

# ADEQ

ARKANSAS  
Department of Environmental Quality

April 17, 2013

Mr. Rod Krug  
Triple Transport, Inc.  
112 Midsouth Drive  
Judsonia, AR 72081

RE:      AFIN: 71-00386  
          FACILITY: Clinton Triple Transport Washout Facility

PERMIT NO.: 5075-W  
COUNTY: Van Buren

Dear Mr. Krug:

On April 5, 2013, I performed an inspection of the above referenced waste treatment and disposal facility in accordance with the provisions of the Arkansas Water and Air Pollution Control Act, and the regulations promulgated thereunder. At the time of the inspection, there were no violations observed.

***Please refer to the Summary of Findings/Comments section of the inspection form for comments and areas of possible concern. In addition, I spoke with Mr. Britt Varner, Clinton Yard Manager, in regards to any potential issues concerning this site.***

If I can be of any assistance, please contact me at 479-968-7339, ext. 15, or via email at [youngd@adeq.state.ar.us](mailto:youngd@adeq.state.ar.us).

Sincerely,



David Young  
Oil and Gas Field Inspector  
Water Division

cc:      Britt Varner, Triple Transport, [bvarner@tripletransportinc.net](mailto:bvarner@tripletransportinc.net)

## ARKANSAS DEPARTMENT OF ENVIRONMENTAL QUALITY

## NO DISCHARGE INDUSTRIAL PERMIT INSPECTION FORM

AFIN: **71-00386** Log No.: \_\_\_\_\_Permit No.: **5075-W** Inspection Date: **April 5, 2013**Media: **Water** Inspector: **David Young**Compliance Status: ☒ IN / ☐ OUT

1A. Name of Facility: **Triple Transport, Inc. (Clinton Facility)**  
Address: **1085 Highway 95 East, Clinton, AR 72031 (35.554025N, -92.436064W)**  
County: **Van Buren**

2A. Name of On-Site Representative: **Chastity Bradford & Britt Varner**

3A. Name of Responsible Official: **Rod Krug**  
**Triple Transport, Inc.**  
**112 Midsouth Drive**  
Address: **Judsonia, AR 72081** Telephone: **501-388-2404**

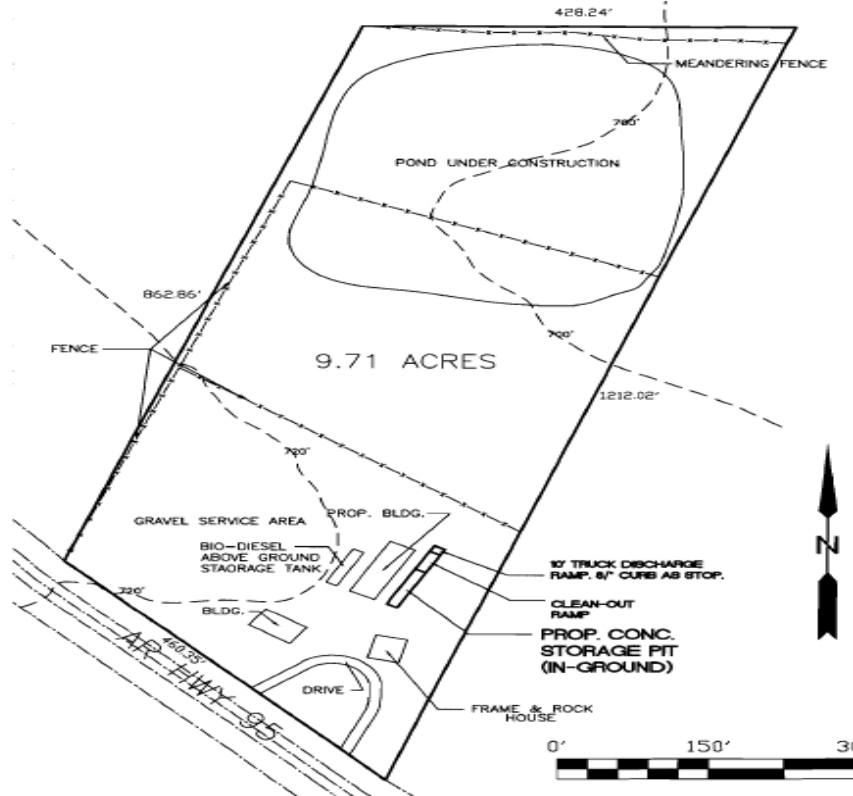
4A. Parent Company: **N/A**  
Address: **N/A** Telephone: **N/A**

5A. Description of Process (including type of industry, materials produced, and major by-products): **The facility was permitted for the operation of a truck washout and waste disposal system of gas well operations generated fluids. The truck washout and storage facility was removed in February of 2011 and has not been replaced at the time of the inspection.**

6A. Any complaints registered against this permitted facility? ☒ Yes ☐ No  
**January 27, 2011. Stated that Triple Transport was dumping drilling fluid on the ground at their facility.**  
If yes, give date and description of complaint: \_\_\_\_\_

7A. Are there any additions, modifications, or corrections to the facility since the last inspection? ☒ Yes ☐ No  
**The truck washout and storage facility was removed in February of 2011 and has not been replaced at the time of the inspection.**  
If yes, explain: \_\_\_\_\_

- 1B. Furnish a simplified flow diagram of the treatment system and include main components, flow sequence through plant, and calculated or estimated flows.



- 2B. Nearest Stream: Unnamed tributary of Choctaw Creek.

- 3B. Does wastewater from this facility cause adverse effect on the waters of the State:

☐ Yes ☒ No

If yes, describe: The discharge of waste fluids from this facility to waters of the State is prohibited.

- 4B. Are operating records kept as required by permit? ☐ Yes ☒ No ☐ N/A

If no, explain: All operating records have been transferred to the Judsonia main office since wastes are no longer stored or transported on site.

- 5B. Are maintenance records kept as required by permit? ☐ Yes ☐ No ☒ N/A

If no, explain: Maintenance records not required by permit.

- 6B. Are Samples routinely taken? ☐ Yes ☐ No ☒ N/A

- 7B. Does the sampling program meet the requirements of the permit?

☐ Yes ☐ No ☒ N/A

If no, explain: No samples required by permit.

8B. What laboratory does the facility use? N/A

Address: \_\_\_\_\_ Telephone: \_\_\_\_\_

1C. Do laboratory procedures and records meet the requirements of the permit?

☐ Yes ☐ No ☒ N/A

If no, explain: N/A

2C. Is contaminated runoff a problem?

☐ Yes ☒ No ☐ N/A

If yes, explain: No contaminated runoff observed during inspection.

3C. Is sludge disposal required?

☒ Yes ☐ No ☐ N/A

**Solids were previously transported to an approved disposal facility. Solids are not**

**generated at this time.**

If yes, describe (including final destination): \_\_\_\_\_

4C. Is the treatment system being properly operated and maintained as required by permit?

☐ Yes ☐ No ☒ N/A

If no, explain The treatment system has been removed and a new approved system has not been built.

### SUMMARY OF FINDINGS/COMMENTS

This facility was last inspected by Risa Parker, District 9 Inspector, on January 28, 2011. Several violations of this permit were cited during that investigation. Triple Transport responded to those violations by cleaning up waste and removing the truck washout and storage facility. The company's trucks are no longer washed out at this site. Triple Transport uses J.T.'s Washout (an ADEQ approved facility) in Quitman for this. This site now only performs maintenance on transport rigs and serves as a storage facility. There were 15 empty frac tanks being stored on the north side of the property.

I spoke with Chastity Bradford onsite and Britt Varner via telephone, and I told them of the following concerns:

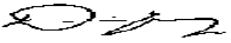
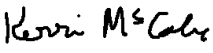
1. Folded up used plastic liners (used for temporary berms around frac tanks) were on the ground next to a diesel storage tank. I told Britt that these should be disposed of or stored under cover from rain.
2. Hoses used to transfer fluids to and from transport trucks were being stored on the ground. I told Britt that these should be disposed of or stored under cover from rain.

3. There was a large oil stain on the ground adjacent to a covered storage area for oils and other fluids. I told Britt that this area should be cleaned and steps should be taken to avoid further spills.

I did not observe any significant erosion or sedimentation issues at this facility. Other than mentioned above, no evidence of significant spills or releases of fluids or solids to the environment from this facility were found at the time of the inspection. I will return to the site in approximately two weeks from this date to ensure that the above noted concerns have been addressed.

PDS #071113

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Inspector Signature:	David Young 	Date of Report:	April 8, 2013
Signature of Reviewer:	Kerri McCabe 	Date of Review:	April 11, 2013

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<b>Water Division No Discharge Industrial Photographic Evidence Sheet</b>							
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<b>Location:</b>	Clinton Triple Transport Washout Facility (35.554025N, -92.436064W)						
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<b>Photographer:</b>	David Young				<b>Witness:</b>	None	
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<b>Photo #</b>	1	<b>Of</b>	6	<b>Date:</b>	4-5-13	<b>Time:</b>	1112
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<b>Description:</b>	Site Identification.						
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<b>Photographer:</b>	David Young				<b>Witness:</b>	None	
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<b>Photo #</b>	2	<b>Of</b>	6	<b>Date:</b>	4-5-13	<b>Time:</b>	1114
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<b>Description:</b>	Oil stain on ground next to fluid storage area.						
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<b>Water Division No Discharge Industrial Photographic Evidence Sheet</b>							
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<b>Location:</b>	Clinton Triple Transport Washout Facility (35.554025N, -92.436064W)						
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<b>Photographer:</b>	David Young				<b>Witness:</b>	None	
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<b>Photo #</b>	3	<b>Of</b>	6	<b>Date:</b>	4-5-13	<b>Time:</b>	1114
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<b>Description:</b>	Plastic liner used for temporary berms for frac tanks on the ground; exposed to rain.						
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<b>Photographer:</b>	David Young				<b>Witness:</b>	None	
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<b>Photo #</b>	4	<b>Of</b>	6	<b>Date:</b>	4-5-13	<b>Time:</b>	1116
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<b>Description:</b>	Hoses used to transfer fluids on the ground; exposed to rain.						
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Water Division No Discharge Industrial Photographic Evidence Sheet							
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<b>Location:</b>	Clinton Triple Transport Washout Facility (35.554025N, -92.436064W)						
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<b>Photographer:</b>	David Young			<b>Witness:</b>	None		
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<b>Photo #</b>	5	<b>Of</b>	6	<b>Date:</b>	4-5-13	<b>Time:</b>	1117
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<b>Description:</b>	Empty frac tanks on north side of the facility.						
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<b>Photographer:</b>	David Young			<b>Witness:</b>	None		
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<b>Photo #</b>	6	<b>Of</b>	6	<b>Date:</b>	4-8-13	<b>Time:</b>	N/A
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<b>Description:</b>	Satellite view of the facility.						
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## Oil & Gas Violation Summary Sheet

- ☒ No Violations Noted
- ☐ Placing Waste
- ☐ Permitting Issues
- ☐ Spills and Leaks
- ☐ Turbidity (Regulation #2 Violations)
- ☐ Stormwater/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):