



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8
RESOURCE CONSERVATION AND RECOVERY ACT**

GENERAL INFORMATION

Facility Name: Yellowtail Hydroelectric Power Plant and Maintenance Facility, U.S. Bureau of Reclamation

RCRA ID: MT0142390046

Facility Location:
2 Avenue B, Fort Smith, MT
Lat/Long: 45.312363, -107.938197

Facility Contact:
Christopher Curtis, 406-666-3201,
ccurtis@usbr.gov

Notification Status:
Small Quantity Generator

Date of Inspection: September 21, 2023
Arrival Time: 10:05 a.m.
Departure Time: 4:10 p.m.

Lead Inspector & Report Author: Annette Maxwell, U.S. EPA RCRA Inspector

Inspection Attendees:

1. Linda Jacobson, U.S. EPA RCRA Inspector
2. Michelle Jefferson, U.S. Bureau of Indian Affairs (USBIA)
3. Christopher Curtis, U.S. Bureau of Reclamation (USBR)
4. Andy Yellowmule, USBR
5. Calvin Jefferson, USBR

The following facility personnel participated in portions of the inspection but did not attend the opening conference:

6. John Giberson, USBR
7. Randy Wegner, USBR

The following personnel participated in the closing conference via teleconference:

8. Cara Riwai-Couch, USBR
9. Tara Kinsey, USBR

Type and Purpose of Inspection: Compliance Evaluation Inspection
Compliance with RCRA Subtitle C

Facility Type: Hydroelectric Power Generation and Supporting Maintenance Activities

Applicable Regulations: 40 C.F.R. 260-279

Inspection Type: Unannounced Inspection
EPA inspection with USBIA accompanying

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Disclaimer

This report is a summary of observations and information gathered from the facility at the time of the inspection. The information provided does not constitute a final decision on compliance with RCRA regulations, nor is it meant to be a comprehensive summary of all activities and processes conducted at the facility.

OPENING CONFERENCE

Upon arrival at the Yellowtail Hydroelectric Power Plant and Maintenance Facility (Yellowtail), we met Mr. Wegner who instructed us to proceed across the street to the office, which is located on the second story of the National Park Service building.

Upon arrival at the office, an opening conference was conducted with the above-noted attendees. Linda Jacobson and I presented our federal inspector credentials to the facility personnel and explained the purpose of the inspection. We were not denied access to the facility and were allowed to inspect all areas that we selected for inspection.

The following information was obtained verbally during the inspection from the above-listed facility personnel unless otherwise noted.

DESCRIPTION OF INSPECTION

Regulatory Status

According to the notification status reported in RCRAInfo, Yellowtail is a small quantity generator (SQG) of hazardous waste. No hazardous waste shipments have been recorded to the RCRAInfo e-Manifest database for the three-year period preceding the inspection.

Facility and Process Description

The Yellowtail Power Plant is a hydroelectric generating station at the toe of the Yellowtail Dam. The station is located on the Bighorn River and is powered by flow of water through penstocks to turbines. Its maintenance area is located approximately 1.4 miles northeast by road. Based upon review of the Montana Cadastral (<https://svc.mt.gov/msl/mtcadastral>), the property owner of record is the USDI National Park Service, indicating that these two areas are located on land under the contiguous control of the National Park Service and, therefore, do not appear to require two separate RCRA EPA ID numbers.

The plant and maintenance area generate waste oil from equipment leaks, used turbine oil, used motor oil from vehicle maintenance, oil and solvent-contaminated rags, waste bulbs and batteries, oily sludge, spent solvent, used antifreeze, and various other wastes. Waste is primarily stored in the hazardous waste storage building located in the maintenance area. See Attachment 1 - Maps.

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The facility employs approximately 23 people, and hours of operation for the office and maintenance area are Monday through Thursday 7:00 a.m. to 5:30 p.m.

Based on area maps and EPA records, the facility is located within the exterior boundaries of the Crow Reservation and in the National Park Service's Bighorn Canyon National Recreation Area. The facility's wastewater lagoon system is located approximately ½ mile to the east of the maintenance facility area.

According to the EPA ICIS database, two related NPDES discharge permits have been issued for the site: Yellowtail Dam Wastewater Treatment Facility NPDES discharge permit MT0022993 and lagoon system NPDES discharge permit MTG589201.

Hazardous waste codes previously reported to the RCRAInfo database for wastes generated at the facility include D001 (ignitable), D002 (corrosive), D006 (cadmium), D008 (lead), D009 (mercury), D035 (methyl ethyl ketone), and F005 (spent non-halogenated solvents). Based upon review of EPA records, it appears cadmium and lead-containing wash water was generated during rotor hydro-blasting during an asbestos removal project.

TOUR INFORMATION

Mr. Curtis accompanied us site-wide during the facility tour, and other staff attended portions of the tour.

All photographs collected during the inspection and referenced below are included in Attachment 2 – Photograph Log.

Areas of the Facility included in the site tour:

- Vehicle maintenance building
- Paint storage building
- Flammable liquid storage building
- Wire storage building
- Southwest side of hazardous waste building
- Hazardous waste storage building
- Heavy equipment building
- Electric generating building at the dam
- Water discharge point immediately downstream of the electric generating building

The following narrative includes areas listed above in which conditions of interest or potential deficiencies were noted. The information included below was obtained by my observation or by explanation provided by the accompanying facility personnel unless otherwise noted.

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In a vehicle maintenance bay, used oil is accumulated in a 55-gallon drum following transfer from a collection caddy. See photo 1. I observed as the drum and caddy were marked with the words "Used Oil", though photo 1 was taken before the marking was added to the caddy.

Between the hazardous waste and wire storage buildings, I observed a black and tan drum placed outside on the ground, the tan portion of which may have once been red but become faded due to weathering. The drum had some rusting on the top. The contents were not marked on the container, but it was marked "Start Date 7-31-17" indicating that waste had begun accumulating (accumulation start date) in the container in 2017. See photos 2 and 3.

On the south side of the hazardous waste building, I observed approximately 30 55-gallon drums and a few smaller drums. See photo 4. A sign near the drums on the exterior of the hazardous waste building wall was marked "Hazardous Waste". I was not able to approach many of the drums because they were closely packed together, but I was able to determine that at least four of the drums were not empty. Mr. Curtis stated that he did not know the contents of the drums but did confirm that some of the drums were not empty. One drum was laid on its side and was bulging; I was not able to determine whether this container was empty.

Inside the hazardous waste building, drums and other containers were being stored:

- Eight drums stacked and on pallets (photos 5 and 6)
 - Two yellow metal drums marked "Aerosol cans" and "Fill Date 5-17-19" indicating the waste may have been in storage for approximately four years since the date the container became full
 - Two yellow metal salvage drums, unlabeled
 - One black and red metal drum, marked "Full 2-18-20", not marked with the contents
 - One black and red metal drum, with markings only partially legible, "... date ... -16", indicating that the start or fill date occurred in 2016
 - One black and red metal drum, with markings turned inward on the pallet and which could not be read
 - One red metal drum marked "used oil" and "Fill Date 2-18-20"
- Six drums placed on secondary containment along the north wall near the western portion of the hazardous waste building (photo 7):
 - Yellow salvage drum marked "Aerosol cans" and "start date 5-17-19"
 - Black metal drum marked "Used Solvet" and "Start Date 11/16/19"
 - Black and red metal drum marked "Used Antifreeze" and "Start Date 3-02-16" - the bung on this drum was open until Mr. Curtis closed it
 - Blue metal drum marked "Oil sludge" and "Start Date 6-4-19" - the bung on this drum was open until Mr. Curtis closed it
 - Black metal drum, unmarked - the bung on this drum was open until Mr. Curtis closed it
 - Black and red metal drum marked "Used R&O 32" and "Start Date 2-18-2020" - the bung on this drum was open until Mr. Curtis closed it
- 10 drums near the west side of the building (photo 8):

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- One red metal drum on the floor, marked “used engine oil”
- One black metal drum on a pallet, marked “oil sludge” and “fill date 8-6-19 #1”
- One blue metal drum on a pallet, bulging, marked “sludge” and “start date 6-3-19” and “fill date 6-4-19”
- One black and red metal drum on a pallet, bulging, marked “oil sludge” and “start date 3-2-16” and “fill date 6-4-19”
- One blue metal drum on the floor, bulging, marked “sludge” and “fill date 11-30-20” and “Barrel #2”
- One black metal drum on the floor, no written marking; label states “Universal Tractor Fluid” but may not represent the contents of the drum
- One black and red metal drum on the floor, marked with “start date 7-11-16” and “old/dirty fuel”
- One blue metal drum on a pallet, marked “used oil”
- Two blue metal drums on one pallet, no handwritten markings, appear new/potentially unused raw material (not waste), labeled “Regal R&O32”
- Drums, overpacks and small containers along the south wall (photos 9-10 and 13-18): some of these containers were not accessible for closer inspection due to no aisle space:
 - 9 silver drums and 9 blue drums on pallets, stacked 3-high, appeared to be unused turbine oil awaiting use (not waste)
 - 10 blue metal drums and one black metal drum on pallets, stacked two-high; one blue metal drum located under the black drum was bulging to the extent that the pallet holding the black drum was uplifted at that corner; markings on most of these 11 drums were not readable due to no aisle space affording physical access, except:
 - One blue metal drum marked “oil sludge” and “fill date 11-25-19”
 - One blue metal drum marked “start date 3-30-16” and “fill date 2-25-2020”
 - One black metal drum marked “sludge #3”
 - To the left of the pallets:
 - One blue metal drum on floor, bulging, marked “fill date 11-30-2020” and “barrel #1” and “sludge”
 - Three blue metal drums on floor, no visible markings
 - Small containers piled against the south wall, photo 15
 - Four yellow poly overpack drums, no visible markings of the contents, at least one was empty, and at least one contained asbestos fibers in a bag
 - Estimated five black metal 55-gallon drums, no visible markings of the contents
 - Estimated ten black metal 30-gallon drums, no visible markings of the contents except for one with a hazardous waste label that had been crossed out and marked “empty” on the label, and did appear to be empty
 - Two red poly drums, no visible markings of the contents
 - One black metal 30-gallon salvage drum, no visible markings of the contents, appeared to be empty
 - Three yellow metal ~55-gallon salvage drums, no visible markings of the contents

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- Yellow metal ~30-gallon salvage drums, no visible markings of the contents

In addition, spent mercury-containing light bulbs were stored in the hazardous waste storage building, see photos 10-12. Ballasts were stored in boxes on a pallet shown in photo 13.

In the northeast corner of the building, one of two metal cabinets held supplies and containers. A box sitting on top of the cabinet appeared to be saturated with oil, which had leaked down the front exterior of the cabinet on the right door. See photos 19 and 20.

Inside the power plant building, I observed a sand blast cabinet. After the inspection on 10/5/2023, Mr. Curtis provided additional information regarding sand blast waste, see Attachment 3 - Facility Correspondence. This correspondence appears to identify sand blast waste as being the material stored in the smaller yellow metal drums shown in the background of photos 9 and 16.

I also observed that sump room 101 was on a lower level and was marked as a confined space, which we did not enter. I was able to look through a passageway leading to the room, see photo 21. Below the floor grate I could see the movement of water, and Mr. Curtis explained that oil on the surface of the water is generated by leaks from various processes and is removed by skimming prior to discharge of the water to the river.

A tank located on a floor above the sump room was marked "Capacity 275 Gallons" and was described by Mr. Curtis as being used for collection of oil sludge and skimmed oil. See photo 22. The spent oil is transferred to the tank via piping from the sump after collection by the skimmer. It is later removed by connecting a flexible hose and pumping into 55-gallon drums, which are then transported to the hazardous waste storage building. Mr. Curtis stated that a second identical tank is located in sump room 101.

In the Oil Purifier Room, Mr. Curtis stated that turbine oil is filtered for reuse. Oil that meets quality specifications is reused, and that which cannot be reused is sent for disposal. I observed a storage bin marked "Used Oil Ready for Disposal" that held multiple small, approximately 5-gallon containers, some of which were marked with the words "Used Oil" and other markings. See photo 23.

CLOSING CONFERENCE

During the closing conference, I discussed concerns regarding the bulging drums, five of which were located in the hazardous waste storage building and one outside of that building, the unknown contents of additional drums located inside and outside of that same building, the lack of marking on the used oil tanks with the words "Used Oil", and the non-containerized storage of the mercury-containing light bulbs. I requested copies of used oil and e-waste disposal records and requested that the facility conduct a generator status determination. I also suggested that aisle space be arranged so that each waste drum is accessible, and that an inventory be created so that each drum's contents can be verified and referenced. We also discussed the overpack of asbestos fibers and potential worker

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training regarding wastes generated and stored onsite, considering that personnel are responsible for emergency responses.

POST-INSPECTION DOCUMENTATION RECEIVED

On October 5, 2023, Mr. Curtis provided an update by email indicating that a contractor had begun work to identify and inventory the wastes inside and outside of the hazardous waste storage building. I provided feedback to Mr. Curtis on October 6, 2023. These correspondences are included in Attachment 3.

INSPECTION FOLLOW-UP

Follow-up is needed to address the following:

1. Hazardous waste determinations for currently generated wastes
2. Generator category determination
3. Hazardous waste determinations for accumulated waste and determination of temporary generator status, if applicable
4. Storage procedures for hazardous waste based on generator category determination
5. Documentation of offsite shipment of wastes
6. Used oil tank labeling
7. Mercury-containing light bulb storage, if applicable based on generator category

Details regarding requested follow-up will be included in correspondence to the facility, as appropriate.

SIGNATURES

ANNETTE MAXWELL Digitally signed by ANNETTE MAXWELL
Date: 2023.12.07 06:52:01 -07'00'

Annette Maxwell, RCRA Inspector

JANICE PEARSON Digitally signed by JANICE PEARSON
Date: 2023.12.07 11:35:04 -07'00'

Janice A. Pearson, Manager
RCRA & OPA Enforcement Branch
Enforcement and Compliance Assurance Division

ATTACHMENT LIST

Attachment 1 – Site Map
Attachment 2 – Photo Log
Attachment 3 – Facility Correspondence

Attachment 1 - Site Map

Yellowtail Dam and Maintenance Facility – Site Overview



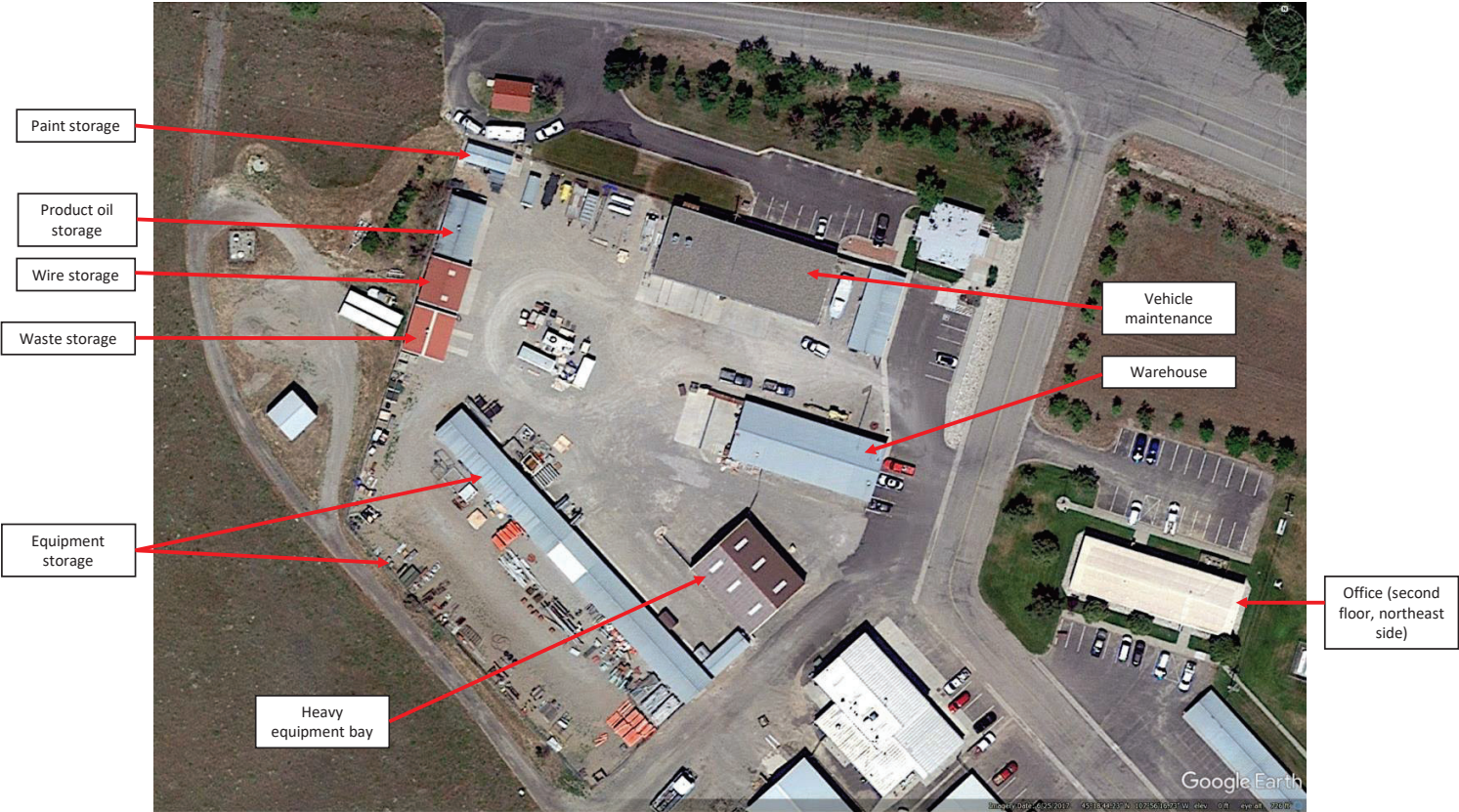
Power generation building

Maintenance Area

Lagoon

Imagery source:
Google Earth Pro

Yellowtail Dam and Maintenance Facility – Maintenance Area



Attachment 2 - Photo Log

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ATTACHMENT 1 – PHOTO LOG

Photographer: Annette Maxwell
Date of photos: 9/21/2023

Photo 1: 20230921_114032.jpg, 11:40 a.m. – photo of a drum and caddy containing used oil located in the vehicle maintenance building.



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Photo 2: 20230921_115631.jpg, 11:56 a.m. – photo of a drum located near the wire storage building. The drum was marked “start date 7-31-17”.



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Photo 3: 20230921_115638.jpg, 11:56 a.m. – close-up of the marking on the drum shown in photo 2.



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Photo 4: 20230921_120143.jpg, 12:01 p.m. – photo of outdoor drum storage located just south of the hazardous waste storage building. Some of the containers were empty, but at least four were not. Most of the drums were not reachable to try to determine whether they were empty. All but one of the containers appeared to be rusting. A hazardous waste sign is posted on the wall behind the drums. A drum on its side at the far left of the photo was bulging.



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Photo 5: 20230921_121358.jpg, 12:13 p.m. – photo of the northern portion of the interior of the hazardous waste storage building. Three bulging drums are visible in the photograph: along the far wall to center-left, one blue metal drum and one black and red metal drum, both on the same pallet, and a blue metal drum located immediately to the left of the black and red drum off of the pallet.



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Photo 6: 20230921_121422.jpg, 12:14 p.m. – photo of drums located in the hazardous waste storage building, also shown in photo 5.



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Photo 7: 20230921_122027.jpg, 12:20 p.m. – photo of drums stored on secondary containment along the northern wall inside the hazardous waste storage building, to the left of the drums shown in photo 6.



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Photo 8: 20230921_122147.jpg, 12:21 p.m. – photo of drums located near the western wall inside the hazardous waste storage building, to the left of the drums shown in photo 7. The drums in this photo are also shown in photo 5.



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Photo 9: 20230921_123614.jpg, 12:36 p.m. – photo of drums and other containers stored along the southern wall of the hazardous waste building. Photo taken facing south. One blue metal drum shown at center-right to the left of the red floor markings is bulging. At right in the photo another bulging blue metal drum stacked beneath a pallet with a black metal drum on; this bulging is pushing the pallet up.



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Photo 10: 20230921_123619.jpg, 12:36 p.m. – photo panned right from photo 9. The two bulging blue metal drums shown in photo 9 are also visible in this photo.



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Photo 11: 20230921_124023.jpg, 12:40 p.m. – close-up of light bulbs visible in photo 10.



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Photo 12: 20230921_124219.jpg, 12:42 p.m. – photo of additional light bulbs, with the bulbs shown in photo 11 visible in the background.



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Photo 13: 20230921_124240.jpg, 12:42 p.m. – photo of drums also shown in photo 10, located to the left of the light bulbs.



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Photo 14: 20230921_124850.jpg, 12:48 p.m. – additional photo of the containers on the south side of the hazardous waste building. The bulging blue metal drum is also shown in photos 9 and 10.



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Photo 15: 20230921_125037.jpg, 12:50 p.m. – photo of smaller containers located against the back wall. These containers were not accessible for closer inspection due to no aisle space.



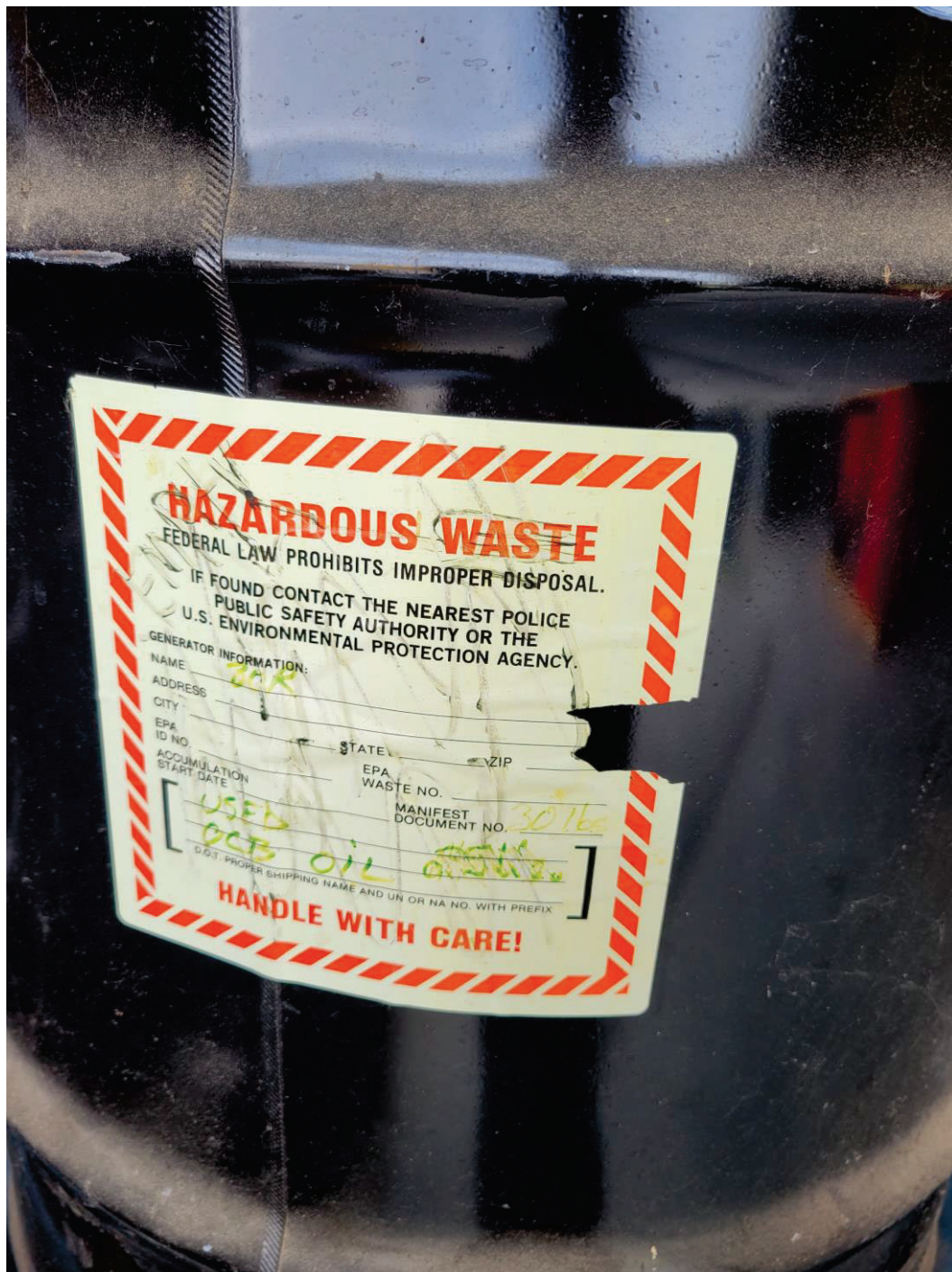
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Photo 16: 20230921_125427.jpg, 12:54 p.m. – photo of the same area as that shown in photo 9, taken facing southeast.



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Photo 17: 20230921_125504.jpg, 12:55 p.m. – photo of a hazardous waste label on a small black metal drum, visible in photo 16 atop a 55-gallon blue metal drum. The label indicates the container once held or was intended to hold hazardous waste, but the container was determined to be empty at the time of the inspection.



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Photo 18: 20230921_125508.jpg, 12:55 p.m. – photo of the same drum shown in photo 17.



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Photo 19: 20230921_130435.jpg, 1:04 p.m. – photo of a storage cabinet located along the north wall of the hazardous waste building near the eastern side.



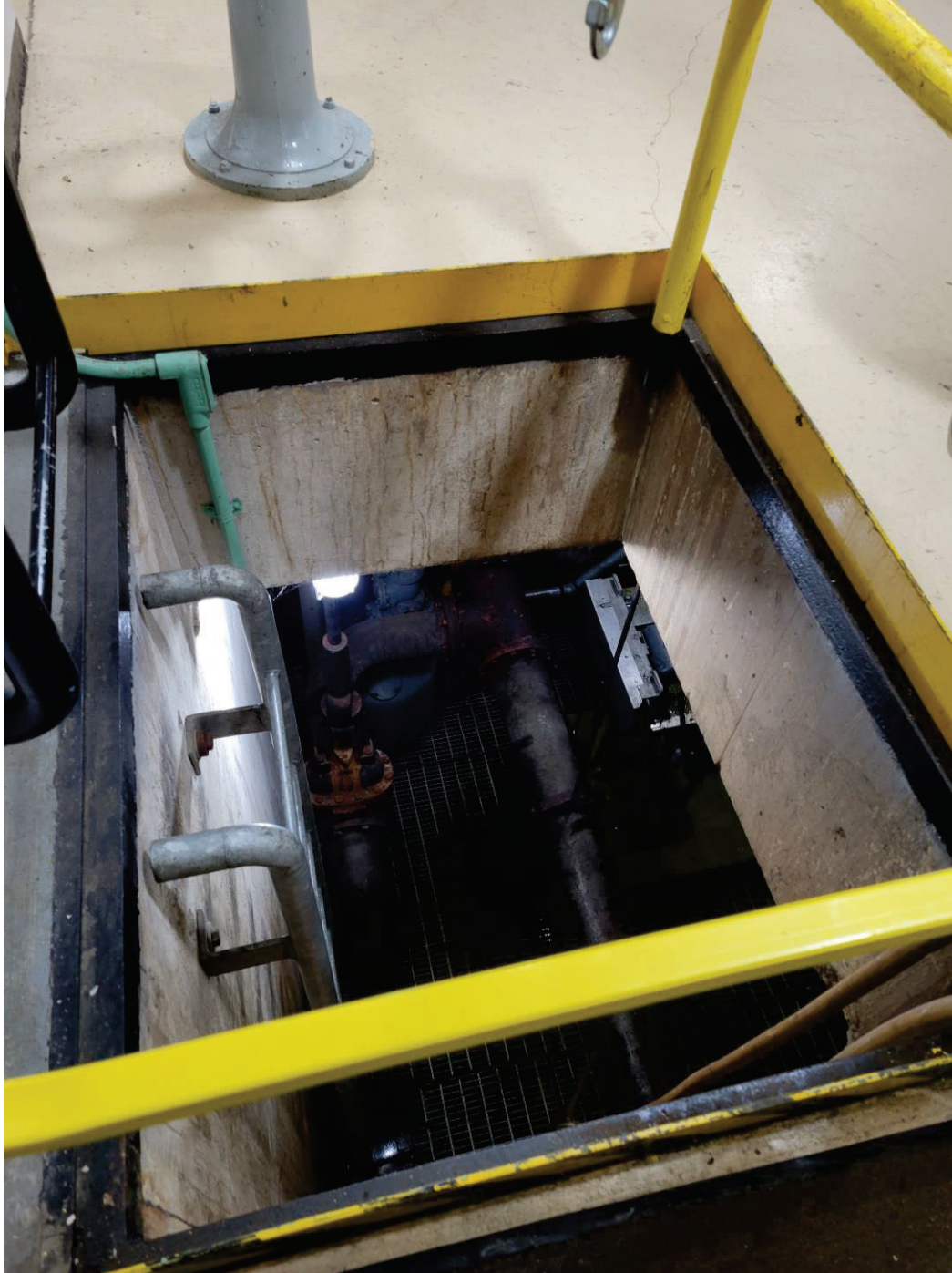
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Photo 20: 20230921_130501.jpg, 1:05 p.m. – photo of the contents of the same cabinet shown in photo 19.



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Photo 21: 20230921_142253.jpg, 2:22 p.m. – photo of sump room 1, taken from the floor above because the area is a confined space.



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Photo 22: 20230921_142610.jpg, 2:26 p.m. – photo of an oily sludge/skimings tank.



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Photo 23: 20230921_143601.jpg, 2:36 p.m. – photo of a used oil storage bin inside the plant building



Attachment 3 - Facility Correspondence

Maxwell, Annette

From: Maxwell, Annette
Sent: Friday, October 6, 2023 9:13 AM
To: Curtis, Christopher R
Cc: Riwai-Couch, Cara B
Subject: RE: Yellowtail Dam Field Division sampling question

Hello Christopher,

In regard to the bulging drums, can you provide additional information about how the determination was made that the material is oily water? Bulging drums typically indicate very high pressure within the container, and so is an indication of a dangerous situation. Please explain how the contents are known and whether it is known if the containers are pressurized. If it is not known, I urge extreme caution to avoid injury to personnel. Please ensure any contractors or personnel evaluating these drums are qualified and knowledgeable to safely determine the status and take all necessary precautions. Can you please provide the company and qualifications of the disposal contractor, and if applicable, their hazardous waste transporter EPA ID number?

You mention that the contractor conducted an inventory. Can you please provide that inventory? Does it include the drums located outdoors? For drums that were mostly empty but not totally empty, does it include all non-empty drums, and also provide a count for those that were actually empty? And does it include determinations as to which wastes are hazardous, non-hazardous, and pending analysis? All wastes must be properly characterized pursuant to 40 CFR 262.11 to ensure that the status of each waste is known before offsite shipment occurs.

Regarding the "Solvat" barrel, you mention that it is solvent. Do you have an SDS sheet for that solvent? A hazardous waste determination should be made to determine whether it is hazardous, and this may involve sampling if the specifics regarding the waste generation are not known. Please note that if the SDS sheet does not indicate that the waste would be hazardous, it is possible that its use may have added contaminants, such as metals, that could cause the waste to be hazardous under 40 CFR Part 261.

In regard to the oil/water separator located within the confined space area in the plant, can you please provide a photograph of that?

Also, can you please provide the most recent waste shipment records? This may include used oil shipments, hazardous waste manifests, pick up tickets, invoices, or other shipping documents.

As I write the inspection report, I anticipate additional items may be identified for follow-up.

Thank you for your help. I look forward to hearing from you.
Annette

From: Curtis, Christopher R <CCurtis@usbr.gov>
Sent: Thursday, October 5, 2023 1:27 PM
To: Maxwell, Annette <Maxwell.Annette@epa.gov>
Cc: Riwai-Couch, Cara B <CRIwaicouch@usbr.gov>
Subject: Yellowtail Dam Field Division sampling question

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

Good afternoon Annette,

Thank you again for visiting us. I really appreciate your insight and guidance!

We just had the disposal contractor come out and inventory our environmental storage building and the empty drums outside. The contractor also identified the contents of the barrels we had in question. The barrels labeled "sludge" are actually oily water. They said that bulged barrels are not uncommon in our region if there is water in them due to the expansion when they freeze, but that the oily water will need to be moved to non-bulged barrels for transportation. The "Solvet" Barrel is indeed Solvent. The "unlabeled" yellow 20 gallon barrels that were on the top pallet were actually labelled on their lid and are sand blasting material.

Now that we have identified the "sludge" and the cause of the bulging, we are planning to only sample the blasting sand. Is there anything else from your inspection that you would like us to sample before we sign the contract for disposal?

Thank you,
Christopher Curtis

Facility Manager
Yellowtail Field Division

P.O. Box 7551,
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Office: 406-666-3201

E-mail: ccurtis@usbr.gov