

INSPECTION REPORT

Inspection Date(s):	04/12/2021 - 04/12/2021	Announced: No	
Time:	Entry: 08:48 AM (AKT)	Exit: 03:05 PM (AKT)	
Program:	RCRA		
Regulatory Program(s):	Title 40 - ENVIRONMENTAL PROTECTION AGENCY		
If Access is Denied:			
Company Name:	State of Alaska		
Facility or Site Name:	ALASKA DOT & PF 6860 GLACIER HWY		
Facility/Site Physical Address:	6860 GLACIER HWY		
(city, state, zip code)	JUNEAU, AK 99801		
Type of Operation:	Maintenance and operations (M&O) maintains highways and makes pavement repairs and the State Equipment Fleet (SEF) performs vehicle maintenance		
Size of Facility:	10 acres		
Length of Facility at Location:	Since the 1960's		
Geographic Coordinates:	58.35886, -134.5277		
Mailing address: (Secondary Address)	Mr. Michael A. Tunley michael.tunley@alaska.gov Safety Officer, State of Alaska DOT&PF, Southcoast Region 6860 Glacier Hwy. Box 112506		
(city, state, zip code)	Juneau, AK 99811-2506		
County:			
Facility/Site Identifier:	AKD983066366		
Media Number:	Unpermitted Facility		
NAICS:	92119 – Other General Government Support		
Lead Inspector:			
Jon Jones	Jones, Jon	Digitally signed by Jones, Jon Date: 2021.06.29 09:04:15 -08'00'	
	REGION 10	Jones.Jon@epa.gov	(907) 271-6329
Additional Persons Participating in Inspection:			
Supervisor Review:			
Jen Sullivan	Jennifer A Sullivan	Digitally signed by Jennifer A Sullivan Date: 2021.06.30 11:33:17 -07'00'	
	REGION 10	Sullivan.Jennifer.A@epa.gov	(206) 553-6978

SECTION I – INTRODUCTION

Purpose of the Inspection/Objective

Type of inspection: CEI - Compliance Evaluation Inspection

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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 2021.

Attendees

Title	Name	Phone	Email	Present in Opening Conf.	Present in Closing Conf.
Lead Inspector	Jon Jones	9072716329	Jones.Jon@epa.gov	Yes	Yes
Safety Officer	Mike Tunley	(907) 465-8991	michael.tunley@alaska.gov	No	Yes
Southeast District Equipment Manager, State Equipment Fleet	Tim Wolfe	(907) 465-1792	tim.wolfe@alaska.gov	Yes	Yes

Opening Conference

EPA Lead Inspector Jon Jones arrived at the Alaska DOT & PF 6860 Glacier Hwy facility at 08:48 AM (AKT) on 04/12/2021 for an inspection. I presented my credentials to Mr. Tim Wolfe and informed him that this was an EPA RCRA inspection. The table above presents all the opening and closing conference participants.

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

Only those areas in which I observed areas of concern or noted other pertinent issues are discussed in this inspection report.

I was accompanied for the entirety of the inspection by Mr. Wolfe. At the point when I inspected the M&O Tool room, we were joined by Mr. Spencer Gates, M&O Equipment Operator Foreman. At the point when I inspected the Cold Shed, we were joined by Mr. Mike Tunley, Safety Officer.

Facility/Site Description

Alaska Department of Transportation (DOT) & Public Facilities (PF) has been at its present location (6860 Glacier Highway) in Juneau since the 1960's. One side of the facility houses ADOT&PF Maintenance & Operations (M&O), which maintains highways and makes pavement repairs, and the other side of the facility houses the State Equipment Fleet (SEF), which maintains approximately 419 state owned vehicles that belong to between 10 and 15 different state agencies.

Facility Info

What type of generator facility verified as?	Verified by Mr. Wolfe as a VSQG; however, there were some wastes identified during the inspection in amounts that were indicative of the facility being a Small Quantity Generator (SQG) of hazardous waste.
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What type of generator facility notified?	Large Quantity Generator (LQG) of hazardous waste
Safety Training Provided to Inspector(s)?	No
Operating Hours	8am to 4pm, Monday through Friday
Weather Conditions	Cold and snowy
Number of employees	6 State Equipment Fleet personnel and 12 Maintenance and Operations personnel

Process Description

During the opening conference Mr. Wolfe told me about the following wastes that were generated and how the wastes were being managed. He also discussed changes since the last inspection.

SEF wastes:

Used antifreeze - Sent to recycle center at the household hazardous waste (HHW) facility in Juneau.

Used oil - oil, hydraulic fluids, all burned in an onsite used oil burning space heater in the SEF Shop.

Paint - aerosol and can for touch ups on vehicles

Oil filters - crushed onsite.

Aqueous parts washer.

Waste fluorescent lamps are managed by ADOT&PF's Division of Facilities Services. Facilities personnel go to State of Alaska buildings, on an on-call basis, replacing burnt out fluorescent lamps. The waste fluorescent lamps are taken back to the Facilities location where they are crushed. Their department was established a couple of years ago. Mr. Wolfe told me that Ms. Anna Harrison is the Facilities Director and Mr. Bill Campbell is the Building Maintenance Foreman.

Lead acid automotive batteries are turned in on a one-for-one basis to either Petro Marine or the local NAPA store.

Tool batteries get accumulated and are then taken to the HHW facility for disposal.

M&O wastes:

Waste paint - Traffic paints and coatings

Aerosol cans - paints and lubricants

Changes since the 2012 RCRA CEI include:

- Salt tent and brine making equipment was put in approximately three years ago.
- Alaska Marine Highway warehouse was transferred to M&O approximately 1.5 years ago.
- Newer buildings added for construction/engineering projects.

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Building(s)

Building/Area	Process Description	Area of Concern
Cold Shed	M&O equipment and vehicle storage.	Yes
Electricians Bay	Shop with three roll-up doors. Storage for electrical supplies and electricians' vehicles.	Yes
Equipment Shop		Yes
Boiler room		Yes
Maintenance and Operations	Tire work and light maintenance on road equipment.	Yes
Tool room		Yes
SEF Welding room		Yes
Vehicle Maintenance		Yes
The Hill		Yes

SECTION II – OBSERVATIONS AND RECORDS REVIEW**Observations**

Building: Cold Shed	Contains CBI: No
Observation #: JJ1-OB-009	Date/Time: 04/12/2021
While inspecting the Cold Shed, I saw two 55-gallon containers on a pallet. One container was open and more than half full of solid, hardened, white traffic paint. The label on the container indicated that the ingredients of the paint included Methyl Ethyl Ketone (2-Butanone). The label also contained an ignitable hazard indicator. The container that held hardened white traffic paint was open and I saw two small wooden boards that were sticking out of the container. The other container felt as though it was full when I pushed on it, looked old and rusty and according to the label, contained Toluene. While inspecting these containers, we were joined onsite by Mr. Tunley, Safety officer. Mr. Spencer Gates, M&O Equipment Operator Foreman, told me they got rid of approximately 12 containers of paint last spring and said I should talk to Marcus Zimmerman, M&O Specialist, for more information. I asked Mr. Gates for a safety data sheet for the white traffic paint and toluene. SDS's for both were provided by the facility either during or shortly following the inspection. Mr. Gates said the vendor (Clean Harbors) they used to pick up the 12 containers of waste paint last spring would not take two additional containers in the shipment of waste because the contents of those containers was unknown to Clean Harbors. At the time of the inspection, there seemed to be some confusion as to which two containers Mr. Gates was referring to that were not picked up by Clean Harbors. At the time of the inspection, no one had any information regarding how long either of the 55-gallon containers had been onsite. Just prior to leaving the area where these containers were located, Mr. Gates told me that the container of Toluene was good product and not a waste.	
Photo(s) Observation Image-202104121259565956271225.jpg Observation Image-20210412130041041289380.jpg Observation Image-2021041213010616296971.jpg	

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4. [Observation Image-20210412130226226259617.jpg](#)
5. [Observation Image-20210412130244244272723.jpg](#)

Building: Cold Shed	Contains CBI: No
Observation #: JJ1-OB-010	Date/Time: 04/12/2021
While in the same area where the containers of hardened white traffic paint and toluene were observed, I also saw an 85-gallon overpack salvage drum that contained something. I asked Mr. Gates what the salvage drum contained and he said he wasn't sure. I explained that a waste determination would need to be made regarding the contents of the overpack salvage drum. Mr. Gates indicated that this was one of the two containers that was not picked up by Clean Harbors originally referenced in JJ1-OB-009.	
Photo(s) 1. Observation Image-20210412130658658300321.jpg 2. Observation Image-20210412130711711313229.jpg 3. Observation Image-20210412130720720278022.jpg	

Building: Cold Shed	Contains CBI: No
Observation #: JJ1-OB-011	Date/Time: 04/12/2021
While continuing to inspect the Cold Shed, I saw a 55-gallon container that was on the lower level of a large steel shelf. The container was in a dark and hard to reach area, as there was a large vehicle that was parked inside the shed, adjacent to and blocking access to the container. I positioned myself as close to the container as possible and saw that the manufacturer's label indicated the contents were "Reclamite." Following the inspection, I was provided with two SDS's for the Reclamite. One from Tricor Refining, LLC and the other from Ergon Asphalt & Emulsions, Inc. I conducted a cursory review of the SDS's, which appeared to be identical, each indicating the contents were non-hazardous.	
Photo(s) 1. Observation Image-20210412132005205236946.jpg 2. Observation Image-20210412132025205205606.jpg 3. Observation Image-202104121320572057210307.jpg	

Building: Cold Shed	Contains CBI: No
Observation #: JJ1-OB-012	Date/Time: 04/12/2021
While inspecting another area of the cold shed, I saw a pallet containing various one-gallon cans of a resin and a road penetrating sealer, as well as other miscellaneous containers. Writing on the resin container read, "Do not allow to freeze." In addition to the containers that were sitting loose on the pallet, there were also approximately 22 boxes of one-gallon cans on the pallet. During the inspection I asked for an inventory and SDS's for the items on the pallet. Mr. Tunley provided the information to me following the inspection. A cursory review of the inventory indicated that there were fifty, one-gallon containers containing Sitka Pronto 19TF Modified Methacrylate Crack Sealer Part A with a DOT Category of 3 (Flammable). According to the SDS, the Crack Sealer has a flashpoint of 135°F. At the time of the inspection, this pallet and its contents were located in	

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the facility's Cold Shed where it had been stored over the winter months allowing the contents of the various containers to freeze and thaw.

Photo(s)

1. [Observation Image-202104121332173217299027.jpg](#)
2. [Observation Image-202104121332403240322846.jpg](#)
3. [Observation Image-202104121332583258283627.jpg](#)

Building: Cold Shed**Contains CBI:** No**Observation #:** JJ1-OB-013**Date/Time:** 04/12/2021

While in the same general area as the pallet discussed in Observation JJ1-OB-012, I saw an unlabeled black, 55-gallon container that was next to the pallet of resin. The container did not appear to have any labeling. I asked what the container held and no one knew what was in the container. Mr. Gates opened the container during the inspection and said that it contained white paint. Mr. Gates said it contained good usable paint and was not a waste.

Photo(s)

1. [Observation Image-202104121337553755265440.jpg](#)
2. [Observation Image-20210412133807387275125.jpg](#)
3. [Observation Image-202104121338263826256841.jpg](#)

Building: Electricians Bay**Contains CBI:** No**Observation #:** JJ1-OB-008**Date/Time:** 04/12/2021

During the inspection I saw two small cardboard boxes that contained waste high-pressure sodium light bulbs. I saw approximately 36+ waste bulbs and one of the bulbs was broken. Mr. Gates asked me how the lamps should be managed and I told him that his facility would need to make a hazardous waste determination and at that point they could determine how to manage the bulbs. At that point, I was told that the lamps and bulbs that were generated at State of Alaska facilities were being managed by the Division of Facility Services. I was told that when lamps and bulbs burn out, Facility Services sends someone out to replace the waste lamps/bulbs with new lamps/bulbs. Facility Services then takes all the waste lamps and bulbs to their shop and puts them through their bulb crusher. Following the inspection, I received an email from Mr. Tunley with an updated inventory, dated 4/15/2021. In that email, Mr. Tunley told me, "I've updated the inventory we provided to you. I've revised the counts: - 47 High-pressure sodium bulbs - 10 fluorescent light tubes Also note that these bulbs were crushed by the Division of Facility Services in their bulb crusher."

Photo(s)

1. [Observation Image-202104121234503450306488.jpg](#)
2. [Observation Image-20210412123501351330491.jpg](#)
3. [Observation Image-202104121235253525270533.jpg](#)

Building: Equipment Shop/Boiler room**Contains CBI:** No**Observation #:** JJ1-OB-006**Date/Time:** 04/12/2021

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While in the boiler room, I saw a five-gallon container that was marked with the words "Caution Hazardous Waste" and the date 9-17-02. I picked up the container and estimated it was one third full of an unknown waste. Mr. Wolfe told me that the ADOT&PF Facilities group was maintaining the equipment in the boiler room. Mr. Wolfe said he would check with Mr. Bill Campbell, Building Maintenance Foreman, to see if he knew what was in the container. At the time this inspection report was written, the contents of the container were still unknown.

Photo(s)

1. [Observation Image-202104121145564556273913.jpg](#)
2. [Observation Image-202104121146104610270717.jpg](#)
3. [Observation Image-202104121146284628193661.jpg](#)

Building: Equipment Shop/Maintenance and Operations	Contains CBI: No
Observation #: JJ1-OB-001	Date/Time: 04/12/2021
During the inspection of the facility, I viewed the Maintenance and Operations (M&O) side of the Equipment Shop from the mezzanine above.	
Photo(s)	
1. Observation Image-202104121020532053327871.jpg	

Building: Equipment Shop/Maintenance and Operations/Tool room	Contains CBI: No
Observation #: JJ1-OB-007	Date/Time: 04/12/2021
While in the Tool room on the M&O side of the Equipment Shop, I inspected the contents of a trash receptacle and saw a punctured aerosol can in the trash. Upon further inspection, I noticed that the puncture hole was different from the other punctured cans I had seen at the facility. While in the Tool room, Mr. Wolfe introduced me to Mr. Spencer Gates, M&O Equipment Operator Foreman.	
I asked Mr. Gates if there was an aerosol can puncturing device on the M&O side of the Equipment Shop. He said there was not. I then asked if someone was puncturing the aerosols with something else and he said, "That's what it looks like."	
I told both gentlemen that the inappropriate puncturing of waste aerosol cans was not deemed proper waste management regardless of generator category.	
Photo(s)	
1. Observation Image-202104121211131113337325.jpg 2. Observation Image-202104121211301130349579.jpg 3. Observation Image-202104121211441144321589.jpg	

Building: Equipment Shop/SEF Welding room	Contains CBI: No
Observation #: JJ1-OB-002	Date/Time: 04/12/2021

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At the time of the inspection, while in the SEF Welding room, I saw a 15-gallon container being used as a trash receptacle. Upon inspection of the contents, I saw a couple of aerosol cans in the trash. I asked Mr. Wolfe about the aerosol cans, and he told me they were waste aerosol cans.

Mr. Wolfe told me that there was a waste aerosol can drum-top puncturing device located in the SEF shop. Mr. Wolfe took the waste aerosol cans to the area where waste aerosol cans get punctured. I asked Mr. Wolfe how the punctured aerosol cans were being managed and he told me he thought the punctured aerosol cans were disposed of in the trash as solid waste, but he said we should check with Mr. Martin to be sure. Mr. Martin confirmed that punctured aerosol cans were disposed of as solid waste. I explained to Mr. Wolfe that R10 EPA allowed generators to puncture waste aerosol cans into SAA containers, as long as they recycle the aerosol cans.

Photo(s)

1. [Observation Image-20210412103906396342749.jpg](#)
2. [Observation Image-202104121039183918314798.jpg](#)
3. [Observation Image-202104121039333933307138.jpg](#)
4. [Observation Image-202104121042164216308559.jpg](#)
5. [Observation Image-202104121042504250352205.jpg](#)

Building: Equipment Shop/Vehicle Maintenance	Contains CBI: No
Observation #: JJ1-OB-003	Date/Time: 04/12/2021
While in the SEF vehicle maintenance shop, I saw a 55-gallon container with an aerosol can puncturing device and filter system attached. The container was marked with the date they began puncturing aerosols, 4-27-18. There were no visible markings or labeling on the container to indicate its contents other than the date they began filling the container. There was no cap on the puncturing device and the container was not closed, so the contents would have been able to evaporate. Upon further inspection, I saw that the lid to the puncturing device was on top of the container, next to the puncturing device. Mr. Wolfe closed the container during the inspection.	
Photo(s) 1. Observation Image-20210412110541541296478.jpg 2. Observation Image-20210412110551551314213.jpg 3. Observation Image-2021041211060262315074.jpg 4. Observation Image-20210412111341134299659.jpg 5. Observation Image-20210412111411141342068.jpg 6. Observation Image-202104121114541454328060.jpg	

Building: Equipment Shop/Vehicle Maintenance	Contains CBI: No
Observation #: JJ1-OB-004	Date/Time: 04/12/2021
View of a punctured aerosol can in the trash.	
Photo(s) 1. Observation Image-202104121126232623244724.jpg 2. Observation Image-202104121126302630229247.jpg	

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Building: Equipment Shop/Vehicle Maintenance	Contains CBI: No
Observation #: JJ1-OB-005	Date/Time: 04/12/2021
15-gallon used oil receiver, containing approximately 10 gallons of used oil, is not labeled with the words "Used Oil." Following the inspection, I received an email from Mr. Wolfe, dated 4/12/2021, with a photo of the 15-gallon used oil receiver labeled with the words, "Used Oil."	
Photo(s) 1. Observation Image-20210412113203323257203.jpg 2. Observation Image-202104121132193219276286.jpg 3. Observation Image-202104121132333233284307.jpg	

Building: The Hill	Contains CBI: No
Observation #: JJ1-OB-014	Date/Time: 04/12/2021
While inspecting the area west of the Cold Shed, referred to as "The Hill," I saw a lone rusty and dented 55-gallon container on a pallet that was located northwest of the Cold Shed. Mr. Gates told me the facility disposed of approximately 12 containers of hazardous waste through Clean Harbors during the spring 2020 (March/April). Mr. Gates stated that they intended to ship this container too, but Clean Harbors would not take it because it was an unknown waste. According to Mr. Gates, no weekly inspections were being conducted for this container. The container was not labeled and had no hazard indicator.	
Photo(s) 1. Observation Image-202104121345184518224573.jpg 2. Observation Image-202104121345514551183368.jpg	

Building: The Hill	Contains CBI: No
Observation #: JJ1-OB-015	Date/Time: 04/12/2021
Prior to leaving "The Hill", I saw an old rusty container by the edge of the roadway. I noticed that the container was not closed, and I asked what the container held. Mr. Gates spoke up and said that it was full of chains. I went over to get a closer look and it appeared to be half full of something with water, possibly snowmelt filling the rest of the container. At first glance I was unable to determine what the container held beneath the water. I poked at the material with a stick and found it to be hard and thought it might be full of chains. I returned to the office to conduct the closing conference and after the closing conference I decided to go back out with Messrs. Wolfe, Gates, and Tunley to remove some of the water in the container in order to get a better look at the contents of the container. After Mr. Wolfe removed some of the standing water in the container, I could see that it contained dried yellow traffic paint. I asked for a copy of the Material Safety Data Sheet (MSDS) for the paint and I was provided with a copy during the inspection. According to the MSDS, the waste paint contained the following constituents: Lead (3% by weight) and Chromium (Hexavalent Chromium 0.69 % by weight)	

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Based on those levels, the lead (30,000 ppm) and chromium (>6,000 ppm) would exceed the maximum concentration regulatory level of 5.0 (mg/L) or 5 ppm for each constituent. There was no clear indication of how long the waste had been onsite.

Photo(s)

1. [Observation Image-202104121456575657228624.jpg](#)
2. [Observation Image-20210412145708578210354.jpg](#)
3. [Observation Image-202104121457255725296743.jpg](#)
4. [Observation Image-202104121458135813224202.jpg](#)
5. [Observation Image-202104121458275827220063.jpg](#)

Records Review

At the time of the inspection, the facility had no records to review.

SECTION III – AREAS OF CONCERN

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

Building: Cold Shed		
Area:		Sub-area:
JJ1-OB-009		
While in the Cold Shed, I saw two 55-gallon containers on a pallet. One container was half-full of hardened, white traffic paint. The other container felt as though it were full, looked old and rusty and according to the label, contained Toluene.	Citation:	Section:
JJ1-OB-010		
While in the Cold Shed, I saw a salvage drum that contained something. I asked Mr. Gates what the salvage drum held and he said he wasn't sure.	Citation:	Section:
JJ1-OB-011		
While in the Cold Shed, I saw 55-gallon container of unknown contents. This container was later determined to contain Reclamite.	Citation:	Section:

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JJ1-OB-012

While inspecting another area of the cold shed, I saw a pallet containing various one-gallon cans of a resin and a road penetrating sealer. Writing on the resin container says do not allow to freeze. Approximately 22 boxes on pallet with additional miscellaneous containers requiring a waste determination.

Citation:**Section:****JJ1-OB-013**

While in the Cold Shed, I saw an unlabeled 55-gallon container next to the pallet of resin. The container was opened during the inspection and determined to be white paint.

Citation:**Section:****Building:** Electricians Bay**Area:****Sub-area:****JJ1-OB-008**

During the inspection I saw two small cardboard boxes that contained waste high-pressure sodium light bulbs. I saw 36+ waste lamps and one was broken. Mr. Gates asked how the lamps should be managed and I told him that his facility would need to make a hazardous waste determination. Following the inspection, the facility updated the inventory, indicating that there were 47 High-pressure sodium bulbs and 10 fluorescent light tubes. The bulbs and lamps were not labeled and there was no indication of when the bulbs/lamps first became a waste.

Citation:**Section:****Building:** Equipment Shop**Area:** Boiler room**Sub-area:****JJ1-OB-006**

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While in the boiler room, I saw a five-gallon container that was marked with the words "Caution Hazardous Waste" and the date 9-17-02. At the time of the inspection there was no other information available regarding the container or its contents. The container was not marked with a hazard indicator.	Citation:	Section:
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Building: Equipment Shop**Area:** Maintenance and Operations**Sub-area:** Tool room**JJ1-OB-007**

While in the tool room, I inspected the contents of a trash receptacle and saw a punctured aerosol can in the trash. Upon further inspection, I noticed that the puncture hole was different from the other punctured cans I had seen at the facility. I asked Mr. Gates if there was an aerosol can puncturing device on this end of the building. He said there was not. I then asked if someone was puncturing the aerosols with something else and he said, "That's what it looks like."	Citation:	Section:
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Building: Equipment Shop**Area:** SEF Welding room**Sub-area:****JJ1-OB-002**

There were two waste aerosol cans inside a trash receptacle, in the welding room.	Citation:	Section:
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Building: Equipment Shop**Area:** Vehicle Maintenance**Sub-area:****JJ1-OB-003**

There was no cap on the aerosol can puncturing device that was attached to the SAA container being used to accumulate waste aerosol can residue. Since the container was	Citation:	Section:
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not closed, the contents would have been able to evaporate.		
JJ1-OB-004		
View of a punctured aerosol can in the trash, showing that the facility is not recycling the can.	Citation:	Section:
JJ1-OB-005		
15-gallon used oil receiver, containing approximately 10 gallons of used oil, is not labeled with the words "Used Oil."	Citation:	Section:
Building: The Hill Area: Sub-area:		
JJ1-OB-014		
55-gallon container identified with unknown contents.	Citation:	Section:
JJ1-OB-015		
Container of dried waste traffic paint was identified. The container was not closed, not labeled with the words Hazardous Waste, a hazard indicator, or accumulation start date. According to the MSDS, the waste paint contains lead and chromium.	Citation:	Section:

SECTION IV – FOLLOW UP

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

Closing Conference

I thanked everyone for their time and cooperation during the inspection and began a review of the areas of concern that I observed during my walk-through inspection and paperwork review while at the facility. I answered any questions they had and explained the follow-up process that would take place after the inspection.

Following the inspection, I received an email from Mr. Tunley, dated 4/14/2021. In that email, Mr. Tunley referenced the following attachments, providing the following information:

- 200077596 8122 Clean Harbors – Represents three years of Juneau M&O's paint disposal.
- SEF Antifreeze shipping and disposal – Represents the last three years of Juneau SEF's antifreeze disposal.
- 12APR2021 RCRA Insp Inventory – Preliminary inventory of materials and containers identified during your inspection of our facility.
- Blank 1st Floor and 2nd Floor... - simple schematics of our different facility areas, excluding our outbuildings and outdoor areas.
- 7-Mile overview...- overhead images of our facility, outbuildings and outdoor areas captured from Google Earth (APR and SEP 2020).
- The Remaining attachments are SDS's for most of the products identified during your inspection. We will forward the remaining SDSs when they become available to us.

The email continued, with Mr. Tunley stating the following:

"We have initiated the process for getting drums and containers with unknown content sampled, identified, overpacked, shipped and disposed of. We will provide the results of sampling once we receive them. We will also provide the other documents associated with the shipping and disposal once we have those."

Mr. Tunley followed up with another email, dated 5/12/2021, after a recent phone conversation I had with him. In that email, Mr. Tunley provided some of the following information:

- SDS's for paints that were disposed of via Clean Harbors in 2020 (Ennis-Flint paints and Flush Solvent)
- A synopsis of the process used for the Bulb Crusher and filters
- "Regarding the 12 drums that were disposed of in 2020, via Clean Harbors, it is believed that these were from roadway and airfield marking projects in the Southeast District of the Southcoast Region; we are still trying to determine exactly which stations. That said, our roadway and airfield marking projects have been using Ennis-Flint products for more than 10 years. It is unknown how many of the drums disposed of in 2020 were paint vs paint related materials and, unfortunately, the additional information we were able to get from Clean Harbors was rather vague (see attachment IMG_1167)."
- "Regarding the drums you identified during your inspection, we have had them sampled by a local environmental company and are awaiting their results."
- "As for training records for Hazardous/Universal Waste training, we were not able to locate any training records. That said, our team is developing training modules for the various workgroups that generate and handle RCRA wastes."

At the time this inspection report was completed, no other outstanding information has been received from the facility.

SECTION V – SAMPLING ACTIVITIES AND ANALYTICAL RESULTS**No sampling was conducted.****SECTION VI – LIST OF APPENDICES****Photo Log**

[Title] Observation_Image-202104121259565956271225.jpg 04/12/2021 12:59 PM (AKT) Jon Jones Cold Shed No CBI No PII View of open container that was half full of hardened, white traffic paint.	
[Title] Observation_Image-20210412130041041289380.jpg 04/12/2021 01:00 PM (AKT) Jon Jones Cold Shed No CBI No PII Close-up view of the label on the open container that was half full of hardened, white traffic paint.	

Inspection Date(s):

04/12/2021 - 04/12/2021

[Title] Observation_Image-2021041213010616296971.jpg 04/12/2021 01:01 PM (AKT) Jon Jones Cold Shed No CBI No PII Close-up view looking down into the open container that was half full of hardened, white traffic paint.	
[Title] Observation_Image-20210412130226226259617.jpg 04/12/2021 01:02 PM (AKT) Jon Jones Cold Shed No CBI No PII Another view of the open container that was half full of hardened, white traffic paint, and next to a 55-gallon container labeled as Toluene.	

Inspection Date(s):

04/12/2021 - 04/12/2021

[Title]
Observation_Image-20210412130244244272723.jpg
04/12/2021 01:02 PM (AKT)
Jon Jones
Cold Shed
No CBI
No PII
Close-up view of the label on the container of Toluene.
[Title]
Observation_Image-20210412130658658300321.jpg
04/12/2021 01:06 PM (AKT)
Jon Jones
Cold Shed
No CBI
No PII
View of an 85-gallon salvage drum that held unknown contents. I asked Mr. Gates what the salvage drum held and he said he wasn't sure.



Inspection Date(s):

04/12/2021 - 04/12/2021

<i>[Title]</i>	
Observation_Image-20210412130711711313229.jpg	
04/12/2021 01:07 PM (AKT)	
Jon Jones	
Cold Shed	
No CBI	
No PII	
Another view of the 85-gallon salvage container with unknown contents.	
<i>[Title]</i>	
Observation_Image-20210412130720720278022.jpg	
04/12/2021 01:07 PM (AKT)	
Jon Jones	
Cold Shed	
No CBI	
No PII	
Another view of the 85-gallon salvage container with unknown contents.	

Inspection Date(s):

04/12/2021 - 04/12/2021

[Title]	
Observation_Image-20210412132005205236946.jpg	
04/12/2021 01:20 PM (AKT)	
Jon Jones	
Cold Shed	
No CBI	
No PII	
[Title]	
Observation_Image-202104121320252025205606.jpg	
04/12/2021 01:20 PM (AKT)	
Jon Jones	
Cold Shed	
No CBI	
No PII	
Closer view of 55-gallon container label marked as being Reclamite.	

Inspection Date(s):

04/12/2021 - 04/12/2021

[Title]

Observation_Image-
202104121320572057210307.jpg

04/12/2021 01:20 PM (AKT)

Jon Jones

Cold Shed

No CBI

No PII

Another view of 55-gallon container label
marked as being Reclamite.



[Title]

Observation_Image-
202104121332173217299027.jpg

04/12/2021 01:32 PM (AKT)

Jon Jones

Cold Shed

No CBI

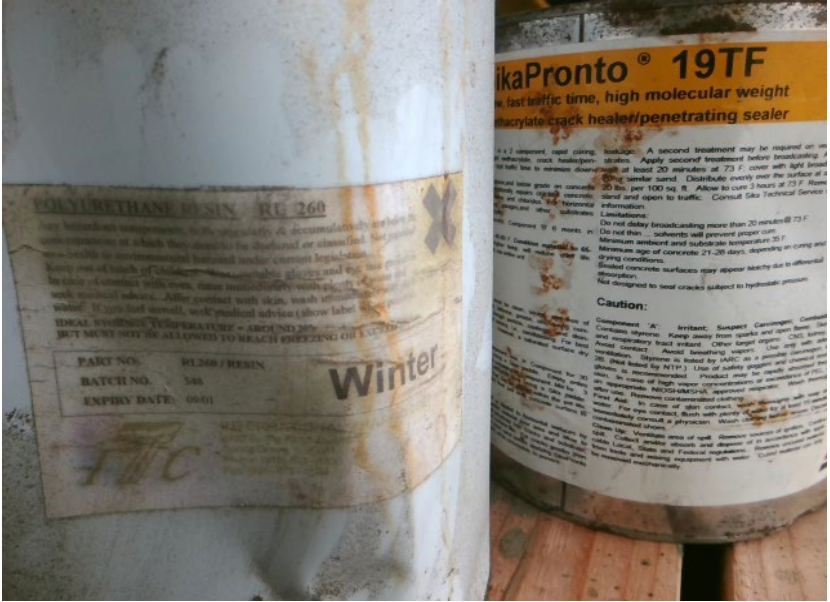
No PII

Various one-gallon cans of a resin and a road
penetrating sealer observed on a pallet.
Writing on the resin container says do not
allow to freeze. Approximately 22 boxes on
pallet.



Inspection Date(s):

04/12/2021 - 04/12/2021

[Title]	
Observation_Image- 202104121332403240322846.jpg	
04/12/2021 01:32 PM (AKT)	
Jon Jones	
Cold Shed	
No CBI	
No PII	
Close-up view of the labels on various one-gallon cans of a resin and a road penetrating sealer. Writing on the resin container does not allow to freeze. Approximately 22 boxes on pallet.	
[Title]	
Observation_Image- 202104121332583258283627.jpg	
04/12/2021 01:32 PM (AKT)	
Jon Jones	
Cold Shed	
No CBI	
No PII	
View of the pallet containing various one-gallon cans of a resin and a road penetrating sealer. Approximately 22 boxes on pallet along with other miscellaneous containers.	

Inspection Date(s):

04/12/2021 - 04/12/2021

[Title] Observation_Image-202104121337553755265440.jpg 04/12/2021 01:37 PM (AKT) Jon Jones Cold Shed No CBI No PII View of unlabeled 55-gallon container, that was next to pallet of resin beneath the steel shelving.	
[Title] Observation_Image-20210412133807387275125.jpg 04/12/2021 01:38 PM (AKT) Jon Jones Cold Shed No CBI No PII Close-up view of the contents of the pallet.	

Inspection Date(s):

04/12/2021 - 04/12/2021

[Title]	
Observation_Image-202104121338263826256841.jpg	
04/12/2021 01:38 PM (AKT)	
Jon Jones	
Cold Shed	
No CBI	
No PII	
Close-up view of the contents of the pallet.	
[Title]	
Observation_Image-202104121234503450306488.jpg	
04/12/2021 12:34 PM (AKT)	
Jon Jones	
Electricians Bay	
No CBI	
No PII	
View of 47 waste high-pressure sodium bulbs. The waste bulbs were in containers that were not closed, labeled, and there was no indication as to when the bulbs became a waste.	

Inspection Date(s):

04/12/2021 - 04/12/2021

[Title]

Observation_Image-
20210412123501351330491.jpg

04/12/2021 12:35 PM (AKT)

Jon Jones

Electricians Bay

No CBI

No PII

Close-up view of the waste high-pressure sodium bulbs. A broken bulb can be seen in the bottom right-hand corner of the box on the left.



[Title]

Observation_Image-
202104121235253525270533.jpg

04/12/2021 12:35 PM (AKT)

Jon Jones

Electricians Bay

No CBI

No PII

Close-up view of a high-pressure sodium bulb sleeve, showing the manufacturer information.



Inspection Date(s):

04/12/2021 - 04/12/2021

[Title]

Observation_Image-
202104121145564556273913.jpg

04/12/2021 11:45 AM (AKT)

Jon Jones

Equipment Shop/Boiler room

No CBI

No PII

View of a five-gallon container that was marked with the words "Caution Hazardous Waste" and the date 9-17-02. The container is seen here with the blue lid.



[Title]

Observation_Image-
202104121146104610270717.jpg

04/12/2021 11:46 AM (AKT)

Jon Jones

Equipment Shop/Boiler room

No CBI

No PII

Close-up view of the five-gallon container that was marked with the words "Caution Hazardous Waste" and the date 9-17-02.



Inspection Date(s):

04/12/2021 - 04/12/2021

[Title]	
Observation_Image-202104121146284628193661.jpg	
04/12/2021 11:46 AM (AKT)	
Jon Jones	
Equipment Shop/Boiler room	
No CBI	
No PII	
Another close-up view of the five-gallon container that was marked with the words "Caution Hazardous Waste" and the date 9-17-02.	
[Title]	
Observation_Image-202104121020532053327871.jpg	
04/12/2021 10:20 AM (AKT)	
Jon Jones	
Equipment Shop/Maintenance and Operations	
No CBI	
No PII	
View of the M&O side of the Equipment Shop, as seen from the mezzanine above.	

Inspection Date(s):

04/12/2021 - 04/12/2021

[Title]	
Observation_Image- 20210412103906396342749.jpg	
04/12/2021 10:39 AM (AKT)	
Jon Jones	
Equipment Shop/SEF Welding room	
No CBI	
No PII	
View of waste aerosol can inside a trash receptacle, in the welding room.	
[Title]	
Observation_Image- 202104121039183918314798.jpg	
04/12/2021 10:39 AM (AKT)	
Jon Jones	
Equipment Shop/SEF Welding room	
No CBI	
No PII	
Close-up view of same waste aerosol can inside a trash receptacle, in the welding room.	

Inspection Date(s):

04/12/2021 - 04/12/2021

[Title]

Observation_Image-
202104121039333933307138.jpg

04/12/2021 10:39 AM (AKT)

Jon Jones

Equipment Shop/SEF Welding room

No CBI

No PII

View of second waste aerosol can in the bottom of the trash receptacle, in the welding room.



[Title]

Observation_Image-
202104121042164216308559.jpg

04/12/2021 10:42 AM (AKT)

Jon Jones

Equipment Shop/SEF Welding room

No CBI

No PII

Close-up view of both waste aerosol cans inside a trash receptacle, in the welding room.



Inspection Date(s):

04/12/2021 - 04/12/2021

[Title]

Observation_Image-
202104121042504250352205.jpg

04/12/2021 10:42 AM (AKT)

Jon Jones

Equipment Shop/SEF Welding room

No CBI

No PII

Close-up view of the labeling on the waste aerosol cans inside a trash receptacle, in the welding room.



[Title]

Observation_Image-
20210412110541541296478.jpg

04/12/2021 11:05 AM (AKT)

Jon Jones

Equipment Shop/Vehicle Maintenance

No CBI

No PII

View of the SAA container with attached aerosol can popper.



Inspection Date(s):

04/12/2021 - 04/12/2021

[Title]	
Observation_Image-20210412110551551314213.jpg	
04/12/2021 11:05 AM (AKT)	
Jon Jones	
Equipment Shop/Vehicle Maintenance	
No CBI	
No PII	
Close-up view of the SAA container with attached aerosol can popper.	
[Title]	
Observation_Image-2021041211060262315074.jpg	
04/12/2021 11:06 AM (AKT)	
Jon Jones	
Equipment Shop/Vehicle Maintenance	
No CBI	
No PII	
Close-up view of the top of the aerosol can popper, showing that the lid is not attached and the container is not closed.	

Inspection Date(s):

04/12/2021 - 04/12/2021

[Title]	
Observation_Image-2021041211111341134299659.jpg	
04/12/2021 11:11 AM (AKT)	
Jon Jones	
Equipment Shop/Vehicle Maintenance	
No CBI	
No PII	
Another view of the same SAA container showing that the aerosol can popper lid is not attached and laying on top of the container.	
[Title]	
Observation_Image-2021041211111411141342068.jpg	
04/12/2021 11:11 AM (AKT)	
Jon Jones	
Equipment Shop/Vehicle Maintenance	
No CBI	
No PII	
Close-up view of the aerosol can popper lid laying on the top of the SAA container.	

Inspection Date(s):

04/12/2021 - 04/12/2021

*[Title]*Observation_Image-
202104121114541454328060.jpg

04/12/2021 11:14 AM (AKT)

Jon Jones

Equipment Shop/Vehicle Maintenance

No CBI

No PII

Mr. Wolfe closed the container during the inspection by placing the lid back on the aerosol can popper.

*[Title]*Observation_Image-
202104121126232623244724.jpg

04/12/2021 11:26 AM (AKT)

Jon Jones

Equipment Shop/Vehicle Maintenance

No CBI

No PII

View of a punctured aerosol can in the trash.



Inspection Date(s):

04/12/2021 - 04/12/2021

[Title] Observation_Image-202104121126302630229247.jpg 04/12/2021 11:26 AM (AKT) Jon Jones Equipment Shop/Vehicle Maintenance No CBI No PII Close-up view of a punctured aerosol can in the trash.	
[Title] Observation_Image-20210412113203323257203.jpg 04/12/2021 11:32 AM (AKT) Jon Jones Equipment Shop/Vehicle Maintenance No CBI No PII View of 15-gallon used oil receiver, containing approximately 10 gallons of used oil, that is not labeled with the words "Used Oil."	

Inspection Date(s):

04/12/2021 - 04/12/2021

*[Title]*Observation_Image-
202104121132193219276286.jpg

04/12/2021 11:32 AM (AKT)

Jon Jones

Equipment Shop/Vehicle Maintenance

No CBI

No PII

Another view of 15-gallon used oil receiver, containing approximately 10 gallons of used oil, that is not labeled with the words "Used Oil."

*[Title]*Observation_Image-
202104121132333233284307.jpg

04/12/2021 11:32 AM (AKT)

Jon Jones

Equipment Shop/Vehicle Maintenance

No CBI

No PII

Another view of 15-gallon used oil receiver, containing approximately 10 gallons of used oil, that is not labeled with the words "Used Oil."



Inspection Date(s):

04/12/2021 - 04/12/2021

[Title]

Observation_Image-
202104121211131113337325.jpg

04/12/2021 12:11 PM (AKT)

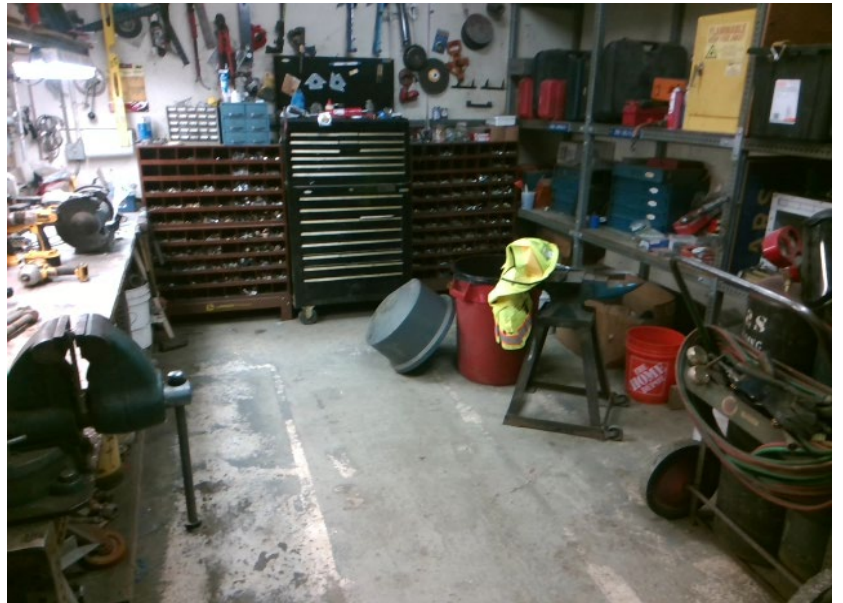
Jon Jones

Maintenance and Operations/Tool room

No CBI

No PII

View of the tool room, where I inspected the contents of a trash receptacle and saw a punctured aerosol can in the trash. Upon further inspection, I noticed that the puncture hole was different from the other punctured cans I had seen at the facility. I asked Mr. Gates if there was an aerosol can puncturing device on this end of the building. He said there was not. I then asked if someone was puncturing the aerosols with something else and he said, "That's what it looks like."



[Title]

Observation_Image-
202104121211301130349579.jpg

04/12/2021 12:11 PM (AKT)

Jon Jones

Maintenance and Operations/Tool room

No CBI

No PII

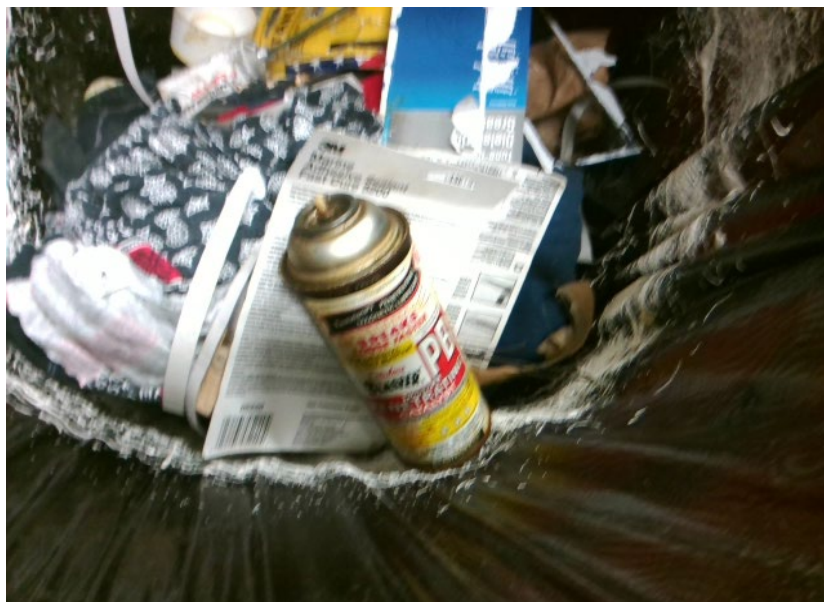
View of the punctured aerosol can in the trash receptacle.



Inspection Date(s):

04/12/2021 - 04/12/2021

[Title]
Observation_Image-202104121211441144321589.jpg
04/12/2021 12:11 PM (AKT)
Jon Jones
Maintenance and Operations/Tool room
No CBI
No PII
View of the punctured aerosol can in the trash receptacle.
[Title]
Observation_Image-202104121345184518224573.jpg
04/12/2021 01:45 PM (AKT)
Jon Jones
The Hill
No CBI
No PII
Rusty and dented 55-gallon container holding unknown contents.



Inspection Date(s):

04/12/2021 - 04/12/2021

[Title]	
Observation_Image-202104121345514551183368.jpg	
04/12/2021 01:45 PM (AKT)	
Jon Jones	
The Hill	
No CBI	
No PII	
Another view of the rusty and dented 55-gallon container holding unknown contents.	
[Title]	
Observation_Image-202104121456575657228624.jpg	
04/12/2021 02:56 PM (AKT)	
Jon Jones	
The Hill	
No CBI	
No PII	
Open 55-gallon container half full of dried waste yellow traffic paint.	

Inspection Date(s):

04/12/2021 - 04/12/2021

[Title]	
Observation_Image-20210412145708578210354.jpg	
04/12/2021 02:57 PM (AKT)	
Jon Jones	
The Hill	
No CBI	
No PII	
View of the bottom of the container, showing that at one point in time, the waste paint was leaking from the bottom of the container.	

[Title]	
Observation_Image-202104121457255725296743.jpg	
04/12/2021 02:57 PM (AKT)	
Jon Jones	
The Hill	
No CBI	
No PII	
View of the contents of the container holding the dried yellow waste traffic paint.	

Inspection Date(s):

04/12/2021 - 04/12/2021

[Title]	
Observation_Image-202104121458135813224202.jpg	
04/12/2021 02:58 PM (AKT)	
Jon Jones	
The Hill	
No CBI	
No PII	
View of the container, half full of waste traffic paint, as seen from the roadway leading into the area known as “The Hill.”	

[Title]	
Observation_Image-202104121458275827220063.jpg	
04/12/2021 02:58 PM (AKT)	
Jon Jones	
The Hill	
No CBI	
No PII	
Another view of the container, half full of waste traffic paint, as seen from the roadway leading into the area known as “The Hill.” This view shows the Cold Shed to the far left and the Equipment shop straight ahead.	

Document Log

Inspection Date(s):

04/12/2021 - 04/12/2021

Document Type	Document Name	Contains CBI	Contains PII	Uploaded By	Date Received
Other - Material Safety Data Sheets (MSDS) / Safety Data Sheets (SDS) for waste identified in the Cold Shed	Burke 3200 Useal Part A.pdf	No	No	Jon Jones	06/10/2021
Other - Material Safety Data Sheets (MSDS) / Safety Data Sheets (SDS) for waste identified in the Cold Shed	SikaPronto19TF part B.pdf	No	No	Jon Jones	06/10/2021
Other - Material Safety Data Sheets (MSDS) / Safety Data Sheets (SDS) for waste identified in the Cold Shed	Permagile Part B.pdf	No	No	Jon Jones	06/10/2021
Other - Material Safety Data Sheets (MSDS) / Safety Data Sheets (SDS) for waste identified in the Cold Shed	Power_Steering_Fluid_AC_Delco_10-5073_SDS_EN.pdf	No	No	Jon Jones	06/10/2021
Other - Material Safety Data Sheets (MSDS) / Safety Data Sheets (SDS) for waste identified in the Cold Shed	Bondo traffic sensor seal 7084 pt A and B.pdf	No	No	Jon Jones	06/11/2021
Other - Material Safety Data Sheets (MSDS) / Safety Data Sheets (SDS) for waste identified in the Cold Shed	Chemsearch ChromaTite ptA.pdf	No	No	Jon Jones	06/11/2021
Other - Material Safety Data Sheets (MSDS) / Safety Data Sheets (SDS) for waste identified in the Cold Shed	Chemsearch ChromaTite ptB.pdf	No	No	Jon Jones	06/11/2021
Other - Material Safety Data Sheets (MSDS) / Safety Data Sheets (SDS) for waste	Chemsearch GripTite ptA, B, C.pdf	No	No	Jon Jones	06/11/2021

Inspection Date(s):

04/12/2021 - 04/12/2021

identified in the Cold Shed					
Other - Material Safety Data Sheets (MSDS) / Safety Data Sheets (SDS) for waste identified in the Cold Shed	Chevron Supreme Motor Oil SAE 5W-30 MSDS - Chevron-Supreme-Motor-Oil-SAE-5W-30-MSDS.pdf	No	No	Jon Jones	06/11/2021
Other - Material Safety Data Sheets (MSDS) / Safety Data Sheets (SDS) for waste identified in the Cold Shed	CITGO 500 15W40.pdf	No	No	Jon Jones	06/11/2021
Other - Material Safety Data Sheets (MSDS) / Safety Data Sheets (SDS) for waste identified in the Cold Shed	PARKS DENATURED ALCOHOL _2122-2123-2125-2127_.doc - MSDS - Parks.pdf	No	No	Jon Jones	06/11/2021
Other - Material Safety Data Sheets (MSDS) / Safety Data Sheets (SDS) for waste identified in the Cold Shed	Sika Pronto 19TF ptA.pdf	No	No	Jon Jones	06/11/2021
Other - Material Safety Data Sheets (MSDS) / Safety Data Sheets (SDS) for waste identified in the Cold Shed	Tricor Asphalt Rejuvenating Agent.pdf	No	No	Jon Jones	06/11/2021
Other - Material Safety Data Sheets (MSDS) / Safety Data Sheets (SDS) for waste identified in the Cold Shed	Toluene.pdf	No	No	Jon Jones	06/11/2021
Other - Material Safety Data Sheets (MSDS) / Safety Data Sheets (SDS) for waste identified in the Cold Shed	MORTON INTL INC SPECIALTY CHEMICALS GROUP.pdf	No	No	Jon Jones	06/11/2021
Other - Material Safety Data Sheets (MSDS) / Safety Data Sheets (SDS) for traffic paint	EF SB LowVOC White.pdf	No	No	Jon Jones	06/11/2021

Inspection Date(s):

04/12/2021 - 04/12/2021

Other - Material Safety Data Sheets (MSDS) / Safety Data Sheets (SDS) for traffic paint	EF SB LowVOC Yello.pdf	No	No	Jon Jones	06/11/2021
Other - Material Safety Data Sheets (MSDS) / Safety Data Sheets (SDS) for traffic paint	EF SB FlushSolvent.pdf	No	No	Jon Jones	06/11/2021
Other - Material Safety Data Sheets (MSDS) / Safety Data Sheets (SDS) for traffic paint	EF WB White.pdf	No	No	Jon Jones	06/11/2021
Other - Material Safety Data Sheets (MSDS) / Safety Data Sheets (SDS) for traffic paint	EF WB Yello.pdf	No	No	Jon Jones	06/11/2021
Other - Material Safety Data Sheets (MSDS) / Safety Data Sheets (SDS) for traffic paint	MSDS from 2012 CEI for Morline Yellow Traffic Paint.PDF	No	No	Jon Jones	06/11/2021
Other - Inventory of RCRA Waste identified12APR2021	12APR2021 RCRA Insp Inventory.pdf	No	No	Jon Jones	06/11/2021
Other - Edited Inventory RCRA Waste identified 12APR2021	edit15APR2021 RCRA Insp Inventory.pdf	No	No	Jon Jones	06/11/2021
Other - Bulb crushing information	Regarding Bulb Crusher.pdf	No	No	Jon Jones	06/11/2021
Facility Map	7-Mile overview-high.jpg	No	No	Jon Jones	06/11/2021
Facility Map	7-Mile overview-low.jpg	No	No	Jon Jones	06/11/2021
Facility Map	7-Mile overview-mid.jpg	No	No	Jon Jones	06/11/2021
Facility Map	Blank 1st Floor M&OnSEF.pdf	No	No	Jon Jones	06/11/2021
Facility Map	Blank 1st Floor Offices.pdf	No	No	Jon Jones	06/11/2021
Facility Map	Blank 2nd Floor M&OnSEF.pdf	No	No	Jon Jones	06/11/2021
Facility Map	Blank 2nd Floor Offices w Mez.pdf	No	No	Jon Jones	06/11/2021
Other - Receipt and Clean Harbors Waste Inventory sheet for 12, 55-gallon containers of Paint Related Material (PRM) totaling 6,411 pounds	200077596 8122 Clean Harbors \$8,141.97.pdf	No	No	Jon Jones	06/11/2021
Communications	SEF Antifreeze shipping and disposal for EPA .pdf	No	No	Jon Jones	06/11/2021
Communications	FW_ Oil can photo SEF.pdf	No	No	Jon Jones	06/11/2021

Inspection Date(s):

04/12/2021 - 04/12/2021

Communications	4.15.21 email rearding lamp-bulb management and inventory.pdf	No	No	Jon Jones	06/11/2021
Communications	5.12.21 email from facility.pdf	No	No	Jon Jones	06/11/2021
Inspection Reports	Field_Notes_AKD983066366v1.0.pdf	No	No	Jon Jones	06/11/2021