

# Public Review of Hazardous Waste Storage Permit

## FACT SHEET

### BP Exploration Alaska Inc. - Prudhoe Bay facility

Photo © M. Cole Greve 2006



U.S. Environmental Protection Agency, Region 10

July 2009

## Public Comment Period July 30 to September 14, 2009

EPA is proposing to issue a Hazardous Waste Storage Standardized Permit for the BP Exploration Alaska (BPXA) Prudhoe Bay facility on the North Slope of Alaska.

Send written comments on the draft permit by **September 14, 2009**. Comments should include all references, facts and supporting material. Download the draft permit from EPA's website:

[yosemite.epa.gov/R10/OWCM.NSF/permits/PrudhoeRCRA/](http://yosemite.epa.gov/R10/OWCM.NSF/permits/PrudhoeRCRA/) or view the draft permit Monday through Friday from 10:00 a.m. - 4:00 p.m. at these EPA offices:

U.S. EPA  
Alaska Operations Office  
Federal Building, Room 537  
222 W. 7th Avenue  
Anchorage, Alaska 95513

U.S. EPA Region 10  
10th Floor Library  
1200 Sixth Avenue  
Seattle, Washington 98101

## Permit details

In July 2009, BPXA submitted an application for the newly available RCRA Standardized Permit for hazardous waste storage. The Standardized Permit is a relatively new type of RCRA permit. The regulations allowing this type of permit were finalized in 2005. Under the regulations governing standardized permits, EPA must approve or reject the application within 120 days.

The proposed permit is to allow BPXA to store hazardous waste in containers at their Prudhoe Bay facility. This action will result in minimal changes to the ongoing hazardous waste activities at BPXA's storage facility.

Permit conditions under the RCRA Standardized Permit rule are very similar to the "interim status" regulations under which

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## Possible Public Hearing

EPA will hold a public hearing if we receive significant written notices of opposition to the draft permit and sufficient requests for a public hearing.

EPA will not hold a public hearing if we do not receive sufficient requests by August 12, 2009. If you did not request a hearing, but want to find out if a hearing will take place, please call Robbie Hedeem at 1-800-424-4372, extension 0201.

To request a public hearing, send a written request by August 12, 2009, to the following address:

**Robbie Hedeem**

U.S. EPA Region 10  
1200 Sixth Avenue, Suite 900, AWT-121  
Seattle, Washington 98101

*Email: [hedeem.roberta@epa.gov](mailto:hedeem.roberta@epa.gov)*

# Site and facility description

The Prudhoe Bay facility is an on-shore oil and gas field on the North Slope of Alaska that is currently being used for development and production of oil and gas. The facility operates under long-term leases from the State of Alaska, which owns the majority of the surface land. Oil and gas field operations are co-owned by five energy companies, including ConocoPhillips Alaska, Inc., ExxonMobil Production Co., and BP Exploration.

Prudhoe Bay Operations include oil and gas production wells, water and gas injection wells, central power station, seawater treatment and injection plants, and support facilities such as an airport, various associated roads; oil and gas pipelines; and electrical power transmission lines.

The facility is approximately 388 square miles in area.

The facility is regulated as a hazardous waste facility under RCRA. BPXA generates and stores wastes related to oil and gas production. These wastes include large but varying volumes of crude oil, diesel fuel, natural gas liquids, methanol, spent acids, biocides, and hydraulic fluids. Support operations also generate wastes at the facility including laboratory operations, vehicle and facility maintenance.

Some of these wastes are placed in 55-gallon drums and stored at the Hazardous Waste Storage Unit prior to shipping offsite. This storage unit is located on the Base Operations Camp pad in the

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## RCRA Corrective Action

The draft permit for BPXA Prudhoe Bay includes site-specific conditions that include clean up (or corrective action) requirements for releases of hazardous waste under the Resource Conservation and Recovery Act (RCRA).

In 2007, BPXA signed a RCRA Corrective Action Administrative Order on Consent for the BPXA Prudhoe Bay facility. The corrective action requirements in the permit will be the same requirements as those in the 2007 Order, which will be incorporated by reference into the permit.

There are thousands of areas at the Prudhoe Bay facility that have been or may have been contaminated by site operations throughout the past 30 years. These areas are called Solid Waste Management Units or SWMUs and are grouped into ten categories, such as reserve pits, oily waste cells, exploration sites, and old landfills. Under the Order, BP is required to investigate and clean up the sites. Some types of SWMUs (well cellars and

flare pits, for example) will not be cleaned up until the active life of the oil field has ended.

The public will have an opportunity to comment on the selected cleanup remedies for the SWMUs when EPA issues a Statement of Basis for the proposed remedy.

### *Permit Details*

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BPXA currently operates. Changes to current facility operations resulting from issuance of the permit will be:

- 1) BPXA will no longer be able to accept waste from off site, and
- 2) To minimize the potential for releases to the environment, the permit will require secondary containment during loading and unloading of hazardous waste at the storage unit. (BPXA currently does this voluntarily, but it is not required under “interim status” regulations.)

# Site and facility description

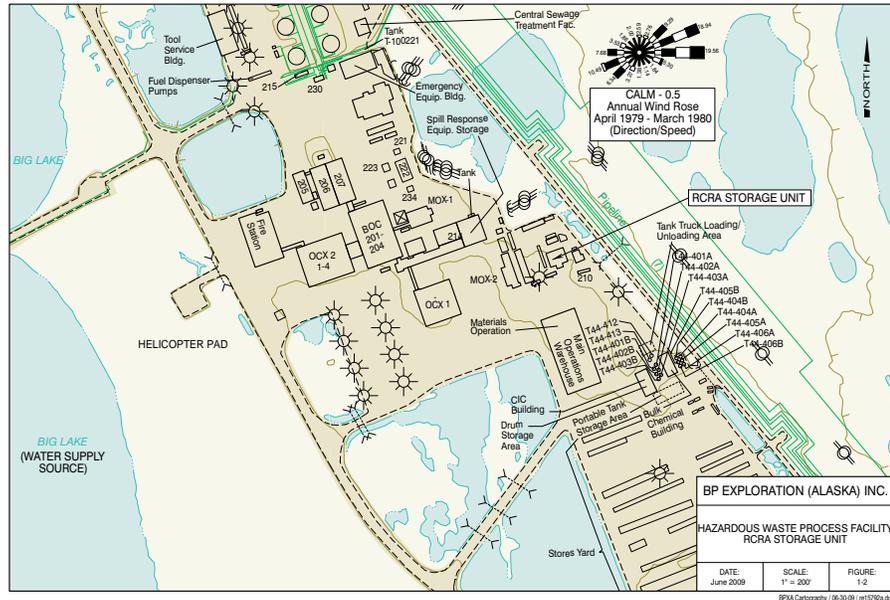
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Western Operating Area of Prudhoe Bay. Under RCRA, facilities that store hazardous waste for more than 30 days must have a RCRA storage permit.

BPXA applied for a RCRA hazardous waste storage permit in 1980 and was subsequently authorized to store hazardous wastes under "interim status" regulations. Interim status regulations

apply to those facilities that have applied for, but have not yet received (through no fault of their own), a permit.

Releases and potential releases of hazardous wastes at the Prudhoe Bay facility are documented by site reports. Environmental samples collected by BPXA have detected contaminants in the surface soils and gravels, in the suprapermafrost groundwater and the surface water at some areas of the site.



Detected contaminants include: benzene, toluene, trichloroethylene, acetone, methylene chloride, chromium, lead, and mercury.

Several of these contaminants have been detected at levels which exceed the federal and/or Alaska standards to protect human health and the environment.

BPXA is investigating and cleaning up several sites to minimize or remove the risk posed by the released contaminants.

## *EPA is interested in your questions or concerns*

If you have questions or comments about the BPXA facility, please contact Robbie Hedeem by telephone or e-mail.

EPA and BPXA will inform all interested parties about ongoing and upcoming activities and seek public input throughout this process. If you are interested in receiving information about activities at BPXA's Prudhoe Bay facility, please provide your name, title, company, and

mailing address by mail, telephone, or email to Robbie Hedeem.

*For those with impaired hearing or speech, please contact EPA's telecommunications device for the hearing impaired (TDD) at (206) 553-1698. To ensure effective communication with everyone, additional services can be made available to persons with disabilities by contacting one of these EPA phone numbers.*



U. S. Environmental Protection Agency  
1200 Sixth Avenue, ETPA-081  
Seattle, Washington 98101-1128

Pre-Sorted Standard  
Postage and Fees Paid  
U.S. EPA  
Permit No. G-35  
Seattle, WA

*BP Exploration Alaska Inc. - Prudhoe Bay facility  
Prudhoe Bay, Alaska  
July 2009*

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## For More Information

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EPA Community Involvement Coordinator  
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***If you need materials in an alternative format, please contact Suzanne Skadowski, TTY users please call the Federal Relay Service: 800-877-8339***

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