

REGION 10 Enforcement Division

INSPECTION REPORT

Inspection Date(s):	06/06/2022 - 06/06/2022	Announced: No	
Time:	Entry: 10:51 AM (AKT)	Exit: 12:24 PM (AKT)	
Program:	RCRA		
Regulatory Program(s):	Title 40 - ENVIRONMENTAL PROTECTION AGENCY		
If Access is Denied:			
Company Name:	Northern Oilfield Solutions, LLC		
Facility or Site Name:	Deadhorse Facility		
Facility/Site Physical Address:	1001 Airport Way		
(City, state, zip code)	Prudhoe Bay, AK 99734		
Type of Operation:	Fuel distribution and tank farm		
Size of Facility:	257,475 sq. Ft.		
Length of Facility at Location:	Since 1984		
Geographic Coordinates:	70.20026, -148.46481		
Mailing address: (Secondary Address)	Christina Bentz, REM®, C.P.G. Director of Environmental Affairs 450 Alaskan Way South, Suite 707 Seattle, WA 98104 christinab@nsenergy.com Direct: 907-265-3836		
(City, state, zip code)	Seattle, WA 98104		
Facility/Site Identifier:	AKD023254378		
Media Number:	N/A		
NAICS:	424710 - Petroleum Bulk Stations and Terminals		
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

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
Director of Environmental Affairs	Christina Bentz	(907) 265-3836	christinab@nsenergy.com	Yes	No
Operations Supervisor	Brian Graves	(907) 659-2840	brian.graves@nosi.com	Yes	Yes

Opening Conference

EPA Lead Inspector Jon Jones arrived at the Northern Oilfield Solutions, LLC at 10:51 AM (AKT) on 06/06/2022 for an inspection. I presented my credentials to Brian Graves and informed him that this was an EPA RCRA inspection. The table above presents all the inspection opening and closing conference participants.

Ms. Bentz joined by telephone and during the opening conference I told her that during my file review for the inspection, I identified that there were two EPA identification numbers for the site. I told Ms. Bentz that I had previously inspected the facility on July 10, 2017 under EPA identification number AKR 00000 4994. I explained that while reviewing the file, the address for EPA identification number AKD 02325 4378 was listed as Pouch 340043 which is a mail stop. I searched E-Manifest, using EPA identification number AKD 02325 4378 and saw that the generators address on the last hazardous waste manifest was listed as 1001 Airport Way, Prudhoe Bay, AK 99734. I told Ms. Bentz that I would have someone from EPA follow-up with her regarding the two EPA identification numbers for the same physical location. I was accompanied by Mr. Graves 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. 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

Northern Oilfield Solutions, LLC (facility) is a bulk fuel terminal located in an industrial area in Deadhorse, Alaska.

Facility Info

Number of employees	8 full-time and 4 contractors
Weather Conditions	Cold and windy
Operating Hours	7 days a week, 6:00 a.m. to 4:30 p.m.
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?	VSQG, verified by Mr. Graves

Process Description

I asked Mr. Graves about the facility's waste streams and he told me the following:

- Waste Ni-Cad and Lithium-ion batteries – managed as universal waste.
- Waste aerosols – Mr. Graves said that they were looking into taking their waste aerosols to the Oxbow landfill.
- Waste absorbents contaminated with gasoline are managed as hazardous waste (offered for transportation to US Ecology - formerly NRC).
- Waste absorbents contaminated with Jet A (diesel) are managed as solid waste and disposed of at the Oxbow landfill.

The shop was inaccessible at the time of the inspection due to a fire that occurred in 2019. According to Mr. Graves the shop building was deemed unsafe to enter.

Building(s)

Building/Area/Sub-area	Process Description	Area of Concern
Tank farm	Fuel storage	No
Tote Barn	Storage and SAA	No
Across from SAA		No

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

Building: Tote Barn	Contains CBI: No
Observation #: JJ1-OB-001	Date: 06/06/2022
At the time of the inspection, there was a 55-gallon container that held a mix of snow melt and gasoline from a gas spill incident that occurred 11/13/20. According to Mr. Graves the container was full. Mr. Graves was unsure what they planned to do with it. After talking with Ms. Bentz, Mr. Graves said the waste would be managed as non-regulated waste and go out for fuel blending.	
Photo(s) 1. IMG-20220606120222221057358.jpg 2. IMG-202206061203383381042275.jpg 3. IMG-20220606120358358659285.jpg 4. IMG-2022060612040646822473.jpg	

Records Review

The facility is a VSQG and no records were reviewed during the inspection.

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 Mr. Graves for his 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 Mr. Graves 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.

Following the Inspection

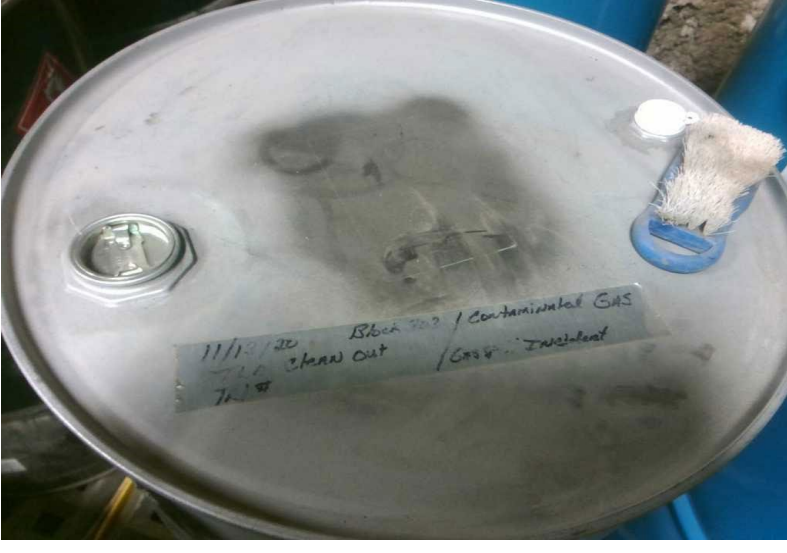
After the inspection, I sent an email to both Mr. Graves and Ms. Bentz on July 20, 2022. In that email, I stated, "During the inspection, it wasn't completely clear how your facility was managing waste aerosols. Can you follow-up with how your facility is managing this waste and please include a copy of any paperwork from the last time they were managed for disposal."

Ms. Bentz responded by email on July 21, 2022. In that email Ms. Bentz stated, "Thank you for including me in your question below. Northern Oilfield Solutions, LLC did not generate a lot of waste aerosols. The ones onsite that you observed were primarily generated in the last 12 months following discontinuing the use of a third-party service provider who was the main generator of waste aerosols. As the generator of the waste aerosols, the third-party took them with them and disposed of them as part of their process. Prior to that, the last disposal record we have is from 2016 (attached) when they were shipped offsite."

I replied to the email Ms. Bentz sent on July 21, 2022 asking, "How does your facility intend to manage the waste aerosols that were onsite during the inspection?"

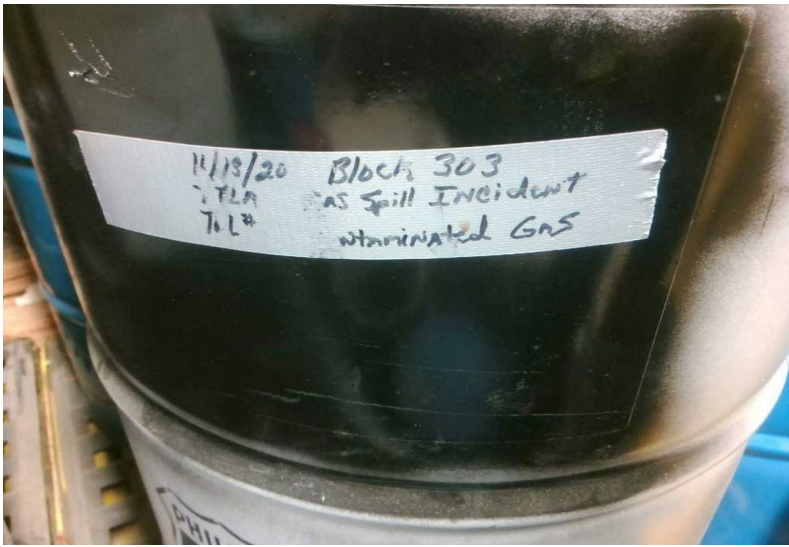
Ms. Bentz responded with an email on July 22, 2022 stating, "With the respect to the below, the facility was recently purchased by another entity and they have taken possession of the waste aerosols. It is my understanding that they have a puncturing station and have punctured them and will managing the empty containers and any liquid contents in accordance with federal waste regulations."

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

[Title] IMG-20220606120222221057358.jpg 06/06/2022 12:02 PM (AKT) Jon Jones Tote Barn No CBI No PII View of 55-gallon container, marked with a Phillips 66 logo, that held a mix of snow melt and gasoline from a gas spill incident that occurred 11/13/20.	
[Title] IMG-202206061203383381042275.jpg 06/06/2022 12:03 PM (AKT) Jon Jones Tote Barn No CBI No PII Close-up view of 55-gallon container, marked with a Phillips 66 logo, that held a mix of snow melt and gasoline from a gas spill incident that occurred 11/13/20.	
[Title] IMG-20220606120358358659285.jpg 06/06/2022 12:03 PM (AKT) Jon Jones Tote Barn No CBI No PII View of the top of the container.	

Inspection Date(s):

06/06/2022 - 06/06/2022

[Title]	
IMG-2022060612040646822473.jpg	
06/06/2022 12:04 PM (AKT)	
Jon Jones	
Tote Barn	
No CBI	
No PII	
View of the labeling on the container.	

Document Log

Document Type	Document Name	Contains CBI	Contains PII	Uploaded By	Date Received
Facility Map	NOS Block 301 Site Map.docx	No	No	Jon Jones	08/02/2022
Manifests	AKD 02325 4378 Man#008741313FLE.pdf	No	No	Jon Jones	08/02/2022
Manifests	2016_12_SCC - Non Hazardous Waste Disposal_Clean Harbors.pdf	No	No	Jon Jones	08/02/2022
Communications	RE_ RCRA Compliance Evaluation Inspection of June 6, 2022.pdf	No	No	Jon Jones	08/02/2022