EPA REGION 10 Enforcement and Compliance Assurance Division

INSPECTION REPORT

Inspection Entry Date/Time	06/06/2023 09:30 AM (PT)	Announced: No
Inspection Exit Date/Time	06/06/2023 02:25 PM (PT)	Access: Granted
Weather	46°F, Overcast, Drizzly	
Media	Water	
Statute/Program	Clean Water Act, NPDES, Industrial	
Type of Inspection	Compliance Evaluation Inspection	
Permittee Name	Petro Star Kodiak - North Pacific Fuel	
Facility or Site Name	Petro Star Kodiak – Bulk Petroleum Terminal	
Facility/Site Physical Address	715 Shelikof Street	
City, State, Zip Code	Kodiak, Alaska 99615	
Borough	Kodiak Island	
Facility GPS Coordinates	57.78483, -152.42387	
Mailing Address	3900 C Street	
City, State, Zip Code	Anchorage, Alaska 99503	
FRS ID	110025220990	
Permit Number	AK0029441	
SIC	5171 (Petroleum bulk stations & terminals)	

Lead Inspector:

RAYMOND ANDREWS Digitally signed by RAYMOND ANDREWS Date: 2023.07.12 11:30:49 -07'00'

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

Supervisor Review:

PETER CONTRERAS Digitally signed by PETER CONTRERAS Date: 2023.07.12 11:41:27 -07'00'

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

SECTION I – Opening Conference

I arrived at the Petro Star North Pacific Fuel Kodiak Terminal (the "Site" or "Facility"), located at 715 Shelikof Street, Kodiak, Alaska, at 09:30 AM (PT) on 06/06/2023 for an unannounced inspection. I presented my credentials to Rick Borton and informed him I was there to conduct an inspection to determine compliance with the Clean Water Act (CWA) and the facility's Alaska Pollutant Discharge Elimination System (APDES) permit, permit # AK0029441. This report is based on information supplied by Petro Star representatives, direct observations made by me, and records and reports maintained by the permittee. 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
North Pacific Fuel	Cleo Chernoff	Administrative Manager	Yes	Yes
North Pacific Fuel	Rick Borton	Kodiak Terminal Manager	Yes	Yes

Facility Information

Responsible Official	Lisa Lewis; llewis@petrostar.com
Type of Operation	The facility is a fuel distribution operation. The primary focus of the operation is the fueling of sea-going vessels. However, the facility does deliver fuel to some homes and businesses on Kodiak Island.
Size of Facility	The facility site is approximately 2.5 acres, which includes the upper and lower tank farms and the receiving and distribution terminal.
Outfalls	The site has three Outfalls. Outfall 001 (Terminal) – Water collected at the terminal goes to an underground storage tank with an oil/water separator. Once the influent passes through the oil/water separator, it is pumped to a 2,900 gallon above ground holding tank. Once the tank is full, its pH and temperature are tested, and it's visually observed for sheen prior to discharge into the storm drain. The storm drain flows to St Paul's Harbor. Outfall 002 (Upper Tank Farm) - Water is collected in a lined lagoon. When the lagoon is full, it is checked for pH, temperature, and sheen. If those parameters are within acceptable limits, the water is pumped over a containment wall into a field so it can infiltrate. If a sheen is observed, the water is pumped to the holding tank at Outfall 001 so it can go through the oil/water separator and then follows the path of Outfall 001. Outfall 003 (Lower Tank Farm) – Follows the same process as Outfall 002.
Does the facility self-analyze?	The facility monitors pH, flow, total aromatic hydrocarbon (TAH), and total aqueous hydrocarbon (TAqH).
Do you contract out for laboratory analyses?	Twice a year, the facility sends water samples to a contract lab for analysis of TAH and TAqH. The contract lab is: SGS North America Inc. 200 West Potter Drive Anchorage, Alaska 99518 (907) 562-2343
How many employees do you have? When does the facility operate?	The facility conducts year-round operations from 8:00 am until 5:00 pm, Monday through Friday. An "on-call" person is available on the weekends and after hours. The facility has a total of 11 employees, including four office personnel,

SECTION II – Observations

I did not observe any areas of concern during the site tour.

SECTION III – Records Review

Records may not be in sequential order.

Record: Other - Weekly Tank Farm and Pipeline Inspection Log		**AOC:** No
Ref #: RA1-RR-012	**Reviewed By:** Raymond Andrews	**Reviewed Date:** 06/06/2023
At the time of inspection, I reviewed the facility's Weekly Tank Farm and Pipeline Inspection Logs from January 2022 through june 2023. I did not find any issues.		
Record: Other - Oil/Water Separator Inspection Checklist		**AOC:** No
Ref #: RA1-RR-011	**Reviewed By:** Raymond Andrews	**Reviewed Date:** 06/06/2023
At the time of inspection, I reviewed the facility's oil/water separator inspection logs from January 2022 through May 2023. I did not find any issues.		
Record: Other - Letter from EPA to Facility		**AOC:** No
Ref #: RA1-RR-010	**Reviewed By:** Raymond Andrews	**Reviewed Date:** 06/06/2023
At the time of the inspection, I reviewed a letter, dated October 17, 2022, from EPA to the facility. The letter stated EPA had reviewed the facility's Facility Response Plan and it met the requirements of 40 CFR and the Clean Water Act. EPA informed the Facility its Response Plan was approved for 5-years ending October 17, 2027.		
Record: Other - Best Management Practice (BMP) Plan and BMP Review Certification		**AOC:** No
Ref #: RA1-RR-009	**Reviewed By:** Raymond Andrews	**Reviewed Date:** 06/06/2023
At the time of the inspection, I reviewed the facility's BMP plan, dated September 2020. I also reviewed the BMP Plan certification, dated January 31, 2022, for the 2021 reporting year. I did not find any issues with either document.		
Record: Other - ADEC Noncompliance Notification		**AOC:** No
Ref #: RA1-RR-008	**Reviewed By:** Raymond Andrews	**Reviewed Date:** 06/06/2023
At the time of inspection, I reviewed a Noncompliance Notification from the facility to the Alaska Department of Conservation (ADEC). The notification was dated February 9, 2021, and notified the state the facility did not conduct the 2021 annual review and certification of the Best Management Practices (BMP) plan by the January 31st deadline. The certification was subsequently submitted.		
Record: Other - Chain of Custody Record		**AOC:** No
Ref #: RA1-RR-007	**Reviewed By:** Raymond Andrews	**Reviewed Date:** 06/06/2023
At the time of the inspection, I reviewed a random chain of custody document, dated December 15, 2020. I did not find any issues.		
Record: Other - Secondary Containment Drainage Log		**AOC:** No
Ref #: RA1-RR-006	**Reviewed By:** Raymond Andrews	**Reviewed Date:** 06/06/2023
At the time of inspection, I reviewed the facility's Secondary Containment Drainage Log, dated May 10, 2023. The drainage log tracks the pH, if a sheen was observed, when the pumps were opened and closed, and the total gallons drained.		
Record: Other - pH Meter Calibration Logs		**AOC:** No
Ref #: RA1-RR-005	**Reviewed By:** Raymond Andrews	**Reviewed Date:** 06/06/2023
At the time of inspection, I reviewed the facility's pH Meter Calibration Logs from November 2022 through May 2023. The pH meter is calibrated prior to each use. I did not find any issues.		

Record: Other - Discharge Monitoring Reports (DMRs)		**AOC:** No
Ref #: RA1-RR-004	**Reviewed By:** Raymond Andrews	**Reviewed Date:** 06/06/2023
At the time of inspection, I reviewed the facility's Discharge Monitoring Reports (DMRs) from June 2018 through May 2023. I did not find any issues.		
Record: Other - Discharge Monitoring Report Data Sheet		**AOC:** No
Ref #: RA1-RR-002	**Reviewed By:** Raymond Andrews	**Reviewed Date:** 06/06/2023
At the time of the inspection, I reviewed the facility's Discharge Monitoring Report (DMR) working data sheet for May 2023.		
Record: Other - Quality Assurance Project Plan (QAPP)		**AOC:** Yes
Ref #: RA1-RR-001	**Reviewed By:** Raymond Andrews	**Reviewed Date:** 06/06/2023
At the time of the inspection, I reviewed the facility's Quality Assurance Project Plan (QAPP), dated September 3, 2020. I identified the following issues with the QAPP: • The QAPP was not prepared using the mandated guidance and requirements documents. • The QAPP did not show analytical detection and quantitation limits for each target compound or type and number of quality assurance field samples. • The QAPP did not show the training and qualifications of personnel. • The QAPP did not have the name and address of the contract lab.		

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-001	**Records Review: Other - Quality Assurance Project Plan (QAPP)**
Permit Requirement **Permit Part 2.1.6.4**, "At a minimum, a QAPP must include...Name, address, and telephone number of all laboratories used by or proposed to be used by the permittee."	
AOC: The QAPP did not have the name and address of the contract lab.	

AOC Reference #: RA1-RR-001	**Records Review: Other - Quality Assurance Project Plan (QAPP)**
Permit Requirement **Permit Part 2.1.6.3**, "At a minimum, a QAPP must include...Qualification and training of personnel..."	
AOC: The QAPP did not show the training and qualifications of personnel.	

AOC Reference #: RA1-RR-001	**Records Review: Other - Quality Assurance Project Plan (QAPP)**
Permit Requirement **Permit Part 2.1.6.1**, "At a minimum, a QAPP must include...analytical detection and quantitation limits for each target compound, type and number of quality assurance field samples..."	
AOC: The QAPP did not show analytical detection and quantitation limits for each target compound or type and number of quality assurance field samples.	

AOC Reference #: RA1-RR-001	Records Review: Other - Quality Assurance Project Plan (QAPP)
Permit Requirement **Permit Part 2.1.5**, "Throughout all sample collection and analysis activities, the permittee must use DEC approved QA/QC and chain-of-custody procedures, as described in the Requirements for Quality Assurance Project Plans (EPA/QA/R-5) and Guidance for Quality Assurance Project Plans (EPA/QA/G-5). The QAPP must be prepared in the format specified in these documents."	
AOC: The QAPP was not prepared using the guidance and requirements documents referenced in Permit Part 2.1.5. This is evidenced by the other QAPP related AOCs.	

SECTION VI – Closing Conference

I held a closing conference with Facility personnel at 02:25 PM (PT) on 06/06/2023. During the conference, I discussed the observations and Areas of Concern I 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 photo.

All photos taken during the inspection are included in the Photo Log; however, only photos that support an Area of Concern are included in the inspection report.

- P1010763 – DMR data sheet (Outfall 1), dated May 2023
- P1010764 – PSI Secondary Containment Drainage Log, dated May 10, 2023
- P1010765 – pH Meter Calibration Log, dated November 17, 2022 - May 24, 2023
- P1010766 – Chain of Custody Document, dated December 15, 2020
- P1010767 – Non-compliance Notification, February 9, 2021
- P1010768 – 2021 BMP Certification, dated January 31, 2022
- P1010769 – Letter - Review of Facility Response Plan, dated October 17, 2022
- P1010770 – O/W Separator Inspection Checklist, dated May 3, 2023, page 1
- P1010771 – O/W Separator Inspection Checklist, dated May 3, 2023, page 2
- P1010772 – Weekly Tank Farm and Inspection Log, dated June 3, 2023