

REGION 10 Enforcement Division

INSPECTION REPORT

Inspection Date(s):	08/26/2021 - 08/26/2021	Announced: No	
Time:	Entry: 08:03 AM (AKT)	Exit: 02:40 PM (AKT)	
Program:	RCRA		
Regulatory Program(s):	Title 40 - ENVIRONMENTAL PROTECTION AGENCY; ALASKA STATE REGULATIONS		
If Access is Denied:			
Company Name:	State of Alaska Department of Transportation and Public Facilities (Alaska DOT & PF)		
Facility or Site Name:	ALASKA DOT & PF PEGER ROAD		
Facility/Site Physical Address:	2301 PEGER RD		
(City, state, zip code)	FAIRBANKS, AK 99709		
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:	40 acres		
Length of Facility at Location:	Since late 1960's		
Geographic Coordinates:	64.826138, -147.772883		
Mailing address: (Secondary Address)	Mr. Sam Myers Environmental Specialist, Northern Region (NR) Maintenance & Operations 2301 Peger Road Fairbanks, AK 99709 sam.myers@alaska.gov CC: Mr. Daniel Adamczak, Maintenance & Operations Engineer, NR daniel.adamczak@alaska.gov		
(City, state, zip code)	Fairbanks, AK 99709		
County:			
Facility/Site Identifier:	AKD983075458		
Media Number:			
NAICS:	488490 – Other Support Activities for Road Transportation		
Lead Inspector:			
Jon Jones	Jones, Jon	Digitally signed by Jones, Jon Date: 2021.10.21 09:11:19 -08'00'	
	REGION 10	Jones.Jon@epa.gov	(907) 271-6329
Supervisor Review:			
Jen Sullivan	Jennifer A Sullivan	Digitally signed by Jennifer A Sullivan Date: 2021.10.21 14:38:28 -07'00'	
	REGION 10	Sullivan.Jennifer.A@epa.gov	(206) 553-6978

SECTION I – INTRODUCTION**Purpose of the Inspection/Objective**

Type of inspection: FCI - Focused Compliance Inspection

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 to determine what changes had taken place at the facility since the last RCRA compliance inspection on September 27, 2018.

Attendees

Title	Name	Phone	Email	Present in Opening Conf.	Present in Closing Conf.
Lead Inspector	Jon Jones	(907) 271-6329	Jones.Jon@epa.gov	Yes	Yes
Environmental Specialist NR Maintenance & Operations	Sam Myers	(907) 451-5291	sam.myers@alaska.gov	Yes	Yes
Maintenance & Operations Engineer, Northern Region	Daniel Adamczak, P.E.	(907) 451-2294	daniel.adamczak@alaska.gov	Yes	Yes

Opening Conference

EPA Lead Inspector Jon Jones arrived at the ALASKA DOT & PF PEGER ROAD at 08:03 AM (AKT) on 08/26/2021 for an inspection. I presented my credentials to Sam Myers and Daniel Adamczak and informed them that this was an EPA RCRA inspection. The table above presents all the inspection 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 Messrs. Myers and Adamczak.

Facility/Site Description

Alaska Department of Transportation& Public Facilities (Alaska DOT & PF) Peger Road has been at its present location since the late 1960s. Additional information about the facility can be found on the facility's website at http://dot.alaska.gov/stwdmno/mno_nr.shtml

Facility Info

Number of employees	300
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Weather Conditions	Clear and sunny
Operating Hours	7:00 a.m. to 5:00 p.m.
Safety Training Provided to Inspector(s)?	No
What type of generator facility notified?	Small Quantity Generator (SQG)
What type of generator facility verified as?	SQG verified by Sam Myers

Process Description

Mr. Myers and Mr. Adamczak clarified verbally that the facility had made the following changes in the way that wastes were being managed at the facility as opposed to the way they had been previously managed during the last RCRA compliance inspection on September 27, 2018.

- The facility no longer accepts waste from other locations.
- The facility no longer brings waste to the site for waste characterization.
- The facility no longer manages waste aerosols as hazardous waste. They now manage the waste as universal waste, then puncturing and managing the waste aerosol residue and liquids as hazardous waste.
- Waste lamps (LED, Low mercury fluorescent tubes -either 8- or 4- foot lamps) are now disposed of in the garbage (onsite trash dumpster).
- Waste batteries - lead acid and lithium. Managed as one for one turn-in locally for the lead acid vehicle batteries. Lithium batteries managed as universal waste and disposed of at the local Battery+Bulbs store.
- Propane gas cylinders - currently working with NRC (US Ecology) for disposal.
- Used highway paint and liquids generated from cleaning painting equipment is put into paint totes and shipped back to the manufacturer to be used as product to make more paint.
- Used oil is managed onsite in an onsite used oil burning space heater in the SEF Maintenance Shop as well as in the M&O large warm storage facility.

Mr. Myers and Mr. Adamczak clarified verbally that the facility notified as an SQG, but their normal monthly generator status is that of a Very Small Quantity Generator (VSQG).

We discussed waste management options for VSQG's as well as episodic generation.

Building(s)

Building/Area/Sub-area	Process Description	Area of Concern
Bridge and Drilling Shop		No
UWAA	Accumulation area for aerosols	No
Cat House		No
Drum Storage Area (CAA)		No
Environmental Office	Universal waste accumulation area (UWAA) for waste batteries	No

Facility Services	Multi- purpose bldg. with various offices	No
Shop	UWAA for aerosols	No
Hazmat Recycling Area		Yes
Heavy Equipment / Warm Storage		No
Welding Shop	UWAA for aerosols	No
Large Warm Storage		Yes
Materials Lab		No
State Equipment Fleet (SEF) Maintenance Shop		Yes
Heavy Equipment side	UWAA for aerosols	No
Light Duty Shop		Yes
Outside the building, on the north side	UWAA for aerosols	No

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

Building: Bridge and Drilling Shop/UWAA	Contains CBI: No
Observation #: JJ1-OB-007	Date: 08/26/2021
At the time of the inspection, the facility was utilizing a 55-gallon container for accumulating aerosol cans which the facility manages as universal waste. During the inspection, the container was labeled, closed and empty.	
Photo(s)	
1. Observation Image-2021082610494349431588457.jpg	

Building: Drum Storage Area (CAA)	Contains CBI: No
Observation #: JJ1-OB-008	Date: 08/26/2021
While inspecting the Drum Storage Area, Mr. Myers said he keeps a 55-gallon container just outside the gate entrance to the CAA for the accumulation of aerosol cans which are managed as universal waste. Mr. Myers said that it hardly ever gets used. At the time of the inspection, the container was empty.	
Mr. Myers stated that the only hazardous waste routinely generated at the facility now is the waste residue and liquids from puncturing the aerosol cans. Mr. Myers said he will typically generate a container of hazardous waste aerosol residue/liquids once a year.	
At the time of the inspection, the only wastes in accumulation were non-hazardous wastes consisting of oily water, POL contaminated soil, mixed glycols, and used urea (also known as Diesel Exhaust Fluid or “DEF”).	
Photo(s)	
1. Observation Image-202108261054035432197997.jpg	
2. Observation Image-2021082611101710171901115.jpg	
3. Observation Image-2021082611103410341622241.jpg	
4. Observation Image-2021082611104610461642003.jpg	
5. Ins-2021082611113211321842900.jpg	

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6. Ins-2021082611115111511630852.jpg
7. Ins-2021082611121112111453004.jpg
8. Ins-2021082611125012501985921.jpg

Building: Environmental Office	Contains CBI: No
Observation #: JJ1-OB-014	Date: 08/26/2021
During the inspection, there was an accumulation container for batteries outside of Mr. Myers's office. At the time of the inspection the 5-gallon container held one lead-acid battery. The facility manages batteries as universal waste.	
Photo(s) 1. Observation Image-202108261402552551451251.jpg	

Building: Facility Services/Shop	Contains CBI: No
Observation #: JJ1-OB-001	Date: 08/26/2021
At the time of the inspection there was a 55-gallon container that was being used to accumulate universal waste aerosol cans. At the time of the inspection the container was labeled with a universal waste label and was empty.	
Photo(s) 1. Observation Image-2021082609263426341651677.jpg 2. Observation Image-2021082609264826481406688.jpg 3. Observation Image-202108260927032731046813.jpg	

Building: Hazmat Recycling Area	Contains CBI: No
Observation #: JJ1-OB-009	Date: 08/26/2021
When I arrived at the Hazmat Recycling Area (HRA), I saw a large, open plastic garbage containing waste aerosol cans that was laying in front of an 85-gallon overpack container that was being utilized to accumulate aerosol cans which the facility manages as universal waste. The plastic bag that contained the waste aerosol cans was not labeled as universal waste. According to Mr. Myers, someone, somewhere must have been accumulating them and then brought them out to the caged area. At the time of the inspection, the 85-gallon overpack container the facility was using to accumulate universal waste aerosols was empty. I also saw a 55-gallon container that was the same color as the 85-gallon overpack. It was labeled as hazardous waste and contained 35 waste propane cylinders. The container was labeled and was marked with a hazard indicator but was not closed. There was no drum ring on the container and the lid was not making a complete seal with the container.	
Photo(s) 1. Observation Image-2021082611233423341583542.jpg 2. Observation Image-2021082611241124111952610.jpg 3. Observation Image-2021082611242524251748329.jpg 4. Observation Image-2021082611303930391437204.jpg 5. Observation Image-2021082611305930591322587.jpg	

6. [Observation Image-2021082611312931291562883.jpg](#)

Building: Hazmat Recycling Area	Contains CBI: No
Observation #: JJ1-OB-010	Date: 08/26/2021
While in the HRA, I saw a 55-gallon satellite container of waste aerosol can residue/liquid that had been collected from punctured aerosol cans. I tapped on the container to determine the level of waste in the container and determined that it was approximately 1/3 full. Mr. Myers confirmed that it was 1/3 full. The container was closed, labeled as hazardous waste, and was marked with a hazard indicator. Mr. Myers stated that ADOT&PF had been accumulating the hazardous waste in this satellite container since 2019.	
Photo(s) 1. Observation Image-2021082613134513451654288.jpg	

Building: Hazmat Recycling Area	Contains CBI: No
Observation #: JJ1-OB-011	Date: 08/26/2021
While still at the HRA, I saw two eight-foot cardboard fluorescent lamp boxes. According to Mr. Myers, the boxes held the old style waste fluorescent lamps that contain the higher level of mercury. Mr. Myers stated that they manage waste lamps as universal waste. At the time of the inspection, the two boxes of waste lamps were taped together. Both of the boxes were labeled as Universal Waste-Lamps; however, the top box was not structurally sound and the bottom box was not closed. The top box had a plastic bag covering one end that was taped to the box, where part of the cardboard was missing, and the bottom box was open on both ends. The date the lamps first became a waste was marked on the universal waste labels as 6/29/21. Following the inspection, Mr. Myers provided photo documentation showing that the lamp containers had been repaired or replaced. The documentation is included as an attachment to the report.	
Photo(s) 1. Observation Image-2021082613242224221232401.jpg 2. Observation Image-2021082613244724471427631.jpg 3. Observation Image-2021082613252225221518967.jpg 4. Ins-2021082613255725571291075.jpg	

Building: Hazmat Recycling Area	Contains CBI: No
Observation #: JJ1-OB-012	Date: 08/26/2021
While still in the HRA, I saw six waste spray foam cylinders. Mr. Myers told me they froze over the winter and need to be disposed. Mr. Myers said he needed to make a waste determination and would research the SDS for guidance on disposal.	
Photo(s) 1. Observation Image-2021082613385838581589651.jpg	

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2. [Observation Image-2021082613391139111135660.jpg](#)
3. [Observation Image-2021082613392639261460357.jpg](#)

Building: Hazmat Recycling Area	Contains CBI: No
Observation #: JJ1-OB-013	Date: 08/26/2021
While still in the HRA, I saw an 85-gallon poly overpack container that held a 55-gallon container of an unknown solvent. According to Mr. Myers, someone thought it was acetone and marked the container as such. The container was labeled with the words "Hazardous Waste" and an ASD of 2/20/21. The container was also marked with a hazard indicator. According to Mr. Myers the container is full. Mr. Myers said he had analytical data for the solvent and he provided me with a copy which is included with this report (See records review JJ1-RR-001).	
Photo(s) 1. Observation Image-202108261352055251661776.jpg 2. Observation Image-2021082613525152511158510.jpg 3. Observation Image-202108261353085381303518.jpg	

Building: Heavy Equipment / Warm Storage/Welding Shop	Contains CBI: No
Observation #: JJ1-OB-003	Date: 08/26/2021
At the time of the inspection, the facility was utilizing a 55-gallon container for the accumulation of aerosol cans. There was one aerosol in the container and the container was closed and labeled as universal waste.	
Photo(s) 1. Observation Image-202108261009179171467969.jpg	

Building: Large Warm Storage	Contains CBI: No
Observation #: JJ1-OB-002	Date: 08/26/2021
At the time of the inspection, there was a 55-gallon container that was being used to accumulate aerosol cans. There were two aerosol cans inside the container and the container was labeled with a universal waste label. There was an additional 55-gallon container in the same area that was also being utilized as an accumulation container for aerosol cans. At the time of the inspection, the container was labeled, closed and empty. At the time of the inspection, in the shop area of the large warm storage, I saw four 5-gallon containers and one 55-gallon container that, according to Mr. Myers, both contained used oil. The five containers were not labeled with the words "Used Oil." Mr. Myers pointed out that the funnel on the container was labeled with the words used oil; however, the container upon which the funnel had been placed was not labeled with the words used oil. Following the inspection, Mr. Myers provided photo documentation showing that the containers had been labeled with the words, "Used Oil." The documentation is included as an attachment to the report.	
Photo(s)	

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1. [Observation Image-2021082609404040401203343.jpg](#)
2. [Observation Image-2021082609405140511395605.jpg](#)
3. [Observation Image-2021082609424742471201705.jpg](#)
4. [Observation Image-2021082609465546551370126.jpg](#)
5. [Observation Image-2021082609541054101623733.jpg](#)
6. [Observation Image-2021082609545054501623029.jpg](#)
7. [Observation Image-2021082609552555251641182.jpg](#)
8. [Observation Image-2021082609593959391626867.jpg](#)

Building: State Equipment Fleet (SEF) Maintenance Shop/Heavy Equipment side **Contains CBI:** No

Observation #: JJ1-OB-004

Date: 08/26/2021

At the time of the inspection, I saw a 55-gallon container that was being used to accumulate waste aerosols. During the inspection, it was labeled with a universal waste label; however, the container was empty.

Photo(s)

1. [Observation Image-2021082610213221321747534.jpg](#)

Building: State Equipment Fleet (SEF) Maintenance Shop/Light Duty Shop **Contains CBI:** No

Observation #: JJ1-OB-005

Date: 08/26/2021

At the time of the inspection, I saw a 5-gallon container that was connected to and accumulating used oil from a used oil filter crusher. The 5-gallon container of used oil was not labeled with the words, "Used Oil."

Mr. Adamczak labeled the container with a used oil label during the inspection.

Photo(s)

1. [Observation Image-2021082610285428541600744.jpg](#)
2. [Observation Image-2021082610291929191787991.jpg](#)
3. [Observation Image-2021082610312331231628620.jpg](#)

Building: State Equipment Fleet (SEF) Maintenance Shop/Light Duty Shop/Outside the building, on the north side **Contains CBI:** No

Observation #: JJ1-OB-006

Date: 08/26/2021

At the time of the inspection, the facility was utilizing a 55-gallon container to accumulate aerosol cans which the facility manages as universal waste. The container was labeled, closed, and contained approximately 16 aerosol cans.

Photo(s)

1. [Observation Image-2021082610383338331078153.jpg](#)
2. [Observation Image-202108261039023921372808.jpg](#)
3. [Observation Image-2021082610392739271390638.jpg](#)

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Records Review

Record: Inspections		AOC: Yes
Ref #: JJ1-RR-001	Reviewed By: Jon Jones	Reviewed Date: 09/08/2021
At the time of the inspection, there was a 55-gallon container full of waste solvent in the Hazmat Recycling Area that had an accumulation start date of 2/20/21. Analytical data for the waste solvent indicated that it was ignitable, having a flashpoint of <70 F. Mr. Myers did not provide any records of hazardous waste inspections in response to EPA's request for all hazardous waste inspection records for the time period of 8/26/18-8/26/2021. The facility had no records of conducting weekly hazardous waste inspections for the 55-gallon container of waste solvent during the 27 weeks since it was identified as a hazardous waste on 2/20/21.		
Document(s)		
1. Waste solvent analysis 1213954.pdf		

SECTION III – AREAS OF CONCERN

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

Building:	Area:	Sub-area:
JJ1-RR-001		
The facility had not conducted weekly hazardous waste inspections for the 55-gallon container of waste solvent, located in the Hazmat Recycling Area, since it was identified as a hazardous waste on 2/20/21. At the time of the inspection, the container had been in storage for 27 weeks.	Citations:	Sections:
Building: Hazmat Recycling Area	Area:	Sub-area:
JJ1-OB-009		
There was a plastic bag that contained waste aerosol cans and was not labeled as universal waste.	Citations:	Sections:
There was an 85-gallon overpack container that held	Citations:	Sections:

waste propane cylinders and the container was not closed. There was no drum ring on the container and the lid was not making a complete seal with the container.		
JJ1-OB-011		
There was a cardboard box containing eight-foot waste fluorescent lamps that was not structurally sound and there was a second cardboard box containing eight-foot waste fluorescent lamps that was not closed.	Citations:	Sections:
Building: Large Warm Storage	Area:	Sub-area:
JJ1-OB-002		
There were a total of five containers, four 5-gallon and one 55-gallon, that held used oil but were not labeled with the words, "Used Oil."	Citations:	Sections:
Building: State Equipment Fleet (SEF) Maintenance Shop	Area: Light Duty Shop	Sub-area:
JJ1-OB-005		
There was a 5-gallon container that held used oil and the container was not labeled with the words, "Used Oil."	Citations:	Sections:

SECTION IV – FOLLOW UP

N/A

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 at the facility. We discussed very small quantity generator (VSQG) requirements and episodic generation. I then explained the follow-up process that would take place after the inspection.

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

[Title] 08/26/2021 11:11 AM (AKT) Jon Jones Drum Storage Area (CAA) No CBI No PII View of the area around the blue Connex.	
[Title] 08/26/2021 11:11 AM (AKT) Jon Jones Drum Storage Area (CAA) No CBI No PII Another view of the CAA.	

[Title] 08/26/2021 11:12 AM (AKT) Jon Jones Drum Storage Area (CAA) No CBI No PII A view of the Connex in the CAA.	
[Title] 08/26/2021 11:12 AM (AKT) Jon Jones Drum Storage Area (CAA) No CBI No PII View of the area around the entrance to the CAA.	
[Title] 08/26/2021 01:25 PM (AKT) Jon Jones Hazmat Recycling Area No CBI No PII View of two cardboard boxes that contain eight-foot waste fluorescent lamps. The top box has a plastic bag covering one end that was taped together and the bottom box was open on both ends.	

[Title] 08/26/2021 10:49 AM (AKT) Jon Jones Bridge and Drilling Shop/UWAA No CBI No PII View of 55-gallon container for accumulating waste aerosol cans which the facility manages as universal waste.	
[Title] 08/26/2021 10:54 AM (AKT) Jon Jones Drum Storage Area (CAA) No CBI No PII View of the entrance to the Drum Storage Area.	
[Title] 08/26/2021 11:10 AM (AKT) Jon Jones Drum Storage Area (CAA) No CBI No PII View of the waste in the CAA. Wastes in accumulation were non-hazardous wastes consisting of oily water, POL soil, mixed glycols, used urea (DEF).	

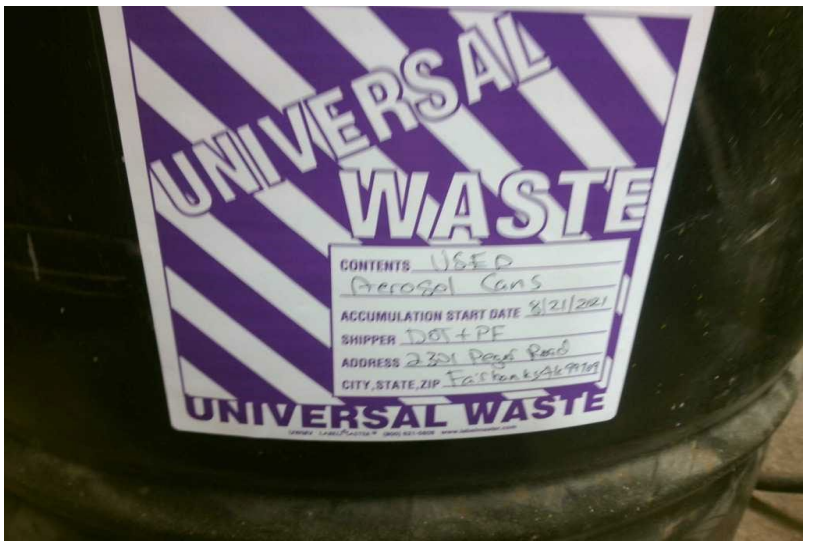
Inspection Date(s):

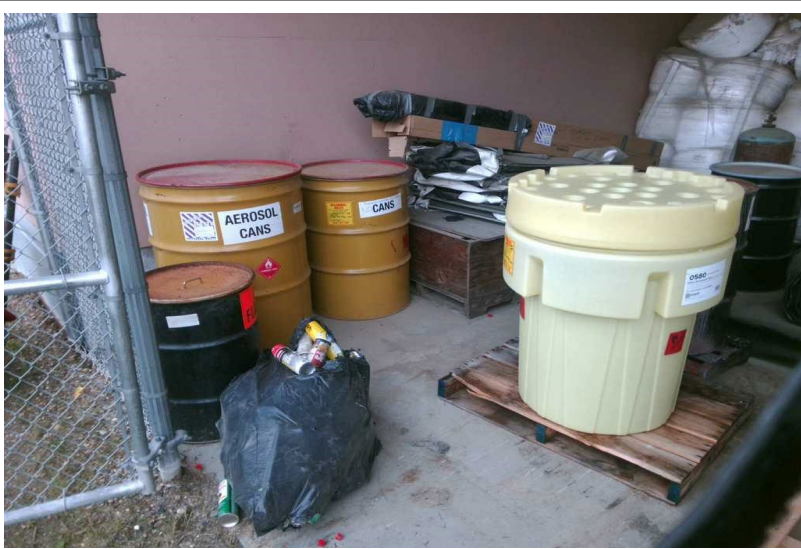
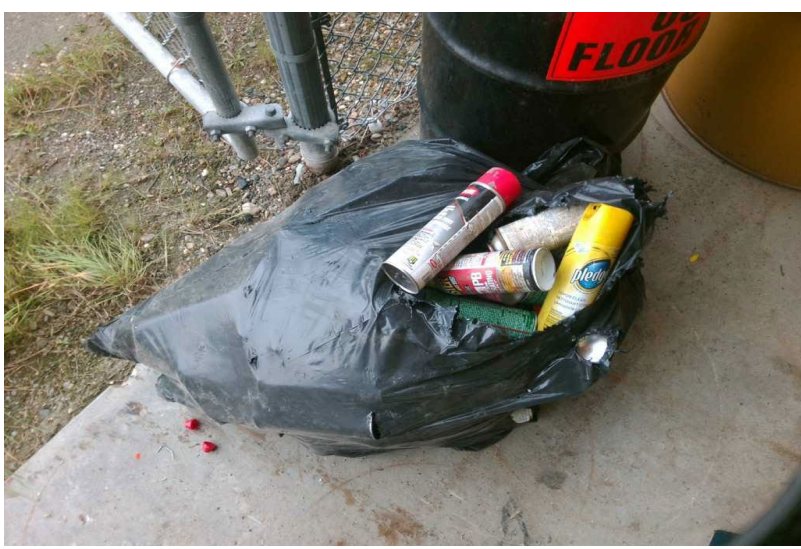
08/26/2021 - 08/26/2021

[Title] 08/26/2021 11:10 AM (AKT) Jon Jones Drum Storage Area (CAA) No CBI No PII Another view of the waste in the CAA. Wastes in accumulation were non-hazardous wastes consisting of oily water, POL soil, mixed glycols, used urea (DEF).	
[Title] 08/26/2021 11:10 AM (AKT) Jon Jones Drum Storage Area (CAA) No CBI No PII Another view of the waste in the CAA. Wastes in accumulation were non-hazardous wastes consisting of oily water, POL soil, mixed glycols, used urea (DEF).	
[Title] 08/26/2021 02:02 PM (AKT) Jon Jones Environmental Office No CBI No PII View of a universal waste battery container located just outside of Mr. Myers's office.	

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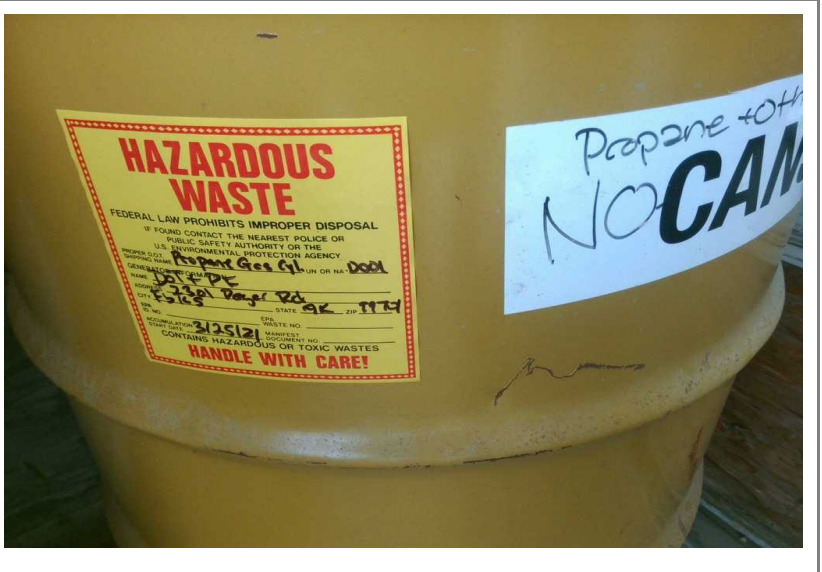
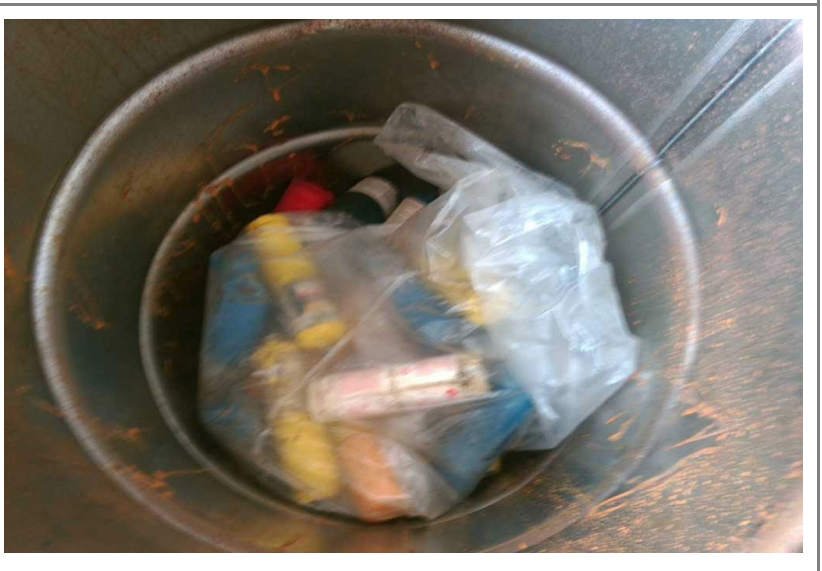
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[Title] 08/26/2021 09:26 AM (AKT) Jon Jones Facility Services/Shop No CBI No PII View of a 55-gallon container being used to accumulate universal waste aerosol cans.	
[Title] 08/26/2021 09:26 AM (AKT) Jon Jones Facility Services/Shop No CBI No PII Close-up view of the labeling on the container.	
[Title] 08/26/2021 09:27 AM (AKT) Jon Jones Facility Services/Shop No CBI No PII Close-up view of the universal waste label.	

[Title] 08/26/2021 11:23 AM (AKT) Jon Jones Hazmat Recycling Area No CBI No PII View of the garbage bag that contains waste aerosol cans.	
[Title] 08/26/2021 11:24 AM (AKT) Jon Jones Hazmat Recycling Area No CBI No PII Close-up view of the garbage bag containing waste aerosol cans.	
[Title] 08/26/2021 11:24 AM (AKT) Jon Jones Hazmat Recycling Area No CBI No PII View of an 85-gallon overpack container for the accumulation of waste aerosols. During the inspection, this container was empty.	

Inspection Date(s):

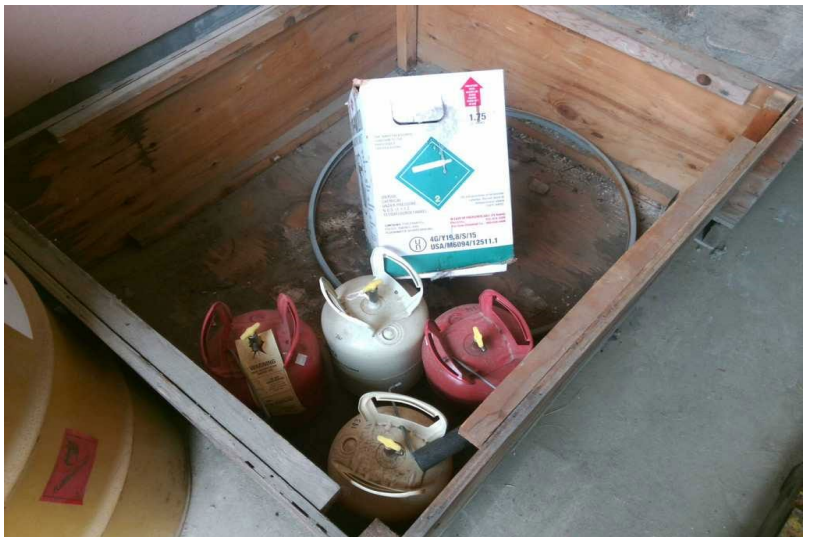
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[Title]	
08/26/2021 11:30 AM (AKT)	
Jon Jones	
Hazmat Recycling Area	
No CBI	
No PII	
View of a 55-gallon container that was labeled as hazardous waste and contained 35 waste propane cylinders. The container was labeled and was marked with a hazard indicator but was not closed. There was no drum ring on the container and the lid was not making a complete seal with the container.	
[Title]	
08/26/2021 11:30 AM (AKT)	
Jon Jones	
Hazmat Recycling Area	
No CBI	
No PII	
Close-up view of the container label.	
[Title]	
08/26/2021 11:31 AM (AKT)	
Jon Jones	
Hazmat Recycling Area	
No CBI	
No PII	
View of the waste propane cylinders in the container.	

[Title] 08/26/2021 01:13 PM (AKT) Jon Jones Hazmat Recycling Area No CBI No PII View of a 55-gallon container in use for accumulation of waste aerosol can residue/liquid.	
[Title] 08/26/2021 01:24 PM (AKT) Jon Jones Hazmat Recycling Area No CBI No PII View of two cardboard boxes that contain eight-foot waste fluorescent lamps. The top box has a plastic bag covering one end that was taped together and the bottom box was open on both ends.	
[Title] 08/26/2021 01:24 PM (AKT) Jon Jones Hazmat Recycling Area No CBI No PII Another view of two cardboard boxes that contain eight-foot waste fluorescent lamps. The top box has a plastic bag covering one end that was taped together and the bottom box was open on both ends.	

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[Title] 08/26/2021 01:25 PM (AKT) Jon Jones Hazmat Recycling Area No CBI No PII Close-up view of the label on the two cardboard boxes that contain eight-foot waste fluorescent lamps.	
[Title] 08/26/2021 01:38 PM (AKT) Jon Jones Hazmat Recycling Area No CBI No PII View of six (four loose cylinders, two in box), waste spray foam cylinders. Mr. Myers told me they froze over the winter and need to be disposed. Mr. Myers said he needed to make a waste determination and would research the SDS for guidance on disposal.	
[Title] 08/26/2021 01:39 PM (AKT) Jon Jones Hazmat Recycling Area No CBI No PII Close-up view of the labeling on the box of spray foam cylinders.	

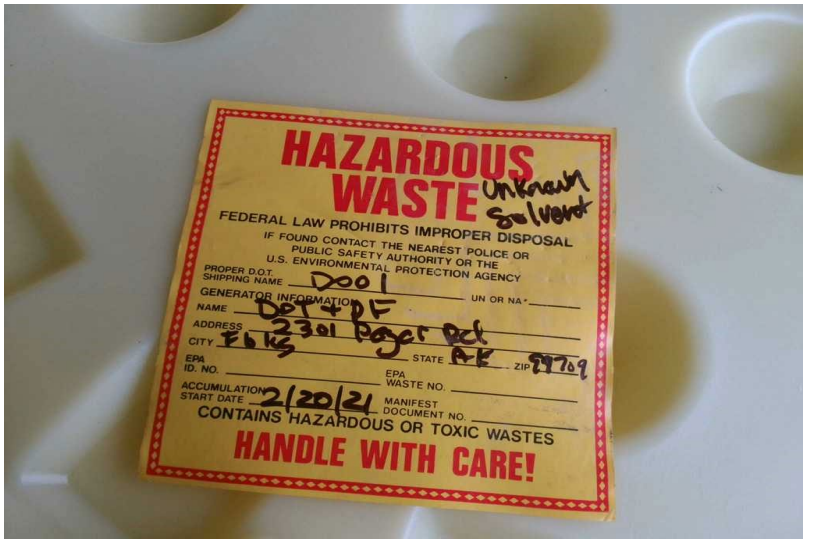
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[Title] 08/26/2021 01:39 PM (AKT) Jon Jones Hazmat Recycling Area No CBI No PII Another close-up view of the labeling on the box of spray foam cylinders.	
[Title] 08/26/2021 01:52 PM (AKT) Jon Jones Hazmat Recycling Area No CBI No PII View of 85-gallon poly overpack container that's holding a 55-gallon container of an unknown solvent.	
[Title] 08/26/2021 01:52 PM (AKT) Jon Jones Hazmat Recycling Area No CBI No PII Another view of 85-gallon poly overpack container that's holding a 55-gallon container of an unknown solvent.	

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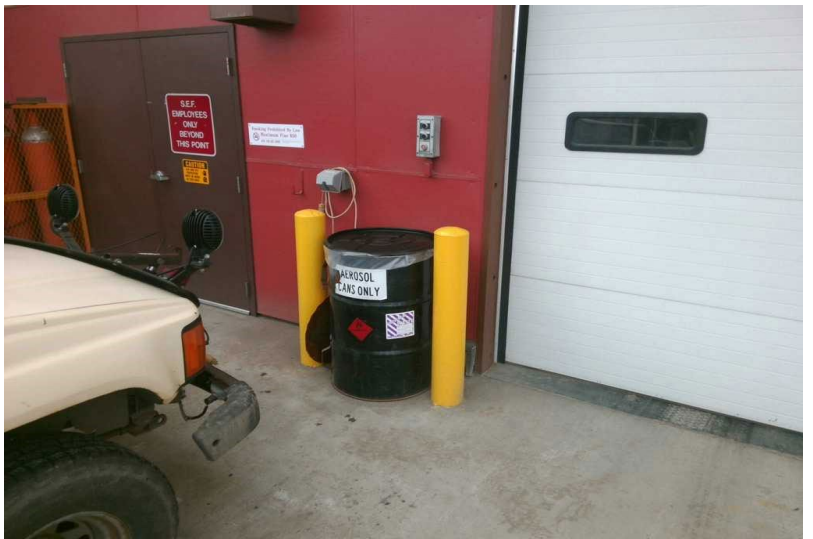
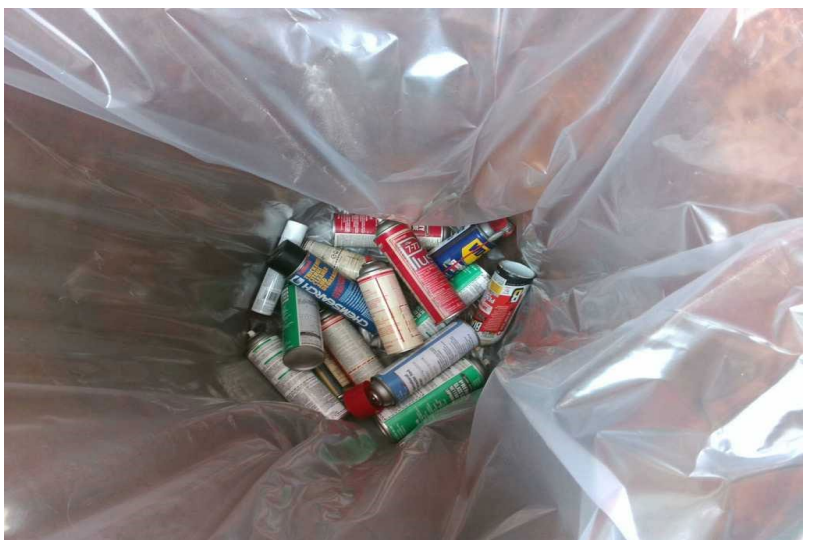
[Title] 08/26/2021 01:53 PM (AKT) Jon Jones Hazmat Recycling Area No CBI No PII Close-up view of the label on 85-gallon poly overpack container that's holding a 55-gallon container of an unknown solvent.	
[Title] 08/26/2021 10:09 AM (AKT) Jon Jones Heavy Equipment / Warm Storage/Welding Shop No CBI No PII View of a 55-gallon container for the accumulation of waste aerosol cans. There was one aerosol in the container and the container was closed and labeled as universal waste.	
[Title] 08/26/2021 09:40 AM (AKT) Jon Jones Large Warm Storage No CBI No PII View of a 55-gallon container that was being utilized as an accumulation container for waste aerosol cans.	

[Title] 08/26/2021 09:40 AM (AKT) Jon Jones Large Warm Storage No CBI No PII View of two aerosol cans inside the container.	
[Title] 08/26/2021 09:42 AM (AKT) Jon Jones Large Warm Storage No CBI No PII Another view of the same container, seen in the previous photo, with the lid placed on the container.	
[Title] 08/26/2021 09:46 AM (AKT) Jon Jones Large Warm Storage No CBI No PII View of an additional 55-gallon container in the same area that was also being utilized as an accumulation container for waste aerosol cans.	

[Title] 08/26/2021 09:54 AM (AKT) Jon Jones Large Warm Storage No CBI No PII View of the five containers that were not labeled with the words "Used Oil."	
[Title] 08/26/2021 09:54 AM (AKT) Jon Jones Large Warm Storage No CBI No PII Another view of the five containers that were not labeled with the words "Used Oil."	
[Title] 08/26/2021 09:55 AM (AKT) Jon Jones Large Warm Storage No CBI No PII Another view of the five containers that were not labeled with the words "Used Oil."	

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[Title] 08/26/2021 09:59 AM (AKT) Jon Jones Large Warm Storage No CBI No PII View of the funnel on top of the 55-gallon container.	
[Title] 08/26/2021 10:38 AM (AKT) Jon Jones Light Duty Shop/Outside the building, on the north side No CBI No PII View of a 55-gallon container used to accumulate waste aerosol cans. The container was labeled, closed, and contained approximately 16 aerosol cans.	
[Title] 08/26/2021 10:39 AM (AKT) Jon Jones Light Duty Shop/Outside the building, on the north side No CBI No PII View of the waste aerosols inside the container.	

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[Title] 08/26/2021 10:39 AM (AKT) Jon Jones Light Duty Shop/Outside the building, on the north side No CBI No PII Close-up view of the container label.	
[Title] 08/26/2021 10:21 AM (AKT) Jon Jones State Equipment Fleet (SEF) Maintenance Shop/Heavy Equipment side No CBI No PII View of a 55-gallon container prepared for use to accumulate waste aerosols. The container is seen here with a universal waste label.	
[Title] 08/26/2021 10:28 AM (AKT) Jon Jones State Equipment Fleet (SEF) Maintenance Shop/Light Duty Shop No CBI No PII View of the oil filter crusher.	

[Title]	
08/26/2021 10:29 AM (AKT)	
Jon Jones	
State Equipment Fleet (SEF) Maintenance Shop/Light Duty Shop	
No CBI	
No PII	
View of a 5-gallon container that was connected to and accumulating used oil from a used oil filter crusher. The 5-gallon container of used oil is not labeled with the words, "Used Oil."	
[Title]	
08/26/2021 10:31 AM (AKT)	
Jon Jones	
State Equipment Fleet (SEF) Maintenance Shop/Light Duty Shop	
No CBI	
No PII	
View of the used oil container after Mr. Adamczak labeled the container with a used oil label.	

Document Log

Document Type	Document Name	Contains CBI	Contains PII	Uploaded By	Date Received
Records Review	Waste solvent analysis 1213954.pdf	No	No	Jon Jones	09/08/2021
Inspection Reports	Field_Notes_AKD983075458v1.0.pdf	No	No	Jon Jones	10/13/2021
Facility Map	Peger Map - DOT&PF.pdf	No	No	Jon Jones	10/14/2021
Other - Photo of used oil containers after being labeled	Large Warm Storage Drums_Labled.jpg	No	No	Jon Jones	10/14/2021
Communications	Photo of Labeled Drum & (4) 5-G Buckets - DOT LWS Shop.pdf	No	No	Jon Jones	10/14/2021
Communications	Fluorescent Tube Box Repair Photos.pdf	No	No	Jon Jones	10/14/2021
Other - Photo of repaired UW lamp	Bulb01.jpg	No	No	Jon Jones	10/14/2021

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container					
Other - Photo of repaired UW lamp container	Bulb02.jpg	No	No	Jon Jones	10/14/2021
Communications	RE_ Requested Map and Test Results2.pdf	No	No	Jon Jones	10/14/2021
Other - Weekly inspection checklist	Weekly HazWaste Inspection Checklist.docx	No	No	Jon Jones	10/14/2021
Communications	RE_ Requested Map and Test Results.pdf	No	No	Jon Jones	10/14/2021
Other - UW FedRegister	2019-25674.pdf	No	No	Jon Jones	10/14/2021
Other - Aerosolv instructions	Aerosolv-Aerosol-Can-Recycling-Instructions.pdf	No	No	Jon Jones	10/14/2021
Other - EPA UW Training Module	uwast05.pdf	No	No	Jon Jones	10/14/2021