



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6

**1445 ROSS AVENUE, SUITE 1200
DALLAS, TEXAS 75202-2733**

May 3, 2019

CERTIFIED MAIL: RETURN RECEIPT REQUESTED: 7009 2820 0001 8284 4768

Cris January
Owner
January Environmental Services, Inc.
4300 SW 36th St.
Oklahoma City, Oklahoma 73119

Re: EPA RCRA Case Development Inspection – March 28-29, 2019; EPA ID# OKD042146324
– January Environmental Services – Oklahoma City, Oklahoma

Dear Mr. January,

On March 28-29, 2019, The United States Environmental Protection Agency (EPA) conducted an unannounced Case Development Inspection (CDI) at the January Environmental Services in Oklahoma City, Oklahoma. I would like to thank you for the time and the courtesy your staff extended to our inspectors. Enclosed, please find a copy of the CDI Report which chronicles the inspection findings. A copy of this CDI Report will be transmitted separately to the Oklahoma Department of Environmental Quality (ODEQ).

Based on the information contained in the enclosed inspection report, there are areas of concern for which EPA may take enforcement action under the Resource Conservation and Recovery Act (RCRA). If you have not already done so, we encourage you to immediately address all compliance issues identified in the CDI Report.

If you have any questions regarding this matter, please contact Ms. Debra Pandak of my staff at (214) 665-7565 or email to pandak.debra@epa.gov.

Sincerely,

A handwritten signature in black ink, which appears to read "Jeff York".

For Mark Potts
Chief
Waste Enforcement Branch

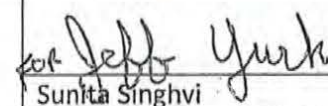
Enclosure

cc: Mike J. Edwards, Manager
RCRA Compliance & Enforcement
Department of Environmental Quality
P. O. Box 1677
Oklahoma City, OK 73101-1677

Region 6 Compliance Assurance and Enforcement Division

INSPECTION REPORT

Case Development Inspection (CDI)

Inspection Date(s):	03/28/2019 to 03/29/2019		
Media:	RCRA		
Regulatory Program(s)	Used Oil and Generator Requirements		
Company Name:	January Environmental Services Inc.		
Facility Name:	January Environmental Services Inc.		
Facility Physical Location:	4300 SW 36 th St.		
(city, state, zip code)	Oklahoma City, OK 73119		
Mailing address:	2701 S. Prospect		
(city, state, zip code)	Oklahoma City, OK 73129		
County/Parish:	Oklahoma		
Facility Contact:	Mr. Cris January	Owner	
	cris@januaryservices.com		
FRS Number:	None		
Identification/Permit Number:	OKD042146324		
Media Number:	None		
NAICS:	48422		
SIC:	None		
Personnel participating in inspection:			
Debra Pandak	U.S. EPA Region 6	Inspector	214-665-7565
Bill Mansfield	U.S. EPA Region 6	Inspector	214-665-7363
Roarke Blackwell	ODEQ	Inspector	405-702-5127
Cris January, Jr.	January Environmental Services	Operator	
EPA Lead Inspector Signature/Date			5/3/2019
	Debra Pandak		Date
Supervisor Signature/Date			5/3/2019
	Sunita Singhvi		Date

Section I – INTRODUCTION

PURPOSE OF THE INSPECTION

On 03/28/2019, I and fellow Region 6 inspector, Bill Mansfield and Oklahoma Department of Environmental Quality (ODEQ) inspector, Roarke Blackwell (EPA team), arrived at January Environmental Services Inc. (JES) at 1:00 p.m. to conduct an unannounced Case Development Inspection (CDI) to follow-up on the EPA inspection conducted in November 2017. On arrival several JES employees were on site. After we identified ourselves, the workers contacted the operator, Mr. Cris January, Jr. who was at the JES location on Prospect Avenue in Oklahoma City, Oklahoma. Workers left the site around 1:30 p.m. Mr. January arrived shortly before 2:00 p.m. I presented my credentials to Mr. January and explained we were there to do a follow-up inspection to review the facilities compliance since the EPA inspection conducted in November 2017.

Consistent with the RCRA Program Authorization Memorandum of Agreement, the ODEQ was notified in advance and invited to accompany the EPA during the inspection. This inspection was conducted under the authority of section 3007 of RCRA. The scope of the inspection was a review of the facility's compliance with its duties as a used oil transporter, processor and marketer, and as a hazardous waste transporter and generator.

This report serves as documentation of the observations made by the EPA team during the RCRA CDI. Photographs documenting observations made during the inspection are included in Appendix 1.

FACILITY DESCRIPTION

JES is located at 4300 SW 36th Street, Oklahoma City, Oklahoma County, Oklahoma. JES has been in operation at this location since 2000. The JES facility is bordered by Brown Transportation to the north, Chemical Linen Supply to the west, and a railroad and Newcastle Road to the east and south. JES regulatory notification was last updated with ODEQ in 2013 as a non-generator of hazardous waste, a Used Oil and Hazardous Waste Transporter, a Used Oil Processor, and a Used Oil Fuel Marketer.

Section II – OBSERVATIONS

This section documents the observations made during the inspection and includes reference to photographs taken during the inspection (Appendix 1). A table (Appendix 2) provides a list of concerns identified during the EPA 2017 inspection and concerns observed during this inspection.

Facility Walkthrough

The EPA team began the facility walkthrough on 03/28/2019 in the main warehouse escorted by Mr. January Jr. The inspection continued to the ER/ Maintenance building, the concrete pad behind the main warehouse and ER/Maintenance building, tank farm, and yard. On 03/29/2019, the EPA team

returned to observe the unloading and testing of used oil from a vacuum truck and revisited the warehouse and concrete pad areas.

Warehouse

The EPA team was escorted through the warehouse by Mr. January Jr. Mr. January Jr. identified the customer and content of the containers, if known, during the walkthrough. The front part of the warehouse contained (Appendix 1, Photos: 5, 6 & 7):

- Four (4) totes from Schlumberger: one full and a second half full of used oil (Appendix 1, Photo 5);
- Pump used by JES (Appendix 1, Photo 7);
- Empty used oil filter dumpsters;
- Open drum with no label containing used oil (Appendix 1, Photo 6);
- Two (2) empty drums with Subaru labeling;
- One tote with fracking gel. The oil would be pumped off and the remainder sent to landfill;
- Nine (9) drums containing spent carbon from RedCliff Midstream. Waste destined for the landfill, and
- One tote containing "Dmulz" (a product used in the used oil processing).

At the loading dock a truck box trailer was observed to contain totes and plastic buckets (Appendix 1, Photo 8). Mr. January Jr. said the totes and buckets were going to be hauled to a landfill. The recycling company JES used, is no longer accepting plastic. Recycler's name is Hite Plastics Inc.

In the mid-section of the warehouse, near the storage of overpacks and empty drums used by JES for emergency response services, Mr. January Jr. identified a collection of 8 drums as those "quarantined" after the 2017 EPA inspection. The EPA team identified drum #10 from the 2017 inspection that was sampled and tested for waste MEK (Appendix 1, Photo: 9 & 10). Drum #10 was not labeled and not on a pallet. The drums were stored without aisle space. Mr. January Jr. was asked to provide any documentation for the drums. Labeling on the remaining drums identified their contents as:

- One drum marked #10 EPA in yellow paint (Appendix 1, Photo 9)
- Two drums in front wrapped – water/used oil from roll-off # 25036
- Two drums in back – grease/water from roll-off # 25276D
- Two drums – grease/water from roll-off # C2576D
- One drum with no label.

The back part of the warehouse contained many 7-yard bins stacked for future use or repair, a product storage area and other 7-yard bins with compressor filters draining off the fluids (Appendix 1, Photos 11 & 12). A small metal container was observed holding a heating unit to contain leaking fuel. However, the container was leaking fuel to the concrete floor (Appendix 1, Photo 14).

The product storage area contained many oil and grease products (Delo 100 motor oil, engine flush, radiator flush, Nusol 21 high performance). Mr. January Jr. said they use some and try to find buyers for the materials. One drum was labeled non-hazardous waste solvent. Mr. January Jr. was not aware of what it was but would ask the employees. Across from the drum was a tote labeled "new solvent". Later that day we revisited the drum and the label was partially removed and Mr. January Jr. explained that it was product solvent that had come from the tote nearby, now labeled burner fuel (Appendix 1, Photo 27). Mr. January Jr. said it was left over from the tote after selling a customer 55-gallons (Appendix 1, Photo 13 & 28). Also, in the product area were green drums, some with bulging tops. Material in this area was staged without aisle space and could not be easily accessed for visual inspection.

ER and Maintenance Building

The EPA team observed five (5) drums on wood pallets labeled triethanolamine 99% (Appendix 1, Photo 16). Mr. January Jr. did not know if the drums contained product or waste. We asked him to provide information related to these drums. Also observed were four (4) Zep DYNA 143 drums in shrink wrapped. Mr. January Jr. indicated it was product they were looking to sell (Appendix 1, Photo 15).

Tank Farm

The EPA team observed tank 22 (cooker) relocated since the 2017 inspection and a new process was being installed. Mr. January Jr. said they were installing a flash tower and new heater. We asked for information on the process. The EPA team observed oil storage tanks 2, 16, 17 and 18 not labeled with the words "used oil" (Appendix 1, Photos 3 & 4).

Used Oil Filter Containers/Bins

We observed approximately 38 used oil filter containers (bins) behind the main warehouse. Mr. January Jr. said these were 4-yard bins (Appendix 1, Photo 17). Mr. January Jr. said the contents of these containers would eventually be emptied into the roll-off containers. He did not know how long the containers would sit before being put into the roll-offs.

Bins were staged in rows without aisle space. The EPA team was unable to gain access to all the bins except for the ones on the perimeter (Appendix 1, Photo 17). EPA observed the contents of several bins containing debris of various types, and used fuel and oil filters (Appendix 1, Photos 18, 24 & 25). A 7-yard bin, located against the warehouse wall, was full of soil. Mr. January Jr. was asked for waste profiles for all the bins and shipping papers.

Used oil filter bins were also located along the side and behind the ER/Maintenance Building (Appendix 1, Photos 21 & 26). These bins were delivered to the facility during the inspection and unloaded in this location (Appendix 1, Photo 23). Bins contained spill pads, frac sand, various filter types, tyvek, gloves, and soil (Appendix 1, Photo 22). The EPA team detected an odor when the lid of the bin containing soil was lifted. Some bins were located directly along the edge of the concrete pad adjacent to the ground with no berm or edging.

Roll-off Containers

The EPA team observed five (5) roll-offs behind the warehouse and near the ER/Maintenance Building. All roll-offs were covered with tarps. Mr. January Jr. rolled back the tarp on each roll-off to allow the EPA team to observe the contents and monitor using the PID.

Observations by roll-off unit number:

- #R25007: used oil, fuel and other filters, garbage bags, debris. (Appendix 1, Photos 19 & 20).
- #R25038: empty
- #DE-SW-439 or DE-NW-243: grease with rain water. Mr. January Jr. said drums put into the roll-off are taken to the landfill.
- #R25036: frac sand.
- #R25022 – used/spent carbon. Mr. January Jr. identifies the generator as RedCliff Midstream and contents destined for landfill.

Yard

The yard surrounding JES contained areas staging truck trailers, box trailers, tanker trailers, roll-offs and frac tanks. The EPA team observed each of the items. Roll-off #R205023 was mostly empty with some frac sand. A yellow roll-off contained frac sand. Truck box trailers were either empty or contained empty drums or empty used oil filter dumpsters. Frac tanks were in various stages of being used to store used oil as part of the JES storage process per Mr. January Jr. He estimated the size to be 20,000 gallons each. EPA observed seven (7) near the tank farm and two (2) in the yard area. Frac tanks were located directly on the ground outside of the tank farm secondary containment system.

During the walkthrough on 3/28/2019, a collection run returned a load to JES. The load contained used oil filter bins and several drums. On 3/29/2019, the load had been offloaded from the trailer. The customer was identified by Mr. January Jr. as KLX Energy and La Salle Co.

On 3/29/2019, the EPA team observed the offloading of a JES vacuum truck that had completed morning customer pickups. Mr. January Jr. explained that the employee would test the used oil using a sniffer. The employee (Daniel) conducted the testing at the top of the truck at the opening of each compartment of the tanker (Appendix 1, Photos 29 through 34). Mr. January Jr. said employees use the sniffer at the customer site and before unloading. A sample of used oil was collected and tested for specific gravity and water content.

Section III – AREAS OF CONCERN

Below are areas of concern based on the EPA inspection:

- One drum with a non-hazardous waste label, labeled as “solvent” (Appendix 1, Photo 13 & 28).

- Use of "sniffer" to determine halogen content of used oil (Appendix 1, Photos 29 through 33).
- Used oil filters observed in roll-off containers not crushed or punctured Appendix 1, Photos 19, 20, 23 & 24).
- No aisle space around totes and used oil filter bins (Appendix 1, Photo 17 & 26.
- Tanks 2, 16, 17 and 18 not labeled with the words "used oil" (Appendix 1, Photos 3 & 4)
- Storage of drum containing waste MEK since 11/2019 (Appendix 1, Photo 9 & 10).
- No labeling on MEK waste drum (Appendix 1, Photo 9 & 10).

On 03/29/2019, the closing meeting discussed JES operations observed. Mr. January, Jr. was provided with a handwritten list of documents requested for EPA review (Appendix 3).

Section IV – FOLLOW UP

On 04/01/2019, Mr. January Sr. was emailed a typed list of documents requested during the inspection. On 04/02/2019, Mr. January Sr. was emailed copies of the photographs taken during the inspection.

Section V – LIST OF APPENDICES

Appendix 1 – Photo-documentation Log

Appendix 2 – Table of 2017 Concerns and 2019 Ongoing Concerns

Appendix 3 – Document Request List

Appendix 1

Photograph Log



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 1

Location:	January Environmental Services				☐ Image Modified	
City:	Oklahoma City				State:	OK
Filename:	P3280001.JPG		Photo Date:	03/28/2019	Time:	13:06
Photographer:	Bill Mansfield					
Latitude:	N/A		Longitude:	N/A		
Description:	CLOR-D-TECT kits with expiration date of April '99					





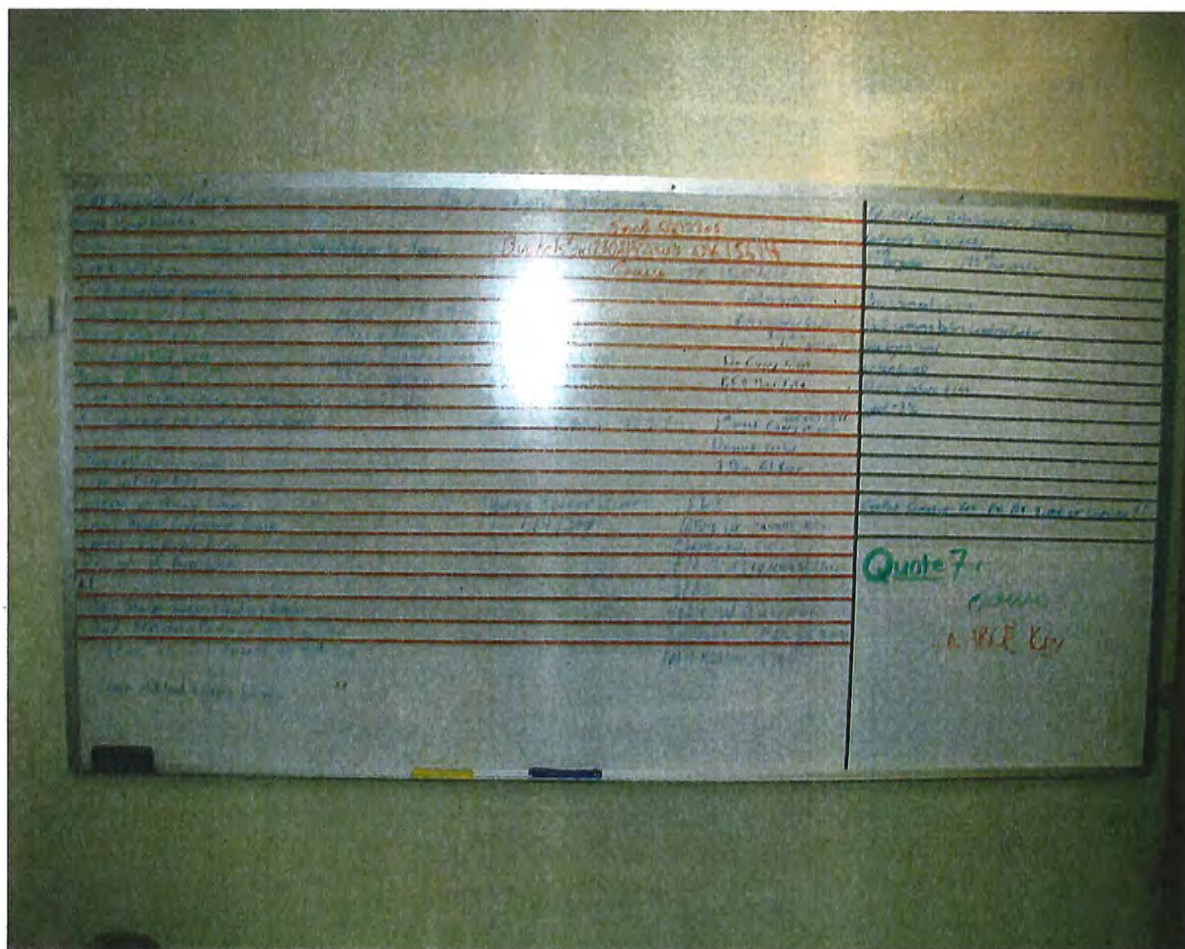
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Appendix 1

Photograph Log

Photo No. 2

Location:	January Environmental Services				☐ Image Modified	
City:	Oklahoma City				State:	OK
Filename:	P3280002.JPG		Photo Date:	03/28/2019	Time:	13:10
Photographer:	Bill Mansfield					
Latitude:	N/A		Longitude:	N/A		
Description:	Office work board					



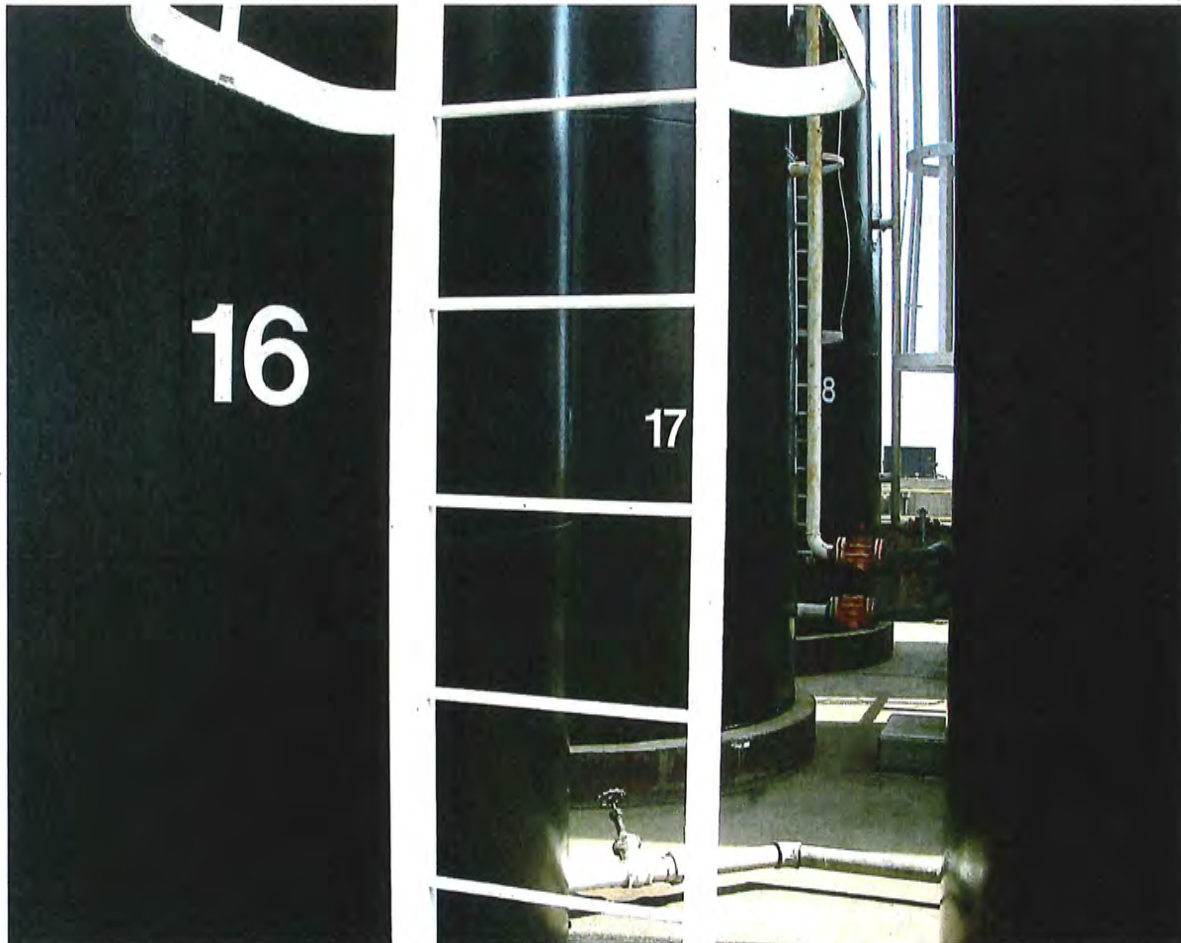


UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Photograph Log

Appendix 1

Photo No. 3

Location:	January Environmental Services				☐ Image Modified	
City:	Oklahoma City				State:	OK
Filename:	P3280003.JPG	Photo Date:	03/28/2019	Time:	13:18	
Photographer:	Bill Mansfield					
Latitude:	N/A		Longitude:	N/A		
Description:	Used oil tanks 16, 17, and 18 showing no used oil labels					





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Photograph Log

Appendix 1

Photo No. 4

Location:	January Environmental Services			☐ Image Modified	
City:	Oklahoma City			State:	OK
Filename:	P3280004.JPG	Photo Date:	03/28/2019	Time:	13:24
Photographer:	Bill Mansfield				
Latitude:	N/A	Longitude:	N/A		
Description:	Tank number 2 showing no used oil label				





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Appendix 1

Photograph Log

Photo No. 5

Location:	January Environmental Services				☐ Image Modified	
City:	Oklahoma City				State:	OK
Filename:	P3280005.JPG		Photo Date:	03/28/2019	Time:	13:50
Photographer:	Bill Mansfield					
Latitude:	N/A		Longitude:	N/A		
Description:	Tote in warehouse labeled used oil					





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Photograph Log

Appendix 1

Photo No. 6

Location:	January Environmental Services			☐ Image Modified	
City:	Oklahoma City			State:	OK
Filename:	P3280006.JPG	Photo Date:	03/28/2019	Time:	13:54
Photographer:	Bill Mansfield				
Latitude:	N/A	Longitude:	N/A		
Description:	Unlabeled drum in warehouse, Cris January Jr. said it was used oil.				





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 7

Location:	January Environmental Services				☐ Image Modified	
City:	Oklahoma City				State:	OK
Filename:	P3280007.JPG	Photo Date:	03/28/2019	Time:	13:56	
Photographer:	Bill Mansfield					
Latitude:	N/A		Longitude:	N/A		
Description:	Pump in warehouse					





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Appendix 1

Photograph Log

Photo No. 8

Location:	January Environmental Services			☐ Image Modified	
City:	Oklahoma City			State:	OK
Filename:	P3280008.JPG	Photo Date:	03/28/2019	Time:	13:57
Photographer:	Bill Mansfield				
Latitude:	N/A	Longitude:	N/A		
Description:	Inside of truck trailer at loading dock. Cris January Jr. said the totes are headed to a landfill.				





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 9

Location:	January Environmental Services				☐ Image Modified	
City:	Oklahoma City				State:	OK
Filename:	P3280009.JPG		Photo Date:	03/28/2019	Time:	14:08
Photographer:	Bill Mansfield					
Latitude:	N/A		Longitude:	N/A		
Description:	Drum in warehouse with EPA marking from previous inspection sampled by EPA in 2017					





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Photograph Log

Appendix 1

Photo No. 10

Location:	January Environmental Services			☐ Image Modified	
City:	Oklahoma City			State:	OK
Filename:	P3280010.JPG	Photo Date:	03/28/2019	Time:	14:11
Photographer:	Bill Mansfield				
Latitude:	N/A	Longitude:	N/A		
Description:	Overview of drums in the warehouse. Cris January Jr. said they were quarantined from the previous EPA inspection in 2017.				





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 11

Location:	January Environmental Services				☐ Image Modified	
City:	Oklahoma City				State:	OK
Filename:	P3280011.JPG		Photo Date:	03/28/2019	Time:	14:20
Photographer:	Bill Mansfield					
Latitude:	N/A		Longitude:	N/A		
Description:	Large metal containers (7 yards) with compressor filters					





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 12

Location:	January Environmental Services				☐ Image Modified
City:	Oklahoma City		State:	OK	
Filename:	P3280012.JPG	Photo Date:	03/28/2019	Time:	14:20
Photographer:	Bill Mansfield				
Latitude:	N/A	Longitude:	N/A		
Description:	Large metal container (7 yards) with compressor filters. PID reading of 1.8 ppm				





Photograph Log

Photo No. 13

Location:	January Environmental Services				☐ Image Modified	
City:	Oklahoma City				State:	OK
Filename:	P3280013.JPG		Photo Date:	03/28/2019	Time:	14:26
Photographer:	Bill Mansfield					
Latitude:	N/A		Longitude:	N/A		
Description:	Drum in warehouse labeled Non-hazardous waste solvent					





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 14

Location:	January Environmental Services				☐ Image Modified	
City:	Oklahoma City				State:	OK
Filename:	P3280014.JPG		Photo Date:	03/28/2019	Time:	14:30
Photographer:	Bill Mansfield					
Latitude:	N/A		Longitude:	N/A		
Description:	Metal container with a heater and fuel. The container was leaking.					





Photograph Log

Photo No. 15

Location:	January Environmental Services				☐ Image Modified	
City:	Oklahoma City				State:	OK
Filename:	P3280015.JPG	Photo Date:	03/28/2019	Time:	14:34	
Photographer:	Bill Mansfield					
Latitude:	N/A	Longitude:	N/A			
Description:	Drums of product in ER Building. Cris January Jr. said they are trying to find a buyer.					





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Photograph Log

Appendix 1

Photo No. 16

Location:	January Environmental Services				☐ Image Modified	
City:	Oklahoma City				State:	OK
Filename:	P3280016.JPG		Photo Date:	03/28/2019	Time:	14:37
Photographer:	Bill Mansfield					
Latitude:	N/A		Longitude:	N/A		
Description:	Drums in ER Building. Cris January did not know what they were used for at the time.					





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 17

Location:	January Environmental Services				☐ Image Modified	
City:	Oklahoma City				State:	OK
Filename:	P3280017.JPG		Photo Date:	03/28/2019	Time:	14:42
Photographer:	Bill Mansfield					
Latitude:	N/A		Longitude:	N/A		
Description:	Overview of used oil filter containers (bins)					



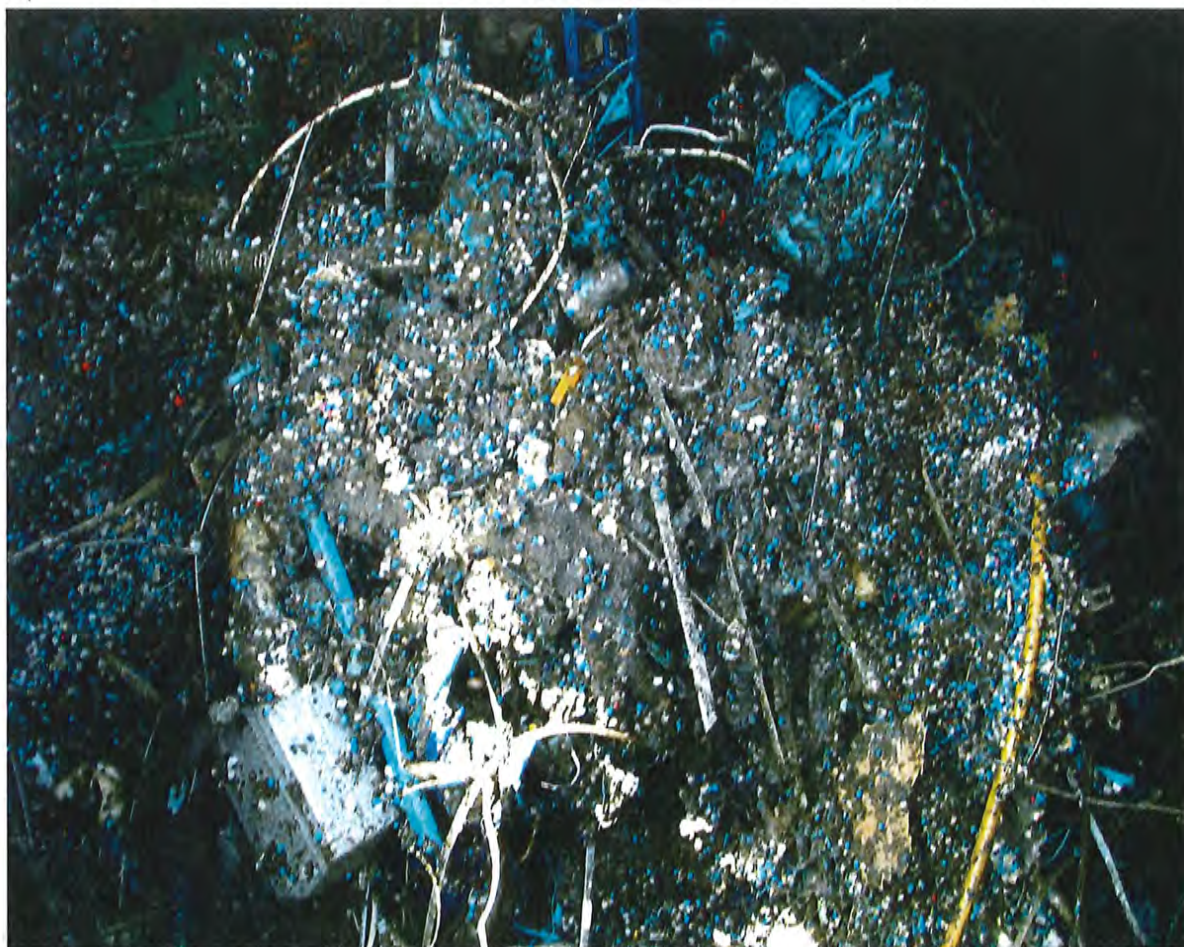


UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 18

Location:	January Environmental Services				☐ Image Modified	
City:	Oklahoma City				State:	OK
Filename:	P3280018.JPG		Photo Date:	03/29/2019	Time:	14:47
Photographer:	Bill Mansfield					
Latitude:	N/A		Longitude:	N/A		
Description:	Contents of one of the used oil filter containers					





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 19

Location:	January Environmental Services				☐ Image Modified	
City:	Oklahoma City				State:	OK
Filename:	P3280019.JPG	Photo Date:	03/29/2019	Time:	14:53	
Photographer:	Bill Mansfield					
Latitude:	N/A	Longitude:	N/A			
Description:	Roll off box R25007 with used filters and other wastes. PID reading 15 ppm.					





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Photograph Log

Appendix 1

Photo No. 20

Location:	January Environmental Services				☐ Image Modified	
City:	Oklahoma City				State:	OK
Filename:	P3280020.JPG	Photo Date:		03/29/2019	Time:	14:54
Photographer:	Bill Mansfield					
Latitude:	N/A		Longitude:	N/A		
Description:	Close-up inside roll off box R25007					





Photograph Log

Photo No. 21

Location:	January Environmental Services				☐ Image Modified	
City:	Oklahoma City				State:	OK
Filename:	P3280021.JPG		Photo Date:	03/29/2019	Time:	15:03
Photographer:	Bill Mansfield					
Latitude:	N/A		Longitude:	N/A		
Description:	Used oil filter container behind ER/Maintenance Building. No curbing on concrete pad.					





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Photograph Log

Appendix 1

Photo No. 22

Location:	January Environmental Services				☐ Image Modified	
City:	Oklahoma City				State:	OK
Filename:	P3280022.JPG	Photo Date:	03/29/2019	Time:	15:03	
Photographer:	Bill Mansfield					
Latitude:	N/A	Longitude:	N/A			
Description:	Contents of used oil filter container in picture 21					





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 23

Location:	January Environmental Services				☐ Image Modified	
City:	Oklahoma City				State:	OK
Filename:	P3280023.JPG	Photo Date:	03/28/2019	Time:	15:06	
Photographer:	Bill Mansfield					
Latitude:	N/A	Longitude:	N/A			
Description:	Trailer onsite that was ready to offload					





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 24

Location:	January Environmental Services				☐ Image Modified	
City:	Oklahoma City				State:	OK
Filename:	P3290024.JPG	Photo Date:	03/28/2019	Time:	10:02	
Photographer:	Bill Mansfield					
Latitude:	N/A	Longitude:	N/A			
Description:	Contents of used oil filter bin showing a mix of fuel and oil filters and other wastes					





Photograph Log

Photo No. 25

Location:	January Environmental Services				☐ Image Modified	
City:	Oklahoma City				State:	OK
Filename:	P3290025.JPG		Photo Date:	03/28/2019	Time:	10:03
Photographer:	Bill Mansfield					
Latitude:	N/A		Longitude:	N/A		
Description:	Contents of used oil filter bin showing a mix of fuel and oil filters and other wastes					





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 26

Location:	January Environmental Services				☐ Image Modified	
City:	Oklahoma City				State:	OK
Filename:	P3290026.JPG	Photo Date:	03/29/2019	Time:	10:08	
Photographer:	Bill Mansfield					
Latitude:	N/A	Longitude:	N/A			
Description:	Used oil filter bins unloaded from the trailer in picture 23. Located on the east side of the ER/Maintenance Building.					





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Appendix 1

Photograph Log

Photo No. 27

Location:	January Environmental Services				☐ Image Modified	
City:	Oklahoma City				State:	OK
Filename:	P3290027.JPG	Photo Date:	03/28/2019	Time:	10:10	
Photographer:	Bill Mansfield					
Latitude:	N/A	Longitude:	N/A			
Description:	Tote that was labeled new solvent, now labeled as Burner Fuel					





Photograph Log

Photo No. 28

Location:	January Environmental Services				☐ Image Modified	
City:	Oklahoma City				State:	OK
Filename:	P3290028.JPG		Photo Date:	03/28/2019	Time:	10:10
Photographer:	Bill Mansfield					
Latitude:	N/A		Longitude:	N/A		
Description:	Drum also in photo 13 with non-hazardous waste label removed. Cris January Jr. says it is leftover virgin solvent that used to be in the tote in photo 27.					





Photograph Log

Photo No. 29

Location:	January Environmental Services				☐ Image Modified	
City:	Oklahoma City				State:	OK
Filename:	P3290029.JPG		Photo Date:	03/28/2019	Time:	11:59
Photographer:	Bill Mansfield					
Latitude:	N/A		Longitude:	N/A		
Description:	JES vacuum truck getting ready to unload					





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Photograph Log

Photo No. 30

Location:	January Environmental Services				☐ Image Modified	
City:	Oklahoma City				State:	OK
Filename:	P3290030.JPG		Photo Date:	03/29/2019	Time:	12:00
Photographer:	Bill Mansfield					
Latitude:	N/A		Longitude:	N/A		
Description:	JES employee opening hatches on top of truck					





Photograph Log

Photo No. 31

Location:	January Environmental Services				☐ Image Modified	
City:	Oklahoma City				State:	OK
Filename:	P3290031.JPG		Photo Date:	03/29/2019	Time:	12:00
Photographer:	Bill Mansfield					
Latitude:	N/A		Longitude:	N/A		
Description:	JES employee taking a reading with a "sniffer"					





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Appendix 1

Photograph Log

Photo No. 32

Location:	January Environmental Services				☐ Image Modified	
City:	Oklahoma City				State:	OK
Filename:	P3290032.JPG		Photo Date:	03/29/2019	Time:	12:00
Photographer:	Bill Mansfield					
Latitude:	N/A		Longitude:	N/A		
Description:	JES employee holding the sniffer after taking a reading					





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Appendix 1

Photograph Log

Photo No. 33

Location:	January Environmental Services				☐ Image Modified	
City:	Oklahoma City				State:	OK
Filename:	P3290033.JPG	Photo Date:	03/29/2019	Time:	12:02	
Photographer:	Bill Mansfield					
Latitude:	N/A	Longitude:	N/A			
Description:	JES employee pulling a sample of the truck's contents					





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 34

Location:	January Environmental Services				☐ Image Modified	
City:	Oklahoma City				State:	OK
Filename:	P3290034.JPG	Photo Date:	03/29/2019	Time:	12:04	
Photographer:	Bill Mansfield					
Latitude:	N/A	Longitude:	N/A			
Description:	JES employee taking a gravity measurement					



APPENDIX 2

Appendix 2
Comparison of
Concerns in 2017 and 2019

Regulation	Concerns in 2017	Concerns March 28-29, 2019
Used Oil Transporter Part 279, Subpart E		
279.44 (a)(b)&(c) - transporter must determine total halogen content < or > 1,00ppm. Via testing or knowledge.	<i>Using unapproved method "sniffer". JES indicated use of Clor-D-tect but no records and contradicting statements of use.</i>	EPA inspectors observed JES employees use a "sniffer" during the unloading of used oil collected that morning from local customers. Clor-D-tects were not used.
Used Oil Processor Part 279, Subpart F		
279.52 (a)(5) aisle space	<i>Aisle space non existent around totes and drums</i>	Aisle space was not maintained around drums stored in the warehouse or for the used oil filter bins stored outside behind the warehouse.
279.52(a)(6) operator must attempt to make arrangements with emergency response teams	<i>No documentation regarding arrangements with local response agencies in SPCC or other</i>	SPCC Plan/Contingency Plan requested. Pending review.
279.52(b) Contingency Plan; incorporate into SPCC plan: arrangements with response personnel; name, address and phone of all persons qualified to act as emergency coordinator; keep list up to date; evaluation plan; list of emergency equipment; copy of plan maintained at facility. Revise plan when facility changes design, construction, operation or maintenance etc. that changes potential for fire release or the response necessary in an emergency.	<i>SPCC plan does not include response to fire or explosion at the JES facility. 279.52(b)(2)(i). Lacks description of arrangements made with local police, fire, hospitals etc. to coordinate emergency services. 279.52(b)(2)(iii) Does not list address (home and office) and phone (home) of emergency coordinator. 279.52(b)(2)(iv) Does not include an evacuation plan for personnel. 279.52(b)(2)(vi) Has not been updated to reflect the change in design at the facility. Tank #13 had been removed from the facility sometime after 6/20/2017, and rail tank now used for storage, 279.52(b)(4)iii</i>	SPCC Plan/Contingency Plan requested. Pending review.

Appendix 2
Comparison of
Concerns in 2017 and 2019

Regulation	Concerns in 2017	Concerns March 28-29, 2019
279.53 - processor must determine total halogen content of used oil managed at facility is below 1,000 ppm	<i>Using unapproved method "sniffer". JES indicated use of Clor-D-tect but no records and contradicting statements of use.</i>	EPA inspectors observed JES employees use a "sniffer" during the unloading of used oil collected that morning from customers. Clor-D-tects were not used.
279.54(b) Condition of units. (containers/tanks) in good conditions and not leaking (no visible leaks).	<i>Dumpster in warehouse was leaking.</i>	Leaking bin observed in warehouse containing a heater unit.
279.54(c) Secondary containment for containers storing or processing used oil	<i>Areas without Sec. Containment: Rail car - stored longer than 35 days requires secondary containment. Roll off R25036/ C25276D with liquid not on pad.</i>	Rail car no longer at facility. Roll offs still on pad without curbing. Behind the ER/Maintenance building, bins for used oil filters were on a pad without curbing, directly adjacent to ground.
279.54 (f)(1) containers/tanks used to store used oil must be labeled	<i>No Labels on: Tanks: 2, 16, 17, 18 and 22 Rail Car Roll offs Dumpsters</i>	Tanks 2, 16, 17 and 18 not labeled used oil. Two 7-yard bins in the warehouse managing used filters not labeled used oil. Frac tanks not labeled used oil.
279.55 Must develop and follow a written waste analysis plan describing procedures to be used to comply with the rebuttal presumption/ Keep onsite.	<i>Written plan provided in 2012 was not adequate. Lacking : specific sample methods used to obtain a representative sample; specify methods to analyze the used oil for parameters specified in 279.53, or frequency. No documentation provided to substantiate generator knowledge.</i>	Not reviewed this inspection.
279.57(a)(2)(i) - keep operating record at facility	<i>JES did not maintain an operating records at the facility</i>	Not reviewed

**Appendix 2
Comparison of
Concerns in 2017 and 2019**

Regulation	Concerns in 2017	Concerns March 28-29, 2019
279.57(b) - must report to Regional Admin biennially info on used oi activities	<i>JES did not submit BRS for 2012, 2014 or 2016.</i>	Document requested for 2018.
Hazardous Waste Transporter Part 263		
A transporter of hazardous waste must deliver collected hazardous waste to the authorized facility that is identified on the hazardous waste manifest. 40 C.F.R. § 263.21.	<i>JES was holding hazardous waste (drum of MEK) in their warehouse for 18 days, beyond the 10 days allowed.</i>	Copies of manifests requested. Waste MEK identified in November 2017 was still being stored at JES.
263.20(a)1, (b) & (c) - manifests required to ship haz waste	<i>EPA manifests (form 8700-22) were not used to transport haz waste to JES. MEK from Pioneer Wireline.</i>	Copies of manifests requested. Waste MEK identified in November 2017 was still being stored at JES.
Generator Part 262		
262.11 Waste Determination	<i>Used oil filters not properly drained or crushed and may not meet scrap metal recycling exemption. JES does not characterize rolloff where filters are managed with other wastes.</i>	Roll offs were observed to contain a variety of filter types without being crushed. Roll offs were mixed with wastes such as: cardboard; rags; spill pads; fuel, water and oil filters; sealed garbage bags, and soil. ODEQ documents show waste in roll-offs characterized by JES as used oil filters drained and crushed.

Appendix 2
Comparison of
Concerns in 2017 and 2019

Regulation	Concerns in 2017	Concerns March 28-29, 2019
Treatment, Storage and Disposal Facility Part 270		
Part 270.1 - operating as a non-permitted TSD by storing over 10 days	Storing transported haz waste in excess of 10 days (up to 41 days during ODEQ; 18 days during EPA) .	EPA observed drums in the warehouse near the back loading door. Cris January Jr. said the drums are those EPA had concerns with during the 2017 EPA inspection. One drum was the drum of MEK that EPA sampled in 2017 and determined it contained waste MEK at 58,000ppm. This drum has been stored onsite since November 2017. The drum was not labeled. EPA observed a drum labeled non-hazardous waste and the word "solvent" written on the label. EPA requested documentation related to drums located in area.

APPENDIX 3
DOCUMENTS REQUESTED



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6

1445 ROSS AVENUE, SUITE 1200

DALLAS, TX 75202-2733

Documents Requested by EPA March 28 – 29, 2019

	Document Type/Name/Requested Information
1	Contingency Plan/SPCC Plan
2	Emergency Procedures and documentation of arrangements with responders
3	Waste Analysis Plan
4	If shipping on-spec oil provide copies of analyses
6	2018 Biennial Report for Used Oil – submitted to State/EPA.
7	Hazardous waste manifests since October 2018. Start with most current.
8	JES manifests/trip tickets from October 2018. Provide most recent first – starting with the waste onsite during the inspection.
9	Waste profiles for Red Cliff Midstream carbon and other wastes received.
10	Waste profiles for Schlumberger totes and other waste onsite during the inspection.
11	Waste profile for compressor filters, identified in the 7- yard bins, draining in the warehouse.
12	Waste profile and trip ticket for load on the flatbed delivered to the facility on 3/28/2019. This includes the used oil containers and drums labeled from KLX.
13	Description of the new process system being installed.

DRAFT - DELIBERATIVE – FOR INTERNAL REVIEW

	Document Type/Name/Requested Information
14	Waste profile of material identified in used oil containers behind warehouse that appear to be soil, and one with the debris that looked like blue and white bits of plastic.
15	Documentation showing when the rail car of used oil was emptied and when the rail car was removed from the site.
16	JES manifests/trip tickets and waste profile for drums labeled triethanolamine 99% located in the ER building
17	Trip ticket and waste profile of used oil filter bin containing sock filters located behind the warehouse.
18	Purchase order of solvent purchased by JES, of which the remaining of was observed in the 30-gal drum in the warehouse. And the ticket showing the customer who bought a 55-gal drum of the solvent.
19	Large, 7-yard bin, at back of a row of used oil filter bins behind the warehouse containing soil. Provide waste profile and trip ticket.
20	Trip tickets and waste profiles for used oil picked up on 3/29/2019 and observed while unloading at JES.

Waste profile also means waste characterization.

Note: There were several questions on the original list that were duplicates. In this list the duplicates have been combined to form one request or removed. In addition, questions that were lined through during the inspection (items not requested) were removed from this list.