

INSPECTION REPORT

Inspection Entry Date/Time	08/30/2024 08:31 AM (PT)	Announced: No	
Inspection Exit Date/Time	08/30/2024 10:10 AM (PT)	Access: Granted	
Regulatory Program	RCRA		
Type of Inspection	Compliance Evaluation Inspection (CEI)		
Company Name	Tesoro Logistics Operations, LLC		
Facility or Site Name	Tesoro Logistics Operations, LLC		
Facility/Site Identifier	WAD000711556		
Facility/Site Physical Address	2211 St Francis Ln		
City, State, Zip Code	Vancouver, WA 98660		
County/Borough	Clark		
Generator Status	Very Small Quantity Generator (VSQG)		
NAICS	424710 – Petroleum Bulk Stations and Terminals		
Type of Operation	Bulk Fuel Terminal		
Geographic Coordinates	45.64054, -122.69487		
Mailing Address/Secondary Address	539 S Main Street ATTN: TERMINALS HESS Findlay, OH 45840 Serena Lewellyn, Environmental Specialist slewellyn@marathonpetroleum.com 1100 H and H Lane North Pole, AK 99705 CC: Micah Bardin, Terminal Manager dbardin@marathonpetroleum.com		
Permit Number (If Applicable)	Not Applicable		
Lead Inspector:			
Jon Jones	Jones, Jon	Digitally signed by Jones, Jon Date: 2024.11.07 07:48:09 -09'00'	
	EPA REGION 10	Jones.Jon@epa.gov	(907) 227-4316
Supervisor Review:			
Matthew Quarterman	MATTHEW QUARTERMAN	Digitally signed by MATTHEW QUARTERMAN Date: 2024.11.07 10:46:05 -08'00'	
	EPA REGION 10	Quarterman.Matthew@epa.gov	(206) 553-2146

SECTION I – INTRODUCTION

Site Entry and Purpose of the Inspection

Type of inspection: Compliance Evaluation Inspection (CEI)

EPA Region 10 Lead Inspector, Jon Jones, arrived at the Tesoro Logistics Operations, LLC Facility (the “Site” or “Facility”), located at 2211 St Francis Ln, Vancouver, WA 98660, at 08:31 AM (PT) on 08/30/2024 for an unannounced inspection. EPA Region 10 Lead Inspector presented credentials to and informed Micah Bardin that this was an EPA REGION 10 inspection to determine compliance with Resource Conservation and Recovery Act (RCRA).

The facility was inspected to ensure compliance with Washington’s federally authorized hazardous waste regulations found at Washington Administrative Code (WAC) 173-303. Specifically, the inspection assessed compliance with WAC 173-303-573 universal waste management standards, WAC 173-303-515 requirements for management of used oil, and WAC 173-303-170 through 230 standards for hazardous waste generators. The inspection was conducted as a core program requirement for fiscal year 2024.

This report is based on information supplied by Tesoro Logistics Operations, LLC Facility representatives, observations made by the EPA Region 10 inspector, and records and reports maintained by the facility, but not limited to: direct observations made by the EPA Region 10 Inspector(s), photographs taken by EPA Region 10 inspector(s), physical evidence collected by the EPA Region 10 inspector(s), measurements or samples taken by EPA Region 10 inspector(s), 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 Region 10 inspector(s) 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	Jon Jones	(907) 271-6329	Jones.Jon@epa.gov	Yes	Yes
Terminal Manager/Marathon Petroleum	Micah Bardin	(360) 696-2390	dbardin@marathonpetroleum.com	Yes	Yes

Opening Conference

After driving into the facility, I entered the facility office, met with facility personnel, and explained that this was an EPA Region 10 inspection to determine compliance with Resource Conservation and Recovery Act (RCRA).

During the opening conference, I explained that the focus of the RCRA inspection was to identify types of wastes generated, points of waste generation, methods of waste management, and review relevant documents.

Only those areas in which I observed potential compliance concerns or noted other pertinent issues are discussed in Section III of this inspection report.

Facility/Site Information

Number of employees	4
Length of Facility at Location	Since 1961
Operating Hours	6:00 a.m. to 4:00 p.m., Monday through Friday
Safety Training Provided to Inspector(s)?	Yes

Size of Facility	Approximately 6 acres
What type of generator facility notified?	Large Quantity Generator (LQG)
What type of generator facility verified as?	Very Small Quantity Generator (VSQG)
Weather Conditions	Sunny and warm

Tesoro Logistics Operations, LLC (Tesoro) has operated at this site since 1961. The Tesoro facility is used for bulk petroleum storage. Aboveground storage tanks are used to store diesel fuel, gasoline, off-spec materials, ethanol, fuel additives, B-99 bio diesel, and dyes. Diesel fuel and gasoline are generally received via pipeline. Ethanol is primarily received by rail car and sometimes trucks. Bio diesel is primarily received by trucks and has the potential to be received by railcar. Fuel additives are received by tanker truck and dye is received either by small bulk containers or via tanker trucks. Fuels are also received at the facility by ship and barge. They also have a Facility ID under SPCC/FRP: R10-WA-00048.

Process Description

Mr. Bardin told me the following about the facility's processes and waste streams:

- Tesoro became an LQG due to sludge removal, a process known as "653," from some of the 12 aboveground storage tanks.
- The most recent tank cleanout took place in October 2023.
- Tesoro was acquired by Marathon Petroleum, but the terminal continues to operate under the Tesoro brand name.

Mr. Bardin said that on 5/31/24 the facility's fire suppression system dumped AFFF due to a bad heat probe. The waste was shipped to Chemical Waste Management of the NW, Inc. in Arlington, OR.

I was accompanied during the inspection by Mr. Bardin. I looked at the facility's processes, 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 did not observe any universal waste or used oil during the inspection of the facility.

Building(s)

Building/Area/Sub-area	Process Description	Area of Concern
Tesoro Logistics		No
CAA		No

SECTION II – OBSERVATIONS

Building: Tesoro Logistics/CAA			
Observation #: JJ1-OB-001	Date: 08/30/2024	Contains AOC: No	Contains CBI: No
Person Interviewed: Micah Bardin		Title: Terminal Manager	
I went to inspect the facility’s central accumulation area (CAA) during my facility visit and saw that there was no hazardous waste in accumulation.			

Photo(s)

1. [IMG-2024083009440144184533.jpg](#)
2. [IMG-20240830094409449106300.jpg](#)

SECTION III – RECORDS REVIEW

Record: Personnel Training		AOC: No
Ref #: JJ1-RR-001	Reviewed By: Jon Jones	Reviewed Date: 08/30/2024
During the inspection, I reviewed the facility's hazardous waste training plan.		
Photo(s)		
1. IMG-20240830085055505587966.jpg 2. IMG-20240830085145514574075.jpg		
Record: Contingency Plan's Quick Reference Guide		AOC: No
Ref #: JJ1-RR-002	Reviewed By: Jon Jones	Reviewed Date: 08/30/2024
During the inspection, I reviewed the facility's distribution list for their Hazardous Waste Contingency Plan.		
Document(s)		
1. C Plan.pdf 2. Quick reference guide.pdf		
Photo(s)		
1. IMG-20240830085454545463782.jpg		
Record: Personnel Training		AOC: No
Ref #: JJ1-RR-003	Reviewed By: Jon Jones	Reviewed Date: 08/30/2024
During the inspection, I reviewed training records and saw that training for Mr. Don Dodge was close to expiring but still current as of the day of the inspection.		
Photo(s)		
1. IMG-20240830085722572274418.jpg 2. IMG-20240830085753575386797.jpg		
Record: Inspections		AOC: Yes
Ref #: JJ1-RR-004	Reviewed By: Jon Jones	Reviewed Date: 08/30/2024
I inspected the facility's weekly hazardous waste inspection logs and saw that no weekly inspection was conducted during the week of 6/16/24 through 6/22/24. During this week, the facility was a LQG of hazardous waste.		
Due to a release of AFFF, 4,819 gallons of waste AFFF was generated on 5/21/24. The facility managed the waste as hazardous with waste code D018 for benzene. The waste was in accumulation during the week of 6/16/24 through 6/22/24 and shipped off-site 7/1/24 on manifest #024165802 JJK.		
Photo(s)		
1. IMG-20240830091841184178079.jpg 2. IMG-20240830091853185377467.jpg		

Record: Manifests		AOC: No
Ref #: JJ1-RR-005	Reviewed By: Jon Jones	Reviewed Date: 08/30/2024
Reviewed hazardous waste manifest for disposal of AFFF, the facility generated on 5/21/24. The AFFF was designated D018 for benzene.		

SECTION IV – AREA OF CONCERN

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

Record: Inspections		
JJ1-RR-004		
No weekly inspection was conducted during the week of 6/16/24 through 6/22/24. The facility was an LQG during this week.	Regulation:	Sections:

SECTION V – CLOSING CONFERENCE AND FOLLOW UP**Closing Conference**

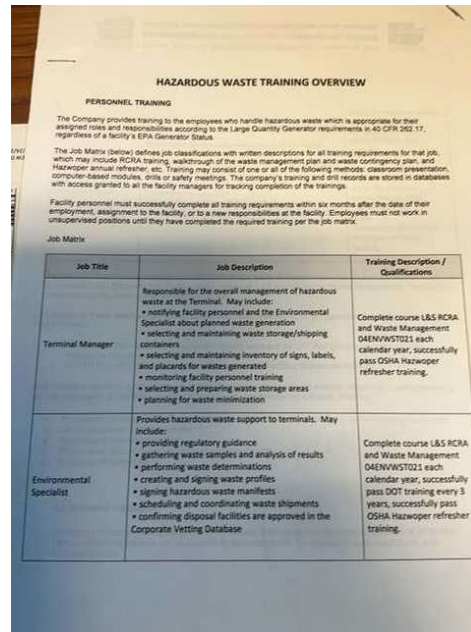
At the conclusion of the inspection, I conducted a closing conference that was attended by those listed in the Attendees table, in Section I of this report. I thanked Mr. Bardin for his time and cooperation during the inspection and began a review of the areas of concern (listed in Section III – Areas of Concern) that I observed during my inspection of the facility. 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. I told them the case officer would review the report to determine if any of my areas of concern documented violations.

Mr. Bardin asked that correspondence be sent to Ms. Serena Lewellyn with a copy sent to him.

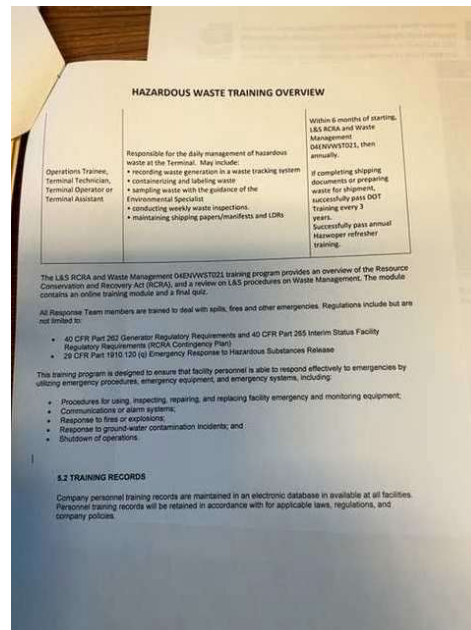
SECTION VI – SAMPLING ACTIVITIES AND ANALYTICAL RESULTS - No sampling was conducted.**SECTION VII – LIST OF APPENDICES**

1. Photo Log
2. Document Log

APPENDIX 1: PHOTO LOG



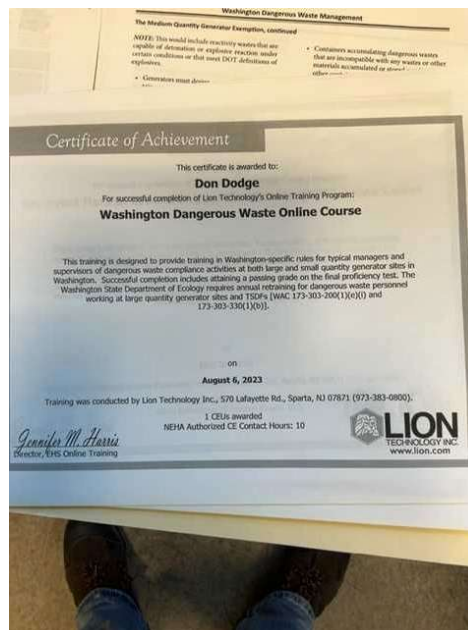
[Title]			IMG-20240830085055505587966.jpg
08/30/2024 08:50 AM (PT)	No CBI	No PII	Photographer: Jon Jones
[Building/Area]			45.63843612, -122.69698471
View of the facility's hazardous waste training plan.			



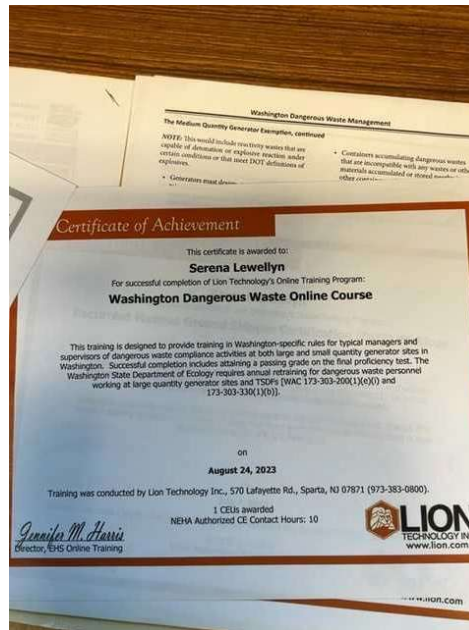
[Title]			IMG-20240830085145514574075.jpg
08/30/2024 08:51 AM (PT)	No CBI	No PII	Photographer: Jon Jones
[Building/Area]			45.63826136, -122.69721074
Another view of the facility's hazardous waste training plan.			



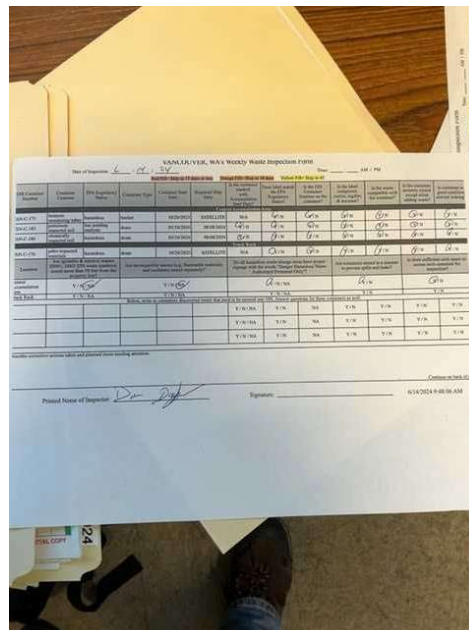
[Title]			IMG-20240830085454545463782.jpg
08/30/2024 08:54 AM (PT)	No CBI	No PII	Photographer: Jon Jones
[Building/Area]			45.63826111, -122.69721197
View of distribution letter for their Hazardous Waste Contingency Plan.			



[Title]			IMG-20240830085722572274418.jpg
08/30/2024 08:57 AM (PT)	No CBI	No PII	Photographer: Jon Jones
[Building/Area]			45.63826053, -122.69720361
View of training records for Don Dodge.			



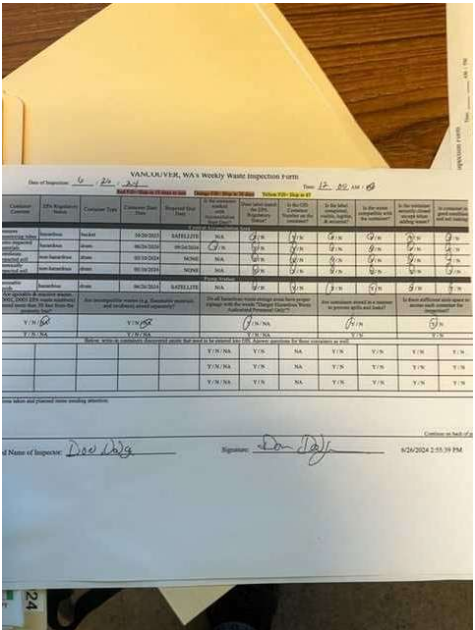
[Title]			IMG-20240830085753575386797.jpg
08/30/2024 08:57 AM (PT)	No CBI	No PII	Photographer: Jon Jones
[Building/Area]			45.63826064, -122.69720416
View of training records for Serena Lewellyn.			



[Title]			IMG-20240830091841184178079.jpg
08/30/2024 09:18 AM (PT)	No CBI	No PII	Photographer: Jon Jones
[Building/Area]			45.63826065, -122.69720371
View of the weekly inspection log for the week prior to the missed week of 6/16/24 through 6/22/24.			

Inspection Date(s):

08/30/2024 - 08/30/2024



[Title]			IMG-20240830091853185377467.jpg
08/30/2024 09:18 AM (PT)	No CBI	No PII	Photographer: Jon Jones
[Building/Area]			45.63833519, -122.69710656
View of the weekly inspection log for the week following the missed week of 6/16/24 through 6/22/24.			



[Title]			IMG-2024083009440144184533.jpg
08/30/2024 09:44 AM (PT)	No CBI	No PII	Photographer: Jon Jones
Tesoro Logistics/CAA			45.63845879, -122.69705228
View of the CAA with no waste onsite.			



[Title]			IMG-20240830094409449106300.jpg
08/30/2024 09:44 AM (PT)	No CBI	No PII	Photographer: Jon Jones
Tesoro Logistics/CAA			45.63845879, -122.69705228
Another view of the CAA with no waste onsite.			

APPENDIX 2: DOCUMENT LOG

Document Type	Document Name	Contains CBI	Contains PII	Uploaded By	Date Received
Records Review	C Plan.pdf	No	No	Jon Jones	11/01/2024
Records Review	Quick reference guide.pdf	No	No	Jon Jones	11/01/2024
Communications	Visitor Information Guide.pdf	No	No	Jon Jones	11/01/2024