

INSPECTION REPORT

Inspection Entry Date/Time	03/07/2023 08:20 AM (AKT)	Announced: No
Inspection Exit Date/Time	03/07/2023 11:04 AM (AKT)	Access: Granted
Regulatory Program	RCRA	
Type of Inspection	CEI - Compliance Evaluation Inspection	
Company Name	Lowe's Home Center, LLC	
Facility or Site Name	Lowes Of Fairbanks #1985	
Facility/Site Identifier	AKR000207159	
Facility/Site Physical Address	425 Merhar Avenue	
City, State, Zip Code	Fairbanks, AK 99701	
County/Borough	Fairbanks North Star Borough	
Generator Status	Small Quantity Generator (SQG)	
NAICS	444110 – Home Centers	
Type of Operation	Do-it-yourself Home Center	
Geographic Coordinates	64.858023, -147.701529	
Mailing Address/Secondary Address	Corey Proulx, Assistant Store Manager corey.j.proulx@store.lowes.com 425 Merhar Avenue Fairbanks, AK 99701	
City, State, Zip Code	Fairbanks, AK 99701	
Permit Number (If Applicable)	Not Applicable	
Lead Inspector:		
Jon Jones		
	EPA Region 10	Jones.Jon@epa.gov (907) 271-6329
Supervisor Review:		
Jen Sullivan		
	EPA Region 10	Sullivan.Jennifer.A@epa.gov (206) 553-6978

SECTION I – INTRODUCTION

Site Entry and Purpose of the Inspection

Type of inspection: CEI - Compliance Evaluation Inspection

EPA Region 10 Lead Inspector, Jon Jones, arrived at the Lowes of Fairbanks #1985 Facility (the “Site” or “Facility”), located at 425 Merhar Avenue, Fairbanks, AK 99701, at 08:20 AM (AKT) on 03/07/2023 for an unannounced inspection. EPA Region 10 Lead Inspector presented credentials to and informed Kyle Olson 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). The inspection was conducted as part of a Core Program requirement for FY 2023.

This report is based on information supplied by Lowes Of Fairbanks #1985 Facility representatives, observations made by the EPA Region 10 inspector, and records and reports maintained by the facility and its HQ including, but not limited to: direct observations made by the EPA Region 10 Inspector(s), photographs taken by EPA Region 10 inspector(s), physical evidence collected by the EPA Region 10 inspector(s), measurements or samples taken by EPA Region 10 inspector(s), verbal or written statements made by information supplied by the facility representatives during or subsequent to the on-site Inspection, and materials, processes, data, photographs, or documents shown, demonstrated, or submitted to the EPA Region 10 inspector(s) by the facility representatives during or subsequent to the on-site Inspection. In addition, information gathered prior to or subsequent to the Inspection from a review of USEPA, State, and public records may be included in this report.

Attendees

Title/Organization	Name	Phone	Email	Opening Conf.	Closing Conf.
Lead Inspector/EPA Region 10	Jon Jones	(907) 271-6329	Jones.Jon@epa.gov	Yes	Yes
Back End Supervisor/Lowe's of Fairbanks #1985	Kyle Olson		1278292@store.lowes.com	Yes	Yes
Hazardous Waste Program Specialist/ADEC	Ashley Streveler	(907) 269-4556	ashley.streveler@alaska.gov	Yes	Yes
Assistant Store Manager/Lowe's of Fairbanks #1985	Corey Proulx	(907) 451-4700	corey.j.proulx@store.lowes.com	No	Yes

Opening Conference

Shortly after arriving at Lowe's, we were taken to the facility backroom where I held the opening conference. I presented my inspector credentials to and informed Mr. Kyle Olson, Back End Supervisor, that this was an EPA Region 10 inspection to determine compliance with Resource Conservation and Recovery Act (RCRA).

During the opening conference, I explained that the focus of the RCRA inspection was to identify types of wastes generated, points of waste generation, methods of waste management, and review relevant documents.

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

Facility/Site Information

Number of employees	Approximately 160 to 180 employees
Length of Facility at Location	Since 2008
Operating Hours	6:00 am to 10:00 pm, Monday through Saturday and 7:00 am to 8:00 pm on Sunday
Safety Training Provided to	No

Inspector(s)?	
Size of Facility	115, 400 square feet
What type of generator facility notified?	Small Quantity Generator (SQG)
What type of generator facility verified as?	Small Quantity Generator (SQG) verified by facility personnel
Weather Conditions	Cold and cloudy

Process Description

During the opening conference, Mr. Olson told us the wastes generated at the facility were generated either due to product being damaged as it enters the store through receiving, damaged on the shelf at the store, or customer returns that cannot be resold.

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

Building(s)

Building/Area/Sub-area	Process Description	Area of Concern
Main Building		Yes
Central Accumulation Area (CAA)	Hazardous waste accumulation	No
Return to Manufacturing Area (RTM)	Accumulation of universal waste lamps and batteries and waste aerosol satellite area	Yes

SECTION II – OBSERVATIONS

Building: Main Building/Return to Manufacturing Area (RTM)			
Observation #: JJ1-OB-001	Date: 03/07/2023	Contains AOC: Yes	Contains CBI: No
Person Interviewed: Kyle Olson		Title: Back End Supervisor	
While inspecting the RTM area, I saw one sealed waste lead-acid battery and six waste Lithium batteries. At the time of the inspection, the seven waste batteries were not labeled with either the words "Universal Waste - Batteries," "Waste Batteries," or "Used Batteries."			
Photo(s)			
1. IMG_0517.jpg			
2. IMG_0518.jpg			
3. IMG_0538.jpg			

Building: Main Building/Return to Manufacturing Area (RTM)			
Observation #: JJ1-OB-002	Date: 03/07/2023	Contains AOC: Yes	Contains CBI: No
Person Interviewed: Kyle Olson		Title: Back End Supervisor	
While still inspecting the RTM, I saw four boxes that held eight-foot waste fluorescent lamps. At the time of the			

Inspection Date(s):

03/07/2023 - 03/07/2023

inspection, the four boxes of eight-foot waste fluorescent lamps were not labeled with either the words "Universal Waste - Lamps," "Waste Lamps," or "Used Lamps." One of the four boxes of waste fluorescent lamps was also not closed.

Photo(s)

1. [IMG_0519.jpg](#)
2. [IMG_0520.jpg](#)

Building: Main Building/Return to Manufacturing Area (RTM)

Observation #: JJ1-OB-003

Date: 03/07/2023

Contains AOC: Yes

Contains CBI: No

Person Interviewed: Kyle Olson

Title: Back End Manager

While still in the RTM area, I saw three boxes that held four-foot waste fluorescent lamps. Two of the three boxes were not labeled, and one was labeled "Universal Waste - Light Bulbs." I also saw a small plastic tub that held waste fluorescent "U-shaped" lamps and CFL's that was also labeled "Universal Waste - Light Bulbs." I saw an additional three boxes of waste lamps that had been returned by a customer. The three boxes were labeled with the word "Trash." At the time of the inspection, all seven four containers that held four-foot waste fluorescent lamps, "U-shaped" lamps, and CFL's were not labeled with either the phrase "Universal Waste - Lamps," "Waste Lamps," or "Used Lamps."

Photo(s)

1. [IMG_0521.jpg](#)
2. [IMG_0522.jpg](#)
3. [IMG_0523.jpg](#)
4. [IMG_0524.jpg](#)
5. [IMG_0525.jpg](#)
6. [IMG_0526.jpg](#)
7. [IMG_0527.jpg](#)
8. [IMG_0528.jpg](#)
9. [IMG_0529.jpg](#)
10. [IMG_0530.jpg](#)
11. [IMG_0539.jpg](#)
12. [IMG_0540.jpg](#)
13. [IMG_0541.jpg](#)
14. [IMG_0542.jpg](#)

Building: Main Building/Return to Manufacturing Area (RTM)

Observation #: JJ1-OB-004

Date: 03/07/2023

Contains AOC: Yes

Contains CBI: No

Person Interviewed: Kyle Olson

Title: Back End Supervisor

While still in the RTM area, I saw a plastic trash receptacle that was being used as a satellite accumulation container to collect waste aerosol cans. The container was labeled as "Non - RCRA Regulated Waste" and marked with a hazard indicator of "Flammable." The container was dated 1/31/2023, but after a discussion with Mr. Olson it was determined that the container was being used as a satellite container. At the time of the

inspection, the satellite container of waste aerosol cans was not closed, as the lid was not attached or snapped down onto the container. The satellite container was also not labeled with the words "Hazardous Waste."

Photo(s)

1. [IMG_0533.jpg](#)
2. [IMG_0534.jpg](#)
3. [IMG_0535.jpg](#)
4. [IMG_0536.jpg](#)
5. [IMG_0537.jpg](#)

Building: Main Building/Central Accumulation Area (CAA)

Observation #: JJ1-OB-005

Date: 03/07/2023

Contains AOC: No

Contains CBI: No

Person Interviewed: Kyle Olson

Title: Back End Supervisor

The facility's CAA is located outside, behind the RTM area. I inspected the waste in accumulation and did not identify any areas of concern while at the CAA.

SECTION III – RECORDS REVIEW

Record: Manifests

AOC: Yes

Ref #: JJ1-RR-001

Reviewed By: Jon Jones

Reviewed Date: 03/07/2023

During the inspection, I reviewed the facility's hazardous waste manifests covering the period from September 2020 through the end of January 2023. During my inspection of these manifests, I saw five manifests for hazardous waste that was shipped from the facility without being signed by the generator or their designated representative.

The following hazardous waste manifests were not signed by the generator or their designated representative:

<u>Manifest #</u>	<u>Date of shipment</u>
004899344FLE	12/14/21
004899349FLE	12/14/21
004899348FLE	12/14/21
004899345FLE	12/14/21
004899278FLE	12/14/21

I downloaded a copy of the manifests, listed above, except for 004899278FLE, from RCRAInfo, showing that they had not been signed by the generator or their designated representative. Manifest 004899278FLE was not available in RCRAInfo.

The facility also did not have the copy of these manifests on-site, listed above, that had been signed by the designated facility.

Document(s)

1. 004899344FLE-2-8-2022-6-16-10-PM.pdf
2. 004899345FLE-2-8-2022-6-25-12-PM.pdf
3. 004899348FLE-2-7-2022-6-58-22-PM.pdf
4. 004899349FLE-2-7-2022-7-24-14-PM.pdf

Photo(s)

1. [IMG_0543.jpg](#)
2. [IMG_0544.jpg](#)
3. [IMG_0545.jpg](#)
4. [IMG_0546.jpg](#)
5. [IMG_0547.jpg](#)
6. [IMG_0548.jpg](#)
7. [IMG_0549.jpg](#)
8. [IMG_0550.jpg](#)
9. [IMG_0551.jpg](#)
10. [IMG_0552.jpg](#)
11. [IMG_0553.jpg](#)
12. [IMG_0554.jpg](#)
13. [IMG_0555.jpg](#)
14. [IMG_0556.jpg](#)
15. [IMG_0557.jpg](#)

Record: Preparedness and Prevention**AOC:** Yes**Ref #:** JJ1-RR-002**Reviewed By:** Jon Jones**Reviewed Date:** 03/07/2023

At the time of the inspection, the facility did not have emergency information posted next to a phone.

Following the inspection, I sent a sample emergency information sheet to Mr. Olson to post at the facility. I asked him to follow-up with a photo of this posted emergency information. At the time this inspection report was written, this information had not been received.

Record: Inspections**AOC:** Yes**Ref #:** JJ1-RR-003**Reviewed By:** Jon Jones**Reviewed Date:** 03/07/2023

At the time of the inspection, the facility was unable to provide documentation of weekly hazardous waste inspections for the 3-year period of March 2020 through March 2023.

At the end of the inspection, I requested that these inspection logs be sent to me for review. At the time this inspection report was completed, this information had not been received.

Record: Ensure applicable employees are trained – SQG**AOC:** Yes**Ref #:** JJ1-RR-004**Reviewed By:** Jon Jones**Reviewed Date:** 03/07/2023

At the time of the inspection, Mr. Olson said that there were approximately 11 Lowe's employees that required training. During the inspection, training records for these employees was not available for inspection. The content of the training was also not available for review.

At the end of the inspection, I asked Mr. Olson to provide this information. At the time this inspection report was completed, this information had not been received.

Record: Manifests

AOC: Yes

Ref #: JJ1-RR-005

Reviewed By: Jon Jones

Reviewed Date: 03/07/2023

During my inspection of the facility's hazardous waste manifests, I saw that the facility did not have a copy of the following manifests on-site that had been signed by the designated facility:

Manifest # Date of shipment

004899335FLE 9/10/21

004899333FLE 9/10/21

004899332FLE 9/10/21

004899331FLE 9/10/21

004899334FLE 9/10/21

004899347FLE 9/10/21

000384263JJK 9/4/20

000384264JJK 9/4/20

000384265JJK 9/4/20

000384266JJK 9/4/20

002636067PSC 1/21/20

Photo(s)

1. [IMG_0558.jpg](#)

2. [IMG_0559.jpg](#)

SECTION IV – AREA OF CONCERN

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

Building: Main Building	Area: Return to Manufacturing Area (RTM)	Sub-area:
JJ1-OB-001		
Seven waste batteries were not labeled with either the words "Universal Waste - Batteries," "Waste Batteries," or "Used Batteries."	Regulation:	Sections:
Building: Main Building	Area: Return to Manufacturing Area (RTM)	Sub-area:

JJ1-OB-002

Four boxes of eight-foot waste fluorescent lamps were not labeled with either the words "Universal Waste - Lamps," "Waste Lamps," or "Used Lamps." One of the four boxes of waste fluorescent lamps was also not closed.	Regulation:	Sections:
Building: Main Building	Area: Return to Manufacturing Area (RTM)	Sub-area:

JJ1-OB-003

Four containers that held four-foot waste fluorescent lamps, "U - shaped" lamps, and CFL's were not labeled with either the phrase "Universal Waste - Lamps," "Waste Lamps," or "Used Lamps."	Regulation:	Sections:
Building: Main Building	Area: Return to Manufacturing Area (RTM)	Sub-area:

JJ1-OB-004

A satellite container of waste aerosol cans was not closed, as the lid was not attached or snapped down onto the container. The satellite container was also not labeled with the words "Hazardous Waste."	Regulation:	Sections:
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Record: Manifests**JJ1-RR-001**

The following hazardous waste manifests were not signed by the generator or their designated representative: <table><tr><th><u>Manifest #</u></th><th><u>Date of shipment</u></th></tr><tr><td>004899344FLE</td><td>12/14/21</td></tr><tr><td>004899349FLE</td><td>12/14/21</td></tr><tr><td>004899348FLE</td><td>12/14/21</td></tr><tr><td>004899345FLE</td><td>12/14/21</td></tr></table>	<u>Manifest #</u>	<u>Date of shipment</u>	004899344FLE	12/14/21	004899349FLE	12/14/21	004899348FLE	12/14/21	004899345FLE	12/14/21	Regulation:	Sections:
<u>Manifest #</u>	<u>Date of shipment</u>											
004899344FLE	12/14/21											
004899349FLE	12/14/21											
004899348FLE	12/14/21											
004899345FLE	12/14/21											

004899278FLE 12/14/21 The facility also did not have the copy of these manifests, listed above, that had been signed by the designated facility.		
Record: Preparedness and Prevention		
JJ1-RR-002		
The facility did not have emergency information posted next to a phone.	Regulation:	Sections:
Record: Inspections		
JJ1-RR-003		
The facility was unable to provide documentation of weekly hazardous waste inspections for the 3-year period of March 2020 through March 2023.	Regulation:	Sections:
Record: Ensure applicable employees are trained – SQG		
JJ1-RR-004		
During the inspection, training records for these employees was not available for inspection. The content of the training was also not available for review.	Regulation:	Sections:
Record: Manifests		
JJ1-RR-005		
During my inspection of the facility's hazardous waste manifests, I saw that the facility did not have a copy of the following manifests on-site that had been signed by the designated facility: <u>Manifest #</u> <u>Date of shipment</u> 004899335FLE 9/10/21 004899333FLE 9/10/21 004899332FLE 9/10/21 004899331FLE 9/10/21	Regulation:	Sections:

004899334FLE	9/10/21		
004899347FLE	9/10/21		
000384263JJK	9/4/20		
000384264JJK	9/4/20		
000384265JJK	9/4/20		
000384266JJK	9/4/20		
002636067PSC	1/21/20		

SECTION V – CLOSING CONFERENCE AND FOLLOW UP

Closing Conference

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

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

SECTION VII – LIST OF APPENDICES

- 1. Photo Log
- 2. Document Log

APPENDIX 1: PHOTO LOG



[Title]			IMG_0517.jpg
03/07/2023 08:55 AM	No CBI	No PII	Photographer: Jon Jones
Main Building/Return to Manufacturing Area (RTM)			64.856225, -147.69589166
View of a sealed lead-acid battery that is seen here not labeled with either the phrase "Universal Waste - Battery," "Waste Battery," or "Used Battery."			



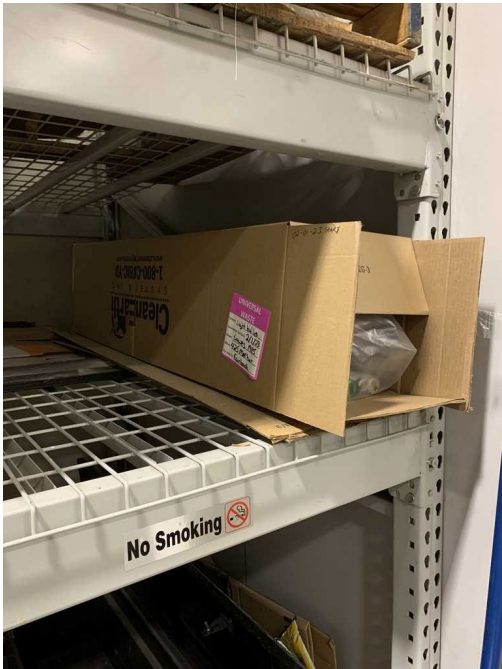
[Title]			IMG_0518.jpg
03/07/2023 08:55 AM	No CBI	No PII	Photographer: Jon Jones
Main Building/Return to Manufacturing Area (RTM)			64.85616944, -147.69590833
View of six waste Lithium batteries that are not labeled with either the phrase "Universal Waste - Battery," "Waste Battery," or "Used Battery."			



[Title]			IMG_0519.jpg
03/07/2023 09:09 AM	No CBI	No PII	Photographer: Jon Jones
Main Building/Return to Manufacturing Area (RTM)			64.85599444, -147.696075
View of three boxes, containing eight-foot waste fluorescent lamps that are seen here not labeled with either the phrase "Universal Waste - Lamps," "Waste Lamps," or "Used Lamps."			



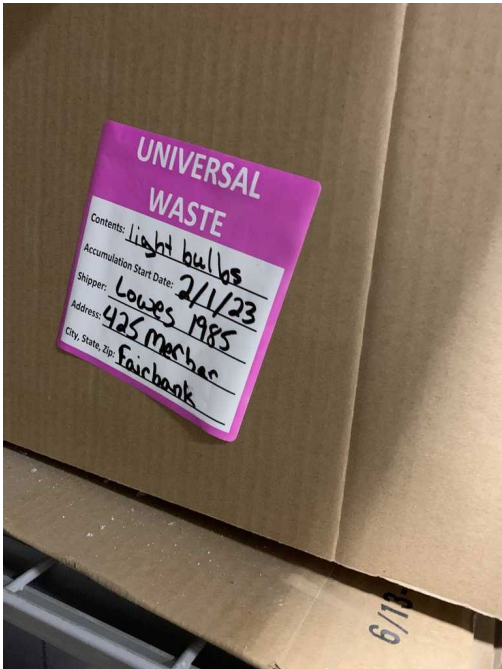
[Title]			IMG_0520.jpg
03/07/2023 09:09 AM	No CBI	No PII	Photographer: Jon Jones
Main Building/Return to Manufacturing Area (RTM)			64.85584999, -147.69578611
View of a fourth box containing eight-foot waste fluorescent lamps that is not closed or labeled with either the phrase "Universal Waste - Lamps," "Waste Lamps," or "Used Lamps."			



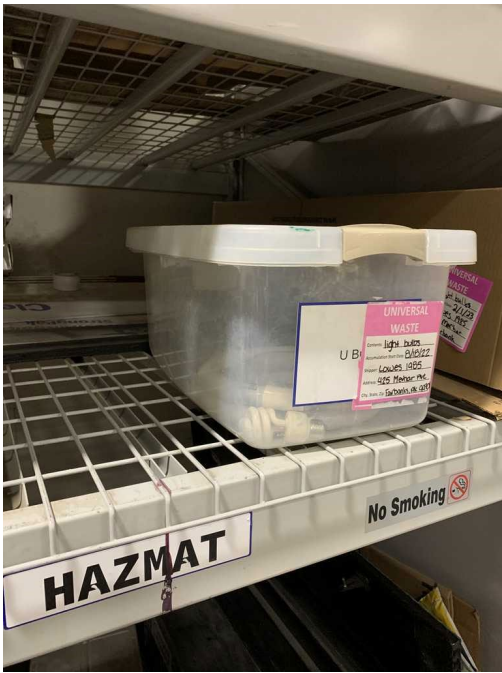
[Title]			IMG_0521.jpg
03/07/2023 09:10 AM	No CBI	No PII	Photographer: Jon Jones
Main Building/Return to Manufacturing Area (RTM)			64.85581111, -147.6958
View of a box containing four-foot waste fluorescent lamps that is not closed and not labeled with either the phrase "Universal Waste - Lamps," "Waste Lamps," or "Used Lamps."			



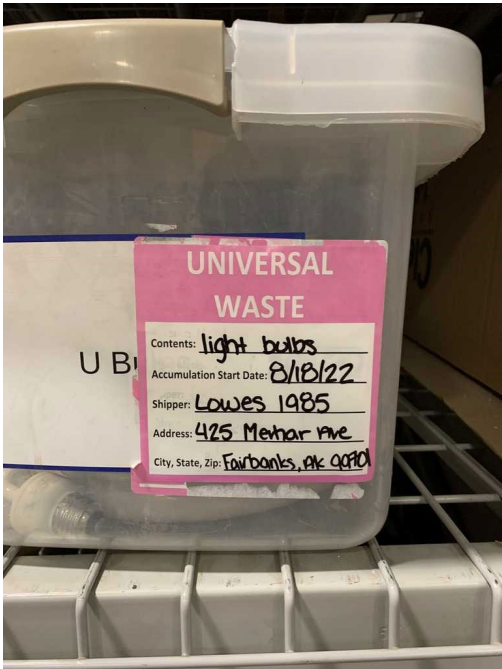
[Title]			IMG_0522.jpg
03/07/2023 09:10 AM	No CBI	No PII	Photographer: Jon Jones
Main Building/Return to Manufacturing Area (RTM)			64.85575, -147.69589166
Close-up view of the waste fluorescent lamps seen in the container from the previous photo (IMG_0521).			



[Title]			IMG_0523.jpg
03/07/2023 09:10 AM	No CBI	No PII	Photographer: Jon Jones
Main Building/Return to Manufacturing Area (RTM)			64.85572777, -147.69589166
Close-up view of the label on the open container of waste lamps seen in photo IMG_0521.			



[Title]			IMG_0524.jpg
03/07/2023 09:10 AM	No CBI	No PII	Photographer: Jon Jones
Main Building/Return to Manufacturing Area (RTM)			64.85574444, -147.69587777
View of container, holding waste lamps, that is not labeled with either the phrase "Universal Waste - Lamps," "Waste Lamps," or "Used Lamps."			



[Title]			IMG_0525.jpg
03/07/2023 09:10 AM	No CBI	No PII	Photographer: Jon Jones
Main Building/Return to Manufacturing Area (RTM)			64.85574444, -147.69587777
Close-up view of the label on the container of waste lamps seen in the previous photo (IMG_0524).			



[Title]			IMG_0526.jpg
03/07/2023 09:10 AM	No CBI	No PII	Photographer: Jon Jones
Main Building/Return to Manufacturing Area (RTM)			64.85573611, -147.69590833
View of two additional boxes, containing four-foot waste fluorescent lamps, that are not labeled with either the phrase "Universal Waste - Lamps," "Waste Lamps," or :Used Lamps."			



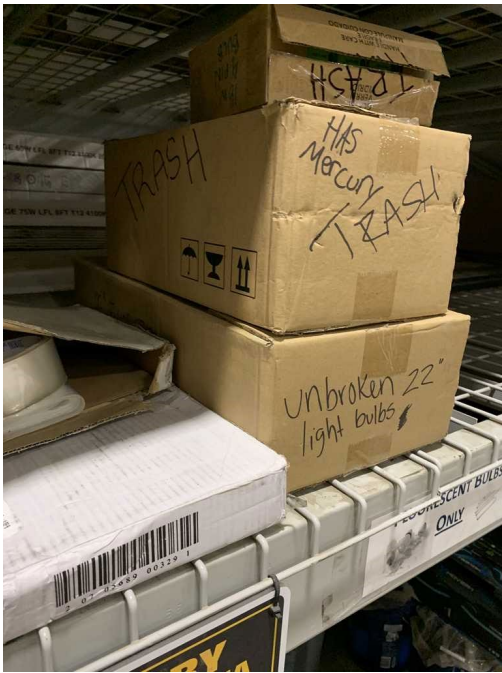
[Title]			IMG_0527.jpg
03/07/2023 09:10 AM	No CBI	No PII	Photographer: Jon Jones
Main Building/Return to Manufacturing Area (RTM)			64.85575, -147.69598333
Another view of the two boxes, seen in the previous photo (IMG_0526), that are not labeled with either the phrase "Universal Waste - Lamps," "Waste Lamps," or "Used Lamps."			



[Title]			IMG_0528.jpg
03/07/2023 09:10 AM	No CBI	No PII	Photographer: Jon Jones
Main Building/Return to Manufacturing Area (RTM)			64.85574444, -147.696
View of three additional boxes of waste lamps that were brought back to the store by a customer. The boxes are seen here not labeled with either the phrase "Universal Waste - Lamps," "Waste Lamps," or "Used Lamps."			



[Title]			IMG_0529.jpg
03/07/2023 09:11 AM	No CBI	No PII	Photographer: Jon Jones
Main Building/Return to Manufacturing Area (RTM)			64.85574444, -147.696
Another view of the same unlabeled boxes of waste lamps seen in the previous photo (IMG_0528).			



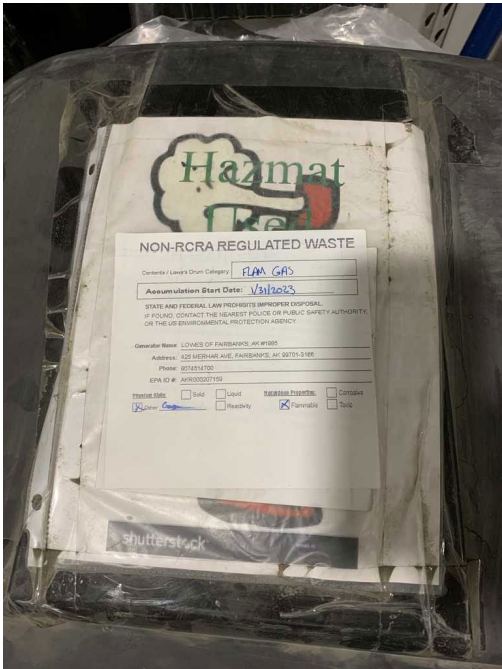
[Title]			IMG_0530.jpg
03/07/2023 09:11 AM	No CBI	No PII	Photographer: Jon Jones
Main Building/Return to Manufacturing Area (RTM)			64.85570555, -147.69595277
Another view of the same unlabeled boxes of waste lamps seen in the previous two photos (IMG_0528 and IMG_0529).			



[Title]			IMG_0533.jpg
03/07/2023 09:11 AM	No CBI	No PII	Photographer: Jon Jones
Main Building/Return to Manufacturing Area (RTM)			64.85576666, -147.696
View of a lined trash can, being used as a satellite container to accumulate waste aerosol cans. The container held waste aerosol cans and was labeled with the words "Non-RCRA Regulated Waste" and marked with a hazard indicator of "Flammable."			



[Title]			IMG_0534.jpg
03/07/2023 09:11 AM	No CBI	No PII	Photographer: Jon Jones
Main Building/Return to Manufacturing Area (RTM)			64.85575833, -147.69604444
Another view of the same container seen in the previous photo (IMG_0533), showing the labeling on the container.			



[Title]			IMG_0535.jpg
03/07/2023 09:11 AM	No CBI	No PII	Photographer: Jon Jones
Main Building/Return to Manufacturing Area (RTM)			64.85571388, -147.696
View of the labeling on the top of the satellite container being used to accumulate waste aerosol cans.			



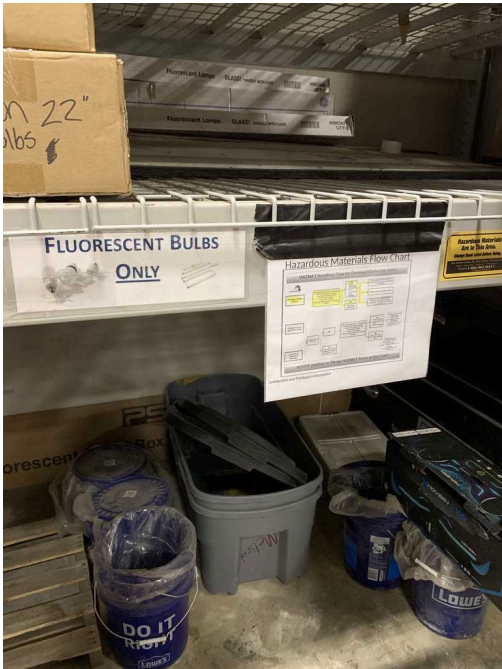
[Title]			IMG_0536.jpg
03/07/2023 09:11 AM	No CBI	No PII	Photographer: Jon Jones
Main Building/Return to Manufacturing Area (RTM)			64.85572777, -147.69586111
A close-up view of the label on the waste aerosol satellite container, showing that it is not labeled with the words, "Hazardous Waste."			



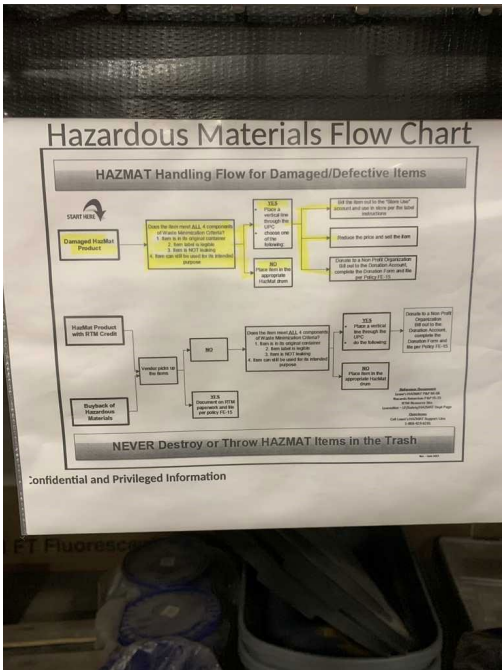
[Title]			IMG_0537.jpg
03/07/2023 09:12 AM	No CBI	No PII	Photographer: Jon Jones
Main Building/Return to Manufacturing Area (RTM)			64.85574444, -147.69589166
Another view of the waste aerosol can satellite container.			



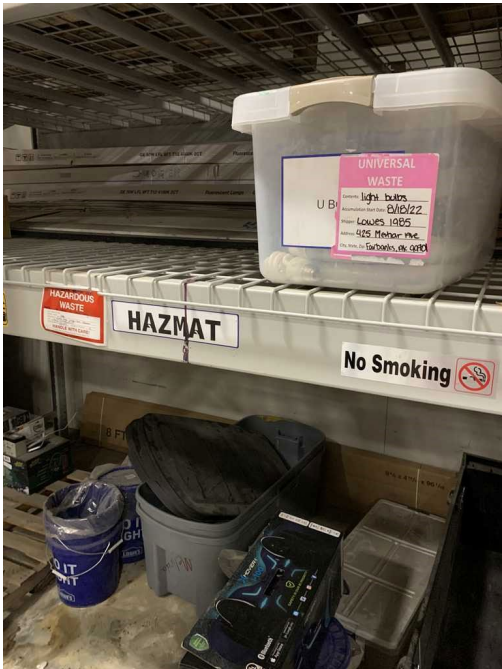
[Title]			IMG_0538.jpg
03/07/2023 09:12 AM	No CBI	No PII	Photographer: Jon Jones
Main Building/Return to Manufacturing Area (RTM)			64.85571944, -147.69587777
View of the labeling for waste batteries, on the shelving in the RTM area.			



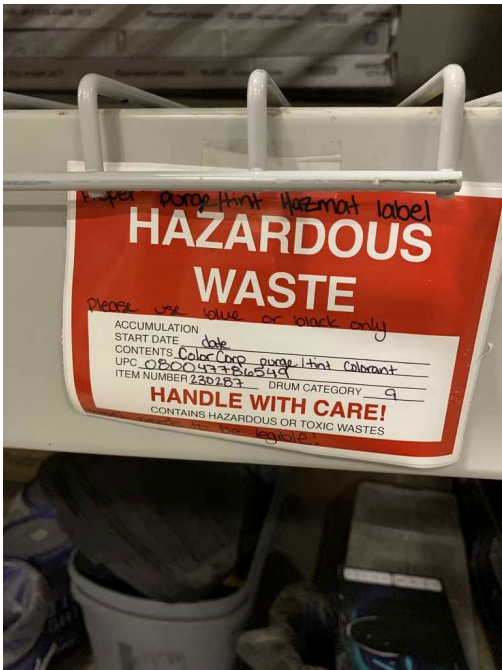
[Title]			IMG_0539.jpg
03/07/2023 09:12 AM	No CBI	No PII	Photographer: Jon Jones
Main Building/Return to Manufacturing Area (RTM)			64.85616388, -147.69598333
View of the labeling for waste lamps and flow chart on the shelving in the RTM area.			



[Title]			IMG_0540.jpg
03/07/2023 09:12 AM	No CBI	No PII	Photographer: Jon Jones
Main Building/Return to Manufacturing Area (RTM)			64.85619444, -147.69593888
Close-up view of the Hazardous Material flow chart posted on the shelving in the RTM area.			



[Title]			IMG_0541.jpg
03/07/2023 09:12 AM	No CBI	No PII	Photographer: Jon Jones
Main Building/Return to Manufacturing Area (RTM)			64.85578055, -147.69603055
Additional view of labeling on the shelving in the RTM area.			



[Title]			IMG_0542.jpg
03/07/2023 09:13 AM	No CBI	No PII	Photographer: Jon Jones
Main Building/Return to Manufacturing Area (RTM)			64.85573611, -147.69596944
Close-up view of labeling in the RTM area.			

Form Agreement, OMB No. 2550-0039

1. Generator ID Number: 004899344 FLE

2. Generator Name and Mailing Address: LOWES OF FAIRBANKS, AK 99701

3. Generator Facility Name and Site Address: 436 MEERHART AVE, FAIRBANKS, AK 99701-3168

4. Generator Phone: (907) 451-4708

5. Generator's Company Name: US ECOLOGY ALASKA LLC

6. Designated Facility Name and Site Address: 20400 LEMLEY ROAD, GRAND VIEW, ID 83624

7. Designated Facility Phone: (800) 274-1516

8. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))

No.	U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	11. Containers	12. Qty	13. U.S. DOT	14. U.S. DOT
		No.	Type	Quantity	15. U.S. DOT
1	UN3294, Waste Corrosive liquid, acidic, inorganic, n.e.s. (Sulfuric acid, Hydrochloric acid), S, PGII, ERG #154	001	DF	00004	P-0002

15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable laws, rules, and regulations.

16. International Shipments: ☐ Import to U.S. ☐ Export from U.S.

17. Transporter Acknowledgment of Receipt of Materials

18. Special Handling Instructions and Additional Information

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, storage, and recycling systems)

20. Designated Facility Name and Site Address

21. Designated Facility Phone

22. Designated Facility Name and Site Address

23. Designated Facility Phone

24. Designated Facility Name and Site Address

25. Designated Facility Phone

[Title]			IMG_0543.jpg
03/07/2023 09:45 AM	No CBI	No PII	Photographer: Jon Jones
[Building/Area]			64.85620833, -147.69589166
View of the generator copy of Manifest 004899344FLE, showing that it was not signed by either the Generator or their designated representative.			

Form Agreement, OMB No. 2550-0039

1. Generator ID Number: 004899344 FLE

2. Generator Name and Mailing Address: LOWES OF FAIRBANKS, AK 99701

3. Generator Facility Name and Site Address: 436 MEERHART AVE, FAIRBANKS, AK 99701-3168

4. Generator Phone: (907) 451-4708

5. Generator's Company Name: US ECOLOGY ALASKA LLC

6. Designated Facility Name and Site Address: 20400 LEMLEY ROAD, GRAND VIEW, ID 83624

7. Designated Facility Phone: (800) 274-1516

8. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))

No.	U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	11. Containers	12. Qty	13. U.S. DOT	14. U.S. DOT
		No.	Type	Quantity	15. U.S. DOT
1	UN3294, Waste Corrosive liquid, acidic, inorganic, n.e.s. (Sulfuric acid, Hydrochloric acid), S, PGII, ERG #154	001	DF	00004	P-0002

15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable laws, rules, and regulations.

16. International Shipments: ☐ Import to U.S. ☐ Export from U.S.

17. Transporter Acknowledgment of Receipt of Materials

18. Special Handling Instructions and Additional Information

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, storage, and recycling systems)

20. Designated Facility Name and Site Address

21. Designated Facility Phone

22. Designated Facility Name and Site Address

23. Designated Facility Phone

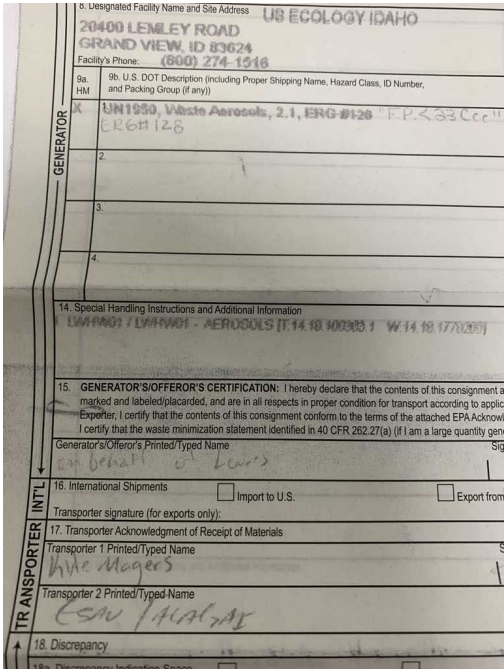
24. Designated Facility Name and Site Address

25. Designated Facility Phone

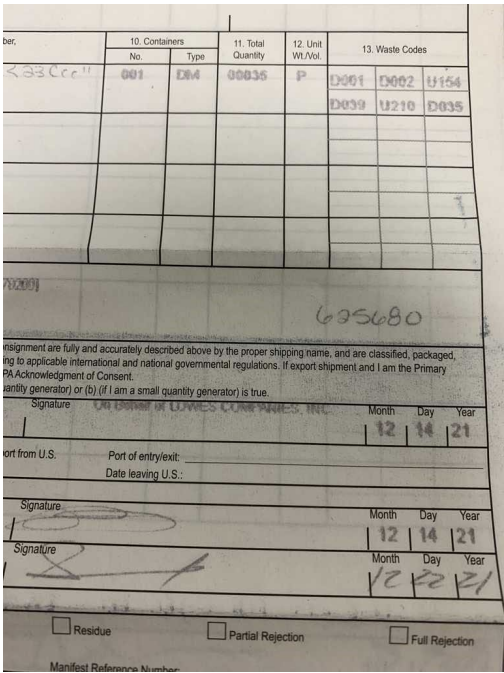
[Title]			IMG_0544.jpg
03/07/2023 09:46 AM	No CBI	No PII	Photographer: Jon Jones
[Building/Area]			64.85571944, -147.69590833
Close-up view of the Generator signature block on Manifest 004899344FLE.			

[Title]			IMG_0545.jpg
03/07/2023 09:46 AM	No CBI	No PII	Photographer: Jon Jones
[Building/Area]			64.85573611, -147.69586111
Close-up view of the Generator signature block on Manifest 004899344FLE.			

[Title]			IMG_0546.jpg
03/07/2023 09:47 AM	No CBI	No PII	Photographer: Jon Jones
[Building/Area]			64.85616944, -147.69590833
View of the generator copy of Manifest 004899349FLE, showing that it was not signed by either the Generator or their designated representative.			



[Title]			IMG_0547.jpg
03/07/2023 09:47 AM	No CBI	No PII	Photographer: Jon Jones
[Building/Area]			64.85625555, -147.69587777
Close-up view of the Generator signature block on Manifest 004899349FLE.			



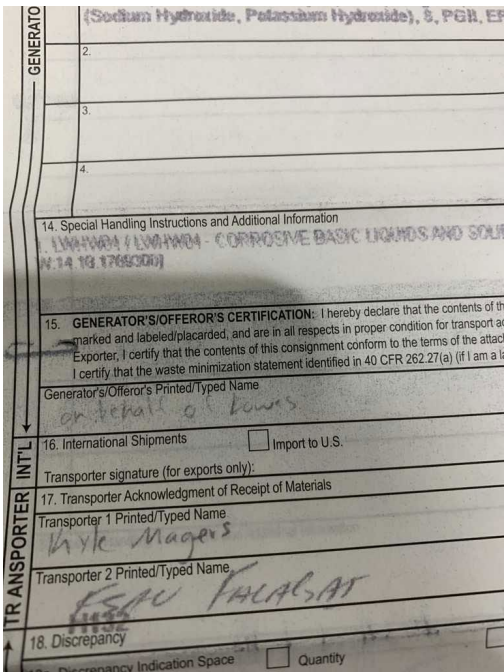
[Title]			IMG_0548.jpg
03/07/2023 09:47 AM	No CBI	No PII	Photographer: Jon Jones
[Building/Area]			64.85621666, -147.69590833
Close-up view of the Generator signature block on Manifest 004899349FLE.			

[Title]			IMG_0549.jpg
03/07/2023 09:48 AM	No CBI	No PII	Photographer: Jon Jones
[Building/Area]			64.85613888, -147.69598333
View of the generator copy of Manifest 004899348FLE, showing that it was not signed by either the Generator or their designated representative.			

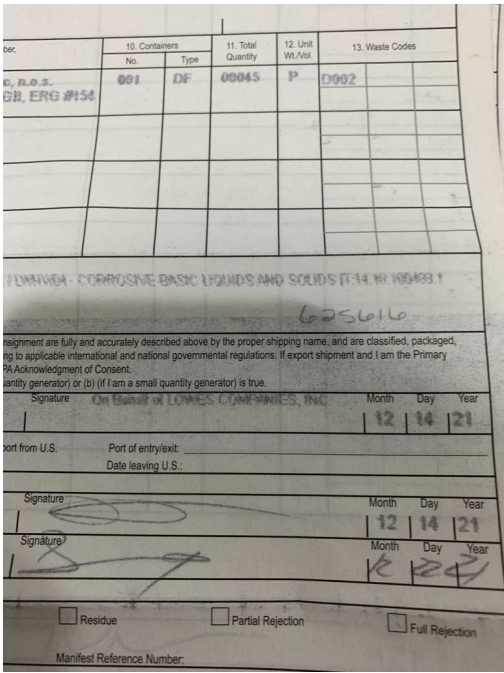
[Title]			IMG_0550.jpg
03/07/2023 09:48 AM	No CBI	No PII	Photographer: Jon Jones
[Building/Area]			64.85613888, -147.69598333
Close-up view of the Generator signature block on Manifest 004899348FLE.			

[Title]			IMG_0551.jpg
03/07/2023 09:48 AM	No CBI	No PII	Photographer: Jon Jones
[Building/Area]			64.85623055, -147.69601388
Close-up view of the Generator signature block on Manifest 004899348FLE.			

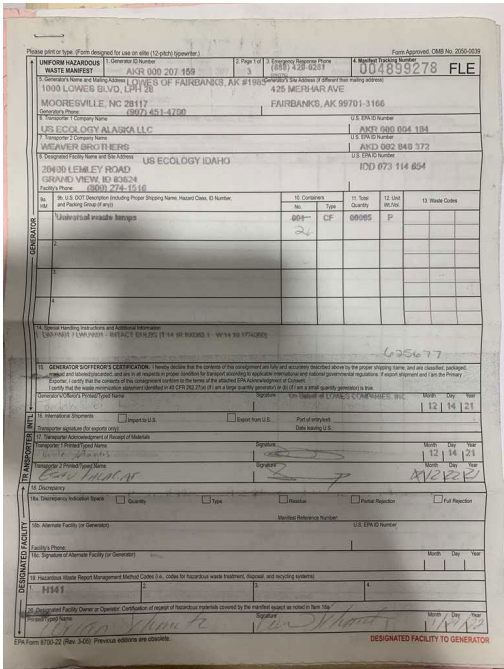
[Title]			IMG_0552.jpg
03/07/2023 09:49 AM	No CBI	No PII	Photographer: Jon Jones
[Building/Area]			64.855775, -147.69609166
View of the generator copy of Manifest 004899345FLE, showing that it was not signed by either the Generator or their designated representative.			



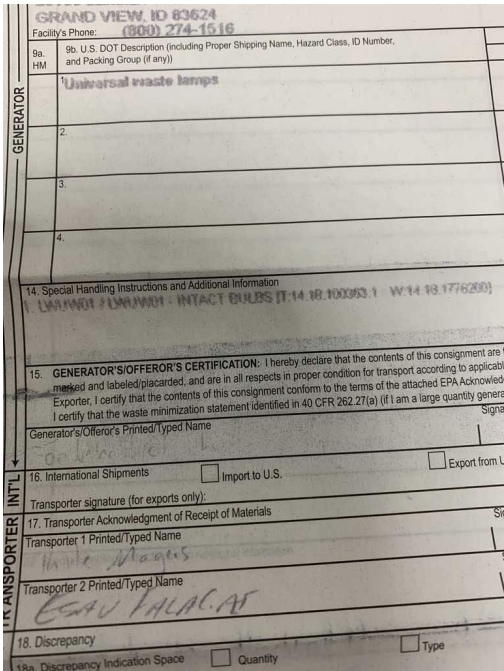
[Title]			IMG_0553.jpg
03/07/2023 09:49 AM	No CBI	No PII	Photographer: Jon Jones
[Building/Area]			64.85575, -147.69606111
Close-up view of the Generator signature block on Manifest 004899345FLE.			



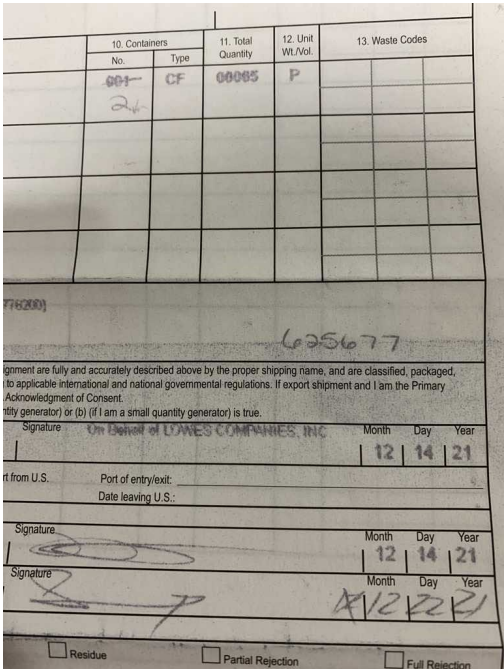
[Title]			IMG_0554.jpg
03/07/2023 09:50 AM	No CBI	No PII	Photographer: Jon Jones
[Building/Area]			64.85572777, -147.69604444
Close-up view of the Generator signature block on Manifest 004899345FLE.			



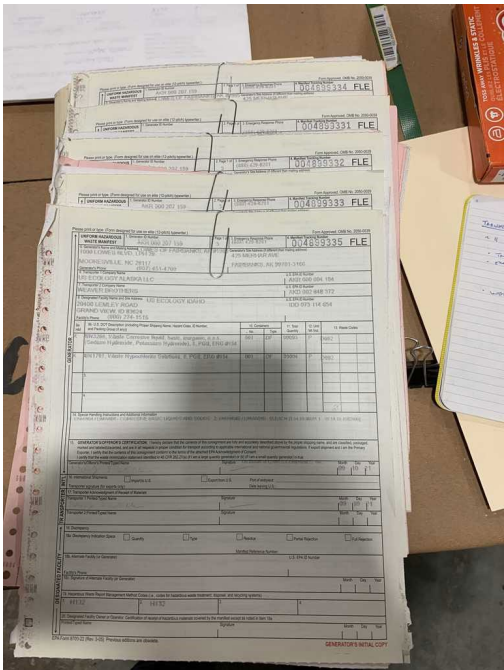
[Title]			IMG_0555.jpg
03/07/2023 09:53 AM	No CBI	No PII	Photographer: Jon Jones
[Building/Area]			[Geographic Coordinates]
View of the generator copy of Manifest 004899278FLE, showing that it was not signed by either the Generator or their designated representative.			



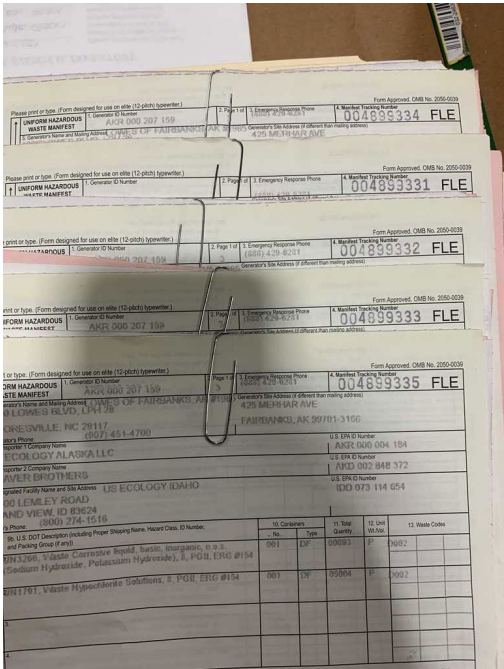
[Title]			IMG_0556.jpg
03/07/2023 09:53 AM	No CBI	No PII	Photographer: Jon Jones
[Building/Area]			64.85620833, -147.69592222
Close-up view of the Generator signature block on Manifest 004899278FLE.			



[Title]			IMG_0557.jpg
03/07/2023 09:53 AM	No CBI	No PII	Photographer: Jon Jones
[Building/Area]			64.85620833, -147.69592222
Close-up view of the Generator signature block on Manifest 004899278FLE.			



[Title]			IMG_0558.jpg
03/07/2023 10:12 AM	No CBI	No PII	Photographer: Jon Jones
[Building/Area]			64.85591111, -147.69531388
View of Manifests for which there was no copy available that had been signed by the designated facility.			



[Title]			IMG_0559.jpg
03/07/2023 10:12 AM	No CBI	No PII	Photographer: Jon Jones
[Building/Area]			64.85616388, -147.69586111
Close-up view of the manifest seen in the previous photo (IMG_0558).			

APPENDIX 2: DOCUMENT LOG

Document Type	Document Name	Contains CBI	Contains PII	Uploaded By	Date Received
Records Review	004899344FLE-2-8-2022-6-16-10-PM.pdf	No	No	Jon Jones	04/26/2023
Records Review	004899345FLE-2-8-2022-6-25-12-PM.pdf	No	No	Jon Jones	04/26/2023
Records Review	004899348FLE-2-7-2022-6-58-22-PM.pdf	No	No	Jon Jones	04/26/2023
Records Review	004899349FLE-2-7-2022-7-24-14-PM.pdf	No	No	Jon Jones	04/26/2023