

REGION 10 Enforcement Division

INSPECTION REPORT

Inspection Date(s):	04/12/2022 - 04/12/2022	Announced: No	
Time:	Entry: 08:43 AM (AKT)	Exit: 04:05 PM (AKT)	
Program:	RCRA		
Regulatory Program(s):	Title 40 - ENVIRONMENTAL PROTECTION AGENCY		
If Access is Denied:			
Company Name:	University of Alaska		
Facility or Site Name:	University of Alaska SE Auke Lake Campus		
Facility/Site Physical Address:	11066 Auke Lake Way		
(City, state, zip code)	Juneau, AK 99801		
Type of Operation:	University		
Size of Facility:	Unknown		
Length of Facility at Location:	Since late 60's, when it began as a community college		
Geographic Coordinates:	58.384125, -134.638331		
Mailing address: (Secondary Address)	Daniel J. Garcia, Facility Services Health and Safety Manager 11066 Auke Lake Way Juneau, AK 99801 (907) 796-6077 digarcia@alaska.edu		
(City, state, zip code)	Juneau, AK 99801		
County:	City and Borough of Juneau		
Facility/Site Identifier:	AKD983069626		
Media Number:	N/A		
NAICS:	611310 – Colleges, Universities, and Professional Schools		
Lead Inspector:			
Jon Jones			
	REGION 10	Jones.Jon@epa.gov	(907) 271-6329
Additional Persons Participating in Inspection:			
Supervisor Review:			
Jen Sullivan			
	REGION 10	Sullivan.Jennifer.A@epa.gov	

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

Type of inspection: CEI - Compliance Evaluation 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 as part of a Core Program requirement for FY 2022.

Attendees

Title	Name	Phone	Email	Present in Opening Conf.	Present in Closing Conf.
Lead Inspector	Jon Jones	9072716329	Jones.Jon@epa.gov	Yes	Yes
Maintenance and Operations Manager	Adam Zenger	(907) 796-6511	azenger@alaska.edu	Yes	No
Health and Safety Manager	Daniel J. Garcia	(907) 796-6077	djgarcia@alaska.edu	Yes	Yes

Opening Conference

EPA Lead Inspector Jon Jones arrived at the University of Alaska SE Auke Lake Campus at 08:43 AM (AKT) on 04/12/2022 for an inspection. I presented my credentials to Daniel Garcia and informed him that this was an EPA RCRA inspection. The table above presents all the opening and closing conference inspection participants.

Facility/Site Description

The facility is a branch of the University of Alaska located northwest of downtown Juneau, AK. Additional information about the facility can be found at <https://uas.alaska.edu/>

Facility Info

Safety Training Provided to Inspector(s)?	No
Operating Hours	8:00 a.m. to 5:00 p.m., Monday through Friday
Weather Conditions	Sunny and cool
Number of employees	~290
What type of generator facility notified?	Very Small Quantity Generator (VSQG)
What type of generator facility verified as?	Verified VSQG by Daniel Garcia

Process Description

According to Messrs. Garcia and Zenger wastes generated on campus consist of the following:

- Waste fluorescent lamps (mix of four-foot lamps, eight-foot lamps and compact fluorescents- CFLs)
- Waste batteries - NiCad, Lithium, Lead-acid (both automotive and small power back-up batteries)
- Waste aerosols
- Waste acids & bases
- Waste solvents
- Toxic aqueous wastes
- Used oil
- Used antifreeze
- Absorbents contaminated with used oil - every other year-based on the number of spills. Occasional spill clean-ups (used oil in parking lots)
- Parts washer solvent- using Citrisolv - very rarely used

According to Messrs. Garcia and Zenger, they make an appointment at the local Household Hazardous Waste (HHW) facility and prior to the appointment they gather the waste from all the generation points. All the waste is taken to the HHW facility at the landfill with the exception of lead-acid batteries and used oil.

Used oil goes to businesses that burn used oil in their shops. Area businesses will contact the university to see if they have any used oil that they're willing to get rid of.

Lead-acid batteries are recycled through D&S recycling.

During the inspection of the facility, I was accompanied by Mr. Garcia.

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 used oil management. At the time of the inspection the facility was not managing any waste as universal waste. Specifically, I inspected the following areas of the facility listed below.

Building(s)

Building/Area/Sub-area	Process Description	Area of Concern
Anderson Building #15	Biology and chemistry classes.	No
Hazardous Materials Storage Shed	Wastes generated in the labs are accumulated here prior to being taken to the local HHW facility.	No
Room 309	Chemistry Lab	No
Egan Classroom Wing	Accumulation area for waste fluorescent lamps.	No
Room 300U1	Secondary location where waste fluorescent lamps and CFLs are accumulated.	No
Storage 118	Accumulation of waste fluorescent lamps.	No
Stover House	Automotive shop/garage	No

SECTION II – OBSERVATIONS AND RECORDS REVIEW

Observations

Building: Anderson Building #15/Hazardous Materials Storage Shed	Contains CBI: No
Observation #: JJ1-OB-004	Date: 04/12/2022
During the inspection, I inspected the waste being accumulated in the Hazardous Material shed.	
Photo(s) 1. IMG-20220412151808188856482.jpg 2. IMG-202204121519391939923883.jpg 3. IMG-202204121520172017973786.jpg 4. IMG-202204121520282028901597.jpg 5. IMG-202204121520342034807559.jpg	
Building: Anderson Building #15/Room 309	Contains CBI: No
Observation #: JJ1-OB-003	Date: 04/12/2022
While inspecting the Anderson Building, I met Ms. Honalee Elkan, Chemistry Lab Technician. Ms. Elkan showed me the waste accumulation areas, as well as the lab chemical storage areas.	
Photo(s) 1. IMG-20220412110054054725546.jpg 2. IMG-20220412110114114595926.jpg 3. IMG-20220412110122122649473.jpg 4. IMG-20220412110144144714134.jpg 5. IMG-2022041211040545648666.jpg 6. IMG-20220412110523523710468.jpg 7. IMG-2022041211070171785325.jpg 8. IMG-20220412110743743658762.jpg 9. IMG-20220412110810810752626.jpg	
Building: Egan Classroom Wing /Room 300U1	Contains CBI: No
Observation #: JJ1-OB-002	Date: 04/12/2022
While in Room 300U1, I inspected the area where waste fluorescent lamps and CFLs were being accumulated. The university does not manage waste lamps as universal waste.	
Photo(s) 1. IMG-202204121035243524909230.jpg 2. IMG-202204121035423542799447.jpg 3. IMG-202204121038333833797666.jpg	
Building: Egan Classroom Wing /Storage 118	Contains CBI: No
Observation #: JJ1-OB-001	Date: 04/12/2022
While inspecting Storage Room 118, I saw the area where the facility was accumulating waste fluorescent	

lamps. Mr. Garcia told me that the university does not manage the waste fluorescent lamps as universal waste. During the inspection, I saw 16 waste fluorescent lamps. At least some of the waste lamps were labeled in a green font, which is indicative of lamps that contain a low level of mercury that will pass TCLP testing.

Photo(s)

1. [IMG-202204121023472347935712.jpg](#)
2. [IMG-202204121023592359770349.jpg](#)
3. [IMG-202204121024332433752460.jpg](#)

Records Review

I obtained copies of disposal paperwork for the waste that was disposed at the HHW facility. These documents are included in the Document Log of this inspection report.

SECTION III – AREAS OF CONCERN

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

I observed no areas of concern at the time of the inspection.

SECTION IV – FOLLOW UP

N/A

Closing Conference

At the conclusion of the inspection, I conducted a closing conference that was attended by those listed in the Attendees table, in Section I of this report. I thanked Mr. Garcia for his time and cooperation during the inspection and reiterated that I observed no areas of concern at the time of the inspection. I then explained the follow-up process that would take place once I finished the report. I explained they would receive a copy of the report as would a case officer.

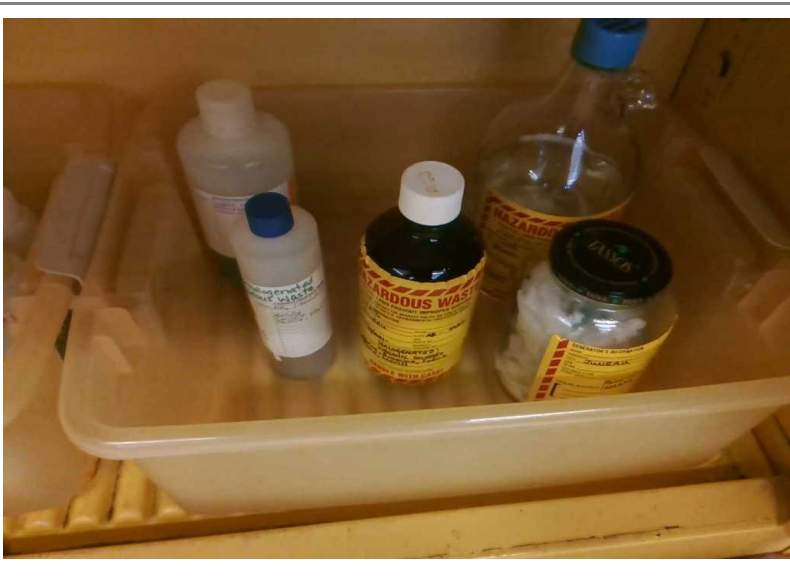
SECTION V – SAMPLING ACTIVITIES AND ANALYTICAL RESULTS - No sampling was conducted.

SECTION VI – LIST OF APPENDICES

Photo Log

<i>[Title]</i>	
IMG-20220412151808188856482.jpg	
04/12/2022 03:18 PM (AKT)	
Jon Jones	
Anderson Building #15/Hazardous Materials Storage Shed	
No CBI	
No PII	
View of the Hazmat shed.	
<i>[Title]</i>	
IMG-202204121519391939923883.jpg	
04/12/2022 03:19 PM (AKT)	
Jon Jones	
Anderson Building #15/Hazardous Materials Storage Shed	
No CBI	
No PII	
View of the waste in the Hazmat shed.	

[Title] IMG-202204121520172017973786.jpg 04/12/2022 03:20 PM (AKT) Jon Jones Anderson Building #15/Hazardous Materials Storage Shed No CBI No PII View of the waste in the Hazmat shed.	
[Title] IMG-202204121520282028901597.jpg 04/12/2022 03:20 PM (AKT) Jon Jones Anderson Building #15/Hazardous Materials Storage Shed No CBI No PII View of the waste in the Hazmat shed.	
[Title] IMG-202204121520342034807559.jpg 04/12/2022 03:20 PM (AKT) Jon Jones Anderson Building #15/Hazardous Materials Storage Shed No CBI No PII View of the waste in the Hazmat shed.	

[Title] IMG-20220412110054054725546.jpg 04/12/2022 11:00 AM (AKT) Jon Jones Anderson Building #15/Room 309 No CBI No PII view of the SAA beneath fume hood.	
[Title] IMG-20220412110114114595926.jpg 04/12/2022 11:01 AM (AKT) Jon Jones Anderson Building #15/Room 309 No CBI No PII view of the SAA beneath fume hood.	
[Title] IMG-20220412110122122649473.jpg 04/12/2022 11:01 AM (AKT) Jon Jones Anderson Building #15/Room 309 No CBI No PII view of the SAA beneath fume hood.	

[Title] IMG-20220412110144144714134.jpg 04/12/2022 11:01 AM (AKT) Jon Jones Anderson Building #15/Room 309 No CBI No PII view of the SAA beneath fume hood.	
[Title] IMG-2022041211040545648666.jpg 04/12/2022 11:04 AM (AKT) Jon Jones Anderson Building #15/Room 309 No CBI No PII View of waste in fume hood.	
[Title] IMG-20220412110523523710468.jpg 04/12/2022 11:05 AM (AKT) Jon Jones Anderson Building #15/Room 309 No CBI No PII View of waste in fume hood.	

[Title]

IMG-2022041211070171785325.jpg

04/12/2022 11:07 AM (AKT)

Jon Jones

Anderson Building #15/Room 309

No CBI

No PII

View of the chemical storage cabinets.

*[Title]*

IMG-20220412110743743658762.jpg

04/12/2022 11:07 AM (AKT)

Jon Jones

Anderson Building #15/Room 309

No CBI

No PII

View of the chemical storage cabinets.

*[Title]*

IMG-20220412110810810752626.jpg

04/12/2022 11:08 AM (AKT)

Jon Jones

Anderson Building #15/Room 309

No CBI

No PII

View of the chemical storage cabinets.



[Title] IMG-202204121035243524909230.jpg 04/12/2022 10:35 AM (AKT) Jon Jones Egan Classroom Wing /Room 300U1 No CBI No PII Accumulation of waste fluorescent lamps and CFLs.	
[Title] IMG-202204121035423542799447.jpg 04/12/2022 10:35 AM (AKT) Jon Jones Egan Classroom Wing /Room 300U1 No CBI No PII Accumulation of waste fluorescent lamps and CFLs.	
[Title] IMG-202204121038333833797666.jpg 04/12/2022 10:38 AM (AKT) Jon Jones Egan Classroom Wing /Room 300U1 No CBI No PII Accumulation of waste fluorescent lamps and CFLs.	

[Title] IMG-202204121023472347935712.jpg 04/12/2022 10:23 AM (AKT) Jon Jones Egan Classroom Wing /Storage 118 No CBI No PII During the inspection, I saw 16 waste fluorescent lamps.	
[Title] IMG-202204121023592359770349.jpg 04/12/2022 10:23 AM (AKT) Jon Jones Egan Classroom Wing /Storage 118 No CBI No PII During the inspection, I saw 16 waste fluorescent lamps.	
[Title] IMG-202204121024332433752460.jpg 04/12/2022 10:24 AM (AKT) Jon Jones Egan Classroom Wing /Storage 118 No CBI No PII During the inspection, I saw 16 waste fluorescent lamps.	

Document Log

Document Type	Document Name	Contains CBI	Contains PII	Uploaded By	Date Received
Facility Map	Facility Map.pdf	No	No	Jon Jones	04/21/2022

Inspection Date(s):

04/12/2022 - 04/12/2022

Other - Waste Inventory for HHW facility	Waste Inv. 3-7-2019.pdf	No	No	Jon Jones	04/21/2022
Other - Waste Inventory for HHW facility	Waste Inv. 5-2-2019.pdf	No	No	Jon Jones	04/21/2022
Other - Waste Inventory for HHW facility	Waste Inv. 5-30-2019.pdf	No	No	Jon Jones	04/21/2022
Other - Waste Inventory for HHW facility	Waste Inv. 11-14-2019.pdf	No	No	Jon Jones	04/21/2022
Other - Waste Inventory for HHW facility	Waste Inv. 4-16-2020.pdf	No	No	Jon Jones	04/21/2022
Other - Waste Inventory for HHW facility	Waste Inv. 10-22-2020.pdf	No	No	Jon Jones	04/21/2022
Other - Application for CESQG at HHW facility	App for CESQG.pdf	No	No	Jon Jones	04/21/2022