



ARKANSAS
Department of Environmental Quality

December 17, 2010

John McClung
JM Oilfield Service, Inc.
4 Melody Lane
Quitman, AR 72131

RE: AFIN: 12-00456

Permit No.: 5071-W

Dear Mr. McClung:

On November 18, 2010, I performed a routine compliance inspection of the waste treatment and disposal facility in accordance with the provisions of the Arkansas Water and Air Pollution Control Act and the regulations promulgated thereunder. This inspection revealed the following violations:

- 1. The wash pit was found to be in operation without receiving a letter of authorization to operate from the Department. This is a violation of part I, Specific Condition 4 of the permit. The facility should submit a construction certification as required.*
- 2. Placing waste in a location likely to pollute waters of the State. This is a violation of the Arkansas Water and Air Pollution Act 8-4-217(a)(2). I observed sand and other material on the ground near the southeastern corner of the wash building. I observed storm water flowing through the material and entering a storm drain which discharges into a tributary which flows through the facility. I also observed some solids on the ground near the frac tanks located at the northwestern corner of the facility. The facility should clean up materials as needed to prevent the material from entering any waters of the State.*

The above items require your immediate attention. Please submit a written response to these findings to Cindy Garner, Water Division Enforcement Branch, at the address at the bottom of page one of this letter. This response should contain detailed documentation describing the course of action taken to correct the items noted. This corrective action should be completed as soon as possible, and the written response is due by *December 27, 2010*.

For additional information you may contact the enforcement branch by telephone at 501-682-0639 or by fax at 501-682-0910.

John McCLung, LM Oilfield Service, Inc.
December 17, 2010
Page 2

If I can be of any assistance, please contact me at harmont@adeq.state.ar.us or 479-968-7339 extension 14.

Sincerely,



Travis Harmon
District 5 Field Inspector
Water Division

cc: Water Division Enforcement Branch
Water Division Permits Branch

ARKANSAS DEPARTMENT OF ENVIRONMENTAL QUALITY

NO DISCHARGE INDUSTRIAL PERMIT INSPECTION FORM

AFIN: **12-00456** Log No.: _____

Permit No.: **5071-W** Inspection Date: **11/18/10**

Media: **Water** Inspector: **Travis Harmon**

Compliance Status: " IN / OUT

1A. Name of Facility: **JM Oilfield service, Inc.**
 Address: **4 Melody Lane, Quitman, AR 72131**
 County: **Cleburne**

2A. Name of On-Site Representative: **Jerry McClung & Kevin Carroll**

3A. Name of Responsible Official: **John McClung**
 Address: **4 Melody Lane, Quitman, AR 72131** Telephone: **501-589-4044**

4A. Parent Company: **None**
 Address: _____ Telephone: _____

5A. Description of Process (including type of industry, materials produced, and major by-products): **Washout of interior and washing of exterior of tankers hauling drilling fluids/mud.**

6A. Any complaints registered against this permitted facility? "Yes No
 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
 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.

Covered wash area discharges to pit. Facility has implemented a metal container placed inside the pit for containing fluids and material.

2B. Nearest Stream: Un-named tributary of Ligon Creek

3B. Does wastewater from this facility cause adverse effect on the waters of the State?
 " Yes No

If yes, describe: _____

4B. Are operating records kept as required by permit? " Yes "No N/A
 If no, explain: _____

5B. Are maintenance records kept as required by permit? " Yes "No N/A
 If no, explain: _____

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: _____

8B. What laboratory does the facility use? _____
 Address: _____ Telephone: _____

1C. Do laboratory procedures and records meet the requirements of the permit?
 " Yes "No N/A
 If no, explain: _____

2C. Is contaminated runoff a problem? " Yes "No N/A
 If yes, explain: _____

3C. Is sludge disposal required? " Yes "No N/A
 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 _____

SUMMARY OF FINDINGS/COMMENTS

Inspection conducted as result of a complaint received concerning the clean up and disposal of material form a tanker truck accident.

Violations:

1. The wash pit was found to be in operation without receiving a letter of authorization to operate from the Department as required in Part I, Specific Condition 4 of the permit.
2. Placing waste in a location likely to pollute waters of the State. I observed sand and other material on the ground near the southeastern corner of the wash building. I observed storm water flowing through the material and entering a storm drain which discharges into a tributary which flows through the facility. I also observed some solids on the ground near the frac tanks located at the northwestern corner of the facility.

Inspector Signature: *Travis Harmon*

Date of Report: 12/9/10

Signature of Reviewer: *Dale D. Washam*

Date of Review: December 13, 2010

Email correspondence with permitting:

From: Hill, Cara
Sent: Wednesday, December 08, 2010 1:02 PM
To: Harmon, Travis
Subject: RE: JM Oilfield services

[We haven't because we haven't received his construction certification.](#)
Cara

-----Original Message-----
From: Harmon, Travis
Sent: Wednesday, December 08, 2010 12:50 PM
To: Hill, Cara
Subject: JM Oilfield services

Cara,

We inspected recently due to a tanker truck spill. Has the Department issued a letter of authorization to operate as listed in condition 4?

Is AFIN 12-00456
Permit 5071-W

Thanks,
Travis Harmon
ADEQ Water D5
479-968-7339x14

Water Division No Discharge Industrial Photographic Evidence Sheet							
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Location:	JM Oilfield Service, Inc.						
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Photographer:	Travis Harmon			Witness:	David Young, Kerri McCabe, Risa Parker		
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Photo #	1	Of	6	Date:	11/18/10	Time:	15:09
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Description:	Wash pit with metal container in place inside the pit. The facility was operating the wash pit on the date of inspection.						
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Photographer:	Travis Harmon			Witness:	David Young, Kerri McCabe, Risa Parker		
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Photo #	2	Of	6	Date:	11/18/10	Time:	1507
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Description:	Sand and solids on the ground near the southeast corner of the wash building.						
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Water Division No Discharge Industrial Photographic Evidence Sheet							
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Location:	JM Oilfield Service, Inc.						
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Photographer:	Travis Harmon			Witness:	David Young, Kerri McCabe, Risa Parker		
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Photo #	3	Of	6	Date:	11/18/10	Time:	1510
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Description:	View of storm water flowing from area where sands and solids were on the ground (in front of loader).						
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Photographer:	Travis Harmon			Witness:	David Young, Kerri McCabe, Risa Parker		
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Photo #	4	Of	6	Date:	11/18/10	Time:	
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Description:	The water in photo 3 enters this storm drain and discharges to a tributary running through the middle of the facility.						
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Water Division No Discharge Industrial Photographic Evidence Sheet

Location:	JM Oilfield Service, Inc.						
Photographer:	Travis Harmon		Witness:	David Young, Kerri McCabe, Risa Parker			
Photo #	5	Of	6	Date:	11/18/10	Time:	
Description:	Outfall of storm drain shown in photo 4.						



Photographer:	Travis Harmon		Witness:	David Young, Kerri McCabe, Risa Parker			
Photo #	6	Of	6	Date:	11/18/10	Time:	
Description:	Material on the ground near the frac tanks at the northwest corner of the facility.						



Labeled GoogleEarth Image of facility.



ADEQ

ARKANSAS
Department of Environmental Quality

January 19, 2011

John McClung
JM Oilfield Service, Inc.
4 Melody Lane
Quitman, AR 72131

RE: AFIN: 12-00456 Permit No.: 5071-W

Dear Mr. McClung:

The Department has received your response to the November 18, 2010 inspection of your facility by our District Field Inspector, Travis Harmon. Your response has been deemed deficient for the following reasons:

1. The response did not contain detailed documentation (i.e. photos) of the items addressed in the December 27, 2010 response letter.
2. Failure to submit the construction certification to the Water Division Permits Branch.

A copy of the inspection report and the inadequate response is included with this letter for your review. Please submit photos of the corrective actions to Cindy Garner, Water Enforcement Branch Manager, and the construction certification to Cara Hill, Water Division Permits Branch, by **February 4, 2011**. Failure to adequately respond by this date will be considered in determining the enforcement action, if required, for this construction site.

Thank you for your attention to this matter. Should you have any questions, feel free to contact me at 501-683-3475 or you may e-mail me at carlsonm@adeq.state.ar.us.

Sincerely,



Michelle Carlson
Enforcement Analyst
Water Division Enforcement Section

cc: Cara Hill: hillc@adeq.state.ar.us or 501-682-0045

ADEQ

A R K A N S A S
Department of Environmental Quality

February 2, 2011

John McClung
JM Oilfield Service, Inc.
4 Melody Lane
Quitman, AR 72131

RE: Permit No.: 5071-W AFIN: 12-00456

Dear Mr. McClung:

The Department has received your response to the November 18, 2010 inspection of your facility by our District Field Inspector, Travis Harmon. Your letter appears to adequately address the discrepancies identified during the visit. The Department assumes the corrective actions taken will be maintained to ensure consistent compliance with the requirements of the permit. Acceptance of this response by the Department does not preclude any future enforcement action deemed necessary at this site or any other site.

The Department will keep the inspection and response on file. If future violations occur that require enforcement action, the Department will consider the inspection and response as required by the Pollution Control and Ecology Commission Regulation No. 7, Civil Penalties. This regulation requires the Department to consider the past history of your site and how expeditiously the violations were addressed in determining any civil penalty that may be necessary for any future violations.

If we need further information concerning this matter, we will contact you. Thank you for your attention to this matter. Should you have any questions, feel free to contact me at 501-683-3475 or you may e-mail me at carlsonm@adeq.state.ar.us.

Sincerely,



Michelle Carlson
Enforcement Analyst
Water Division Enforcement Branch



Progress Report

Date: January 31, 2011
Arkansas Department of Environmental Quality
Water Division, Permits Section
5301 Northshore Drive
North Little Rock, AR 72118-5317
Phone: 501-682-0650 Fax: 501-682-0910

RE: No Discharge Permit 5071-W
AFIN: 12-00456

Subject: Correspondence between JM Oilfield Services and ADEQ

To: Cindy Garner
Water Division Enforcement Branch
garner@adeq.state.ar.us

C/C: Cara Hill
Engineer Supervisor State Permits Branch
501-682-0045
hillc@adeq.state.ar.us

On November 18, 2010 Travis Harmon conducted a routine compliance inspection. During the inspection there were three areas of concern brought to the attention of JM Oilfield Services;

1. No discharge permit (non active permit)
Permit Status: The **construction certification** was not submitted to the ADEQ permitting department so a **letter of authorization to operate** could be issued.
Corrective Action:

The engineer recommended we add additional height to the concrete wall. JMO has completed the task as reflected in the photos.

The **construction certification** is included in this package.



2. Improper storage of solids that may cause runoff water to be polluted prior to entering the drain system.
JM Oilfield Services has removed the solid materials in question and cleaned the area reflected as ADEQ Photo 2 of 6 and Photo 4 of 6. Please refer to the photos in this package for verification.





3. The fine silt and sands that are being washed from the high points of the property to the lowest point of the property by storm water runoff.
Please refer to the photos that reflect the straw placed in the path of the storm water to prevent the fine silt and sands from being discharge into the storm water drainage ditch that borders JMO property.

Thank you

If you have any questions or require any more details regarding this matter please contact

JMO HR and Safety Manager
Kevin Carroll
501-589-4044
kevin_carroll@jmoilfieldservices.com