

REGION 10 Enforcement Division

INSPECTION REPORT

Inspection Date(s):	02/24/2022 - 02/24/2022	Announced: No	
Time:	Entry: 01:14 PM (AKT)	Exit: 02:09 PM (AKT)	
Program:	RCRA		
Regulatory Program(s):	Title 40 - ENVIRONMENTAL PROTECTION AGENCY		
If Access is Denied:			
Company Name:	Petro 49, Inc.		
Facility or Site Name:	Petro Marine Services Ketchikan		
Facility/Site Physical Address:	1100 Stedman St.		
(City, state, zip code)	Ketchikan, AK 99901		
Type of Operation:	Fuel Distribution Facility		
Size of Facility:	110,000 square feet, 220,000 with tank farm.		
Length of Facility at Location:	Approximately 100 years		
Geographic Coordinates:	55.33454, -131.62678		
Mailing address: (Secondary Address)	Mr. Kris Hall, Plant Manager 1100 Stedman St. Ketchikan, AK 99901 krish@petro49.com		
(City, state, zip code)	Ketchikan, AK 99901		
County:			
Facility/Site Identifier:	AKD000834846		
Media Number:	N/A		
NAICS:	424710 - PETROLEUM BULK STATIONS AND TERMINALS		
Lead Inspector:			
Jon Jones			
	REGION 10	Jones.Jon@epa.gov	(907) 271-6329
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
Cordova Terminal Manager	Mark Frohnapfel	(907) 424-4050	markf@shoresidepetroleum.com	Yes	Yes
Plant Manager	Kris Hall	(907) 225-2106	krish@petro49.com	Yes	Yes
Operations Manager	Wendell Pahang	(907) 225-2106	wendellp@petro49.com	No	Yes

Opening Conference

EPA Lead Inspector Jon Jones arrived at the Petro Marine Services Ketchikan at 01:14 PM (AKT) on 02/24/2022 for an inspection. I presented my credentials to Mr. Kris Hall, Plant Manager and informed him that this was an EPA RCRA inspection. The table above presents all the inspection participants.

When I arrived at the facility, I met with the receptionist at the front desk and announced my intention to conduct a RCRA compliance inspection at the facility. The receptionist asked me who I needed to see, and I told her that the point-of-contact (POC) I had for the facility was Randi Pickrell, Plant Manager. I told the receptionist that Randi Pickrell was the POC in 2014 and may or may not be the current POC. The receptionist had me sign the visitor log. The receptionist told me that she would let the Plant Manager, Kris Hall know I was on-site. Mr. Hall arrived shortly after my arrival and led me upstairs to a conference room where I held the opening conference.

Facility/Site Description

Fuel Distribution Facility and Tank Farm located in Ketchikan, AK. Additional information about the company can be found at: www.petromarineservices.com

Facility Info

Number of employees	30
Weather Conditions	Sunny and cool
Operating Hours	Monday through Saturday from 8:00 a.m. to 5:00 p.m. , dock is open Sunday from 8:00 a.m. to 5:00 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?	Mr. Hall verified that his facility was a VSQG.

Process Description

According to Mr. Hall, the following wastes are generated at the facility:

- Used oil - Burned in an onsite used oil burning space heater. If it can't be burned, due to being contaminated, it is managed through Full Cycle, LLC for recycling.
- Used antifreeze - Managed through Full Cycle for recycling.
- Oily absorbents - Burned in smart ash burner.
- Aerosols, batteries, and lamps are managed through the Household Hazardous Waste (HHW) facility at the local landfill.
- Automotive and Marine lead-acid batteries are sent to a recycler.

During the inspection of the facility on February 24, 2022, I was accompanied by Mr. Hall.

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.

Building(s)

Building/Area/Sub-area	Process Description	Area of Concern
Warehouse	Management and accumulation of used oil which is burned on-site in a used oil burning space heater.	Yes
Processing Room		Yes

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

Building: Warehouse/Processing Room	Contains CBI: No
Observation #: JJ1-OB-001	Date: 02/24/2022
Mr. Hall took me to an area in the facility warehouse that he referred to as the Processing room. The processing room is where the facility accumulates used oil in a variety of storage units. During the inspection, I saw a large tank that was located beneath the facility's used oil burning space heater. According to Mr. Hall the tank had a capacity of 300 gallons and was full. At the time of the inspection the tank was not labeled with the words "Used Oil." At the opposite end of the processing room, next to the entrance, I saw a large, black plastic spill catchment container, covered with a wire mesh that was also being used to accumulate used oil. According to Mr. Hall, it had a capacity of approximately 75 gallons. At the time of the inspection, the container held several gallons of used oil and was not labeled with the words 'Used Oil.' I told Mr. Hall that federal regulations required all used oil storage units to be labeled with the words "Used Oil" Mr. Hall had warehouse personnel label both the tank beneath the space heater and the spill catchment container with the words "Used Oil" during the inspection.	
Photo(s) 1. IMG-202202241349104910185730.jpg 2. IMG-202202241349184918132275.jpg 3. IMG-202202241349264926172253.jpg 4. IMG-202202241351295129186966.jpg 5. IMG-202202241351365136175949.jpg 6. IMG-202202241355375537187674.jpg 7. IMG-202202241355435543105755.jpg 8. IMG-202202241355555555203563.jpg 9. IMG-20220224135602562145143.jpg	

Records Review

Facility was verified as being a VSQG and no records were reviewed.

SECTION III – AREAS OF CONCERN

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

Building: Warehouse	Area: Processing Room	Sub-area:
JJ1-OB-001		
300-gallon used oil storage tank, beneath the used oil burning space heater, was not labeled with the words "Used Oil."	Regulation: 279.22(c)(1)	Sections:

Mr. Hall had facility personnel label the tank with the words "Used Oil" during the inspection.		
75-gallon used oil tote was not labeled with the words "Used Oil." Mr. Hall had facility personnel label the tote with the words "Used Oil" during the inspection.	Regulation: 279.22(c)(1)	Sections:

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 everyone for their time and cooperation during the inspection and began a review of the areas of concern (listed in Section III – Areas of Concern) that I observed during my inspection of the facility. I then explained the follow-up process that would take place once I finished the report. I explained to Mr. Hall that he would receive a copy of the report, as would a case officer. I told him the case officer would review the report to determine if any of the areas of concern identified in the report documented violations.

Following the Inspection

After leaving the facility, I received documentation from USDHS CG Base Ketchikan, a facility I had previously inspected in Ketchikan, AK on February 23-24, 2022, just prior to my inspection of Petro Marine Services. The documentation I received was a shipping paper related to the management of universal waste batteries. According to the documentation, USDHS CG Base Ketchikan had shipped universal waste batteries to Petro Marine Services on February 25, 2022.

I followed up with Mr. Hall to inquire as to why his facility was taking universal waste batteries from the Coast Guard Base next door. I sent an email to Mr. Hall in which I asked several questions about his facility managing universal waste batteries. Mr. Hall immediately responded by saying that was never an agreement they had and telling me that he had contacted the Coast Guard to have them come back and pick up the batteries. A copy of the email chain between me and Mr. Hall is an attachment to this report.

SECTION V – SAMPLING ACTIVITIES AND ANALYTICAL RESULTS - No sampling was conducted.

SECTION VI – LIST OF APPENDICES

Photo Log

[Title] IMG-202202241349104910185730.jpg 02/24/2022 01:49 PM (AKT) Jon Jones Warehouse/Processing Room No CBI No PII View of 300-gallon used oil storage tank, beneath the used oil burning space heater, that was not labeled with the words “Used Oil.”	
[Title] IMG-202202241349184918132275.jpg 02/24/2022 01:49 PM (AKT) Jon Jones Warehouse/Processing Room No CBI No PII View of 300-gallon used oil storage tank, beneath the used oil burning space heater, that was not labeled with the words “Used Oil.”	
[Title] IMG-202202241349264926172253.jpg 02/24/2022 01:49 PM (AKT) Jon Jones Warehouse/Processing Room No CBI No PII View of 300-gallon used oil storage tank, beneath the used oil burning space heater, that was not labeled with the words “Used Oil.”	

[Title]
IMG-202202241351295129186966.jpg
02/24/2022 01:51 PM (AKT)
Jon Jones
Warehouse/Processing Room
No CBI
No PII
View of 75-gallon used oil tote that was not labeled with the words "Used Oil."



[Title]
IMG-202202241351365136175949.jpg
02/24/2022 01:51 PM (AKT)
Jon Jones
Warehouse/Processing Room
No CBI
No PII
View of 75-gallon used oil tote that was not labeled with the words "Used Oil."



[Title]
IMG-202202241355375537187674.jpg
02/24/2022 01:55 PM (AKT)
Jon Jones
Warehouse/Processing Room
No CBI
No PII
View of 300-gallon used oil storage tank, after being labeled with the words "Used Oil" during the inspection.



[Title] IMG-202202241355435543105755.jpg 02/24/2022 01:55 PM (AKT) Jon Jones Warehouse/Processing Room No CBI No PII Close-up view of the label on the 300-gallon used oil storage tank.	
[Title] IMG-202202241355555555203563.jpg 02/24/2022 01:55 PM (AKT) Jon Jones Warehouse/Processing Room No CBI No PII View of 75-gallon used oil tote, after being labeled with the words "Used Oil" during the inspection.	
[Title] IMG-20220224135602562145143.jpg 02/24/2022 01:56 PM (AKT) Jon Jones Warehouse/Processing Room No CBI No PII Close-up view of the label on the 75-gallon used oil tote.	

Inspection Date(s):

02/24/2022 - 02/24/2022

Document Log

Document Type	Document Name	Contains CBI	Contains PII	Uploaded By	Date Received
Facility Map	Site Map.pdf	No	No	Jon Jones	03/16/2022
Communications	RE_ Universal Waste Batteries.pdf	No	No	Jon Jones	03/16/2022