EPA United States Environmental Protection Agency

EPA REGION 10 Enforcement and Compliance Assurance Division

INSPECTION REPORT

Inspection Entry Date/Time	08/02/2024 12:20 PM (PT)	Announced: Yes
Inspection Exit Date/Time	08/02/2024 03:35 PM (PT)	Access: Granted
Weather	60°F, Sunny	
Media	Water	
Statute(s)/Program(s)	Clean Water Act, NPDES, Stormwater – Industrial	
Type of Inspection	Compliance Evaluation Inspection	
Permittee Name	Wayne Newton - Alaska Airlines Inc.	
Facility Name	Alaska Airlines Petersburg Station	
Facility Physical Address	1504 Haugen Drive	
City, State, Zip Code	Petersburg Census Subarea, AK 99833	
Borough	Petersburg	
Facility GPS Coordinates	56.80739, -132.93806	
Mailing Address	P.O. Box 68900 SEAZE	
City, State, Zip Code	Seattle, Washington 98168	
FRS ID	110070072428	
Permit Number	AKR06AC00	
SIC	4512 (Scheduled Air Transportation)	

Lead Inspector:

RAYMOND ANDREWS Digitally signed by RAYMOND ANDREWS
Date: 2024.08.28 12:58:38 -07'00'

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

Supervisor Review:

PETER CONTRERAS Digitally signed by PETER CONTRERAS
Date: 2024.08.28 15:22:59 -07'00'

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

SECTION I – Opening Conference

I arrived at the Alaska Airlines Petersburg Station (the "Site" or "Facility"), located at 1504 Haugen Drive, Petersburg, Alaska, at 12:20 PM (PT) on 08/02/2024 for an announced inspection. I presented my credentials to Tina Rodriguez and informed her I was there to determine compliance with the Clean Water Act (CWA), and the facility's National Pollutant Discharge Elimination System (NPDES) permit, permit # AKR06AC00. 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
Alaska Airlines	Tina Rodriquez	Environmental Affairs Program Manager	Yes	Yes
Alaska Airlines	Darcey Hedlund	Customer Service Lead	Yes	Yes

Facility Information

Responsible official?	Tina Rodriguez, christina.rodriguez.heald5@alaskaair.com
Type of Operation?	Airport
Industrial Sector	Sector S (Air Transportation)
Is property owned?	Alaska Airlines owns the office building, maintenance building and a warehouse. The land the airport is situated on belongs to the State of Alaska.
Site size?	The total site land area is approximately 240 acres. The approximate size of the operational area is 50 acres.
Years in operation?	The facility has been operating at this since for approximately 80 years.
Number of employees?	The facility has approximately six full time employees, but the facility increases staffing to 11 during the Summer.
Hours/Days of Operations?	The facility operates 7-days a week from 8:00am until 4:30pm.
Industrial activities exposed to stormwater?	During winter, the facility conducts de-icing operations. The facility uses a glycol-based product but does not meet or exceed the threshold that would trigger pollutant monitoring. The facility does not use products containing urea.
Personnel conducting inspections/sampling?	Skyler Cummings, the Station Agent, conducts all sampling and monitoring. 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 urea products, or 100,000 gallons glycol based deicing products.
What is your site monitoring frequency?	The facility is only required to monitor by conducting Quarterly Visual Inspections.
Sampling location?	The facility samples near the southeast corner of the building from sheet flow.
Receiving Water	Wrangell Narrows
Number/location of Outfalls?	The facility does not have specific outfalls. The stormwater sheet flows into a vegetated area. As stated above, samples are collected from the sheet flow.

Stormwater Treatment?	The facility does not conduct active treatment. All stormwater runoff leaves the paved area and enters a vegetated area where it infiltrates.
Type of materials and/or vehicles stored outdoors?	The facility does not store anything outside.

SECTION II – Observations

No observations were made that constitute an area of concern.

SECTION III – Records Review

Records may not be in sequential order.

Record: Other - Comprehensive Site Inspections		**AOC:** No
Ref #: RA1-RR-008	**Reviewed By:** Raymond Andrews	**Reviewed Date:** 08/26/2024
At the time of the inspection, I reviewed the facility's 2020 - 2023 Comprehensive Site Inspections. I did not note any areas of concern.		
Record: Other - Routine Monthly Inspection Reports		**AOC:** No
Ref #: RA1-RR-007	**Reviewed By:** Raymond Andrews	**Reviewed Date:** 08/02/2024
At the time of the inspection, I reviewed facility Routine Monthly Inspection Reports from January 2021 through July 2024. I did not note any areas of concern.		
Record: Other - ADEC Authorization to Discharge Letter		**AOC:** No
Ref #: RA1-RR-006	**Reviewed By:** Raymond Andrews	**Reviewed Date:** 08/23/2024
Post inspection, I reviewed the facility's Authorization to Discharge Letter from the Alaska Department of Environmental Observation (ADEC), dated July 20, 2020.		
Record: Other - Notice of Intent		**AOC:** No
Ref #: RA1-RR-005	**Reviewed By:** Raymond Andrews	**Reviewed Date:** 08/23/2024
Post inspection, I reviewed the facility's Notice of Intent (NOI), dated July 7, 2020.		
Record: Annual Reports		**AOC:** No
Ref #: RA1-RR-004	**Reviewed By:** Raymond Andrews	**Reviewed Date:** 08/02/2024
At the time of the inspection, I reviewed the facility's Annual Reports for 2021 through 2023. I did not note any areas of concern.		
Record: Other - SWPPP Map		**AOC:** Yes
Ref #: RA1-RR-003	**Reviewed By:** Raymond Andrews	**Reviewed Date:** 08/02/2024
At the time of inspection, I reviewed the facility's SWPPP map. I found the map was missing the location of stormwater monitoring points.		

Record: Other - Quarterly Visual Assessments (QVAs)		**AOC:** Yes
Ref #: RA1-RR-002	**Reviewed By:** Raymond Andrews	**Reviewed Date:** 08/02/2024
At the time of inspection, I reviewed the facility's QVAs for the previous 16 quarters. The QVAs were not signed in accordance with permit requirements. The facility is required to sample quarterly. In the 1st and 3rd Quarters of 2023, the facility did not collect a sample and annotated on the Quarterly Visual Monitoring Form that there was no qualifying rainfall. The 1st Quarter form was dated January 18, 2023. The 3rd Quarter Form was dated July 11, 2023. January and July are the first months of their respective quarters. The facility did not have QVA documentation for the 3rd and 4th Quarters of 2021. Several of the QVAs were missing one or both photographs required as documentation. The Quarterly visual monitoring forms for two quarters was missing the date. The Quarters missing documentation requirements are listed in the Areas of Concern.		
Record: SWPPP		**AOC:** Yes
Ref #: RA1-RR-001	**Reviewed By:** Raymond Andrews	**Reviewed Date:** 08/02/2024
At the time of the inspection, I reviewed the facility's Stormwater Pollution Prevention Plan (SWPPP), dated July 2020. There was no documentation in the SWPPP indicating it has been reviewed or updated annually.		

SECTION IV – Sampling Activities

No sampling was conducted.

SECTION V – Areas of Concern

Areas of Concern may not be in sequential order.
The presentation of Areas of Concern does not constitute a formal compliance determination or violation.

AOC Reference #: RA1-RR-002	**Records Review: Other - Quarterly Visual Assessments (QVAs)**
Permit Requirement Part 6.2.2 of the permit states, in part, "The QVAs were not sign in accordance with permit requirements...At a minimum, the permittees documentation of the visual assessment must include...Photographs of sample and sample location...Quarterly Visual Assessment Documentation must be signed and certified in accordance with Appendix A, Subsection 1.12 of the permit." Appendix A, Subsection 1.12 of the permit states, "1.12.5 In accordance with 18 AAC 83.385, an APDES permit application must be signed as follows: 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 not sign in accordance with permit requirements.	

AOC Reference #: RA1-RR-001	Records Review: SWPPP
Permit Requirement Part 5.6.5 of the permit states, in part, "The SWPPP must be updated at least annually."	
AOC: There is nothing in the SWPPP documenting that it has been reviewed or updated annually.	
AOC Reference #: RA1-RR-002	**Records Review: Other - Quarterly Visual Assessments (QVAs)**
Permit Requirement Part 6.2.1 of the permit states, in part, "Once each calendar quarter for the entire permit term, the permittee must collect a storm water sample from each outfall...and conduct a visual assessment of each of these samples...If no discharge occurs during the quarterly visual assessment period, the permittee must still report no discharge for this monitoring period..."	
AOC: The facility did not allow the entire quarterly visual assessment period to expire prior to claiming there was no discharge.	
AOC Reference #: RA1-RR-002	**Records Review: Other - Quarterly Visual Assessments (QVAs)**
Permit Requirement Part 6.2.1 of the permit states, in part, "Once each calendar quarter for the entire permit term, the permittee must collect a storm water sample from each outfall...and conduct a visual assessment of each of these samples...If no discharge occurs during the quarterly visual assessment period, the permittee must still report no discharge for this monitoring period..."	
AOC: The facility did not have QVA documentation for the 3rd and 4th Quarters of 2021.	
AOC Reference #: RA1-RR-002	**Records Review: Other - Quarterly Visual Assessments (QVAs)**
Permit Requirement Part 6.2.2 of the permit states, in part, "A permittee must document the results of their visual assessments and maintain this documentation onsite with the SWPPP...At a minimum, the permittees documentation of the visual assessment must include...Sample collection date and time, and visual assessment date and time for each sample...Photographs of sample and sample location..."	
AOC: Several of the QVAs were missing one or both of the documentation photos and two were missing the date. The Quarters missing photo documentation are 1Q 2023, 1Q & 4Q 2022, and 2Q & 4Q 2023. The Quarters missing the date of collection are 3Q & 4Q 2022.	
AOC Reference #: RA1-RR-003	**Records Review: Other - SWPPP Map**
Permit Requirement Part 5.2.3.3 of the Permit states, in part, "Provide a map showing...locations of all storm water monitoring points..."	
AOC: The SWPPP Map was missing the location of stormwater monitoring points.	

SECTION VI – Closing Conference

I held a closing conference with Facility personnel at 03:35 PM (PT) on 08/02/2024 for the inspection. During the closing conference, I discussed the observations and Areas of Concern identified during the inspection. Observations and Areas 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.

- **P1020023** – Certification of Urea Non-use
- **P1020024 –** SWPPP, De-icing, page 7
- **P1020025 –** Monthly Inspection Report, dated July 25, 2024, page 1
- **P1020026 –** Monthly Inspection Report, dated July 25, 2024, page 2
- **P1020027 –** Quarterly Visual Assessment, dated May 20, 2023
- **P1020028 –** Quarterly Visual Assessment, dated January 18, 2023