

REGION 10 Enforcement Division

INSPECTION REPORT

Inspection Date(s):	04/27/2021 - 04/27/2021	Announced: No	
Time:	Entry: 08:43 AM (AKT)	Exit: 02:55 PM (AKT)	
Program:	RCRA		
Regulatory Program(s):	Title 40 - ENVIRONMENTAL PROTECTION AGENCY		
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 SOLDOTNA		
Facility/Site Physical Address:	46445 STERLING HIGHWAY		
(city, state, zip code)	SOLDOTNA, AK 99669		
Type of Operation:	The Maintenance and Operations (M&O) function of Alaska DOT & PF Soldotna maintains highways and makes pavement repairs and the State Equipment Fleet (SEF) component performs vehicle maintenance		
Size of Facility:	10 to 15 acres		
Length of Facility at Location:	Since 1998, 22 years		
Geographic Coordinates:	60.45306, -151.10279		
Mailing address: (Secondary Address)	Ms. Renee Goentzel, Environmental Impact Analyst III Alaska Department of Transportation and Public Facilities Maintenance & Operations Section, Central Region P.O. Box 196900 renee.goentzel@alaska.gov CC: Brian Gabriel, SR , Soldotna Maintenance Foreman, Peninsula District brian.gabriel@alaska.gov Robert Smith, Airport Manager/Safety Coordinator robert.smith2@alaska.gov		
(city, state, zip code)	Anchorage, AK 99519-6900		
County:			
Facility/Site Identifier:	AKR000203653		
Media Number:	Unpermitted Facility		
NAICS:	23731 – Highway, Street, and Bridge Construction		
Lead Inspector:			
Jon Jones	Jones, Jon	Digitally signed by Jones, Jon Date: 2021.07.12 12:19:56 -08'00'	
	REGION 10	Jones.Jon@epa.gov	(907) 271-6329
Additional Persons Participating in Inspection:			
Supervisor Review:			

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Jen Sullivan	Jennifer A Sullivan		Digitally signed by Jennifer A Sullivan Date: 2021.07.12 14:29:14 -07'00'	
	REGION 10	Sullivan.Jennifer.A@epa.gov	(206) 553-6978	

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 2021.

Attendees

Title	Name	Phone	Email	Present in Opening Conf.	Present in Closing Conf.
Lead Inspector	Jon Jones	9072716329	Jones.Jon@epa.gov	Yes	Yes
Station Foreman	Brian Gabriel, SR	(907) 262-2199	brian.gabriel@alaska.gov	Yes	Yes
Equipment Operator	Jeffrey Mahan	(907) 262-2199	jeffrey.mahan@alaska.gov	Yes	Yes
Operator	Salty Bock	(907) 262-2199	salty.bock@alaska.gov	Yes	Yes
Airport Manager/Safety Coordinator	Rob Smith	(907) 953-6733	robert.smith2@alaska.gov	Yes	Yes
Mechanic Foreman II	Frank Siemion III	(907) 262-1190	frank.siemion@alaska.gov	Yes	Yes

Opening Conference

EPA Lead Inspector Jon Jones arrived at the Alaska DOT & PF Soldotna facility at 08:43 AM (AKT) on 04/27/2021 for an inspection. I presented my credentials to Brian Gabriel and informed him that this was an EPA RCRA inspection. The table above presents all the inspection opening and closing conference 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. Mahan, Smith, and Bock. At the point when I inspected the SEF side of the Soldotna shop, I was also accompanied by Mr. Siemion. At the point when I inspected the Facilities Connex, we were joined by Mr. Larry Tews, Building Maintenance Lead. While inspecting the Electrician's Connex we were also accompanied by Mr. Gabriel, Station Foreman.

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Facility/Site Description

Alaska Department of Transportation& Public Facilities (Alaska DOT & PF) Soldotna has been at its present location (46445 Sterling Highway) since 1998. One side of the facility houses ADOT&PF Maintenance & Operations (M&O), which maintains highways and makes pavement repairs, and the other side of the facility houses the State Equipment Fleet (SEF), which maintains approximately 400 state owned vehicles that belong to various state agencies, including State Troopers and Fish and Game.

Facility Info

Safety Training Provided to Inspector(s)?	No
What type of generator facility notified?	SQG
What type of generator facility verified as?	Verified SQG by Frank Siemion, Mechanic Foreman II; however, based on additional information I received while talking with facility personnel as well as the amount of waste I observed during the inspection, the facility appeared to be a Very Small Quantity Generator (VSQG) of hazardous waste during the month of April 2021.
Weather Conditions	Cool and sunny
Number of employees	SEF side 7, M&O side 13, which includes admin personnel
Operating Hours	6 a.m. to 4:30 p.m., Monday through Friday

Process Description

During the opening conference Messrs. Siemion, Smith, and Mahan told me about the following wastes that are generated and how the wastes were being managed.

State Equipment Fleet

Waste aerosols

Used oil – burned in an on-site used oil burning space heater during the winter months.

Batteries – managed as universal waste

Lead-acid batteries, one for one turn-in with Interstate battery

Antifreeze - recycled through US Ecology (formerly NRC Alaska, LLC)

Fluorescent lamps - managed by State of Alaska Facilities and handled by US Ecology as universal waste.

Zep parts washer - very seldom used, no recollection as to when any waste was ever generated.

Sand blast grit – used to removed rust from metal surfaces prior to welding, no recollection as to when any waste was ever generated.

Mud trap waste – managed as a non-hazardous waste through US Ecology (formerly NRC)

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Maintenance & Operations

Paint related material – returned to the paint manufacturer to be recycled into the paint manufacturing process.

Batteries, alkaline, lithium, NiCad - managed as universal waste

Waste aerosols

Used oil – burned in an on-site used oil burning space heater during the winter months.

Oily rags - burned in a smart ash burner

Building(s)

Building/Area	Process Description	Area of Concern
Cold storage	Signs, broom bristle storage	Yes
Facilities Connex		Yes
Electricians Connex		Yes
Main Building	Soldotna main office Soldotna shop Soldotna warm storage All areas listed above are in the Main building.	Yes
Soldotna Shop	SEF -State Equipment Fleet Maintain all state vehicles within their operating area. Peninsula District.	Yes
Warm storage	M&O Maintenance and operations side. Brine is made here for roads in the winter months.	Yes
Sand shed		No
South of the sand shed		No
Tire shed		No

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

Building: Cold storage/Facilities Connex	Contains CBI: No
Observation #: JJ1-OB-005	Date/Time: 04/27/2021
While inspecting the contents of the Facilities Connex, I saw a box containing eight-foot fluorescent lamps. Upon closer inspection I saw that the fluorescent lamps had darkened, burnt ends, indicative of waste lamps.	

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Larry Tews, Building Maintenance Lead, told me they were waste fluorescent lamps. He also explained that just like SEF, M&O manages waste lamps as universal waste. At the time of the inspection, the container of waste lamps was not closed and not labeled as universal waste lamps, waste lamps, or used lamps. Mr. Tews said he thinks the lamps have been in the Connex box since August 2020. The container was not marked with the date the lamps first became a waste or an accumulation start date (ASD) and Mr. Tews did not provide any information about any other methods used by the facility to track the initial date(s) when the lamps became waste. There were 14 lamps in the container.

The facility representative closed the waste fluorescent lamp container, labeled it with the words "Used Lamps", marked the date 8/2020 on the container, and moved it to the Electrician's Connex during the inspection.

Photo(s)

1. [Observation Image-20210427110618618340102.jpg](#)
2. [Observation Image-20210427110639639316751.jpg](#)
3. [Observation Image-20210427110649649372653.jpg](#)
4. [Observation Image-20210427124805485802060.jpg](#)

Building: Cold storage/Facilities Connex**Contains CBI:** No**Observation #:** JJ1-OB-006**Date/Time:** 04/27/2021

While inspecting the contents of the Facilities Connex, I saw an open five-gallon container inside an open yellow plastic bag. I saw that there was a flammable marking on the container and there were numerous dried white paint drippings on the exterior of the container. I looked into the container and observed that it held a small volume of white paint that appeared to be in the process of drying out, since only some of it appeared to be wet and the rest of it appeared to be dry and cracking. Initially, I was unable to determine what type of paint was in the container since the dried paint drippings covered the label. Mr. Tews confirmed that the container held waste paint. The container was not RCRA empty. I asked facility personnel if they could determine what type of paint it was and provide me with a copy of a Safety Data Sheet (SDS) for the waste paint. Facility personnel provided me with a copy of the SDS during the inspection (Corothane) and the SDS indicated that the waste paint was hazardous waste due to ignitability (D001). The SDS indicated that the paint had a flashpoint of 93.2°F. Facility personnel said they didn't think it was anything they had purchased and believed the paint may have been left at the facility entrance after-hours by a member of the community. They indicated that happened from time to time.

Photo(s)

1. [Observation Image-202104271114151415824872.jpg](#)
2. [Observation Image-202104271114371437720148.jpg](#)
3. [Observation Image-202104271115201520643792.jpg](#)
4. [Observation Image-202104271117301730625687.jpg](#)
5. [Observation Image-202104271119481948246649.jpg](#)

Building: Cold storage/Facilities Connex**Contains CBI:** No**Observation #:** JJ1-OB-007**Date/Time:** 04/27/2021

While still inside the Connex, I also saw an open five-gallon container that held approximately 15 or more high-pressure sodium bulbs. They appeared to be waste lamps since one bulb was broken and other bulbs appeared to be darkened. Mr. Tews confirmed they were waste lamps. The container was not closed and neither the individual lamps or the container were labeled to identify them as universal waste lamps, waste lamps, or used

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lamps. Mr. Tews said he had no idea how long the bulbs had been in the Connex, but said they were not there in August 2020 when the other waste lamps were placed in the Connex (see Observation #JJ1-OB-005). The container was not marked with the date the lamps first became a waste or an accumulation start date (ASD), and Mr. Tews did not provide any information about any other methods used by the facility to track the initial date(s) when the lamps became waste

During the inspection, a facility representative placed the lamps in containers, closed the containers, labeled them with the words "Used Lamps", and marked the date 8/15/2020 on each container, then moved the containers to the Electrician's Connex.

Photo(s)

1. [Observation Image-202104271135573557337133.jpg](#)
2. [Observation Image-20210427113606366311848.jpg](#)
3. [Observation Image-202104271250475047688547.jpg](#)

Building: Electrician's Connex	Contains CBI: No
Observation #: JJ1-OB-010	Date/Time: 04/27/2021
While inspecting the Electrician's Connex, I saw a trash receptacle that was being used to accumulate waste high-pressure sodium bulbs. The trash receptacle was labeled and dated but was not closed. There were approximately 40 bulbs in the trash receptacle. During the inspection, Mr. Gabriel repackaged the lamps in a box that he closed and labeled with the words "Used Lamps" and the date 2/27/2021.	
Photo(s) 1. Observation Image-202104271233263326688003.jpg 2. Observation Image-202104271233453345737029.jpg 3. Observation Image-20210427124404444379007.jpg	

Building: Main Building/Soldotna Shop	Contains CBI: No
Observation #: JJ1-OB-001	Date/Time: 04/27/2021
While inspecting the SEF side of the Soldotna shop, I saw a waste aerosol can that was in the bottom of a trash receptacle. The aerosol can had been punctured using a punch, according to Mr. Siemion. Mr. Siemion said that they puncture waste aerosol cans and the punctured aerosol cans are then thrown into the trash. Mr. Siemion said that waste aerosol cans are punctured in various ways, such as on a sharp edge of a worktable, or using a tool to poke a hole in an aerosol can, for the purposes of facilitating draining. Mr. Siemion did not indicate that the removed contents from the punctured aerosol cans are collected or managed in any way once they have been released from the aerosol cans.	
Photo(s) 1. Observation Image-202104270949124912318289.jpg 2. Observation Image-202104270949564956460303.jpg 3. Observation Image-202104270950535053450559.jpg 4. Observation Image-202104270954525452395678.jpg 5. Observation Image-202104270955405540426715.jpg	

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Building: Main Building/Soldotna Shop	Contains CBI: No
Observation #: JJ1-OB-002	Date/Time: 04/27/2021
While still in the Soldotna shop, I saw two more waste aerosol cans in another trash receptacle that had been punctured.	
Photo(s) 1. Observation Image-2021042710050959369358.jpg 2. Observation Image-2021042710060666634566.jpg 3. Observation Image-20210427100654654475887.jpg	

Building: Main Building/Soldotna Shop	Contains CBI: No
Observation #: JJ1-OB-003	Date/Time: 04/27/2021
While inspecting the Soldotna Shop, I saw a small sand blast cabinet. I asked about the sand blast media, such as how much was generated and how it was being managed. Soldotna Shop personnel stated that they didn't remember when the last time was that it was disposed but said that it was re-used repeatedly to remove rust from metal prior to welding. I was told that it was not being used to remove paint from painted surfaces.	
Photo(s) 1. Observation Image-202104271011271127214494.jpg 2. Observation Image-202104271011501150333117.jpg	

Building: Main Building/Warm storage	Contains CBI: No
Observation #: JJ1-OB-004	Date/Time: 04/27/2021
While in the warm storage area, I inspected the contents of a yellow flammables locker and I saw several aerosol cans. I began picking up and shaking various aerosol cans to determine if any were empty and inherently waste-like. I observed two aerosol cans of survey marking paint that felt empty. Mr. Robert Smith, Airport Manager/Safety Coordinator, looked at the aerosol cans and verified that they were waste aerosol cans. Mr. Smith put the waste aerosol cans into a 55-gallon container and labeled the container with the words "Hazardous Waste" during the inspection. At this point in the inspection, Messrs. Mahan and Smith asked questions about waste aerosol can management and I explained that their management options depended on their generator category. I provided a brief summary of the container management requirements for each generator category and they asked about can puncturing. I told them that if they were going to puncture their waste aerosol cans, they should stop their current puncturing practices and get a drum-top can popper and ensure that the emptied aerosol cans are recycled as scrap metal and manage the contents removed from the punctured cans appropriately. I covered their options of managing the aerosols as universal waste as well. I also explained to them that if they determined that their generator status was that of a VSQG, they could just accumulate their waste aerosol cans and dispose of them at the local household hazardous waste (HHW) facility. I told them that VSQG's can usually dispose of their hazardous waste at a HHW facility for a small fee.	

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Photo(s)

1. [Observation Image-20210427103507357675692.jpg](#)
2. [Observation Image-202104271451495149229289.jpg](#)
3. [Observation Image-20210427145506556273579.jpg](#)
4. [Observation Image-202104271455155515237957.jpg](#)

Building: Sand shed**Contains CBI:** No**Observation #:** JJ1-OB-008**Date/Time:** 04/27/2021

While inspecting the Sand Shed, I saw a 250-gallon stainless steel tote with what looked like dried white traffic paint in the bottom. According to Jeffrey Mahan, M&O Equipment Operator, the tote is used to stage the paint mixer. According to Mr. Mahan, the paint mixer is placed inside of the totes of traffic paint to mix the paint. The mixer is then removed and placed inside an empty tote. Mr. Mahan explained that the dried paint that I observed in the bottom of the tote had dripped off the mixer and accumulated in the bottom of the tote between 2016 and 2018. At the time of the inspection, there was approx. 3 to 3.5 inches of the dried white and yellow traffic paint in the bottom of the tote. Safety Data Sheets for Alaska Low VOC White Solvent Paint and Alaska Low VOC LF Yellow Solvent Paint were provided by the facility. According to the information contained in the SDS's, the Alaska Low VOC White Solvent Paint is hazardous for ignitability (D001) with a flashpoint of -4°F. The Alaska Low VOC LF Yellow Solvent Paint is hazardous for ignitability (D001) with a flashpoint of -4°F and toxicity for benzene (D018). The Alaska Low VOC LF Yellow Solvent Paint contains benzene at less than 0.1% by weight or roughly less than 1,000 parts per million (ppm). The maximum regulatory concentration for benzene is 0.5 ppm.

Photo(s)

1. [Observation Image-202104271156445644309404.jpg](#)
2. [Observation Image-202104271156565656367626.jpg](#)
3. [Observation Image-20210427115709579265183.jpg](#)

Building: Sand shed/South of the sand shed**Contains CBI:** No**Observation #:** JJ1-OB-009**Date/Time:** 04/27/2021

As I left the Sand Shed, I saw additional stainless-steel totes containing both white and yellow traffic paint. According to Mr. Mahan, the traffic painting equipment is cleaned out with toluene. The waste paint and toluene mixture is placed back into a stainless-steel tote and sent back to the manufacturer where it is recycled back into the paint manufacturing process.

Photo(s)

1. [Observation Image-20210427120248248482719.jpg](#)
2. [Observation Image-20210427120315315334367.jpg](#)
3. [Observation Image-20210427120345345298183.jpg](#)

Records Review**Record:** List of Waste Streams or Waste Stream tracking documents**AOC:** No**Ref #:** JJ1-RR-001**Reviewed By:** Jon Jones**Reviewed Date:** 07/02/2021

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I obtained copies of hazardous waste logs and solvent usage logs while at the facility and performed a cursory review of the documentation to gain a better understanding of the facility's generator status.

Document(s)

1. HW Inv log.pdf
2. Solvent usage log.pdf

Record: Shipping Documents/Tolling agreements**AOC:** No**Ref #:** JJ1-RR-002**Reviewed By:** Jon Jones**Reviewed Date:** 07/02/2021

I obtained copies of hazardous waste manifests while at the facility and performed a cursory review of the documentation to gain a better understanding of the facility's generator status.

Document(s)

1. 000297312FLE.pdf
2. Manifest.pdf

Record: Others**AOC:** No**Ref #:** JJ1-RR-003**Reviewed By:** Jon Jones**Reviewed Date:** 07/02/2021

At the time of the inspection, I obtained copies of documents related to the facility's EPA identification number for the 46445 Sterling Highway location. The documentation provided by the facility includes EPA Forms 8700-12 (RCRA Subtitle C Site Identification Forms) as well as an email chain between Mary Winsor, EPA, Brian Gabriel, Soldotna, and Renee Goentzel, Environmental Impact Analyst III. After performing a cursory review of the documentation and speaking with Mr. Gabriel during the inspection, I came to the conclusion that the facility's original EPA I.D.# AKD980974182 belonged to a facility that was located a couple of miles away from the 46445 Sterling Highway location. At the time of the September 22, 2009 RCRA compliance inspection, the facility had moved from its previous location, and had updated their site notification to reflect the new address, inadvertently moving the old site's EPA I.D.# to the new location at 46445 Sterling Highway. Sometime after the 2009 inspection, the site at 46445 Sterling Highway location was issued EPA I.D.# AKR000203653.

The facility representatives provided two manifests for shipments of hazardous waste that occurred after the September 22, 2009 RCRA compliance inspection, both of which identify the generator's ID number and the generator's site address as the location of the former ADOT&PF Soldotna facility. The facility representatives did not provide any manifests for review that identified the ID number of the current Soldotna facility or the address of 46445 Sterling Highway for the current facility in Soldotna.

Document(s)

1. 8700-12 (2).pdf
2. 8700-12.pdf
3. Email chain regarding facility notification.pdf
4. EPA ID paperwork.pdf
5. 000297312FLE.pdf
6. Manifest.pdf

SECTION III – AREAS OF CONCERN

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

Building: Cold storage**Area:** Facilities Connex**Sub-area:****JJ1-OB-005**

While inspecting the contents of the Facilities Connex, I saw a box containing eight-foot fluorescent lamps. Upon closer inspection I saw that the fluorescent lamps had darkened, burnt ends, indicative of waste lamps.

Larry Tews, Building Maintenance Lead, told me they were waste fluorescent lamps and M&O manages them as universal waste. At the time of the inspection, the container of waste lamps was not closed, not labeled as universal waste lamps, waste lamps, or used lamps. Mr. Tews said he thought the lamps had been in the Connex box since August 2020. The container was not marked with the date the lamps first became a waste or an ASD, and the facility did not provide any evidence of other systems in use to track the date(s) the lamps became waste. There were 14 lamps in the container.

Citation:**Section:****JJ1-OB-006**

While inspecting the contents of the Facilities Connex, I saw an open five-gallon container, inside an open yellow plastic bag. I saw that there was a flammable marking on the container. The facility representative provided an SDS (Corothane) for the paint, which indicated the waste paint was hazardous waste.

Citation:**Section:****JJ1-OB-007**

While inspecting the contents of the Facilities Connex, I also saw an open five-gallon

Citation:**Section:**

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container that held approximately 15 or more waste high-pressure sodium bulbs. The container was not closed, not labeled as universal waste Lamps, waste lamps, or used lamps. The container was not marked with the date the lamps first became a waste or an ASD. Mr. Tews had no idea how long the bulbs had been in the Connex, but said they were not there last August 2020.

Building: Electrician's Connex**Area:****Sub-area:****JJ1-OB-010**

While inspecting the Electrician's Connex, I saw a trash receptacle that was being used to accumulate waste high-pressure sodium bulbs. The trash receptacle was not closed but was labeled with the words, "Used HPS Lamps" and dated 2/27/2021.

Citation:**Section:****Building:** Main Building**Area:** Soldotna Shop**Sub-area:****JJ1-OB-001**

While inspecting the Soldotna shop, I saw a waste aerosol can that was in the bottom of a trash receptacle. I saw that the aerosol can had been punctured. According to Mr. Siemion, the aerosol can had been punctured using a punch.

Mr. Siemion said that they puncture waste aerosol cans using a punch and the punctured aerosol cans are then thrown into the trash. Mr. Siemion did not indicate that the facility manages the removed aerosol contents after they have been released from the punctured aerosol cans.

Mr. Siemion said that the waste

Citation:**Section:**

Inspection Date(s):

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aerosol cans are punctured in various ways, such as on a sharp edge of a worktable, or a tool used to poke a hole in an oil filter, for the purposes of facilitating draining.		
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JJ1-OB-002

While still in the Soldotna shop, I saw two more waste aerosol cans in another trash receptacle that had been punctured.	Citation:	Section:
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Building: Main Building**Area:** Warm storage**Sub-area:****JJ1-OB-004**

I observed two aerosol cans of survey marking paint that felt empty and appeared to be waste-like. Mr. Smith looked at the aerosol cans and verified that they were waste aerosol cans. The waste aerosol cans were stored in a flammables locker when I first observed them.	Citation:	Section:
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SECTION IV – FOLLOW UP - I observed no follow up at the time of the inspection.**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 and paperwork review while at the facility. I answered any questions they had and 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]	
Observation_Image-20210427110618618340102.jpg	
04/27/2021 11:06 AM (AKT)	
Jon Jones	
Cold storage/Facilities Connex	
No CBI	
No PII	
View of a box containing 14 waste fluorescent lamps. At the time of the inspection, the container of waste lamps was not closed, not labeled as either UW Lamps, waste lamps, or used lamps. The container was not marked with the date the lamps first became a waste or an ASD.	
[Title]	
Observation_Image-20210427110639639316751.jpg	
04/27/2021 11:06 AM (AKT)	
Jon Jones	
Cold storage/Facilities Connex	
No CBI	
No PII	
Another view of the box containing 14 waste fluorescent lamps. At the time of the inspection, the container of waste lamps was not closed, not labeled as either UW Lamps, waste lamps, or used lamps. The container was not marked with the date the lamps first became a waste or an ASD. This view shows the darkened, burnt ends on the lamps.	

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[Title]	
Observation_Image-20210427110649649372653.jpg	
04/27/2021 11:06 AM (AKT)	
Jon Jones	
Cold storage/Facilities Connex	
No CBI	
No PII	
This is another View of the box containing 14 waste fluorescent lamps. At the time of the inspection, the container of waste lamps was not closed, not labeled as either UW Lamps, waste lamps, or used lamps. The container was not marked with the date the lamps first became a waste or an ASD.	
[Title]	
Observation_Image-202104271114151415824872.jpg	
04/27/2021 11:14 AM (AKT)	
Jon Jones	
Cold storage/Facilities Connex	
No CBI	
No PII	
View of an open five-gallon container, inside of an open yellow plastic bag that appeared to have been left open to evaporate and dry out.	

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[Title]	
Observation_Image-202104271114371437720148.jpg	
04/27/2021 11:14 AM (AKT)	
Jon Jones	
Cold storage/Facilities Connex	
No CBI	
No PII	
View of the contents inside the open five-gallon container, inside of an open yellow plastic bag that appeared to have been left open to evaporate and dry out.	
[Title]	
Observation_Image-202104271115201520643792.jpg	
04/27/2021 11:15 AM (AKT)	
Jon Jones	
Cold storage/Facilities Connex	
No CBI	
No PII	
View of the labeling on the five-gallon container that was open and inside of an open yellow plastic bag that appeared to have been left open to evaporate and dry out.	

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[Title]
Observation_Image- 202104271117301730625687.jpg
04/27/2021 11:17 AM (AKT)
Jon Jones
Cold storage/Facilities Connex
No CBI
No PII
Another view of the labeling on the five-gallon container.



[Title]
Observation_Image- 202104271119481948246649.jpg
04/27/2021 11:19 AM (AKT)
Jon Jones
Cold storage/Facilities Connex
No CBI
No PII
Another view of the labeling on the five-gallon container.



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*[Title]*Observation_Image-
202104271135573557337133.jpg

04/27/2021 11:35 AM (AKT)

Jon Jones

Cold storage/Facilities Connex

No CBI

No PII

View of five-gallon container that held approximately 15 waste high-pressure sodium bulbs. The container was not closed and not labeled and there was no ASD.

*[Title]*Observation_Image-
20210427113606366311848.jpg

04/27/2021 11:36 AM (AKT)

Jon Jones

Cold storage/Facilities Connex

No CBI

No PII

Close-up view of five-gallon container that held approximately 15 waste high-pressure sodium bulbs. The container was not closed and not labeled and there was no ASD. This view shows that one of the bulbs is broken.



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[Title]

Observation_Image-
20210427124805485802060.jpg

04/27/2021 12:48 PM (AKT)

Jon Jones

Electrician's Connex

No CBI

No PII

View of the eight-foot waste fluorescent lamps that were observed in the Cold Shed/Facilities Connex after the container was closed, labeled "Used Lamps" and dated 8/2020 during the inspection.



[Title]

Observation_Image-
202104271250475047688547.jpg

04/27/2021 12:50 PM (AKT)

Jon Jones

Electrician's Connex

No CBI

No PII

View of the waste high-pressure sodium bulbs that were observed in the Cold Shed/Facilities Connex after the waste bulbs were re-packaged in a closed container, labeled "Used Lamps" and dated 8/15/2020 during the inspection.



Inspection Date(s):

04/27/2021 - 04/27/2021

[Title]	
Observation_Image-202104271233263326688003.jpg	
04/27/2021 12:33 PM (AKT)	
Jon Jones	
Electrician's Connex	
No CBI	
No PII	
View of a trash receptacle that was being used to accumulate waste high-pressure sodium bulbs. The container seen in the photo is not closed but is labeled and dated.	

[Title]	
Observation_Image-202104271233453345737029.jpg	
04/27/2021 12:33 PM (AKT)	
Jon Jones	
Electricians Connex	
No CBI	
No PII	
A view of the waste high-pressure sodium bulbs inside the trash receptacle.	

Inspection Date(s):

04/27/2021 - 04/27/2021

[Title] Observation_Image-20210427124404444379007.jpg 04/27/2021 12:44 PM (AKT) Jon Jones Electricians Connex No CBI No PII View of the closed, labeled, and dated container that the waste bulbs in the trash receptacle were re-packaged in during the inspection.	
[Title] Observation_Image-202104270949124912318289.jpg 04/27/2021 09:49 AM (AKT) Jon Jones Main Building/Soldotna Shop No CBI No PII View of a waste aerosol can that was in the bottom of a trash receptacle. The aerosol can had been punctured using a punch, according to Mr. Siemion.	

Inspection Date(s):

04/27/2021 - 04/27/2021

[Title]	
Observation_Image-202104270949564956460303.jpg	
04/27/2021 09:49 AM (AKT)	
Jon Jones	
Main Building/Soldotna Shop	
No CBI	
No PII	
A view of the same waste aerosol can that was in the bottom of the trash receptacle. The aerosol can had been punctured using a punch, according to Mr. Siemion.	
[Title]	
Observation_Image-202104270950535053450559.jpg	
04/27/2021 09:50 AM (AKT)	
Jon Jones	
Main Building/Soldotna Shop	
No CBI	
No PII	
View of the corner of the work bench that Mr. Siemion said is sometimes used to puncture waste aerosol cans.	

Inspection Date(s):

04/27/2021 - 04/27/2021

[Title] Observation_Image-202104270954525452395678.jpg 04/27/2021 09:54 AM (AKT) Jon Jones Main Building/Soldotna Shop No CBI No PII View of the punch that Mr. Siemion said is sometimes used to puncture waste aerosol cans.	
[Title] Observation_Image-202104270955405540426715.jpg 04/27/2021 09:55 AM (AKT) Jon Jones Main Building/Soldotna Shop No CBI No PII Another view of the corner of the work bench that Mr. Siemion said is sometimes used to puncture waste aerosol cans.	

Inspection Date(s):

04/27/2021 - 04/27/2021

[Title] Observation_Image-2021042710050959369358.jpg 04/27/2021 10:05 AM (AKT) Jon Jones Main Building/Soldotna Shop No CBI No PII View of two more waste aerosol cans in another trash receptacle that had been punctured.	
[Title] Observation_Image-2021042710060666634566.jpg 04/27/2021 10:06 AM (AKT) Jon Jones Main Building/Soldotna Shop No CBI No PII Close-up view of the two waste aerosol cans that had been punctured.	

Inspection Date(s):

04/27/2021 - 04/27/2021

[Title] Observation_Image-20210427100654654475887.jpg 04/27/2021 10:06 AM (AKT) Jon Jones Main Building/Soldotna Shop No CBI No PII Another view of the two waste aerosol cans that had been punctured.	
[Title] Observation_Image-202104271011271127214494.jpg 04/27/2021 10:11 AM (AKT) Jon Jones Main Building/Soldotna Shop No CBI No PII View of sand blast media being accumulated in a pan beneath the blasting cabinet.	

Inspection Date(s):

04/27/2021 - 04/27/2021

[Title]

Observation_Image-
202104271011501150333117.jpg

04/27/2021 10:11 AM (AKT)

Jon Jones

Main Building/Soldotna Shop

No CBI

No PII

Close-up view of sand blast media being accumulated in a pan beneath the blasting cabinet.



[Title]

Observation_Image-
20210427103507357675692.jpg

04/27/2021 10:35 AM (AKT)

Jon Jones

Main Building/Warm storage

No CBI

No PII

I observed two aerosol cans of survey marking paint that felt empty and appeared to be waste-like. Mr. Smith looked at the aerosol cans and verified that they were waste aerosol cans.



Inspection Date(s):

04/27/2021 - 04/27/2021

[Title]	
Observation_Image-202104271451495149229289.jpg	
04/27/2021 02:51 PM (AKT)	
Jon Jones	
Main Building/Warm storage	
No CBI	
No PII	
Mr. Smith put the waste aerosol cans into a 55-gallon container and labeled the container with the words "Hazardous Waste" during the inspection.	
[Title]	
Observation_Image-20210427145506556273579.jpg	
04/27/2021 02:55 PM (AKT)	
Jon Jones	
Main Building/Warm storage	
No CBI	
No PII	
Another view of the waste aerosol can container after Mr. Smith placed the label on the container.	

Inspection Date(s):

04/27/2021 - 04/27/2021

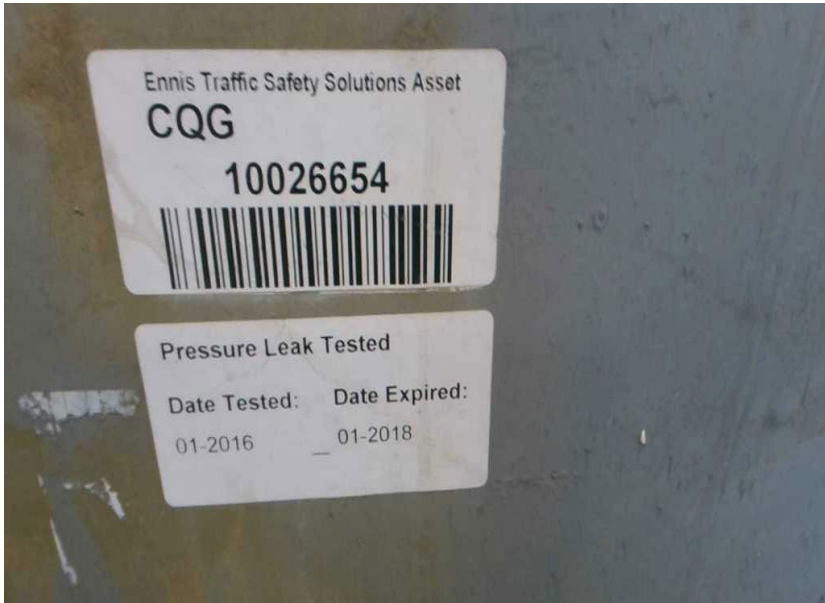
[Title]
Observation_Image- 202104271455155515237957.jpg
04/27/2021 02:55 PM (AKT)
Jon Jones
Main Building/Warm storage
No CBI
No PII
Close-up view of the label.
[Title]
Observation_Image- 202104271156445644309404.jpg
04/27/2021 11:56 AM (AKT)
Jon Jones
Sand shed
No CBI
No PII
View of the tote that holds the paint mixer.



Inspection Date(s):

04/27/2021 - 04/27/2021

[Title]	
Observation_Image-202104271156565656367626.jpg	
04/27/2021 11:56 AM (AKT)	
Jon Jones	
Sand shed	
No CBI	
No PII	
View of the dried paint that had dripped off the paint mixer.	

[Title]	
Observation_Image-20210427115709579265183.jpg	
04/27/2021 11:57 AM (AKT)	
Jon Jones	
Sand shed	
No CBI	
No PII	
View of the labeling on the tote.	

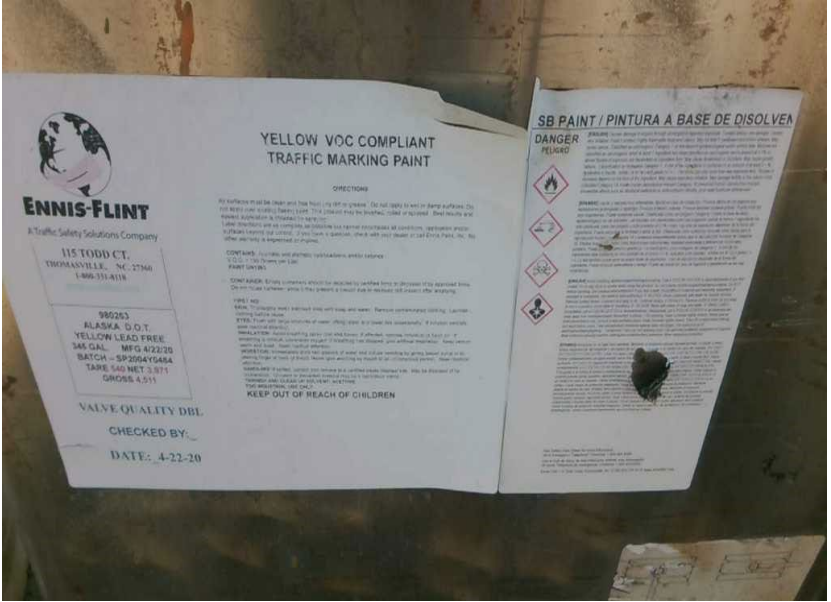
Inspection Date(s):

04/27/2021 - 04/27/2021

[Title]	
Observation_Image-20210427120248248482719.jpg	
04/27/2021 12:02 PM (AKT)	
Jon Jones	
Sand shed/South of the sand shed	
No CBI	
No PII	
View of the totes that contain new paint product.	
[Title]	
Observation_Image-20210427120315315334367.jpg	
04/27/2021 12:03 PM (AKT)	
Jon Jones	
Sand shed/South of the sand shed	
No CBI	
No PII	
Close-up view of the labeling on the tote containing White VOC Compliant Traffic Marking Paint.	

Inspection Date(s):

04/27/2021 - 04/27/2021

[Title]	
Observation_Image-20210427120345345298183.jpg	
04/27/2021 12:03 PM (AKT)	
Jon Jones	
Sand shed/South of the sand shed	
No CBI	
No PII	
Close-up view of the labeling on the tote containing Yellow VOC Compliant Traffic Marking Paint.	

Document Log

Document Type	Document Name	Contains CBI	Contains PII	Uploaded By	Date Received
Facility Map	Soldotna Maintenance Station drainage map.pdf	No	No	Jon Jones	07/02/2021
Other - Safety Data Sheet	Yellow Traffic Paint SDS.pdf	No	No	Jon Jones	07/02/2021
Other - Safety Data Sheet	Low VOC White SDS.pdf	No	No	Jon Jones	07/02/2021
Other - Safety Data Sheet	Corothane SDS.pdf	No	No	Jon Jones	07/02/2021
Records Review	HW Inv log.pdf	No	No	Jon Jones	07/02/2021
Records Review	Solvent usage log.pdf	No	No	Jon Jones	07/02/2021
Records Review	000297312FLE.pdf	No	No	Jon Jones	07/02/2021
Records Review	Manifest.pdf	No	No	Jon Jones	07/02/2021
Records Review	8700-12 (2).pdf	No	No	Jon Jones	07/02/2021
Records Review	8700-12.pdf	No	No	Jon Jones	07/02/2021
Records Review	Email chain regarding facility notification.pdf	No	No	Jon Jones	07/02/2021
Records Review	EPA ID paperwork.pdf	No	No	Jon Jones	07/02/2021
Records Review	000297312FLE.pdf	No	No	Jon Jones	07/02/2021
Records Review	Manifest.pdf	No	No	Jon Jones	07/02/2021
Inspection Reports	Field_Notes_AKR000203653v1.0.pdf	No	No	Jon Jones	07/02/2021