

REGION 10 Enforcement Division

INSPECTION REPORT

Inspection Date(s):	05/10/2022 - 05/10/2022	Announced: No	
Time:	Entry: 08:03 AM (AKT)	Exit: 04:35 PM (AKT)	
Program:	RCRA		
Regulatory Program(s):	Title 40 - ENVIRONMENTAL PROTECTION AGENCY		
If Access is Denied:			
Company Name:	Fairbanks Gold Mining, Inc.		
Facility or Site Name:	Fort Knox Mine		
Facility/Site Physical Address:	#1 FORT KNOX ROAD		
(City, state, zip code)	FAIRBANKS, AK 99712		
Type of Operation:	Gold Mine		
Size of Facility:	10,000 acres		
Length of Facility at Location:	production started 1994		
Geographic Coordinates:	64.99953, -147.358107		
Mailing address: (Secondary Address)	Ms. Bartly Kleven, Environmental Manager P.O. Box 73726 Fairbanks, AK 99707-3726 bartly.kleven@kinross.com CC: Mr. Will Collingwood, Senior Environmental Engineer will.collingwood@kinross.com		
(City, state, zip code)	Fairbanks, AK 99707-3726		
County:	Fairbanks North Star Borough		
Facility/Site Identifier:	AKR000002352		
Media Number:	N/A		
NAICS:	212221 – Gold Ore Mining		
Lead Inspector:			
Jon Jones	Jones, Jon	Digitally signed by Jones, Jon Date: 2022.06.29 07:48:40 -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: 2022.06.29 11:25:41 -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 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
Senior Environmental Technician	Mr. Stephen Kinsey	(907) 490-6101	steve.kinsey@kinross.com	No	Yes
Environmental Manager	Ms. Bartly Kleven	(907) 490-2207	bartly.kleven@kinross.com	No	Yes
Senior Environmental Engineer	Mr. Will Collingwood	(907) 490-2237	will.collingwood@kinross.com	Yes	Yes

Opening Conference

EPA Lead Inspector Jon Jones arrived at the Fort Knox Mine at 08:03 AM (AKT) on 05/10/2022 for an inspection. I presented my credentials to Mr. Will Collingwood and informed him that this was an EPA RCRA inspection. The table above presents all the opening and closing conference inspection participants.

Facility/Site Description

The Fort Knox Mine is located 25 miles northeast of Fairbanks, AK in the Fairbanks mining district of Alaska and operates as a single large open pit mine. The mine is owned and operated by the Toronto-based Kinross Gold. Additional information about the facility can be found on their website at <https://www.kinross.com/home/default.aspx>.

Facility Info

What type of generator facility notified?	Small Quantity Generator (SQG)
Number of employees	Approximately 700
Weather Conditions	27 degrees with heavy fog and snow
Operating Hours	24 hours a day/7 days a week/365 days a year with two shifts, Office staff Monday through Friday from 7:00 a.m. to 4:00 p.m.
What type of	Verified SQG by Mr. Collingwood

generator facility verified as?	
Safety Training Provided to Inspector(s)?	No

Process Description

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

- Diisobutyl Ketone (DIBK) - generated in the mill laboratory and managed as hazardous waste.
- Refinery filters - designate for mercury and are managed as hazardous waste.
- HEPA filters and UHF filters - designate for mercury and are managed as hazardous waste.
- Spent parts washer fluid - generated occasionally
- Ethylene glycol (antifreeze) - sent off for recycling.
- Batteries (NiCad, lithium-ion, alkaline) and lamps/bulbs (Sodium halide and fluorescent) are managed as universal waste.
- Used oil - burned onsite in oil burning space heater. Excess used oil is managed for recycling through US Ecology
- Waste aerosols - punctured onsite and residue/fluid is managed as hazardous waste.
- Miscellaneous wastes occasionally generated from spills or cleanouts.

During the inspection of the facility, I was accompanied by Mr. Collingwood. While at the facility's CAA, I and Mr. Collingwood were accompanied by Mr. Steve Kinsey and Mr. Ryan Stahl, Environmental Technician.

On the day of the inspection, Mr. Collingwood sent me electronic copies of a couple of documents I requested. One of those documents was a description of the mine processes and the other a mine process flow chart. Both documents are included in the document log of this report.

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 listed below.

Building(s)

Building/Area/Sub-area	Process Description	Area of Concern
ALPM - Assembly Line Preventative Maintenance	Maintenance facility for trucks and heavy equipment with aerosol can popping Satellite Accumulation Area (SAA).	Yes
Barrel Storage Yard	Central Accumulation Area (CAA)	Yes
MEM shop - Mine Equipment Maintenance	Maintenance facility for mine equipment with aerosol can popping SAA.	No
Mill		Yes
Fire Assay	Separating slag from the precious metals	No
MCC -Motor Control Center	UW lamp accumulation area	Yes
Mill Lab	SAA	Yes
Warehouse	Universal waste battery accumulation area.	Yes

SECTION II – OBSERVATIONS AND RECORDS REVIEW

Observations

Building: ALPM - Assembly Line Preventative Maintenance	Contains CBI: No
Observation #: JJ1-OB-004	Date: 05/10/2022
While in the ALPM, I saw a 55-gallon container with an attached aerosol can popper. At the time of the inspection, the apparatus that punctures the waste aerosol cans was open and thus the container was not closed. Mr. Collingwood closed the container during the inspection.	
Photo(s) 1. IMG-202205101114361436762020.jpg 2. IMG-202205101114451445837622.jpg 3. IMG-202205101114531453852449.jpg 4. IMG-202205101115451545714395.jpg 5. IMG-202205101116111611838136.jpg 6. IMG-202205101117411741757640.jpg	
Building: Barrel Storage Yard	Contains CBI: No
Observation #: JJ1-OB-006	Date: 05/10/2022
While at the Barrel Storage Yard, I saw a Conex box that the facility was using as their 90-day CAA. While inspecting the contents of the Conex, I saw the following: • Two, 55-gallon containers that held waste bulbs. The facility manages their waste bulbs and lamps as universal waste. At the time of the inspection, one of the 55-gallon containers was dated 1/14/20 and the other was dated 5/21/18. According to the dates, both containers of universal waste bulbs had been in accumulation for greater than one year. At the time of the inspection, facility personnel stated they were unaware of the waste and did not dispute that they had been in accumulation for greater than a year. • One small cardboard box containing, a waste projector bulb. At the time of the inspection, the container was not labeled as either "Universal Waste – Lamp," "Waste Lamp," or "Used Lamp." I received photo documentation from the facility on 5/11/22 showing that the box was labeled as universal waste. • One, 55-gallon container of capacitors (dry type) labeled as universal waste and dated 9/10/19. According to the date, the waste capacitors have been in accumulation for greater than a year. • Three bags of UHF (Ultra High Efficiency Filters) filters, each labeled as hazardous waste but not marked with a hazard indicator. I received photo documentation from the facility on 5/11/22 showing that the three bags of UHF filters were marked with hazard indicators. • Five boxes of HEPA filters, each labeled as hazardous waste but not marked with a hazard indicator. I received photo documentation from the facility on 5/11/22 showing that the five boxes of HEPA filters were marked with hazard indicators. • Eight boxes of refinery filters, each labeled as hazardous waste but not marked with a hazard indicator. I	

received photo documentation from the facility on 5/11/22 showing that the eight boxes of HEPA filters were marked with hazard indicators.

- Two waste containers of Hydrogen Peroxide. Facility personnel didn't know how long the waste had been in the Conex. At the time of the inspection, the facility had not performed a waste determination for the containers of Hydrogen Peroxide. I received photo documentation from the facility on 5/11/22 showing that the box containing two waste containers of Hydrogen Peroxide were labeled with the words "Hazardous Waste" and marked with hazard indicators.
- One box of four-foot, waste fluorescent lamps that was not labeled as either "Universal Waste – Lamps," "Used Lamps," or "Waste Lamps." The box of waste lamps was not dated, and facility personnel didn't know how old the box of lamps was. Non-hazardous waste manifest #173316B indicated that the last shipment of universal waste lamps left the facility on 12/09/21. I received photo documentation from the facility on 5/11/22 showing that the box was labeled as universal waste.

Photo(s)

1. [IMG-20220510120646646903985.jpg](#)
2. [IMG-20220510120759759740640.jpg](#)
3. [IMG-20220510120848848695723.jpg](#)
4. [IMG-20220510120855855585888.jpg](#)
5. [IMG-2022051012090292592115.jpg](#)
6. [IMG-202205101212201220801938.jpg](#)
7. [IMG-202205101212291229670066.jpg](#)
8. [IMG-202205101222442244812546.jpg](#)
9. [IMG-202205101222492249768163.jpg](#)
10. [IMG-202205101222572257985837.jpg](#)
11. [IMG-20220510122307237929588.jpg](#)
12. [IMG-202205101223372337761091.jpg](#)
13. [IMG-202205101223502350863451.jpg](#)
14. [IMG-20220510122402242747201.jpg](#)
15. [IMG-202205101224102410725230.jpg](#)
16. [IMG-202205101224232423788986.jpg](#)
17. [IMG-202205101228392839585768.jpg](#)
18. [IMG-202205101228452845609627.jpg](#)
19. [IMG-202205101228522852662079.jpg](#)
20. [IMG-20220510122904294663819.jpg](#)
21. [IMG-202205101234323432686353.jpg](#)
22. [IMG-202205101234443444758425.jpg](#)

Building: MEM shop - Mine Equipment Maintenance

Contains CBI: No

Observation #: JJ1-OB-003

Date: 05/10/2022

While in the MEM shop, I saw a 55-gallon SAA container with an attached aerosol can popper. According to Mr. Collingwood, the punctured aerosol cans are disposed of into the trash.

I explained to Mr. Collingwood, that aerosol can popping was considered treatment and that to maintain the SAA container for the purpose of popping aerosol cans, the punctured aerosol can were required to be recycled. I also explained that waste aerosol cans could also be managed as a universal waste.

Photo(s)

1. [IMG-202205101100510511000401.jpg](#)
2. [IMG-2022051011010313798348.jpg](#)

Building: Mill Lab**Contains CBI:** No**Observation #:** JJ1-OB-001**Date:** 05/10/2022

While at the Mill lab I met with Mr. Andrew Ivey, Lab supervisor. At the time of the inspection, I saw what Andrew Ivey, Lab Supervisor, said was a 5-liter container that was being used as a satellite accumulation container for the waste Diisobutyl Ketone (DIBK). The container held several ounces of the waste. The container was labeled with the words "Hazardous Waste," and was dated 2/24/22. Even though dated, the container was verified by Mr. Ivey as being a SAA container. The container was not marked with a hazard indicator.

According to Mr. Ivey, the lab temporarily suspended the use of DIBK, due to acquiring a new multi-analysis instrument that doesn't require the DIBK. Mr. Ivey told me that they have yet to decide whether they will discontinue the use of DIBK.

Mr. Ivey applied a hazard indicator to the SAA container during the inspection.

Photo(s)

1. [IMG-202205100927252725749808.jpg](#)
2. [IMG-202205100927362736668940.jpg](#)
3. [IMG-202205100927592759642185.jpg](#)
4. [IMG-202205100930453045801166.jpg](#)

Building: Mill/Fire Assay**Contains CBI:** No**Observation #:** JJ1-OB-002**Date:** 05/10/2022

While in the fire assay, I saw six open 5-gallon containers that were being used to accumulate slag. According to Mr. Ivey, the slag is not a waste and is returned to the process. I received a profile for the slag from the facility on 5/11/22 which is included in the attachment log.

Photo(s)

1. [IMG-20220510094005405718575.jpg](#)
2. [IMG-202205100940144014786381.jpg](#)
3. [IMG-202205100940284028680806.jpg](#)
4. [IMG-202205100942304230871304.jpg](#)
5. [IMG-202205100943384338760224.jpg](#)
6. [IMG-202205100944134413692705.jpg](#)

Building: Mill/MCC -Motor Control Center**Contains CBI:** No**Observation #:** JJ1-OB-007**Date:** 05/10/2022

While in the MCC, I saw a cardboard container of eight-foot waste fluorescent lamps and a cardboard container of four-foot waste fluorescent lamps. The container of eight-foot lamps was dated 3/23/21 and had been in storage for greater than one year. Facility personnel did not dispute the accumulation date and stated that they were not aware of the less than one year time limit for universal waste.

The container of four-foot waste lamps was not dated. Mr. Kinsey said the container of four-foot waste lamps was only about six months old at the most. Non-hazardous waste manifest #173316B indicated that the last shipment of universal waste lamps left the facility on 12/09/21. I received photo documentation from the facility on 5/11/22 showing that the container was marked with the date 12/09/21.

Photo(s)

1. [IMG-202205101253325332903401.jpg](#)
2. [IMG-202205101253415341733260.jpg](#)
3. [IMG-202205101253485348518739.jpg](#)
4. [IMG-202205101253535353812502.jpg](#)
5. [IMG-20220510125401541816177.jpg](#)

Building: Warehouse**Contains CBI:** No**Observation #:** JJ1-OB-005**Date:** 05/10/2022

At the time of the inspection, I saw a container being used to accumulate waste batteries. The container was marked with a universal waste label. The date on the container was 7/21/14. According to the date on the container the batteries had been in storage for greater than one year.

A battery was found inside the container that was marked with the date 11/2015. He found that the battery dated 11/2015 was from the onsite paramedics. Mr. Kinsey said he was told by the paramedics that the 11/2015 date marked on the side of the battery was the date it was placed into the equipment and not the date that it became a waste.

Mr. Kinsey disputed the container date. According to Mr. Kinsey, the label on the container was old and had not been updated. Non-hazardous waste manifest #173316B indicated that the last shipment of universal waste batteries left the facility on 12/09/21. I received photo documentation from the facility on 5/11/22 showing that the container was marked with the date 12/09/21.

Photo(s)

1. [IMG-202205101134443444855951.jpg](#)
2. [IMG-202205101134593459835164.jpg](#)
3. [IMG-202205101135123512746800.jpg](#)

Records Review**Record:** Ensure applicable employees are trained – SQG**AOC:** Yes**Ref #:** JJ1-RR-001**Reviewed By:** Jon Jones**Reviewed Date:** 05/10/2022

Environmental awareness training for employees does not include time limits for the accumulation of universal waste and although the training contains photos of hazardous waste containers that are marked with DOT labels, the training doesn't specifically state that satellite and accumulation containers are required to be marked with a hazard indicator.

Record: Inspections		AOC: Yes
Ref #: JJ1-RR-002	Reviewed By: Jon Jones	Reviewed Date: 05/10/2022
38 weekly inspections were either not conducted or were found to be incomplete between May 10, 2019, and May 10, 2022 (3 years). At the time of the inspection, there were no documented weekly inspections for the following 21 weeks: • 5/5/19 through 7/6/19, for a total of eight consecutive weeks • *12/1/19 through 12/7/19 • *1/5/20 through 1/11/20 • 3/8/20 through 5/2/20, for a total of eight consecutive weeks • *5/24/20 through 5/30/20 • 7/18/21 through 7/24/21 • 10/24/21 through 10/30/21 *Inspection logs (included below as Documents) that were void of any information regarding a weekly hazardous waste inspection. The remaining 17 inspections logs (included below as Documents) were identified as missing information or being incomplete for the following various reasons: • No date of inspection • No time of inspection • No "Yes/No" option for inspection checklist questions • No inspector name		
Document(s) 1. 1.4.20.pdf 2. 1.5.20 to 1.11.20.pdf 3. 1.8.21.pdf 4. 1.14.21.pdf 5. 1.17.20.pdf 6. 1.17.21 to 1.23.21.pdf 7. 5.9.21 to 5.15.21.pdf 8. 5.14.20.pdf 9. 5.16.21.pdf 10. 5.24.20 to 5.30.20.pdf 11. 8.8.19.pdf 12. 8.16.19.pdf 13. 8.25.19.pdf 14. 8.29.20.pdf 15. 9.6.19.pdf 16. 9.13.19.pdf 17. 9.28.20.pdf 18. 10.18.19.pdf		

19. 11.8.19.pdf
20. 12.1.19 to 12.7.19.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		
Environmental awareness training for employees does not include time limits for the accumulation of universal waste and although the training contains photos of hazardous waste containers that are marked with DOT labels, the training doesn't specifically state that satellite and accumulation containers are required to be marked with a hazard indicator.	Citations: 262.16(b)(9)(iii)	Sections:
JJ1-RR-002		
38 weekly inspections were either not conducted (21) or were found to be incomplete (17) between May 10, 2019, and May 10, 2022 (3 years).	Citations: 262.16(b)(2)(iv)	Sections:
Building: ALPM - Assembly Line Preventative Maintenance	Area:	Sub-area:
JJ1-OB-004		
While in the ALPM, I saw a 55-gallon container with an attached aerosol can popper. At the time of the inspection, the apparatus that punctures the waste aerosol cans was open and thus the container was not closed.	Citations: 262.16(b)(2)(iii)(A)	Sections:
Building: Barrel Storage Yard	Area:	Sub-area:
JJ1-OB-006		

One box of four-foot, waste fluorescent lamps that was not labeled as either "Universal Waste – Lamps," "Used Lamps," or "Waste Lamps."	Citations: 273.14(e)	Sections:
Two waste containers of Hydrogen Peroxide. Facility personnel didn't know how long the waste had been in the Conex. At the time of the inspection, the facility had not performed a waste determination for the containers of Hydrogen Peroxide.	Citations: 262.11	Sections:
One, 55-gallon container of capacitors (dry type) labeled as universal waste and dated 9/10/19. According to the date, the waste capacitors have been in accumulation for greater than a year.	Citations: Under Review	Sections:
Two, 55-gallon containers that held waste bulbs. The facility manages their waste bulbs and lamps as universal waste. At the time of the inspection, one of the 55-gallon containers was dated 1/14/20 and the other was dated 5/21/18. According to the dates, both containers of universal waste bulbs have been in accumulation for greater than one year. At the time of the inspection, facility personnel stated they were unaware of the waste and did not dispute that they had been in accumulation for greater than a year.	Citations: 273.15(a)	Sections:
One small cardboard box containing, a waste projector bulb. At the time of the inspection, the container was not labeled as either	Citations: 273.14(e)	Sections:

“Universal Waste – Lamp,” “Waste Lamp,” or “Used Lamp.”		
Three bags of UHF (Ultra High Efficiency Filters) filters, each labeled as hazardous waste but not marked with a hazard indicator. Five boxes of HEPA filters, each labeled as hazardous waste but not marked with a hazard indicator. Eight boxes of refinery filters, each labeled as hazardous waste but not marked with a hazard indicator.	Citations: 262.16(b)(6)(i)(B)	Sections:
Building: Mill	Area: MCC -Motor Control Center	Sub-area:
JJ1-OB-007		
While in the MCC, I saw a cardboard container of eight-foot waste fluorescent lamps and a cardboard container of four-foot waste fluorescent lamps. The container of eight-foot lamps was dated 3/23/21 and had been in storage for greater than one year. Facility personnel did not dispute the accumulation date and stated that they were not aware of the less than one year time limit for universal waste.	Citations: 273.15(a)	Sections:
Building: Mill Lab	Area:	Sub-area:
JJ1-OB-001		
At the time of the inspection, I saw a 5-liter container that was being used as a satellite accumulation container for waste Diisobutyl Ketone (DIBK). The container was not marked with a hazard indicator.	Citations: 262.16(b)(6)(i)(B)	Sections:

Mr. Ivey, applied a hazard indicator to the SAA container during the inspection.		
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SECTION IV – FOLLOW UP

N/A

Closing Conference

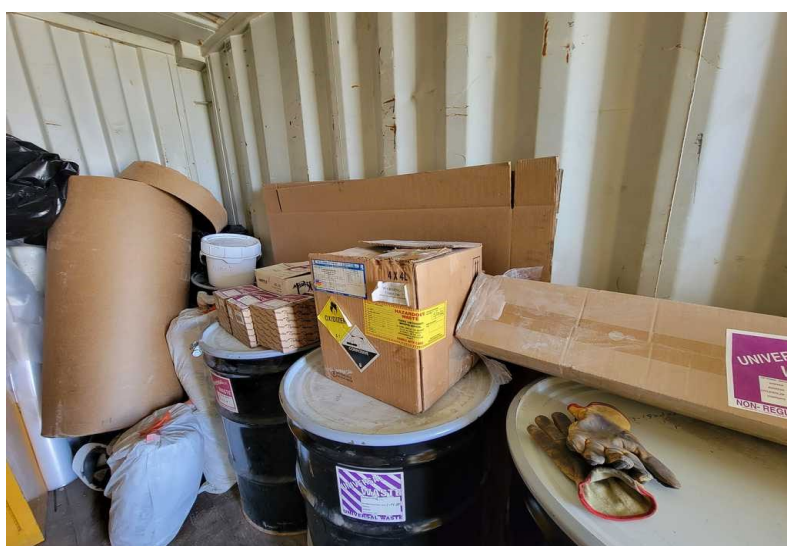
At the conclusion of the inspection, I conducted a closing conference that was attended by those listed in the Attendees table, in Section I of this report. I thanked everyone for their time and cooperation during the inspection and began a review of the areas of concern (listed in Section III – Areas 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 they would receive a copy of the report as would a case officer. I told them the case officer would review the report to determine if any of my areas of concern are documented violations.

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

[Title]	
IMG-20220510113805385172305.jpg	
05/10/2022 11:38 AM (AKT)	
Jon Jones	
Warehouse	
No CBI	
No PII	
View of waste battery marked with the date 11/2015.	

[Title] IMG-20220510120052052777810.jpg 05/10/2022 12:00 PM (AKT) Jon Jones Barrel Storage Yard No CBI No PII View of two, 55-gallon containers holding universal waste bulbs that have been in accumulation for greater than one year.	
[Title] IMG-2022051012010111635820.jpg 05/10/2022 12:01 PM (AKT) Jon Jones Barrel Storage Yard No CBI No PII Close-up view of the label, showing the accumulation start date of 1-14-20, indicating that the universal waste bulbs have been in accumulation for greater than one year.	
[Title] IMG-2022051012010717609325.jpg 05/10/2022 12:01 PM (AKT) Jon Jones Barrel Storage Yard No CBI No PII Close-up view of the label, showing the accumulation start date of 5-21-18, indicating that the universal waste bulbs have been in accumulation for greater than one year.	

[Title]
Labels in Connex 1.jpg
05/23/2022 01:37 PM (AKT)
Fort Knox Mine
Barrel Storage Yard
No CBI
No PII
Photo provided by facility, showing that the box containing the waste projector bulb had been labeled as universal waste.
[Title]
Labels in Connex 2.jpg
05/23/2022 01:37 PM (AKT)
Fort Knox Mine
Barrel Storage Yard
No CBI
No PII
Photo provided by facility, showing that the box containing the waste Hydrogen Peroxide had been labeled as hazardous waste and marked with hazard indicators.
[Title]
Labels in Connex 3.jpg
05/23/2022 01:38 PM (AKT)
Fort Knox Mine
Barrel Storage Yard
No CBI
No PII
Photo provided by facility, showing that the box containing the four-foot waste fluorescent lamps had been labeled as universal waste.



[Title]

Labels in Connex 4.jpg

05/23/2022 01:38 PM (AKT)

Fort Knox Mine

Barrel Storage Yard

No CBI

No PII

Photo provided by facility, showing that the eight boxes containing the waste refinery filters had been marked with hazard indicators.



[Title]

Labels in Connex 5.jpg

05/23/2022 01:38 PM (AKT)

Fort Knox Mine

Barrel Storage Yard

No CBI

No PII

Photo provided by facility, showing that the five boxes containing the waste HEPA filters and three bags containing the waste UHF filters had been marked with hazard indicators.



[Title]

Light Bulb Barrel MCC.jpg

05/23/2022 01:38 PM (AKT)

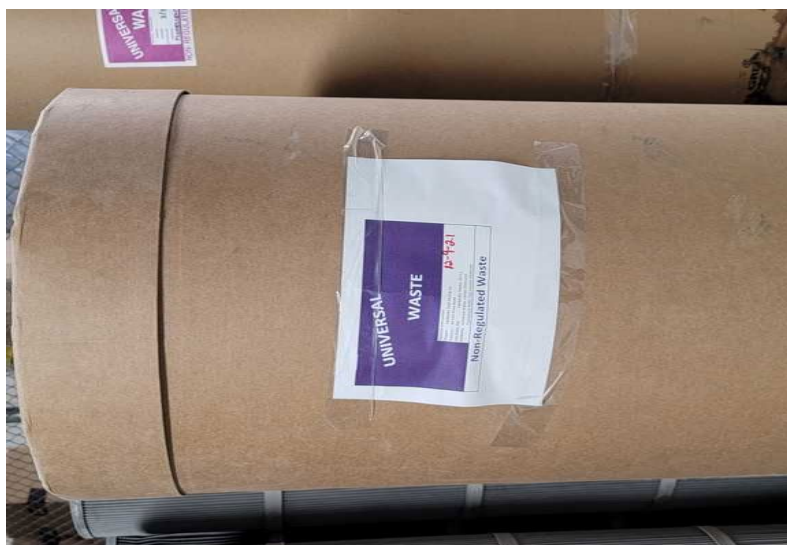
Fort Knox Mine

Mill/MCC -Motor Control Center

No CBI

No PII

Photo provided by facility, showing that the date of 12/09/21 had been added to the label on the container of universal waste lamps, as per the date of the facility's last shipment.



[Title]
Warehouse Battery Bin.jpg
05/23/2022 01:38 PM (AKT)
Fort Knox Mine
Warehouse
No CBI
No PII
Photo provided by facility, showing that the date of 12/09/21 had been added to the label on the container of universal waste lamps, as per the date of the facility's last shipment.



[Title]
IMG-202205101114361436762020.jpg
05/10/2022 11:14 AM (AKT)
Jon Jones
ALPM - Assembly Line Preventative Maintenance
No CBI
No PII
View of 55-gallon container with attached aerosol can popper. The apparatus that punctures the waste aerosol cans, seen to the left, is open and thus the container is not closed.



[Title]
IMG-202205101114451445837622.jpg
05/10/2022 11:14 AM (AKT)
Jon Jones
ALPM - Assembly Line Preventative Maintenance
No CBI
No PII
Another view of 55-gallon container with attached aerosol can popper. The apparatus that punctures the waste aerosol cans, seen to the left, is open and thus the container is not closed.



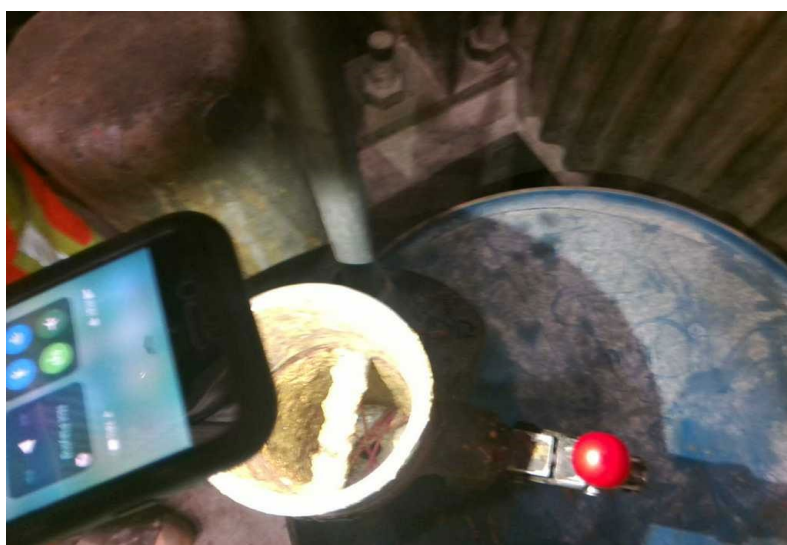
[Title]
IMG-202205101114531453852449.jpg
05/10/2022 11:14 AM (AKT)
Jon Jones
ALPM - Assembly Line Preventative Maintenance
No CBI
No PII
Close-up view of 55-gallon container with attached aerosol can popper. The apparatus that punctures the waste aerosol cans, seen to the left, is open and thus the container is not closed.



[Title]
IMG-202205101115451545714395.jpg
05/10/2022 11:15 AM (AKT)
Jon Jones
ALPM - Assembly Line Preventative Maintenance
No CBI
No PII
Close-up view, looking down into the attached aerosol can popper. The apparatus that punctures the waste aerosol cans is open and thus the container is not closed.



[Title]
IMG-202205101116111611838136.jpg
05/10/2022 11:16 AM (AKT)
Jon Jones
ALPM - Assembly Line Preventative Maintenance
No CBI
No PII
Another close-up view, looking down into the attached aerosol can popper with cell phone light. The apparatus that punctures the waste aerosol cans is open and thus the container is not closed.



[Title]
IMG-202205101117411741757640.jpg
05/10/2022 11:17 AM (AKT)
Jon Jones
ALPM - Assembly Line Preventative Maintenance
No CBI
No PII
View of the attached aerosol can popper after Mr. Collingwood closed it during the inspection.



[Title]
IMG-20220510120646646903985.jpg
05/10/2022 12:06 PM (AKT)
Jon Jones
Barrel Storage Yard
No CBI
No PII
View of a small cardboard box containing a waste projector bulb that is not labeled as either "Universal Waste – Lamp," "Waste Lamp," or "Used Lamp."



[Title]
IMG-20220510120759759740640.jpg
05/10/2022 12:07 PM (AKT)
Jon Jones
Barrel Storage Yard
No CBI
No PII
Another view of a small cardboard box containing a waste projector bulb that is not labeled as either "Universal Waste – Lamp," "Waste Lamp," or "Used Lamp."



[Title] IMG-20220510120848848695723.jpg 05/10/2022 12:08 PM (AKT) Jon Jones Barrel Storage Yard No CBI No PII View of two, 55-gallon containers of universal waste bulbs. One dated 1/14/20 and the other dated 5/21/18. Both have been in accumulation for greater than one year.	
[Title] IMG-20220510120855855585888.jpg 05/10/2022 12:08 PM (AKT) Jon Jones Barrel Storage Yard No CBI No PII Close-up view of the universal waste container dated 1/14/20.	
[Title] IMG-2022051012090292592115.jpg 05/10/2022 12:09 PM (AKT) Jon Jones Barrel Storage Yard No CBI No PII Close-up view of the universal waste container dated 5/21/18.	

[Title]
IMG-202205101212201220801938.jpg
05/10/2022 12:12 PM (AKT)
Jon Jones
Barrel Storage Yard
No CBI
No PII
View of 55-gallon container of capacitors (dry type) labeled as universal waste and dated 9/10/19.



[Title]
IMG-202205101212291229670066.jpg
05/10/2022 12:12 PM (AKT)
Jon Jones
Barrel Storage Yard
No CBI
No PII
Close-up view of the label on the 55-gallon container of capacitors (dry type) labeled as universal waste and dated 9/10/19.



[Title]
IMG-202205101222442244812546.jpg
05/10/2022 12:22 PM (AKT)
Jon Jones
Barrel Storage Yard
No CBI
No PII
View of one of the three bags of waste UHF filters showing that it is not marked with a hazard indicator.



[Title]
IMG-202205101222492249768163.jpg
05/10/2022 12:22 PM (AKT)
Jon Jones
Barrel Storage Yard
No CBI
No PII
View of the other two bags containing the waste UHF filters.

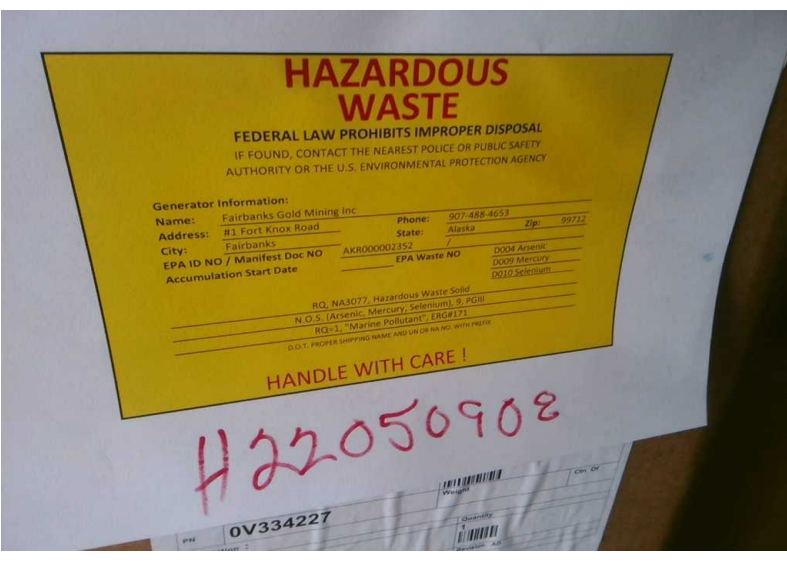


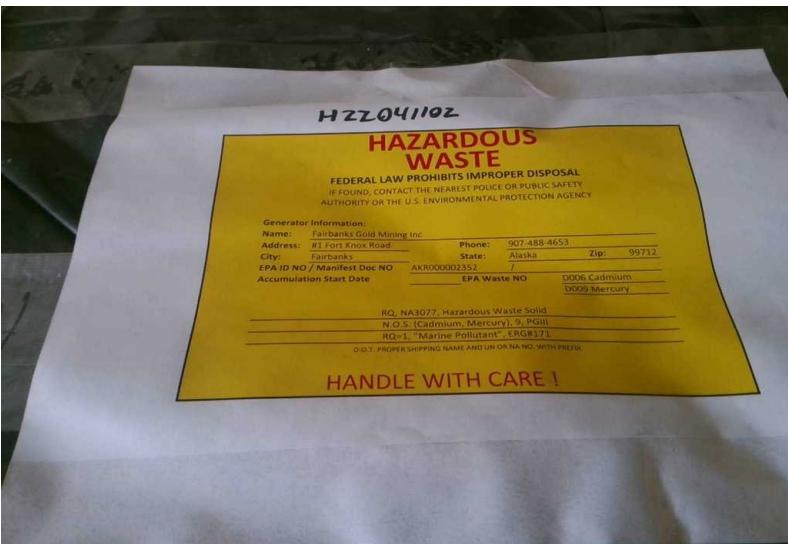
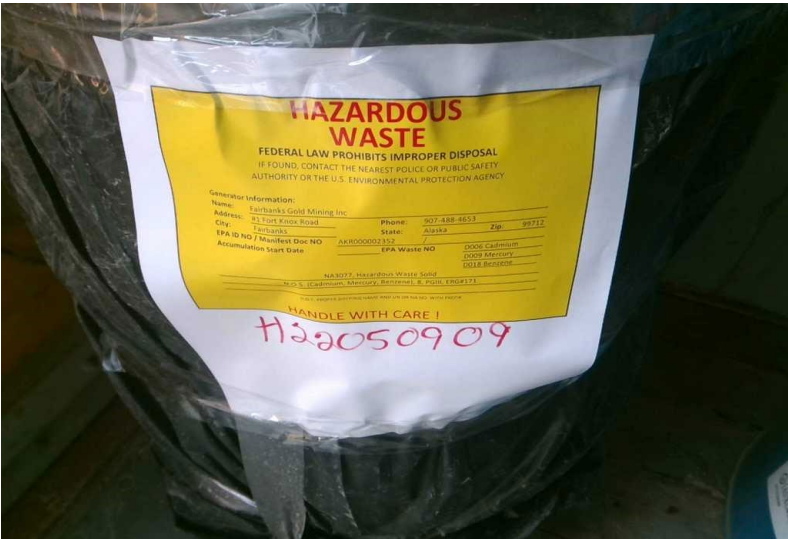
[Title]
IMG-202205101222572257985837.jpg
05/10/2022 12:22 PM (AKT)
Jon Jones
Barrel Storage Yard
No CBI
No PII
View of the five boxes of waste HEPA filters, showing that they are not marked with hazard indicators.



[Title]
IMG-20220510122307237929588.jpg
05/10/2022 12:23 PM (AKT)
Jon Jones
Barrel Storage Yard
No CBI
No PII
View of the eight boxes of waste refinery filters that are not marked with hazard indicators.



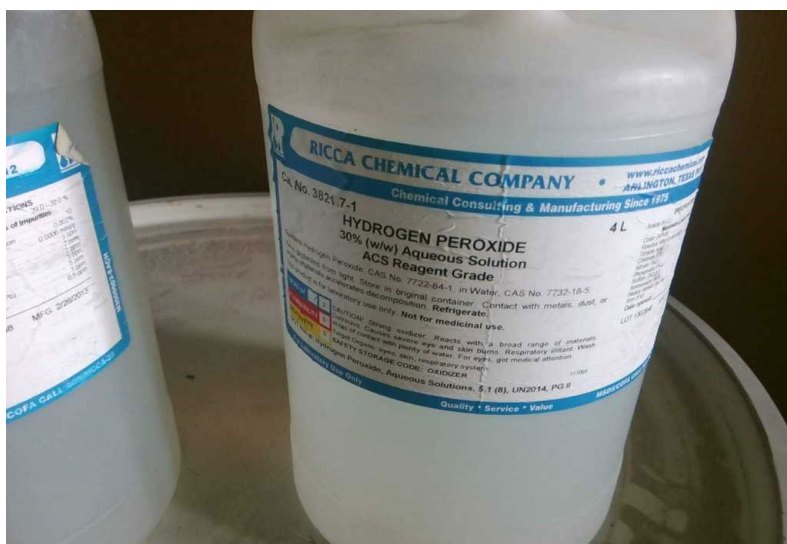
[Title]	
IMG-202205101223372337761091.jpg	
05/10/2022 12:23 PM (AKT)	
Jon Jones	
Barrel Storage Yard	
No CBI	
No PII	
Close-up view of the label on one of the eight boxes of waste refinery filters.	
[Title]	
IMG-202205101223502350863451.jpg	
05/10/2022 12:23 PM (AKT)	
Jon Jones	
Barrel Storage Yard	
No CBI	
No PII	
Another view of the eight boxes of waste refinery filters, showing that they are not marked with hazard indicators.	
[Title]	
IMG-20220510122402242747201.jpg	
05/10/2022 12:24 PM (AKT)	
Jon Jones	
Barrel Storage Yard	
No CBI	
No PII	
Close-up view of the label on one of the five boxes of waste HEPA filters.	

[Title]	
IMG-202205101224102410725230.jpg	
05/10/2022 12:24 PM (AKT)	
Jon Jones	
Barrel Storage Yard	
No CBI	
No PII	
Close-up view of the label on another of the five boxes of waste HEPA filters.	
[Title]	
IMG-202205101224232423788986.jpg	
05/10/2022 12:24 PM (AKT)	
Jon Jones	
Barrel Storage Yard	
No CBI	
No PII	
Close-up view of the label on one of the three bags of waste UHF filters.	
[Title]	
IMG-202205101228392839585768.jpg	
05/10/2022 12:28 PM (AKT)	
Jon Jones	
Barrel Storage Yard	
No CBI	
No PII	
View of the two, one-gallon containers of waste Hydrogen Peroxide.	

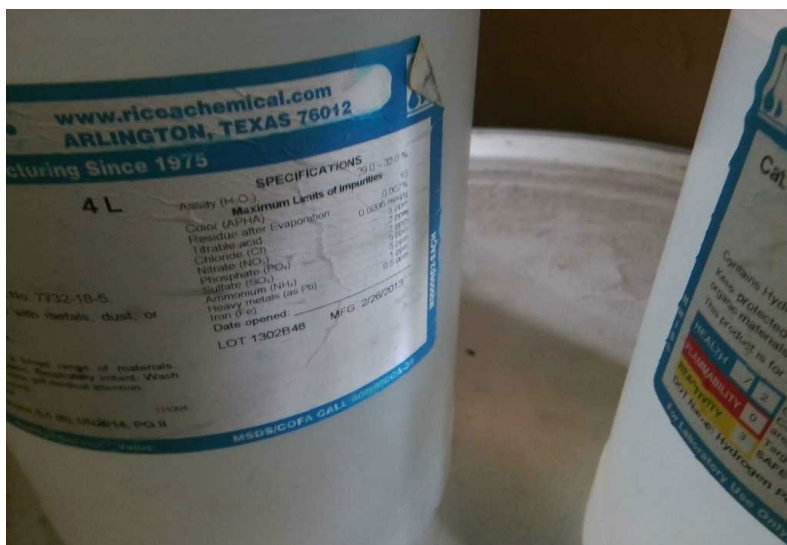
[Title]
IMG-202205101228452845609627.jpg
05/10/2022 12:28 PM (AKT)
Jon Jones
Barrel Storage Yard
No CBI
No PII
Close-up view of the two, one-gallon containers of waste Hydrogen Peroxide.



[Title]
IMG-202205101228522852662079.jpg
05/10/2022 12:28 PM (AKT)
Jon Jones
Barrel Storage Yard
No CBI
No PII
Close-up view of the label on one of the two, one-gallon containers of waste Hydrogen Peroxide.



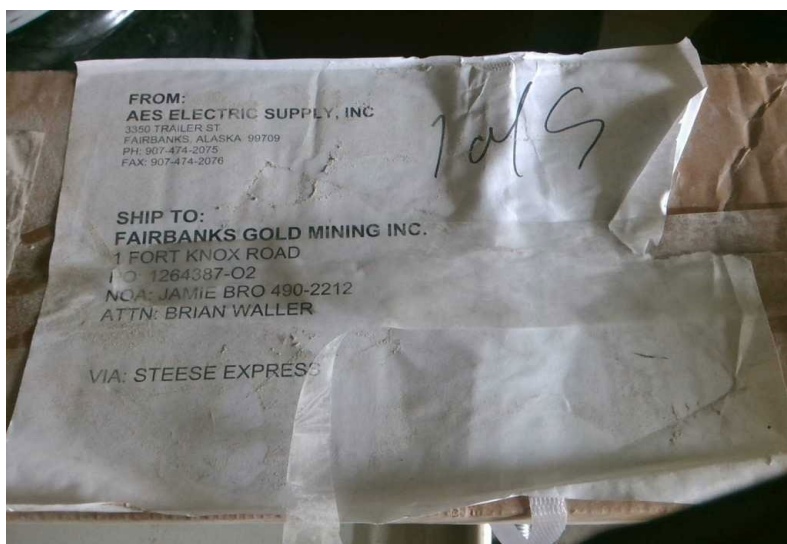
[Title]
IMG-20220510122904294663819.jpg
05/10/2022 12:29 PM (AKT)
Jon Jones
Barrel Storage Yard
No CBI
No PII
Close-up view of the label on one of the two, one-gallon containers of waste Hydrogen Peroxide.



[Title]
IMG-202205101234323432686353.jpg
05/10/2022 12:34 PM (AKT)
Jon Jones
Barrel Storage Yard
No CBI
No PII
View of box containing waste fluorescent lamps that is not labeled as either "Universal Waste – Lamps," "Waste Lamps," or "Used Lamps."



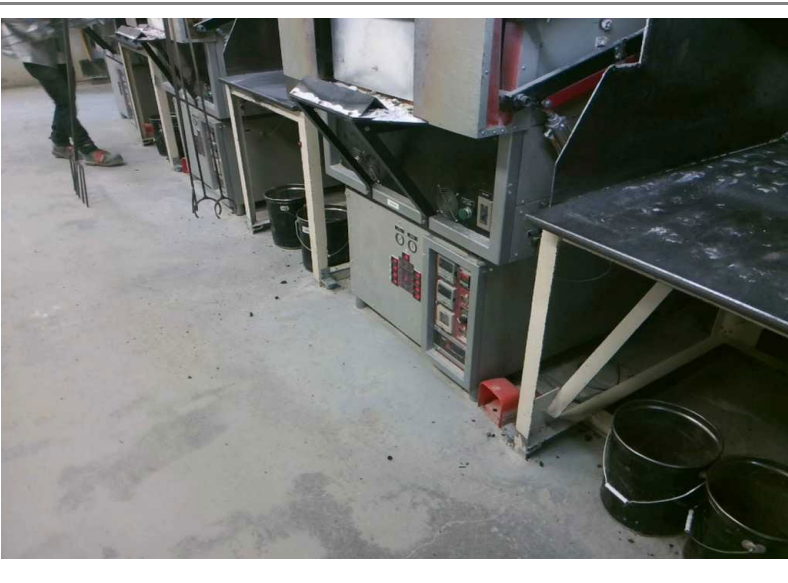
[Title]
IMG-202205101234443444758425.jpg
05/10/2022 12:34 PM (AKT)
Jon Jones
Barrel Storage Yard
No CBI
No PII
Close-up view of the label on the box of waste fluorescent lamps.

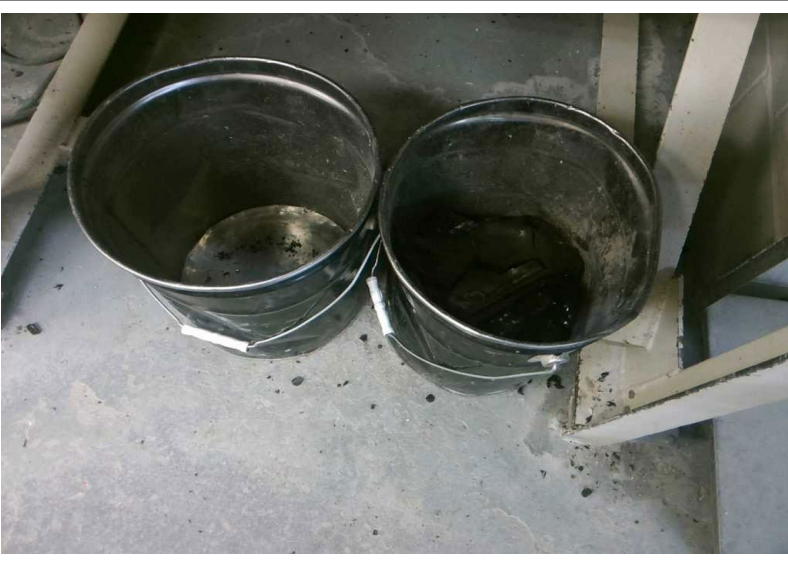


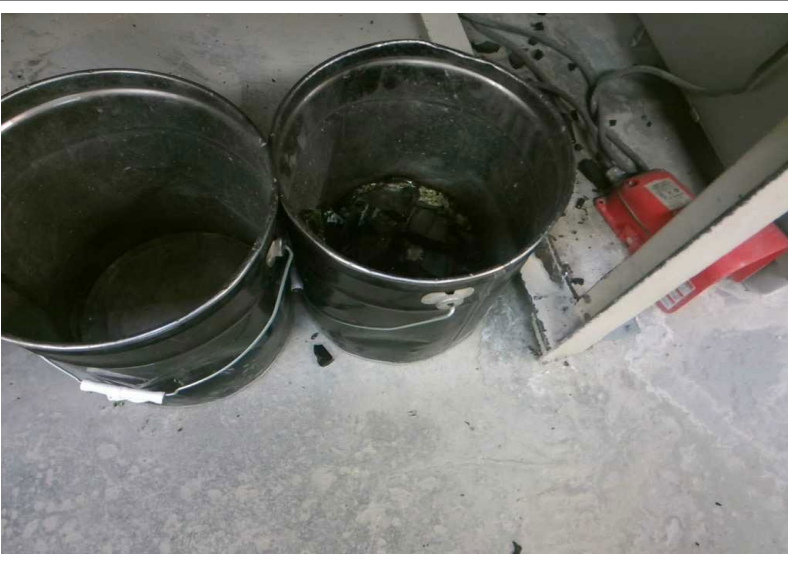
[Title]
IMG-202205101100510511000401.jpg
05/10/2022 11:00 AM (AKT)
Jon Jones
MEM shop - Mine Equipment Maintenance
No CBI
No PII
View of 55-gallon SAA container with attached aerosol can popper, adjacent to another container where the punctured cans are collected. According to Mr. Collingwood, the punctured aerosol cans are disposed of into the trash and not recycled.



[Title] IMG-2022051011010313798348.jpg 05/10/2022 11:01 AM (AKT) Jon Jones MEM shop - Mine Equipment Maintenance No CBI No PII View of the punctured aerosols in the trash.	
[Title] IMG-202205100927252725749808.jpg 05/10/2022 09:27 AM (AKT) Jon Jones Mill Lab No CBI No PII View of a five-liter container that was being used as a satellite accumulation container for waste DIBK. The container seen here on the spill pallet, held several ounces of the waste. The container is seen here labeled with the words "Hazardous Waste."	
[Title] IMG-202205100927362736668940.jpg 05/10/2022 09:27 AM (AKT) Jon Jones Mill Lab No CBI No PII Close-up view of the container label, showing that there is no hazard indicator.	

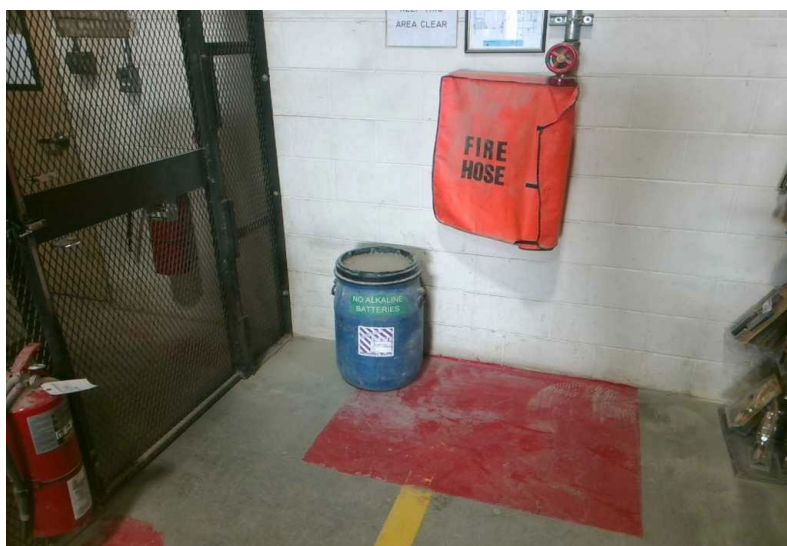
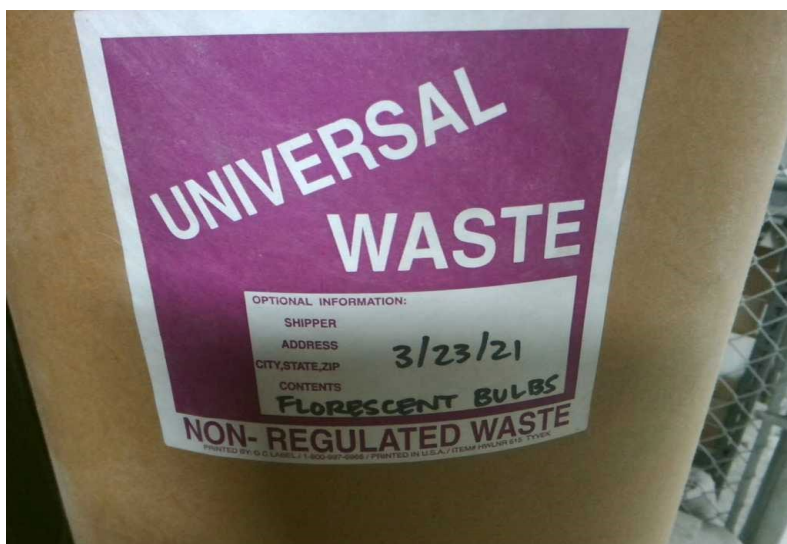
[Title] IMG-202205100927592759642185.jpg 05/10/2022 09:27 AM (AKT) Jon Jones Mill Lab No CBI No PII Close-up view showing the liquid level in the container.	
[Title] IMG-202205100930453045801166.jpg 05/10/2022 09:30 AM (AKT) Jon Jones Mill Lab No CBI No PII Mr. Ivey, applied a hazard indicator to the opposite side of the SAA container during the inspection.	
[Title] IMG-20220510094005405718575.jpg 05/10/2022 09:40 AM (AKT) Jon Jones Mill/Fire Assay No CBI No PII View of six open five-gallon containers that were being used to accumulate slag. According to Mr. Ivey, the slag is returned to the process.	

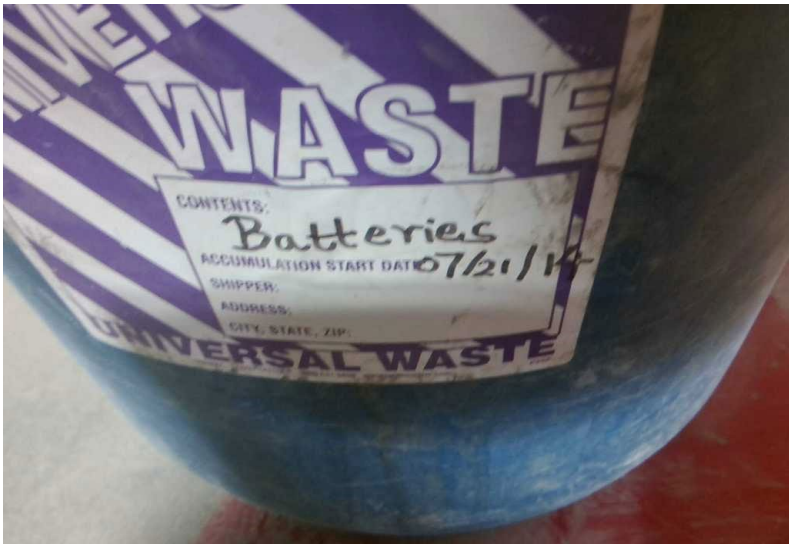
[Title] IMG-202205100940144014786381.jpg 05/10/2022 09:40 AM (AKT) Jon Jones Mill/Fire Assay No CBI No PII Close-up view of the containers that were being used to accumulate slag. According to Mr. Ivey, the slag is returned to the process.	
[Title] IMG-202205100940284028680806.jpg 05/10/2022 09:40 AM (AKT) Jon Jones Mill/Fire Assay No CBI No PII Another close-up view of the containers that were being used to accumulate slag. According to Mr. Ivey, the slag is returned to the process.	
[Title] IMG-202205100942304230871304.jpg 05/10/2022 09:42 AM (AKT) Jon Jones Mill/Fire Assay No CBI No PII Another view of the containers that were being used to accumulate slag. According to Mr. Ivey, the slag is returned to the process.	

[Title] IMG-202205100943384338760224.jpg 05/10/2022 09:43 AM (AKT) Jon Jones Mill/Fire Assay No CBI No PII Another close-up view of the containers that were being used to accumulate slag. According to Mr. Ivey, the slag is returned to the process.	
[Title] IMG-202205100944134413692705.jpg 05/10/2022 09:44 AM (AKT) Jon Jones Mill/Fire Assay No CBI No PII Another close-up view of the containers that were being used to accumulate slag. According to Mr. Ivey, the slag is returned to the process.	
[Title] IMG-202205101253325332903401.jpg 05/10/2022 12:53 PM (AKT) Jon Jones Mill/MCC -Motor Control Center No CBI No PII View of containers that hold universal waste lamps.	

[Title] IMG-202205101253415341733260.jpg 05/10/2022 12:53 PM (AKT) Jon Jones Mill/MCC -Motor Control Center No CBI No PII View of an undated container of four-foot waste fluorescent lamps that's being managed as universal waste.	
[Title] IMG-202205101253485348518739.jpg 05/10/2022 12:53 PM (AKT) Jon Jones Mill/MCC -Motor Control Center No CBI No PII Close-up view of the label on the container of four-foot waste fluorescent lamps.	
[Title] IMG-202205101253535353812502.jpg 05/10/2022 12:53 PM (AKT) Jon Jones Mill/MCC -Motor Control Center No CBI No PII View of the container holding eight-foot waste fluorescent lamps.	

[Title]
IMG-20220510125401541816177.jpg
05/10/2022 12:54 PM (AKT)
Jon Jones
Mill/MCC -Motor Control Center
No CBI
No PII
Close-up view of the label on the container holding the eight-foot waste fluorescent lamps. The date is seen here on the label as 3/23/21, showing that the lamps have been in accumulation for greater than one year.
[Title]
IMG-202205101134443444855951.jpg
05/10/2022 11:34 AM (AKT)
Jon Jones
Warehouse
No CBI
No PII
View of a waste battery container, seen here labeled as universal waste. The date marked on the container is 7/21/14, indicating that the batteries have been in accumulation for greater than one year.
[Title]
IMG-202205101134593459835164.jpg
05/10/2022 11:34 AM (AKT)
Jon Jones
Warehouse
No CBI
No PII
Close-up view of the container seen in IMG-202205101134443444855951.jpg



[Title]	
IMG-202205101135123512746800.jpg	
05/10/2022 11:35 AM (AKT)	
Jon Jones	
Warehouse	
No CBI	
No PII	
Close-up view of the universal waste label showing the date of 7/21/14.	

Document Log

Document Type	Document Name	Contains CBI	Contains PII	Uploaded By	Date Received
Process Description/Flow Diagram	Fort Knox Ore Processing Flow Sheet 2020.pdf	No	No	Jon Jones	05/23/2022
Process Description/Flow Diagram	Fort_Knox_Process Description_1.pdf	No	No	Jon Jones	05/23/2022
Other - 2021 Activity Rpt	Fort Knox Annual Activity Report for Reporting Year 2021.pdf	No	No	Jon Jones	05/23/2022
Other - 2021 Waste Shipments	Fort Knox 2021 Waste Shipment.xlsx	No	No	Jon Jones	05/23/2022
Personnel Training	Environmental Awareness Training.pdf	No	No	Jon Jones	05/23/2022
Records Review	1.4.20.pdf	No	No	Jon Jones	05/23/2022
Records Review	1.5.20 to 1.11.20.pdf	No	No	Jon Jones	05/23/2022
Records Review	1.8.21.pdf	No	No	Jon Jones	05/23/2022
Records Review	1.14.21.pdf	No	No	Jon Jones	05/23/2022
Records Review	1.17.20.pdf	No	No	Jon Jones	05/23/2022
Records Review	1.17.21 to 1.23.21.pdf	No	No	Jon Jones	05/23/2022
Records Review	5.9.21 to 5.15.21.pdf	No	No	Jon Jones	05/23/2022
Records Review	5.14.20.pdf	No	No	Jon Jones	05/23/2022
Records Review	5.16.21.pdf	No	No	Jon Jones	05/23/2022
Records Review	5.24.20 to 5.30.20.pdf	No	No	Jon Jones	05/23/2022
Records Review	8.8.19.pdf	No	No	Jon Jones	05/23/2022
Records Review	8.16.19.pdf	No	No	Jon Jones	05/23/2022
Records Review	8.25.19.pdf	No	No	Jon Jones	05/23/2022

Inspection Date(s):

05/10/2022 - 05/10/2022

Records Review	8.29.20.pdf	No	No	Jon Jones	05/23/2022
Records Review	9.6.19.pdf	No	No	Jon Jones	05/23/2022
Records Review	9.13.19.pdf	No	No	Jon Jones	05/23/2022
Records Review	9.28.20.pdf	No	No	Jon Jones	05/23/2022
Records Review	10.18.19.pdf	No	No	Jon Jones	05/23/2022
Records Review	11.8.19.pdf	No	No	Jon Jones	05/23/2022
Records Review	12.1.19 to 12.7.19.pdf	No	No	Jon Jones	05/23/2022
Other - Waste Profile for Slag in Fire Assay	Waste Profile for Laboratory Slag.pdf	No	No	Jon Jones	05/23/2022
Other - Waste Profile for Parts Washer Solvent	Waste Profile for Parts Washer Fluid.pdf	No	No	Jon Jones	05/23/2022
Field Inspection Notes	Field_Notes_AKR000002352v1.0.pdf	No	No	Jon Jones	06/15/2022