Personal notes file
2/23/88
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AK 741

Enforcement Confidential

Mapco Settlement Conference.

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FOIA exempt - related to settlement meetings

IMAGED

2/23/88.

Mapco Settlement:

final document - revised addressing

page 2

line 5 - 240 acres of land

line 16-18 - Feb 10, 1981. acquired

line 21. - site inspection - August 1986. site inspection
inaccurate report?
some inconsistence with what in report & actions taken
* why was no action taken earlier

page 3

line 7-8. - no way waste oil could be put into TAPS.
- TEL. material in drum. was cleanup material.
- 1978 - 79. date heat exchanger cleaner sludge removed.

line 14- - not aware of any drums put into wastewater lagoon.

line 19 - look at refinery as generator.
not TSD.
question on statement.
don't think permit application required.

page 4

line 1. - some of materials waiting to be used in process - new manager.
came in & may change.
used these materials March - ?
part of cleanup.
some of sent offsite

line 11 –

para c. – sodium hydroxide. – pH control on surface impoundment
hydrogen peroxide + methanol (used for freeze up control).
↓ oxygenate for surface impoundment
↓ gasoline tests. never put into system
not disposed of thru pump system.

page 5 – line 1-6. – c.

page 4. – line 16. caustic JP-4 drum. not ~~one~~ of product or disp drums

page 5. line 8. not sure what was intended with wording broad statement.

5 – para e. don't use Navy Brand safety solvent
showed up in sump sludge.

5 – para f – clay filters were on line. – membrane (black).
liner put in 1985?
previous time it was in drum.

5 – " g. – TEL was in storage inside.
spring –
Glen had a hard time finding place that would accept waste.

~~100 Kg.~~ don't believe had >1Kg. of waste.
has been shipped of site. 2 small 35 drums.
don't think had sufficient qty.
sat longer than 270 days.

page 6. j. - inspection not done in acc. with 262.

" para 10. - 1Kg. of TEL.
what constitutes >1000 Kg. of waste.

pg 6. line 24. ½ pint. of lab waste.

pg 6+7 para b. - sodium hydroxide can be used as pH. -
placement into sump was not for pH control.

pg 7. para c - leaks from sumps. not major contributor
sumps that leaked were repaired in 1983 + 1985.
mis characterization of picture. + not 1986.

sludge removed was not from these sumps.
not sure which sumps came from.

pg 7. lines 21+22 - don't know what the basis for this
statement is.

will not address specific allegations

pg 10 line 4. - what is meant by "release"
air, water, ground ?

- Reference to seven drum from sump.
  March 18, 1987. - drums were disposed of. as hazardous waste.
  < 270 days.
  Nov 86. - Glean started working on disposal.

Surface Impoundment - Fall 77. plant started

Clay filter - used in JP-4.
No tank cleanouts. -

wastewater treatment 2 ponds.

A lagoon. → B lagoon → eventually to North Pole.

have received pre-treatment permit.

lines patched in 1986. - sludge shipped as hazardous waste. (31 drums).

Tank T-192 - never been cleanup.
does not generate API seperator sludge.

1977 ~~78~~ - K050 generated by previous operator.
(was actually silts). and probably not K050.

Previous operator not generating hazardous waste.

whole issue of 1986. reports. - statements made.
concern. on how its used.

Compliance Order:

solvent never accumulated for 270
other wastes shipped off. <270.
believe <1Kg. of TEL.

agree to paying penalty.

like to retain generator standards. -

Section V.

1. a. - complete
b - "
c - complete
d - done
e - done.
f - ~~done~~ almost.
g - done.

2. - as generator must don.
3. - have submitted.
4 - not sure what that means
5 - not applicable.

3013

have gwm in place.
feel work under ADEC. - may constitute addressing
items 1+2.+3.

1.2 million worth of efforts.

going to re-do lagoon B.
enhanced oil recovery system. -
hired env. coordinator.
worked on contingency plan.
wastewater -
static head test for sumps.
septic systems
eliminated salt problem.
hazwaste program.
testing analysis of water + soils.
have 34. monitoring wells. -
8 downhole BTX. - for clean samples.
surveillance wells.
2 studies ~~of~~ on. subsurface. geology.
safety programs.

goals to remove oil + BTX. from groundwater

~~[illegible]~~

Response –

make facts more palatable. – redraft. for public eye.
clarify issues.

- carry out program without permit.
- well on way to carry out order.

- closure req'ts. – submit plan must. 270 / 264. standards.
review
implement

- conformation that by wastes + const have been removed.

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issues

- permitting
- interim status.

- tank, sumps, surface impoundment

closure plan amendments.

- surface imp. – sample + analyze.
sample + analyze – tank 192 – if show up clean tank
- sumps clean out. sample soils around sumps.

clean up around process unit in sump area may be impossible.

? would permitting process pre-empt closure process. -

? language on "what we are taking action on".

? Can write into purpose statement that purpose of order was to avoid a permit if facility doesn't want to be permitted.

Draft language on Consent order.
Must file extension. - request for extension
" " hearing without statement.

Penalty -
spending more money than anticipate.

generator - 22,500
TSD - 20,000
3 & 4 duplicative - 22,500
1st offer #67,500 -

Counter - 80,000

work on order. –

clean tanks.

inspect area. – around product area.

* plug – facility has option of continue work plan as laid out (subject to renegotiation of compliance schedule)

\+ expedited closure.

wanted to fight jurisdictional battle when permit called.