

INSPECTION REPORT

Inspection Entry Date/Time	07/12/2023 10:45 AM (AKT)	Announced: No	
Inspection Exit Date/Time	07/12/2023 12:23 PM (AKT)	Access: Granted	
Regulatory Program	RCRA		
Type of Inspection	Compliance Evaluation Inspection (CEI)		
Company Name	North Slope Borough (NSB)		
Facility or Site Name	Oxbow Landfill		
Facility/Site Identifier	AKR000210245		
Facility/Site Physical Address	1234 Site 12 Road		
City, State, Zip Code	Prudhoe Bay, AK 99734		
County/Borough	North Slope Borough		
Generator Status	Very Small Quantity Generator (VSQG)		
NAICS	562212 – Solid Waste Landfill		
Type of Operation	Class 1 (Freeze back) Landfill for both Construction & Demolition (C&D) waste and Municipal Solid Waste (MSW).		
Geographic Coordinates	70.28556, -148.51875		
Mailing Address/Secondary Address	Eric Lervig, Landfill Supervisor elervig@iceservices.net 1234 Site 12 Road Prudhoe Bay, AK 99734 CC: Rich Helinski, Projects/Operations Manager rhelinski@iceservices.net Patricia Brower, NSB Landfill Liaison patricia.brower@north-slope.org Mike Monnin, NSB Landfill Liaison mike.monnin@north-slope.org Cynthia Trapp, NSB, DPW, Environmental Official cynthia.trapp@north-slope.org		
City, State, Zip Code	Prudhoe Bay, AK 99734		
Permit Number (If Applicable)	Not Applicable		
Lead Inspector:			
Jon Jones	JONATHAN JONES	Digitally signed by JONATHAN JONES Date: 2023.08.30 12:36:29 -08'00'	
	EPA Region 10	Jones.Jon@epa.gov	(907) 277-4316
Supervisor Review:			
Matt Quarterman	MATTHEW QUARTERMAN	Digitally signed by MATTHEW QUARTERMAN Date: 2023.08.31 15:56:11 -07'00'	
	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 Oxbow Landfill Facility (the "Site" or "Facility"), located at 1234 Site 12 Road, Prudhoe Bay, AK 99734, at 10:45 AM (AKT) on 07/12/2023 for an unannounced inspection. EPA Region 10 Lead Inspector presented credentials to and informed Eric Lervig that this was an EPA Region 10 inspection to determine compliance with Resource Conservation and Recovery Act (RCRA).

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 2023.

This report is based on information supplied by Oxbow Landfill Facility representatives, observations made by the EPA Region 10 inspector, and records and reports maintained by the facility and its HQ including, 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
RCRA Inspector/EPA Region 10	Matt Quarterman		quarterman.matthew@epa.gov	Yes	No
RCRA Inspector-in-training/ADEC	Alan Pefley			Yes	No
Landfill Supervisor/NSB Oxbow Landfill	Eric Lervig	(907) 670-1014	elervig@iceservices.net	Yes	Yes

Opening Conference

Shortly after arriving at the Oxbow Landfill, I called the phone number listed on the door and we were met in the landfill office by Mr. Eric Lervig, Landfill Supervisor and I held the opening conference.

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.

Mr. Lervig told us that the North Slope Borough owned the Oxbow Landfill. He told us he was a contractor with Ice Services. He said that Ice Services operated the landfill on behalf of the North Slope Borough. Mr. Lervig told us the landfill was a Class 1 freeze back landfill that started operating in the early 1980's. He told us the landfill operates under Solid Waste Permit #SW1A008-27. I reviewed a copy of the permit and saw that it expires on 4/30/2027.

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

Facility/Site Information

Number of employees	3
Length of Facility at Location	Since the early 1980s
Operating Hours	8:00 a.m. to 4:30 p.m. Monday – Saturday; 8:00 a.m. to 3:00 p.m. Sunday
Safety Training Provided to Inspector(s)?	No
Size of Facility	Unknown
What type of generator facility notified?	Non-Notifier
What type of generator facility verified as?	Verified Very Small Quantity Generator (VSQG) by Eric Lervig, Landfill Supervisor
Weather Conditions	Rainy

Process Description

According to Mr. Lervig, the following wastes are generated at the landfill:

- Used oil - managed through US Ecology.
- Used oil filters - hot drained, crushed and disposed of into the landfill.
- Used antifreeze - managed through US Ecology.
- Waste aerosol cans - waste aerosol cans that last contained product (paints, lubricants, and solvents) are punctured onsite with the empty aerosol cans being landfilled.
- Waste aerosol can residue - not being collected during can puncturing.
- Lead-acid batteries - recycled through Brooks Supply in Deadhorse, AK.
- Waste tool and radio batteries - managed through US Ecology.
- Waste lamps - lamps are changed out by another section of Ice Services and taken to the Ice Services camp site.

We were accompanied during the inspection by Mr. Lervig. We looked at the facility's processes, hazardous waste management practices, generation points, and accumulation areas. We looked for wastes that facility representatives had not yet identified or designated as hazardous.

Building(s)

Building/Area/Sub-area	Process Description	Area of Concern
Incinerator Building	Sorting of oily waste that comes into the landfill, double bagged, in ~27 cubic yard roll-off containers from entities operating within Prudhoe Bay, AK.	No
Maintenance Shop	Vehicle/equipment maintenance, generating used oil, used oil filters, used antifreeze, and lead-acid vehicle batteries.	Yes

	Waste aerosol cans are being punctured in the maintenance shop.	
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SECTION II – OBSERVATIONS

Building: Maintenance Shop			
Observation #: JJ1-OB-001	Date: 07/12/2023	Contains AOC: Yes	Contains CBI: No
Person Interviewed: Eric Lervig		Title: Landfill Supervisor	
While in the Maintenance Shop, we saw a 275-gallon tote that appeared to contain used oil. I asked Mr. Lervig if the tote contained used oil and he told us that it did. At the time of the inspection, the tote contained approximately 225-gallons of used oil and was not labeled with the words "Used Oil." I explained the regulation requiring that all used oil storage units be labeled, and Mr. Lervig labeled the tote with the words "Used Oil" during the inspection. At the time of the inspection, there was also a 55-gallon container that was being used to accumulate used oil from filter draining. This container was labeled with the words used oil.			
Photo(s) 1. IMG_1585.jpg 2. IMG_1587.jpg 3. IMG_1586.jpg 4. IMG_1588.jpg 5. IMG_1589.jpg			

Building: Maintenance Shop			
Observation #: JJ1-OB-002	Date: 07/12/2023	Contains AOC: Yes	Contains CBI: No
Person Interviewed: Eric Lervig		Title: Landfill Supervisor	
We returned to the Maintenance Shop after inspecting the Incinerator building. Mr. Lervig mentioned during the opening conference that his facility generates several waste aerosol cans each month that get punctured in the Maintenance Shop. Upon our return, I asked Mr. Lervig to show me where and how the waste aerosol cans were being punctured. Mr. Lervig told me that the waste aerosol cans were being punctured, using a hammer and a punch, on a bench in the shop. I asked him how the punctured aerosol cans were being managed and he told us that they were being disposed of into the scrap metal pile. I asked Mr. Lervig for the name of the scrap metal recycler that the landfill was using. Mr. Lervig told us that most of the time it was cost prohibitive for the metal to go to a recycler. He told us that, most of the time, the scrap metal gets landfilled onsite. I explained that VSQGs were required to manage their waste properly and suggested that they make a waste determination and either manage them as a hazardous waste or a universal waste without puncturing the aerosol cans.			
Photo(s) 1. IMG_1602.jpg 2. IMG_1603.jpg			

Building: Incinerator Building			
Observation #: JJ1-OB-003	Date: 07/12/2023	Contains AOC: No	Contains CBI: No

Person Interviewed: Eric Lervig**Title:** Landfill Supervisor

While inspecting the Incinerator building, we went to the area where the facility was sorting through oily waste that arrives in ~27 cubic yard roll-off containers from entities within the Prudhoe Bay oilfield. According to Mr. Lervig, the landfill burned the oily waste in incinerators that were operated in the landfill from ~2008 until ~2009/2010. In ~2009/2010, the North Slope Borough (NSB) purchased new incinerators, that were built by someone in Deadhorse, AK. These newly installed incinerators would be used to incinerate the oily waste that came into the landfill, however; the incinerators were shut down during start-up because they did not meet Clean Air Act (CAA) requirements and the incinerator doors were welded shut. According to Mr. Lervig, once the incinerators were shut down, they started sending the oily waste down to the lower 48 to be incinerated.

At the time of the inspection, there were two, ~27 cubic yard, roll-off containers in the Incinerator building. According to Mr. Lervig, one roll-off container (#68-25) held the oily waste that had come into the facility from Hilcorp's Milne Point facility and the other was being used to accumulate the less oily, oily waste. According to Mr. Lervig, the oily waste that comes into the facility ultimately goes to the City of Spokane, WA for incineration in their Waste to Energy facility. Mr. Lervig explained that prior to this waste going down to Spokane, WA., the incoming oily waste is sorted. Mr. Lervig told us there were items comingled with the oily waste that needed to be removed before it would be accepted by the Waste to Energy facility. According to Mr. Lervig, the following wastes are removed during the sorting process:

- Leather gloves
- Drained oil filters
- Trash
- Empty buckets
- Empty containers
- Gravel
- Rubber gloves

Mr. Lervig also told us that only those bags of oily waste that contain absorbent pads, booms, and materials that are heavily contaminated with oil go on to the Waste to Energy facility. He told us that the bags of oily waste that weren't heavily contaminated with oil are removed from the roll-off during the sorting process and placed into another roll-off container that eventually gets dumped into the landfill. He said that some of the less contaminated absorbents are pulled out and used to soak up the oil from the bags that just contain oily liquids.

Mr. Lervig went on to tell us that the bags of oily waste that are destined for the Waste to Energy facility, go into 1.7 cubic yard boxes. Once filled they are filled, the boxes are numbered and marked with the weight. He said that when the accumulation of oily waste boxes reaches 44,000 pounds, they ship the oily waste down to Spokane, WA. via Lyndon Transport. Lyndon Transport has a facility located in Deadhorse, AK.

Just outside the Incinerator building, we saw two additional roll-off containers of oily waste that required sorting. According to Mr. Lervig, the roll-off marked #6802 came in from Hilcorp's Prudhoe Bay Unit (PBU) Pad 9 and the other marked #6801 came in from Hilcorp's PBU Flow Station 1 (FS-1).

Photo(s)

1. [IMG_1590.jpg](#)
2. [IMG_1592.jpg](#)
3. [IMG_1593.jpg](#)
4. [IMG_1591.jpg](#)
5. [IMG_1594.jpg](#)
6. [IMG_1595.jpg](#)
7. [IMG_1596.jpg](#)
8. [IMG_1597.jpg](#)

SECTION III – RECORDS REVIEW

The facility is a VSQG and there were no records to review.

SECTION IV – AREA OF CONCERN

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

Building: Maintenance Shop	Area:	Sub-area:
JJ1-OB-001		
A tote containing approximately 225-gallons of used oil was not labeled with the words "Used Oil." Mr. Lervig labeled the tote with the words "Used Oil" during the inspection.	Regulations:	Sections:
Building: Maintenance Shop	Area:	Sub-area:
JJ1-OB-002		
Mr. Lervig told me that the waste aerosol cans were being punctured, using a hammer and a punch, on a bench in the shop.	Regulations:	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. Lervig 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 the 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.

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

SECTION VII – LIST OF APPENDICES

1. Photo Log

APPENDIX 1: PHOTO LOG



[Title]			IMG_1585.jpg
07/12/2023 11:17 AM	No CBI	No PII	Photographer: Jon Jones
Maintenance Shop			70.28545277, -148.51875277
View of 275-gallon used oil tote that is not labeled with the words "Used Oil."			



[Title]			IMG_1586.jpg
07/12/2023 11:17 AM	No CBI	No PII	Photographer: Jon Jones
Maintenance Shop			70.28545277, -148.51875277
Another view of the used oil tote, showing that it is not labeled with the words "Used Oil."			



[Title]			IMG_1587.jpg
07/12/2023 11:17 AM	No CBI	No PII	Photographer: Jon Jones
Maintenance Shop			70.28545277, -148.51875277
Close-up view of the used oil tote, showing that it is not labeled with the words "Used Oil."			



[Title]			IMG_1588.jpg
07/12/2023 11:19 AM	No CBI	No PII	Photographer: Jon Jones
Maintenance Shop			70.28545277, -148.51875277
View of a 55-gallon container being used to accumulate used oil. At the time of the inspection, this container was labeled with the words "Used Oil."			



[Title]			IMG_1589.jpg
07/12/2023 11:20 AM	No CBI	No PII	Photographer: Jon Jones
Maintenance Shop			70.28545277, -148.51875277
View of the used oil tote after being labeled with the words "Used Oil," during the inspection.			



[Title]			IMG_1590.jpg
07/12/2023 11:31 AM	No CBI	No PII	Photographer: Jon Jones
Incinerator Building			70.28527777, -148.5195
View of the roll-off containers in the oily waste sorting area. Container on the left contains oily waste from Hilcorp's Milne Point facility. Container on the right contains less contaminated oily waste that will be landfilled.			



[Title]			IMG_1591.jpg
07/12/2023 11:32 AM	No CBI	No PII	Photographer: Jon Jones
Incinerator Building			70.28526388, -148.51956111
View of the bags of oily waste that come into the facility prior to sorting.			



[Title]			IMG_1592.jpg
07/12/2023 11:32 AM	No CBI	No PII	Photographer: Jon Jones
Incinerator Building			70.28526388, -148.51957777
View inside of the roll-off that contains sorted oily waste that will be landfilled.			



[Title]			IMG_1593.jpg
07/12/2023 11:33 AM	No CBI	No PII	Photographer: Jon Jones
Incinerator Building			70.28526388, -148.51957777
View of less oily absorbents, that came in with oily waste, that will be used to soak up liquids in the bags of heavily contaminated oily waste.			



[Title]			IMG_1594.jpg
07/12/2023 11:34 AM	No CBI	No PII	Photographer: Jon Jones
Incinerator Building			70.28528611, -148.51962222
View of the boxed bags of oily waste that will be sent to the City of Spokane, WA. Waste to Energy facility.			



[Title]			IMG_1595.jpg
07/12/2023 11:47 AM	No CBI	No PII	Photographer: Jon Jones
Incinerator Building			70.28526944, -148.51959166
View of the incinerators that were shut down and are not in operation.			



[Title]			IMG_1596.jpg
07/12/2023 11:48 AM	No CBI	No PII	Photographer: Jon Jones
Incinerator Building			70.28526388, -148.51957777
Close-up view of the incinerator, showing that the door had been welded shut.			



[Title]			IMG_1597.jpg
07/12/2023 11:57 AM	No CBI	No PII	Photographer: Jon Jones
Incinerator Building			70.28511111, -148.52131666
View of additional roll-off containers holding bags of oily waste that require sorting. The roll-off on the left contains oily waste from Hilcorp's PBU Pad 9 and the roll-off on the right contains oily waste from Hilcorp's PBU Flow Station 1.			



[Title]			IMG_1602.jpg
07/12/2023 12:08 PM	No CBI	No PII	Photographer: Jon Jones
Maintenance Shop			70.28546111, -148.51876944
View of the bench and the punch used to puncture waste aerosol cans.			



[Title]			IMG_1603.jpg
07/12/2023 12:08 PM	No CBI	No PII	Photographer: Jon Jones
Maintenance Shop			70.28546111, -148.51875277
View of yellow paint on the bench where waste aerosol cans are punctured using a hammer and punch.			