AK0701 4a
3/21/89

Alaska Department of Environmental Conservation
RCRA Compliance Evaluation Inspection Report

Facility Name:	MAPCO Alaska Petroleum Inc.
Identification Number:	AKD000850701
Facility Location & Mailing Address:	1100 H & H Lane North Pole, Alaska 99705
Facility Telephone #:	(907) 488-2741
Date of Inspection:	March 21, 1989
Inspector's Names/Titles:	Ron Lillich & Jeff Ingalls, 5/17/89 Environmental Field Officers Alaska Department of Environmental Conservation, Central Office Pouch O Juneau, Alaska 99811-1800 Telephone #: (907) 465-2671 Rich Cormack & Leslie Simmons, Environmental Field Officers Alaska Department of Environmental Conservation, Northern Regional Office Pouch 1601 Fairbanks, Alaska 99707-1601 Telephone #: (907) 452-1714

FILE COPY

Background and Compliance History:

MAPCO Alaska Petroleum Inc.(MAPI) operates a facility at North Pole, Alaska, which refines North Slope crude oil from the Trans-Alaska Pipeline System. Unused portions of the crude oil are returned to the pipeline. The facility is located on approximately 240 acres of land leased from the state of Alaska. MAPI is not classified by EPA as a State owned Treatment, Storage, and Disposal (TSD) facility.

On March 12, 1987, the facility submitted a Notification of Hazardous Waste Activity and received an identification number from the Environmental Protection Agency. A copy of the notification is attached in Appendix 1.

The facility has experienced many spills of various petroleum products since 1977. The DEC estimates that a total of more than 150,000 gallons of petroleum have been released to the environment as a result of these spills. In November 1986 DEC entered into a Compliance Order by Consent, directing that continued oil spill cleanup efforts be taken at the facility.

INGED

A RCRA non-notifier inspection was conducted at this facility by DEC on March 5, 1987. Numerous violations of the hazardous waste management violations were discovered. Due to the seriousness of some of these violations, a 3008(a) Complaint and Compliance Order was issued by EPA on January 27, 1988.

A RCRA Facility Assessment (RFA) was conducted at the facility by an EPA contractor. The visual site inspection was conducted by the contractor on July 20, 1988 with the assistance of the DEC. The draft RFA report provides a description of the Solid Waste Management Units identified in the course of the assessment and identifies additional areas of concern. Sixteen solid waste management units (swmu) and two areas of concern were identified and characterized. On November 29, 1988, DEC provided comments on the draft RFA report.

On January 6, 1989, the EPA and MAPI signed a Consent Agreement and Final Order resolving the 3008(a) Complaint and Compliance Order dated January 27, 1988. The facility agreed to come into compliance with the applicable hazardous waste management regulations and paid a $80,000 penalty. In addition, the facility signed an Administrative Order on Consent under Section 3008(h) of RCRA. The 3008(h) Order is to address any releases of hazardous constituents from the facility including the swmu's identified in the RFA.

The statement of purpose for the 3008(h) Consent Order include to provide for the performance of an Interim Measures program to remove hazardous waste constituents from the surface impoundment (Lagoon B), tank 192, and facility sumps numbers 901, 905, 909-b, and 05-7. It is also to provide for the performance of a RCRA Facility Investigation (RFI) for the facility and to provide for the performance of a Corrective Measures Study dependent upon and in accordance with whatever findings may be determined by the RFI.

The facility is considered by EPA to be a treatment, storage, and disposal facility under interim status because of past hazardous waste handling practices. Hazardous waste was disposed of in lagoon B and sumps 901, 905, 909b and 05-7. Because of this past management activity, the facility is regulated under the 40 CFR 265 interim status standards and certain of the 40 CFR 264 standards. However, the facility is not actively using any of its hazardous waste units including; Lagoon B, Tank 192, the boneyard waste storage area, and sumps 901, 905, 909b, and 05-7 for management of hazardous waste and has submitted closure plans for these processes. The facility considers itself only a generator of hazardous waste at this time and subject to the 40 CFR 262 generator standards. The 3008(a) order blends the 265 and 262 requirements for the facility.

The order requires that the facility submit within 30 days of the effective date of the order, January 6, 1989, a report to EPA describing those procedures and methods followed to assure

continued compliance with 40 CFR Part 262. The order requires that within 60 days of the effective date of the order, January 6, 1989, that for the waste storage area, Tank 192, applicable sumps, and the surface impoundments develop and implement a waste analysis plan as required by 40 CFR 265.13, develop and implement inspection procedures and recordkeeping as required by 40 CFR 265.15, develop and maintain operating records as required by 40 CFR 265.73, and demonstrate the facility's compliance with the applicable financial requirements of 40 CFR 265.142 and 265.143. The order also requires that within 90 days of the effective date of the order, January 6, 1989, that closure plans be submitted for the hazardous waste drum storage area, tank 192, the wastewater surface impoundment, and facility sumps Nos. 901, 905, 909-b, and 05-7. It also requires that the closure plan for the surface impoundment address the groundwater monitoring and corrective action standards in Subpart F of 40 CFR of 264.

Introduction and Record Review:

This was an unannounced RCRA Compliance Evaluation Inspection. Inspectors Ron Lillich and Jeff Ingalls of the Department of Environmental Conservation (DEC) Central Office accompanied by inspectors Rich Cormack and Leslie Simmons of the DEC Northern Regional Office arrived at the facility at approximately 9:30 am on March 21, 1989. We were referred to Kathleen McCullom Buscovich, environmental coordinator for MAPI, and to Gerald E. Fritz, General Manager of the MAPI facility. Mr. Lillich displayed his inspection credentials to Ms. Buscovich and Mr. Fritz and explained the purpose of the inspection. Later on in the inspection, David Rowse, Engineering Manager for MAPI, joined in on the inspection.

The first topic discussed was the regulatory status of the facility. It was the facility's position they were only a generator of hazardous wastes and should not be considered an interim status facility under RCRA. However, it was DEC's position that even though the hazardous waste units (ie.lagoon B, Tank 192, the boneyard waste storage area, and sumps 901, 905, 909b and 05-7) were not being actively used for hazardous waste management activities that the facility had used these units in the past and would be considered an interim status facility until these units could possibly be clean closed. Therefore, it was DEC's position that the facility would be inspected under the interim status standards of 40 CFR Part 265 and the equivalent State standards. We also informed the facility that we would discuss the State's interpretation of their regulatory status with EPA after the inspection. After review of the Final Order and the Consent Agreement and a discussion with Bill Adams of EPA Region 10, it was concluded that the facility should be looked at as a generator and not a treatment, storage, or disposal facility (TSD) .

The facility was then asked to describe the types and amounts of hazardous wastes generated at the facility. We reviewed the 1988

State of Alaska Department of Environmental Conservation Hazardous Generation and Shipment Report submitted on February 27, 1989 by the facility. A copy of the Annual Report is attached in Appendix 2. The facility considered itself a small quantity generator of 100-1000 kg. per month of hazardous waste in the annual report. The facility generated 40 gallons of kerosene with the EPA hazardous waste code of F002\D001, 4 gallons of 1,1,2-Trichloro-trifluoroethane with the EPA hazardous waste code of F002, 195 gallons of heat exchanger bundle cleaning sludge with the EPA hazardous waste code of K050, 85 gallons of sump sludge with the EPA hazardous waste code D001,10 gallons of mercury spill debris with the EPA hazardous waste code of D009, and 5 gallons of tetraethyl lead contaminated debris with the EPA hazardous waste code of D008. Crosby and Overton Inc. in Kent, Washington was used as the off-site installation for receipt of the waste.

The spent kerosene is from dip tanks used in the maintenance shop for parts cleaning. In the past, cleaning solvents with trichloroethylene had been used in the dip tanks but this practice is being discontinued. The facility has one 50-gallon and one 15-gallon dip tank inside the maintenance shop and one 100-gallon hot kerosene tank located outside the maintenance shop. The 1,1,2-Trichloro-trifluoroethane was from spent reagents in the laboratory located on the MAPI facility. The lab may occasionally generate small quantities of these spent reagents. The heat exchangers are cleaned once or twice a year and the resulting sludge is placed in containers as a hazardous waste. The sludge in the sumps at the facility are occasionally cleaned out and some of the resulting sludge is classified as an ignitable hazardous waste. The mercury and tetraethyl lead was from spill cleanup residue.

Other potential hazardous wastes generated may be tank bottoms (leaded) from the petroleum refining industry with EPA hazardous waste number K052. Even though the facility has some of these tanks for leaded gasoline, they have not needed to clean these tanks. The refinery also uses a clay tower to filter out impurities in some of the oil products. The clay from this tower is changed once every two to three years. This material has been tested for its characteristics and shown not to be a hazardous waste. The used oil from the plant generators are recycled through the refinery processes. The used oil from refinery machinery is sent to an off-site waste oil burner in Fairbanks.

The facility on their hazardous waste notification to EPA showed the facility generating K049 and K051. K049 is slop oil emulsion solids from the petroleum refining industry and K051 is API separator sludge from the petroleum refining industry. When queried about these wastes the facility stated that they do not generate these wastes. They stated that they did not know why they had notified for the slop oil or where it may be generated at the facility. The facility has an oil water separator on-site (Tank 192) but claim that it doesn't meet the definition of an API Separator. This claim was later verified by Bill Adams of the EPA enforcement staff in Region 10. Therefore, any sludge generated

from the cleanup of Tank 192 is not considered K051. Tank 192 was cleaned out last fall and the sludge was tested for its characteristics. Based on lab analyses this waste was determined to be a non-hazardous waste. The drums of sludge were sent to Alaska Pollution Control as a non-hazardous waste. Since the refinery does not use a dissolved air flotation (DAF) unit, it does not generate any K048, DAF float from the petroleum refining industry.

After the discussion on wastes generated, we reviewed their compliance with the 40 CFR 265 and 262 regulations. We first did a review of the manifests on file. We noted on manifest document number MPRO2, a copy of which is attached in Appendix 3, that the facility's land disposal restriction notification to Crosby and Overton was not as complete as required in 40 CFR 268.7(a)(1). The facility had neglected to show that in addition to the K050 waste that F002 was also a land disposal restricted waste. The notification also failed to show the corresponding treatment standards for these type of wastes. The facility explained that Crosby and Overton had supplied the notification and were surprised that it didn't contain all the required information. Since Crosby and Overton supplied the notification, it was determined not to be a violation, but MAPI was advised to contact C & O and ensure they supply all the necessary information needed on any future shipments of land disposal restricted hazardous wastes.

We then reviewed the waste analysis plan for the facility. MAPI had just recently submitted their waste analysis plan to EPA as part of a sixty day submittal as required by the 3008(a) Consent Agreement and Final Order. We reviewed the plan and it appeared to contain all the required information as specified in 40 CFR 265.13. The security of the facility was reviewed and it also appeared to be adequate. We then reviewed the general inspection requirements. As part of the sixty day response to the 3008(a) Order the facility had included inspection and record keeping procedures for the Boneyard Waste Storage Area, Hazardous Waste Drum Storage Area, Tank 192, Sumps 901, 905, 909-B and 05-7, and Lagoon B. The facility had been conducting inspections of these areas and showed us the log of inspections. The past inspection logs had not identified the types of problems which are to be looked for during the inspection as required by 40 CFR 265.15(b)(3). However, the new inspection logs included in the sixty day submittal did include this information on them. The facility stated that they would immediately institute the use of these new log sheets. Therefore, it was determined not to be a violation for the facility. Again, this detailed a log sheet would only be a violation if this facility was considered a TSD. As a generator the log sheet that was currently being used was more than adequate to meet regulatory standards under 40 CFR 262.

We then reviewed the personnel training procedures at the facility. It appeared that the facility complied with the personnel training requirements except for certain items relating to maintaining certain documents and records at the facility. Attached in

Appendix 4 is a copy of a generic job description as utilized by the facility. There was no written description of the type and amount of both introductory and continuing training that was to be given to each position relating to hazardous waste management as required by 40 CFR 265.16(d)(3). The EPA Consent and Final Order with MAPI states that MAPI must be in compliance with the 40 CFR 262 Generator standards. A greater than 1,000 kg. per month generator would have to comply with 40 CFR 265.16 personnel training requirements. However, since it appears that MAPI is a small quantity generator of 100-1,000 kg. per month, they would not have to comply with 40 CFR 265.16. It appears that MAPI is ensuring that all employees are thoroughly familiar with proper waste handling and emergency procedures, relevant to their responsibilities during normal facility operations and emergencies as required by 40 CFR 262.34(d)(5)(iii). Therefore, this was determined not to be a violation for the MAPI facility.

We then reviewed Subparts C, D, and E of 40 CFR 265. It appeared that their Preparedness and Prevention, Contingency Plan and Emergency Procedures, and Manifest System, Recordkeeping, and Reporting all seemed to be in order. We then discussed Subpart F for Ground-Water Monitoring. MAPI explained that there were three downgradient wells and upgradient wells installed around Lagoon B. DEC explained that we would not be checking the adequacy of the facility's groundwater monitoring system as part of the RCRA CEI but that a separate inspection by EPA or its contractor would be scheduled to conduct a comprehensive monitoring evaluation (CME) on the facility's groundwater system. The closure plans under Subpart G were not reviewed with the facility since these were not required under the Consent Agreement and Final Order until 90 days after the effective date, January 6, 1989. Finally, the Subpart H Financial Requirements were mentioned but not discussed. It appears that the facility's demonstration of compliance with 40 CFR 265.142 and .143 were not submitted with the 60 day submittal as required by the Consent Agreement and Final Order. This demonstration may have occurred with previous financial documents submitted to EPA.

Facility Inspection:

Mr. Fritz, Mr. Rowse, and Ms. Buscovich lead us on a tour of the facility. We first stopped at the maintenance shop. A 15-gallon and 50 gallon kerosene parts cleaning tanks were observed inside the shop and outside the shop was a 100 gallon hot kerosene cleaning tank. We then observed sump 901. The sump system at the refinery basically contains washdown water from the facility. It was explained that the outside sumps used to be concrete sumps but due to the problems with cracking of the concrete a steel box liner had been installed in them. We then observed Tank 192. As explained previously, this is basically an oil\water separator and does not meet the definition of an API Separator. The accumulated sludge had been cleaned out of Tank 192 last fall and was tested and found not to be a hazardous waste by characteristic. Northern

Testing Labs ran the analyses and a copy of this analyses was sent to EPA Region 10 and is also included in Appendix C of the facilities ninty day submittal as required by the 3008(a) Consent Order.

We then toured the Effluent Building and observed sumps 905 and 907. It was explained that since this was a heated building it wasn't necessary to replace the concrete sumps with steel liners. We then observed the facility's lagoon system where the wastewater is treated. A double-lined lagoon A with a leachate collection system had been built in the fall of 1987. Lagoon B, with the RCRA groundwater monitoring system, is to be eventually phased out. The groundwater monitoring wells were observed around this surface impoundment. A Lagoon C is to be built to replace Lagoon B. MAPI has a pretreatment permit for their discharge from the lagoons to the City of North Pole's public owned treatment works. We also observed the 909B sump in this area.

We then inspected the container hazardous waste accumulation area. In storage was one drum of waste oil, one drum of kerosene used for parts cleaning, and one drum of absorbent pads for spill cleanup. The drum of kerosene was marked with the hazardous waste label and was dated January 11, 1989. We then inspected the Boneyard area where drums of material had been stored in the past. No drums were observed in this area at the time of this inspection.

We then toured the on-site laboratory at the facility and spoke to the lab director. It appears that the lab may use materials which are toxic wastes listed in Subpart D of 40 CFR 261 when they are discharged as part of the wastewater. However, it appears that the annualized average flow of laboratory wastewater does not exceed one percent of total wastewater flow into the headworks of the facility's wastewater treatment or pre-treatment system or its combined annualized average concentration does not exceed one part per million in the headworks of the facility's wastewater treatment or pre-treatment facility. Therefore, these lab solid wastes are not defined as hazardous wastes as stated in 40 CFR 261.3(a)(2)(iv)(E). The lab director stated she had run tests to show that her lab meets these criteria. The facility calculated that the total waste water flow is 30 to 35 gallons per minute, the lab calculated its flow to be .27 gallons per minute.

We then observed sump 05-7, the tetra-ethyl lead storage room, and the area where the bundle cleaning sludge is generated. This concluded the facility tour. Photographs of the facility tour are included in Appendix 5.

Sample Collection:

There was no need to collect samples as part of this inspection.

Closing Discussion With Facility:

Potential violations discussed with the facility were those related to paperwork requirements (No violations were observed as part of the facility tour). These potential violations included not having all the necessary information on the land disposal restriction notification, not including all the items to be checked for on the inspection logs, and not having the required hazardous waste training included on the facility's job descriptions relating to hazardous waste management. It was stated by the DEC inspector Mr. Ron Lillich, that he would need to read the requirements of the Consent Agreement and Final Order and talk to EPA before making a final determination on these violations. The inspection at the facility concluded at approximately 2:30 p.m.

Conclusions:

It has been determined that the potential violations discussed with the facility should not be listed as violations. The violations noted during this inspection would apply only to a TSD facility, and as discussed in the body of this report, after review of materials relating to this facility and discussions with EPA Region 10 enforcement personnel MAPI would be considered a generator of hazardous waste not a TSD. A no violation letter has been prepared by the State for this facility.

Appendices:

1- Notification of Hazardous Waste Activity
2- 1988 Annual Report to DEC
3- Manifest MPR02
4- MAPI's Generic Job Description
5- Photographs
6- Site Map
7- RCRA CEI Checklist

APPENDIX 1
NOTIFICATION OF
HAZARDOUS WASTE ACTIVITY

Kathleen McCullom Buscovich
ENVIROMENTAL COORDINATOR

MAPCO ALASKA PETROLEUM INC.

1100 H & H LANE
NORTH POLE, ALASKA 99705
(907) 488-2741 EXT. 233

Gerald E. Fritz
GENERAL MANAGER

MAPCO ALASKA PETROLEUM INC.

1100 H & H LANE
NORTH POLE, ALASKA 99705
(907) 488-2741

Please print or type with ELITE type (12 characters per inch) in the unshaded areas only

Form Approved. OMB No. 2050-0028. Expires 9-30-88. GSA No. 0246-EPA-OT

United States Environmental Protection Agency
Washington, DC 20460

EPA Notification of Hazardous Waste Activity

Please refer to the *Instructions for Filing Notification* before completing this form. The information requested here is required by law (*Section 3010 of the Resource Conservation and Recovery Act*).

For Official Use Only

Comments

Installation's EPA ID Number	Approved	Date Received (yr. mo. day)
C F AKD000850701 T/A C 1		

I. Name of Installation

NORTH POLE REFINERY

II. Installation Mailing Address

Street or P.O. Box: C 3 1100 H&H LANE

City or Town	State	ZIP Code
C 4 NORTH POLE	AK	99705

III. Location of Installation

Street or Route Number: C 5 1100 H&H LANE

City or Town	State	ZIP Code
C 6 NORTH POLE	AK	99705

IV. Installation Contact

Name and Title (*last, first, and job title*)	Phone Number (*area code and number*)
C 2 ROWSE D C	907 488 2741

V. Ownership

A. Name of Installation's Legal Owner	B. Type of Ownership (*enter code*)
C R MAPCO-ALASKA-PETROLEUM-INC.	P

VI. Type of Regulated Waste Activity (*Mark 'X' in the appropriate boxes. Refer to instructions.*)

A. Hazardous Waste Activity

- [XX] 1a. Generator
- [ ] 1b. Less than 1,000 kg/mo.
- [ ] 2. Transporter
- [ ] 3. Treater/Storer/Disposer
- [ ] 4. Underground Injection
- [ ] 5. Market or Burn Hazardous Waste Fuel (*enter 'X' and mark appropriate boxes below*)
  - [ ] a. Generator Marketing to Burner
  - [ ] b. Other Marketer
  - [ ] c. Burner

RECEIVED MAR 12 1987 HAZARDOUS WASTE DIVISION

B. Used Oil Fuel Activities

- [ ] 6. Off-Specification Used Oil Fuel (*enter 'X' and mark appropriate boxes below*)
  - [ ] a. Generator Marketing to Burner
  - [ ] b. Other Marketer
  - [ ] c. Burner
- [ ] 7. Specification Used Oil Fuel Marketer (*or On site Burner*) Who First Claims the Oil Meets the Specification

VII. Waste Fuel Burning: Type of Combustion Device

(*enter 'X' in all appropriate boxes to indicate type of combustion device(s) in which hazardous waste fuel or off-specification used oil fuel is burned. See instructions for definitions of combustion devices.*)

- [ ] A. Utility Boiler
- [ ] B. Industrial Boiler
- [ ] C. Industrial Furnace

VIII. Mode of Transportation (*transporters only — enter 'X' in the appropriate box(es)*)

- [ ] A. Air
- [ ] B. Rail
- [ ] C. Highway
- [ ] D. Water
- [ ] E. Other (*specify*)

IX. First or Subsequent Notification

Mark 'X' in the appropriate box to indicate whether this is your installation's first notification of hazardous waste activity or a subsequent notification. If this is not your first notification, enter your installation's EPA ID Number in the space provided below.

- [XX] A. First Notification
- [ ] B. Subsequent Notification (*complete item C*)

C. Installation's EPA ID Number

EPA Form 8700-12 (Rev. 11-85) Previous edition is obsolete.

Continue on reverse

3/13/87 3-17-87

ID — For Official Use Only			
C		T/A	C
W			1

X. Description of Hazardous Wastes *(continued from front)*

A. Hazardous Wastes from Nonspecific Sources. Enter the four-digit number from 40 *CFR* Part 261.31 for each listed hazardous waste from nonspecific sources your installation handles. Use additional sheets if necessary.

1	2	3	4	5	6
7	**8**	**9**	**10**	**11**	**12**

B. Hazardous Wastes from Specific Sources. Enter the four-digit number from 40 *CFR* Part 261.32 for each listed hazardous waste from specific sources your installation handles. Use additional sheets if necessary.

13	14	15	16	17	18
K049	K051				
19	**20**	**21**	**22**	**23**	**24**
25	**26**	**27**	**28**	**29**	**30**

C. Commercial Chemical Product Hazardous Wastes. Enter the four-digit number from 40 *CFR* Part 261.33 for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.

31	32	33	34	35	36
P110	U019	U056	U165	U188	U154
37	**38**	**39**	**40**	**41**	**42**
U220	U239				
43	**44**	**45**	**46**	**47**	**48**

D. Listed Infectious Wastes. Enter the four-digit number from 40 *CFR* Part 261.34 for each hazardous waste from hospitals, veterinary hospitals, or medical and research laboratories your installation handles. Use additional sheets if necessary.

49	50	51	52	53	54

E. Characteristics of Nonlisted Hazardous Wastes. Mark 'X' in the boxes corresponding to the characteristics of nonlisted hazardous wastes your installation handles. *(See 40 CFR Parts 261.21 — 261.24)*

- [X] 1. Ignitable *(D001)*
- [ ] 2. Corrosive *(D002)*
- [ ] 3. Reactive *(D003)*
- [ ] 4. Toxic *(D000)*

XI. Certification

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

Signature	Name and Official Title *(type or print)*	Date Signed
Gerald E. Fritz	Gerald E. Fritz, General Manager	3-9-87

APPENDIX 2
ANNUAL REPORT

BEFORE COPYING FORM, ATTACH SITE IDENTIFICATION LABEL OR ENTER

SITE NAME: MAPCO ALASKA PETROLEUM Inc.
North Pole Refinery
1100 H & H Lane
North Pole, AK 99705

EPA ID NO: A K D 0 0 0 8 5 0 7 0 1

FORM **IC**

State of Alaska
Department of
Environmental Conservation

1988 Hazardous Waste Generation and Shipment Report

IDENTIFICATION AND CERTIFICATION

FEB 28

WHO MUST COMPLETE THIS FORM? Form IC must be completed by every site that received this package.

INSTRUCTIONS: Please read the detailed instructions beginning on page 8 of the 1988 Hazardous Waste Generation and Shipment Report Instructions booklet before completing this form.

Complete Sections I through IV and Sections VI through IX immediately. Complete Section V, certification, after you have finished the full report package.

SEC I Site name and physical location which may differ from the mailing address. Complete items A through G. Mark "X" for items A, B, C, D, F, and G if same as label; if different, enter corrections. If label is absent, enter information.

A. Site company name (Same as label ☐)	B. EPA ID No. (Same as label ☐)
or — MAPCO ALASKA PETROLEUM Inc.	or — A K D 0 0 0 8 5 0 7 0 1

C. Address number and street name of physical location - if not known, enter industrial park, building name or other physical location description (Same as label ☐)
or — 1100 H & H Lane

D. City, town, village, etc. (Same as label ☐)	E. County	F. State (Same as label ☐)	G. Zip Code (Same as label ☐)
or — North Pole		or — A K	or — 9 9 7 0 5 –

SEC II Mailing address of site. Mark "X" for A, B, C, and D if same as label; if different, enter corrections.

A. Number and street name of mailing address (Same as label ☐)
or — 1100 H & H Lane

B. City, town, village, etc. (Same as label ☐)	C. State (Same as label ☐)	D. Zip Code (Same as label ☐)
or — North Pole	or — A K	or — 9 9 7 0 5 –

SEC III Name, title, and telephone number of the person who should be contacted if questions arise regarding this report.

A. Please print: Last name	First name	M.I.	B. Title	C. Telephone
Buscovich	Kathleen	M.	Environmental Coordinator	9 0 7 4 8 8 – 2 7 4 1 Extension 2 3 3

SEC IV Enter the Standard Industrial Classification (SIC) Code that describes the principal products, group of products, produced or distributed, or the services rendered at the site's physical location. Enter more than one SIC Code only if no one industry description includes the combined activities of the site. SIC codes are listed beginning on page 1 of the 1988 Hazardous Waste Generation, Shipment and Management Report Codebook.

A.	B.	C.	D.	E.	F.
2 9 1 1	N A	N A	N A	N A	N A

SEC V I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. Please print: Last name	First name	M.I.	Title
Buscovich	Kathleen	M.	Environmental Coordinator

B. Signature	Date of signature (Mo. Day Yr.)
Kathleen Buscovich	02 27 89

OVER --->

SEC. VI Does this site's EPA ID authorize hazardous waste generation?

- [ ] NO —— SKIP TO SECTION VII
- [X] YES —— Did this site generate any hazardous waste during 1988?
  - [X] YES —— READ DETAILED INSTRUCTION ON PAGE 9 OF THE 1988 HAZARDOUS WASTE GENERATION AND SHIPMENT REPORT INSTRUCTIONS BOOKLET FOR ACUTE AND ACCUMULATION LIMITS. MARK "X" NEXT TO THE HAZARDOUS WASTE GENERATION QUANTITY CATEGORY THAT APPLIED TO THIS SITE DURING 1987.
    - [ ] Category 1: More than 1000 kg (2,200 lb) in one or more months
    - [X] Category 2: More than 100 kg (220 lb) but no more than 1000 kg (2,200 lb) in any single month
    - [ ] Category 3: No more than 100 kg (220 lb) in any single month
      - [ ] Mark "X" if this site changed from Category 1 to Category 2 or 3 due to waste minimization activity conducted during 1987 or 1988.
  - [ ] NO —— CONTINUE BELOW. MARK "X" NEXT TO ALL THAT APPLY.
    - [ ] Generated, excluded or delisted wastes
    - [ ] Generated hazardous waste prior to 1988 but do not expect to generate in the future - MARK "X" FOR REASON IN ONE BOX BELOW
      - [ ] Waste was from one-time event(s) (e.g. spills, remedial actions, etc.)
      - [ ] Waste minimization activity undertaken during 1987 or 1988
      - [ ] Out of business
    - [ ] Generated hazardous waste prior to 1988 and expect to generate in the future
    - [ ] Never generated before but expect to generate in the future
    - [ ] Never generated and do not expect to generate in the future - MARK "X" FOR REASON IN ONE BOX BELOW
      - [ ] Protective notifier only
      - [ ] Misunderstood the requirements
      - [ ] Notified to secure transportation services
      - [ ] Other EXPLAIN REASON FOR GENERATOR NOTIFICATION IN COMMENTS

SEC. VII Does this site have RCRA Interim Status or a RCRA permit to treat, store, or dispose hazardous waste?

- [X] NO —— SKIP TO SECTION VIII
- [ ] YES —— Did the site treat, store, or dispose (T/S/D) hazardous waste in RCRA-regulated units during 1988?
  - [ ] YES —— SKIP TO SECTION VIII
  - [ ] NO —— CONTINUE BELOW. MARK "X" NEXT TO ALL THAT APPLY
    - [ ] T/S/D excluded waste during 1988
    - [ ] T/S/D hazardous waste in exempt units during 1988
    - [ ] T/S/D hazardous waste prior to 1988 but did not T/S/D waste during 1988. MARK "X" IN ONE BOX BELOW
      - [ ] T/S/D will resume in the future
      - [ ] Have notified of planned closure
      - [ ] Site is in closure or post closure
    - [ ] Never T/S/D hazardous waste prior to 1988 but: MARK "X" IN ONE BOX BELOW
      - [ ] Expect to T/S/D hazardous waste in the future
      - [ ] Do not expect to T/S/D hazardous waste in the future - EXPLAIN REASON FOR INTERIM STATUS OR PERMIT IN COMMENTS

SEC. VIII. Do you wish to withdraw this site's generator notification or EPA Part A permit application?

Withdraw generator notification	[ ] Yes	[X] No
Withdraw Part A permit application	[ ] Yes	[ ] No

SEC. IX Does this site have an area not requiring a RCRA Part A or Part B permit that is used exclusively for the short term accumulation of hazardous waste?

- [X] NO
- [ ] YES —— DOES THE AREA HAVE

			ENTER THE NUMBER OF TANKS AND THEIR TOTAL CAPACITY IN GALLONS
Containers	[ ] No	[ ] Yes	
Tanks	[ ] No	[ ] Yes	Number ..... Gallon capacity

Comments:

BEFORE COPYING FORM, ATTACH SITE IDENTIFICATION LABEL OR ENTER

SITE NAME: MAPCO ALASKA PETROLEUM Inc.
North Pole Refinery
1100 H & H Lane
North Pole, AK 99705

EPA ID NO: A K D 0 0 0 8 5 0 7 0 1

State of Alaska
Department of
Environmental Conservation

1988 Hazardous Waste Generation and Shipment Report

FORM **GS**

WASTE GENERATION AND SHIPMENT

WHO MUST COMPLETE THIS FORM? Form GS must be completed by every site that generated hazardous waste on site or shipped hazardous waste off site during 1988.

☐ Mark ☒ if you are not required to complete Form GS.

INSTRUCTIONS: Please read the detailed instructions beginning on page 12 of the 1988 Hazardous Waste Generation and Shipment Report Instructions booklet before completing this form.

Make and complete a photocopy of this form for each hazardous waste generated on site or shipped off site during 1988.

Complete Sections I through IV. Throughout this form enter "DK" if the information requested is not known or is not available; enter "NA" if the information requested is not applicable.

Sec. I

A. Waste description (Instruction Page 12): Kerosene

B. EPA hazardous waste code (Page 12): F002 D001

C. State hazardous waste code (Page 13): NA

D. SIC code (Page 13): 2911

E. Source code (Page 13): 10

F. Waste form code (Page 13): H83

G. Waste minimization results (Page 13): B

Sec. II

A. Organics (Instruction Page 14): High ; Low ; Test ; Note D

B. Water (Page 15): High ; Low ; Note N

C. Total Solids (Page 15): High ; Low ; Note N

D. Suspended Solids (Page 15): High ; Low ; Note N

E. BTU (Page 16): High ; Low ; UOM ; Note N

F. Toxic Metals (Page 16) Note B

	Metal	High	Low	Test
1.				
2.				
3.				
4.				
5.				
6.				

G. pH (Page 18): High ; Low ; Note D

H. Flashpoint (Page 18): High °F ; Low °F ; Note D

I. Cyanides (Page 19): High ; Low ; Test ; Note D

J. Halogens (Page 20): High Q ; Low ; Note

K. Radioactive (Page 20): Yes ☐ ; No ☐ ; Note N

Sec. III

A. (1) quantity hazardous waste generated (Instruction Page 20): 55

B. (2) quantity hazardous waste generated (Page 20): 40

C. UOM (Page 21): G

D. Density (Page 21): 8.0 ☒ lbs/gal ☐ kg

E. Quantity hazardous waste on site on January 1, ~~19XX~~ 1988 (Page 21): 0

F. Quantity hazardous waste remaining on site on December 31, ~~19XX~~ 1988 (Page 21): 0

Sec. IV

A. EPA ID No. of facility to which waste was shipped (Instruction Page 22): WAD991281767

B. Number of shipments (Page 22): 1

C. Transport mode (Page 22): G*

D. Off-site T/S/D/R code (Page 22): DK DK

E. Total quantity shipped (Page 22): 40

Comments: *Transport Made: Fairbanks to Anchorage - Highway; Anchorage to Seattle - Water

BEFORE COPYING FORM, ATTACH SITE IDENTIFICATION LABEL OR ENTER

SITE NAME: MAPCO ALASKA PETROLEUM Inc.
North Pole Refinery
1100 H & H Lane
North Pole, AK 99705

EPA ID NO: A K D 0 0 0 8 5 0 7 0 1

State of Alaska
Department of
Environmental Conservation

1988 Hazardous Waste Generation and Shipment Report

FORM **GS**

WASTE GENERATION AND SHIPMENT

WHO MUST COMPLETE THIS FORM? Form GS must be completed by every site that generated hazardous waste on site or shipped hazardous waste off site during 1988.

☐ Mark ☒ if you are not required to complete Form GS.

INSTRUCTIONS: Please read the detailed instructions beginning on page 12 of the 1988 Hazardous Waste Generation and Shipment Report Instructions booklet before completing this form.

Make and complete a photocopy of this form for each hazardous waste generated on site or shipped off site during 1988.

Complete Sections I through IV. Throughout this form enter "DK" if the information requested is not known or is not available; enter "NA" if the information requested is not applicable.

Sec. I

A. Waste description (Instruction Page 12): 1,1,2-Trichloro - 1,2,2-trifluoroethane

B. EPA hazardous waste code (Page 12): F 0 0 2

C. State hazardous waste code (Page 13): NA

D. SIC code (Page 13): 2 9 1 1

E. Source code (Page 13): 2 3

F. Waste form code (Page 13): H 6 1

G. Waste minimization results (Page 13): B

Sec. II

A. Organics (Instruction Page 14): High ; Low ; Test ; Note D

B. Water (Page 15): High ; Low ; Note N

C. Total Solids (Page 15): High ; Low ; Note N

D. Suspended Solids (Page 15): High ; Low ; Note N

E. BTU (Page 16): High ; Low ; UOM ; Note N

F. Toxic Metals (Page 16) Note A

	Metal	High	Low	Test
1.				
2.				
3.				
4.				
5.				
6.				

G. pH (Page 18): High ; Low ; Note D

H. Flashpoint (Page 18): High °F ; Low °F ; Note D

I. Cyanides (Page 19): High ; Low ; Test ; Note D

J. Halogens (Page 20): High ; Low ; Note D

K. Radioactive (Page 20): Yes ☐ ; No ☐ ; Note N

Sec. III

A. 1987 quantity hazardous waste generated (Instruction Page 20): 0

B. 1988 quantity hazardous waste generated (Page 20): 4

C. UOM (Page 21): L

D. Density (Page 21): 8 . 0 ☒ lbs/gal ☐ sg

E. Quantity hazardous waste on site on January 1, ~~1987~~ 1988 (Page 21): 0

F. Quantity hazardous waste remaining on site on December 31, ~~1987~~ 1988 (Page 21): 0

Sec. IV

A. EPA ID No. of facility to which waste was shipped (Instruction Page 22): W A D 9 9 1 2 8 1 7 6 7

B. Number of shipments (Page 22): 1

C. Transport mode (Page 22): G*

D. Off-site T/S/D/R code (Page 22): D K ; D K

E. Total quantity shipped (Page 22): 4

Comments: *Transport Made: Fairbanks to Anchorage - Highway; Anchorage to Seattle - Water

BEFORE COPYING FORM, ATTACH SITE IDENTIFICATION LABEL OR ENTER

SITE NAME: MAPCO ALASKA PETROLEUM Inc.
North Pole Refinery
1100 H & H Lane
North Pole, AK 99705

EPA ID NO: A K D 0 0 0 8 5 0 7 0 1

State of Alaska
Department of
Environmental Conservation

1988 Hazardous Waste Generation and Shipment Report

FORM **GS**

WASTE GENERATION AND SHIPMENT

WHO MUST COMPLETE THIS FORM? Form GS must be completed by every site that generated hazardous waste on site or shipped hazardous waste off site during 1988.

☐ Mark ☒ if you are not required to complete Form GS.

INSTRUCTIONS: Please read the detailed instructions beginning on page 12 of the 1988 Hazardous Waste Generation and Shipment Report Instructions booklet before completing this form.

Make and complete a photocopy of this form for each hazardous waste generated on site or shipped off site during 1988.

Complete Sections I through IV. Throughout this form enter "DK" if the information requested is not known or is not available; enter "NA" if the information requested is not applicable.

Sec. I

A. Waste description (Instruction Page 12): Heat Exchanger bundle cleaning sludge

B. EPA hazardous waste code (Page 12): K 0 5 0

C. State hazardous waste code (Page 13): NA

D. SIC code (Page 13): 2 9 1 1

E. Source code (Page 13): 1 0

F. Waste form code (Page 13): N 8 3

G. Waste minimization results (Page 13): B

Sec. II

A. Organics (Instruction Page 14): High ; Low ; Test ; Note N

B. Water (Page 15): High ; Low ; Note N

C. Total Solids (Page 15): High ; Low ; Note N

D. Suspended Solids (Page 15): High ; Low ; Note N

E. BTU (Page 16): High ; Low ; UOM ; Note N

F. Toxic Metals (Page 16) Note B

Metal	High	Low	Test
1.			
2.			
3.			
4.			
5.			
6.			

G. pH (Page 18): High ; Low ; Note D

H. Flashpoint (Page 18): High °F ; Low °F ; Note D

I. Cyanides (Page 19): High ; Low ; Test ; Note D

J. Halogens (Page 20): High ; Low ; Note N

K. Radioactive (Page 20): Yes ☐ ; No ☒ ; Note

Sec. III

A. Total quantity hazardous waste generated (Instruction Page 20): 3 3 0

B. Total quantity hazardous waste generated (Page 20): 1 9 5

C. UOM (Page 21): G

D. Density (Page 21): 1 3 . 6 ☒ lbs/gal ☐ sg

E. Quantity hazardous waste on site on January 1, ~~19XX~~ 1988 (Page 21): 0

F. Quantity hazardous waste remaining on site on December 31, ~~19XX~~ 1988 (Page 21): 0

Sec. IV

A. EPA ID No. of facility to which waste was shipped (Instruction Page 22): W A D 9 9 1 2 8 1 7 6 7

B. Number of shipments (Page 22): 2

C. Transport mode (Page 22): G*

D. Off-site T/S/D/R code (Page 22): D K ; D K

E. Total quantity shipped (Page 22): 1 9 5

Comments: *Transport Made: Fairbanks to Anchorage - Highway; Anchorage to Seattle - Water

BEFORE COPYING FORM, ATTACH SITE IDENTIFICATION LABEL OR ENTER.

SITE NAME: MAPCO ALASKA PETROLEUM Inc.
North Pole Refinery
1100 H & H Lane
North Pole, AK 99705

EPA ID NO. AKD008507 01

State of Alaska
Department of
Environmental Conservation

1988 Hazardous Waste Generation and Shipment Report

FORM **GS**

WASTE GENERATION AND SHIPMENT

WHO MUST COMPLETE THIS FORM? Form GS must be completed by every site that generated hazardous waste on site or shipped hazardous waste off site during 1988.

☐ Mark ☒ if you are not required to complete Form GS.

INSTRUCTIONS: Please read the detailed instructions beginning on page 12 of the 1988 Hazardous Waste Generation and Shipment Report Instructions booklet before completing this form.

Make and complete a photocopy of this form for each hazardous waste generated on site or shipped off site during 1988.

Complete Sections I through IV. Throughout this form enter "DK" if the information requested is not known or is not available; enter "NA" if the information requested is not applicable.

Sec. I

A. Waste description (Instruction Page 12): Sump Sludge

B. EPA hazardous waste code (Page 12): D001

C. State hazardous waste code (Page 13): NA

D. SIC code (Page 13): 2911

E. Source code (Page 13): 10

F. Waste form code (Page 13): N83

G. Waste minimization results (Page 13): B

Sec. II

A. Organics (Instruction Page 14): High ; Low ; Test ; Note D

B. Water (Page 15): High ; Low ; Note N

C. Total Solids (Page 15): High ; Low ; Note N

D. Suspended Solids (Page 15): High ; Low ; Note N

E. BTU (Page 16): High ; Low ; UOM ; Note N

F. Toxic Metals (Page 16) Note D

Metal	High	Low	Test
1.			
2.			
3.			
4.			
5.			
6.			

G. pH (Page 18): High ; Low ; Note D

H. Flashpoint (Page 18): High °F ; Low °C ; Note D

I. Cyanides (Page 19): High ; Low ; Test ; Note D

J. Halogens (Page 20): High ; Low ; Note N

K. Radioactive (Page 20): Yes ☐ ; No ☐ ; Note N

Sec. III

A. 1987 quantity hazardous waste generated (Instruction Page 20): 220

B. 1988 quantity hazardous waste generated (Page 20): 85

C. UOM (Page 21): G

D. Density (Page 21): 13.6 ☒ lbs/gal ☐ sg

E. Quantity hazardous waste on site on January 1, ~~1987~~ 1988 (Page 21): 0

F. Quantity hazardous waste remaining on site on December 31, ~~1987~~ 1988 (Page 21): 0

Sec. IV

A. EPA ID No. of facility to which waste was shipped (Instruction Page 22)	B. Number of shipments (Page 22)	C. Transport mode (Page 22)	D. Off-site T/S/D/R code (Page 22)	E. Total quantity shipped (Page 22)
WAD991281767	1	G*	DIK DIK	815

Comments: *Transport Made: Fairbanks to Anchorage - Highway; Anchorage to Seattle - Water

BEFORE COPYING FORM, ATTACH SITE IDENTIFICATION LABEL OR ENTER

SITE NAME: MAPCO ALASKA PETROLEUM Inc.
North Pole Refinery
1100 H & H Lane
North Pole, AK 99705

EPA ID NO: A K D 0 0 0 8 5 0 7 0 1

State of Alaska
Department of
Environmental Conservation

1988 Hazardous Waste Generation and Shipment Report

FORM **GS**

WASTE GENERATION AND SHIPMENT

WHO MUST COMPLETE THIS FORM? Form GS must be completed by every site that generated hazardous waste on site or shipped hazardous waste off site during 1988.

☐ Mark ☒ if you are not required to complete Form GS.

INSTRUCTIONS: Please read the detailed instructions beginning on page 12 of the 1988 Hazardous Waste Generation and Shipment Report Instructions booklet before completing this form.

Make and complete a photocopy of this form for each hazardous waste generated on site or shipped off site during 1988.

Complete Sections I through IV. Throughout this form enter "DK" if the information requested is not known or is not available; enter "NA" if the information requested is not applicable.

Sec. I

A. Waste description (Instruction Page 12): Mercury Spill Debris

B. EPA hazardous waste code (Page 12): D009

C. State hazardous waste code (Page 13): NA

D. SIC code (Page 13): 2911

E. Source code (Page 13): 23

F. Waste form code (Page 13): N95

G. Waste minimization results (Page 13): B

Sec. II

A. Organics (Instruction Page 14): High ; Low ; Test ; Note N

B. Water (Page 15): High ; Low ; Note N

C. Total Solids (Page 15): High ; Low ; Note N

D. Suspended Solids (Page 15): High ; Low ; Note N

E. BTU (Page 16): High ; Low ; UOM ; Note N

F. Toxic Metals (Page 16) Note D

	Metal	High	Low	Test
1.				
2.				
3.				
4.				
5.				
6.				

G. pH (Page 18): High ; Low ; Note D

H. Flashpoint (Page 18): High °F ; Low °C ; Note D

I. Cyanides (Page 19): High ; Low ; Test ; Note D

J. Halogens (Page 20): High ; Low ; Note N

K. Radioactive (Page 20): Yes ☐ ; No ☐ ; Note N

Sec. III

A. 1987 quantity hazardous waste generated (Instruction Page 20): 0

B. 1988 quantity hazardous waste generated (Page 20): 10

C. UOM (Page 21): G

D. Density (Page 21): 2.0 ☒ lbs/gal ☐ sg

E. Quantity hazardous waste on site on January 1, ~~1988~~ XXX 1988 (Page 21): 0

F. Quantity hazardous waste remaining on site on December 31, ~~1987~~ XXX 1988 (Page 21): 0

Sec. IV

A. EPA ID No. of facility to which waste was shipped (Instruction Page 22): WAD991286176 7

B. Number of shipments (Page 22): 1

C. Transport mode (Page 22): G*

D. Off-site T/S/D/R code (Page 22): DIK DIK

E. Total quantity shipped (Page 22): 10

Comments: *Transport Made: Fairbanks to Anchorage - Highway; Anchorage to Seattle - Water

BEFORE COPYING FORM, ATTACH SITE IDENTIFICATION LABEL OR ENTER

SITE NAME: MAPCO ALASKA PETROLEUM Inc.
North Pole Refinery
1100 H & H Lane
North Pole, AK 99705

EPA ID NO: A K D 0 0 0 8 5 0 7 0 1

State of Alaska
Department of
Environmental Conservation

1988 Hazardous Waste Generation and Shipment Report

FORM **GS**

WASTE GENERATION AND SHIPMENT

WHO MUST COMPLETE THIS FORM? Form GS must be completed by every site that generated hazardous waste on site or shipped hazardous waste off site during 1988.

☐ Mark ☒ if you are not required to complete Form GS.

INSTRUCTIONS: Please read the detailed instructions beginning on page 12 of the 1988 Hazardous Waste Generation and Shipment Report Instructions booklet before completing this form.

Make and complete a photocopy of this form for each hazardous waste generated on site or shipped off site during 1988.

Complete Sections I through IV. Throughout this form enter "DK" if the information requested is not known or is not available; enter "NA" if the information requested is not applicable.

Sec. I

A. Waste description (Instruction Page 12): Tetraethyl Lead Contaminated Debris

B. EPA hazardous waste code (Page 12): D008

C. State hazardous waste code (Page 13): NA

D. SIC code (Page 13): 2911

E. Source code (Page 13): 23

F. Waste form code (Page 13): N99**

G. Waste minimization results (Page 13): B

Sec. II

A. Organics (Instruction Page 14): High ; Low ; Test ; Note N

B. Water (Page 15): High ; Low ; Note N

C. Total Solids (Page 15): High ; Low ; Note N

D. Suspended Solids (Page 15): High ; Low ; Note N

E. BTU (Page 16): High ; Low ; UOM ; Note N

F. Toxic Metals (Page 16) Note D

Metal	High	Low	Test
1.			
2.			
3.			
4.			
5.			
6.			

G. pH (Page 18): High ; Low ; Note D

H. Flashpoint (Page 18): High °F ; Low °C ; Note D

I. Cyanides (Page 19): High ; Low ; Test ; Note D

J. Halogens (Page 20): High ; Low ; Note N

K. Radioactive (Page 20): Yes ☐ ; No ☐ ; Note N

Sec. III

A. 1987 quantity hazardous waste generated (Instruction Page 20): 0

B. 1988 quantity hazardous waste generated (Page 20): 5

C. UOM (Page 21): G

D. Density (Page 21): 2.0 ☒ lbs/gal ☐ kg

E. Quantity hazardous waste on site on January 1, ~~1987~~ 1988 (Page 21): 0

F. Quantity hazardous waste remaining on site on December 31, ~~1987~~ 1988 (Page 21): 0

Sec. IV

A. EPA ID No. of facility to which waste was shipped (Instruction Page 22)	B. Number of shipments (Page 22)	C. Transport mode (Page 22)	D. Off-site T/S/D/R code (Page 22)	E. Total quantity shipped (Page 22)
WAD991286176 7	1	G*	DK DK	5

Comments: *Transport Made: Fairbanks to Anchorage - Highway; Anchorage to Seattle - Water

** Absorbent pads, rubber gloves, pressure gauge

BEFORE COPYING FORM, ATTACH SITE IDENTIFICATION LABEL OR ENTER:

SITE NAME: MAPCO ALASKA PETROLEUM Inc.
North Pole Refinery
1100 H & H Lane
North Pole, AK 99705

EPA ID NO. A K D 0 0 0 8 5 0 7 0 1

State of Alaska
Department of
Environmental Conservation

1988 Hazardous Waste Generation and Shipment Report

FORM **OI**

OFF-SITE IDENTIFICATION

WHO MUST COMPLETE THIS FORM? Form OI must be completed by every site that shipped hazardous waste off site and every site that received hazardous waste from off site during 1988.

Mark [X] if you are not required to complete Form OI.

INSTRUCTIONS: Please read the detailed instructions beginning on page 23 of the 1988 Hazardous Waste Generation and Shipment Report Instructions booklet before completing this form.

Complete A through E for each off-site installation to which you shipped waste or from which you received waste during 1988.

Complete A through D for every transporter you used during the reporting year.

Throughout this form enter "DK" if the information requested is not known or is not available; enter "NA" if the information requested is not applicable. Make and complete additional copies of this form if you need to identify more than four off-site installations or transporters.

Site 1

A. EPA ID No. of off-site installation or transporter (Instruction page 23): A K D 1 2 2 0 8 1 2 4 3

B. Name of off-site installation or transporter (Page 23): Carlile Enterprises

C. Site type code (Page 24): T

D. Site relationship code (Page 24): D

E. Address of off-site installation (Page 24): Street: 1524 Ship Avenue; City: Anchorage; State: A K; Zip Code: 9 9 5 0 1 –

Site 2

A. EPA ID No. of off-site installation or transporter (Instruction page 23): W A D 0 5 1 2 5 1 9 5 7

B. Name of off-site installation or transporter (Page 23): Alaska Cargo Transport

C. Site type code (Page 24): T

D. Site relationship code (Page 24): D

E. Address of off-site installation (Page 24): Street: Terminal #115 600 West Marginal Way SW; City: Seattle; State: W A; Zip Code: 9 8 1 0 6 –

Site 3

A. EPA ID No. of off-site installation or transporter (Instruction page 23): W A D 0 5 8 3 6 7 1 5 2

B. Name of off-site installation or transporter (Page 23): Northwest Enviro Service Inc.

C. Site type code (Page 24): T

D. Site relationship code (Page 24): D

E. Address of off-site installation (Page 24): Street: PO Box 24443; City: Seattle; State: W A; Zip Code: 9 8 1 2 4 –

Site 4

A. EPA ID No. of off-site installation or transporter (Instruction page 23): W A D 9 9 1 2 8 1 7 6 7

B. Name of off-site installation or transporter (Page 23): Crosby and Overton Inc.

C. Site type code (Page 24): K

D. Site relationship code (Page 24): D

E. Address of off-site installation (Page 24): Street: 20245 - 76th Ave. South/PO Box 1085; City: Kent; State: W A; Zip Code: 9 8 0 3 2 –

Comments:

BEFORE COPYING FORM, ATTACH SITE IDENTIFICATION LABEL OR ENTER

SITE NAME: MAPCO ALASKA PETROLEUM Inc.
North Pole Refinery
1100 H & H Lane
North Pole, AK 99705

EPA ID NO: A K D 0 0 0 8 5 0 7 0 1

State of Alaska
Department of
Environmental Conservation

1988 Hazardous Waste Generation and Shipment Report

FORM **WM**

WASTE MINIMIZATION

PART I

WHO MUST COMPLETE THIS FORM?

Form WM Part I, describing efforts undertaken to implement waste minimization programs, must be completed by all generators required to file an Annual Report. This requirement was established in response to statutory provisions included in the Hazardous and Solid Waste Amendments 1984 (HSWA).

NOTE: Generators shipping hazardous waste off site are required to certify, on Item 16 of the Uniform Hazardous Waste Manifest, that they have a program in place to reduce, to the degree determined economically practicable, the volume and toxicity of hazardous waste generated. A similar certification must also be made by generators who have obtained a RCRA treatment, storage, or disposal permit. Consistent with these certification requirements, generators must report, on Form WM Part I, the efforts undertaken to implement waste minimization programs.

INSTRUCTIONS:

Please read the detailed instructions on page 25 of the 1988 Hazardous Waste Generation and Shipment Report Instructions booklet before completing this form.

Answer questions 1 through 10. Throughout this form enter "DK" if the information requested is not known or is not available; enter "NA" if the information requested is not applicable.

1. Did this site create or expand a source reduction and recycling program?

	1988		1987		Prior Years	
	Yes	No	Yes	No	Yes	No
Create	☐	☒	☒	☐	☐	☒
Expand	☐	☐	☐	☐	☐	☐

2. Did this site have a written policy or statement that outlined goals, objectives and methods for source reduction and recycling of hazardous waste?

	1988	1987	Prior Years
Yes	☒	☒	☐
No	☐	☐	☒

3. What was the dollar amount of capital expenditures (plant and equipment) and operating costs devoted to source reduction and recycling of hazardous waste? ENTER ZERO (0) IF NONE.

	1988	1987	Prior Years
Capital expenditures	$ -0-	$ -0-	$ DK
Operating costs	$	$	$

4. Did this site have an employee training program or provide incentives (bonuses, awards, personal recognition, etc.) to identify and implement source reduction and recycling opportunities and activities?

	1988		1987		Prior Years	
	Yes	No	Yes	No	Yes	No
Training	☒	☐	☒	☐	☐	☒
Incentives	☐	☐	☐	☐	☐	☐

OVER —>

5. Did this site conduct a source reduction and/or recycling opportunity assessment or audit? Note: an opportunity assessment or audit is a procedure that identifies practices that can be implemented to reduce the generation of hazardous waste or the quantity which must subsequently be treated, stored or disposed.

	1988		1987		Prior Years	
	Yes	No	Yes	No	Yes	No
Site-Wide	X		X			X
Process-Specific						

6. Did this site identify or implement new SOURCE REDUCTION opportunities to reduce the volume and/or toxicity of hazardous waste generated at this site?

	1988		1987		Prior Years	
	Yes	No	Yes	No	Yes	No
Identify	X		X			X
Implement	X		X			X

7 What factors have delayed or prevented implementation of SOURCE REDUCTION opportunities. MARK [X] NEXT TO ALL THAT APPLY.

- [ ] a. Insufficient capital to install new source reduction equipment or implement new source reduction practices.
- [ ] b. Lack of technical information on source reduction techniques, applicable to my specific production processes.
- [ ] c. Source reduction is not economically feasible: cost savings in waste management or production will not recover the capital investment.
- [ ] d. Concern that product quality may decline as a result of source reduction.
- [ ] e. Technical limitations of the production processes.
- [ ] f. Permitting burdens.
- [ ] g. Other (SPECIFY) _____

8 Did this site identify or implement new RECYCLING opportunities to reduce the volume and/or toxicity of hazardous waste generated at this site or subsequently treated, stored, or disposed of on site or off site?

	1988		1987		Prior Years	
	Yes	No	Yes	No	Yes	No
Identify	X		X			X
Implement	X		X			X

EPA ID NO A K D 0 0 0 8 5 0 7 0 1

9 What factors have delayed or prevented implementation of on-site or off-site RECYCLING opportunities. MARK [X] NEXT TO ALL THAT APPLY

- [ ] a Insufficient capital to install new recycling equipment or implement new recycling practices.
- [ ] b Lack of technical information on recycling techniques applicable to this site's specific production processes.
- [ ] c Recycling is not economically feasible: cost savings in waste management or production will not recover the capital investment.
- [ ] d Concern that product quality may decline as a result of recycling.
- [ ] e Requirements to manifest wastes inhibit shipments off site for recycling.
- [ ] f Financial liability provisions inhibit shipments off site for recycling.
- [ ] g Technical limitations of product processes inhibit shipments off site for recycling.
- [ ] h Technical limitations of production processes inhibit on-site recycling.
- [ ] i Permitting burdens inhibit recycling.
- [ ] j Lack of permitted off-site recycling facilities.
- [X] k Unable to identify a market for recyclable materials.
- [ ] l Other (SPECIFY) _____

10 Has this site requested or received technical information or financial assistance on source reduction and/or recycling practices from any of the following sources? MARK [X] NEXT TO ALL THAT APPLY.

	1988		1987		Prior Years	
	Technical	Financial	Technical	Financial	Technical	Financial
a. Local government	[ ]	[ ]	[ ]	[ ]	[ ]	[ ]
b. State government	[ ]	[ ]	[ ]	[ ]	[ ]	[ ]
c. Federal government	[ ]	[ ]	[ ]	[ ]	[ ]	[ ]
d. Trade associations	[ ]	[ ]	[ ]	[ ]	[ ]	[ ]
e. Educational institutions	[ ]	[ ]	[ ]	[ ]	[ ]	[ ]
f. Suppliers	[ ]	[ ]	[ ]	[ ]	[ ]	[ ]
g. Other parts of your firm	[ ]	[ ]	[ ]	[ ]	[ ]	[ ]
h. Other firms/consultants	[ ]	[ ]	[ ]	[ ]	[ ]	[ ]
i. No request made	[ ]	[ ]	[ ]	[ ]	[ ]	[ ]
j. Other (conferences, literature, etc.) _____	[ ]	[ ]	[ ]	[ ]	[ ]	[ ]

Comments:

BEFORE COPYING FORM ATTACH SITE IDENTIFICATION LABEL OR ENTER

SITE NAME MAPCO ALASKA PETROLEUM Inc.
North Pole Refinery
1100 H & H Lane
North Pole, AK 99705

EPA ID NO A K D 0 0 0 8 5 0 7 0 1

State of Alaska
Department of
Environmental Conservation

1988 Hazardous Waste Generation and Shipment Report

FORM
WM

WASTE MINIMIZATION

PART II

WHO MUST COMPLETE THIS FORM?

Form WM Part II must be completed only by generators that engaged in an activity during 1988 that resulted in waste minimization.

Waste minimization means:
(1) reduction in the volume and/or toxicity of hazardous waste generated as a result of source reduction; and/or,
(2) reduction in the volume and/or toxicity of hazardous waste subsequently treated, stored, or disposed as a result of on-site or off-site recycling.

[X] Mark [X] and do not complete this form if no waste minimization results were achieved during 1988.

INSTRUCTIONS:

Please read the detailed instructions beginning on page 26 of the 1988 Hazardous Waste Generation and Shipment Report Instructions booklet before completing this form.

Make and complete a photocopy of this form for each hazardous waste minimized in 1988.

Complete Sections I through IV. Throughout this form enter "DK" if the information requested is not known or is not available; enter "NA" if the information requested is not applicable.

Sec I

A. EPA hazardous waste code Instruction Page 27

B. State hazardous waste code Page 27

C. Product or service description Page 27

D. Product or service SIC code Page 27

E. Waste form code Page 27

F. UOM Page 28

G. Density Page 28 ssr gal sg

H. Source description: Page 28

I. Source code Page 28

Sec II

A. [illegible] quantity generated Instruction Page 29

B. [illegible] quantity generated Page 29

C. Production ratio Page 29

D. Toxicity change code Page 31

E. Waste minimization: recycling Page 31
Code 1. 2.
Quantity recycled

F. Waste minimization: source reduction Page 32
Code 1. 2. 3.
Quantity prevented

Sec III

A. Narrative description of waste minimization project or activity and results achieved Instruction Page 39

OVER —>

Sec. IV.	**Instructions:** Answer questions 1 through 4. Mark ☒ next to the effects produced by the source reduction and/or recycling activity reported on this form in Sections I through III.

1. What effect did this site's source reduction and/or recycling activity have on the **quantity** of **water effluent** produced by hazardous waste generation processes during **1988**?

   ☐ a. Increase in the quantity of water effluent

   ☐ b. Decrease in the quantity of water effluent

   ☐ c. No effect on the quantity of water effluent

   ☐ d. Don't know

2. What effect did this site's source reduction and/or recycling activity have on the **toxicity** of **water effluent** produced by hazardous waste generation processes during **1988**?

   ☐ a. Increase in the concentration of hazardous constituents

   ☐ b. Decrease in the concentration of hazardous constituents

   ☐ c. No effect on the concentration of hazardous constituents

   ☐ d. Don't know

3. What effect did this site's source reduction and/or recycling activity have on the **quantity** of **air emissions** produced by hazardous waste generation processes during **1988**?

   ☐ a. Increase in the quantity of air emissions

   ☐ b. Decrease in the quantity of air emissions

   ☐ c. No effect on the quantity of air emissions

   ☐ d. Don't know

4. What effect did this site's source reduction and/or recycling activity have on the **toxicity** of the **air emissions** produced by hazardous waste generation processes during **1988**?

   ☐ a. Increase in the concentration of hazardous constituents

   ☐ b. Decrease in the concentration of hazardous constituents

   ☐ c. No effect on the concentration of hazardous constituents

   ☐ d. Don't know

Comments:

APPENDIX 3
MANIFEST MPRO2

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved OMB No. 2050-0039. Expires 9-30-88

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.: AKD008507701

Manifest Document No.: HPR02

2. Page 1 of 2

Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address
NAPCO ALASKA PETROLEUM Inc.
1100 H & H Lane
North Pole, AK 99705

4. Generator's Phone (907) 488-2741

A. State Manifest Document Number: NA

B. State Generator's ID: NA

5. Transporter 1 Company Name: Carlile Enterprises

6. US EPA ID Number: AKD122081243

C. State Transporter's ID:

D. Transporter's Phone: 907-276-7797

7. Transporter 2 Company Name: Alaska Cargo Transport

8. US EPA ID Number: WAD051251957

E. State Transporter's ID:

F. Transporter's Phone: 907-562-3535

9. Designated Facility Name and Site Address
Crosby & Overton Inc.
20245 76th Ave. South, PO Box 1085
Kent, WA 98032

10. US EPA ID Number: WAD991281767

G. State Facility's ID:

H. Facility's Phone: 206-872-8030

GENERATOR

	HM	11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a.		RQ, Hazardous Waste Liquid N.O.S. ORME NA 9189 (K-050)	1	DM	55	G	K050
b.		RQ, Hazardous Waste Liquid N.O.S. ORME NA 9189 (D001)	1	DM	85	G	D001
c.		Hazardous Waste Liquid N.O.S. ORME NA 9189 (F002)	1	DM	15	G	F002
d.		RQ, Waste Combustible Liquid, N.O.S. ORME NA 1993 (F002, D001)	1	DM	40	G	F002, D001

J. Additional Descriptions for Materials Listed Above
a. NA-0562
b. NA-0563
c. NA-0570
d. NA-0571

K. Handling Codes for Wastes Listed Above

15. Special Handling Instructions and Additional Information
a. RQ 1 pound
b. RQ 1 pound
c. RQ 1 pound

16. **GENERATOR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.

If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; **OR**, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name: Kathleen McCullom Buscovich | Signature: K. Buscovich | Month 12 Day 13 Year 86

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name: [illegible] | Signature: [illegible] | Month 12 Day [illegible] Year [illegible]

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name: | Signature: | Month Day Year

FACILITY

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Printed/Typed Name: | Signature: | Month Day Year

Continuation Sheet

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved OMB No. 2050-0039. Expires 9-30-88

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. AKD000850701

Manifest Document No. NPR02

2. Page 1 of 2

Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address
MAPCO ALASKA PETROLEUM Inc.
1100 H & H Lane
North Pole, AK 99705

4. Generator's Phone (907) 488-2741

A. State Manifest Document Number

B. State Generator's ID

5. ~~Transporter 1~~ Company Name Transporter 3
Crosby & Overton Inc.

6. US EPA ID Number WAD991281767

C. State Transporter's ID

D. Transporter's Phone 206-872-8030

7. Transporter 2 Company Name

8. US EPA ID Number

E. State Transporter's ID

F. Transporter's Phone

9. Designated Facility Name and Site Address

10. US EPA ID Number

G. State Facility's ID

H. Facility's Phone

11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)	HM	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a.						
b.						
c.						
d.						

J. Additional Descriptions for Materials Listed Above

K. Handling Codes for Wastes Listed Above

15. Special Handling Instructions and Additional Information

16. **GENERATOR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.

If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; **OR**, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name | Signature | Month Day Year

GENERATOR

17. ~~Transporter 1~~ Acknowledgement of Receipt of Materials Transporter 3

Printed/Typed Name | Signature | Month Day Year

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name | Signature | Month Day Year

TRANSPORTER

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Printed/Typed Name | Signature | Month Day Year

FACILITY

Style F15REV-6 Labelmaster, Div. of American Labelmark Co. 60646 (312) 478-0900

EPA Form 8700-22 (Rev. 9/86) Previous editions are obsolete.

GENERATOR COPY

NOTIFICATION OF WASTE SUBJECT TO LAND DISPOSAL RESTRICTIONS

Generator Name: MARCO ALASKA Petroleum Inc EPA ID# AKD000850701
Address: 400 Hot H Lane City: North Pole, AK
State: Alaska ZIP:
EPA Hazardous Waste Number: K-050
Crosby and Overton WPQ# Manifest Number Associated with Waste Shipment: NPR02

Pursuant to 40 CFR 268.7(a) and 40 CFR 268.7(b), I hereby notify Crosby and Overton that this waste shipment contains a a waste(s) that is (are) restricted under the land disposal restrictions contained in either 40 CFR 268 or RCRA Section 3004(d). This shipment contains one or more of the following wastes (circle one) which are subject to the listed treatment requirements:

	WASTE (circle one)	TREATMENT STANDARD
A)	Liquid hazardous wastes having a pH less than or equal to two (2):	Neutralization, and/or Solidification
B)	Liquid hazardous waste including free liquids associated with any solid or sludge containing free cyanides at concentrations greater than or equal to 1000 mg/l	Cyanide Desruction
C)	Liquid hazardous wasted, including free liquids associated with any solid or sludge, containing the following metals (or elements) at concentrations greater than or equal to those specified below: (circle those that apply) (i) Arsenic and/or compounds (as As) 500 mg/l; (ii) Cadmium and/or coumpounds (as Cd) 100 mg/l; (iii) Chromium (VI) and/or compounds as Cr (VI) 500 mg/l; (iv) Lead and/or compounds (as Hg) 20mg/l; (v) Mercury and/or compounds (as Hg) 20 mg/l; (vi) Nickel and/or compounds (as Ni) 134 mg/l; (vii) Selenium and/or compounds (as Se) 100 mg/l; and (viii) Thallium and/or compounds (as Tl) 130 mg/l.	Metals Recovery Solidification
D)	Liquid hazardous wastes containing polychlorinated biphenyls (PCBs) at concentrations greater than or equal to 50 ppm	Incineration, high efficiency boiler, other thermal treatment
E)	The hazardous wastes identified in 40 CFR 261.31 as waste codes F001, F002, F003, F004, F005, F006, F020, F021, F022 F023, F026, F027, F028, K001, K004, K008, K012, K015, K016 K018, K020, K021, K022, K024, K025, K030, K036, K037, K044, K045, K046, K047, K048, K049, K050, K051, K052, K060, K061, K062, K069, K073, K086, K099, K100, K101, K102, or K106.	Circle all applicable constituents or attached Tables CCW and CCWE found in the waste
F)	Wastewaters containing between 1000 mg/l and 10,000 mg/l of total halogenated organic compounds (HOC) found in Appendix III of 40 CFR 268.	Incineration, Carbon Absorption, Steam Strippig, Solvent Extraction, Other
G)	The discarded commercial chemical product wastes specified in 40 CFR 261.33(e) as Waste Codes: F001, 4, 5, 10, 11, 12, 15, 16, 18, 20, 30, 36, 37, 39, 41, 48, 50, 58, 59, 68, 69, 78, 71, 81, 82, 84, 87, 89, 92, 94, 97, 102, 105, 108, 110, 115, 12, 122, or 123.	No land disposal allowed unless the generator provides EPA Regional Administrator with "Soft Hammer" certification as to no practible alternative to land disposal.

H) The discarded commercial chemical products specified in 40 CFR 261.33(f) as Waste Codes: U007, 9, 10, 12, 16, 18, 19, 22, 29, 31, 36, 37, 41, 43, 44, 46, 50, 51, 53, 61, 63, 64, 66, 67, 74, 77, 78, 86, 89, 103, 105, 108, 115, 122, 124, 129, 130, 133, 134, 137, 151, 154, 155, 158, 159, 171, 177, 180, 185, 188, 192, 200, 209, 210, 211, 219, 220, 221, 223, 226, 227, 228, 237, 238, 248 or 249.

No land disposal allowed unless the generator provides EPA Regional Administrator with 'Soft Hammer' certification as to no practible alternative to land disposal.

I) The hazardous wastes identified by EPA in 40 CFR 261.31 as Wastes Codes F007, F008, F009, F019, K011, K013, K014, K017, K031, K035, K084, K085.

No land disposal allowed unless the generator provides EPA Regional Administrator with 'Soft Hammer' certification as to no practice alternative to land disposal.

J) Deadline Extensions-Certain LDR restricted wastes are permitted to be placed in a land disposal unit after the deadline provided they meet the right condition. Restricted wastes which qualify for a deadline extension are as follows:

1)November 8, 1988 for the following wastes:
- i) F-solvents from small quantity generators,
- ii) all F-solvents from CERCLA or RCRA corrective actions,
- iii) 1% F-solvent mixtures,
- iv) the treatment residues from i, ii, iii above,
- v) F-dioxin wastes,
- vi) non-wastewater liquid HOC) 1000 mg/l
- vii) HOC) 1000 mg/l which is non-liquid, which is not contaminated soil or debris, and which is not from a CERCLA site or RCRA corrective action.

2)July 8, 1988 for the following wastes:
- i) all liquid and non-liquid HOC waste not previously banned except contaminated soil or debris from a CERCLA response or RCRA corrective action.

3)May 8, 1990 for the following wastes:
- i) all First-third waste for which treatment standards have not been set (i.e., soft-hammer wastes).

4)August 8, 1990 for the following wastes:
- i) K048, K049, K050, K051, K052, K061, (15% zinc), K071,
- ii) First-Third wastes which are contaminated soil and dibris, and have treatment standards based on incineration.

5)November 8, 1990 for the following wastes:
- i) F-solvents, F-dioxins, and HOC which is contaminated soil.

The most recent copy of waste analysis or a description of the knowledge upon which this notification is based is attached.

I hereby certify that all information submitted in this and all associated documents is complete and accurate to the best of my knowledge and information.

K Bisnovich Environmental Coordinator 12/12/88

Signature Title Date

COMBINED UNIFORM STRAIGHT BILL OF LADING AND FREIGHT BILL ORIGINAL — NOT NEGOTIABLE

CARLILE ENTERPRISES, INC.
1524 Ship Avenue
Anchorage, AK 99501
(907) 276 -7797 / 274 -1853

CONTROL NUMBER
219630
SHIPPER'S NUMBER

ICC NO. MC 153893

RECEIVED, subject to the classification and tariffs in effect on the date of the issue of this Bill of Lading,

FROM Mapco Petro. AGENT'S NO.

AT North Pole AK DATE 12-17-88 19

the property described below, in apparent good order, except as noted (contents and condition of contents of packages unknown), marked, consigned and destined as shown below, which said company (the word company being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its own railroad, water line, highway route or routes, or within the territory of its highway operations, otherwise to deliver to another carrier on the route to said destination, it is mutually agreed, as to each carrier of all or any of said property over all or any portion of said route to destination, and as to each party at any time interested in all or any of said property, that every service to be performed hereunder shall be subject to all the conditions not prohibited by law, whether printed or written, herein contained, including the conditions on back hereof, which are hereby agreed to by the shipper and accepted for himself and his assigns.

CONSIGNED TO: Mardock (Mail or street address of consignee — for purposes of notification only.)

Attn: Dave Seay

ADDRESS ROUTE

CITY Anchorage AK

DELIVERING CARRIER TRAILER NO. U-2 TRUCK NO. C-11

COLLECT ON DELIVERY

$ _____ and remit to: _____
Street City State

THIRD PARTY BILLING ADDRESS (Third-party billing does not relieve consignor or consignee of responsibility for all charges)

Street City State

Prepaid ☑ Collect ☐ Third Party Billing ☐

NUMBER PACKAGES	* HM	DESCRIPTION OF ARTICLES, SPECIAL MARKS, AND EXCEPTIONS Proper Shipping Name for Hazardous Materials. (contents and condition of contents of packages unknown)	Hazardous Class	UN or NA #	*WEIGHT (SUB. TO COR.)	RATE	FREIGHT
41		Drum Hydrogen Mat.					
		See Attached paperwork					

*If the shipment moves between two points by a carrier by water, the law requires that the bill of lading state whether it is "carrier's or shipper's weight."

Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property. The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding (if intrastate, see Section 11):

_____ per _____

Subject to Section 7 of conditions, if this shipment is to be delivered to the consignee without recourse on the consignor, the consignor shall sign the following statement:
The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges.

(Signature of Consignor)

Received $ _____ to apply in prepayment of the charges on the property described hereon.

Agent of Carrier

Per _____
(The signature here acknowledges only the amount prepaid.)

C.O.D. FEE	
ADVANCES	
PREPAID TO APPLY	
TOTAL OR BALANCE DUE	

DANGEROUS ARTICLES CERTIFICATION: This is to certify that the above-named articles are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation, according to the applicable regulations of the Department of Transportation.

Signature of Shipper: K Bisnovich

RECEIVED the above specified property in apparent good order. _____ (AM) (PM) TIME

X _____ / /8
FOR CONSIGNEE DATE

ORIGINAL FREIGHT BILL MUST ACCOMPANY CLAIM FOR OVERCHARGE, LOSS OR DAMAGE

SHIPPER K Bisnovich
BY 12/13/88 DATE 10:30 (AM) (PM) TIME

CARLILE P/U Dan Shane BY 12-13-88 DATE _____ (AM) (PM) TIME

CARLILE DEL _____ BY _____ DATE _____ (AM) (PM) TIME

SHIPPER

APPENDIX 4
GENERIC JOB DESCRIPTION

MAPCO PETROLEUM Inc. - Alaska
North Pole Refinery
Quality Control Department

POSITION: Chemist B

CHARTER: The Chemist B is responsible for special project work consisting of complicated, in depth testing, and the maintenance and testing of advanced pieces of laboratory equipment.

RESPONSIBILITIES: The Chemist B, directly and through others, accomplishes the following:

1. Troubleshoots process problems and develops methods for testing and/or computerization of various aspects of the laboratory function.

2. Operates, maintains, analyzes, and repairs laboratory equipment, including but not limited to: gas chromatograph and atomic absorption spectrophotometer.

3. Trains Quality Control personnel to perform ASTM testing on NPR products as directed.

4. Provides accurate and timely information to the Quality Control Superintendent on problems, product trends, and testing observations; coordinates problem resolution with Superintendent.

5. Develops streamlined training manuals for non-ASTM training, including but not limited to: Sulfolane testing, computer system procedures, inventory system procedures.

6. Pulls routine and non-routine samples from various on and/or off-site locations in a safe and timely manner, including but not limited to gas samples for chromatography analysis.

7. Performs the duties of Lab Tester and Lab Technician as necessary.

8. Initiates work requests relative to areas of responsibility and submits to the Quality Control Superintendent for approval.

9. Maintains compliance with all Federal, State, and MAPCO policies regarding the safe and legal disposal of all substances deemed hazardous or otherwise requiring special handling techniques.

10. Maintains compliance with Material Safety and Data Sheets for each chemical utilized in areas of responsibility, and assists in directing personnel in established procedures and precautions.

11. Maintains compliance and adheres to MAPCO's safety operating procedures including hot work permits; remains knowledgeable on the proper use of all emergency equipment including the fire truck and its related systems, fire entry suits, and Scott Air Packs. Participates in the fire brigade if necessary.

12. Maintains the clean and orderly appearance of the laboratory and grounds within area of responsibility.

13. Participates in and/or directs both informal and formal training sessions.

14. Responsible for maintaining laboratory inventory system as directed.

RELATIONSHIPS: Reports directly to the Quality Control Superintendent or his/her designee.

CREDENTIALS: Minimum six (6) years of responsible refinery experience as a quality control technician

or

two (2) years responsible refinery experience as a quality control technician, plus a B.S. degree in Chemistry.

Demonstrated ability in performing the required record keeping in an accurate and timely manner; demonstrated ability in using mathematics to perform calculations. Proven oral and written communication abilities. Knowledge of computers and applications is preferred.

The ability to earn and maintain an Alaska Drivers License and a Red Cross First Aid Card. G o o d general health and the ability to perform the physical duties of the position.

This Job Description has been read, understood, and approved by the undersigned. The Incumbent's signature below affirms that the Incumbent has received a copy of this document.

Incumbent: Jim G. Schrecht 3/23/87 (date)

Quality Control Supt.: PK Rivers-Harrell 3-23-87 (date)

General Manager: D. S. Fitz 3-13-87 (date)

kb
02-05-87

APPENDIX 5
PHOTOGRAPHS

Photographs taken at MAPCO on March 21, 1989

Photographs taken by Richard Cormack using Olympus OM-1 camera and Kodacolor 100 ASA film.

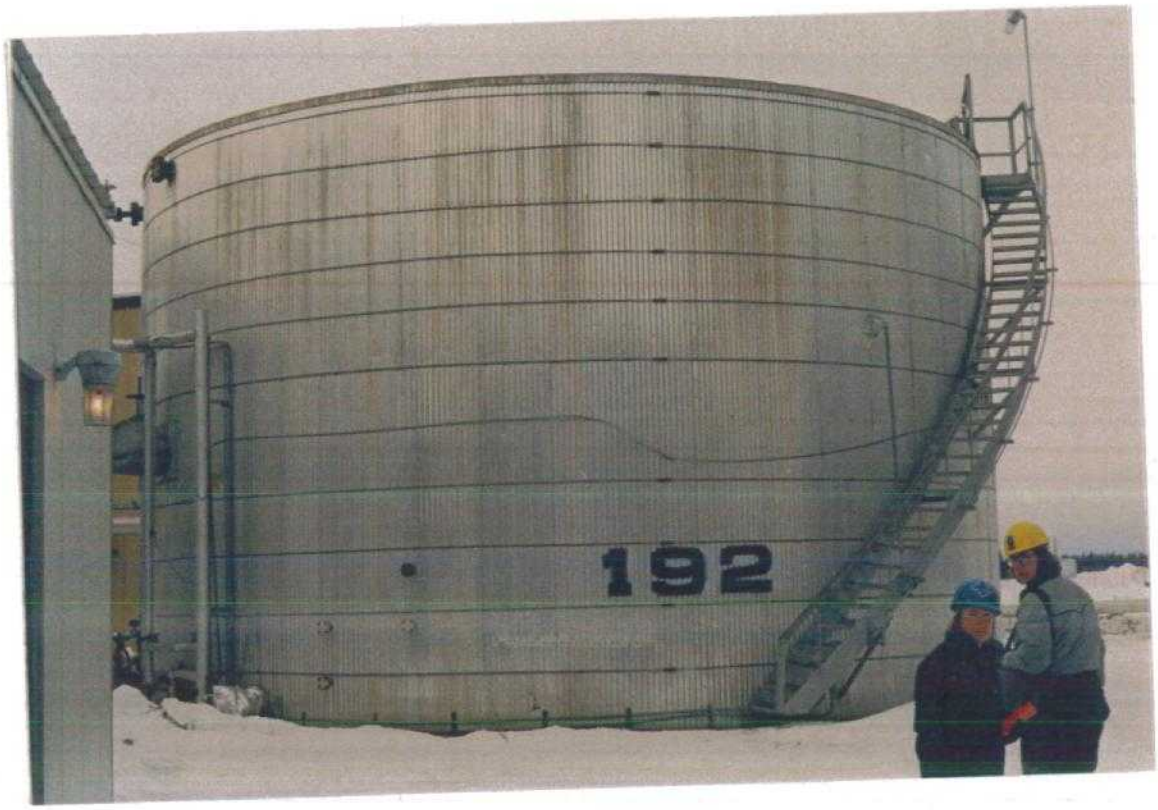
1. Shop dip tanks
2. Hot kerosene bath
3. Sump 901
4. Tank 192
5. Sump 906 (foreground), sump 907 (background)
6. Lagoon B
7. Sump 901b (appeared to be some question on this one)
8. Hazardous waste accumulation site
9. Hazardous waste accumulation site, closeup of signs
10. Heat exchangers (typical source of K050)
11. Laboratory building
12. Sump 05-7
13. Product sample point

PHOTOGRAPHS- MAPI, PAGE ONE, MARCH 21, 1989

#1

#2

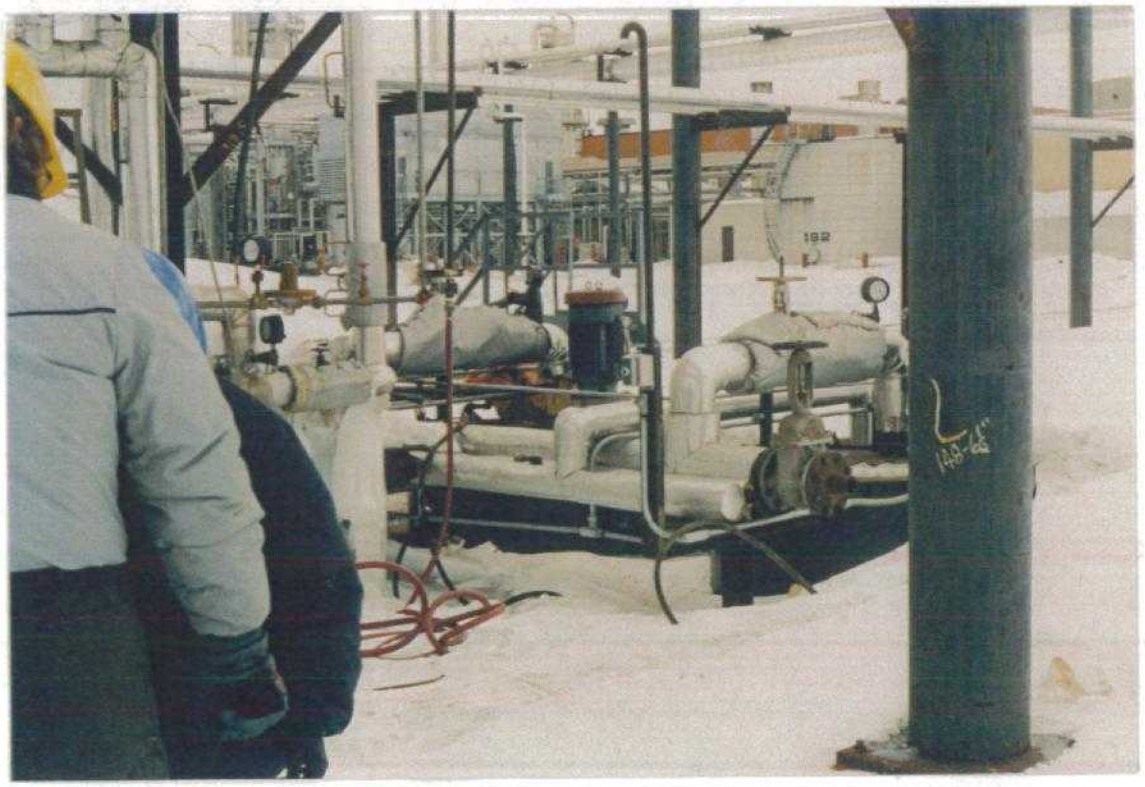
#3



#4

#5

#6



#7

#8

DANGER
NO
SMOKING
UNAUTHORIZED
PERSONNEL
KEEP OUT
AGE DRUM

#9

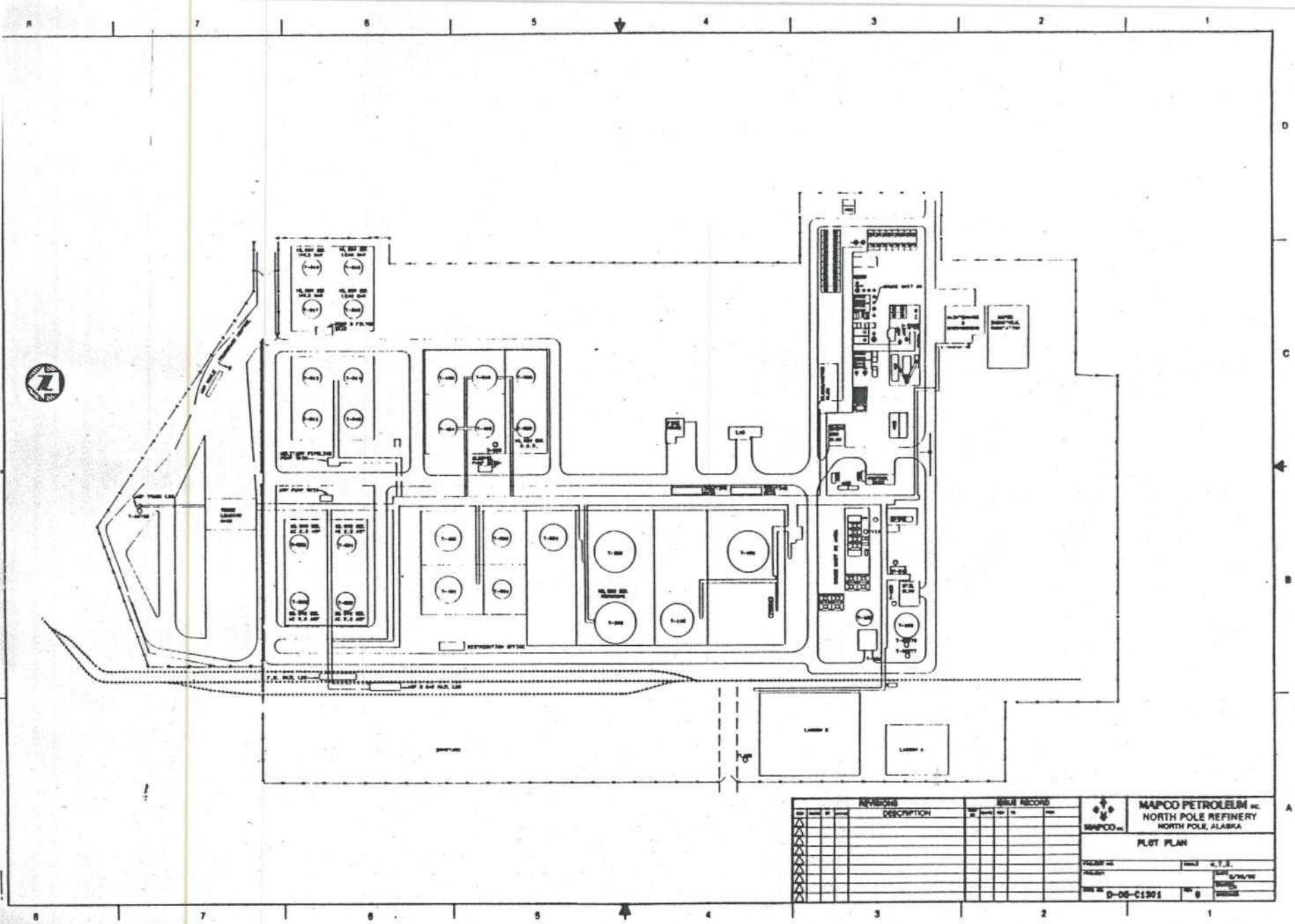
#10

#11

#12

#13

APPENDIX 6
SITE MAP


REVISIONS
DESCRIPTION
ISSUE RECORD
MAPCO PETROLEUM INC.
NORTH POLE REFINERY
NORTH POLE, ALASKA
PLOT PLAN
D-05-C1301

APPENDIX 7
RCRA CEI CHECKLIST

RESOURCE CONSERVATION AND RECOVERY ACT (RCRA)

Region 10 Inspection Checklist

Purpose--This checklist is designed to serve as a guideline to the major points of the regulations adopted pursuant to RCRA for inspectors to use while visiting hazardous waste (HW) regulated facilities. This checklist should not serve as a substitute for a detailed knowledge of the relevant regulations. The following is the outline of the checklist.

I. General Information
II. Small Quantity Generator (SQG) Regulations (40 CFR 261.5)
III. Generator Regulations (40 CFR 262)
IV. Transporter Regulations (40 CFR 263)
V. Treatment, Storage, and Disposal (TSD) Interim Status Regulations (40 CFR 265)
VI. Treatment, Storage, and Disposal (TSD) Permit Status Regulations (40 CFR 264)

I. General Information (Date Revised November 21, 1983)

A. Date/Time Inspection commenced: March 21, 1989 9:30 a.m.

B. Facility

EPA/State ID AKD00085070

Name & Addresses MAPCO Alaska Petroleum Inc.

1. Mailing: 1100 H & H Lane
2. Location: 1100 H & H Lane
North Pole, Alaska 99705

Contact: Kathleen McCullom-Buscovich

Telephone: (907) 488-2741 Ext. 233

C. Compliance Summary

	IN	OUT	N/A
RCRA (Statute)	(✓)	( )	( )
40 CFR 270	(✓)	( )	( )
40 CFR 124	( )	( )	(✓)
40 CFR 261.5	( )	( )	(✓)
40 CFR 262	(✓)	( )	( )
40 CFR 263	(✓)	( )	( )
40 CFR 264 (Permit)	(✓)	( )	( )
40 CFR 265	( )	(✓)	( )

Specific Violations: No violations discovered as a SMQG

RECEIVED
JUL 1988
DEPT. OF ENVIRONMENTAL CONSERVATION

D. Inspector

Name (Print) Pion Lillich Title: Scientist

Signature Pionne J. Lillich

Organization DEC

Phone (907)-465-2671

E. **Inspection Participants:**

Name	Title	Phone #
Jeff Ingalls	EFO, DEC	(907)-465-2671
Leslie Simmons	EFO, DEC	(907)-452-1714
Kathleen McCullom Buscovich	MAPI, Env. Coord.	(907)-488-2741
Gerald Fritz	MAPI Gen. Mgr.	" "
David Dowse	Eng. Mgr.-MAPI	" "

F. **Notification/Permit Information**

1. Started operation: 10/77 Date: _____
2. Notification filed: (YES) NO Date: 1987
3. Part A application filed: YES (NO) Date: _____
4. Part B called/Date Due YES (NO) Date: _____
5. Part B application: YES (NO) Date: _____
6. Changes in Notification or Part A: None
7. Facility's classified as:

Generator	Y
Transporter	( )
Treatment facility	( )
Storage facility	Y
Disposal facility	Y
Small quantity generator	Y
Recycler	( )
Less than 90 day storage	( )
Wastewater treatment unit exemption (WWTU)	( )
Elementary neutralization unit exemption (ENU)	( )

8. Does facility have a Part A withdrawal request in ? YES (NO)

Status _____

Comments: _____

6. Hazardous Waste Generation (HW) and Management (List EPA Waste Code)

1. General information See Report Narative

a. Characteristic HW (DXXX)?

(1) Ignitability D001
(2) Corrosivity
(3) Reactivity
(4) EP Toxicity D009, D008

b. Listed HW?

(1) HW from non-specific sources (FXXX)
F002

(2) HW from specific sources (KXXX)
K050

c. Discarded commercial chemical product (PXXX or UXXX)
potentially from lab

(1) PXXX
(2) UXXX

d. Has facility petitioned to delist waste? YES (NO)

Date: Comments:

e. Does facility qualify for WWTU or ENU? YES (NO)

Comments:

f. Has a determination been made for each waste generated that it is or is not a RCRA hazardous waste? YES

(1) What are the wastes generated? VARIOUS - See Narrative

(2) How was the hazardous waste determination made for each waste (i.e., lab analyses, knowledge of waste streams or processes, waste listed in Part 261)?

Comments: Some on knowledge i.e. K050 and Some on analysis i.e. D001 Sump sludge

(3) Are records available on the determination(s)? (YES) NO

(4) Are all hazardous wastes noted during inspection listed on the facility's RCRA notification/ Part A application? YES NO

If so explain. → Incorrect wastes listed on facility's notification.

2. Specific information
Provide the following information for each of the individual HW streams listed above. (Complete a separate form for each HW.)

See Narrative Report

a. EPA HW Code
b. HW description
c. Composition (including sampling requirements)
d. Process producing waste:
e. Rate of waste production
f. Time of storage
g. Waste handling prior to disposal
h. Waste disposal practice and manifest
i. Reporting and recordkeeping
j. Comments

H. <u>Miscellaneous Notes</u>:

II. Small Quantity Generator (SQG) Regulations 40 CFR 261.5 (Date Revised November 21, 1983)

N/A

A. General

1. Has the generator ever accumulated more than 1000 kilograms of D, F, K or U coded HW or 1 kilogram of P coded HW [261.5(f)]? YES NO

   a. If yes, generator must comply with the generator regulations (262) and if stored for more than 90 days the applicable TSD regulations. Refer to Generator and/or TSD inspection checklist.

B. Small Quantity Generator (SQG) Regulations

1. A SQG must determine if he generates a hazardous waste (262.11). YES NO

2. Which of the following describes the SQG's treatment and/or disposal of his HW?

   a. occurs on-site YES NO

   b. ensure delivery to an off-site facility, either of which is:

      (1) permitted under Part 270 YES NO

      (2) in interim status under Part 270 and 265 YES NO

      (3) authorized to manage HW by an authorized state YES NO

      (4) permitted, licensed or registered by a State to manage municipal or industrial solid waste; or YES NO

      (5) (a) facility which

         (a) beneficially uses, re-uses recycles or reclaims his HW YES NO

         b. treats his waste prior to use, re-use, recycle, or reclamation YES NO

3. Does generator manifest his wastes (not required)? YES NO

III. Generator Regulations 40 CFR 262 (Date Revised November 21, 1983)

A. Is the facility or does facility claim to be a small quantity generator? YES NO

Comments:_____

B. Does generator transport its own waste? YES NO

1. If NO, what is contractor's EPA ID, name, address, and phone? • Carlile Enterprises AKD122081243 & • Alaska Cargo Transport WAD051251957

2. If YES, see Transporter Regulations (Section III).

C. Does generator use the manifest system? YES NO

1. Does the Generator ever offer his hazardous waste to transporters or to TSD facilities which do not have an EPA ID number? YES NO

What transporters or TSD facilities?

2. A generator transporting or offering for transport hazardous waste for off-site TSD must first prepare a manifest.

3. If the waste is undeliverable to the primary or alternate facility, the generator must either designate another alternate facility or instruct the transporter to return the waste.

Does the manifest contain the following information:

a. Manifest document number YES NO

b. Generator's name, mailing address, phone number, and EPA ID number YES NO

c. Name and ID number of each transporter YES NO

d. Name, address and EPA ID number of the designated and alternate TSD facilities, if any. YES NO

e. Description of waste(s) required by DOT regulations in 49 CFR 172.101, 172.202, 172.203. YES NO

- Proper shipping name YES NO
- Hazard Class YES NO
- Identification number YES NO

f. Total quantity of each hazardous waste by units of weight or volume and type and number of containers placed aboard transport vehicle. YES NO

4. Does the manifest contain the certification attesting to proper classification, description, packaging, labeling, marking and condition in accordance with DOT and EPA regulations? YES NO

5. Does the manifest contain an adequate number of copies to provide one copy for:

   a. Generator's records YES NO

   b. Records of each transporter YES NO

   c. TSD facility owner or operator's records YES NO

   d. Signature by each transporter and return to generator YES NO

   e. Signature by TSD facility and return to generator YES NO

6. Does the generator use the manifest properly by:

   a. Signing the certification YES NO

   b. Obtaining signature and date of acceptance from initial transporter YES NO

   c. Retaining one copy of the transporter's signed manifest for 3 years or until receipt of a signed copy from disposal facility YES NO

   d. Giving transporter the remaining copies of the manifest YES NO

7. Does the generator contact the transporter and/or the designated TSD facility to determine the shipment status in the event that a signed copy from the designated facility has not been received within 35 days? N/A YES NO

8. Does the generator submit an Exception Report to the U.S. EPA in the event that a signed copy of the manifest has not been received from the designated TSD facility within 45 days? N/A YES NO

9. The Manifest Exception Report must include

   a. A legible copy of the manifest and

   b. A letter of explanation describing efforts and results of status investigation.

********** TSD FACILITIES SKIP TO MODULE V **********

D. Does generator operate a specific area on-site for container handling or storage? YES NO

1. Does generator comply with the requirements set forth in governing on-site waste accumulation: YES NO

   a. Labeling and marking YES NO

   b. Dating YES NO

   c. Inspections (weekly for containers) YES NO

2. Are incompatible wastes segregated? N/A YES NO

3. What quantities of HW are stored? 1 drum - spent kerosene-D001

4. What is the longest period that it has been stored? dated 1/12/89

5. Were there any hazardous wastes stored on site at the time of inspection? (90 day storage allowance is allowed only if waste is stored in accordance with §262.34; i.e. must be stored in containers or tanks. Thus need to make note if storing in waste pile, etc.) YES NO

   a. If yes, do they appear properly packaged (if in containers) or, if in tanks, are the tanks secure? YES NO

   b. If not properly packaged or in secure tanks, please explain. N/A YES NO

   c. Are containers clearly marked and labeled? YES NO

   d. Do any containers appear to be leaking? YES NO

   e. If yes, approximately how many? N/A

6. Generators may store hazardous waste for less than 90 days without a permit or TSD status providing certain requirements have been met. YES NO

a. Are the containers made of or lined with materials which will not react with and are compatible with the hazardous waste to be stored in them? YES NO

b. Are the containers always closed, except to add or remove waste? YES NO

c. Are container storage areas inspected weekly for leaks and container deterioration (40 CFR 265.174)? YES NO

d. Are precautions taken to prevent accidental ignition or reaction of ignitable or reactive waste? YES NO

e. Are containers holding ignitable or reactive waste located at least 50 feet from the facility's property line? YES NO

f. Is the facility aware of and complying with the following requirements for incompatible wastes: N/A - no incompatibles observed

(1) Incompatible wastes must not be placed in the same containers, unless in compliance with 265.17(b) YES NO

(2) HW must not be placed in an unwashed container that previously held an incompatible waste YES NO

(3) Are storage containers holding HW that are incompatible with any waste or other material stored nearby separated from or protected from them by means of a dike, berm, wall, or other device? YES NO

Explain?

g. Are containers marked or labeled in a manner equivalent to 40 CFR 172 subpart E? YES NO

h. Comments:

7. a. Does the generator import or export HW? YES NO

b. If yes, has notification of this activity been submitted to the EPA Regional Administrator? YES NO

c. Is a copy of that notification available? (If yes, obtain copy). YES NO

d. If a copy is not available, or can not be obtained, determine: 1) when the notification was submitted; 2) for what waste type and; 3) for what foreign facility (name and address). YES NO

8. TANKS - N/A - no hazardous waste storage tanks

Where tanks are used to store hazardous waste, the requirement of 40 CFR Part 265 Subpart J must be complied with (except 265.193), as follows:

a. Is storage in tanks conducted such that:

(1) It does not generated heat, pressure, fire, explosion or violent reaction? (If no, explain) YES NO

(2) It does not produce uncontrolled toxic mists, fumes, dusts, or gases? (If no, explain) YES NO

(3) It does not produce uncontrolled flammable fumes or gases? YES NO

(4) It does not damage the tank? YES NO

(5) It does not threaten the environment in other ways (i.e., leaks, spills)? YES NO

Comments:

b. Is 2 feet of freeboard maintained in uncovered tanks? YES NO

If no, is secondary containment used? YES NO

(Explain)

c. Is the tank(s) continuously fed? YES NO

If yes, is there a means to stop inflow? YES NO

Explain

d. Are inspections of the following conducted:

(1) Discharge control equipment? YES NO
How often?

(2) Waste feed cut-off systems? YES NO
How often?

(3) Data from tank monitoring equipment? YES NO
How often

(4) The level of waste in the tank? YES NO
How often?

(5) The structural integrity of tank? YES NO
How often?
How are inspections conducted?
What is observed (looked for)?

(6) The immediate area around the tank for signs of leaks and the integrity of secondary containment (if any)? YES NO

e. (1) Have any tanks once used for storage of hazardous waste been closed or their function changed? When?

(2) Were all hazardous wastes and/or residues removed? YES NO

(3) What was the disposition of the wastes or residues (i.e., where did it go)? YES NO

(4) When shipped?

f. Are ignitable or reactive wastes placed in tanks? YES NO

If yes, what measures are used to prevent ingnition or reaction?

g. Have wastes been placed in a tank which previously contained potentially incompatible waste or residue? YES NO

h. (1) If reactive or ignitable wastes are stored in covered tanks, are they in compliance with the National Fire Protection Association's buffer zone requirements? YES NO

(2) Are "No Smoking" signs posted? YES NO

(3) Have others measures been adopted to reduce hazards associated with storage of ignitable or reactive waste in tanks? YES NO

Explain

9. Preparedness and Prevention (265 Subpart C)

a. Is facility maintained and operated to minimize the hazards of fire, explosion, and sudden or non-sudden releases to the environment? YES NO

Explain:

b. Is internal emergency communication equipment or alarm systems installed? YES NO

What type?

c. Is a device (e.g., telephone) immediately available for summoning emergency assistance? YES NO

d. Are fire extinguishers or other emergency equipment immediately available on-site? YES NO

e. Is emergency communications and response equipment tested? YES NO

How often?

f. Is aisle space adequate for emergency response? YES NO

What is the aisle spacing? Only one drum

g. (1) Have any arrangements been made with local emergency response organizations? YES NO

(2) Which organizations? local North Pole organizations

(3) If local organizations have declined to enter into response agreements, is this documented in the facility's operating record? N/A YES NO

Explain

10. Contingency Plan/Emergency Procedures

a. Has contingency plan been developed? (It may be a modified SPCC plan) YES NO

b. Have incidents occurred where the plan has been implemented? YES NO

c. Have incidents occurred where the plan should have been implemented but was not YES NO

Explain

d. A copy of the plan should either be obtained for post-inspection office review or it should be examined during inspection for the following:

(1) Does the plan describe actions to be taken by personnel in response to fire, explosion, or releases to the environment? YES NO

(2) Does the plan describe arrangements made with external emergency response organizations? YES NO

(3) Does the plan list those qualified to act as emergency coordinator including their name, address, and phone? YES NO

(a) Is the list current? YES NO

(4) Is all emergency equipment available at the facility listed in the plan? YES NO

(a) Is the location and a description of the equipment included? YES NO

(b) Are capabilities described for each piece or equipment unit? YES NO

(5) Does the plan include evacuation procedures including a description of signals to initiate evacuation (and routes and alternative routes)? YES NO

(6) Is a copy of the plan maintained at the active facility (versus main office)? YES NO

(a) Has a copy been supplied to appropriate off-site emergency response organizations? YES NO

To which?

(7) Is at least one designated person always available to respond to emergencies (i.e., of those on the coordinator list)? YES NO

How are they available

What are the limits of this person's authority to respond to emergencies? None

(8) Has an emergency occurred? YES NO

Was the plan implemented? YES NO

(Describe the incident) N/A

11. Personnel Training

a. Has a training program been developed? YES NO

What type? (Classroom? On-the-job Training?)

b. Does the program include contingency plan and response training? YES NO

c. Does the program include measures to familiarize personnel with emergency response equipment, procedures, and systems including:

(1) Procedures for using and maintaining equipment? YES NO

(2) Key parameters for automatic waste feed cut-off? YES NO

(3) Communications or alarm equipment? YES NO

(4) Response to fire and explosion? YES NO

(5) Response to ground water contamination incidents? YES NO

(6) Facility shut down? YES NO

d. Are records available at the facility for the following:

(1) Job title for each position related to hazardous waste management and maintaining equipment? YES NO

(2) Written job description for each job title? YES NO

(a) Does the job description include the skill, education or qualifications required for the position? YES NO

(b) The duties assigned to that position? YES NO

(3) A written description of the type and amount of training to be given to those in each job position? YES NO

(4) A record of training completed or experience obtained for each job position by employee? YES NO

(5) Was the required training obtained within 6 months of employment or by May 19, 1981, by each individual involved in hazardous waste management activities? YES NO

E. Is Generator familiar with Generator Reporting Procedures?

1. Annual Reports YES NO
2. Exception Reports YES NO
3. Spills and Discharges into the Environment YES NO
4. Comments

F. Is generator aware of and complying with regulations concerning the preparation of hazardous waste for transport? YES NO

1. Packaging 40 CFR 173, 178, 179, and with requirements of STATE YES NO
2. Labeling 49 CFR 172 YES NO
3. Marking 40 CFR 172 YES NO
4. Placarding 49 CFR 172 Subpart F YES NO
5. Containers with of hazardous waste must be marked with the following or essentially equivalent, words and in information, displayed in accordance with 40 CFR 172.304.

HAZARDOUS WASTE - State and Federal Law prohibits improper disposal. If found, contact the nearest police or public safety authority, and the U.S. Environmental Protection Agency.

Generator's Name and Address
Manifest Document No. _____

6. Comments"

G. Are any wastes generated at this facility being transported or stored prior to being recycled, reclaimed, or recovered?

YES NO

1. -If yes, what are they_____

a. Sludge ( )
b. Characteristic HW ( )
c. Listed HW ( )
d. Comments

IV. Transporter Regulations (40 CFR 263) (Date Revised November 21, 1983)

NJA

A. Transporter facility description.

1. Operates as a Transfer Facility YES NO

2. Operates as a Storage Facility YES NO

3. Operates as a Generator YES NO

4. Imports Wastes YES NO

5. Combines Manifested Shipments YES NO

B. Does transporter have an EPA ID? YES NO

C. Does the transporter comply with generator regulations under Part 262 if he imports hazardous waste or combines wastes of different DOT shipping descriptions into a single container? YES NO

D. Does the transporter comply with storage regulations under Parts 270, 264, and 265 if he stores manifested shipments at a transfer facility for more than 10 days? YES NO

E. Is transporter aware of and complying with manifest requirements under RCRA 263.20?

1. Before transporting HW is manifest dated and signed by generator? YES NO

2. Does the transporter sign, date, and return a copy of the manifest to the generator before transporting waste off the generator's property? YES NO

3. Does the transporter delivering hazardous waste to another transporter or the designated facility:

a. Obtain a signed and dated (S/D) copy of the manifest? YES NO

b. Retain one copy of the manifest containing signatures of the generator, himself, next designated transporter or the designated TSD facility for 3 years from original manifest date? YES NO

c. Give remaining copies of the manifest to accepting transporter or designated facility? YES NO

4. Does transporter deliver the entire quantity of HW accepted to:

   a. The designated facility listed on the manifest? or — YES NO

   b. The alternate designated facility in the event the shipment cannot be delivered to the designated facility? or — YES NO

   c. The next designated transporter? — YES NO

5. If delivery is not possible, does the transporter contact the generator and revise the manifest according to instructions? — YES NO

F. In the event of a spill or discharge during transport, does the transporter comply with the requirements set forth in 40 CFR 263.30? — YES NO

   1. Give notice to generator — YES NO

   2. Give notice to the National Response Center (800-424-8802) if required by 40 CFR 171.15?

   3. Report in writing, as required by 40 CFR 171.16, to the Director, Office of Hazardous Materials Regulations, Materials Transportation Bureau, Department of Transportation, Washington, D.C. — YES NO

   4. Comments — YES NO

V. TREATMENT, STORAGE and DISPOSAL (TSD) Interim Status Regulations Facilities, 40 CFR 265. (Date Revised November 21, 1983)

A. Type of Activity → PAST ACTIVITIES - not presently being utilized or being in the process of being closed.

1. Storage

a. Containers	(✓)
b. Tanks	
(1) Above ground	( )
(2) Below ground	( )
c. Surface Impoundments	(✓)
d. Waste Piles	( )
e. Other	( )

2. Treatment

a. Settling	( )
b. Evaporation	( )
c. Filtration	( )
d. Energy Recovery	( )
e. Incineration	( )
f. Thermal Treatment	( )
g. Recycling/Recovery	( )
h. Chem/Phys/Biological	( )
i. Other	( )

3. Disposal

a. Landfill	( )
b. Land Treatment	( )
c. Surface Impoundment	( )
d. Incineration	( )
e. Other	( )

4. Comments:

5. Are hazardous wastes accepted from "outside" (off-site) sources(wastes not generated on site)? YES (NO)

   a. If YES, has a chemical and physical analysis of a representative sample been obtained in accordance with 40 CFR 265.13? YES NO

   b. Does the facility confirm that each hazardous waste received at the facility matches the identity of the waste on the manifest? YES NO

   c. How does the facility determine this?

B. Subpart B - General Facility Standards (40 CFR 265.10 - 265.17)

1. Does the facility obtain a detailed analysis of his waste prior to storing, treating, or disposing of it? YES NO

Describe:

2. Does the facility follow a Written Waste Analysis Plan Does the Plan include?

a. Parameters to be tested? YES NO
b. Methods of analysis? YES NO
c. Methods to get representative samples? YES NO
d. Testing frequency? YES NO

Comments:

3. Did inspector collect a copy of the Plan for a thorough review of it at EPA's offices? YES NO

4. Security

a. Have site owner/operators taken appropriate measures to ensure against unauthorized entry? YES NO

(1) Are signs posted at each entrance to active portion, and at other locations, in sufficient numbers to be seen by an approach? YES NO

(2) Are they legible from a distance of 25 feet or more? YES NO

(3) Does the facility have a 24-hour surveillance system or artificial or natural barrier/or combination of both, to control access to the active portion? YES NO

Comments:

5. Does the facility follow a Written Inspection Schedule (40 CFR 265.15? YES NO

a. Does it include inspecting all:
Monitoring equipment? YES NO
Safety and emergency equipment? YES NO
Security devices? YES NO
Detecting equipment? YES NO

Dangerous waste storage areas? YES NO

b. Is this inspection schedule maintained at the facility? YES NO

c. Is an inspection log maintained? YES NO

(1) Is the log, or its summary, kept at the facility for at least three years from the date of inspection? YES NO

(2) Does the log include:

(a) date of time of inspection? YES NO

(b) inspectors name? YES NO

(c) observations? YES NO

(d) date and nature of repairs? YES NO

Comments:

6. Personnel Training (40 CFR 265.16)

a. Has a training program been developed? YES NO
What Type? (Classroom/on-the-job)

b. Does the program include contingency plan and response training? YES NO

c. Does the program include measures to familiarize personnel with emergency response equipment, procedures, and systems including: YES NO

(1) Procedures for using and maintaining equipment? YES NO

(2) Key parameters for automatic waste feed cut-off systems. YES NO

(3) Communications or alarm equipment YES NO

(4) Response to fire and explosions YES NO

(5) Response to ground water contamination incidents? YES NO

(6) Facility shut down? YES NO

d. Are records available at the facility for the following:

(1) Job title for each position related to hazardous waste management and maintaining equipment? YES NO

(2) Written job description for each job title? YES NO

(a) Does the job description include the skill, education or qualifications required for the position YES NO

(b) The duties assigned to that position? YES NO

(3) A written description of the type and amount of training to be given to those in each job position? YES NO

(4) A record of training completed or experience obtained for each job position by employee YES NO

(5) Was the required training obtained within 6 months of employment or by May 19, 1981, by each individual involved in hazardous waste management activities? YES NO

C. Subpart C - Procedures and Preventions (40 CFR 265.30)

1. Is facility maintained and operated to minimize the hazards of fire, explosion, and sudden or non-sudden releases to the environment? YES NO

   Explain:

2. Is internal emergency communication equipment or alarm systems installed? YES NO

   What type?

3. Is a device (e.g., telephone) immediately available for summoning emergency assistance? YES NO

4. Are fire extinguishers or other emergency equipment immediately available on-site? YES NO

5. Is emergency communications and response equipment tested? YES NO

   How often?

6. Is aisle space adequate for emergency response? YES NO

   What is the aisle spacing?

7. Have any arrangements been made with local emergency response organizations? YES NO

8. Which organizations?

9. If local organizations have declined to enter into response agreements, is this documented in the facility's operating record? YES NO

   Explain

C. Subpart C - Procedures and Preventions (40 CFR 265.30)

1. Is facility maintained and operated to minimize the hazards of fire, explosion, and sudden or non-sudden releases to the environment? YES NO

   Explain:

2. Is internal emergency communication equipment or alarm systems installed? YES NO

   What type?

3. Is a device (e.g., telephone) immediately available for summoning emergency assistance? YES NO

4. Are fire extinguishers or other emergency equipment immediately available on-site? YES NO

5. Is emergency communications and response equipment tested? YES NO

   How often?

6. Is aisle space adequate for emergency response? YES NO

   What is the aisle spacing?

7. Have any arrangements been made with local emergency response organizations? YES NO

8. Which organizations?

9. If local organizations have declined to enter into response agreements, is this documented in the facility's operating record? YES NO

   Explain

D. Subpart D - Contingency Plan and Emergency Procedures 40 CFR 265.50

1. Has contingency plan been developed? (It may be a modified SPCC plan) YES NO

2. Have incidents occurred where the plan has been implemented? YES NO

3. Have incidents occurred where the plan should have been implemented but was not YES NO

   Explain

4. A copy of the plan should either be obtained for post-inspection office review or it should be examined during inspection for the following:

   a. Does the plan describe actions to be taken by personnel in response to fire, explosion, or releases to the environment? YES NO

   b. Does the plan describe arrangements made with external emergency response organizations? YES NO

   c. Does the plan list those qualified to act as emergency coordinator including their name, address, and phone? YES NO

      (1) Is the list current? YES NO

   d. Is all emergency equipment available at the facility listed in the plan? YES NO

      (1) Is the location and a description of the equipment included? YES NO

      (2) Are capabilities described for each piece or equipment unit? YES NO

   e. Does the plan include evacuation procedures including a description of signals to initiate evacuation (and routes and alternative routes)? YES NO

f. Is a copy of the plan maintained at the active facility (versus main office)? YES NO

(1) Has a copy been supplied to appropriate off-site emergency response organizations? YES NO
To which?

5. Is at least one designated person <u>always</u> available to respond to emergencies (i.e., of those on the coordinator list)? YES NO
How are they available

6. What are the limits of this person's authority to respond to emergencies?

a. Has an emergency occurred? YES NO

b. Was the plan implemented? YES NO

c. (Describe the incident)

E. <u>Subpart E - Manifest System, Recordkeeping, and Reporting 40 CFR 265.70</u>

1. Manifest System

a. Upon receipt of a manifested hazardous waste shipment, does the TSD facility: N/A

(1) Sign and date each copy of manifest receipt of certifying waste? YES NO

(2) Note any discrepancies on each copy? YES NO

(3) Give delivering transporter one signed and dated copy of the manifest? YES NO

(4) Send a S/D copy of the manifest to the generator within 30 days after delivery and? YES NO

(5) Retain a copy of each manifest at the facility for 3 years from delivery? YES NO

b. If the TSD facility initiates a hazardous waste shipment, does it comply with generator requirements in Part 262? YES NO

c. Does the TSD facility examine manifests and wastes received to detect any significant discrepancies in quantity or type of waste, such as: YES NO

N/A

(1) Bulk waste-quantity variation of 10 percent or greater

(2) Batch waste - any variation in piece count

(3) Waste type - obvious differences discernible by inspection or waste analysis

d. If significant discrepancies are found, does the TSD facility:

(1) Reconcile discrepancies with generator or transporter within 15 days? or YES NO

(2) Immediately submit to EPA-RA a Discrepancy Report describing the discrepancy and attempts to resolve it and a copy of the manifest involved? YES NO

e. TSD facilities must keep a written operating record documenting the following details:

(1) Waste description and quantity received

(2) Methods and dates of its treatment, storage, and disposal

(3) The location and quantity of each HW at the facility

2. Operating Record

a. Does the owner/operator of the facility maintain an operating record at the facility (40 CFR 265.73)? YES NO

b. Does the record contain the following information.

(1) A description of, and the quantity of each HW received, and the method(s) and date(s) of its treatment, storage, or disposal at the facility? YES NO

(2) The location of each Hazardous Waste within the facility, and its quantity? YES NO

(3) A map showing disposal sites? YES NO N/A

(4) Summary reports and details of all incidents that require implementing the Contingency Plan? YES NO N/A

(5) Records and results of inspections as required (need only be kept three years)? YES NO

(6) All closure and post-closure cost estimates required for the facility? YES NO

(7) The results of testing and waste analysis? YES NO

3. **Facility Reporting Procedures**

a. Has the owner/operator prepared and submitted a single copy of the Annual Report to EPA by March 1 of each year? YES NO

b. Is owner/operator familiar with procedures for emergencies? YES NO

c. If a TSD facility accepts a regulated hazardous waste shipment without the required manifest or shipping paper, does it file an "Unmanifested Waste Report" within 15 days or receipt? YES NO N/A

F. Subpart F - Ground-Water Monitoring (40 CFR 265.90)

1. Are ground-water (GW) monitoring regulations required at this facility? YES NO

2. If YES, what is the relevant process unit?

   a. Surface impoundment (✓)
   b. Waste pile ( )
   b. Land treatment ( )
   c. Landfills ( )
   d. Other ( )
   Describe:

3. Has the owner/operator implemented a ground water monitoring plan? YES NO

4. If NO, has the facility implemented one of the following:

   a. GW Waiver [265.90(c)] ( )
   b. Alternate GW Monitoring System [265.90(d)] ( )
   c. Neutralization Waiver (265.90(e)] ( )
   d. Describe:

5. Does the ground water monitoring program consist of the following:

   a. At least 1 upgradient and 3 downgradient wells? YES NO
   b. GW Sampling and Analysis Plan YES NO
   c. GW sampling quarterly first year YES NO
   d. GW sampling semiannually after that YES NO
   e. Drinking Water Standards parameters YES NO
      Sampling frequency_____
   f. GW Quality parameters YES NO
      Sampling frequency_____
   g. GW Indicator parameters YES NO
      Sampling frequency_____
   h. GW elevation parameters YES NO
   i. Outline GW Quality Assessment Program YES NO
   j. Statistical Analysis of Indicator parameters YES NO

      Results:

Did not inspect

6. Has the facility implemented GW Quality Assessment program. YES NO

a. Date: _____

b. Results:

7. Does the facility maintain the necessary records.

a. Initial background parameter concentrations YES NO

b. Subsequent parameters concentrations YES NO

c. Statistical evaluations YES NO

did not inspect

8. Has the facility reported necessary information YES NO

a. DW Standards for 1st year YES NO

b. GW Indicator parameters annually YES NO

c. Statistical evaluation YES NO

9. Comments:

6. Subpart G - Closure and Post-Closure (40 CFR 265.110)

Closure

1. - Has the facility developed a closure plan which outlines all necessary steps to safely close the facility? (40 CFR 265.117) Did not inspect - was to be submitted to EPA at a later date.

   a. Description of how and when the facility will be partially closed (if applicable) and finally closed? YES NO

   b. Estimate of the maximum inventory of wastes in storage and in treatment at any time during the life of the facility? YES NO

   c. Description of the steps needed to decontaminate the facility equipment during closure? YES NO

   d. Comment:

Post-Closure

2. Has the facility developed a post-closure plan which contains the following steps to safely care for the facility after closure/post-close of the facility? (40 CFR 265.117) No, but may be subject to post-closure.

   a. Description of how post closure will be carried out for the next 30 years. ( ) ( )

   b. Notice to the local land authority within 90 days after closure is completed? ( ) ( )

   c. Notice in deed to property? ( ) ( )

H. Subpart H - Financial Requirements 40 CFR 265.140

1. Liability Did not inspect

- a. (1) Does facility maintain liability insurance for sudden occurrences in the amount of at least $1 million per occurrence with an annual aggregate of at least $2 million? YES NO

(2) By what method did the owner/operator demonstrate sudden liability coverages to the RA?

(a) If HW facility liability endorsement(s) ( )

(b) If HW facility certificate(s) of liability insurance ( )

(c) financial test ( )

(d) corporate guarantee ( )

(e) multiple mechanisms (specify) ( )

2. If a surface impoundment, landfill, or land treatment exist at the facility,

b. (1) does facility maintained liability insurance for nonsudden occurrence in the amount of at least $3 million per occurrence with an annual aggregate of at least $6 million? YES NO

(2) By what method did the owner/operator demonstrate non-sudden liability coverage to RA?

(a) HW facility liability endorsement(s)' ( )

(b) HW facility certificate(s) of liability insurance' ( )

(c) financial test ( )

(d) corporate guarantee ( )

(e) multiple mehcanisms (specify) ( )

c. Has owner/operator submitted an originally signed duplicate of liability coverage demonstration to RA?

d. Is wording of liability coverage instruments identical to that specified in 40 CFR 264.51?

YES NO

Comment:

2. Assurance

a. Closure

(1) Has facility prepared a written estimate of the cost of closing the facility in accordance with the closure plan (40 CFR 265.112)? Yes NO

(2) Is this cost estimate adjusted annually for inflation? YES NO

(3) Has facility established financial assurance for the closure of the facility (40 CFR 265.143)? YES NO

(4) By what method has this been achieved:

(a) Trust fund ( )
(b) Surety bond (with standby trust) ( )
(c) Letter of credit (with standby trust) ( )
(d) Insurance ( )
(e) Financial test ( )
(f) Corporate guarantee ( )
(f) Multiple mechanisms ( )

(5) Has facility submitted an originally duplicate of financial assurance to RA? YES NO

(6) Is wording of the financial assurance statement identical to that specified in 40 CFR 264.151 YES NO

(7) Comment:

b. Post-Closure (Disposal Facilities)

(1) Has facility prepared a written estimate of the cost of post-closure monitoring and maintenance of the facility (40 CFR 265.144)? YES NO

(2) Is this cost estimate inflation adjusted annually YES NO

(3) Has owner/operator established financial assurance for the post-closure care of the facility (40 CFR 265.145)? YES NO

(4) By what method has this been achieved:

(a) Trust fund ( )
(b) Surety bond (with standby trust) ( )
(c) Letter of credit (with standby trust ( )
(d) Insurance ( )
(e) Financial test ( )
(f) Corporate guarantee ( )
(g) Multiple Mechanisms ( )

8. Has owner/operator submitted an originally signed duplicate of financial assurance to Regional Administrator? YES NO

9. Is wording of the financial assurance statement identical to that specified in 40 CFR 264.151? YES NO

I. Subpart I Use and Management of Containers (40 CFR 265.170)

1. Does this section apply to this facility? YES NO

2. Are the containers made of or lined with materials which will not react with and are compatible with the hazardous waste to be stored in them? YES NO

3. Are the containers always closed, except to add or remove waste? YES NO

4. Are container storage areas inspected weekly for leaks and container deterioration (40 CFR 265.174)? YES NO

5. Are precautions taken to prevent accidental ignition or reaction of ignitable or reactive waste? YES NO

6. Are containers holding ignitable or reactive waste located at least 50 feet from the facility's property line? YES NO

7. Is the facility aware of and complying with the following requirements for incompatible wastes:

   a. Incompatible wastes must not be placed in the same containers, unless in compliance with 265.17(b) YES NO

   b. HW must not be placed in an unwashed container that previously held an incompatible waste YES NO

   c. Are storage containers holding HW that are incompatible with any waste or other material stored nearby separated from or protected from them by means of a dike, berm, wall, or other device? YES NO

   Explain?

8. Are containers marked or labeled in a manner equivalent to 40 CFR 172 subpart E? YES NO

9. Comments:

J. Subpart J - Tanks (40 CFR 265.190) — N/A — do not have tanks.

1. Does this section apply to this facility? YES NO

2. - Do tanks on the facility hold hazardous waste? YES NO

   If so, what are their contents?

   _____

   _____

3. Is storage in tanks conducted such that:

   a. It does not generated heat, pressure, fire, explosion or violent reaction? (If no, explain) YES NO

   b. It does not produce uncontrolled toxic mists, fumes, dusts, or gases? (If no, explain) YES NO

   c. It does not produce uncontrolled flammable fumes or gases? YES NO

   d. It does not damage the tank? YES NO

   e. It does not threaten the environment in other ways (i.e., leaks, spills)? YES NO

   Comments:

4. Is 2 feet of freeboard maintained in uncovered tanks? YES NO

   If no, is secondary containment used? YES NO

   (Explain)

5. Is the tank(s) continuously fed? YES NO

   If yes, is there a means to stop inflow? YES NO

   Explain

6. Are Hazardous Waste storage tanks operated in a manner which minimizes the possibility of overfilling? YES NO

   How:

   Waste feed cut-off ( )
   Bypass system to another tank ( )
   High level alarm ( )
   Other_____

7. Are inspections of the following conducted:

   a. Discharge control equipment? YES NO
      How often?

   b. Waste feed cut-off systems? YES NO
      How often?

   c. Data from tank monitoring equipment? YES NO
      How often

   d. The level of waste in the tank? YES NO
      How often?

   e. The structural integrity of tank? YES NO
      How often?
      How are inspections conducted?
      What is observed (looked for)?

   f. The immediate area around the tank for signs of leaks and the integrity of secondary containment (if any)? YES NO

8. Have any tanks once used for storage of hazardous waste been closed or their function changed? When?

   a. Were all hazardous wastes and/or residues removed? YES NO

   b. What was the disposition of the wastes or residues (i.e., where did it go)? YES NO

   c. When shipped?

9. Are ignitable or reactive wastes placed in tanks? YES NO

10. If yes, what measures are used to prevent ingnition or reaction?

11. Have wastes been placed in a tank which previously contained potentially incompatible waste or residue? YES NO

12. If reactive or ignitable wastes are stored in covered tanks, are they in compliance with the National Fire Protection Association's buffer zone requirements? YES NO

13. Are "No Smoking" signs posted? YES NO

14. Have others measures been adopted to reduce hazards associated with storage of ignitable or reactive waste in tanks? YES NO

- Explain

15. Waste Analysis and Trial Tests

Before treating and storing of hazardous waste in a tank is a detailed chemical and physical analysis of the waste obtained? YES NO

16. Does the company have and follow a written waste analysis plan? YES NO

a. Does the plan identify parameters used? YES NO

Explain

b. Sampling Method? YES NO

Explain

c. How frequent is analysis repeated? YES NO

d. Are results of waste analysis and trial tests placed in the facility's operating record.

17. Are waste analyses done when a tank is used to treat or store a HW which is substantially different or treated differently from waste previously treated or stored in the tank? YES NO

K. Subpart K - Surface Impoundments (40 CFR 265.220)

1. Does this section apply to this facility? YES NO

2. Does the surface impoundment maintain enough freeboard to prevent any overtopping of the dike by overfilling, wave action, or a storm? YES NO

3. Are the surface impoundments designed and operated to allow two feet of freeboard? YES NO

4. Do earthen dikes have a protective cover which minimizes erosion (grass, rock, shale)? YES NO

covered with snow at time of inspection

5. Is a waste analysis or trial test conducted whenever a surface impoundment is used to chemically treat a HW which is substantially different or treated differently from waste previously treated in the surface impoundment? N/A YES NO

6. Are results of waste analyses documented in the facility's operating record? YES NO

7. Are the surface impoundments inspected on a routine basis? How often? YES NO

8. Are ignitable or reactive wastes held in a surface impoundment (40 CFR 265.229)? ? YES NO

9. Comments: presently testing for constituents

The following 40 CFR Subparts do not have a specific checklist prepared because few of these types of facilities exists in Region X. Inspection made at facilities which operate any of the following would require the inspector to prepare an inspection checklist prior to the site visit.

L. Subpart L - Waste Piles (40 CFR 265.250)
M. Subpart M - Land Treatment (40 CFR 265.270)
N. Subpart N - Landfills (40 CFR 265.300)
O. Subpart O - Incinerators (40 CFR 265.340)
P. Subpart P - Thermal Treatment (40 CFR 265.370)
Q. Subpart Q - Chemical, Physical, and Biological Treatment (40 CFR 265.400)
R. Subpart R - Underground Injection (40 CFR 265.430)

Inspector: _____
Address: _____
_____
Telephone No: _____

DRAFT
RCRA LAND RESTRICTION F-SOLVENT
GENERATOR CHECKLIST

I. HANDLER IDENTIFICATION

Marco Alaska Petroleum Inc.
A. Handler Name B. Street (or other identifier)

C. City D. State E. Zip Code F. County Name

G. Nature of Business; Identification of Operations

H. EPA ID #

I. Handler Contact (Name and Phone Number)

II. GENERATOR COMPLIANCE

A. F-Solvent Identification

1. Does the handler generate the following wastes?

a. F001 ___Yes ___No

b. F002 ✓ Yes ___No → they did this past year

c. F003 ___Yes ___No

If an F003 wastestream listed solely for ignitability has been mixed with a non-restricted solid or hazardous waste, does the resultant mixture exhibit the ignitability characteristic? ___Yes ___No

d. F004 ___Yes ___No

e. F005 ___Yes ___No

2. Source of the above: Form 8700-12 ___; Part A ___; Part B ___; other (specify) ___

Appendix A is intended to assist the inspector and enforcement official in determining whether the facility is generating F-solvent wastes, if such wastes were not identified by the facility previously. If you are concerned that F-solvent wastes may be misclassified or mislabeled, turn to Appendix A. Note concerns below: _____

Handler Name: _____
ID Number: _____
Inspector: _____
Date: _____

B. BDAT Treatability Group - Treatment Standards Identification — Comments

1. Did the generator correctly determine the appropriate treatability group [268.41] of the waste (Wastewaters containing solvents, pharmaceutical wastewaters containing spent methylene chloride, all other spent solvent wastes)?

___Yes ___No

C. Waste Analysis

1. Did the generator determine whether the waste exceeds treatment standards based on [268.7(a)]:

a. Knowledge of wastes ✓Yes ___No

b. TCLP ___Yes ___No

c. Other (specify)_____

If knowledge, note how this is adequate:
listed waste

If determined by TCLP, provide date of last test, frequency of testing, and attach test results.

Dates/frequency:_____

Note any problems:_____

d. Were wastes tested using TCLP when a process or wastestream changed?

___Yes ___No

2. Did the F-solvent wastes exceed applicable treatability group treatment standards upon generation [268.7(a)(2)]? ✓Yes ___No ___Some

3. Did the generator dilute the waste or the treatment residual so as to substitute for adequate treatment [268.3]? ___Yes ✓No

D. Management

1. Onsite management

a. Were F-solvent wastes managed onsite?

✓Yes ___No

If yes, answer 1(b) and (c); if no, answer 2.

Handler Name: _____
ID Number: _____
Inspector: _____
Date: _____

Comments

b. For wastes that exceed treatment standards, was treatment, storage, and/or disposal conducted?
___Yes ✓No

If yes, TSDF Checklist must be completed.

c. Are test results maintained in the operating record [264.74(b)3/265.73(b)(3)]?
___Yes ___No

2. Offsite Management

a. If F-solvent wastes exceed treatment standards, did generator provide treatment facility [268.7(a)(1)]:

(i) EPA waste number? ___Yes ✓No

(ii) Applicable treatment standard? ___Yes ✓No

(iii) Manifest number? ✓Yes ___No

(iv) Waste analysis data, if available? N/A
___Yes ___No

For the F050 waste, but not the F002.

Identify offsite treatment facilities _____

b. If F-solvent wastes did not exceed treatment standards, did generator provide the disposal facility [268.7(a)(2)]: N/A

(i) EPA Hazardous waste number? ___Yes ___No

(ii) Applicable treatment standard? ___Yes ___No

(iii) Manifest number? ___Yes ___No

(iv) Waste analysis data, if available?
___Yes ___No

(v) Certification that waste meets treatment standards? ___Yes ___No

Identify land disposal facilities receiving the BDAT certified wastes _____

Handler Name: _____
ID Number: _____
Inspector: _____
Date: _____

Comments

c. If waste is subject to nationwide variance [268.30] (e.g., solvent-water mixtures less than 1%), case-by-case extension [268.5] or petition [268.6] does generator provide notice to disposer that waste is exempt from land disposal restrictions [268.7(a)(3)]? N/A

___Yes ___No

E. Storage of F-Solvent Waste

1. Was F-solvent waste stored for greater than 90 days (after variance 180/270 days for SQG) [268.50(a)(1)]?

___Yes ✓No

If yes, was facility operating as a TSD under interim status or final permit? ___Yes ✓No

If yes, TSDF Checklist must be completed.

F. Treatment Using RCRA 264/265 Exempt Units or Processes (i.e., boilers, furnaces, distillation units, wastewater treatment tanks, etc.)

1. Were treatment residuals generated from RCRA 264/265 exempt units or processes? N/A

___Yes ___No

If yes, list type of treatment unit and processes

_____
_____
_____

If the residuals from a RCRA-exempt treatment unit are above the treatment standards, the owner/operator is considered a generator of restricted waste. The inspector should determine whether the generator requirements, particularly waste identification requirements, have been met for the treatment residuals.

(907) 452-1714

Northern Regional Office
1001 Noble Street
Suite 350
Fairbanks, Alaska 99701

May 1, 1989

Mr. Gerald E. Fritz, General Manager
MAPCO Alaska Petroleum Inc.
1100 H & H Lane
North Pole, Alaska 99705

Dear Mr. Fritz:

This is a follow-up to the RCRA inspection performed at your facility on March 21, 1989, to determine compliance with state and federal regulations pertaining to the management of hazardous waste, 18 AAC 62 and 40 CFR 262.

The portion of your facility inspected was found to be in compliance with the state and federal hazardous waste regulations. The state does not plan to take any further action as a result of this inspection.

I would like to remind you of a couple of things that came out during this inspection related to the management of hazardous waste at your facility. First, the revised inspection logs that were provided to the inspectors during the inspection should now be in use for inspection at the Boneyard Waste Storage Area, Hazardous Waste Drum Storage Area, Tank 192, Sumps 901, 905, 909-B and 05-7, and Lagoon B. Secondly, I wanted to remind you of the need to provide all the information on your manifests that would apply to the 40 CFR 268 regulations concerning land disposal restriction notification including the treatment standards for the restricted wastes.

Your cooperation with this inspection effort is appreciated. If you should have any questions, please contact Mr. Rich Cormack of my staff at (907)452-1714.

Sincerely,

DRAFT

William D. McGee
Regional Environmental Supervisor

cc: David DiTraglia, DEC
Chuck Shenk, EPA Region 10
Steve Torok, EPA AOO