

REGION 10 Enforcement Division

INSPECTION REPORT

Inspection Date(s):	07/26/2021 - 07/26/2021	Announced: No	
Time:	Entry: 09:10 AM (AKT)	Exit: 10:33 AM (AKT)	
Program:	RCRA		
Regulatory Program(s):	Title 40 - ENVIRONMENTAL PROTECTION AGENCY		
If Access is Denied:			
Company Name:	Harvest Alaska, LLC		
Facility or Site Name:	SWANSON RIVER OIL PIPELINE		
Facility/Site Physical Address:	48775 KENAI SPUR HWY		
(City, state, zip code)	KENAI, AK 99611		
Type of Operation:	Pipeline transportation of crude oil		
Size of Facility:	Approximately 100 square feet		
Length of Facility at Location:	Since 1960's		
Geographic Coordinates:	60.685662, -151.392717		
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:	AKD035419795		
Media Number:			
NAICS:	486110 – Pipeline Transportation of Crude Oil		
Lead Inspector:			
Jon Jones	Jones, Jon	Digitally signed by Jones, Jon Date: 2021.10.19 12:45:50 -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: 2021.10.19 15:05:01 -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 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 Swanson River Oil Pipeline facility at 09:10 AM (AKT) on 07/26/2021 for an inspection. I presented my credentials to Kijun Hong 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 site is a Pig Receiving Station within a crude oil tank farm located west of the Tesoro Alaska Company, LLC – Kenai Refinery.

Facility Info

Weather Conditions	Clear and sunny
Operating Hours	24/7 operation
Safety Training Provided to Inspector(s)?	No
What type of generator facility notified?	SQG
What type of generator facility verified as?	VSQG

Harvest Alaska, LLC maintains a Pig receiving station located within the footprint of a crude oil tank farm. The area itself is approximately 100 square feet in size. The rest of the facility is owned and operated by Marathon Oil. Marathon Oil also owns the Tesoro Alaska Company, LLC – Kenai Refinery. An inspection (RCRA) of the Marathon Oil facility was conducted on September 12, 2013 and at that time the facility was owned by Tesoro Alaska Company, LLC and operated by Kenai Pipeline Company.

Process Description

A pipeline pig used to scrape the inside of the pipeline is received at the pigging station, located inside the tank farm. The pig is put into the pipeline at the Swanson River Production facility and after receiving the pig at the tank farm, pig wax is removed from the pig. The pig wax is scraped off into a trough at the end of the receiving station. After scraping the pig, the pig wax or paraffin is then shoveled back into the pipeline where the pig was removed and pushed on to the tank farm and then eventually being refined at the Tesoro Alaska Company, LLC – Kenai Refinery. The pig is then taken across the street to the Kenai Pipeline (KPL) Junction where it is placed into a hot wash tank for final cleaning. This process generates waste absorbents that are contaminated with crude oil and pig wax or paraffin that is generated from cleaning the pigs in the hot wash tank. The absorbent pads are accumulated in the room where the hot wash tank is located and eventually taken to the facility's East Forelands facility and burned in a smart ash burner.

Building(s)

Building/Area/Sub-area	Process Description	Area of Concern
Pigging Station	Location where pigs are removed from the pipeline as they come in from the Swanson River Production Facility.	Yes

SECTION II – OBSERVATIONS AND RECORDS REVIEW

Observations

Building: Pigging Station	Contains CBI: No
Observation #: JJ1-OB-001	Date: 07/26/2021
Mr. Gerow said pigs generally come through the pigging station from the Swanson River Production Facility every five to ten days. According to Mr. Gerow, pigs come out and five to ten gallons of pig wax is scrapped off inside the pig trough. Mr. Gerow said the pig wax is shoveled back into the pipeline where it goes back into the crude oil that is piped across the street to Marathon's (Tesoro Alaska Company, LLC - Kenai Refinery) crude tanks before going into the refinery. Mr. Gerow said the pig is taken across the street to the Harvest Midstream – KPL Junction (AKR000203125), formerly Kenai Pipeline (KPL) Junction, located at 48780 Kenai Spur Highway. According to Mr. Gerow, the pig is placed inside of a hot wash tank. Once inside the wash tank, all the solids float up to the top and are collected on absorbent pads. The absorbents pads are collected in a trash can and then taken to the Harvest Alaska-Midstream Pipeline Division-East Forelands facility and burned in the smart ash burner.	
Photo(s) Observation Image-202107261002202201994341.jpg Observation Image-202107261002392391765590.jpg Observation Image-202107261003133131935576.jpg Observation Image-202107261027002701766181.jpg Observation Image-2021072610273027301969190.jpg	

6. [Observation Image-202107261028042841609892.jpg](#)

Records Review

Record: Facility Layouts		AOC: No
Ref #: JJ1-RR-001	Reviewed By: Jon Jones	Reviewed Date: 07/26/2021
Following the inspection, Mr. Hong provided me with a diagram of the piping system around the pigging station at the Swanson River Oil Pipeline facility.		
Document(s)		
1. Swanson River Oil PL drawing.pdf		

Record: Waste Determination Documents		AOC: No
Ref #: JJ1-RR-002	Reviewed By: Jon Jones	Reviewed Date: 07/26/2021
Following the inspection, Mr. Hong provided me with analytical results for the ash generated by the smart ash burner at their East Forelands facility.		
Document(s)		
1. EFOR - Smart Ash Sample.pdf		

SECTION III – AREA OF CONCERN

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

Building: Pigging Station	Area:	Sub-area:
JJ1-OB-001		
Pig is taken across the street to the Kenai Pipeline (KPL) Junction where it's placed inside of a hot wash tank. Once inside the wash tank, all the solids float up to the top and are collected on absorbent pads. The absorbents pads are collected in a trash can and then taken to the Harvest Alaska-Midstream Pipeline Division-East Forelands facility and burned in the smart ash burner.	Citations:	Sections:

SECTION IV – FOLLOW UP

I observed no follow up at the time of the inspection.

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.

Prior to the closing conference, I asked Mr. Hong if he would send me a piping diagram of the pigging station as well as a copy of the analytical results for the ash generated at their East Forelands facility.

Following the Inspection

After the leaving the facility, I sent an email to Mr. Hong, on 7/26/21, requesting the following additional information:

1. Diagram of the piping at the pigging station
2. Copies of the smart ash burner log from 2018 to the present
3. How the hot wash water was being managed following the pig cleaning
4. Generation rate for the absorbent pads generated at the KPL junction

Mr. Hong responded on 7/26/21 with the following information:

1. Piping diagram
2. Smart ash analytical results
3. Pig wash water is changed out every six months. US Ecology comes and pulls/disposes of those liquids for us.
4. It takes about 2-3 weeks for the trashcan in the pig wash station to fill up.
5. Jared, one of our operators is grabbing the log from East Forelands and we should have records scanned over to you tomorrow.

On 7/27/21 I received an email from Mr. Hong that included the smart ash burner logs for the period from 2018 through 2021. After reviewing the smart ash burner log, I saw that starting in 2018 the facility was logging pig wax which was classified in the log with an "H." I asked Mr. Hong what the "H" signified and he said it signified that the waste to be incinerated in the smart ash burner was hazardous. It was at that time that I identified this as an area of concern. A review of the logs for the years 2019 through 2021 show the same waste either logged in as "N" (Non-hazardous) or as an "Exempt" waste. According to facility personnel on the day of the inspection, the pig wax is coming out of transportation lines and would not be exempt.

On 8/25/21 the facility updated their notification (8700-12) with a change in the facility name to Harvest Alaska – SROP Receiver.

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

[Title] 07/26/2021 10:11 AM (AKT) Jon Jones Pigging Station No CBI No PII View of the pigging station at the Swanson River Oil Pipeline facility.	
[Title] 07/26/2021 10:29 AM (AKT) Jon Jones KPL Junction Pig Cleaning Area No CBI No PII View of the pigs hanging above the hot wash tank at the KPL Junction, adjacent to the trash can, full of the absorbent pads with pig wax residue.	

[Title]		
07/26/2021 10:02 AM (AKT)		
Jon Jones		
Pigging Station		
No CBI		
No PII		
View of the pig receiver and trough at the Swanson River Oil Pipeline facility.		
[Title]		
07/26/2021 10:02 AM (AKT)		
Jon Jones		
Pigging Station		
No CBI		
No PII		
View of the trough and cleaning tools used to scrape pig wax off the pig.		
[Title]		
07/26/2021 10:03 AM (AKT)		
Jon Jones		
Pigging Station		
No CBI		
No PII		
Close-up view of the pig wax solids in the bucket and trough at the Swanson River Oil Pipeline facility.		

[Title]	
07/26/2021 10:27 AM (AKT)	
Jon Jones	
KPL Junction Pig Cleaning Area	
No CBI	
No PII	
View of the hot wash tank, adjacent to the trash can full of waste absorbent pads, at the KPL Junction.	
[Title]	
07/26/2021 10:27 AM (AKT)	
Jon Jones	
KPL Junction Pig Cleaning Area	
No CBI	
No PII	
View inside the hot wash tank, showing the absorbent pads floating on top of the water.	
[Title]	
07/26/2021 10:28 AM (AKT)	
Jon Jones	
KPL Junction Pig Cleaning Area	
No CBI	
No PII	
View of the trash can, showing the accumulation of waste absorbent pads from the hot wash tank.	

Document Log

Document Type	Document Name	Contains CBI	Contains PII	Uploaded By	Date Received
Records Review	Swanson River Oil PL drawing.pdf	No	No	Jon Jones	07/26/2021

SWANSON RIVER OIL PIPELINE
Inspection Date(s):
07/26/2021 - 07/26/2021

Records Review	EFOR - Smart Ash Sample.pdf	No	No	Jon Jones	07/26/2021
Inspection Reports	Field_Notes_AKD035419795v1.0.pdf	No	No	Jon Jones	07/26/2021
Communications	Harvest Alaska - RCRA Inspection.pdf	No	No	Jon Jones	09/23/2021
Other - Smart ash burner logs for the East Forelands Facility 2018	Waste Generator Log - 2018.pdf	No	No	Jon Jones	09/23/2021
Other - Smart ash burner logs for the East Forelands Facility 2019	Waste Generator Log - 2019.pdf	No	No	Jon Jones	09/23/2021
Other - Smart ash burner logs for the East Forelands Facility 2020	Waste Generator Log - 2020.pdf	No	No	Jon Jones	09/23/2021
Other - Smart ash burner logs for the East Forelands Facility 2021	Waste Generator Log - 2021.pdf	No	No	Jon Jones	09/23/2021
Communications	RE_ [EXTERNAL] Swanson River Oil Pipeline Inspection.pdf	No	No	Jon Jones	09/23/2021
Manifests	KPL Junction Manifests.pdf	No	No	Jon Jones	09/23/2021
Communications	RE_ [EXTERNAL] Swanson River Oil Pipeline Inspection.pdf	No	No	Jon Jones	09/23/2021