

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8
RESOURCE CONSERVATION AND RECOVERY ACT**

BASIC INFORMATION

Facility Name: Oilfield Disposal Services **Facility Location:** 44.042009, -107.559782
RCRA ID: WYR000201673 **Mailing Address:** 8185 N Highway 14-16,
Gillette, Wyoming 82716
Notification Status: Non-notifier **Facility Contact:** Reuben Tarver,
307-689-6275
Date of Inspection: May 18, 2021 **Arrival Time:** 2:21 p.m.
Departure Time: 3:04 p.m.
Lead Inspector: Annette Maxwell, U.S. EPA

Other Attendees:

1. Kimberly Dickerson, U.S. Fish & Wildlife Service (FWS)
2. Dennis Lamb, Wyoming Department of Environmental Quality (WDEQ)

Type and Purpose of Inspection: Compliance Evaluation Inspection

Facility Type: Commercial Oilfield Waste Disposal Facility (COWDF)

Applicable Regulations to Inspection: RCRA Section 7003

Inspection Type: Unannounced Inspection
Joint: U.S. EPA, WDEQ and FWS

FACILITY INFORMATION

Company Ownership: Oilfield Disposal Service, Inc. (ODS)

General Facility and Process Description: The ODS facility (Facility) is a COWDF that receives RCRA Subtitle C-exempt E&P oilfield waste for storage, handling, and/or disposal. The Facility has been issued a permit to operate a COWDF by WDEQ. The Facility includes one evaporation pond, three open-top tanks used for separation of oil and water, eight storage tanks, and a tanker truck offload area.

TOUR INFORMATION

No opening conference was conducted because no site personnel were present at the time of the inspection.

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Areas of the Facility toured:

- evaporation ponds,
- tank battery, and
- tanker offload area.

Data Collected and Observations: During the inspection I observed that that a small amount of oil had accumulated at the eastern edge of the evaporation pond. Photo 1398.

In the tank storage area, I observed that the open-top tanks were covered with netting in good condition.

In the tank battery I observed two buckets containing liquid oil that were not covered with a closure device or physical barrier such as netting. I also observed a small amount of pooled oil on the ground inside secondary containment. Photos 1399 to 1402. Pooled oil in buckets and puddles that are not physically contained by covers or netting can present risk of harm to birds and other wildlife.

Oily waste that is not physically restricted from access by birds and other wildlife is a concern because of the potential for injury or mortality. Specifically, the small amount of oil on the evaporation pond and open buckets/pooled oil in the tank battery pose a potential threat to birds and other wildlife.

CLOSING CONFERENCE

No closing conference was conducted because no site representatives were present at the time of the inspection.

SIGNATURE

Lead Inspector: **ANNETTE
MAXWELL**
Signature and Date
Annette Maxwell, RCRA Inspector

Digitally signed by ANNETTE
MAXWELL
Date: 2021.07.08 15:04:24 -06'00'

Supervisor: **JANICE PEARSON**
Signature and Date
for:
Janice Pearson, Chief
RCRA/OPA Enforcement Branch

Digitally signed by JANICE
PEARSON
Date: 2021.07.14 14:42:50 -06'00'

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APPENDIX 1: PHOTO LOG

For all photos:

Photographer: Annette Maxwell

Camera Model and ID: Nikon Coolpix S7000, B00227

Photo 1398, DSCN1398.jpg, photo of evaporation pond facing southwest. Photo shows small amount of oil along the eastern edge of the evaporation pond.



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Photo 1399, DSCN1399.jpg, photo of tank battery. Close up of bucket is included in next photo.



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Photo 1400, DSCN1400.jpg, photo of bucket shown in photo 1399. Bucket is not netted or covered and contains liquid oil.



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Photo 1401, DSCN1401.jpg, photo of tank battery with pooled oil in foreground and a second uncovered bucket in background.



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Photo 1402, DSCN1402.jpg, close-up photo of bucket shown in photo 1402. Bucket is not netted or covered and contains liquid oil.

