

REGION 10 Enforcement Division

INSPECTION REPORT

Inspection Date(s):	03/08/2021 - 03/08/2021	Announced: No	
Time:	Entry: 09:40 AM (AKT)	Exit: 03:19 PM (AKT)	
Program:	RCRA		
Regulatory Program(s):	Title 40 - ENVIRONMENTAL PROTECTION AGENCY		
If Access is Denied:			
Company Name:	NRC Alaska, LLC		
Facility or Site Name:	NRC ALASKA		
Facility/Site Physical Address:	2020 VIKING DR		
(city, state, zip code)	ANCHORAGE, AK 99501		
Type of Operation:	Non-hazardous waste processing facility and 10-day Transfer Facility		
Size of Facility:	3 acres		
Length of Facility at Location:	Since 1998		
Geographic Coordinates:	61.223806, -149.842379		
Mailing address: (Secondary Address)	NRC Alaska 425 Outer Springer Loop Attn: Rick Reimer, Director of Operations & Compliance rick.reimer@usecology.com (907) 646-5083 CC: Cameron Flood, Operational Manager cameron.flood@usecology.com Shane Bookhout-O'Neill, Environmental Compliance Manager shane.oneill@usecology.com		
(city, state, zip code)	Palmer, AK 99645		
County:			
Facility/Site Identifier:	AKR000004184		
Media Number:	Unpermitted Facility		
NAICS:	562219 – Other Nonhazardous waste treatment and disposal		
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 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
Operational Manager	Cameron Flood	(907) 646-5014	cameron.flood@usecology.com	Yes	Yes
Environmental Compliance Manager	Shane Bookhout-O'Neill	(907) 646-5044	shane.oneill@usecology.com	Yes	Yes
Director of Operations	Rick Reimer	(907) 646-5083	rick.reimer@usecology.com	Yes	Yes

Opening Conference

EPA Lead Inspector Jon Jones arrived at NRC Alaska at 09:40 AM (AKT) on 03/08/2021 for an inspection. I presented my credentials to Cameron Flood and informed him that this was an EPA RCRA inspection. The table above presents all the inspection participants.

Facility/Site Description

According to Mr. Rick Reimer, the facility is a used oil and wastewater processor, as well as a used oil fuel marketer. The facility is also a used oil/hazardous waste transporter and a 10-day transfer facility.

Facility Info

Number of employees	13
Weather Conditions	Clear and cold
Operating Hours	7 am - 10 pm, Monday through Friday. Some weekends, depending on projects.
Safety Training Provided to Inspector(s)?	No
What type of generator facility notified?	LQG

What type of generator facility verified as?	Verified by Mr. Reimer to be a LQG.
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Process Description

The facility consists of a 12,000 square foot main processing building that contains administrative offices, raw material storage area, wastewater processing area, used oil processing area, used antifreeze processing, four hazardous waste satellite accumulation areas (SAAs), and a receiving area for incoming waste. No manufacturing or storage activities occur outside the building except for activities that take place on the loading dock and at the 10-day hazardous waste transfer area. There are a fifth hazardous waste SAA and an area sometimes used as a central accumulation area (CAA) on the loading dock. The area on the east side of the building consists of a receiving area for incoming waste and a loading area for processed fuels. The Viking facility utilizes a truck trailer at the loading dock as the 10-day hazardous waste transfer area.

Since the last inspection, the facility added a PFAS/PFOS treatment process., for which Alaska Department of Environmental Conservation issued a Temporary Industrial Discharge Permit, TIDP 2021-001. The permit became effective 1/11/21 and shall expire 12/31/2021. A copy of the permit was provided. Mr. Reimer provided flow diagrams for each of the processes at the facility.

The facility has an Industrial Wastewater Discharge Permit #6 that became effective December 1, 2018 and expires on November 30, 2023. A copy of the permit was provided.

Routine wastes generated at the facility include solidified tank bottoms contaminated with benzene (D018), drag reducing agent from tank cleaning operations (D001), oily sludge from tank bottoms contaminated with benzene (D018), aerosol cans (D003) and residue (D001), fluorescent lamps and batteries managed as universal waste, used oil, used oil filters, and used antifreeze.

At the time of the inspection, Mr. Reimer told me that NRC was purchased by US Ecology back in October/November 2020; however, he told me until it's finalized the following Owner/Operator information is still current:

Owner: Moriancumer, LLC, 5877 Dalton Circle, Palmer, AK 99645 (907) 748-7101

Operator: NRC Alaska, LLC, 425 Outer Springer Loop, Palmer, AK 99645

Additional information about NRC Alaska, LLC can be found on their website at nrcc.com.

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 universal waste and used oil management. Specifically, I inspected the following areas of the facility:

- Processing building
- 10-day Transfer area
- Central Accumulation Area (CAA)
- Tent #3

Building(s)

Building/Area	Process Description	Area of Concern
Process Building		Yes
Drum Washing Area		Yes
Outside (Southside)		Yes
Tent #3	Glycol and solid waste storage	Yes

SECTION II – OBSERVATIONS AND RECORDS REVIEW

Observations

Building: Process Building/Drum Washing Area	Contains CBI: No
Observation #: JJ1-OB-001	Date/Time: 03/08/2021
While in the drum washing area of the Processing building, I saw a 55-gallon container. The top of the container was marked with the words, "Thick Oil with Ammonia." I asked Mr. Flood how much oil the container held. Mr. Flood said the container held approximately 30 gallons of used oil. " The container was not labeled with the words "Used Oil." Mr. Flood labeled the container with the words "Used Oil" during the inspection.	
Photo(s) 1. Observation Image-202103081019431943364542.jpg 2. Observation Image-202103081019531953337473.jpg 3. Observation Image-20210308102004204329178.jpg 4. Observation Image-202103081028302830335236.jpg 5. Observation Image-202103081028382838272347.jpg	

Building: Process Building/Outside (Southside)	Contains CBI: No
Observation #: JJ1-OB-003	Date/Time: 03/08/2021
While inspecting the area outside the Process building, I saw a 300-gallon tote, located outside on the south side of the building. At the time of the inspection, the tote contained approximately 75 gallons of a dark liquid that looked like oil. Since it was not a new product container, I asked Mr. Flood if the liquid was used oil and he told me that it was used oil. The tote was not labeled with the words "Used Oil". Mr. Flood labeled the tote with the words "Used Oil" during the inspection.	
Photo(s) 1. Observation Image-202103081138113811275612.jpg 2. Observation Image-202103081138193819325235.jpg 3. Observation Image-202103081138313831298789.jpg 4. Observation Image-202103081140304030278266.jpg 5. Observation Image-202103081140394039230084.jpg	

Building: Tent #3	Contains CBI: No
Observation #: JJ1-OB-002	Date/Time: 03/08/2021

While inspecting Tent #3, I saw a box that contained 8-ft waste fluorescent lamps that, according to the labeling, the facility was managing as universal waste lamps. At the time of the inspection, the box containing universal waste lamps was not structurally sound since it had a large dent along one side that folded the cardboard side of the box inward.

Following the inspection, I received an email from the facility on March 9, 2021 that included photos of the repackaged lamps.

Photo(s)

1. [Observation Image-20210308110411411269581.jpg](#)
2. [Observation Image-20210308110429429245074.jpg](#)
3. [Observation Image-20210308110440440247490.jpg](#)

Records Review

Record: Manifests			AOC: Yes																																																								
Ref #: JJ1-RR-001	Reviewed By: Jon Jones	Reviewed Date: 05/05/2021 11:38 AM (AKT)																																																									
NRC Alaska, LLC is a 10-day hazardous waste transfer facility. While reviewing hazardous waste manifests for the years 2018, 2019, 2020 and 2021, I saw that the facility had stored hazardous waste on-site longer than 10 days on multiple occasions in 2018 and 2019. The following shipments exceeded the 10-day allotted time for a transfer facility: <table><tr><td><u>Manifest #</u></td><td><u>Date Received</u></td><td><u>Transfer of Custody Date</u></td><td><u># of days in storage</u></td></tr><tr><td>000299023FLE</td><td>12/18/17</td><td>01/05/18</td><td>18</td></tr><tr><td>004896500FLE</td><td>02/09/18</td><td>02/20/18</td><td>11</td></tr><tr><td>004885568FLE</td><td>06/18/18</td><td>06/29/18</td><td>11</td></tr><tr><td>004885569FLE</td><td>06/18/18</td><td>06/29/18</td><td>11</td></tr><tr><td>004896610FLE</td><td>07/30/18</td><td>08/15/18</td><td>16</td></tr><tr><td>004896611FLE</td><td>07/30/18</td><td>08/15/18</td><td>16</td></tr><tr><td>004896680FLE</td><td>11/13/18</td><td>11/25/18</td><td>12</td></tr><tr><td>002948665FLE</td><td>11/13/18</td><td>11/25/18</td><td>12</td></tr><tr><td>004897178FLE</td><td>11/13/18</td><td>11/25/18</td><td>12</td></tr><tr><td>004885624FLE</td><td>11/14/18</td><td>11/25/18</td><td>11</td></tr><tr><td>004897168FLE</td><td>11/14/18</td><td>11/25/18</td><td>11</td></tr><tr><td>004897169FLE</td><td>11/14/18</td><td>11/25/18</td><td>11</td></tr><tr><td>004897172FLE</td><td>11/14/18</td><td>11/25/18</td><td>11</td></tr></table>				<u>Manifest #</u>	<u>Date Received</u>	<u>Transfer of Custody Date</u>	<u># of days in storage</u>	000299023FLE	12/18/17	01/05/18	18	004896500FLE	02/09/18	02/20/18	11	004885568FLE	06/18/18	06/29/18	11	004885569FLE	06/18/18	06/29/18	11	004896610FLE	07/30/18	08/15/18	16	004896611FLE	07/30/18	08/15/18	16	004896680FLE	11/13/18	11/25/18	12	002948665FLE	11/13/18	11/25/18	12	004897178FLE	11/13/18	11/25/18	12	004885624FLE	11/14/18	11/25/18	11	004897168FLE	11/14/18	11/25/18	11	004897169FLE	11/14/18	11/25/18	11	004897172FLE	11/14/18	11/25/18	11
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004896722FLE	12/21/18	01/02/19	12
004896720FLE	12/21/18	01/02/19	12
004896721FLE	12/21/18	01/02/19	12
004896723FLE	12/21/18	01/02/19	12
004896724FLE	12/21/18	01/02/19	12
002948231FLE	12/19/18	01/02/19	14
002948229FLE	12/19/18	01/02/19	14
002948235FLE	12/19/18	01/02/19	14
002948237FLE	12/19/18	01/02/19	14
002948238FLE	12/19/18	01/02/19	14
004896728FLE	12/20/18	01/02/19	13
004896712FLE	12/20/18	01/02/19	13
004896715FLE	12/20/18	01/02/19	13
004896713FLE	12/20/18	01/02/19	13
004896732FLE	12/20/18	01/02/19	13
004896730FLE	12/20/18	01/02/19	13
004896733FLE	12/20/18	01/02/19	13
004896725FLE	12/20/18	01/02/19	13
004896714FLE	12/20/18	01/02/19	13
004896729FLE	12/20/18	01/02/19	13
004896710FLE	12/20/18	01/02/19	13
004896711FLE	12/20/18	01/02/19	13
004896736FLE	12/20/18	01/02/19	13
008741082FLE	12/19/19	12/30/19	11

Document(s)

1. 2018 shipment summary.pdf
2. 2019 shipment summary.pdf
3. 1 - 2018.pdf
4. 2 - 2018.pdf
5. 3 - 2018.pdf
6. 4 - 2018.pdf
7. 4 - 2018.pdf
8. 1 - 2019.pdf

Inspection Date(s):

03/08/2021 - 03/08/2021

9. 2 - 2019.pdf
10. 002948229FLE.pdf
11. 004896710FLE LDR.pdf
12. 004896711FLE.pdf
13. 004896713FLE.pdf
14. 004896714FLE.pdf
15. 004896722FLE.pdf
16. 004896724FLE.pdf
17. 004896728FLE.pdf
18. 004896732FLE.pdf
19. 004896736FLE.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																														
In 2018 and 2019 the following shipments exceeded the 10-day allotted time for a transfer facility: <table><thead><tr><th>Manifest #</th><th># days in storage</th></tr></thead><tbody><tr><td>000299023FLE</td><td>18</td></tr><tr><td>004896500FLE</td><td>11</td></tr><tr><td>004885568FLE</td><td>11</td></tr><tr><td>004885569FLE</td><td>11</td></tr><tr><td>004896610FLE</td><td>16</td></tr><tr><td>004896611FLE</td><td>16</td></tr><tr><td>004896680FLE</td><td>12</td></tr><tr><td>002948665FLE</td><td>12</td></tr><tr><td>004897178FLE</td><td>12</td></tr><tr><td>004885624FLE</td><td>11</td></tr><tr><td>004897168FLE</td><td>11</td></tr><tr><td>004897169FLE</td><td>11</td></tr><tr><td>004897172FLE</td><td>11</td></tr></tbody></table>	Manifest #	# days in storage	000299023FLE	18	004896500FLE	11	004885568FLE	11	004885569FLE	11	004896610FLE	16	004896611FLE	16	004896680FLE	12	002948665FLE	12	004897178FLE	12	004885624FLE	11	004897168FLE	11	004897169FLE	11	004897172FLE	11	Citation:	Section:
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004897172FLE	11																													
	Citation:	Section:																												

004896719FLE 12		
004896722FLE 12		
004896720FLE 12		
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004896724FLE 12		
002948231FLE 14		
002948229FLE 14		
002948235FLE 14		
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004896729FLE 13		
004896710FLE 13		
004896711FLE 13		
004896736FLE 13		
008741082FLE 11		

Building: Process Building**Area:** Drum Washing Area**Sub-area:****JJ1-OB-001**

I saw a 55-gallon container that held approximately 30 gallons of used oil. The container was not labeled with the words "Used Oil." Mr. Flood labeled the container with the words "Used Oil" during the inspection.	Citation:	Section:
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Building: Process Building**Area:** Outside (Southside)**Sub-area:****JJ1-OB-003**

I saw a 300-gallon tote that held approximately 75 gallons of used oil. The tote was not labeled with the words "Used Oil." Mr. Flood labeled the container with the words "Used Oil" during the inspection.	Citation:	Section:
--	------------------	-----------------

Building: Tent #3**Area:****Sub-area:****JJ1-OB-002**

I saw a box containing universal waste lamps that was not structurally sound. Mr. Flood repackaged the lamps after the inspection and Mr. Reimer sent an email on 3/9/21 that included photo documentation of the repackaged lamps.	Citation:	Section:
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SECTION IV – FOLLOW UP

All the actions taken by the facility that I observed are documented above.

Closing Conference

At the end of the inspection, I held a closing conference to discuss the areas of concern that were identified during the inspection. I explained the follow-up process that would take place after the inspection prior to departing the facility.

Mr. Reimer told me he would follow-up with an email providing requested documents and photo documentation showing that the universal waste lamps were repackaged. Mr. Reimer provided the information in an email dated March 9, 2021. This documentation is included with this report.

SECTION V – SAMPLING ACTIVITIES AND ANALYTICAL RESULTS

No sampling was conducted.

SECTION VI – LIST OF APPENDICES

Photo Log

[Title]	
Observation_Image-202103081019431943364542.jpg	
03/08/2021 10:19 AM (AKT)	
Jon Jones	
Process Building/Drum Washing Area	
No CBI	
No PII	
The container is not labeled with the words "Used Oil."	

[Title]

Observation_Image-
202103081019531953337473.jpg

03/08/2021 10:19 AM (AKT)

Jon Jones

Process Building/Drum Washing Area

No CBI

No PII

The container is not labeled with the words
"Used Oil."



[Title]

Observation_Image-
20210308102004204329178.jpg

03/08/2021 10:20 AM (AKT)

Jon Jones

Process Building/Drum Washing Area

No CBI

No PII

The container is not labeled with the words
"Used Oil."



[Title]

Observation_Image-
202103081028302830335236.jpg

03/08/2021 10:28 AM (AKT)

Jon Jones

Process Building/Drum Washing Area

No CBI

No PII

Mr. Flood labeled the container with the
words "Used Oil" during the inspection.



[Title]

Observation_Image-
202103081028382838272347.jpg

03/08/2021 10:28 AM (AKT)

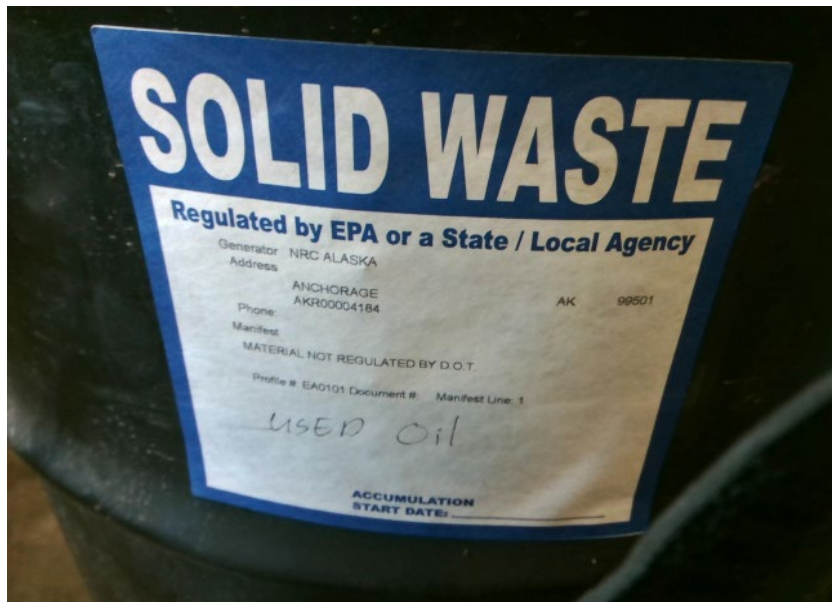
Jon Jones

Process Building/Drum Washing Area

No CBI

No PII

Mr. Flood labeled the container with the
words "Used Oil" during the inspection.



*[Title]*Observation_Image-
202103081138113811275612.jpg

03/08/2021 11:38 AM (AKT)

Jon Jones

Process Building/Outside (Southside)

No CBI

No PII

The tote is not labeled with the words "Used Oil."

*[Title]*Observation_Image-
202103081138193819325235.jpg

03/08/2021 11:38 AM (AKT)

Jon Jones

Process Building/Outside (Southside)

No CBI

No PII

The tote is not labeled with the words "Used Oil."



[Title]

Observation_Image-
202103081138313831298789.jpg

03/08/2021 11:38 AM (AKT)

Jon Jones

Process Building/Outside (Southside)

No CBI

No PII

The tote is not labeled with the words "Used
Oil."



[Title]

Observation_Image-
202103081140304030278266.jpg

03/08/2021 11:40 AM (AKT)

Jon Jones

Process Building/Outside (Southside)

No CBI

No PII

The tote was labeled during the inspection.



[Title]

Observation_Image-
202103081140394039230084.jpg

03/08/2021 11:40 AM (AKT)

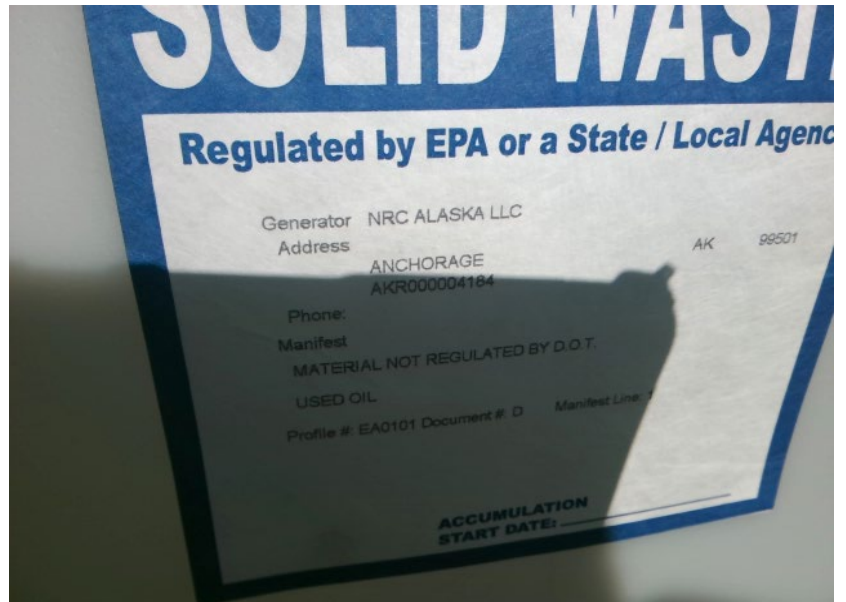
Jon Jones

Process Building/Outside (Southside)

No CBI

No PII

The tote was labeled during the inspection.



[Title]

Observation_Image-
20210308110411411269581.jpg

03/08/2021 11:04 AM (AKT)

Jon Jones

Tent #3

No CBI

No PII

Box containing universal waste lamps is not structurally sound.



[Title]	
Observation_Image-20210308110429429245074.jpg	
03/08/2021 11:04 AM (AKT)	
Jon Jones	
Tent #3	
No CBI	
No PII	
Box containing universal waste lamps is not structurally sound.	
[Title]	
Observation_Image-20210308110440440247490.jpg	
03/08/2021 11:04 AM (AKT)	
Jon Jones	
Tent #3	
No CBI	
No PII	
Box containing UW lamps is not structurally sound.	

Document Log

Document Type	Document Name	Contains CBI	Contains PII	Uploaded By	Date Received
Records Review	2018 shipment summary.pdf	No	No	Jon Jones	05/05/2021
Records Review	2019 shipment summary.pdf	No	No	Jon Jones	05/05/2021
Contingency Plan	2020 Viking Drive Contingency Plan May 2018.pdf	No	No	Jon Jones	05/06/2021
Process Description/Flow Diagram	NRC Antifreeze Processing Flow Chart.pdf	No	No	Jon Jones	05/06/2021

NRC ALASKA

Inspection Date(s):

03/08/2021 - 03/08/2021

Process Description/Flow Diagram	NRC Oil Treatment Flow Chart.pdf	No	No	Jon Jones	05/06/2021
Process Description/Flow Diagram	NRC Oily Mud Processing Flow Chart.pdf	No	No	Jon Jones	05/06/2021
Process Description/Flow Diagram	NRC PFAS Treatment Train 2 Flow Chart.pdf	No	No	Jon Jones	05/06/2021
Process Description/Flow Diagram	NRC Water Processing Flow Chart.pdf	No	No	Jon Jones	05/06/2021
Personnel Training	Training records.pdf	No	No	Jon Jones	05/06/2021
Other Media Program Permits	NRC Alaska AWWU Permit 2018-2023.pdf	No	No	Jon Jones	05/06/2021
Other Media Program Permits	01-Temp Indus Dis Permit TIDP 2021-001.pdf	No	No	Jon Jones	05/06/2021
Records Review	1 - 2018.pdf	No	No	Jon Jones	05/06/2021
Records Review	2 - 2018.pdf	No	No	Jon Jones	05/06/2021
Records Review	3 - 2018.pdf	No	No	Jon Jones	05/06/2021
Records Review	4 - 2018.pdf	No	No	Jon Jones	05/06/2021
Records Review	4 - 2018.pdf	No	No	Jon Jones	05/06/2021
Records Review	1 - 2019.pdf	No	No	Jon Jones	05/06/2021
Records Review	2 - 2019.pdf	No	No	Jon Jones	05/06/2021
Records Review	002948229FLE.pdf	No	No	Jon Jones	05/06/2021
Records Review	004896710FLE LDR.pdf	No	No	Jon Jones	05/06/2021
Records Review	004896711FLE.pdf	No	No	Jon Jones	05/06/2021
Records Review	004896713FLE.pdf	No	No	Jon Jones	05/06/2021
Records Review	004896714FLE.pdf	No	No	Jon Jones	05/06/2021
Records Review	004896722FLE.pdf	No	No	Jon Jones	05/06/2021
Records Review	004896724FLE.pdf	No	No	Jon Jones	05/06/2021
Records Review	004896728FLE.pdf	No	No	Jon Jones	05/06/2021
Records Review	004896732FLE.pdf	No	No	Jon Jones	05/06/2021
Records Review	004896736FLE.pdf	No	No	Jon Jones	05/06/2021
Inspection Reports	Field_Notes_AKR000004184v1.0.pdf	No	No	Jon Jones	05/06/2021