

INSPECTION REPORT

Inspection Entry Date/Time	06/26/2024 08:08 AM (AKT)	Announced: No	
Inspection Exit Date/Time	06/27/2024 03:22 PM (AKT)	Access: Granted	
Regulatory Program	Resource Conservation and Recovery Act (RCRA)		
Type of Inspection	Compliance Evaluation Inspection (CEI)		
Company Name	ConocoPhillips Alaska Inc		
Facility or Site Name	ConocoPhillips Alaska Inc - Kuparuk Oil Field		
Facility/Site Identifier	AKD991281023		
Facility/Site Physical Address	35 Miles West of Deadhorse		
City, State, Zip Code	Deadhorse, AK 99734		
County/Borough	North Slope Borough		
Generator Status	Large Quantity Generator (LQG)		
NAICS	213111		
Type of Operation	Drilling oil and gas wells on the North Slope of Alaska		
Geographic Coordinates	70.289666, -149.884468		
Mailing Address/Secondary Address	Ms. Wendy Mahan, Environmental Coordinator n1438@conocophillips.com ConocoPhillips Alaska Inc. - Kuparuk Oil Field PO Box 196105 Kuparuk Operations - NSK61 Anchorage, AK 99519		
City, State, Zip Code	Anchorage, AK 99519		
Permit Number (If Applicable)	N/A		
Lead Inspector:			
Jon Jones	Jones, Jon	Digitally signed by Jones, Jon Date: 2024.08.19 11:58:50 -08'00'	
	EPA Region 10	Jones.Jon@epa.gov	(907) 271-6329
Supervisor Review:			
Matthew Quarterman	MATTHEW QUARTERMAN	Digitally signed by MATTHEW QUARTERMAN Date: 2024.09.09 07:34:24 -07'00'	
	EPA Region 10	Quarterman.Matthew@epa.gov	(206) 553-2146

SECTION I – INTRODUCTION

Site Entry and Purpose of the Inspection

Type of inspection: CEI

EPA Region 10 Lead Inspector, Jon Jones, arrived at the ConocoPhillips Alaska Inc - Kuparuk Oil Field Facility (the “Site” or “Facility”), located at 35 Miles West of Deadhorse, Deadhorse, AK 99734, at 08:08 AM (AKT) on 06/26/2024 for an unannounced inspection. EPA Region 10 Lead Inspector presented credentials to and

informed Wendy Mahan (Environmental Coordinator) that this was an EPA Region 10 inspection to determine compliance with 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 ConocoPhillips Alaska Inc - Kuparuk Oil Field Facility representatives, observations made by the EPA REGION 10 inspector, and records and reports maintained by the facility and its HQ including, but not limited to: direct observations made by the EPA Region 10 Inspector(s), photographs taken by EPA Region 10 inspector(s), physical evidence collected by the EPA REGION 10 inspector(s), measurements or samples taken by EPA Region 10 inspector(s), verbal or written statements made by information supplied by the facility representatives during or subsequent to the on-site Inspection, and materials, processes, data, photographs, or documents shown, demonstrated, or submitted to the EPA Region 10 inspector(s) by the facility representatives during or subsequent to the on-site Inspection. In addition, information gathered prior to or subsequent to the Inspection from a review of USEPA, State, and public records may be included in this report.

Attendees

Title/Organization	Name	Phone	Email	Opening Conf.	Closing Conf.
Lead Inspector/EPA REGION 10	Jon Jones	(907) 271-6329	jones.Jon@epa.gov	Yes	Yes
RCRA Inspector-in-training/Alaska Department of Environmental Conservation (ADEC)	Vanessa Schmidt	(907) 269-4581	vanessa.schmidt@alaska.gov	Yes	Yes
Kuparuk Operations Superintendent/ConocoPhillips Alaska Inc. - Kuparuk Oil Field	Scott Collins	(907) 659-7727	n2073@conocophillips.com	No	Yes
Kuparuk HSE Supervisor/ConocoPhillips Alaska Inc. - Kuparuk Oil Field	Darren Burks	(907) 659-7220	n1023@conocophillips.com	Yes	Yes
Kuparuk Operations Superintendent/ConocoPhillips Alaska Inc. - Kuparuk Oil Field	Johnny Gannon	(907) 659-7727	n2073@conocophillips.com	Yes	No
Kuparuk HSE Director/ConocoPhillips Alaska Inc. - Kuparuk Oil Field	Tamara Hawkins	(907) 659-7590	n1153@conocophillips.com	Yes	Yes
Environmental Coordinator /ConocoPhillips Alaska Inc. - Kuparuk Oil Field	Wendy Mahan	(907) 659-0430	n1438@conocophillips.com	Yes	Yes

Opening Conference

After arriving at the facility, Vanessa Schmidt (ADEC Inspector-in-training) and I were met by Wendy Mahan (Environmental Coordinator). I presented her with my credentials, provided her with my business card, and informed her of the purpose of the inspection. She informed Darren Burks (Kuparuk HSE Supervisor), Johnny Gannon (Kuparuk Operations Superintendent), and Tamara Hawkins (Kuparuk HSE Director) of the inspection

and they joined us in the conference room. We received a quick briefing on muster points in case of an emergency as well as a briefing on needed safety gear. We then began the opening conference.

During the opening conference, Ms. Mahan informed us that there has not been much change at the facility since the last inspection in 2019. Their operations and processes continue to be that of oil and gas production; however, a “turnaround” event is currently occurring at Central Processing Facility (CPF) 1. This process is a maintenance shut down period that has a wide scope depending on the area of the facility and its condition. This process includes changing valves out at drill sites, cleaning vessels and replacing vessel components, performing internal inspections, and performing instrumentation upgrades and replacements. The waste during a turnaround is generally personal protective equipment (PPE), sandblast, sludge and slurries, tank bottoms, and aerosol cans. Ms. Mahan also informed us of the development of a new drill site (3T) and a new tank being built at CPF-2, both of which are currently in construction phases. There is also a pad expansion at 3S that is occurring. Ms. Mahan stated that ECC is their contractor for managing hazardous waste and that their last shipment of hazardous waste occurred on 6/18/24.

Ms. Mahan provided us with a list of the current satellite accumulation areas (SAAs) with waste streams, as well as waste tracking sheets for each month to evaluate generator status and a map of the field. We discussed the records we would need to review at the end of this inspection which included manifests, the contingency plan and quick reference guide, training, and weekly inspections.

We were accompanied throughout the inspection by Ms. Mahan and, for part of the first day, by Ms. Hawkins. We were not denied access to any part of the facility, and we were allowed to take photographs.

Facility/Site Information

Number of employees	280 ConocoPhillips employees/ 800-900 (on average) w/ contractors, 1,300 currently with turnaround occurring
Length of Facility at Location	The oil field was discovered in 1969 and production began in 1981. ConocoPhillips took ownership of the field in 2004.
Operating Hours	24 hours a day, 7 days a week, 365 days a year
Safety Training Provided to Inspector(s)?	No
Size of Facility	~300 square miles
What type of generator facility notified?	Large Quantity Generator (LQG)
What type of generator facility verified as?	LQG
Weather Conditions	Day 1 and Day 2— Sunny and hot

Process Description

On Alaska's North Slope, ConocoPhillips operates the Kuparuk River Unit (Kuparuk), North America's second largest oil field, 40 miles west of Prudhoe Bay. Discovered in 1969, production at Kuparuk began in 1981, increasing to a record rate of 322,000 barrels per day in 1992. Kuparuk reached a milestone in July 2005 when cumulative production reached 2 billion barrels and has produced over 2.5 billion barrels to date. The Kuparuk Field is one of the largest onshore producing fields in the United States, with more than 500 active producing wells. Rotary-drilled wells and sidetracks from existing wellbores utilizing coiled-tubing drilling are the primary

means for development drilling at Kuparuk. In 2020, ConocoPhillips' net crude oil production at Kuparuk averaged 52 MBOED. Production is processed through the Kuparuk facilities. The Kuparuk satellites consist of the Meltwater, Tabasco, Tarn and West Sak fields. In 2020, they averaged 22 MBOED of net crude oil production. All the satellite fields produce through the Kuparuk production facilities.

Waste generated at this facility include waste leather gloves, waste aerosol cans, waste paint related materials, waste solvents, waste solvent rags, universal waste lamps, and universal waste batteries. Aerosol cans are managed as universal waste; however, they are punctured when possible and any fluid recovered is managed as hazardous waste.

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. Specifically, we inspected the areas of the facility listed below.

Building(s)

Building/Area/Sub-area	Process Description	Area of Concern
1 Ball Mill MI SWACO	N/A	No
SAA	Aerosol cans, leather articles, solvent rags, lamps, batteries	No
Airport Maintenance Facility (AMF)	N/A	No
SAA	Leather articles, aerosol cans, paint related materials	No
CPF-1	N/A	Yes
C/D Warehouse Aerosol Can Popping Area	Aerosol cans, aerosol liquids	No
C/D Warehouse (Central Accumulation Area) CAA	Receives waste streams from SAAs including aerosol cans, compressed gas cylinders, aerosol liquids, leather articles, and batteries.	Yes
C/D Warehouse CGC SAA D Warehouse	Compressed gas cylinders	No
1E Pad SAA	Aerosol cans	No
Central Shops/Toolroom and Central Shops Rotating SAA	Aerosol cans, lamps, propane cylinders, leather articles, solvent rags, batteries, bulbs, H2S monitors	Yes
Temp TA SAA	PPE, sandblast, aerosol cans	No
Shipping/Receiving A/B Warehouse SAA	Batteries, H2S monitors, aerosol cans, leather articles	No
CPF- 2	N/A	No
4200 SAA	Leather articles, aerosol cans, batteries, lamps, bulbs	No
Lab SAA	Spent titration	No
Maintenance Shop SAA	Leather articles, aerosol cans, glass bead media, H2S monitors	No
CPF-3	N/A	No

Inspection Date(s):

06/26/2024 - 06/27/2024

Maintenance Shop SAA	Leather articles, aerosol cans, solvent rags, lamps, bulbs, batteries, blast media, H2S monitors	No
Doyon 25	N/A	No
Mud lab SAA	Spent reagents	No
Rig SAA	Leather gloves, lamps, batteries, aerosol cans, H2S monitors	No
Shop SAA	Leather articles, aerosol cans	No
KCC	N/A	Yes
Industrial Hygienist KO-14 SAA	Aerosol cans, compressed gas cylinders, colormetric tubes, waste methanol, oxygen sensors, dual-toxic sensors, H2S monitors	No
Rec Room Universal Waste Accumulation Area (UWAA)	Lamps, bulbs, batteries	Yes
Roads and Pads (Cathouse) SAA	Aerosol cans, leather articles, propane cylinders	No
Security Armory SAA	Aerosol cans, solvent rags, pepper balls, batteries, H2S meters	No
Carpenter Shop SAA	Leather articles, batteries, aerosol cans	No
Dock (Housekeeping) SAA	Aerosol cans, leather articles	No
KCS	N/A	No
Drilling Toolhouse SAA	Aerosol cans, leather articles, solvent rags, batteries, bulbs, H2S monitors	No
E&I Shop SAA	NO LONGER AN SAA LOCATION	No
Materials Tool Room SAA	Aerosol cans, leather articles, solvent rags, batteries, bulbs, propane cylinders	No
Pad Maintenance SAA	Lamps	No
Warehouse SAA	Leather articles, aerosol cans, batteries	No
Wireline SAA	Aerosol cans, E&P blast media, leather articles, batteries	No
KIC	N/A	Yes
Camp Maintenance SAA	Lamps, aerosol cans, adhesives, leather articles, H2S monitors, batteries, bulbs	No
Halliburton SAA	Aerosol cans, leather articles, lamps, bulbs, batteries, H2S monitors	No
Heavy Duty Truck Shop SAA	Batteries, H2S monitors, aerosol cans, bulbs, solvent rags, paint related materials, leather articles, chromium containing equipment	No
Light Duty Truck Shop SAA	Batteries, aerosol cans, leather articles, lamps, H2S monitors	No
Light Duty Truck Shop Used Oil Area Outside of Shop	Used oil	Yes
Little Red SAA	Aerosol cans, leather articles, lamps, bulbs, batteries	No

Inspection Date(s):

06/26/2024 - 06/27/2024

Valve Shop SAA	Aerosol cans, leather articles, solvent rags, used bead blast	No
Wash Bay SAA	Leather articles	No
Wells Group SAA	Leather articles, aerosol cans	No
KOC	N/A	Yes
Corrosion (D Wing) SAA	Aerosol cans, leather articles, compressed gas cylinders, batteries, H2S monitors	Yes
Gas Station SAA	Absorbents/ rags with gasoline	No
Industrial Hygiene SAA	Compressed gas cylinders, oxygen sensors, dual-toxic sensors	No
Kakivik Connex A (Coupon Crew) SAA	Aerosol cans, leather articles, batteries	No
Kitchen SAA	Aerosol cans	No
Lab (KLS) SAA	Aerosol cans, leather articles, solvent rags, spent solvents, lead weights, aqueous solution pH<2, T.A.V. waste pH<1, aqueous solution with metals	No
Medical Clinic SAA	Aerosol cans, compressed gas cylinders, hazardous waste pharmaceuticals, batteries	No
Spill Response (KSRC) SAA	Aerosol cans, leather articles, solvent rags, lamps, bulbs	No
Telecom Network Services SAA	Aerosol cans, leather articles, batteries	No
3rd Floor UWAA	Lamps, batteries, bulbs	No
Bus Barn SAA	Aerosol cans	No
Hallway UWAA	Lamps, bulbs	No
Nabors 7ES	N/A	Yes
Mezzanine SAA	Aerosol cans, leather articles, lamps, H2S monitors, batteries	No
Mud Lab SAA	Spent reagents	Yes
Shop SAA	Aerosol cans, batteries	No
Nordic 3	N/A	Yes
Mud lab SAA	Spent reagents	No
Rig SAA	Aerosol cans, leather articles, bulbs, batteries	No
Used Oil Collection Area Just Outside of Rig	Used oil	Yes
Seater Treatment Plant (STP)	N/A	No
SAA	Aerosol cans, leather articles, solvent rags, lamps, batteries, H2S monitors	No

SECTION II – OBSERVATIONS**Building:** KIC/ Light Duty Shop/Used oil tank outside shop**Observation #:** JJ1-OB-007**Date:** 06/26/2024**Contains AOC:** Yes**Contains CBI:** No**Person Interviewed:** Wendy Mahan**Title:** Environmental Coordinator

At the time of the inspection, we observed a used oil storage tank inside of a shed. On one side of the shed it was labeled as "waste oil". The tank and the rest of the shed were labeled "used oil". Personnel in the area were told to paint over the words "waste oil" and they stated that they would.

Building: KIC/ Little Red/ SAA

Observation #: JJ1-OB-012 **Date:** 06/26/2024 **Contains AOC:** No **Contains CBI:** No

Person Interviewed: Wendy Mahan **Title:** Environmental Coordinator

At the time of the inspection, we observed a container of waste lamps that was properly labeled with the words "used lamps" but did not have an accumulation start date. While labeling containers with an accumulation start date is an internal protocol, Ms. Mahan was able to determine an accumulation start date based on the waste log associated with the container in the SAA. This date was within a year and Ms. Mahan labeled the container with the date "5/24/24".

Photo(s)

1. [IMG-20240626115020502063286.jpg](#)
2. [IMG-20240626115028502845429.jpg](#)
3. [IMG-20240626115122512272188.jpg](#)
4. [IMG-20240626115648564874348.jpg](#)
5. [IMG-20240626115654565458500.jpg](#)

Building: CPF-1/ C/D Warehouse/ CAA

Observation #: JJ1-OB-015 **Date:** 06/26/2024 **Contains AOC:** Yes **Contains CBI:** No

Person Interviewed: Wendy **Title:**

Ms. Mahan stated that the facility had a shipment of hazardous waste go out on 6/18/24 and therefore not much waste was present on site in the CAA at the time of the inspection. She stated that she believed universal waste had also been shipped out recently.

At the time of the inspection, we observed one 55- gallon poly drum pending analysis. This drum was labeled both with a "hazardous waste" label and a "non-hazardous waste" label. It was not marked with a hazard indicator. Ms. Mahan stated that she would have CAA personnel add a hazard indicator.

At the time of the inspection, we observed one 5-gal white bucket labeled "hazardous waste". It was not marked with a hazard indicator. Ms. Mahan labeled this container with a hazard indicator during the inspection.

At the time of the inspection, we observed a small box of universal waste lithium batteries that was not closed properly because it contained too many batteries. Ms. Mahan stated that she would repackage this container.

At the time of the inspection, we observed a large crate of waste leather gloves not labeled "hazardous waste", nor marked with a hazard indicator. However, two bags inside the box were labeled appropriately. Ms. Mahan stated that she would have CAA personnel label the crate with the words "hazardous waste" and with a hazard indicator.

At the time of the inspection, we observed three drums on an upper shelf with labels that were difficult to read. Ms. Mahan stated that she did not believe these drums to contain hazardous waste. She stated that they were being held for analysis and she would inform us of the results when she received them. I recommended

Inspection Date(s):

06/26/2024 - 06/27/2024

that Ms. Mahan consider making the hazardous waste label larger as it is difficult to see information like the hazard indicator, specifically when a container is elevated on a shelf such as these.

In an email received from Ms. Mahan after the inspection, photos were provided addressing areas of concern identified during the inspection. This included: labeling the crate of hazardous waste gloves with a hazardous waste label and a hazard indicator, repackaging the box of lithium batteries to ensure the container was closed, and labeling the appropriate containers as "non-hazardous" after receiving confirmation from analyses. In relation to these drums, she stated that the contents were found to be blast media, glycol A, and glycol B.

Photo(s)

1. [IMG-2024062613061361372998.jpg](#)
2. [IMG-202406261306286282000440.jpg](#)
3. [IMG-2024062613082082077307.jpg](#)
4. [IMG-2024062613082582570523.jpg](#)
5. [IMG-2024062613093093072478.jpg](#)
6. [IMG-2024062613125812581982146.jpg](#)
7. [IMG-2024062613160916978155.jpg](#)
8. [IMG-20240626131617161778743.jpg](#)
9. [IMG-20240626131623162371356.jpg](#)
10. [IMG-20240626132021202176882.jpg](#)
11. [IMG-20240626132038203858901.jpg](#)
12. [IMG-20240626132049204962767.jpg](#)

Building: KOC/ Medical Clinic/ SAA**Observation #:** JJ1-OB-030**Date:** 06/27/2024**Contains AOC:** No**Contains CBI:** No**Person Interviewed:** Wendy Mahan**Title:** Environmental Coordinator

This SAA is where hazardous waste pharmaceuticals are handled. Clinic personnel stated that hazardous waste pharmaceuticals generated in the clinic are managed as hazardous waste. Non-hazardous waste pharmaceuticals that are expired are donated to a clinic in Anchorage to be re-used. This clinic does utilize a reverse distributor for any potentially creditable pharmaceuticals.

Photo(s)

1. [IMG-20240627081713171381632.jpg](#)
2. [IMG-20240627081720172067362.jpg](#)
3. [IMG-20240627081726172664934.jpg](#)
4. [IMG-2024062708200020058022.jpg](#)
5. [IMG-20240627082011201151273.jpg](#)
6. [IMG-20240627082020202068971.jpg](#)

Building: KCC/ Rec Room UWAA/ SAA**Observation #:** JJ1-OB-034**Date:** 06/27/2024**Contains AOC:** Yes**Contains CBI:** No**Person Interviewed:** Wendy Mahan**Title:** Environmental Coordinator

At the time of the inspection, we observed a broken bulb in a trash can. Ms. Mahan was unsure if this bulb was hazardous or non-hazardous. She removed the bulb from the trash can and placed it into the appropriate universal waste container. She stated that she would determine the kind of bulb it was to determine if hazardous or non-hazardous.

In an email received from Ms. Mahan after the inspection, she stated that the bulb was a non-hazardous Sylvania brand 250-watt incandescent heat lamp. She provided a photo of this label and the Safety Data Sheet, as well as a photo of the stamp inside the bulb itself.

Photo(s)

1. [IMG-2024062708470547583203.jpg](#)

Building: KOC/ Corrosion (D Wing)/ SAA

Observation #: JJ1-OB-039 **Date:** 06/27/2024 **Contains AOC:** Yes **Contains CBI:** No

Person Interviewed: Wendy Mahan **Title:** Environmental Coordinator

At the time of the inspection, we observed a container of waste leather gloves that was not closed. This container was labeled appropriately with the words "hazardous waste" and a hazard indicator. Ms. Mahan closed this container during the inspection.

At the time of the inspection, we also observed a container of waste aerosol cans that was properly labeled as universal waste but did not have an accumulation start date. While labeling containers with an accumulation start date is an internal protocol, Ms. Mahan was able to determine a start date based on the waste log associated with the container in the SAA. This date was within a year and Ms. Mahan labeled the container with the appropriate date.

Photo(s)

1. [IMG-20240627091145114580099.jpg](#)
2. [IMG-20240627091149114970939.jpg](#)
3. [IMG-20240627091154115474025.jpg](#)
4. [IMG-20240627091715171577551.jpg](#)

Building: CPF1/ Central Shops/Toolroom and Central Shops Rotating/ SAA

Observation #: JJ1-OB-040 **Date:** 06/27/2024 **Contains AOC:** Yes **Contains CBI:** No

Person Interviewed: Wendy Mahan **Title:** Environmental Coordinator

At the time of the inspection, we observed two containers of compressed gas cylinders that were labeled with the words "hazardous waste" but were not marked with a hazard indicator. Ms. Mahan asked shop personnel to label these containers with the correct hazard indicator.

Photo(s)

1. [IMG-202406270926032631177197.jpg](#)
2. [IMG-20240627092615261545873.jpg](#)

Building: Nabors 7ES/ Mud Lab/ SAA

Observation #: JJ1-OB-044 **Date:** 06/27/2024 **Contains AOC:** Yes **Contains CBI:** No

Inspection Date(s):

06/26/2024 - 06/27/2024

Person Interviewed: Wendy Mahan	Title: Environmental Coordinator
At the time of the inspection, we observed a container of spent mud lab reagents that was labeled with the words "hazardous waste" but was not labeled with a hazard indicator. Ms. Mahan labeled this with the hazard indicator "toxic" and stated that she would ensure that there were no other appropriate indicators that need to be added. In an email received from Ms. Mahan after the inspection, photos were provided demonstrating that the container of spent mud lab reagents had been labeled with the hazard indicators "toxic" and "ignitable".	
Photo(s) 1. IMG-20240627101651165176996.jpg 2. IMG-2024062710170317358498.jpg	

Building: Nordic 3/ Rig/ Used oil collection area just outside rig			
Observation #: JJ1-OB-055	Date: 06/27/2024	Contains AOC: Yes	Contains CBI: No
Person Interviewed: Wendy Mahan		Title: Environmental Coordinator	
At the time of the inspection, we observed two 300-gallon tanks of used oil outside of the rig labeled "waste oil". The containment device holding these two tanks was labeled "used oil". Ms. Mahan stated that these tanks would be re-labeled with the words "used oil". At the time of the inspection, we observed a container of waste lamps in the SAA in the rig that did not have an accumulation start date. While labeling containers with an accumulation start date is an internal protocol, Ms. Mahan was able to determine a start date based on the waste log associated with the container in the SAA. This date was within a year and Ms. Mahan labeled the container with the date "5/16/24".			
Photo(s) 1. IMG-20240627121654165499271.jpg 2. IMG-20240627121703173109086.jpg			

SECTION III – RECORDS REVIEW

Record: Inspections		AOC: Yes
Ref #: JJ1-RR-001	Reviewed By: Jon Jones	Reviewed Date: 06/26/2024
At the time of the inspection, three years (2021-2024) of weekly inspections of the CAA were reviewed. There was found to be no record of inspection conducted for the week of 9/3/23-9/9/23. Jamie Allmond and his alternate, Corina Hasler (Hazardous Waste Specialists), conduct these inspections and state that the week when the inspection was not conducted was during a transitional period when staff changes were occurring.		
Photo(s) 1. IMG-202406261342004202204599.jpg		
Record: Exception Reports		AOC: Yes
Ref #: JJ1-RR-002	Reviewed By: Jon Jones	Reviewed Date: 06/27/2024

At the time of the inspection, three years (2021-2024) of hazardous waste manifests were reviewed. During this review, we did not find an exception report for manifest #004898398FLE. For this manifest, the date of shipment was 10/15/23 and the treatment, storage, and disposal facility (TSDF) received and dated the manifest 46 days later on 12/1/23.

Ms. Mahan stated that she believed this to be an error because the transporter, Republic Services, informed her that this shipment would arrive on time when she inquired prior. She stated that the facility's procedure is to contact the transporter if a certain number of days is hit before receiving back a manifest. If it is determined that this time frame for return will be over 45 days, an exception report is submitted. She stated that she reached out to Republic Services when she had not received this specific manifest and was told that it would be within the appropriate time frame, therefore, she did not request an exception report. She stated that she would investigate this further with Republic Services.

SECTION IV – AREA OF CONCERN

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

Building: C/D Warehouse	Area: CAA	Sub-area:
JJ1-OB-015		
One 55- gallon poly drum labeled as "hazardous waste" pending analysis, not marked with a hazard indicator.	Regulation:	Sections:
Building: C/D Warehouse	Area: CAA	Sub-area:
JJ1-OB-015		
One 5-gallon white bucket labeled "hazardous waste", not marked with a hazard indicator.	Regulation:	Sections:
Building: C/D Warehouse	Area: CAA	Sub-area:
JJ1-OB-015		
One small box of universal waste lithium batteries not closed due to box containing too many batteries.	Regulation:	Sections:
Building: C/D Warehouse	Area: CAA	Sub-area:
JJ1-OB-015		
One large crate of waste leather gloves, not labeled hazardous waste nor marked with a hazard indicator.	Regulation:	Sections:
Building: KCC Rec Room UWAA	Area: SAA	Sub-area:
JJ1-OB-034		

Inspection Date(s):

06/26/2024 - 06/27/2024

One broken bulb observed in a trash can.	Regulation:	Sections:
Building: KOC Corrosion (D Wing)	Area: SAA	Sub-area:
JJ1-OB-039		
One container of waste leather gloves, not closed.	Regulation:	Sections:
Building: Central Processing Facility (CPF) 1	Area: Central Shops/Toolroom and Central Shops Rotating	Sub-area:
JJ1-OB-040		
Two containers of waste compressed gas cylinders, not marked with hazard indicators.	Regulation:	Sections:
Building: Nabors 7ES	Area: Mud Lab	Sub-area: SAA
JJ1-OB-044		
One container of spent mud lab reagents, not marked with a hazard indicator.	Regulation:	Sections:
Building: Nordic 3 Rig	Area: Used oil collection area just outside rig	Sub-area:
JJ1-OB-055		
Two 300-gal tanks labeled "waste oil".	Regulation:	Sections:
Building: KIC Light Duty Shop	Area: Used oil tank outside shop	Sub-area:
JJ1-OB-007		
A used oil storage tank inside of a shed that is labeled "waste oil".	Regulation:	Sections:

Record: Inspections**JJ1-RR-001**

Missing inspection for the week of 9/3/23-9/9/23.

Regulation:**Sections:****Record:** Exception Reports**JJ1-RR-002**

Inspection Date(s):

06/26/2024 - 06/27/2024

Missing an exception report for manifest #004898398FLE. At the time of the inspection, the date of shipment was 10/15/23 and the TSDf received and dated the manifest 46 days later on 12/1/23.	Regulation:	Sections:
---	--------------------	------------------

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

Following the review of paperwork, I held a closing conference to discuss the findings of my inspection. This was attended by Wendy Mahan (Environmental Coordinator), Darren Burks (Kuparuk HSE Supervisor), Scott Collins (Kuparuk Operations Superintendent), and Tamara Hawkins (Kuparuk HSE Director). I reiterated that the purpose of the inspection was to perform a routine hazardous waste compliance inspection and I thanked the facility staff for their time and cooperation. I reviewed areas of concern that were identified during the inspection. This included:

- Several hazardous waste containers missing hazard indicators
- Used oil receptacles being labeled “waste oil”
- Containers containing hazardous waste not being properly closed
- A broken bulb found in a trash can
- A missing weekly inspection
- A missing exception report

Areas of concern that were addressed during the inspection were also noted. This included:

- Adding hazard indicators to hazardous waste containers
- Closing containers containing hazardous waste
- Removing the broken bulb from the trash can and into the appropriate satellite container

The ability to address the remaining areas of concern and send photos was also discussed. I answered any questions they had and explained the follow up process including the receipt of the report and the possibility of enforcement.

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



Little Red SAA UW Lamps Container			IMG-20240626115020502063286.jpg
06/26/2024 11:50 AM (AKT)	No CBI	No PII	Photographer: Jon Jones
KIC Little Red/SAA			N/A
Container of waste lamps- no AOC.			



Little Red SAA UW Lamps Container			IMG-20240626115028502845429.jpg
06/26/2024 11:50 AM (AKT)	No CBI	No PII	Photographer: Jon Jones
KIC Little Red/SAA			N/A
Bulb inside waste lamp container- no AOC.			

Inspection Date(s):

06/26/2024 - 06/27/2024



Little Red SAA UW Lamps Container			IMG-20240626115122512272188.jpg
06/26/2024 11:51 AM (AKT)	No CBI	No PII	Photographer: Jon Jones
KIC Little Red/SAA			N/A
Container of waste lamps with "UW Used Lamps" label- no AOC.			



Little Red SAA UW Lamps Container			IMG-20240626115648564874348.jpg
06/26/2024 11:56 AM (AKT)	No CBI	No PII	Photographer: Jon Jones
KIC Little Red/SAA			N/A
Container of waste lamps- no AOC.			

Inspection Date(s):

06/26/2024 - 06/27/2024



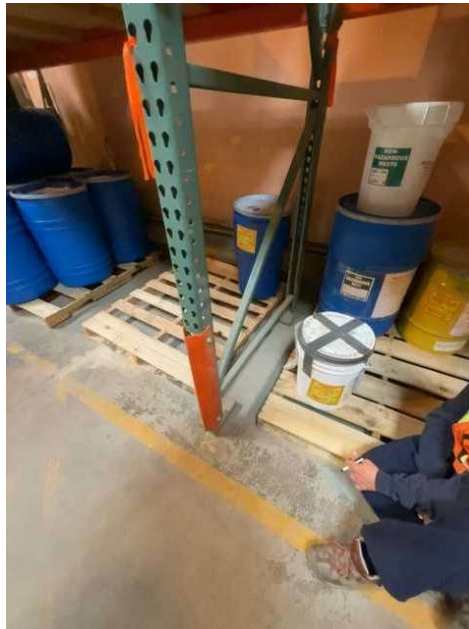
Little Red SAA UW Lamps Container			IMG-20240626115654565458500.jpg
06/26/2024 11:56 AM (AKT)	No CBI	No PII	Photographer: Jon Jones
KIC Little Red/SAA			N/A
Container of waste lamps with date added- no AOC.			



55-Gallon Poly Container in CAA Pending Analysis			IMG-2024062613061361372998.jpg
06/26/2024 01:06 PM (AKT)	No CBI	No PII	Photographer: Jon Jones
C/D Warehouse/CAA			70.32514905, -149.60603558
One 55-gallon poly pending analysis and marked "hazardous waste", not marked with a hazard indicator.			



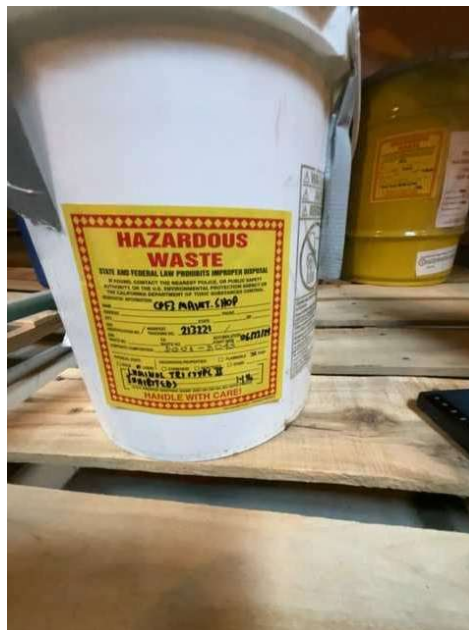
55-Gallon Poly Container in CAA Pending Analysis			IMG-202406261306286282000440.jpg
06/26/2024 01:06 PM (AKT)	No CBI	No PII	Photographer: Jon Jones
C/D Warehouse/CAA			70.32514872, -149.60603582
One 55-gallon poly pending analysis and marked "hazardous waste", not marked with a hazard indicator.			



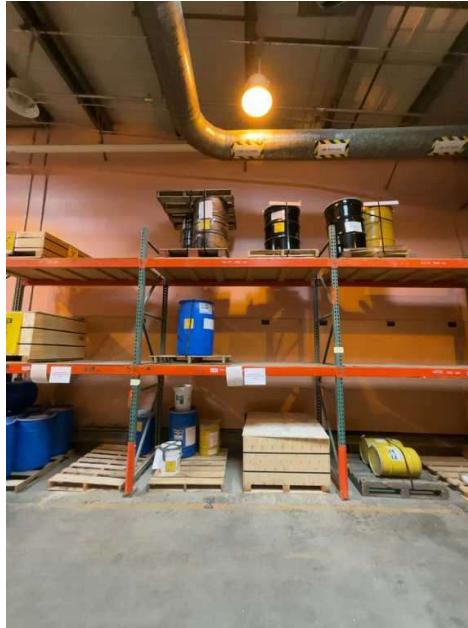
5-Gallon Bucket in CAA without a Hazard Indicator			IMG-2024062613082082077307.jpg
06/26/2024 01:08 PM (AKT)	No CBI	No PII	Photographer: Jon Jones
C/D Warehouse/CAA			70.3251482, -149.60603622
One 5-gallon white bucket labeled "hazardous waste", not marked with a hazard indicator.			



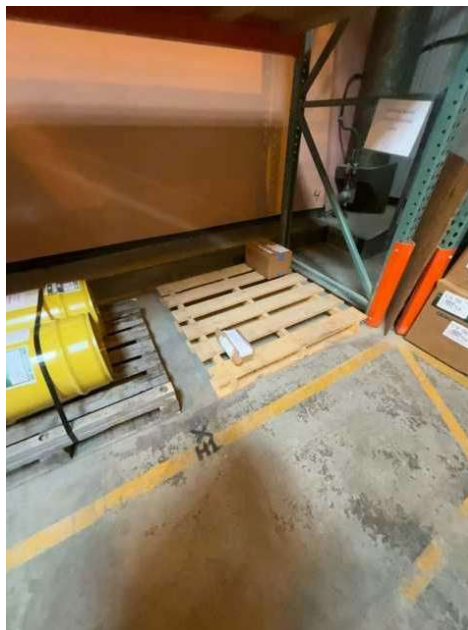
5-Gallon Bucket in CAA without a Hazard Indicator			IMG-2024062613082582570523.jpg
06/26/2024 01:08 PM (AKT)	No CBI	No PII	Photographer: Jon Jones
C/D Warehouse/CAA			70.32514934, -149.60603536
One 5-gallon white bucket labeled "hazardous waste", not marked with a hazard indicator.			



5-Gallon Bucket in CAA without a Hazard Indicator			IMG-2024062613093093072478.jpg
06/26/2024 01:09 PM (AKT)	No CBI	No PII	Photographer: Jon Jones
C/D Warehouse/CAA			70.32514934, -149.60603536
One 5-gallon white bucket labeled "hazardous waste" and marked with a hazard indicator.			



CAA Overview			IMG-2024062613125812581982146.jpg
06/26/2024 01:12 PM (AKT)	No CBI	No PII	Photographer: Jon Jones
C/D Warehouse/CAA			70.32515, -149.60603486
Overview of CAA and waste present at the time of the inspection.			



Box of Lithium Batteries in CAA not Closed			IMG-2024062613160916978155.jpg
06/26/2024 01:16 PM (AKT)	No CBI	No PII	Photographer: Jon Jones
C/D Warehouse/CAA			70.32514954, -149.60603521
One small box of UW lithium batteries that is not closed.			

Inspection Date(s):

06/26/2024 - 06/27/2024



Box of Lithium Batteries in CAA not Closed			IMG-20240626131617161778743.jpg
06/26/2024 01:16 PM (AKT)	No CBI	No PII	Photographer: Jon Jones
C/D Warehouse/CAA			70.32515003, -149.60603484
One small box of UW lithium batteries that is not closed.			



Box of Lithium Batteries in CAA not Closed			IMG-20240626131623162371356.jpg
06/26/2024 01:16 PM (AKT)	No CBI	No PII	Photographer: Jon Jones
C/D Warehouse/CAA			70.32514748, -149.60603675
One small box of UW lithium batteries that is not closed.			



Crate of Waste Leather Gloves in CAA not Labeled Hazardous Waste or Marked with a Hazard Indicator			IMG-20240626132021202176882.jpg
06/26/2024 01:20 PM (AKT)	No CBI	No PII	Photographer: Jon Jones
C/D Warehouse/CAA			70.32517244, -149.60601804
One large crate of waste leather gloves that is not labeled "hazardous waste" and is not marked with a hazard indicator.			



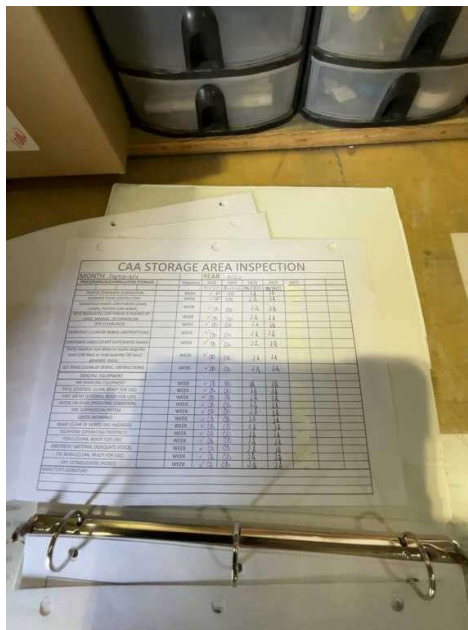
Crate of Waste Leather Gloves in CAA not Labeled Hazardous Waste or Marked with a Hazard Indicator			IMG-20240626132038203858901.jpg
06/26/2024 01:20 PM (AKT)	No CBI	No PII	Photographer: Jon Jones
C/D Warehouse/CAA			70.32517242, -149.60601805
Two bags of waste leather gloves inside of an unlabeled crate. Bags are labeled as "hazardous waste" and with hazard indicators.			

Inspection Date(s):

06/26/2024 - 06/27/2024



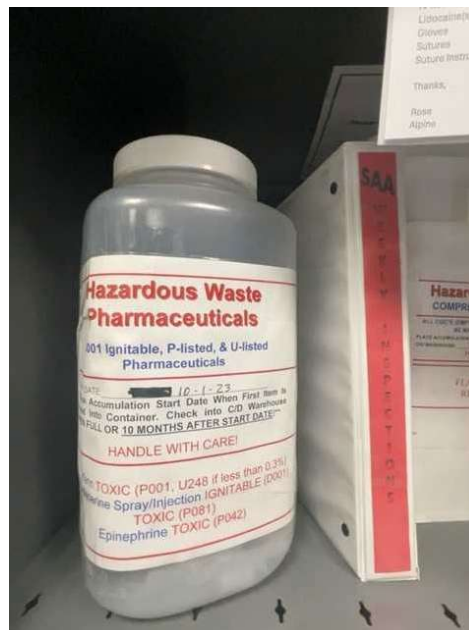
Crate of Waste Leather Gloves in CAA not Labeled Hazardous Waste or Marked with a Hazard Indicator			IMG-20240626132049204962767.jpg
06/26/2024 01:20 PM (AKT)	No CBI	No PII	Photographer: Jon Jones
C/D Warehouse/CAA			70.32515023, -149.60603469
Two bags of waste leather gloves inside of an unlabeled crate. Bags are labeled as "hazardous waste" and with hazard indicators.			



Weekly Inspection Log for CAA			IMG-202406261342004202204599.jpg
06/26/2024 01:42 PM (AKT)	No CBI	No PII	Photographer: Jon Jones
[Building/Area]			70.32511169, -149.6060636
No inspection was conducted during the week of 9/3/23 thru 9/9/23.			



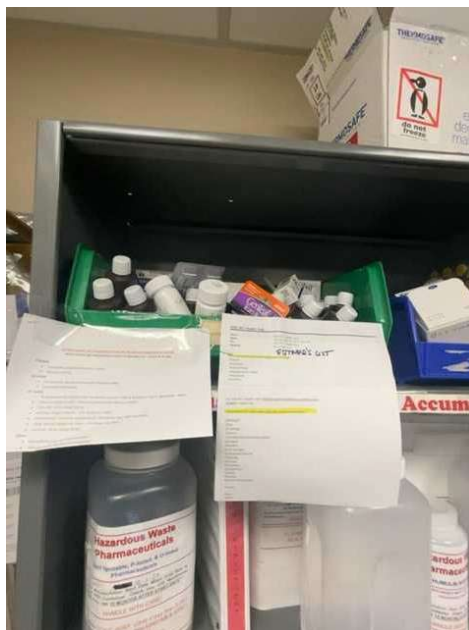
Hazardous Waste Pharmaceuticals in Medical Clinic SAA			IMG-20240627081713171381632.jpg
06/27/2024 08:17 AM (AKT)	No CBI	No PII	Photographer: Jon Jones
KOC Medical Clinic/SAA			70.32510136, -149.610406
Medical Clinic SAA overview.			



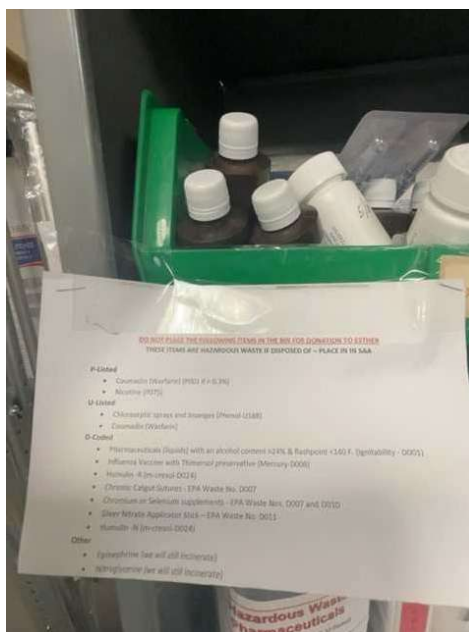
Hazardous Waste Pharmaceuticals in Medical Clinic SAA			IMG-20240627081720172067362.jpg
06/27/2024 08:17 AM (AKT)	No CBI	No PII	Photographer: Jon Jones
KOC Medical Clinic/SAA			70.32510075, -149.6103541
Hazardous waste pharmaceuticals container.			

Inspection Date(s):

06/26/2024 - 06/27/2024



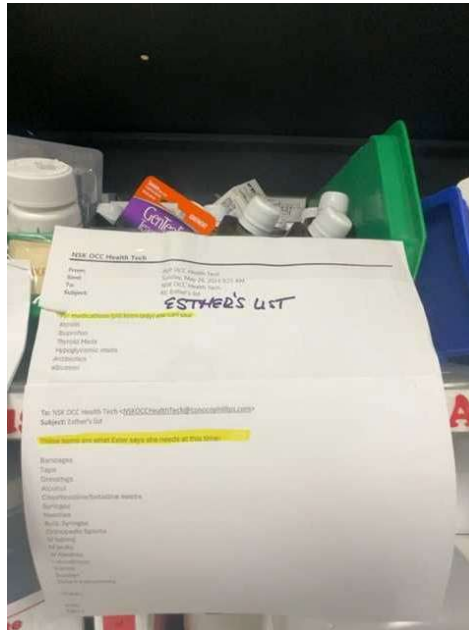
Hazardous Waste Pharmaceuticals in Medical Clinic SAA			IMG-20240627081726172664934.jpg
06/27/2024 08:17 AM (AKT)	No CBI	No PII	Photographer: Jon Jones
KOC Medical Clinic/SAA			70.32510697, -149.61038169
Non-hazardous waste pharmaceuticals to be sent to Anchorage for re-use.			



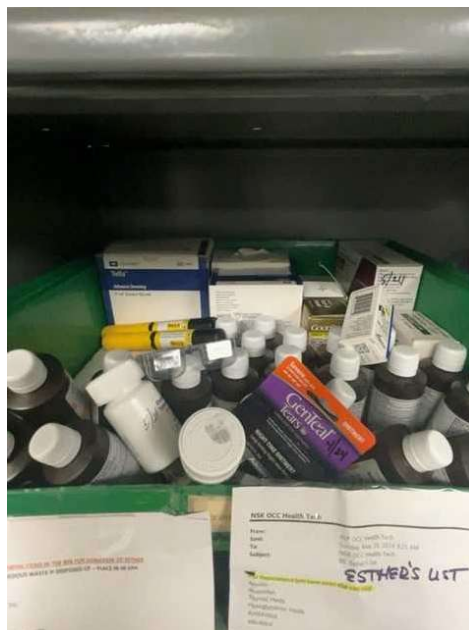
Hazardous Waste Pharmaceuticals in Medical Clinic SAA			IMG-2024062708200020058022.jpg
06/27/2024 08:20 AM (AKT)	No CBI	No PII	Photographer: Jon Jones
KOC Medical Clinic/SAA			70.32510572, -149.61038662
Non-hazardous waste pharmaceuticals to be sent to Anchorage for re-use.			

Inspection Date(s):

06/26/2024 - 06/27/2024



Hazardous Waste Pharmaceuticals in Medical Clinic SAA			IMG-20240627082011201151273.jpg
06/27/2024 08:20 AM (AKT)	No CBI	No PII	Photographer: Jon Jones
KOC Medical Clinic/SAA			70.32510572, -149.61038403
Non-hazardous waste pharmaceuticals to be sent to Anchorage for re-use.			



Hazardous Waste Pharmaceuticals in Medical Clinic SAA			IMG-20240627082020202068971.jpg
06/27/2024 08:20 AM (AKT)	No CBI	No PII	Photographer: Jon Jones
KOC Medical Clinic/SAA			70.32510805, -149.61040212
Non-hazardous waste pharmaceuticals to be sent to Anchorage for re-use.			



Broken Lamp in Trash in KCC Rec Room SAA			IMG-2024062708470547583203.jpg
06/27/2024 08:47 AM (AKT)	No CBI	No PII	Photographer: Jon Jones
KCC Rec Room UWAA/SAA			70.32528935, -149.60944402
One broken lamp found in a trash can.			



Waste Leather Glove Container not Closed in KOC Corrosion SAA			IMG-20240627091145114580099.jpg
06/27/2024 09:11 AM (AKT)	No CBI	No PII	Photographer: Jon Jones
KOC Corrosion (D Wing)/SAA			70.32547288, -149.61261297
One container of waste leather gloves that is not closed.			

Inspection Date(s):

06/26/2024 - 06/27/2024



Waste Leather Glove Container not Closed in KOC Corrosion SAA			IMG-20240627091149114970939.jpg
06/27/2024 09:11 AM (AKT)	No CBI	No PII	Photographer: Jon Jones
KOC Corrosion (D Wing)/SAA			70.32547288, -149.61261297
One container of waste leather gloves that is not closed.			



Waste Leather Glove Container not Closed in KOC Corrosion SAA			IMG-20240627091154115474025.jpg
06/27/2024 09:11 AM (AKT)	No CBI	No PII	Photographer: Jon Jones
KOC Corrosion (D Wing)/SAA			70.32545446, -149.61255916
One container of waste leather gloves that is not closed.			



Waste Leather Glove Container not Closed in KOC Corrosion SAA			IMG-20240627091715171577551.jpg
06/27/2024 09:17 AM (AKT)	No CBI	No PII	Photographer: Jon Jones
KOC Corrosion (D Wing)/SAA			70.32545471, -149.61256408
One container of waste leather gloves that is closed during the inspection.			



Two Containers of Compressed Gas Cylinders without Hazard Indicators in CPF-1 Central Shop SAA			IMG-202406270926032631177197.jpg
06/27/2024 09:26 AM (AKT)	No CBI	No PII	Photographer: Jon Jones
Central Processing Facility (CPF) 1/Central Shops/Toolroom and Central Shops Rotating			70.32512004, -149.61037659
Two containers of waste compressed gas cylinders without hazard indicators.			



Two Containers of Compressed Gas Cylinders without Hazard Indicators in CPF-1 Central Shop SAA			IMG-20240627092615261545873.jpg
06/27/2024 09:26 AM (AKT)	No CBI	No PII	Photographer: Jon Jones
Central Processing Facility (CPF) 1/Central Shops/Toolroom and Central Shops Rotating			70.32512004, -149.61037659
Two containers of waste compressed gas cylinders without hazard indicators.			



Container of Spent Mud Lab Reagents in Nabors 7ES SAA without a Hazard Indicator			IMG-20240627101651165176996.jpg
06/27/2024 10:16 AM (AKT)	No CBI	No PII	Photographer: Jon Jones
Nabors 7ES /Mud Lab			70.32581735, -149.60990396
SAA container of spent mud lab reagents that is not marked with a hazard indicator.			

Inspection Date(s):

06/26/2024 - 06/27/2024



Container of Spent Mud Lab Reagents in Nabors 7ES SAA without a Hazard Indicator			IMG-2024062710170317358498.jpg
06/27/2024 10:17 AM (AKT)	No CBI	No PII	Photographer: Jon Jones
Nabors 7ES /Mud Lab			70.32581735, -149.60990396
SAA container of spent mud lab reagents that is not marked with a hazard indicator.			



Two Containers of Used Oil at Nordic 3 Rig Labeled as "Waste Oil"			IMG-20240627121654165499271.jpg
06/27/2024 12:16 PM (AKT)	No CBI	No PII	Photographer: Jon Jones
Nordic 3 Rig/UO collection area just outside rig			70.33323657, -149.67739675
Two 300-gal tanks labeled "waste oil". Containment device labeled as "used oil".			

Inspection Date(s):

06/26/2024 - 06/27/2024



Two Containers of Used Oil at Nordic 3 Rig Labeled as "Waste Oil"			IMG-20240627121703173109086.jpg
06/27/2024 12:17 PM (AKT)	No CBI	No PII	Photographer: Jon Jones
Nordic 3 Rig/UO collection area just outside rig			70.33323657, -149.67739675
Two 300-gal tanks labeled "waste oil". Containment device labeled as "used oil".			

APPENDIX 2: DOCUMENT LOG

Document Type	Document Name	Contains CBI	Contains PII	Uploaded By	Date Received
Communications	RE EXTERNAL Inspection Photos-Contacts Email.msg	No	No	Jon Jones	07/03/2024
Communications	RCRA Inspection follow-up waste items.msg	No	No	Jon Jones	07/03/2024
Other - Safety Data Sheet	19. SylvaniaDataSheet.pdf	No	No	Jon Jones	07/03/2024
Communications	Requested documents.msg	No	No	Jon Jones	07/03/2024
Personnel Training	1. 2024 SAA and RCRA Basics Training Tracking (1).xlsx	No	No	Jon Jones	07/03/2024
Contingency Plan	4. 2023 LQG Waste Contingency Plan Kuparuk_FINAL.pdf	No	No	Jon Jones	07/03/2024
Other - Monthly CAA Inspections	8. HWCAA Monthly Inspection JAN - DEC 2024.xlsx	No	No	Jon Jones	07/03/2024
Facility SOPs	2. 2021 Red Book_Rev 11.pdf	No	No	Jon Jones	07/03/2024
Other - AK Waste Mgmt Plan	3. 2023 Alaska Waste Management Plan (Rev. 5).pdf	No	No	Jon Jones	07/03/2024
Other - Gen Status documentation	Gen Status 1.xlsx	No	No	Jon Jones	07/03/2024
Other - Gen Status Documentation	Gen Status 2.xlsx	No	No	Jon Jones	07/03/2024
Other - Corrective action photo	9. Leather Gloves mud box labeled.jpg	No	No	Jon Jones	07/03/2024
Other - Corrective action photo	10. Batteries repackaged.jpg	No	No	Jon Jones	07/03/2024
Other - Corrective action photo	11. Nonhaz blast media.jpg	No	No	Jon Jones	07/03/2024
Other - Corrective action photo	12. Nonhaz Glycol A.jpg	No	No	Jon Jones	07/03/2024
Other - Corrective action photo	13. Nonhaz Glycol B.jpg	No	No	Jon Jones	07/03/2024
Other - Corrective action photo	14. Spent mud reagents placard.jpg	No	No	Jon Jones	07/03/2024

Inspection Date(s):

06/26/2024 - 06/27/2024

Other - Corrective action photo	15. Spent mud reagents label.png	No	No	Jon Jones	07/03/2024
Other - Corrective action photo	16. Heat Lamp package.jpg	No	No	Jon Jones	07/03/2024
Other - Corrective action photo	17. Heat lamp stamp.jpg	No	No	Jon Jones	07/03/2024