

REGION 10 Enforcement Division

INSPECTION REPORT

Inspection Date(s):	05/27/2021 - 05/27/2021	Announced: No	
Time:	Entry: 07:53 AM (AKT)	Exit: 11:57 AM (AKT)	
Program:	RCRA		
Regulatory Program(s):	Title 40 - ENVIRONMENTAL PROTECTION AGENCY		
If Access is Denied:			
Company Name:	OBI Seafoods, LLC		
Facility or Site Name:	OCEAN BEAUTY SEAFOODS INC KODIAK FACILITY		
Facility/Site Physical Address:	621 SHELKOF ST		
(city, state, zip code)	KODIAK, AK 99615		
Type of Operation:	Seafood Processor		
Size of Facility:	127,000 square feet		
Length of Facility at Location:	Since 1910		
Geographic Coordinates:	57.78498, -152.421253		
Mailing address: (Secondary Address)	Mr. Alex Thatcher, Environmental Compliance Manager OBI Seafoods, LLC 1100 West Ewing Street, Seattle, WA 98119 Phone: (206) 285-6800 Mobile: (206) 455-5488 alex.thatcher@obiseafoods.com CC: Mr. James Turner, Plant Manager james.turner@obiseafoods.com Ocean Beauty Seafoods, Inc. – Kodiak Facility (907) 486-5791		
(city, state, zip code)	Seattle, WA 98119		
County:	King		
Facility/Site Identifier:	AKD063376974		
Media Number:	Unpermitted Facility		
NAICS:	311710 – Seafood Product Preparation and Packaging		
Lead Inspector:			
Jon Jones			
	REGION 10	Jones.Jon@epa.gov	(907) 271-6329
Additional Persons Participating in Inspection:			
Supervisor Review:			
Jen Sullivan			
	REGION 10	Sullivan.Jennifer.A@epa.gov	(206) 553-6978

Inspection Date(s):

05/27/2021 - 05/27/2021

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
Plant Manager	James Turner	(907) 486-5791	james.turner@obiseafoods.com	Yes	Yes
Director of Maintenance and Engineering	Don Dillon	(907) 486-5791	don.dillon@obiseafoods.com	Yes	No
Environmental Compliance Manager	Alex Thatcher	(206) 455-5488	alex.thatcher@obiseafoods.com	Yes	Yes
QA Manager	Ryan Musch	(907) 486-5791	ryan.musch@obiseafoods.com	Yes	Yes
Safety Manager	Rome Kamai	(907) 539-2412	rome.kamai@obiseafoods.com	Yes	No

Opening Conference

EPA Lead Inspector Jon Jones arrived at the Ocean Beauty Seafoods, Inc - Kodiak Facility at 07:53 AM (AKT) on 05/27/2021 for an inspection. I presented my credentials to James Turner and informed him that this was an EPA RCRA inspection. The table above presents all the opening and closing conference inspection participants.

During the opening conference, Mr. Turner told me that Ocean Beauty had recently acquired Icicle Seafoods and the company changed its name to OBI Seafoods, LLC. OBI is an abbreviation for Ocean Beauty Icicle.

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 used oil management.

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

I was accompanied for the entirety of the inspection by Messrs. Thatcher, Dillon, Musch and Kamai.

Facility/Site Description

Ocean Beauty Seafoods, Inc. – Kodiak Facility is a Seafood Processor located in Kodiak, AK. A copy of the facility's Notice of Intent, required as part of the facility's CWA/NPDES permit, was obtained during the inspection and contains additional information about the facility, including the types of seafood processed at

Inspection Date(s):

05/27/2021 - 05/27/2021

the facility.

Facility Info

Number of employees	50 to 350 seasonally, currently 287
Weather Conditions	Clear and sunny
Safety Training Provided to Inspector(s)?	No
What type of generator facility notified?	Very Small Quantity Generator (VSQG)
What type of generator facility verified as?	Verified VSQG by Alex Thatcher
Operating Hours	24/7/365

Process Description

According to OBI representatives, the following wastes are generated at the Kodiak facility:

- Cooking oil - sent to Arlington, WA facility
- Used oil from forklifts - sent to Arlington, WA facility
- Used oil from refrigeration - sent to Arlington, WA facility
- LED lighting - sent to Arlington, WA facility
- Aerosol wastes, WD-40, paints, etc - disposed of locally as solid waste
- Latex paint - sent to Arlington, WA facility
- Diesel used as a solvent - sent to Arlington, WA facility
- Mineral Spirits - sent to Arlington, WA facility
- Rags/wipes contaminated with MEK - disposed of locally as solid waste
- Videojet makeup fluid (D001) - sent down to Arlington, WA facility

Building(s)

Building/Area	Process Description	Area of Concern
Cannery		No
Fabrication forklift shop		Yes
Galley		No
Trash dumpster located just to the left of the galley entrance		Yes

Inspection Date(s):

05/27/2021 - 05/27/2021

Maintenance Shop		Yes
Oil Storage Van	Accumulation of used gasoline, used antifreeze, used solvent (Stoddard solvent according to Mr. Dillon), and used oil.	Yes
South end warehouse	used oil and product storage	No

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

Building: Cannery	Contains CBI: No
Observation #: JJ1-OB-006	Date/Time: 05/27/2021
While in the Cannery I saw three additional quart size containers of waste ink on a table.	
Photo(s) 1. Observation Image-202105271019511951421272.jpg 2. Observation Image-202105271019581958331812.jpg 3. Observation Image-20210527102007207439341.jpg	

Building: Fabrication forklift shop	Contains CBI: No
Observation #: JJ1-OB-002	Date/Time: 05/27/2021
While inspecting the contents of some flammable storage cabinets, I saw some containers of Methyl Ethyl Ketone (MEK). I asked what the MEK was used for and Mr. Dillon said it was used for thinning paint and clean up. I asked if rags/wipes were used with the MEK. Mr. Dillon told me that rags/wipes were used for clean-up. I then asked how the rags/wipes were being managed and he told me they were disposed of into the trash as solid waste.	
Photo(s) 1. Observation Image-202105270857185718495419.jpg 2. Observation Image-202105270858105810433334.jpg 3. Observation Image-202105270858165816434646.jpg	

Building: Galley/Trash dumpster located just to the left of the galley entrance	Contains CBI: No
Observation #: JJ1-OB-004	Date/Time: 05/27/2021
During the inspection, Mr. Dillon told me that the rags/wipes, contaminated with MEK, were disposed of into the trash dumpster just outside the galley. The trash is picked up by Alaska Waste and disposed of at the Kodiak Borough Landfill. The rags/wipes contaminated with MEK are an F-listed waste.	
Photo(s) 1. Observation Image-202105270927352735413791.jpg 2. Observation Image-202105270928102810448006.jpg 3. Observation Image-202105270928192819518973.jpg	

Building: Maintenance Shop	Contains CBI: No
Observation #: JJ1-OB-005	Date/Time: 05/27/2021
During my inspection of the maintenance shop, I saw four, quart size, containers of what Mr. Dillon said was waste ink, along with nine boxes, each containing six waste ink cartridges. The ink and ink cartridges are used in product labeling. At the time of the inspection, the boxes of ink were labeled as waste and three of the quart size containers were leaking. Mr. Dillon said the ink would be shipped down to their Arlington, WA facility for final disposal. Mr. Thatcher told me that the Arlington facility was a WA state SQG (federal VSQG). However, information contained in the facility's RCRA site detail report indicates the facility is not a generator. Information for the receiving facility is as follows: Arlington, WA EPA I.D.# WAH 00005 7800 OBI Seafoods Arlington 19405 68th Drive NE (Bldg B) Arlington, WA 98223 During the inspection, I requested a copy of the Safety Data Sheet (SDS) for Videojet makeup fluid and cartridges, and one was provided.	
Photo(s) Observation Image-20210527095505555441011.jpg Observation Image-202105270955175517448929.jpg Observation Image-202105270955315531450960.jpg Observation Image-202105270958545854429364.jpg	

Building: Oil Storage Van	Contains CBI: No
Observation #: JJ1-OB-003	Date/Time: 05/27/2021
While inspecting the Oil Storage Van, I saw four 55-gallon containers being used to accumulate the following four wastes: - used gasoline - used antifreeze - used solvent - used oil There was labeling on the wall behind and just above each container which indicated what each container held. However, at the time of the inspection, none of the 55-gal accumulation containers were labeled. Specifically, the 55-gal container being used to accumulate used oil was not labeled with the words, "Used Oil."	
Photo(s) Observation Image-20210527090930930407376.jpg Observation Image-20210527090959959356168.jpg Observation Image-202105270912141214337223.jpg Observation Image-202105270912261226338214.jpg Observation Image-202105270932323232357384.jpg	

Inspection Date(s):

05/27/2021 - 05/27/2021

Building: South end warehouse	Contains CBI: No
Observation #: JJ1-OB-001	Date/Time: 05/27/2021
I saw four, 55-gallon containers on a pallet that were wrapped with a band of cellophane that was labeled with the words, "Galley Dirty Oil." According to Mr. Dillon they held used cooking oil.	
Photo(s) 1. Observation Image-202105270846464646289742.jpg 2. Observation Image-202105270847294729253245.jpg 3. Observation Image-202105270847584758309983.jpg	

Records Review

Record: Shipping Documents/Tolling agreements		AOC: Yes
Ref #: JJ1-RR-001	Reviewed By: Jon Jones	Reviewed Date: 07/26/2021
I reviewed the bills of lading for the facility for the last several years for wastes that were shipped down to their Arlington, WA facility. The OBI Seafoods Kodiak Division is self-transporting their waste, by vessel, to another OBI facility that is not a large quantity generator. The OBI seafoods, LLC Arlington, WA facility (WAH000057800) is listed on their site detail report as a non-generator.		
Document(s) 1. 2.6.2018 BOL.pdf 2. 6.1.2018 BOL.pdf 3. 9.17.2017 BOL.pdf 4. 9.17.2017(2) BOL.pdf 5. 9.23.2019 BOL.pdf 6. 9.27.2019 BOL.pdf 7. 10.4.2019 BOL.pdf 8. 10.26.2020 BOL.pdf 9. 10.26.2020(2) BOL.pdf		

SECTION III – AREAS OF CONCERN

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

Building:	Area:	Sub-area:
JJ1-RR-001		
The OBI Seafoods Kodiak Division is self-transporting their waste, by vessel, to another OBI facility that is not a large quantity generator. The OBI seafoods, LLC Arlington, WA facility (WAH000057800) is	Citation:	Section:

Inspection Date(s):

05/27/2021 - 05/27/2021

listed on their site detail report as a non-generator.		
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Building: Fabrication forklift shop**Area:****Sub-area:****JJ1-OB-002**

While inspecting the contents of flammable storage cabinets, I saw some containers of MEK. I asked what the MEK was used for and Mr. Dillon said it was used for thinning paint and clean up. I asked if rags/wipes were used with the MEK and he told me they were, and the rags/wipes were disposed of as solid waste.

Citation:**Section:****Building:** Galley**Area:** Trash dumpster located just to the left of the galley entrance**Sub-area:****JJ1-OB-004**

During the inspection, Mr. Dillon told me that the rags/wipes contaminated with MEK were disposed of into the trash. The trash is picked up by Alaska Waste and disposed of at the Kodiak Borough Landfill. The rags/wipes contaminated with MEK are an F-listed waste.

Citation:**Section:****Building:** Maintenance Shop**Area:****Sub-area:****JJ1-OB-005**

During my inspection of the maintenance shop, I saw four, quart size containers of what Mr. Dillon said was waste ink, along with nine boxes, each containing six waste ink cartridges. The ink and ink cartridges are used in product labeling. At the time of the inspection, three of the quart size containers were leaking.

Mr. Dillon said the ink would be

Citation:**Section:**

Inspection Date(s):

05/27/2021 - 05/27/2021

shipped down to their Arlington, WA facility for final disposal. Mr. Thatcher told me that the Arlington facility was a WA state SQG (federal VSQG).		
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Building: Oil Storage Van**Area:****Sub-area:****JJ1-OB-003**

At the time of the inspection, the 55-gal container being used to accumulate used oil was not labeled with the words, "Used Oil."	Citation:	Section:
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SECTION IV – FOLLOW UP**Building:****Area:****Sub-area:****JJ1-AF-001**

Following the inspection, Mr. Thatcher sent me an email, dated 6/8/21, in which he provided photo documentation of containers that were labeled after the inspection. He also elaborated on the generation of off-spec gasoline and solvent at the facility.
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Building: Maintenance Shop**Area:****Sub-area:****JJ1-OB-005**

I requested a copy of the SDS for the waste Videojet makeup fluid and cartridges. A copy of the SDS was provided during 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 then explained the follow-up process that would take place after the inspection.

SECTION V – SAMPLING ACTIVITIES AND ANALYTICAL RESULTS

No sampling was conducted.

SECTION VI – LIST OF APPENDICES

Photo Log

[Title]	
Observation_Image-202105271019511951421272.jpg	
05/27/2021 10:19 AM (AKT)	
Jon Jones	
Cannery	
No CBI	
No PII	
View of three, quart size containers of waste ink seen here on a table in the cannery.	
[Title]	
Observation_Image-202105271019581958331812.jpg	
05/27/2021 10:19 AM (AKT)	
Jon Jones	
Cannery	
No CBI	
No PII	
Close-up view of the three, quart size containers of waste ink on a table in the cannery.	

Inspection Date(s):

05/27/2021 - 05/27/2021

[Title]

Observation_Image-
20210527102007207439341.jpg

05/27/2021 10:20 AM (AKT)

Jon Jones

Cannery

No CBI

No PII

Another view of the same three, quart size containers of waste ink seen here on a table in the cannery.



[Title]

Observation_Image-
202105270857185718495419.jpg

05/27/2021 08:57 AM (AKT)

Jon Jones

Fabrication forklift shop

No CBI

No PII

View of the MEK containers inside the flammable storage locker.



Inspection Date(s):

05/27/2021 - 05/27/2021

[Title]	
Observation_Image-202105270858105810433334.jpg	
05/27/2021 08:58 AM (AKT)	
Jon Jones	
Fabrication forklift shop	
No CBI	
No PII	
View of the red step can, where the waste rags/wipes, contaminated with MEK, are disposed as solid waste.	
[Title]	
Observation_Image-202105270858165816434646.jpg	
05/27/2021 08:58 AM (AKT)	
Jon Jones	
Fabrication forklift shop	
No CBI	
No PII	
View inside the red step can, showing that there were no rags/wipes in the step can at the time of the inspection.	

Inspection Date(s):

05/27/2021 - 05/27/2021

[Title]	
Observation_Image-202105270927352735413791.jpg	
05/27/2021 09:27 AM (AKT)	
Jon Jones	
Galley/Trash dumpster located just to the left of the galley entrance	
No CBI	
No PII	
View of the trash dumpster, just outside of the galley, where the rags/wipes, contaminated with MEK, have been disposed.	
[Title]	
Observation_Image-202105270928102810448006.jpg	
05/27/2021 09:28 AM (AKT)	
Jon Jones	
Galley/Trash dumpster located just to the left of the galley entrance	
No CBI	
No PII	
View of the labeling on the outside of the trash dumpster, indicating the only household garbage is acceptable.	

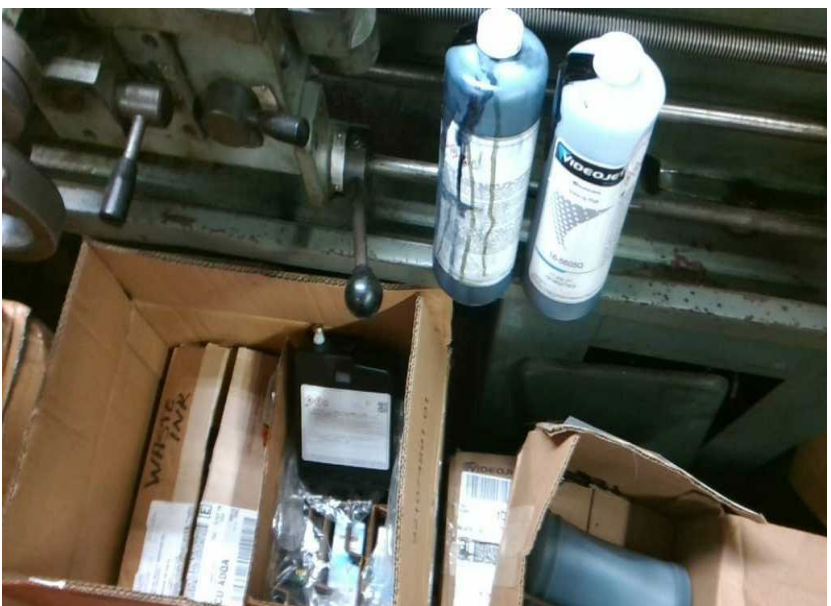
Inspection Date(s):

05/27/2021 - 05/27/2021

[Title]	
Observation_Image-202105270928192819518973.jpg	
05/27/2021 09:28 AM (AKT)	
Jon Jones	
Galley/Trash dumpster located just to the left of the galley entrance	
No CBI	
No PII	
View inside the trash dumpster.	
[Title]	
Observation_Image-20210527095505555441011.jpg	
05/27/2021 09:55 AM (AKT)	
Jon Jones	
Maintenance Shop	
No CBI	
No PII	
View of the containers and boxes of containers of waste ink.	

Inspection Date(s):

05/27/2021 - 05/27/2021

[Title] Observation_Image-202105270955175517448929.jpg 05/27/2021 09:55 AM (AKT) Jon Jones Maintenance Shop No CBI No PII View of the leaking waste ink containers.	
[Title] Observation_Image-202105270955315531450960.jpg 05/27/2021 09:55 AM (AKT) Jon Jones Maintenance Shop No CBI No PII Close-up view of the waste ink containers and cartridges.	

Inspection Date(s):

05/27/2021 - 05/27/2021

[Title] Observation_Image-202105270958545854429364.jpg 05/27/2021 09:58 AM (AKT) Jon Jones Maintenance Shop No CBI No PII View of the boxes that were labeled with the words, "Waste Ink."	
[Title] Observation_Image-20210527090930930407376.jpg 05/27/2021 09:09 AM (AKT) Jon Jones Oil Storage Van No CBI No PII View of the unlabeled containers inside the Oil Storage Van.	

Inspection Date(s):

05/27/2021 - 05/27/2021

[Title]	
Observation_Image-20210527090959959356168.jpg	
05/27/2021 09:09 AM (AKT)	
Jon Jones	
Oil Storage Van	
No CBI	
No PII	
View of the black, 55-gallon unlabeled used oil storage container.	
[Title]	
Observation_Image-202105270912141214337223.jpg	
05/27/2021 09:12 AM (AKT)	
Jon Jones	
Oil Storage Van	
No CBI	
No PII	
Another view of the 55-gal container being used to accumulate used oil, showing that it was not labeled with the words, "Used Oil."	

Inspection Date(s):

05/27/2021 - 05/27/2021

[Title]	
Observation_Image-202105270912261226338214.jpg	
05/27/2021 09:12 AM (AKT)	
Jon Jones	
Oil Storage Van	
No CBI	
No PII	
Another view of the 55-gal container being used to accumulate used oil, showing that it was not labeled with the words, "Used Oil."	
[Title]	
Observation_Image-202105270932323232357384.jpg	
05/27/2021 09:32 AM (AKT)	
Jon Jones	
Oil Storage Van	
No CBI	
No PII	
View of the Oil Storage Van.	

Inspection Date(s):

05/27/2021 - 05/27/2021

[Title]		
Observation_Image-202105270846464646289742.jpg		
05/27/2021 08:46 AM (AKT)		
Jon Jones		
South end warehouse		
No CBI		
No PII		
View of containers holding used cooking oil.		
[Title]		
Observation_Image-202105270847294729253245.jpg		
05/27/2021 08:47 AM (AKT)		
Jon Jones		
South end warehouse		
No CBI		
No PII		
Another view of the used cooking oil.		

Inspection Date(s):

05/27/2021 - 05/27/2021

[Title]	
Observation_Image-202105270847584758309983.jpg	
05/27/2021 08:47 AM (AKT)	
Jon Jones	
South end warehouse	
No CBI	
No PII	
Another view of the used cooking oil.	

Document Log

Document Type	Document Name	Contains CBI	Contains PII	Uploaded By	Date Received
Other - Safety Data Sheet	Videojet Make-up Fluid SDS.pdf	No	No	Jon Jones	07/26/2021
Other - Safety Data Sheet	Mineral Spirits 365 SDS.pdf	No	No	Jon Jones	07/26/2021
Other - Safety Data Sheet	MEK SDS.pdf	No	No	Jon Jones	07/26/2021
Records Review	2.6.2018 BOL.pdf	No	No	Jon Jones	07/26/2021
Records Review	6.1.2018 BOL.pdf	No	No	Jon Jones	07/26/2021
Records Review	9.17.2017 BOL.pdf	No	No	Jon Jones	07/26/2021
Records Review	9.17.2017(2) BOL.pdf	No	No	Jon Jones	07/26/2021
Records Review	9.23.2019 BOL.pdf	No	No	Jon Jones	07/26/2021
Records Review	9.27.2019 BOL.pdf	No	No	Jon Jones	07/26/2021
Records Review	10.4.2019 BOL.pdf	No	No	Jon Jones	07/26/2021
Records Review	10.26.2020 BOL.pdf	No	No	Jon Jones	07/26/2021
Records Review	10.26.2020(2) BOL.pdf	No	No	Jon Jones	07/26/2021
Facility Map	Facility drawing.pdf	No	No	Jon Jones	07/26/2021
Other - Seafood Processor Notice of Intent (NOI) form	OBI Kodiak_NOI_Signed 4.23.21.pdf	No	No	Jon Jones	07/26/2021
Inspection Reports	Field_Notes_AKD063376974v1.0.pdf	No	No	Jon Jones	07/26/2021