

EPA REGION 10 Enforcement Division

INSPECTION REPORT

Inspection Entry Date/Time	08/06/2024 08:49 AM (AKT)	Announced: No
Inspection Exit Date/Time	08/06/2024 04:44 PM (AKT)	Access: Granted
Regulatory Program	Resource Conservation and Recovery Act (RCRA)	
Type of Inspection	Compliance Evaluation Inspection (CEI)	
Company Name	Alyeska Pipeline Service Company	
Facility or Site Name	Alyeska Taps Valdez Marine Terminal	
Facility/Site Identifier	AKD052581758	
Facility/Site Physical Address	300 Dayville Road, Pipeline MP 800	
City, State, Zip Code	Valdez, AK 99686	
County/Borough	Unorganized	
Generator Status	Large Quantity Generator (LQG)	
NAICS	48611 - Pipeline Transportation of Crude Oil	
Type of Operation	Crude Oil Terminal	
Geographic Coordinates	61.084857, -146.388531	
Mailing Address/Secondary Address	Allison Iverson, HSEC Director Allison.iverson@alyeska-pipeline.com Alyeska Pipeline Service Company P.O. Box 196660, MS 507 Anchorage, AK 99519 907-787-8061 CC: Gretchen W. Stoddard, Waste Management SME gretchen.stoddard@alyeska-pipeline.com	
City, State, Zip Code	Valdez, AK 99686	
Permit Number (If Applicable)	Not Applicable	
Lead Inspector:		
Jon Jones	Jones, Jon  Digitally signed by Jones, Jon Date: 2024.11.06 10:23:40 -09'00'	
	EPA Region 10	Jones.Jon@epa.gov (907) 271-6329
Supervisor Review:		
Matthew Quarterman	MATTHEW QUARTERMAN  Digitally signed by MATTHEW QUARTERMAN Date: 2024.11.15 14:12:50 -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: CEI

EPA Region 10 Lead Inspector, Jon Jones, arrived at the Alyeska Taps Valdez Marine Terminal Facility (the “Site” or “Facility”), located at 300 Dayville Road, Pipeline MP 800, Valdez, AK 99686, at 08:49 AM (AKT) on 08/06/2024 for an unannounced inspection. EPA Region 10 Lead Inspector presented credentials to and informed Dan Gilson 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 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 2024.

This report is based on information supplied by Alyeska Taps Valdez Marine Terminal 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
Waste Management SME /Alyeska Pipeline Service Company	Gretchen Stoddard	(907) 787-8946	gretchen.stoddard@alyeska-pipeline.com	No	Yes
VMT Director/Alyeska TAPS Valdez Marine Terminal (VMT)	Klint VanWingerden	(907) 787-8422	klinton.vanwingerden@alyeska-pipeline.com	Yes	Yes
VMT Operations Manager/Alyeska TAPS Valdez Marine Terminal (VMT)	Weston Branshaw	(907) 834-7557	weston.branshaw@alyeska-pipeline.com	Yes	Yes
Environmental Coordinator Supervisor /Alyeska TAPS Valdez Marine Terminal (VMT)	Cathy Gerard	(907) 450-5583	catherine.girard@alyeska-pipeline.com	Yes	No
VMT Environmental	Dan Gilson	(907) 834-7590	dan.gilson@alyeska-pipeline.com	Yes	Yes

Coordinator /Alyeska TAPS Valdez Marine Terminal (VMT)					
RCRA Inspector-in- training/ADEC	Grace Tapulgo	(907) 269- 7578	Grace.tapulgo@alaska.gov	Yes	Yes
RCRA Inspector-in- training/ADEC	Sable McGovern	(907) 269- 4556	Sable.mcgovern@alaska.gov	Yes	Yes

Opening Conference

Jon Jones, along with Alaska Department of Environmental Conservation (ADEC) Inspectors Grace Tapulgo and Sable McGovern arrived at the facility at 8:49 am and met with Valdez Marine Terminal (VMT) Environmental Coordinator, Dan Gilson, who led us to a conference room for the opening conference. We were joined by VMT Director Klint VanWingerden, VMT Operations Manager Weston Branshaw, and Environmental Coordinator Supervision Cathy Gerard.

During the opening conference we presented our inspector credentials, provided business cards, and informed the group that this was a routine hazardous waste compliance inspection in accordance with RCRA. We explained that the ADEC inspectors were accompanying the inspection for training purposes.

Additionally, we explained that the focus of the RCRA inspection was to identify and observe types of waste generated, points of waste generation, methods of waste management, and review related documents. These documents include manifests, hazardous waste training, and weekly inspections from the last three years. Dan Gilson provided us with a packet of the facility and map areas, which included each building at the VMT and their waste streams.

We were accompanied throughout the inspection by Dan Gilson. We were not denied access to any part of the facility, and we were allowed to take photographs.

Facility/Site Information

What type of generator facility verified as?	Large Quantity Generator (LQG) status verified by Mr. Gilson.
What type of generator facility notified?	LQG
Size of Facility	Approximately 1,000 acres
Safety Training Provided to Inspector(s)?	No
Operating Hours	24 hours a day/7 days a week
Length of Facility at Location	Since 1977
Number of employees	Approximately 200
Weather Conditions	Partly Cloudy

Process Description

The 800-mile long Trans Alaska Pipeline System (TAPS) transports crude oil from Prudhoe Bay's Pump Station 1 to the Alyeska Marine Terminal where it is stored in tanks prior to shipment. The process for cleaning these tanks includes emptying the tank, purging it, and removing tank bottoms. At the time of the inspection there were no tanks being cleaned out. Hazardous waste sources include, but are not limited to, pigging, sandblasting, and sumps.

Additional hazardous waste generated at this facility include waste leather gloves, waste paint, compressed gas cylinders, flammables in the form of ethyl alcohol and petroleum distillates, used oil, and corrosive wastes. They also generate universal waste aerosol cans, universal waste LED lamps, and universal waste batteries.

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. Lastly, we reviewed the facility records and documents that were available at the time of the inspection.

We inspected the areas of the facility listed in the building(s) table below.

Building(s)

Building/Area/Sub-area	Process Description	Area of Concern
Valdez Marine Terminal		Yes
Ballast Water Treatment (BWT) Sludge tank	Outdoor concrete slab near sludge tank with a few hazardous waste barrels.	Yes
BWT Sludge Tank Central Accumulation Area (CAA)	One 55-gal container of strainer sludge and a 55-gal container of non-hazardous diesel contaminated soil.	Yes
BWT	Ballast water treatment building, location of strainer waste SAA.	Yes
BWT Satellite Accumulation Area (SAA)	55-gal hazardous waste container of strainer waste SAA.	Yes
Pole Barn	Hazardous waste central accumulation area (CAA).	Yes
WS1b	Universal waste accumulation area for aerosols and compressed gas cylinders. None currently accumulated.	No
WS2b	Aerosol cans and compressed gas cylinders.	No
WS3a	Universal waste accumulation area for batteries.	No
WS3b	CAA for smaller waste paint containers, held in "Red Box".	Yes
Contaminated Soil Stockpile	Used for petroleum and lubricants that are non-hazardous.	No
East Tank Farm	Houses tanks, last tank clean out was May/June 2023.	Yes
Emergency Response Building (ERB)	Houses firetrucks and fire team for VMT. UW accumulation of batteries and waste aerosol cans.	Yes
Environmental Office	Universal waste accumulation of batteries and lamps.	No

Environmental Office UW Accumulation	Batteries and lamps.	No
Equipment shop	Area where used oil tank is stored.	Yes
Area next to oil tank	Catch pan for hoses transferring used oil from containers to large tank.	Yes
Lab	Where testing is conducted, Lab SAA located here.	Yes
Lab SAA	BTEX and oil and grease waste SAA.	Yes
Maintenance Shop	Repairs of VMT trucks and equipment done here. SAA for waste leather gloves. Universal waste accumulation of bulbs, batteries, and aerosol cans.	No
Maintenance Shop SAA	Waste leather gloves.	No
Medical Clinic	Where they handle prescription drugs and administer medical care.	No
Operations Office	SAA for waste leather gloves and universal waste accumulation of batteries.	No
Operations Office SAA	Waste leather gloves.	No
Oil Spill Building (OSB)	Oil spill containment equipment is stored here.	No
Partner Industrial (Connex)	Storage area of Connex box.	No
Connex	Storage Connex, contained pallet of Part-A Hardener.	No
Power Vapor	Universal accumulation of batteries, aerosol cans, lamps, and SAA of leather gloves.	No
Power Vapor UW Accumulation	Batteries, aerosol cans, lamps.	No
Safety Office	SAA for waste leather gloves.	No
Safety Office SAA	Waste Leather gloves.	No
Valdez Fabrication Facility (VFF) Shop	Houses metal, paint, and wood shop.	No
Metal Shop	Repairs for VMT done here. Accumulation of Bra-kleen rags and aerosol cans.	No
Paint shop	Generation point for waste paint.	Yes
Tatitlek Chenega Corporation (TCC)	Boom Repair Warehouse used by Oil Spill Response contractor, SAA that contained waste Trichloroethylene.	No
Wood Shop	Construction for VMT done here. SAA of leather gloves. Universal waste accumulation point for batteries and aerosol cans.	No

SECTION II – OBSERVATIONS

Building: Valdez Marine Terminal/Central Accumulation Area (CAA)/Pole Barn			
Observation #: JJ1-OB-001	Date: 08/06/2024	Contains AOC: Yes	Contains CBI: No
Person Interviewed: Dan Gilson		Title: VMT Environmental Coordinator	
We observed four, 55-gallon containers marked "hazardous waste" with no hazard indicators at the Pole Barn. There were two barrels of Isocyanates, one barrel of amines, and one barrel of C-Boiler refractory debris. Dan Gilson informed us that this barrel of C-Boiler refractory debris was awaiting a hazardous waste determination,			

and they were hoping to add it to their contaminated soil stockpile. The missing hazard indicators for these barrels were added at time of the inspection by Dan Gilson.

Additionally, there was one 55-gallon drum of recovered crude strainer waste that was labeled hazardous waste but was missing the hazard indicator. The hazard indicator was added at the time of the inspection by Dan Gilson.

Photo(s)

1. [IMG-20240806095002502137897.jpg](#)
2. [IMG-2024080609500850869111.jpg](#)
3. [IMG-20240806095015501585344.jpg](#)
4. [IMG-202408060950485048100511.jpg](#)
5. [IMG-2024080609510651678956.jpg](#)
6. [IMG-202408060955535553129449.jpg](#)
7. [IMG-20240806095600560107089.jpg](#)
8. [IMG-20240806095609569119898.jpg](#)
9. [IMG-202408060957445744111643.jpg](#)
10. [IMG-20240806095838583874527.jpg](#)
11. [IMG-20240806095846584680151.jpg](#)
12. [IMG-20240806095855585582992.jpg](#)
13. [IMG-20240806095957595797457.jpg](#)

Building: Valdez Marine Terminal/Central Accumulation Area (CAA)/WS3b

Observation #: JJ1-OB-002 **Date:** 08/06/2024 **Contains AOC:** Yes **Contains CBI:** No

Person Interviewed: Dan Gilson **Title:** VMT Environmental Coordinator

Dan Gilson led us to three waste storage containers. In Waste Storage 03b (WS3b) unit there was a large "Red Box" where all the hazardous waste is stored. The box was labeled "hazardous waste" and contained waste paint cans. The box was missing a hazard indicator. Dan Gilson marked the hazard indicator at the time of the inspection.

Photo(s)

1. [IMG-2024080610034434493087.jpg](#)
2. [IMG-2024080610035035086710.jpg](#)
3. [IMG-2024080610035635691139.jpg](#)
4. [IMG-2024080610090999102366.jpg](#)

Building: Valdez Marine Terminal/Central Accumulation Area (CAA)/WS1b

Observation #: JJ1-OB-003 **Date:** 08/06/2024 **Contains AOC:** No **Contains CBI:** No

Person Interviewed: Dan Gilson **Title:** VMT Environmental Coordinator

In Waste Storage 01b (WST1b) there was no hazardous or universal waste currently accumulated. There were no AOC's identified.

Building: Valdez Marine Terminal/Central Accumulation Area (CAA)/WS2b			
Observation #: JJ1-OB-004	Date: 08/06/2024	Contains AOC: No	Contains CBI: No
Person Interviewed: Dan Gilson		Title: VMT Environmental Coordinator	
In Waste Storage 02b (WST2b) we observed waste aerosol cans and compressed gas cylinders. There were no AOC's identified.			

Building: Valdez Marine Terminal/Ballast Water Treatment (BWT) Sludge tank/CAA			
Observation #: JJ1-OB-005	Date: 08/06/2024	Contains AOC: Yes	Contains CBI: No
Person Interviewed: Dan Gilson		Title: VMT Environmental Coordinator	
We observed a 55-gallon hazardous waste storage container of Stripper Sludge was not marked with a hazard indicator. Dan Gilson added the hazard indicator at the time of the inspection.			
Additionally, we observed a 55-gallon drum that was marked with a hazardous waste label. Dan Gilson stated that this drum was not hazardous waste, but rather diesel contaminated soil that was going to be put into the contaminated soil stockpile per allowance from ADEC.			
Photo(s)			
1. IMG-202408061024332433113802.jpg			
2. IMG-20240806102441244187972.jpg			
3. IMG-20240806102540254086306.jpg			
4. IMG-2024080610260126186861.jpg			
5. IMG-202408061029462946106801.jpg			
6. IMG-20240806102950295098246.jpg			

Building: Valdez Marine Terminal/Power Vapor/UW Accumulation			
Observation #: JJ1-OB-006	Date: 08/06/2024	Contains AOC: No	Contains CBI: No
Person Interviewed: Dan Gilson		Title: VMT Environmental Coordinator	
We observed the Universal Waste storage areas which included batteries, aerosol cans, bulbs, and an SAA container of waste leather gloves. There were no AOCs observed.			

Building: Valdez Marine Terminal/Contaminated soil stockpile			
Observation #: JJ1-OB-007	Date: 08/06/2024	Contains AOC: No	Contains CBI: No
Person Interviewed: Dan Gilson		Title: VMT Environmental Coordinator	
We observed the contaminated soil stockpile. Dan Gilson informed us that it is used for petroleum oils and lubricates that are non-hazardous. Additionally, Dan Gilson stated that the area’s water runoff goes through their wastewater treatment facility. There were no AOCs observed.			
Photo(s) 1. IMG-202408061105015197774.jpg			

Building: Valdez Marine Terminal/East Tank Farm			
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Observation #: JJ1-OB-008	Date: 08/06/2024	Contains AOC: Yes	Contains CBI: No
Person Interviewed: Dan Gilson		Title: VMT Environmental Coordinator	
During the inspection, while driving around the facility, I had Mr. Gilson stop the vehicle while we were in the area of last tank clean out, at Tank #8, that occurred back in May or June of 2023. While there, I told Mr. Gilson that I was aware of an EPA CID visit to the VMT regarding a complaint. Mr. Gilson told me that CID came out to investigate a complaint earlier in April of 2024. While I was viewing the area around Tank #8, from the vehicle, I asked Mr. Gilson to describe the tanks clean-out process. Mr. Gilson told me the following: • Crude oil is pumped from the storage tank, drawing the oil level down as low as possible, and sent to an oil tanker vessel. • 5 – 8K barrels (42 gal) of tank bottoms are sucked out of the storage tank with hoses and put into a couple of frac tanks where it is mixed with diesel and put into a slurry. • The slurry then goes through a centrifuge, separating the liquids and solids, with crude oil and diesel going back into tankage and the solids going into a tanks bottoms processing unit (TBPU) dryer. During my conversation with Mr. Gilson, I was told that no waste determination was made on the waste tank bottoms prior to going into the TBPU dryer. After the solids go through the TBPU dryer, a waste ash is generated. The waste ash is then shipped offsite to the Republic Moose Creek landfill. Mr. Gilson said that Alyeska made a waste determination for the waste ash and that the waste ash is not hazardous. Mr. Gilson said that 80 to 90 drums of waste tank bottoms was generated in either 2019 or 2020 due to issues with their contractor and the TBPU dryer being down. He said the waste tank bottoms were tested and determined to be a hazardous waste and were shipped offsite as hazardous waste. At the time of the inspection, Mr. Gilson said that the facility has been using the TBPU dryer since 2010. During the inspection, I asked for documentation (Manifests/LDRs) related to the 2019/2020 event when the waste tank bottoms was shipped out as well as analytical data for both the waste tanks bottoms and the waste ash. Mr. Gilson emailed the information to me on the day of the inspection which is included in the document log of this report.			
Document(s) 1. VMT HWR 8.28.19 012645739FLE.pdf 2. VMT HWR 8.17.19 012645731 FLE.pdf 3. VMT HWR 8.15.19 012645730 FLE.pdf 4. VMT HWR 8.13.19 012645729 FLE.pdf 5. 141351 Crude Tank Bottoms D018.docx 6. V19-079 TK8 TBP Haz Waste Char ALS Final Report 1194134.pdf 7. Profile 141351 Crude Tank Bottoms.pdf 8. V19-100 Tank 8 TBP Carbon Haz Waste Characterization ALS Final Report 1194201.pdf			
Photo(s) 1. IMG-2024080611134513452422587.jpg			

Building: Valdez Marine Terminal/Maintenance shop/SAA			
Observation #: JJ1-OB-009	Date: 08/06/2024	Contains AOC: No	Contains CBI: No
Person Interviewed: Dan Gilson		Title: VMT Environmental Coordinator	
We observed the SAA for waste leather gloves, as well as their universal waste areas for batteries, bulbs, and aerosol cans. There were no AOCs.			

Building: Valdez Marine Terminal/Equipment shop/Area next to oil tank

Observation #: JJ1-OB-010

Date: 08/06/2024

Contains AOC: Yes

Contains CBI: No

Person Interviewed: Dan Gilson

Title: VMT Environmental Coordinator

We observed a pan that catches used oil from a hose used to transfer the used oil from one container to their used oil tank. This pan contained used oil but was not labeled with the words "used oil". Dan Gilson had the pan marked with the words "Used Oil" at the time of the inspection.

Photo(s)

1. [IMG-20240806115512551293714.jpg](#)
2. [IMG-202408061155185518107964.jpg](#)
3. [IMG-20240806115523552380039.jpg](#)
4. [IMG-2024080611582358231742580.jpg](#)

Building: Valdez Marine Terminal/BWT/SAA

Observation #: JJ1-OB-011

Date: 08/06/2024

Contains AOC: Yes

Contains CBI: No

Person Interviewed: Dan Gilson

Title: VMT Environmental Coordinator

We observed a 55-gallon hazardous waste storage container of strainer waste that was not marked with a hazard indicator for toxicity. Dan Gilson marked the hazard indicator at the time of the inspection.

Photo(s)

1. [IMG-20240806131314131485224.jpg](#)
2. [IMG-20240806131321132171008.jpg](#)
3. [IMG-20240806131344134469635.jpg](#)

Building: Valdez Marine Terminal/Lab/SAA

Observation #: JJ1-OB-012

Date: 08/06/2024

Contains AOC: Yes

Contains CBI: No

Person Interviewed: Dan Gilson

Title: VMT Environmental Coordinator

Upon entering the laboratory building we observed a 5-gallon bucket of hazardous waste leather gloves. The bucket was labeled with the words "hazardous waste" but was missing a hazard indicator. Dan Gilson added the hazard indicator at the time of the inspection.

In the lab we observed a 2-gallon container of "BTEX" waste that was labeled "hazardous waste" but was missing a hazard indicator. Additionally, we found a 5-gallon container of "oil and grease waste" that was labeled "hazardous waste" but was missing a hazard indicator. Dan Gilson added hazard indicators to both containers at the time of the inspection. Dan Gilson clarified that the waste oil here was a hazardous waste and was not a used oil.

Photo(s)

1. [IMG-20240806132829282971636.jpg](#)
2. [IMG-20240806132837283761176.jpg](#)
3. [IMG-20240806132853285363158.jpg](#)
4. [IMG-20240806133322332262542.jpg](#)
5. [IMG-2024080613350435498722.jpg](#)
6. [IMG-2024080613350835860902.jpg](#)
7. [IMG-20240806133513351364805.jpg](#)
8. [IMG-20240806133519351963684.jpg](#)
9. [IMG-20240806133556355670527.jpg](#)

Building: Valdez Marine Terminal/Emergency Response Building (ERB)**Observation #:** JJ1-OB-013 **Date:** 08/06/2024 **Contains AOC:** Yes **Contains CBI:** No**Person Interviewed:** Dan Gilson **Title:** VMT Environmental Coordinator

When entering this part of the building we observed a 15-gallon container that held waste aerosol cans. The container was not labeled or marked clearly with any of the following phrases: "Universal Waste-Aerosol Can(s)," "Waste Aerosol Can(s)," or "Used Aerosol Can(s)." Dan Gilson added a "Universal Waste Aerosol Cans" label at the time of the inspection.

Additionally, in the "fire team area", an upstairs office, we observed a small bucket that contained two Nickle-Cadmium (NiCad) batteries labeled "universal waste" and had been in accumulation for greater than one year from the date the universal waste was generated of 7/23/23. Dan Gilson removed the batteries at the time of the inspection to be taken to the CAA where they would be picked up by their universal waste contractor.

Photo(s)

1. [IMG-20240806134023402373008.jpg](#)
2. [IMG-20240806134028402863672.jpg](#)
3. [IMG-20240806134034403457606.jpg](#)
4. [IMG-20240806134544454472410.jpg](#)
5. [IMG-20240806134551455165687.jpg](#)
6. [IMG-20240806135141514154868.jpg](#)
7. [IMG-20240806135150515060802.jpg](#)
8. [IMG-2024080613520052052010.jpg](#)

Building: Valdez Marine Terminal/Oil Spill Building (OSB)**Observation #:** JJ1-OB-014 **Date:** 08/06/2024 **Contains AOC:** No **Contains CBI:** No**Person Interviewed:** Dan Gilson **Title:** VMT Environmental Coordinator

No AOCs were identified.

Building: Valdez Marine Terminal/Valdez Fabrication Facility (VFF) Shop/Wood shop**Observation #:** JJ1-OB-015 **Date:** 08/06/2024 **Contains AOC:** No **Contains CBI:** No**Person Interviewed:** Dan Gilson **Title:** VMT Environmental Coordinator

We walked through their wood shop, looking at their SAA for waste leather gloves, and universal waste accumulation of batteries and aerosol cans. We did not identify any AOCs.

Building: Valdez Marine Terminal/Valdez Fabrication Facility (VFF) Shop/Metal shop

Observation #: JJ1-OB-016 **Date:** 08/06/2024 **Contains AOC:** No **Contains CBI:** No

Person Interviewed: Dan Gilson **Title:** VMT Environmental Coordinator

We observed their SAA for Brakleen rags and aerosol cans, no AOCs identified.

Building: Valdez Marine Terminal/Valdez Fabrication Facility (VFF) Shop/TCC

Observation #: JJ1-OB-017 **Date:** 08/06/2024 **Contains AOC:** No **Contains CBI:** No

Person Interviewed: Dan Gilson **Title:** VMT Environmental Coordinator

We observed the SAA that contained waste Trichloroethylene, there were no AOCs. Dan Gilson also informed us that they have a contractor who handles their oil spill work at the facility.

Building: Valdez Marine Terminal/Valdez Fabrication Facility (VFF) Shop/Paint shop

Observation #: JJ1-OB-018 **Date:** 08/06/2024 **Contains AOC:** No **Contains CBI:** No

Person Interviewed: Dan Gilson **Title:** VMT Environmental Coordinator

As we walked through the paint shop, we came upon two 5-gallon buckets of paint that Dan Gilson could not identify whether they were waste or not. Dan Gilson then reached out to the operator of the paint shop who identified the paint as still being utilized and not waste. Therefore, no AOCs were identified.

Photo(s)

1. [IMG-2024080614330833898491.jpg](#)
2. [IMG-2024080614332233222061089.jpg](#)

Building: Valdez Marine Terminal/Partner Industrial /Connex

Observation #: JJ1-OB-019 **Date:** 08/06/2024 **Contains AOC:** No **Contains CBI:** No

Person Interviewed: Dan Gilson **Title:** VMT Environmental Coordinator

In the Connex we saw a pallet of part A-hardener. There were no AOCs observed.

Photo(s)

1. [IMG-202408061443044341821535.jpg](#)

Building: Valdez Marine Terminal/Operations Office/SAA

Observation #: JJ1-OB-020 **Date:** 08/06/2024 **Contains AOC:** No **Contains CBI:** No

Person Interviewed: Dan Gilson **Title:** VMT Environmental Coordinator

We observed waste leather gloves and UW batteries. There were no AOCs.

Building: Valdez Marine Terminal/Environmental Office/UW accumulation

Inspection Date(s):

08/06/2024 - 08/06/2024

Observation #: JJ1-OB-021	Date: 08/06/2024	Contains AOC: No	Contains CBI: No
Person Interviewed: Dan Gilson		Title: VMT Environmental Coordinator	
We walked through the environmental office and observed their UW including batteries, and bulbs. There were no AOCs identified.			

Building: Valdez Marine Terminal/Safety office/SAA			
Observation #: JJ1-OB-022	Date: 08/06/2024	Contains AOC: No	Contains CBI: No
Person Interviewed: Dan Gilson		Title: VMT Environmental Coordinator	
We observed a 5-gallon SAA bucket for waste leather gloves. There were no AOCs observed.			

Building: Valdez Marine Terminal/Medical clinic			
Observation #: JJ1-OB-023	Date: 08/06/2024	Contains AOC: No	Contains CBI: No
Person Interviewed: Dan Gilson		Title: VMT Environmental Coordinator	
We inspected the onsite clinic at the facility. According to facility personnel, they do not generate hazardous waste pharmaceuticals. Non-hazardous waste drugs are placed into a drug deactivation container. No AOCs were observed.			

SECTION III – RECORDS REVIEW

Record: Inspections		AOC: Yes
Ref #: JJ1-RR-001	Reviewed By: Jon Jones	Reviewed Date: 08/06/2024
After inspecting the last three years of weekly inspections (8/6/21 through 8/6/24), the log was found to be complete with no weeks missed. However, based on the repetitive AOCs identified throughout the inspection, with regard to missing hazard indicators, there is concern that the facility is not conducting adequate inspections due to not catching this issue.		
We requested that Dan Gilson send us the last five weeks of inspections by email following the inspection. Mr. Gilson emailed the last five inspection logs to me on the day of the inspection.		
Document(s)		
1. 7.7.24 VMT WCIL DG.pdf 2. 7.14.24 VMT WCIL DG.pdf 3. 7.21.24 VMT WCIL MK.pdf 4. 7.28.24 VMT WCIL AB.pdf 5. 8.4.24 VMT WCIL AJ.pdf		
Record: Waste Determination Documents		AOC: No
Ref #: JJ1-RR-002	Reviewed By: Jon Jones	Reviewed Date: 08/06/2024
During the inspection, I asked Mr. Gilson to send me analytical data for both the waste ash generated in the TBPU dryer and the tank bottoms waste that was generated when the TBPU was not operating. Mr. Gilson emailed the analytical results to me on the day of the inspection.		
Record: Manifests		AOC: Yes

Ref #: JJ1-RR-003

Reviewed By: Jon Jones

Reviewed Date: 08/06/2024

During the inspection, I asked Mr. Gilson for copies of the manifests for the shipment of waste tank bottoms that were generated back in 2019/2020 when the TBPU was down. Mr. Gilson emailed those manifests to me on the day of the inspection.

Following the inspection, I emailed Ms. Gretchen Stoddard, SME, and requested copies of records which is routine, as the bulk of documentation required for LQGs is maintained at their office in Anchorage, AK. My request for these manifests (8/6/21 through 8/6/24), along with other documentation, was sent to the facility on September 19, 2024. In that email, I asked for the documents to be provided on or before October 4, 2024. My request for documents was followed by an email from Alyeska requesting an extension to provide the requested documentation on or before October 18, 2024. I approved the extension.

The requested documentation was received from the facility in two batches. Documents were received on October 18, 2024, and additional documentation was received on October 24, 2024. While inspecting the documentation received on October 24, 2024, hazardous waste manifest 013166999FLE, dated 03-21-2022, had not been signed or dated by the designated facility.

SECTION IV – AREA OF CONCERN

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

Building: Valdez Marine Terminal	Area: Central Accumulation Area (CAA)	Sub-area: Pole Barn
JJ1-OB-001		
Four, 55-gallon containers were not marked with hazard indicators.	Regulation:	Sections:
Building: Valdez Marine Terminal	Area: Central Accumulation Area (CAA)	Sub-area: Pole Barn
JJ1-OB-001		
One, 55-gallon container of recovered crude strainer waste was not marked with a hazard indicator.	Regulation:	Sections:
Building: Valdez Marine Terminal	Area: Central Accumulation Area (CAA)	Sub-area: WS3b
JJ1-OB-002		
Large "Red Box" containing hazardous waste paint was not marked with a hazard indicator.	Regulation:	Sections:
Building: Valdez Marine Terminal	Area: Ballast Water Treatment (BWT) Sludge tank	Sub-area: CAA
JJ1-OB-005		

A 55-gallon hazardous waste storage container of Stripper Sludge was not marked with a hazard indicator. Dan Gilson marked the container with hazard indicator at the time of the inspection.	Regulation:	Sections:
Building: Valdez Marine Terminal	Area: Equipment shop	Sub-area: Area next to oil tank
JJ1-OB-010		
Catch pan that held used oil was not labeled with the words "used oil".	Regulation:	Sections:
Building: Valdez Marine Terminal	Area: BWT	Sub-area: SAA
JJ1-OB-011		
55-gallon hazardous waste storage container of strainer waste was not marked with a hazard indicator for toxicity.	Regulation:	Sections:
Building: Valdez Marine Terminal	Area: Lab	Sub-area: SAA
JJ1-OB-012		
5-gallon bucket of hazardous waste leather gloves was not marked with a hazard indicator.	Regulation:	Sections:
Building: Valdez Marine Terminal	Area: Lab	Sub-area: SAA
JJ1-OB-012		
2-gallon container of "BTEX" waste that was not marked with a hazard indicator.	Regulation:	Sections:
Building: Valdez Marine Terminal	Area: Lab	Sub-area:
JJ1-OB-012		
5-gallon container of "oil and grease waste" was not marked with a hazard indicator.	Regulation:	Sections:
Building: Valdez Marine Terminal	Area: Emergency Response Building (ERB)	Sub-area:
JJ1-OB-013		

15-gallon container that held waste aerosol cans was not labeled or marked clearly with any of the following phrases: "Universal Waste-Aerosol Can(s)," "Waste Aerosol Can(s)," or "Used Aerosol Can(s)."	Regulation:	Sections:
Building: Valdez Marine Terminal	Area: Emergency Response Building (ERB)	Sub-area: Upstairs Office
JJ1-OB-013		
Small bucket that contained two waste NiCad batteries and was labeled "Universal Waste" and dated 7/23/23 had been in accumulation for greater than one year from the date the universal waste was generated.	Regulation:	Sections:
Building: Valdez Marine Terminal	Area: East Tank Farm	Sub-area:
JJ1-OB-008		
Possible treatment of hazardous waste without a permit.	Regulation:	Sections:
Record: Inspections		
JJ1-RR-001		
Not conducting adequate inspections.	Regulation:	Sections:
Record: Inspections		
JJ1-RR-003		
Manifest 013166999FLE was not signed or dated by the designated facility.	Regulation:	Sections:

SECTION V – CLOSING CONFERENCE AND FOLLOW UP

Closing Conference

At the close of the inspection, we reconvened with Dan Gilson VMT Environmental Coordinator, Klint VanWingerden VMT Director, Weston Branshaw Operations Manager, and were joined by Gretchen Stoddard Waste Management SME to conduct the closing conference. I thanked them for their time and cooperation during the inspection and began the review of the areas of concern identified during the inspection which are included in Section IV of this report.

Additionally, I told Ms. Stoddard that I would send her an email requesting documents. I explained the process that would take place once the final report was finished and submitted. Finally, I explained that they would receive a copy of the report, as would a case officer. We answered any questions they had and departed the facility at 4:45 pm.

Follow Up

I sent a request for documentation email, via the Go Anywhere platform, to Ms. Stoddard on 9/16/24 requesting the following information:

1. Copies of hazardous waste manifests, LDRs, and any applicable exception reports for the last three years, covering the period from August 6, 2021, through August 6, 2024.
2. A copy of the facility's Training Plan and/or training provided to VMT personnel and training records for VMT personnel that manage hazardous and universal waste.
3. Copies of job titles for positions related to hazardous waste management and the name of the employee filling each job, written job description for each position, and written description of type and amount of both introductory and continuing training.
4. Copies of any emergency responder agreements.
5. A copy of the VMT Hazardous Waste Contingency Plan and Quick Reference Guide.
6. A map and/or drawing of the tanks located at your facility where tank bottoms are generated during periodic tank clean-outs.
7. A list of those tanks, their identification number, as well as each tanks capacity and clean-out schedule.
8. For the tanks identified in question 7, please provide information on each tank's clean-out since the VMT started processing tank bottoms to include:
 - Dates of each tank clean-out and quantity of tank bottoms generated during each clean-out.
 - Total amount of tank bottoms generated and/or processed on-site.
 - Name of Contractor, contact information, and name of contractor point-of-contact that processed the tank bottoms on-site.
 - Total amount of ash generated as a result of processing as well as disposal paperwork associated with the ash. Please also include copies of manifests and/or bill of lading, waste profiles and/or analytical results, and shipping company and disposal location contact information.
9. Please also provide the following information regarding the VMT's Tank Bottoms Processing:
 - The date that Alyeska's VMT commenced on-site Tank Bottoms Processing.
 - Documentation and records of Alyeska's decision to initiate Tank Bottoms Processing at the VMT, and at what level was this decision made? Please also provide copies of any internal email traffic regarding the decision to initiate Tank Bottoms Processing at the VMT.

Please provide this documentation and/or information on or before October 4, 2024. Please contact me if you have any questions or require additional time to provide the requested information.

This was followed by a Teams meeting requested by Ms. Stoddard and Mr. Jan Shifflett, Alyeska Environmental Manager, to discuss the requested information in items #8 and #9 listed above.

During the Teams meeting, Mr. Shifflett talked about the TBPU and its operation. During the discussion, Mr. Shifflett said that the operation of the TBPU actually started around 2002. He said that an EPA inspection was conducted in 2004 and following the inspection, an EPA information request was sent to the Alyeska VMT. Mr. Shifflett and Ms. Stoddard indicated that my requests in #8 and #9 above would be labor intensive and that some of the requested information may no longer exist. Mr. Shifflett asked if they could provide the information from the 2005 information request in lieu of the information requested in items #8 and #9. Mr. Shifflett said he thought their response to the previous information request contained most of the information that I was requesting. I told them that I would be willing to do that, but indicated that after the review of the information, the items in #8 and #9 may still need to be provided.

The information requested was provided by the facility in emails dated October 18, 2024, and October 24, 2024. This requested information was received after this inspection report was completed and is not included in the Document Log of this report.

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



Pole Barn: Four 55-gal Drums Missing Hazard Indicators			IMG-20240806095002502137897.jpg
08/06/2024 09:50 AM (AKT)	No CBI	No PII	Photographer: Jon Jones
Valdez Marine Terminal/Central Accumulation Area (CAA)			61.08458709, -146.35951232
No hazard indicators on these four 55-gallon drums of hazardous waste, located at the Pole Barn.			



Drum 1: 55-gal Drum of Isocyanates			IMG-2024080609500850869111.jpg
08/06/2024 09:50 AM (AKT)	No CBI	No PII	Photographer: Jon Jones
Valdez Marine Terminal/Central Accumulation Area (CAA)			61.08458709, -146.35951232
No hazard indicator on 55-gallon Drum 1 of Isocyanates.			



Drum 2: 55-gal Drum of Isocyanates			IMG-20240806095015501585344.jpg
08/06/2024 09:50 AM (AKT)	No CBI	No PII	Photographer: Jon Jones
Valdez Marine Terminal/Central Accumulation Area (CAA)			61.08458421, -146.35950731
No hazard indicator on 55-gallon Drum 2 of Isocyanates.			



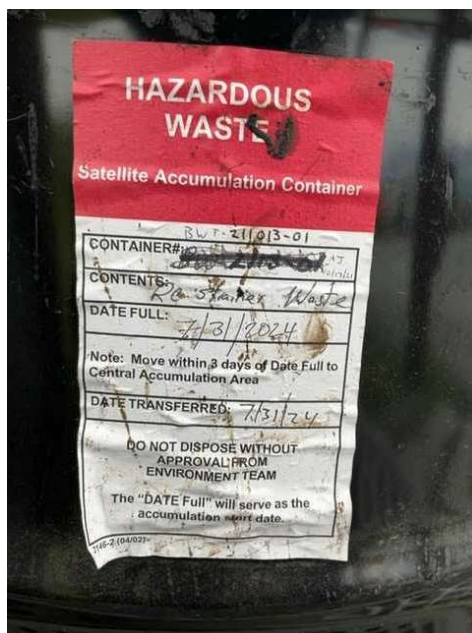
55-gal Drum of C-Boiler Refractory Debris			IMG-202408060950485048100511.jpg
08/06/2024 09:50 AM (AKT)	No CBI	No PII	Photographer: Jon Jones
Valdez Marine Terminal/Central Accumulation Area (CAA)			61.08458456, -146.35950835
No hazard indicator on 55-gallon drum of C- Boiler Refractory Debris. Holding for test results.			



55-gal Drum of Amines			IMG-2024080609510651678956.jpg
08/06/2024 09:51 AM (AKT)	No CBI	No PII	Photographer: Jon Jones
Valdez Marine Terminal/Central Accumulation Area (CAA)			61.08458456, -146.35950835
No hazard indicator on 55-gallon drum of Amines.			



55-gal Drum of Crude Strainer Waste			IMG-202408060955535553129449.jpg
08/06/2024 09:55 AM (AKT)	No CBI	No PII	Photographer: Jon Jones
Valdez Marine Terminal/Central Accumulation Area (CAA)			61.08458388, -146.359508
No hazard indicator for one 55-gallon drum of crude strainer waste.			



Crude Strainer Waste Label: Missing Hazard Indicator			IMG-20240806095600560107089.jpg
08/06/2024 09:56 AM (AKT)	No CBI	No PII	Photographer: Jon Jones
Valdez Marine Terminal/Central Accumulation Area (CAA)			61.08458388, -146.359508
No hazard indicator on label of 55-gallon drum of crude strainer waste.			



Back of 55-gal Drum of Crude Strainer Waste			IMG-20240806095609569119898.jpg
08/06/2024 09:56 AM (AKT)	No CBI	No PII	Photographer: Jon Jones
Valdez Marine Terminal/Central Accumulation Area (CAA)			61.08458388, -146.359508
Additional picture showing that there was no hazard indicator on the 55-gallon drum of crude strainer waste.			



Hazard Indicator for Crude Strainer Waste Drum Marked			IMG-202408060957445744111643.jpg
08/06/2024 09:57 AM (AKT)	No CBI	No PII	Photographer: Jon Jones
Valdez Marine Terminal/Central Accumulation Area (CAA)			61.08458414, -146.35950806
Missing hazard indicator marked at time of inspection by Dan Gilson.			



Hazard Indicator for Drum 1 of Isocyanates Marked			IMG-20240806095838583874527.jpg
08/06/2024 09:58 AM (AKT)	No CBI	No PII	Photographer: Jon Jones
Valdez Marine Terminal/Central Accumulation Area (CAA)			61.08458414, -146.35950806
Missing hazard indicator added at time of inspection by Dan Gilson.			



Hazard Indicator for Drum 2 of Isocyanates Marked			IMG-20240806095846584680151.jpg
08/06/2024 09:58 AM (AKT)	No CBI	No PII	Photographer: Jon Jones
Valdez Marine Terminal/Central Accumulation Area (CAA)			61.08458414, -146.35950806
Missing hazard indicator added at time of inspection by Dan Gilson.			



Hazard Indicator for Amines Drum Marked			IMG-20240806095855585582992.jpg
08/06/2024 09:58 AM (AKT)	No CBI	No PII	Photographer: Jon Jones
Valdez Marine Terminal/Central Accumulation Area (CAA)			61.08458414, -146.35950806
Missing hazard indicator added at time of inspection by Dan Gilson.			



Hazard indicator for C-Boiler Refractory Debris Drum Marked			IMG-20240806095957595797457.jpg
08/06/2024 09:59 AM (AKT)	No CBI	No PII	Photographer: Jon Jones
Valdez Marine Terminal/Central Accumulation Area (CAA)			61.0845782, -146.35950308
Missing hazard indicator added at time of inspection by Dan Gilson.			



Red Box in Waste Storage 03			IMG-2024080610034434493087.jpg
08/06/2024 10:03 AM (AKT)	No CBI	No PII	Photographer: Jon Jones
Valdez Marine Terminal/Central Accumulation Area (CAA)			61.08458964, -146.35951232
Hazardous waste storage box in with no hazard indicator.			

Inspection Date(s):

08/06/2024 - 08/06/2024



Label on Red Box in Waste Storage 03			IMG-2024080610035035086710.jpg
08/06/2024 10:03 AM (AKT)	No CBI	No PII	Photographer: Jon Jones
Valdez Marine Terminal/Central Accumulation Area (CAA)			61.08458964, -146.35951232
Hazard indicator missing on Red Box in Waste Storage 03.			



Hazardous Waste Label on Red Box			IMG-2024080610035635691139.jpg
08/06/2024 10:03 AM (AKT)	No CBI	No PII	Photographer: Jon Jones
Valdez Marine Terminal/Central Accumulation Area (CAA)			61.08458964, -146.35951232
Label on Red Box in Waste Storage 03 missing hazard indicator.			



Hazardous Waste Indication on Red Box Marked			IMG-2024080610090999102366.jpg
08/06/2024 10:09 AM (AKT)	No CBI	No PII	Photographer: Jon Jones
Valdez Marine Terminal/Central Accumulation Area (CAA)			61.08458964, -146.35951232
Hazard indicator on Red Box in Waste Storage 03 added at time of inspection.			



Organization Photo of Waste Storage Containers			IMG-2024080610095595556382.jpg
08/06/2024 10:09 AM (AKT)	No CBI	No PII	Photographer: Jon Jones
Valdez Marine Terminal/Central Accumulation Area (CAA)			61.08458964, -146.35951232
Photo of the organization and labeling of the Waste Storage Containers Located at the CAA.			



55-gal Drum of Stripper Sludge			IMG-202408061024332433113802.jpg
08/06/2024 10:24 AM (AKT)	No CBI	No PII	Photographer: Jon Jones
Valdez Marine Terminal/Ballast Water Treatment (BWT) Sludge tank			61.08458963, -146.35951232
55-gallon hazardous waste storage container of stripper sludge was not marked with a hazard indicator.			



Stripper Sludge Label Missing Hazard Indicator			IMG-20240806102441244187972.jpg
08/06/2024 10:24 AM (AKT)	No CBI	No PII	Photographer: Jon Jones
Valdez Marine Terminal/Ballast Water Treatment (BWT) Sludge tank			61.08458963, -146.35951232
55-gallon hazardous waste storage container of stripper sludge was not marked with a hazard indicator.			

Inspection Date(s):

08/06/2024 - 08/06/2024



Stripper Sludge Label with Hazard Indicator			IMG-20240806102540254086306.jpg
08/06/2024 10:25 AM (AKT)	No CBI	No PII	Photographer: Jon Jones
Valdez Marine Terminal/Ballast Water Treatment (BWT) Sludge tank			61.08458963, -146.35951232
Hazard Indicator added at time of inspection.			



Stripper Sludge Label with Hazard Indicator Marked			IMG-2024080610260126186861.jpg
08/06/2024 10:26 AM (AKT)	No CBI	No PII	Photographer: Jon Jones
Valdez Marine Terminal/Ballast Water Treatment (BWT) Sludge tank			61.08458963, -146.35951232
Hazard indicator added at time of the inspection.			



55-gal Container of Non-Hazardous Waste			IMG-202408061029462946106801.jpg
08/06/2024 10:29 AM (AKT)	No CBI	No PII	Photographer: Jon Jones
Valdez Marine Terminal/Ballast Water Treatment (BWT) Sludge tank			61.08458963, -146.35951232
55-gallon container of non-hazardous, diesel contaminated soil. Mislabeled as hazardous waste.			



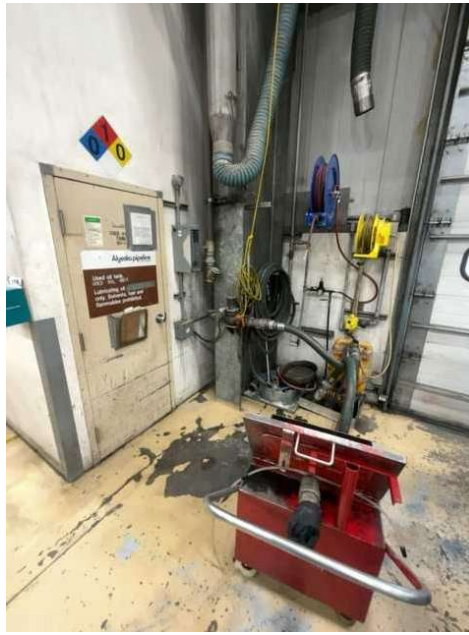
55-gal Container of Non-Hazardous Waste Label			IMG-20240806102950295098246.jpg
08/06/2024 10:29 AM (AKT)	No CBI	No PII	Photographer: Jon Jones
Valdez Marine Terminal/Ballast Water Treatment (BWT) Sludge tank			61.08458963, -146.35951232
55-gallon container of non-hazardous, diesel contaminated soil. Mislabeled as hazardous waste.			



Contaminated Soil Stockpile			IMG-202408061105015197774.jpg
08/06/2024 11:05 AM (AKT)	No CBI	No PII	Photographer: Jon Jones
Valdez Marine Terminal/Contaminated soil stockpile			61.08154551, -146.39286804
Photo of the contaminated soil stockpile that ADEC approved.			



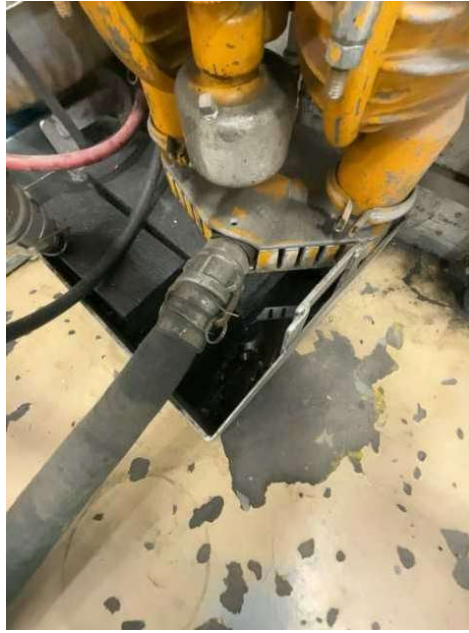
East Tank Farm, Tank 18			IMG-2024080611134513452422587.jpg
08/06/2024 11:13 AM (AKT)	No CBI	No PII	Photographer: Jon Jones
Valdez Marine Terminal/East Tank Farm			61.0815455, -146.39286804
Area of last tank clean out back in May/ June of 2023.			



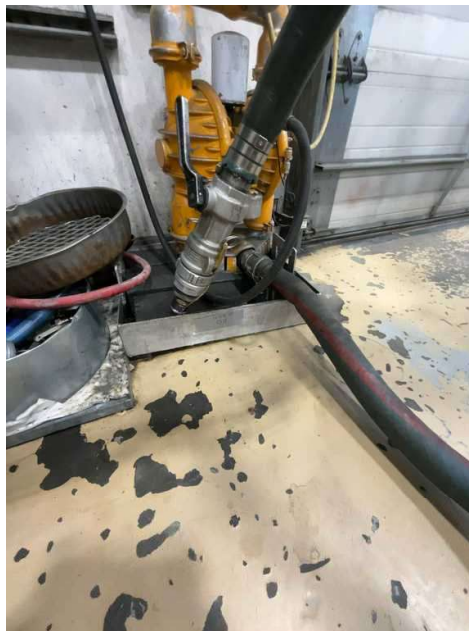
Unlabeled Catch Pan Containing Used Oil			IMG-20240806115512551293714.jpg
08/06/2024 11:55 AM (AKT)	No CBI	No PII	Photographer: Jon Jones
Valdez Marine Terminal/Equipment shop			61.08456474, -146.35956195
Pan not labeled with the words "used oil".			



Unlabeled Catch Pan Containing Used Oil			IMG-202408061155185518107964.jpg
08/06/2024 11:55 AM (AKT)	No CBI	No PII	Photographer: Jon Jones
Valdez Marine Terminal/Equipment shop			61.08456412, -146.35956421
Pan not labeled with the words "used oil".			



Unlabeled Catch Pan Containing Used Oil			IMG-20240806115523552380039.jpg
08/06/2024 11:55 AM (AKT)	No CBI	No PII	Photographer: Jon Jones
Valdez Marine Terminal/Equipment shop			61.08456698, -146.35954904
Pan not labeled with the words "used oil".			



Used Oil Pan with Label			IMG-2024080611582358231742580.jpg
08/06/2024 11:58 AM (AKT)	No CBI	No PII	Photographer: Jon Jones
Valdez Marine Terminal/Equipment shop			61.08456423, -146.35956523
Used oil label added at the time of the inspection.			



Strainer Waste Label Missing Hazard Indicator			IMG-20240806131314131485224.jpg
08/06/2024 01:13 PM (AKT)	No CBI	No PII	Photographer: Jon Jones
Valdez Marine Terminal/BWT			61.08458158, -146.35950666
55-gallon hazardous waste storage container of strainer waste was not marked with a hazard indicator for toxicity.			



Strainer Waste Label Missing Hazard Indicator			IMG-20240806131321132171008.jpg
08/06/2024 01:13 PM (AKT)	No CBI	No PII	Photographer: Jon Jones
Valdez Marine Terminal/BWT			61.08458158, -146.35950666
55-gallon hazardous waste storage container of strainer waste was not marked with a hazard indicator for toxicity.			



Strainer Waste Label with Hazard Indicator			IMG-20240806131344134469635.jpg
08/06/2024 01:13 PM (AKT)	No CBI	No PII	Photographer: Jon Jones
Valdez Marine Terminal/BWT			61.08458158, -146.35950666
55-gallon hazardous waste storage container of strainer waste now marked with a hazard indicator for toxicity.			



Waste Leather Gloves Label Missing Hazard Indicator			IMG-20240806132829282971636.jpg
08/06/2024 01:28 PM (AKT)	No CBI	No PII	Photographer: Jon Jones
Valdez Marine Terminal/Lab			61.08458975, -146.39194729
5-gallon hazardous waste storage container of leather gloves was not marked with a hazard indicator.			



Waste Leather Gloves Label Missing Hazard Indicator			IMG-20240806132837283761176.jpg
08/06/2024 01:28 PM (AKT)	No CBI	No PII	Photographer: Jon Jones
Valdez Marine Terminal/Lab			61.08458965, -146.39194742
5-gallon hazardous waste storage container of leather gloves was not marked with a hazard indicator.			



Waste Leather Gloves Label Missing Hazard Indicator			IMG-20240806132853285363158.jpg
08/06/2024 01:28 PM (AKT)	No CBI	No PII	Photographer: Jon Jones
Valdez Marine Terminal/Lab			61.08458072, -146.39152947
5-gallon hazardous waste storage container of leather gloves was not marked with a hazard indicator.			



Waste Leather Gloves Label with Hazard Indicator			IMG-20240806133322332262542.jpg
08/06/2024 01:33 PM (AKT)	No CBI	No PII	Photographer: Jon Jones
Valdez Marine Terminal/Lab			61.08458976, -146.39195025
5-gallon hazardous waste SAA container of leather gloves labeled with a hazard indicator at time of the inspection.			



BTEX and Waste Oil Labels Missing Hazard Indicators			IMG-2024080613350435498722.jpg
08/06/2024 01:35 PM (AKT)	No CBI	No PII	Photographer: Jon Jones
Valdez Marine Terminal/Lab			61.08458963, -146.39194742
2-gallon container of "BTEX" waste that was labeled "hazardous waste" but was missing a hazard indicator. 5-gallon container of "oil and grease waste" that was labeled "hazardous waste" but was missing a hazard indicator.			



BTEX and Waste Oil Labels Missing Hazard Indicators			IMG-2024080613350835860902.jpg
08/06/2024 01:35 PM (AKT)	No CBI	No PII	Photographer: Jon Jones
Valdez Marine Terminal/Lab			61.08458963, -146.39194743
2-gallon container of "BTEX" waste that was labeled "hazardous waste" but was missing a hazard indicator. 5-gallon container of "oil and grease waste" that was labeled "hazardous waste" but was missing a hazard indicator.			



Waste Oil and Grease Label Missing Hazard Indicator			IMG-20240806133513351364805.jpg
08/06/2024 01:35 PM (AKT)	No CBI	No PII	Photographer: Jon Jones
Valdez Marine Terminal/Lab			61.08458964, -146.39194745
5-gallon container of "oil and grease waste" that was labeled "hazardous waste" but was missing a hazard indicator.			



BTEX Label Missing Hazard Indicator			IMG-20240806133519351963684.jpg
08/06/2024 01:35 PM (AKT)	No CBI	No PII	Photographer: Jon Jones
Valdez Marine Terminal/Lab			61.08458964, -146.39194744
2-gallon container of "BTEX" waste that was labeled "hazardous waste" but was missing a hazard indicator.			



BTEX and Waste Oil Labels with Hazard Indicators			IMG-20240806133556355670527.jpg
08/06/2024 01:35 PM (AKT)	No CBI	No PII	Photographer: Jon Jones
Valdez Marine Terminal/Lab			61.08458964, -146.39194744
2-gallon container of "BTEX" waste that was labeled "hazardous waste" with added hazard indicator. 5-gallon container of "oil and grease waste" that was labeled "hazardous waste" with added hazard indicator. Hazard Indicators added at time of the inspection.			



Unlabeled 15-gal Container of Waste Aerosol Cans			IMG-20240806134023402373008.jpg
08/06/2024 01:40 PM (AKT)	No CBI	No PII	Photographer: Jon Jones
Valdez Marine Terminal/Emergency Response Building (ERB)			61.08458905, -146.39195369
Waste aerosol step-can in which the aerosol cans are contained was not labeled or marked clearly with any of the following phrases: "Universal Waste-Aerosol Can(s)," "Waste Aerosol Can(s)," or "Used Aerosol Can(s)."			



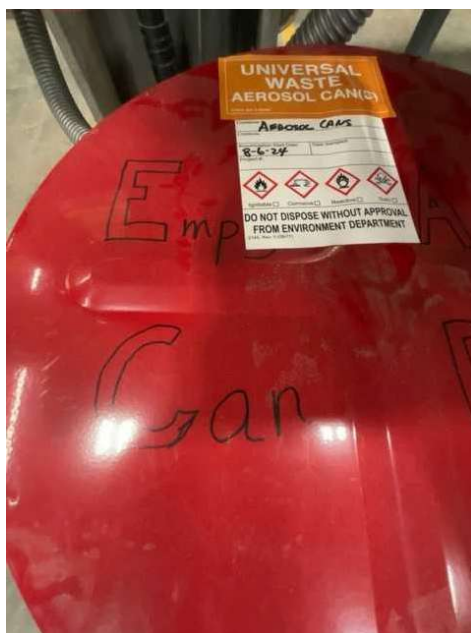
Unlabeled 15-gal Container of Waste Aerosol Cans			IMG-20240806134028402863672.jpg
08/06/2024 01:40 PM (AKT)	No CBI	No PII	Photographer: Jon Jones
Valdez Marine Terminal/Emergency Response Building (ERB)			61.0845897, -146.39194758
Top-down view of waste aerosol step-can in which the aerosol cans are contained was not labeled or marked clearly with any of the following phrases: "Universal Waste-Aerosol Can(s)," "Waste Aerosol Can(s)," or "Used Aerosol Can(s)."			



Waste Aerosol Cans in 15-gal Container			IMG-20240806134034403457606.jpg
08/06/2024 01:40 PM (AKT)	No CBI	No PII	Photographer: Jon Jones
Valdez Marine Terminal/Emergency Response Building (ERB)			61.0845897, -146.39194758
View of the waste aerosol cans in the step-can.			



Universal Waste Aerosol Cans with Label			IMG-20240806134544454472410.jpg
08/06/2024 01:45 PM (AKT)	No CBI	No PII	Photographer: Jon Jones
Valdez Marine Terminal/Emergency Response Building (ERB)			61.084589, -146.39195261
Universal Waste Label added by Dan Gilson at time of the inspection.			



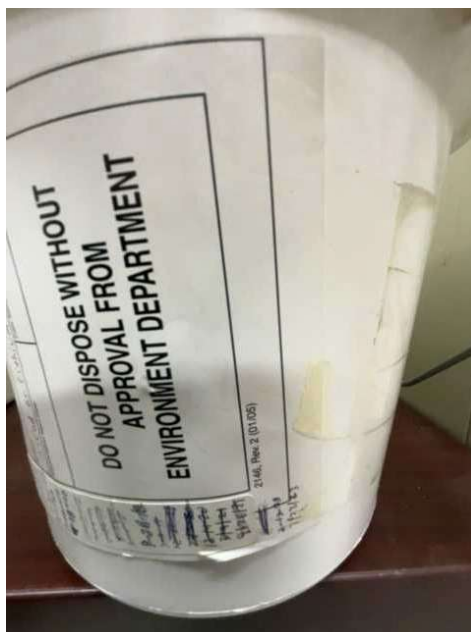
Universal Waste Aerosol Cans with Label			IMG-20240806134551455165687.jpg
08/06/2024 01:45 PM (AKT)	No CBI	No PII	Photographer: Jon Jones
Valdez Marine Terminal/Emergency Response Building (ERB)			61.084589, -146.39195261
Close-up view of Universal Waste Label added by Dan Gilson at time of the inspection.			



UW Battery container > One Year Accumulation			IMG-20240806135141514154868.jpg
08/06/2024 01:51 PM (AKT)	No CBI	No PII	Photographer: Jon Jones
Valdez Marine Terminal/Emergency Response Building (ERB)			61.08456326, -146.39081432
A small container that held two universal waste NiCad batteries has been in accumulation for greater than one year from the date the universal waste was generated on 7/23/23.			



UW Battery container > One Year Accumulation			IMG-20240806135150515060802.jpg
08/06/2024 01:51 PM (AKT)	No CBI	No PII	Photographer: Jon Jones
Valdez Marine Terminal/Emergency Response Building (ERB)			61.08456326, -146.39081432
Close-up view of container that held two universal waste NiCad batteries has been in accumulation for greater than one year from the date the universal waste was generated on 7/23/23.			



UW Battery container > One Year Accumulation			IMG-2024080613520052052010.jpg
08/06/2024 01:52 PM (AKT)	No CBI	No PII	Photographer: Jon Jones
Valdez Marine Terminal/Emergency Response Building (ERB)			61.08456326, -146.39081432
A small container that held two universal waste NiCad batteries has been in accumulation for greater than one year from the date the universal waste was generated on 7/23/23.			



Two, 5-gal Buckets of Paint			IMG-2024080614330833898491.jpg
08/06/2024 02:33 PM (AKT)	No CBI	No PII	Photographer: Jon Jones
Valdez Marine Terminal/Valdez Fabrication Facility (VFF) Shop			61.0803426, -146.36400856
View of two, 5-gallon buckets of paint that were still being utilized by the paint crew and were not waste.			



Two, 5-gal Buckets of Paint			IMG-2024080614332233222061089.jpg
08/06/2024 02:33 PM (AKT)	No CBI	No PII	Photographer: Jon Jones
Valdez Marine Terminal/Valdez Fabrication Facility (VFF) Shop			61.0803426, -146.36400856
Close-up view of two, 5-gallon buckets of paint that were still being utilized by the paint crew and were not waste.			



Pallet of Part-A Hardner			IMG-202408061443044341821535.jpg
08/06/2024 02:43 PM (AKT)	No CBI	No PII	Photographer: Jon Jones
Valdez Marine Terminal/Partner Industrial			61.0803426, -146.36400858
View of the pallet of part-A hardener.			

APPENDIX 2: DOCUMENT LOG

Document Type	Document Name	Contains CBI	Contains PII	Uploaded By	Date Received
Manifests	VMT HWR 8.28.19 012645739FLE.pdf	No	No	Jon Jones	08/06/2024
Manifests	VMT HWR 8.17.19 012645731 FLE.pdf	No	No	Jon Jones	08/06/2024
Manifests	VMT HWR 8.15.19 012645730 FLE.pdf	No	No	Jon Jones	08/06/2024
Manifests	VMT HWR 8.13.19 012645729 FLE.pdf	No	No	Jon Jones	08/06/2024
Land Disposal Restriction	141351 Crude Tank Bottoms D018.docx	No	No	Jon Jones	08/06/2024
Sampling Results	V19-079 TK8 TBP Haz Waste Char ALS Final Report 1194134.pdf	No	No	Jon Jones	08/06/2024
Waste Determinations	Profile 141351 Crude Tank Bottoms.pdf	No	No	Jon Jones	08/06/2024
Waste Determinations	V19-100 Tank 8 TBP Carbon Haz Waste Characterization ALS Final Report 1194201.pdf	No	No	Jon Jones	08/06/2024
Records Review	7.7.24 VMT WCIL DG.pdf	No	No	Jon Jones	08/06/2024
Records Review	7.14.24 VMT WCIL DG.pdf	No	No	Jon Jones	08/06/2024
Records Review	7.21.24 VMT WCIL MK.pdf	No	No	Jon Jones	08/06/2024
Records Review	7.28.24 VMT WCIL AB.pdf	No	No	Jon Jones	08/06/2024
Records Review	8.4.24 VMT WCIL AJ.pdf	No	No	Jon Jones	08/06/2024
Communications	RCRA Waste Inspection Documents Request - 8-6-24.msg	No	No	Jon Jones	08/06/2024