



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

GENERAL INFORMATION

Facility Name: American Gilsonite Company

RCRA ID: XHU982647232

Facility Location:

29950 South Bonanza Highway

Bonanza, Utah

Lat/Long: 40.019296, -109.175080

Facility Contact:

Jonathan Lombardo, Engineering,

Environmental and QA/QC Supervisor

435-789-1921 Ext 452

Notification Status:

Small Quantity Generator

Date of Inspection: October 25, 2022

Arrival Time: 9:05 a.m.

Departure Time: 12:40 p.m.

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

Inspection Attendees:

1. Jonathan Lombardo, Eng/Env/QA/QC Supervisor, American Gilsonite Company
2. Gregg Galecki, Surface Operations Manager, American Gilsonite Company

Type and Purpose of Inspection:

Compliance Evaluation Inspection

Compliance with RCRA Subtitle C

Facility Type: NAICS 212390 Nonmetallic Mineral Mining and Quarrying

Applicable Regulations: 40 CFR Parts 260 to 279

Inspection Type: Unannounced Inspection

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 facility, an opening conference was conducted with Mr. Galecki. I presented my federal inspector credentials, explained the purpose of the inspection, and provided a warning to identify confidential business information if discussed, viewed, or photographed. A short time later we were joined by Mr. Lombardo.

I was not denied access to the facility and was allowed to inspect all areas that I selected for inspection.

Facility Name: American Gilsonite (XHU982647232)

Facility Location: Lat/Long: 40.019296, -109.175080

Dates of Inspection: October 25, 2022

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

DESCRIPTION OF INSPECTION

Regulatory Status

According to RCRAInfo, at the time of the inspection, American Gilsonite was a small quantity generator (SQG) of hazardous waste. During the inspection, discussions with the facility personnel indicated that the facility's generator status was very small quantity generator (VSQG). Following the inspection, Mr. Lombardo updated the facility's notification status in RCRAInfo to VSQG.

Facility and Process Description

American Gilsonite is a processing facility for uintaite (trademark name Gilsonite), a naturally occurring solid hydrocarbon mineral. According to the facility's website, uintaite is used in oilfield and construction applications, in asphalt, and in inks, paints and stains. Processing includes, but is not limited to, pulverizing, sizing and packaging.

The facility employs approximately 75 people, with operations typically occurring in 10-hour shifts four days per week. Operations have occurred at this location for over a century. The site currently includes office space, a maintenance shop, a laboratory, warehouse space, a wash bay, water treatment, and processing and sizing. A site map is included as Attachment 1 - Site Map.

TOUR INFORMATION

Mr. Lombardo and Mr. Galecki accompanied me during the facility 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:

- Warehouse
- Oil Dock (central accumulation area)
- Maintenance Shop
- Water Treatment
- Vehicle Wash Area
- Plant Packaging Warehouse
- Boneyard
- QC Laboratory

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.

In the northern portion of the oil dock I observed several dozen 55-gallon drums in storage, including 14 drums of used oil and soil, 8 drums of antifreeze, one drum of used oil in an overpack container, one

Facility Name: American Gilsonite (XHU982647232)

Facility Location: Lat/Long: 40.019296, -109.175080

Dates of Inspection: October 25, 2022

drum of used oil from lab 470 (contained new material that could not be used so was in storage for disposal), 4 drums of surfactant awaiting reuse, one drum of waste diesel fuel with water, as well as two five-gallon containers of used glycerin and one five-gallon container of used saw oil with water. In addition, several empty 55-gallon drums were stored in the area, including empty sulfuric acid drums. See photos 1-3.

In the maintenance shop area, I observed a used oil tank (photo 4), one 55-gallon drum marked on one side "Used Mineral Oil" and on the other side marked "Used Antifreeze" (see photos 4 and 5), one open, unlabeled bucket containing a sludgy, oily looking waste that appeared to be floating on water in the bucket, a blue used oil bin in the shop that was not marked with the words "Used Oil", a closed oily rags can, a 55-gallon aerosol can puncture drum that was initially open but was closed as I observed (photos 6-8), and a parts washer (photos 9 and 10). Prior to leaving the maintenance shop area, I observed that the incorrect marking on the 55-gallon drum that had two separate markings had been painted over so that only "Used Antifreeze" was left marked on the container (photo 11).

At the QC Lab I observed a small outdoor toluene still that the facility personnel stated is no longer in use. When operated, the unit generated a sludge.

Record Review:

Following the site tour, I viewed the SPCC plan and Tier II notification documentation but did not evaluate them because it was beyond the scope of this RCRA inspection.

CLOSING CONFERENCE

During the closing conference, I discussed with Mr. Lombardo and Mr. Galecki that it appeared the facility's generator status might be VSQG due to the limited quantities of hazardous waste generated. I also requested a photo of the blue used oil bin located in the maintenance shop after it was labeled or marked with the words "Used Oil".

Post-Inspection Documentation Received

Following the inspection, on 10/27/2022, Mr. Galecki provided by email a photograph of the blue used oil bin located in the maintenance shop showing that it had been properly labeled. On 11/3/2022, Mr. Lombardo provided by email form 8700-12 updating the facility's generator status to VSQG.

SIGNATURES

Annette Maxwell, Lead RCRA Inspector

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

Facility Name: American Gilsonite (XHU982647232)
Facility Location: Lat/Long: 40.019296, -109.175080
Dates of Inspection: October 25, 2022

ATTACHMENT LIST

Attachment 1 – Site Map

Attachment 2 – Photograph Log

Attachment 1 – Site Map

American Gilsonite
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Bonanza, Utah

Gasoline tank

Water Treatment
(north portion of
building)

Maintenance shop

Processing and sizing
(overall
area)

Oil dock central
accumulation area
(north portion of
dock)

Pump house and
wash bay

QC Laboratory



Facility Name: American Gilsonite Company (XHU982647232)
Facility Location: 29950 South Bonanza Highway, Bonanza, Utah
Dates of Inspection: October 25, 2022

Attachment 1 – Photograph Log

For all photographs:

Photographer - Annette Maxwell

Camera Model and ID - Nikon Coolpix S7000, B00228

Photo 1, DSCN1620.jpg, photo of the north portion of the oil dock, facing east/northeast.



Facility Name: American Gilsonite Company (XHU982647232)
Facility Location: 29950 South Bonanza Highway, Bonanza, Utah
Dates of Inspection: October 25, 2022

Photo 2, DSCN1621.jpg, photo of the same area shown in photo 1, panned left.



Facility Name: American Gilsonite Company (XHU982647232)
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Dates of Inspection: October 25, 2022

Photo 3, DSCN1622.jpg, photo of the north portion of the oil dock, taken from the interior south side.



Facility Name: American Gilsonite Company (XHU982647232)
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Photo 4, DSCN1623.jpg, photo of the used oil tank and a drum marked “Used Mineral Oil” located in the Maintenance Shop area. See also photo 5.



Facility Name: American Gilsonite Company (XHU982647232)
Facility Location: 29950 South Bonanza Highway, Bonanza, Utah
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Photo 5, DSCN1624.jpg, photo of the other side of the drum shown in photo 4, marked on this side of the drum with “Used-Antifreeze”.



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Photo 6, DSCN1625.jpg, photo of an aerosol can puncture drum located in the maintenance shop.



Facility Name: American Gilsonite Company (XHU982647232)
Facility Location: 29950 South Bonanza Highway, Bonanza, Utah
Dates of Inspection: October 25, 2022

Photo 7, DSCN1626.jpg, photo of the markings on the drum shown in photo 6.



Facility Name: American Gilsonite Company (XHU982647232)
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Photo 8, DSCN1627.jpg, photo of the same drum shown in photos 6 and 7 after facility personnel closed the puncturing mechanism lid.



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Dates of Inspection: October 25, 2022

Photo 9, DSCN1628.jpg, photo of a parts washer located in the maintenance shop.



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Photo 10, DSCN1629.jpg, photo of the label on the parts washer shown in photo 9.



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Photo 11, DSCN1630.jpg, photo of the drum shown in photos 4 and 5 after the incorrect marking had been removed from the drum.

