

EPA REGION 10 Enforcement Division

INSPECTION REPORT

Inspection Entry Date/Time	07/10/2023 09:40 AM (AKT)	Announced: No	
Inspection Exit Date/Time	07/12/2023 09:25 AM (AKT)	Access: Granted	
Regulatory Program	RCRA		
Type of Inspection	Compliance Evaluation Inspection (CEI)		
Company Name	Hilcorp North Slope, LLC		
Facility or Site Name	Hilcorp North Slope Prudhoe Bay Unit		
Facility/Site Identifier	AKD000643239		
Facility/Site Physical Address	Prudhoe Bay Unit		
City, State, Zip Code	Prudhoe Bay, AK 99734		
County/Borough	North Slope Borough		
Generator Status	Large Quantity Generator and Permitted TSDF		
NAICS	211120		
Type of Operation	Crude oil production field		
Geographic Coordinates	70.293892, -148.704274		
Mailing Address/Secondary Address	Ms. Amy Peloza, Environmental Team Manager - Kenai and NS Field Teams 3800 Centerpoint Drive, Suite 1400 Anchorage, AK 99503 apeloza@hilcorp.com CC: Matt Laskey/Vic Farris AlaskaNS-PB-WasteCoord@hilcorp.com Shane Umatum /Jeff Shannon AlaskaNS-PB-WasteTech@hilcorp.com		
City, State, Zip Code	Anchorage, AK 99503		
Permit Number (If Applicable)	AKD000643239		
Lead Inspector:			
Jon Jones	JONATHAN JONES	Digitally signed by JONATHAN JONES Date: 2023.08.22 09:38:37 -08'00'	
	EPA Region 10	Jones.Jon@epa.gov	(907) 271-6329
Supervisor Review:			
Matt Quarterman	MATTHEW QUARTERMAN	Digitally signed by MATTHEW QUARTERMAN Date: 2023.08.22 12:21:22 -07'00'	
	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 Hilcorp North Slope Prudhoe Bay Unit Facility (the “Site” or “Facility”), located at Prudhoe Bay Unit, Prudhoe Bay, AK 99734, at 09:40 AM (AKT) on 07/10/2023 for an unannounced inspection. EPA Region 10 Lead Inspector presented credentials to and informed Matt Laskey that this was an EPA Region 10 inspection to determine compliance with Resource Conservation and Recovery Act (RCRA).

This was a Resource Conservation and Recovery Act (RCRA) inspection. The facility was inspected to ensure compliance with the facility’s RCRA permit, as well as the 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 2023.

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

Attendees

Title/Organization	Name	Phone	Email	Opening Conf.	Closing Conf.
Lead Inspector/EPA REGION 10	Jon Jones	(907) 271-6329	Jones.Jon@epa.gov	Yes	Yes
RCRA Inspector/EPA Region 10	Matt Quarterman	(206) 553-2146	quarterman.matthew@epa.gov	No	Yes
RCRA Inspector-in-training/Alaska Department of Environmental Conservation (ADEC)	Alan Pefley	(907) 269-4567	pefley.alan@alaska.gov	No	Yes
Environmental Team Manager - Kenai and North Slope Field Teams/Hilcorp Alaska, LLC	Amy Peloza	(907) 777-8348	apeloza@hilcorp.com	No	Yes
Alaska North Slope-Prudhoe Bay-Waste	Shane Umatum	(907) 659-4705	AlaskaNS-PB-WasteTech@hilcorp.com	Yes	Yes

Technician/Hilcorp North Slope Prudhoe Bay Unit					
Hazardous Waste Coordinator/Hilcorp North Slope Prudhoe Bay Unit	Matt Laskey	(907) 659- 4810	AlaskaNS-PB- WasteCoord@hilcorp.com	Yes	Yes
Environmental Health and Safety Director/Hilcorp Alaska, LLC	Laura Green			No	Yes
Operations Manager, PBU Power and Gas/Hilcorp North Slope Prudhoe Bay Unit	Tim Johnson			No	Yes
Operations Manager, PBU East/Hilcorp North Slope Prudhoe Bay Unit	Bo York			No	Yes

Opening Conference

We arrived at the Facility on 06/16/2021 for the inspection. I presented my credentials to Mr. Matt Laskey 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 Information

According to facility personnel, the Hilcorp North Slope Prudhoe Bay Unit operates North Slope oil fields and pipelines with a gross production rate of approximately 520,000 barrels of oil equivalent per day. The Prudhoe Bay Unit consists of a West Operating Area and an East Operating Area. These areas have Satellite Accumulation Areas for hazardous wastes, non-hazardous wastes, universal wastes, and recyclable materials. A list of these SAA/UAA/RAA locations is included in the document log.

What type of generator facility verified as?	Large Quantity Generator verified by Matt Laskey
What type of generator facility notified?	Large Quantity Generator (LQG)

Size of Facility	213,543 acres
Safety Training Provided to Inspector(s)?	No
Operating Hours	24/7/365
Length of Facility at Location	Since the 1960's
Weather Conditions	Day 1 – Partly cloudy, Day 2 – Sunny, Day 3 – Cloudy and raining

Process Description

The Hilcorp North Slope Prudhoe Bay Unit is a Large Quantity Generator (LQG) of hazardous waste, a large quantity handler of universal waste, and a permitted hazardous waste storage facility. The facility is not a commercial storage facility; the permit was issued so that Hilcorp could store the waste they generate for more than 90 days. The Facility's standardized RCRA permit went into effect on September 30, 2021, and shall remain in effect through September 29, 2031.

According to Mr. Laskey, there have been no significant changes at the facility since the June 2021 RCRA inspection.

Building(s)

Building/Area/Sub-area	Process Description	Area of Concern
Comm Center	SAA	No
Drill Site L4	SAA	No
Flow Station 2	SAA	Yes
SAA		Yes
Flow Station 3		Yes
SAA		Yes
Mod 4924		Yes
Mod 4944		Yes
Weld Shop	SAA	Yes
Gathering Center 3 (GC3)		No
Skid 7	Maintenance Mod	No
GC 2	SAA	No
Grind and Inject (G&I)	SAA	No
Hazardous Waste Process Facility (HWPF)	This is the facility's permitted hazardous waste storage building.	No
Hover craft hangar	Houses hover craft for transportation to Northstar, another Hilcorp production facility.	No
SAA		No
L Pad	SAA	Yes
Innovation Rig	Drill Rig	Yes
Prudhoe Bay Operations Center		No

A209 Safety Instrumentation	SAA	No
STP		Yes
4921 Drive thru	SAA	Yes
Z Pad	SAA	No

SECTION II – OBSERVATIONS

Building: STP/4921 Drive thru			
Observation #: JJ1-OB-001	Date: 07/10/2023	Contains AOC: Yes	Contains CBI: No
Person Interviewed: Bret Lambert		Title: Operations Lead	
At the time of inspection, we saw a 15-gallon SAA container of waste solvent rags that was not marked with a hazard indicator that was specific to the hazard. The container was marked with a DOT Class 9 label. Hazard indicators are required to be specific to the hazard and a DOT Class 9 label does not meet this requirement. The word “TOXIC” was added to the label during the inspection.			
Photo(s) 1. IMG-20230710111224122469308.jpg 2. IMG-20230710111610161073126.jpg 3. IMG-20230710111852185271812.jpg			

Building: Flow Station 2			
Observation #: JJ1-OB-005	Date: 07/10/2023	Contains AOC: Yes	Contains CBI: No
Person Interviewed: Shane Umatum		Title: Alaska NS-Prudhoe Bay-Waste Technician	
While checking-in with the Operator at Flow Station 2, we saw a battery on a counter that was marked with the word “BAD.” The battery was verified by facility personnel to be a waste battery. The facility manages their waste batteries as universal waste. At the time of the inspection, the battery was not labeled with either the phrase “Universal Waste – Battery,” “Waste Battery,” or “Used Battery.” Mr. Umatum took the waste battery to the Flow Station 2 SAA and placed it into the designated universal waste container for waste batteries.			
Photo(s) 1. IMG-20230710144630463059575.jpg 2. IMG-20230710144636463680218.jpg			

Building: Flow Station 2/SAA			
Observation #: JJ1-OB-006	Date: 07/10/2023	Contains AOC: Yes	Contains CBI: No
Person Interviewed: Shane Umatum		Title: Alaska NS-Prudhoe Bay-Waste Technician	
At the time of inspection, we saw a 15-gallon SAA container of waste solvent rags that was not marked with an appropriate hazard indicator. The container was marked with a DOT Class 9 label. Hazard indicators are required to be specific to the hazard and a DOT Class 9 label does not meet this requirement. The word “TOXIC” was added to the label during the inspection.			

Photo(s)

1. [IMG-20230710144944494469634.jpg](#)
2. [IMG-20230710145221522162477.jpg](#)

Building: L Pad/Innovation Rig

Observation #: JJ1-OB-009 **Date:** 07/11/2023 **Contains AOC:** Yes **Contains CBI:** No

Person Interviewed: Shane Umatum **Title:** Alaska NS-Prudhoe Bay-Waste Technician

At the time of inspection, we saw a 55-gallon SAA container of waste glycol that was not marked with an appropriate hazard indicator. The container was marked with a DOT Class 9 label. Hazard indicators are required to be specific to the hazard and a DOT Class 9 label does not meet this requirement.

The word "TOXIC" was added to the label during the inspection.

Photo(s)

1. [IMG-20230711091114111478049.jpg](#)
2. [IMG-20230711091233123387851.jpg](#)
3. [IMG-20230711091243124392769.jpg](#)
4. [IMG-20230711091251125192111.jpg](#)

Building: Flow Station 3/SAA/Mod 4924

Observation #: JJ1-OB-013 **Date:** 07/11/2023 **Contains AOC:** Yes **Contains CBI:** No

Person Interviewed: Shane Umatum **Title:** Waste Technician

At the time of inspection, we saw a 15-gallon SAA container of waste solvent rags that was not marked with an appropriate hazard indicator. The container was marked with a DOT Class 9 label. Hazard indicators are required to be specific to the hazard and a DOT Class 9 label does not meet this requirement.

The word "TOXIC" was added to the label during the inspection.

Photo(s)

1. [IMG-20230711132714271484626.jpg](#)
2. [IMG-20230711132816281684552.jpg](#)

Building: Flow Station 3/SAA/Mod 4944

Observation #: JJ1-OB-014 **Date:** 07/11/2023 **Contains AOC:** Yes **Contains CBI:** No

Person Interviewed: Shane Umatum **Title:** Waste Technician

At the time of inspection, we saw a 15-gallon SAA container of waste solvent rags that was not marked with an appropriate hazard indicator. The container was marked with a DOT Class 9 label. Hazard indicators are required to be specific to the hazard and a DOT Class 9 label does not meet this requirement.

The word "TOXIC" was added to the label during the inspection.

Photo(s)

1. [IMG-20230711134450445082200.jpg](#)
2. [IMG-20230711134520452088409.jpg](#)

Building: Hazardous Waste Process Facility (HWPf)			
Observation #: JJ1-OB-015	Date: 07/11/2023	Contains AOC: No	Contains CBI: No
Person Interviewed: Matt Laskey		Title: Waste Coordinator	
The areas of the floor in the HWPf that were observed during the last inspection as areas where the floor sealant was damaged and identified as an area of concern had been repaired since the last inspection.			
Photo(s) 1. IMG-20230711143823382395998.jpg 2. IMG-20230711143830383085256.jpg 3. IMG-20230711143836383679560.jpg 4. IMG-20230711143852385285412.jpg			

Building: Hilcorp North Slope Prudhoe Bay Unit			
Observation #: JJ1-OB-016	Date: 07/12/2023	Contains AOC: Yes	Contains CBI: No
Person Interviewed: Amy Peloza		Title: Environmental Team Manager - Kenai and North Slope Field Teams	
During the closing conference on 7/12/23, I told Ms. Peloza that I had seen her facility's latest correspondence, with Ms. Xiangyu Chu, EPA, regarding the Hilcorp waste determination for waste leather gloves. In the facility's waste determination, Ms. Peloza stated that those waste leather gloves contaminated with hazardous waste would be managed as hazardous waste and those waste leather gloves contaminated with oily waste would be managed with the oily waste as non-hazardous waste. I asked Ms. Peloza if they were currently managing the waste leather gloves in this manner, and she said they were. I told Ms. Peloza that I had not seen any SAA containers that were being used to accumulate the waste leather gloves that were contaminated with hazardous waste. Ms. Peloza told me that the waste leather gloves that were contaminated with hazardous waste were being managed in the SAA containers that held waste solvent rags. The facility's oily waste is being managed as a solid waste and is being disposed of at the Oxbow Landfill. The oily waste at the facility is currently being double bagged and loaded into roll-off boxes that have a capacity of ~27 cubic yards. Following the Hilcorp inspection on 7/12/23, I conducted a RCRA inspection at the Oxbow Landfill on the same day (7/12/23). The Oxbow Landfill is owned by the North Slope Borough and operated by Ice Services. During the inspection of the landfill, I spoke with the Ice Services Landfill Supervisor about the oily waste coming from Hilcorp. I was walked through the management process for the oily waste and told that landfill personnel sort through all of the oily waste bags that come into their facility. According to the Landfill Supervisor, they receive oily waste bags that either contain very little oily waste or some that are contaminated with oily waste. The bags that appear to contain little to no oily waste contamination are removed and placed into another roll-off container and then buried in the landfill. Those bags that appear to be contaminated with varying amounts of oil waste are placed into ~1.7 cubic yard boxes. Bags that contain excess oily waste liquids are poured into a container and absorbent pads/boom are added to absorb the liquids. The waste is bagged again and placed into the 1.7 cu yd boxes. According to the Landfill Supervisor, approximately 50% of the oily waste is buried in the landfill and the other 50% is sent down to Waste to Energy facility in Spokane, WA for incineration. I asked both the Landfill Operator and Landfill Supervisor if they were seeing leather gloves in bags of oily waste that come into their facility and they told me they were. I asked the Landfill Supervisor how many they were seeing			

each month and I was told they were seeing at least 50 to 100 leather gloves a month.

EPA views waste leather gloves as a potential, hazardous waste and generators of waste leather gloves are finding that this waste fails TCLP for chromium. At the time of the inspection, Hilcorp NS PBU was sending unmanifested waste leather gloves to an out-of-state, unpermitted incinerator via an unpermitted local disposal facility.

SECTION III – RECORDS REVIEW

Record: Others		AOC: Yes
Ref #: JJ1-RR-001	Reviewed By: Jon Jones	Reviewed Date: 07/28/2023
At the time of the inspection, I asked for records related to the procurement of leather gloves that were purchased by the facility since the last RCRA compliance inspection on 6/16-17/2021. The facility provided this information in an email, dated 7/26/2023. The spreadsheet provided by the facility lists both the type and number of gloves purchased. During my review of the spreadsheet, I highlighted those gloves that were either all leather or were comprised of other materials that included a leather palm. A review of the items on the spreadsheet showed that 4,182 pairs of gloves had been procured between 6/16/2021 and 7/12/2023. According to Ms. Peloza, waste leather gloves generated at the facility are managed as both hazardous waste in the waste solvent rag waste stream and as oily waste which is managed as solid waste. The facility's oily waste is disposed of at the Oxbow Landfill where they sorted, based on the degree of oily waste contamination, and either buried in the landfill or shipped to an Incinerator in Spokane, WA. Neither the Oxbow Landfill, in Prudhoe Bay, nor the Incinerator in Spokane, WA. are permitted hazardous waste disposal facilities.		
Document(s) 1. Stock Leather Gloves 07.17.2023.pdf		
Record: List of Waste Streams or Waste Stream tracking documents		AOC: Yes
Ref #: JJ1-RR-002	Reviewed By: Jon Jones	Reviewed Date: 07/28/2023
During the inspection, I asked for a list of the SAAs where the facility's waste solvent rags were being generated. The list of waste solvent rag SAAs was provided in an email, dated 7/26/2023. After reviewing the list, I saw that there were a total of 38 SAAs where the waste solvents rags were being accumulated. According to Mr. Umatum, all of these satellite accumulation containers were marked with a Class 9 DOT label for a hazard indicator. I explained during the inspection that the Class 9 DOT label was not specific to the hazard. Several of these SAAs were inspected on 7/10/2023 and Mr. Umatum added a label to each of the waste solvent rag containers that included the word "TOXIC." On 7/11/2023 while inspecting another waste solvent rag SAA, I saw that the container had been marked with the word "TOXIC" as the hazard indicator. I asked Mr. Umatum about the marking, and he explained that after the first day of the inspection, he went to the remaining SAAs and applied the "TOXIC" hazard indicator to the remaining containers.		
Document(s) 1. PB Solvent Rag SAA Locations.pdf		

SECTION IV – AREA OF CONCERN

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

Building: STP	Area: 4921 Drive thru	Sub-area:
JJ1-OB-001		
At the time of inspection, there was a 15-gallon SAA container of waste solvent rags that was marked with a hazard indicator that was not specific to the hazard. The container was marked with a DOT Class 9 label.	Citations:	Sections:
Building: Flow Station 2	Area:	Sub-area:
JJ1-OB-005		
A waste battery was observed on a countertop, just outside the control room, marked with the word "BAD.". At the time of the inspection, the battery was not labeled with either the phrase "Universal Waste – Battery," "Waste Battery," or "Used Battery."	Citations:	Sections:
Building: Flow Station 2	Area: SAA	Sub-area:
JJ1-OB-006		
An SAA container was not marked with a hazard indicator that was specific to the hazard. The container was marked with a DOT Class 9 label.	Citations:	Sections:
Building: L Pad	Area: Innovation Rig	Sub-area:
JJ1-OB-009		
A 55-gallon SAA container of waste glycol was not marked with a hazard indicator that was specific to the hazard. The container was marked with a DOT Class 9 label.	Citations:	Sections:
Building: Flow Station 3	Area: SAA	Sub-area: Mod 4924
JJ1-OB-013		
At the time of inspection, there was a 15-gallon SAA container of waste solvent rags that was marked with a hazard indicator that was not specific to the hazard. The container	Citations:	Sections:

was marked with a DOT Class 9 label.		
Building: Flow Station 3	Area: SAA	Sub-area: Mod 4944
JJ1-OB-014		
At the time of inspection, there was a 15-gallon SAA container of waste solvent rags that was marked with a hazard indicator that was not specific to the hazard. The container was marked with a DOT Class 9 label.	Citations:	Sections:
Building: Hilcorp North Slope Prudhoe Bay Unit	Area:	Sub-area:
JJ1-OB-016		
At the time of the inspection, Hilcorp NS PBU was sending oily waste, with waste leather gloves, to the NSB Oxbow Landfill, an unpermitted local disposal facility.	Citations:	Sections:

SECTION V – CLOSING CONFERENCE AND FOLLOW UP

Closing Conference

At the conclusion of the inspection, we conducted a closing conference that was attended by those listed in the Attendees table, in Section I of this report. We thanked everyone for their time and cooperation during the inspection and began a review of the areas of concern (listed in Section III – Areas of Concern) that we observed during the inspection of the 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.

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-20230710111224122469308.jpg
07/10/2023 11:12 AM (AKT)	No CBI	No PII	Photographer: Jon Jones
STP/4921 Drive thru			70.41267029, -148.53119565
View of a 15-gallon SAA container of solvent rags that is not marked with a hazard indicator that is specific to the hazard. The container seen here is marked with a DOT Class 9 label.			



[Title]			IMG-20230710111610161073126.jpg
07/10/2023 11:16 AM (AKT)	No CBI	No PII	Photographer: Jon Jones
STP/4921 Drive thru			70.41266399, -148.53120676
Close-up view of the hazardous waste label.			



[Title]			IMG-20230710111852185271812.jpg
07/10/2023 11:18 AM (AKT)	No CBI	No PII	Photographer: Jon Jones
STP/4921 Drive thru			70.41269969, -148.53122561
Close-up view of the hazardous waste label, after the word "TOXIC" was added for a hazard indicator.			



[Title]			IMG-20230710144630463059575.jpg
07/10/2023 02:46 PM (AKT)	No CBI	No PII	Photographer: Jon Jones
Flow Station 2			70.26610757, -148.33380998
View of a waste battery that is marked as "BAD" and not labeled with either the phrase "Universal Waste - Battery," "Waste - Battery," or "Used Battery."			



[Title]			IMG-20230710144636463680218.jpg
07/10/2023 02:46 PM (AKT)	No CBI	No PII	Photographer: Jon Jones
Flow Station 2			70.26613564, -148.33376921
Close-up view of the waste battery that is marked as "BAD" and not labeled with either the phrase "Universal Waste - Battery," "Waste - Battery," or "Used Battery."			



[Title]			IMG-20230710144944494469634.jpg
07/10/2023 02:49 PM (AKT)	No CBI	No PII	Photographer: Jon Jones
Flow Station 2/SAA			70.26624194, -148.33393027
View of a SAA container of waste solvent rags that is not marked with a hazard indicator that is specific to the hazard. The container seen here is marked with a DOT Class 9 label.			



[Title]			IMG-20230710145221522162477.jpg
07/10/2023 02:52 PM (AKT)	No CBI	No PII	Photographer: Jon Jones
Flow Station 2/SAA			70.26620007, -148.33388776
View of the SAA container of waste solvent rags after being marked with the word "TOXIC" for the hazard indicator.			



[Title]			IMG-20230711091114111478049.jpg
07/11/2023 09:11 AM (AKT)	No CBI	No PII	Photographer: Jon Jones
L Pad/Innovation Rig			70.35024693, -149.33210353
View of a SAA container of waste solvent rags that is marked with the word "TOXIC." The container was marked at some point following the first day of the inspection (7/10/23) and the beginning of the inspection on the second day (7/11/23).			



[Title]			IMG-20230711091233123387851.jpg
07/11/2023 09:12 AM (AKT)	No CBI	No PII	Photographer: Jon Jones
L Pad/Innovation Rig			70.3497863, -149.33066522
View of a 55-gallon SAA container of waste glycol that is not marked with a hazard indicator that is specific to the waste.			



[Title]			IMG-20230711091243124392769.jpg
07/11/2023 09:12 AM (AKT)	No CBI	No PII	Photographer: Jon Jones
L Pad/Innovation Rig			70.3500311, -149.33304511
Close-up view of the same 55-gallon SAA container of waste glycol that is not marked with a hazard indicator that is specific to the hazard.			



[Title]			IMG-20230711091251125192111.jpg
07/11/2023 09:12 AM (AKT)	No CBI	No PII	Photographer: Jon Jones
L Pad/Innovation Rig			70.35009127, -149.33202664
Another close-up view of the same 55-gallon SAA container of waste glycol after being marked with the word "TOXIC" for the hazard indicator.			



[Title]			IMG-20230711132714271484626.jpg
07/11/2023 01:27 PM (AKT)	No CBI	No PII	Photographer: Jon Jones
Flow Station 3/SAA			70.25485376, -148.57487848
View of a SAA step-can of waste solvent rags that is not marked with a hazard indicator that is specific to the hazard.			



[Title]			IMG-20230711132816281684552.jpg
07/11/2023 01:28 PM (AKT)	No CBI	No PII	Photographer: Jon Jones
Flow Station 3/SAA			70.25496462, -148.57475465
View of the step-can after being marked with the word "TOXIC" for the hazard indicator.			



[Title]			IMG-20230711134450445082200.jpg
07/11/2023 01:44 PM (AKT)	No CBI	No PII	Photographer: Jon Jones
Flow Station 3/SAA			70.25481702, -148.57282977
View of a SAA step-can of waste solvent rags that is not marked with a hazard indicator that is specific to the hazard.			



[Title]			IMG-20230711134520452088409.jpg
07/11/2023 01:45 PM (AKT)	No CBI	No PII	Photographer: Jon Jones
Flow Station 3/SAA			70.25484075, -148.57265071
View of the step-can after being marked with the word "TOXIC" for the hazard indicator.			



[Title]			IMG-20230711143823382395998.jpg
07/11/2023 02:38 PM (AKT)	No CBI	No PII	Photographer: Jon Jones
Hazardous Waste Process Facility (HWPf)			70.2909124, -148.69759435
View of the HWPf floor, showing the repairs that were made since the previous inspection.			



[Title]			IMG-20230711143830383085256.jpg
07/11/2023 02:38 PM (AKT)	No CBI	No PII	Photographer: Jon Jones
Hazardous Waste Process Facility (HWPf)			70.2909123, -148.69759427
View of the HWPf floor, showing the repairs that were made since the previous inspection.			



[Title]			IMG-20230711143836383679560.jpg
07/11/2023 02:38 PM (AKT)	No CBI	No PII	Photographer: Jon Jones
Hazardous Waste Process Facility (HWPf)			70.29089756, -148.69753081
View of the HWPf floor, showing the repairs that were made since the previous inspection.			



[Title]			IMG-20230711143852385285412.jpg
07/11/2023 02:38 PM (AKT)	No CBI	No PII	Photographer: Jon Jones
Hazardous Waste Process Facility (HWPF)			70.29091415, -148.69759556
View of the HWPF floor, showing the repairs that were made since the previous inspection.			

APPENDIX 2: DOCUMENT LOG

Document Type	Document Name	Contains CBI	Contains PII	Uploaded By	Date Received
Records Review	Stock Leather Gloves 07.17.2023.pdf	No	No	Jon Jones	07/28/2023
Records Review	PB Solvent Rag SAA Locations.pdf	No	No	Jon Jones	07/28/2023
Contingency Plan	AK-HSE-DOC-00120-4_PBU RCRA Contingency Plan.pdf	No	No	Jon Jones	07/28/2023
Personnel Training	DEEP Data base Prudhoe_Waste__SAA_Training_Report_as of 7.11.23.pdf	No	No	Jon Jones	07/28/2023
Personnel Training	FORMS Data Base Combined ENV Safety Portal Reports - Waste SAA Training as of 7.11.2023.pdf	No	No	Jon Jones	07/28/2023
Personnel Training	ISN Waste Handling - NMS - 2023.pdf	No	No	Jon Jones	07/28/2023
Records Review	PB Accumulation Area Inspection List (SAAs)	No	No	Jon Jones	07/28/2023
Records Review	Hilcorp PB SAA/UAA/OIC Data Sheet (Field Log)	No	No	Jon Jones	07/28/2023
Map	North Slope Overview NSB Service Area	No	No	Jon Jones	08/11/2023
Waste Disposal and Reuse Guide	Red Book October 2021	No	No	Jon Jones	08/11/2023
Records Review	Revised Solvent Rag SAA Locations	No	No	Jon Jones	08/06/2023