

ADEQ

ARKANSAS
Department of Environmental Quality

May 4, 2009

Mr. Chris Wilson, Health, Safety and Environment Supervisor
Calfrac Well Services
164-Hwy 64 West
Beebe, AR 72012

Re: Complaint Investigation on May 1, 2009

Dear Mr. Wilson:

On May 1, 2009, I performed a routine compliance inspection of the above referenced facility in response to a complaint. The complaint alleged that acidic wastewater was being dumped onto the ground without a valid permit or treatment. The inspection was conducted in accordance with the provisions of the Federal Clean Water Act, the Arkansas Water and Air Pollution Control Act, and the regulations promulgated thereunder. The inspection revealed the following:

1. Noncontact cooling water is being discharged to the waters of the state without a valid permit in violation of the Arkansas Water and Air Pollution Control Act (A.C.A. § 8-4-217(b)(1)). The noncontact cooling water must either be discharge to the local sanitary sewer system or you must obtain a permit from the Department. The Department has a general permit for noncontact cooling water. The Notice of Intent (NOI) for coverage under the general permit can be obtained on the Department's web site at: http://www.adeq.state.ar.us/water/branch_permits/general_permits/default.htm
2. There appears to have been a discharge of concrete washout or fly ash on the site grounds that stopped just prior to reaching the waters of the state. Also, there was evidence of oil or chemical spills that have not been sufficiently cleaned up. Absorbent materials had been applied to the spills, but the material was still on the ground and exposed to rain fall. This is placing waste where it is likely to cause pollution in violation of the Arkansas Water and Air Pollution Control Act (A.C.A. § 8-4-217(a)(2)).
3. After discussion with ADEQ Stormwater Engineers and a review of applicable SIC Codes, the Department has determined that this facility will require an Industrial Stormwater Permit. This general permit is currently in the renewal process and you will not be able to obtain a permit until the reissue process is complete. Please contact Jamal Solaimanian, Branch Manager, Stormwater Permits at 501-682-0620 for more information about the industrial stormwater permit.

The above items require your immediate attention. Please submit a written response to these findings to the Cindy Garner, Technical Assistance Manager, Enforcement Branch of this Department. This response should contain 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 **May 25, 2009**.

If I can be any assistance, please contact me at benson@adeq.state.ar.us or 501-683-0827.

Sincerely,



Dennis Benson
District 9 Field Inspector
Water Division

cc: Water Division Enforcement Branch
Water Division Permits Branch

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Department of Environmental Quality

Photographic Evidence Sheet

Location:	Calfrac Well Services						
Photographer:	Dennis Benson			Witness:	None		
Photo #	1	Of	5	Date:	05/01/09	Time:	11:00 am
Description:	Material that has been discharged onsite. Photographer standing at stream's edge.						
							
Photographer:	Dennis Benson			Witness:	None		
Photo #	2	Of	5	Date:	05/01/09	Time:	10:55 am
Description:	Spill from totes that is exposed to rainfall.						
							

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Photographic Evidence Sheet


Location:	Calfrac Well Services						
Photographer:	Dennis Benson			Witness:	None		
Photo #	3	Of	5	Date:	05/01/09	Time:	10:54 am
Description:	Spent chemical totes stored outside, exposed to rainfall.						
							

Photographer:	Dennis Benson			Witness:	None		
Photo #	4	Of	5	Date:	05/01/09	Time:	10:54 am
Description:	Spill mat under tanker to catch leaks from valves.						
							

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Photographic Evidence Sheet

Location:	Calfrac Well Services						
Photographer:	Dennis Benson			Witness:	None		
Photo #	5	Of	5	Date:	05/01/09	Time:	10:58 am
Description:	Spilled or discharged materials in the grassy area adjacent to laboratory.						
							



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Water Division Complaint Report

COMPLAINT INFORMATION			
GPS LOCATION:		AFIN:	
DATE RECEIVED: 05/01/09		PERMIT#:	
COMPLAINANT NAME: Anonymous		COUNTY: White	
ADDRESS:		COMPLAINT AGAINST: Calfrac Well Services	
PHONE:		ADDRESS: 164-Hwy 64 West, Beebe, AR 72012	
		PHONE:501-882-4000	
TRACKING & REFERRAL INFORMATION			
PERSON RECEIVING REPORT: Janice Lewis	DATE: 05/01/09	SUPERVISOR REFERRAL: Eric Fleming	DATE: 05/01/09
INSPECTOR REFERRAL:	DATE:	MEDIA SUPERVISOR REFERRAL:	DATE:
PHONE REFERRAL CONTACT:	DATE:	RECEIVING INSPECTOR: Dennis Benson	DATE: 05/01/09
DETAILED DESCRIPTION			
<p>Facility is dumping acid water onto the ground.</p>			
LOCATION			
<p>From North Little Rock, take Highway 67/167 North to Beebe. Take the Highway 64 exit and go west approximately 1.5 miles. Facility is on the right.</p>			
PREVIOUS COMPLAINT: <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO DATES:			
DISCHARGE TO STREAM: <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO NAME OF STREAM:			
COMPLAINT RECEIVED BY: <input checked="" type="checkbox"/> PHONE <input type="checkbox"/> LETTER <input type="checkbox"/> VERBAL <input type="checkbox"/> INTERNET <input type="checkbox"/> EMAIL			

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Water Division Complaint Report

COMPLAINT INVESTIGATION	
COMPLAINT#:	AFIN: PERMIT#:
INSPECTOR: Dennis Benson	DATE: 05/01/09
ACTION TAKEN:	PHOTOS TAKEN: <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
<p>Arrived at the facility on 05/01/09 @ 10:40 am. Met with Chris Wilson, HSE Supervisor who escorted me around the facility. The laboratory complex on the hillside of the facility was visited and it was determined they discharge single pass noncontact cooling water from this operation. Told them would require a permit from ADEQ or connect it to city of Beebe. Toured the area around the laboratory. Chemical totes (empty and full) are stored in this area. Absorbent had been applied to spills in the area, but had not been swept up. These totes are exposed to rainfall. To the west of the laboratory building, an area where concrete or fly ash had been washed out in the grass and pavement was noted. This material came very close to the stream that flows through the property. This is placing waste. Completed inspection at 11:10 am.</p> <p>Discussed need for industrial stormwater permit with stormwater engineer. They believe the facility should have a stormwater permit because they do a lot of vehicle maintenance and transportation cleaning.</p>	
FURTHER ACTION:	
Draft noncompliance letter to permittee.	
INSPECTOR SIGNATURE:  Dennis Benson	DATE: 05/04/09

009817 5-25

HAND DELIVERED



May 14, 2009

ADEQ
Arkansas Department of Environmental Quality
5301 NORTSHORE DRIVE
North Little Rock, AR 72118-5317
Attention: Cindy Garner
Technical Assistance Manager

Dear Ms. Garner

This is a response to the routine compliance inspection that was conducted on May 1, 2009 by your District 9 Field Inspector, Mr. Dennis Benson. Mr. Benson visited our facility in response to an alleged complaint that acidic wastewater was being discharged onto the ground without a valid permit or treatment. After touring our facility Mr. Benson was satisfied that acidic wastewater was not being discharged. However, he did have concerns that non-contact cooling water was being discharged onto the ground and explained that non-contact cooling water must either be discharged to the local sanitary sewer system or we must obtain a general permit from the Department.

The non-contact cooling water has now been rerouted to the drain connected to the local sanitary sewer system. This was completed on 05/08/09. Please see attached photo's of drain installation.

Another concern by Mr. Benson was an area that appeared was a discharge of cement washout or fly ash on the grounds that had stopped just prior to reaching the waters of the state. He also noted evidence of oil or chemical spills that had not been sufficiently cleaned up. He noted that absorbent materials had been applied to the spills, but the material was on the ground and exposed to rainfall.

The area that cement and fly ash had been discharged onto was removed on 05/11/09. This same area is scheduled to be topped with SB 2 rock and then compacted. Our scheduled completion date is 05/15/09. Please see attached photo's of area where cement and fly ash were removed

The area where Mr. Benson noted that absorbent materials were applied but not removed were immediately removed and disposed of on 05/01/09. Please see attached photo's of the area of concern.

In conclusion, it is Calfrac Well Services intent to file application for an Industrial Stormwater Permit for our facility here in Beebe, Arkansas. It is our understanding that a fee in the amount of \$200.00 is required for the application process. Please find the enclosed application fee of \$200.00 payable to the Department.

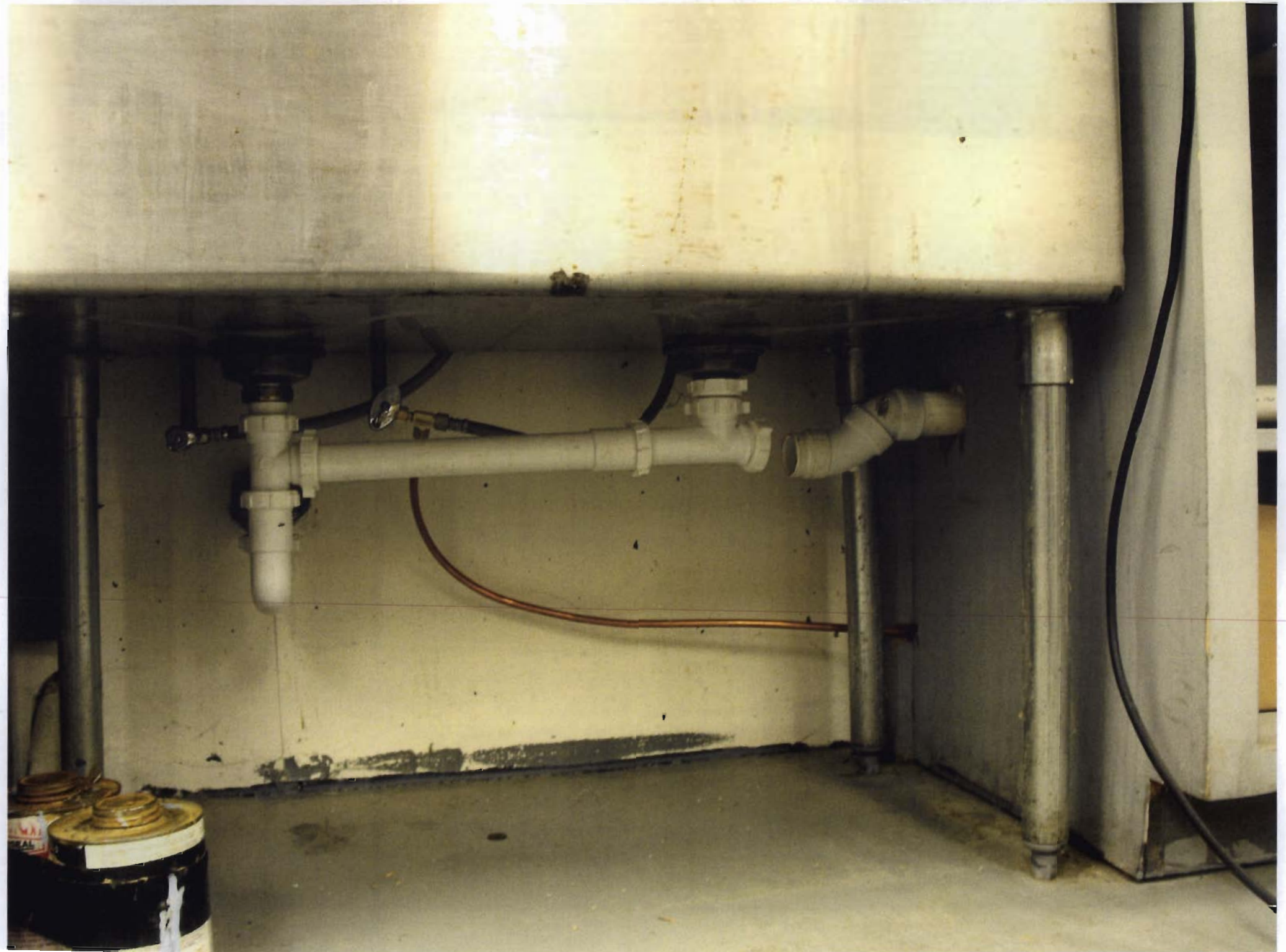
Sincerely,

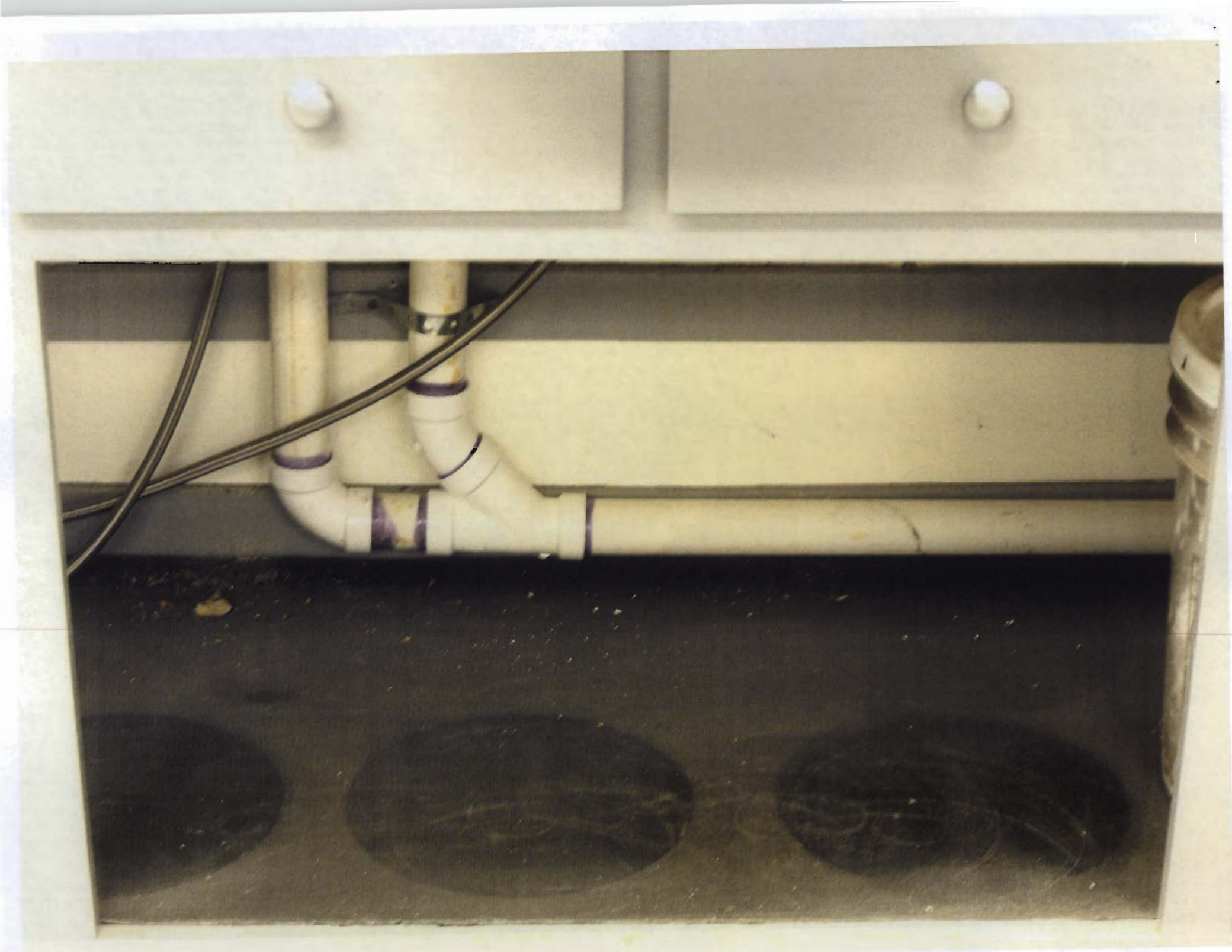
Chris M. Wilson
Chris M. Wilson
HSE Supervisor























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ARKANSAS
Department of Environmental Quality

May 21, 2009

Chris M. Wilson, HSE Supervisor
CalFrac Well Services Corp.
164-Hwy 64 West«Address1»
Beebe, AR 72012

RE: Complaint Inspection, NPDES Permit Tracking Number N/A, AFIN 73-00000 Response to Inspection

Dear Mr. Wilson:

The Department has received your response to the May 1, 2009 inspection of your facility by our District Field Inspector, Dennis Benson. Your letter appears to adequately address the discrepancies identified during the visit as long as you obtain an industrial storm water permit. 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 company 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 501-682-0636 or you may e-mail me at boycej@adeq.state.ar.us.

Sincerely,



James D. Boyce
Enforcement Administrator
Water Division, Enforcement Branch

