

EPA REGION 10 Enforcement Division

INSPECTION REPORT

Inspection Entry Date/Time	07/12/2023 01:59 PM (AKT)	Announced: No
Inspection Exit Date/Time	07/12/2023 02:39 PM (AKT)	Access: Granted
Regulatory Program	RCRA	
Type of Inspection	Compliance Evaluation Inspection (CEI)	
Company Name	North Slope Borough (NSB)	
Facility or Site Name	North Slope Borough Sa 10 a.k.a. Vehicle Maintenance Shop (VMS)	
Facility/Site Identifier	AKD983066028	
Facility/Site Physical Address	Tracts 73B & 74	
City, State, Zip Code	Prudhoe Bay, AK 99734	
County/Borough	North Slope Borough	
Generator Status	Very Small Quantity Generator (VSQG)	
NAICS	811111 – General Automotive Repair	
Type of Operation	Vehicle Maintenance	
Geographic Coordinates	70.209761, -148.404393	
Mailing Address/Secondary Address	Mr. Andrew Adams, Vehicle Maintenance Shop Manger 1234 Drill Site 12 Road, P.O. Box 340044, Drop Point 4 Prudhoe Bay, AK 99734 aadams@iceservices.net CC: Robert Scherer, VMS Manager rscherer@iceservices.net Rich Helinski, Projects/Operations Manager rhelinski@iceservices.net Patricia Brower, NSB Liaison patricia.brower@north-slope.org Cynthia Trapp, NSB, DPW, Environmental Official cynthia.trapp@north-slope.org	
City, State, Zip Code	Prudhoe Bay, AK 99734	
Permit Number (If Applicable)	Not Applicable	
Lead Inspector:		
Jon Jones	JONATHAN JONES	Digitally signed by JONATHAN JONES Date: 2023.08.31 13:07:47 -08'00'
	EPA Region 10	Jones.Jon@epa.gov (907) 271-6329
Supervisor Review:		
Matt Quarterman	MATTHEW QUARTERMAN	Digitally signed by MATTHEW QUARTERMAN Date: 2023.08.31 15:09:46 -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 North Slope Borough (NSB) Sa 10 a.k.a. Vehicle Maintenance Shop (VMS) Facility (the "Site," "Facility," or "VMS"), located at Tracts 73B & 74, Prudhoe Bay, AK 99734, at 01:59 PM (AKT) on 07/12/2023 for an unannounced inspection. EPA Region 10 Lead Inspector presented credentials to and informed Justin Smith that this was an EPA Region 10 inspection to determine compliance with Resource Conservation and Recovery Act (RCRA).

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 2023.

This report is based on information supplied by North Slope Borough VMS 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
RCRA Inspector/USEPA	Matt Quarterman	(206) 553-2146	quarterman.matthew@epa.gov	Yes	Yes
RCRA Inspector-in-training/ADEC	Alan Pefley			Yes	Yes
Light Duty Mechanic/Ice Services, Inc.	Justin Smith	(907) 659-0107		Yes	Yes
Vehicle Maintenance Shop Manager/Ice Services, Inc.	Andrew Adams	(907) 448-3053	aadams@iceservices.net	No	Yes

Opening Conference

Shortly after arriving at the VMS, we were met outside by Mr. Justin Smith, Light Duty Mechanic and Moustapha Niang, Shop Mechanic. We entered the VMS, and I held the opening conference with Mr. Smith. Mr. Smith told us that the Shop Manager, Andrew Adams, was on the phone when we arrived.

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.

Mr. Smith told us that the North Slope Borough owned the VMS. He told us that Ice Services, Inc. operated the facility.

Facility/Site Information

The NSB VMS is a small shop with four vehicle service bays. The shop maintains both Ice Services, Inc. and NSB vehicles. At the time of the inspection, there were three Shop Mechanics onsite and a Shop Manager. The shop operates seven days a week. The facility notified as a VSQG and Mr. Smith verified that the facility was a VSQG.

Process Description

According to Mr. Smith, the following wastes are generated at the VMS:

- Used oil - burned onsite in a used oil burning space heater.
- Used oil filters - hot drained, crushed and disposed of with the oily waste.
- Used antifreeze - managed through US Ecology.
- Waste aerosol cans - waste aerosol cans that last contained product (paints, lubricants, and solvents) are punctured onsite with the empty aerosol cans being managed with the oily waste.
- Waste aerosol can residue - not being collected during can puncturing.
- Lead-acid batteries - recycled through Brooks Supply in Deadhorse, AK.
- Waste tool and radio batteries - managed as solid waste and disposed of at the Oxbow Landfill.
- Waste lamps - lamps are changed out by another section of Ice Services and taken to the Ice Services camp site.
- Oily waste - (Absorbents/rags, oil filters, and punctured waste aerosol cans) disposed of at the Oxbow Landfill.

We were accompanied during the inspection by Mr. Smith. We looked at the facility's processes, hazardous waste management practices, generation points, and accumulation areas. We 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
Vehicle Maintenance Shop	Maintenance of Ice Services vehicles (Pick-ups) and NSB water and sewer trucks, generating: -Used oil -Used antifreeze -Oily waste rags/absorbents -Lead-acid automotive batteries -Waste aerosols (Paints, solvents, lubricants) -Tool/radio batteries	Yes

SECTION II – OBSERVATIONS

Building: Vehicle Maintenance Shop			
Observation #: JJ1-OB-001	Date: 07/12/2023	Contains AOC: Yes	Contains CBI: No
Person Interviewed: Justin Smith		Title: Light Duty Mechanic	
While in the Vehicle Maintenance shop, we saw a used oil storage tank with a storage capacity between 125 and 150 gallons. At the time of the inspection, the tank was not labeled with the words "Used Oil." I told Mr. Smith the used oil regulations required all used oil storage units to be labeled with the words "Used Oil." Mr. Smith labeled the storage tank with the words "Used Oil" during the inspection.			

Photo(s)

1. [IMG_1611.jpg](#)
2. [IMG_1610.jpg](#)
3. [IMG_1607.jpg](#)
4. [IMG_1608.jpg](#)
5. [IMG_1609.jpg](#)

Building: Vehicle Maintenance Shop**Observation #:** JJ1-OB-002**Date:** 07/12/2023**Contains AOC:** Yes**Contains CBI:** No**Person Interviewed:** Justin Smith**Title:** Light Duty Mechanic

While still in the VMS, I asked Mr. Smith to show me where they accumulate waste aerosol cans and how they are managed. Mr. Smith explained that as they generate waste aerosol cans, they are punctured over the used oil storage tank using a hammer punch. He then said the punctured cans go into an oily waste bag. Mr. Smith told us the bags of oily waste are taken to the Oxbow Landfill for disposal.

I explained the regulations, requiring VSQGs to manage their waste properly. I told Mr. Smith that his facility's current method of puncturing the waste aerosol cans was not meeting that requirement. I suggested to Mr. Smith, that his facility might want to manage their waste aerosol cans as a universal waste and avoid the puncturing process.

Photo(s)

1. [IMG_1612.jpg](#)

Building: Vehicle Maintenance Shop**Observation #:** JJ1-OB-003**Date:** 07/12/2023**Contains AOC:** Yes**Contains CBI:** No**Person Interviewed:** Justin Smith**Title:** Light Duty Mechanic

While still in the VMS, I asked Mr. Smith about the generation of waste batteries from power tools and hand-held radios/communication devices. Mr. Smith told me those type of batteries are disposed of into the trash and taken to the Oxbow Landfill.

I suggested to Mr. Smith that their facility manage the waste batteries as universal waste.

SECTION III – RECORDS REVIEW

At the time of the inspection, the facility was a VSQG of hazardous waste and no records were reviewed.

SECTION IV – AREA OF CONCERN

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

Building: Vehicle Maintenance Shop	Area:	Sub-area:
JJ1-OB-001		
Used oil storage tank was not labeled with the words "Used Oil."	Regulations:	Sections:
Building: Vehicle Maintenance Shop	Area:	Sub-area:
JJ1-OB-002		
Waste aerosol cans they are punctured over the used oil storage tank using a hammer punch. The punctured cans go into an oily waste bag and are taken to the Oxbow Landfill for disposal.	Regulations:	Sections:
Building: Vehicle Maintenance Shop	Area:	Sub-area:
JJ1-OB-003		
Waste batteries (Lithium/Ni-Cad) from power tools and hand-held radios/communication devices are disposed of into the trash and taken to the Oxbow Landfill.	Regulations:	Sections:

SECTION V – CLOSING CONFERENCE AND FOLLOW UP

Closing Conference

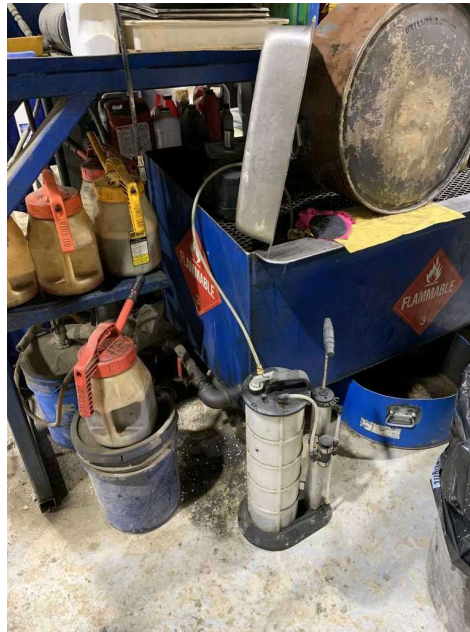
At the conclusion of the inspection, I conducted a closing conference with Mr. Smith. After Mr. Adams, Shop Manager was done with his phone call, I went up to his office and conducted a second closing conference with him too. I thanked Mr. Smith and Mr. Adams for their time and cooperation during the inspection and began a review of the areas of concern (listed in Section III – Areas of Concern) that I observed during the 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 documented violations.

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

SECTION VII – LIST OF APPENDICES

1. Photo Log

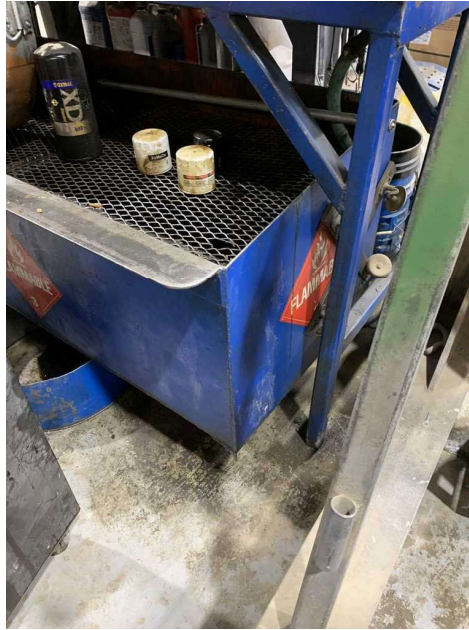
APPENDIX 1: PHOTO LOG



[Title]			IMG_1607.jpg
07/12/2023 02:07 PM	No CBI	No PII	Photographer: Jon Jones
Vehicle Maintenance Shop			70.21313611, -148.403825
Another view of the used oil storage tank, showing that it is not labeled with the words "Used Oil."			



[Title]			IMG_1608.jpg
07/12/2023 02:07 PM	No CBI	No PII	Photographer: Jon Jones
Vehicle Maintenance Shop			70.21308888, -148.40385555
Another view of the used oil storage tank, showing that it is not labeled with the words "Used Oil."			



[Title]			IMG_1609.jpg
07/12/2023 02:07 PM	No CBI	No PII	Photographer: Jon Jones
Vehicle Maintenance Shop			70.213075, -148.40386944
Another view of the used oil storage tank, showing that it is not labeled with the words "Used Oil."			



[Title]			IMG_1610.jpg
07/12/2023 02:07 PM	No CBI	No PII	Photographer: Jon Jones
Vehicle Maintenance Shop			70.21301388, -148.40402222
Another view of the used oil storage tank, showing that it is not labeled with the words "Used Oil."			



[Title]			IMG_1611.jpg
07/12/2023 02:08 PM	No CBI	No PII	Photographer: Jon Jones
Vehicle Maintenance Shop			70.21321111, -148.40374722
View of the used oil storage tank after being labeled with the words "Used Oil" during the inspection.			



[Title]			IMG_1612.jpg
07/12/2023 02:11 PM	No CBI	No PII	Photographer: Jon Jones
Vehicle Maintenance Shop			70.213075, -148.40394722
View of the hammer punch that is being used at the facility to puncture waste aerosol cans over the used oil tank.			