

INSPECTION REPORT

Inspection Entry Date/Time	07/08/2024 08:37 AM (AKT)	Announced: No
Inspection Exit Date/Time	07/08/2024 11:00 AM (AKT)	Access: Granted
Regulatory Program	Resource Conservation and Recovery Act (RCRA)	
Type of Inspection	Compliance Evaluation Inspection (CEI)	
Company Name	Sherwin-Williams	
Facility or Site Name	Sherwin-Williams #708176	
Facility/Site Identifier	AKD983069709	
Facility/Site Physical Address	245 Post Rd	
City, State, Zip Code	Anchorage, AK 99501-2802	
County/Borough	N/A	
Generator Status	Very Small Quantity Generator (VSQG)	
NAICS	444120	
Type of Operation	Sale of paints, epoxies and solvents	
Geographic Coordinates	61.219845, -149.858958	
Mailing Address/Secondary Address	245 Post Rd	
City, State, Zip Code	Anchorage, Alaska, 00501	
Permit Number (If Applicable)	N/A	

Lead Inspector:			
Xiangyu Chu	XIANGYU CHU	Digitally signed by XIANGYU CHU Date: 2024.09.17 13:59:51 -07'00'	
	EPA Region 10		
Supervisor Review:			
Matt Quarterman	MATTHEW QUARTERMAN	Digitally signed by MATTHEW QUARTERMAN Date: 2024.09.17 16:00:59 -07'00'	
	EPA Region 10		

SECTION I – INTRODUCTION

Site Entry and Purpose of the Inspection

Type of inspection: Compliance Evaluation Inspection (CEI)

EPA Inspectors Xiangyu Chu and Jon Jones, and Alaska Department of Environmental Conservation (ADEC) Inspectors, Emily VanNortwick, and Grace Tapulgo arrived at the Sherwin-Williams #708176 Facility (the “Site” or “Facility”), located at 245 Post Rd, Anchorage, AK 99501-2802, at 08:37 AM (AKT) on 07/08/2024 for an

unannounced inspection. EPA Lead Inspector presented credentials to and informed store manager, Jaylee Trujillo that this was an EPA Region 10 inspection to determine compliance with RCRA.

This report is based on information supplied by Sherwin-Williams #708176 Facility representatives, observations made by the EPA inspectors, and records and reports maintained by the facility and its Headquarters including, but not limited to: direct observations made by the EPA Inspectors , photographs taken by EPA inspectors, physical evidence collected by the EPA inspectors, measurements or samples taken by EPA inspectors, verbal or written statements made by information supplied by the facility representatives during or subsequent to the on-site Inspection, and materials, processes, data, photographs, or documents shown, demonstrated, or submitted to the EPA inspectors by the facility representatives during or subsequent to the on-site Inspection. In addition, information gathered prior to or subsequent to the Inspection from a review of USEPA, State, and public records may be included in this report.

Attendees

Title/Organization	Name	Phone	Email	Opening Conf.	Closing Conf.
Lead Inspector//EPA Region 10	Xiangyu Chu	(206) 553-2859	Chu.xiangyu@epa.gov	Yes	Yes
Inspector/EPA Region 10	Jon Jones	(907) 227-4316	Jones.jon@epa.gov	Yes	Yes
ADEC Inspector	Emily VanNortwick	(907) 854-5629	emily.vannortwick@alaska.gov	Yes	Yes
ADEC Inspector	Grace Tapulgo	(907) 269-7578	grace.tapulgo@alaska.gov	Yes	Yes
Sherwin Williams – Branch Manager	JayLee Trujillo	907-272-5550	Sw708176@sherwin.com	Yes	Yes

Opening Conference

EPA Region 10 inspectors, Xiangyu Chu, Jon Jones and two ADEC inspectors, Emily VanNortwick and Grace Tapulgo, arrived at Sherwin Williams at 9:07am and met with the store manager, Ms. Trujillo, for the opening conference in the manager's office.

Inspectors Chu presented her credentials and informed Ms. Trujillo that this was an EPA Region 10 inspection to determine compliance with RCRA. EPA inspectors then explained that the focus of this inspection was to identify types of wastes generated, points of waste generation, methods of waste management, and a review of relevant documents, which would include three years of weekly inspections, manifests, and any employee hazardous waste training provided by Sherwin Williams. Ms. Trujillo and the inspectors on site opted to perform the walk-through portion of the inspection first and review relevant documents afterwards. Ms. Trujillo informed us that this location had never been inspected in the past, and that they did not count their hazardous waste, rather they disposed of it when they had time to.

Sherwin Willams has one main hazardous waste accumulation area called the Hot Room. This area contains the Satellite Accumulation Area (SAA) and other pallets of expired material that are not yet identified as a waste. Ms. Trujillo explained that they do not count their hazardous waste each month, and only ship out waste as needed through Clean Earth. She does an inventory on expired items every few months but has no set schedule for it and has not inventoried the current expired items for a "long time". Once identified, expired products are then stored for several months longer as they await donation or discounted purchase.

Facility/Site Information

Safety Training Provided to Inspector(s)?	N/A
Operating Hours	7AM to 5PM on weekdays and 8AM to 12PM weekends
Length of Facility at Location	29 years
Number of employees	Seven at this location
Size of Facility	13,000 square feet
What type of generator facility notified?	SQG
What type of generator facility verified as?	VSQG
Weather Conditions	Cloudy, average temperature 58 degrees Fahrenheit

Process Description

Sherwin Williams is a coatings manufacturer and distributor. The location we inspected is a sales and distribution facility for primarily architectural coatings. This location stocks and sells paints, acrylic coatings, and varnishes. The waste streams produced primarily consist of spilled paint cleanup rags, wastewater, and universal wastes including aerosol cans and lamps. The location also has a collection of expired products that will be donated or sold at a discounted price.

At the time of the inspection, Ms. Trujillo told me that the facility doesn't count or keep records of the amount of waste generated on site. But she does not think they generate more than 220 pounds (100 kg) of hazardous waste per month. Based on our observations of waste generation and the amount of waste on site during the inspection, the facility appeared to be a very small quantity generator that was generating less than 220 pounds of hazardous waste during the month of the inspection.

During the inspection we examined the facility's processes, hazardous waste management practices, generation points, and accumulation areas. We looked for wastes that facility representative had not yet identified or designated as hazardous. We also observed the facility's universal waste management. Specifically, we inspected the areas of the facility listed below.

Building(s)

Building/Area/Sub-area	Process Description	Area of Concern
Carpet Room	Waste water collection site	No
Carpet area	Wastewater drum mixed with latex	No
Hot Room	Hazardous Waste Storage	Yes
Product shelf	Expired Acrolon coating	No
SAA	Paint cleanup rags, aerosol cans, propane containers, lamps	Yes
Outside	Expired Pallet	No

SECTION II – OBSERVATIONS

Building: Hot Room/SAA			
Observation #: EV3-OB-001	Date: 07/08/2024	Contains AOC: Yes	Contains CBI: No
Person Interviewed: JayLee Trujillo		Title: Manager	
At the time of inspection, we observed two SAA accumulation drums: one 35-gallon drum had a “Hazardous Waste” label and an aerosol can inside but was not marked or labeled with an indication of the hazards of the contents. The second 55-gallon drum contains cleanup materials such as spilled paint and epoxy rags. Ms. Trujillo told us that this is a SAA hazardous waste container and is managed as such. This drum was not labeled with the words “Hazardous Waste” and an indication of the hazards of the content. A small propane tank was found on the floor next to the SAA, Ms. Trujillo placed it into the hazardous waste drum after we photographed and documented it. We also observed a closed cardboard cylindrical drum that contained two universal waste lamps. This drum was not labeled or marked with the words “Universal Waste Lamps” or “Used Lamps” and was not marked with an accumulation start date. This drum was labeled with the words “Universal Waste.”			
Photo(s) IMG_2186.jpg			

Building: Hot Room/Product Shelf			
Observation #: EV3-OB-002	Date: 07/08/2024	Contains AOC: No	Contains CBI: No
Person Interviewed: JayLee Trujillo		Title: Manager	
At the time of the inspection, we observed one shelf next to the SAA that contained new and full Acrolon gallon containers that were expired. We asked if Ms. Trujillo had a written inventory of these products indicating awareness and a plan for the expired items, and she did not. We found five that were confirmed expired. Ms. Trujillo told us that these expired products were not determined to be a waste because they can still be sold or donated via the Sherwin Williams program called “Ready To Go.” Expired products are placed on a separate pallet when the manager has time, but there is no set review schedule to do this. Ms. Trujillo told me that the last inventory review was on October 22, 2023. We advised her to move forward in selling or donated this material to avoid it becoming a waste.			

Building: Carpet Room/Carpet area			
Observation #: EV3-OB-003	Date: 07/08/2024	Contains AOC: Yes	Contains CBI: No
Person Interviewed: JayLee Trujillo		Title: Manager	
At the time of the inspection, we observed two drums containing wastewater from pump maintenance and Latex cleaning. The drums were not labeled with “Hazardous Waste” or a hazardous waste indicator. Ms. Trujillo told me that the water is sent out as hazardous waste by Clean Harbors.			

SECTION III – RECORDS REVIEW

Record: Manifests		AOC: No
Ref #: EV3-RR-001	Reviewed By: Xiangyu Chu	Reviewed Date: 07/08/2024
At the time of the inspection, we examined the last three years of manifests, and found that all the manifests were signed and returned within 60 days.		
Record: Inspections		AOC: Yes
Ref #: EV3-RR-002	Reviewed By: Xiangyu Chu	Reviewed Date: 07/08/2024
No weekly hazardous waste inspections of the Satellite Accumulation Area have been conducted at this Sherwin Williams location. Ms. Trujillo stated that the waste drums, when full, remain on site for “under a month” before they are sent out as waste on an as-needed basis. Ms. Trujillo was then informed by EPA inspectors on how and when to conduct hazardous waste inspections since they had not been conducted before.		
Record: Training		AOC: No
Ref #: EV3-RR-003	Reviewed By: Xiangyu Chu	Reviewed Date: 07/08/2024
Sherwin Williams provides hazardous waste training, records indicate that all employees on site have received initial training within the last 5 years, with renewals coming up at the end of the year.		
Record: Preparedness and Prevention		AOC: No
Ref #: EV3-RR-004	Reviewed By: Xiangyu Chu	Reviewed Date: 07/08/2024
Ms. Trujillo has an evacuation plan in the Manager’s office, and it has been inspected by the fire department within the last year. Fire extinguishers get inspected yearly along with fire alarms.		
Record: Land Disposal Restrictions (LDR) Notices/Documents		AOC: No
Ref #: EV3-RR-005	Reviewed By: Xiangyu Chu	Reviewed Date: 07/08/2024

SECTION IV – AREA OF CONCERN

The presentation of Area(s) of Concern does not constitute a formal compliance determination or violation.

EV3-OB-001		
Two hazardous waste accumulation drums improperly labeled. One had only a “Hazardous Waste” label, but no hazardous waste indicator or accumulation start date. One had no labeling at all.	Citations:	Sections:

A third cylindrical cardboard box contained lamps. It was labeled with "Universal Waste" but did not include "Lamps" in the label, or have an accumulation start date.		
Building: Hot Room	Area: SAA	Sub-area:
EV3-OB-002		
A Butane tank was sitting on the floor adjacent to the SAA, and this was an AOC. Ms. Trujillo put it in a sealed hazardous waste drum after this was pointed out. (Correction: the small tank was a propane tank).	Citations:	Sections:
Building: Carpet Room	Area: Carpet area	Sub-area:
EV3-OB-003		
A drum was found that contained wastewater used for cleaning tools and pumps and may be mixed with latex. According to Ms. Trujillo, the water is sent out as hazardous waste when the drum fills up but is not counted appropriately.	Citations:	Sections:
Building: N/A	Area: Inspections	Sub-area: N/A

SECTION V – CLOSING CONFERENCE AND FOLLOW UP

Closing Conference

During the closing conference EPA inspectors reiterated that we would need to see training documents for the staff, and Ms. Trujillo made a note to send these records to Chu Xiangyu at a later date. Inspector Chu summarized the need for proper labeling of containers, as well as the use of checklists as tools for tracking and counting hazardous waste generation. Inspector Jones stated that he would send Ms. Trujillo some resources to help with this via email.

Inspector Chu then covered the AOCs from the inspection. Additionally, she advised Ms. Trujillo to pursue donating or selling the expired materials that were found to avoid them becoming a hazardous waste.

Inspector Chu also discussed the requirement for Ms. Trujillo to begin counting their hazardous waste so that they can notify correctly and have proper records for how much hazardous waste they are generating.

Finally, Inspector Chu informed Ms. Trujillo that she would send the report when it is complete.

Inspector Jones asked if there were any questions and Ms. Trujillo had none.

Follow Up

Training records were sent via email to EPA on 7/9/2024.

Communication Log

No additional information was received.

SECTION VI – SAMPLING ACTIVITIES AND ANALYTICAL RESULTS

No sampling was conducted.

SECTION VII – LIST OF APPENDICES

1. Photo Log

APPENDIX 1: PHOTO LOG



SAA			IMG_2186.jpg
07/08/2024 08:58 AM	No CBI	No PII	Photographer: Jon Jones
Hot Room/SAA			61.21983611, -149.85865833
A photo of the SAA.			



Hazardous Waste Drum			IMG-2024070808592059201125611.jpg
07/08/2024 08:59 AM (AKT)	No CBI	No PII	Photographer: Grace Tapulgo
Hot Room/SAA			[Geographic Coordinates]
This 55gal drum was not full, and it was missing a "hazardous waste" label and hazard indicator. The drum was closed.			



55 Gallon drum			IMG-2024070808595259521236339.jpg
07/08/2024 08:59 AM (AKT)	No CBI	No PII	Photographer: Emily VanNortwick
Hot Room/SAA			[Geographic Coordinates]
Closer photo of the label on the 55-gallon drum.			



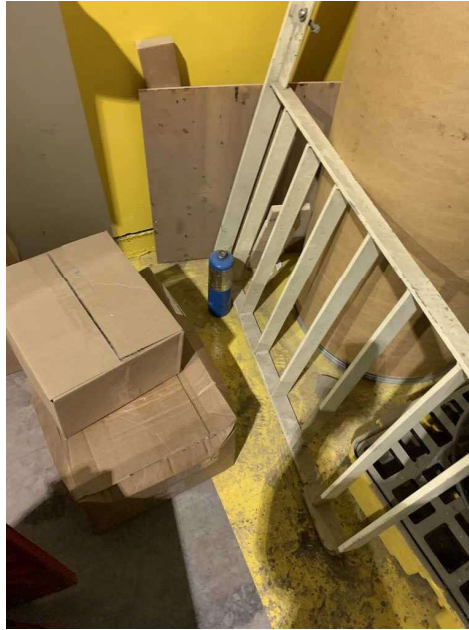
55 Gallon hazardous Waste drum			IMG-20240708090009091196538.jpg
07/08/2024 09:00 AM (AKT)	No CBI	No PII	Photographer: Emily VanNortwick
Hot Room/SAA			[Geographic Coordinates]
This drum was not full and did not have a hazard indicator or accumulation start date.			



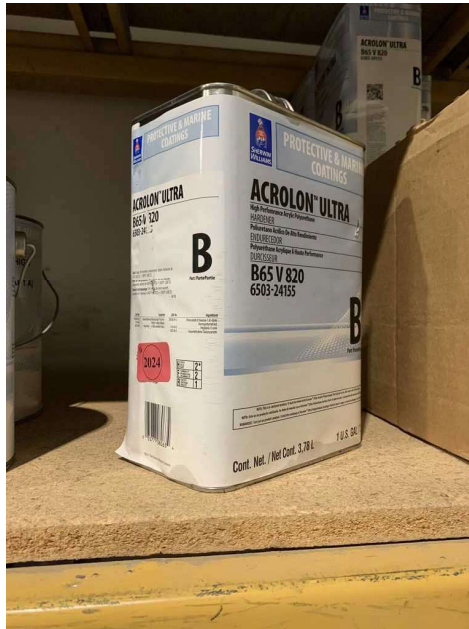
Cardboard universal waste box			IMG-202407080900550551082801.jpg
07/08/2024 09:00 AM (AKT)	No CBI	No PII	Photographer: Emily VanNortwick
Hot Room/SAA			[Geographic Coordinates]
This photo shows the interior to the cylindrical cardboard box containing lamps within the SAA.			



Cardboard universal waste box			IMG-20240708090104141174780.jpg
07/08/2024 09:01 AM (AKT)	No CBI	No PII	Photographer: Emily VanNortwick
Hot Room/SAA			[Geographic Coordinates]
This photo shows the "universal waste" label on the cardboard box, but it lacks a "lamp" label and accumulation start date.			



Propane tank on the floor			IMG_2189.jpg
07/08/2024 09:01 AM	No CBI	No PII	Photographer: Jon Jones
Hot Room/SAA			61.21987777, -149.85858055
Propane tank as it was found before being placed in the drum.			



Expired Acrolon			IMG_2191.jpg
07/08/2024 09:05 AM	No CBI	No PII	Photographer: Jon Jones
Hot Room/SAA			61.21982222, -149.85887222
This is a photo of one of the expired Acrolon containers. It is unopened and unused.			



Expired Acrolon Date			IMG-20240708090704741348324.jpg
07/08/2024 09:07 AM (AKT)	No CBI	No PII	Photographer: Emily VanNortwick
Hot Room/SAA			[Geographic Coordinates]
The expiration date on a container of Acrolon			



Expired Paint			IMG_2197.jpg
07/08/2024 09:25 AM	No CBI	No PII	Photographer: Jon Jones
Hot Room/SAA			61.21959722, -149.85885555
Expired cans of paint on the shelf.			