

INSPECTION REPORT

Inspection Entry Date/Time	05/16/2023 08:52 AM (PT)	Announced: No	
Inspection Exit Date/Time	05/18/2023 05:00 PM (PT)	Access: Granted	
Regulatory Program	RCRA		
Type of Inspection	Compliance Evaluation Inspection (CEI)		
Company Name	Phillips 66 Company		
Facility or Site Name	Phillips 66 Co Ferndale		
Facility/Site Identifier	WAD009250366		
Facility/Site Physical Address	3901 Unick Rd		
City, State, Zip Code	Ferndale, WA 98248		
County/Borough	Whatcom		
Generator Status	Large Quantity Generator (LQG) and Permitted RCRA Hazardous Waste Storage Site		
NAICS	324110 - Petroleum Refineries		
Type of Operation	Petroleum Refinery		
Geographic Coordinates	48.830142, -122.692114		
Mailing Address/Secondary Address	Josh Gardner, Environmental Team Leader josh.gardner@p66.com PO Box 8 Ferndale, WA 98248 (360) 380-7165 CC: Vivek Gopal, HSE Manager Ferndale Refinery vivek.gopal@p66.com		
City, State, Zip Code	Ferndale, WA 98248		
Permit Number (If Applicable)	WAD009250366		
Lead Inspector:			
Jon Jones	Jones, Jon	Digitally signed by Jones, Jon Date: 2025.01.16 14:24:30 -09'00'	
	EPA Region 10	jones.jon@epa.gov	(907) 227-4316
Supervisor Review:			
Matt Quarterman	MATTHEW QUARTERMAN	Digitally signed by MATTHEW QUARTERMAN Date: 2025.01.21 14:43:55 -08'00'	
	EPA Region 10	quarterman.matthew@epa.gov	(206) 553-2146

SECTION I – INTRODUCTION

Site Entry and Purpose of the Inspection

Type of inspection: Compliance Evaluation Inspection (CEI)

EPA Region 10 Lead Inspector, Jon Jones, arrived at the Phillips 66 Co Ferndale Facility (the “Site” or “Facility”), located at 3901 Unick Rd, Ferndale, WA 98248, at 08:52 AM (PT) on 05/16/2023 for an unannounced inspection.

EPA Region 10 Lead Inspector presented credentials to and informed Mr. Lester Keel, Environmental Team Lead that this was an EPA Region 10 inspection to determine compliance with Resource Conservation and Recovery Act (RCRA).

The facility was inspected to ensure compliance with Washington's federally authorized hazardous waste regulations found at Washington Administrative Code (WAC) 173-303. Specifically, the inspection assessed compliance with WAC 173-303-573 universal waste management standards, WAC 173-303-515 requirements for management of used oil, and WAC 173-303-170 through 230 standards for hazardous waste generators. The inspection was conducted as a core program requirement for fiscal year 2023.

This report is based on information supplied by Phillips 66 Co Ferndale Facility representatives, observations made by the EPA Region 10 inspector, and records and reports maintained by the facility and its HQ including, but not limited to: direct observations made by the EPA Region 10 Inspector(s), photographs taken by EPA Region 10 inspector(s), physical evidence collected by the EPA Region 10 inspector(s), measurements or samples taken by EPA Region 10 inspector(s), verbal or written statements made by information supplied by the facility representatives during or subsequent to the on-site Inspection, and materials, processes, data, photographs, or documents shown, demonstrated, or submitted to the EPA Region 10 inspector(s) by the facility representatives during or subsequent to the on-site Inspection. In addition, information gathered prior to or subsequent to the Inspection from a review of USEPA, State, and public records may be included in this report.

Attendees

Title/Organization	Name	Phone	Email	Opening Conf.	Closing Conf.
Lead Inspector/EPA Region 10	Jon Jones	(907) 271-6329	jones.jon@epa.gov	Yes	Yes
RCRA Inspector /R10 EPA	Matt Quarterman	(206) 553-2146	quarterman.matthew@epa.gov	Yes	No
RCRA Inspector/ EPA NEIC	Jackie Vega	(303) 312-6681	vega.jackie@epa.gov	Yes	No
Health, Safety, and Environmental (HSE) Manager/Phillips 66 Ferndale Refinery	Vivek Gopal	(360) 384-8562	vivek.gopal@p66.com	Yes	No
Environmental Team Lead/Phillips 66 Ferndale Refinery	Lester Keel	(360) 384-8375	lester.w.keel@p66.com	Yes	No
WA Dept. of Ecology/Environmental Engineer	Greg Gould	(360) 819-6426	greg.gould@ecy.wa.gov	Yes	No
WA Dept. of Ecology	Liem Nguyen	(360) 790-4730	liem.nguyen@ecy.wa.gov	Yes	No
Environmental Specialist (Water)/Phillips 66 Ferndale Refinery	Elisa De Los Reyes		elisa.delosreyes@p66.com	Yes	No
Environmental Specialist/Phillips 66	Joe Sumera		joe.e.sumera@p66.com	Yes	No

Ferndale Refinery					
Environmental Specialist/Phillips 66 Ferndale Refinery	Greta Gardiner			Yes	No

Opening Conference

We arrived at the site and met with the receptionist. We signed the visitor log and received visitor badges. Mr. Lester Keel, Environmental Team Leader, arrived a short time later and met with us in the reception area. Mr. Keel had all of us watch a short safety video and after viewing it, he had us follow him into the site's conference room for the start of the opening conference.

We presented our credentials and exchanged business cards with facility personnel and stated once again that we were there to conduct a routine RCRA compliance evaluation inspection of the site. The table above presents all the inspection opening and closing conference participants.

During the opening conference, we told site personnel that we want to conduct a walkthrough inspection of the site including, but not limited to, the permitted long-term hazardous waste storage area, all of the site's central accumulation areas (CAAs), satellite accumulation areas (SAAs), onsite laboratories, and areas with contractor activities. We also requested a tour of the site's Waste Water Treatment Plant (WWTP).

During the inspection we looked at the site's processes, in addition to hazardous waste management practices, generation points, and accumulation areas. We looked for wastes that site representatives had not yet identified or designated as hazardous. We also observed the site's universal waste and used oil management.

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

Facility/Site Information

Number of employees	Approximately 287 employees and 150 contractors
Length of Facility at Location	Since 1954. Phillips 66 began operating at the facility in February 2001.
Operating Hours	24 hours a day, 7 days a week, 365 days a year.
Safety Training Provided to Inspector(s)?	Yes
Size of Facility	Approximately 850 acres
What type of generator facility notified?	Large Quantity Generator (LQG) and Operating Treatment, Storage and Disposal Facility (TSDF) for storage of hazardous waste
What type of generator facility verified as?	Verified as LQG and Operating TSDF for storage of hazardous waste by both Mr. Keel and Mr. Sumera
Weather Conditions	Day 1 – Sunny and hot, Day 2 – Sunny and hot, Day 3 – Sunny and hot

Process Description

The Ferndale Refinery is located on Puget Sound in Ferndale, Washington, approximately 20 miles south of the U.S.-Canada border. Activities include crude distillation, naphtha reforming, fluid catalytic cracking, alkylation and hydrosulfurization. The refinery produces a high percentage of transportation fuels. Other products

produced include residual fuel oil, which is supplied to the northwest marine bunker fuel market. Most of the refined petroleum products are distributed to customers in the northwest United States by pipeline and barge.

A review of the previous WA Dept. of Ecology inspection reports indicated that the following wastes were routinely generated at the site:

- Lab titrations - D002, D007, D009, D011, D018
- Oily solids - F037
- Spent parts washer solvent (150) - D039
- Ammonia test tube liquids (WWTP tests) - D002, D009
- Waste paint/solvents - D001, D035, F003, F005
- Contaminated PPE/debris (Bundle cleaning, demo of process sewer lines, and tank cleaning) - F037, K169
- Spent solvent from shops - D006, D007, D008, D009, D039
- Reformer media w/benzene - D018
- Iron sulfide clean-up debris - D003
- Sandblast media w/lead - D008
- Sandblast media w/cadmium - D006
- Aerosol paint waste - D035, D039, D040, D001, D018
- Lead contaminated solids - D008
- Spent catalysts - D008
- Spent platinum catalyst - D018
- Waste batteries and lamps - managed as universal waste
- Used oil - recycled in refinery process

Building(s)

Building/Area/Sub-area	Process Description	Area of Concern
Admin Conference Room		No
Brinderson Laydown yard	Contractor laydown area with SAA.	Yes
J.H. Kelly Laydown yard	Contractor laydown area with SAA	Yes
Lab	Quality Assurance (QA) lab testing	Yes
Fume Hood FH-06/EAV-06	SAA - glass waste containers holding waste acids/solvents	Yes
Fume Hood FH-15/EAV-15	SAA - Spent/used Draeger tubes	Yes
North Connex	New Chemical Storage	Yes
Optical Emission Spectrometer	SAA - waste Inductively Coupled Spectrometry (ICP) Solvent (Xylene) D001, F003	Yes
South Connex	Storage area for lab samples	Yes
Mills lay down yard	Contractor laydown area with SAA	Yes
Off Plot Control Room		Yes
Old Knock Engine Lab		Yes
Area outside, behind the Old Engine Knock Lab		Yes
Refinery	Crude distillation, naphtha reforming, fluid catalytic	Yes

	cracking, alkylation and hydrodesulfurization. Production of transportation fuels and residual fuel oil.	
900 pad	Hazardous waste CAA (<90-day)	Yes
Spent carbon cannister area	Spent cannisters kept across from 900 pad, between 900X2 and 900X3.	No
900X3 Tank		No
Area adjacent to 900X3 tank	CAA for roll-off containers	No
Area across from the 900 Pad		Yes
Area between 900X1 and 900X3 Tanks		Yes
Bundle cleaning pad (Main slab)	Bundles are pressure washed. Solids are collected and containerized. Liquids drain to the oily water sewer. Any solids that get into the drain end up at the WWTP equalization tanks.	Yes
Catalyst bunkers	Area, adjacent to the permitted hazardous waste storage area, where spent catalyst is accumulated.	No
Permitted RCRA storage site	Long term storage (>90-day) of hazardous waste.	Yes
Spent sandblast area	Open accumulation area for spent sandblast media from multiple projects.	Yes
Used oil pad	Used oil accumulation area.	Yes
Spent carbon storage area		Yes
Spent fluorescent lamp storage		Yes
The Mills	Contractor area with SAA.	Yes
Waste Water Treatment Plant (WWTP)		Yes
Lift Station	Lift station pumps water to 900X3 tank. If overwhelmed, discharges to X40 tank. If X40 tank is overwhelmed, discharge goes to spill pond.	No
Spill Basin	Captures storm water if either X40 tank is overwhelmed and/or all of the facility's 900 tanks (1,2, or 3) are full.	Yes
Western Refinery Service Warehouse	Contractor area.	Yes
Area adjacent to, and outside the WRS Warehouse	Waste aerosol SAA	Yes

SECTION II – OBSERVATIONS**Building:** Refinery/Permitted RCRA storage area**Observation #:** JJ1-OB-001**Date:** 05/16/2023**Contains AOC:** Yes**Contains CBI:** No**Person Interviewed:** Joe Sumera**Title:** Environmental Specialist

During the inspection of the site's permitted RCRA storage area (TSD), we were told by site personnel that Mr.

John Rogers, a contractor with Western Refinery Service (WRS) performs all of the sampling and conducts all of the weekly hazardous waste inspections.

While inspecting the containers of hazardous waste that were stored in the permitted area, we saw a 55-gallon hazardous waste satellite accumulation area (SAA) container that held waste aerosols. At the time of the inspection, this 55-gallon storage container of waste aerosols was not closed. The type of lid on the container did not allow for complete closure. I explained to facility personnel that container lids were required to make a complete seal with the container. The failure for the container to close is due to a design flaw. The swinging door does not make a complete seal when in the closed position. A noticeable gap can be seen around the entire swinging door and the lid, even when the swinging door appears to be in the closed position.

We also saw a 20 cubic yard roll-off container that was labeled "Pending Analysis" and dated 4/25/23. At the time of the inspection, the roll-off container was marked with a hazardous waste label and National Fire Protection Association (NFPA) hazard/risk label but was not closed. There were clear gaps between the lid and the top of the roll-off. There was foam sealant between the lid and the roll-off that had been applied, in an attempt to seal the lid; however, some of the foam sealant was no longer in place and caused gaps between the lid and the roll-off. During the inspection, we asked for a copy of the analytical results.

We also saw two 55-gallon containers that were labeled as hazardous waste but were not marked with hazard/risk indicators. One of the containers was marked as being "4D 200 Material" dated 9/28/22 and the other was marked as "Orifice chamber catalyst - pending analysis" dated 9/29/22. I explained that wastes designated as "Pending Analysis" were required to be labeled or marked with a hazard/risk indicator and the words "Hazardous Waste." I went on to say that if they did not know what the hazard/risk was associated with the waste, they should apply a hazard/risk marking associated with what they are having the waste tested for, such as "Toxic" if they're running Toxicity Characteristic Leaching Procedure (TCLP) or "Ignitable" if they are running flashpoint.

We also saw a 55-gallon waste storage container that was labeled as "Lead contaminated spent abrasive with water." The container was marked with a hazardous waste label and a hazard/risk indicator; however, the container was marked with an accumulation start date (ASD) of 3/22/22. The container of hazardous waste had been in storage at the site's permitted long-term storage area (TSD) for greater than a year. At the time of the inspection, the container had been in storage at the site for 420 days.

While still inspecting the permitted storage area, we observed a container of waste hexavalent chrome that had less than 30 inches of aisle space between it and a waste 20 cubic yard roll-off container. The distance between the containers was measured with a tape measure during the inspection and that distance was determined to be only 22 and 3/4 inches. Site personnel moved the container during the inspection creating the 30 inches of separation.

On 6/7/23, the site sent an email that included a link to a SharePoint site they created, where they uploaded documents and files that we had requested during the inspection. The site had also uploaded an inspection response to some of the areas of concern that were identified during the inspection. In their inspection response, the site addressed the hazardous waste SAA containers of waste aerosol cans, located throughout the site, that were not closed. In their response the site stated:

"Per guidance provided by the Washington State Department of Ecology, because the aerosol cans themselves are a container, the drum that they are stored in does not need to be closed (email attached). In addition, per guidance provided by the EPA on December 3, 2009 (see attached Guidance on 40 CFR 264.173(a) and 265.173(a): Closed Containers pages 10 and 11) for containers storing hazardous wastes (such as aerosol cans), containers with a self-closing swinging door may also be appropriate."

The site is not using drum lids with self-closing swinging doors. The lids with swinging doors that are being used at the site are an old-style type of lid used when a site wants to use a 55-gallon open top drum as a trash

receptacle. The swinging door does not make a complete seal when in the closed position. A noticeable gap can be seen around the entire swinging door and the lid, even when the swinging door appears to be in the closed position. There are similar type lids with actual self-closing swinging doors that are spring loaded, and seal when closed. I made mention of these lids with the spring-loaded doors during the inspection.

In the guidance (Email) from Ecology, provided by the site, Ms. Mindy Collins, Ecology states the following:

“Hi Eric!

Aerosol can management – well, if they are not punctured and you are accumulating them awaiting puncturing, the can itself is a container, so the drum or bin they are placed in does not need to be closed. You must move them to a final accumulation area when you reach 55 gallons if not puncturing. I suppose you could argue that the waste within the container is the only thing that counts towards the 55 gallons, but that would be a tough sell. If I saw an open drum in the central accumulation area, labeled to indicate it was intended for shipment, and it was open, I would want to see it closed.

Does that help?

Mindy Collins

Hazardous Waste Compliance Team Lead

Hazardous Waste and Toxics Reduction

WA Department of Ecology, Bellingham Field Office

(360) 255-4383”

The idea of each waste aerosol can, being a container was brought up during the inspection by Mr. Keel. During the inspection, I told Mr. Keel that if they wanted to treat each waste aerosol can as a container, then each waste aerosol can would need to be labeled with the words “Hazardous Waste” and be marked with a hazard indicator.

Photo(s)

1. [DSCN0672.JPG](#)
2. [DSCN0673.JPG](#)
3. [DSCN0674.JPG](#)
4. [IMG_1004.jpg](#)
5. [IMG_1005.jpg](#)
6. [IMG_1011.jpg](#)
7. [IMG_1007.jpg](#)
8. [IMG_1012.jpg](#)
9. [IMG_1006.jpg](#)
10. [IMG_1013.jpg](#)
11. [IMG_1018.jpg](#)
12. [IMG_1016.jpg](#)
13. [IMG_1019.jpg](#)
14. [IMG_1015.jpg](#)
15. [IMG_1014.jpg](#)
16. [IMG_1020.jpg](#)
17. [IMG_1022.jpg](#)
18. [IMG_1017.jpg](#)
19. [IMG_1021.jpg](#)
20. [IMG_1023.jpg](#)
21. [IMG_1024.jpg](#)
22. [IMG_1027.jpg](#)
23. [IMG_1026.jpg](#)
24. [IMG_1025.jpg](#)
25. [IMG_1037.jpg](#)
26. [IMG_1036.jpg](#)
27. [Distance Between Rows.jpg](#)
28. [Drum Hazard Indicator \(1\).jpg](#)
29. [Drum Hazard Indicator \(2\).jpg](#)

Building: Refinery/Spent sandblast area**Observation #:** JJ1-OB-002**Date:** 05/16/2023**Contains AOC:** Yes**Contains CBI:** No**Person Interviewed:** Joe Sumera**Title:** Environmental Specialist

After leaving the site's permitted hazardous waste storage area, we went to their spent sandblast media accumulation area. According to Mr. Sumera:

- The area contains spent sandblast media from multiple projects at the refinery.
- The piles of spent sandblast media are comingled and then sampled prior to disposal.
- The spent sandblast media goes to Columbia Ridge for disposal and should be non-hazardous.
- Whether the spent sandblast media is hazardous or non-hazardous, it gets loaded into a 20 cubic yard roll-off container for disposal.

We observed piles of spent sandblast media on a pad and some on the ground. Spent sandblast media is placed into supersacks and then brought to the pad and then dumped into the pad area. The facility accumulates the sandblast media until there is enough to fill a roll-off container and then a composite sample is taken for analysis.

During the inspection, I told Mr. Sumera that waste determinations were required to be made at the point of generation. I explained to him that it would be possible to have a pile of spent sandblast media that might be a hazardous waste and it could sit there in accumulation for weeks, if not months, without being containerized, labeled, or inspected weekly. I also said that by taking a grab sample from each pile and mixing them together for a sample to send to the lab, his facility could be inadvertently diluting the sample.

On 6/7/23, the site sent an email that included a link to a SharePoint site they created, where they uploaded documents and files that we had requested during the inspection. The facility uploaded some grab sample analytical for spent sandblast media.

Photo(s)

1. [DSCN0675.JPG](#)
2. [DSCN0676.JPG](#)
3. [IMG_1038.jpg](#)
4. [IMG_1039.jpg](#)

Building: Refinery/Catalyst bunkers

Observation #: JJ1-OB-003 **Date:** 05/16/2023 **Contains AOC:** No **Contains CBI:** No

Person Interviewed: Joe Sumera **Title:** Environmental Specialist

After leaving the spent sandblast area, we went to the Catalyst Bunkers, adjacent to the permitted storage area. While in this area, we observed what Mr. Sumera told us were piles of Purge Treatment Unit (PTU) catalyst generated during blowdown of the scrubbers. Mr. Sumera described the catalysts as support bed and miscellaneous catalysts, and that they are non-hazardous. He does not keep a log but would have notes about the spent catalysts.

During the inspection, I asked Mr. Sumera to provide us with a list of the site's various catalysts and where they were generated in the refinery. On 6/7/23, the site sent an email that included a link to a SharePoint site they created, where they uploaded documents and files that we had requested during the inspection. Information regarding the facility's catalysts was uploaded to the site.

Photo(s)

1. [DSCN0678.JPG](#)
2. [DSCN0677.JPG](#)
3. [IMG_1040.jpg](#)
4. [IMG_1041.jpg](#)

Building: Refinery/Used oil pad

Observation #: JJ1-OB-004 **Date:** 05/16/2023 **Contains AOC:** Yes **Contains CBI:** No

Person Interviewed: Joe Sumera **Title:** Environmental Specialist

After leaving the Catalyst Bunkers, we headed to the Used Oil Pad. While we inspected the Used Oil Pad, we

saw five, 55-gallon containers that held varying amounts of used oil. At the time of the inspection, these five, 55-gallon containers, that held used oil, were not closed.

Mr. Sumera told us that the used oil generated at the site is reprocessed on-site. Mr. Sumera said he thought it was rerun into slops. He said there were at least three slop oil tanks (#92, #98, and #99) in the wastewater area. We noticed that several of the containers were marked with hazard/risk indicators, but Mr. Sumera said there were no hazards associated with the used oil.

Following the inspection, the site uploaded a corrective action photo to the site's Share Point site that documents the closure of the used oil containers. This photo from the facility was uploaded to the photolog of this inspection report.

After inspecting the used oil pad, we broke for lunch.

Photo(s)

1. [IMG_1042.jpg](#)
2. [IMG_1046.jpg](#)
3. [IMG_1043.jpg](#)
4. [IMG_1045.jpg](#)
5. [IMG_1044.jpg](#)
6. [IMG_1047.jpg](#)
7. [Used Oil Drums Closed.jpg](#)

Building: Refinery/Bundle cleaning pad (Main slab)

Observation #: JJ1-OB-005 **Date:** 05/16/2023 **Contains AOC:** Yes **Contains CBI:** No

Person Interviewed: Joe Sumera **Title:** Environmental Specialist

After we returned from lunch, we went to inspect the bundle cleaning pad at the Main Slab. Ms. Greta Gardner, Environmental Specialist with Phillips 66, joined the inspection team after lunch.

While at the bundle cleaning pad, we asked Mr. Keel to describe the bundle cleaning operations. Mr. Keel stated:

- Heat exchanger bundles are brought to the pad and cleaned with a pressure washer.
- The solids generated in the process are drummed up (K050 waste).
- The liquids generated drain to the refinery's oily water sewer.
- Solids that get into the oily water sewer end up in the WWTP equalization tanks.
- Solids cleaned out of the WWTP equalization tanks is a F037 waste.

While on the Main Slab, we observed a 55-gallon waste aerosol SAA container. At the time of the inspection, the container was empty; however, the container was not closed. The container had an attached lid with a swinging door that wasn't designed to be used with a container holding hazardous waste, as it doesn't make a complete seal when closed. The failure for the container to close is due to a design flaw. The swinging door does not make a complete seal when in the closed position. A noticeable gap can be seen around the entire swinging door and the lid, even when the swinging door appears to be in the closed position.

We also observed waste and debris on the pad that looked like dried waste solids (K050) from the bundle cleaning process. According to facility personnel, contractor personnel perform the bundle cleaning. During the inspection of the bundle cleaning area, I asked site personnel for a copy of their bundle cleaning

procedures/standard operating procedures (SOP).

We also observed a round pan, that looked like an oil drain pan, that contained a nasty looking unknown waste that was both black and brown in color. At the time of the inspection, site personnel did not know what the contents of the pan were.

We saw a waste aerosol can on the bundle cleaning pad that was not labeled with the words "Hazardous Waste" and was not marked with a hazard/risk indicator. We also saw a box containing a couple of spent waste aerosol cans. At the time of the inspection, these two waste aerosol cans were not labeled with the words "Hazardous Waste" or a hazard/risk indicator.

On 6/7/23, the site sent an email that included a link to a SharePoint site they created, where they uploaded documents and files that we had requested during the inspection.

Photo(s)

1. [DSCN0679.JPG](#)
2. [DSCN0680.JPG](#)
3. [DSCN0681.JPG](#)
4. [DSCN0682.JPG](#)
5. [DSCN0683.JPG](#)
6. [DSCN0685.JPG](#)
7. [DSCN0686.JPG](#)
8. [DSCN0687.JPG](#)
9. [DSCN0688.JPG](#)
10. [DSCN0684.JPG](#)

Building: Refinery/900 pad

Observation #: JJ1-OB-006

Date: 05/16/2023

Contains AOC: Yes

Contains CBI: No

Person Interviewed: Joe Sumera

Title: Environmental Specialist

After leaving the Main Slab, bundle cleaning pad, we went to the 900 pad. The site's 900 pad is designated as a central accumulation area (CAA) for the accumulation of hazardous waste.

While at the 900 pad, we saw a 20 cubic yard roll-off dewatering box that contained F037 waste and was dated 3/21/23. At the time of the inspection, the roll-off was not closed.

Following the inspection, the site uploaded a corrective action photo to the site's Share Point site that documents the closure of the 20 cubic yard roll-off dewatering box. This photo from the site was uploaded to the photolog of this inspection report.

While in this CAA, we also saw a 55-gallon container and a five-gallon bucket. At the time of the inspection, the 55-gallon container was marked with the word "Empty" and was full of something, but site personnel did not know what the container held. The five-gallon bucket was approximately 3/4 full of another unknown. I told site personnel that a waste determination was probably in order for the contents of these two containers. At the time this inspection report was completed, this area of concern remains outstanding.

While still on the 900 pad, we saw two Baker tanks. The light blue Baker tank contained spent amine and was dated 1/23/23. At the time of the inspection, a hose connected to the tank was running to a nearby drain and discharging to the oily water sewer.

Photo(s)

1. [DSCN0689.JPG](#)
2. [DSCN0690.JPG](#)
3. [DSCN0691.JPG](#)
4. [DSCN0692.JPG](#)
5. [DSCN0693.JPG](#)
6. [DSCN0694.JPG](#)
7. [DSCN0695.JPG](#)
8. [DSCN0696.JPG](#)
9. [DSCN0697.JPG](#)
10. [Screen Box Closed.jpg](#)

Building: Refinery/Area across from the 900 Pad/Area between 900X1 and 900X3 Tanks

Observation #: JJ1-OB-007

Date: 05/16/2023

Contains AOC: Yes

Contains CBI: No

Person Interviewed: Joe Sumera

Title: Environmental Specialist

Following our inspection of the 900 Pad, we saw a vapor collection system just across from the pad, between the 900X1 and 900X3 tanks. According to Mr. Keel, the system of carbon cannisters collects vapor coming off of the oily water sewer. There is an organic vapor analyzer that determines breakthrough of the carbon filters at 50 parts per million (ppm) VOC and 1 ppm of benzene. At that point, the spent carbon cannisters are replaced with new ones. Mr. Keel told us that he believed the spent cannisters were exempt because they were sent off for reclamation.

During the inspection we asked Mr. Keel to provide us with information regarding the deactivation/reclamation of the spent cannisters as well as copies of paperwork associated with the reclamation.

On 6/7/23, the site sent an email that included a link to a SharePoint site they created, where they uploaded an inspection response to address our questions about the solid/hazardous waste status of spent carbon and whether the thermal regeneration/desorption process fit the definition of reclamation. In the site's response they stated:

"As the spent carbon is a sludge from an air pollution control device that would only exhibit a characteristic of a hazardous waste, and the material is reclaimed through thermal regeneration/desorption, the spent carbon is not considered a solid waste (Per 40 CFR 261.2(c)(3) and WAC 173-303-046(5)(C)). Since the spent carbon is not considered a solid waste, it cannot be considered a hazardous waste. Additionally, the thermal regeneration/desorption process allows for the complete beneficial reuse of the material. The reclaimed material is mostly sent back to the site for reuse. In the event it is not returned to the site, the material is used for other applications, never disposed of. Per the EPA definition of reclamation, a material is reclaimed if it is "processed to recover a usable product, or if it is regenerated". For more information, see attached RO 11143 and RO 11089 (specifically Footnote 2)."

While still across from the 900 Pad, we also saw a 20 cubic yard roll-off containing waste 7C-111 Catalyst that was labeled with a hazardous waste marking that was also marked "Pending Analysis." At the time of the inspection, the roll-off was not dated, not closed, and was not marked with a hazard indicator.

Following the inspection, the site uploaded a corrective action photo to the site's Share Point site that documents the addition of an accumulation start date and hazard indicator to the labeling/markings of the 20 cubic yard roll-off containing waste 7C-111 Catalyst that was marked "Pending Analysis." This corrective action photo was uploaded to the Photolog that accompanies this report.

Adjacent to the 900X3 wastewater tank, we also saw a second 20 cubic yard roll-off that was labeled as containing hazardous waste contaminated PPE and debris, with waste codes F037 and D008. At the time of the inspection, the roll-off was not closed.

The site has yet to respond regarding the two, 20 cubic yard roll-off containers not being closed during the inspection.

Photo(s)

1. [DSCN0698.JPG](#)
2. [DSCN0699.JPG](#)
3. [DSCN0700.JPG](#)
4. [DSCN0701.JPG](#)
5. [DSCN0702.JPG](#)
6. [DSCN0703.JPG](#)
7. [DSCN0704.JPG](#)
8. [7C-111 Roll Off Labeling.jpg](#)

Building: Admin Conference Room

Observation #: JJ1-OB-008 **Date:** 05/17/2023 **Contains AOC:** No **Contains CBI:** No

Person Interviewed: Joe Sumera **Title:** Environmental Specialist

We returned to the site at 0830 hours on 5/17, 2023 for the second day of the inspection and started the day with a discussion about the site's wastewater treatment system. During the discussion we were joined by Mr. Eric Libolt, Whatcom Environmental Services.

A wastewater treatment diagram from page 59 of the CWA NPDES permit was provided for discussion. The main treatment units for the wastewater treatment system include lift stations for the phenolic sewer and oily sewer, spill basin, 900 series oil/water separation tanks, API separators, slop oil recovery tanks, WEMCO induced gas flotation units, mix bed biofilm reactors, activated sludge basins, clarifiers, stabilization basin, final holding basin, and storm basin.

Last summer, tank 900X2 was taken out of commission for cleaning out sludge. The sludge was shipped as F037 to Evergreen in Canada and CWM in Oregon. Samples are collected monthly of the discharge from the WEMCO Induced Gas Floatation Units for benzene.

Building: Off Plot Control Room

Observation #: JJ1-OB-009 **Date:** 05/17/2023 **Contains AOC:** Yes **Contains CBI:** No

Person Interviewed: Joe Sumera **Title:** Environmental Specialist

Following the Wastewater Treatment discussion, we resumed the inspection and went to the Off Plot Control Room. While there we saw a 55-gallon container that was being used to accumulate waste aerosol cans. The 55-gallon SAA container of waste aerosol cans had a red, metal dome style cover attached with a swinging door opening so waste aerosol cans could be placed into the container. At the time of the inspection, the container was not closed. The failure for the container to close is due to a design flaw. The swinging door does not make a complete seal when in the closed position. A noticeable gap can be seen around the entire swinging door and the lid, even when the swinging door appears to be in the closed position.

We also saw a leaking container of what was determined by facility personnel to be, "Rail Deicer." At the time

of the inspection. I asked Mr. Sumera if he would provide me with a copy of the Safety Data Sheet (SDS) for the deicer.

On 6/7/23, the facility sent an email that included a link to a SharePoint site they created, where they uploaded an SDS for the deicer as well as an inspection response to address SAA containers of waste aerosol cans that were not closed. In their response (Addressed in greater detail in JJ1-OB-001) the facility provided EPA guidance that stated for containers storing hazardous wastes (such as aerosol cans), containers with a self-closing swinging door may also be appropriate. At the time of the inspection, the facility was not using drum lids with self-closing swinging doors.

Photo(s)

1. [IMG_1049.jpg](#)
2. [IMG_1051.jpg](#)
3. [IMG_1050.jpg](#)
4. [IMG_1052.jpg](#)
5. [IMG_1053.jpg](#)
6. [IMG_1054.jpg](#)

Building: Old Knock Engine Lab

Observation #: JJ1-OB-010

Date: 05/17/2023

Contains AOC: Yes

Contains CBI: No

Person Interviewed: Joe Sumera

Title: Environmental Specialist

Adjacent to Off Plot Control Room, we saw another small building. We were told that the building was the old Engine Knock Lab. Upon entering the building, we observed a strong odor of gasoline and heard an actively running and open fume hood. We saw an absorbent material on the floor that appeared to either be floor sweep or kitty litter that had been poured out onto the floor to absorb an apparent spill. We also saw approximately nine sealed bottles of what looked like gasoline inside the open and actively running fume hood in the lab. We started asking additional questions and Mr. Sumera went back to the control room to get someone that could answer our questions.

Mr. Sumera returned with a gentleman who introduced himself as Jeremy Chastain, Unit 2 Off Plot Field Operator. Mr. Chastain told us that there had been a gasoline spill in the lab that happened a week ago, on Tuesday (5/9/2023). We were then met by Mr. Matt Bennet, Shift Supervisor. According to Mr. Bennett they had been collecting gasoline for months, for sampling purposes, when a cabinet overheated. Power was shut down and a flow meter broke. A site glass also broke and approximately one gallon of gasoline drained out onto the floor of the lab. I asked what happened to the gasoline after sampling and Mr. Sumera said he didn't know for sure, but thought it was discharged into the oily water sewer.

At the time of the inspection, the gasoline-soaked waste absorbent had been on the floor of the lab for a week (Since last Tuesday, 5/9/2023), and was still on the floor and had not been cleaned up and containerized, allowing it to evaporate. According to Mr. Sumera, the gasoline-soaked waste absorbent would be managed as a hazardous waste.

Along with the nine sample bottles of gasoline, we also saw two, one-gallon glass bottles that had at one time contained Pentane. At the time of the inspection, these two, one-gallon containers were not closed and were inside of an open, actively running fume hood. Following the inspection, I performed a Google search for an SDS for Fisher Scientific Pentane and saw that it had a flashpoint of -56.2 °F.

On 6/7/23, the site sent an email that included a link to a SharePoint site they created, where they uploaded documents and files that we had requested during the inspection. In that request, we asked for all of the

information about this spill, including any internal reports and/or emails. The site's document upload included a corrective action photo that documents a partial clean-up of the spill. This photo from the site was uploaded to the photolog of this inspection report. The documentation of the spill was reviewed, and I saw that the spill actually occurred on 4/29/23 which was ten days prior to 5/9/23, when I was told the spill occurred. An internal email from Mr. Sumera requested a cleanup of the spill on 5/19/23, 21 days after the spill. According to the submitted documentation, the spill was partially cleaned up 5 days later, on 5/24/23.

Photo(s)

1. [IMG_1057.jpg](#)
2. [IMG_1059.jpg](#)
3. [IMG_1060.jpg](#)
4. [IMG_1055.jpg](#)
5. [IMG_1056.jpg](#)
6. [IMG_1058.jpg](#)
7. [IMG_1061.jpg](#)
8. [IMG_1062.jpg](#)
9. [Old Engine Lab \(1\).jpg](#)
10. [Old Engine Lab \(2\).jpg](#)
11. [Old Engine Lab \(3\).jpg](#)

Building: Old Knock Engine Lab/Area outside, behind the Old Engine Knock Lab

Observation #: JJ1-OB-011

Date: 05/17/2023

Contains AOC: Yes

Contains CBI: No

Person Interviewed: Joe Sumera

Title: Environmental Specialist

After leaving the Old Engine Knock Lab, I headed outside and behind the lab I saw multiple sample bottles, like those seen in the lab. Some of the sample bottles still contained what appeared to be gasoline. The contents of these sample bottles looked like the contents of the sample bottles we previously saw in the fume hood inside the lab which were confirmed to be holding gasoline. These sample bottles looked like they had been discarded behind the lab and were presumed to have been here in disarray since the closure of the lab. We later determined that the Old Engine Knock Lab had been closed for over ten years. When we were inspecting the site's main lab, we were told by Paul Stermer, Lab Manager, that the Old Engine Knock Lab was shut down 10 years ago. Along with the multiple sample bottles strewn around the area behind the lab, we also saw a discarded leather glove. I explained to Mr. Sumera that waste leather gloves fail Toxicity Characteristic Leaching Process analysis (TCLP) for Chrome (D007) and told him that a waste determination would be required for the waste glove as well as any other waste leather gloves generated at the site.

On 6/7/23, the site sent an email that included a link to a SharePoint site they created, where they uploaded documents and files that we had requested during the inspection. The site had also uploaded an inspection response to some of the areas of concern that were identified during the inspection. In their inspection response, the site addressed the clean-up of the area with photo documentation. The photos from the site were uploaded to the photolog of this inspection report.

As of the date of this inspection report, the site has not yet responded to the required waste determination for the waste leather gloves generated at the refinery.

Photo(s)

1. [IMG_1063.jpg](#)
2. [IMG_1064.jpg](#)
3. [IMG_1066.jpg](#)
4. [IMG_1067.jpg](#)
5. [IMG_1065.jpg](#)
6. [Old Engine Lab \(4\).jpg](#)
7. [Old Engine Lab \(5\).jpg](#)

Building: Mills lay down yard

Observation #: JJ1-OB-012 **Date:** 05/17/2023 **Contains AOC:** Yes **Contains CBI:** No

Person Interviewed: Joe Sumera **Title:** Environmental Specialist

While inspecting the laydown area, we saw a 55-gallon SAA container for waste aerosol cans. At the time of the inspection, the SAA container held one waste aerosol can and was not closed. This again, was a design flaw of the lids that were being used throughout the facility on containers used to accumulate waste aerosol cans. The swinging door on the domed container covers did not make a complete seal when they appeared to be in the closed position. A noticeable gap can be seen around the entire swinging door and the lid, even when the swinging door appears to be in the closed position.

On 6/7/23, the site sent an email that included a link to a SharePoint site they created, where they uploaded an inspection response to address SAA containers of waste aerosol cans that were not closed. In their response (Addressed in greater detail in JJ1-OB-001) the site provided EPA guidance that stated for containers storing hazardous wastes (such as aerosol cans), containers with a self-closing swinging door may also be appropriate. At the time of the inspection, the site was not using drum lids with self-closing swinging doors.

Photo(s)

1. [IMG_1068.jpg](#)
2. [IMG_1070.jpg](#)
3. [IMG_1069.jpg](#)
4. [IMG_1071.jpg](#)

Building: Brinderson Laydown yard

Observation #: JJ1-OB-013 **Date:** 05/17/2023 **Contains AOC:** Yes **Contains CBI:** No

Person Interviewed: Joe Sumera **Title:** Environmental Specialist

While inspecting the laydown area, we saw another 55-gallon SAA container for waste aerosol cans. At the time of the inspection, the SAA container was not closed. This again, was a design flaw of the lids that were being used throughout the facility on containers used to accumulate waste aerosol cans. The swinging door on the domed container covers did not make a complete seal when closed and were often observed not operating properly. A noticeable gap can be seen around the entire swinging door and the lid, even when the swinging door appears to be in the closed position.

On 6/7/23, the site sent an email that included a link to a SharePoint site they created, where they uploaded an inspection response to address SAA containers of waste aerosol cans that were not closed. In their response (Addressed in greater detail in JJ1-OB-001) the site provided EPA guidance that stated for containers storing hazardous wastes (such as aerosol cans), containers with a self-closing swinging door may also be appropriate.

At the time of the inspection, the site was not using drum lids with self-closing swinging doors.

Photo(s)

1. [IMG_1075.jpg](#)
2. [IMG_1072.jpg](#)
3. [IMG_1074.jpg](#)
4. [IMG_1073.jpg](#)

Building: The Mills

Observation #: JJ1-OB-014 **Date:** 05/17/2023 **Contains AOC:** Yes **Contains CBI:** No

Person Interviewed: Joe Sumera **Title:** Environmental Specialist

While inspecting "The Mills" area, we saw a 55-gallon SAA container that held oily metal shavings. The container labeling indicated that the waste carried the F037 waste code. At the time of the inspection, the 55-gallon hazardous waste SAA container was not closed. The lid was on the closed-top container; however, the drum ring was wrapped only around the lid and not around both the lid and lip of the container, holding the lid down onto the container. Due to this issue, the lid was not making a complete seal with the hazardous waste container. A noticeable gap could be seen between the lid and the top of the container.

We also saw a small, "Ridgid" brand, ~2.5-gallon bucket, beneath a pipe threader, that also contained the same waste metal shavings that we saw in the 55-gallon hazardous waste SAA container. These same waste metal shavings were also piling up, beneath the pipe threader, around the bucket. During the inspection, the ~2.5-gallon bucket containing the waste metal shavings was not labeled with the words "Hazardous Waste," marked with a hazard indicator or closed. Mr. Reed Stanley, Supervisor with Mills Electric, told us that the waste bucket gets emptied into the 55-gallon hazardous waste SAA container either weekly or bi-weekly. At the time of the inspection, the ~2.5-gallon bucket was being used as a SAA container and either weekly or bi-weekly was being emptied into the 55-gallon hazardous waste SAA container. I explained that the ~2.5-gallon bucket was the SAA container, and the 55-gallon container was actually an accumulation (90-day) container, requiring weekly hazardous waste inspections. I explained that hazardous waste could not be managed satellite to satellite.

We also saw a five-gallon container beneath the same pipe threader and adjacent to the ~2.5-gallon bucket, that was approximately 1/8 full of the same waste metal shavings. At the time of the inspection, this additional container was not labeled with the words "Hazardous Waste," marked with a hazard indicator or closed.

Just prior to leaving "The Mills", we saw another ~2.5-gallon "Ridgid" brand bucket on the floor beneath a work bench. At the time of the inspection, this additional container of waste metal shavings appeared to hold a half gallon or less of the waste metal shavings and was not labeled with the words "Hazardous Waste," marked with a hazard indicator or closed.

On 6/7/23, the site sent an email that included a link to a SharePoint site they created, where they uploaded documents and files that we had requested during the inspection. The site had also uploaded an inspection response to some of the areas of concern that were identified during the inspection. In their inspection response, the site included photos showing corrective action taken in the area. The photos from the site were uploaded to the photolog of this inspection report.

Photo(s)

1. [IMG_1077.jpg](#)
2. [IMG_1076.jpg](#)
3. [IMG_1078.jpg](#)
4. [IMG_1079.jpg](#)
5. [IMG_1081.jpg](#)
6. [IMG_1080.jpg](#)
7. [IMG_1087.jpg](#)
8. [IMG_1085.jpg](#)
9. [IMG_1082.jpg](#)
10. [IMG_1086.jpg](#)
11. [IMG_1084.jpg](#)
12. [IMG_1088.jpg](#)
13. [IMG_1083.jpg](#)
14. [Metal Shavings Area \(1\).jpg](#)
15. [Metal Shavings Area \(2\).jpg](#)
16. [Metal Shavings Area \(3\).jpg](#)
17. [Metal Shavings Area Drum.jpg](#)

Building: J.H. Kelly Laydown yard**Observation #:** JJ1-OB-015**Date:** 05/17/2023**Contains AOC:** Yes**Contains CBI:** No**Person Interviewed:** Joe Sumera**Title:** Environmental Specialist

While inspecting the laydown area, we saw another 55-gallon SAA container for waste aerosol cans. At the time of the inspection, the SAA container was not closed. This again, was a design flaw of the lids that were being used throughout the facility on containers used to accumulate waste aerosol cans. The swinging door on the domed container covers did not make a complete seal when closed and were often observed not operating properly. A noticeable gap can be seen around the entire swinging door and the lid, even when the swinging door appears to be in the closed position.

On 6/7/23, the site sent an email that included a link to a SharePoint site they created, where they uploaded an inspection response to address SAA containers of waste aerosol cans that were not closed. In their response (Addressed in greater detail in JJ1-OB-001) the site provided EPA guidance that stated for containers storing hazardous wastes (such as aerosol cans), containers with a self-closing swinging door may also be appropriate. At the time of the inspection, the site was not using drum lids with self-closing swinging doors.

While still in the area, I inspected the contents of a flammable storage cabinet. At the time of the inspection, we saw waste paint/coating being allowed to dry out and/or evaporate inside the cabinet. I asked Mr. Sumera to send me a SDS for the paint/coating being allowed to dry out and/or evaporate. This information was uploaded to the SharePoint site following the inspection.

Photo(s)

1. [IMG_1090.jpg](#)
2. [IMG_1091.jpg](#)
3. [IMG_1089.jpg](#)
4. [IMG_1094.jpg](#)
5. [IMG_1095.jpg](#)
6. [IMG_1092.jpg](#)
7. [IMG_1096.jpg](#)
8. [IMG_1097.jpg](#)
9. [IMG_1098.jpg](#)
10. [IMG_1093.jpg](#)

Building: Western Refinery Service Warehouse/Area adjacent to, and outside the WRS Warehouse

Observation #: JJ1-OB-016 **Date:** 05/17/2023 **Contains AOC:** Yes **Contains CBI:** No

Person Interviewed: Joe Sumera **Title:** Environmental Specialist

While inspecting the laydown area, we saw another 55-gallon SAA container for waste aerosol cans. At the time of the inspection, the SAA container was not closed. This again, was a design flaw of the lids that were being used throughout the facility on containers used to accumulate waste aerosol cans. The swinging door on the domed container covers did not make a complete seal when closed and were often observed not operating properly, as the swinging lid would not fully return to the closed position. A noticeable gap can be seen around the entire swinging door and the lid, even when the swinging door appears to be in the closed position.

On 6/7/23, the site sent an email that included a link to a SharePoint site they created, where they uploaded an inspection response to address SAA containers of waste aerosol cans that were not closed. In their response (Addressed in greater detail in JJ1-OB-001) the site provided EPA guidance that stated for containers storing hazardous wastes (such as aerosol cans), containers with a self-closing swinging door may also be appropriate. At the time of the inspection, the site was not using drum lids with self-closing swinging doors.

Photo(s)

1. [IMG_1101.jpg](#)
2. [IMG_1100.jpg](#)
3. [IMG_1099.jpg](#)
4. [IMG_1104.jpg](#)
5. [IMG_1103.jpg](#)
6. [IMG_1102.jpg](#)

Building: Waste Water Treatment Plant (WWTP)/Lift Station

Observation #: JJ1-OB-017 **Date:** 05/17/2023 **Contains AOC:** No **Contains CBI:** No

Person Interviewed: Joe Sumera **Title:** Environmental Specialist

Prior to the inspection of the WWTP, we continued our earlier discussion about the WWTP. A diagram was provided from the CWA NPDES permit (page 59 of 147). A copy of the sites CWA NPDES permit is included in the document log of Section VII – List of Appendices. The process wastewater flows through two separate sewers designated as the phenolic sewer and the oily sewer. The phenolic sewer is the older system, and the wastewaters have a variable pH. Wastewater from the phenolic and oily sewers are kept separate at the

beginning of the system, but they are combined and treated the same in the WWTP. The lift station has two separate chambers, one for the phenolic sewer and one for the oily sewer. Overflow from the lift stations discharges through a pipe into the spill basin. According to facility personnel, the phenolic lift station does not overflow, because the flow in that sewer is much lower than its capacity. The oily sewer does overflow occasionally. According to Liam Nguyen, WDOE, P66 has reported an overflow about 4 times in the last 3 years.

Photo(s)

1. [IMG_1105.jpg](#)
2. [IMG_1106.jpg](#)
3. [IMG_1107.jpg](#)
4. [IMG_1108.jpg](#)
5. [IMG_1110.jpg](#)
6. [IMG_1111.jpg](#)
7. [IMG_1109.jpg](#)
8. [IMG_1112.jpg](#)
9. [IMG_1158.jpg](#)

Building: Waste Water Treatment Plant (WWTP)/Spill Basin

Observation #: JJ1-OB-018

Date: 05/17/2023

Contains AOC: Yes

Contains CBI: No

Person Interviewed: Joe Sumera

Title: Environmental Specialist

During the inspection of the spill basin, we observed an area of vegetation inside the spill basin, near the water, with some very dark brown staining as well as an oily discharge we observed flowing from a black pipe into the spill basin. If this discharge is from either of the process sewers, then process wastewaters are entering the spill basin during a period that would not be from wet weather flow. This would result in the spill basin receiving wastewaters that generate F037 primary separation sludge.

P66 responded after the inspection with the following:

“After a thorough investigation, the facility has determined that the source of discharge is not from the oily water sewer. Rainfall accumulation in the southwest corner of tank 800X151 dike wall appears to have been seeping through joints in the oily water sewer piping and draining to the basin. A video inspection of the piping and downstream manhole has confirmed this area of rainfall accumulation to be the source of flow into the spill basin. The silver sheen observed accompanying the discharge was likely due to residual hydrocarbon left behind in the discharge piping after a permitted overflow event; however, biological sheen cannot be ruled out.”

Additionally, anytime that wastewater is entering the spill basin that may contain benzene, the wastewater must be sampled and analyzed to determine whether it exceeds the benzene characteristic limit (waste code D018). This must be done especially when the lift station overflows and discharges process wastewaters to the spill basin.

Photo(s)

1. [DSCN0705.JPG](#)
2. [DSCN0707.JPG](#)
3. [DSCN0708.JPG](#)
4. [DSCN0709.JPG](#)
5. [DSCN0710.JPG](#)
6. [DSCN0706.JPG](#)
7. [DSCN0711.JPG](#)
8. [DSCN0712.JPG](#)
9. [DSCN0713.JPG](#)
10. [IMG_1115.jpg](#)
11. [IMG_1117.jpg](#)
12. [IMG_1114.jpg](#)
13. [IMG_1116.jpg](#)
14. [IMG_1113.jpg](#)
15. [IMG_1118.jpg](#)
16. [IMG_1122.jpg](#)
17. [IMG_1123.jpg](#)
18. [IMG_1124.jpg](#)
19. [IMG_1132.jpg](#)
20. [IMG_1134.jpg](#)
21. [IMG_1129.jpg](#)
22. [IMG_1130.jpg](#)
23. [IMG_1126.jpg](#)
24. [IMG_1125.jpg](#)
25. [IMG_1127.jpg](#)
26. [IMG_1128.jpg](#)
27. [IMG_1131.jpg](#)
28. [IMG_1133.jpg](#)
29. [IMG_1135.jpg](#)

Building: Waste Water Treatment Plant (WWTP)**Observation #:** JJ1-OB-019**Date:** 05/17/2023**Contains AOC:** No**Contains CBI:** No**Person Interviewed:** Joe Sumera**Title:** Environmental Specialist

During the inspection, we toured the site's Wastewater Treatment Plant (WWTP) beginning where the site's sewer lines come together upgradient of the lift station and ending with the outfall from the plant. During this portion of the inspection, while viewing the discharge into the sludge stabilization pond, Inspector Vega discussed the need for a waste determination for benzene. Ms. Vega told facility personnel during the inspection that a sample for benzene should be taken following treatment and suggested that the sample could be taken from the discharge into the sludge stabilization pond.

During the inspection, site personnel provided "MBBR Out" data from 2022 that showed the discharge into the

sludge stabilization basin (sludge pond) was not characteristic for benzene.

On 6/7/23, the site sent an email that included a link to a SharePoint site they created, where they uploaded documents and files that we had requested during the inspection. The uploaded documents also included "MBBR Out" data from 2020 and 2021 that also showed the discharge into the sludge pond was not characteristic for benzene.

Photo(s)

1. [DSCN0714.JPG](#)
2. [IMG_1139.jpg](#)
3. [IMG_1138.jpg](#)
4. [IMG_1137.jpg](#)
5. [IMG_1145.jpg](#)
6. [IMG_1136.jpg](#)
7. [IMG_1144.jpg](#)
8. [IMG_1152.jpg](#)
9. [IMG_1154.jpg](#)
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11. [IMG_1149.jpg](#)
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26. [IMG_1173.jpg](#)
27. [IMG_1169.jpg](#)
28. [IMG_1172.jpg](#)
29. [IMG_1174.jpg](#)
30. [IMG_1168.jpg](#)
31. [IMG_1176.jpg](#)
32. [IMG_1175.jpg](#)
33. [IMG_1177.jpg](#)
34. [IMG_1178.jpg](#)
35. [IMG_1179.jpg](#)

Building: Lab			
Observation #: JJ1-OB-020	Date: 05/18/2023	Contains AOC: No	Contains CBI: No
Person Interviewed: Paul Stermer		Title: Lab Manager	
We returned to the site at 0830 hours on 5/18/23 and continued our inspection, beginning at the refinery			

laboratory. Shortly after our arrival at the lab, we met with Mr. Paul Stermer, Lab Manager. The following information was obtained from Mr. Stermer during our lab inspection:

- Lab samples are retained for 30 -45 days.
- Lab samples are kept in the South Connex.
- The lab does not perform any analytical testing.

Mr. Stermer had no knowledge about the gasoline samples we identified at the old knock engine lab.

Photo(s)

1. [IMG_1183.jpg](#)
2. [IMG_1182.jpg](#)
3. [IMG_1184.jpg](#)
4. [IMG_1186.jpg](#)
5. [IMG_1185.jpg](#)
6. [IMG_1187.jpg](#)
7. [IMG_1190.jpg](#)
8. [IMG_1189.jpg](#)

Building: Lab/Optical Emission Spectrometer

Observation #: JJ1-OB-021 **Date:** 05/18/2023 **Contains AOC:** Yes **Contains CBI:** No

Person Interviewed: Meredith Boxx **Title:** Chemist

While inspecting the lab, we observed a two-gallon poly container (attached to the equipment) adjacent to the Optical Emission Spectrometer. During the inspection of this area, we met Meredith Boxx, Chemist. We asked about the container and Ms. Boxx told us that the container held waste ICP solvent. She said the solvent was xylene and that it was ignitable (D001), F-listed (F003), and had a pH of 1. She told us the xylene solution was pre-made and that the generated waste also contained some of the sampled material. I asked for a copy of the xylene SDS during the inspection.

At the time of the inspection, the two-gallon waste xylene container was not labeled with the words "Hazardous Waste."

We asked how the labs' expired chemicals were managed and Ms. Boxx told us they were disposed of into the facility's oily water sewer by way of the lab drains. We asked for a drawing of the drain piping from the lab showing its connection to the oily water sewer. Ms. De Los Reyes told us that she would get us a copy of the drawing. Ms. Boxx also told us that expired standards are also disposed of down the lab drains. During the discussion of chemicals being disposed of down drains in lab sinks, Mr. Keel asked, "How does "Permit-by-Rule" come into play?" Mr. Gould, Ecology, spoke up and said, "The refinery's WWTP does not have a headworks exemption." Washington Department of Ecology regulations do not provide the RCRA headworks exemptions.

Prior to leaving the area, we asked for copies of the following documentation:

- A list of all the chemicals used in the lab, including solvents and reagents.
- A copy of the Standard Operating Procedure (SOP) for cleaning lab equipment with solvent.
- A copy of the SOP that describes what can go down the drain in lab sinks.

On 6/7/23, the site sent an email that included a link to a SharePoint site they created, where they uploaded documents and files that we had requested during the inspection. The site had also uploaded an inspection response to some of the areas of concern that were identified during the inspection. In their inspection

response, the site addressed the management of expired lab chemicals. In their response the site stated:

"Follow-up interviews with lab personnel indicated that expired lab chemicals are rarely discarded through the facility's oily water sewer (OWS). While the majority of reagents are used through the testing process, one-off expirations are typically handled as lab packs and general lab waste is handled through standard hazardous waste shipments. In the event of an incidental disposal through the OWS, the facility complies with the federal headworks exemption outlined in 40 CFR 261.3(a)(2)(iv)(E). Additionally, the facility is compliant with the Dangerous Wastes – Permit by Rule Requirements outlined in S13 of the NPDES Permit."

Photo(s)

1. [IMG_1180.jpg](#)
2. [IMG_1181.jpg](#)

Building: Lab/Fume Hood FH-06/EAV-06

Observation #: JJ1-OB-022

Date: 05/18/2023

Contains AOC: Yes

Contains CBI: No

Person Interviewed: Meredith Boxx

Title: Chemist

While still in the lab, we saw some glass containers inside of a fume hood that contained samples and/or wastes. Some were labeled as hexane and methanol and Ms. Boxx told us they were non-hazardous. There were also some sample wastes and acid wastes that were not labeled and were in close proximity to a cyanide analyzer. The wastes were not labeled with the words "Hazardous Waste", and some required a waste determination.

While in the same general area of the lab, we saw a chromatograph waste container that was on the floor and not labeled with the words "Hazardous Waste."

No information has been provided that these areas of concern have not been addressed by the facility since the inspection.

Photo(s)

1. [IMG_1188.jpg](#)

Building: Lab/Fume Hood FH-15/EAV-15

Observation #: JJ1-OB-023

Date: 05/18/2023

Contains AOC: Yes

Contains CBI: No

Person Interviewed: Meredith Boxx

Title: Chemist

While still inspecting the lab, we saw a cup of spent/used Draeger tubes inside a fume hood. At the time of the inspection, the cup containing these waste Draeger tubes was not labeled with the words "Hazardous Waste", a hazard/risk indicator, and it was not closed. No information has been provided that these areas of concern have not been addressed by the facility since the inspection. While making our way out to inspect the labs North and South Connex's, we met with Dave Nelson, Chemist. During the inspection, Mr. Nelson confirmed that the old engine knock lab was shut down 14 years ago.

Photo(s)

1. [IMG_1191.jpg](#)
2. [IMG_1193.jpg](#)
3. [IMG_1192.jpg](#)

Building: Lab/North Connex			
Observation #: JJ1-OB-024	Date: 05/18/2023	Contains AOC: Yes	Contains CBI: No
Person Interviewed: Dave Nelson		Title: Chemist	
While at the lab, we went out to inspect the contents of the North Connex. Mr. Nelson told us that the North Connex is used as a storage area for the chemicals that are used in the lab. During the inspection, it was mentioned that expired chemicals were disposed of in lab sinks that drain to the oily sewer. At the time of the inspection, the following expired chemicals were identified in the North Connex: - Expired Sodium Hydroxide 11/2021 - Expired Activator 1/2021 The disposition of these expired chemicals has yet to be addressed by the site.			
Photo(s) IMG_1200.jpg IMG_1199.jpg			

Building: Lab/South Connex			
Observation #: JJ1-OB-025	Date: 05/18/2023	Contains AOC: Yes	Contains CBI: No
Person Interviewed: Dave Nelson		Title: Chemist	
While inspecting the South Connex, we saw some lamps being accumulated. During the inspection, we saw ~10 Compact Fluorescent Lamps (CFL's) and ~60+, four-foot e fluorescent lamps. I noticed that a large number of the lamps had darkened ends which indicate that they are used/spent/waste lamps, and I asked Mr. Nelson about the lamps. Mr. Nelson told me that they were waste lamps. There were also additional boxes of lamps that Mr. Nelson said were good unused lamps. At the time of the inspection, there were two, four-foot boxes that contained ~60+ waste lamps that were not labeled with either the words, "Universal Waste - Lamps," "Waste - Lamps," or "Used Lamps" and the boxes were also not closed. There were also ~10 compact fluorescent lamps (CFLs) that were not packaged and not labeled with either the words, "Universal Waste - Lamps," "Waste - Lamps," or "Used Lamps." According to both Mr. Sumera and Mr. Nelson, the waste lamps had also been in accumulation for greater than two years. Based on the information provided the site has yet to address the areas of concern that were identified in the Labs South Connex.			
Photo(s) IMG_1203.jpg IMG_1201.jpg IMG_1202.jpg IMG_1204.jpg IMG_1205.jpg IMG_1207.jpg IMG_1206.jpg			

Building: Spent fluorescent lamp storage			
Observation #: JJ1-OB-026	Date: 05/18/2023	Contains AOC: Yes	Contains CBI: No
Person Interviewed: Joe Sumera		Title: Environmental Specialist	

After leaving the lab, we went to the site 's fluorescent lamp storage area, where according to Mr. Sumera, the facility manages and accumulates universal waste lamps. While inspecting this area of the facility, we saw the following universal wastes in accumulation:

- One box containing waste High-Pressure Sodium bulbs.
- One box containing eight-foot waste fluorescent lamps.
- One box containing four-foot waste fluorescent lamps.

At the time of the inspection, the waste lamps were in boxes and labeled with the words "Universal Waste - Lamps," but all of the boxes were not closed.

We also saw a small, sealed lead-acid battery that was wrapped with red tape and the word "BAD" was written on the tape. Mr. Sumera indicated that the batteries at the facility are also managed as universal waste. At the time of the inspection, the waste battery was not labeled with either the words "Universal Waste - Battery(ies)," "Waste - Battery(ies)," or "Used Battery(ies)."

On 6/7/23, the site sent an email that included a link to a SharePoint site they created, where they uploaded documents and files that we had requested during the inspection. The SharePoint site included photos documenting corrective action taken to address closure of the universal waste lamp containers.

Based on the information provided, the site has yet to address the area of concern related to the battery that was identified during the inspection.

Photo(s)

1. [IMG_1212.jpg](#)
2. [IMG_1210.jpg](#)
3. [IMG_1214.jpg](#)
4. [IMG_1216.jpg](#)
5. [IMG_1215.jpg](#)
6. [IMG_1211.jpg](#)
7. [IMG_1217.jpg](#)
8. [IMG_1218.jpg](#)
9. [Bulb Universal Storage \(1\).jpg](#)
10. [Bulb Universal Storage \(2\).jpg](#)

Building: Spent carbon storage area

Observation #: JJ1-OB-027 **Date:** 05/18/2023 **Contains AOC:** Yes **Contains CBI:** No

Person Interviewed: Joe Sumera **Title:** Environmental Specialist

After leaving the fluorescent lamp storage area, we went to inspect the area where the site was storing their spent carbon that was used to collect vapor from the oily water sewer. The spent carbon was being accumulated in 1-cubic yard supersacks and then, according to Mr. Sumera, it was shipped off-site to a facility to be deactivated/reclaimed. At the time of the inspection, we saw ~44 1-cubic yard supersacks that contained the spent carbon. The majority of the supersacks were being accumulated on the right side (as we entered) of the covered building behind a roped off area delineated as "Spent Carbon for Reclamation." We also saw two to three additional supersacks outside the roped off area that had been marked "SPENT" with fluorescent green spray paint. Approximately 42 of the 44 supersacks were not labeled at all and all ~44 were not labeled with the words "Hazardous Waste" or marked with hazard indicators or ASDs.

According to what Mr. Keel, had told us earlier in the inspection, there is an organic vapor analyzer that

determines breakthrough of the carbon filters at 50 parts per million (ppm) VOC and 1 ppm of benzene. Based on that information, the facility did not make an appropriate hazardous waste determination.

Also, Mr. Keel's determination, in the site's Inspection Response, that the spent carbon is exempt from a hazardous waste determination because it is reclaimed/regenerated is inaccurate. According to the definition of a carbon regeneration unit at 40 CFR 260.10 and the February 21, 1991, Federal Register (56 FR 7200), a carbon regeneration unit is a thermal treatment unit and is not an exempt reclamation unit.

We also saw a large number of supersacks on the left side (as we entered) of the building that contained reclaimed carbon as well as some small piles of loose carbon granules on the floor of the building.

At the time of the inspection, I asked Mr. Sumera to provide me with an inventory of the spent carbon in accumulation as well as information about the management of the spent carbon.

In an email, from Mr. Sumera, dated 7/5/23, he stated: "At the time of the inspection, the facility had ~80,000 pounds of spent carbon in the storage area."

After leaving the Spent Carbon Storage Area, we headed back to the facility's Environmental Office conference room to review some paperwork and conduct the inspection closing conference.

Photo(s)

1. [IMG_1225.jpg](#)
2. [IMG_1226.jpg](#)
3. [IMG_1227.jpg](#)
4. [IMG_1223.jpg](#)
5. [IMG_1224.jpg](#)
6. [IMG_1220.jpg](#)
7. [IMG_1219.jpg](#)
8. [IMG_1221.jpg](#)
9. [IMG_1222.jpg](#)
10. [IMG_1228.jpg](#)
11. [IMG_1229.jpg](#)

SECTION III – RECORDS REVIEW

Record: Any permit specific requirements		AOC: Yes
Ref #: JJ1-RR-001	Reviewed By: Jon Jones	Reviewed Date: 05/18/2023
While reviewing paperwork in the site 's conference room, prior to the closing conference, I inspected weekly hazardous waste inspection logs for the long-term permitted hazardous waste storage area. During my inspection of the weekly logs, the only years available during the inspection were years 2021 and 2022. I asked site personnel to provide the weekly hazardous waste inspection logs for 2020 and 2023 and we were told that they would send them following the site inspection. During my inspection of the 2021 and 2022 inspection logs I saw that not all of the inspections were conducted every 7 days. OSWER Directive 9523.00-10 notes for permitted facilities that "there must not be more than 6 calendar days between inspection dates." During my inspection of the 2021 and 2022 weekly logs on 5/18/23, I saw that there were 31 weekly inspections		

that exceeded the 6 days between inspections and 2 weeks where no weekly inspection was conducted.

Listed below is the week of the inspection, the date the inspection should have occurred (SHO), the date of inspection (DOI), and the number of days exceeding the 6-day requirement:

<u>Week</u>	<u>SHO</u>	<u>DOI</u>	<u># of days</u>
• 01/31/21 through 02/06/21	02/03/21	02/05/21	2
• 04/04/21 through 04/10/21	04/06/21	04/07/21	1
• 05/09/21 through 05/15/21	05/10/21	05/12/21	2
• 05/30/21 through 06/05/21	05/31/21	06/02/21	2
• 07/04/21 through 07/10/21	07/06/21	07/07/21	1
• 07/25/21 through 07/31/21	07/27/21	07/29/21	2
• 08/08/21 through 08/14/21	08/10/21	08/12/21	2
• 09/05/21 through 09/11/21	09/07/21	09/08/21	1
• 09/19/21 through 09/25/21	09/21/21	09/22/21	1
• 09/26/21 through 10/02/21	09/29/21	09/30/21	1
• 10/10/21 through 10/16/21	10/12/21	10/13/21	1
• 10/31/21 through 11/06/21	11/01/21	11/03/21	2
• 11/14/21 through 11/20/21	11/15/21	11/17/21	2
• 12/12/21 through 12/18/21	12/13/21	12/16/21	3
• 12/26/21 through 01/01/22	12/27/21	12/29/21	2
• 02/20/22 through 02/26/22	02/21/22	02/22/22	1
• 03/20/22 through 03/26/22	03/21/22	03/22/22	1
• 03/27/22 through 04/02/22	02/21/22	02/22/22	1
• 04/17/22 through 04/23/22	04/18/22	04/19/22	1
• 05/01/22 through 05/07/22	05/03/22	05/05/22	2
• 05/29/22 through 06/04/22	(No weekly inspection was conducted.)		
• 06/05/22 through 06/11/22	06/06/22	06/08/22	2
• 06/19/22 through 06/25/22	06/20/22	06/21/22	1
• 07/03/22 through 07/09/22	07/04/22	07/06/22	2
• 07/24/22 through 07/30/22	07/26/22	07/28/22	2
• 08/07/22 through 08/13/22	08/08/22	08/12/22	5
• 08/21/22 through 08/27/22	08/24/22	08/26/22	2
• 09/04/22 through 09/10/22	(No weekly inspection was conducted.)		
• 11/06/22 through 11/12/22	11/08/22	11/09/22	1
• 11/13/22 through 11/19/22	11/16/22	11/17/22	1
• 11/27/22 through 12/03/22	11/30/22	12/01/22	1
• 12/18/22 through 12/24/22	12/19/22	12/20/22	1
• 12/18/22 through 12/24/22	12/19/22	12/20/22	1
• 12/25/22 through 12/31/22	12/27/22	12/28/22	1

Following the inspection, I received an email from Mr. Sumera on 6/7/23 that included a link to a Phillips 66 SharePoint site that contained documentation requested during the inspection. The remaining weekly hazardous waste inspection logs, covering 2020 and 2023, were posted on the SharePoint site. I downloaded the weekly inspection logs and after inspecting them, I saw that there were another 10 weekly inspections that exceeded the 6 days between inspections and another 4 weeks where no weekly inspection was conducted.

Listed below is the week of the inspection, the date the inspection should have occurred (SHO), the date of inspection (DOI), and the number of days exceeding the 6-day inspection requirement:

<u>Week</u>	<u>SHO</u>	<u>DOI</u>	<u># of days</u>
• 05/03/20 through 06/06/20	06/02/20	06/03/20	1
• 06/07/20 through 06/13/20	06/10/20	06/11/20	1
• 08/02/20 through 08/08/20	08/03/20	08/05/20	2
• 08/16/20 through 08/22/20	(No weekly inspection was conducted.)		
• 08/23/20 through 08/29/20	(No weekly inspection was conducted.)		
• 10/04/20 through 10/10/20	10/06/20	10/07/20	1
• 11/01/20 through 11/07/20	11/04/20	11/05/20	1
• 11/29/20 through 12/05/20	11/30/20	12/02/20	2
• 12/27/20 through 01/02/21	(No weekly inspection was conducted.)		
• 01/01/23 through 01/07/23	(No weekly inspection was conducted.)		
• 01/29/23 through 02/04/23	01/30/23	01/31/23	1
• 02/26/23 through 03/04/23	02/27/23	02/28/23	1
• 03/19/23 through 03/25/23	03/20/23	03/21/23	1
• 04/16/23 through 04/22/23	04/17/23	04/19/23	2
Record: Inspections			AOC: Yes
Ref #: JJ1-RR-002	Reviewed By: Jon Jones		Reviewed Date: 05/18/2023
While inspecting the weekly hazardous waste inspection logs for the facility's CAA, I saw that weekly inspections were not conducted for the following seven (7) weeks:			
• August 16-22, 2020 • August 23-29, 2020 • December 27, 2020, through January 2, 2021 • May 29 through June 4, 2022 • September 4-10, 2022 • January 1-7, 2023 • February 5-11, 2023			
Record: LDR Notices/Documents			AOC: Yes
Ref #: JJ1-RR-003	Reviewed By: Jon Jones		Reviewed Date: 05/18/2023
Prior to the closing conference, we inspected some of the site 's hazardous waste manifests and accompanying LDRs. During this inspection we saw that when the site shipped F037/F038 waste offsite, the site did not include the waste code for benzene (D018) on the following manifests and their accompanying LDRs, failing to make an accurate waste determination. The following 84 manifests and their accompanying LDRs do not contain the waste code D018 for Benzene.			
#001695620JJK			
#001695621JJK			
#001695622JJK			
#001695623JJK			
#001695624JJK			
#001695625JJK			
#001695626JJK			
#001695628JJK			
#001695629JJK			
#001695630JJK			
#001695634JJK			

#001695636JJK
#001695637JJK
#001695600JJK
#001695601JJK
#001695602JJK
#001695603JJK
#001695604JJK
#001695605JJK
#001695612JJK
#001695613JJK
#001695614JJK
#001695616JJK
#001695617JJK
#001695618JJK
#001695619JJK
#001695889JJK
#001695885JJK
#001695677JJK
#001695891JJK
#001695882JJK
#001695895JJK
#001695898JJK
#019234934JJK
#019234937JJK
#015869056FLE
#015869057FLE
#015869054FLE
#015869055FLE
#015869057FLE
#015869058FLE
#015869059FLE
#015869060FLE
#015869061FLE
#015869062FLE
#015869063FLE
#015869065FLE
#015869067FLE
#015869069FLE
#015869071FLE
#015869073FLE
#015869075FLE
#015869100FLE
#015869076FLE
#015869077FLE
#015869078FLE
#015869079FLE
#015869080FLE
#015869081FLE
#015869082FLE
#015869083FLE
#015869084FLE

#015869085FLE
#015869086FLE
#015869087FLE
#015869088FLE
#015869089FLE
#015869090FLE
#015869091FLE
#015869092FLE
#015869094FLE
#015869095FLE
#015869096FLE
#015869097FLE
#015869098FLE
#015869099FLE
#015869101FLE
#015869102FLE
#015869110FLE
#015869168FLE
#015869169FLE
#015869170FLE
#015869171FLE
#015869172FLE

The D018 (benzene) waste code will make the waste subject to the universal treatment standards in 40 CFR §268.48 for any underlying hazardous constituents. These additional constituents are not applicable to the F037 listed waste code and are brought in by the D018 waste code. The Generator Paperwork Requirements Table in 40 CFR §268.7 requires the D018 characteristic waste code for benzene to be included on the LDR. The first 6 waste codes are required for the manifest, as required by the manifest instructions.

Document(s)

1. #001695885JJK.pdf
2. #015869054FLE, 055, 075, 076, 077, 078, 079, 080, 081, 082.pdf
3. #015869083FLE, 084, 085, 086, 087, 088, 089.pdf
4. #015869090FLE, 091, 092, 094, 095, 096, 097, 098, 099.pdf
5. #001695677JJK.pdf
6. #015869056FLE.pdf
7. #015869057FLE.pdf
8. #015869058FLE.pdf
9. #015869059FLE.pdf
10. #015869060FLE.pdf
11. #015869061FLE.pdf
12. #015869062FLE.pdf
13. #015869063FLE.pdf
14. #015869065FLE.pdf
15. #015869067FLE.pdf
16. #015869069FLE.pdf
17. #015869071FLE.pdf
18. #015869073FLE.pdf
19. #015869100FLE.pdf
20. #019234934JJK.pdf

21. #019234937JJJ.pdf
22. 001695634JJJ.pdf
23. 001695636JJJ.pdf
24. 001695637JJJ.pdf
25. 001695600JJJ.pdf
26. 001695601JJJ.pdf
27. 001695889JJJ_Signed.pdf
28. 001695891JJJ_Signed.pdf
29. 001695892JJJ_Signed.pdf
30. 001695895JJJ_Signed.pdf
31. 001695898JJJ_Signed.pdf

Record: Manifests**AOC:** Yes**Ref #:** JJ1-RR-004**Reviewed By:** Jon Jones**Reviewed Date:** 07/27/2024

On 6/7/23, the site sent an email that included a link to a SharePoint site they created, where they uploaded documents and files that we had requested during the inspection. I inspected the remaining hazardous waste manifests that the site uploaded and found that the site did not have copies of the original returned manifests that had been signed and dated by the designated facility.

There were no copies of the originals that had been signed and dated by the designated facility for the following 16 hazardous waste manifests:

#001695625JJJ
 #001695629JJJ
 #001695634JJJ
 #001695636JJJ
 #001695637JJJ
 #001695614JJJ
 #014819233FLE
 #014819234FLE
 #014819235FLE
 #014819236FLE
 #014819237FLE
 #015901726FLE
 #015901727FLE
 #015901728FLE
 #015901729FLE
 #015901730FLE

Generator copies of these hazardous waste manifests that were provided by the site have been uploaded and appear on the attached document log.

SECTION IV – AREA OF CONCERN

The presentation of Area(s) of Concern does not constitute a formal compliance determination or violation.

Building: Refinery	Area: Permitted RCRA storage site	Sub-area:
JJ1-OB-001		
A 55-gallon SAA container that held waste aerosols was not closed.	Regulation:	Sections:

A 20 cubic yard hazardous waste roll-off storage container that contained 18665 catalyst and was labeled "Pending Analysis" and dated 4/25/23 was not closed. There were two 55-gallon containers that were labeled as hazardous waste but were not marked with hazard/risk indicators. A 55-gallon hazardous waste storage container was marked with an accumulation start date (ASD) of 3/22/22. The container had been in storage at the permitted long-term storage area (TSD) for greater than a year. At the time of the inspection, the container had been in storage for 420 days. There was a container of hazardous waste hexavalent chrome that had less than 30 inches of aisle space between it and a 20 cubic yard hazardous waste roll-off container. The distance between the containers was measured with a tape measure during the inspection and that distance was determined to be only 22 and 3/4 inches. Site personnel moved the container during the inspection creating the 30 inches of separation. A photo documenting the action taken was added to the documentation provided by the site following the inspection.		
Building: Refinery	Area: Spent sandblast area	Sub-area:
JJ1-OB-002		
Failure to make a waste determination at the point of generation for a pile of spent sandblast media.	Regulation:	Sections:
Building: Refinery	Area: Used oil pad	Sub-area:
JJ1-OB-004		
There were five, 55-gallon containers of used oil that were not	Regulation:	Sections:

closed. Photo documentation was provided by the site, following the inspection, showing that the used oil containers had been closed.		
Building: Refinery	Area: Bundle cleaning pad (Main slab)	Sub-area:
JJ1-OB-005		
There was debris on the pad that looked like dried waste solids (K050) from the bundle cleaning process. There was a round pan, that looked like an oil drain pan, that contained a nasty looking unknown waste that was both black and brown in color. At the time of the inspection, site personnel did not know what the contents of the pan were and failed to make a waste determination. There was a box, on the bundle cleaning pad, containing a couple of spent waste aerosol cans. At the time of the inspection, these two waste aerosol cans were not labeled with the words "Hazardous Waste" or a hazard/risk indicator. There was a single waste aerosol can on the bundle cleaning pad that was not labeled with the words "Hazardous Waste" and was not marked with a hazard/risk indicator.	Regulation:	Sections:
Building: Refinery	Area: 900 pad	Sub-area:
JJ1-OB-006		
There was a 20 cubic yard hazardous waste roll-off dewatering box that held F037 waste, and dated 3/21/23, that was not closed. In the CAA, there was a 55-gallon container and a five-gallon bucket. The 55-gallon container was marked with the word "Empty" and was full of something, but site personnel did not know what the container held. The five-gallon bucket was approximately 3/4 full of another	Regulation:	Sections:

unknown. Site personnel failed to make a waste determination for the contents of these two containers.		
Building: Refinery	Area: Area across from the 900 Pad	Sub-area: Area between 900X1 and 900X3 Tanks
JJ1-OB-007		
There was a 20 cubic yard roll-off container of waste, marked "Pending Analysis," was not marked with an ASD and not closed. A second 20 cubic yard roll-off container, labeled as containing hazardous waste PPE with waste codes F037 and D008, was not closed.	Regulation:	Sections:
Building: Off Plot Control Room	Area:	Sub-area:
JJ1-OB-009		
A 55-gallon SAA container of waste aerosol cans was not closed.	Regulation:	Sections:
Building: Old Knock Engine Lab	Area:	Sub-area:
JJ1-OB-010		
At the time of the inspection, the gasoline-soaked waste absorbent had been on the floor of the lab for a week (Since last Tuesday, 5/9/2023), and was still on the floor and had not been cleaned up and containerized, allowing it to evaporate. According to Mr. Sumera, the gasoline-soaked waste absorbent would be managed as a hazardous waste. There were also saw two, one-gallon glass bottles that had at one time contained Pentane. At the time of the inspection, these two, one-gallon containers were not closed and were inside of an open, actively running fume hood.	Regulation:	Sections:
Building: Old Knock Engine Lab	Area: Area outside, behind the Old Engine Knock Lab	Sub-area:
JJ1-OB-011		
Outside and behind the lab there were multiple sample bottles that still contained what appeared to be	Regulation:	Sections:

gasoline, like the sample bottles previously seen in the lab fume hood which were confirmed, by site personnel, to be holding gasoline. The sample bottles looked like they had been discarded behind the lab and were presumed to have been here in disarray since the closure of the lab, which was later determined to be ten years ago.		
We also saw a discarded leather glove. I explained to Mr. Sumera that waste leather gloves fail Toxicity Characteristic Leaching Process analysis (TCLP) for Chrome (D007) and told him that a waste determination would be required for the waste glove as well as any other waste leather gloves generated at the site.		
Building: Mills lay down yard	Area:	Sub-area:
JJ1-OB-012		
A 55-gallon SAA container for waste aerosol cans, held one waste aerosol can and was not closed.	Regulation:	Sections:
Building: Brinderson Laydown yard	Area:	Sub-area:
JJ1-OB-013		
A 55-gallon SAA container of waste aerosol cans was not closed.	Regulation:	Sections:
Building: The Mills	Area:	Sub-area:
JJ1-OB-014		
There was a 55-gallon SAA container of waste oily metal shavings marked with waste code F037 was not closed.	Regulation:	Sections:
There was a small, "Ridgid" brand, ~2.5-gallon bucket, beneath a pipe threader, that also contained the same waste metal shavings and was not labeled with the words "Hazardous Waste," marked with a hazard indicator or closed. The ~2.5-gallon bucket was being used as a SAA container and, according to Mr. Reed Stanley, Supervisor with		

Mills Electric, was being emptied into the 55-gallon hazardous waste SAA container either weekly or bi-weekly. The same waste metal shavings were also piling up, beneath the pipe threader, around the bucket. There was a five-gallon container beneath the pipe threader, adjacent to the ~2.5-gallon bucket, approximately 1/8 full of the same waste metal shavings and not labeled with the words "Hazardous Waste," marked with a hazard indicator or closed. There was an additional ~2.5-gallon "Ridgid" brand bucket on the floor beneath a work bench with a half-gallon or less of the same waste metal shavings that was not labeled with the words "Hazardous Waste," marked with a hazard indicator or closed.		
Building: J.H. Kelly Laydown yard	Area:	Sub-area:
JJ1-OB-015		
A 55-gallon SAA container of waste aerosol cans was not closed. While still in the area, I inspected the contents of a flammable storage cabinet. At the time of the inspection, there were small containers of waste paint being allowed to dry out and/or evaporate inside the cabinet.	Regulation:	Sections:
Building: Western Refinery Service Warehouse	Area: Area adjacent to, and outside the WRS Warehouse	Sub-area:
JJ1-OB-016		
A 55-gallon SAA container of waste aerosol cans was not closed.	Regulation:	Sections:
Building: Waste Water Treatment Plant (WWTP)	Area: Spill Basin	Sub-area:
JJ1-OB-018		
During the inspection of the spill basin, we observed an area of	Regulation:	Sections:

vegetation inside the spill basin, near the water, with some very dark brown staining as well as an oily discharge we observed flowing from a black pipe into the spill basin. If this discharge is from either of the process sewers, then process wastewaters are entering the spill basin during a period that would not be from wet weather flow. This would result in the spill basin receiving wastewaters that generate F037 primary separation sludge.		
Building: Lab	Area: Optical Emission Spectrometer	Sub-area:
JJ1-OB-021		
At the time of the inspection, the two-gallon waste xylene container was not labeled with the words "Hazardous Waste."	Regulation:	Sections:
Building: Lab	Area: Fume Hood FH-06/EAV-06	Sub-area:
JJ1-OB-022		
There were also some sample wastes and acid wastes in containers that were not labeled and were in close proximity to a cyanide analyzer. The wastes were not labeled with the words "Hazardous Waste", and some required a waste determination. There was a chromatograph waste container that was on the floor that was not labeled with the words "Hazardous Waste."	Regulation:	Sections:
Building: Lab	Area: Fume Hood FH-15/EAV-15	Sub-area:
JJ1-OB-023		
There was a cup of spent/used Draeger tubes inside a fume hood that were not labeled with the words "Hazardous Waste", marked with a hazard/risk indicator, and not closed.	Regulation:	Sections:
Building: Lab	Area: North Connex	Sub-area:
JJ1-OB-024		
The following expired chemicals were identified:	Regulation:	Sections:

- Expired Sodium Hydroxide 11/2021 - Expired Activator 1/2021 During the inspection, it was mentioned that expired chemicals were disposed of in lab sinks that drain to the oily sewer.		
Building: Lab	Area: South Connex	Sub-area:
JJ1-OB-025		
There were two, four-foot boxes that contained ~60+ waste lamps that were not labeled with either the words, "Universal Waste - Lamps," "Waste - Lamps," or "Used Lamps" and the boxes were also not closed. There were also ~10 CFLs that were not packaged and not labeled with either the words, "Universal Waste - Lamps," "Waste - Lamps," or "Used Lamps." According to both Mr. Sumera and Mr. Nelson, the waste lamps had also been in accumulation for greater than two years.	Regulation:	Sections:
Building: Spent fluorescent lamp storage	Area:	Sub-area:
JJ1-OB-026		
The following universal wastes were observed: - One box containing waste High-Pressure Sodium bulbs. - One box containing eight-foot waste fluorescent lamps. - One box containing four-foot waste fluorescent lamps. All three universal waste lamp container were not closed. There was a sealed lead-acid battery that was wrapped with red tape and the word "BAD" was written on the tape. Site personnel stated the batteries	Regulation:	Sections:

were managed as universal waste. The waste battery was not labeled with either the words "Universal Waste - Battery(ies)," "Waste - Battery(ies)," or "Used Battery(ies)."		
Building: Spent carbon storage area	Area:	Sub-area:
JJ1-OB-027		
Spent carbon was being accumulated in cubic yard supersacks and then shipped off-site to a facility to be deactivated/reclaimed. There were ~44 cubic yard supersacks of spent carbon behind a roped off area delineated as "Spent Carbon for Reclamation." There were two to three additional supersacks outside the roped off area that had been marked "SPENT" with fluorescent green spray paint.	Regulation:	Sections:

Record: Any permit specific requirements**JJ1-RR-001**

There were 41 weekly hazardous waste inspections conducted at the permitted site that exceeded six days between inspections and six weeks where no weekly inspection was conducted.

Regulation:**Sections:****Record:** Inspections**JJ1-RR-002**

Weekly inspections for the site's CAA were not conducted for the following seven (7) weeks:

August 16-22, 2020

August 23-29, 2020

December 27, 2020, through

January 2, 2021

May 29 through June 4, 2022

September 4-10, 2022

January 1-7, 2023

February 5-11, 2023

Regulation:**Sections:****Record:** LDR Notices/Documents**JJ1-RR-003**

During this inspection we saw that when the site shipped F037/F038 waste offsite, the facility did not include the waste code for benzene (D018) on the following manifests and their accompanying LDRs. Waste code D018 (Benzene) needs to be included on the LDR notification, since characteristic wastes need to include the underlying hazardous constituents (UHCs).	Regulation:	Sections:
Record: Manifests		
JJ1-RR-004		
There were no copies of the original returned manifests that had been signed and dated by the designated facility for 16 hazardous waste manifests	Regulation:	Sections:

SECTION V – CLOSING CONFERENCE AND FOLLOW UP**Closing Conference**

At the conclusion of the inspection, we conducted a closing conference that was attended by those listed in the Attendees table, in Section I of this report. We 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 we observed during the inspection of the site. 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 documented violations.

Photo(s)

1. [IMG_1230.jpg](#)

Follow Up

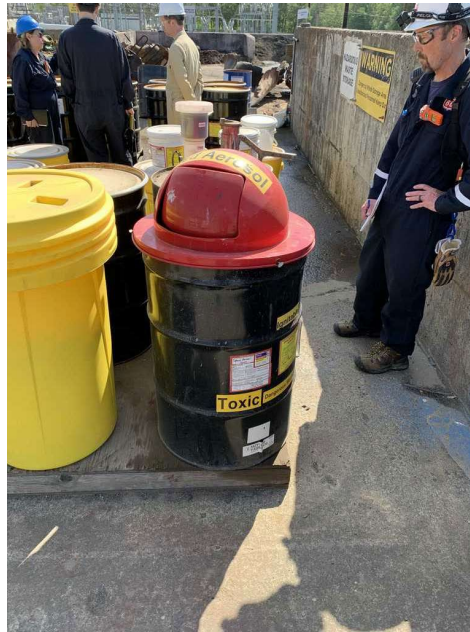
On 6/7/23, the site sent an email that included a link to a SharePoint site they created, where they uploaded documents and files that we had requested during the inspection. The site also uploaded an inspection response to some of the areas of concern that were identified during the inspection, as well as some photos documenting some corrective action.

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

1. Photo Log

2. Document Log

APPENDIX 1: PHOTO LOG



[Title]			IMG_1004.jpg
05/16/2023 10:20 AM	No CBI	No PII	Photographer: Jon Jones
Refinery/Permitted RCRA storage area			48.82745833, -122.69075
View of waste aerosol storage container that is not closed.			



[Title]			IMG_1005.jpg
05/16/2023 10:20 AM	No CBI	No PII	Photographer: Jon Jones
Refinery/Permitted RCRA storage area			48.82746388, -122.69075
View of the labeling on the waste aerosol storage container.			



[Title]			IMG_1006.jpg
05/16/2023 10:21 AM	No CBI	No PII	Photographer: Jon Jones
Refinery/Permitted RCRA storage area			48.82746388, -122.69071111
View of the labeling on the waste aerosol storage container.			



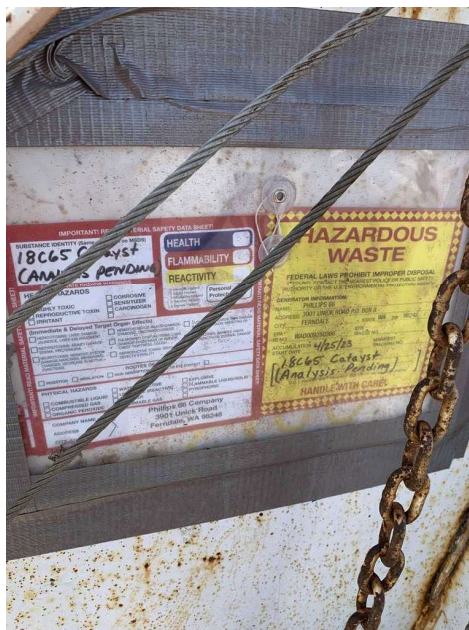
[Title]			IMG_1007.jpg
05/16/2023 10:21 AM	No CBI	No PII	Photographer: Jon Jones
Refinery/Permitted RCRA storage area			48.82748055, -122.69071944
Close-up view of the waste aerosol storage container, showing that the swinging lid doesn't completely seal when closed.			



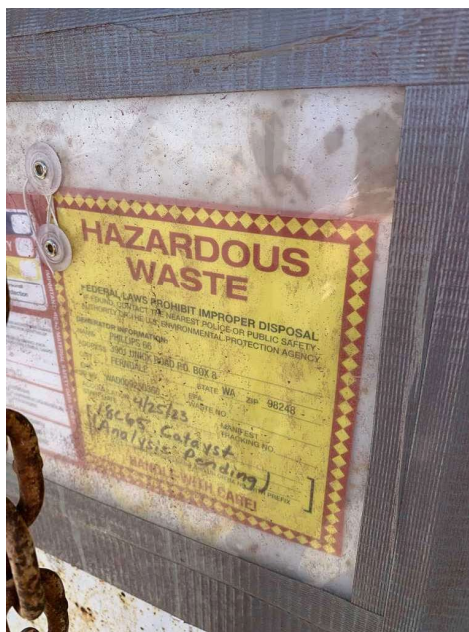
[Title]			DSCN0672.JPG
05/16/2023 10:32 AM	No CBI	No PII	Photographer: Jackie Vega
Refinery/Permitted RCRA storage area			[Geographic Coordinates]
View of roll-off pending analysis of 18665 catalyst in permitted storage area, showing gap in cover.			



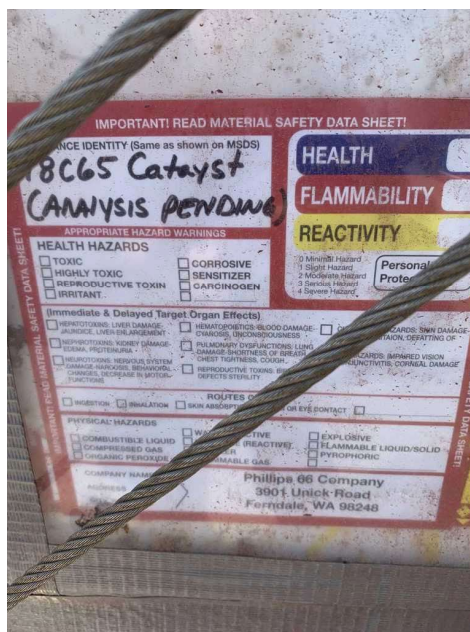
[Title]			IMG_1011.jpg
05/16/2023 10:33 AM	No CBI	No PII	Photographer: Jon Jones
Refinery/Permitted RCRA storage area			48.82756388, -122.690675
View of 20 cubic yard roll-off that is not closed.			



[Title]			IMG_1012.jpg
05/16/2023 10:33 AM	No CBI	No PII	Photographer: Jon Jones
Refinery/Permitted RCRA storage area			48.82755555, -122.69068055
Close-up view of the labeling on the 20 cubic yard roll-off that was not closed.			



[Title]			IMG_1013.jpg
05/16/2023 10:33 AM	No CBI	No PII	Photographer: Jon Jones
Refinery/Permitted RCRA storage area			48.82756388, -122.69068055
Another close-up view of the labeling on the 20 cubic yard roll-off.			



[Title]			IMG_1014.jpg
05/16/2023 10:34 AM	No CBI	No PII	Photographer: Jon Jones
Refinery/Permitted RCRA storage area			48.82754444, -122.69068055
Another close-up view of the labeling on the 20 cubic yard roll-off.			



[Title]			IMG_1015.jpg
05/16/2023 10:34 AM	No CBI	No PII	Photographer: Jon Jones
Refinery/Permitted RCRA storage area			48.82755277, -122.69068888
Another close-up view of the gap between the lid and the top of the 20 cubic yard roll-off, showing that the roll-off container is not closed.			



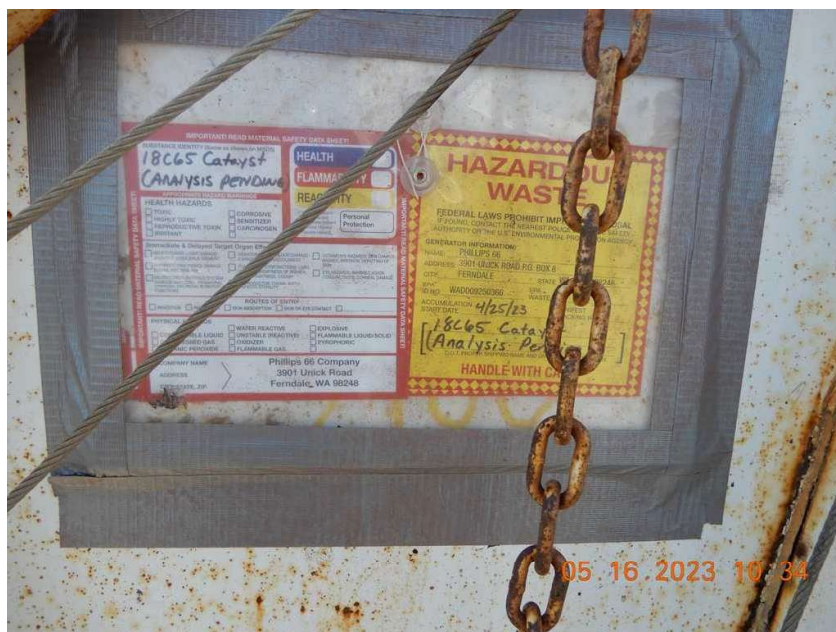
[Title]			IMG_1016.jpg
05/16/2023 10:34 AM	No CBI	No PII	Photographer: Jon Jones
Refinery/Permitted RCRA storage area			48.82754166, -122.69068888
Another close-up view of the gap between the lid and the top of the 20 cubic yard roll-off, showing that the roll-off container is not closed.			



[Title]			IMG_1017.jpg
05/16/2023 10:34 AM	No CBI	No PII	Photographer: Jon Jones
Refinery/Permitted RCRA storage area			48.82753333, -122.69071944
Another close-up view of the gap between the lid and the top of the 20 cubic yard roll-off, showing that the roll-off container is not closed.			



[Title]			IMG_1018.jpg
05/16/2023 10:34 AM	No CBI	No PII	Photographer: Jon Jones
Refinery/Permitted RCRA storage area			48.82751111, -122.69072777
Close-up view of the gap between the lid and the top of the 20 cubic yard roll-off, showing that the roll-off container is not closed.			



[Title]			DSCN0673.JPG
05/16/2023 10:34 AM	No CBI	No PII	Photographer: Jackie Vega
Refinery/Permitted RCRA storage area			[Geographic Coordinates]
View of hazardous waste label on roll-off pending analysis of 18665 catalyst in permitted storage area.			



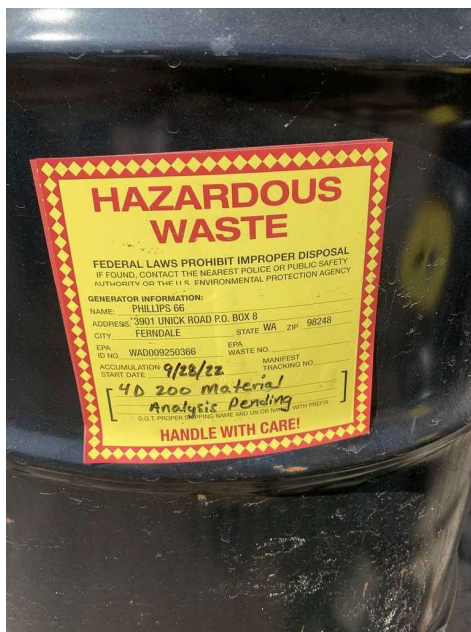
[Title]			IMG_1019.jpg
05/16/2023 10:35 AM	No CBI	No PII	Photographer: Jon Jones
Refinery/Permitted RCRA storage area			48.82749444, -122.69071944
Another close-up view of the gap between the lid and the top of the 20 cubic yard roll-off, showing that the roll-off container is not closed.			



[Title]			IMG_1020.jpg
05/16/2023 10:39 AM	No CBI	No PII	Photographer: Jon Jones
Refinery/Permitted RCRA storage area			48.82746944, -122.69079722
View of 55-gallon waste storage container that is not marked with a hazard/risk indicator.			



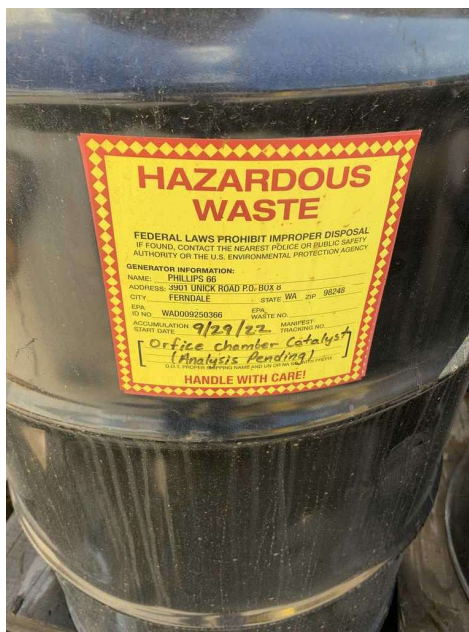
[Title]			IMG_1021.jpg
05/16/2023 10:39 AM	No CBI	No PII	Photographer: Jon Jones
Refinery/Permitted RCRA storage area			48.82747777, -122.69065833
View of 55-gallon waste storage container that is not marked with a hazard/risk indicator.			



[Title]			IMG_1022.jpg
05/16/2023 10:39 AM	No CBI	No PII	Photographer: Jon Jones
Refinery/Permitted RCRA storage area			48.82748333, -122.69065
Close-up view of the label on the 55-gallon waste storage container that is not marked with a hazard/risk indicator.			



[Title]			IMG_1023.jpg
05/16/2023 10:39 AM	No CBI	No PII	Photographer: Jon Jones
Refinery/Permitted RCRA storage area			48.82748333, -122.69068888
View of 55-gallon waste storage container that is not marked with a hazard/risk indicator.			



[Title]			IMG_1024.jpg
05/16/2023 10:39 AM	No CBI	No PII	Photographer: Jon Jones
Refinery/Permitted RCRA storage area			48.82748888, -122.69066666
Close-up view of the label on the 55-gallon waste storage container that is not marked with a hazard/risk indicator.			



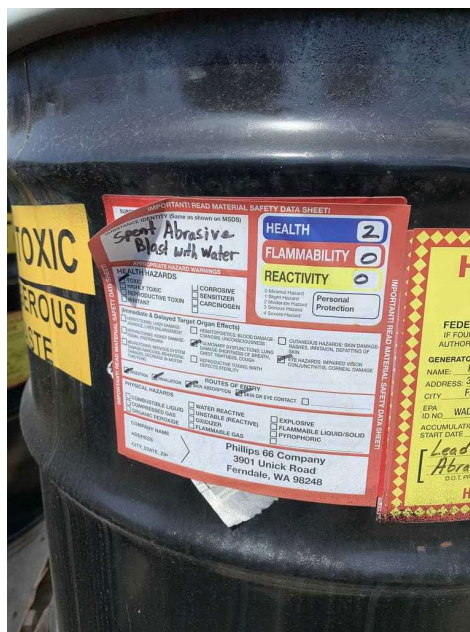
[Title]			DSCN0674.JPG
05/16/2023 10:41 AM	No CBI	No PII	Photographer: Jackie Vega
Refinery/Permitted RCRA storage area			[Geographic Coordinates]
View of hazardous waste label on 55-gallon container in permitted storage area of D008 waste with date of 3/22/22.			



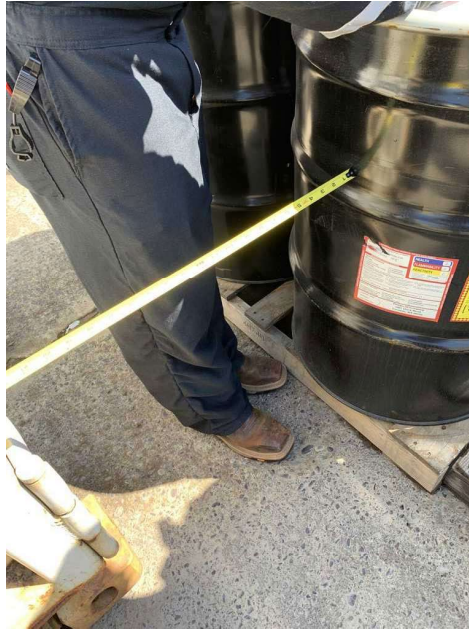
[Title]			IMG_1025.jpg
05/16/2023 10:43 AM	No CBI	No PII	Photographer: Jon Jones
Refinery/Permitted RCRA storage area			48.82753888, -122.69068055
View of a hazardous waste container that has been in storage at the facility's permitted storage area for greater than one year.			



[Title]			IMG_1026.jpg
05/16/2023 10:43 AM	No CBI	No PII	Photographer: Jon Jones
Refinery/Permitted RCRA storage area			48.82750833, -122.690675
View of the label on the container showing the ASD of 3/22/22.			



[Title]			IMG_1027.jpg
05/16/2023 10:43 AM	No CBI	No PII	Photographer: Jon Jones
Refinery/Permitted RCRA storage area			48.82751111, -122.690675
Another close-up view of the container labeling on the waste that had been stored for greater than a year.			



[Title]			IMG_1036.jpg
05/16/2023 10:58 AM	No CBI	No PII	Photographer: Jon Jones
Refinery/Permitted RCRA storage area			48.82761111, -122.69081111
View of 55-gallon container of Hex Chrome waste that doesn't have 30 inches of aisle space between it and a 20 cubic yard roll-off container of waste.			



[Title]			IMG_1037.jpg
05/16/2023 10:58 AM	No CBI	No PII	Photographer: Jon Jones
Refinery/Permitted RCRA storage area			48.82746388, -122.69070555
View of the tape measure, showing there was only 22 and 3/4 inches of aisle space between the 55-gallon hazardous waste container and the 20 cubic yard hazardous waste roll-off.			



[Title]			IMG_1038.jpg
05/16/2023 11:02 AM	No CBI	No PII	Photographer: Jon Jones
Refinery/Spent sandblast area			48.82704444, -122.69116111
View of the spent sandblast media area.			



[Title]			IMG_1039.jpg
05/16/2023 11:02 AM	No CBI	No PII	Photographer: Jon Jones
Refinery/Spent sandblast area			48.82701111, -122.69107777
Close-up view of the piles of spent sandblast media.			



[Title]			DSCN0675.JPG
05/16/2023 11:08 AM	No CBI	No PII	Photographer: Jackie Vega
Refinery/Spent sandblast area			[Geographic Coordinates]
View of spent sandblast sand accumulated on pad next to permitted storage area.			



[Title]			DSCN0676.JPG
05/16/2023 11:08 AM	No CBI	No PII	Photographer: Jackie Vega
Refinery/Spent sandblast area			[Geographic Coordinates]
View of supersack holding spent sandblast sand next to the pad.			



[Title]			DSCN0677.JPG
05/16/2023 11:24 AM	No CBI	No PII	Photographer: Jackie Vega
Refinery/Catalyst bunkers			[Geographic Coordinates]
View of PTU catalyst bunker with spent catalyst being accumulated.			



[Title]			DSCN0678.JPG
05/16/2023 11:24 AM	No CBI	No PII	Photographer: Jackie Vega
Refinery/Catalyst bunkers			[Geographic Coordinates]
View of support bed/misc. catalyst bunker with spent catalyst being accumulated.			



[Title]			IMG_1040.jpg
05/16/2023 11:26 AM	No CBI	No PII	Photographer: Jon Jones
Refinery/Catalyst bunkers			48.82747777, -122.69046666
Another view of the PTU catalyst bunker with accumulated spent catalyst.			



[Title]			IMG_1041.jpg
05/16/2023 11:26 AM	No CBI	No PII	Photographer: Jon Jones
Refinery/Catalyst bunkers			48.82744166, -122.69040555
Another view of the catalyst bunker.			



[Title]			IMG_1042.jpg
05/16/2023 11:32 AM	No CBI	No PII	Photographer: Jon Jones
Refinery/Used oil pad			48.82764166, -122.69032222
View of 55-gallon used oil containers that are not closed.			



[Title]			IMG_1043.jpg
05/16/2023 11:32 AM	No CBI	No PII	Photographer: Jon Jones
Refinery/Used oil pad			48.82763611, -122.69030833
Close-up view of a 55-gallon used oil container that is not closed.			



[Title]			IMG_1044.jpg
05/16/2023 11:32 AM	No CBI	No PII	Photographer: Jon Jones
Refinery/Used oil pad			48.82761111, -122.69029166
Another close-up view of a 55-gallon used oil container that is not closed.			



[Title]			IMG_1045.jpg
05/16/2023 11:32 AM	No CBI	No PII	Photographer: Jon Jones
Refinery/Used oil pad			48.82760277, -122.69033055
Another close-up view of a 55-gallon used oil container that is not closed.			



[Title]			IMG_1046.jpg
05/16/2023 11:34 AM	No CBI	No PII	Photographer: Jon Jones
Refinery/Used oil pad			48.82759166, -122.6903
Another view of 55-gallon used oil containers that are not closed.			



[Title]			IMG_1047.jpg
05/16/2023 11:42 AM	No CBI	No PII	Photographer: Jon Jones
Refinery/Used oil pad			48.82769444, -122.69033888
Another view of the 55-gallon used oil container at the used oil pad.			



[Title]			DSCN0679.JPG
05/16/2023 02:15 PM	No CBI	No PII	Photographer: Jackie Vega
Refinery/Bundle cleaning pad (Main slab)			[Geographic Coordinates]
View of waste aerosol can collection drum at the main bundle cleaning pad; drum not closed but was empty.			



[Title]			DSCN0680.JPG
05/16/2023 02:16 PM	No CBI	No PII	Photographer: Jackie Vega
Refinery/Bundle cleaning pad (Main slab)			[Geographic Coordinates]
View of the label on waste aerosol can collection drum at the main bundle cleaning pad.			



[Title]			DSCN0681.JPG
05/16/2023 02:25 PM	No CBI	No PII	Photographer: Jackie Vega
Refinery/Bundle cleaning pad (Main slab)			[Geographic Coordinates]
View of solid residues on the bundle cleaning pad.			



[Title]			DSCN0682.JPG
05/16/2023 02:25 PM	No CBI	No PII	Photographer: Jackie Vega
Refinery/Bundle cleaning pad (Main slab)			[Geographic Coordinates]
Another view of solid residues on the bundle cleaning pad.			



[Title]			DSCN0683.JPG
05/16/2023 02:29 PM	No CBI	No PII	Photographer: Jackie Vega
Refinery/Bundle cleaning pad (Main slab)			[Geographic Coordinates]
Another view of solid residues on the bundle cleaning pad.			



[Title]			DSCN0684.JPG
05/16/2023 02:31 PM	No CBI	No PII	Photographer: Jackie Vega
Refinery/Bundle cleaning pad (Main slab)			[Geographic Coordinates]
View of end of bundle and heat exchanger bundle on the bundle cleaning pad.			



[Title]			DSCN0685.JPG
05/16/2023 02:31 PM	No CBI	No PII	Photographer: Jackie Vega
Refinery/Bundle cleaning pad (Main slab)			[Geographic Coordinates]
View of end of bundle still containing residues and solid residues on the ground on the bundle cleaning pad.			



[Title]			DSCN0686.JPG
05/16/2023 02:37 PM	No CBI	No PII	Photographer: Jackie Vega
Refinery/Bundle cleaning pad (Main slab)			[Geographic Coordinates]
Another view of solid residues on the bundle cleaning pad.			



[Title]			DSCN0687.JPG
05/16/2023 02:40 PM	No CBI	No PII	Photographer: Jackie Vega
Refinery/Bundle cleaning pad (Main slab)			[Geographic Coordinates]
View of pan containing oily debris on the bundle cleaning pad.			



[Title]			DSCN0688.JPG
05/16/2023 02:44 PM	No CBI	No PII	Photographer: Jackie Vega
Refinery/Bundle cleaning pad (Main slab)			[Geographic Coordinates]
View of a box containing used aerosol cans on the bundle cleaning pad.			



[Title]			DSCN0689.JPG
05/16/2023 03:00 PM	No CBI	No PII	Photographer: Jackie Vega
Refinery/900 pad			[Geographic Coordinates]
View of hoses from dewatering box going into the drain at the 900 pad.			



[Title]			DSCN0690.JPG
05/16/2023 03:01 PM	No CBI	No PII	Photographer: Jackie Vega
Refinery/900 pad			[Geographic Coordinates]
Close-up view of the label on the dewatering box on 900 pad.			



[Title]			DSCN0691.JPG
05/16/2023 03:01 PM	No CBI	No PII	Photographer: Jackie Vega
Refinery/900 pad			[Geographic Coordinates]
Another view of the dewatering box on 900 pad with open tarp on top.			



[Title]			DSCN0692.JPG
05/16/2023 03:04 PM	No CBI	No PII	Photographer: Jackie Vega
Refinery/900 pad			[Geographic Coordinates]
View of a full unmarked drum with a white lid, containing an unknown, next to the 900 pad.			



[Title]			DSCN0693.JPG
05/16/2023 03:04 PM	No CBI	No PII	Photographer: Jackie Vega
Refinery/900 pad			[Geographic Coordinates]
View of five-gallon bucket containing an unknown waste, next to 900 pad.			



[Title]			DSCN0694.JPG
05/16/2023 03:04 PM	No CBI	No PII	Photographer: Jackie Vega
Refinery/900 pad			[Geographic Coordinates]
View of unknown waste inside the five-gallon bucket, next to the 900 pad.			



[Title]			DSCN0695.JPG
05/16/2023 03:10 PM	No CBI	No PII	Photographer: Jackie Vega
Refinery/900 pad			[Geographic Coordinates]
View of spent Amine frac tank on the 900 pad.			



[Title]			DSCN0696.JPG
05/16/2023 03:11 PM	No CBI	No PII	Photographer: Jackie Vega
Refinery/900 pad			[Geographic Coordinates]
Close-up view of the label on the spent amine frac tank on the 900 pad.			



[Title]			DSCN0697.JPG
05/16/2023 03:11 PM	No CBI	No PII	Photographer: Jackie Vega
Refinery/900 pad			[Geographic Coordinates]
View of the hose leading from the spent amine frac tank and draining to the oily water sewer.			



[Title]			DSCN0698.JPG
05/16/2023 03:19 PM	No CBI	No PII	Photographer: Jackie Vega
Refinery/Area across from the 900 Pad			[Geographic Coordinates]
View of carbon cannisters by wastewater treatment tanks 900X3 and 900X1 collecting vapors from sewer.			



[Title]			DSCN0699.JPG
05/16/2023 03:25 PM	No CBI	No PII	Photographer: Jackie Vega
Refinery/Area across from the 900 Pad			[Geographic Coordinates]
View of roll-off containing contaminated PPE and debris at 900 Pad area.			



[Title]			DSCN0700.JPG
05/16/2023 03:26 PM	No CBI	No PII	Photographer: Jackie Vega
Refinery/Area across from the 900 Pad			[Geographic Coordinates]
View of the label on the roll-off of contaminated PPE and debris at the 900 Pad area.			



[Title]			DSCN0701.JPG
05/16/2023 03:27 PM	No CBI	No PII	Photographer: Jackie Vega
Refinery/Area across from the 900 Pad			[Geographic Coordinates]
View of the open area between the container and lid on the roll-off of contaminated PPE and debris at the 900 Pad area.			



[Title]			DSCN0702.JPG
05/16/2023 03:30 PM	No CBI	No PII	Photographer: Jackie Vega
Refinery/Area across from the 900 Pad			[Geographic Coordinates]
View of the hazardous waste label, on the roll-off of 7C-111 catalyst (pending analysis) at the 900 Pad area, showing no ASD.			



[Title]			DSCN0703.JPG
05/16/2023 03:30 PM	No CBI	No PII	Photographer: Jackie Vega
Refinery/Area across from the 900 Pad			[Geographic Coordinates]
View of open space between container and lid on roll-off of catalyst that was pending analysis at the 900 Pad area with no ASD.			



[Title]			DSCN0704.JPG
05/16/2023 03:32 PM	No CBI	No PII	Photographer: Jackie Vega
Refinery/Area across from the 900 Pad			[Geographic Coordinates]
Another view of open space between container and lid on roll-off of catalyst that was pending analysis at the 900 Pad area with no ASD.			



[Title]			IMG_1049.jpg
05/17/2023 10:27 AM	No CBI	No PII	Photographer: Jon Jones
Off Plot Control Room			48.83201944, -122.69986666
View of the 55-gallon SAA container of waste aerosol cans, showing the lid with swinging door that does not make a complete seal.			



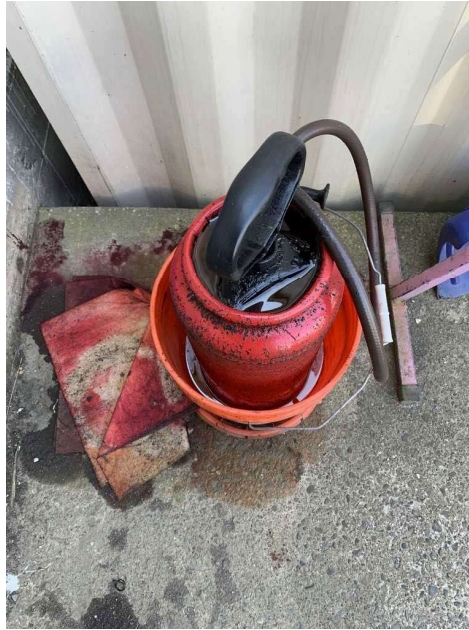
[Title]			IMG_1050.jpg
05/17/2023 10:28 AM	No CBI	No PII	Photographer: Jon Jones
Off Plot Control Room			48.83198055, -122.69990555
Close-up view of the labeling on the 55-gallon SAA container of waste aerosol cans, with the lid with swinging door that does not make a complete seal.			



[Title]			IMG_1051.jpg
05/17/2023 10:28 AM	No CBI	No PII	Photographer: Jon Jones
Off Plot Control Room			48.831975, -122.69990555
Close-up view , showing the lid with swinging door that does not make a complete seal.			



[Title]			IMG_1052.jpg
05/17/2023 10:31 AM	No CBI	No PII	Photographer: Jon Jones
Off Plot Control Room			48.83205, -122.69982222
View of the container of de-icing product.			



[Title]			IMG_1053.jpg
05/17/2023 10:31 AM	No CBI	No PII	Photographer: Jon Jones
Off Plot Control Room			48.83200833, -122.69995
Close-up view of the leaking container of deicer.			



[Title]			IMG_1054.jpg
05/17/2023 10:32 AM	No CBI	No PII	Photographer: Jon Jones
Off Plot Control Room			48.83205, -122.70003611
View of the leaking container of deicer.			



[Title]			IMG_1055.jpg
05/17/2023 10:34 AM	No CBI	No PII	Photographer: Jon Jones
Old Knock Engine Lab			48.83188888, -122.69921111
View of the Old Engine Knock Lab, with absorbent seen on the floor for gasoline spill.			



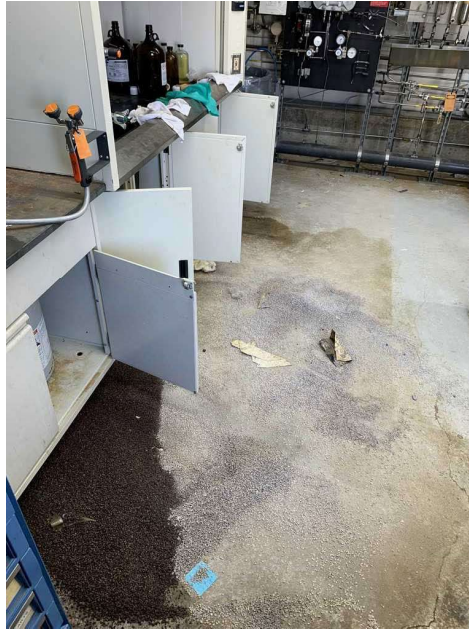
[Title]			IMG_1056.jpg
05/17/2023 10:34 AM	No CBI	No PII	Photographer: Jon Jones
Old Knock Engine Lab			48.83212777, -122.69959166
Another view of the lab, showing the gasoline spill absorbent on the floor.			



[Title]			IMG_1057.jpg
05/17/2023 10:34 AM	No CBI	No PII	Photographer: Jon Jones
Old Knock Engine Lab			48.83212222, -122.69969166
Another view inside the lab, showing the gasoline spill and absorbent on the floor.			



[Title]			IMG_1058.jpg
05/17/2023 10:38 AM	No CBI	No PII	Photographer: Jon Jones
Old Knock Engine Lab			48.83188611, -122.69917222
Close-up view of absorbent material on the floor of the lab, saturated from a gasoline spill.			



[Title]			IMG_1059.jpg
05/17/2023 10:44 AM	No CBI	No PII	Photographer: Jon Jones
Old Knock Engine Lab			48.83204166, -122.69981388
Another view of the absorbent material on the floor of the lab, saturated with spilled gasoline.			



[Title]			IMG_1060.jpg
05/17/2023 10:44 AM	No CBI	No PII	Photographer: Jon Jones
Old Knock Engine Lab			48.83206666, -122.699775
View of the Flow Meter with site glass that was installed after the previous one broke, causing the gasoline spill in the decommissioned lab.			



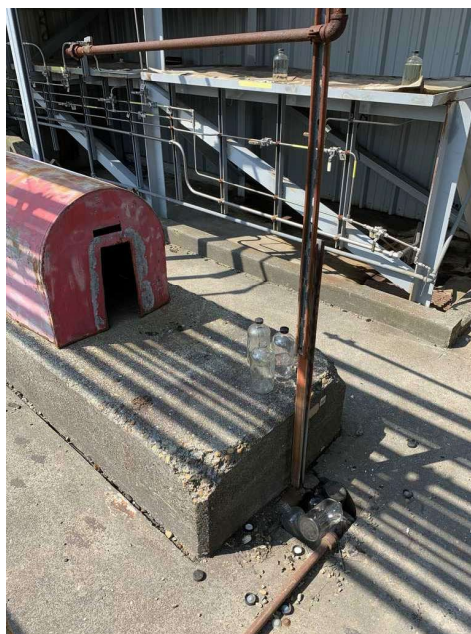
[Title]			IMG_1061.jpg
05/17/2023 10:52 AM	No CBI	No PII	Photographer: Jon Jones
Old Knock Engine Lab			48.83202777, -122.69931111
View of sample bottles, containing gasoline, and two, one-gallon containers that last contained Pentane, inside an actively running fume hood in the decommissioned lab.			



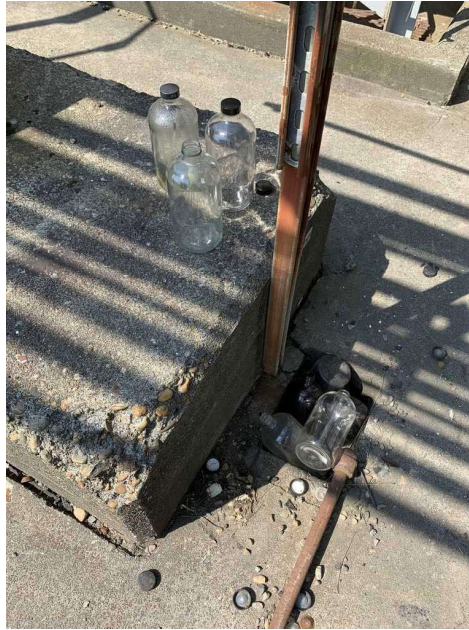
[Title]			IMG_1062.jpg
05/17/2023 10:52 AM	No CBI	No PII	Photographer: Jon Jones
Old Knock Engine Lab			48.83211944, -122.69989722
Close-up view of the sample bottles inside the fume hood of the decommissioned lab.			



[Title]			IMG_1063.jpg
05/17/2023 10:53 AM	No CBI	No PII	Photographer: Jon Jones
Old Knock Engine Lab/Area outside, behind the Old Engine Knock Lab			48.83185555, -122.69960833
View of the area, outside and behind the decommissioned Engine Knock Lab, showing sample bottles containing gasoline that are presumed to be left when the lab was shut down ten years earlier.			



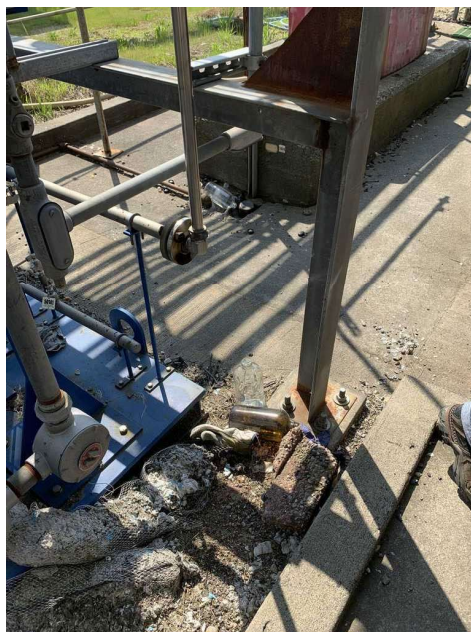
[Title]			IMG_1064.jpg
05/17/2023 10:53 AM	No CBI	No PII	Photographer: Jon Jones
Old Knock Engine Lab/Area outside, behind the Old Engine Knock Lab			48.83191944, -122.69963888
Another view of the area behind the decommissioned lab, showing the discarded gasoline samples left behind following the lab shutdown.			



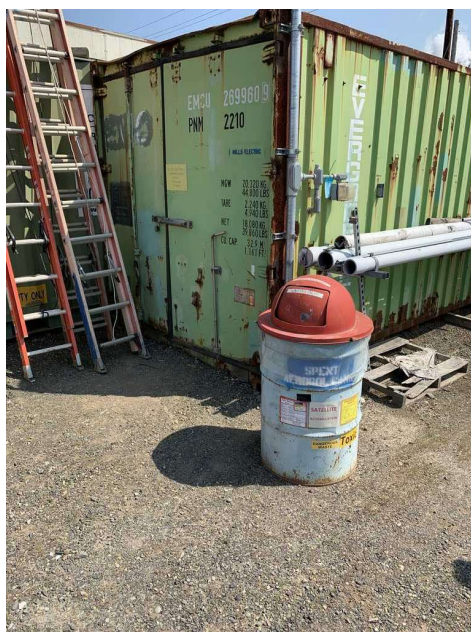
[Title]			IMG_1065.jpg
05/17/2023 10:53 AM	No CBI	No PII	Photographer: Jon Jones
Old Knock Engine Lab/Area outside, behind the Old Engine Knock Lab			48.831925, -122.69965277
Close-up view of the discarded sample bottles found behind the decommissioned lab.			



[Title]			IMG_1066.jpg
05/17/2023 10:53 AM	No CBI	No PII	Photographer: Jon Jones
Old Knock Engine Lab/Area outside, behind the Old Engine Knock Lab			48.83196388, -122.6997
Another close-up view of the discarded sample bottles found behind the decommissioned lab, along with a waste leather glove.			



[Title]			IMG_1067.jpg
05/17/2023 10:54 AM	No CBI	No PII	Photographer: Jon Jones
Old Knock Engine Lab/Area outside, behind the Old Engine Knock Lab			48.83195833, -122.69973888
Another view of the discarded sample bottles and waste leather glove found behind the decommissioned lab.			



[Title]			IMG_1068.jpg
05/17/2023 11:15 AM	No CBI	No PII	Photographer: Jon Jones
Mills lay down yard			48.82812222, -122.69719722
View of 55-gallon waste aerosol SAA that is not closed. SAA container is seen here with a swinging door type lid that doesn't contact the container when in the closed position.			



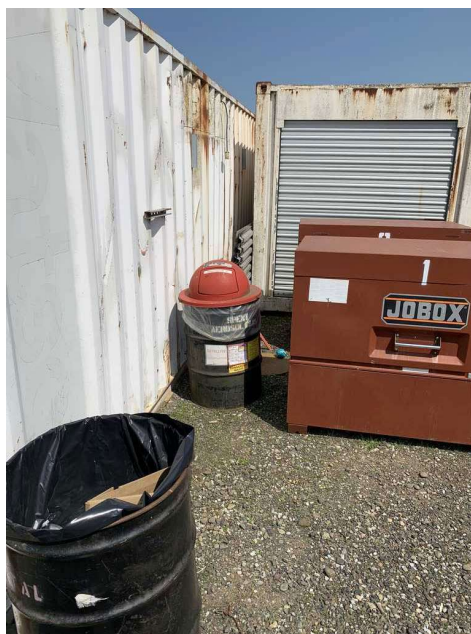
[Title]			IMG_1069.jpg
05/17/2023 11:16 AM	No CBI	No PII	Photographer: Jon Jones
Mills lay down yard			48.82801944, -122.69712777
Close-up view of the labeling on the 55-gallon waste aerosol SAA seen in photo IMG_1068.jpg.			



[Title]			IMG_1070.jpg
05/17/2023 11:16 AM	No CBI	No PII	Photographer: Jon Jones
Mills lay down yard			48.82799444, -122.69718055
Another close-up view of the labeling on the 55-gallon waste aerosol SAA seen in photo IMG_1068.jpg.			



[Title]			IMG_1071.jpg
05/17/2023 11:16 AM	No CBI	No PII	Photographer: Jon Jones
Mills lay down yard			48.82801111, -122.697175
Close-up view of the swinging door type lid on the 55-gallon waste aerosol SAA, seen in photo IMG_1068.jpg, showing how the swinging door not only won't close, but doesn't make a complete seal even if it was able to close.			



[Title]			IMG_1072.jpg
05/17/2023 11:21 AM	No CBI	No PII	Photographer: Jon Jones
Brinderson Laydown yard			48.82873888, -122.69785277
View of another 55-gallon waste aerosol can SAA that is not closed, due to the design of the swinging door type lid.			



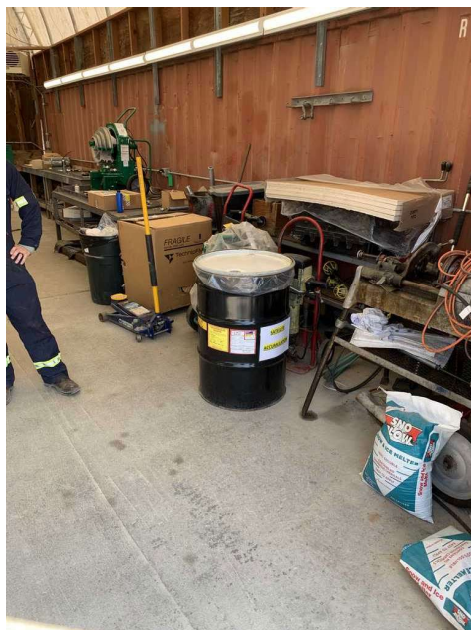
[Title]			IMG_1073.jpg
05/17/2023 11:21 AM	No CBI	No PII	Photographer: Jon Jones
Brinderson Laydown yard			48.82878888, -122.69773888
Close-up view of the labeling on the same waste aerosol can SAA seen in photo IMG_1072.jpg.			



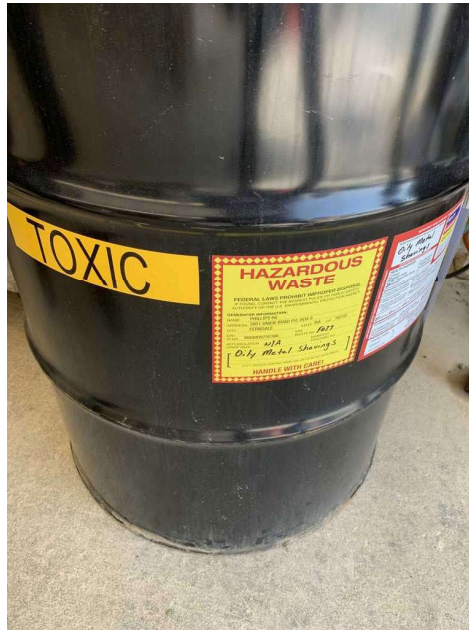
[Title]			IMG_1074.jpg
05/17/2023 11:21 AM	No CBI	No PII	Photographer: Jon Jones
Brinderson Laydown yard			48.82878055, -122.69773055
Another close-up view of the labeling on the same waste aerosol can SAA seen in photo IMG_1072.jpg.			



[Title]			IMG_1075.jpg
05/17/2023 11:21 AM	No CBI	No PII	Photographer: Jon Jones
Brinderson Laydown yard			48.82879166, -122.69773888
Close-up view of the swinging door type lid on the 55-gallon waste aerosol SAA, seen in photo IMG_1072.jpg, showing how the swinging door doesn't make a complete seal even when in the closed position.			



[Title]			IMG_1076.jpg
05/17/2023 11:24 AM	No CBI	No PII	Photographer: Jon Jones
The Mills			48.82830833, -122.69859444
View of a 55-gallon hazardous waste SAA container of Waste oily metal shavings (F037).			



[Title]			IMG_1077.jpg
05/17/2023 11:24 AM	No CBI	No PII	Photographer: Jon Jones
The Mills			48.82831666, -122.6986
Close-up view of the labeling on the 55-gallon waste oily metal shavings SAA container (F037).			



[Title]			IMG_1078.jpg
05/17/2023 11:24 AM	No CBI	No PII	Photographer: Jon Jones
The Mills			48.8283, -122.69860833
View of another 55-gallon waste aerosol can SAA that is not closed, due to the design of the swinging door type lid.			



[Title]			IMG_1079.jpg
05/17/2023 11:24 AM	No CBI	No PII	Photographer: Jon Jones
The Mills			48.82830555, -122.69861666
Close-up view of the lid on the 55-gallon waste oily metal shavings SAA container (F037), showing that the container is not closed. Shown here, the drum ring is attached to the lid and both drum ring and lid are just resting on top of the container and not making a complete seal with the container.			



[Title]			IMG_1080.jpg
05/17/2023 11:24 AM	No CBI	No PII	Photographer: Jon Jones
The Mills			48.82830833, -122.69859444
View of the same container, seen in photo IMG_1079, showing the gap between the lid and container.			



[Title]			IMG_1081.jpg
05/17/2023 11:24 AM	No CBI	No PII	Photographer: Jon Jones
The Mills			48.8283, -122.6986
View of the 55-gallon waste oily metal shavings SAA container contents.			



[Title]			IMG_1082.jpg
05/17/2023 11:29 AM	No CBI	No PII	Photographer: Jon Jones
The Mills			48.82836944, -122.69859444
View of a ~2.5-gallon container, seen here beneath a pipe cutter/threader, that contains the same waste oily metal shavings (F037) and is not closed or labeled.			



[Title]			IMG_1083.jpg
05/17/2023 11:30 AM	No CBI	No PII	Photographer: Jon Jones
The Mills			48.82835277, -122.69855555
Close-up view of the ~2.5-gallon container, seen in photo IMG_1082.jpg, that contains the same waste oily metal shavings (F037) and is not closed or labeled.			



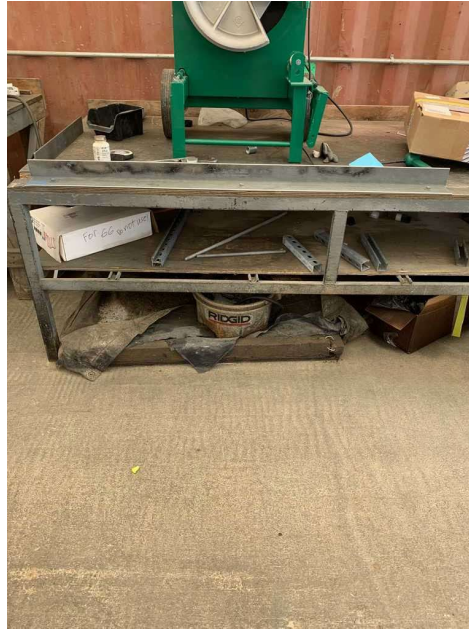
[Title]			IMG_1084.jpg
05/17/2023 11:30 AM	No CBI	No PII	Photographer: Jon Jones
The Mills			48.82835, -122.69856944
Another close-up view of the ~2.5-gallon container, seen in photo IMG_1082.jpg, that contains the same waste oily metal shavings (F037) and is not closed or labeled.			



[Title]			IMG_1085.jpg
05/17/2023 11:34 AM	No CBI	No PII	Photographer: Jon Jones
The Mills			48.82837222, -122.69858611
Another view of the ~2.5-gallon container, seen in photo IMG_1082.jpg, that contains the same waste oily metal shavings (F037) and is not closed or labeled.			



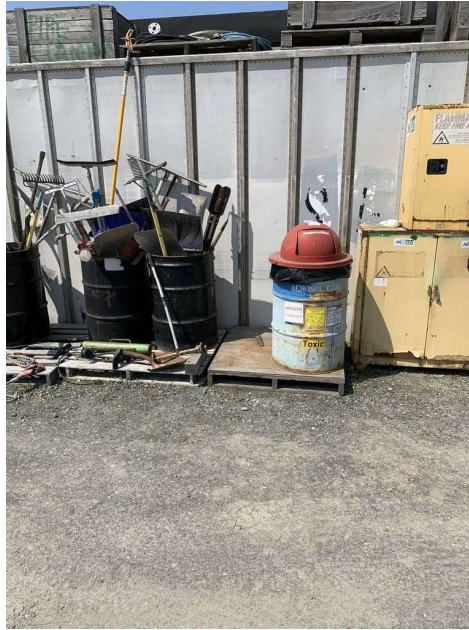
[Title]			IMG_1086.jpg
05/17/2023 11:34 AM	No CBI	No PII	Photographer: Jon Jones
The Mills			48.82835277, -122.69856944
A close-up view of a 5-gallon container, seen in photo IMG_1082.jpg, that contains the same waste oily metal shavings (F037) and is not closed or labeled.			



[Title]			IMG_1087.jpg
05/17/2023 11:34 AM	No CBI	No PII	Photographer: Jon Jones
The Mills			48.82835277, -122.69857777
View of another ~2.5-gallon container, seen under some shelving, that contains the same waste oily metal shavings (F037) and is not closed or labeled.			



[Title]			IMG_1088.jpg
05/17/2023 11:34 AM	No CBI	No PII	Photographer: Jon Jones
The Mills			48.82834166, -122.69859444
Close-up view of the ~2.5-gallon container, seen in photo IMG_1087.jpg, that contains the same waste oily metal shavings (F037) and is not closed or labeled.			



[Title]			IMG_1089.jpg
05/17/2023 11:40 AM	No CBI	No PII	Photographer: Jon Jones
J.H. Kelly Laydown yard			48.82789166, -122.69798333
View of another 55-gallon waste aerosol can SAA that is not closed, due to the design of the swinging door type lid.			



[Title]			IMG_1090.jpg
05/17/2023 11:40 AM	No CBI	No PII	Photographer: Jon Jones
J.H. Kelly Laydown yard			48.82745277, -122.69873055
Close-up view of the labeling on the same waste aerosol can SAA seen in photo IMG_1089.jpg.			



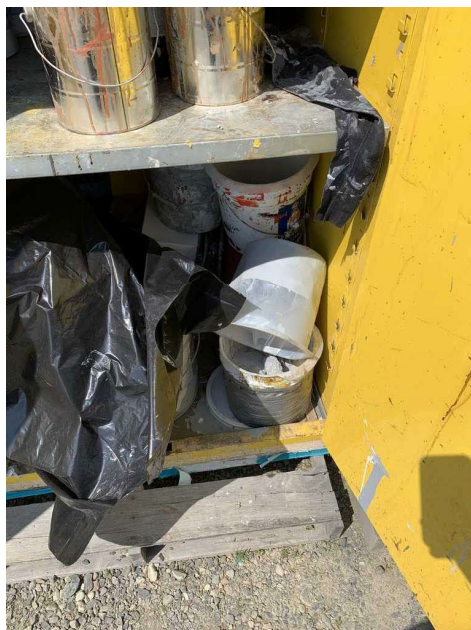
[Title]			IMG_1091.jpg
05/17/2023 11:40 AM	No CBI	No PII	Photographer: Jon Jones
J.H. Kelly Laydown yard			48.82743333, -122.69866944
Another close-up view of the labeling on the same waste aerosol can SAA seen in photo IMG_1089.jpg.			



[Title]			IMG_1092.jpg
05/17/2023 11:40 AM	No CBI	No PII	Photographer: Jon Jones
J.H. Kelly Laydown yard			48.82743888, -122.69866111
Close-up view of the swinging door type lid on the 55-gallon waste aerosol SAA, seen in photo IMG_1089.jpg, showing how the swinging door not only won't close, but doesn't make a complete seal even if it was able to close.			



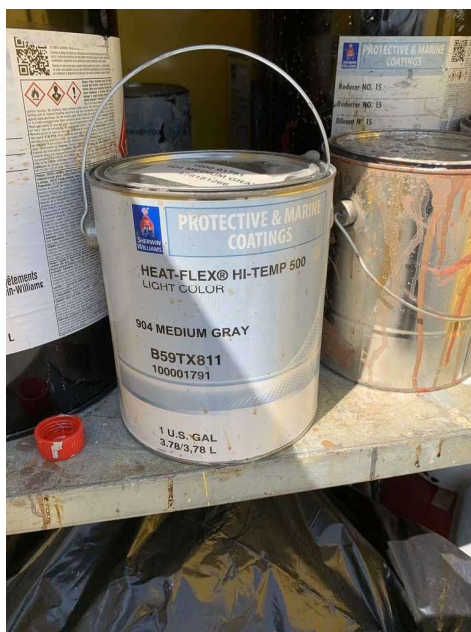
[Title]			IMG_1093.jpg
05/17/2023 11:42 AM	No CBI	No PII	[Photographer]
J.H. Kelly Laydown yard			48.82744722, -122.69873888
View of the yellow flammable storage cabinet, adjacent to the waste aerosol SAA container, that contains waste paint related material that's been allowed to dry out/solidify.			



[Title]			IMG_1094.jpg
05/17/2023 11:42 AM	No CBI	No PII	Photographer: Jon Jones
J.H. Kelly Laydown yard			48.82745833, -122.69876111
View of the waste paint related material in the process of drying out/solidifying in the bottom of the flammable storage cabinet.			



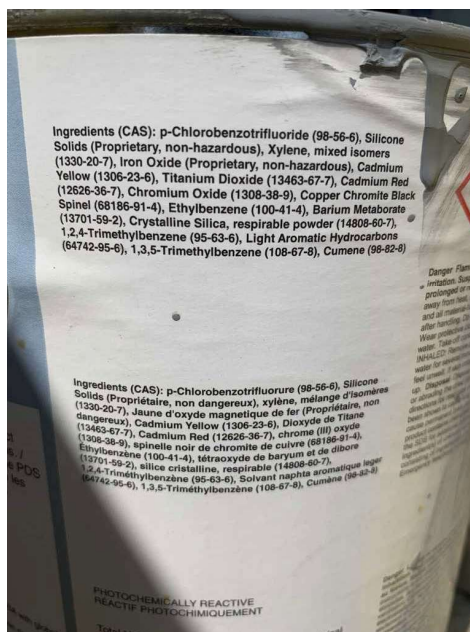
[Title]			IMG_1095.jpg
05/17/2023 11:42 AM	No CBI	No PII	Photographer: Jon Jones
J.H. Kelly Laydown yard			48.82745833, -122.69874444
Close-up view of the waste paint related material in the process of drying out/solidifying in the bottom of the flammable storage cabinet.			



[Title]			IMG_1096.jpg
05/17/2023 11:43 AM	No CBI	No PII	Photographer: Jon Jones
J.H. Kelly Laydown yard			48.82746111, -122.69873888
View of the coating that appeared to match the paint related material that was being allowed to dry out/solidify in the bottom of the cabinet.			



[Title]			IMG_1097.jpg
05/17/2023 11:44 AM	No CBI	No PII	Photographer: Jon Jones
J.H. Kelly Laydown yard			48.82745, -122.69870833
Close-up view of the labeling on the back of the can of paint/coating, seen in photo IMG_1096.jpg, showing the pictogram that indicates the contents are flammable.			



[Title]			IMG_1098.jpg
05/17/2023 11:44 AM	No CBI	No PII	Photographer: Jon Jones
J.H. Kelly Laydown yard			48.82745277, -122.6987
Close-up view of the labeling on the back of the can of paint/coating, seen in photo IMG_1096.jpg, showing the paint/coating ingredients.			



[Title]			IMG_1099.jpg
05/17/2023 11:50 AM	No CBI	No PII	Photographer: Jon Jones
Western Refinery Service Warehouse/Area adjacent to, and outside the WRS Warehouse			48.82806388, -122.69801388
View of another 55-gallon waste aerosol can SAA that is not closed, due to the design of the swinging door type lid.			



[Title]			IMG_1100.jpg
05/17/2023 11:50 AM	No CBI	No PII	Photographer: Jon Jones
Western Refinery Service Warehouse/Area adjacent to, and outside the WRS Warehouse			48.82801388, -122.69802777
Close-up view of the 55-gallon waste aerosol can SAA, seen in photo IMG_1099, that is not closed, due to the design of the swinging door type lid.			



[Title]			IMG_1101.jpg
05/17/2023 11:50 AM	No CBI	No PII	Photographer: Jon Jones
Western Refinery Service Warehouse/Area adjacent to, and outside the WRS Warehouse			48.82798055, -122.69803611
Close-up view of the labeling on the 55-gallon waste aerosol can SAA, seen in photo IMG_1099.			



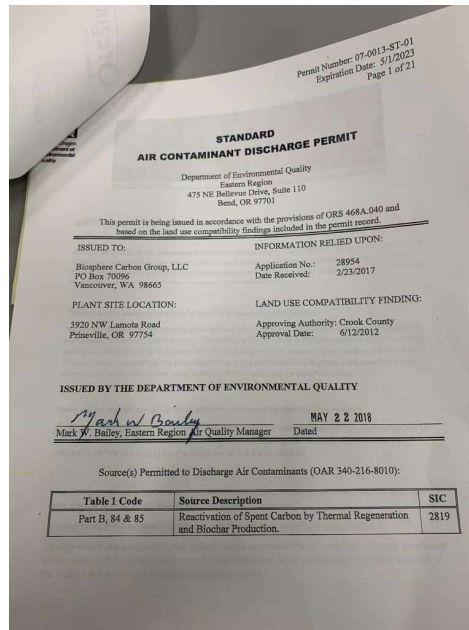
[Title]			IMG_1102.jpg
05/17/2023 11:50 AM	No CBI	No PII	Photographer: Jon Jones
Western Refinery Service Warehouse/Area adjacent to, and outside the WRS Warehouse			48.82798888, -122.69804444
Another close-up view of the labeling on the 55-gallon waste aerosol can SAA, seen in photo IMG_1099.			



[Title]			IMG_1103.jpg
05/17/2023 11:50 AM	No CBI	No PII	Photographer: Jon Jones
Western Refinery Service Warehouse/Area adjacent to, and outside the WRS Warehouse			48.82799166, -122.69805277
Another close-up view of the labeling on the 55-gallon waste aerosol can SAA, seen in photo IMG_1099.			



[Title]			IMG_1104.jpg
05/17/2023 11:50 AM	No CBI	No PII	Photographer: Jon Jones
Western Refinery Service Warehouse/Area adjacent to, and outside the WRS Warehouse			48.828, -122.69806666
Close-up view of the swinging door type lid on the 55-gallon waste aerosol SAA, seen in photo IMG_1099.jpg, showing how the swinging door doesn't make a complete seal even when in the closed position.			



[Title]			IMG_1105.jpg
05/17/2023 02:31 PM	No CBI	No PII	Photographer: Jon Jones
Waste Water Treatment Plant (WWTP)/Lift Station			48.83308888, -122.69338888
View of the site's Standard Air Contaminant Permit.			



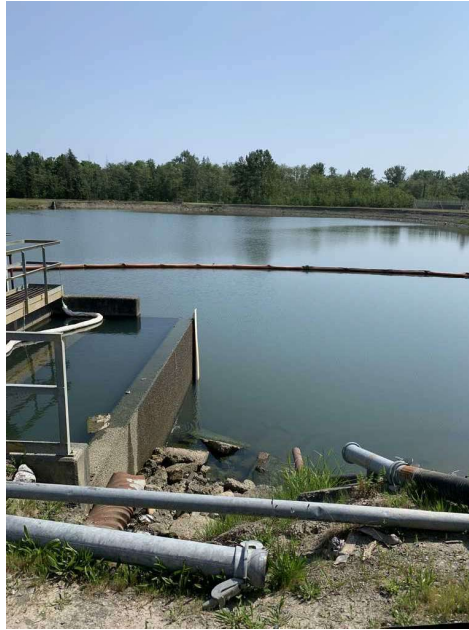
[Title]			IMG_1106.jpg
05/17/2023 03:13 PM	No CBI	No PII	Photographer: Jon Jones
Waste Water Treatment Plant (WWTP)/Lift Station			48.82654444, -122.69780833
View of the location where the sewer lines come together upgradient of the lift station.			



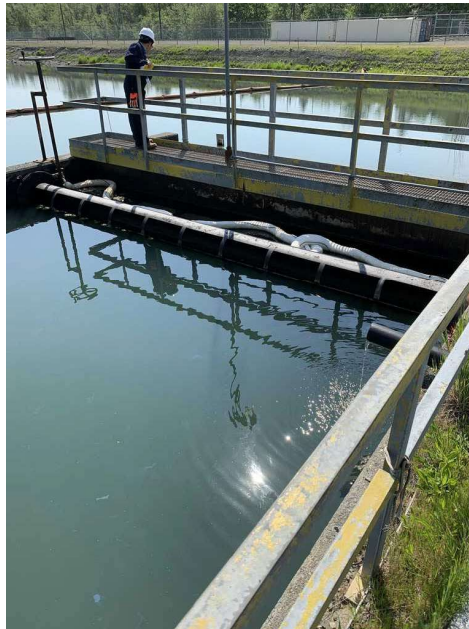
[Title]			IMG_1107.jpg
05/17/2023 03:27 PM	No CBI	No PII	Photographer: Jon Jones
Waste Water Treatment Plant (WWTP)/Lift Station			48.82641666, -122.70316944
View of the Stormwater Observation Channel (SOC).			



[Title]			IMG_1108.jpg
05/17/2023 03:27 PM	No CBI	No PII	Photographer: Jon Jones
Waste Water Treatment Plant (WWTP)/Lift Station			48.82641666, -122.70303333
Another view of the SOC.			



[Title]			IMG_1109.jpg
05/17/2023 03:27 PM	No CBI	No PII	Photographer: Jon Jones
Waste Water Treatment Plant (WWTP)/Lift Station			48.82644722, -122.70308055
A view of the Storm Surge Basin as seen from the SOC.			



[Title]			IMG_1110.jpg
05/17/2023 03:28 PM	No CBI	No PII	Photographer: Jon Jones
Waste Water Treatment Plant (WWTP)/Lift Station			48.826425, -122.70290277
View of the skimmer at the SOC.			



[Title]			IMG_1111.jpg
05/17/2023 03:45 PM	No CBI	No PII	Photographer: Jon Jones
Waste Water Treatment Plant (WWTP)/Lift Station			48.82650277, -122.70356111
View of the lift station.			



[Title]			IMG_1112.jpg
05/17/2023 03:50 PM	No CBI	No PII	Photographer: Jon Jones
Waste Water Treatment Plant (WWTP)/Lift Station			48.82473333, -122.70272777
View of the Storm Surge Basin and SOC, as seen from the Spill Basin.			



[Title]			IMG_1113.jpg
05/17/2023 03:50 PM	No CBI	No PII	Photographer: Jon Jones
Waste Water Treatment Plant (WWTP)/Spill Basin			48.82473888, -122.70271944
View of staining seen here inside the Spill Basin.			



[Title]			IMG_1114.jpg
05/17/2023 03:50 PM	No CBI	No PII	Photographer: Jon Jones
Waste Water Treatment Plant (WWTP)/Spill Basin			48.82475, -122.70272777
View of the site's Spill Basin.			



[Title]			DSCN0705.JPG
05/17/2023 03:50 PM	No CBI	No PII	Photographer: Jackie Vega
Waste Water Treatment Plant (WWTP)/Spill Basin			[Geographic Coordinates]
View of Inlet to Spill Basin from oily water sewer lift station.			



[Title]			IMG_1115.jpg
05/17/2023 03:50 PM	No CBI	No PII	Photographer: Jon Jones
Waste Water Treatment Plant (WWTP)/Spill Basin			48.82466388, -122.70265833
Another view of Inlet to Spill Basin from OWS lift station.			



[Title]			IMG_1116.jpg
05/17/2023 03:51 PM	No CBI	No PII	Photographer: Jon Jones
Waste Water Treatment Plant (WWTP)/Spill Basin			48.82466388, -122.702675
Another view of the site's Spill Basin.			



[Title]			DSCN0706.JPG
05/17/2023 03:51 PM	No CBI	No PII	Photographer: Jackie Vega
Waste Water Treatment Plant (WWTP)/Spill Basin			[Geographic Coordinates]
View of equalization pipe in Spill Basin from Storm Basin.			



[Title]			IMG_1117.jpg
05/17/2023 03:53 PM	No CBI	No PII	Photographer: Jon Jones
Waste Water Treatment Plant (WWTP)/Spill Basin			48.82465277, -122.70265277
Another view of the staining inside the Spill Basin.			



[Title]			DSCN0707.JPG
05/17/2023 03:56 PM	No CBI	No PII	Photographer: Jackie Vega
Waste Water Treatment Plant (WWTP)/Spill Basin			[Geographic Coordinates]
View of discharge out of pipe to Spill Basin from oily water sewer lift station.			



[Title]			DSCN0708.JPG
05/17/2023 03:57 PM	No CBI	No PII	Photographer: Jackie Vega
Waste Water Treatment Plant (WWTP)/Spill Basin			[Geographic Coordinates]
View of oily sheen from lift station pipe discharge flowing down Spill Basin.			



[Title]			DSCN0709.JPG
05/17/2023 03:57 PM	No CBI	No PII	Photographer: Jackie Vega
Waste Water Treatment Plant (WWTP)/Spill Basin			[Geographic Coordinates]
View of Spill Basin overflow pipe to wooded area.			



[Title]			IMG_1118.jpg
05/17/2023 03:57 PM	No CBI	No PII	Photographer: Jon Jones
Waste Water Treatment Plant (WWTP)/Spill Basin			48.82440277, -122.70243888
Another view of discharge out of pipe to Spill Basin from oily water sewer lift station.			



[Title]			IMG_1122.jpg
05/17/2023 03:59 PM	No CBI	No PII	Photographer: Jon Jones
Waste Water Treatment Plant (WWTP)/Spill Basin			48.82437777, -122.7024
View of the discharge sheen coming from the lift station discharge pipe.			



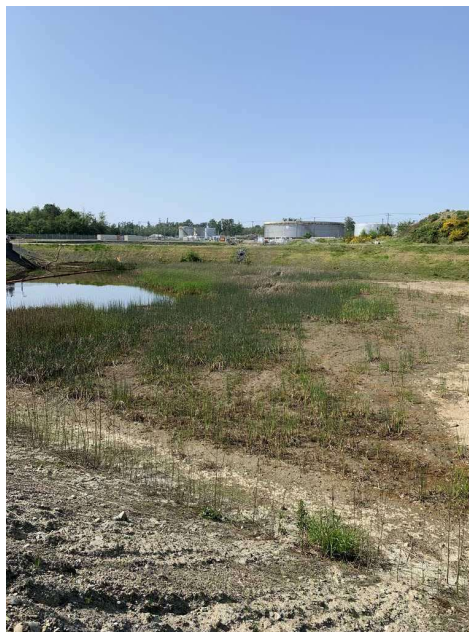
[Title]			IMG_1123.jpg
05/17/2023 03:59 PM	No CBI	No PII	Photographer: Jon Jones
Waste Water Treatment Plant (WWTP)/Spill Basin			48.82438611, -122.7024
Another view of the sheen in the spill basin.			



[Title]			DSCN0710.JPG
05/17/2023 04:02 PM	No CBI	No PII	Photographer: Jackie Vega
Waste Water Treatment Plant (WWTP)/Spill Basin			[Geographic Coordinates]
Overview of Spill Basin, inlet pipe from oily water sewer lift station in background.			



[Title]			IMG_1124.jpg
05/17/2023 04:03 PM	No CBI	No PII	Photographer: Jon Jones
Waste Water Treatment Plant (WWTP)/Spill Basin			48.82421388, -122.70151388
Another overview of Spill Basin and inlet pipe from OWS lift station.			



[Title]			IMG_1125.jpg
05/17/2023 04:03 PM	No CBI	No PII	Photographer: Jon Jones
Waste Water Treatment Plant (WWTP)/Spill Basin			48.82421111, -122.70153055
View of the lift station from the Spill Basin.			



[Title]			IMG_1126.jpg
05/17/2023 04:03 PM	No CBI	No PII	Photographer: Jon Jones
Waste Water Treatment Plant (WWTP)/Spill Basin			48.82420833, -122.70152222
Another view of the Spill Basin.			



[Title]			IMG_1127.jpg
05/17/2023 04:03 PM	No CBI	No PII	Photographer: Jon Jones
Waste Water Treatment Plant (WWTP)/Spill Basin			48.82421111, -122.70152222
Another view of the Spill Basin.			



[Title]			DSCN0711.JPG
05/17/2023 04:03 PM	No CBI	No PII	Photographer: Jackie Vega
Waste Water Treatment Plant (WWTP)/Spill Basin			[Geographic Coordinates]
View of pipe stand at bottom of Spill Basin.			



[Title]			IMG_1128.jpg
05/17/2023 04:03 PM	No CBI	No PII	Photographer: Jon Jones
Waste Water Treatment Plant (WWTP)/Spill Basin			48.82423055, -122.70148333
View of overflow pipe.			



[Title]			DSCN0712.JPG
05/17/2023 04:03 PM	No CBI	No PII	Photographer: Jackie Vega
Waste Water Treatment Plant (WWTP)/Spill Basin			[Geographic Coordinates]
View of unidentified inlet pipe to Spill Basin.			



[Title]			IMG_1129.jpg
05/17/2023 04:04 PM	No CBI	No PII	Photographer: Jon Jones
Waste Water Treatment Plant (WWTP)/Spill Basin			48.82416666, -122.70111111
Another view of the overflow pipe.			



[Title]			IMG_1130.jpg
05/17/2023 04:04 PM	No CBI	No PII	Photographer: Jon Jones
Waste Water Treatment Plant (WWTP)/Spill Basin			48.82416111, -122.70106388
View of outlet of overflow pipe from Spill Basin to wooded area.			



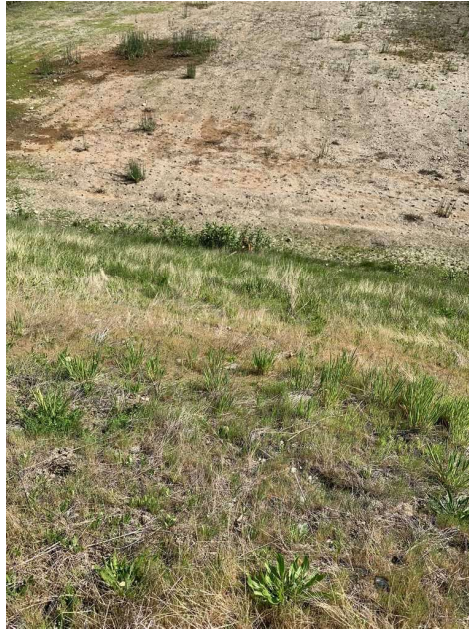
[Title]			DSCN0713.JPG
05/17/2023 04:05 PM	No CBI	No PII	Photographer: Jackie Vega
Waste Water Treatment Plant (WWTP)/Spill Basin			[Geographic Coordinates]
View of outlet of overflow pipe from Spill Basin to wooded area.			



[Title]			IMG_1131.jpg
05/17/2023 04:10 PM	No CBI	No PII	Photographer: Jon Jones
Waste Water Treatment Plant (WWTP)/Spill Basin			48.82497777, -122.70086666
Closer view of unidentified inlet pipe to Spill Basin, first seen in photo DSCN0712.JPG at the top of page 115 of 175.			



[Title]			IMG_1132.jpg
05/17/2023 04:10 PM	No CBI	No PII	Photographer: Jon Jones
Waste Water Treatment Plant (WWTP)/Spill Basin			48.82498055, -122.70088333
Closer view of unidentified inlet pipe to Spill Basin, seen in photo IMG_1131.jpg above.			



[Title]			IMG_1133.jpg
05/17/2023 04:11 PM	No CBI	No PII	Photographer: Jon Jones
Waste Water Treatment Plant (WWTP)/Spill Basin			48.82504166, -122.70085833
Another view of the spill basin.			



[Title]			IMG_1134.jpg
05/17/2023 04:12 PM	No CBI	No PII	Photographer: Jon Jones
Waste Water Treatment Plant (WWTP)/Spill Basin			48.82506111, -122.70141666
Another view of the pipe stand, seen in photo DSCN0711.JPG at the top of page 114 of 175.			



[Title]			IMG_1135.jpg
05/17/2023 04:12 PM	No CBI	No PII	Photographer: Jon Jones
Waste Water Treatment Plant (WWTP)/Spill Basin			48.8251, -122.70156111
Another view of the pipe stand.			



[Title]			IMG_1136.jpg
05/17/2023 04:31 PM	No CBI	No PII	Photographer: Jon Jones
Waste Water Treatment Plant (WWTP)			48.82746944, -122.705375
View of the waste aerosol SAA container outside of the WWTP Shop, seen here with the same style of lid that does not make a complete seal with the container when closed.			



[Title]			IMG_1137.jpg
05/17/2023 04:31 PM	No CBI	No PII	Photographer: Jon Jones
Waste Water Treatment Plant (WWTP)			48.82746944, -122.7053
View of the labeling on the waste aerosol SAA container.			



[Title]			IMG_1138.jpg
05/17/2023 04:32 PM	No CBI	No PII	Photographer: Jon Jones
Waste Water Treatment Plant (WWTP)			48.82746111, -122.70526111
Another view of the labeling on the waste aerosol SAA container.			



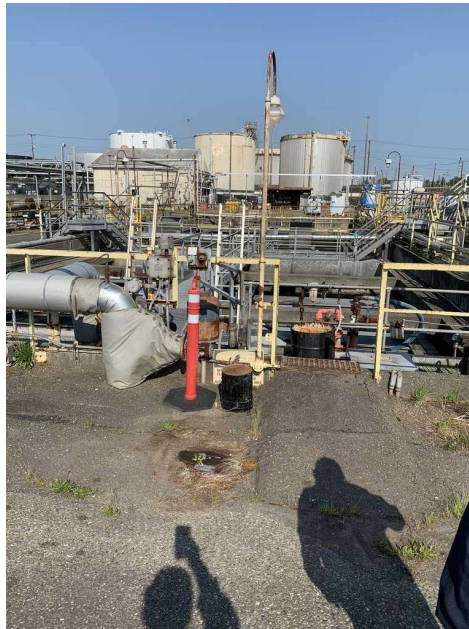
[Title]			IMG_1139.jpg
05/17/2023 04:33 PM	No CBI	No PII	Photographer: Jon Jones
Waste Water Treatment Plant (WWTP)			48.82748333, -122.70539166
A close-up view of the waste aerosol SAA container outside of the WWTP Shop, seen here with the same style of lid that does not make a complete seal with the container when closed.			



[Title]			IMG_1144.jpg
05/17/2023 04:43 PM	No CBI	No PII	Photographer: Jon Jones
Waste Water Treatment Plant (WWTP)			48.827525, -122.70548888
View of API oil/water separator.			



[Title]			IMG_1145.jpg
05/17/2023 04:43 PM	No CBI	No PII	Photographer: Jon Jones
Waste Water Treatment Plant (WWTP)			48.82746388, -122.70577222
View of equalization tanks.			



[Title]			IMG_1147.jpg
05/17/2023 04:46 PM	No CBI	No PII	Photographer: Jon Jones
Waste Water Treatment Plant (WWTP)			48.82743055, -122.706375
Another view of the API oil/water separator, first seen in IMG_1144.			



[Title]			IMG_1148.jpg
05/17/2023 04:47 PM	No CBI	No PII	Photographer: Jon Jones
Waste Water Treatment Plant (WWTP)			48.82752222, -122.70555833
View of DAF.			



[Title]			IMG_1149.jpg
05/17/2023 04:51 PM	No CBI	No PII	Photographer: Jon Jones
Waste Water Treatment Plant (WWTP)			48.82759166, -122.70542222
View of MBBR unit.			



[Title]			IMG_1150.jpg
05/17/2023 04:51 PM	No CBI	No PII	Photographer: Jon Jones
Waste Water Treatment Plant (WWTP)			48.82771388, -122.70607777
Another view of MBBR unit.			



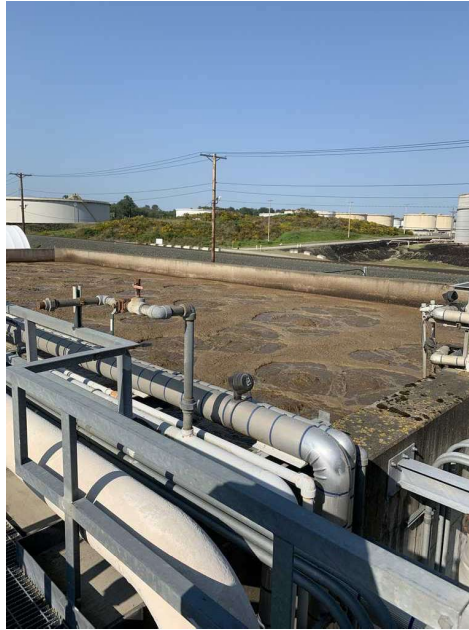
[Title]			IMG_1151.jpg
05/17/2023 04:57 PM	No CBI	No PII	Photographer: Jon Jones
Waste Water Treatment Plant (WWTP)			48.82735833, -122.70589444
View of grab sample collection point for MBBR unit.			



[Title]			IMG_1152.jpg
05/17/2023 04:57 PM	No CBI	No PII	Photographer: Jon Jones
Waste Water Treatment Plant (WWTP)			48.82733611, -122.70591111
Close-up view of grab sample collection point for MBBR unit.			



[Title]			IMG_1154.jpg
05/17/2023 05:02 PM	No CBI	No PII	Photographer: Jon Jones
Waste Water Treatment Plant (WWTP)			48.82787222, -122.70461944
View of aeration basin.			



[Title]			IMG_1155.jpg
05/17/2023 05:02 PM	No CBI	No PII	Photographer: Jon Jones
Waste Water Treatment Plant (WWTP)			48.82859722, -122.70505555
Another view of aeration basin.			



[Title]			IMG_1156.jpg
05/17/2023 05:05 PM	No CBI	No PII	Photographer: Jon Jones
Waste Water Treatment Plant (WWTP)			48.82759444, -122.70542777
View of clarifier, as seen from aeration basin.			



[Title]			IMG_1157.jpg
05/17/2023 05:05 PM	No CBI	No PII	Photographer: Jon Jones
Waste Water Treatment Plant (WWTP)			48.82851111, -122.70506944
View of clarifiers, as seen from aeration basin.			



[Title]			IMG_1158.jpg
05/17/2023 05:08 PM	No CBI	No PII	Photographer: Jon Jones
Waste Water Treatment Plant (WWTP)/Lift Station			48.82755555, -122.70556666
View of the stabilization pond.			



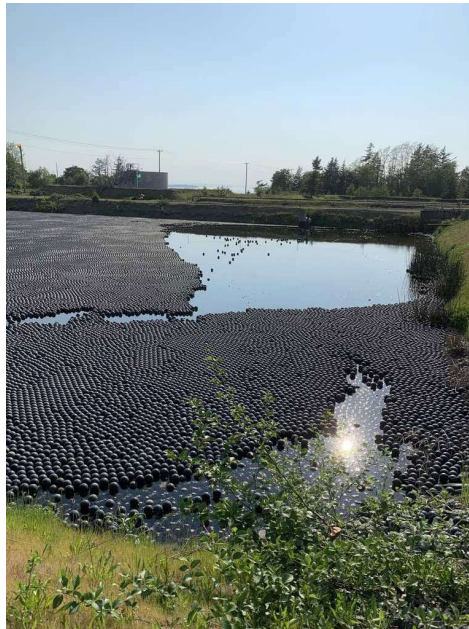
[Title]			IMG_1159.jpg
05/17/2023 05:12 PM	No CBI	No PII	Photographer: Jon Jones
Waste Water Treatment Plant (WWTP)			48.82755555, -122.705575
View of discharge into the Sludge Stabilization Pond.			



[Title]			IMG_1161.jpg
05/17/2023 05:12 PM	No CBI	No PII	Photographer: Jon Jones
Waste Water Treatment Plant (WWTP)			48.82826944, -122.70583333
Another view of discharge into the Sludge Stabilization Pond.			



[Title]			IMG_1162.jpg
05/17/2023 05:32 PM	No CBI	No PII	Photographer: Jon Jones
Waste Water Treatment Plant (WWTP)			48.82756111, -122.70553611
View of temporary secondary unit adding chlorine for fecal, if needed.			



[Title]			IMG_1163.jpg
05/17/2023 05:37 PM	No CBI	No PII	Photographer: Jon Jones
Waste Water Treatment Plant (WWTP)			48.82783055, -122.706475
View of the Catchment Basin.			



[Title]			IMG_1164.jpg
05/17/2023 05:37 PM	No CBI	No PII	Photographer: Jon Jones
Waste Water Treatment Plant (WWTP)			48.82783055, -122.70648055
Another view of the Catchment Basin.			



[Title]			DSCN0714.JPG
05/17/2023 05:37 PM	No CBI	No PII	Photographer: Jackie Vega
Waste Water Treatment Plant (WWTP)			[Geographic Coordinates]
View of Catchment Basin with black balls for prohibiting algae growth.			



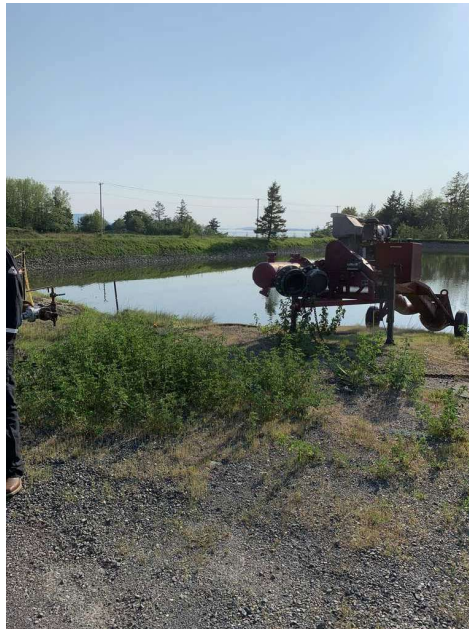
[Title]			IMG_1165.jpg
05/17/2023 05:43 PM	No CBI	No PII	Photographer: Jon Jones
Waste Water Treatment Plant (WWTP)			48.82806388, -122.70723611
View of the Final Holding Pond.			



[Title]			IMG_1166.jpg
05/17/2023 05:43 PM	No CBI	No PII	Photographer: Jon Jones
Waste Water Treatment Plant (WWTP)			48.828075, -122.70723611
Another view of the Final Holding Pond.			



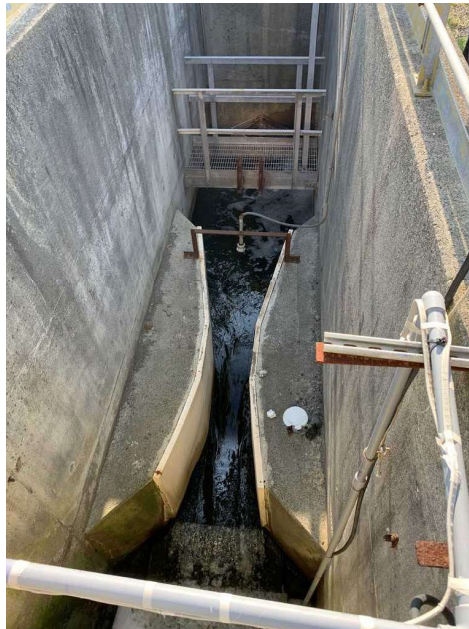
[Title]			IMG_1167.jpg
05/17/2023 05:43 PM	No CBI	No PII	Photographer: Jon Jones
Waste Water Treatment Plant (WWTP)			48.828075, -122.70723611
Another view of the Final Holding Pond.			



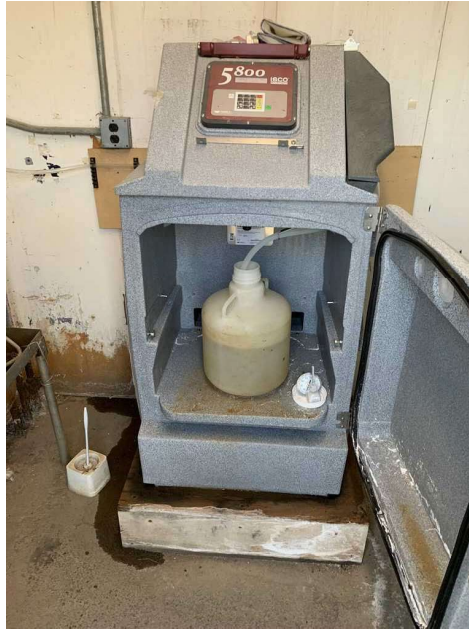
[Title]			IMG_1168.jpg
05/17/2023 05:43 PM	No CBI	No PII	Photographer: Jon Jones
Waste Water Treatment Plant (WWTP)			48.82805555, -122.70726111
Another view of the Final Holding Pond.			



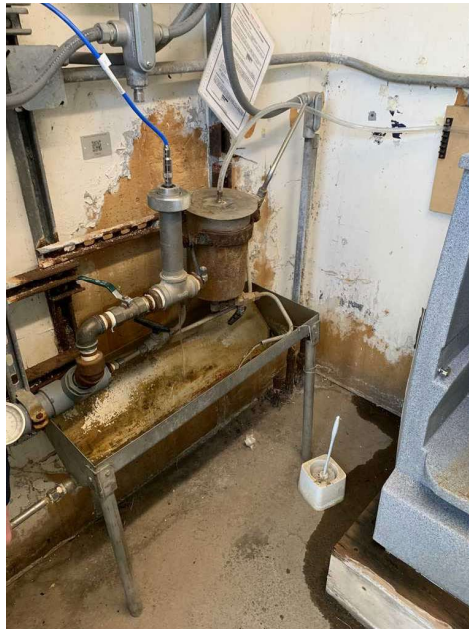
[Title]			IMG_1169.jpg
05/17/2023 05:48 PM	No CBI	No PII	Photographer: Jon Jones
Waste Water Treatment Plant (WWTP)			48.82736111, -122.70696388
View of weir, as seen from catchment basin.			



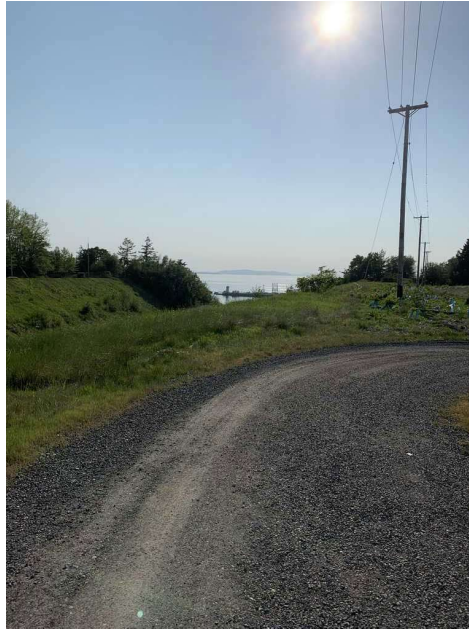
[Title]			IMG_1172.jpg
05/17/2023 05:50 PM	No CBI	No PII	Photographer: Jon Jones
Waste Water Treatment Plant (WWTP)			48.82723888, -122.70656666
View of the parshall flume.			



[Title]			IMG_1173.jpg
05/17/2023 05:52 PM	No CBI	No PII	Photographer: Jon Jones
Waste Water Treatment Plant (WWTP)			48.82705277, -122.70709166
View of the sampler ahead of the outfall.			



[Title]			IMG_1174.jpg
05/17/2023 05:52 PM	No CBI	No PII	Photographer: Jon Jones
Waste Water Treatment Plant (WWTP)			48.82705277, -122.70706111
View of grab sample location next to compositor.			



[Title]			IMG_1175.jpg
05/17/2023 05:53 PM	No CBI	No PII	Photographer: Jon Jones
Waste Water Treatment Plant (WWTP)			48.82724722, -122.70626944
View in the general direction of the outfall.			



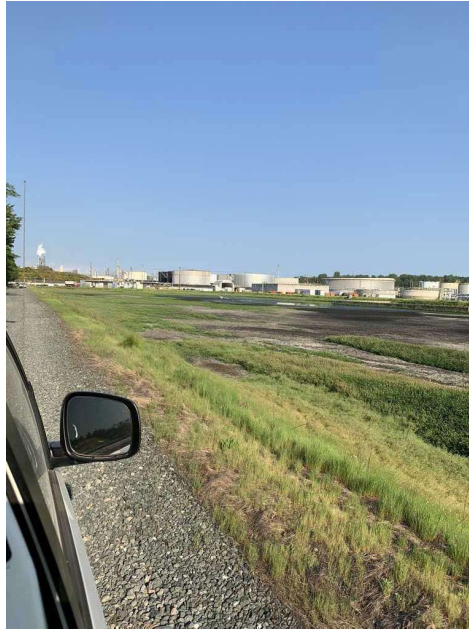
[Title]			IMG_1176.jpg
05/17/2023 05:53 PM	No CBI	No PII	Photographer: Jon Jones
Waste Water Treatment Plant (WWTP)			48.82706111, -122.70716944
Close-up view in the general direction of the outfall.			



[Title]			IMG_1177.jpg
05/17/2023 06:02 PM	No CBI	No PII	Photographer: Jon Jones
Waste Water Treatment Plant (WWTP)			48.82998611, -122.70829722
View of Dewatering Pond.			



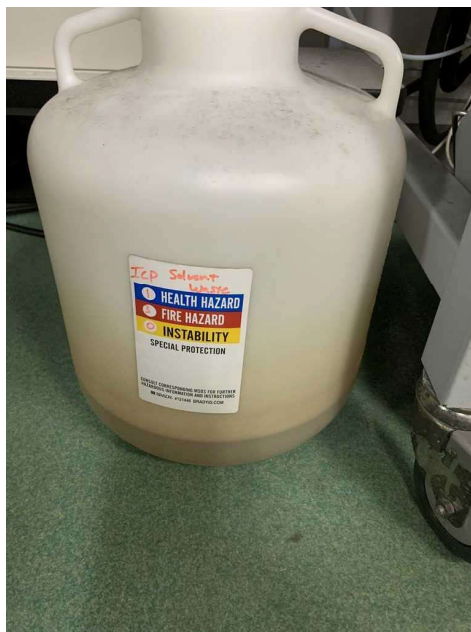
[Title]			IMG_1178.jpg
05/17/2023 06:02 PM	No CBI	No PII	Photographer: Jon Jones
Waste Water Treatment Plant (WWTP)			48.82997777, -122.70830555
Another view of Dewatering Pond.			



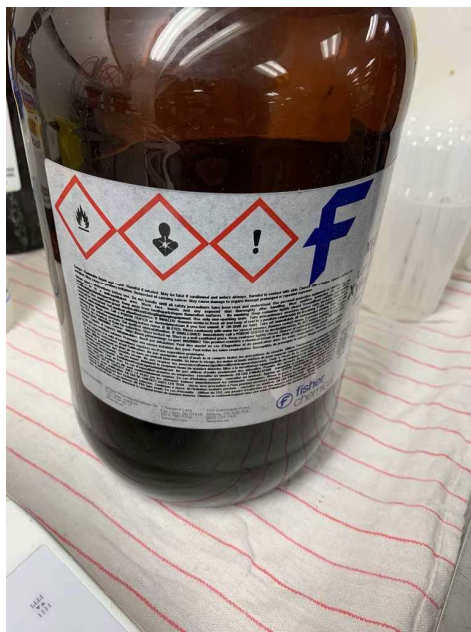
[Title]			IMG_1179.jpg
05/17/2023 06:02 PM	No CBI	No PII	Photographer: Jon Jones
Waste Water Treatment Plant (WWTP)			48.82999444, -122.708375
Another view of Dewatering Pond.			



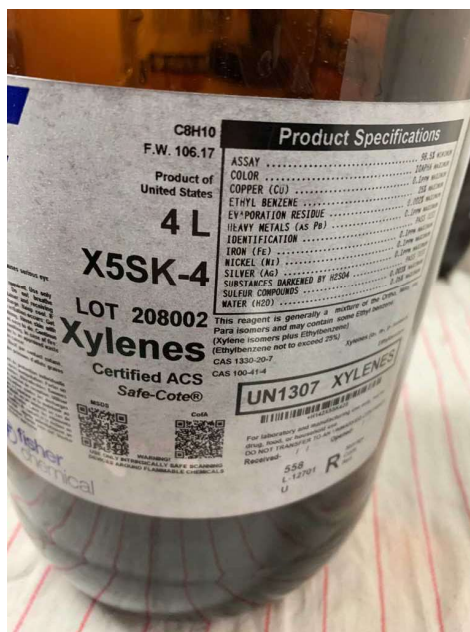
[Title]			IMG_1180.jpg
05/18/2023 09:43 AM	No CBI	No PII	Photographer: Jon Jones
Lab/Optical Emission Spectrometer			48.8316, -122.69035277
View of a 2-gallon, poly, hazardous waste container of waste ICP Solvent (Xylene) that is not labeled with the words "Hazardous Waste."			



[Title]			IMG_1181.jpg
05/18/2023 09:43 AM	No CBI	No PII	Photographer: Jon Jones
Lab/Optical Emission Spectrometer			48.8316, -122.69036111
Close-up view of a 2-gallon, poly, hazardous waste container of waste ICP Solvent (Xylene) that is not labeled with the words "Hazardous Waste."			



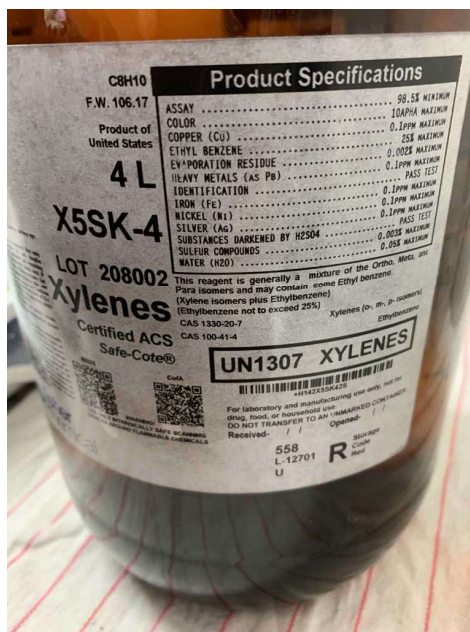
[Title]			IMG_1182.jpg
05/18/2023 09:51 AM	No CBI	No PII	Photographer: Jon Jones
Lab			48.83163888, -122.69048333
View of the labeling on a container of xylene that is used in the lab.			



[Title]			IMG_1183.jpg
05/18/2023 09:51 AM	No CBI	No PII	Photographer: Jon Jones
Lab			48.83162222, -122.69043055
Close-up view of the labeling on a container of xylene that is used in the lab.			



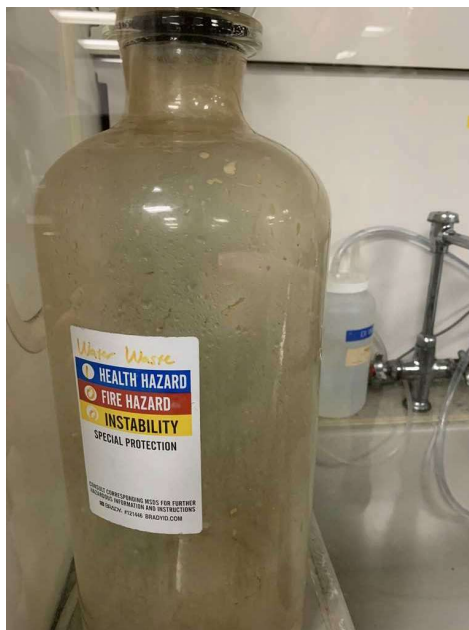
[Title]			IMG_1184.jpg
05/18/2023 09:53 AM	No CBI	No PII	Photographer: Jon Jones
Lab			48.83162777, -122.69044444
View of the labeling on a container of xylene that is used in the lab.			



[Title]			IMG_1185.jpg
05/18/2023 09:53 AM	No CBI	No PII	Photographer: Jon Jones
Lab			48.8316, -122.69036111
Another close-up view of the labeling on a container of xylene that is used in the lab.			



[Title]			IMG_1186.jpg
05/18/2023 10:06 AM	No CBI	No PII	Photographer: Jon Jones
Lab			48.83163333, -122.69048333
View of waste containers inside of a fume hood that the chemist told us held non-hazardous wastes.			



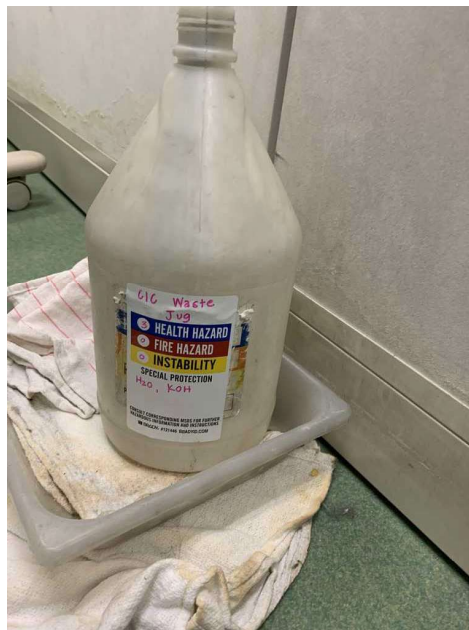
[Title]			IMG_1187.jpg
05/18/2023 10:06 AM	No CBI	No PII	Photographer: Jon Jones
Lab			48.83160833, -122.690375
Close-up view of waste container inside of a fume hood that the chemist told us held non-hazardous waste.			



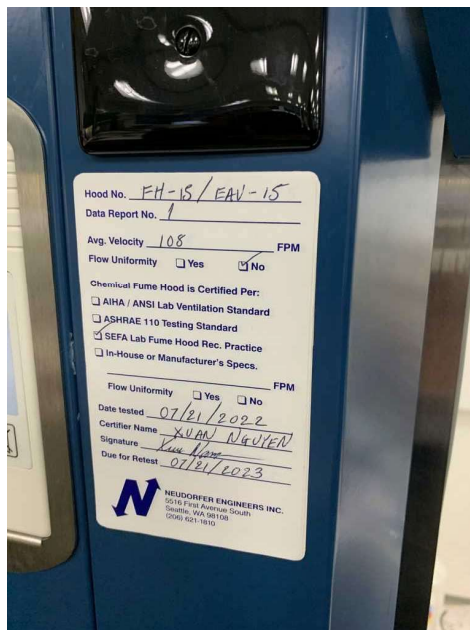
[Title]			IMG_1188.jpg
05/18/2023 10:07 AM	No CBI	No PII	Photographer: Jon Jones
Lab/Fume Hood FH-06/EAV-06			48.83159722, -122.69036111
View of containers that hold sample waste and acid wastes that are seen here not labeled with the words "Hazardous Waste."			



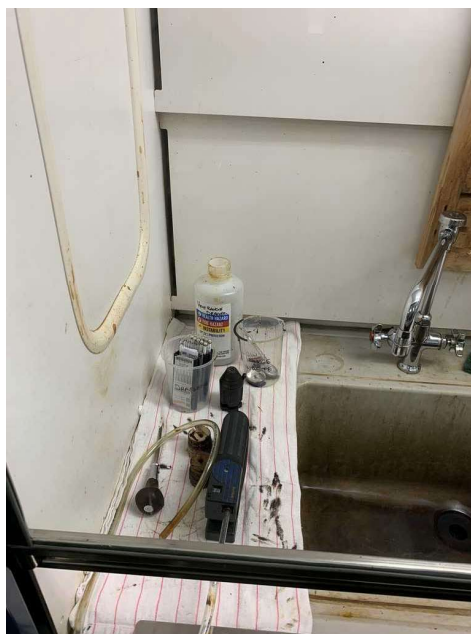
[Title]			IMG_1189.jpg
05/18/2023 10:11 AM	No CBI	No PII	Photographer: Jon Jones
Lab			48.8316, -122.69036111
View of a 1-gallon container of chromatograph waste that is not labeled with the words "Hazardous Waste."			



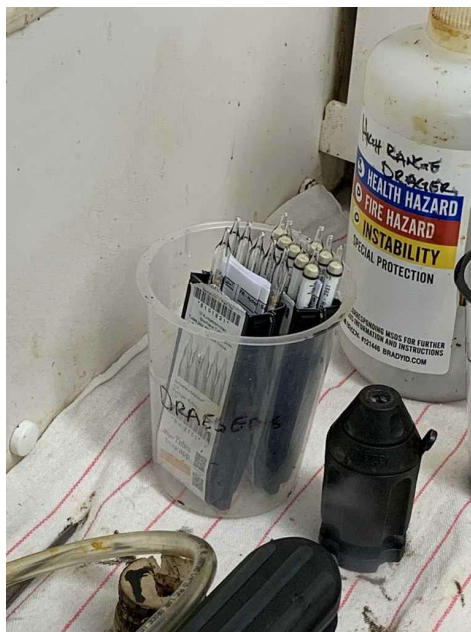
[Title]			IMG_1190.jpg
05/18/2023 10:11 AM	No CBI	No PII	Photographer: Jon Jones
Lab			48.8316, -122.69036111
Close-up view of a 1-gallon container of chromatograph waste that is not labeled with the words "Hazardous Waste."			



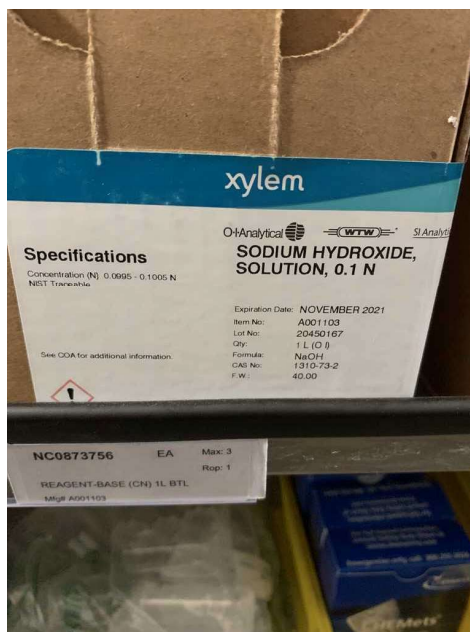
[Title]			IMG_1191.jpg
05/18/2023 10:15 AM	No CBI	No PII	Photographer: Jon Jones
Lab/Fume Hood FH-15/EAV-15			48.83163888, -122.69048333
View of the numbering on the fume hood.			



[Title]			IMG_1192.jpg
05/18/2023 10:15 AM	No CBI	No PII	Photographer: Jon Jones
Lab/Fume Hood FH-15/EAV-15			48.83162222, -122.69043055
View of a beaker inside the fume hood that is holding some spent/used Draeger tubes, seen here not closed, not labeled "Hazardous Waste," and not marked with a hazard indicator.			



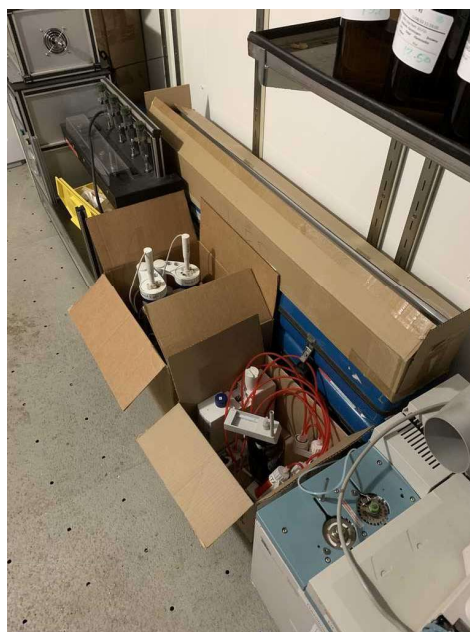
[Title]			IMG_1193.jpg
05/18/2023 10:15 AM	No CBI	No PII	Photographer: Jon Jones
Lab/Fume Hood FH-15/EAV-15			48.8316, -122.69035277
Close-up view of a beaker inside the fume hood that is holding some spent/used Draeger tubes, seen here not closed, not labeled "Hazardous Waste," and not marked with a hazard indicator.			



[Title]			IMG_1199.jpg
05/18/2023 10:40 AM	No CBI	No PII	Photographer: Jon Jones
Lab/North Connex			48.83161111, -122.69049722
View of a container of expired sodium hydroxide, seen here with an expiration date of November 2021.			



[Title]			IMG_1200.jpg
05/18/2023 10:43 AM	No CBI	No PII	Photographer: Jon Jones
Lab/North Connex			48.83161111, -122.69036111
View of a container of A-6000 Activator Solution that is expired, seen here with an expiration date of January 2021 and hazard indicators for both toxicity and corrosivity.			



[Title]			IMG_1201.jpg
05/18/2023 10:56 AM	No CBI	No PII	Photographer: Jon Jones
Lab/South Connex			48.83161111, -122.69036111
View of waste fluorescent lamps in a container, seen here on the floor, that is not closed and not labeled universal waste lamps. The open box of waste lamps had also been in storage for greater than 2 years.			



[Title]			IMG_1202.jpg
05/18/2023 10:56 AM	No CBI	No PII	Photographer: Jon Jones
Lab/South Connex			48.83157777, -122.69031388
View of waste fluorescent lamps in a container, seen here on the top shelf, that is not closed and not labeled universal waste lamps. The open box of waste lamps had also been in storage for greater than 2 years.			



[Title]			IMG_1203.jpg
05/18/2023 10:56 AM	No CBI	No PII	Photographer: Jon Jones
Lab/South Connex			48.83155555, -122.69044444
A close-up view of the waste lamps in the box seen in IMG_1201.jpg.			



[Title]			IMG_1204.jpg
05/18/2023 10:56 AM	No CBI	No PII	Photographer: Jon Jones
Lab/South Connex			48.83155555, -122.69044444
Another view of the open box of waste lamps labeled as "Used" seen in IMG_1202.jpg.			



[Title]			IMG_1205.jpg
05/18/2023 10:56 AM	No CBI	No PII	Photographer: Jon Jones
Lab/South Connex			48.83115277, -122.69178055
Close-up view of the waste lamps in the container that's not closed and the waste CFLs that are not packaged. Both seen here not labeled as universal waste lamps and in storage greater than 2 years.			



[Title]			IMG_1206.jpg
05/18/2023 10:56 AM	No CBI	No PII	Photographer: Jon Jones
Lab/South Connex			48.83091388, -122.69123055
Close-up view of the waste CFLs.			



[Title]			IMG_1207.jpg
05/18/2023 10:59 AM	No CBI	No PII	Photographer: Jon Jones
Lab/South Connex			48.83113611, -122.69105555
Close-up view of one of the waste CFLs labeled as "Used."			



[Title]			IMG_1210.jpg
05/18/2023 11:30 AM	No CBI	No PII	Photographer: Jon Jones
Spent fluorescent lamp storage			48.82668333, -122.69506944
View of a container of universal waste lamps that is seen here not closed.			



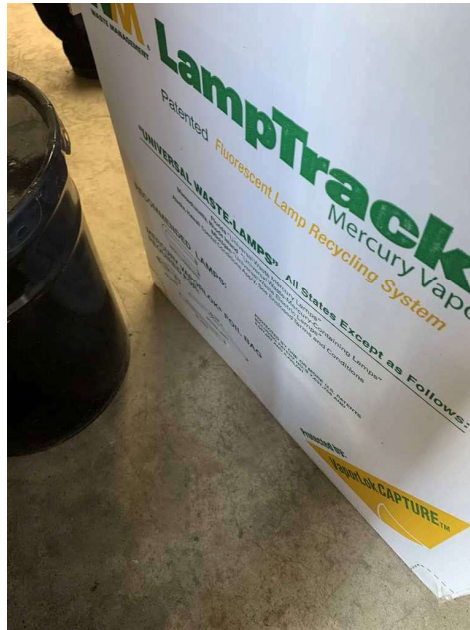
[Title]			IMG_1211.jpg
05/18/2023 11:30 AM	No CBI	No PII	Photographer: Jon Jones
Spent fluorescent lamp storage			48.826225, -122.69421388
View of a container of universal waste lamps that is seen here not closed.			



[Title]			IMG_1212.jpg
05/18/2023 11:30 AM	No CBI	No PII	Photographer: Jon Jones
Spent fluorescent lamp storage			48.82603333, -122.69357222
View of a container of universal waste High-pressure sodium lamps that is seen here not closed.			



[Title]			IMG_1214.jpg
05/18/2023 11:30 AM	No CBI	No PII	Photographer: Jon Jones
Spent fluorescent lamp storage			48.82603888, -122.69358055
View of the universal waste lamp containers, showing that they are labeled.			



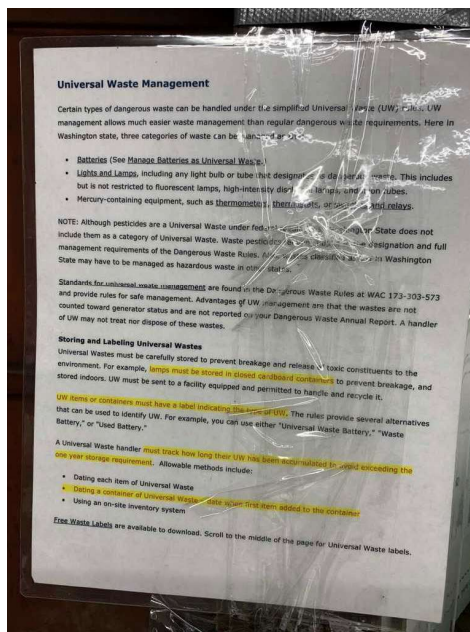
[Title]			IMG_1215.jpg
05/18/2023 11:31 AM	No CBI	No PII	Photographer: Jon Jones
Spent fluorescent lamp storage			48.82605, -122.69358888
View of the universal waste lamp containers, showing that they are labeled.			



[Title]			IMG_1216.jpg
05/18/2023 11:35 AM	No CBI	No PII	Photographer: Jon Jones
Spent fluorescent lamp storage			[Geographic Coordinates]
View of a waste battery that is labeled with the word "Bad" and not labeled with the words "Universal Waste-battery."			



[Title]			IMG_1217.jpg
05/18/2023 11:39 AM	No CBI	No PII	Photographer: Jon Jones
Spent fluorescent lamp storage			48.80357777, -122.72169444
View of the universal waste signage posted in the area.			



[Title]			IMG_1218.jpg
05/18/2023 11:39 AM	No CBI	No PII	Photographer: Jon Jones
Spent fluorescent lamp storage			48.80357777, -122.72169444
Close-up view of the signage in the area, regarding the management of universal waste.			



[Title]			IMG_1219.jpg
05/18/2023 11:47 AM	No CBI	No PII	Photographer: Jon Jones
Spent carbon storage area			48.83016944, -122.70407777
View of the supersacks containing spent carbon for reclamation.			



[Title]			IMG_1220.jpg
05/18/2023 11:47 AM	No CBI	No PII	Photographer: Jon Jones
Spent carbon storage area			48.82910277, -122.70494166
View of spent carbon seen here on the ground, at the entrance of the storage area.			



[Title]			IMG_1221.jpg
05/18/2023 11:47 AM	No CBI	No PII	Photographer: Jon Jones
Spent carbon storage area			48.82910833, -122.70493333
Another view of spent carbon seen here on the ground, at the entrance of the storage area.			



[Title]			IMG_1222.jpg
05/18/2023 11:47 AM	No CBI	No PII	Photographer: Jon Jones
Spent carbon storage area			48.82911388, -122.70491666
Another view of spent carbon seen here on the ground, at the entrance of the storage area.			



[Title]			IMG_1223.jpg
05/18/2023 11:47 AM	No CBI	No PII	Photographer: Jon Jones
Spent carbon storage area			48.82911388, -122.70483333
View of reclaimed carbon.			



[Title]			IMG_1224.jpg
05/18/2023 11:47 AM	No CBI	No PII	[Photographer]
Spent carbon storage area			48.82910833, -122.70485
View of reclaimed carbon.			



[Title]			IMG_1225.jpg
05/18/2023 11:48 AM	No CBI	No PII	Photographer: Jon Jones
Spent carbon storage area			48.82911388, -122.704825
View of the supersacks containing spent carbon for reclamation.			



[Title]			IMG_1226.jpg
05/18/2023 11:48 AM	No CBI	No PII	Photographer: Jon Jones
Spent carbon storage area			48.82910555, -122.70483333
View of the supersacks containing spent carbon for reclamation.			



[Title]			IMG_1227.jpg
05/18/2023 11:48 AM	No CBI	No PII	Photographer: Jon Jones
Spent carbon storage area			48.82908611, -122.70485
View of the supersacks containing spent carbon for reclamation.			



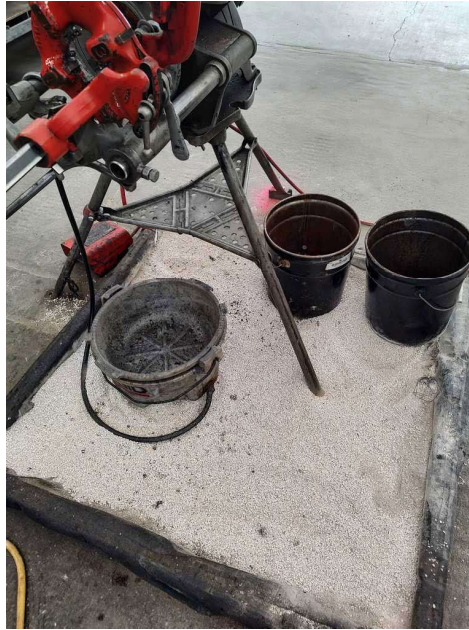
[Title]			IMG_1228.jpg
05/18/2023 11:48 AM	No CBI	No PII	Photographer: Jon Jones
Spent carbon storage area			48.82908611, -122.70484166
View of the supersacks containing spent carbon for reclamation.			



[Title]			IMG_1229.jpg
05/18/2023 11:49 AM	No CBI	No PII	Photographer: Jon Jones
Spent carbon storage area			48.82905277, -122.70494722
View of the supersacks containing spent carbon for reclamation.			



[Title]			IMG_1230.jpg
05/18/2023 12:00 PM	No CBI	No PII	Photographer: Jon Jones
[Building/Area]			48.83214166, -122.69165
View of the gloves, including leather gloves, that are supplied or issued to personnel at the refinery.			



[Title]			Metal Shavings Area (1).jpg
05/18/2023 03:03 PM	No CBI	No PII	Photographer: Submitted by Site
The Mills			[Geographic Coordinates]
View of the area after the waste metal shavings had been put into the SAA container.			



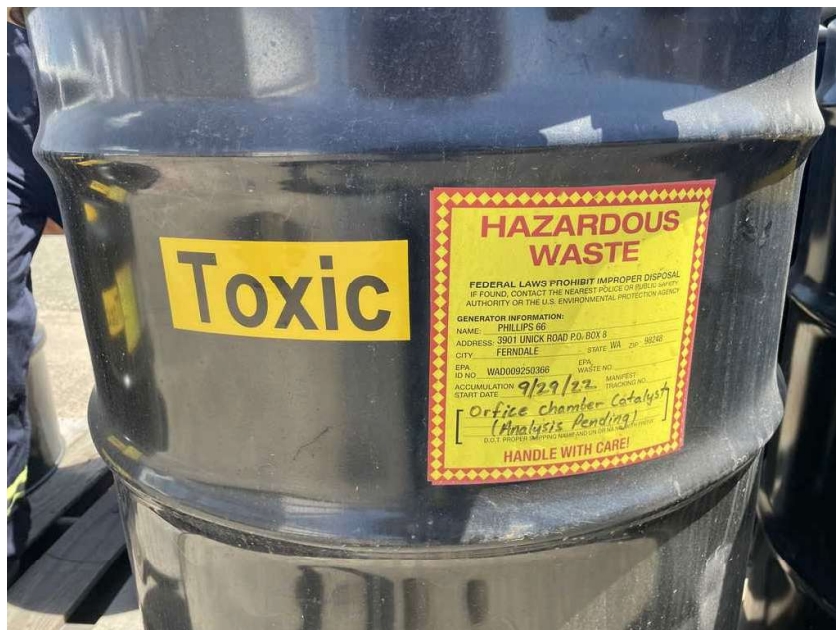
[Title]			Metal Shavings Area (2).jpg
05/18/2023 03:04 PM	No CBI	No PII	Photographer: Submitted by Site
The Mills			[Geographic Coordinates]
View of the area after the waste metal shavings had been put into the SAA container.			



[Title]			Metal Shavings Area Drum.jpg
05/18/2023 03:04 PM	No CBI	No PII	Photographer: Submitted by Site
The Mills			[Geographic Coordinates]
View of SAA container after being closed.			



[Title]			Metal Shavings Area (3).jpg
05/18/2023 03:04 PM	No CBI	No PII	Photographer: Submitted by Site
The Mills			[Geographic Coordinates]
View of the area after the waste metal shavings had been put into the SAA container.			



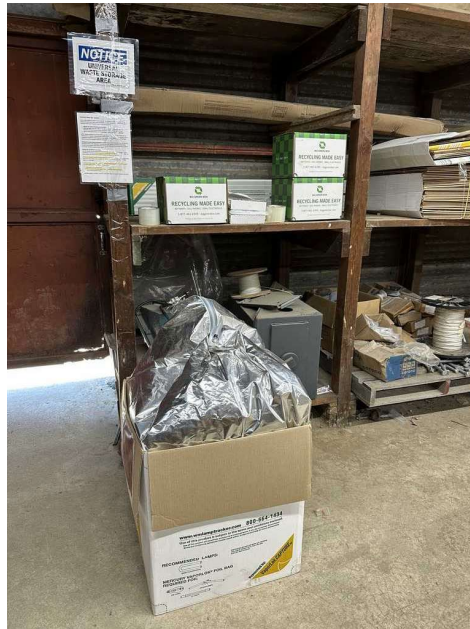
[Title]			Drum Hazard Indicator (1).jpg
05/19/2023 12:46 PM	No CBI	No PII	Photographer: Submitted by Site
Refinery/Permitted RCRA storage area			48.82745833, -122.690675
View of container after the hazard indicator was added.			



[Title]			Drum Hazard Indicator (2).jpg
05/19/2023 12:46 PM	No CBI	No PII	Photographer: Submitted by Site
Refinery/Permitted RCRA storage area			48.82746944, -122.69066666
View of container after the hazard indicator was added.			



[Title]			Used Oil Drums Clsoed.jpg
05/19/2023 12:47 PM	No CBI	No PII	Photographer: Submitted by Site
Refinery/Used oil pad			48.82765277, -122.69031388
View of the used oil storage containers after being closed.			



[Title]			Bulb Universal Storage (1).jpg
05/19/2023 01:28 PM	No CBI	No PII	Photographer: Submitted by Site
Spent fluorescent lamp storage			48.82691944, -122.69412222
View of corrective action taken by the facility to close containers of universal waste lamps.			



[Title]			Bulb Universal Storage (2).jpg
05/19/2023 01:28 PM	No CBI	No PII	Photographer: Submitted by Site
Spent fluorescent lamp storage			48.82691944, -122.69412222
View of corrective action taken by the facility to close containers of universal waste lamps.			



[Title]			Old Engine Lab (1).jpg
05/26/2023 12:06 PM	No CBI	No PII	Photographer: Submitted by Site
Old Knock Engine Lab			48.83190555, -122.69966944
View of the floor in the lab provided to show that the waste had been cleaned up; however, the photo seems to document that the waste wasn't completely cleaned up.			



[Title]			Old Engine Lab (2).jpg
05/26/2023 12:06 PM	No CBI	No PII	Photographer: Submitted by Site
Old Knock Engine Lab			48.83192777, -122.69979722
Photo documents the removal of the waste gas samples.			



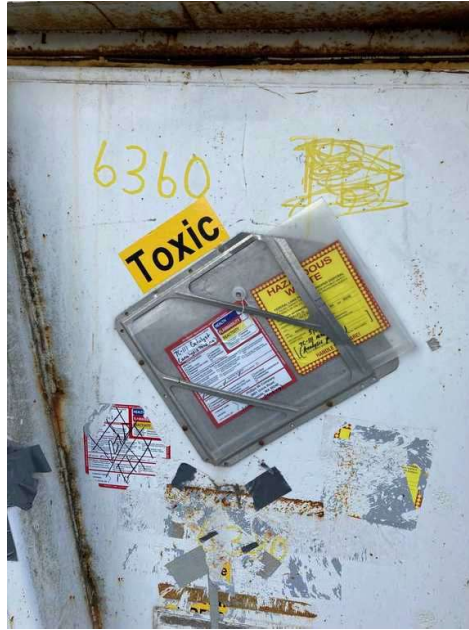
[Title]			Old Engine Lab (3).jpg
05/26/2023 12:06 PM	No CBI	No PII	Photographer: Submitted by Site
Old Knock Engine Lab			48.83191944, -122.699775
Photo submitted to show that the waste gas and floor dry was cleaned up; however, waste can still be seen on the floor of the lab.			



[Title]			Old Engine Lab (4).jpg
05/26/2023 12:06 PM	No CBI	No PII	Photographer: Submitted by Site
Old Knock Engine Lab/Area outside, behind the Old Engine Knock Lab			48.83193888, -122.69978333
Photo documents that the area was cleaned up.			



[Title]			Old Engine Lab (5).jpg
05/26/2023 12:06 PM	No CBI	No PII	Photographer: Submitted by Site
Old Knock Engine Lab/Area outside, behind the Old Engine Knock Lab			48.83194444, -122.69976111
Photo documents that the area was cleaned up.			



[Title]			7C-111 Roll Off Labeling.jpg
[Image Capture Date]	No CBI	No PII	Photographer: Submitted by Site
Refinery/Area across from the 900 Pad			[Geographic Coordinates]
View of corrective action taken by site to show the addition of an ASD and the TOXIC hazard indicator.			



[Title]			Distance Between Rows.jpg
[Image Capture Date]	No CBI	No PII	Photographer: Submitted by Site
Refinery/Permitted RCRA storage area			[Geographic Coordinates]
View of corrective action taken documenting adequate aisle spacing in the long-term permitted hazardous waste storage site.			



[Title]			Screen Box Closed.jpg
[Image Capture Date]	No CBI	No PII	Photographer: Submitted by Site
Refinery/900 pad			[Geographic Coordinates]
View of the screen box after being closed.			

APPENDIX 2: DOCUMENT LOG

Document Type	Document Name	Contains CBI	Contains PII	Uploaded By	Date Received
Other - Active waste profiles	102233WA - Sandblast Grit.pdf	No	No	Jon Jones	03/25/2024
Other - Active waste profiles	105577WA - Dewatering Basin Solids.pdf	No	No	Jon Jones	03/25/2024
Other - Active waste profiles	106150WA - Spent FCC Catalyst Fines.pdf	No	No	Jon Jones	03/25/2024
Other - Active waste profiles	107353OR - Petroleum Contaminated Soil.pdf	No	No	Jon Jones	03/25/2024
Other - Active waste profiles	134705OR - RCRA Exempt Treated Wood.pdf	No	No	Jon Jones	03/25/2024
Other - Active waste profiles	135303OR - Non-friable ACM & Petroleum Contaminated Soil.pdf	No	No	Jon Jones	03/25/2024
Other - Active waste profiles	CH52623 - NICAD Batteries.pdf	No	No	Jon Jones	03/25/2024
Other - Profile list	Active Profiles List.xlsx	No	No	Jon Jones	03/25/2024
Other - Active waste profiles	CH99217 - Consolidated COD Reagent.pdf	No	No	Jon Jones	03/25/2024
Other - Active waste profiles	CH401179 - Waste Ammonia Chemets.pdf	No	No	Jon Jones	03/25/2024
Other - Active waste profiles	CH466320 - Lead Related Material.pdf	No	No	Jon Jones	03/25/2024
Other - Active waste profiles	CH1219540 - Unused KOH Flake and briquette.pdf	No	No	Jon Jones	03/25/2024
Other - Active waste profiles	CH1945734 - Paint & Solvent Waste.pdf	No	No	Jon Jones	03/25/2024
Other - Active waste profiles	CH1945753 - Spent S-zorb Catalyst.pdf	No	No	Jon Jones	03/25/2024
Other - Active waste profiles	CH2119872 - Lead Acid Batteries.pdf	No	No	Jon Jones	03/25/2024
Other - Active waste profiles	CH2121398 - Paint & Solvent Waste and Contaminated Debris.pdf	No	No	Jon Jones	03/25/2024
Other - Active waste profiles	CH2281360 - MPR Resin.pdf	No	No	Jon Jones	03/25/2024
Other - Active waste profiles	CH2422031 - Lead Battery with No Acid.pdf	No	No	Jon Jones	03/25/2024
Other - Active waste profiles	CH2447059 - Paint, Solvent, and Oily Sludge Contaminated Debris.pdf	No	No	Jon Jones	03/25/2024
Other - Active waste profiles	CH2452013 - Unused DHT Catalyst.pdf	No	No	Jon Jones	03/25/2024

Other - Active waste profiles	CH2453488 - Unused Zeolytic Chloride Guard.pdf	No	No	Jon Jones	03/25/2024
Other - Active waste profiles	CH2453519 - Unused Fluoride Precipitator.pdf	No	No	Jon Jones	03/25/2024
Other - Active waste profiles	CH2457809 - Spectrafloc 698 Flocculant.pdf	No	No	Jon Jones	03/25/2024
Other - Active waste profiles	CH2457827 - Spectrus BD1550 Unused Tote.pdf	No	No	Jon Jones	03/25/2024
Other - Active waste profiles	CH2457834 - Spectrus NX108 Biocide.pdf	No	No	Jon Jones	03/25/2024
Other - Active waste profiles	CH2457843 - Spectrus NX1103 Microbial Control Agent.pdf	No	No	Jon Jones	03/25/2024
Other - Active waste profiles	CH2457852 - TOLAD 4695 Additive.pdf	No	No	Jon Jones	03/25/2024
Other - Active waste profiles	CH2458475 - Topguard 1191 Neutralizer.pdf	No	No	Jon Jones	03/25/2024
Other - Active waste profiles	CH2458510 - Phosphoric Acid.pdf	No	No	Jon Jones	03/25/2024
Other - Active waste profiles	CH2458521 - Rezyd-HP Z71 Solvent Surfactant.pdf	No	No	Jon Jones	03/25/2024
Other - Active waste profiles	CH2458594 - RPA-339 Corrosion Inhibitor.pdf	No	No	Jon Jones	03/25/2024
Other - Active waste profiles	CH2458612 - PL-1419 Flocculating Agent.pdf	No	No	Jon Jones	03/25/2024
Other - Active waste profiles	CH2458616 - Prochem 3F28 Antifoulant.pdf	No	No	Jon Jones	03/25/2024
Other - Active waste profiles	CH2458619 - Prochem 6A2251 Antifoam.pdf	No	No	Jon Jones	03/25/2024
Other - Active waste profiles	CH2459822 - BPR 27140 Demulsifier.pdf	No	No	Jon Jones	03/25/2024
Other - Active waste profiles	CH2459833 - BPR 45140 Antifoam.pdf	No	No	Jon Jones	03/25/2024
Other - Active waste profiles	CH2459859 - BW-8194 Corrosion Inhibitor.pdf	No	No	Jon Jones	03/25/2024
Other - Active waste profiles	CH2459861 - Prochem 3F14 Antifoulant.pdf	No	No	Jon Jones	03/25/2024
Other - Active waste profiles	CH2464052 - CESCO 70 Acidification-Citric Acid Solution.pdf	No	No	Jon Jones	03/25/2024
Other - Active waste profiles	CH2466618 - BPR 23262R1 Demulsifier.pdf	No	No	Jon Jones	03/25/2024
Other - Active waste profiles	CH2480761 - Escoweld 7505E Resin.pdf	No	No	Jon Jones	03/25/2024
Other - Active waste profiles	CU3234 - Spent Sorbant Fines.pdf	No	No	Jon Jones	03/25/2024

Inspection Date(s):

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Other - Active waste profiles	GM01-0536 - Spent Alkaline Batteries.pdf	No	No	Jon Jones	03/25/2024
Other - Active waste profiles	OR297559 - Friable Asbestos Containing Material.pdf	No	No	Jon Jones	03/25/2024
Other - Active waste profiles	OR302842 - Contaminated PPE & Debris.pdf	No	No	Jon Jones	03/25/2024
Other - Active waste profiles	OR347876 - Oily Solids_Tank Bottoms.pdf	No	No	Jon Jones	03/25/2024
Other - Active waste profiles	WATRC-2213929 - Benzene Silver Nitrate.pdf	No	No	Jon Jones	03/25/2024
Other - Active waste profiles	WATRC-2379066 - Aerosol Paint Waste.pdf	No	No	Jon Jones	03/25/2024
Other - Active waste analytical data	Dewatering Basin Results.pdf	No	No	Jon Jones	03/25/2024
Other - Active waste analytical data	DWB_Revised.pdf	No	No	Jon Jones	03/25/2024
Other - Active waste analytical data	DWB-Total Metals.pdf	No	No	Jon Jones	03/25/2024
Other - Active waste analytical data	2020-10-20_PCS-Samples_Data_10536268.pdf	No	No	Jon Jones	03/25/2024
Other - Active waste analytical data	2020-11-19_CCA_Treated_Wood_Data_10541208.pdf	No	No	Jon Jones	03/25/2024
Other - Active waste analytical data	2020-11-19_CCA-Wood_CW-400_SDS.PDF	No	No	Jon Jones	03/25/2024
Other - Active waste analytical data	2020-11-19_CCA-Wood_CW-1037_SDS.PDF	No	No	Jon Jones	03/25/2024
Other - Active waste analytical data	2020-11-19_CCA-Wood_CW-2040_SDS.PDF	No	No	Jon Jones	03/25/2024
Other - Active waste analytical data	2020-11-19_CCA-Wood_MS-310_SDS.PDF	No	No	Jon Jones	03/25/2024
Other - Active waste analytical data	2020-11-19_CCA-Wood_SDS-2006.pdf	No	No	Jon Jones	03/25/2024
Other - Active waste analytical data	2020-12-11_CCA-Treated-Wood_Data-10542354.pdf	No	No	Jon Jones	03/25/2024

Other - Active waste analytical data	2021-02-02_PCS&ACM_data (ACM).pdf	No	No	Jon Jones	03/25/2024
Other - Active waste analytical data	2021-02-02_PCS&ACM_data (PCS 4th and H).pdf	No	No	Jon Jones	03/25/2024
Other - Active waste analytical data	2021-02-02_PCS&ACM_data (PCS Dike wall crossing).pdf	No	No	Jon Jones	03/25/2024
Other - Active waste analytical data	2020-01-08_Brands-Lead-Related-Materials_Data.pdf	No	No	Jon Jones	03/25/2024
Other - Active waste analytical data	2022-05-12 Broken Lead Acid Battery.pdf	No	No	Jon Jones	03/25/2024
Other - Active waste analytical data	2021-12-20 MPR Skid Resin and Filter data.pdf	No	No	Jon Jones	03/25/2024
Other - Active waste analytical data	2021-12-20 SRU MPR Skid resin SDS MPR Services.pdf	No	No	Jon Jones	03/25/2024
Other - Active waste analytical data	Ammonia Solutions.PDF	No	No	Jon Jones	03/25/2024
Other - Active waste analytical data	BPR 23262R1.pdf	No	No	Jon Jones	03/25/2024
Other - Active waste analytical data	BPR 27140 Demulsifier .PDF	No	No	Jon Jones	03/25/2024
Other - Active waste analytical data	BPR 45140 Anti-Foam.PDF	No	No	Jon Jones	03/25/2024
Other - Active waste analytical data	CCRC_BW-8194 Corrosion Inhibitor.PDF	No	No	Jon Jones	03/25/2024
Other - Active waste analytical data	CCRC_Prochem 3F28 Antifoulant.PDF	No	No	Jon Jones	03/25/2024
Other - Active waste analytical data	CCRC_RPA-339 Corrosion Inhibitor.PDF	No	No	Jon Jones	03/25/2024
Other - Active waste analytical data	CCRC_S~1.PDF	No	No	Jon Jones	03/25/2024
Other - Active waste analytical data	CCRC_Tolad 4695 Additive - Antioxidant.PDF	No	No	Jon Jones	03/25/2024

waste analytical data					
Other - Active waste analytical data	CCRC_Topguard 1191 neutralizer.PDF	No	No	Jon Jones	03/25/2024
Other - Active waste analytical data	CESCO 70.pdf	No	No	Jon Jones	03/25/2024
Other - Active waste analytical data	ESCOWELD-7505E7530-SDS-1991419.pdf	No	No	Jon Jones	03/25/2024
Other - Active waste analytical data	Fluoride Precipitator ETI949sds.PDF	No	No	Jon Jones	03/25/2024
Other - Active waste analytical data	KF-767.PDF	No	No	Jon Jones	03/25/2024
Other - Active waste analytical data	KOH flake and briquette 2015 SDS.PDF	No	No	Jon Jones	03/25/2024
Other - Active waste analytical data	KOH Flake SDS.PDF	No	No	Jon Jones	03/25/2024
Other - Active waste analytical data	MSDS of S Zorb catalyst FCAS.pdf	No	No	Jon Jones	03/25/2024
Other - Active waste analytical data	PL-1419 Flocculating Agent .PDF	No	No	Jon Jones	03/25/2024
Other - Active waste analytical data	Prochem 3F14sds.PDF	No	No	Jon Jones	03/25/2024
Other - Active waste analytical data	Prochem 6A2251 Antifoam.PDF	No	No	Jon Jones	03/25/2024
Other - Active waste analytical data	Rezyd-HP Z71 Solvent Surfactant.PDF	No	No	Jon Jones	03/25/2024
Other - Active waste analytical data	SpectraFloc 698 Flocculant - Water Clarifier .PDF	No	No	Jon Jones	03/25/2024
Other - Active waste analytical data	Spectrus BD1550 Water Based Deposit Control Agent.PDF	No	No	Jon Jones	03/25/2024
Other - Active waste analytical data	Spectrus NX108 Biocide.PDF	No	No	Jon Jones	03/25/2024

Inspection Date(s):

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data					
Other - Active waste analytical data	Univar Phosphoric Acid sds.PDF	No	No	Jon Jones	03/25/2024
Other - Active waste analytical data	Zeolytic Chloride Guard (2).PDF	No	No	Jon Jones	03/25/2024
Other - Active waste analytical data	Zeolytic Chloride Guard.PDF	No	No	Jon Jones	03/25/2024
Other - Active waste analytical data	11-10-2022 S-ZORB FINES.pdf	No	No	Jon Jones	03/25/2024
Other - Active waste analytical data	2020-09-04_18C65_Data_10531258_frc.pdf	No	No	Jon Jones	03/25/2024
Other - Active waste analytical data	2020-10-01_SZorb_Data-Bioassay.pdf	No	No	Jon Jones	03/25/2024
Other - Active waste analytical data	2020-10-01_SZorbFines_Data.pdf	No	No	Jon Jones	03/25/2024
Other - Active waste analytical data	2020-10-01_SZorbFines_SDS-2016.pdf	No	No	Jon Jones	03/25/2024
Other - Active waste analytical data	2020-01-08_x103-Contaminated-PPE-and-Debris_Data.pdf	No	No	Jon Jones	03/25/2024
Other - Active waste analytical data	2022-04-11 Tank Bottoms (900x2) Data.pdf	No	No	Jon Jones	03/25/2024
Other - Active waste analytical data	2022-04-11 Tank Bottoms (900x2)REVISED Data w TCLP Ni.pdf	No	No	Jon Jones	03/25/2024
Other - Active waste analytical data	2022-0~3.PDF	No	No	Jon Jones	03/25/2024
Other - Active waste analytical data	Tank Bottoms (900x2) Cyanide data.pdf	No	No	Jon Jones	03/25/2024
Other - Active waste analytical data	Silver Nitrate Soln SDS 2018.pdf	No	No	Jon Jones	03/25/2024
Other - Active waste analytical data	2021-01-14_Spent_Aerosol_Contents_Data.pdf	No	No	Jon Jones	03/25/2024

Inspection Date(s):

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Other - Active waste analytical data	Ammonia CHEMets.pdf	No	No	Jon Jones	03/25/2024
Other - Active waste analytical data	COD.pdf	No	No	Jon Jones	03/25/2024
Other - Active waste analytical data	2021-11-09 Parts washer solvent and sludge data.pdf	No	No	Jon Jones	03/25/2024
Other - Active waste analytical data	2021-11-09 Parts washer solvent SDS.pdf	No	No	Jon Jones	03/25/2024
Manifests	001695620JJK.pdf	No	No	Jon Jones	03/25/2024
Manifests	001695621JJK.pdf	No	No	Jon Jones	03/25/2024
Manifests	001695622JJK.pdf	No	No	Jon Jones	03/25/2024
Manifests	001695623JJK.pdf	No	No	Jon Jones	03/25/2024
Manifests	001695624JJK.pdf	No	No	Jon Jones	03/25/2024
Manifests	001695625JJK.pdf	No	No	Jon Jones	03/25/2024
Manifests	001695626JJK (EnviroGreen).pdf	No	No	Jon Jones	03/25/2024
Manifests	001695628JJK (EnviroGreen).pdf	No	No	Jon Jones	03/25/2024
Manifests	001695629JJK (EnviroGreen).pdf	No	No	Jon Jones	03/25/2024
Manifests	001695630JJK.pdf	No	No	Jon Jones	03/25/2024
Manifests	001695631JJK.pdf	No	No	Jon Jones	03/25/2024
Manifests	001695634JJK.pdf	No	No	Jon Jones	03/25/2024
Manifests	001695636JJK.pdf	No	No	Jon Jones	03/25/2024
Manifests	001695637JJK.pdf	No	No	Jon Jones	03/25/2024
Manifests	007189234SKS.pdf	No	No	Jon Jones	03/25/2024
Manifests	007526787SKS.pdf	No	No	Jon Jones	03/25/2024
Manifests	014819233FLE.pdf	No	No	Jon Jones	03/25/2024
Manifests	014819234FLE.pdf	No	No	Jon Jones	03/25/2024
Manifests	014819235FLE.pdf	No	No	Jon Jones	03/25/2024
Manifests	014819236FLE.pdf	No	No	Jon Jones	03/25/2024
Manifests	014819237FLE.pdf	No	No	Jon Jones	03/25/2024
Manifests	015901726FLE.pdf	No	No	Jon Jones	03/25/2024
Manifests	015901727FLE.pdf	No	No	Jon Jones	03/25/2024
Manifests	015901728FLE.pdf	No	No	Jon Jones	03/25/2024
Manifests	015901729FLE.pdf	No	No	Jon Jones	03/25/2024
Manifests	015901730FLE.pdf	No	No	Jon Jones	03/25/2024
Manifests	000310826DAT.pdf	No	No	Jon Jones	03/25/2024
Manifests	001695600JJK.pdf	No	No	Jon Jones	03/25/2024
Manifests	001695601JJK.pdf	No	No	Jon Jones	03/25/2024

Manifests	001695602JJK.pdf	No	No	Jon Jones	03/25/2024
Manifests	001695603JJK.pdf	No	No	Jon Jones	03/25/2024
Manifests	001695604JJK.pdf	No	No	Jon Jones	03/25/2024
Manifests	001695605JJK.pdf	No	No	Jon Jones	03/25/2024
Manifests	001695606JJK.pdf	No	No	Jon Jones	03/25/2024
Manifests	001695607JJK With HC initial.pdf	No	No	Jon Jones	03/25/2024
Manifests	001695609JJK with HC initial.pdf	No	No	Jon Jones	03/25/2024
Manifests	001695610JJK with HC initial.pdf	No	No	Jon Jones	03/25/2024
Manifests	001695611JJK with HC initial.pdf	No	No	Jon Jones	03/25/2024
Manifests	001695612JJK.pdf	No	No	Jon Jones	03/25/2024
Manifests	001695613JJK with HC initial.pdf	No	No	Jon Jones	03/25/2024
Manifests	001695614JJK.pdf	No	No	Jon Jones	03/25/2024
Manifests	001695615JJK.pdf	No	No	Jon Jones	03/25/2024
Manifests	001695616JJK with HC initial.pdf	No	No	Jon Jones	03/25/2024
Manifests	001695617JJK with HC initial.pdf	No	No	Jon Jones	03/25/2024
Manifests	001695618JJK.pdf	No	No	Jon Jones	03/25/2024
Manifests	001695619JJK.pdf	No	No	Jon Jones	03/25/2024
Manifests	007245385SKS.pdf	No	No	Jon Jones	03/25/2024
Manifests	007711790SKS.pdf	No	No	Jon Jones	03/25/2024
Manifests	001695889JJK_Signed.pdf	No	No	Jon Jones	03/25/2024
Manifests	001695890JJK_Signed.pdf	No	No	Jon Jones	03/25/2024
Manifests	001695891JJK_Signed.pdf	No	No	Jon Jones	03/25/2024
Manifests	001695892JJK_Signed.pdf	No	No	Jon Jones	03/25/2024
Manifests	001695894JJK_Signed.pdf	No	No	Jon Jones	03/25/2024
Manifests	001695895JJK_Signed.pdf	No	No	Jon Jones	03/25/2024
Manifests	001695896JJK_Signed.pdf	No	No	Jon Jones	03/25/2024
Manifests	001695897JJK_Signed.pdf	No	No	Jon Jones	03/25/2024
Manifests	001695898JJK_Signed.pdf	No	No	Jon Jones	03/25/2024
Manifests	008614292SKS_Signed.PDF	No	No	Jon Jones	03/25/2024
Manifests	018334992FLE_Signed.pdf	No	No	Jon Jones	03/25/2024
Manifests	018334993FLE_Signed.pdf	No	No	Jon Jones	03/25/2024
Manifests	018334994FLE_Signed.pdf	No	No	Jon Jones	03/25/2024
Other - Spill logs	IMPACT 365449 AAR.doc	No	No	Jon Jones	03/25/2024
Other - Spill logs	Old Knock Engine Lab Cleanup.msg	No	No	Jon Jones	03/25/2024
Other - Spill logs	Old Knock Engine Lab Initial Notification.pdf	No	No	Jon Jones	03/25/2024
Other - Spill logs	Spill Log.xlsx	No	No	Jon Jones	03/25/2024
Personnel Training	2022 Sign in Sheet.pdf	No	No	Jon Jones	03/25/2024
Personnel Training	1904023_2019 NEW WA Dangerous Waste Labeling.pdf	No	No	Jon Jones	03/25/2024

Personnel Training	Environmental_Manual_-_07._Waste_-_HE21A0014.docx	No	No	Jon Jones	03/25/2024
Personnel Training	John Rogers DOT Hazmat.pdf	No	No	Jon Jones	03/25/2024
Personnel Training	John Rogers Hazwoper 2022.pdf	No	No	Jon Jones	03/25/2024
Other - Job Titles	Phillips 66 Ferndale Refinery Job Titles.pdf	No	No	Jon Jones	03/25/2024
Personnel Training	RCRA Facility training - Environmental.ppt	No	No	Jon Jones	03/25/2024
Personnel Training	Sumera DOT Hazmat.pdf	No	No	Jon Jones	03/25/2024
Personnel Training	Sumera McCoy RCRA 2022.pdf	No	No	Jon Jones	03/25/2024
Personnel Training	Top 10 waste violations - Ecology.pdf	No	No	Jon Jones	03/25/2024
Other - MBBR Data Tables	2020 Data Tables MBBR Out.pdf	No	No	Jon Jones	03/25/2024
Other - MBBR Data Tables	2021 Data Tables MBBR Out.pdf	No	No	Jon Jones	03/25/2024
Weekly Inspections	1-2-2023.pdf	No	No	Jon Jones	03/25/2024
Weekly Inspections	1-9-2023.pdf	No	No	Jon Jones	03/25/2024
Weekly Inspections	1-16-2023.pdf	No	No	Jon Jones	03/25/2024
Weekly Inspections	1-23-2023.pdf	No	No	Jon Jones	03/25/2024
Weekly Inspections	1-30-2023.pdf	No	No	Jon Jones	03/25/2024
Weekly Inspections	2-6-2023.pdf	No	No	Jon Jones	03/25/2024
Weekly Inspections	2-13-2023.pdf	No	No	Jon Jones	03/25/2024
Weekly Inspections	2-20-2023.pdf	No	No	Jon Jones	03/25/2024
Weekly Inspections	2-27-2023.pdf	No	No	Jon Jones	03/25/2024
Weekly Inspections	3-6-2023.pdf	No	No	Jon Jones	03/25/2024
Weekly Inspections	3-13-2023.pdf	No	No	Jon Jones	03/25/2024
Weekly Inspections	3-20-2023.pdf	No	No	Jon Jones	03/25/2024
Weekly Inspections	3-27-2023.pdf	No	No	Jon Jones	03/25/2024
Weekly Inspections	4-3-2023.pdf	No	No	Jon Jones	03/25/2024
Weekly Inspections	4-10-2023.pdf	No	No	Jon Jones	03/25/2024
Weekly Inspections	4-17-2023.pdf	No	No	Jon Jones	03/25/2024
Weekly Inspections	4-24-2023.pdf	No	No	Jon Jones	03/25/2024
Weekly Inspections	5-1-2023.pdf	No	No	Jon Jones	03/25/2024
Weekly Inspections	5-8-2023.pdf	No	No	Jon Jones	03/25/2024
Weekly Inspections	5-15-2023.pdf	No	No	Jon Jones	03/25/2024
Weekly Inspections	5.6.20.pdf	No	No	Jon Jones	03/25/2024
Weekly Inspections	5.13.20.pdf	No	No	Jon Jones	03/25/2024
Weekly Inspections	5.20.20.pdf	No	No	Jon Jones	03/25/2024
Weekly Inspections	5.26.20.pdf	No	No	Jon Jones	03/25/2024
Weekly Inspections	6.3.20.pdf	No	No	Jon Jones	03/25/2024
Weekly Inspections	6.11.20.pdf	No	No	Jon Jones	03/25/2024

Inspection Date(s):

05/16/2023 - 05/18/2023

Weekly Inspections	6.18.20.pdf	No	No	Jon Jones	03/25/2024
Weekly Inspections	6.26.20_Waste_Inspection.pdf	No	No	Jon Jones	03/25/2024
Weekly Inspections	7.2.20_Waste_Inspection.pdf	No	No	Jon Jones	03/25/2024
Weekly Inspections	7.6.20_Waste_Inspection.pdf	No	No	Jon Jones	03/25/2024
Weekly Inspections	7.13.20_Waste_Inspection.pdf	No	No	Jon Jones	03/25/2024
Weekly Inspections	7.20.20_Waste_Inspection.pdf	No	No	Jon Jones	03/25/2024
Weekly Inspections	7.27.20_Waste_Inspection.pdf	No	No	Jon Jones	03/25/2024
Weekly Inspections	8.5.20.pdf	No	No	Jon Jones	03/25/2024
Weekly Inspections	8.12.20.pdf	No	No	Jon Jones	03/25/2024
Weekly Inspections	9.2.20.pdf	No	No	Jon Jones	03/25/2024
Weekly Inspections	9.9.20.pdf	No	No	Jon Jones	03/25/2024
Weekly Inspections	9.16.20.pdf	No	No	Jon Jones	03/25/2024
Weekly Inspections	9.23.20.pdf	No	No	Jon Jones	03/25/2024
Weekly Inspections	9.29.20.pdf	No	No	Jon Jones	03/25/2024
Weekly Inspections	10.7.20.pdf	No	No	Jon Jones	03/25/2024
Weekly Inspections	10.14.20.pdf	No	No	Jon Jones	03/25/2024
Weekly Inspections	10.21.20.pdf	No	No	Jon Jones	03/25/2024
Weekly Inspections	10.28.20.pdf	No	No	Jon Jones	03/25/2024
Weekly Inspections	11.5.20.pdf	No	No	Jon Jones	03/25/2024
Weekly Inspections	11.12.20.pdf	No	No	Jon Jones	03/25/2024
Weekly Inspections	11.18.20.pdf	No	No	Jon Jones	03/25/2024
Weekly Inspections	Container_Tracking_Sheet_Update_11-18-20.pdf	No	No	Jon Jones	03/25/2024
Weekly Inspections	Container_Tracking_Sheet_Update_11-23-20.pdf	No	No	Jon Jones	03/25/2024
Weekly Inspections	Container_Tracking_Sheet_Update_12-2-20.pdf	No	No	Jon Jones	03/25/2024
Weekly Inspections	Container_Tracking_Sheet_Update_12-9-20.pdf	No	No	Jon Jones	03/25/2024
Weekly Inspections	Container_Tracking_Sheet_Update_12-16-20.pdf	No	No	Jon Jones	03/25/2024
Weekly Inspections	Container_Tracking_Sheet_Update_12-22-20.pdf	No	No	Jon Jones	03/25/2024
Weekly Inspections	1.6.21 TSD-CAA wkly inspections.pdf	No	No	Jon Jones	03/25/2024
Weekly Inspections	1.13.21 TSD-CAA wkly inspections.pdf	No	No	Jon Jones	03/25/2024
Weekly Inspections	1.20.21 TSD-CAA wkly inspections.pdf	No	No	Jon Jones	03/25/2024
Weekly Inspections	1.27.21 TSD-CAA wkly inspections.pdf	No	No	Jon Jones	03/25/2024
Weekly Inspections	2.5.21 TSD-CAA wkly inspections.pdf	No	No	Jon Jones	03/25/2024
Weekly Inspections	2.10.21 TSD-CAA wkly inspections.pdf	No	No	Jon Jones	03/25/2024
Weekly Inspections	2.17.21 TSD-CAA wkly inspections.pdf	No	No	Jon Jones	03/25/2024

Inspection Date(s):

05/16/2023 - 05/18/2023

Weekly Inspections	2.24.21 TSD-CAA wkly inspections.pdf	No	No	Jon Jones	03/25/2024
Weekly Inspections	3.3.21 TSD-CAA wkly inspections.pdf	No	No	Jon Jones	03/25/2024
Weekly Inspections	3.10.21 TSD-CAA wkly inspections.pdf	No	No	Jon Jones	03/25/2024
Weekly Inspections	3.17.21 TSD-CAA wkly inspections.pdf	No	No	Jon Jones	03/25/2024
Weekly Inspections	3.23.21 TSD-CAA wkly inspections.pdf	No	No	Jon Jones	03/25/2024
Weekly Inspections	3.30.21 TSD-CAA wkly inspections.pdf	No	No	Jon Jones	03/25/2024
Weekly Inspections	4.7.21 TSD 4.6.21 CAA wkly inspections.pdf	No	No	Jon Jones	03/25/2024
Weekly Inspections	4.14.21 TSD-CAA wkly inspections.pdf	No	No	Jon Jones	03/25/2024
Weekly Inspections	4.21.21 TSD-CAA wkly inspections.pdf	No	No	Jon Jones	03/25/2024
Weekly Inspections	4.28.21 TSD-CAA wkly inspections.pdf	No	No	Jon Jones	03/25/2024
Weekly Inspections	5.3.21 TSD-CAA wkly inspections.pdf	No	No	Jon Jones	03/25/2024
Weekly Inspections	5.12.21 TSD 5.13.21 CAA wkly inspections.pdf	No	No	Jon Jones	03/25/2024
Weekly Inspections	5.19.21 TSD-CAA wkly inspections.pdf	No	No	Jon Jones	03/25/2024
Weekly Inspections	5.24.21 TSD-CAA wkly inspections.pdf	No	No	Jon Jones	03/25/2024
Weekly Inspections	6.2.21 TSD-CAA wkly inspections.pdf	No	No	Jon Jones	03/25/2024
Weekly Inspections	6.9.21 TSD-CAA wkly inspections.pdf	No	No	Jon Jones	03/25/2024
Weekly Inspections	6.16.21 TSD-CAA wkly inspections.pdf	No	No	Jon Jones	03/25/2024
Weekly Inspections	6.22.21 TSD-CAA wkly inspections.pdf	No	No	Jon Jones	03/25/2024
Weekly Inspections	6.29.21 TSD-CAA wkly inspections.pdf	No	No	Jon Jones	03/25/2024
Weekly Inspections	7.7.21 TSD-CAA wkly inspections.pdf	No	No	Jon Jones	03/25/2024
Weekly Inspections	7.14.21 TSD-CAA wkly inspections.pdf	No	No	Jon Jones	03/25/2024
Weekly Inspections	7.20.21 TSD 7.21.21 CAA wkly inspections.pdf	No	No	Jon Jones	03/25/2024
Weekly Inspections	7.29.21 TSD 7.28.21 CAA wkly inspections.pdf	No	No	Jon Jones	03/25/2024
Weekly Inspections	8.3.21 TSD-CAA wkly inspections.pdf	No	No	Jon Jones	03/25/2024
Weekly Inspections	8.12.21 TSD-CAA wkly inspections.pdf	No	No	Jon Jones	03/25/2024
Weekly Inspections	8.18.21 TSD-CAA wkly inspections.pdf	No	No	Jon Jones	03/25/2024
Weekly Inspections	8.25.21 TSD-CAA wkly inspections.pdf	No	No	Jon Jones	03/25/2024
Weekly Inspections	8.31.21 TSD-CAA wkly inspections.pdf	No	No	Jon Jones	03/25/2024
Weekly Inspections	9.8.21 TSD 9.7.21 CAA wkly inspections.pdf	No	No	Jon Jones	03/25/2024
Weekly Inspections	9.22.21 TSD-CAA wkly inspections.pdf	No	No	Jon Jones	03/25/2024
Weekly Inspections	9.30.21 TSD-CAA wkly inspections.pdf	No	No	Jon Jones	03/25/2024
Weekly Inspections	10.5.21 TSD-CAA wkly inspections.pdf	No	No	Jon Jones	03/25/2024
Weekly Inspections	10.13.21 TSD 10.12.21 CAA wkly inspections.pdf	No	No	Jon Jones	03/25/2024
Weekly Inspections	10.19.21 TSD-CAA wkly inspections.pdf	No	No	Jon Jones	03/25/2024
Weekly Inspections	10.25.21 TSD-CAA wkly inspections.pdf	No	No	Jon Jones	03/25/2024
Weekly Inspections	11.3.21 TSD-CAA wkly inspections.pdf	No	No	Jon Jones	03/25/2024

Inspection Date(s):

05/16/2023 - 05/18/2023

Weekly Inspections	11.8.21 TSD-CAA wkly inspections.pdf	No	No	Jon Jones	03/25/2024
Weekly Inspections	11.17.21 TSD-CAA wkly inspections.pdf	No	No	Jon Jones	03/25/2024
Weekly Inspections	11.22.21 TSD-CAA wkly inspections.pdf	No	No	Jon Jones	03/25/2024
Weekly Inspections	11.29.21 TSD-CAA wkly inspections.pdf	No	No	Jon Jones	03/25/2024
Weekly Inspections	12.6.21 TSD-CAA wkly inspections.pdf	No	No	Jon Jones	03/25/2024
Weekly Inspections	12.16.21 TSD 12.13.21 CAA wkly inspections.pdf	No	No	Jon Jones	03/25/2024
Weekly Inspections	12.20.21 TSD-CAA wkly inspections.pdf	No	No	Jon Jones	03/25/2024
Weekly Inspections	12.29.21 TSD 12.28.21 CAA wkly inspections.pdf	No	No	Jon Jones	03/25/2024
Weekly Inspections	1.3.22 TSD-CAA wkly inspections.pdf	No	No	Jon Jones	03/25/2024
Weekly Inspections	1.10.22 TSD-CAA wkly inspections.pdf	No	No	Jon Jones	03/25/2024
Weekly Inspections	1.17.22 TSD 1.18.22 CAA wkly inspections.pdf	No	No	Jon Jones	03/25/2024
Weekly Inspections	1.24.22 TSD-CAA wkly inspections.pdf	No	No	Jon Jones	03/25/2024
Weekly Inspections	1.31.22 TSD-CAA wkly inspections.pdf	No	No	Jon Jones	03/25/2024
Weekly Inspections	2.7.22 TSD-CAA wkly inspections.pdf	No	No	Jon Jones	03/25/2024
Weekly Inspections	2.14.22 TSD-CAA wkly inspectioins.pdf	No	No	Jon Jones	03/25/2024
Weekly Inspections	2.22.22 TSD-CAA wkly inspections.pdf	No	No	Jon Jones	03/25/2024
Weekly Inspections	2.28.22 TSD-CAA wkly inspections.pdf	No	No	Jon Jones	03/25/2024
Weekly Inspections	3.7.22 TSD-CAA wkly inspections.pdf	No	No	Jon Jones	03/25/2024
Weekly Inspections	3.14.22 TSD-CAA wkly inspections.pdf	No	No	Jon Jones	03/25/2024
Weekly Inspections	3.22.22 TSD-CAA wkly inspections.pdf	No	No	Jon Jones	03/25/2024
Weekly Inspections	3.31.22 TSD-CAA wkly inspections.pdf	No	No	Jon Jones	03/25/2024
Weekly Inspections	4.5.22 TSD 4.4.22 CAA wkly inspections.pdf	No	No	Jon Jones	03/25/2024
Weekly Inspections	4.11.22 TSD-CAA wkly inspections.pdf	No	No	Jon Jones	03/25/2024
Weekly Inspections	4.19.22 TSD-CAA wkly inspections.pdf	No	No	Jon Jones	03/25/2024
Weekly Inspections	4.26.22 TSD 4.27.22 CAA wkly inspections.pdf	No	No	Jon Jones	03/25/2024
Weekly Inspections	5.2.22 TSD-CAA wkly inspections.pdf	No	No	Jon Jones	03/25/2024
Weekly Inspections	5.10.22 TSD 5.9.22 CAA wkly inspections.pdf	No	No	Jon Jones	03/25/2024
Weekly Inspections	5.16.22 CAA wkly inspection.pdf	No	No	Jon Jones	03/25/2024
Weekly Inspections	5.23.22 TSD 5.25.22 CAA wkly inspections.pdf	No	No	Jon Jones	03/25/2024
Weekly Inspections	6.8.22 TSD 6.6.22 CAA wkly inspections.pdf	No	No	Jon Jones	03/25/2024
Weekly Inspections	6.13.22 TSD 6.14.22 CAA wkly inspections.pdf	No	No	Jon Jones	03/25/2024
Weekly Inspections	6.21.22 TSD-CAA wkly inspections.pdf	No	No	Jon Jones	03/25/2024
Weekly Inspections	6.27.22 TSD-CAA wkly inspections.pdf	No	No	Jon Jones	03/25/2024
Weekly Inspections	7.6.22 TSD 7.5.22 CAA wkly inspections.pdf	No	No	Jon Jones	03/25/2024

Weekly Inspections	7.12.22 TSD-CAA wkly inspection.pdf	No	No	Jon Jones	03/25/2024
Weekly Inspections	7.19.22 TSD 7.22.22 CAA wkly inspections.pdf	No	No	Jon Jones	03/25/2024
Weekly Inspections	7.28.22 TSD 7.29.22 CAA wkly inspections.pdf	No	No	Jon Jones	03/25/2024
Weekly Inspections	8.1.22 TSD 8.2.22 CAA wkly inspections.pdf	No	No	Jon Jones	03/25/2024
Weekly Inspections	8.12.22 TSD-CAA wkly inspections.pdf	No	No	Jon Jones	03/25/2024
Weekly Inspections	8.17.22 TSD 8.16.22 CAA wkly inspections.pdf	No	No	Jon Jones	03/25/2024
Weekly Inspections	8.26.22 TSD-CAA wkly inspections.pdf	No	No	Jon Jones	03/25/2024
Weekly Inspections	9.1.22 TSD-CAA wkly inspections.pdf	No	No	Jon Jones	03/25/2024
Weekly Inspections	9.16.22 TSD-CAA wkly inspections.pdf	No	No	Jon Jones	03/25/2024
Weekly Inspections	9.23.22 TSD-CAA wkly inspections.pdf	No	No	Jon Jones	03/25/2024
Weekly Inspections	9.30.22 TSD-CAA wkly inspections.pdf	No	No	Jon Jones	03/25/2024
Weekly Inspections	10.7.22 TSD-CAA wkly inspections.pdf	No	No	Jon Jones	03/25/2024
Weekly Inspections	10.14.22 TSD-CAA wkly inspections.pdf	No	No	Jon Jones	03/25/2024
Weekly Inspections	10.19.22 TSD-CAA wkly inspections.pdf	No	No	Jon Jones	03/25/2024
Weekly Inspections	10.25.22 TSD-CAA wkly inspections.pdf	No	No	Jon Jones	03/25/2024
Weekly Inspections	11.1.22 TSD-CAA wkly inspections.pdf	No	No	Jon Jones	03/25/2024
Weekly Inspections	11.9.22 TSD-CAA wkly inspections.pdf	No	No	Jon Jones	03/25/2024
Weekly Inspections	11.17.22 TSD-CAA wkly inspections.pdf	No	No	Jon Jones	03/25/2024
Weekly Inspections	11.23.22 TSD-CAA wkly inspections.pdf	No	No	Jon Jones	03/25/2024
Weekly Inspections	12.1.22 TSD-CAA wkly inspections.pdf	No	No	Jon Jones	03/25/2024
Weekly Inspections	12.6.22 TSD 12.5.22 CAA wkly inspections.pdf	No	No	Jon Jones	03/25/2024
Weekly Inspections	12.12.22 TSD-CAA wkly inspections.pdf	No	No	Jon Jones	03/25/2024
Weekly Inspections	12.20.22 TSD-CAA wkly inspections.pdf	No	No	Jon Jones	03/25/2024
Weekly Inspections	12.28.22 TSD-CAA wkly inspections.pdf	No	No	Jon Jones	03/25/2024
Facility Map	General Refinery Plot Plan.pdf	No	No	Jon Jones	03/25/2024
Facility Map	Oily Water Sewer Flow Chart.pdf	No	No	Jon Jones	03/25/2024
Facility Map	P66 Stormwater Monitoring Map.pdf	No	No	Jon Jones	03/25/2024
Facility Map	SAA's Map.pdf	No	No	Jon Jones	03/25/2024
Facility Map	Updated Gen Refinery Plot Plan.pdf	No	No	Jon Jones	03/25/2024
Other - Spent Carbon	Spent Carbon reclamation docs.pdf	No	No	Jon Jones	03/25/2024
Other - Spent Carbon	ENVIRO~1.PDF	No	No	Jon Jones	03/25/2024
Other - TSD-SAA-CAA-UO locations	5.8.23 CAA wkly inspection.pdf	No	No	Jon Jones	03/25/2024
Other - TSD-SAA-CAA-UO locations	5.8.23 TSD wkly inspection.pdf	No	No	Jon Jones	03/25/2024

Inspection Date(s):

05/16/2023 - 05/18/2023

Other - TSD-SAA-CAA-UO locations	900X Tank Farm container tracking sheet.pdf	No	No	Jon Jones	03/25/2024
Other - TSD-SAA-CAA-UO locations	900X tracking sheet.pdf	No	No	Jon Jones	03/25/2024
Other - TSD-SAA-CAA-UO locations	Lab Connex.pdf	No	No	Jon Jones	03/25/2024
Other - TSD-SAA-CAA-UO locations	New Bundle Pad tracking sheet.pdf	No	No	Jon Jones	03/25/2024
Other - TSD-SAA-CAA-UO locations	P66 SAA checklist.pdf	No	No	Jon Jones	03/25/2024
Other - TSD-SAA-CAA-UO locations	PCS Stockpile inspection.pdf	No	No	Jon Jones	03/25/2024
Other - TSD-SAA-CAA-UO locations	Spent Oil Barrel Gauge List.pdf	No	No	Jon Jones	03/25/2024
Other - TSD-SAA-CAA-UO locations	TSD tracking sheet.pdf	No	No	Jon Jones	03/25/2024
Facility SOPs	Bundle Cleaning Pad Operations.pdf	No	No	Jon Jones	03/25/2024
Facility SOPs	Q1 Method 21 roll-off container monitoring.pdf	No	No	Jon Jones	03/25/2024
Facility SOPs	Q2 Method 21 roll-off container monitoring.pdf	No	No	Jon Jones	03/25/2024
Contingency Plan	Contingency Plan Quick Reference Guide.pdf	No	No	Jon Jones	03/25/2024
Other Media Program Permits	NPDES Permit WA0002984.pdf	No	No	Jon Jones	03/25/2024
Other - Hazardous Waste Storage Permit	Permit for the Storage of Dangerous Waste WAD009250366.pdf	No	No	Jon Jones	03/25/2024
Communications	P66 Ferndale Refinery EPA RCRA Inspection Response.pdf	No	No	Jon Jones	03/25/2024
Other Media Program Permits	NPDES Permit WA0002984 Fact Sheet.pdf	No	No	Jon Jones	03/25/2024
Communications	aerosol cans.msg	No	No	Jon Jones	03/25/2024
Other - Analytical Data	2020 TAB Rpt.pdf	No	No	Jon Jones	07/19/2024
Other - Analytical Data	2021 TAB Rpt.pdf	No	No	Jon Jones	07/19/2024
Other - Analytical Data	2022 TAB Rpt.pdf	No	No	Jon Jones	07/19/2024
Other - Analytical Data	Benzene sampling-MBBR Out.pdf	No	No	Jon Jones	07/19/2024
Records Review	#001695885JJK.pdf	No	No	Jon Jones	07/28/2024
Records Review	#015869054FLE, 055, 075, 076, 077, 078, 079, 080, 081, 082.pdf	No	No	Jon Jones	07/28/2024
Records Review	#015869083FLE, 084, 085, 086, 087, 088,	No	No	Jon Jones	07/28/2024

Inspection Date(s):

05/16/2023 - 05/18/2023

	089.pdf				
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