

Region 6 - Enforcement & Compliance Assurance Division
INSPECTION REPORT

Inspection Date(s):	04/15/2025	
Media Program:	Water (CWA)	
Regulatory Program(s)	Water (CWA) Brine Program (Oil & Gas inspection)	
Company Name:	Enerco Operating Corporation	
Facility Name:	Clark Tank Battery	
Facility Physical Location:	Off County Road 249 at 33.320769, -93.813836	
(city, state, zip code)	Genoa, AR 71840	
Mailing address:	11535 East Ricks Circle	
(city, state, zip code)	Dallas, TX 75230	
County/Parish:	Miller County	
Facility Phone Number	870-953-0287	
Facility Contact:	Terry Collum	Field Supervisor
	terrycollum@enercooperating.com	
FRS Number:	N/A	
Identification/Permit Number:	ARU002311	
Media Identifier Number:	N/A	
NAICS:	211111	
SIC:	1311	
Personnel participating in inspection:		
Uma Lad	EPA / Region 6 ECDW	Inspector / Enforcement Officer
Kerri McCabe	EPA / Region 6 ECDW	Inspector / Enforcement Officer
Michael Blaha	EPA / Region 6 ECDW	Inspector / Enforcement Officer
EPA Lead Inspector Signature/Date		
	Uma Lad	Date
Supervisor Signature/Date		
	Jeanne Eckhart	Date

Section I – INTRODUCTION

PURPOSE OF THE INSPECTION

Environmental Protection Agency (EPA) Region 6 inspectors Uma Lad, Kerri McCabe, and Michael Blaha arrived at the Enerco Operating Corporation / Clark Tank Battery, located off County Road 249 at 33.320769, -93.813836, at 5:30 PM on 04/15/2025 for an unannounced inspection. The inspection was conducted by the authority of the Clean Water Act (CWA) to determine compliance with EPA regulations. There were no other federal, state, or local agency representatives present at the time of the inspection.

FACILITY DESCRIPTION

EPA conducted an inspection on the Enerco Operating Corporation / Clark Tank Battery, which consists of three (3) storage tanks.

Section II – OBSERVATIONS

I observed the facility and associated signage and secondary containment with storage tanks; see Appendix 1 (Photograph Log), Photo No. 1 and No. 2. For additional GPS location and photo metadata, see Appendix 1.

I observed woody vegetation on the secondary containment berm, see Photo No. 1 and No. 2. I observed loose oil inside secondary containment, see Photo No. 3. I also observed two (2) tanks labeled “not in use” but did not include the date that they were no longer in use, see Photo No. 3. The third tank at the facility was missing both a “not in use” label and a date, see Photo No. 2.

Section III – AREAS OF CONCERN

No closing conference was held due to no personnel from Enerco Operating Corporation present during the inspection. The areas of concern include: the woody vegetation on the secondary containment berm, the loose oil inside secondary containment, and the tanks missing the “not in use” label with a date.

The “not-in-use” tanks are subject to the SPCC rule unless the facility meets the requirements for a permanently closed tank. According to §112.2, a container or facility is permanently closed if “(1) all liquid and sludge has been removed from each container and connecting line; and (2) all connecting lines and piping have been disconnected from the container and blanked off, all valves (except ventilation valves) have been closed and locked, and conspicuous signs have been posted on each container stating that it is a permanently closed container and noting the date of closure.”

Section IV – FOLLOW UP

Inspector will provide the completed inspection report to company representative(s).

Section V – LIST OF APPENDICES

Appendix 1 – Photograph Log* – 3 photos taken 04/15/2025.

**The photos were captured in HEIC format and converted to JPG format for the purpose of drafting the Photograph Log. The original photos are retained with their metadata.*

Appendix 1

Photograph Log

3 Photos



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 1

Location: Off County Road 249 at 33.320769, -93.813836		
City: Genoa	County/Parish: Miller	State: AR



Photo File Name: 20250415_223716714_iOS

Orientation: North

Date of Photo: 04/15/2025

Time of Photo: 5:37 PM

Latitude: 33.320769

Longitude: -93.813836

Photographer: Uma Lad

Description: Looking north, this photo shows the sign at the facility and loose oil inside secondary containment.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 2

Location: Off County Road 249 at 33.320769, -93.813836		
City: Genoa	County/Parish: Miller	State: AR



Photo File Name: 20250415_223242311_iOS

Orientation: North

Date of Photo: 04/15/2025

Time of Photo: 5:32 PM

Latitude: 33.320769

Longitude: -93.813836

Photographer: Uma Iad

Description: Looking north, this photo shows an overview of the facility, with woody vegetation on the secondary containment berm. The tank on the far right of the photo is missing a "not in use" label and date.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 3

Location: Off County Road 249 at 33.320769, -93.813836		
City: Genoa	County/Parish: Miller	State: AR



Photo File Name: 20250415_223302850_iOS

Orientation: Northwest

Date of Photo: 04/15/2025

Time of Photo: 5:33 PM

Latitude: 33.320878

Longitude: -93.813758

Photographer: Uma Lad

Description: Looking northwest, this photo shows loose oil inside secondary containment. The two (2) tanks marked "not in use" are missing dates and proper close out of tanks according to §112.2.