

REGION 10 Enforcement Division

INSPECTION REPORT

Inspection Date(s):	06/08/2022 - 06/08/2022	Announced: No	
Time:	Entry: 10:49 AM (AKT)	Exit: 12:45 PM (AKT)	
Program:	RCRA		
Regulatory Program(s):	Title 40 - ENVIRONMENTAL PROTECTION AGENCY		
If Access is Denied:			
Company Name:	Alyeska Pipeline Service Company		
Facility or Site Name:	Alyeska TAPS Pump Station 4		
Facility/Site Physical Address:	Dalton Highway Milepost 270		
(City, state, zip code)	Deadhorse, AK 99740		
Type of Operation:	Crude oil transportation		
Size of Facility:	25 acres		
Length of Facility at Location:	Since 1974/1975		
Geographic Coordinates:	68.421666, -149.358637		
Mailing address: (Secondary Address)	Mr. Jan Shifflett, Environment Manager jan.shifflett@alyeska-pipeline.com Alyeska Pipeline Service Company 3700 Centerpoint West P.O. Box 196660, MS 507 CC: Ms. Gretchen Stoddard, Waste Management SME gretchen.stoddard@alyeska-pipeline.com		
(City, state, zip code)	Anchorage, AK 99519		
County:			
Facility/Site Identifier:	AKD980977318		
Media Number:	N/A		
NAICS:	48611 – Pipeline Transportation of Crude Oil		
Lead Inspector:			
Jon Jones	Jones, Jon	Digitally signed by Jones, Jon Date: 2022.07.22 10:46:01 -08'00'	
	REGION 10	Jones.Jon@epa.gov	(907) 271-6329
Additional Persons Participating in Inspection:			
Supervisor Review:			
Jen Sullivan	Jennifer A Sullivan	Digitally signed by Jennifer A Sullivan Date: 2022.08.01 08:40:11 -07'00'	
	REGION 10	Sullivan.Jennifer.A@epa.gov	(206) 553-6978

SECTION I – INTRODUCTION**Purpose of the Inspection/Objective**

Type of inspection: CEI - Compliance Evaluation Inspection

This was a Resource Conservation and Recovery Act (RCRA) inspection. The facility was inspected to ensure compliance with standards for hazardous waste generators and universal waste management (40 C.F.R. Part 262 through 273) and used oil management (40 C.F.R. Part 279). The inspection was conducted as part of a Core Program requirement for FY 2022.

Attendees

Title	Name	Phone	Email	Present in Opening Conf.	Present in Closing Conf.
Lead Inspector	Jon Jones	9072716329	Jones.Jon@epa.gov	Yes	Yes
PS04 Maintenance Supervisor	Mark Dahl	(907) 450-4402	mark.dahl@alyeska-pipeline.com	Yes	Yes
PS04 Lead Technician	Steve Barfield	(907) 450-4258	stephen.barfield@alyeska-pipeline.com	Yes	Yes
PS01-PS04 Environmental Coordinator	Ryan Studley	(907) 450-4185	ryan.studley@alyeska-pipeline.com	Yes	Yes

Opening Conference

EPA Lead Inspector Jon Jones arrived at the Alyeska TAPS Pump Station 4 at 10:49 AM (AKT) on 06/08/2022 for an inspection. I presented my credentials to Ryan Studley and informed him that this was an EPA RCRA inspection. The table above presents all the inspection opening and closing conference participants.

I was accompanied by Mr. Ratky during the inspection of the facility.

During the inspection I looked at the facility's processes, in addition to hazardous waste management practices, generation points, and accumulation areas. I looked for wastes that facility representatives had not yet identified or designated as hazardous. I also observed the facility's universal waste and used oil management. Specifically, I inspected the following areas of the facility listed below.

Only those areas in which I observed areas of concern or noted other pertinent issues are discussed in this inspection report.

Facility/Site Description

Alyeska TAPS PS04 (here after referred to as PS04 or facility) is in a remote area of Alaska, approximately 270 miles south of Deadhorse, Alaska on the Dalton Highway. The following information was obtained from Alyeska personnel during the inspection. The facility is a crude oil pipeline pumping station. Alyeska TAPS Pump Station 4 is one of twelve pumping stations along the TAPS. There are currently only four pump stations (1, 3, 4, and 9) that pump crude oil from Prudhoe Bay down to Valdez. Work performed at the facility includes:

- Pipeline maintenance
- Pig launching/receiving
- Pump station maintenance

Facility Info

Safety Training Provided to Inspector(s)?	No
Operating Hours	24/7, 365 with 12-hour shifts
Weather Conditions	Cool and windy
Number of employees	45
What type of generator facility notified?	LQG
What type of generator facility verified as?	LQG

Process Description

A description of the facility's wastes and the amounts that were in accumulation at the facility during the inspection are contained within the attached weekly container inspection logs that are listed in the Section VI – Document Log.

Building(s)

Building/Area/Sub-area	Process Description	Area of Concern
Equipment shop	CAA	No
Hazardous Waste Storage Conex	CAA	No
Helicopter building	Helicopter hangar and SAA	No
Manifold building	Pigs are received and relaunched further down the TAPS. Pig wax is generated as a waste and accumulated in the Manifold building CAA.	No
CAA	Accumulation area for the waste pig wax.	No
Oil Spill Contingency Plan (OSCP) building	SAA	No
Shop/Warehouse building	CAA	No
Tank farm CAA	Hazardous waste storage area for waste pig wax.	No
Warm Storage Tent	Used as an overflow CAA	No

SECTION II – OBSERVATIONS AND RECORDS REVIEW**Observations**

Building: Manifold building/CAA	Contains CBI: No
Observation #: JJ1-OB-001	Date: 06/08/2022
At the time of the inspection, there was one 55-gallon container of waste pig wax in the CAA. According to Alyeska personnel a pig was being received at PS04 every two weeks and they typically generate four 55-gallon containers of waste pig wax each time the pig is received.	
Building: Tank farm CAA	Contains CBI: No
Observation #: JJ1-OB-002	Date: 06/08/2022
At the time of the inspection, there were seven 55-gallon containers of waste pig wax in accumulation.	
Photo(s)	
1. IMG-202206081125482548973520.jpg	
2. IMG-20220608112605265840089.jpg	
Building: Warm Storage Tent	Contains CBI: No
Observation #: JJ1-OB-003	Date: 06/08/2022
At the time of the inspection, there was no waste in accumulation at the Warm Storage Tent. According to Alyeska personnel, the CAA is used for projects that may generate a large amount of waste.	

Records Review

Record: Manifests		AOC: No
Ref #: JJ1-RR-001	Reviewed By: Jon Jones	Reviewed Date: 07/20/2022
While reviewing hazardous waste manifests, sent to me following the inspection, I saw that manifest #012646462 FLE, for a shipment that left PS4 on 9/9/21, was not dated by the generator. I followed up by searching E-Manifest and after finding the manifest, I saw a note of the discrepancy on the manifest and saw that the designated facility had added the 9/9/21 date for the generator.		
Document(s)		
1. PS04 Waste Run Paperwork 090921.pdf 2. Manifest_012646462FLE.pdf		
Record: Manifests		AOC: No
Ref #: JJ1-RR-002	Reviewed By: Jon Jones	Reviewed Date: 07/21/2022
During my review of the manifests, I saw that there was an internal memo regarding delayed waste shipments during the onset of COVID. One of those delayed shipments was a shipment from PS04. A copy of the memo and manifest for that delayed shipment is included as an attachment to this report and included in the Section VI - Document Log.		

Document(s)

1. COVID waste pickup delay.pdf
2. 012645914 TSD.pdf

SECTION III – AREAS OF CONCERN

The presentation of areas of concern does not constitute a formal compliance determination or violation.

I observed no areas of concern at the time of the inspection.

SECTION IV – FOLLOW UP

N/A

Closing Conference

At the conclusion of the inspection, I conducted a closing conference that was attended by those listed in the Attendees table, in Section I of this report. I thanked everyone for their time and cooperation during the inspection. I then explained the follow-up process that would take place once I finished the report. I explained they would receive a copy of the report as would a case officer. I told those present at the closing conference that I had not observed any areas of concern during my inspection of the facility; however, areas of concern could still be identified once the inspection report was completed and reviewed.

SECTION V – SAMPLING ACTIVITIES AND ANALYTICAL RESULTS - No sampling was conducted.**SECTION VI – LIST OF APPENDICES****Photo Log**

[Title]	
IMG-202206081125482548973520.jpg	
06/08/2022 11:25 AM (AKT)	
Jon Jones	
Tank farm CAA	
No CBI	
No PII	
View of the CAA.	

[Title]	
IMG-20220608112605265840089.jpg	
06/08/2022 11:26 AM (AKT)	
Jon Jones	
Tank farm CAA	
No CBI	
No PII	
Another view of the CAA.	

Document Log

Document Type	Document Name	Contains CBI	Contains PII	Uploaded By	Date Received
Facility Map	Facility map.pdf	No	No	Jon Jones	07/19/2022
Other - PS4 monthly waste generation rates	PS1 and PS4 monthly waste generation.pdf	No	No	Jon Jones	07/19/2022
Other - Weekly container log	Weekly container inspection log.pdf	No	No	Jon Jones	07/19/2022
Contingency Plan	PS04 RCRA C-Plan Appendix C wcover.pdf	No	No	Jon Jones	07/19/2022
Records Review	PS04 Waste Run Paperwork 090921.pdf	No	No	Jon Jones	07/20/2022
Records Review	Manifest_012646462FLE.pdf	No	No	Jon Jones	07/20/2022
Records Review	COVID waste pickup delay.pdf	No	No	Jon Jones	07/21/2022
Records Review	012645914 TSD.pdf	No	No	Jon Jones	07/21/2022