/2022 12:22 PM (AKT) Jon Jones Hangar/Hazardous Waste Storage Area No CBI No PII The 55-gallon container of used hydraulic fluid (Skydrol) was not labeled with the words used oil.	
[Title] IMG-202201191226172617811768.jpg 01/19/2022 12:26 PM (AKT) Jon Jones Hangar/ Hazardous Waste Storage Area No CBI No PII One of the two 55-gallon containers of used oil was labeled "Waste oil," not used oil as Mr. Santiago first said, and the other was not labeled at all.	
[Title] IMG-202201191226252625497914.jpg 01/19/2022 12:26 PM (AKT) Jon Jones Hangar/ Hazardous Waste Storage Area No CBI No PII One of the two 55-gallon containers of used oil was labeled "Waste oil," not used oil as Mr. Santiago first said, and the other was not labeled at all.	

[Title]
IMG-202201191226342634824978.jpg
01/19/2022 12:26 PM (AKT)
Jon Jones
Hangar/ Hazardous Waste Storage Area
No CBI
No PII
One of the two 55-gallon containers of used oil was labeled "Waste oil," not used oil as Mr. Santiago first said, and the other was not labeled at all.

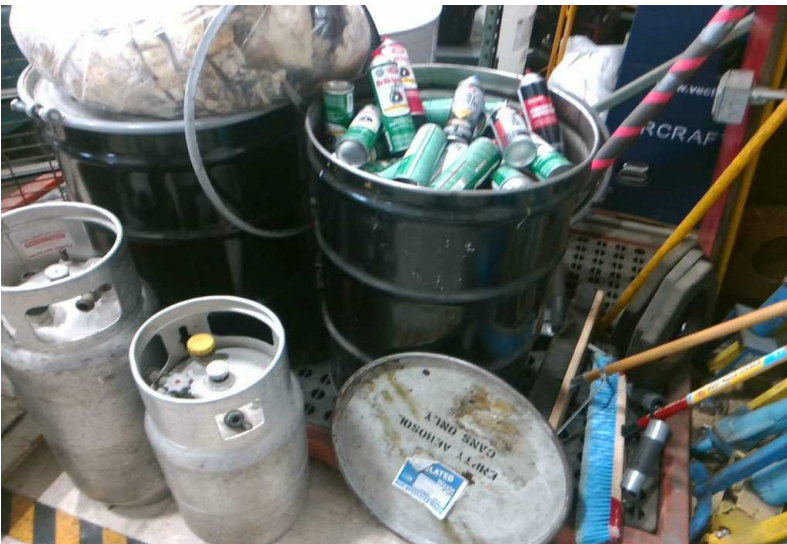


[Title]
IMG-2022011912371237121026195.jpg
01/19/2022 12:37 PM (AKT)
Jon Jones
Hangar/ Hazardous Waste Storage Area
No CBI
No PII
I also saw a small one-gallon bucket that according to Mr. Santiago, held used oil. At the time of the inspection the bucket was not labeled with the words "Used Oil."



[Title]
IMG-202201191237223722939657.jpg
01/19/2022 12:37 PM (AKT)
Jon Jones
Hangar/ Hazardous Waste Storage Area
No CBI
No PII
I also saw a small one-gallon bucket that according to Mr. Santiago, held used oil. At the time of the inspection the bucket was not labeled with the words "Used Oil."



[Title] IMG-202201191237443744975060.jpg 01/19/2022 12:37 PM (AKT) Jon Jones Hangar/ Hazardous Waste Storage Area No CBI No PII I also saw a small one-gallon bucket that according to Mr. Santiago, held used oil. At the time of the inspection the bucket was not labeled with the words "Used Oil."	
[Title] IMG-2022011912503450341096930.jpg 01/19/2022 12:50 PM (AKT) Jon Jones Hangar/ Hazardous Waste Storage Area No CBI No PII Adjacent to the HW storage area, I saw a 55-gallon container. The lid was stenciled with the words "Empty Aerosol Cans Only." Mr. Santiago opened the container, and it was full of waste aerosol cans. According to Mr. Stenehjem, the aerosol cans are not punctured, and they are managed for disposal through Environmental Compliance Consultants (ECC).	

[Title]	
IMG-202201191250455045951399.jpg	
01/19/2022 12:50 PM (AKT)	
Jon Jones	
Hangar/ Hazardous Waste Storage Area	
No CBI	
No PII	
Adjacent to the HW storage area, I saw a 55-gallon container. The lid was stenciled with the words "Empty Aerosol Cans Only." Mr. Santiago opened the container, and it was full of waste aerosol cans. According to Mr. Stenehjem, the aerosol cans are not punctured, and they are managed for disposal through Environmental Compliance Consultants (ECC).	
[Title]	
IMG-2022011912505550551134397.jpg	
01/19/2022 12:50 PM (AKT)	
Jon Jones	
Hangar/ Hazardous Waste Storage Area	
No CBI	
No PII	
Adjacent to the HW storage area, I saw a 55-gallon container. The lid was stenciled with the words "Empty Aerosol Cans Only." Mr. Santiago opened the container, and it was full of waste aerosol cans. According to Mr. Stenehjem, the aerosol cans are not punctured, and they are managed for disposal through Environmental Compliance Consultants (ECC).	



[Title]

IMG-202201191053445344720850.jpg

01/19/2022 10:53 AM (AKT)

Jon Jones

Hangar/Maintenance Control Center

No CBI

No PII

While waiting for someone that was familiar with the Hangar operations, I saw an unlabeled fiberboard container, like those used to hold waste fluorescent lamps. I lifted the lid on the container and saw that it held, what appeared to be 40+ waste fluorescent lamps. Several of the lamps had darkened or burnt looking ends, indicative of waste fluorescent lamps. At the time of the inspection, the fiberboard container was not labeled as Universal Waste.



[Title]

IMG-202201191053575357784900.jpg

01/19/2022 10:53 AM (AKT)

Jon Jones

Hangar/Maintenance Control Center

No CBI

No PII

While waiting for someone that was familiar with the Hangar operations, I saw an unlabeled fiberboard container, like those used to hold waste fluorescent lamps. I lifted the lid on the container and saw that it held, what appeared to be 40+ waste fluorescent lamps. Several of the lamps had darkened or burnt looking ends, indicative of waste fluorescent lamps. At the time of the inspection, the fiberboard container was not labeled as Universal Waste.



[Title]	
IMG-202201191054215421519277.jpg	
01/19/2022 10:54 AM (AKT)	
Jon Jones	
Hangar/Maintenance Control Center	
No CBI	
No PII	
While waiting for someone that was familiar with the Hangar operations, I saw an unlabeled fiberboard container, like those used to hold waste fluorescent lamps. I lifted the lid on the container and saw that it held, what appeared to be 40+ waste fluorescent lamps. Several of the lamps had darkened or burnt looking ends, indicative of waste fluorescent lamps. At the time of the inspection, the fiberboard container was not labeled as Universal Waste.	

Document Log

Document Type	Document Name	Contains CBI	Contains PII	Uploaded By	Date Received
Facility Map	Facility diagrams-drawings.pdf	No	No	Jon Jones	02/15/2022
Communications	20220121_131625 (1).jpg	No	No	Jon Jones	02/15/2022
Communications	IMG_0087.JPG	No	No	Jon Jones	02/15/2022
Communications	IMG_0088.JPG	No	No	Jon Jones	02/15/2022
Communications	IMG_0090.JPG	No	No	Jon Jones	02/15/2022
Communications	RE_ Wipes.pdf	No	No	Jon Jones	02/15/2022
Communications	RE_ Wipes2.pdf	No	No	Jon Jones	02/15/2022
Manifests	scanner@ravnalaska.net_20220121_153046.pdf	No	No	Jon Jones	02/15/2022