

INSPECTION REPORT

Inspection Entry Date/Time	09/10/2024 08:34 AM (AKT)	Announced: No	
Inspection Exit Date/Time	09/10/2024 05:07 PM (AKT)	Access: Granted	
Regulatory Program	RCRA		
Type of Inspection	Compliance Evaluation Inspection (CEI)		
Company Name	Northern Star (POGO), LLC		
Facility or Site Name	Northern Star (POGO), LLC		
Facility/Site Identifier	AKR000005553		
Facility/Site Physical Address	50 Mile Pogo Road		
City, State, Zip Code	Delta Junction, AK 99737		
County/Borough	Southeast Fairbanks Borough		
Generator Status	Large Quantity Generator		
NAICS	212220 - GOLD ORE AND SILVER ORE MINING		
Type of Operation	Gold Mine		
Geographic Coordinates	64.742631, -144.317123		
Mailing Address/Secondary Address	Michael Eckert meckert@nsrltd.com General Manager - POGO Operation 3204 International St. Fairbanks, AK 99701 CC: Russell Gossett, Environmental Manager rgossett@nsrltd.com		
City, State, Zip Code	Fairbanks, AK 99701		
Permit Number (If Applicable)	Not Applicable		
Lead Inspector:			
Jon Jones	Jones, Jon	Digitally signed by Jones, Jon Date: 2024.11.22 16:00:18 -09'00'	
	EPA Region 10	Jones.Jon@epa.gov	(907) 227-4316
Supervisor Review:			
Matthew Quarterman	MATTHEW QUARTERMAN	Digitally signed by MATTHEW QUARTERMAN Date: 2024.12.06 16:20:39 -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 Northern Star (POGO), LLC Facility (the “Site” or “Facility”), located at 50 Mile Pogo Road, Delta Junction, AK 99737, at 08:34 AM (AKT) on 09/10/2024 for an unannounced inspection. EPA Region 10 Lead Inspector presented credentials to and informed Russell Gossett

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 standards for hazardous waste generators and universal waste management (40 C.F.R. Parts 262 through 273) and used oil management (40 C.F.R. Part 279). The inspection was conducted as part of a Core Program requirement for FY 2024.

This report is based on information supplied by Northern Star (POGO), LLC Facility representatives, observations made by the EPA Region 10 inspector, and records and reports maintained by the facility 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 from a review of USEPA, State, and public records may be included in this report. I was accompanied during the inspection by Ms. Emily VanNortwick, ADEC, who was shadowing the inspection for training as a RCRA Inspector.

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
General Manager	Michael Eckert	(907) 895-2832	meckert@nsrltd.com	No	Yes
Senior Environmental Coordinator	Nate Kehoe		nkehoe@nsrltd.com	Yes	No
Environmental Coordinator	Kate Clancy	(907) 895-2730	kclancy@nsrltd.com	Yes	Yes
Environmental Manager	Russell Gossett	(907) 895-2831	rgossett@nsrltd.com	Yes	Yes
RCRA Inspector-in-training/ADEC	Emily VanNortwick	(907) 269-4580	emily.vannortwick@alaska.gov	Yes	Yes

Opening Conference

After arriving, we entered the facility admin building. I asked the first person I saw if they could direct us to the Environmental office. We were escorted to the Environmental office where we met Mr. Russell (Russ) Gossett, Environmental Manager. We gathered in a conference room with the facility's environmental staff. We presented our credentials and explained that we were there to conduct a hazardous waste inspection. We started the inspection with an opening conference with the following facility personnel:

- Mr. Russ Gossett, Environmental Manager
- Mr. Nate Kehoe, Senior Environmental Coordinator
- Ms. Kate Clancy, Environmental Coordinator

I asked about any changes that had taken place and Mr. Gossett said there were no significant changes since the last inspection. He then told us the 2150 Portal was shut down and converted to an exhaust portal.

Facility/Site Information

What type of generator facility verified as?	Mr. Gossett verified the facility was a Large Quantity Generator (LQG) of hazardous waste and a small quantity generator of universal waste.
What type of generator facility notified?	LQG
Size of Facility	2,400 acres
Safety Training Provided to Inspector(s)?	Yes
Operating Hours	24 hours a day, 7 days a week, 365 days a year.
Number of employees	600 employees, varies on the rotation. 200 of those are contractors.

Process Description

Northern Star (POGO), LLC is an underground gold mine and processing facility. It produces gold ingots as its primary business. The previous owner was Sumitomo Metal Mining POGO, LLC. Production at the mine started in 2006. Northern Star, LLC purchased the mine from Sumitomo and began operating at the mine on September 28, 2018.

Mine operations remain the same and a description of those processes can be found in the 2014 Sumitomo Metal Mining RCRA compliance inspection report.

Mr. Gossett verified waste streams had not changed since the 2019 inspection and also verified the same three central accumulation areas (CAAs), and the same 13 satellite accumulation areas (SAAs).

Mr. Kehoe stated waste aerosol cans are managed as universal waste prior to puncturing, the residue is managed as hazardous waste, and the punctured aerosol cans are recycled as scrap metal.

Waste streams generated at the facility include the following:

- Aerosol can residue waste
- Assay lab wastes (crucibles, cupels, and slag)
- Flammable waste with acetone
- Paint related waste
- Absorbents contaminated with paints and solvents
- Laboratory wastes
- Used batteries, spent fluorescent lamps, and waste aerosols managed as universal waste
- Used oil

Messer's Gossett and Kehoe accompanied us during the inspection, along with Ms. Kate Clancy, Environmental Coordinator. At the time of the inspection, Mr. Davis was into the third week of his second summer working at the mine. We were allowed to take photographs during the inspection and were not denied access to any part of the mine facility.

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

Only those areas in which we observed potential compliance concerns or noted other pertinent issues are discussed in this inspection report. Specifically, we inspected the following areas of the facility listed below.

Building(s)

Building/Area/Sub-area	Process Description	Area of Concern
#1875 Light Vehicle Shop		No
1875 Drill bit Connex	UWAA - aerosols.	No
Assay Lab		Yes
CAA		Yes
SAA		Yes
Flammable CAA		Yes
Mobile Equipment Maintenance (MEM)	UWAA - Waste aerosols	Yes
Yellow Flammable storage cabinet		Yes
Non-Flammable CAA		Yes
Area outside CAA		No
Old Incinerator/ Aerosol Puncturing Area	SAA	Yes
Adjacent Connex	Aerosol cans awaiting puncture	Yes
Under Ground		Yes
#1352 Shop		Yes
#1422 Electrical Shop		No
Warehouse		Yes

SECTION II – OBSERVATIONS

Building: Warehouse			
Observation #: JJ1-OB-001	Date: 09/10/2024	Contains AOC: Yes	Contains CBI: No
Person Interviewed: John Insley		Title: Warehouse Lead	
I asked Mr. Gossett if the facility provided leather gloves to mine personnel and he said they did. We were told the gloves were issued to personnel at the warehouse. We went to the warehouse, and on the way there I explained the issue with leather gloves and other leather articles that they fail TCLP analysis for chromium (D007). While observing the various types of leather gloves in stock at the warehouse, I told Mr. Gossett that his facility would need to make a waste determination on their waste leather gloves and I asked for the last three years of purchase records for leather products, including leather gloves. In a letter from Michael Eckert, General Manager, dated October 16, 2024, the following information was received: “A copy of the last three years of purchase information for leather gloves is included as Attachment			

1." Attachment 1 in the facility's response is included in the Document Log of this report under Section VII – List of Appendices.

Photo(s)

1. [IMG-202409101014341434118263.jpg](#)
2. [IMG-20240910101439143981844.jpg](#)
3. [IMG-20240910101447144764453.jpg](#)
4. [IMG-20240910101518151876350.jpg](#)
5. [IMG-20240910101541154173443.jpg](#)
6. [IMG-20240910101557155775110.jpg](#)
7. [IMG-20240910101658165871927.jpg](#)

Building: Mobile Equipment Maintenance (MEM)/Yellow Flammable storage cabinet

Observation #: JJ1-OB-002 **Date:** 09/10/2024 **Contains AOC:** Yes **Contains CBI:** No

Person Interviewed: Todd Kirtley **Title:** Maintenance Foreman

While inspecting the MEM, I opened a yellow flammable storage cabinet to see if there were any aerosol cans inside. I saw that there were some aerosol cans in the cabinet and randomly picked a few of them up to see if any were inherently waste-like. While shaking one of the aerosol cans that felt empty, I asked if it was a waste aerosol can and facility personnel indicated that it was a waste aerosol. The labeling on the aerosol can indicated that the contents were under pressure (D003 – reactive).

At the time of the inspection, the aerosol can was not packaged in a universal waste container, and it wasn't labeled or clearly marked with any of the following phrases: "Universal Waste – Aerosol," "Used Aerosol," or "Waste Aerosol." Facility personnel stated during the opening conference that waste aerosol cans are managed as universal waste prior to being punctured.

While still in the MEM, I also saw several used oil storage units that were either not labeled with the words "Used Oil," or the labeling had deteriorated to the point that it required relabeling.

There were two used oil receivers (rolling drain pans) that were not labeled with the words "Used Oil." One was not labeled at all, and the other one's labeling had deteriorated to the point that it required relabeling.

In Bay 1 there was a stationary used oil collector that was also not labeled with the words used oil. The previous labeling had deteriorated to the point that it required relabeling.

According to the Maintenance Foreman, Mr. Todd Kirtley, all used oil gets pumped to an 800-gallon used oil storage tank or a 275-gallon tote for overflow when the tank is full.

The Response Letter stated:

Photos were provided in Attachment 2 showing that the used oil storage units had been labeled with the words "Used Oil."

Attachment 2 in the facility's response is included in the Document Log of this report under Section VII – List of Appendices.

Photo(s)

1. [IMG-202409101025502550101385.jpg](#)
2. [IMG-20240910102556255692278.jpg](#)
3. [IMG-20240910102612261294407.jpg](#)
4. [IMG-202409101030243024107220.jpg](#)
5. [IMG-20240910103052305285060.jpg](#)
6. [IMG-20240910103057305788381.jpg](#)
7. [IMG-20240910103139313978989.jpg](#)
8. [IMG-20240910104351435196510.jpg](#)
9. [Labeling of Used Oil trays \(pic 3\).png](#)
10. [Labeling of Used Oil trays \(pic 1\).png](#)
11. [Labeling of Used Oil trays \(pic 2\).png](#)

Building: #1875 Light Vehicle Shop

Observation #: JJ1-OB-003 **Date:** 09/10/2024 **Contains AOC:** No **Contains CBI:** No

Person Interviewed: Jacob Daggy **Title:** Light vehicle leading hand

While inspecting the Light Vehicle Shop, I observed no areas of concern.

Photo(s)

1. [IMG-20240910105637563783272.jpg](#)
2. [IMG-20240910105641564183510.jpg](#)

Building: 1875 Drill bit Connex

Observation #: JJ1-OB-004 **Date:** 09/10/2024 **Contains AOC:** No **Contains CBI:** No

Person Interviewed: Kate Clancy **Title:** Environmental Coordinator

While inspecting the 1875 Drill bit Connex, I observed no areas of concern.

Building: Non-Flammable CAA

Observation #: JJ1-OB-005 **Date:** 09/10/2024 **Contains AOC:** Yes **Contains CBI:** No

Person Interviewed: Kate Clancy **Title:** Environmental coordinator

While inspecting the Non-Flammable CAA, I saw containers of various sizes inside the building, that were not marked or labeled and appeared as though there had been no waste determination made.

The Response Letter stated:

The SDS was used to complete a waste determination on the two drums that had (1) absorbents with Citric Acid and (2) Crystallized Citric Acid. These two drums were shipped offsite as non-hazardous waste to Chemical Waste Management of the Northwest on Wednesday, October 2, 2024.

The IBC Tote of Tritherm: A sample had been sent out for verification of waste determination and potential update of the Tritherm profile. The laboratory report was provided previously (PDF document: P-24-241-008 Tritherm). This container has been labeled and will be shipped offsite as hazardous waste by November 22,

2024. (At the time of the inspection, this IBC Tote was labeled with the words hazardous waste and marked with a hazard indicator.)

Analytical results on the two drums and the IBC tote referenced above are included in Attachment 3.

Attachment 3 in the facility's response is included in the Document Log of this report under Section VII – List of Appendices.

During the inspection, I observed 18 to 20 waste batteries on a pallet that were not labeled or clearly marked as "Universal Waste – Battery," "Waste Battery," or "Used Battery." I asked about management of those batteries; Ms. Clancy did not know how the batteries were managed. The facility's October 16, 2024 response letter stated that all batteries are managed as Universal waste while on site and then shipped to Total Reclaim - Anchorage for recycling.

Document(s)

1. 35 - PWCB Weekly Inspection 29-Aug-2024.pdf
2. 36 - PWCB Weekly Inspection 05-Sept-2024.pdf

Photo(s)

1. [IMG-2024091011265126512083095.jpg](#)
2. [IMG-2024091011265826581989697.jpg](#)
3. [IMG-202409101131023122119836.jpg](#)
4. [IMG-2024091011311631161979380.jpg](#)
5. [IMG-2024091011315631561771090.jpg](#)
6. [IMG-202409101132043241760178.jpg](#)
7. [IMG-2024091011322732271966415.jpg](#)
8. [IMG-2024091011323832381888751.jpg](#)
9. [IMG-202409101133003301906081.jpg](#)
10. [IMG-2024091011332433242056353.jpg](#)
11. [IMG-2024091011334933491831591.jpg](#)
12. [IMG-202409101135083581653766.jpg](#)
13. [IMG-2024091011362736271724999.jpg](#)
14. [IMG-2024091011364036402207289.jpg](#)
15. [IMG-202409101137083782209039.jpg](#)
16. [IMG-2024091011372537252127723.jpg](#)
17. [IMG-202409101140054051872180.jpg](#)
18. [IMG-2024091011402240221837968.jpg](#)
19. [IMG-2024091011413241322016000.jpg](#)

Building: Non-Flammable CAA/Area outside CAA

Observation #: JJ1-OB-006

Date: 09/10/2024

Contains AOC: No

Contains CBI: No

Person Interviewed: Kate Clancy

Title: Environmental coordinator

While outside of the Non-Flammable CAA, I saw multiple pallets and totes of various materials and asked if they knew whether it was good material or waste. At the time Ms. Clancy was unsure.

The Response Letter stated:

A waste determination of the material in the orange/yellow cans was completed. The orange/yellow cans are part of a ready to mix, pre-proportioned kit of grouting system, and the components of the cans are non-hazardous. The correct labels were generated and are now affixed. Please see attached SDS's (Sikadur-42-Grout-Pak Part A & Sikadur-42 Grout-Pak Part B) in Attachment 3.

Attachment 3 in the facility's response is included in the Document Log of this report under Section VII – List of Appendices.

Photo(s)

1. [IMG-2024091011524152412876631.jpg](#)
2. [IMG-202409101152595259136440.jpg](#)
3. [IMG-20240910115326532689460.jpg](#)
4. [IMG-202409101154445444128667.jpg](#)
5. [IMG-20240910115449544995703.jpg](#)

Building: Flammable CAA

Observation #: JJ1-OB-007

Date: 09/10/2024

Contains AOC: Yes

Contains CBI: No

Person Interviewed: Kate Clancy

Title: Environmental coordinator

While inspecting the Flammable CAA we saw the following:

- A 375-gallon tote labeled "Hazardous Waste-Frother-Pending Analysis," with no accumulation start date (ASD), and no hazard indicator.
- A five-gallon container of waste hydraulic fluid not labeled with the words "Used Oil."
- Multiple containers in various sizes that appeared to be inherently waste-like. There was no indication as to how long the suspected wastes had been onsite.

There was very little walking room in the CAA due to the placement of pallets and boxes of these suspected wastes.

The Response Letter stated:

The SDS was used to perform a waste determination and profile the Frother for offsite management. The material is non-hazardous. After completing the waste determination and profiling, the correct labels were generated and are now affixed. A photograph of a correct label is included as Attachment 4.

Attachment 4 in the facility's response is included in the Document Log of this report under Section VII – List of Appendices.

Document(s)

1. 35 - PFSB Weekly Inspection 29-Aug-2024.pdf
2. 36 - PFSB Weekly Inspection 05-Sept-2024.pdf

Photo(s)

1. [IMG-20240910121054105485557.jpg](#)
2. [IMG-2024091012110311370745.jpg](#)
3. [IMG-20240910121114111482783.jpg](#)
4. [IMG-20240910121124112481557.jpg](#)
5. [IMG-20240910121131113176123.jpg](#)
6. [IMG-20240910121247124774640.jpg](#)
7. [IMG-2024091012130713775965.jpg](#)
8. [IMG-20240910121312131273788.jpg](#)
9. [IMG-202409101215071571212789.jpg](#)
10. [IMG-20240910121522152248153.jpg](#)
11. [IMG-20240910121537153746348.jpg](#)
12. [IMG-20240910121543154356020.jpg](#)
13. [IMG-20240910121555155579279.jpg](#)
14. [IMG-2024091012160216282823.jpg](#)
15. [IMG-2024091012160716783050.jpg](#)
16. [IMG-20240910121621162187610.jpg](#)
17. [IMG-20240910121626162683581.jpg](#)
18. [IMG-20240910121636163686197.jpg](#)
19. [IMG-2024091012173717371321404.jpg](#)
20. [IMG-20240910121826182646719.jpg](#)
21. [IMG-20240910121840184049026.jpg](#)
22. [IMG-202409101219201920924304.jpg](#)
23. [IMG-2024091012193419341361136.jpg](#)
24. [IMG-2024091012194919491366707.jpg](#)
25. [IMG-2024091012201420141337818.jpg](#)
26. [IMG-2024091012205820581442290.jpg](#)
27. [IMG-2024091012211821181356363.jpg](#)

Building: Old Incinerator/ Aerosol Puncturing Area**Observation #:** JJ1-OB-008**Date:** 09/10/2024**Contains AOC:** Yes**Contains CBI:** No**Person Interviewed:** Kate Clancy**Title:** Environmental Coordinator

While inspecting the aerosol can puncturing area, facility personnel reiterated that the facility manages waste aerosol cans as universal waste. Ms. Clancy said waste aerosol cans are picked up weekly from the various locations throughout the mine and brought to this location for puncturing, where the can residue is managed as hazardous waste.

At the time of the inspection there were four clear garbage bags full of waste aerosol cans that were not labeled or clearly marked with any of the following phrases: "Universal Waste – Aerosols," "Waste Aerosols," or "Used Aerosols."

There were also another 22 waste aerosol cans on top of a 55-gallon container that was labeled "Universal Waste - Aerosols." These 22 loose waste aerosol cans were also not labeled or clearly marked with any of the phrases previously mentioned.

I also saw the aerosol can residue container had a lot of overspray on and around the container. I made the comment that it looked like they were having a hard time getting the waste residue into the container. I asked if the drum-top puncturing device was operating properly or if it was operator error causing the residue to spray out everywhere, but facility personnel weren't sure what was creating the problem.

The Response Letter stated:

The aerosol puncturing area has been cleaned and the drums are properly labeled. Maintenance of the puncturing device has been completed, and the operators have been trained on proper usage.

Photo(s)

1. [IMG-2024091012481848181628706.jpg](#)
2. [IMG-2024091012483848381355810.jpg](#)
3. [IMG-2024091012485948591324671.jpg](#)
4. [IMG-2024091012491049101350078.jpg](#)
5. [IMG-20240910125126512667415.jpg](#)
6. [IMG-20240910125132513279048.jpg](#)
7. [IMG-20240910125140514060416.jpg](#)

Building: Old Incinerator/ Aerosol Puncturing Area/Adjacent Connex

Observation #: JJ1-OB-009 **Date:** 09/10/2024 **Contains AOC:** Yes **Contains CBI:** No

Person Interviewed: Kate Clancy **Title:** Environmental Coordinator

At the time of the inspection, I saw multiple clear garbage bags of waste aerosol cans that were being accumulated inside of a Connex just outside of the Old Incinerator. There were approximately 45 to 50 bags of cans and according to Ms. Clancy, the bags had been accumulating in the Connex since May 2024. None of the bags were labeled or clearly marked with any of the following phrases: "Universal Waste – Aerosols," "Waste Aerosols," or "Used Aerosols."

I also saw a couple of waste aerosol cans that were falling out onto the ground from a torn open bag.

The Response Letter stated:

All aerosol bags noted during the inspection have been punctured. Incoming Aerosols Connex is completely empty as of September 25, 2024 – see Attachment 5.

Attachment 5 in the facility's response is included in the Document Log of this report under Section VII – List of Appendices.

Document(s)

1. 1 - Aerosol Can Puncturing Unit Weekly Inspection 1-January-2024.pdf
2. 2 - Aerosol Can Puncturing Unit Weekly Inspection 8-January-2024.pdf
3. 3 - Aerosol Can Puncturing Unit Weekly Inspection 20-January-2024.pdf
4. 4 - Aerosol Can Puncturing Unit Weekly Inspection 26-January-2024.pdf
5. 5 - Aerosol Can Puncturing Unit Weekly Inspection 30-January-2024.pdf
6. 6 - Aerosol Can Puncturing Unit Weekly Inspection 10-February-2024.pdf
7. 7 - Aerosol Can Puncturing Unit Weekly Inspection 13-February-2024.pdf

8. 8 - Aerosol Can Puncturing Unit Weekly Inspection 20-February-2024.pdf
9. 9 - Aerosol Can Puncturing Unit Weekly Inspection 26-February-2024.pdf
10. 10 - Aerosol Can Puncturing Unit Weekly Inspection 04-March-2024.pdf
11. 11 - Aerosol Can Puncturing Unit Weekly Inspection 11-March-2024.pdf
12. 12 - Aerosol Can Puncturing Unit Weekly Inspection 18-March-2024.pdf
13. 13 - Aerosol Can Puncturing Unit Weekly Inspection 27-March-2024.pdf
14. 14 - Aerosol Can Puncturing Unit Weekly Inspection 01-April-2024.pdf
15. 15 - Aerosol Can Puncturing Unit Weekly Inspection 08-April-2024.pdf
16. 16 - Aerosol Can Puncturing Unit Weekly Inspection 20-April-2024.pdf
17. 17 - Aerosol Can Puncturing Unit Weekly Inspection 25-April-2024.pdf
18. 17 - Aerosol Can Puncturing Unit Weekly Inspection 25-April-2024.pdf
19. 18 - Aerosol Can Puncturing Unit Weekly Inspection 29-April-2024.pdf
20. 19 - Aerosol Can Puncturing Unit Weekly Inspection 09-May-2024.pdf
21. 20 - Aerosol Can Puncturing Unit Weekly Inspection 14-May-2024.pdf
22. 21 - Aerosol Can Puncturing Unit Weekly Inspection 24-May-2024.pdf
23. 22 - Aerosol Can Puncturing Unit Weekly Inspection 01-June-2024.pdf
24. 23 - Aerosol Can Puncturing Unit Weekly Inspection 07-June-2024.pdf
25. 24 - Aerosol Can Puncturing Unit Weekly Inspection 11-June-2024.pdf
26. 25 - Aerosol Can Puncturing Unit Weekly Inspection 22-June-2024.pdf
27. 26 - Aerosol Can Puncturing Unit Weekly Inspection 29-June-2024.pdf
28. 27 - Aerosol Can Puncture Unit Weekly Inspection 04-July-2024.pdf
29. 28 - Aerosol Can Puncture Unit Weekly Inspection 12-July-2024.pdf
30. 29 - Aerosol Can Puncture Unit Weekly Inspection 20-July-2024.pdf
31. 30 - Aerosol Can Puncture Unit Weekly Inspection 27-July-2024.pdf
32. 31 - Aerosol Can Puncture Unit Weekly Inspection 03-Aug-2024.pdf
33. 32 - Aerosol Can Puncture Unit Weekly Inspection 06-Aug-2024.pdf
34. 33 - Aerosol Can Puncture Unit Weekly Inspection 16-Aug-2024.pdf
35. 34 - Aerosol Can Puncture Unit Weekly Inspection 23-Aug-2024.pdf
36. 35 - Aerosol Can Puncture Unit Weekly Inspection 29-Aug-2024.pdf
37. 36 - Aerosol Can Puncture Unit Weekly Inspection 05-Sept-2024.pdf

Photo(s)

1. [IMG-20240910125504554121933.jpg](#)
2. [IMG-202409101255105510125826.jpg](#)
3. [IMG-20240910125559555989433.jpg](#)
4. [IMG-2024091012560456498303.jpg](#)
5. [IMG-2024091012560956983804.jpg](#)

Building: Assay Lab/SAA**Observation #:** JJ1-OB-010**Date:** 09/10/2024**Contains AOC:** No**Contains CBI:** No**Person Interviewed:** Justin Lee**Title:** Lead Assayer

While inspecting the Assay Lab, I saw a container that was approximately 15-gallons in size. The container was beneath an opening in a table where the hot waste crucibles/cupels/and slag was being directed. The contents of this container are transferred to the hazardous waste crucibles/cupels/and slag tote in the Assay Lab CAA. I had Assay Lab personnel pull the container from beneath the table and we saw that it contained some waste crucibles/cupels/and slag. At the time of the inspection, the container was being utilized as a SAA container and was not closed, labeled with the words "Hazardous Waste," or marked with the hazard indicator. This was a repeat issue that was identified during the last RCRA compliance inspection in 2019.

The Response Letter stated:

The drum has been labeled and a picture of the updated label has been included as Attachment 6.

Attachment 6 in the facility's response is included in the Document Log of this report under Section VII – List of Appendices.

Photo(s)

1. [IMG-20240910135853585375694.jpg](#)
2. [IMG-2024091013590559570310.jpg](#)
3. [IMG-2024091014011611676240.jpg](#)
4. [IMG-2024091014012512571949.jpg](#)
5. [IMG-20240910141716171692532.jpg](#)
6. [IMG-20240910141722172278969.jpg](#)
7. [IMG-202409101417431743104681.jpg](#)
8. [IMG-20240910141754175497093.jpg](#)
9. [IMG-20240910142019201998205.jpg](#)
10. [IMG-20240910142031203188018.jpg](#)
11. [IMG-20240910142413241385972.jpg](#)

Building: Assay Lab/CAA

Observation #: JJ1-OB-011

Date: 09/10/2024

Contains AOC: Yes

Contains CBI: No

Person Interviewed: Justin Lee

Title: Lead Assayer

I inspected the CAA which is specifically set up outside the lab with a tote set up for the collection of hazardous Assay lab wastes (crucibles, cupels, and slag) which is characteristic for lead (D008) and arsenic (D004). At the time of the inspection, I observed no areas of concern related to the Assay lab wastes tote.

While still in this area, I observed a baghouse dust collection system adjacent to the Assay lab waste CAA being used to collect dust from the laboratory. Four 55-gallon containers were connected to the base of the baghouse. Each container was marked with a hazardous waste label that indicated each container was a SAA container. All four containers fill simultaneously with baghouse dust from the air pollution control devices and is characteristic for lead (D008) and arsenic (D004). The four 55-gallon containers are collecting the same waste and are accumulation containers and not SAA containers. Mr. Lee, Lead Assayer said the containers are changed out when they are a quarter full. At the time of the inspection, none of the four hazardous waste baghouse dust containers were marked with an ASD.

Mr. John Salzman, Environmental Coordinator sent me an email, dated 10/01/24, that included attached photos of the hazardous waste labels on each of the four 55-gallon containers of the baghouse dust waste. The photos provided in the email depicted the containers as they were labeled on the day of the inspection, SAA containers with no ASDs.

The Response Letter stated:

The Fire Assay baghouse drums are managed as 90-day storage area and the appropriate accumulations start date (ASD) has been added. The drums will be emptied at least every 90-days and re-dated with a new ASD.

Document(s)

1. 35 - Assay Lab HWAA Weekly Inspection 29-Aug-2024.pdf

2. 36 - Assay Lab HWAA Weekly Inspection 05-Sept-2024.pdf

Photo(s)

1. [IMG-20240910140352352140130.jpg](#)
2. [IMG-2024091014040040127951.jpg](#)
3. [22PGO0411 Label.JPG](#)
4. [22PGO0413 Label.JPG](#)
5. [22PGO0412 Label.JPG](#)
6. [22PGO0414 Label.JPG](#)

Building: Under Ground/#1352 Shop

Observation #: JJ1-OB-012

Date: 09/10/2024

Contains AOC: Yes

Contains CBI: No

Person Interviewed: Gary Zajanc

Title: Safety and Training Coordinator

While inspecting the shop, I saw a 55-gallon container used by the facility to accumulate waste aerosol cans. The facility manages waste aerosol cans as universal waste. At the time of the inspection, the labeling on the container was unreadable. The facility had placed a clear plastic packing envelope on the outside of the container and put a universal waste label inside; however, the clear plastic packing envelope had accumulated enough dirt and grime making the label unreadable. Therefore, the container of waste aerosol cans was not marked clearly with any of the following phrases: "Universal Waste – Aerosols," "Waste Aerosols," or "Used Aerosols."

The Response Letter stated:

The label has been cleaned and a picture of the fixed label has been included as Attachment 7.

Attachment 7 in the facility's response is included in the Document Log of this report under Section VII – List of Appendices.

Photo(s)

1. [IMG-20240910151452145296364.jpg](#)
2. [IMG-20240910151456145696387.jpg](#)
3. [IMG-2024091015150115195885.jpg](#)
4. [New UG 1352 Drum label.png](#)

Building: Under Ground/#1352 Shop

Observation #: JJ1-OB-013

Date: 09/10/2024

Contains AOC: Yes

Contains CBI: No

Person Interviewed: Gary Zajanc

Title: Safety and Training Coordinator

While still in the shop, I inspected the contents of a yellow flammable storage cabinet to see if there were any aerosol cans inside. I saw that there were some aerosol cans in the cabinet and randomly picked a few of them up to see if any were inherently waste-like. While shaking one of the aerosol cans that felt empty, I asked if it was a waste aerosol can and facility personnel indicated that it was a waste aerosol. The labeling on the aerosol can indicated that the contents were ignitable (D001) and under pressure (D003 – reactive).

At the time of the inspection, the aerosol can was not packaged in a universal waste container, and it wasn't labeled or clearly marked with any of the following phrases: "Universal Waste – Aerosol," "Used Aerosol," or

“Waste Aerosol.” Facility personnel stated during the opening conference that waste aerosol cans are managed as universal waste prior to being punctured.

Ms. Clancy placed the waste aerosol can inside of the onsite 55-gallon universal waste aerosol container during the inspection.

Photo(s)

1. [IMG-20240910154259425999122.jpg](#)
2. [IMG-20240910154314431491457.jpg](#)

SECTION III – RECORDS REVIEW

Record: Biennial Reports		AOC: No
Ref #: JJ1-RR-001	Reviewed By: Jon Jones	Reviewed Date: 09/10/2024
During the inspection, I asked the facility to provide copies of their last two Biennial Reports. The facility sent the reports to me following the inspection.		
Document(s) 1. BR-2019-AKR000005553.pdf 2. BR-2021-AKR000005553.pdf		
Record: Exception Reports		AOC: No
Ref #: JJ1-RR-002	Reviewed By: Jon Jones	Reviewed Date: 09/10/2024
At the time of the inspection, I requested copies of the exception reports for hazardous waste manifests I had identified as being received by the designated facility more than 45-days after the shipment date. The facility sent the reports to me following the inspection.		
Document(s) 1. 2020.09.11 45-Day Exception Report Letterhead.pdf 2. 2020.12.04 45-Day Exception Report Letterhead.pdf 3. 2021.02.26 45-Day Exception Report Letterhead.pdf 4. 2021.05.17 45-Day Exception Report Letterhead.pdf 5. 2021.07.16 45-Day Exception Report Letterhead.pdf 6. 2021.10.11 45-Day Exception Report Letterhead.pdf 7. 2021.11.22 45-Day Exception Report Letterhead.pdf 8. 2022.02.14 45-Day Exception Report Letterhead.pdf 9. 2022.04.15 45-Day Exception Report Letterhead.pdf 10. 2022.07.08 45-Day Exception Report Letterhead.pdf 11. 2022.08.26 45-Day Exception Report Letterhead.pdf 12. 2022.10.28 45-day Manifest Exception Report letter.pdf 13. 2023.01.10 45-Day Exception Report Letterhead.pdf 14. 2023.09.07 45-Day Exception Report Letterhead.pdf 15. 2023.11.02 45-Day Exception Report Letterhead.pdf 16. 2023.11.26 45-Day Exception Report Letterhead.pdf 17. 2023.12.29 45-Day Exception Report Letterhead.pdf 18. 2024.02.09 45-Day Exception Report Letterhead.pdf 19. 2024.02.09 45-Day Exception Report Letterhead.pdf 20. 2024.04.11 45-Day Exception Report Letterhead.pdf		

- 21. 2024.06.07 45-Day Exception Report Letterhead.pdf
- 22. 2024.07.26 45-Day Exception Report Letterhead.pdf
- 23. 2024.09.16 45-Day Exception Report Letterhead.pdf

Record: Contingency Plan Implementation reports**AOC:** Yes**Ref #:** JJ1-RR-003**Reviewed By:** Jon Jones**Reviewed Date:** 10/17/2024

I asked for a copy of the facility's hazardous waste contingency plan and quick reference guide. I reviewed the documents following the inspection and saw that there was no record, in Exhibit 5 – Plan Distribution, of a copy of the contingency plan Quick Reference Guide sent to the following agencies, as listed in the plan:

- Alaska State Troopers Post - Delta Junction
- EMS Service Ambulance - Delta Junction
- Fairbanks Memorial Hospital-Emergency Department
- US Ecology Fairbanks (USE)

SECTION IV – AREA OF CONCERN

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

Building: Warehouse	Area:	Sub-area:
JJ1-OB-001		
Failure to make a hazardous waste determination at the point of generation for waste leather gloves.	Regulation:	Sections:
Building: Mobile Equipment Maintenance (MEM)	Area: Yellow Flammable storage cabinet	Sub-area:
JJ1-OB-002		
A waste aerosol can was not packaged in a universal waste container or either labeled or clearly marked with any of the following phrases: "Universal Waste – Aerosol," "Used Aerosol," or "Waste Aerosol."	Regulation:	Sections:
Building: Mobile Equipment Maintenance (MEM)	Area: Shop	Sub-area:
JJ1-OB-002		
Three used oil storage units were not labeled with the words "Used Oil."	Regulation:	Sections:
Building: Non-Flammable CAA	Area:	Sub-area:
JJ1-OB-005		

Failure to make a hazardous waste determination at the point of generation.	Regulation:	Sections:
Building: Flammable CAA	Area:	Sub-area:
JJ1-OB-007		
A five-gallon container of waste hydraulic fluid not labeled with the words "Used Oil." Failure to make a hazardous waste determination at the point of generation for multiple containers in various sizes that appeared to be inherently waste-like. There was no indication as to how long the suspected wastes had been onsite.	Regulation:	Sections:
Building: Old Incinerator/ Aerosol Puncturing Area	Area:	Sub-area:
JJ1-OB-008		
At the time of the inspection there were four bags of waste aerosol cans and another 22 loose waste aerosols on top of a container that were not labeled or clearly marked with any of the following phrases: "Universal Waste – Aerosol," "Used Aerosol," or "Waste Aerosol." Failure to maintain and operate with regard to a SAA container being used to accumulate waste aerosol can residue. There was a significant amount of aerosol can residue that had been released in and around the area where the aerosol can were punctured.	Regulation:	Sections:
Building: Old Incinerator/ Aerosol Puncturing Area	Area: Adjacent Connex	Sub-area:
JJ1-OB-009		
There were approximately 45 to 50 bags of waste aerosol cans that were not labeled or clearly marked with any of the following phrases: "Universal Waste – Aerosols,"	Regulation:	Sections:

"Waste Aerosols," or "Used Aerosols."		
Building: Assay Lab	Area: SAA	Sub-area:
JJ1-OB-010		
A 15-gallon SAA container of Assay lab wastes and was not closed, labeled with the words "Hazardous Waste," or marked with the hazard indicator. This was a repeat issue identified during the last RCRA compliance inspection in 2019.	Regulation:	Sections:
Building: Assay Lab	Area: CAA/Baghouse	Sub-area:
JJ1-OB-011		
There were four, 55-gallon containers of hazardous waste baghouse dust connected to the base of the baghouse, all were labeled "Hazardous Waste" and simultaneously collecting dust. These four containers were not marked with ASDs and labeled as SAA containers.	Regulation:	Sections:
Building: Under Ground	Area: #1352 Shop	Sub-area:
JJ1-OB-012		
A 55-gallon waste aerosol collection container was not labeled or clearly marked with any of the following phrases: "Universal Waste – Aerosol," "Used Aerosol," or "Waste Aerosol." The facility stated in their response letter, the label has been cleaned and a picture of the fixed label was included in their response.	Regulation:	Sections:
Building: Under Ground	Area: #1352 Shop	Sub-area:
JJ1-OB-013		
A waste aerosol can was not packaged in a universal waste container or either labeled or clearly marked with any of the following phrases: "Universal Waste –	Regulation:	Sections:

Aerosol,” “Used Aerosol,” or “Waste Aerosol.”		
Ms. Clancy placed the waste aerosol can inside of the onsite 55-gallon universal waste aerosol container during the inspection.		

Record: Contingency Plan Implementation reports**JJ1-RR-003**

No record, in Contingency Plan Exhibit 5 – Plan Distribution, of a copy of the contingency plan Quick Reference Guide sent to the following agencies, as listed in the plan: • Alaska State Troopers Post - Delta Junction • EMS Service Ambulance - Delta Junction • US Ecology Fairbanks (USE) • Fairbanks Memorial Hospital- Emergency Department	Regulation:	Sections:
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SECTION V – CLOSING CONFERENCE AND FOLLOW UP**Closing Conference**

At the conclusion of the inspection, I conducted a closing conference that was attended by those listed in the Attendees table, in Section I of this report. I thanked them 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 my inspection of the facility. I then explained the follow-up process that would take place once I finished the report. I explained they would receive a copy of the report as would a case officer. I told them the case officer would review the report to determine if any of my areas of concern documented violations.

Follow Up

Following the inspection, I sent a request to the facility for documents that I was not able to review during the inspection. The requested documents included weekly hazardous waste inspection logs, contingency plan, training records, and exception reports.

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-202409101014341434118263.jpg
09/10/2024 10:14 AM (AKT)	No CBI	No PII	Photographer: Jon Jones
Warehouse			64.45365462, -144.90493454
View of leather gloves in stock for issue at the facility.			



[Title]			IMG-20240910101439143981844.jpg
09/10/2024 10:14 AM (AKT)	No CBI	No PII	Photographer: Jon Jones
Warehouse			64.45365462, -144.90493454
View of leather gloves in stock for issue at the facility.			



[Title]			IMG-20240910101447144764453.jpg
09/10/2024 10:14 AM (AKT)	No CBI	No PII	Photographer: Jon Jones
Warehouse			64.45365462, -144.90493454
Close-up view of leather gloves in stock for issue at the facility.			



[Title]			IMG-20240910101518151876350.jpg
09/10/2024 10:15 AM (AKT)	No CBI	No PII	Photographer: Jon Jones
Warehouse			64.45365462, -144.90493454
Close-up view of leather gloves in stock for issue at the facility.			



[Title]			IMG-20240910101541154173443.jpg
09/10/2024 10:15 AM (AKT)	No CBI	No PII	Photographer: Jon Jones
Warehouse			64.45365462, -144.90493454
Close-up view of leather gloves in stock for issue at the facility.			



[Title]			IMG-20240910101557155775110.jpg
09/10/2024 10:15 AM (AKT)	No CBI	No PII	Photographer: Jon Jones
Warehouse			64.45365462, -144.90493454
Close-up view of leather gloves in stock for issue at the facility.			



[Title]			IMG-20240910101658165871927.jpg
09/10/2024 10:16 AM (AKT)	No CBI	No PII	Photographer: Jon Jones
Warehouse			64.45365462, -144.90493454
Close-up view of leather gloves in stock for issue at the facility.			



[Title]			IMG-202409101025502550101385.jpg
09/10/2024 10:25 AM (AKT)	No CBI	No PII	Photographer: Jon Jones
Mobile Equipment Maintenance (MEM)/Yellow Flammable storage cabinet			64.45365462, -144.90493454
View of the contents inside storage cabinet.			



[Title]			IMG-20240910102556255692278.jpg
09/10/2024 10:25 AM (AKT)	No CBI	No PII	Photographer: Jon Jones
Mobile Equipment Maintenance (MEM)/Yellow Flammable storage cabinet			64.45365462, -144.90493454
View of waste aerosol can in storage cabinet.			



[Title]			IMG-20240910102612261294407.jpg
09/10/2024 10:26 AM (AKT)	No CBI	No PII	Photographer: Jon Jones
Mobile Equipment Maintenance (MEM)/Yellow Flammable storage cabinet			64.45365462, -144.90493454
Another view of waste aerosol can in storage cabinet.			



[Title]			IMG-202409101030243024107220.jpg
09/10/2024 10:30 AM (AKT)	No CBI	No PII	Photographer: Jon Jones
Mobile Equipment Maintenance (MEM)/Yellow Flammable storage cabinet			64.45365462, -144.90493454
View of a used oil receiver that is not labeled with the words "Used Oil."			



[Title]			IMG-20240910103052305285060.jpg
09/10/2024 10:30 AM (AKT)	No CBI	No PII	Photographer: Jon Jones
Mobile Equipment Maintenance (MEM)/Yellow Flammable storage cabinet			64.45362822, -144.90491903
View of another used oil receiver, seen here beneath a raised platform, that is not labeled with the words "Used Oil."			



[Title]			IMG-20240910103057305788381.jpg
09/10/2024 10:30 AM (AKT)	No CBI	No PII	Photographer: Jon Jones
Mobile Equipment Maintenance (MEM)/Yellow Flammable storage cabinet			64.45362822, -144.90491903
Another view of the same used oil receiver, seen here beneath the platform, that is not labeled with the words "Used Oil."			



[Title]			IMG-20240910103139313978989.jpg
09/10/2024 10:31 AM (AKT)	No CBI	No PII	Photographer: Jon Jones
Mobile Equipment Maintenance (MEM)/Yellow Flammable storage cabinet			64.45362822, -144.90491903
Another view of the same used oil receiver, seen here beneath the platform, that is not labeled with the words "Used Oil."			



[Title]			IMG-20240910104351435196510.jpg
09/10/2024 10:43 AM (AKT)	No CBI	No PII	Photographer: Jon Jones
Mobile Equipment Maintenance (MEM)/Yellow Flammable storage cabinet			64.45362822, -144.90491903
View of used oil collector with deteriorated labeling that requires relabeling with the words used oil.			



[Title]			IMG-20240910105637563783272.jpg
09/10/2024 10:56 AM (AKT)	No CBI	No PII	Photographer: Jon Jones
#1875 Light Vehicle Shop			64.45362822, -144.90491903
View of container of used antifreeze.			



[Title]			IMG-20240910105641564183510.jpg
09/10/2024 10:56 AM (AKT)	No CBI	No PII	Photographer: Jon Jones
#1875 Light Vehicle Shop			64.45362822, -144.90491903
Close-up view of container of used antifreeze.			



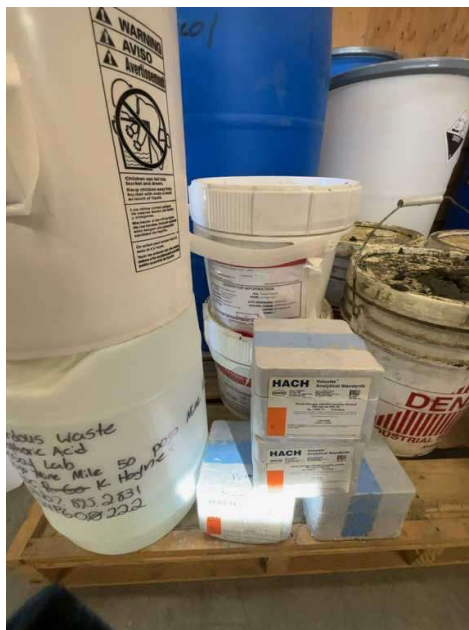
[Title]			IMG-2024091011265126512083095.jpg
09/10/2024 11:26 AM (AKT)	No CBI	No PII	Photographer: Jon Jones
Non-Flammable CAA			[Geographic Coordinates]
Waste batteries that are managed as universal waste, but seen here unlabeled.			



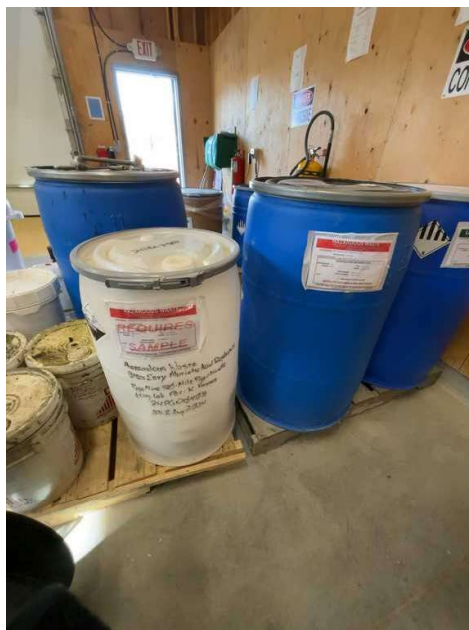
[Title]			IMG-2024091011265826581989697.jpg
09/10/2024 11:26 AM (AKT)	No CBI	No PII	Photographer: Jon Jones
Non-Flammable CAA			[Geographic Coordinates]
Another view of unlabeled universal waste batteries.			



[Title]			IMG-202409101131023122119836.jpg
09/10/2024 11:31 AM (AKT)	No CBI	No PII	Photographer: Jon Jones
Non-Flammable CAA			64.45362822, -144.90491903
View of waste containers in the CAA.			



[Title]			IMG-2024091011311631161979380.jpg
09/10/2024 11:31 AM (AKT)	No CBI	No PII	Photographer: Jon Jones
Non-Flammable CAA			64.45362822, -144.90491903
View of waste containers in the CAA. Seen here are a few containers that are not labeled and appear to need a waste determination.			



[Title]			IMG-2024091011315631561771090.jpg
09/10/2024 11:31 AM (AKT)	No CBI	No PII	Photographer: Jon Jones
Non-Flammable CAA			64.45362822, -144.90491903
View of waste containers in the CAA.			



[Title]			IMG-202409101132043241760178.jpg
09/10/2024 11:32 AM (AKT)	No CBI	No PII	Photographer: Jon Jones
Non-Flammable CAA			64.45362822, -144.90491903
View of waste containers in the CAA.			



[Title]			IMG-2024091011322732271966415.jpg
09/10/2024 11:32 AM (AKT)	No CBI	No PII	Photographer: Jon Jones
Non-Flammable CAA			64.45362822, -144.90491903
View of waste containers in the CAA.			



[Title]			IMG-2024091011323832381888751.jpg
09/10/2024 11:32 AM (AKT)	No CBI	No PII	Photographer: Jon Jones
Non-Flammable CAA			64.45362822, -144.90491903
View of waste containers in the CAA.			



[Title]			IMG-202409101133003301906081.jpg
09/10/2024 11:33 AM (AKT)	No CBI	No PII	Photographer: Jon Jones
Non-Flammable CAA			64.45362822, -144.90491903
View of waste containers in the CAA.			



[Title]			IMG-2024091011332433242056353.jpg
09/10/2024 11:33 AM (AKT)	No CBI	No PII	Photographer: Jon Jones
Non-Flammable CAA			64.45362822, -144.90491903
View of waste containers in the CAA.			



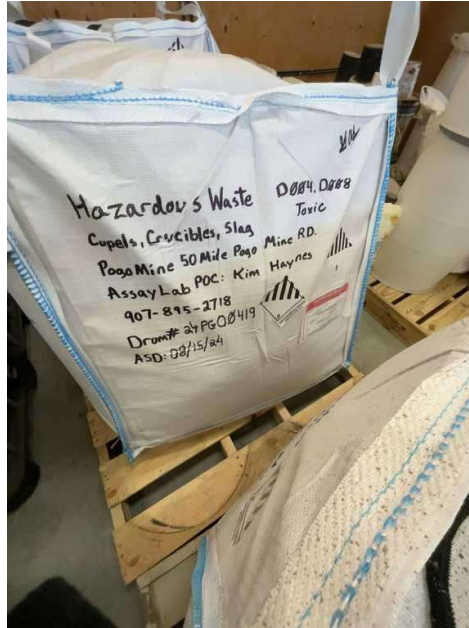
[Title]			IMG-2024091011334933491831591.jpg
09/10/2024 11:33 AM (AKT)	No CBI	No PII	Photographer: Jon Jones
Non-Flammable CAA			64.45362822, -144.90491903
View of waste containers in the CAA.			



[Title]			IMG-202409101135083581653766.jpg
09/10/2024 11:35 AM (AKT)	No CBI	No PII	Photographer: Jon Jones
Non-Flammable CAA			64.45362822, -144.90491903
View of waste containers in the CAA.			



[Title]			IMG-2024091011362736271724999.jpg
09/10/2024 11:36 AM (AKT)	No CBI	No PII	Photographer: Jon Jones
Non-Flammable CAA			64.45362822, -144.90491903
View of waste containers in the CAA.			



[Title]			IMG-2024091011364036402207289.jpg
09/10/2024 11:36 AM (AKT)	No CBI	No PII	Photographer: Jon Jones
Non-Flammable CAA			64.45362822, -144.90491903
View of waste containers in the CAA.			



[Title]			IMG-202409101137083782209039.jpg
09/10/2024 11:37 AM (AKT)	No CBI	No PII	Photographer: Jon Jones
Non-Flammable CAA			64.45362822, -144.90491903
View of waste containers in the CAA.			



[Title]			IMG-2024091011372537252127723.jpg
09/10/2024 11:37 AM (AKT)	No CBI	No PII	Photographer: Jon Jones
Non-Flammable CAA			64.45362822, -144.90491903
View of waste containers in the CAA.			



[Title]			IMG-202409101140054051872180.jpg
09/10/2024 11:40 AM (AKT)	No CBI	No PII	Photographer: Jon Jones
Non-Flammable CAA			[Geographic Coordinates]
View of suspect wastes that the facility may have failed to make a hazardous waste determination at the point of generation.			



[Title]			IMG-2024091011402240221837968.jpg
09/10/2024 11:40 AM (AKT)	No CBI	No PII	Photographer: Jon Jones
Non-Flammable CAA			64.45362822, -144.90491903
Another view of the same suspect wastes that the facility may have failed to make a hazardous waste determination at the point of generation.			



[Title]			IMG-2024091011413241322016000.jpg
09/10/2024 11:41 AM (AKT)	No CBI	No PII	Photographer: Jon Jones
Non-Flammable CAA			64.45362822, -144.90491903
View of additional suspect wastes that the facility may have failed to make a hazardous waste determination at the point of generation.			



[Title]			IMG-2024091011524152412876631.jpg
09/10/2024 11:52 AM (AKT)	No CBI	No PII	Photographer: Jon Jones
Non-Flammable CAA/Area outside CAA			64.45362822, -144.90491903
View of suspected wastes outside of the CAA.			



[Title]			IMG-202409101152595259136440.jpg
09/10/2024 11:52 AM (AKT)	No CBI	No PII	Photographer: Jon Jones
Non-Flammable CAA/Area outside CAA			64.45362822, -144.90491903
View of suspected wastes outside of the CAA.			



[Title]			IMG-20240910115326532689460.jpg
09/10/2024 11:53 AM (AKT)	No CBI	No PII	Photographer: Jon Jones
Non-Flammable CAA/Area outside CAA			64.45362822, -144.90491903
View of suspected wastes outside of the CAA.			



[Title]			IMG-202409101154445444128667.jpg
09/10/2024 11:54 AM (AKT)	No CBI	No PII	Photographer: Jon Jones
Non-Flammable CAA/Area outside CAA			64.45362822, -144.90491903
View of suspected wastes outside of the CAA.			



[Title]			IMG-20240910115449544995703.jpg
09/10/2024 11:54 AM (AKT)	No CBI	No PII	Photographer: Jon Jones
Non-Flammable CAA/Area outside CAA			64.45362822, -144.90491903
View of suspected wastes outside of the CAA.			



[Title]			IMG-20240910121054105485557.jpg
09/10/2024 12:10 PM (AKT)	No CBI	No PII	Photographer: Jon Jones
Flammable CAA			64.45362822, -144.90491903
View of 375-gallon tote labeled as Hazardous Waste pending analysis, with no ASD, or hazard indicator.			



[Title]			IMG-2024091012110311370745.jpg
09/10/2024 12:11 PM (AKT)	No CBI	No PII	Photographer: Jon Jones
Flammable CAA			64.45362822, -144.90491903
Close-up view of the label on the 375-gallon tote labeled as Hazardous Waste pending analysis, with no ASD, or hazard indicator.			



[Title]			IMG-20240910121114111482783.jpg
09/10/2024 12:11 PM (AKT)	No CBI	No PII	Photographer: Jon Jones
Flammable CAA			64.45362822, -144.90491903
Another view of the 375-gallon tote.			



[Title]			IMG-20240910121124112481557.jpg
09/10/2024 12:11 PM (AKT)	No CBI	No PII	Photographer: Jon Jones
Flammable CAA			64.45362822, -144.90491903
Another view of the labeling on the 375-gallon tote.			



[Title]			IMG-20240910121131113176123.jpg
09/10/2024 12:11 PM (AKT)	No CBI	No PII	Photographer: Jon Jones
Flammable CAA			64.45362822, -144.90491903
Another close-up view of the labeling.			



[Title]			IMG-20240910121247124774640.jpg
09/10/2024 12:12 PM (AKT)	No CBI	No PII	Photographer: Jon Jones
Flammable CAA			64.45362822, -144.90491903
A five-gallon, yellow container of waste hydraulic fluid not labeled with the words "Used Oil."			



[Title]			IMG-2024091012130713775965.jpg
09/10/2024 12:13 PM (AKT)	No CBI	No PII	Photographer: Jon Jones
Flammable CAA			64.45362822, -144.90491903
View of the labeling on the container lid of waste hydraulic fluid.			



[Title]			IMG-20240910121312131273788.jpg
09/10/2024 12:13 PM (AKT)	No CBI	No PII	Photographer: Jon Jones
Flammable CAA			64.45362822, -144.90491903
Another view of the five-gallon, yellow container of waste hydraulic fluid not labeled with the words "Used Oil."			



[Title]			IMG-202409101215071571212789.jpg
09/10/2024 12:15 PM (AKT)	No CBI	No PII	Photographer: Jon Jones
Flammable CAA			64.45362822, -144.90491903
View of various containers all over the floor of the CAA that look like they require a hazardous waste determination.			



[Title]			IMG-20240910121522152248153.jpg
09/10/2024 12:15 PM (AKT)	No CBI	No PII	Photographer: Jon Jones
Flammable CAA			64.45362822, -144.90491903
Another view of various containers all over the floor of the CAA that look like they require a hazardous waste determination.			



[Title]			IMG-20240910121537153746348.jpg
09/10/2024 12:15 PM (AKT)	No CBI	No PII	Photographer: Jon Jones
Flammable CAA			64.45362822, -144.90491903
Another view of various containers all over the floor of the CAA that look like they require a hazardous waste determination.			



[Title]			IMG-20240910121543154356020.jpg
09/10/2024 12:15 PM (AKT)	No CBI	No PII	Photographer: Jon Jones
Flammable CAA			64.45362822, -144.90491903
Another view of various containers all over the floor of the CAA that look like they require a hazardous waste determination.			



[Title]			IMG-20240910121555155579279.jpg
09/10/2024 12:15 PM (AKT)	No CBI	No PII	Photographer: Jon Jones
Flammable CAA			64.45362822, -144.90491903
Another view of various containers all over the floor of the CAA that look like they require a hazardous waste determination.			



[Title]			IMG-2024091012160216282823.jpg
09/10/2024 12:16 PM (AKT)	No CBI	No PII	Photographer: Jon Jones
Flammable CAA			64.45362822, -144.90491903
Another view of various containers all over the floor of the CAA that look like they require a hazardous waste determination.			



[Title]			IMG-2024091012160716783050.jpg
09/10/2024 12:16 PM (AKT)	No CBI	No PII	Photographer: Jon Jones
Flammable CAA			64.45362822, -144.90491903
Another view of various containers all over the floor of the CAA that look like they require a hazardous waste determination.			



[Title]			IMG-20240910121621162187610.jpg
09/10/2024 12:16 PM (AKT)	No CBI	No PII	Photographer: Jon Jones
Flammable CAA			64.45362822, -144.90491903
Another view of various containers all over the floor of the CAA that look like they require a hazardous waste determination.			



[Title]			IMG-20240910121626162683581.jpg
09/10/2024 12:16 PM (AKT)	No CBI	No PII	Photographer: Jon Jones
Flammable CAA			64.45362822, -144.90491903
Another view of various containers all over the floor of the CAA that look like they require a hazardous waste determination.			



[Title]			IMG-20240910121636163686197.jpg
09/10/2024 12:16 PM (AKT)	No CBI	No PII	Photographer: Jon Jones
Flammable CAA			64.45362822, -144.90491903
Another view of various containers all over the floor of the CAA that look like they require a hazardous waste determination.			



[Title]			IMG-2024091012173717371321404.jpg
09/10/2024 12:17 PM (AKT)	No CBI	No PII	Photographer: Jon Jones
Flammable CAA			64.44731652, -144.93653314
Another view of various containers all over the floor of the CAA that look like they require a hazardous waste determination.			



[Title]			IMG-20240910121826182646719.jpg
09/10/2024 12:18 PM (AKT)	No CBI	No PII	Photographer: Jon Jones
Flammable CAA			64.44727549, -144.93801673
A view of a 55-gallon container in the CAA that requires a hazardous waste determination.			



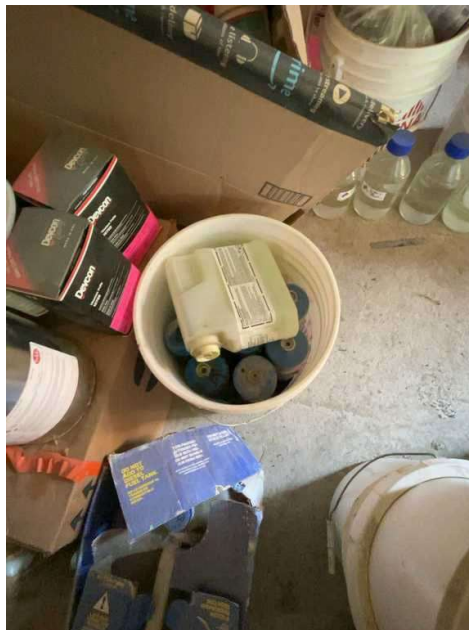
[Title]			IMG-20240910121840184049026.jpg
09/10/2024 12:18 PM (AKT)	No CBI	No PII	Photographer: Jon Jones
Flammable CAA			64.44727549, -144.93801673
Another 55-gallon container in the CAA that requires a hazardous waste determination.			



[Title]			IMG-202409101219201920924304.jpg
09/10/2024 12:19 PM (AKT)	No CBI	No PII	Photographer: Jon Jones
Flammable CAA			64.44727549, -144.93801673
View of waste aerosol can of bear spray.			



[Title]			IMG-2024091012193419341361136.jpg
09/10/2024 12:19 PM (AKT)	No CBI	No PII	Photographer: Jon Jones
Flammable CAA			64.44727549, -144.93801673
Another view of various containers all over the floor of the CAA that look like they require a hazardous waste determination.			



[Title]			IMG-2024091012194919491366707.jpg
09/10/2024 12:19 PM (AKT)	No CBI	No PII	Photographer: Jon Jones
Flammable CAA			64.44727549, -144.93801673
Another view of various containers all over the floor of the CAA that look like they require a hazardous waste determination.			



[Title]			IMG-2024091012201420141337818.jpg
09/10/2024 12:20 PM (AKT)	No CBI	No PII	Photographer: Jon Jones
Flammable CAA			64.44727549, -144.93801673
Another view of various containers all over the floor of the CAA that look like they require a hazardous waste determination.			



[Title]			IMG-2024091012205820581442290.jpg
09/10/2024 12:20 PM (AKT)	No CBI	No PII	Photographer: Jon Jones
Flammable CAA			64.44727549, -144.93801673
Another view of various containers all over the floor of the CAA that look like they require a hazardous waste determination.			



[Title]			IMG-2024091012211821181356363.jpg
09/10/2024 12:21 PM (AKT)	No CBI	No PII	Photographer: Jon Jones
Flammable CAA			64.44727549, -144.93801673
Another view of various containers all over the floor of the CAA that look like they require a hazardous waste determination.			



[Title]			IMG-2024091012481848181628706.jpg
09/10/2024 12:48 PM (AKT)	No CBI	No PII	Photographer: Jon Jones
Old Incinerator/ Aerosol Puncturing Area			64.45362822, -144.90491903
View of 22 waste aerosol cans on top of a universal waste container, seen here not labeled.			



[Title]			IMG-2024091012483848381355810.jpg
09/10/2024 12:48 PM (AKT)	No CBI	No PII	Photographer: Jon Jones
Old Incinerator/ Aerosol Puncturing Area			64.45362822, -144.90491903
View of a bag of waste aerosol cans that is not labeled.			



[Title]			IMG-2024091012485948591324671.jpg
09/10/2024 12:48 PM (AKT)	No CBI	No PII	Photographer: Jon Jones
Old Incinerator/ Aerosol Puncturing Area			64.45362822, -144.90491903
Another view of the same bag of waste aerosol cans seen in the previous photo.			



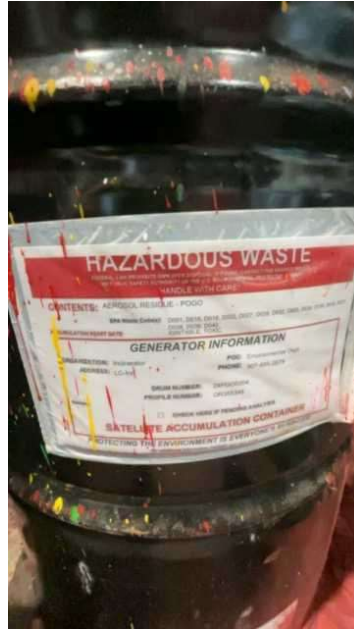
[Title]			IMG-2024091012491049101350078.jpg
09/10/2024 12:49 PM (AKT)	No CBI	No PII	Photographer: Jon Jones
Old Incinerator/ Aerosol Puncturing Area			64.45362822, -144.90491903
A view of two additional bags of unlabeled waste aerosol cans.			



[Title]			IMG-20240910125126512667415.jpg
09/10/2024 12:51 PM (AKT)	No CBI	No PII	Photographer: Jon Jones
Old Incinerator/ Aerosol Puncturing Area			64.45362822, -144.90491903
View of hazardous waste SAA container of aerosol can residue from can puncturing, seen here with splattering and overspray of aerosol can contents all over the SAA.			



[Title]			IMG-20240910125132513279048.jpg
09/10/2024 12:51 PM (AKT)	No CBI	No PII	Photographer: Jon Jones
Old Incinerator/ Aerosol Puncturing Area			64.45362822, -144.90491903
Close-up view of the SAA container with splattering and overspray of aerosol can contents all over the SAA.			



[Title]			IMG-20240910125140514060416.jpg
09/10/2024 12:51 PM (AKT)	No CBI	No PII	Photographer: Jon Jones
Old Incinerator/ Aerosol Puncturing Area			64.45362822, -144.90491903
Close-up view of the labeling on the SAA container of waste residue.			



[Title]			IMG-20240910125504554121933.jpg
09/10/2024 12:55 PM (AKT)	No CBI	No PII	Photographer: Jon Jones
Old Incinerator/ Aerosol Puncturing Area/Adjacent Connex			64.45362822, -144.90491903
View of 45 to 50 bags of waste aerosols not labeled or clearly marked with any of the following phrases: "Universal Waste – Aerosols," "Waste Aerosols," or "Used Aerosols."			



[Title]			IMG-202409101255105510125826.jpg
09/10/2024 12:55 PM (AKT)	No CBI	No PII	Photographer: Jon Jones
Old Incinerator/ Aerosol Puncturing Area/Adjacent Connex			64.45362822, -144.90491903
Close-up view showing waste aerosol cans coming out of the bags.			



[Title]			IMG-20240910125559555989433.jpg
09/10/2024 12:55 PM (AKT)	No CBI	No PII	Photographer: Jon Jones
Old Incinerator/ Aerosol Puncturing Area/Adjacent Connex			64.45362822, -144.90491903
Another view of 45 to 50 bags of waste aerosols not labeled or clearly marked with any of the following phrases: "Universal Waste – Aerosols," "Waste Aerosols," or "Used Aerosols."			



[Title]			IMG-2024091012560456498303.jpg
09/10/2024 12:56 PM (AKT)	No CBI	No PII	Photographer: Jon Jones
Old Incinerator/ Aerosol Puncturing Area/Adjacent Connex			64.45362822, -144.90491903
Another view of 45 to 50 bags of waste aerosols not labeled or clearly marked with any of the following phrases: "Universal Waste – Aerosols," "Waste Aerosols," or "Used Aerosols."			



[Title]			IMG-2024091012560956983804.jpg
09/10/2024 12:56 PM (AKT)	No CBI	No PII	Photographer: Jon Jones
Old Incinerator/ Aerosol Puncturing Area/Adjacent Connex			64.45362822, -144.90491903
Another view of 45 to 50 bags of waste aerosols not labeled or clearly marked with any of the following phrases: "Universal Waste – Aerosols," "Waste Aerosols," or "Used Aerosols."			



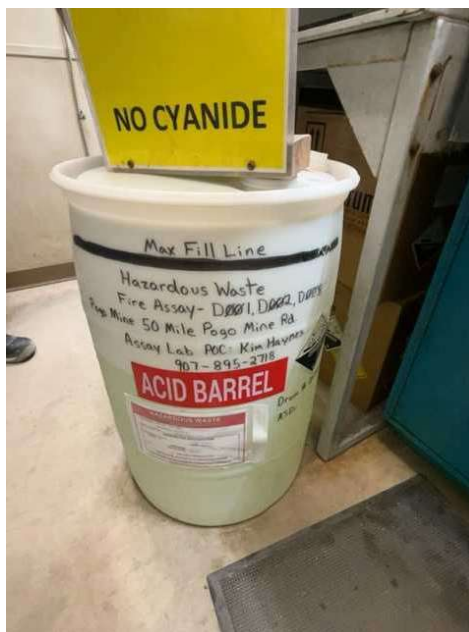
[Title]			IMG-20240910135853585375694.jpg
09/10/2024 01:58 PM (AKT)	No CBI	No PII	Photographer: Jon Jones
Assay Lab/SAA			64.45362822, -144.90491903
View of the SAA.			



[Title]			IMG-2024091013590559570310.jpg
09/10/2024 01:59 PM (AKT)	No CBI	No PII	Photographer: Jon Jones
Assay Lab/SAA			64.45362822, -144.90491903
View of the SAA.			



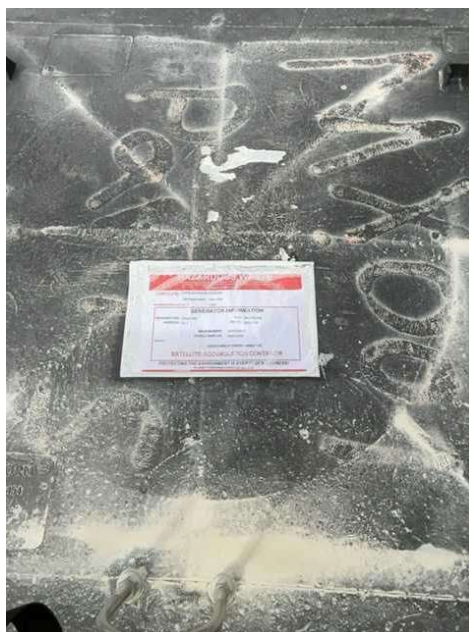
[Title]			IMG-2024091014011611676240.jpg
09/10/2024 02:01 PM (AKT)	No CBI	No PII	Photographer: Jon Jones
Assay Lab/SAA			64.45362822, -144.90491903
View of SAA in parting room.			



[Title]			IMG-2024091014012512571949.jpg
09/10/2024 02:01 PM (AKT)	No CBI	No PII	Photographer: Jon Jones
Assay Lab/SAA			64.45362822, -144.90491903
Close-up view of SAA container in parting room.			



[Title]			IMG-20240910140352352140130.jpg
09/10/2024 02:03 PM (AKT)	No CBI	No PII	Photographer: Jon Jones
Assay Lab/CAA			64.45362822, -144.90491903
View of waste tote containing hazardous Assay lab wastes.			



[Title]			IMG-2024091014040040127951.jpg
09/10/2024 02:04 PM (AKT)	No CBI	No PII	Photographer: Jon Jones
Assay Lab/CAA			64.45362822, -144.90491903
View of the waste labeling on the tote.			



[Title]			IMG-20240910141716171692532.jpg
09/10/2024 02:17 PM (AKT)	No CBI	No PII	Photographer: Jon Jones
Assay Lab/SAA			64.45362822, -144.90491903
View of a SAA container, beneath pouring hood, collecting waste crucibles that is seen here not labeled "Hazardous Waste," not marked with a hazard indicator, and not closed.			



[Title]			IMG-20240910141722172278969.jpg
09/10/2024 02:17 PM (AKT)	No CBI	No PII	Photographer: Jon Jones
Assay Lab/SAA			64.45362822, -144.90491903
Another view of the same SAA container, beneath pouring hood, collecting waste crucibles that is not labeled "Hazardous Waste," not marked with a hazard indicator, and not closed.			



[Title]			IMG-202409101417431743104681.jpg
09/10/2024 02:17 PM (AKT)	No CBI	No PII	Photographer: Jon Jones
Assay Lab/SAA			64.45362822, -144.90491903
View of the Assay lab waste in the bottom of the container.			



[Title]			IMG-20240910141754175497093.jpg
09/10/2024 02:17 PM (AKT)	No CBI	No PII	Photographer: Jon Jones
Assay Lab/SAA			64.45362822, -144.90491903
View of some of the slag waste seen here still on the table.			



[Title]			IMG-20240910142019201998205.jpg
09/10/2024 02:20 PM (AKT)	No CBI	No PII	Photographer: Jon Jones
Assay Lab/SAA			64.45362822, -144.90491903
View of the round lid for the table opening seen here on another table.			



[Title]			IMG-20240910142031203188018.jpg
09/10/2024 02:20 PM (AKT)	No CBI	No PII	Photographer: Jon Jones
Assay Lab/SAA			64.4596287, -144.91370569
View of the lid after being placed back over the opening on the table.			



[Title]			IMG-20240910142413241385972.jpg
09/10/2024 02:24 PM (AKT)	No CBI	No PII	Photographer: Jon Jones
Assay Lab/SAA			64.45998966, -144.91444431
View of crucibles that go into the tote.			



[Title]			IMG-20240910151452145296364.jpg
09/10/2024 03:14 PM (AKT)	No CBI	No PII	Photographer: Jon Jones
Under Ground/#1352 Shop			64.4544368, -144.90612976
View of the aerosol collection container with a universal waste label that is obstructed with dirt and grime.			



[Title]			IMG-20240910151456145696387.jpg
09/10/2024 03:14 PM (AKT)	No CBI	No PII	Photographer: Jon Jones
Under Ground/#1352 Shop			64.4544368, -144.90612976
Another view of the aerosol collection container with a universal waste label that is obstructed with dirt and grime.			



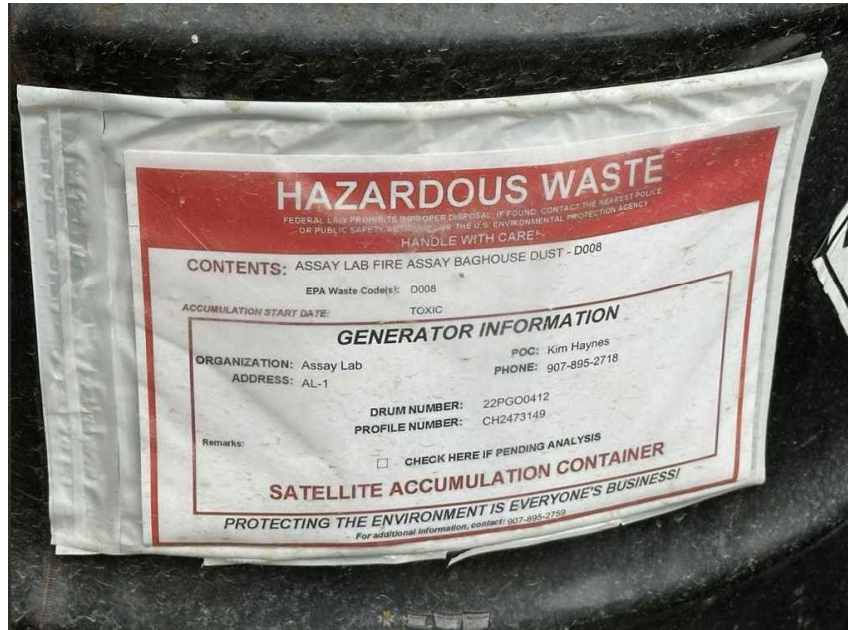
[Title]			IMG-2024091015150115195885.jpg
09/10/2024 03:15 PM (AKT)	No CBI	No PII	Photographer: Jon Jones
Under Ground/#1352 Shop			64.4544368, -144.90612976
Another view of the aerosol collection container with a universal waste label that is obstructed with dirt and grime.			



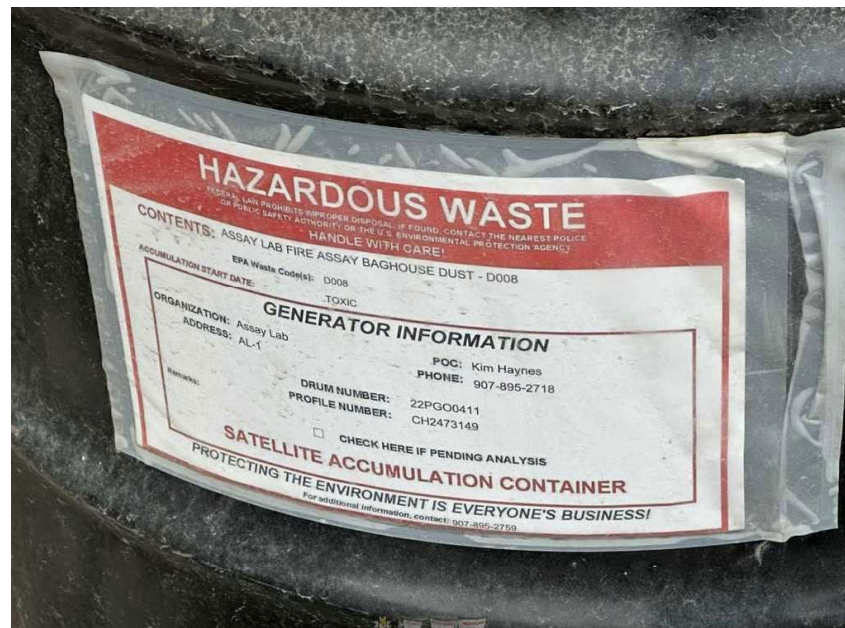
[Title]			IMG-20240910154259425999122.jpg
09/10/2024 03:42 PM (AKT)	No CBI	No PII	Photographer: Jon Jones
Under Ground/#1352 Shop			64.45362822, -144.90491903
View of waste aerosol can, seen here in the front, center of the second shelf of the storage cabinet.			



[Title]			IMG-20240910154314431491457.jpg
09/10/2024 03:43 PM (AKT)	No CBI	No PII	Photographer: Jon Jones
Under Ground/#1352 Shop			64.45362822, -144.90491903
Close-up view of waste aerosol can, seen here showing the hazards listed on the back of the can.			



[Title]			22PGO0412_Label.JPG
09/11/2024 12:03 PM	No CBI	No PII	Photographer: Provided by facility
Assay Lab/CAA			[Geographic Coordinates]
Photo of the container label sent in by the facility showing no changes. The label still indicates the container is an SAA container vs an accumulation container and there is no ASD.			



[Title]			22PGO0411_Label.JPG
09/11/2024 12:03 PM	No CBI	No PII	Photographer: Provided by facility
Assay Lab/CAA			[Geographic Coordinates]
Photo of the container label sent in by the facility showing no changes. The label still indicates the container is an SAA container vs an accumulation container and there is no ASD.			



[Title]			22PG00414_Label.JPG
09/11/2024 12:04 PM	No CBI	No PII	Photographer: Provided by facility
Assay Lab/CAA			[Geographic Coordinates]
Photo of the container label sent in by the facility showing no changes. The label still indicates the container is an SAA container vs an accumulation container and there is no ASD.			



[Title]			22PG00413_Label.JPG
09/12/2024 07:27 AM	No CBI	No PII	Photographer: Provided by facility
Assay Lab/CAA			[Geographic Coordinates]
Photo of the container label sent in by the facility showing no changes. The label still indicates the container is an SAA container vs an accumulation container and there is no ASD.			



[Title]			New UG 1352 Drum label.png
[Image Capture Date]	No CBI	No PII	Photographer: Provided by facility
Under Ground/#1352 Shop			[Geographic Coordinates]
Corrective action photo showing the container had been labeled with a Universal Waste label.			



[Title]			Labeling of Used Oil trays (pic 3).png
[Image Capture Date]	No CBI	No PII	Photographer: Provided by facility
Mobile Equipment Maintenance (MEM)/Yellow Flammable storage cabinet			[Geographic Coordinates]
Corrective action photo showing that used oil storage units were labeled with the words "Used Oil."			



[Title]			Labeling of Used Oil trays (pic 1).png
[Image Capture Date]	No CBI	No PII	Photographer: Provided by facility
Mobile Equipment Maintenance (MEM)/Yellow Flammable storage cabinet			[Geographic Coordinates]
Corrective action photo showing that used oil storage units were labeled with the words "Used Oil."			



[Title]			Labeling of Used Oil trays (pic 2).png
[Image Capture Date]	No CBI	No PII	Photographer: Provided by facility
Mobile Equipment Maintenance (MEM)/Yellow Flammable storage cabinet			[Geographic Coordinates]
Corrective action photo showing that used oil storage units were labeled with the words "Used Oil."			

APPENDIX 2: DOCUMENT LOG

Document Type	Document Name	Contains CBI	Contains PII	Uploaded By	Date Received
Records Review	BR-2019-AKR000005553.pdf	No	No	Jon Jones	11/15/2024
Records Review	BR-2021-AKR000005553.pdf	No	No	Jon Jones	11/15/2024
Records Review	2020.09.11 45-Day Exception Report Letterhead.pdf	No	No	Jon Jones	11/15/2024
Records Review	2020.12.04 45-Day Exception Report Letterhead.pdf	No	No	Jon Jones	11/15/2024
Records Review	2021.02.26 45-Day Exception Report Letterhead.pdf	No	No	Jon Jones	11/15/2024
Records Review	2021.05.17 45-Day Exception Report Letterhead.pdf	No	No	Jon Jones	11/15/2024
Records Review	2021.07.16 45-Day Exception Report Letterhead.pdf	No	No	Jon Jones	11/15/2024
Records Review	2021.10.11 45-Day Exception Report Letterhead.pdf	No	No	Jon Jones	11/15/2024
Records Review	2021.11.22 45-Day Exception Report Letterhead.pdf	No	No	Jon Jones	11/15/2024
Records Review	2022.02.14 45-Day Exception Report Letterhead.pdf	No	No	Jon Jones	11/15/2024
Records Review	2022.04.15 45-Day Exception Report Letterhead.pdf	No	No	Jon Jones	11/15/2024
Records Review	2022.07.08 45-Day Exception Report Letterhead.pdf	No	No	Jon Jones	11/15/2024
Records Review	2022.08.26 45-Day Exception Report Letterhead.pdf	No	No	Jon Jones	11/15/2024
Records Review	2022.10.28 45-day Manifest Exception Report letter.pdf	No	No	Jon Jones	11/15/2024

Records Review	2023.01.10 45-Day Exception Report Letterhead.pdf	No	No	Jon Jones	11/15/2024
Records Review	2023.09.07 45-Day Exception Report Letterhead.pdf	No	No	Jon Jones	11/15/2024
Records Review	2023.11.02 45-Day Exception Report Letterhead.pdf	No	No	Jon Jones	11/15/2024
Records Review	2023.11.26 45-Day Exception Report Letterhead.pdf	No	No	Jon Jones	11/15/2024
Records Review	2023.12.29 45-Day Exception Report Letterhead.pdf	No	No	Jon Jones	11/15/2024
Records Review	2024.02.09 45-Day Exception Report Letterhead.pdf	No	No	Jon Jones	11/15/2024
Records Review	2024.02.09 45-Day Exception Report Letterhead.pdf	No	No	Jon Jones	11/15/2024
Records Review	2024.04.11 45-Day Exception Report Letterhead.pdf	No	No	Jon Jones	11/15/2024
Records Review	2024.06.07 45-Day Exception Report Letterhead.pdf	No	No	Jon Jones	11/15/2024
Records Review	2024.07.26 45-Day Exception Report Letterhead.pdf	No	No	Jon Jones	11/15/2024
Records Review	2024.09.16 45-Day Exception Report Letterhead.pdf	No	No	Jon Jones	11/15/2024
Communications	File request 10.2.24.docx	No	No	Jon Jones	11/15/2024
Communications	jsalzman 10.17.24 response.docx	No	No	Jon Jones	11/15/2024
Communications	2024 EPA RCRA Inspection at Pogo 10-Sept-2024.msg	No	No	Jon Jones	11/15/2024
Sampling Results	P-24-241-008 Tritherm Coolant.pdf	No	No	Jon Jones	11/15/2024
Other - Safety Data Sheet	SDS_Citric Acid - Assay Lab.pdf	No	No	Jon Jones	11/15/2024
Other - Safety Data Sheet	SDS_Citric Acid - Water Ops.pdf	No	No	Jon Jones	11/15/2024

Manifests	Manifest 006952331 JJK Return Copy.pdf	No	No	Jon Jones	11/15/2024
Manifests	Manifest 006952332 JJK Return Copy.pdf	No	No	Jon Jones	11/15/2024
Manifests	Manifest 006952342 JJK Return Copy.pdf	No	No	Jon Jones	11/15/2024
Manifests	Manifest 006952343 JJK Return Copy.pdf	No	No	Jon Jones	11/15/2024
Manifests	Manifest 016896770 JJK - Return w- pg 4 added.pdf	No	No	Jon Jones	11/15/2024
Manifests	Manifest 016896771 JJK - Return.pdf	No	No	Jon Jones	11/15/2024
Manifests	Manifest 016896773 JJK Return Copy.pdf	No	No	Jon Jones	11/15/2024
Manifests	Manifest 016896799 JJK Return Copy.pdf	No	No	Jon Jones	11/15/2024
Manifests	Manifest 016896815 JJK Return Copy.pdf	No	No	Jon Jones	11/15/2024
Manifests	Manifest 016896816 JJK Return Copy.pdf	No	No	Jon Jones	11/15/2024
Manifests	Manifest 016896818 JJK Return Copy.pdf	No	No	Jon Jones	11/15/2024
Manifests	Manifest 016896835 JJK - returned.pdf	No	No	Jon Jones	11/15/2024
Manifests	Manifest 016896836 JJK - Return.pdf	No	No	Jon Jones	11/15/2024
Manifests	Manifest 016896846 JJK - Return.pdf	No	No	Jon Jones	11/15/2024
Manifests	Manifest 016896847 JJK - Return.pdf	No	No	Jon Jones	11/15/2024
Manifests	Manifest 016896848 JJK - Return R-I.pdf	No	No	Jon Jones	11/15/2024
Manifests	Manifest 016896854 JJK - Return.pdf	No	No	Jon Jones	11/15/2024
Manifests	Manifest 016896857 JJK - Return E-manifest.pdf	No	No	Jon Jones	11/15/2024
Manifests	Manifest 016896858 JJK - Return R-I.pdf	No	No	Jon Jones	11/15/2024
Manifests	Manifest 016896875 JJK LDR - Return E- manifest.pdf	No	No	Jon Jones	11/15/2024
Manifests	Manifest 016896877 JJK - Return E-manifest.pdf	No	No	Jon Jones	11/15/2024

Manifests	Manifest 016896878 JJK - Return_Mangled.pdf	No	No	Jon Jones	11/15/2024
Manifests	Manifest 016896884 JJK - Return.pdf	No	No	Jon Jones	11/15/2024
Manifests	Manifest 016896888 JJK - Return via E-manifest.pdf	No	No	Jon Jones	11/15/2024
Manifests	Manifest 016896889 JJK - Return via E-manifest.pdf	No	No	Jon Jones	11/15/2024
Manifests	Manifest 016896890 JJK - Return via E-manifest.pdf	No	No	Jon Jones	11/15/2024
Manifests	Manifest 016896893 JJK - Return via E-manifest.pdf	No	No	Jon Jones	11/15/2024
Manifests	Manifest 016896915 JJK - E-manifest Return Copy.pdf	No	No	Jon Jones	11/15/2024
Manifests	Manifest 016896916 JJK - E-manifest Return Copy.pdf	No	No	Jon Jones	11/15/2024
Manifests	Manifest 016896917 JJK - E-manifest Return Copy.pdf	No	No	Jon Jones	11/15/2024
Manifests	Manifest 016896918 JJK - E-manifest Return Copy.pdf	No	No	Jon Jones	11/15/2024
Manifests	Manifest 016896919 JJK - E-manifest Return Copy.pdf	No	No	Jon Jones	11/15/2024
Manifests	Manifest 016896921 JJK - E-manifest Return Copy.pdf	No	No	Jon Jones	11/15/2024
Manifests	Manifest 016896923 JJK - Return via RCRAInfo.pdf	No	No	Jon Jones	11/15/2024
Manifests	Manifest 016896923 JJK Return Copy.pdf	No	No	Jon Jones	11/15/2024
Manifests	Manifest 016896925 JJK - Return via RCRAInfo.pdf	No	No	Jon Jones	11/15/2024
Manifests	Manifest 016896925 JJK Return Copy.pdf	No	No	Jon Jones	11/15/2024

Manifests	Manifest 016896926 JJK - Return via RCRAInfo.pdf	No	No	Jon Jones	11/15/2024
Manifests	Manifest 016896926 JJK Return Copy.pdf	No	No	Jon Jones	11/15/2024
Manifests	Manifest 016896927 JJK - Return e-manifest.pdf	No	No	Jon Jones	11/15/2024
Manifests	Manifest 016896927 JJK Returned.pdf	No	No	Jon Jones	11/15/2024
Manifests	Manifest 016896928 JJK - Return e-manifest.pdf	No	No	Jon Jones	11/15/2024
Manifests	Manifest 016896928 JJK Return Copy.pdf	No	No	Jon Jones	11/15/2024
Manifests	Manifest 016896929 JJK - Return e-manifest.pdf	No	No	Jon Jones	11/15/2024
Manifests	Manifest 016896929 JJK Return Copy.pdf	No	No	Jon Jones	11/15/2024
Manifests	Manifest 016896931 JJK Return Copy.pdf	No	No	Jon Jones	11/15/2024
Manifests	Manifest 016896933 JJK - Return via RCRAInfo.pdf	No	No	Jon Jones	11/15/2024
Manifests	Manifest 016896936 JJK - Return.pdf	No	No	Jon Jones	11/15/2024
Manifests	Manifest 016896937 JJK - Return Copy.pdf	No	No	Jon Jones	11/15/2024
Manifests	Manifest 016896938 JJK - Return Copy.pdf	No	No	Jon Jones	11/15/2024
Manifests	Manifest 016896940 JJK Return Copy.pdf	No	No	Jon Jones	11/15/2024
Manifests	Manifest 016896941 JJK Return Copy.pdf	No	No	Jon Jones	11/15/2024
Manifests	Manifest 016896948 JJK - Return Copy RCRA Info.pdf	No	No	Jon Jones	11/15/2024
Manifests	Manifest 016896952 JJK - Return Copy.pdf	No	No	Jon Jones	11/15/2024
Manifests	Manifest 016896953 JJK Return Copy - RCRA Info.pdf	No	No	Jon Jones	11/15/2024
Manifests	Manifest 016896954 JJK - Return Copy - RCRAInfo.pdf	No	No	Jon Jones	11/15/2024
Manifests	Manifest 016896991JJK - Return E-Manifest.pdf	No	No	Jon Jones	11/15/2024

Manifests	Manifest 016896992JJK - Return E-Manifest.pdf	No	No	Jon Jones	11/15/2024
Manifests	Manifest 016896993JJK Return E-Manifest.pdf	No	No	Jon Jones	11/15/2024
Manifests	Manifest 016896994JJK - Returned E- Manifest.pdf	No	No	Jon Jones	11/15/2024
Manifests	Manifest 016896995JJK - Returned E- Manifest.pdf	No	No	Jon Jones	11/15/2024
Manifests	Manifest 022232008 JJK - Returned Copy.pdf	No	No	Jon Jones	11/15/2024
Manifests	Manifest 022232009JJK - Return via E- Manifest.pdf	No	No	Jon Jones	11/15/2024
Manifests	Manifest 022232010 JJK - Returned Copy.pdf	No	No	Jon Jones	11/15/2024
Manifests	Manifest 022232025 JJK - Return Copy from E- Manifest.pdf	No	No	Jon Jones	11/15/2024
Manifests	Manifest 022232026 JJK - Return Copy from E- manifest.pdf	No	No	Jon Jones	11/15/2024
Manifests	Manifest 022232027 JJK - Return Copy from E- Manifest.pdf	No	No	Jon Jones	11/15/2024
Manifests	Manifest 022232034 JJK - Return Copy E- Manifest.pdf	No	No	Jon Jones	11/15/2024
Manifests	Manifest 022232035 JJK - Return Copy via E- manifest.pdf	No	No	Jon Jones	11/15/2024
Manifests	Manifest 022232036 JJK - Return Copy via E- manifest.pdf	No	No	Jon Jones	11/15/2024
Manifests	Manifest 022232037 JJK - Return Copy via E- Manifest.pdf	No	No	Jon Jones	11/15/2024
Manifests	Manifest 022232038 JJK - Return Copy via E- Manifest.pdf	No	No	Jon Jones	11/15/2024
Manifests	Manifest 022232041 JJK - Returned Copy.pdf	No	No	Jon Jones	11/15/2024
Manifests	Manifest 022232042 JJK - Return Copy via E- manifest.pdf	No	No	Jon Jones	11/15/2024

Manifests	Manifest 022232043 JJK - Return Copy via E-manifest.pdf	No	No	Jon Jones	11/15/2024
Manifests	Manifest 022232044 JJK - Return Copy via E-manifest.pdf	No	No	Jon Jones	11/15/2024
Manifests	Manifest 022232060 JJK Return Copy via E-manifest.pdf	No	No	Jon Jones	11/15/2024
Manifests	Manifest 022232062 JJK - Return Copy via E-manifest.pdf	No	No	Jon Jones	11/15/2024
Manifests	Manifest 022232063 JJK - Return Copy via E-manifest.pdf	No	No	Jon Jones	11/15/2024
Manifests	Manifest 022232066 JJK - Return Copy via E-manifest.pdf	No	No	Jon Jones	11/15/2024
Manifests	Manifest 022232068 JJK - Return Copy via E-Manifest.pdf	No	No	Jon Jones	11/15/2024
Manifests	Manifest 022232069 JJK - Return Copy via E-Manifest.pdf	No	No	Jon Jones	11/15/2024
Other - Photo	Aerosol Storage - post punctures (pic 1).pdf	No	No	Jon Jones	11/15/2024
Other - Photo	Aerosol Storage - post punctures (pic 2).pdf	No	No	Jon Jones	11/15/2024
Other - Photo	Aerosol Storage - post punctures (pic 3).pdf	No	No	Jon Jones	11/15/2024
Other - Photo	Assay Lab - Bucket Label.pdf	No	No	Jon Jones	11/15/2024
Other - Photo	Assay Lab - Slag Drum Label.pdf	No	No	Jon Jones	11/15/2024
Communications	COR-24-074 - EPA RCRA Compliance Evaluation Inspection of Pogo Mine.docx	No	No	Jon Jones	11/18/2024
Communications	Attachment1.pdf	No	No	Jon Jones	11/18/2024
Communications	Attachment2.pdf	No	No	Jon Jones	11/18/2024
Communications	Attachment3.pdf	No	No	Jon Jones	11/18/2024
Communications	Attachment4.pdf	No	No	Jon Jones	11/18/2024
Communications	Attachment5.pdf	No	No	Jon Jones	11/18/2024
Communications	Attachment6.pdf	No	No	Jon Jones	11/18/2024
Communications	Attachment7.pdf	No	No	Jon Jones	11/18/2024

Communications	Attachment9.pdf	No	No	Jon Jones	11/18/2024
Communications	Attachment10.pdf	No	No	Jon Jones	11/18/2024
Communications	Attachment11.pdf	No	No	Jon Jones	11/18/2024
Communications	Attachment12.pdf	No	No	Jon Jones	11/18/2024
Communications	Attachment8_Part1.pdf	No	No	Jon Jones	11/18/2024
Communications	Attachment8_Part2.pdf	No	No	Jon Jones	11/18/2024
Weekly Inspections	Calendar Year 2021 Pogo Waste Containment CAA weekly inspections.xlsx	No	No	Jon Jones	11/18/2024
Weekly Inspections	Calendar Year 2021 Pogo Flammable Storage CAA weekly inspections.xlsx	No	No	Jon Jones	11/18/2024
Weekly Inspections	Calendar Year 2021 Assay Lab HWAA weekly inspections.xlsx	No	No	Jon Jones	11/18/2024
Weekly Inspections	Calendar Year 2022 Pogo Waste Containment CAA weekly inspections.xlsx	No	No	Jon Jones	11/18/2024
Weekly Inspections	Calendar Year 2022 Pogo Flammable Storage CAA weekly inspections.xlsx	No	No	Jon Jones	11/18/2024
Weekly Inspections	Calendar Year 2022 Assay Lab HWAA weekly inspections.xlsx	No	No	Jon Jones	11/18/2024
Weekly Inspections	Calendar Year 2023 Pogo Waste Containment CAA weekly inspections using InForm.xlsx	No	No	Jon Jones	11/18/2024
Weekly Inspections	Calendar Year 2023 Pogo Flammable Storage CAA weekly inspections using InForm.xlsx	No	No	Jon Jones	11/18/2024
Weekly Inspections	Calendar Year 2023 Assay Lab HWAA weekly inspections using InForm.xlsx	No	No	Jon Jones	11/18/2024
Weekly Inspections	1 - Assay Lab HWAA Weekly Inspection 1- January-2024_Part1.pdf	No	No	Jon Jones	11/18/2024

Weekly Inspections	1 - Assay Lab HWAA Weekly Inspection 1- January-2024_Part2.pdf	No	No	Jon Jones	11/18/2024
Weekly Inspections	1 - Assay Lab HWAA Weekly Inspection 1- January-2024_Part3.pdf	No	No	Jon Jones	11/18/2024
Weekly Inspections	1 - Assay Lab HWAA Weekly Inspection 1- January-2024_Part4.pdf	No	No	Jon Jones	11/18/2024
Weekly Inspections	1 - Assay Lab HWAA Weekly Inspection 1- January-2024_Part5.pdf	No	No	Jon Jones	11/18/2024
Weekly Inspections	35 - PFSB Weekly Inspection 29-Aug- 2024.pdf	No	No	Jon Jones	11/19/2024
Weekly Inspections	36 - PFSB Weekly Inspection 05-Sept- 2024.pdf	No	No	Jon Jones	11/19/2024
Weekly Inspections	35 - PWCB Weekly Inspection 29-Aug- 2024.pdf	No	No	Jon Jones	11/19/2024
Weekly Inspections	36 - PWCB Weekly Inspection 05-Sept- 2024.pdf	No	No	Jon Jones	11/19/2024
Weekly Inspections	35 - Assay Lab HWAA Weekly Inspection 29- Aug-2024.pdf	No	No	Jon Jones	11/19/2024
Weekly Inspections	36 - Assay Lab HWAA Weekly Inspection 05- Sept-2024.pdf	No	No	Jon Jones	11/19/2024
Weekly Inspections	1 - Aerosol Can Puncturing Unit Weekly Inspection 1-January- 2024.pdf	No	No	Jon Jones	11/19/2024
Weekly Inspections	2 - Aerosol Can Puncturing Unit Weekly Inspection 8-January- 2024.pdf	No	No	Jon Jones	11/19/2024
Weekly Inspections	3 - Aerosol Can Puncturing Unit Weekly Inspection 20-January- 2024.pdf	No	No	Jon Jones	11/19/2024
Weekly Inspections	4 - Aerosol Can Puncturing Unit Weekly Inspection 26-January- 2024.pdf	No	No	Jon Jones	11/19/2024

Weekly Inspections	5 - Aerosol Can Puncturing Unit Weekly Inspection 30-January- 2024.pdf	No	No	Jon Jones	11/19/2024
Weekly Inspections	6 - Aerosol Can Puncturing Unit Weekly Inspection 10-February- 2024.pdf	No	No	Jon Jones	11/19/2024
Weekly Inspections	7 - Aerosol Can Puncturing Unit Weekly Inspection 13-February- 2024.pdf	No	No	Jon Jones	11/19/2024
Weekly Inspections	8 - Aerosol Can Puncturing Unit Weekly Inspection 20-February- 2024.pdf	No	No	Jon Jones	11/19/2024
Weekly Inspections	9 - Aerosol Can Puncturing Unit Weekly Inspection 26-February- 2024.pdf	No	No	Jon Jones	11/19/2024
Weekly Inspections	10 - Aerosol Can Puncturing Unit Weekly Inspection 04-March- 2024.pdf	No	No	Jon Jones	11/19/2024
Weekly Inspections	11 - Aerosol Can Puncturing Unit Weekly Inspection 11-March- 2024.pdf	No	No	Jon Jones	11/19/2024
Weekly Inspections	12 - Aerosol Can Puncturing Unit Weekly Inspection 18-March- 2024.pdf	No	No	Jon Jones	11/19/2024
Weekly Inspections	13 - Aerosol Can Puncturing Unit Weekly Inspection 27-March- 2024.pdf	No	No	Jon Jones	11/19/2024
Weekly Inspections	14 - Aerosol Can Puncturing Unit Weekly Inspection 01-April- 2024.pdf	No	No	Jon Jones	11/19/2024
Weekly Inspections	15 - Aerosol Can Puncturing Unit Weekly Inspection 08-April- 2024.pdf	No	No	Jon Jones	11/19/2024
Weekly Inspections	16 - Aerosol Can Puncturing Unit Weekly	No	No	Jon Jones	11/19/2024

	Inspection 20-April-2024.pdf				
Weekly Inspections	17 - Aerosol Can Puncturing Unit Weekly Inspection 25-April-2024.pdf	No	No	Jon Jones	11/19/2024
Weekly Inspections	17 - Aerosol Can Puncturing Unit Weekly Inspection 25-April-2024.pdf	No	No	Jon Jones	11/19/2024
Weekly Inspections	18 - Aerosol Can Puncturing Unit Weekly Inspection 29-April-2024.pdf	No	No	Jon Jones	11/19/2024
Weekly Inspections	19 - Aerosol Can Puncturing Unit Weekly Inspection 09-May-2024.pdf	No	No	Jon Jones	11/19/2024
Weekly Inspections	20 - Aerosol Can Puncturing Unit Weekly Inspection 14-May-2024.pdf	No	No	Jon Jones	11/19/2024
Weekly Inspections	21 - Aerosol Can Puncturing Unit Weekly Inspection 24-May-2024.pdf	No	No	Jon Jones	11/19/2024
Weekly Inspections	22 - Aerosol Can Puncturing Unit Weekly Inspection 01-June-2024.pdf	No	No	Jon Jones	11/19/2024
Weekly Inspections	23 - Aerosol Can Puncturing Unit Weekly Inspection 07-June-2024.pdf	No	No	Jon Jones	11/19/2024
Weekly Inspections	24 - Aerosol Can Puncturing Unit Weekly Inspection 11-June-2024.pdf	No	No	Jon Jones	11/19/2024
Weekly Inspections	25 - Aerosol Can Puncturing Unit Weekly Inspection 22-June-2024.pdf	No	No	Jon Jones	11/19/2024
Weekly Inspections	26 - Aerosol Can Puncturing Unit Weekly Inspection 29-June-2024.pdf	No	No	Jon Jones	11/19/2024

Weekly Inspections	27 - Aerosol Can Puncture Unit Weekly Inspection 04-July-2024.pdf	No	No	Jon Jones	11/19/2024
Weekly Inspections	28 - Aerosol Can Puncture Unit Weekly Inspection 12-July-2024.pdf	No	No	Jon Jones	11/19/2024
Weekly Inspections	29 - Aerosol Can Puncture Unit Weekly Inspection 20-July-2024.pdf	No	No	Jon Jones	11/19/2024
Weekly Inspections	30 - Aerosol Can Puncture Unit Weekly Inspection 27-July-2024.pdf	No	No	Jon Jones	11/19/2024
Weekly Inspections	31 - Aerosol Can Puncture Unit Weekly Inspection 03-Aug-2024.pdf	No	No	Jon Jones	11/19/2024
Weekly Inspections	32 - Aerosol Can Puncture Unit Weekly Inspection 06-Aug-2024.pdf	No	No	Jon Jones	11/19/2024
Weekly Inspections	33 - Aerosol Can Puncture Unit Weekly Inspection 16-Aug-2024.pdf	No	No	Jon Jones	11/19/2024
Weekly Inspections	34 - Aerosol Can Puncture Unit Weekly Inspection 23-Aug-2024.pdf	No	No	Jon Jones	11/19/2024
Weekly Inspections	35 - Aerosol Can Puncture Unit Weekly Inspection 29-Aug-2024.pdf	No	No	Jon Jones	11/19/2024
Weekly Inspections	36 - Aerosol Can Puncture Unit Weekly Inspection 05-Sept-2024.pdf	No	No	Jon Jones	11/19/2024