



ARKANSAS
Department of Environmental Quality

May 2, 2013

Sam McFadin
M & M Environmental Oil Field Services
389 Hwy 65 South
Conway, AR 72032

RE: FACILITY: M & M Environmental Oil Field Services
AFIN: 71-00318

PERMIT: ARR001075
COUNTY: Van Buren

Mr. McFadin:

On March 12, 2013 I performed a compliance assistance inspection of the Industrial Stormwater Permit (IGP) for the above washout and waste storage facility in accordance with the provisions of the Arkansas Water and Air Pollution Control Act, and the regulations promulgated thereunder.

The purpose of this inspection was to acclimate your industry with the requirements of your new IGP. No violations were recorded during the inspection for enforcement action, but **the violations that were observed** have been explained in the attached Inspection Legend Form. This form is used for each IGP inspection and the violations have been listed for your review and preparation for an unannounced follow-up inspection of your ARR001075 permit. In addition, please be advised of the following:

- 1) A modification to the No Discharge Permit 4984-WR-3 is currently in process to cover the unpermitted Solidifying Station, the gravel storage, and the washout being constructed; however, a modification request must also be issued for coverage under the NPDES program as these are two separate permits with separate requirements:
 - a) the 4984-WR-3 is a state No Discharge permit issued by ADEQ and
 - b) the ARR001075 is a federal Industrial Stormwater permit required by EPA and enforced by ADEQ.**Due to the new industrial activities being conducted onsite (specifically the Solidifying Station and Gravel Washout), a modification is required for this permit. Please contact Mr. Jamal Solaimanian at 501-682-0620 or via email at jamal@adeq.state.ar.us for further instructions regarding the permit modification.**

- 2) **Also, please be advised that due to the current construction activity for the above modifications, the above-mentioned facility may require a Construction Stormwater Permit issued through ADEQ's Water Division Permits Branch. Please also provide a summary of the construction activity occurring at the site to Mr. Jamal Solaimanian at 501-682-0620 or via email at jamal@adeq.state.ar.us.**

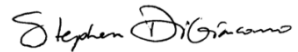
Mr. Solaimanian is an excellent resource and can help you get in compliance with the permit. You can also find additional information pertaining to NPDES Industrial and Construction Stormwater Permit requirements and modifications at the following website.

http://www.adeq.state.ar.us/water/branch_permits/general_permits/stormwater/industrial/industrial.htm

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If I can be of any further assistance, feel free to contact me at 479-968-7339 x17 or via email at digiaco@adeq.state.ar.us

Sincerely,



Stephen DiGiacomo
Oil & Gas Field Inspector
Water Division
(479) 968-7339 x17
digiaco@adeq.state.ar.us

cc: Water Division Permits Branch
Jamal Solaimanian, General Permit Section Supervisor, jamal@adeq.state.ar.us



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Washington, D.C. 20460

Form Approved
OMB No. 2040-0003

NPDES Compliance Inspection Report

Section A: National Data System Coding

Transaction Code	NPDES	Yr/Mo/Day	Inspec. Type	Inspector	Fac. Type
1 N 2 5 3 A R R 0 0 1 0 7 5 11 12 1 3 0 3 2 8 17 18 H 19 S 20 2					
Remarks					
V A N B U R E N C O U N T Y					
Inspection Work Days	Facility Evaluation Rating	BI	QA	Reserved	
67 0 . 5 69	70 N	71 N	72 N	73	74 75

Section B: Facility Data

Name and Location of Facility Inspected (<i>For industrial users discharging to POTW, also include POTW name and NPDES permit number</i>) M & M Environmental Oil Field Services 15110 Hwy 65 South, Damascus, AR 72039	Entry Time/Date 11:45 am 3/12/2013	Permit Effective Date 11/8/2012
	Exit Time/Date 01:45 pm 3/12/2013	Permit Expiration Date 6/30/2014
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) Sam McFadin (Owner/Operator) O: (501) 472-8869 F: (888) 774-3834	Other Facility Data	
Name, Address of Responsible Official/Title/Phone and Fax Number Sam McFadin (Owner/Operator) 15110 Hwy 65 South, Damascus, AR 72039 O: (501) 472-8869 F: (888) 774-3834	Contacted Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	

Section C: Areas Evaluated During Inspection

(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)

N	Permit	N	Flow Measurement	N	Operations & Maintenance	N	Sampling
N	Records/Reports	N	Self-Monitoring Program	N	Sludge Handling/Disposal	N	Pollution Prevention
N	Facility Site Review	N	Compliance Schedules	N	Pretreatment	N	Multimedia
N	Effluent/Receiving Waters	N	Laboratory	N	Storm Water	N	Other:

Section D: Summary of Findings/Comments (Attach additional sheets if necessary)

This was a compliance assistance inspection - no formal evaluations were conducted for this facility.

Name(s) and Signature(s) of Inspector(s) Stephen DiGiacomo <i>Stephen DiGiacomo</i>	Agency/Office/Telephone/Fax Arkansas Department of Environmental Quality Russellville Office / (479) 968-7339 x17 / (479) 968-7321	Date March 28, 2013
Signature of Reviewer Kerri McCabe <i>Kerri McCabe</i>	Agency/Office/Phone and Fax Numbers ADEQ / NLR / 501-682-0642	Date April 1, 2013

Inspection Legend Form

S = Satisfactory, M = Marginal, U = Unsatisfactory, Y = Yes, N = No, NI = Not Implemented, NA = Not Applicable,
NE = Not Evaluated

If Y and a NI are checked, it means it is in the SWPPP but not implemented in the field – which is a violation.

SECTION A: PERMIT VERIFICATION	
PERMIT SATISFACTORILY ADDRESSES OBSERVATIONS	<input type="checkbox"/> S <input type="checkbox"/> M <input checked="" type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
A. CORRECT NAME AND MAILING ADDRESS OF PERMITTEE:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
B. NOTIFICATION GIVEN TO EPA/STATE OF NEW, DIFFERENT OR INCREASED DISCHARGES:	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
C. NUMBER AND LOCATION OF DISCHARGE POINTS AS DESCRIBED IN PERMIT:	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
D. ALL DISCHARGES ARE PERMITTED:	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
Comments:	
<p><i>Due to the modifications made to the site after the permit was issued, for which proper notification was not given to EPA or the State, additional discharge points may be present at the facility. An evaluation of the site should be conducted to identify potential outfalls in regards to the additional industrial activity – specifically at the west side of the facility where the storage for contaminated gravel from Oil and Gas activities is being constructed. These outfalls must be listed under Similar Outfalls in the NOI for evaluation by ADEQ personnel. Furthermore, the 2x12 wooden gate used to divert stormwater from the pit into Outfall #2, which is installed in the flume that transports wastewater from the washout bay to the pit, is not a permitted stormwater discharge per condition 1.9.1 of the permit. Mr. McFadin said that the gate would be removed and a wall would be constructed to prevent unpermitted discharges from this point.</i></p>	
SECTION B: STORM WATER POLLUTION PREVENTION PLAN EVALUATION	
PERMITTEE SWPPP MEETS PERMIT REQUIRMENTS	<input type="checkbox"/> S <input type="checkbox"/> M <input checked="" type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
1. Is the SWPPP available for review by ADEQ? (Part 4.2)	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NI <input type="checkbox"/> NA <input type="checkbox"/> NE
2. Does the SWPPP contain facility name, general permit tracking number, facility physical address, and SIC and NAICS codes? (Part 4.6.1) – contains the wrong general permit tracking number	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NI <input type="checkbox"/> NA <input type="checkbox"/> NE
3. Pollution Prevention Team	
A) Does the SWPPP identify specific individuals or positions? (Part 4.6.2)	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NI <input type="checkbox"/> NA <input type="checkbox"/> NE
B) Does the SWPPP outline the responsibilities of each member of the Pollution Prevention Team? (Part 4.6.2) - Pollution Prevention Team needs to be updated to reflect additional members	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NI <input type="checkbox"/> NA <input type="checkbox"/> NE
4. Does the SWPPP contain a facility description (process diagram, general layout, storage of raw materials, the flow of goods and materials through the facility and seasonal variations)? (Part 4.6.3) – the narrative on the SWPPP does not describe all the current industrial activity at the site and is insufficient for obtaining an understanding the flow of goods and materials or seasonal variations at the facility	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NI <input type="checkbox"/> NA <input type="checkbox"/> NE
5. Does the facility site map contain the following items?	
A) The size of the property in acres? (Part 4.6.4.a)	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NI <input type="checkbox"/> NA <input type="checkbox"/> NE
B) The location and extent of significant structures and impervious surfaces? (Part 4.6.4.b) – needs to be updated to reflect current industrial operations and submitted to ADEQ for review and approval	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NI <input type="checkbox"/> NA <input type="checkbox"/> NE
C) The direction of stormwater flow using arrows? (Part 4.6.4.c)	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NI <input type="checkbox"/> NA <input type="checkbox"/> NE
D) The locations of all existing structural control measures? (Part 4.6.4.d)	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NI <input type="checkbox"/> NA <input type="checkbox"/> NE
E) The locations of all receiving wastewaters in the immediate vicinity of the facility? (Part 4.6.4.e)	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NI <input type="checkbox"/> NA <input type="checkbox"/> NE
F) The locations of all stormwater conveyances including ditches, pipes, and swales? (Part 4.6.4.f)	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NI <input type="checkbox"/> NA <input type="checkbox"/> NE
G) The locations of potential pollutant sources? (Part 4.6.4.g) – modifications need to be added to the map; totes of chemicals used at the site for treating water must be marked on the map	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NI <input type="checkbox"/> NA <input type="checkbox"/> NE
H) The locations of all stormwater monitoring points? (Part 4.6.4.h)	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NI <input type="checkbox"/> NA <input type="checkbox"/> NE
I) The locations of stormwater inlets and outfalls with unique identification code for each outfall with indications if one or more outfall is being treated as “substantially identical” and an approximate outline of the areas draining to each outfall? (Part 4.6.4.i)	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NI <input type="checkbox"/> NA <input type="checkbox"/> NE
J) Where the stormwater discharges to municipal separate storm sewer system (MS4), if applicable? (Part 4.6.4.j)	<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NI <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
K) The locations and descriptions of all non-stormwater discharges identified in the SWPPP? (Part 4.6.4.k)	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NI <input type="checkbox"/> NA <input type="checkbox"/> NE
L) The locations of the following activities if they are exposed to precipitation? (Part 4.6.4.l) – the SWPPP map has not been updated to reflect all the below information	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NI <input type="checkbox"/> NA <input type="checkbox"/> NE
Fueling Stations	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NI <input type="checkbox"/> NA <input type="checkbox"/> NE
Vehicle and equipment maintenance and/or cleaning areas	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NI <input type="checkbox"/> NA <input type="checkbox"/> NE
Loading and unloading areas	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NI <input type="checkbox"/> NA <input type="checkbox"/> NE
Locations used for the treatment, storage, or disposal of waste	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NI <input type="checkbox"/> NA <input type="checkbox"/> NE
Liquid storage tanks	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NI <input type="checkbox"/> NA <input type="checkbox"/> NE

Processing and storage areas	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NI <input type="checkbox"/> NA <input type="checkbox"/> NE
Immediate access roads and rail lines used or traveled by carriers of raw materials, manufactured products, waste material, or by-products used or created by the facility	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NI <input type="checkbox"/> NA <input type="checkbox"/> NE
Transfer areas for substances in bulk	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NI <input type="checkbox"/> NA <input type="checkbox"/> NE
Machinery	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NI <input type="checkbox"/> NA <input type="checkbox"/> NE
M) The locations and sources of run-on to the site from adjacent property that contains significant quantities of pollutants? (Part 4.6.4.m)	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NI <input type="checkbox"/> NA <input type="checkbox"/> NE
6. A description of potential pollutant sources	
A) An inventory of industrial activities which have been or may potentially be sources of significant amounts of pollutants? (Part 4.6.5.1) – has not been updated to reflect modifications to the site, the gate installed in the flume that diverts encountered stormwater from the washout bay into Outfall #2 should be addressed	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NI <input type="checkbox"/> NA <input type="checkbox"/> NE
B) An inventory of all types of materials handled at the site that might potentially be exposed to precipitation? (Part 4.6.5.2) – has not been updated to reflect modifications to the site	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NI <input type="checkbox"/> NA <input type="checkbox"/> NE
C) A list of significant spills and significant leaks of toxic or hazardous pollutants that have occurred in areas exposed to precipitation or drained to a stormwater conveyance for three years prior to the effective date of the permit. (Part 4.6.5.3) – records have not been kept	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NI <input type="checkbox"/> NA <input type="checkbox"/> NE
D) A summary of existing discharge sampling data (Part 4.6.5.4) – records were unavailable	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NI <input type="checkbox"/> NA <input type="checkbox"/> NE
E) Risk Identification and Summary of Potential Pollutant Sources (Part 4.6.5.5) – has not been updated to reflect modifications to the site	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NI <input type="checkbox"/> NA <input type="checkbox"/> NE
7. Measures and Controls –SWPPP must describe how these are used.	
A) Best Management Practices (BMPs) (Part 4.6.6.1) – has not been updated to reflect modifications to the site	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NI <input type="checkbox"/> NA <input type="checkbox"/> NE
B) Exposure Minimization (Part 4.6.6.2) – has not been updated to reflect modifications to the site	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NI <input type="checkbox"/> NA <input type="checkbox"/> NE
C) Good Housekeeping (Part 4.6.6.3) – has not been updated to reflect modifications to the site, including secondary containment for onsite chemicals, control of mud bulking materials, contaminated gravel, etc.	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NI <input type="checkbox"/> NA <input type="checkbox"/> NE
D) Preventative Maintenance (Part 4.6.6.4) – has not been updated to reflect modifications to the site	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NI <input type="checkbox"/> NA <input type="checkbox"/> NE
E) Spill Prevention and Response Procedures (Part 4.6.6.5)	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NI <input type="checkbox"/> NA <input type="checkbox"/> NE
F) Employee Training Procedures (Part 4.6.6.6)	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NI <input type="checkbox"/> NA <input type="checkbox"/> NE
G) Erosion and Sediment Control (Part 4.6.6.7) – has not been updated to reflect modifications to the site	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NI <input type="checkbox"/> NA <input type="checkbox"/> NE
H) Management of Run-on and Runoff (Part 4.6.6.8)	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NI <input type="checkbox"/> NA <input type="checkbox"/> NE
I) Additional Requirements for Salt Storage (Part 4.6.6.9)	<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NI <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
8. Authorized Non-stormwater Discharges (Part 4.6.7) – list must be in SWPPP	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NI <input type="checkbox"/> NA <input type="checkbox"/> NE
9. Evaluations and Inspections (Part 4.6.10)	
A) Visual Site Inspections (minimum 4/year) (Part 4.6.10.1) – records have not been kept	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NI <input type="checkbox"/> NA <input type="checkbox"/> NE
At least one visual inspection conducted during a rain event	<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NI <input type="checkbox"/> NA <input type="checkbox"/> NE
Inspections recorded and include: date of inspection, person doing inspection; major observations, and corrective actions required.	<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NI <input type="checkbox"/> NA <input type="checkbox"/> NE
B) Comprehensive Site Compliance Evaluation (Annual) (Part 4.6.10.2) – records have not been kept	<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NI <input type="checkbox"/> NA <input type="checkbox"/> NE
Comments:	
<p>Due to the recent modifications, there were numerous violations in this section. While the initial SWPPP prepared by a consultant is useful, the SWPPP is a living document and should be continuously updated to reflect changing conditions – the goal is that site awareness in relation to stormwater and industrial runoff is improved for all employees at the facility. The SWPPP can be updated by hand if need be, and changes to the map can also be updated by hand. Again, the goal is to promote healthy industries by being good neighbors through site awareness and pollution prevention.</p> <p>Additionally, large modifications such as the Solidifying Station and the gravel washout must be added to the SWPPP and submitted to ADEQ Permits Division for review and approval. Additional permits may be required to cover the construction activity at the site.</p>	
SECTION C: MONITORING	
PERMITTEE MONITORING MEETS PERMIT REQUIRMENTS	<input type="checkbox"/> S <input type="checkbox"/> M <input checked="" type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
1. Is the facility one of the four Effluent Guideline Facilities in the Permit? (Cement MFG, Fertilizer MFG, Steam Electric coal pile, or Paving and Roofing Materials)(Part 3.1.1)	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NI <input type="checkbox"/> NA <input type="checkbox"/> NE
A) Are all outfalls from the regulated process being sampled? (Part 3.1.3)	<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NI <input type="checkbox"/> NA <input checked="" type="checkbox"/> NE
B) If coal pile run off is monitored, are all other stormwater flows excluded? (Part 3.1.1)	<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NI <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
2. Which of the monitoring categories is this facility subject to: (Part 3.3)	
A) Are samples being collected for each semi-annual monitoring period (Part 3.5)	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NI <input type="checkbox"/> NA <input type="checkbox"/> NE

B) Are samples being collected from the location specified in the NOI and SWPPP (Part 3.6)	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NI <input type="checkbox"/> NA <input type="checkbox"/> NE
C) Has the permittee determined that some of the outfalls are similar? (Part 3.7.1)	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NI <input type="checkbox"/> NA <input type="checkbox"/> NE
Are the conditions on the ground still the same as documented for the similar outfalls (Part 3.7.1)	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NI <input type="checkbox"/> NA <input type="checkbox"/> NE
D) Are all parameters for the monitoring category being sampled and analyzed? (Part 3.7.2)	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NI <input type="checkbox"/> NA <input type="checkbox"/> NE
E) Were the samples collected during a measureable storm event? (Part 3.7.2.b)	<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NI <input type="checkbox"/> NA <input checked="" type="checkbox"/> NE
F) Were the samples properly preserved and analyzed? (Part 3.7.2)	<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NI <input type="checkbox"/> NA <input checked="" type="checkbox"/> NE
G) Are the sample locations suitable for the collection of a representative sample? (Part 3.3)	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NI <input type="checkbox"/> NA <input type="checkbox"/> NE
3. Has any of the monitoring revealed an exceedance of the benchmark values for this facility?(Part 3.11.2)	<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NI <input type="checkbox"/> NA <input checked="" type="checkbox"/> NE
A) Has a process to develop a corrective action plan been started within 30 days of exceedances? (Part 3.11.2)	<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NI <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
B) If four monitoring periods have passed without an exceedance of a benchmark value, has the permittee requested a reduction in monitoring? (Part 3.11.1)	<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NI <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
Comments:	
<i>No monitoring data was onsite or online for evaluation.</i>	
SECTION D: RECORD KEEPING AND REPORTING	
PERMITTEE RECORD KEEPING AND REPORTING MEETS PERMIT REQUIRMENTS	<input type="checkbox"/> S <input type="checkbox"/> M <input checked="" type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
1. Have DMRs for the previous year of monitoring been submitted to ADEQ and is a copy in the file? (Part 3.12.3.a)	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NI <input type="checkbox"/> NA <input type="checkbox"/> NE
Are the DMRs properly completed?	<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NI <input type="checkbox"/> NA <input checked="" type="checkbox"/> NE
Does the permittee have copies of lab reports and chain of custody records?	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NI <input type="checkbox"/> NA <input type="checkbox"/> NE
Are the appropriate records of the measureable storm event and sampling being kept? (Part 3.7.2.e)	<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NI <input type="checkbox"/> NA <input checked="" type="checkbox"/> NE
2. Has a copy of the annual comprehensive evaluation been submitted to the agency and is a copy on file? (Part 3.12.3.b)	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NI <input type="checkbox"/> NA <input type="checkbox"/> NE
3. Is permittee keeping copies of inspections and corrective actions on file? (Part 4.6.10.1)	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NI <input type="checkbox"/> NA <input type="checkbox"/> NE
4. Are copies of training records being kept on file? (Part 4.6.6.6)	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NI <input type="checkbox"/> NA <input type="checkbox"/> NE
5. Is there a list of significant spills and leaks being maintained? (Part 4.6.5.3)	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NI <input type="checkbox"/> NA <input type="checkbox"/> NE
Comments:	
<i>The permit was issued in November of 2012 and Sam McFadin explained that samples had been taken for the 2012 July-December sampling period but that the lab had not delivered the results. The 2012 Annual Report and DMRs were not available onsite or online.</i>	
SECTION E: FACILITY TOUR	
PERMITTEE FACILITY TOUR MEETS PERMIT REQUIRMENTS	<input type="checkbox"/> S <input checked="" type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
1. Any evidence of spills or leaks that have not been properly cleaned up as required by the SWPPP?	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NI <input type="checkbox"/> NA <input type="checkbox"/> NE
2. Any evidence of erosion or un-stabilized ground?	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NI <input type="checkbox"/> NA <input type="checkbox"/> NE
3. Any controls, structures, or storage areas that are not as identified in the SWPPP?	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NI <input type="checkbox"/> NA <input type="checkbox"/> NE
4. Any non-stormwater discharges not identified in the SWPPP? (see Part 1.7 of permit for list of allowable non-stormwater discharges)	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NI <input type="checkbox"/> NA <input type="checkbox"/> NE
5. Any non-stormwater discharges that are not allowed under this permit? (see Part 1.7 of permit for list of allowable non-stormwater discharges)	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NI <input type="checkbox"/> NA <input type="checkbox"/> NE
6. Are BMPs being properly operated and maintained? (Part 6.1)	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NI <input type="checkbox"/> NA <input type="checkbox"/> NE
7. Are housekeeping procedures being implemented and are they sufficient?	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NI <input type="checkbox"/> NA <input type="checkbox"/> NE
Comments:	
<i>Housekeeping was exceptional, other than a few totes that were not in secondary containment, and there were no discharges, spills, or leaks observed from the facility during the inspection. The levee for the washout pit had no issues and the liner was in good condition with no holes observed. A 2X12 wooden gate was installed in the flume which transports wastewater from the washout bay to the pit. This gate diverts contaminated stormwater into Outfall #2, which is a discharge that is not covered by this permit per Permit Requirement 1.9.1. Other concerns noted onsite were that the operational Solidifying Station and the gravel washout under construction were not permitted. Some of the solids from the Solidifying Station had been tracked out of containment and onto the lot, however the drainage of this area is controlled directly into the washout bay; and therefore, through the flume and into the pit</i>	

**NPDES Compliance Inspection Report
Further Explanation**

Paperwork issues were addressed in the Inspection Legend Form, and also onsite extensively. Notes were taken by M&M personnel during the inspection as to the needed improvements.

A 2X12 wooden gate was installed in the flume, which transports wastewater from the washout bay to the pit. This gate diverts contaminated stormwater into Outfall #2, which is a discharge that is not covered by this permit per Permit Requirement 1.9.1.

Other concerns noted onsite were that the operational Solidifying Station and the gravel washout (under construction) were not permitted, and the modifications require review and approval by an NPDES permit engineer at ADEQ. Some of the solids from the Solidifying Station had been tracked out of containment and onto the lot; however, drainage of this area is controlled directly into the washout bay; and therefore, through the flume and into the pit. Once the gate in the flume is addressed, light tracking from the Solidifying Station will not be an issue.

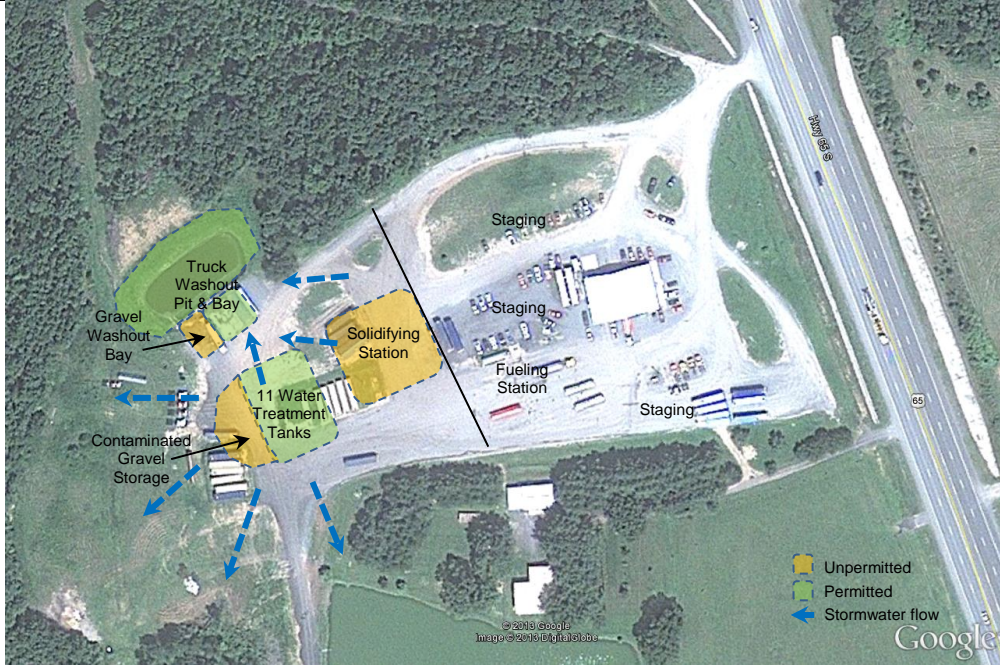
The site should be evaluated for additional outfalls, specifically on the west side where contaminated gravel will be stockpiled and stored before it is washed out in the newly constructed bay.

A modification to the No Discharge Permit 4984-WR-3 is currently in process to cover the unpermitted Solidifying Station and the gravel washout being constructed; however, a modification request must also be issued for coverage under the NPDES program as these are two separate permits – one through the state and the other through EPA and enforced by ADEQ. ADEQ contact information has been provided to M&M and a response requested.

PDS #070820

Water Division Photographic Evidence Sheet

Location:	M & M Environmental Oil Field Services (35.394649 -92.391981)				
Photographer:	Stephen DiGiacomo		Witness:		
Photo #	1	Of	6	Date:	03-28-2013
Description:	Site Identification (2009 DigitalGlobe Imagery – 1 meter resolution) All modifications, storage, staging areas, fueling, out buildings, etc. should be on the SWPPP maps.				



Photographer:	Stephen DiGiacomo		Witness:	Sam McFadin	
Photo #	2	Of	6	Date:	03-12-2013
Description:	Washout pit and flume in the foreground; wash bay to the left and newly constructed gravel washout bay to the right; dried solids from the flume noted on the riprap running down the swale to Outfall #2.				



Location:	M & M Environmental Oil Field Services – back lot						
Photographer:	Stephen DiGiacomo			Witness:	Sam McFadin		
Photo #	3	Of	6	Date:	03-12-2013	Time:	1304
Description:	Gravel washbay under construction; washbay and pressure washer shack; fenced washout pit in the background						



Photographer:	Stephen DiGiacomo			Witness:	Sam McFadin		
Photo #	4	Of	6	Date:	02-15-2013	Time:	1328
Description:	Solidifying Station completely lined with concrete pad and walls with an additional gravel berm; pelletized lime and saw dust stored near the fence inside a large bermed area; the contour of the gravel drive directs runoff from solids tracked out by equipment to the washout pit.						



Location:	M & M Environmental Oil Field Services – back lot						
Photographer:	Stephen DiGiacomo			Witness:	Sam McFadin		
Photo #	5	Of	6	Date:	03-12-2013	Time:	1328
Description:	Lime and sawdust storage;						



Photographer:	Stephen DiGiacomo			Witness:	Sam McFadin		
Photo #	6	Of	6	Date:	03-12-2013	Time:	1310
Description:	Water Treatment facility – water is treated for reuse through a series of 11 settling tanks. A modification was issued for this process, but the SWPPP was not updated.						



Oil & Gas Violation Summary Sheet

- No Violations Noted
- Placing Waste
- Permitting Issues
- Spills & Leaks
- Turbidity, etc. (Regulation #2 Violations)
- Stormwater &/or Erosion Issues
- Notification/Reporting Violations
- Unpermitted Discharges
- Record Keeping/Paperwork Violations
- Trash/Unauthorized Fluids in Pits
- Improper Closure of Pit
- Insufficient Freeboard
- Poor Pit Construction
- Other (Describe):