



**Region 6 Compliance Assurance and Enforcement Division
INSPECTION REPORT**

Inspection Date(s):	02/26/2016		
Media:	Water		
Regulatory Program(s)	NPDES - Oil and Gas, Produced/Brine Water		
Company Name:	East Texas Salt Water Disposal Company		
Facility Name:	Anderson Center (RRC No. P001059)		
Facility Physical Location:	Approx. 0.26 miles from the intersection of Hwy 42 and Fischer Rd. (32.495353 N, -94.854310 W)		
(city, state, zip code)	Longview, Texas 75604		
Mailing address:	1209 Industrial Blvd.		
(city, state, zip code)	Kilgore, Texas 75662		
County/Parish:	Gregg County, Texas		
Facility Contact:	Patrick J. Nault	President	
FRS Number:	N/A		
Identification/Permit Number:	TXU011089		
Media Number:	N/A		
NAICS:	211111		
SIC:	1311		
Personnel participating in inspection:			
Jack Arias	6EN – WR	Environmental Scientist	(214) 665 – 8164
Jeanne Eckhart	6EN – WR	Environmental Scientist	(214) 665 – 8174
EPA Lead Inspector Signature/Date			
	Jack Arias		Date
Supervisor Signature/Date			
	Willie Lane		Date

Section I - INTRODUCTION

PURPOSE OF THE INSPECTION

The purpose of the inspection was to determine if the facility was in compliance with Section 301 of the Clean Water Act (CWA) and to identify and document discharges of produced wastewater (brine) to waters of the United States. The inspection was conducted under the authority of Section 308 of the CWA. EPA Region 6 inspectors, Jack Arias and Jeanne Eckhart, arrived at the East Texas Salt Water Disposal Company – Anderson Center facility at approximately 11:00 AM on February 26, 2016 for an unannounced inspection. There were no representatives present at the time of entry. We proceeded to conduct an oil and gas, produced/brine water Clean Water Act (CWA) inspection. The scope of the inspection is to evaluate the facility's tanks, flow lines, flow paths, ponds, tributaries, creeks, and other related factors that are connected to the CWA at the facility.

FACILITY DESCRIPTION

The facility is known as the East Texas Salt Water Disposal Company – Anderson Center and is located in Longview, Gregg County, Texas. The facility consists of an open produced water pit that collects produced fluids from nearby wells. See Photo Nos. 1 – 2 in Appendix 1. The facility's collection pit for produced water is located at latitude 32.495353 N and longitude -94.854310 W.

The lease consists of production wells, injection wells, vessels, flow lines, collection points, and other equipment used for the production of crude oil and natural gas. Production wells produce a mixture of produced water and crude oil (well fluids). Flow lines are used to transport well fluids from various locations on the leases. Collection points known as tank batteries consist of various tanks, vessels, and equipment used to separate and store the produced water, brine water, and crude oil. Produced water is typically high in salts and is commonly known as oil field brine. The crude oil is sold for profit and the produced water / brine, is transported to and disposed of in various injection wells. The facility also is connected to facilities that produce and commercially sell natural gas. The facility is located near Texas stream segment number 0505, which has designated use as a domestic public water supply. This facility is designated as an Energy Extraction Initiative facility.

Section II - OBSERVATIONS

When we arrived at this facility, specifically the open produced water collection pit, on February 26, 2016, we observed that the facility had a net over the pit. See Photo Nos. 3 - 5 in Appendix 1.

Anderson Center produced water pit located at latitude 32.495353 N and longitude -94.854310 W had one open pit where multiple produced water pipes dumped water into the pit from various well locations nearby. We observed that the produced water pit had oil staining, smelled strongly of hydrocarbons, and had oil on the surface of the pit. The open pit had a net over it to prevent wildlife, like birds from coming into contact with the produced fluids. We observed oil on the surface of the produced water in the pit. We obtained a Total Soluble Salts (TSS) reading of 77,300 parts-per-million

(ppm) taken at the facility at latitude 32.495076 N and longitude -94.856481 W. See Photo Nos. 2 – 6 in Appendix 1. The point of entry (POE), where fluids reached the tributary of the Sabine River was located at latitude 32.494894 N and longitude -94.855095 W. We obtained a TSS reading of 21,700 ppm at the POE. See Photo No. 7 - 8 in Appendix 1. At this location, the tributary of the Sabine River was approximately 2 foot deep and approximately 20 feet wide. See Photo Nos. 9 - 10 in Appendix 1. We observed produced fluids seeping below the south east corner of the production operations pit above the surface of the ground and entering the tributary of the Sabine River. We observed that the water flow at the tributary and subsequently the dilution of produced fluids (brine) upstream and downstream of the tributary was greater due to heavy precipitation events that occurred in the area. During the inspection we noticed high water marks, more sediments and debris at this location. See Photo No. 9 and 10 in Appendix 1. We obtained a TSS reading of 200 ppm approximately 0.86 miles downstream from the POE at latitude 32.485101 N and longitude -94.855709 W. Discolored foam was noted downstream from the POE located at latitude 32.494171 N and longitude -94.855386 W. See Photo No. 11 in Appendix 1.

Background Measurement upstream of tributary of the Sabine River

We measured the TSS to determine water quality data, such as water quality in the area, approximately 60 feet upstream of the POE to the tributary of the Sabine River. We measured TSS of 200 ppm at Latitude 33.494934 N and Longitude -94.854729 W. See Photo No. 12 in Appendix 1.

Section III – AREAS OF CONCERN

We observed during the inspection areas of concerns at this facility that included:

- Leaking produced fluids from the collection pit into the tributary of the Sabine River
- And high concentrations of TSS in the tributary of the Sabine River

Section IV – FOLLOW UP

The following follow-up actions will be conducted:

- EPA will send a copy of the inspection report to the facility.
- EPA will work with the facility to enable it to come into compliance with the requirements of the CWA.
- EPA will have a conference call with the facility to discuss the inspection report.

Section V – LIST OF APPENDICES

Appendix 1 – Photo Log – 12 photos taken on 02/26/2016 and 1 photo on 03/14/2016.

Appendix 1

Photograph Log



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

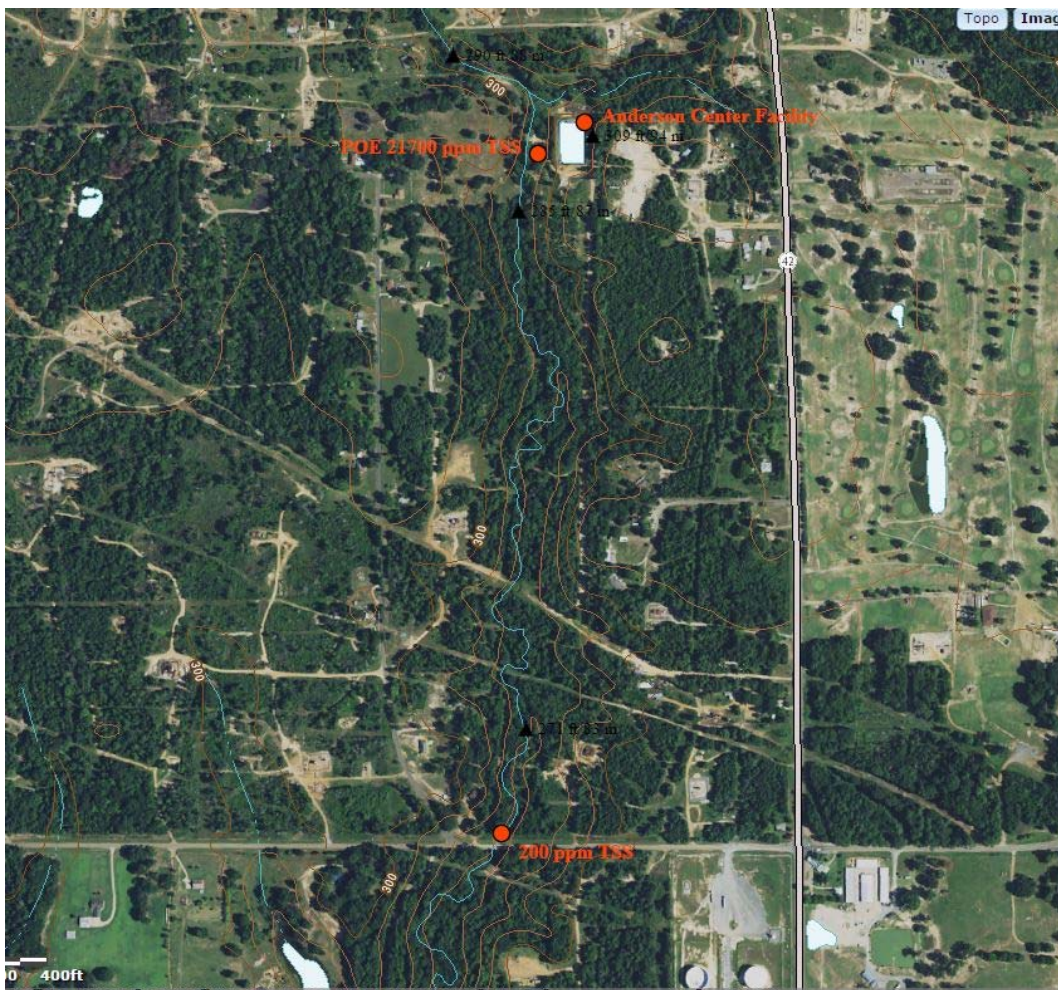
Photo No. 1

Location: Approx. 0.26 miles from the intersection of Hwy 42 and Fischer Rd.
(32.495353 N, -94.854310 W)

City: Longview

County/Parish: Gregg

State: Texas



Photograph File Name: USGS Topo imagery_East Texas Salt Water Disposal Company Anderson Center.JPG

Date of Photograph: 03/14/2016

Latitude: 32.495353 N

Longitude: -94.854310 W

Map Datum: WGS-84

Time of Photo: 4:21 PM

Photographer: Jeanne Eckhart

Description: This image shows a USGS Topo-Imagery map. The orange dots on the map are the facility, and field measurements taken during the inspection.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 2

Location: Approx. 0.26 miles from the intersection of Hwy 42 and Fischer Rd.
(32.495353 N, -94.854310 W)

City: Longview

County/Parish: Gregg

State: Texas



Photograph File Name: DSC_0747.JPG

Date of Photograph: 02/26/2016

Latitude: 32.495116 N

Longitude: -94.854241 W

Orientation: SW

Map Datum: WGS-84

Time of Photo: 11:37 AM

Photographer: Jeanne Eckhart

Description: This image shows the sign at the East Texas Salt Water Disposal Company – Anderson Center facility.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 3

Location: Approx. 0.26 miles from the intersection of Hwy 42 and Fischer Rd. (32.495353 N, -94.854310 W)		
City: Longview	County/Parish: Gregg	State: Texas



Photograph File Name: DSC_0746.JPG
Date of Photograph: 02/26/2016
Latitude: 32.494507 N
Longitude: -94.85092 W
Orientation: W
Map Datum: WGS-84
Time of Photo: 11:35 AM
Photographer: Jeanne Eckhart
Description: This image shows the open collection pit of produced water from the south east corner of the facility.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 4

Location: Approx. 0.26 miles from the intersection of Hwy 42 and Fischer Rd.
(32.495353 N, -94.854310 W)

City: Longview

County/Parish: Gregg

State: Texas



Photograph File Name: DSC_0745.JPG

Date of Photograph: 02/26/2016

Latitude: 32.494676 N

Longitude: -94.854729 W

Orientation: NE

Map Datum: WGS-84

Time of Photo: 11:33 AM

Photographer: Jeanne Eckhart

Description: This image shows open produced water collection pit from the south west corner of the facility.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 5

Location: Approx. 0.26 miles from the intersection of Hwy 42 and Fischer Rd.
(32.495353 N, -94.854310 W)

City: Longview

County/Parish: Gregg

State: Texas



Photograph File Name: DSC_0736.JPG

Date of Photograph: 02/26/2016

Latitude: 32.495353 N

Longitude: -94.854310 W

Orientation: S

Map Datum: WGS-84

Time of Photo: 11:09 AM

Photographer: Jeanne Eckhart

Description: This image shows the collection pit, where produced fluids from nearby wells in the area are piped to this pit.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 6

Location: Approx. 0.26 miles from the intersection of Hwy 42 and Fischer Rd.
(32.495353 N, -94.854310 W)

City: Longview

County/Parish: Gregg

State: Texas



Photograph File Name: DSC_0748.JPG

Date of Photograph: 02/26/2016

Latitude: 32.495076 N

Longitude: -94.856481 W

Orientation: S

Map Datum: WGS-84

Time of Photo: 11:40 AM

Photographer: Jeanne Eckhart

Description: This image shows a measurement of Total Soluble Salts (TSS) reading of 77,300 parts-per-million in the open produced water collection pit.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 7

Location: Approx. 0.26 miles from the intersection of Hwy 42 and Fischer Rd.
(32.495353 N, -94.854310 W)

City: Longview

County/Parish: Gregg

State: Texas



Photograph File Name: DSC_0739.JPG

Date of Photograph: 02/26/2016

Latitude: 32.493820 N

Longitude: -94.85383 W

Orientation: SE

Map Datum: WGS-84

Time of Photo: 11:17 AM

Photographer: Jeanne Eckhart

Description: This image shows Point of Entry (POE) below the south west corner of the open produced water collection pit. Produced wastewater is seeping from the soil into the tributary of the Sabine River.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 8

Location: Approx. 0.26 miles from the intersection of Hwy 42 and Fischer Rd.
(32.495353 N, -94.854310 W)

City: Longview

County/Parish: Gregg

State: Texas



Photograph File Name: DSC_0738.JPG

Date of Photograph: 02/26/2016

Latitude: 32.494894 N

Longitude: -92.855095 W

Orientation: S

Map Datum: WGS-84

Time of Photo: 11:16 AM

Photographer: Jeanne Eckhart

Description: This image shows POE, where a TSS reading of 21,700 ppm was taken. The produced water is seeping from the open produced water collection pit to the tributary of the Sabine River.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 9

Location: Approx. 0.26 miles from the intersection of Hwy 42 and Fischer Rd.
(32.495353 N, -94.854310 W)

City: Longview

County/Parish: Gregg

State: Texas



Photograph File Name: DSC_0741.JPG

Date of Photograph: 02/26/2016

Latitude: 32.493820 N

Longitude: -94.854383 W

Orientation: SE

Map Datum: WGS-84

Time of Photo: 11:20 AM

Photographer: Jeanne Eckhart

Description: This image shows a downstream view from the POE into the tributary of the Sabine River. Riparian vegetation, bed and bank, and high water marks were observed at this location during the inspection.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 10

Location: Approx. 0.26 miles from the intersection of Hwy 42 and Fischer Rd.
(32.495353 N, -94.854310 W)

City: Longview

County/Parish: Gregg

State: Texas



Photograph File Name: DSC_0740.JPG

Date of Photograph: 02/26/2016

Latitude: 32.493820 N

Longitude: -94.854383 W

Orientation: SW

Map Datum: WGS-84

Time of Photo: 11:19 AM

Photographer: Jeanne Eckhart

Description: This image shows an upstream view from the POE of the tributary of the Sabine River. We observed high water marks, riparian vegetation, and bed and banks at this location during the inspection.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 11

Location: Approx. 0.26 miles from the intersection of Hwy 42 and Fischer Rd.
(32.495353 N, -94.854310 W)

City: Longview

County/Parish: Gregg

State: Texas



Photograph File Name: DSC_0743.JPG

Date of Photograph: 02/26/2016

Latitude: 32.494171 N

Longitude: -94.855386 W

Orientation: SE

Map Datum: WGS-84

Time of Photo: 11:27 AM

Photographer: Jeanne Eckhart

Description: This image shows foam downstream from the POE in the tributary of the Sabine River. We observed a discolored foam on the surface downstream from the POE.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 12

Location: Approx. 0.26 miles from the intersection of Hwy 42 and Fischer Rd.
(32.495353 N, -94.854310 W)

City: Longview

County/Parish: Gregg

State: Texas



Photograph File Name: DSC_0744.JPG

Date of Photograph: 02/26/2016

Latitude: 32.494934 N

Longitude: -94.855282 W

Orientation: W

Map Datum: WGS-84

Time of Photo: 11:30 AM

Photographer: Jeanne Eckhart

Description: This image shows a background TSS reading of 200 ppm upstream from the POE in the tributary of the Sabine River. There were clear bed and banks, high water marks, and riparian vegetation observed at the time of the inspection.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 13

Location: Approx. 0.26 miles from the intersection of Hwy 42 and Fischer Rd.
(32.495353 N, -94.854310 W)

City: Longview

County/Parish: Gregg

State: Texas



Photograph File Name: DSC_0749.JPG

Date of Photograph: 02/26/2016

Latitude: 32.485101 N

Longitude: -94.855709 W

Orientation: SE

Map Datum: WGS-84

Time of Photo: 12:34 PM

Photographer: Jeanne Eckhart

Description: This image shows a downstream TSS reading of 200 ppm along the tributary of the Sabine River. This location was approximately 0.89 miles downstream from the POE.