

INSPECTION REPORT

Inspection Date(s):	04/26/2021 - 04/26/2021	Announced: No	
Time:	Entry: 08:09 AM (AKT)	Exit: 04:10 PM (AKT)	
Program:	RCRA		
Regulatory Program(s):	Title 40 - ENVIRONMENTAL PROTECTION AGENCY		
If Access is Denied:			
Company Name:	Tesoro Alaska Company, LLC		
Facility or Site Name:	TESORO ALASKA COMPANY LLC - KENAI REFINERY		
Facility/Site Physical Address:	54741 ENERGY WAY		
(city, state, zip code)	KENAI, AK 99611		
Type of Operation:	Petroleum Refinery		
Size of Facility:	135 acres within the fence line area		
Length of Facility at Location:	Since 1969		
Geographic Coordinates:	60.683603, -151.367204		
Mailing address:	Mr. Cameron Hunt, Plant Manager crhunt@marathonpetroleum.com		
(Secondary Address)	P.O. Box 3369		
	54741 Energy Way		
(city, state, zip code)	Kenai, AK 99611		
County:			
Facility/Site Identifier:	AKD048679682		
Media Number:	Unpermitted Facility		
NAICS:	324110 – Petroleum Refineries		
Lead Inspector:			
Jon Jones			
	REGION 10	Jones.Jon@epa.gov	(907) 271-6329
Additional Persons Participating in Inspection:			
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

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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
Contingency Planner	Gerald Warrick	(907) 252-8946	gtwarrick@marathonpetroleum.com	Yes	Yes
Environmental Administrator	Leah Vik	(907) 776-3819	ltvik@marathonpetroleum.com	Yes	Yes
Environmental Health & Safety	Amanda Millay	(907) 776-4225	amillay@marathonpetroleum.com	Yes	No
Environmental Health & Safety Manager	Marcus Garvin	(409) 750-1179	megarvin@marathonpetroleum.com	Yes	Yes
Environmental Supervisor	Michael Harper	(907) 776-3599	mdharper@marathonpetroleum.com	Yes	Yes

Opening Conference

EPA lead Inspector Jon Jones arrived at the Tesoro Alaska Company, LLC - Kenai Refinery at 08:09 AM (AKT) on 04/26/2021 for an inspection. I presented my credentials to Gerald Warrick and informed him that this was an EPA RCRA inspection. The table above presents all the inspection opening and closing conference participants.

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

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

Facility/Site Description

Tesoro Alaska Company, Kenai Refinery (hereafter referred to as Tesoro, Refinery or facility) is a petroleum refinery located in an industrial area with no nearby residential or other non-commercial properties.

Facility Info

Operating Hours	24/7, 365 with 12-hour shifts
Number of employees	Approximately 231
What type of generator facility notified?	Large Quantity Generator (LQG)

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What type of generator facility verified as?	LQG verified by Mr. Gerald Warrick, Contingency Planner
Weather Conditions	Cool and sunny
Safety Training Provided to Inspector(s)?	No

Process Description

According to Mr. Warrick, the facility is a petroleum refinery that began operating in 1969. Mr. Warrick explained the facility operations to me as follows: Tesoro's Kenai refinery facility receives crude oil from Tesoro's Kenai Pipeline (KPL) Company or from two pipelines from platforms in Cook Inlet. Tank 11 is the refinery's "charge tank" which is the introduction point for all crude oil processed at the facility. From Tank 11, crude oil is heated and flash-evaporated in the Crude Unit. From there, the crude goes to the Crude Tower. According to Plant Operations representatives, the following occurs in the Crude Tower:

- Bottoms are sent to the vacuum unit for processing, in which the bottoms are heated and fractionated into various products.
- Atmospheric gas oil is removed and sent to the hydrocracker.
- #2 diesel is sent to the distillate desulfurization unit (DDU).
- Jet A and ADF are removed and sent to the DDU.
- Lighter naphthas, LPG, methane and ethane are taken from the top and sent to the PRIP isomerization plant to convert these straight-chain molecules into higher-octane branched molecules.
- Heavier naphthas are sent to the catalytic reformer. Catalytic reforming is a chemical process used to convert petroleum refinery naphtha's, typically having low-octane ratings, into high-octane liquid products called reformates which are components of high-octane gasoline. In so doing, the process produces very significant amounts of byproduct hydrogen gas for use in several other processes. Other byproducts are small amounts of methane, ethane, propane, and butanes.
- The LPG plant uses simple distillation to separate isobutene and lighter components. This is a non-catalytic process, and wastes are generated only during maintenance.
- The Hydro-cracker takes atmospheric gas oil from the Crude Tower and Vacuum Unit. It uses high pressure and hydrogen to convert larger molecules into various smaller components which are generally used to make jet fuel. Wastes are generated during maintenance turn-around periods and include hydrotreater catalysts (listed wastes).
- The DOU desulfurizes diesel fuel. This catalytic process converts elemental sulfur to hydrogen sulfide. The hydrogen plant produces hydrogen using a natural gas and steam feed, splitting off hydrogen with a catalyst. The DIB (de-isobutane) plant takes LPG off-gas from the plant and separates out the CS and heavier components for fuel blending. The amine unit absorbs hydrogen sulfide and sends it to the sulfur

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recovery unit to make elemental sulfur, which is then sold.

I asked if there had been any changes or modifications to the refinery since the last inspection on July 26, 2018. Messrs. Warrick and Harper told me about the following changes/modifications:

- The facility was procuring two Rain-for-rent tanks for an upcoming project on the API slab
- The facility completed a September 2020 turn-around
- The facility's satellite control room was removed from the process area and a new control center was built outside the process area and finished in March 2021.

Building(s)

Building/Area	Process Description	Area of Concern
API slab	Central Accumulation Area (CAA)	No
Surface Impoundment Building	CAA	No
Fabrication Shop		Yes
Carpenter Shop		Yes
NE corner by insulator door	Satellite Accumulation Area (SAA)	Yes
Instrumentation and Electrical Shop		No
Mechanic Maintenance Shop		No
New Hazardous Waste Pad	CAA	Yes
SE corner of pad	Heat exchanger bundle cleaning area	Yes
Non-hazardous waste storage		No
Refinery Lab	Product quality, water quality lab	Yes
Lab storage supply room		Yes
Acids/Corrosives locker	SAA	Yes
Refinery Process Area		No
Warehouse		No

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

Building: Fabrication Shop	Contains CBI: No
Observation #: JJ1-OB-002	Date/Time: 04/26/2021
While inspecting the Fabrication Shop, I saw some work gloves in a trash receptacle. The work gloves looked like they were made with a combination of both man-made materials and leather parts. I explained to Messrs. Warrick and Harper that welding accessories, such as leather chaps and gloves, when tested by other facilities, using the Toxicity Characteristic Leaching Process (TCLP) testing method have been failing for chromium (D007). I asked if they knew how many pairs of leather gloves were provided to Tesoro employees each year and both gentlemen said they would need to check with the issuing department in the Warehouse. I told both gentlemen they may want to make a hazardous waste determination on the leather items issued/provided to Tesoro personnel. At the time this report was written, no information was provided to me by the facility regarding the	

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number of leather gloves that are issued/provided to Tesoro personnel.

Photo(s)

1. [Observation Image-202104261054505450326188.jpg](#)

Building: Fabrication Shop/Carpenter Shop	Contains CBI: No
Observation #: JJ1-OB-004	Date/Time: 04/26/2021
While inspecting the Carpenter Shop, I saw a one-gallon can of Rust-Oleum, oil-based coating that was on a work bench. I saw about one inch of paint in the bottom of the container that was more solid than liquid, and still exhibited a strong solvent odor. Mr. Warrick said that they just dry out the paint when the paint cans are "RCRA Empty", but he said this paint can didn't look "RCRA Empty." At the time of the inspection, the container was not closed and appeared to me to have been left open to evaporate and dry out. . There was not a hazardous waste, risk, or accumulation state date label on the paint can. I asked for a copy of the Safety Data Sheet (SDS) for the paint and was provided with a copy prior to departing the facility. According to the information contained within the SDS, the paint has a flash point of 40° C (104° F) and is ignitable (D001). Mr. Harper followed up with a response letter that was provided as an attachment in an email dated 05/06/2021. The waste paint identified in the Carpenter Shop was addressed with the following response: "The one-gallon (dry) oil-based paint can was removed and disposed of as a non-hazardous material. Discussions were had with the Fabrication Shop employees that paint cans need to be RCRA empty and dry before disposal."	
Photo(s)	
1. Observation Image-202104261127402740246218.jpg 2. Observation Image-202104261127512751282040.jpg 3. Observation Image-20210426112808288258566.jpg	

Building: Fabrication Shop/NE corner by insulator door	Contains CBI: No
Observation #: JJ1-OB-003	Date/Time: 04/26/2021
While in the Fabrication Shop, I saw a 55-gallon container located in the satellite accumulation area (SAA). According to Mr. Warrick, the facility manages the 55-gallon container as a hazardous waste SAA container to accumulate spent sandblast media. He said once full, it gets tested. While still in the Fabrication Shop, Messrs. Warrick and Harper took me over to the sandblast cabinet. There was a sandblast air filter system adjacent to the blast cabinet and beneath the filtering system I saw a 15-gallon container affixed to the sandblast air filter. Mr. Warrick said the 15-gallon container was also a SAA container. Mr. Warrick said that when full, the 15-gallon satellite container is emptied into the 55-gallon SAA container. At the time of the inspection, the 55-gallon container was in an area that was clearly delineated with yellow floor markings and signage indicating that it was a SAA. The hazardous waste marking on the container was also not marked with an accumulation start date which is indicative of being a SAA container. I asked Mr. Warrick when the last time was that the 55-gallon container was moved to the CAA. He told me that he would have to check and get back with me. Mr. Harper followed up with a response letter that was provided as an attachment in an email dated	

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05/06/2021. The waste sandblast media identified in the Fabrication Shop was addressed with the following response:

- 55-gallon drum removed from SAA to hazardous waste accumulation slab on 4/27/2021. Samples from both SAA drums were sent out for RCRA TCLP metals analysis on 4/27/2021 (**see photos 2a and 2a-2**).
- Small drum was checked for content volume. Only a small amount of powder was observed (**see photo 2b**).
- Total contents of both drums were less than 55 gallons.

Mr. Harper followed up with another email dated 05/14/2021. In that email Mr. Harper stated, "We have additional follow up to the Marathon Kenai Refinery April 26, 2021 RCRA Inspection. One of the items identified during the inspection and discussed during the close out meeting was two SAA drums of spent sandblast media in the fabrication shop. During the close out meeting we had decided to analyze the media in both drums to determine if the material was hazardous waste. We have received the results and have determined that none of the material is characteristic for RCRA metals. We have attached the results for your reference."

Photo(s)

1. [Observation Image-20210426110820820343944.jpg](#)
2. [Observation Image-20210426110945945306544.jpg](#)
3. [Observation Image-20210426111003103247394.jpg](#)
4. [Observation Image-202104261110201020246290.jpg](#)

Building: New Hazardous Waste Pad/SE corner of pad	Contains CBI: No
Observation #: JJ1-OB-006	Date/Time: 04/26/2021
While inspecting the Pad, I saw two heat exchanger bundles that, according to Messrs. Warrick and Harper, had been pressure washed to remove the solids. The solids removed from heat exchanger bundles are a K-listed (K050) waste. At the time of the inspection, I saw some waste debris and staining on the pad around the bundles which looked like it could have come off the heat exchanger bundles. Upon closer inspection, Mr. Warrick said the heat exchanger bundle on the right (toward center of pad) looked like the interior of the bundle had not been cleaned out. I asked Mr. Warrick about the volume of waste solids inside the heat exchanger bundle and he told me the volume of the material appeared to be about 10 gallons. I asked how long the heat exchanger bundles had been on the pad and Messrs. Warrick and Harper said the bundle cleaning crew cleaned them in September 2020 and that they had been on the pad since then. Mr. Harper followed up with a response letter that was provided as an attachment in an email dated 05/06/2021. The two heat exchanger bundles identified on the New Hazardous Waste Pad were addressed with the following response: • The bundles were moved, cleaned, and material on waste slab was removed and containerized on 4/28/2021(see photos 4a, 4a-2, 4a-3).	
Photo(s)	
1. Observation Image-20210426120720720368320.jpg 2. Observation Image-202104261207427421111520.jpg 3. Observation Image-202104261208168161228133.jpg	

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Building: Non-hazardous waste storage	Contains CBI: No
Observation #: JJ1-OB-005	Date/Time: 04/26/2021
While walking around the facility, we passed by an area where non-hazardous waste asphalt was being accumulated. I observed asphalt containers off their containment area and asphalt on ground. Mr. Harper followed up with a response letter that was provided as an attachment in an email dated 05/06/2021. The non-hazardous waste asphalt drums observed off containment and asphalt on ground was addressed with the following response: The non-hazardous waste was cleaned, and dripping asphalt containers were moved onto the waste slab to lined containment on 4/27/2021 (see photo 3a and 3a-2)	
Photo(s) Observation Image-20210426114907497413954.jpg Observation Image-2021042611493749371265659.jpg Observation Image-2021042611502050201297047.jpg	

Building: Refinery Lab/Lab storage supply room/Acids/Corrosives locker	Contains CBI: No
Observation #: JJ1-OB-001	Date/Time: 04/26/2021
While in the Refinery lab, I went to the lab storage supply room. While in the supply room, I opened an acid/corrosives locker to inspect the contents. While inspecting the contents of the locker I saw several containers that were labeled with the words "Used Chromerge" and both Toxic and Oxidizer hazard indicators. There were two, 2.5-liter containers and a smaller 1-liter container. At the time of the inspection, Mr. Phillip Carpenter, Lab Supervisor, said it's used as a cleaning agent. Upon closer inspection, I saw that only two of the three containers were marked as "Used Chromerge." The 1-liter container and one of the 2.5-liter containers were marked as "Used." According to one of the Lab Technicians, they mix up a batch of the Chromerge and then they use small amounts of it in certain lab equipment to clean certain internal sections of the equipment. According to the Lab technician I was speaking with, the Chromerge can be used multiple times until it becomes too dirty to use. That being the case, I was concerned about there being two containers of the used Chromerge in the acid/corrosives locker. My thought process being that one container might contain Chromerge that was still in-use and one might contain waste Chromerge. I asked for a copy of the SDS for the Chromerge and Mr. Carpenter provided a copy during the inspection. A cursory review of the SDS indicated that Chromerge contained 25 – 50% chromium (VI) trioxide (D007) with additional hazards including, oxidizer and corrosivity. Following the inspection, I sent an email to Mr. Harper requesting the following information: - List of each piece of lab equipment where Chromerge is used. - Provide any Chromerge mixing instructions or instructions for use. - Provide any lab standard operating procedures (SOP) in place for the use of Chromerge. - Provide frequency of use in the lab, how long the used Chromerge has been in the locker and the date it was last generated and shipped out. - If you find that it was previously disposed of in a Labpack, please include a copy of the disposal	

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paperwork.

Mr. Harper followed up with a response letter that was provided as an attachment in an email dated 05/06/2021. The containers of Chromerge observed in the lab storage supply room acid/corrosives locker were addressed with the following response:

- Chromerge solutions in storage room were relabeled for clarification on 4/29/2021 (**see photo 1c**).
 - o These solutions are still in use by the lab and are not considered a waste. The solution is used and transferred back into the bottles until such time that a lab technician has determined it is no longer effective.
 - o Chromerge is used in the following lab equipment: densitometers and Zeituchs Cross-Arm size 1-9 viscometer tubes and Ubbelohde size 50 & 100 viscometer tubes
 - o Chromerge mixing instructions are taken from the package labeling (**see photo 1d**)
 - o The Lab does not have a Standard Operating Procedure (SOP) specifically for Chromerge use. The file 'Viscosity, Cleaning and Verification' is the checklist for the yearly viscosity bath cleaning Process (attachment 4).
 - o Frequency of use in viscometers is once per year. Frequency in densitometers is "as-needed". The Lab does not have documentation for when the identified "used" Chromerge was put into use.
 - o We have no records of hazardous waste labpack Chromerge solution being disposed of in the last three years.

Photo(s)

1. [Observation Image-20210426100342342276262.jpg](#)
2. [Observation Image-2021042610050757294519.jpg](#)
3. [Observation Image-202104261018101810280188.jpg](#)

Records Review

Record: Inspections		AOC: No
Ref #: JJ1-RR-002	Reviewed By: Jon Jones	Reviewed Date: 06/29/2021
I reviewed the facility's weekly hazardous waste inspections while at the facility and identified a discrepancy with the date of an inspection. This was addressed by the facility following the inspection. Mr. Harper followed up with a response letter that was provided as an attachment in an email dated 05/06/2021 and included a copy of weekly inspection that contained wrong date and included annotation that it was for a different day (08/24/20) was addressed with the following response: This record request was received via email on April 27, 2021. The August 24, 2020 RCRA weekly inspection form has been included (attachment 1). Also included as attachment 2 is the August 24, 2020 email correspondence from Mr. Benjamin Taylor (contractor with Trihydro). This correspondence includes the original forms from the inspections conducted on the 24th (including the mis-dated weekly inspection form). Further investigation by the facility security officers indicate that Mr. Taylor was not onsite at the refinery on October 24, 2020 (a Saturday). Security officers confirmed there was no record in the electronic security system of Mr. Taylor entering the facility on that day. A copy of this inquiry has been included as attachment 3. I also observed during this document review that following the weekly inspection that occurred on 05/02/2019, the time of the inspection was no longer being documented on the weekly hazardous waste inspection logs. A copy of the 05/02/2019 weekly inspection log was provided, showing that the time of the inspection was documented on the inspection log and a copy of the 05/09/2019 weekly inspection log was provided, showing		

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that the time of the inspection was no longer being documented on the inspection log.

Document(s)

1. 5.2.19 weekly.pdf
2. 5.9.19 HW weekly.pdf

SECTION III – AREAS OF CONCERN

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

Building: Fabrication Shop Area: Sub-area:		
JJ1-OB-002		
While in the Fabrication Shop, I saw some gloves in the trash that may have contained leather parts. Leather gloves and welding accessories, made of leather, such as welding chaps, when tested, using the Toxicity Characteristic Leaching Process (TCLP) testing method have been failing for chromium (D007). At the time of the inspection, the facility had not made a hazardous waste determination.	Citation:	Section:
Building: Fabrication Shop Area: Carpenter Shop Sub-area:		
JJ1-OB-004		
While in the Carpenter Shop, I saw a one-gallon can of Rust-Oleum, oil-based coating that was on the work bench. At the time of the inspection, the container was not closed and appeared to be left open to evaporate and dry out. I observed the contents of the container and saw that it contained approximately one inch of waste paint in the bottom of the container and was not "RCRA Empty." Mr. Warrick stated , during the inspection, that the container was not "RCRA Empty."	Citation:	Section:

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Building: Fabrication Shop**Area:** NE corner by insulator door**Sub-area:****JJ1-OB-003**

Mr. Warrick said that when full, the 15-gallon satellite container of spend sandblast media is emptied into another 55-gallon SAA container of spent sandblast media.

Citation:**Section:****Building:** New hazardous waste pad**Area:** SE corner of pad**Sub-area:****JJ1-OB-006**

While inspecting the New hazardous waste pad, I saw two heat exchanger bundles that had been pressure washed to remove the solids (K050). At the time of the inspection, I saw this K050 waste on the pad around the bundles.

Mr. Warrick said the bundle on the right (toward center of pad) looked like the interior of the bundle had not been cleaned out. He said the bundle cleaning crew cleaned them in September 2020.

Citation:**Section:****Building:** Refinery Lab**Area:** Lab storage supply room**Sub-area:** Acids/Corrosives locker**JJ1-OB-001**

There were two, 2.5 liter containers and a smaller 1 liter container. Upon closer inspection, I saw that only two of the three containers were marked as "Used Chromerge." The 1-liter container and one of the 2.5-liter containers were marked as "Used." According to one of the Lab Technicians, they mix up a batch of the Chromerge and then they use small amounts of it in certain lab equipment to clean certain internal sections of the equipment. According to the

Citation:**Section:**

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Lab technician I was speaking with, the Chromerge can be used multiple times until it becomes too dirty to use. That being the case, I was concerned about there being two containers of the used Chromerge in the acid/corrosives locker. My thought process being that one container might contain Chromerge that was still in-use and one might contain waste Chromerge.		
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SECTION IV – FOLLOW UP

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

Closing Conference

I thanked everyone for their time and cooperation during the inspection and began a review of the areas of concern that I observed during my walk-through inspection and paperwork review while at the facility. I also explained the follow-up process that would take place after the inspection.

SECTION V – SAMPLING ACTIVITIES AND ANALYTICAL RESULTS

No sampling was conducted.

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

<i>[Title]</i> Observation_Image-202104261054505450326188.jpg 04/26/2021 10:54 AM (AKT) Jon Jones Fabrication Shop No CBI No PII View of waste gloves in the trash.	
<i>[Title]</i> Observation_Image-202104261127402740246218.jpg 04/26/2021 11:27 AM (AKT) Jon Jones Fabrication Shop/Carpenter Shop No CBI No PII View of a gallon can of Rust-Oleum, oil-based paint/coating that was on the work bench.	

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[Title]	
Observation_Image-202104261127512751282040.jpg	
04/26/2021 11:27 AM (AKT)	
Jon Jones	
Fabrication Shop/Carpenter Shop	
No CBI	
No PII	
Close-up view of the label on a gallon can of Rust-Oleum, oil-based paint/coating that was on the work bench.	

[Title]	
Observation_Image-20210426112808288258566.jpg	
04/26/2021 11:28 AM (AKT)	
Jon Jones	
Fabrication Shop/Carpenter Shop	
No CBI	
No PII	
Close-up view of a gallon can of Rust-Oleum, oil-based paint/coating that was on the work bench	

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[Title] Observation_Image-20210426110820820343944.jpg 04/26/2021 11:08 AM (AKT) Jon Jones Fabrication Shop/NE corner by insulator door No CBI No PII View of a 15-gallon satellite accumulation container that was being used to accumulate waste sandblast media.	
[Title] Observation_Image-20210426110945945306544.jpg 04/26/2021 11:09 AM (AKT) Jon Jones Fabrication Shop/NE corner by insulator door No CBI No PII View of a 55-gallon SAA container, holding waste sandblast media, in the SAA of the Fabrication Shop.	

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[Title]	
Observation_Image-20210426111003103247394.jpg	
04/26/2021 11:10 AM (AKT)	
Jon Jones	
Fabrication Shop/NE corner by insulator door	
No CBI	
No PII	
Close-up (Blurry) view of the label on the 55-gallon SAA container of waste sandblast media.	

[Title]	
Observation_Image-202104261110201020246290.jpg	
04/26/2021 11:10 AM (AKT)	
Jon Jones	
Fabrication Shop/NE corner by insulator door	
No CBI	
No PII	
Another close-up view of the label on the 55-gallon SAA container of waste sandblast media.	

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[Title]
Observation_Image-20210426100342342276262.jpg
04/26/2021 10:03 AM (AKT)
Jon Jones
Lab storage supply room/Acids/Corrosives locker
No CBI
No PII
View of the three containers holding Chromerge. Seen in the photo here is a 1-Liter bottle of "Used Chromerge" in the back, a 2.5-Liter bottle of Chromerge in the middle, and another 2.5-Liter bottle of "Used Chromerge" seen in the front.



[Title]
Observation_Image-2021042610050757294519.jpg
04/26/2021 10:05 AM (AKT)
Jon Jones
Lab storage supply room/Acids/Corrosives locker
No CBI
No PII
This is another view showing a 1-Liter bottle of "Used Chromerge" in the back, a 2.5-Liter bottle of Chromerge on the right, and another 2.5-Liter bottle of "Used Chromerge" seen on the left.



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[Title]

Observation_Image-
202104261018101810280188.jpg

04/26/2021 10:18 AM (AKT)

Jon Jones

Lab storage supply room/Acids/Corrosives
locker

No CBI

No PII

This is another view showing the labeling on a 1-Liter bottle of "Used Chromerge" in the back, a 2.5-Liter bottle of Chromerge on the right, and another 2.5-Liter bottle of "Used Chromerge" seen on the left.



[Title]

Observation_Image-
20210426120720720368320.jpg

04/26/2021 12:07 PM (AKT)

Jon Jones

New hazardous waste CAA pad/SE corner of
pad

No CBI

No PII

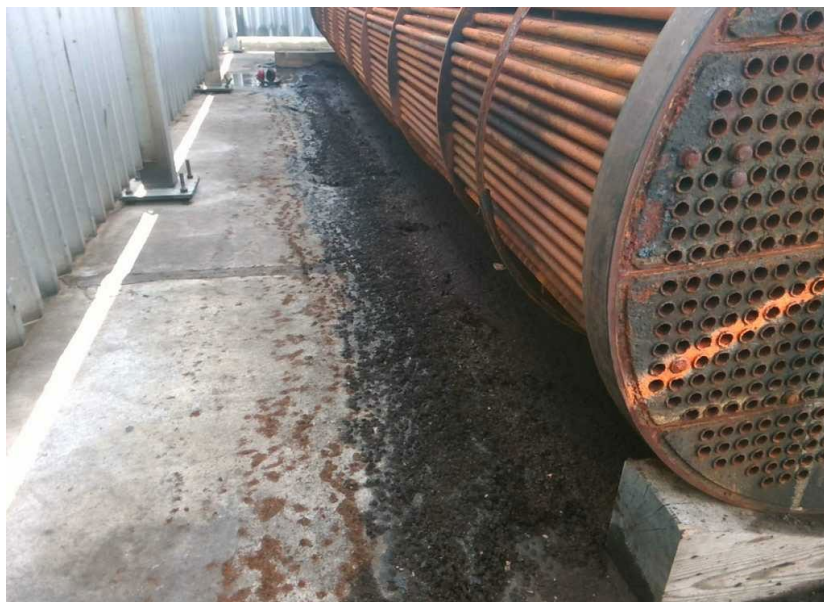
View of two heat exchanger bundles as well as debris and staining on the pad around the bundles.



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[Title]
Observation_Image-202104261207427421111520.jpg
04/26/2021 12:07 PM (AKT)
Jon Jones
New hazardous waste CAA pad/SE corner of pad
No CBI
No PII
Close-up view of the debris on the pad around the heat exchanger bundles.



[Title]
Observation_Image-202104261208168161228133.jpg
04/26/2021 12:08 PM (AKT)
Jon Jones
New hazardous waste CAA pad/SE corner of pad
No CBI
No PII
Another view of two heat exchanger bundles.



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[Title]	
Observation_Image-20210426114907497413954.jpg	
04/26/2021 11:49 AM (AKT)	
Jon Jones	
Non-hazardous waste storage	
No CBI	
No PII	
Non-hazardous waste asphalt seen here on the left in the photo.	
[Title]	
Observation_Image-2021042611493749371265659.jpg	
04/26/2021 11:49 AM (AKT)	
Jon Jones	
Non-hazardous waste storage	
No CBI	
No PII	
Close-up view of the Non-hazardous waste asphalt.	

Inspection Date(s):

04/26/2021 - 04/26/2021

[Title]	
Observation_Image-2021042611502050201297047.jpg	
04/26/2021 11:50 AM (AKT)	
Jon Jones	
Non-hazardous waste storage	
No CBI	
No PII	
Another view of the Non-hazardous waste asphalt.	

Document Log

Document Type	Document Name	Contains CBI	Contains PII	Uploaded By	Date Received
Inspection Reports	Field_Notes_AKD048679682v1.0.pdf	No	No	Jon Jones	06/29/2021
Other - Safety Data Sheet	Pro QT 2PK Safety Yellow SDS.pdf	No	No	Jon Jones	06/29/2021
Other - Safety Data Sheet	Chromerge SDS.pdf	No	No	Jon Jones	06/29/2021
Records Review	ERP and quick reference guide.pdf	No	No	Jon Jones	06/29/2021
Records Review	5.2.19 weekly.pdf	No	No	Jon Jones	06/29/2021
Records Review	5.9.19 HW weekly.pdf	No	No	Jon Jones	06/29/2021
Records Review	Marathon Kenai Refinery Waste Mgmt Plan.pdf	No	No	Jon Jones	06/29/2021
Communications	Att 1 8-24-20 Weekly RCRA Form.pdf	No	No	Jon Jones	06/29/2021
Communications	Att 3 - Security.pdf	No	No	Jon Jones	06/29/2021
Communications	Att 4 - Viscosity Cleaning and Verification.xlsx	No	No	Jon Jones	06/29/2021
Communications	Response to EPA Inspection 4-26-2021.pdf	No	No	Jon Jones	06/29/2021
Communications	Email from Mike.pdf	No	No	Jon Jones	06/29/2021
Communications	Fab Shop Sandbust Sand Waste Determination.pdf	No	No	Jon Jones	06/29/2021