EPA United States Environmental Protection Agency

EPA REGION 10 Enforcement and Compliance Assurance Division

INSPECTION REPORT

Inspection Entry Date/Time	06/27/2024 09:00 AM (PT)	Announced: Yes
Inspection Exit Date/Time	06/27/2024 02:05 PM (PT)	Access: Granted
Weather	56°F, Sunny	
Media	Water	
Statute(s)/Program(s)	Clean Water Act, NPDES, Stormwater – Industrial	
Type of Inspection	Compliance Evaluation Inspection	
Permittee Name	Benjamin Storey – AKDOT&PF	
Facility or Site Name	Wrangell Airport	
Facility/Site Physical Address	Airport Loop Road	
City, State, Zip Code	Wrangell, Alaska 99929	
Borough	Wrangell	
Facility GPS Coordinates	56.485293, -132.378902	
Mailing Address	P.O. Box 112506	
City, State, Zip Code	Juneau, Alaska 99811	
FRS ID	110038085513	
Permit Number	AKR06AC93	
SIC	4581 (Airports, Flying Fields & Services)	

Lead Inspector:

RAYMOND ANDREWS Digitally signed by RAYMOND ANDREWS Date: 2024.08.02 11:03:34 -07'00'

Raymond Andrews	EPA Region 10	andrews.raymond@epa.gov	(206) 553-4252

Supervisor Review:

PETER CONTRERAS Digitally signed by PETER CONTRERAS Date: 2024.08.02 11:22:33 -07'00'

Peter Contreras	EPA Region 10	contreras.peter@epa.gov	(206) 553-6708

SECTION I – Opening Conference

I arrived at the Wrangell Airport (the “Site” or “Facility”), located at Airport Loop Road, Wrangell, Alaska, at 09:00 AM (PT) on 06/27/2024 for an announced inspection. I presented my credentials to Gary Allen and informed him I was there to determine compliance with the Clean Water Act (CWA), and the facility’s National Pollutant Discharge Elimination System (NPDES) permit, permit # AKR06AC93. This report is based on information supplied by facility representatives, direct observations made by me, and records and reports maintained by the facility. In addition, information gathered prior to, or after, the Inspection from a review of EPA, State, and/or public records may be included in this report.

Attendees

Organization	Attendee Name	Title	Present in Opening Conf.	Present in Closing Conf.
EPA REGION 10	Raymond Andrews	Lead Inspector	Yes	Yes
AKDOT & PF	Gary Allen	Foreman	Yes	Yes
AKDOT&PF	Tyler Riberio	Environmental Analyst	Yes	Yes

Facility Information:

Responsible official	Benjamin Storey, cc: Tyler Riberio
Type of Operation	Airport
Industrial Sector	Sector S (Airports, Flying Fields & Services)
Is property owned?	The State of Alaska owns and operates the airport.
Size of Facility	The airport owns 263 total acres but the operational area a total of 151 acres.
Years in operation	The facility has been in operation since approximately 1973.
Number of employees	The facility has four employees involved in operations and maintenance of the airport and local highway.
Hours/Days	The facility operates from 6am until 5pm Monday through Friday.
Industrial activities exposed to stormwater	The only industrial activity exposed to stormwater is de-icing operations. The uses a new de-icer called New Deal, which binds to the soil.
Personnel conducting inspections/sampling	Gary Allen conducts all sampling and inspections for the site. The facility is only required to conduct quarterly visual assessments (QVAs). The facility is not required to conduct water sample analysis because the facility does not use 100 tons or more of urea or 100,000 gallons of pure glycol in glycol-based deicing fluids. The facility does not use any amount of glycol or urea.
Sampling locations	Samples are collected from outfalls A and B; sample is collected from sheet flow
Receiving Water	Eastern Passage
Number/location of Outfalls	The facility has two outfalls. The site has a natural gradient that directs the flow to either the south or north sides where the stormwater enters a culvert that directs the flow to one of the two outfalls.
Stormwater Treatment	The facility does not use active BMPs or stormwater treatment.
Industrial activities exposed to stormwater	The only industrial activity exposed to stormwater is de-icing operations. The uses a new de-icer called New Deal, which binds to the soil.
Materials and/or vehicles stored outdoors	The facility stores its pickup trucks and street sweepers outdoors.

SECTION II – Observations

I did not observe anything that would constitute an area of concern.

SECTION III – Records Review

Records may not be in sequential order.

Record: Other - MSGP Annual Reporting Forms		**AOC:** Yes
Ref #: RA1-RR-009	**Reviewed By:** Raymond Andrews	**Reviewed Date:** 08/01/2024
Post inspection I reviewed the facility's MSGP Annual Reporting forms which the facility emailed me on June 27, 2024. The forms I received were dated February 7, 2022, January 3, 2023, and January 7, 2024. All three of the Annual Reports were missing the APDES Permit Tracking Number and the forms for 2023 and 2024 did not include the full facility name. The forms I received dated 2022 and 2024 did not include all pages. Both forms were missing three pages including the signature page.		
Record: Other - Comprehensive Site Inspections		**AOC:** Yes
Ref #: RA1-RR-008	**Reviewed By:** Raymond Andrews	**Reviewed Date:** 06/27/2024
At the time of the inspection, I reviewed the facility's Comprehensive Site Inspection reports from 2021 through 2023. The inspection reports were signed but did not contain the certification required by the permit.		
Record: Other - Quarterly Visual Assessments (QVAs)		**AOC:** Yes
Ref #: RA1-RR-007	**Reviewed By:** Raymond Andrews	**Reviewed Date:** 06/27/2024
At the time of the inspection, I reviewed the facility's QVAs from 1Q2021 through 4Q2023. The QVAs were signed by the appropriate person but they did not include the certification statement required by the permit.		
Record: Other - Routine Monthly Facility Inspection Reports		**AOC:** No
Ref #: RA1-RR-006	**Reviewed By:** Raymond Andrews	**Reviewed Date:** 06/27/2024
At the time of inspection, I reviewed the facility's Monthly Routine Inspection Reports from January 2021 through December 2023. I did not note any areas of concern.		
Record: Personnel Training		**AOC:** No
Ref #: RA1-RR-005	**Reviewed By:** Raymond Andrews	**Reviewed Date:** 06/27/2024
At the time of inspection, I reviewed annual employee training records from 2020 through 2024. I did not note any areas of concern.		
Record: Facility Map		**AOC:** No
Ref #: RA1-RR-004	**Reviewed By:** Raymond Andrews	**Reviewed Date:** 06/27/2024
At the time of the inspection, I reviewed the facility's site maps. I did not note any areas of concern.		
Record: SWPPP		**AOC:** Yes
Ref #: RA1-RR-003	**Reviewed By:** Raymond Andrews	**Reviewed Date:** 06/27/2024
At the time of the inspection, I reviewed the facility's Stormwater Pollution Prevention Plan (SWPPP), dated October 9,2020. SWPPP needs to be updated because it includes a discussion on the storage and use of urea which the facility no longer uses for routine de-icing operations. A small supply is maintained in case the facility is unable to acquire its current deicer, New Deal.		

Record: Other - Alaska Department of Environmental Conservation (ADEC) Letter of Authorization		**AOC:** No
Ref #: RA1-RR-002	**Reviewed By:** Raymond Andrews	**Reviewed Date:** 06/27/2024
At the time of the inspection, I reviewed the ADEC Letter of Authorization, dated November 30, 2020, authorizing permit coverage under Sector S - Air Transportation of the state's Multi-Sector General Permit (MSGP).		
Record: Other - EPA's Integrated Compliance Information System (ICIS) Database		**AOC:** Yes
Ref #: RA1-RR-001	**Reviewed By:** Raymond Andrews	**Reviewed Date:** 06/27/2024
At the time of the inspection, I pulled a "violations" report from the ICIS database covering June 2019 through May 2024. The report shows the facility did not submit Annual Reports for 2020 - 2023.		

SECTION IV – Sampling activities
No sampling was conducted.

SECTION V – Areas of Concern
Area(s) of Concern may not be in sequential order.
The presentation of Area(s) of Concern does not constitute a formal compliance determination or violation.

AOC Reference #: RA1-RR-001	**Records Review: Other - EPA's Integrated Compliance Information System (ICIS) Database**
Permit Requirement Part 9.2 of the permit states, in part, "A permittee must submit an annual report to DEC that includes the findings from their Part 6.3 comprehensive site inspection and any corrective action documentation as required in Part 8.4."	
AOC: ICIS shows the facility did not submit Annual Reports for 2020 through 2023.	
AOC Reference #: RA1-RR-008	**Records Review: Other - Comprehensive Site Inspections**
Permit Requirement Part 1.12.5 of the permit states, "Any person signing a document under Appendix A, Part 1.12.2 or Part 1.12.3 shall certify as follows: "I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."	
AOC: The inspection reports were signed but did not contain the certification required by the permit.	

AOC Reference #: RA1-RR-007	Records Review: Other - Quarterly Visual Assessments (QVAs)
Permit Requirement Part 1.12.5 of the permit states, "Any person signing a document under Appendix A, Part 1.12.2 or Part 1.12.3 shall certify as follows: "I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."	
AOC: The QVAs were signed by the appropriate person but they did not include the certification statement required by the permit.	

AOC Reference #: RA1-RR-007	Records Review: Other - Quarterly Visual Assessments (QVAs)
Permit Requirement Part 6.2.2 of the permit states, in part, "...the permittees documentation of the visual assessment must include...Photographs of sample and sample location...	
AOC: The following QVAs did not include the photographs required by the permit. The QVAs missing the photographs were: 2Q2022, 3Q2022, 4Q2022, 1Q2023, 2Q2023, 3Q2023, 4Q2023, 2Q2024.	

AOC Reference #: RA1-RR-003	Records Review: SWPPP
Permit Requirement Part 5.6.5 of the permit states, in part, "The SWPPP must be updated at least annually."	
AOC: The SWPPP was not being updated annually.	

AOC Reference #: RA1-RR-009	Records Review: Other - MSGP Annual Reporting Forms
Permit Requirement Part 9.2 of the permit states, in part, "A permittee must submit an annual report to DEC...the permittee must include the following information with their annual report...Facility name...APDES permit tracking number..."	
AOC: The Annual Reports were missing the APDES Permit Tracking Number and the forms for 2023 and 2024 did not include the full facility name.	

SECTION VI – Closing conference

I held a closing conference with Facility personnel at 02:05 PM (PT) on 06/27/2024 for the inspection. During the closing conference, I discussed the observations and Area(s) of Concern I identified during the inspection. Observations and Area(s) of Concern have not yet been evaluated for a formal compliance determination.

SECTION VII – List of Appendices

1. Photo Log

APPENDIX 1: Photo Log

All photos were taken by Lead EPA Inspector, Ray Andrews, during the inspection.

Photos were not manipulated beyond minor cropping for sizing and labels or callouts to draw attention to the subject of the photo.

All photos taken during the inspection are included in the Photo Log; however, only photos that support an Observation or Area of Concern are included in the inspection report.

- **P1010983** – Outfall A, photo 1
- **P1010984 –** Outfall A, photo 2
- **P1010985 –** Under Road Culvert
- **P1010986 –** Outfall B
- **P1010987 –** SWPPP, page 7
- **P1010988 –** SWPPP, page 9
- **P1010989 –** Site Map, photo 1
- **P1010990 –** Site Map, photo 2
- **P1010991 –** Example Employee Training Documentation, 2023
- **P1010992 –** Monthly Routine Inspection Report, December 2023
- **P1010993 –** Quarterly Visual Documentation, photo 1
- **P1010994 –** Quarterly Visual Documentation, photo 2
- **P1010995 –** Quarterly Visual Documentation, photo 3