

REGION 10 Enforcement Division

INSPECTION REPORT

Inspection Date(s):	06/16/2021 - 06/17/2021	Announced: No	
Time:	Entry: 07:29 AM (AKT)	Exit: 03:30 PM (AKT)	
Program:	RCRA		
Regulatory Program(s):	Title 40 - ENVIRONMENTAL PROTECTION AGENCY		
If Access is Denied:			
Company Name:	Hilcorp North Slope, LLC		
Facility or Site Name:	HILCORP NORTH SLOPE PRUDHOE BAY UNIT		
Facility/Site Physical Address:	PRUDHOE BAY UNIT		
(City, state, zip code)	PRUDHOE BAY, AK 99734		
Type of Operation:	Crude oil production field		
Size of Facility:	213,543 acres		
Length of Facility at Location:	Since the 1960's		
Geographic Coordinates:	70.293892, -148.704274		
Mailing address: (Secondary Address)	Mr. Chuck Wheat, Waste Program Lead Hilcorp Alaska, LLC 3800 Centerpoint Drive, Suite 1400 Anchorage, AK 99503 cwheat@hilcorp.com CC: Matt Laskey/Vic Farris AlaskaNS-PB-WasteCoord@hilcorp.com Jeff Shannon/Shane Umatum AlaskaNS-PB-WasteTech@hilcorp.com		
(City, state, zip code)	Anchorage, AK 99503		
County:			
Facility/Site Identifier:	AKD000643239		
Media Number:	Permitted Facility		
NAICS:	211120 - CRUDE PETROLEUM EXTRACTION		
Lead Inspector:			
Jon Jones	Jones, Jon	Digitally signed by Jones, Jon Date: 2021.09.23 08:46:24 -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: 2021.09.23 10:53:40 -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 the facility's RCRA permit, as well as the 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
Hazardous Waste Coordinator	Matt Laskey	(907) 659-4810	AlaskaNS-PB-WasteCoord@hilcorp.com	Yes	Yes
Alaska North Slope-Prudhoe Bay-Waste Technician	Jeff Shannon	(907) 659-4705	AlaskaNS-PB-WasteTech@hilcorp.com	Yes	Yes
Waste Program Lead	Chuck Wheat	(907) 777-8556	cwheat@hilcorp.com	No	Yes
Prudhoe Bay West Environmental Specialist	Omar Ramirez	(907) 659-4789	alaskans-pbw-envirospec@hilcorp.com	No	Yes
Prudhoe Bay West Environmental Specialist	Eric Van Dongen	(907) 659-4789	alaskans-pbw-envirospec@hilcorp.com	No	Yes

Opening Conference

EPA Lead Inspector Jon Jones arrived at the HILCORP NORTH SLOPE PRUDHOE BAY UNIT at 07:29 AM (AKT) on 06/16/2021 for the inspection. I presented my credentials to Mr. Matt Laskey and informed him that this was an EPA RCRA inspection. The table above presents all the inspection opening and closing conference 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. I also observed the facility's universal waste and used oil management.

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

Facility/Site Description

Hilcorp North Slope Prudhoe Bay Unit (hereafter referred to as Hilcorp or facility) is a crude oil production field located on the North Slope of Alaska, just north of Deadhorse, AK, with no nearby residential or other non-commercial properties.

Facility Info

At the time of the inspection, the owners and operator of the facility were:

Owner

State of Alaska
Department of Natural Resources
3700 Airport Way
Fairbanks, AK 99709

Owner and Operator

Hilcorp North Slope, LLC
3800 Centerpoint Drive, Suite 1400
Anchorage, AK 99503

According to facility personnel, the Hilcorp North Slope Prudhoe Bay Unit operates North Slope oil fields and pipelines with a gross production rate of approximately 520,000 barrels of oil equivalent per day. The Prudhoe Bay Unit consists of a West Operating Area and an East Operating Area. These areas have Satellite Accumulation Areas for hazardous wastes, non-hazardous wastes, universal wastes, and recyclable materials. A list of these SAA/UAA/RAA locations is included in the document log.

Process Description

The Hilcorp North Slope Prudhoe Bay Unit is a Large Quantity Generator (LQG) of hazardous waste, a large quantity handler of universal waste, and a permitted hazardous waste storage facility. The facility is not a commercial storage facility; the permit was issued so that Hilcorp could store the waste they generate for more than 90 days. The permit in effect at the time of this inspection was the administratively-continued 2009 Hazardous Waste Management Facility Standardized Permit and a new standardized RCRA permit will go into effect on September 30, 2021.

Changes since the last inspection:

- Upgraded fire suppression system in the Hazardous Waste Process Facility (HWPF) RCRA storage unit
- Removed the white hazardous waste storage bins - the bins were removed due to their fire suppression systems being old and outdated.
- Company ownership change - BPXA to Hilcorp NS, LLC on July 1, 2020

Hilcorp NS, LLC has not made a waste determination on leather gloves – Mr. Shannon stated that he sometimes sees waste leather gloves comingled with solvent rags. He told me that the facility issues approximately 2,500 pairs of leather gloves annually.

Building(s)

Building/Area/Sub-area	Process Description	Area of Concern
ACS WOA shop	Satellite Accumulation Area (SAA)	No
Base Operations Center (BOC)	SAA	No
C Pad Warehouse	SAA	No

Central Compression Plant-CCP	SAA	No
Central Gas Facility (CGF)	SAA	No
Central Power Station (CPS)	SAA	Yes
Hallway 128	SAA	Yes
Field Operations Complex (FOC)	General maintenance shop	No
Halon shop	SAA	No
Maintenance shop	SAA	No
Flow Station 3	SAA	No
Gathering Center 3 (GC3)	SAA	Yes
Skid 7	Maintenance Mod	Yes
Hazardous Waste Process Facility (HWPF)	Permitted hazardous waste storage unit.	Yes
Hover craft hangar	Houses hovercraft used for transportation to Northstar, another Hilcorp production facility.	Yes
Kakivik Warehouse	Tool room	No
Entry way SAA	SAA	No
Lisburne Production Facility -LPF	SAA	No
MCC Clinic	SAA	No
MCC Kitchen	SAA	No
MCC Wing 12- Room 112	SAA	No
Mukluk Pad (Central Dispatch)	Dispatch vehicles and heavy equipment for various projects.	No
Entry way SAA - North entrance door	SAA	No
STP	SAA	No
U11 - I&E	Instrumentation and Electrical SAA	Yes
U-11 Scaffold Shop	SAA	No
U-13	Light equipment shop SAA	No
U-21	Excavation Shop SAA	No
U5A CPS T&D Shop	Transmission and distribution SAA	No

SECTION II – OBSERVATIONS AND RECORDS REVIEW

Observations

Building: C Pad Warehouse	Contains CBI: No
Observation #: JJ1-OB-029	Date: 06/17/2021
While at the C Pad Warehouse, I saw a board that was used to display the various work gloves that are issued to Hilcorp workers at the North Slope facility. At the time of the inspection, there were several styles of gloves that were leather and some that contained leather parts. According to Mr. Shannon there has been no waste determination made for the waste leather gloves that are generated when worn out or damaged.	

Photo(s)

1. [Observation Image-202106171154225422547221.jpg](#)

Building: Central Power Station (CPS)/Hallway 128 **Contains CBI:** No

Observation #: JJ1-OB-008

Date: 06/16/2021

While inspecting the SAA, I saw a yellow poly step-can that was labeled to identify that it held lead acid batteries for recycling. Upon further inspection, I saw that the container held three NiCad batteries, used in battery operated power tools, and a fluorescent light ballast that contained a NiCad battery. There were also four small Duracell lithium batteries and three C size alkaline batteries.

The NiCad and lithium batteries were not labeled as universal waste. Mr. Shannon removed the batteries from the container during the inspection, repackaged them, and labeled the new container during the inspection.

Photo(s)

1. [Observation Image-202106161128262826387974.jpg](#)
2. [Observation Image-202106161128462846450711.jpg](#)
3. [Observation Image-202106161130443044455528.jpg](#)
4. [Observation Image-202106161133373337347511.jpg](#)
5. [Observation Image-202106161133413341355342.jpg](#)
6. [Observation Image-20210616113406346440371.jpg](#)
7. [Observation Image-20210616114509459275790.jpg](#)

Building: Gathering Center 3 (GC3)/Skid 7 **Contains CBI:** No

Observation #: JJ1-OB-007

Date: 06/16/2021

While inspecting the maintenance mod I saw a red step-can that was labeled, "Hazardous Waste - Solvent rags." The step-can was being utilized as a SAA container for solvent rags. At the time of the inspection, the container lid was not making a complete seal with the container when closed. This is a common problem when using step-cans. When we opened the lid to see what was inside, I saw that it contained waste aerosols. The hazard indicator was a Department of Transportation (DOT) Class 9 N.O.S. label for solvent rags instead of a Class 3 ignitable hazard indicator. Upon further inspection I saw a few waste rags inside the container and approximately 20- 25 waste aerosol cans.

Mr. Shannon removed the waste aerosol cans from the waste solvent rags SAA and placed them inside of the waste aerosol SAA, that was located just upstairs, during the inspection.

Photo(s)

1. [Observation Image-202106161057515751622588.jpg](#)
2. [Observation Image-20210616105801581575592.jpg](#)
3. [Observation Image-202106161058125812634093.jpg](#)
4. [Observation Image-20210616110533533418969.jpg](#)
5. [Observation Image-20210616110539539430112.jpg](#)

Building: Hazardous Waste Process Facility (HWPf) **Contains CBI:** No

Observation #: JJ1-OB-001

Date: 06/16/2021

While inspecting the HWPf, I saw a 55-gallon container located in the area on the floor adjacent to storage area CS-5 and just beneath Pallet 08. The container had a label on it that was marked with the words "Non-Hazardous Waste." The label had an additional description of, "PCB CAP/BAL (LIQ & SOLID), it was dated 6/13/21 and the MR# 61649, and it was also marked with the words, "Caution Contains PCBs." Another label

on the container also stated "Caution – Contains PCBs." According to the HWPF inventory log the container held PCB ballast/capacitor/trans Liquid & Solid. The inventory listed a profile number, CH610356. I asked Mr. Laskey for a copy of the profile and he said he would email it to me. The waste profile is included in the document log.

Photo(s)

1. [Observation Image-20210616090650650353432.jpg](#)
2. [Observation Image-2021061609070070292003.jpg](#)
3. [Observation Image-20210616090711711296547.jpg](#)

Building: Hazardous Waste Process Facility (HWPF) **Contains CBI:** No

Observation #: JJ1-OB-002

Date: 06/16/2021

At the time of the inspection, while in the HWPF, I saw an 85-gallon overpack drum with a drum ring that was not fully closed. According to the labeling on the overpack, it held "PAINT AND THINNERS/FUEL W/EMPTY AEROSOLS." According to Mr. Laskey, they overpack all of their hazardous waste liquids and this container held aerosol can residues. He said that the containers holding the aerosol can residue have vented bung caps installed to relieve any pressure. He said that just prior to being shipped, the overpack lids are closed with a lid that has a plastic bung installed so that, if needed, the pressure can be relieved by the transporter while the container is in transit. There were two of these overpacks that contained the same waste and had these venting valves.

Photo(s)

1. [Observation Image-202106160937393739498106.jpg](#)
2. [Observation Image-202106160937543754521633.jpg](#)
3. [Observation Image-20210616093809389533492.jpg](#)

Building: Hazardous Waste Process Facility (HWPF) **Contains CBI:** No

Observation #: JJ1-OB-003

Date: 06/16/2021

At the time of the inspection, I observed a second container that held PCB ballasts for incineration.

Photo(s)

1. [Observation Image-202106160942154215427325.jpg](#)
2. [Observation Image-202106160942254225341397.jpg](#)
3. [Observation Image-202106160942374237476915.jpg](#)

Building: Hazardous Waste Process Facility (HWPF) **Contains CBI:** No

Observation #: JJ1-OB-004

Date: 06/16/2021

While in the HWPF I observed that the facility was now using spill pallets as secondary containment since removal of the large white storage bins.

Photo(s)

1. [Observation Image-20210616094702472413242.jpg](#)
2. [Observation Image-202106160947224722449135.jpg](#)
3. [Observation Image-202106160948234823504508.jpg](#)

Building: Hazardous Waste Process Facility (HWPF) **Contains CBI:** No

Observation #: JJ1-OB-005

Date: 06/16/2021

While still inspecting the HWPF, I documented the condition of the floor with photographs.

Photo(s)

1. [Observation Image-20210616095107517253744.jpg](#)
2. [Observation Image-202106160951185118299737.jpg](#)
3. [Observation Image-202106160951585158301192.jpg](#)
4. [Observation Image-202106160954425442489055.jpg](#)
5. [Observation Image-202106160954525452392391.jpg](#)
6. [Observation Image-20210616095508558375723.jpg](#)

Building: Hazardous Waste Process Facility (HWPF) **Contains CBI:** No

Observation #: JJ1-OB-006

Date: 06/16/2021

There were several areas where it looked as though there was some damage to the coating on the floor of the HWPF. Mr. Laskey said it looked as though there was still some coating underneath some of the damaged areas; however, I observed that concrete was visible in the smaller of two holes, as shown in photograph # (you need to figure out which photo this is since the title is missing in the photo log, but it's the 5th photo in the lineup so probably 6880) . The size of the smaller hole in the coating was approximately the size of a quarter.

I observed another tear in the coating adjacent to the CS-4 pallet which contained drums holding waste corrosives-basic. Mr. Laskey viewed the tear in the coating and commented that there was exposed concrete beneath the tear. There was another area right next to the tear where one of the storage bins used to be bolted down to the floor, just between pallets CS-3 and CS-4, both holding containers of waste corrosives-basic. Some of the pins that anchored the cabinets to the floor had been ripped out of the floor, revealing obvious damage to the floor seal as well as the concrete.

Photo(s)

1. [Observation Image-202106160959415941279540.jpg](#)
2. [Observation Image-202106160959515951198827.jpg](#)
3. [Observation Image-2021061610000606184498.jpg](#)
4. [Observation Image-2021061610030636257993.jpg](#)
5. [Observation Image-20210616100314314236880.jpg](#)
6. [Observation Image-20210616100747747355172.jpg](#)
7. [Observation Image-20210616100756756228932.jpg](#)
8. [Observation Image-20210616100812812266328.jpg](#)
9. [Observation Image-20210616101402142329651.jpg](#)
10. [Observation Image-202106161014111411312595.jpg](#)
11. [Observation Image-202106161014241424383048.jpg](#)

Building: Hover craft hangar

Contains CBI: No

Observation #: JJ1-OB-022

Date: 06/17/2021

While inspecting the hover craft hanger, I saw a gray cabinet that was marked as a waste aerosol SAA and a universal waste (UAA) accumulation area. I opened the cabinet and saw four waste aerosol containers on the middle shelf, next to a container that was labeled, "Aerosol cans only" and "Return to Hovercraft."

The four waste aerosol cans were not containerized, not labeled as hazardous waste (HW), and were not marked with a hazard indicator. The facility manages aerosols as hazardous waste rather than universal waste.

The container that was labeled "Aerosol cans only" and "Return to Hovercraft" was adjacent to the waste

aerosol cans and was empty. I saw that the other side of the container was labeled as HW and had hazard indicators for both Flammable and Non-flammable gases. Mr. Shannon placed the waste aerosol cans into the container during the inspection.

According to Mr. Shannon, the Operators in Charge (OICs) at the hovercraft Hangar were contractors with Northern Energy Services (NES) and had been trained in hazardous waste management, but other NES employees (Ken Dassel, Rachelle Dabling) at the Hovercraft Hangar have not had any training.

Photo(s)

1. [Observation Image-202106170850335033499900.jpg](#)
2. [Observation Image-20210617085104514443072.jpg](#)
3. [Observation Image-202106170851235123385017.jpg](#)
4. [Observation Image-20210617090631631336754.jpg](#)

Building: Hover craft hangar**Contains CBI:** No**Observation #:** JJ1-OB-023**Date:** 06/17/2021

While still inspecting the contents of the gray cabinet, in the hovercraft hangar, I also saw seven waste lithium batteries on the top shelf. The waste batteries were not labeled as UW batteries.

Mr. Shannon placed the lithium batteries in a UW container during the inspection.

Photo(s)

1. [Observation Image-202106170856275627455200.jpg](#)
2. [Observation Image-202106170856545654273695.jpg](#)
3. [Observation Image-202106170857215721386730.jpg](#)
4. [Observation Image-20210617090024024358939.jpg](#)
5. [Observation Image-20210617090831831401558.jpg](#)

Building: Hover craft hangar**Contains CBI:** No**Observation #:** JJ1-OB-024**Date:** 06/17/2021

While still inspecting the hovercraft hangar, I saw a 250-gallon steel tote. I asked what was in the tote and Mr. Shannon asked Mr. Dassel about the contents of the tote. Mr. Dassel said he thought they were using it as a used oil storage tote.

The facility operator, Luke Niemela, Onshore Operator who works for NES, arrived onsite while we were there and confirmed that the tote held used oil. The tote that contained used oil was not labeled with the words "Used Oil." Mr. Niemela labeled the tote, with the words "Used Oil," during the inspection.

Photo(s)

1. [Observation Image-202106170917281728516202.jpg](#)
2. [Observation Image-202106170917391739515316.jpg](#)
3. [Observation Image-20210617091801181413216.jpg](#)
4. [Observation Image-202106170922332233432400.jpg](#)

Building: MCC Clinic**Contains CBI:** No**Observation #:** JJ1-OB-033**Date:** 09/22/2021

While inspecting the clinic, I observed waste that was being accumulated in the clinic SAA. During a file review, prior to the inspection, I saw that the facility had not notified as being a healthcare facility, in accordance with

the Subpart P regulations. I asked clinic personnel how hazardous waste and hazardous waste pharmaceuticals were being managed at the facility and I was told that any hazardous wastes generated at the clinic was being managed as hazardous waste and taken to the facility's HWPF. Clinic personnel told me that nothing is managed through a reverse distributor. I brought this up at the closing conference and following the inspection, Mr. Wheat submitted a new notification form 8700-12 with the updated information. Mr. Wheat sent an email to me, dated 8/24/21, which stated "Please see an updated submission to EPA that addressed the medical facilities within the Prudhoe Bay Unit. This information was submitted via the EPA's RCRA Info web page. As you noted, the "box" was missed during the biennial report that was submitted by BPXA (previous Operator) in the 2019."

Document(s)

1. AKD000643239_Update.pdf
2. Hilcorp HWPF.pdf

Building: U11 - I&E**Contains CBI:** No**Observation #:** JJ1-OB-012**Date:** 06/16/2021

While inspecting the UAA, I saw an open container of UW lamps. At the time of the inspection, the lid was not placed on the container properly and was cock-eyed, leaving an open gap at the top of the container. Mr. Shannon closed the container during the inspection.

Photo(s)

1. [Observation Image-20210616130857857509771.jpg](#)
2. [Observation Image-20210616130924924381186.jpg](#)
3. [Observation Image-20210616130952952327088.jpg](#)
4. [Observation Image-20210616131205125250511.jpg](#)

Records Review**Record:** Contingency Plan**AOC:** Yes**Ref #:** JJ1-RR-001**Reviewed By:** Jon Jones**Reviewed Date:** 08/19/2021

The contingency plan was emailed to me on the first day of the inspection, June 16, 2021. I reviewed the facility's hazardous waste contingency plan following the inspection and discovered that personnel that have retired (Larry Raburn, retired July 2020) is still listed as an alternate emergency coordinator. Mr. Raburn was once one of the waste coordinators at the facility. The revision date of the contingency plan was 7/25/2020.

At the time of the inspection, Mr. Laskey, who had previously been a waste technician, had moved into Mr. Raburn's position as the new waste coordinator and Mr. Shannon had been hired as the new waste technician.

Mr. Shannon was not listed in the contingency plan as the alternate emergency coordinator and Mr. Laskey was still listed in the plan as the waste technician.

Document(s)

1. Prudhoe Bay Unit RCRA Contingency Plan.docx

Record: Personnel Training**AOC:** Yes**Ref #:** JJ1-RR-002**Reviewed By:** Jon Jones**Reviewed Date:** 08/19/2021

Following the inspection, I reviewed the training records for OIC's at the various SAA, UAA, and Recycling Accumulation Area (RAA) locations. As per the training provided by the facility, SAA, UAA, and RAA OIC's have the option of taking their wastes to the Hilcorp Central Accumulation Area (CAA)/HWPF. Since OIC's can, and sometimes do, take their wastes to the CAA/HWPF, they are required to take applicable annual hazardous waste training.

While reviewing the training records for 73 SAA, UAA, and RAA locations, I saw that there were only 15 locations in which OIC training was current and up to date. I saw that there were 38 SAA, UAA, and RAA locations which showed that OIC training had expired. I also saw 20 SAA, UAA, and RAA locations which showed that alternate OIC's training had expired.

Document(s)

1. 2021 SAA Log 6-16-21.pdf
2. BPXA GPB OIC Training Archive.pdf
3. Hilcorp OIC Training Log 6-16-21.pdf
4. Hilcorp Waste Accumulation Area Training (SAA.RAA.UAA) - FINAL.pptx
5. SAA Training Report.xlsx
6. Training Records for employees bringing us waste.pdf

Record: Inspections**AOC:** Yes**Ref #:** JJ1-RR-003**Reviewed By:** Jon Jones**Reviewed Date:** 09/08/2021

During the inspection, I reviewed the facility's weekly inspection logs and saw that the facility was not inspecting the integrity of the sealed concrete floor in the HWPF. There were several areas on the HWPF floor where the seal on the concrete floor had been damaged and were showing the bare concrete. There were also several areas on the HWPF floor that were damaged when the hazardous waste storage cabinets were removed. Some of the pins that anchored the cabinets to the floor had been ripped out of the floor, revealing obvious damage to the floor seal as well as the concrete. According to annotations on the weekly inspection log, floor integrity was not being checked/inspected prior to the 6/16/21 RCRA CEI.

Document(s)

1. Weekly HWPF inspection logs 210908102608_0001.pdf

Record: Personnel Training**AOC:** Yes**Ref #:** JJ1-RR-004**Reviewed By:** Jon Jones**Reviewed Date:** 09/08/2021

Following the inspection, I reviewed the training records for both Matt Laskey and Vic Farris, the HW Coordinators, as well as Shane Umatum and Jeff Shannon, the HW Technicians. During this review of the training records, I saw that Mr. Shannon had RCRA training in June of 2020. I also saw that the RCRA training for Messrs. Laskey, Farris and Umatum had lapsed. The training records provided indicated that the last training was received on the following dates:

- Matt Laskey 2/28/20 (RCRA Basic & Advanced training)
- Vic Farris 2/28/20 (RCRA Basic & Advanced training)
- Shane Umatum 2/28/20 (RCRA Basic & Advanced training)

When I contacted the facility to discuss this area of concern regarding the training, Mr. Farris provided me with additional information and documentation. Mr. Farris indicated that the facility's contingency plan was

reviewed, along with the waste analysis plan, SAA/UAA/RAA procedures, emergency response plan and HWPF procedures, and as such counts as annual RCRA training. The email chains and documentation indicate this was a review of the information to ensure that references made to BPXA were changed to Hilcorp NS, LLC as opposed to a review for training purposes. The information was not provided with the initial training documentation and was not logged in as training in their training spreadsheet. The document review information provided by Mr. Farris is included in the document log.

Document(s)

1. BPXA Training History - Farris, Laskey, Shannon, Umatum.xlsx
2. Corrected Facility Training Records.pdf
3. Hilcorp Hazardous Waste Facility Personnel Training-Detailed.pdf
4. Training Records.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		
I reviewed the facility's hazardous waste contingency plan following the inspection and identified personnel that have retired (Larry Raburn, retired July 2020) is still listed as an alternate emergency coordinator. Mr. Raburn was once one of the waste coordinators at the facility. The revision date of the contingency plan was 7/25/2020.	Citations:	Sections:
JJ1-RR-002		
There were 38 SAA/UAA/RAA locations which showed that OIC training had expired. There were also 20 SAA/UAA/RAA locations which showed that alternate OIC's training had expired.	Citations:	Sections:
JJ1-RR-003		
During the inspection, I reviewed the facility's weekly inspection logs and saw that	Citations:	Sections:

the facility was not inspecting the integrity of the sealed concrete floor in the HWPF.		
JJ1-RR-004		
RCRA training for Messrs. Laskey, Farris and Umatum had lapsed. The training records provided indicated that the last training was received on the following dates: • Matt Laskey 2/28/20 (RCRA Basic & Advanced training) • Vic Farris 2/28/20 (RCRA Basic & Advanced training) Shane Umatum 2/28/20 (RCRA Basic & Advanced training)	Citations:	Sections:
Building: C Pad Warehouse	Area:	Sub-area:
JJ1-OB-029		
According to Mr. Shannon, not waste determination has been made on waste leather gloves that are generated when damaged or worn out.	Citations:	Sections:
Building: Central Power Station (CPS)	Area: Hallway 128	Sub-area:
JJ1-OB-008		
While inspecting the SAA, I saw a yellow poly step-can for recycled lead-acid batteries that held three NiCad batteries, a fluorescent light ballast containing another NiCad battery, and four lithium batteries. At the time of the inspection, the NiCad and lithium batteries were not labeled as UW.	Citations:	Sections:

Building: Gathering Center 3 (GC3)	Area: Skid 7	Sub-area:
JJ1-OB-007		
There was step-can being utilized as a SAA container for waste solvent rags that was not closed. At the time of the inspection, the container lid was not making a complete seal with the container when closed. When we opened the lid to see what was inside, I saw that it contained waste aerosols. The hazard indicator was a Class 9 label for solvent rags instead of a Class 3 ignitable hazard indicator. Upon further inspection I saw a few waste rags inside the container and approximately 20- 25 waste aerosol cans.	Citations:	Sections:
Building: Hazardous Waste Process Facility (HWPF)	Area:	Sub-area:
JJ1-OB-006		
There were several areas where it looked as though there was some damage to the coating on the floor inside of the HWPF. Mr. Laskey said it looked as though there was still some coating underneath the damaged areas however, concrete was visible in a smaller hole that was approximately the size of a quarter. I observed another tear in the coating adjacent to the CS-4 pallet which contained drums holding waste corrosives-basic. Mr. Laskey viewed the tear in the coating and commented that it was exposed concrete beneath the tear.	Citations:	Sections:

Building: Hover craft hangar	Area:	Sub-area:
JJ1-OB-022		
While inspecting the hovercraft hanger, I saw four waste aerosol cans were not containerized, not labeled as HW, and were not marked with a hazard indicator.	Citations:	Sections:
JJ1-OB-023		
While inspecting the hovercraft hanger, I saw seven waste lithium batteries on the top shelf of a cabinet. The waste batteries were not labeled as UW batteries.	Citations:	Sections:
JJ1-OB-024		
While inspecting the hovercraft hanger, I saw a 250-gallon steel tote containing used oil, that was not labeled with the words "Used Oil."	Citations:	Sections:
Building: MCC Clinic	Area:	Sub-area:
JJ1-OB-033		
The facility had not notified as being a healthcare facility, in accordance with the Subpart P regulations.	Citations:	Sections:
Building: U11 - I&E	Area:	Sub-area:
JJ1-OB-012		
While inspecting the UAA I saw a container of UW lamps that was not closed.	Citations:	Sections:

SECTION IV – FOLLOW UP

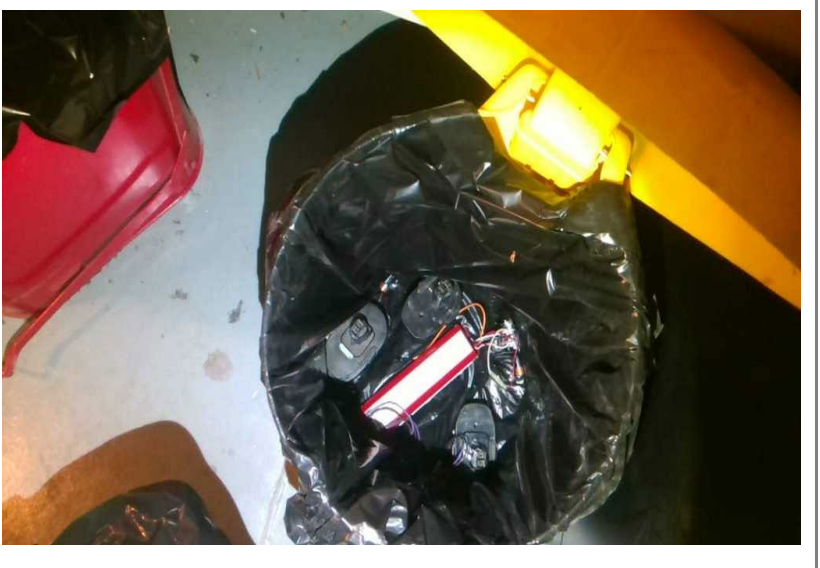
I observed no follow up at the time of the inspection.

Closing Conference

At the end of the inspection, I held a closing conference to discuss the findings of my inspection with Hilcorp North Slope Prudhoe Bay Unit personnel. I explained that I had inspected the facility looking at areas where solid, hazardous, and universal wastes were managed and that I had also inspected areas where used oil was being managed. I discussed all the areas of concern that are identified in Section III.

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

[Title] 06/17/2021 11:54 AM (AKT) Jon Jones C Pad Warehouse No CBI No PII A view of the various styles of gloves that are provided to Hilcorp employees and contractors at the Prudhoe Bay Unit.	
[Title] 06/16/2021 11:28 AM (AKT) Jon Jones Central Power Station (CPS)/Hallway 128 No CBI No PII View of a yellow poly step-can that, according to the labeling, held lead acid batteries.	

[Title]	
06/16/2021 11:28 AM (AKT)	
Jon Jones	
Central Power Station (CPS)/Hallway 128	
No CBI	
No PII	
View looking into the same yellow poly step-can, showing that the container held three NiCad batteries, a fluorescent light ballast that contained a NiCad battery, and four small lithium batteries.	
[Title]	
06/16/2021 11:30 AM (AKT)	
Jon Jones	
Central Power Station (CPS)/Hallway 128	
No CBI	
No PII	
View of the NiCad and lithium batteries after Mr. Shannon removed them from the yellow step-can.	
[Title]	
06/16/2021 11:33 AM (AKT)	
Jon Jones	
Central Power Station (CPS)/Hallway 128	
No CBI	
No PII	
View of NiCad batteries that were not labeled as UW.	

[Title] 06/16/2021 11:33 AM (AKT) Jon Jones Central Power Station (CPS)/Hallway 128 No CBI No PII Another view of NiCad batteries that were not labeled as UW.	
[Title] 06/16/2021 11:34 AM (AKT) Jon Jones Central Power Station (CPS)/Hallway 128 No CBI No PII View of lithium batteries that were not labeled as UW.	
[Title] 06/16/2021 11:45 AM (AKT) Jon Jones Central Power Station (CPS)/Hallway 128 No CBI No PII View of the UW container that Mr. Shannon used to repackage the NiCad and lithium batteries during the inspection.	

[Title] 06/16/2021 10:57 AM (AKT) Jon Jones Gathering Center 3 (GC3)/Skid 7 No CBI No PII View of a red SAA step-can that was labeled, "Hazardous Waste - Solvent rags." The container lid was not making a complete seal with the container when closed.	
[Title] 06/16/2021 10:58 AM (AKT) Jon Jones Gathering Center 3 (GC3)/Skid 7 No CBI No PII Close-up view of the same SAA container seen in the previous photo.	
[Title] 06/16/2021 10:58 AM (AKT) Jon Jones Gathering Center 3 (GC3)/Skid 7 No CBI No PII Another view of the same SAA container seen in the previous two photos. After being opened, I saw that it contained waste aerosols. The hazard indicator was a Class 9 label for solvent rags instead of a Class 3 ignitable hazard indicator. Upon further inspection I saw a few waste rags inside the container and approximately 20- 25 waste aerosol cans.	

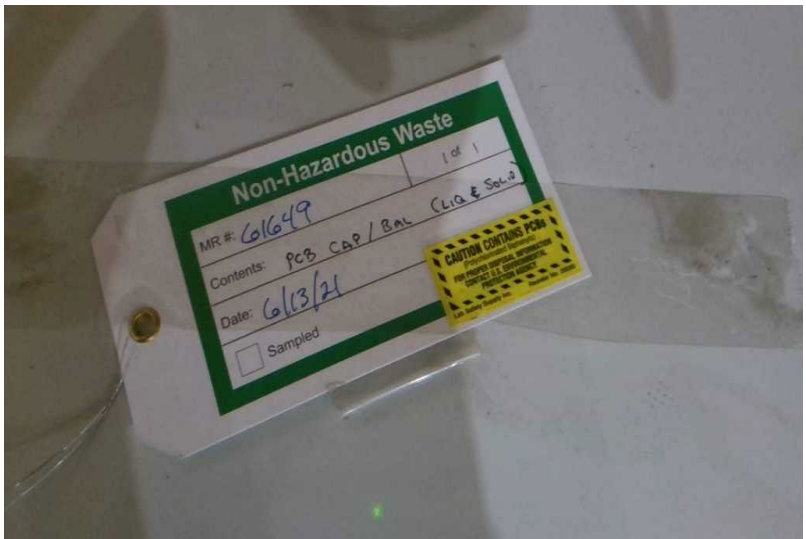
Inspection Date(s):

06/16/2021 - 06/17/2021

[Title] 06/16/2021 11:05 AM (AKT) Jon Jones Gathering Center 3 (GC3)/Skid 7 No CBI No PII Mr. Shannon removed the waste aerosol cans from the waste solvent rags SAA and placed them inside of the waste aerosol SAA, that was located just upstairs, during the inspection. This is a view of that waste aerosol SAA seen here to the right of the yellow step-can.	
[Title] 06/16/2021 11:05 AM (AKT) Jon Jones Gathering Center 3 (GC3)/Skid 7 No CBI No PII Close-up view of the waste aerosol SAA seen in the previous photo.	
[Title] 06/16/2021 09:06 AM (AKT) Jon Jones Hazardous Waste Process Facility (HWPF) No CBI No PII View of black 55-gallon container of PCB ballasts adjacent to CS-5 and just beneath pallet 08.	

Inspection Date(s):

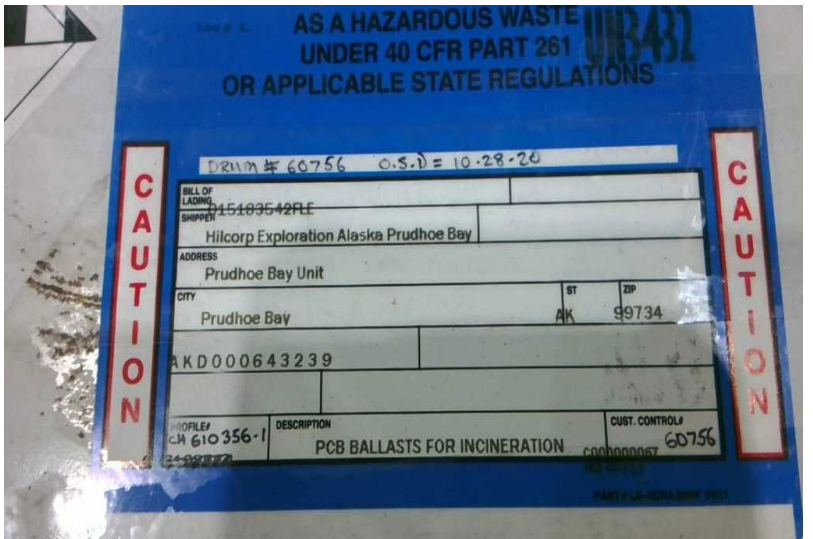
06/16/2021 - 06/17/2021

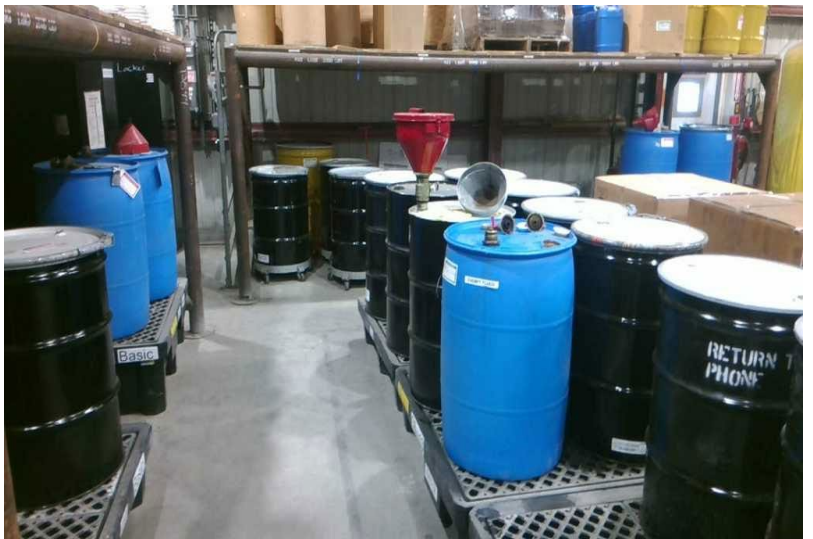
[Title] 06/16/2021 09:07 AM (AKT) Jon Jones Hazardous Waste Process Facility (HWPF) No CBI No PII Close-up view of the same black 55-gallon container of PCB ballasts seen in the previous photo.	
[Title] 06/16/2021 09:07 AM (AKT) Jon Jones Hazardous Waste Process Facility (HWPF) No CBI No PII Close-up view of the labeling on the 55-gallon container of PCB ballasts.	
[Title] 06/16/2021 09:37 AM (AKT) Jon Jones Hazardous Waste Process Facility (HWPF) No CBI No PII View of vented, overpacked container of waste aerosol residue in storage at the HWPF.	

[Title] 06/16/2021 09:37 AM (AKT) Jon Jones Hazardous Waste Process Facility (HWPF) No CBI No PII View of a second vented container of the same waste aerosol residue, seen here at the top of the photo.	
[Title] 06/16/2021 09:38 AM (AKT) Jon Jones Hazardous Waste Process Facility (HWPF) No CBI No PII Close-up view of the same container seen in the previous photo.	
[Title] 06/16/2021 09:42 AM (AKT) Jon Jones Hazardous Waste Process Facility (HWPF) No CBI No PII View of another container that held PCB ballasts for incineration that was located in the HWPF.	

Inspection Date(s):

06/16/2021 - 06/17/2021

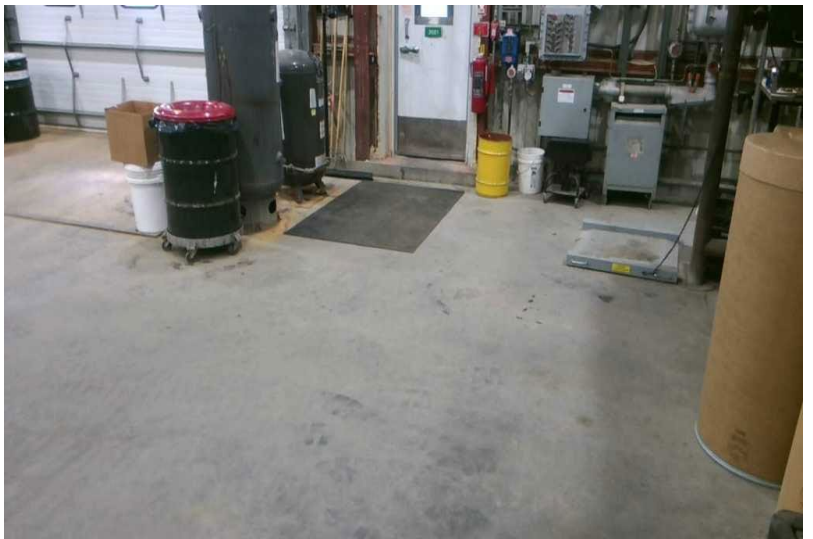
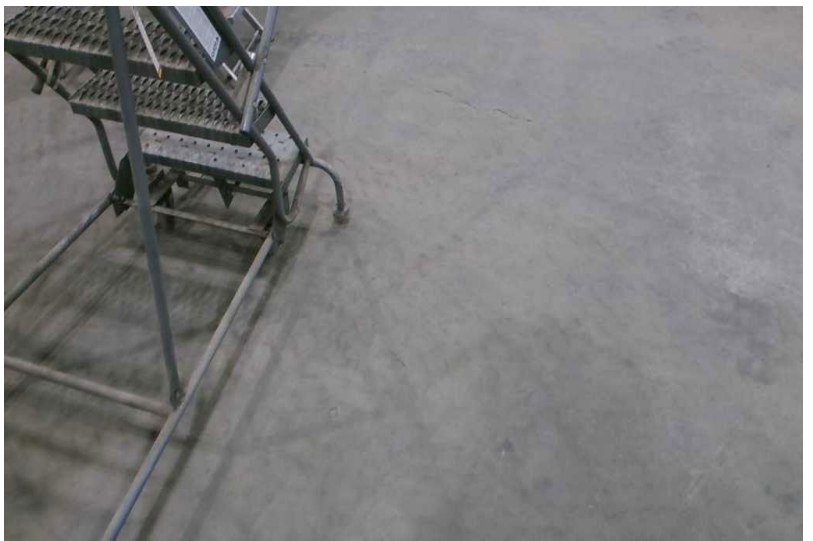
[Title] 06/16/2021 09:42 AM (AKT) Jon Jones Hazardous Waste Process Facility (HWPF) No CBI No PII View of the labeling on top of the PCB container, seen in the previous photo.	 The image shows the top of a white cylindrical container. It features a diamond-shaped hazard label with a tree and a bird, a yellow label with 'CAUTION CONTAINS PCBs' and 'Polychlorinated Biphenyls', and a blue label with 'AS A HAZARDOUS WASTE UNDER 40 CFR PART 261 OR APPLICABLE STATE REGULATIONS'. Handwritten text 'CH 610356-1' is visible on the lid.
[Title] 06/16/2021 09:42 AM (AKT) Jon Jones Hazardous Waste Process Facility (HWPF) No CBI No PII Close-up view of the labeling on top of the PCB container, seen in the previous photo.	 A close-up of the blue hazardous waste label. It includes the text 'AS A HAZARDOUS WASTE UNDER 40 CFR PART 261 OR APPLICABLE STATE REGULATIONS'. The label contains fields for 'BILL OF LADING', 'SHIPPER', 'ADDRESS', 'CITY', 'ST', 'ZIP', 'AKD000643239', 'DESCRIPTION', and 'CUST. CONTROL#'. The description is 'PCB BALLASTS FOR INCINERATION' and the control number is '60756'.
[Title] 06/16/2021 09:47 AM (AKT) Jon Jones Hazardous Waste Process Facility (HWPF) No CBI No PII View of the secondary containment spill pallets being used in place of the large white storage bins that were removed on 11/2/20.	 The image shows a warehouse interior with several large, brown, cylindrical spill pallets stacked on a wooden pallet. In the background, there are blue and black storage bins and other industrial equipment.

[Title] 06/16/2021 09:47 AM (AKT) Jon Jones Hazardous Waste Process Facility (HWPF) No CBI No PII Another view of the secondary containment spill pallets being used in place of the large white storage bins that were removed on 11/2/20.	
[Title] 06/16/2021 09:48 AM (AKT) Jon Jones Hazardous Waste Process Facility (HWPF) No CBI No PII Another view of the secondary containment spill pallets being used in place of the large white storage bins that were removed on 11/2/20.	
[Title] 06/16/2021 09:51 AM (AKT) Jon Jones Hazardous Waste Process Facility (HWPF) No CBI No PII View of the floor inside the HWPF.	

Inspection Date(s):

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[Title] 06/16/2021 09:51 AM (AKT) Jon Jones Hazardous Waste Process Facility (HWPF) No CBI No PII Another view of the floor inside the HWPF.	
[Title] 06/16/2021 09:51 AM (AKT) Jon Jones Hazardous Waste Process Facility (HWPF) No CBI No PII Another view of the floor inside the HWPF.	
[Title] 06/16/2021 09:54 AM (AKT) Jon Jones Hazardous Waste Process Facility (HWPF) No CBI No PII Additional views of the floor inside the HWPF.	

[Title] 06/16/2021 09:54 AM (AKT) Jon Jones Hazardous Waste Process Facility (HWPF) No CBI No PII Additional views of the floor inside the HWPF.	
[Title] 06/16/2021 09:55 AM (AKT) Jon Jones Hazardous Waste Process Facility (HWPF) No CBI No PII Additional views of the floor inside the HWPF.	
[Title] 06/16/2021 09:59 AM (AKT) Jon Jones Hazardous Waste Process Facility (HWPF) No CBI No PII View of several areas on the floor where there was some damage to the coating on the floor inside of the HWPF.	

[Title]	
06/16/2021 09:59 AM (AKT)	
Jon Jones	
Hazardous Waste Process Facility (HWPF)	
No CBI	
No PII	
Close-up view of several areas on the floor where there was some damage to the coating on the floor inside of the HWPF.	
[Title]	
06/16/2021 10:00 AM (AKT)	
Jon Jones	
Hazardous Waste Process Facility (HWPF)	
No CBI	
No PII	
Another view of several areas on the floor where there was some damage to the coating on the floor inside of the HWPF.	
[Title]	
06/16/2021 10:03 AM (AKT)	
Jon Jones	
Hazardous Waste Process Facility (HWPF)	
No CBI	
No PII	
Another view of several areas on the floor where there was some damage to the coating on the floor inside of the HWPF.	

[Title] 06/16/2021 10:03 AM (AKT) Jon Jones Hazardous Waste Process Facility (HWPF) No CBI No PII Close-up view of a smaller hole where the concrete was visible.	 A close-up photograph of a small, irregular hole in a light-colored concrete floor. The hole is roughly circular with jagged edges, and some darker material is visible inside it.
[Title] 06/16/2021 10:07 AM (AKT) Jon Jones Hazardous Waste Process Facility (HWPF) No CBI No PII View of another tear in the coating adjacent to the CS-4 pallet which contained drums holding waste corrosives-basic.	 A photograph showing a black plastic pallet with a yellow label that says "Basic" on it. The pallet is holding several blue drums. The floor is concrete, and there is a visible tear in the coating near the pallet.
[Title] 06/16/2021 10:07 AM (AKT) Jon Jones Hazardous Waste Process Facility (HWPF) No CBI No PII Close-up view of the tear in the coating, from the previous photo, adjacent to the CS-4 pallet which contained drums holding waste corrosives-basic.	 A close-up photograph of a tear in the concrete coating. The tear is a jagged, irregular crack in the light-colored concrete, revealing a darker material underneath. It is located near a dark, possibly black, object.

<i>[Title]</i> 06/16/2021 10:08 AM (AKT) Jon Jones Hazardous Waste Process Facility (HWPF) No CBI No PII Another close-up view of the damage to the floor seen in the previous photo.	
<i>[Title]</i> 06/16/2021 10:14 AM (AKT) Jon Jones Hazardous Waste Process Facility (HWPF) No CBI No PII Another close-up view of the damage to the floor seen in the previous photo.	
<i>[Title]</i> 06/16/2021 10:14 AM (AKT) Jon Jones Hazardous Waste Process Facility (HWPF) No CBI No PII Another close-up view showing damage to the floor and exposed concrete.	

[Title] 06/16/2021 10:14 AM (AKT) Jon Jones Hazardous Waste Process Facility (HWPF) No CBI No PII Another close-up view showing damage to the floor and exposed concrete seen in the previous photo.	
[Title] 06/17/2021 08:50 AM (AKT) Jon Jones Hover craft hangar No CBI No PII View of a cabinet marked as an SAA/UAA/RAA.	
[Title] 06/17/2021 08:51 AM (AKT) Jon Jones Hover craft hangar No CBI No PII View inside the cabinet, seen in the previous photo. Photo shows four waste aerosol cans on the shelf adjacent to the SAA container for waste aerosols.	

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[Title] 06/17/2021 08:51 AM (AKT) Jon Jones Hover craft hangar No CBI No PII View of the labeling on the SAA container.	
[Title] 06/17/2021 08:56 AM (AKT) Jon Jones Hover craft hangar No CBI No PII Close-up view of the gray SAA/UAA/RAA cabinet.	
[Title] 06/17/2021 08:56 AM (AKT) Jon Jones Hover craft hangar No CBI No PII Close-up view of the labeling on the outside of the gray cabinet.	

Inspection Date(s):

06/16/2021 - 06/17/2021

[Title] 06/17/2021 08:57 AM (AKT) Jon Jones Hover craft hangar No CBI No PII View of seven waste lithium batteries on the top shelf of the same gray cabinet seen in the previous photo. The waste batteries were not labeled as UW batteries.	
[Title] 06/17/2021 09:00 AM (AKT) Jon Jones Hover craft hangar No CBI No PII Close-up view of one of the seven waste lithium batts that were not labeled as UW.	
[Title] 06/17/2021 09:06 AM (AKT) Jon Jones Hover craft hangar No CBI No PII View of the labeling on the waste aerosol SAA container and UAA battery container inside the gray cabinet.	

[Title] 06/17/2021 09:08 AM (AKT) Jon Jones Hover craft hangar No CBI No PII Another view of the labeling on the waste aerosol SAA container and UAA battery container inside the gray cabinet.	
[Title] 06/17/2021 09:17 AM (AKT) Jon Jones Hover craft hangar No CBI No PII View of a 250-gallon steel tote containing used oil that is not labeled with the words "Used Oil."	
[Title] 06/17/2021 09:17 AM (AKT) Jon Jones Hover craft hangar No CBI No PII Another view of a 250-gallon steel tote containing used oil that is not labeled with the words "Used Oil."	

[Title] 06/17/2021 09:18 AM (AKT) Jon Jones Hover craft hangar No CBI No PII Another view of a 250-gallon steel tote containing used oil that is not labeled with the words "Used Oil."	
[Title] 06/17/2021 09:22 AM (AKT) Jon Jones Hover craft hangar No CBI No PII View of the 250-gallon steel tote containing used oil after being labeled with the words "Used Oil."	
[Title] 06/16/2021 01:08 PM (AKT) Jon Jones U11 - I&E No CBI No PII View of container of UW lamps that is not closed.	

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[Title] 06/16/2021 01:09 PM (AKT) Jon Jones U11 - I&E No CBI No PII Another view of container of UW lamps that is not closed.	
[Title] 06/16/2021 01:09 PM (AKT) Jon Jones U11 - I&E No CBI No PII View of the waste lamps inside the container.	
[Title] 06/16/2021 01:12 PM (AKT) Jon Jones U11 - I&E No CBI No PII View of the UAA container of waste lamps after being closed.	

Document Log

Document Type	Document Name	Contains CBI	Contains PII	Uploaded By	Date Received
Records Review	Prudhoe Bay Unit RCRA Contingency	No	No	Jon Jones	08/19/2021

	Plan.docx				
Records Review	2021 SAA Log 6-16-21.pdf	No	No	Jon Jones	09/08/2021
Records Review	BPXA GPB OIC Training Archive.pdf	No	No	Jon Jones	09/08/2021
Records Review	Hilcorp OIC Training Log 6-16-21.pdf	No	No	Jon Jones	09/08/2021
Records Review	Hilcorp Waste Accumulation Area Training (SAA.RAA.UAA) - FINAL.pptx	No	No	Jon Jones	09/08/2021
Records Review	SAA Training Report.xlsx	No	No	Jon Jones	09/08/2021
Records Review	Training Records for employees bringing us waste.pdf	No	No	Jon Jones	09/08/2021
Records Review	BPXA Training History - Farris, Laskey, Shannon, Umatum.xlsx	No	No	Jon Jones	09/08/2021
Records Review	Corrected Facility Training Records.pdf	No	No	Jon Jones	09/08/2021
Records Review	Hilcorp Hazardous Waste Facility Personnel Training-Detailed.pdf	No	No	Jon Jones	09/08/2021
Records Review	Training Records.pdf	No	No	Jon Jones	09/08/2021
Other - Alternative training documentation	FW procedures for update.msg	No	No	Jon Jones	09/08/2021
Other - Alternative training documentation	Hazardous Waste Process Facility and Office Emergency Response Plan.docx	No	No	Jon Jones	09/08/2021
Other - Alternative training documentation	Hazardous Waste Process Facility Waste Analysis Plan.docx	No	No	Jon Jones	09/08/2021
Other - Alternative training documentation	Procedure updates.msg	No	No	Jon Jones	09/08/2021
Other - Alternative training documentation	procedures for update.msg	No	No	Jon Jones	09/08/2021
Other - Alternative training documentation	Prudhoe Bay Unit RCRA Contingency Plan.docx	No	No	Jon Jones	09/08/2021
Records Review	Weekly HWPF inspection logs 210908102608_0001.pdf	No	No	Jon Jones	09/08/2021
Other - Waste profile PCB ballasts for incineration	CH610356-1.pdf	No	No	Jon Jones	09/08/2021
Other - Waste profile for aerosol residue	CH1031105-1.pdf	No	No	Jon Jones	09/08/2021
Communications	Hilcorp Profiles Requested PCB and Paint email.pdf	No	No	Jon Jones	09/08/2021
Other - Accumulation	Accumulation Area Inspection List 6-	No	No	Jon Jones	09/08/2021

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Area List	16-21.pdf				
Records Review	Job Descriptions.pdf	No	No	Jon Jones	09/08/2021
Communications	MCC Wing 12 Room 112 - Area of Concern Clarification1.pdf	No	No	Jon Jones	09/08/2021
Communications	RE_ MCC Wing 12 Room 112 - Area of Concern Clarification.pdf	No	No	Jon Jones	09/08/2021
Communications	Corrections to Previous Email for Training Documents and C-Plan.pdf	No	No	Jon Jones	09/08/2021
Communications	Hilcorp Accumulation Area Documents to EPA.pdf	No	No	Jon Jones	09/08/2021
Other - Waste inventory in HWPF	In shop list.pdf	No	No	Jon Jones	09/08/2021
Inspection Reports	Field_Notes_AKD000643239v1.0.pdf	No	No	Jon Jones	09/08/2021
Other - 8700-12 information	AKD000643239_Update.pdf	No	No	Jon Jones	09/22/2021
Communications	Hilcorp HWPF.pdf	No	No	Jon Jones	09/22/2021