

Region 6 - Enforcement & Compliance Assurance Division
INSPECTION REPORT

Inspection Date(s):	07/16/2024	
Media Program:	Water (CWA)	
Regulatory Program(s)	Water (CWA) Brine Program (Oil & Gas inspection)	
Company Name:	MidAmerica Environmental Holdings, LLC	
Facility Name:	USA Disposal – El Dorado	
Facility Physical Location:	101 Warehouse Drive	
(city, state, zip code)	El Dorado, AR 71730	
Mailing address:	4101 Old Oak Drive	
(city, state, zip code)	Little Rock, AR 72212	
County/Parish:	Union County	
Facility Phone Number	850-525-8830	
Facility Contact:	William L. White (850-525-8830)	Principal / CEO
	bwhite@apollowater.tech ; bwhite@midamerica.holdings	
FRS Number:	N/A	
Identification/Permit Number:	ARU002251; ADEQ permit 5077-WR-7 (administratively extended) for AFIN 70-01210	
Media Identifier Number:	N/A	
NAICS:	213112	
SIC:	1389	
Personnel participating in inspection:		
Kerri McCabe (lead)	EPA / Region 6 ECDW	Inspector / Enforcement Officer
Michael Blaha	EPA / Region 6 ECDW	Inspector / Enforcement Officer
Michael Young	ADEQ / Office of Water Quality	Inspector Supervisor
Kirk Brown	Trekker Energy Services	Director of Operations
EPA Lead Inspector Signature/Date		
	Kerri McCabe	Date
Supervisor Signature/Date		
	Jeanne Eckhart	Date

Section I – INTRODUCTION

PURPOSE OF THE INSPECTION

EPA Region 6 inspectors Kerri McCabe (lead) and Michael Blaha arrived at MidAmerica Environmental Holdings, LLC / USA Disposal (El Dorado) facility, located at 101 Warehouse Drive, El Dorado, Arkansas, 71730 at 33.204359, -92.613940; at 0845 on 07/16/2024 for an announced inspection. Mr. Kirk Brown, Trekker Energy Services, was present at the time of the inspection. The inspection was conducted by the authority of the Clean Water Act (CWA) to determine compliance with Environmental Protection Agency (EPA) regulations. Mr. Michael Young with Arkansas Department of Energy and Environment – Division of Environmental Quality – Office of Water Quality – Compliance Branch (hereafter “ADEQ”), was present at the time of the inspection. The facility was last inspected on 05/22/2024 by Inspector Kerri McCabe.

FACILITY DESCRIPTION

EPA conducted an inspection on the MidAmerica Environmental Holdings, LLC / USA Disposal (El Dorado) facility, which is a drilling mud bulking facility for oil-based and water-based drilling fluids, Exploration and Production (E&P) wastes, and additional liquid wastes listed in the State No-Discharge (SND) permit issued by the State of Arkansas. There are five (5) concrete holding pits, ± 23 frac tanks, one (1) storage building for bulking material (sawdust), one (1) concrete slab for stockpiling bulked material (sawdust blended with liquid wastes), one (1) stormwater pond, and several outbuildings used as storage and office space. Approximately 6.5 acres of the active property have been used for land filling and land application of bulked material. The facility was formally a mining site and borrow pit for clay soil.



Map 1. Aerial imagery (Google Earth dated 05/14/2023) of the MidAmerica Environmental Holdings, LLC – USA Disposal (El Dorado) facility.

Section II - OBSERVATIONS

I observed the signage and overviews of areas from the four main directions of the facility, see Appendix 1 (Photograph Log), Photo No. 1 through No. 5. For additional GPS location and photo metadata, see Appendix 1.

I observed the concrete pits used for mixing liquid wastes with sawdust, see Photo No. 6 and No. 7.

I observed frac tanks with liquid wastes, the bulked material staging area (partially covered), and the concrete pits used for collecting and storing leachate from the bulked material, see Photo No. 8 through No. 11.

I observed areas on the property, which contained jurisdictional wetlands, with soil disturbing activities, scattered or stacked bulked material, bulked material leachate and staining, and dead vegetation; see Photo No. 12 through No. 19.

I observed the stormwater pond and associated drainpipes (permitted by the state under an Industrial Stormwater General Permit, IGP), an additional pipe from an unknown source, and the receiving stream; see Photo No. 20 through No. 26.

I observed the former wastewater treatment area and associated drainage path to the stormwater pond, a concrete pit for liquid waste storage, and areas used for equipment/outbuilding storage; see Photo No. 27 through No. 29.

Section III – AREAS OF CONCERN

A closing conference was held with Mr. Kirk Brown of Trekker Energy Services during the inspection. The closing conference focused on the current conditions of the areas of concern previously identified in the 05/22/2024 inspection, the placement of fill in/near wetlands, and the actively leaking pipe (source unknown) at the stormwater pond and receiving stream. Areas of concern at the time of the inspection include the following:

- Uncovered bulked material at the storage area,
- Loose sawdust throughout the facility production area,
- Numerous frac tanks with contents not identified,
- Concrete mixing pits without adequate freeboard and damaged concrete berms,
- Soil disturbing activities, scattered/stacked bulked material, bulked material leachate and staining, and dead vegetation within or near wetlands,
- Lower drainpipe for the stormwater pond cannot be inspected, and
- An actively dripping pipe, of an unknown source, crossing the receiving stream at the stormwater pond.

Section IV – FOLLOW UP

Inspector will conduct follow-up phone calls with the company representative(s) over the coming weeks and months to ensure areas of concern are properly addressed.

Section V – LIST OF APPENDICES

Appendix 1 – Photograph Log – 29 photos taken 07/16/2024.

Appendix 1

Photograph Log 29 Photos



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 1

Location: MidAmerica Environmental Holdings, LLC / USA Disposal (El Dorado) facility, located at 101 Warehouse Drive at 33.204359, -92.613940		
City: El Dorado	County/Parish: Union County	State: Arkansas



Photo File Name: 100-0223

Orientation: SSW

Date of Photo: 07/16/2024

Time of Photo: 0912

Latitude: 33.204250

Longitude: -92.614150

Photographer: Kerri McCabe

Description: Looking SSW, signage at the USA Disposal facility.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 2

Location: MidAmerica Environmental Holdings, LLC / USA Disposal (El Dorado) facility, located at 101 Warehouse Drive at 33.204359, -92.613940		
City: El Dorado	County/Parish: Union County	State: Arkansas



Photo File Name: 100-0224

Orientation: NE

Date of Photo: 07/16/2024

Time of Photo: 0914

Latitude: 33.204283

Longitude: -92.614433

Photographer: Kerri McCabe

Description: Looking NE, frac tanks and portable totes stored at the facility.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 3

Location: MidAmerica Environmental Holdings, LLC / USA Disposal (El Dorado) facility, located at 101 Warehouse Drive at 33.204359, -92.613940		
City: El Dorado	County/Parish: Union County	State: Arkansas



Photo File Name: 100-0225

Orientation: WNW

Date of Photo: 07/16/2024

Time of Photo: 0914

Latitude: 33.204283

Longitude: -92.614433

Photographer: Kerri McCabe

Description: Looking WNW, additional frac tanks and staged bulked material (liquid wastes mixed with sawdust) at the facility.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 4

Location: MidAmerica Environmental Holdings, LLC / USA Disposal (El Dorado) facility, located at 101 Warehouse Drive at 33.204359, -92.613940		
City: El Dorado	County/Parish: Union County	State: Arkansas



Photo File Name: 100-0226

Orientation: S

Date of Photo: 07/16/2024

Time of Photo: 0914

Latitude: 33.204283

Longitude: -92.614433

Photographer: Kerri McCabe

Description: Looking S, building used for sawdust storage.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 5

Location: MidAmerica Environmental Holdings, LLC / USA Disposal (El Dorado) facility, located at 101 Warehouse Drive at 33.204359, -92.613940		
City: El Dorado	County/Parish: Union County	State: Arkansas



Photo File Name: 100-0227

Orientation: SW

Date of Photo: 07/16/2024

Time of Photo: 0915

Latitude: 33.204267

Longitude: -92.614550

Photographer: Kerri McCabe

Description: Looking SW, frac tanks and former wastewater treatment area located at the facility.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 6

Location: MidAmerica Environmental Holdings, LLC / USA Disposal (El Dorado) facility, located at 101 Warehouse Drive at 33.204359, -92.613940

City: El Dorado

County/Parish: Union County

State: Arkansas



Photo File Name: 100-0228

Orientation: SSW

Date of Photo: 07/16/2024

Time of Photo: 0915

Latitude: 33.204267

Longitude: -92.615117

Photographer: Kerri McCabe

Description: Looking SSW, one of two concrete pits (South Pit) used to mix liquid wastes and sawdust.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 7

Location: MidAmerica Environmental Holdings, LLC / USA Disposal (El Dorado) facility, located at 101 Warehouse Drive at 33.204359, -92.613940

City: El Dorado

County/Parish: Union County

State: Arkansas



Photo File Name: 100-0229

Orientation: SE

Date of Photo: 07/16/2024

Time of Photo: 0916

Latitude: 33.204217

Longitude: -92.615200

Photographer: Kerri McCabe

Description: Looking SE, two of two concrete pits (North Pit) used to mix liquid wastes and sawdust.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 8

Location: MidAmerica Environmental Holdings, LLC / USA Disposal (El Dorado) facility, located at 101 Warehouse Drive at 33.204359, -92.613940		
City: El Dorado	County/Parish: Union County	State: Arkansas



Photo File Name: 100-0230

Orientation: N

Date of Photo: 07/16/2024

Time of Photo: 0916

Latitude: 33.204350

Longitude: -92.615300

Photographer: Kerri McCabe

Description: Looking N, bulked material stored under a covering in front of a concrete pit used to catch any leachate running off the material.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 9

Location: MidAmerica Environmental Holdings, LLC / USA Disposal (El Dorado) facility, located at 101 Warehouse Drive at 33.204359, -92.613940

City: El Dorado

County/Parish: Union County

State: Arkansas



Photo File Name: 100-0231

Orientation: NNE

Date of Photo: 07/16/2024

Time of Photo: 0916

Latitude: 33.204367

Longitude: -92.615217

Photographer: Kerri McCabe

Description: Looking NNE, berm built up around frac tanks holding unknown liquid wastes.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 10

Location: MidAmerica Environmental Holdings, LLC / USA Disposal (El Dorado) facility, located at 101 Warehouse Drive at 33.204359, -92.613940

City: El Dorado

County/Parish: Union County

State: Arkansas



Photo File Name: 100-0232

Orientation: NW

Date of Photo: 07/16/2024

Time of Photo: 0917

Latitude: 33.204467

Longitude: -92.615233

Photographer: Kerri McCabe

Description: Looking NW, bulked material under cover in front of the concrete pit used for collecting leachate from the bulked material.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 11

Location: MidAmerica Environmental Holdings, LLC / USA Disposal (El Dorado) facility, located at 101 Warehouse Drive at 33.204359, -92.613940		
City: El Dorado	County/Parish: Union County	State: Arkansas



Photo File Name: 100-0233

Orientation: WSW

Date of Photo: 07/16/2024

Time of Photo: 0917

Latitude: 33.204483

Longitude: -92.615367

Photographer: Kerri McCabe

Description: Looking WSW, the concrete pit below the leachate collection pit. This pit was below the required freeboard level listed in the state-issued permit (5077-WR-7).



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 12

Location: MidAmerica Environmental Holdings, LLC / USA Disposal (El Dorado) facility, located at 101 Warehouse Drive at 33.204359, -92.613940		
City: El Dorado	County/Parish: Union County	State: Arkansas



Photo File Name: 100-0234

Orientation: WSW

Date of Photo: 07/16/2024

Time of Photo: 0919

Latitude: 33.205200

Longitude: -92.616050

Photographer: Kerri McCabe

Description: Looking WSW, bulked material scattered around the facility property and dead trees noted at the property edge.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 13

Location: MidAmerica Environmental Holdings, LLC / USA Disposal (El Dorado) facility, located at 101 Warehouse Drive at 33.204359, -92.613940		
City: El Dorado	County/Parish: Union County	State: Arkansas



Photo File Name: 100-0235

Orientation: W

Date of Photo: 07/16/2024

Time of Photo: 0920

Latitude: 33.205317

Longitude: -92.616883

Photographer: Kerri McCabe

Description: Looking W, erodible soils from land disturbance activities, leachate staining from bulked material, and dead vegetation all observed within a wetland at the facility.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 14

Location: MidAmerica Environmental Holdings, LLC / USA Disposal (El Dorado) facility, located at 101 Warehouse Drive at 33.204359, -92.613940		
City: El Dorado	County/Parish: Union County	State: Arkansas



Photo File Name: 100-0236

Orientation: SSW

Date of Photo: 07/16/2024

Time of Photo: 0920

Latitude: 33.205317

Longitude: -92.616883

Photographer: Kerri McCabe

Description: Looking SSW, bulked material, with leachate staining, stacked adjacent to and placed into the wetland in Photo No. 13.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 15

Location: MidAmerica Environmental Holdings, LLC / USA Disposal (El Dorado) facility, located at 101 Warehouse Drive at 33.204359, -92.613940		
City: El Dorado	County/Parish: Union County	State: Arkansas



Photo File Name: 100-0237

Orientation: NW

Date of Photo: 07/16/2024

Time of Photo: 0920

Latitude: 33.205307

Longitude: -92.616883

Photographer: Kerri McCabe

Description: Looking NW, an additional view of the bulked material stacked adjacent to and placed into the wetland in Photo No. 13.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 16

Location: MidAmerica Environmental Holdings, LLC / USA Disposal (El Dorado) facility, located at 101 Warehouse Drive at 33.204359, -92.613940		
City: El Dorado	County/Parish: Union County	State: Arkansas



Photo File Name: 100-0238

Orientation: W

Date of Photo: 07/16/2024

Time of Photo: 0923

Latitude: 33.204667

Longitude: -92.615783

Photographer: Kerri McCabe

Description: Looking W, soil disturbance activities and dead vegetation at the perimeter of the property and within an additional wetland onsite.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 17

Location: MidAmerica Environmental Holdings, LLC / USA Disposal (El Dorado) facility, located at 101 Warehouse Drive at 33.204359, -92.613940		
City: El Dorado	County/Parish: Union County	State: Arkansas



Photo File Name: 100-0239

Orientation: W

Date of Photo: 07/16/2024

Time of Photo: 0924

Latitude: 33.204367

Longitude: -92.616117

Photographer: Kerri McCabe

Description: Looking W, a closer view of the dead vegetation and erodible soils from Photo No. 16.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 18

Location: MidAmerica Environmental Holdings, LLC / USA Disposal (El Dorado) facility, located at 101 Warehouse Drive at 33.204359, -92.613940		
City: El Dorado	County/Parish: Union County	State: Arkansas



Photo File Name: 100-0240

Orientation: NW

Date of Photo: 07/16/2024

Time of Photo: 0924

Latitude: 33.204350

Longitude: -92.616133

Photographer: Kerri McCabe

Description: Looking NW, an additional view of the dead vegetation and disturbed soil near the wetland in Photo No. 16 and No. 17.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 19

Location: MidAmerica Environmental Holdings, LLC / USA Disposal (El Dorado) facility, located at 101 Warehouse Drive at 33.204359, -92.613940		
City: El Dorado	County/Parish: Union County	State: Arkansas



Photo File Name: 100-0241

Orientation: SSW

Date of Photo: 07/16/2024

Time of Photo: 0924

Latitude: 33.204350

Longitude: -92.616133

Photographer: Kerri McCabe

Description: Looking SSW, an additional view of the erodible soils adjacent to the wetland in Photo No. 16 through No. 18.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 20

Location: MidAmerica Environmental Holdings, LLC / USA Disposal (El Dorado) facility, located at 101 Warehouse Drive at 33.204359, -92.613940		
City: El Dorado	County/Parish: Union County	State: Arkansas



Photo File Name: 100-0242

Orientation: SSE

Date of Photo: 07/16/2024

Time of Photo: 0924

Latitude: 33.204267

Longitude: -92.616050

Photographer: Kerri McCabe

Description: Looking SSE, the stormwater pond, permitted by the state under an IGP (ARR001445), with a fluid level that was lower than the fluid level noted during the 05/22/2024 inspection.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 21

Location: MidAmerica Environmental Holdings, LLC / USA Disposal (El Dorado) facility, located at 101 Warehouse Drive at 33.204359, -92.613940		
City: El Dorado	County/Parish: Union County	State: Arkansas



Photo File Name: 100-0243

Orientation: SSE

Date of Photo: 07/16/2024

Time of Photo: 0925

Latitude: 33.204167

Longitude: -92.616033

Photographer: Kerri McCabe

Description: Looking SSE, the upper drainpipe for the stormwater pond has been capped on the inside of the pond. The lower drainpipe was not observed.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 22

Location: MidAmerica Environmental Holdings, LLC / USA Disposal (El Dorado) facility, located at 101 Warehouse Drive at 33.204359, -92.613940

City: El Dorado

County/Parish: Union County

State: Arkansas



Photo File Name: 100-0244

Orientation: SSE

Date of Photo: 07/16/2024

Time of Photo: 0925

Latitude: 33.204167

Longitude: -92.616033

Photographer: Kerri McCabe

Description: Looking SSE, a closeup of the cap on the upper drainpipe in Photo No. 21.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 23

Location: MidAmerica Environmental Holdings, LLC / USA Disposal (El Dorado) facility, located at 101 Warehouse Drive at 33.204359, -92.613940		
City: El Dorado	County/Parish: Union County	State: Arkansas



Photo File Name: 100-0245

Orientation: SSW

Date of Photo: 07/16/2024

Time of Photo: 0925

Latitude: 33.204117

Longitude: -92.616017

Photographer: Kerri McCabe

Description: Looking SSW, an exterior view of the upper drainpipe for the stormwater pond. The cap was off, but the valve was closed. The lower drainpipe was not observed. The thinner, white pipe in the photo was actively dripping into the receiving stream; source of pipe was unknown.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 24

Location: MidAmerica Environmental Holdings, LLC / USA Disposal (El Dorado) facility, located at 101 Warehouse Drive at 33.204359, -92.613940		
City: El Dorado	County/Parish: Union County	State: Arkansas



Photo File Name: 100-0246

Orientation: SSW

Date of Photo: 07/16/2024

Time of Photo: 0925

Latitude: 33.204117

Longitude: -92.616031

Photographer: Kerri McCabe

Description: Looking SSW, a closeup view of the thinner, white pipe (unknown source) actively dripping into the receiving stream from Photo No. 23.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 25

Location: MidAmerica Environmental Holdings, LLC / USA Disposal (El Dorado) facility, located at 101 Warehouse Drive at 33.204359, -92.613940

City: El Dorado

County/Parish: Union County

State: Arkansas



Photo File Name: 100-0247

Orientation: SSW

Date of Photo: 07/16/2024

Time of Photo: 0926

Latitude: 33.204117

Longitude: -92.616031

Photographer: Kerri McCabe

Description: Looking SSW, the receiving stream upstream of the stormwater pond drainpipes. Coloration of the stream was typical for the area, and live fishes were observed.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 26

Location: MidAmerica Environmental Holdings, LLC / USA Disposal (El Dorado) facility, located at 101 Warehouse Drive at 33.204359, -92.613940

City: El Dorado

County/Parish: Union County

State: Arkansas



Photo File Name: 100-0248

Orientation: WSW

Date of Photo: 07/16/2024

Time of Photo: 0926

Latitude: 33.204117

Longitude: -92.616031

Photographer: Kerri McCabe

Description: Looking WSW, the receiving stream downstream of the stormwater pond drainpipes. Coloration of the stream was typical for the area, and live fishes were observed.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 27

Location: MidAmerica Environmental Holdings, LLC / USA Disposal (El Dorado) facility, located at 101 Warehouse Drive at 33.204359, -92.613940		
City: El Dorado	County/Parish: Union County	State: Arkansas



Photo File Name: 100-0249

Orientation: SE

Date of Photo: 07/16/2024

Time of Photo: 0926

Latitude: 33.204017

Longitude: -92.615633

Photographer: Kerri McCabe

Description: Looking SE, drainage area for the southern portion of the facility with stormwater flow directed toward the stormwater pond.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 28

Location: MidAmerica Environmental Holdings, LLC / USA Disposal (El Dorado) facility, located at 101 Warehouse Drive at 33.204359, -92.613940

City: El Dorado

County/Parish: Union County

State: Arkansas



Photo File Name: 100-0250

Orientation: SSW

Date of Photo: 07/16/2024

Time of Photo: 0936

Latitude: 33.204117

Longitude: -92.615233

Photographer: Kerri McCabe

Description: Looking SSW, a concrete holding pit for the storage of liquid wastes located in the former wastewater treatment area.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 29

Location: MidAmerica Environmental Holdings, LLC / USA Disposal (El Dorado) facility, located at 101 Warehouse Drive at 33.204359, -92.613940		
City: El Dorado	County/Parish: Union County	State: Arkansas



Photo File Name: 100-0251

Orientation: SE

Date of Photo: 07/16/2024

Time of Photo: 0936

Latitude: 33.204050

Longitude: -92.615017

Photographer: Kerri McCabe

Description: Looking SE, frac tanks or other storage containers have been removed from an area next to the sawdust storage building.