

Region 6 - Enforcement & Compliance Assurance Division
INSPECTION REPORT

Inspection Date(s):	06/07/2022	
Media Program:	Water	
Regulatory Program(s)	Clean Water Act – National Pollution Discharge Elimination System (Brine)	
Company Name:	WWW Oil Company	
Facility Name:	Whitetail Stuart Lease	
Facility Physical Location:	Latitude: 36.785175, Longitude: -96.268139	
(city, state, zip code)	Pawhuska, Oklahoma, 74056	
Mailing address:	PO BOX 1138	
(city, state, zip code)	Pawhuska, Oklahoma, 74056	
County/Parish:	Osage County	
Facility Phone Number	(702) 303-7954	
Facility Contact:	Michael Wachtman	Owner/Operator
	mawlasvegas@aol.com	
FRS Number:	n/a	
Identification/Permit Number:	OKU000872	
Media Identifier Number:	n/a	
NAICS:	211111	
SIC:	1311	
Personnel participating in inspection:		
Matthew Allen	EPA, Region 6ECDW	Inspector
Carl Wills	EPA, Region 6EDCWA	Inspector
EPA Lead Inspector Signature/Date		
	Matthew Allen	Date
Supervisor Signature/Date		
	Anthony Loston (<i>acting</i>)	Date

Section I – INTRODUCTION

PURPOSE OF THE INSPECTION

EPA Region 6 inspectors Matthew Allen and Carl Wills arrived at the WWW Oil Company, Whitetail Stuart Lease (EPA ID No. OKU000872), at 2:10 PM on 06/07/2022 for an unannounced inspection. There was no company representative present at the time of the inspection. The inspection was a follow-up inspection to the initial EPA inspection that was conducted by EPA Inspector Kent Sanborn on 08/02/2018, when the facility was owned by Wachtman-Schroeder, and produced unsatisfactory results. Additional follow-up inspections resulting in unsatisfactory and/or marginal results were conducted by Kent Sanborn on 08/07/2018, 08/13/2018, 10/22/2018, 12/18/2018, 12/10/2019 and 03/31/2021. This inspection was conducted by the authority of the Clean Water Act to determine compliance with Environmental Protection Agency (EPA) regulations. There was no other Federal, State or Local agency present at the time of the inspection.

FACILITY DESCRIPTION

EPA conducted a follow-up inspection on the WWW Oil Company, LLC, Whitetail Stuart Lease. The spill originated from a saltwater disposal facility where a storage tank and injection well were located, fluids spilled from the facility and flowed to the east into a nearby tributary. The Whitetail Stuart Lease was located northeast of Pawhuska, Oklahoma, approximately 3.25 miles NNE from the intersection of US Highway 60 and State Highway 99, in Osage County, Oklahoma.

Section II - OBSERVATIONS

During the inspection I observed evidence of a recent spill or a failure to clean up the pit area after a spill event. I observed oil floating on the water in the pit and heavy oil staining on the gravel berm around the pit, this can be seen in photo No. 2 of Appendix 1 (photo log) which is attached to this report. I observed the flow path beginning at the release point continuing east toward the impacted tributary. The flow path was estimated by inspectors Matthew Allen and Carl Wills, to be approximately 85 percent recovered with vegetation. The condition of the flow path can be seen in photos No. 3, 4, 5, 6 and 7. I observed no vegetation and significant soil erosion along the final 20 feet of the flow path as it connected to the Point of Entry (POE) into the main channel of the impacted tributary, evidence of this erosion can be seen in photos No. 6 and 7. Approximately 25 feet downstream from the POE, I observed the remaining portion of an earth dam which was placed across the impacted tributary with a piece of PVC pipe partially buried in the dam. With a properly calibrated YSI Pro 30 conductivity meter, I observed an elevated Total Dissolved Solids (TDS) field reading of 2,144 mg/L. The elevated TDS field reading, and the absence of vegetation suggested the area of soil erosion near the end of the flow path was contaminated with brine and continued to discharge into the tributary during and after rainfall events.

Section III – AREAS OF CONCERN

EPA Region 6 inspector observed an elevated level of TDS in the main channel of the impacted tributary, likely due to brine being released from the area of soil erosion at and immediately adjacent the POE into the tributary. The primary area of concern at the time of the inspection was to remove the brine from the area of eroding soil to prevent further discharge of contaminated water into the impacted tributary. The area of erosion should be restored to prevent additional erosion of the west bank of the tributary.

Section IV – FOLLOW UP

No additional information was received by EPA after exiting the Facility on 06/07/2022.

Section V – LIST OF APPENDICES

Appendix 1 – Photo Log – 10 photos taken 06/07/2022

Appendix 1

Photograph Log 10 Photos



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 1

Location: 36.785175, -96.268139		
City: Pawhuska	County/Parish: Osage	State: Oklahoma



Photo File Name: RIMG0025

Orientation: S

Date of Photo: 06/07/2022

Time of Photo: 2:16 PM

Latitude: 36.785175

Longitude: -96.268139

Photographer: Carl Wills

Description: This was the sign located at the facility which served as the Release Point for the spill.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 2

Location: 36.785175, -96.268139		
City: Pawhuska	County/Parish: Osage	State: Oklahoma



Photo File Name: RIMG0026

Orientation: SE

Date of Photo: 06/07/2022

Time of Photo: 2:18 PM

Latitude: 36.785175

Longitude: -96.268139

Photographer: Carl Wills

Description: This was a pit located at the release point of the spill. At the time of the inspection, crude oil was present on the pit and crude oil stains were present on the berm around the pit, indicating a recent spill or a failure to cleanup after a spill event.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 3

Location: 36.785175, -96.268139		
City: Pawhuska	County/Parish: Osage	State: Oklahoma



Photo File Name: RIMG0027

Orientation: E

Date of Photo: 06/07/2022

Time of Photo: 2:20 PM

Latitude: 36.785175

Longitude: -96.268139

Photographer: Carl Wills

Description: This was a photo taken at the release point facility, standing at the East end of the facility, with a view looking East down the flowpath of the spill toward the Point of Entry (POE). I estimated the flowpath had recovered with vegetation to approximately 85 percent.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 4

Location: 36.785175, -96.268139		
City: Pawhuska	County/Parish: Osage	State: Oklahoma



Photo File Name: RIMG0028

Orientation: E

Date of Photo: 06/07/2022

Time of Photo: 2:22 PM

Latitude: 36.784975 Estimated

Longitude: -96.2677 Estimated

Photographer: Carl Wills

Description: This was a portion of the flowpath where sod strips were applied but failed to survive. The sod strips had successfully prevented the soil from eroding from the site.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 5

Location: 36.785175, -96.268139		
City: Pawhuska	County/Parish: Osage	State: Oklahoma



Photo File Name: RIMG0029

Orientation: W

Date of Photo: 06/07/2022

Time of Photo: 2:25 PM

Latitude: 36.784808 Estimated

Longitude: -96.2673 Estimated

Photographer: Carl Wills

Description: This was a photo of the flowpath, standing near the POE into the impacted tributary with a view looking west toward the Release Point (silver tank).



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 6

Location: 36.785175, -96.268139		
City: Pawhuska	County/Parish: Osage	State: Oklahoma



Photo File Name: RIMG0030

Orientation: E

Date of Photo: 06/07/2022

Time of Photo: 2:25 PM

Latitude: 36.784808

Longitude: -96.2673

Photographer: Carl Wills

Description: This was a photo taken approximately 20 feet before the spill/flowpath entered the impacted tributary, looking west to the POE. The bank of the tributary has eroded in the absence of vegetation.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 7

Location: 36.785175, -96.268139		
City: Pawhuska	County/Parish: Osage	State: Oklahoma



Photo File Name: RIMG0031

Orientation: SE

Date of Photo: 06/07/2022

Time of Photo: 2:25 PM

Latitude: 36.784808

Longitude: -96.2673

Photographer: Carl Wills

Description: This was a photo taken approximately 20 feet west from the POE, looking southeast, showing the significant soil erosion of the bank along the impacted tributary.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 8

Location: 36.785175, -96.268139		
City: Pawhuska	County/Parish: Osage	State: Oklahoma



Photo File Name: RIMG0032

Orientation: SE

Date of Photo: 06/07/2022

Time of Photo: 2:26 PM

Latitude: 36.784747 Estimated

Longitude: -96.267292 Estimated

Photographer: Carl Wills

Description: This was a photo of a piece of PVC pipe installed in the remaining portion of an earth dam. This dam and pipe were located approximately 25 feet downstream from the POE on the impacted tributary.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 9

Location: 36.785175, -96.268139		
City: Pawhuska	County/Parish: Osage	State: Oklahoma



Photo File Name: RIMG0033

Orientation: n/a

Date of Photo: 06/07/2022

Time of Photo: 2:23

Latitude: 36.784753 Estimated

Longitude: -96.267231 Estimated

Photographer: Carl Wills

Description: This was an elevated Total Dissolved Solids (TDS) field reading of 2,144 mg/L taken approximately 40 feet downstream in the main channel of the impacted tributary.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 10

Location: 36.785175, -96.268139		
City: Pawhuska	County/Parish: Osage	State: Oklahoma



Photo File Name: RIMG0034

Orientation: E

Date of Photo: 06/07/2022

Time of Photo: 2:35 PM

Latitude: 36.784753 Estimated

Longitude: -96.267231 Estimated

Photographer: Carl Wills

Description: This was the pool of water in the main channel of the impacted tributary where the elevated TDS field reading of 2,144 mg/L was taken.