



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Federal Facility Enforcement Office (FFEO)
1200 Pennsylvania Ave NW
Washington, DC 20460

Regulatory Program: Resource Conservation and Recovery Act (RCRA) - Subtitle C
Inspection Date(s): June 14, 2023
Inspection Type: Compliance Evaluation Inspection ("CEI")
Facility Name: ALASKA AEROSPACE CORPORATION PACIFIC SPACEPORT COMPLEX
Mailing Address: MP 13 Pasagshak Road, Kodiak, Alaska 99615
Facility Location: MP 13 Pasagshak Road, Kodiak, Alaska 99615
Federal Facility: Yes
Facility Registry Number: 110007918361
RCRA Permit Number: AKR000003988
NAICS Code: 928110/9711, National Security

Facility Representatives:

Abbie Cottle, ABL Site Manager
(310) 658-3594 Email: abbie.cottle@ablespace.com
Paul Pena, Pacific Spaceport Complex Alaska GSO
(907) 942-4485 Email: ppena@akaerospace.com

State Inspector:

Alan Pefley, Hazardous Waste Inspector
(907) 269-4567 alan.pefley@alaska.gov

EPA Inspectors:

Tierra Robinson, Physical Scientist/Inspector
(202) 564-2067 robinson.tierra@epa.gov
Jessica Schlafstein, Physical Scientist/Inspector
(202) 564-6599 schlafstein.jessica@epa.gov
Jon Jones, Environmental Protection Specialist/Inspector
(907) 227-4316 jones.jon@epa.gov

**EPA Lead Inspector
Signature/Date**

TIERRA ROBINSON
Digitally signed by TIERRA ROBINSON
Date: 2024.05.30 14:22:03 -04'00'

Tierra Robinson

Date

**Peer Review
Signature/Date**

Jones, Jon
Digitally signed by Jones, Jon
Date: 2024.05.30 12:26:13 -08'00'

Jon Jones

Date

**Acting Supervisor
Signature/Date**

DOMINIQUE FREYRE
Digitally signed by DOMINIQUE FREYRE
Date: 2024.05.30 14:43:20 -04'00'

Dominique Freyre

Date

Contents

SECTION I – INTRODUCTION.....	1
Background	1
Facility Description	1
Facility Access	2
Opening Conference.....	3
SECTION II – OBSERVATIONS	4
SECTION III – RECORDS REVIEW	5
Contingency Plan and Quick Reference Guide (QRG)	5
Waste Shipments and Manifests	5
Biennial Reports	5
Training Records.....	5
Weekly Inspection Logs	6
SECTION IV – CLOSING CONFERENCE AND FOLLOW UP.....	6
SECTION V – AREAS OF CONCERN	7
SECTION VI - ATTACHMENTS	8

SECTION I – INTRODUCTION

On June 14, 2023, lead inspector, Tierra Robinson accompanied by Jessica Schlafstein, (“inspection team”) inspectors from the Federal Facilities Enforcement Office (FFEO) of the United States Environmental Protection Agency (EPA) Headquarters, Washington, DC, conducted an announced compliance evaluation inspection (CEI) at Alaska Aerospace Corporation Pacific Spaceport Complex (“Facility” or “PSCA”) located at MP 13 Pasagshak Road, Kodiak, Alaska 99615. The inspection focused on the Facility’s compliance with the regulations of Subtitle C of the Resource Conservation and Recovery Act (RCRA) regarding the management of hazardous solid waste under EPA ID AKR000003988. The inspection team was accompanied by EPA Region 10 inspector, Jon Jones, and Alaska Department of Environmental Conservation (ADEC) inspector, Alan Pefley. This report is based on information supplied by Facility representatives, observations made by the inspection team, and records and reports maintained by the facility including, but not limited to: direct observations made by the inspection team, photographs taken, verbal or written statements made the facility representatives during or subsequent to the CEI, and materials, processes, data or documents shown, demonstrated, or submitted to the EPA 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 EPA, State, and public records may be included in this report.

Background

This inspection was based on a request from EPA Region 10 to evaluate the Facility’s overall compliance with Subtitle C of RCRA. EPA had not previously inspected this facility. ABL Space Systems (“ABL”), the other party inspected, was the last tenant at the Facility in 2023. In January 2023, a failed rocket launch and subsequent explosion and fire caused debris at the Facility that required clean-up. The volume of debris prompted ABL to apply for a separate EPA identification number as a large quantity generator. Further information about the incident and change in generator status is provided in *Section I – Introduction: Opening Conference*.

Facility Description

PSCA is located on 3,717 acres of state-owned land in the Narrow Cape of Kodiak Island, Alaska, which is the second largest island in the United States. Kodiak Island is situated in the Gulf of Alaska in the Kodiak Island Archipelago, which is comprised of 16 major islands parallel to the Katmai Coast along the Alaska Peninsula for 177 miles. The island is in southern Alaska separated from the Alaska Peninsula by the Shelikof Strait, 30 miles off the Alaskan coast. The PSCA site is located 25.5 miles south of the town of Kodiak. The Facility is owned by the state of Alaska, Department of Administrative Services and operated by the Alaska Aerospace Corporation (AAC), a corporation owned by the state of Alaska. AAC has an Interagency Land Management Assignment for 30 years that permits the core launch activities. In 2023, AAC

submitted a renewal application for another 30 years to continue operations and also to add 88 acres of a former Coast Guard long range navigation site, LORAN¹. PSCA is the first Federal Aviation Administration (FAA)-licensed spaceport not co-located on a federal range².

The Facility opened in 1998 as the Kodiak Launch Complex and has supported 31 launches for sub-orbital and orbital launch vehicles. The Facility currently includes two launch pads with a mission control center, a clean room for preparing satellites to launch, and a 17-story tall rocket assembly building. Launchpad 1 is designated for orbital launches and launchpad 2 is for sub-orbital flights. The first launch was conducted in August 1998. Most launches were conducted by the federal government (i.e., Department of Defense). On August 25, 2014, the Department of Defense experienced a failed launch of its Advanced Hypersonic Weapon aboard a STARS-IV missile which heavily damaged the Facility's Integration Processing Facility (IPF) and launch pads 1 and 2 (see map on page 4 of **Attachment #1**)³. The Facility closed for two years, was renamed Pacific Spaceport Complex in 2015, and reopened in August 2016.

The Facility operates under NAICS 927110 (space research and technology) and notified as a large quantity generator of hazardous waste on March 28, 2023 for the first time. This inspection occurred 78 days after this notification to EPA. Previously, per RCRAInfo, the facility has notified as a very small quantity generator (VSQG) since December 2001. The site has no satellite accumulation areas (SAAs) and one less than 90-day accumulation point on Pad 3. The State of Alaska has not been authorized pursuant to Section 3006 of RCRA, 42 U.S.C. § 6926, to carry out a hazardous waste program in lieu of the Federal program. Pursuant to Section 3008(a) of RCRA, EPA may directly enforce the federal hazardous waste program in the State of Alaska. The Facility Registry Service identification number for the Facility is not associated with any other permits and reporting (e.g., Clean Water Act, Clean Air Act). EPA had not previously inspected this facility.

Facility Access

A notification of inspection was emailed to the Facility on 6/13/2023. A response from Eve Lechowicz, chief of staff for ABL Space Systems, arranged Facility escort Abbie Cottle, site manager, to meet the inspection team at 0900 at the entrance at 41520 Pasagshak Rd, Kodiak, AK, 99615. No access issues were encountered on-site.

For future reference, the facility's location on a remote island may require advance notice for inspection to ensure Facility representatives are on the island.

¹ <https://aws.state.ak.us/OnlinePublicNotices/Notices/View.aspx?id=211831>

² <https://akaerospace.com/spaceports/>

³ <https://www.nasaspaceflight.com/2016/08/kodiak-spaceport-reopens-2014-failure/>

Opening Conference

The inspection team arrived at the Facility entrance on 6/14/2023 at 0900. An opening conference was held in the Range Control Center (RCC) building (see **Attachment #2**). The lead inspector showed her inspection credentials to all in attendance to begin the meeting. The inspection team provided an overview of the scope of the inspection to the personnel, including why the Facility was selected for inspection. The EPA inspectors also let the Facility know that a closing conference would be conducted at the end of the inspection to discuss any findings or areas of concern found during the inspection. The lead inspector informed the site representatives about the right to claim any information gathered during the inspection as Confidential Business Information (CBI). The Facility's site safety protocols were reviewed. General personal protective equipment (PPE) (i.e., steel-toed boots, goggles, high-visibility vest, winter coat) were used.

Much of the opening conference was spent explaining the division of ownership and operations at the Facility. The representatives present for PSCA and ABL both explained how and why they were operating separately and independently. PSCA provides facility space and launch pads to various entities, including ABL, on a temporary basis to conduct rocket launches. PSCA leases pad space to tenants for specified amounts of time. Tenants bring their own operations to include crew, contractors, equipment, materials, and contracts for waste removal. Once operations are complete, the tenant removes all their operations, materials, and wastes from the site. At the time of the inspection, all other previous tenants had concluded their leases and removed their operations from PSCA except for ABL. ABL leased space, Pad 3, from the Facility to prepare to launch their RS-1 rocket in January 2023. On January 10, 2023, premature engine shutdown on the rocket caused the rocket to plummet back to the Facility sixty feet from the launchpad, eleven seconds into liftoff causing a large fire that continued for 36 hours⁴. Facility representatives referred to this incident as "the Anomaly". The ABL news release indicates that debris scattered over a quarter-mile radius and was contained within the designated hazard area. Debris and waste from this incident prompted ABL to apply for an EPA large quantity generator identification number. When ABL applied for a RCRA identification number, data entry changed the name of the facility in ECHO/RCRAInfo to "ABL Space Systems Pacific Spaceport Complex Alaska". However, ABL is a temporary tenant of the Pacific Spaceport Complex Alaska, having leased pad space for the rocket launch. Due to the Anomaly and the ongoing cleanup and mitigation, ABL essentially applied for an EPA ID as a co-generator. Generally, EPA manages co-generators under one operator ID, not as separate entities with separate IDs. Further information about the ownership and operations status is provided in *Section IV – Closing Conference and Follow-up*.

⁴ <https://ablspace systems.com/news/flight-1-l7-update/>

At the time of the inspection, operations were in “stand down”, meaning that the no tenants at the Facility were doing work on-site. During stand down, operating hours at the Facility are 0800-1700. ABL was the last tenant at the Facility, so the last operations ended when the pad that ABL leased was demolished during the Anomaly. During campaign mode, leasing tenants are on-site at PSCA in their respective areas or pads preparing for rocket and satellite launches. ABL runs two shifts during campaign mode (0800-1700 and 1600 to 0000). The Facility has not closed any storage areas, nor has any plans to open new storage areas. There is no treatment of waste on-site; there are only storage activities on ABL’s leased pad. PSCA staff indicated that they have not generated or stored hazardous waste on-site. ABL staff said they were storing waste on-site on Pad 3. Maintenance activities for PSCA generate mostly universal wastes (e.g., changing light ballasts). ABL staff indicate that the lease agreement with AAC prohibits receiving waste from off-site. Further information about the waste handling processes are provided in *Section II – Observations*.

NWFF Environmental (“NWFF”) provides consulting and emergency management services for AAC, but not the tenants. Ryan Sharratt, CEO of NWFF, was present for the inspection. Ryan indicated that a month ago, their environmental health and safety person, Heather, left the position. The Facility has not had any new tenants so they have not backfilled the position. For emergencies, AAC has their own Emergency Response Plan and all tenants are expected to adopt and adhere to it. During rocket launches, the Facility has the local fire department and state trooper on standby in case wildfires start. During the January 2023 anomaly, the fire lasted for 36 hours; ABL maintained staff on-site for the duration.

For the site tour, the inspection team requested to examine Pad 3 and the Maintenance Support Facility.

SECTION II – OBSERVATIONS

Pad 3

The site tour began at Pad 3, ABL’s tenant pad and site of the January 2023 Anomaly. Several photos of Pad 3 were provided by Abbie Cottle (see **Photo Log, Photographs #1-9**). The Anomaly fire destroyed the temporary canvas building and other structures and materials on Pad 3. Restoration Science and Engineering was hired to conduct soil and groundwater sampling to determine if any residual fuel remained after the fire. Brechan, a local construction company, was hired to assist ABL in the cleanup of the Anomaly. All remaining wastes were being accumulated behind the blast wall on the pad. ABL staff noted that majority of the resultant waste was general solid waste in addition to petroleum oil and lubricant (POL).

ABL staff indicated that they had 275-gallon intermediate bulk containers (IBCs) that were pending analysis on Pad 3 (see **Photo Log, Photographs #10-15**). The IBCs were labeled as used oil/fuel oil and H₂O, pending analyticals with an accumulation start date of March 31, 2023

(see **Photo Log, Photograph #11**). None of the IBCs were labeled with an indicator of the hazards (see **Section V – Areas of Concern, #1**). The staff wrote “flammable” on the IBCs with a permanent marker. ABL said they received permission from ADEC to separate the oils from water to recycle the waste. The waste was waiting on a shipment that would occur sometime in June to get the waste off-site within 90 days, which would have been June 29, 2023. VOC and toxic testing were complete; ABL was waiting on the ignitable results before selecting a disposal facility.

There were three 55-gallon drums labeled as used activated carbon with a beginning accumulation date of March 31, 2023 and two 55-gallon drums labeled used oil. ABL staff said that activated carbon gets recycled through Pacific Coast Carbon.

Maintenance Bay

AAC obtains contractors for maintenance services through government procurement. Those contractors conduct maintenance activities, such as changing the light ballasts, then take the resultant waste with them upon exit. The maintenance bay was a storage for confidential electronic equipment. Photos were not permitted in this building. The inspection team noted a few nearly full aerosol cans on shelves and desks throughout the building, and inquired where the waste would be stored. Ryan Sharratt was not sure what happened with the empty aerosol containers. Staff were told to collect in Bay 3 for now. They are still in the process of generating a waste management plan since losing their EH&S person.

Area 1

AAC indicated that no other tenants are occupying any of the other areas at the time of the inspection. The inspection team asked to ride by the other areas for visual inspection to confirm. Area 1 was nearly a vacant lot. There was a shipping container outfitted as an office, but there were no materials inside. There was no evidence of any tenants in the other areas; there were no buildings, equipment, or materials.

SECTION III – RECORDS REVIEW

Contingency Plan and Quick Reference Guide (QRG)

A Contingency Plan/Emergency Response Plan and QRG were not available at the time of the inspection.

Waste Shipments and Manifests

There were no manifest records available at the time of the inspection.

Biennial Reports

There were no biennial report records available at the time of the inspection.

Training Records

There were no training records available at the time of the inspection.

Weekly Inspection Logs

There were no inspection logs of the storage area at Pad 3 available at the time of the inspection. Abby stated that while there are no physical logs, she does daily, weekday inspections of Pad 3.

SECTION IV – CLOSING CONFERENCE AND FOLLOW UP

At 1222, the inspection team started the closing conference by reiterating the purpose of the inspection. The attendees initialed their names on the opening conference sign in sheet (see **Attachment #2**). The inspection team made sure the Facility personnel understood that the comments and observations made during the closing conference may not be all inclusive and that any preliminary observations discussed were not compliance determinations. All preliminary observations shared are subject to further investigation by EPA staff upon the additional review of records and documentation. Additional observations may be contained in this inspection report and the attachments that were not identified at the time of the closing conference. The Facility representatives were reminded that they could make claims of CBI on the material gathered during the inspection. No such CBI claims were made. The inspection team thanked the Facility for their participation in the inspection and gave them a brief outline of the next steps. The inspection was completed at 1238, and the inspection team departed the Facility.

Following the inspection, ABL Environmental Health and Safety Manager, Tate Gordon emailed the lead inspector on June 21, 2023 with the photos that Abbie Cottle took during the inspection and for clarification and guidance on the generator identification number assigned to ABL (see **Attachment #3**). The email notes that ABL was seeking a separate generator number from Alaska Aerospace Corporation, as they are a separate entity and leasing space at the Facility. On June 29, 2023, John Cramer, President and CEO of Alaska Aerospace, emailed the lead inspector requesting that ABL be removed from association with the Facility as the facilities do not have a joint venture (see **Attachment #4**). Both entities were informed that EPA R10 will follow up with the Facility and ABL about the possible co-generator status.

SECTION V – AREAS OF CONCERN

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

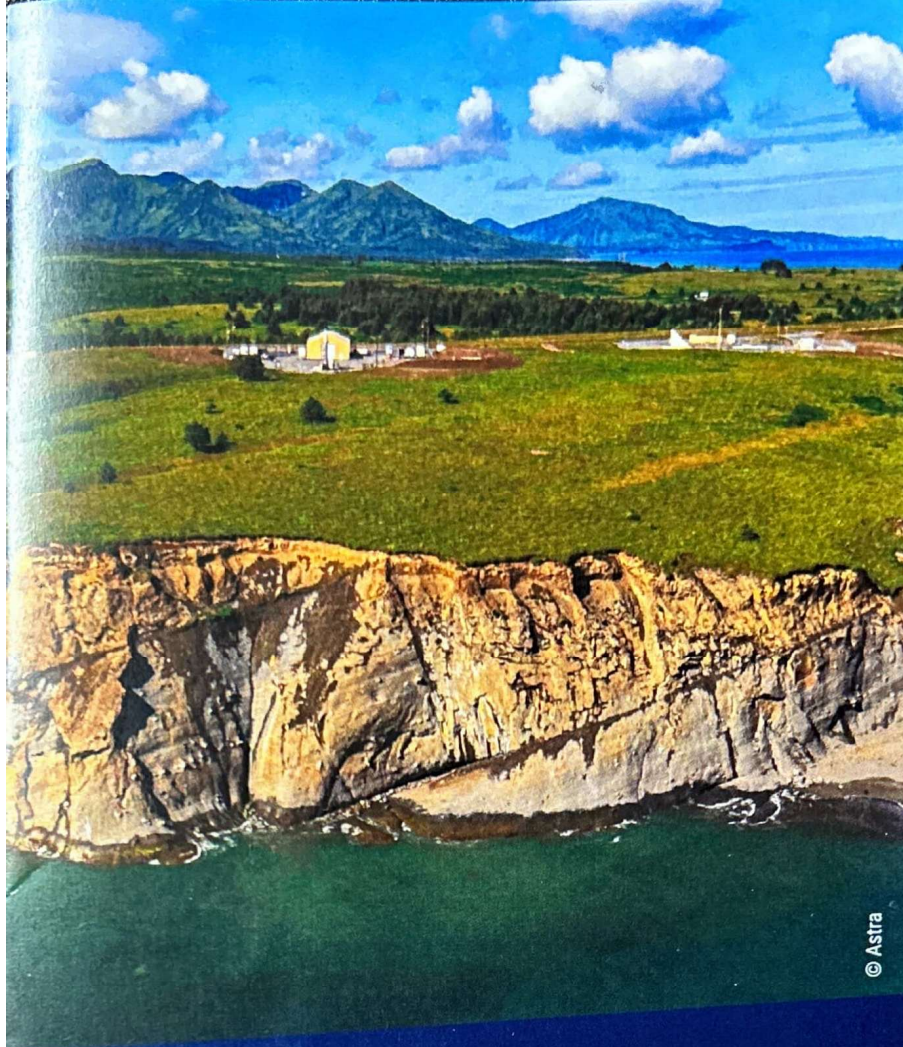
1. On Pad 3, the POL waste awaiting results from analyticals was not marked with an indicator of the possible hazards. The IBC totes were labeled as “flammable” during the inspection.

SECTION VI - ATTACHMENTS

Photo Log

- | | |
|---------------|--|
| Attachment 1: | Visitor Information, Maps |
| Attachment 2: | Sign-in sheet for Opening/Closing Conference |
| Attachment 3: | Email from ABL, June 21, 2023 |
| Attachment 4: | Email from Alaska Aerospace, June 29, 2023 |

ATTACHMENT 1: Visitor Information, Maps



© Astra

ALASKA AEROSPACE



Affordable. Flexible. Responsive.



**America's Premier Commercial
Spaceport**

About Us

Alaska Aerospace Corporation (AAC) is a state-owned company established in 1991 to create a viable space industry in Alaska and expand aerospace opportunities statewide.

AAC's primary focus is creating and sustaining an economic hub around a spaceport. To this end, AAC operates the Pacific Spaceport Complex - Alaska (PSCA), a multi-user Federal Aviation Administration (FAA) licensed commercial spaceport on Kodiak Island.

Our primary operational hub is PSCA at Narrows Cape, Kodiak Island, Alaska with corporate headquarters in Anchorage, Alaska.

Established and trusted launch capabilities

- Government & commercial users
- Twenty-eight launches since 1998
- Solid-fueled & liquid-fueled experience
- Orbital and sub-orbital capability

Business-oriented, low-cost, efficient & effective

- No sustainment funding from government
- Wholly-owned subsidiary, Aurora Launch Services, provides flexible and cost-efficient staffing solutions for daily operations and surge support



Established Commercial Spaceport

PSCA's large launch azimuth range allows direct access to a wide variety of high-inclination and polar orbits.

Launching from PSCA is enabled by a robust set of existing logistics infrastructure:

- Year-round, ice-free, deep-water port with regular container ship deliveries of rocket bodies and GSE
- C-17 / C-5 capable airport co-located with U.S. largest USCG base supports military systems
- Daily scheduled commercial jet passenger service and regular air cargo deliveries allows for rapid transit of staff, payloads, and last-minute materials
- Dual-path fiber optics directly from PSCA landing station allows for real-time support of off-site launch staff with secure low-latency broadband

In the upcoming years, PSCA operations are expected to support multiple government and commercial launch vehicle operators.

Comprehensive Services

Mission Planning & Integration

- Assessing how the spaceport can meet customer needs
- Coordinating closure areas with agencies and stakeholders

Range Safety

- Launch Decision Authority (LDA)
- Range Control Officer (RCO)
- Ground Safety Officer / Range Surveillance & Control (GSO/RSC)
- Operations Director (OD)

Instrumentation

- Three Telemetry and Command Destruct Systems
- On-site and off-axis coverage; two transportable systems

Meteorological Support

- Launch window forecasts
- Launch Commit Criteria reporting

Security and Emergency Services

- Facility Security Officer (FSO) and Site Security
- On-site EMT and Fire Response

Site Engineering & Operations

- Maintenance and sustainment facilities
- Logistics support - customers, vehicle, propellants, payload

Building an Alaskan Space Workforce

.....

Developing an Alaska-grown workforce

- Transitioned from ~75% Lower-48 workforce to 95% Alaska workforce (75% on Kodiak)

Partnered with University of Alaska Space Grant Program

- Sponsor of Internship Programs at AAC & PSCA

Enhancing technical job skills through technical training and career development

- On-the-job skill learning opportunities
- Increased STEM-focused responsibilities for staff
- Experience at multiple spaceports and mission types

PSCA provides all-indoor, all-weather processing and provides optimal support for small lift rockets and satellites into sub-orbital and polar, sun-synchronous, and highly elliptical orbits over the North Pacific Ocean.

We take on challenges with innovation, grit and resourcefulness. The same holds true to accessing space!

Inquiries:

info@akaerospace.com

Career Opportunities:

careers.ctr@akaerospace.com



***From the Last Frontier
To the Final Frontier***

Alaska Aerospace Corporation

4300 B Street, Suite 101
Anchorage, AK 99503
907-561-3338

For more information:
www.akaerospace.com



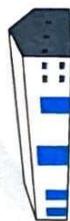


Visitor Map

PACIFIC OCEAN

← Kodiak

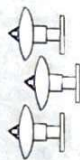
Maintenance Support Facility - MSF



Range Control Center - RCC



Weather Balloon Building



Instrumentation Field

BURTON ROAD

Narrow Cape Lodge



PASAGSHAK ROAD

Payload Processing Facility - PPF



Area 1

Area 4

Area 2

U.S. Coast Guard
Loran "C" Station
(deactivated)

Rocket Motor
Storage Facility - RMSF



Area 5

Pad A

Pad B

Pad C

Pad D

Launch Pad 1 - LP1

Spacecraft & Assemblies
Transfer Building - SCAT/LP2

Integration Processing Facility - IPF

PSCA
LOWER RANGE

TWIN LAKES

FOSSIL BEACH



BARRY LAGOON

PSCA VIRTUAL TOUR



Commercial Launch Pads



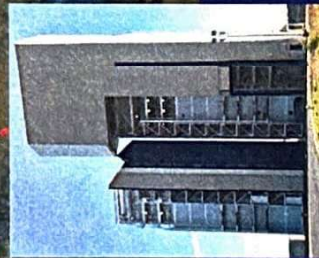
Integration & Processing Facility
Spacecraft & Assemblies Transfer



Launch Pad 2



Launch Service Structure
(Launch Pad 1)



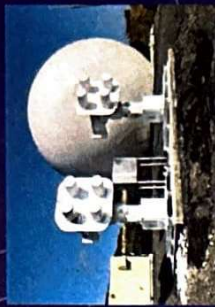
Rocket Motor
Storage Facility



Launch / Mission Control Centers



Maintenance Support
Facility



Instrumentation Field



Payload Processing
Facility

SIX LAUNCH PADS PROVIDE RESILIENCY, RESPONSIVENESS, AND FLEXIBILITY

LP-2
Flat-pad for solid, liquid, hybrid

LP-3A
Gravel pad for suborbital systems

New Launch Vehicle
Integration Facility
Constructed for LP-3C

LP-1
Larger solid-fuel rockets

LP-3C
Multi-Use ABL/USG
Flat pad for solid, liquid, hybrid

LP-3B
Astra's high-inclination launch site
Flat pad for solid, liquid, hybrid

LP-3D
Gravel pad for suborbital systems

ATTACHMENT 2: Sign-in Sheet, Opening & Closing Conference

MEETING SIGN-IN SHEET

Project:	Pacific Spaceport Kodiak	Opening Conf Date:	10/14/23 9:32
Lead Inspector:	Tierra Robinson	Closing Conf Date:	10/14/23 12:38

Name	Title	Phone	E-Mail	Initial if present at the closing conference
Jessica Schlafstein	Engineer, Inspector	202-580-9983	schlafstein.jessica@epa.gov	JS
Tierra Robinson, EPA	Scientist, Inspector	202-578-5052	robinson.tierra@epa.gov	TR
Abbie Cottle	^{ASL} Site Manager	310 658-3894	abbie.cottle@alaskaerospace.com	AC
Rochelle Kwood	PSEA	907-654-5802	rochelle.wood.ctr@alaskaerospace.com	
Kaydee Hughes	PSCA/Facility Man.	701-500-1723	kaydee.hughes.ctr@alaskaerospace.com	KH
Ryan Sharratt	CONSULTANT ADEC	907-942-5544	RYAN@NWIFFENVIRO.COM	RS
Alan Pefley	EPS III	907-269-4567	alan.pefley@alaska.gov	AP
Jon Jones	PSEA INSPECTOR	907-227-4316	jones.jm@epa.gov	JJ
Paul Pena	PSCA GSD	907 942 4485	ppena@alaskaerospace.com	PP

ATTACHMENT 3: Email from ABL

Robinson, Tierra

From: Tate Gordon <tate.gordon@ablspacesystems.com>
Sent: Wednesday, June 21, 2023 6:27 PM
To: Robinson, Tierra
Cc: Schlafstein, Jessica; Jones, Jon; Bobka, John; Doster, Kathleen; bryan.jones@totusehs.com; Eve Lechowicz; Tim Mullins; Steve Dalton
Subject: RE: [RESPONSE NEEDED] Upcoming EPA RCRA-C Inspection at ABL SPACE SYSTEMS PACIFIC SPACEPORT COMPLEX-ALASKA, June 14-15, 2023
Attachments: OneDrive_1_6-21-2023.zip; Kodiak Spaceport Inspection Notice and Document Request.pdf
Follow Up Flag: Follow up
Flag Status: Completed
Categories: In Office/To Do Task

Hello Ms. Robinson,

I would first like to introduce myself: I am Tate Gordon, the Environmental Health and Safety Manager for ABL Space Systems; unfortunately I was out of the office when I received your email. We hope that our Kodiak site team was able to provide you with full access to the site for your inspection and everything went smoothly.

As a follow up to the inspection conducted on June 14, 2023, I would like to confirm the following:

- What is the anticipated timeline for the EPA documented inspection report?
- ABL has a list of items that were requested as part of the site inspection. Does the EPA prefer for us to respond to the inquiries now or wait and provide one comprehensive response once the official inspection report is received?
- Please find ABL's LP-3C site photos taken during the inspection. Please let me know if any additional photos or clarification is needed.
- Does the EPA intend to issue separate inspection reports to ABL Space Systems and Alaska Aerospace Corporation?

We wanted to also ask for additional clarification and guidance in regard to the issuance of our EPA Hazardous Waste Generator Identification number. Following the site inspection, ABL noted that we were issued Alaska Aerospace Corporation's (AAC) EPA ID Number, which was previously deactivated. Please note that ABL Space Systems is a separate entity from AAC and we are currently leasing property, including LP-3C, from AAC at the Pacific Spaceport Complex - Alaska. When ABL submitted our application for issuance of a unique EPA ID Number, we provided our company (site operator) information in section 9B and provided the site owner's (AAC) information in section 9A. Can the EPA please advise (1) if we completed our application correctly with respect to this legal distinction and (2) if the resulting EPA ID number is accurate in this circumstance or if a new EPA ID number should be issued given that we are entirely legally separate from AAC?

ITEM 9 – LEGAL OWNER AND OPERATOR OF THE SITE

This section should be used to indicate all owners and operators of this site. If your Reason for Submittal is for an Electronic Manifest Broker whose site of business is an office only, and you do not otherwise physically generate, treat, store, recycle or dispose of hazardous waste on site, you do not have to fill out this item.

A. NAME OF SITE'S LEGAL OWNER

Provide the name of your site's legal owner(s). This includes owner(s) of the building(s) and land. Please review these definitions:

Owner – The person who owns a RCRA site or part of a RCRA site. **Note:** This includes the owner(s) of the building(s) and/or land. This may be an individual, company, or business name. See **Person**.

Person – An individual, trust, firm, joint stock company, Federal Agency, corporation (including a government corporation), partnership, association, State, municipality, commission, political subdivision of a State, or any interstate body.

B. NAME OF SITE'S LEGAL OPERATOR

Provide the name of your site's operator. Please review these definitions:

Operator – The person responsible for the overall operation of a RCRA site. **Note:** This is the legal entity which controls the RCRA site operation rather than the plant or site manager. This is usually a company or business name, but may be an individual. See **Person**.

Person – An individual, trust, firm, joint stock company, Federal Agency, corporation (including a government corporation), partnership, association, State, municipality, commission, political subdivision of a State, or any interstate body.

Thank you for the clarification of these questions and please kindly confirm receipt. If you have any additional requests, please feel free to reach out to me via email or contact me directly at (424) 225-9232.

Regards,
Tate



Tate Gordon

EHS Manager

224 Oregon St, El Segundo, CA 90245

Tate.gordon@ablspace systems.com

(424) 225-9232

From: Robinson, Tierra <Robinson.Tierra@epa.gov>

Sent: Monday, June 12, 2023 9:06 PM

To: bryan.jones@totusehs.com; JOHN.ZBITNOFF@AKAEROSPACE.COM; Tate Gordon <tate.gordon@ablspace systems.com>

Cc: Schlafstein, Jessica <Schlafstein.Jessica@epa.gov>; Jones, Jon <Jones.Jon@epa.gov>; Bobka, John <Bobka.John@epa.gov>; Doster, Kathleen <Doster.Kathleen@epa.gov>

Subject: [RESPONSE NEEDED] Upcoming EPA RCRA-C Inspection at ABL SPACE SYSTEMS PACIFIC SPACEPORT COMPLEX-

ATTACHMENT 4: Email from Alaska Aerospace

Robinson, Tierra

From: Alyssa Hodum <alyssa.hodum.ctr@akaerospace.com>
Sent: Thursday, July 6, 2023 3:41 PM
To: Robinson, Tierra; Schlafstein, Jessica
Cc: John Cramer; Maggie Minton; Robert Greene; Ryan Sharratt; Shannon Edwards; Environmental Compliance
Subject: PSCA Site Visit 6/14/23
Attachments: PSCA Site Name 6.29.23.pdf

Categories: In Office/To Do Task

Good afternoon Tierra,

During the recent PSCA site inspection, it was noted that there were discrepancies between the EPA Generator ID and the facility operator. Please find the attached letter further detailing this issue. We appreciate your assistance in this matter.

Thank you,



Alyssa Hodum

License Technical Analyst, [Aurora Launch Services](#)

A wholly-owned subsidiary of Alaska Aerospace

O: 907-771-8035



Alaska Aerospace Corporation
4300 B St # 101
Anchorage, Alaska 99503

June 29, 2023

U.S. Environmental Protection Agency
ATTN: Tierra Robinson | Environmental Scientist
CC: Jessica E. Schlafstein | Physical Scientist
1200 Pennsylvania Ave NW, MC 2261A
Washington, DC 20460

SUBJECT: Letter for Requested Action, Pacific Spaceport Complex – Alaska

To Whom It May Concern,

This letter of requested action is being provided based upon a physical site inspection performed on June 14, 2023. During this inspection noted discrepancies regarding EPA Generator IDs were discussed and theorized how these issues have unfolded.

The Pacific Spaceport Complex – Alaska (PSCA) is one of 14 Federal Aviation Administration (FAA) licensed Spaceports in the United States. PSCA is owned and operated by the State of Alaska under the state corporation Alaska Aerospace Corporation (AAC). At PSCA, we launch rockets in the small and medium class to orbital and suborbital polar and Sun-synchronous orbits.

The company ABL is a customer of AAC, they own and bring their rockets to AAC's facility to launch. When ABL received the notice 'Compliance Evaluation Inspection (CEI) ABL Space Systems Pacific Spaceport Complex – Alaska AKR000003988' it did not go to the operator of the site AAC.

Somehow, ABL was noted as facility operator, this is incorrect and AAC should be the entity associated with the site PSCA AKR000003988. AAC requests that ABL be removed from association with the PSCA and that the name 'ABL Space Systems Pacific Spaceport Complex – Alaska' be changed back to its correct name Pacific Spaceport Complex – Alaska. Failure of changing the name infers a Joint-Venture between PSCA and ABL, which is not correct.

We sincerely appreciate the assistance in working with us to clear up this clerical issue. The points of contact for PSCA are the following:

John Cramer, AAC CEO
John.Cramer.ctr@akaerospace.com, 907-632-2349

Rob Greene, PSCA Site Manager
Robert.Greene@akaerospace.com, 907-942-7929

Alyssa Hodum, License Technical Analyst
Alyssa.Hodum.ctr@akaerospace.com, 907-771-8035

Thank you,

DocuSigned by:
A blue ink signature of John W. Cramer.
BAE2A60CF1A14DC
John Cramer
President & CEO
Alaska Aerospace