

INSPECTION REPORT

Inspection Entry Date/Time	07/09/2024 08:39 AM (AKT)	Announced: No
Inspection Exit Date/Time	07/09/2024 02:07 PM (AKT)	Access: Granted
Regulatory Program	Resource Conservation and Recovery Act (RCRA)	
Type of Inspection	Compliance Evaluation Inspection (CEI)	
Company Name	Alaska Railroad Corporation	
Facility or Site Name	Alaska Railroad Corporation	
Facility/Site Identifier	AKD981767403	
Facility/Site Physical Address	327 W Ship Creek Ave	
City, State, Zip Code	Anchorage, AK 99501	
County/Borough	N/A	
Generator Status	Small Quantity Generator (SQG)	
NAICS	482112 – Short Line Railroads	
Type of Operation	Transportation, railroads	
Geographic Coordinates	61.221744, -149.87957	
Mailing Address/Secondary Address	Matt Kelzenberg, Manager Environmental Operations/ Alaska Railroad PO Box 107500 Anchorage, AK 99510-7500 (907) 265-2384 kelzenbergm@akrr.com	
City, State, Zip Code	Anchorage, AK 99510-7500	
Permit Number (If Applicable)	N/A	
Lead Inspector:		
Jon Jones	Jones, Jon  Digitally signed by Jones, Jon Date: 2024.10.11 12:13:18 -08'00'	
	EPA Region 10	Jones.Jon@epa.gov (907) 271-6329
Supervisor Review:		
Matthew Quarterman	MATTHEW QUARTERMAN  Digitally signed by MATTHEW QUARTERMAN Date: 2024.10.11 14:06:28 -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: CEI

EPA Region 10 Lead Inspector, Jon Jones, arrived at the Alaska Railroad Corp Facility (the “Site” or “Facility”), located at 327 W Ship Creek Ave, Anchorage, AK 99501, at 08:39 AM (AKT) on 07/09/2024 for an unannounced

inspection. EPA Region 10 Lead Inspector presented credentials to and informed Matt Kelzenberg (Manager Environmental Operations) that this was an EPA Region 10 inspection to determine compliance with 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 2024.

This report is based on information supplied by Alaska Railroad Corp Facility representatives, observations made by the EPA Region 10 inspector, and records and reports maintained by the facility, 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
Inspector/Enforcement Officer/EPA REGION 10	Xiangyu Chu	(206) 553-2859	Chu.xiangyu@epa.gov	Yes	Yes
RCRA Inspector-in-training/ Alaska Department of Environmental Conservation (ADEC)	Vanessa Schmidt	(907) 269-4581	Vanessa.schmidt@alaska.gov	Yes	Yes
RCRA Inspector-in-training/ADEC	Sable McGovern	(907) 269-4556	Sable.mcgovern@alaska.gov	Yes	Yes
RCRA Inspector-in-training/ADEC	Emily Vannortwick	(907) 269-4580	Emily.vannortwick@alaska.gov	Yes	Yes
Field Safety Officer/ Alaska Railroad	Erick White	(907) 265-2691	Whitee@akrr.com	No	Yes
Hazardous Materials Specialist/ Alaska Railroad	Demario Jones	(907) 265-2435	Jonesd@akrr.com	No	Yes
Manager Environmental Operations/ Alaska Railroad	Matt Kelzenberg	(907) 265-2384	Kelzenbergm@akrr.com	Yes	Yes

Opening Conference

After arriving at the facility, Xiangyu Chu (EPA Inspector), Vanessa Schmidt (ADEC Inspector-in-training), Sable McGovern (ADEC Inspector-in-training), Emily Vannortwick (ADEC Inspector-in-training), and I were met by Matt Kelzenberg (Manager Environmental Operations). I presented him with my credentials, provided him with my

business card, and informed him of the purpose of the inspection. He brought us to a conference room within his office building and we began the opening conference.

During the opening conference, Mr. Kelzenberg explained the facility’s operations and described the facility’s waste streams. He stated that the facility is generally a very small quantity generator (VSQG), despite the SQG status listed in RCRAInfo. He reported that the only instances in which they reach SQG status is during changeouts. Because of this VSQG status and the small amounts of hazardous waste they generate, he reported that most of their waste goes to the landfill. I inquired on the process for sending waste to the landfill. Mr. Kelzenberg stated that to his knowledge this was applicable only to aerosol cans and paints, but he requested that we speak to Demario Jones (Hazardous Materials Specialist) to get more details. He also stated that there had not been many process changes within the facility since the last inspection in 2018. A change that he did note is that they had switched out the use of Ni-Cad batteries, so these were no longer present in large quantities at the facility.

When asked about the “transporter” status listed in RCRAInfo, Mr. Kelzenberg stated that they are not a transporter. He reported that they use Clean Harbors or Republic Services for large shipments of waste or send their waste to the landfill as mentioned prior. I asked about the two EPA ID numbers listed in RCRAInfo, one based at the facility address and another for a location on Viking Road. Mr. Kelzenberg stated that the Viking Road address is a completed cleanup site from 20 years ago in which sludge was being removed from retention ponds. He reported that there is nothing at that site currently. In relation to multiple EPA IDs, Mr. Kelzenberg also noted that they will occasionally lease a section of track within their yard to contractors that need to clean out their rail cars. He stated that to do this, companies will get their own EPA ID numbers but perform the cleaning itself on Alaska Railroad property. He noted that rail cars handling hazardous materials must be re-certified every 25 years and this is done by the rail car owners. To re-certify, owners cut into the rail car and inspect it, but they first must clean out the car by scrubbing it. He stated that the last time this was done at the facility was last summer. He noted that this does not occur yearly and that generally there is an average of 10 rail cars being cleaned at a time. He reported that Republic Services is a company that often does this. I requested records on this, and he stated that he would ask their real estate department for the track leases with EPA ID numbers.

Mr. Kelzenberg provided us with a facility map. We discussed the records we would need to review at the end of this inspection which included manifests, training, and weekly inspections. We were accompanied throughout the inspection by Mr. Kelzenberg, Mr. Jones, and Erick White (Field Safety Officer). We were not denied access to any part of the facility, and we were allowed to take photographs.

Facility/Site Information

What type of generator facility verified as?	SQG occasionally, VSQG more regularly
What type of generator facility notified?	SQG
Size of Facility	100 acres
Length of Facility at Location	100 years
Number of employees	700 during the summer, 500 year-round

Process Description

The Alaska Railroad Corp is a freight and passenger railroad company. Hazardous waste generated at this facility comes from the maintenance of locomotives, equipment, and facilities. Waste streams generated at this facility include aerosol cans, used oil, diesel, absorbent pads, batteries, petroleum products, contaminated debris from clean ups, and lamps.

During the inspection we examined the facility’s processes, hazardous waste management practices, generation points, and accumulation areas. We looked for wastes that facility representative had not yet identified or designated as hazardous. We also observed the facility’s universal waste management. Specifically, we inspected the areas of the facility listed below.

Building(s)

Building/Area/Sub-area	Process Description	Area of Concern
5K Used Oil Tank Building	N/A	Yes
Satellite Accumulation Area (SAA)	Used Oil	Yes
Boiler Plant BLDG 29	N/A	Yes
Outside Bldg 29 SAA	Miscellaneous waste containers	Yes
Central Accumulation Area (CAA)	Lamps, batteries, paints, aerosol cans, miscellaneous items awaiting waste determinations	Yes
General Repair Shop BLDG 27	N/A	Yes
SAA	Used oil	Yes
Car Shop BLDG 28	N/A	Yes
SAA	Aerosol cans	Yes
Diesel Shop	N/A	Yes
Center Aisle SAA	Used oil, aerosol cans	Yes
Oil Filter Crushing	Used oil, oil filters	Yes
Electric Rewind Shop	N/A	Yes
SAA	Aerosol cans, used oil	Yes
Heavy Equipment Shop	N/A	Yes
SAA	Aerosol cans	Yes
Wheelhouse	N/A	Yes
SAA	Aerosol cans, parts washer solvent	Yes

SECTION II – OBSERVATIONS

Building: Boiler Plant BLDG 29/ CAA			
Observation #: JJ1-OB-001	Date: 07/09/2024	Contains AOC: Yes	Contains CBI: No
Person(s) Interviewed: Matt Kelzenberg, Demario Jones, Erick White			
Title(s): Manager Environmental Operations, Hazardous Materials Specialist, Field Safety Officer			
This building contains the facility’s CAA and is also where their records are stored. Upon arriving, we reviewed some of the facility’s paperwork, specifically their waste tracking, and were introduced to Mr. Jones. Mr. Jones stated that he handles the hazardous waste generated at the facility exclusively. He reported that the month prior to the inspection the facility generated less than 150 pounds of hazardous waste and that the only			

hazardous waste on site at the time of the inspection was waste aerosol cans, of which he stated they had ~88 pounds. When asked how waste is disposed of, he stated that he brings it to the Eagle River Landfill. He stated that waste streams brought to the landfill for disposal includes aerosol cans, mini fridges and freezers, and asbestos. He had receipts for these drop offs which he presented to us. He reported that his last drop off to the landfill was last month. When asked about how waste batteries are handled, he stated that batteries, e-waste, ballasts, and bulbs go to Total Reclaim, and some batteries also go to Battery Plus and Batteries Specialists. He stated that Republic Services takes the facility’s solvents, used oil, and absorbents, and that Clean Harbors takes their sludge and antifreeze. He reported that they do not have waste from pesticides because they use these materials in totality whenever possible. He stated that they use an internal manifest system to track waste streams and that they keep logs of containers and wastes present in the CAA. We were also introduced to Mr. White, who was in Mr. Jones’s position prior.

At the time of the inspection, we observed two containers of used lamps that were not closed. We also observed that the universal waste labels associated with these containers were attached to the container stands, instead of the containers themselves. Mr. Jones closed these containers during the inspection and made note that they are normally kept closed. He stated he would attach the labels to the containers.

At the time of the inspection, we observed two used lamps sitting out on top of a used lamps container. Mr. Jones placed these lamps in the appropriate universal waste container and closed it. He noted that normally lamps go into the appropriate containers immediately and are not left out.

At the time of the inspection, we observed a used bulb in a container of batteries. Mr. Jones removed this bulb and placed it in the appropriate universal waste container.

At the time of the inspection, we observed one broken lamp in a trash can.

At the time of the inspection, we observed 10 containers stacked in a pile. These containers appeared to be waste paints based on the product label. We also observed two containers of lubricant and two containers of ‘black cement”. I asked Mr. Jones if these were waste. He stated that these materials arrived at the CAA two weeks ago and were waste, but he noted that he had yet to make a hazardous waste determination. We requested the waste determinations and safety data sheets (SDS) for these waste streams.

At the time of the inspection, we observed waste aerosol cans in an open wheeling cart labeled as “non-hazardous”. This container was not labeled as “hazardous waste”, nor did it have a hazard indicator, or an accumulation start date. We also observed a blue container with waste aerosol cans that was closed and labeled “empty aerosol cans”. This container was not labeled as “hazardous waste”, nor did it have a hazard indicator, or an accumulation start date. Mr. Jones stated that the blue container is used to place waste aerosol cans into the wheeling cart and is not meant to accumulate waste aerosol cans.

At the time of the inspection, we observed two waste aerosol cans sitting out on top of a bucket. Mr. Jones placed these into the appropriate hazardous waste container.

At the time of the inspection, we observed a container of NiCad batteries and a container of lithium batteries each with an accumulation start date of 3/20/23. This was over one year of accumulation at the time of the inspection. Mr. Jones reported that he believed these dates to be incorrect and he stated that the actual accumulation start dates were February 2024.

Building: Boiler Plant BLDG 29/ Outside BLDG 29 SAA			
Observation #: JJ1-OB-002	Date: 07/09/2024	Contains AOC: Yes	Contains CBI: No
Person(s) Interviewed: Matt Kelzenberg, Demario Jones, Erick White		Title(s): Manager Environmental Operations, Hazardous Materials Specialist, Field Safety Officer	

At the time of the inspection, we observed several miscellaneous containers of unknown materials outside of the CAA. This included a full 55-gallon container labeled "PF solvent used" and a tote labeled "bad", as well as an unlabeled blue container. Mr. Jones stated that he believed one of these containers to be a mix of oil and water and another to be a mix of diesel and water. He was unsure what the "PF solvent" was. Mr. Jones stated that he believed these materials to be wastes, but he noted that he had not yet made a hazardous waste determination. We requested the waste determinations and safety data sheets (SDS) for these waste streams.

Building: Car Shop BLDG 28/ SAA**Observation #:** JJ1-OB-003**Date:** 07/09/2024**Contains AOC:** Yes**Contains CBI:** No

Person(s) Interviewed: Matt Kelzenberg, Demario Jones, Erick White
Title(s): Manager Environmental Operations, Hazardous Materials Specialist, Field Safety Officer

At the time of the inspection, we observed a waste aerosol can in a container labeled "hazardous material". This container was closed but it was not labeled as "hazardous waste", nor did it have a hazard indicator.

Mr. Jones showed us a flammable locker in this building. He stated that these lockers are used to hold aerosol cans when they are a product. He reported that shop personnel decide when an aerosol can is empty and place it in the SAA container. This is then brought to the CAA where Mr. Jones makes the final determination on if they are a waste. He stated that often materials brought to him are indeed wastes.

Building: Wheelhouse/ SAA**Observation #:** JJ1-OB-004**Date:** 07/09/2024**Contains AOC:** Yes**Contains CBI:** No

Person(s) Interviewed: Matt Kelzenberg, Demario Jones, Erick White
Title(s): Manager Environmental Operations, Hazardous Materials Specialist, Field Safety Officer

At the time of the inspection, we observed a bucket and Mr. White told me it contained parts washer solvent sediment. This container was labeled with the words "hazardous waste" but was not marked with a hazard indicator. The log associated with this bucket stated that it had been onsite since 2/9/16.

Building: General Repair Shop BLDG 27/ SAA**Observation #:** JJ1-OB-005**Date:** 07/09/2024**Contains AOC:** Yes**Contains CBI:** No

Person(s) Interviewed: Matt Kelzenberg, Demario Jones, Erick White
Title(s): Manager Environmental Operations, Hazardous Materials Specialist, Field Safety Officer

At the time of the inspection, we observed two buckets and were told by Mr. Jones that they contained used oil but were not labeled with the words "used oil". We also observed two jugs and were told by Mr. Jones that they contained used oil but were not labeled with the words "used oil". Mr. Jones reported that these containers were likely waiting to be transferred to the main used oil container for storage.

At the time of the inspection, we observed a parts washer with used oil in a collection container that was not labeled with the words "used oil". This machine was not running at the time of the inspection. Shop personnel reported that they take sludge and used oil from the parts washer, but they were unclear of where the sludge from this machine was sent. We requested additional information on this process, specifically where the sludge is sent for disposal.

At the time of the inspection, we observed what appeared to be an old oil spill on the floor by the parts washer that had not been cleaned.

Mr. Jones stated that he would label all of the containers holding used oil with the words “used oil” and that they would clean the oil spill.

Building: Electric Rewind Shop/ SAA

Observation #: JJ1-OB-006 **Date:** 07/09/2024 **Contains AOC:** Yes **Contains CBI:** No

Person(s) Interviewed: Matt Kelzenberg, Demario Jones, Erick White **Title(s):** Manager Environmental Operations, Hazardous Materials Specialist, Field Safety Officer

At the time of the inspection, we observed multiple waste aerosol cans in a container that was labeled “hazardous material”. This container was closed but it was not labeled as “hazardous waste”, nor did it have a hazard indicator. This container had a pre-made label stating that it was emptied daily. Upon inquiring about this, Mr. Jones confirmed that these containers are indeed emptied every 24-32 hours and that the amount present in this container represented an average accumulation over 24 hours for an SAA in the facility.

At the time of the inspection, we observed, and were told by Mr. White, that the two drip containers held used oil, but were not labeled with the words “used oil”.

At the time of the inspection, we observed a paint sprayer in this building. I inquired about the product used in this machine and Mr. Jones stated that he was unsure. Mr. White reported that this product was analyzed five years prior and was determined to be nonhazardous. He stated that he would send these analytical results.

Building: Diesel Shop/ Center Aisle SAA

Observation #: JJ1-OB-007 **Date:** 07/09/2024 **Contains AOC:** Yes **Contains CBI:** No

Person(s) Interviewed: Matt Kelzenberg, Demario Jones, Erick White **Title(s):** Manager Environmental Operations, Hazardous Materials Specialist, Field Safety Officer

At the time of the inspection, we observed a shelving unit with a container of oily waste at the bottom. This container was not labeled with the words “used oil”.

At the time of the inspection, we observed a container of what appeared to be a mix of sludge, water, and oil. This container was not labeled with the words “used oil”. Mr. Jones stated that this material was from cleaning tracks, but he was unsure of what exactly the sludge was composed of. Mr. White stated that he believed the sludge to be dirt and that the container likely contained dirt, water, and a small amount of oil. We requested that they determine what this container contained and provide us with the results.

At the time of the inspection, we observed two containers and were told by Mr. Jones that they contained used oil, but they were not labeled with the words “used oil”.

At the time of the inspection, we observed waste aerosol cans in a container labeled “hazardous material”. This container was closed but it was not labeled as “hazardous waste”, nor did it have a hazard indicator.

Building: Diesel Shop/ Oil Filter Crushing SAA

Observation #: JJ1-OB-008 **Date:** 07/09/2024 **Contains AOC:** Yes **Contains CBI:** No

Person(s) Interviewed: Matt Kelzenberg, Demario Jones, Erick White **Title(s):** Manager Environmental Operations, Hazardous Materials Specialist, Field Safety Officer

This area of the Diesel Shop is where used oil filters are crushed. Mr. Jones stated that the process to crush oil filters is as such: oil filters are placed in a cart to drain and then crushed in the oil filter crusher. When crushed, oil drains into a bucket which is then emptied into one of two carts that are then taken to the CAA.

At the time of the inspection, we observed three carts labeled with the words “waste oil”. One cart contained draining oil filters and the other two contained used oil. We also observed a bucket collecting used oil from the filter crusher which was not labeled with the words “used oil”.

Building: Heavy Equipment Shop/ SAA			
Observation #: JJ1-OB-009	Date: 07/09/2024	Contains AOC: Yes	Contains CBI: No
Person(s) Interviewed: Matt Kelzenberg, Demario Jones, Erick White		Title(s): Manager Environmental Operations, Hazardous Materials Specialist, Field Safety Officer	
At the time of the inspection, we observed waste aerosol cans in a container labeled “hazardous material”. This container was closed but it was not labeled as “hazardous waste”, nor did it have a hazard indicator.			

Building: 5K Oil Tank/ SAA			
Observation #: JJ1-OB-010	Date: 07/09/2024	Contains AOC: Yes	Contains CBI: No
Person(s) Interviewed: Matt Kelzenberg, Demario Jones, Erick White		Title(s): Manager Environmental Operations, Hazardous Materials Specialist, Field Safety Officer	
At the time of the inspection, we observed a bucket containing what appeared to be used oil. Mr. Jones told us that this was a used oil container, but it was not labeled with the words “used oil”.			

SECTION III – RECORDS REVIEW

Record: Inspections		AOC: Yes
Ref #: N/A	Reviewed By: Vanessa Schmidt	Reviewed Date: 07/09/24
At the time of the inspection, three years (2021-2024) of weekly inspections of the CAA were reviewed. There were found to be 29 missing inspections for the following weeks: 2021: 7/25/21-7/31/21 8/8/21-8/14/21 8/22/21-8/28/21 8/29/21-9/4/21 9/12/21-9/18/21 9/26/21-10/2/21 10/3/21-10/9/21 11/21/21-11/27/21 2022: 4/17/22-4/23/22 4/24/22-4/30/22 6/5/22-6/11/22 6/12/22-6/18/22 6/19/22-6/25/22 6/26/22-7/2/22 7/3/22-7/9/22 8/7/22-8/13/22 9/11/22-9/17/22 10/23/22-10/29/22 11/6/22-11/12/22 11/20/22-11/26/22 12/25/22-12/31/22 2023: 5/14/23-5/20/23 7/2/23-7/8/23 7/9/23-7/15/23 10/8/23-10/14/23 10/15/23-10/21/23 10/22/23-10/28/23 10/29/23-11/4/23 12/24/23-12/30/23 Mr. Jones reported that missing these inspections was not deliberate. He stated that he is the only employee who can conduct the weekly inspections so when he is unavailable or out of office, they do not get done. Mr. White confirmed that this was the case when he was in this position as well. I recommended that they find an alternate who could perform these inspections in situations where the Hazardous Materials Specialist is unavailable to ensure that they are completed weekly as required. They were both amenable to this idea.		
Record: Manifests		AOC: No
Ref #: N/A	Reviewed By: Vanessa Schmidt	Reviewed Date: 07/09/24
At the time of the inspection, manifests were reviewed. Mr. Jones stated that there was only one manifest for the last three years (2021-2024) and this was in January 2024. He reiterated that waste is otherwise disposed of at the Eagle River landfill, and he provided receipts of this. All documents reviewed appeared to support a generator status of a VSQG.		
Record: Training Records		AOC: No
Ref #: N/A	Reviewed By: Vanessa Schmidt	Reviewed Date: 07/09/24
At the time of the inspection, we requested that Mr. Jones send us copies of facility training plans and the log for training received by facility personnel. He stated that he would send this following the inspection.		

SECTION IV – AREA OF CONCERN

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

Building: Boiler Plant BLDG 29	Area: CAA	Sub-area:
JJ1-OB-001		

Two waste lamp containers not closed	Regulation:	Sections:
Building: Boiler Plant BLDG 29	Area: CAA	Sub-area:
JJ1-OB-001		
Two waste lamps containers with universal waste labels not affixed to containers	Regulation:	Sections:
Building: Boiler Plant BLDG 29	Area: CAA	Sub-area:
JJ1-OB-001		
Two waste lamps not contained in appropriate universal waste container	Regulation:	Sections:
Building: Boiler Plant BLDG 29	Area: CAA	Sub-area:
JJ1-OB-001		
One waste bulb in a container of batteries, not contained in appropriate universal waste container	Regulation:	Sections:
Building: Boiler Plant BLDG 29	Area: CAA	Sub-area:
JJ1-OB-001		
One broken lamp in a trash can, not contained in appropriate universal waste container	Regulation:	Sections:
Building: Boiler Plant BLDG 29	Area: CAA	Sub-area:
JJ1-OB-001		
Two containers of waste batteries with greater than 1 year in storage	Regulation:	Sections:
Building: Boiler Plant BLDG 29	Area: CAA	Sub-area:
JJ1-OB-001		
Waste aerosol cans managed as non-hazardous waste	Regulation:	Sections:
Building: Boiler Plant BLDG 29	Area: CAA	Sub-area:
JJ1-OB-001		

Waste aerosol can container not closed	Regulation:	Sections:
Building: Boiler Plant BLDG 29	Area: CAA	Sub-area:
JJ1-OB-001		
Two waste aerosol can containers not labeled with words “hazardous waste”, a hazard indicator, nor an accumulation start date.	Regulation:	Sections:
Building: Boiler Plant BLDG 29	Area: CAA	Sub-area:
JJ1-OB-001		
Several waste containers without a hazardous waste determination made at the point of generation	Regulation:	Sections:
Building: Boiler Plant BLDG 29	Area: CAA	Sub-area:
JJ1-OB-001		
Two waste aerosol cans not contained in appropriate hazardous waste container	Regulation:	Sections:
Building: Boiler Plant BLDG 29	Area: Outside Bldg 29 SAA	Sub-area:
JJ1-OB-002		
Several waste containers without a hazardous waste determination made at the point of generation	Regulation:	Sections:
Building: Car Shop BLDG 28	Area: SAA	Sub-area:
JJ1-OB-003		
One container of waste aerosol cans not labeled with words “hazardous waste” nor a hazard indicator	Regulation:	Sections:
Building: General Repair Shop BLDG 27	Area: SAA	Sub-area:
JJ1-OB-005		
Five containers of used oil, not labeled “used oil”	Regulation:	Sections:
Building: General Repair Shop BLDG 27	Area: SAA	Sub-area:

JJ1-OB-005

Oil spill observed on floor, not cleaned up

Regulation:**Sections:****Building:** Electric Rewind Shop**Area:** SAA**Sub-area:****JJ1-OB-006**

One container of waste aerosol cans not labeled with words "hazardous waste" nor a hazard indicator

Regulation:**Sections:****Building:** Electric Rewind Shop**Area:** SAA**Sub-area:****JJ1-OB-006**

Two containers of used oil, not labeled "used oil"

Regulation:**Sections:****Building:** Diesel Shop**Area:** Center Aisle SAA**Sub-area:****JJ1-OB-007**

Four containers of used oil, not labeled "used oil"

Regulation:**Sections:****Building:** Diesel Shop**Area:** Center Aisle SAA**Sub-area:****JJ1-OB-008**

One container of waste aerosol cans not labeled with words "hazardous waste" nor a hazard indicator

Regulation:**Sections:****Building:** Diesel Shop**Area:** Oil Filter Crushing SAA**Sub-area:****JJ1-OB-008**

Four containers of used oil, not labeled "used oil"

Regulation:**Sections:****Building:** Heavy Equipment Shop**Area:** SAA**Sub-area:****JJ1-OB-009**

One container of waste aerosol cans not labeled with words "hazardous waste" nor a hazard indicator

Regulation:**Sections:****Building:** 5K Oil Tank**Area:** SAA**Sub-area:****JJ1-OB-010**

One container of used oil, not labeled “used oil”	Regulation:	Sections:
Building: Wheelhouse	Area: SAA	Sub-area:
JJ1-OB-004		
One container of hazardous waste, not marked with a hazard indicator	Regulation:	Sections:
Record: Inspections		
N/A		
Missing 29 weekly inspections	Regulation:	Sections:

SECTION V – CLOSING CONFERENCE AND FOLLOW UP

Closing Conference

Following the review of paperwork, I held a closing conference to discuss the findings of my inspection. This was attended by Matt Kelzenberg, Erick White, and Demario Jones I reiterated that the purpose of the inspection was to perform a routine hazardous waste compliance inspection and I thanked the facility staff for their time and cooperation. I reviewed the areas of concern that were identified during the inspection. This included:

- Universal waste containers not properly closed
- Universal waste labels not affixed to universal waste containers
- Universal waste not contained in universal waste containers
- Failure to make a hazardous waste determination made at the point of generation
- Hazardous waste managed as non-hazardous waste
- Hazardous waste containers without appropriate hazardous waste labeling in CAA (“hazardous waste”, hazard indictor, accumulation start date)
- Hazardous waste containers not properly closed
- Hazardous waste not contained in hazardous waste containers
- Universal waste accumulated for over a year
- Hazardous waste containers without labels including words “hazardous waste” and a hazard indicator in SAAs
- Used oil containers not labeled with words “used oil”
- An oil spill not being cleaned up
- Missing weekly inspections

The ability to address the areas of concern described and send photos was discussed. I also reiterated the information requested as follow up during the inspection. I answered any questions they had and explained the follow up process.

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



Closed waste lamp container in CAA			IMG-20240709095350535073413.jpg
07/09/24	No CBI	No PII	N/A
Boiler Plant BLDG 29/ CAA			N/A
Waste lamp container after being closed.			



Open waste lamp container in CAA			IMG-20240709093431343166406.jpg
07/09/24	No CBI	No PII	N/A
Boiler Plant BLDG 29/ CAA			N/A
Open waste lamp container with lamps inside and label affixed to stand, not container.			



Open waste lamp container in CAA			IMG-20240709093431343167507.jpg
07/09/24	No CBI	No PII	N/A
Boiler Plant BLDG 29/ CAA			N/A
Open waste lamp container with lamps inside and label affixed to stand, not container.			



Waste lamps not in container in CAA			IMG-20240709093543354348819.jpg
07/09/24	No CBI	No PII	N/A
Boiler Plant BLDG 29/ CAA			N/A
Waste lamps sitting in the lid of the waste lamp container, not properly contained.			



Open waste lamp container in CAA			IMG-20240709093925392538512.jpg
07/09/24	No CBI	No PII	N/A
Boiler Plant BLDG 29/ CAA			N/A
Lamps inside of an open waste lamp container.			



Broken lamp in a trash can in CAA			IMG-20240709095022502269968.jpg
07/09/24	No CBI	No PII	N/A
Boiler Plant BLDG 29/ CAA			N/A
Broken lamp in a trash can, not properly contained.			



Open waste lamp container in CAA			IMG-20240709095334533471072.jpg
07/09/24	No CBI	No PII	N/A
Boiler Plant BLDG 29/ CAA			N/A
Open waste lamp container with lamps inside and label affixed to stand, not container.			



Open waste lamp container in CAA			IMG-20240709095337533782175.jpg
07/09/24	No CBI	No PII	N/A
Boiler Plant BLDG 29/ CAA			N/A
Open waste lamp container with lamps inside and lid sitting nearby.			



Universal waste lithium batteries in CAA with accumulation over one year			IMG-202407091004064666326.jpg
07/09/24	No CBI	No PII	N/A
Boiler Plant BLDG 29/ CAA			N/A
Universal waste lithium batteries accumulated for over one year.			



Open waste lamp container in CAA			IMG-20240709095431543168403.jpg
07/09/24	No CBI	No PII	N/A
Boiler Plant BLDG 29/ CAA			N/A
Open waste lamp container with lamps inside and lid hanging off.			



Closed waste lamp container in CAA			IMG-20240709095449544994993.jpg
07/09/24	No CBI	No PII	N/A
Boiler Plant BLDG 29/ CAA			N/A
Waste lamp container with lamps inside, closed.			



Waste bulb in container of batteries in CAA			IMG-20240709095728572834723.jpg
07/09/24	No CBI	No PII	N/A
Boiler Plant BLDG 29/ CAA			N/A
Waste bulb in a container of batteries, not properly contained.			



Waste bulb in container of batteries in CAA			IMG-20240709095731573137486.jpg
07/09/24	No CBI	No PII	N/A
Boiler Plant BLDG 29/ CAA			N/A
Waste bulb in a container of batteries, not properly contained.			



Universal waste NiCad batteries in CAA with accumulation over one year			IMG-2024070910015115150328.jpg
07/09/24	No CBI	No PII	N/A
Boiler Plant BLDG 29/ CAA			N/A
Universal waste NiCad batteries accumulated for over one year.			



Universal waste NiCad batteries in CAA with accumulation over one year			IMG-2024070910022922958057.jpg
07/09/24	No CBI	No PII	N/A
Boiler Plant BLDG 29/ CAA			N/A
Universal waste NiCad batteries accumulated for over one year.			



Universal waste NiCad batteries in CAA with accumulation over one year			IMG-2024070910023523559299.jpg
07/09/24	No CBI	No PII	N/A
Boiler Plant BLDG 29/ CAA			N/A
Universal waste NiCad batteries accumulated for over one year.			



Unknown containers in CAA			IMG-20240709101558155869381.jpg
07/09/24	No CBI	No PII	N/A
Boiler Plant BLDG 29/ CAA			N/A
Containers of unknown materials without hazardous waste determinations.			



Universal waste NiCad batteries in CAA with accumulation over one year			IMG-2024070910043843859674.jpg
07/09/24	No CBI	No PII	N/A
Boiler Plant BLDG 29/ CAA			N/A
Universal waste Ni-Cad batteries accumulated for over one year.			



Universal waste lithium batteries in CAA with accumulation over one year			IMG-2024070910044344361174.jpg
07/09/24	07/09/24	07/09/24	N/A
Boiler Plant BLDG 29/ CAA			N/A
Universal waste lithium batteries accumulated for over one year.			



Waste aerosol can accumulation in containers in CAA			IMG-2024070910091491473678.jpg
07/09/24	No CBI	No PII	N/A
Boiler Plant BLDG 29/ CAA			N/A
Waste aerosol can accumulation in CAA			



Waste aerosol can accumulation in open container in CAA			IMG-2024070910091791761667.jpg
07/09/24	No CBI	No PII	N/A
Boiler Plant BLDG 29/ CAA			N/A
Waste aerosol can container labeled as non-hazardous waste.			



Waste aerosol can accumulation in open container in CAA			IMG-2024070910092092089391.jpg
07/09/24	No CBI	No PII	N/A
Boiler Plant BLDG 29/ CAA			N/A
Waste aerosol cans in bag, in an open container labeled as “non-hazardous”.			



Waste aerosol can accumulation in open container in CAA			IMG-20240709101220122055279.jpg
07/09/24	No CBI	No PII	N/A
Boiler Plant BLDG 29/ CAA			N/A
Waste aerosol cans in open container labeled “non-hazardous waste”.			



Waste aerosol can accumulation in container in CAA			IMG-20240709101223122358898.jpg
07/09/24	No CBI	No PII	N/A
Boiler Plant BLDG 29/ CAA			N/A
Waste aerosol can accumulation in container labeled “empty aerosol cans”.			



"Black cement" containers in CAA			IMG-2024070910220322384129.jpg
07/09/24	No CBI	No PII	N/A
Boiler Plant BLDG 29/ CAA			N/A
Two containers of "black cement" in unknown materials pile without a hazardous waste determination.			



Unknown containers in CAA			IMG-20240709101618161875285.jpg
07/09/24	No CBI	No PII	N/A
Boiler Plant BLDG 29/ CAA			N/A
Containers of unknown materials without hazardous waste determinations.			



Unknown containers in CAA			IMG-202407091016231623101017.jpg
07/09/24	No CBI	No PII	N/A
Boiler Plant BLDG 29/ CAA			N/A
Containers of unknown materials without hazardous waste determinations.			



Unknown containers in CAA			IMG-20240709101630163069358.jpg
07/09/24	No CBI	No PII	N/A
Boiler Plant BLDG 29/ CAA			N/A
Containers of unknown materials without hazardous waste determinations.			



Waste aerosol cans not contained in CAA			IMG-2024070910170717791964.jpg
07/09/24	No CBI	No PII	N/A
Boiler Plant BLDG 29/ CAA			N/A
Two waste aerosol cans not in appropriate container.			



Waste aerosol cans not contained in CAA			IMG-20240709101754175461182.jpg
07/09/24	No CBI	No PII	N/A
Boiler Plant BLDG 29/ CAA			N/A
Two waste aerosol cans not in appropriate container.			



Unknown containers in CAA			IMG-20240709102031203180944.jpg
07/09/24	No CBI	No PII	N/A
Boiler Plant BLDG 29/ CAA			N/A
Containers of unknown materials without hazardous waste determinations.			



Unknown containers in CAA			IMG-2024070910210321394717.jpg
07/09/24	No CBI	No PII	N/A
Boiler Plant BLDG 29/ CAA			N/A
Containers of unknown materials without hazardous waste determinations.			



Unknown containers outside of CAA			IMG-20240709103009309101190.jpg
07/09/24	No CBI	No PII	N/A
Boiler Plant BLDG 29/ Outside BLDG 29 SAA			N/A
Unknown containers outside of CAA without hazardous waste determinations.			



"Black cement" containers in CAA			IMG-20240709102234223481031.jpg
07/09/24	No CBI	No PII	N/A
Boiler Plant BLDG 29/ CAA			N/A
Two containers of "black cement" in unknown materials pile without a hazardous waste determination.			



Unknown containers in CAA			IMG-20240709102258225872482.jpg
07/09/24	No CBI	No PII	N/A
Boiler Plant BLDG 29/ CAA			N/A
Containers of unknown materials without hazardous waste determinations.			



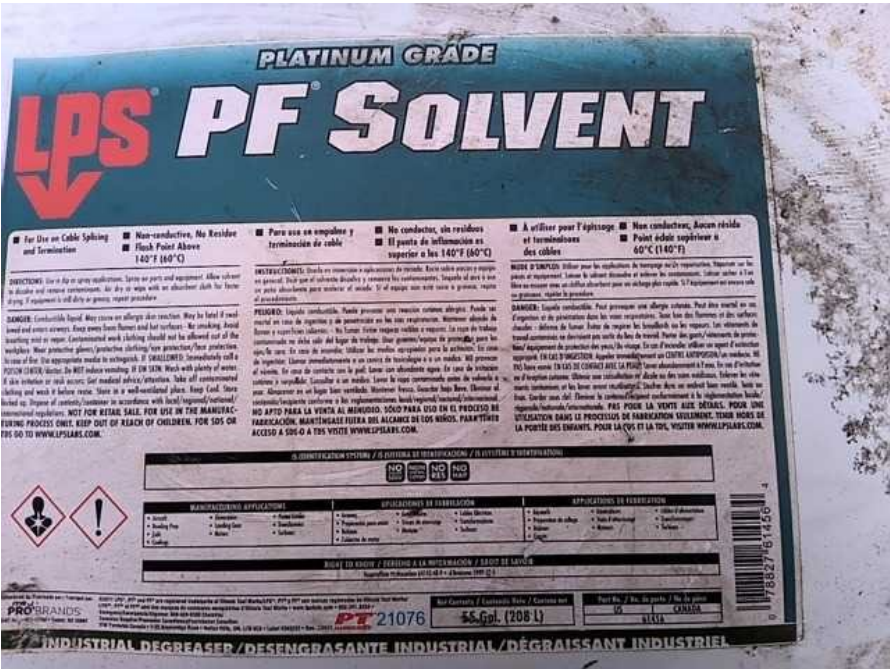
Unknown containers outside of CAA			IMG-202407091026432643117435.jpg
07/09/24	No CBI	No PII	N/A
Boiler Plant BLDG 29/ Outside BLDG 29 SAA			N/A
Unknown containers outside of CAA without hazardous waste determinations.			



Unknown containers outside of CAA			IMG-202407091026502650106465.jpg
07/09/24	No CBI	No PII	N/A
Boiler Plant BLDG 29/ Outside BLDG 29 SAA			N/A
Unknown containers outside of CAA without hazardous waste determinations.			



Container of PF Solvent outside of CAA			IMG-20240709102653265376271.jpg
07/09/24	No CBI	No PII	N/A
Boiler Plant BLDG 29/ Outside BLDG 29 SAA			N/A
Container of PF Solvent outside of CAA without a hazardous waste determination.			



Label on container of PF Solvent outside of CAA			IMG-202407091027482748140039.jpg
07/09/24	No CBI	No PII	N/A
Boiler Plant BLDG 29/ Outside BLDG 29 SAA			N/A
Label on container of PF Solvent outside of CAA without a hazardous waste determination.			



Unknown container outside of CAA			IMG-20240709103002302101814.jpg
07/09/24	No CBI	No PII	N/A
Boiler Plant BLDG 29/ Outside BLDG 29 SAA			N/A
Unknown container outside of CAA without a hazardous waste determination.			



Waste aerosol cans in container in CAA			IMG-20240709104810481081433.jpg
07/09/24	No CBI	No PII	N/A
Boiler Plant BLDG 29/ CAA			N/A
Waste aerosol cans in container in CAA.			



Unknown containers outside of CAA			IMG-20240709103024302492162.jpg
07/09/24	No CBI	No PII	N/A
Boiler Plant BLDG 29/ Outside BLDG 29 SAA			N/A
Unknown containers outside of CAA without hazardous waste determinations.			



Unknown container outside of CAA			IMG-202407091033343334118344.jpg
07/09/24	No CBI	No PII	N/A
Boiler Plant BLDG 29/ Outside BLDG 29 SAA			N/A
Unknown container outside of CAA labeled with word “BAD” without a hazardous waste determination.			



Unknown container outside of CAA			IMG-202407091033373337120164.jpg
07/09/24	No CBI	No PII	N/A
Boiler Plant BLDG 29/ Outside BLDG 29 SAA			N/A
Unknown container outside of CAA labeled with word “BAD” without a hazardous waste determination.			



Waste aerosol accumulation container in Car Shop SAA			IMG-20240709104024402497162.jpg
07/09/24	No CBI	No PII	N/A
Car Shop BLDG 28/ SAA			N/A
Waste aerosol accumulation container labeled “hazardous material”.			



Waste aerosol accumulation container in Car Shop SAA			IMG-20240709104031403193496.jpg
07/09/24	No CBI	No PII	N/A
Car Shop BLDG 28/ SAA			N/A
Waste aerosol accumulation container with a waste aerosol can present inside, labeled “hazardous material”.			



Waste aerosol accumulation container in Car Shop SAA			IMG-20240709104036403689454.jpg
07/09/24	No CBI	No PII	N/A
Car Shop BLDG 28/ SAA			N/A
Waste aerosol accumulation container labeled “hazardous material”.			



Waste aerosol accumulation container in Car Shop SAA			IMG-20240709104040404078313.jpg
07/09/24	No CBI	No PII	N/A
Car Shop BLDG 28/ SAA			N/A
Waste aerosol accumulation container labeled “hazardous material”.			



Bucket of hazardous waste in Wheelhouse SAA			IMG-202407091100000092062.jpg
07/09/24	No CBI	No PII	N/A
Wheelhouse/ SAA			N/A
Bucket of hazardous waste without a hazard indicator.			



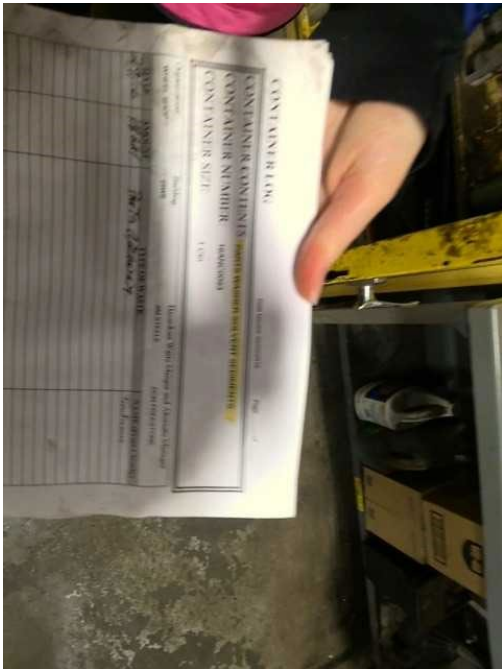
Waste aerosol accumulation container in Car Shop SAA			IMG-20240709104813481388584.jpg
07/09/24	No CBI	No PII	N/A
Car Shop BLDG 28/ SAA			N/A
Waste aerosol accumulation container labeled “hazardous material”; however, no waste aerosol cans present in container at time of inspection.			



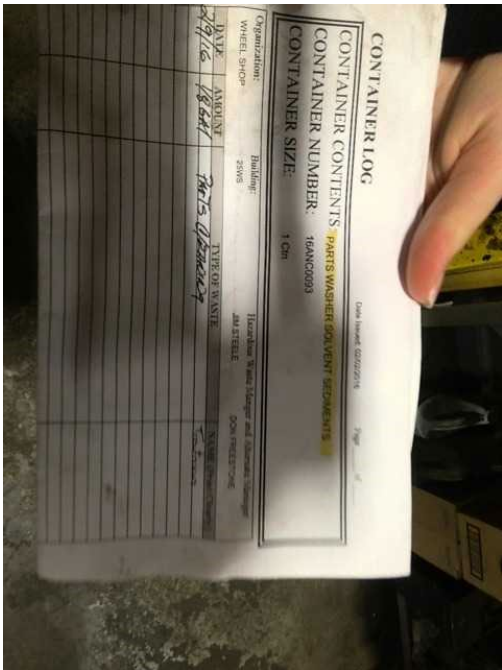
Waste aerosol accumulation container in Car Shop SAA			IMG-20240709104930493078773.jpg
07/09/24	No CBI	No PII	N/A
Car Shop BLDG 28/ SAA			N/A
Waste aerosol accumulation container labeled “hazardous material”; however, no waste aerosol cans present in container at time of inspection.			



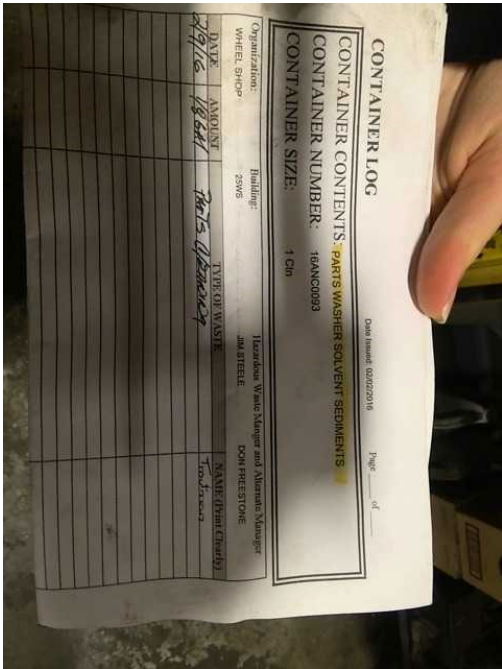
Bucket of hazardous waste in Wheelhouse SAA			IMG-20240709105912591265309.jpg
07/09/24	No CBI	No PII	N/A
Wheelhouse/ SAA			N/A
Bucket of hazardous waste without a hazard indicator.			



Log for bucket of hazardous waste in Wheelhouse SAA			IMG-20240709105948594861670.jpg
07/09/24	No CBI	No PII	N/A
Wheelhouse/ SAA			N/A
Log for bucket of hazardous waste without a hazard indicator.			



Log for bucket of hazardous waste in Wheelhouse SAA			IMG-20240709105948594871328.jpg
07/09/24	No CBI	No PII	N/A
Wheelhouse/ SAA			N/A
Log for bucket of hazardous waste without a hazard indicator.			



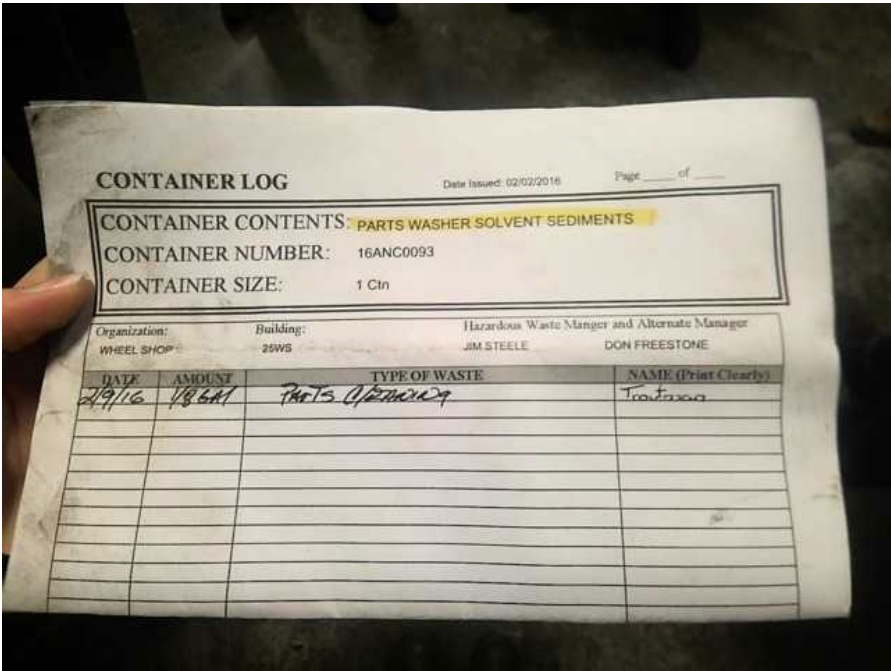
Log for bucket of hazardous waste in Wheelhouse SAA			IMG-20240709105949594973171.jpg
07/09/24	No CBI	No PII	N/A
Wheelhouse/ SAA			N/A
Log for bucket of hazardous waste without a hazard indicator.			



Bucket of hazardous waste in Wheelhouse SAA			IMG-20240709105957595787475.jpg
07/09/24	No CBI	No PII	N/A
Wheelhouse/ SAA			N/A
Bucket of hazardous waste without a hazard indicator.			



Parts washer used oil collection container in General Repair Shop SAA			IMG-202407091112441244111583.jpg
07/09/24	No CBI	No PII	N/A
General Repair Shop BLDG 27/ SAA			N/A
Used oil collection container on parts washer, not labeled "used oil".			



Log for bucket of hazardous waste in Wheelhouse SAA			IMG-2024070911001601673356.jpg
07/09/24	No CBI	No PII	N/A
Wheelhouse/ SAA			N/A
Log for bucket of hazardous waste without a hazard indicator.			



Buckets of used oil in General Repair Shop SAA			IMG-2024070911083983999988.jpg
07/09/24	No CBI	No PII	N/A
General Repair Shop BLDG 27/ SAA			N/A
Two buckets of used oil, not labeled “used oil”.			



Buckets of used oil in General Repair Shop SAA			IMG-2024070911084784775541.jpg
07/09/24	No CBI	No PII	N/A
General Repair Shop BLDG 27/ SAA			N/A
Two buckets of used oil, not labeled “used oil”.			



Buckets of used oil in General Repair Shop SAA			IMG-2024070911085585583517.jpg
07/09/24	No CBI	No PII	N/A
General Repair Shop BLDG 27/ SAA			N/A
Two buckets of used oil, not labeled “used oil”.			



Buckets of used oil in General Repair Shop SAA			IMG-20240709111032103295383.jpg
07/09/24	No CBI	No PII	N/A
General Repair Shop BLDG 27/ SAA			N/A
Two buckets of used oil, not labeled “used oil”.			



Jugs of used oil in General Repair Shop SAA			IMG-2024070911111111191032.jpg
07/09/24	No CBI	No PII	N/A
General Repair Shop BLDG 27/ SAA			N/A
Two jugs of used oil, not labeled “used oil”.			



Jugs of used oil in General Repair Shop SAA			IMG-202407091111151115105608.jpg
07/09/24	No CBI	No PII	N/A
General Repair Shop BLDG 27/ SAA			N/A
Two jugs of used oil, not labeled “used oil”.			



Used oil drip pan in Electric Rewind Shop SAA			IMG-20240709113121312180696.jpg
07/09/24	No CBI	No PII	N/A
Electric Rewind Shop/ SAA			N/A
Drip pan of used oil, not labeled “used oil”.			



Parts washer used oil collection container in General Repair Shop SAA			IMG-202407091112511251103717.jpg
07/09/24	No CBI	No PII	N/A
General Repair Shop BLDG 27/ SAA			N/A
Used oil collection container on parts washer, not labeled “used oil”.			



Buckets of used oil in General Repair Shop SAA			IMG-202407091113161316100224.jpg
07/09/24	No CBI	No PII	N/A
General Repair Shop BLDG 27/ SAA			N/A
Two buckets of used oil, not labeled “used oil”.			



Buckets of used oil in General Repair Shop SAA			IMG-202407091113171317102617.jpg
07/09/24	No CBI	No PII	N/A
General Repair Shop BLDG 27/ SAA			N/A
Two buckets of used oil, not labeled “used oil”.			



Waste aerosol accumulation container in Electric Rewind Shop SAA			IMG-20240709111752175285018.jpg
07/09/24	No CBI	No PII	N/A
Electric Rewind Shop/ SAA			N/A
Waste aerosol accumulation container labeled “hazardous material”.			



Waste aerosol accumulation container in Electric Rewind Shop SAA			IMG-2024070911180318373870.jpg
07/09/24	No CBI	No PII	N/A
Electric Rewind Shop/ SAA			N/A
Waste aerosol accumulation container labeled “hazardous material” with multiple waste aerosol cans inside.			



Waste aerosol accumulation container in Electric Rewind Shop SAA			IMG-20240709111821182187816.jpg
07/09/24	No CBI	No PII	N/A
Electric Rewind Shop/ SAA			N/A
Waste aerosol accumulation container labeled “hazardous material”.			



Waste aerosol accumulation container in Electric Rewind Shop SAA			IMG-20240709111826182684428.jpg
07/09/24	No CBI	No PII	N/A
Electric Rewind Shop/ SAA			N/A
Waste aerosol accumulation container labeled “hazardous material” with multiple waste aerosol cans inside.			



Shelving unit with oily waste at bottom in Diesel Shop Center Aisle SAA			IMG-20240709113723372388463.jpg
07/09/24	No CBI	No PII	N/A
Diesel Shop/ Center Aisle SAA			N/A
Shelving unit with oily waste at bottom, not labeled "used oil".			



Used oil drip pan in Electric Rewind Shop SAA			IMG-20240709113149314988767.jpg
07/09/24	No CBI	No PII	N/A
Electric Rewind Shop/ SAA			N/A
Drip pan of used oil, not labeled "used oil".			



Used oil drip pan in Electric Rewind Shop SAA			IMG-202407091133493349101388.jpg
07/09/24	No CBI	No PII	N/A
Electric Rewind Shop/ SAA			N/A
Drip pan of used oil, not labeled “used oil”.			



Used oil drip pan in Electric Rewind Shop SAA			IMG-20240709113350335098142.jpg
07/09/24	No CBI	No PII	N/A
Electric Rewind Shop/ SAA			N/A
Drip pan of used oil, not labeled “used oil”.			



Shelving unit with oily waste at bottom in Diesel Shop Center Aisle SAA			IMG-20240709113639363983050.jpg
07/09/24	No CBI	No PII	N/A
Diesel Shop/ Center Aisle SAA			N/A
Shelving unit with oily waste at bottom, not labeled “used oil”.			



Shelving unit with oily waste at bottom in Diesel Shop Center Aisle SAA			IMG-20240709113640364089811.jpg
07/09/24	No CBI	No PII	N/A
Diesel Shop/ Center Aisle SAA			N/A
Shelving unit with oily waste at bottom, not labeled “used oil”.			



Shelving unit with oily waste at bottom in Diesel Shop Center Aisle SAA			IMG-20240709113643364376899.jpg
07/09/24	No CBI	No PII	N/A
Diesel Shop/ Center Aisle SAA			N/A
Shelving unit with oily waste at bottom, not labeled “used oil”.			



Shelving unit with oily waste at bottom in Diesel Shop Center Aisle SAA			IMG-20240709113644364481298.jpg
07/09/24	No CBI	No PII	N/A
Diesel Shop/ Center Aisle SAA			N/A
Shelving unit with oily waste at bottom, not labeled “used oil”.			



Used oil container in Diesel Shop Center Aisle SAA			IMG-20240709114604464108815.jpg
07/09/24	No CBI	No PII	N/A
Diesel Shop/ Center Aisle SAA			N/A
Used oil container, not labeled “used oil”.			



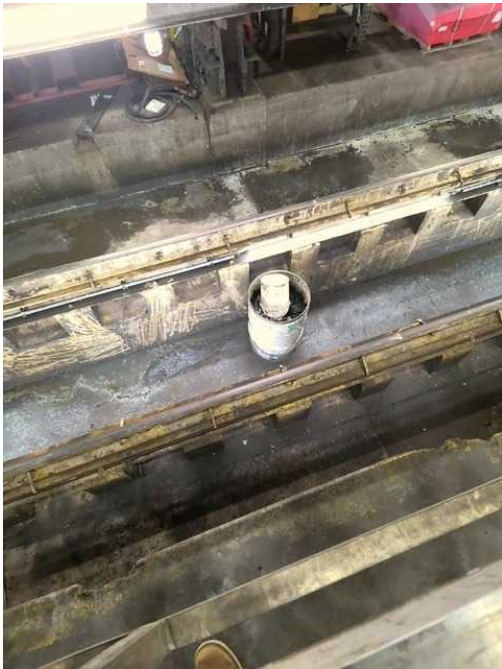
Waste aerosol accumulation container in Diesel Shop Center Aisle SAA			IMG-2024070911380538563998.jpg
07/09/24	No CBI	No PII	N/A
Diesel Shop/ Center Aisle SAA			N/A
Waste aerosol accumulation container labeled as “hazardous material”.			



Waste aerosol accumulation container in Diesel Shop Center Aisle SAA			IMG-2024070911380938977968.jpg
07/09/24	No CBI	No PII	N/A
Diesel Shop/ Center Aisle SAA			N/A
Waste aerosol accumulation container labeled as “hazardous material”.			



Waste aerosol accumulation container in Diesel Shop Center Aisle SAA			IMG-20240709113819381979970.jpg
07/09/24	No CBI	No PII	N/A
Diesel Shop/ Center Aisle SAA			N/A
Waste aerosol accumulation container labeled “hazardous material” with multiple waste aerosol cans inside.			



Container of sludge, oil, and water in Diesel Shop Center Aisle SAA			IMG-202407091143354335102422.jpg
07/09/24	No CBI	No PII	N/A
Diesel Shop/ Center Aisle SAA			N/A
Container of sludge, water, and oil, not labeled “used oil”.			



Container of sludge, oil, and water in Diesel Shop Center Aisle SAA			IMG-2024070911440044063979.jpg
07/09/24	No CBI	No PII	N/A
Diesel Shop/ Center Aisle SAA			N/A
Container of sludge, water, and oil, not labeled “used oil”.			



Container of sludge, oil, and water in Diesel Shop Center Aisle SAA			IMG-20240709114406446857100.jpg
07/09/24	No CBI	No PII	N/A
Diesel Shop/ Center Aisle SAA			N/A
Container of sludge, water, and oil, not labeled “used oil”.			



Used oil container in Diesel Shop Center Aisle SAA			IMG-20240709114559455995999.jpg
07/09/24	No CBI	No PII	N/A
Diesel Shop/ Center Aisle SAA			N/A
Used oil container, not labeled “used oil”.			



Carts of used oil from oil filter crushing in Diesel Shop SAA			IMG-20240709115539553991931.jpg
07/09/24	No CBI	No PII	N/A
Diesel Shop/ Oil Filter Crushing SAA			N/A
Carts used to remove used oil after oil filters are crushed, labeled “waste oil”.			



Used oil container in Diesel Shop Center Aisle SAA			IMG-202407091146124612116236.jpg
07/09/24	No CBI	No PII	N/A
Diesel Shop/ Center Aisle SAA			N/A
Used oil container, not labeled “used oil”.			



Used oil collection container in Diesel Shop Oil Filter Crushing SAA			IMG-20240709115216521684351.jpg
07/09/24	No CBI	No PII	N/A
Diesel Shop/ Oil Filter Crushing SAA			N/A
Container used to collect used oil when crushing used oil filters, not labeled “used oil”.			



Used oil collection container in Diesel Shop Oil Filter Crushing SAA			IMG-20240709115219521999265.jpg
07/09/24	No CBI	No PII	N/A
Diesel Shop/ Oil Filter Crushing SAA			N/A
Container used to collect used oil when crushing used oil filters, not labeled “used oil”.			



Used oil container in Diesel Shop Center Aisle SAA			IMG-2024070911461046101424127.jpg
07/09/24	No CBI	No PII	N/A
Diesel Shop/ Center Aisle SAA			N/A
Used oil container, not labeled “used oil”.			



Used oil collection container in Diesel Shop Oil Filter Crushing SAA			IMG-20240709115223522394047.jpg
07/09/24	No CBI	No PII	N/A
Diesel Shop/ Oil Filter Crushing SAA			NA
Container used to collect used oil when crushing used oil filters, not labeled “used oil”.			



Used oil filter crushing machine in Diesel Shop Oil Filter Crushing SAA			IMG-202407091152285228107485.jpg
07/09/24	No CBI	No PII	N/A
Diesel Shop/ Oil Filter Crushing SAA			N/A
Machine used to crush used oil filters.			



Carts of used oil from oil filter crushing in Diesel Shop SAA			IMG-202407091155365536113918.jpg
07/09/24	No CBI	No PII	N/A
Diesel Shop/ Oil Filter Crushing SAA			N/A
Carts used to drain oil filters and remove used oil after oil filters are crushed, labeled “waste oil”.			



Waste aerosol accumulation container in Heavy Equipment Shop SAA			IMG-202407091205145141072249.jpg
07/09/24	No CBI	No PII	N/A
Heavy Equipment Shop/ SAA			N/A
Waste aerosol accumulation container labeled “hazardous material”.			



Carts of used oil from oil filter crushing in Diesel Shop SAA			IMG-202407091155415541104019.jpg
07/09/24	No CBI	No PII	N/A
Diesel Shop/ Oil Filter Crushing SAA			N/A
Carts used to remove used oil after oil filters are crushed, labeled “waste oil”.			



Cart of used oil filters in Diesel Shop Oil Filter Crushing SAA			IMG-20240709115543554389953.jpg
07/09/24	No CBI	No PII	N/A
Diesel Shop/ Oil Filter Crushing SAA			N/A
Cart of draining used oil filters, labeled “waste oil”.			



Used oil filters in Diesel Shop Oil Filter Crushing SAA			IMG-202407091155475547105351.jpg
07/09/24	No CBI	No PII	N/A
Diesel Shop/ Oil Filter Crushing SAA			N/A
Container of used oil filters.			



Used oil filters in Diesel Shop Oil Filter Crushing SAA			IMG-20240709115554555487644.jpg
07/09/24	No CBI	No PII	N/A
Diesel Shop/ Oil Filter Crushing SAA			N/A
Container of used oil filters.			



Bucket of used oil in 5K Oil Tank SAA			IMG-2024070911580458480521.jpg
07/09/24	No CBI	No PII	N/A
5K Oil Tank/ SAA			N/A
Bucket of used oil, not labeled “used oil”.			



Bucket of used oil in 5K Oil Tank SAA			IMG-2024070911580758780759.jpg
07/09/24	No CBI	No PII	N/A
5K Oil Tank/ SAA			N/A
Bucket of used oil, not labeled “used oil”.			



Bucket of used oil in 5K Oil Tank SAA			IMG-20240709115812581279777.jpg
07/09/24	No CBI	No PII	N/A
5K Oil Tank/ SAA			N/A
Bucket of used oil, not labeled “used oil”.			



Waste aerosol accumulation container in Heavy Equipment Shop SAA			IMG-202407091205225221284665.jpg
07/09/24	No CBI	No PII	N/A
Heavy Equipment Shop/ SAA			N/A
Waste aerosol accumulation container labeled “hazardous material”, with multiple waste aerosol cans inside.			

APPENDIX 2: DOCUMENT LOG

Document Type	Document Name	Contains CBI	Contains PII	Uploaded By	Date Received
Facility Map	AK Railroad Map .pdf	No	No	Jon Jones	08/01/2024