

REGION 10 Enforcement Division

INSPECTION REPORT

Inspection Date(s):	04/28/2021 - 04/28/2021		Announced: No
Time:	Entry: 02:55 PM (AKT)	Exit: 03:49 PM (AKT)	
Program:	RCRA		
Regulatory Program(s):	Title 40 - ENVIRONMENTAL PROTECTION AGENCY		
If Access is Denied:			
Company Name:	Harvest Alaska, LLC		
Facility or Site Name:	HARVEST ALASKA - MIDSTREAM PIPELINE DIVISION - EAST FORELANDS		
Facility/Site Physical Address:	53550 RODNEY & SHELLEY'S AVE		
(city, state, zip code)	NIKISKI, AK 99611		
Type of Operation:	Natural gas pipeline junction facility		
Size of Facility:	10 acres		
Length of Facility at Location:	Since 1969		
Geographic Coordinates:	60.736485, -151.33638		
Mailing address:	Mr. Kijun Hong, Environmental Specialist khong@harvestmidstream.com		
(Secondary Address)	3800 Centerpoint Drive, Suite 1400		
(city, state, zip code)	Anchorage, AK 99503		
County:			
Facility/Site Identifier:	AKR000204230		
Media Number:	Unpermitted Facility		
NAICS:	486210 – Pipeline Transportation of Natural Gas		
Lead Inspector:			
Jon Jones	Jones, Jon		Digitally signed by Jones, Jon Date: 2021.07.07 13:51:58 -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: 2021.07.12 15:21:56 -07'00'
	REGION 10	Sullivan.Jennifer.A@epa.gov	(206) 553-6978

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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 2021.

Attendees

Title	Name	Phone	Email	Present in Opening Conf.	Present in Closing Conf.
Lead Inspector	Jon Jones	9072716329	Jones.Jon@epa.gov	Yes	Yes
Environmental Specialist	Kijun Hong	(505) 436-8457	khong@harveststream.com	Yes	Yes
Safety Specialist II	Eric Wilcox	(907) 283-1375	ewilcox@harvestmidstream.com	Yes	Yes
Lead Operator	Elijah Gerow	(907) 398-9976	egerow@harvestmidstream.com	Yes	Yes

Opening Conference

EPA Lead Inspector Jon Jones arrived at the HARVEST ALASKA - MIDSTREAM PIPELINE DIVISION - EAST FORELANDS at 02:55 PM (AKT) on 04/28/2021 for an inspection. I presented my credentials to Eric Wilcox and informed him that this was an EPA RCRA inspection. The table above presents all the inspection participants.

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. No universal waste or used oil was observed during the inspection.

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

I was accompanied for the entirety of the inspection by Messrs. Hong, Wilcox, and Gerow.

Facility/Site Description

The Harvest Alaska - Midstream Pipeline Division - East Forelands facility is a natural gas pipeline junction located along the shores of Nikiski Bay, on Cook Inlet in Nikiski, Alaska.

Facility Info

Number of employees	Unmanned facility
What type of generator facility notified?	Not a generator

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Process Description

The facility is a flow through facility with a 10 inch gas line and a 10 inch crude oil line that comes into the facility from Cook Inlet production platforms and exits the facility, going to a Kenai Pipeline (KPL) junction where it enters the Kenai/Nikiski pipeline and gets sent to processing facilities.

Building(s)

Building/Area	Process Description	Area of Concern
Filter room	Used to have filters or what was referred to as separators that pulled liquid out of the gas. The separators were removed in 2015 and the building is now used for storage.	No
Office		No
Storage building		No

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

Building: Filter room	Contains CBI: No
Observation #: JJ1-OB-002	Date/Time: 04/28/2021
While I was inspecting the Filter room, I saw a smart ash burner. I also saw three 55-gallon containers that held ash from the burner as well as additional debris. According to Mr. Wilcox oil filters, rags, absorbent pads , and pig parts (Brushes) were burned using the smart ash burner. I asked about the burning of the pig brushes and Mr. Wilcox said the brushes were put in the smart ash burner to burn off the paraffin (Pig wax) from the pig brushes.	
Photo(s) Observation Image-20210428152608268716803.jpg Observation Image-202104281526192619386138.jpg Observation Image-202104281526362636582430.jpg	

Records Review

There were no records at the facility to be reviewed.

SECTION III – AREAS OF CONCERN

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

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

SECTION IV – FOLLOW UP**Building:** Filter room**Area:****Sub-area:****JJ1-OB-002**

Following the inspection, I sent an email, dated 5/6/2021, to Mr. Hong. In that email I asked, “While at the facility, there were three smart ash burn barrels located in the storage building. All of the barrels held ash and solids. One barrel contained brushes from a pig and the contents of the barrel had a very strong odor, similar to a solvent or maybe petroleum based. Can you tell me when the last time pig wax was generated at the facility and how that waste was managed? Please provide any applicable disposal paperwork you have too. There were remnants of filters in the other barrels too. Can you tell me what the filters would have been contaminated with? I am including the photos taken so you can see what I’m referring to. Let me know if you have any questions.”

Mr. Hong responded in an email, dated 5/7/2021 with the following information:

“OK, here is what I’ve found:

- Can you tell me when the last time pig wax was generated at the facility and how that waste was managed?
 - **We have not received wax at this location for a long time (last 10 years).**
- Can you tell me what the filters would have been contaminated with?
 - **Motor Oil**
 - **Natural Gas Condensate**

Let me know if there is anything else we can provide!

Kijun”

Closing Conference

I thanked everyone for their time and cooperation during the inspection and began a review of the areas of concern that I observed during my walk-through inspection and paperwork review while at the facility. I explained that I had not observed any areas of concern while inspecting the facility; however, I did tell Messrs. Hong, Wilcox, and Gerow that areas of concern could be still be identified after a review of the information gathered from the inspection. I answered any questions they had and explained the follow-up process that would take place after the inspection.

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

[Title] Observation_Image-20210428152608268716803.jpg 04/28/2021 03:26 PM (AKT) Jon Jones Filter room No CBI No PII View inside of a 55-gallon drum that contains ash residue from burning oil filters, rags, absorbent pads , and pig parts in a smart ash burner.	
[Title] Observation_Image-202104281526192619386138.jpg 04/28/2021 03:26 PM (AKT) Jon Jones Filter room No CBI No PII View inside of a second 55-gallon drum that contains ash residue from burning oil filters, rags, absorbent pads , and pig parts in a smart ash burner.	

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[Title]	
Observation_Image-202104281526362636582430.jpg	
04/28/2021 03:26 PM (AKT)	
Jon Jones	
Filter room	
No CBI	
No PII	
View inside of a third 55-gallon drum that contains ash residue from burning oil filters, rags, absorbent pads , and pig parts in a smart ash burner. Brushes from a pig can be seen here on top of the ash pile.	

Document Log

Document Type	Document Name	Contains CBI	Contains PII	Uploaded By	Date Received
Inspection Reports	Field_Notes_AKR000204230v1.0.pdf	No	No	Jon Jones	07/07/2021
Communications	FW_ [EXTERNAL] April 28, 2021 RCRA inspection at the East Forelands facility.pdf	No	No	Jon Jones	07/07/2021
Communications	RE_ [EXTERNAL] April 28, 2021 RCRA inspection at the East Forelands facilit.pdf	No	No	Jon Jones	07/07/2021