

REGION 10 Enforcement Division

INSPECTION REPORT

Inspection Date(s):	07/27/2021 - 07/27/2021	Announced: No	
Time:	Entry: 08:22 AM (AKT)	Exit: 10:16 AM (AKT)	
Program:	RCRA		
Regulatory Program(s):	Title 40 - ENVIRONMENTAL PROTECTION AGENCY		
If Access is Denied:			
Company Name:	US Ecology Alaska		
Facility or Site Name:	US Ecology Alaska, LLC		
Facility/Site Physical Address:	44066 KENAI SPUR HIGHWAY		
(City, state, zip code)	KENAI, AK 99611		
Type of Operation:	Hazardous waste transporter and 10-day transfer facility		
Size of Facility:	10 acres, 11,000 square ft. Building		
Length of Facility at Location:	Since 2011		
Geographic Coordinates:	60.619034, -151.328205		
Mailing address: (Secondary Address)	Rick Reimer, Director of Operations – Alaska rick.reimer@usecology.com 425 Outer Springer Loop Road Palmer, AK 99645 Phone: 907-258-1558 CC: Lori Wagoner, Kenai Branch Manager lori.wagoner@usecology.com		
(City, state, zip code)	Palmer, AK 99645		
County:			
Facility/Site Identifier:	AKR000203984		
Media Number:	N/A		
NAICS:	54162 ENVIRONMENTAL CONSULTING SERVICES 562219 OTHER NONHAZARDOUS WASTE TREATMENT AND DISPOSAL 562998 ALL OTHER MISCELLANEOUS WASTE MANAGEMENT SERVICES		
Lead Inspector:			
Jon Jones			
	REGION 10	Jones.Jon@epa.gov	(907) 271-6329
Supervisor Review:			
Jen Sullivan			
	REGION 10	Sullivan.Jennifer.A@epa.gov	(206) 553-6978

SECTION I – INTRODUCTION**Purpose of the Inspection/Objective**

Type of inspection: CEI - Compliance Evaluation Inspection

This was a Resource Conservation and Recovery Act (RCRA) inspection. The facility was inspected to ensure compliance with standards for hazardous waste generators and universal waste management (40 C.F.R. Part 262 through 273) and used oil management (40 C.F.R. Part 279). The inspection was conducted as part of a Core Program requirement for FY 2021.

Attendees

Title	Name	Phone	Email	Present in Opening Conf.	Present in Closing Conf.
Lead Inspector	Jon Jones	9072716329	Jones.Jon@epa.gov	Yes	Yes
Kenai Branch Manager	Lori Wagoner	(907) 395-4623	lori.wagoner@usecology.com	Yes	Yes

Opening Conference

EPA Lead Inspector Jon Jones arrived at the US Ecology Alaska, LLC. at 08:22 AM (AKT) on 07/27/2021 for an inspection. I presented my credentials to Ms. Lori Wagoner, Kenai Branch Manager, and informed her that this was an EPA RCRA inspection. The table above presents all the opening and closing conference participants.

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

I was accompanied for the duration of the inspection by Ms. Wagoner and Mr. Nick Russell, Technical Specialist 2.

Facility/Site Description

US Ecology Alaska, LLC is a Waste Management and Environmental Consulting Service. The facility also treats and disposes of non-hazardous wastes and operates as a hazardous waste transporter with an onsite 10-day transfer area. The facility is in an industrial/business area north of Kenai, AK.

Facility Info

Number of employees	11
Weather Conditions	Cool and sunny
Operating Hours	8:00 a.m. to 5:00 p.m., Monday through Friday
Safety Training Provided to Inspector(s)?	No
What type of generator facility notified?	VSQG

What type of generator facility verified as?	verified by Lori to be VSQG
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Process Description

On the day of the inspection, the facility was in the process of mobilizing personnel for a spill response. I was greeted by Ms. Lori Wagoner, Kenai Branch Manager, and asked if I could give her a little time to get personnel mobilized prior to beginning the inspection. Ms. Wagoner followed up in an email, dated 8/6/21, to inform me that there were no fatalities or substantial injuries in the accident and that cleanup and disposal were ongoing.

The following information was obtained from Ms. Wagoner during the opening conference:

- NRC Alaska, LLC was purchased by US Ecology and as of July 16, 2021 operates as US Ecology
- No longer taking drilling muds, due to the industry downturn in oil production and drilling (Hilcorp is now taking their own drilling muds to their own grind and inject wells.)
- Facility conducts Vac truck tank cleaning operations and transfer facility activities
- Facility also cleans equipment shipped down to them from North Slope Alaska, such as heat exchanger bundles.

Vac truck tank cleaning takes place in several wash bays in the facility. The tanks are power washed and the contents flow into one of two large 4,200-gallon floor pits. Analytical testing is performed prior to pit clean-out. The water/liquids are trucked to the US Ecology (Formerly NRC Alaska, LLC), Viking road site in Anchorage, AK for processing. The solids are usually non-hazardous. They are solidified, bagged, then shipped to the Columbia Ridge Landfill in Oregon.

Wastes at the facility include the infrequent generation of the following:

- Spent aerosol cans are accumulated and punctured onsite. The waste aerosol residue/liquids are managed as hazardous waste.
- Spent lamps and batteries that are managed as universal waste and disposed of at the local household hazardous waste facility.

Building(s)

Building/Area/Sub-area	Process Description	Area of Concern
10-day Transfer area	10-day transfer area for the staging of hazardous waste.	No
Wash Bay	Cleaning of Heat exchanger bundles (E&P exempt), Portable holding tanks, and Vac trucks	No

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

Building: Wash Bay	Contains CBI: No
Observation #: JJ1-OB-001	Date: 07/27/2021
While in the wash bay I observed a very large heat exchanger bundle waiting to be cleaned. US Ecology provides	

a bundle cleaning service for entities up on Alaska's North Slope.

Photo(s)

1. [Observation Image-202107270949014911697251.jpg](#)

Records Review

Record: Shipping Documents/Tolling agreements		AOC: No
Ref #: JJ1-RR-001	Reviewed By: Jon Jones	Reviewed Date: 09/29/2021
Following the inspection, I received an email from Ms. Wagoner, dated 8/6/21, that included an attached log of the facility's receiving and outbound shipments through the Kenai facility. It was filtered for hazardous waste shipments and included the number of days onsite. In the email, Ms. Wagoner stated that there were four shipments that have exceeded the RCRA 10-day transfer holding time and she also included the manifests for those shipments in a second attachment to the email. The shipments are TSCA regulated ballasts that are required to travel on uniform hazardous waste manifests. They are not RCRA regulated.		
Document(s)		
1. 2019-July 2021 Shipment Summary.pdf 2. US Ecology - Kenai 10-day Transfer Trailer Log.pdf		

SECTION III – AREAS OF CONCERN

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

I observed no areas of concern at the time of the inspection.

SECTION IV – FOLLOW UP

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

Closing Conference

I held a closing conference to discuss the findings of my inspection. I thanked Ms. Wagoner for her time and cooperation during the inspection and told her that I did not observe any potential compliance concerns during my walk-through inspection. I explained the follow-up process that would take place after the inspection and then departed from the facility.

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

SECTION VI – LIST OF APPENDICES**Photo Log**

Observation Image- <u>202107270949014911697251.jpg</u>	
07/27/2021 09:49 AM (AKT)	
Jon Jones	
Wash Bay	
No CBI	
No PII	
View of a large heat exchanger bundle in the wash bay.	

Document Log

Document Type	Document Name	Contains CBI	Contains PII	Uploaded By	Date Received
Manifests	TSCA regulated ballast manifests 2019-2021.pdf	No	No	Jon Jones	09/28/2021
Records Review	2019-July 2021 Shipment Summary.pdf	No	No	Jon Jones	09/29/2021
Records Review	US Ecology - Kenai 10-day Transfer Trailer Log.pdf	No	No	Jon Jones	09/29/2021
Facility Map	Facility drawing.JPG	No	No	Jon Jones	09/29/2021
Other - Amended Certificate of Registration	Amended Certificate of Registration.JPG	No	No	Jon Jones	09/29/2021
Inspection Reports	Field_Notes_AKR000203984v1.0.pdf	No	No	Jon Jones	09/29/2021