



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8
RESOURCE CONSERVATION AND RECOVERY ACT**

GENERAL INFORMATION

Facility Name: RNI Seep Ridge COWDF

Facility Location: Lat/Long 39.903345,
-109.61106

RCRA ID: UTR000014761

Notification Status: Non-notifier

Facility Contacts:

Kendal Hacking, Operations Manager
and
Spencer Merrell, Environmental Specialist

Date of Inspection: October 26, 2022

Arrival Time: 12:25 p.m.

Departure Time: 1:40 p.m.

Lead Inspector: Annette Maxwell, U.S. EPA RCRA Inspector

Inspection Attendees:

1. Kendal Hacking, RN Industries, Inc (RNI)/Dalbo Holdings, Inc (DHI)
2. Spencer Merrell, RNI/DHI

Type and Purpose of Inspection: Compliance Evaluation Inspection (CEI) and Compliance Schedule Evaluation (CSE)

Facility Type: Commercial Oilfield Waste Disposal Facility

Applicable Regulations to Inspection: RCRA Section 7003

Inspection Detail:

- Unannounced Inspection
- Facility located within the exterior boundaries of the Uintah & Ouray Reservation
- Site located on State of Utah School and Institutional Trust Lands Administration (SITLA) land

OPENING CONFERENCE

Prior to arrival at the facility, an opening conference with Mr. Hacking and Mr. Merrell with introductions, presentation of EPA credentials, and explanation of the purpose of the inspection was conducted at a separate RNI/DHI facility (Wonsit, EPA ID No. UTR000014605) earlier the same day. I also explained that separate inspection reports will be provided for each RNI/DHI facility inspected. Following the inspection at Wonsit, we proceeded to Seep Ridge.

Company Ownership: RN Industries, Inc., a subsidiary of Dalbo Holdings, Inc.

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General Facility and Process Description: The RNI Seep Ridge facility (Seep Ridge) is a commercial oilfield waste disposal facility (COWDF) that receives RCRA Subtitle C-exempt E&P oilfield waste for storage, treatment and/or disposal. The site includes five evaporation ponds, one slop/skim pond, and one slop/skim vault with concrete cover. The facility was not in operation at the time of the inspection. During typical operations, incoming truck loads are offloaded into a vault located near the northeast corner of the facility, then routed to the skim pond and evaporation ponds.

ADDITIONAL INFORMATION

A RCRA administrative order on consent (AOC), Docket RCRA-08-2020-0003, was issued by the EPA on November 13, 2019, to address concerns related to findings from an October 25, 2018, inspection in which waterfowl mortalities involving multiple species and different states of decay indicating an ongoing issue were documented. Under the AOC, RNI established a monitoring program to evaluate threats to wildlife posed by Pond 7.

TOUR INFORMATION

Upon arrival at Seep Ridge, Mr. Hacking and Mr. Merrell accompanied me on a walk-through of the site. Mr. Hacking stated that the facility was closed and was not accepting waste at that time. I did not observe trucks delivering loads during the inspection. Mr. Hacking said that reports of facility activity are sent biannually to SITLA, and that weekly inspections of the facility are conducted. He also stated that groundwater wells at the site are tested regularly, and the results are reported to the Utah Division of Oil, Gas and Mining.

Areas of the facility toured:

- Evaporation ponds (five)
- Slop/skim vault with concrete cover
- Truck offload at slop/skim vault
- Slop/skim pond

A site map is included in Attachment 1 – Site Map.

Data Collected and Observations:

All photographs described below are included in Attachment 2 – Photo Log.

During the inspection, I did not observe ground-level gapping or holes in the netting over the slop/skim pit. See photos 21-24. The color of the material in the pit was a lighter brown color than is usually encountered, possibly because of weathering due to inactivity at the site. The netting appeared to be in good condition.

At evaporation Pond 7 located in the southeast portion of the facility, I observed that bird deterrent owl decoys had been placed in multiple locations around the pond. Partial installations

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of previous bird deterrent systems (tape and reflectors) were also present at Pond 7. The pond was low, and no water was being added from the slop/skim pit at the time of the inspection. I did not observe evidence of wildlife presence, injury or mortality at the time of the inspection, and did not observe oil or sheen on the surface of the pond. See photos 1-9.

We then proceeded to the remaining ponds. I observed Pond 3 (no photos taken), Pond 4, Pond 5 and Pond 6. See photos 10-20.

At the truck offload area, which includes the vault and three tanks, I observed that no recent tire marks were evident on the ground surface and that vegetation was growing in the area, indicating that no recent truck traffic had occurred. See photos 26-29. Mr. Hacking stated that the offload log setup for drivers to provide offload information had been taken to the Wonsit facility for use there.

CLOSING CONFERENCE

During the closing conference with Mr. Hacking and Mr. Merrell, I indicated that I did not observe concerns related to RCRA during the inspection.

SIGNATURES

Annette Maxwell, Lead RCRA Inspector

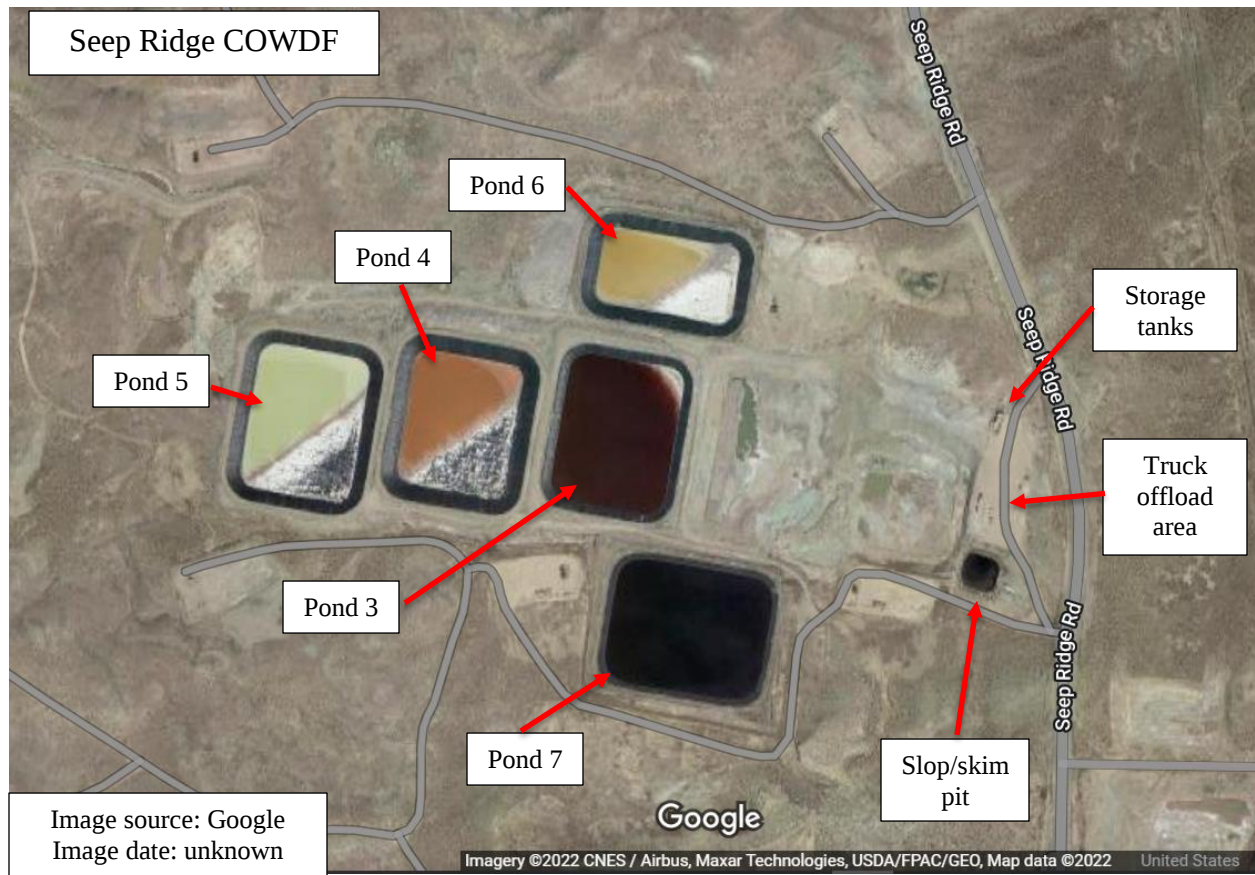
Janice A. Pearson, Manager
RCRA & OPA Enforcement Branch
Enforcement and Compliance Assurance Division

Attachment List

- 1 – Site Map
- 2 – Photo Log

Facility Name: RNI Seep Ridge COWDF
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ATTACHMENT 1: SITE MAP



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ATTACHMENT 2: PHOTO LOG

Photographer: Annette Maxwell

Photo 1, 20221026_124214.jpg 10/26/2022 12:42 p.m., photo of bird deterrent owl decoy set up at Pond 7. Pond 4 is visible to right in the background.



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Photo 2, 20221026_124404.jpg 10/26/2022 12:44 p.m., photo of Pond 7, taken from northwest corner of the pond facing east.



Photo 3, 20221026_124407.jpg 10/26/2022 12:44 p.m., photo of Pond 7, panned right from photo 2.



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Photo 4, 20221026_124410.jpg 10/26/2022 12:44 p.m., photo of Pond 7, panned right from photo 3.



Photo 5, 20221026_124706.jpg 10/26/2022 12:47 p.m., photo of Pond 7, taken from southwest corner of Pond 7 facing north.



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Photo 6, 20221026_124709.jpg 10/26/2022 12:47 p.m., photo of Pond 7, panned right from photo 5.



Photo 7, 20221026_124711.jpg 10/26/2022 12:47 p.m., photo of Pond 7, panned right from photo 6.



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Photo 8, 20221026_125115.jpg 10/26/2022 12:51 p.m., photo of previously attempted bird deterrents including remnants of reflective tape/ribbon and reflective disc.



Photo 9, 20221026_125124.jpg 10/26/2022 12:51 p.m., photo of bird deterrent on fence behind southeast corner of Pond 7.



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Photo 10, 20221026_130347.jpg 10/26/2022 1:03 p.m., photo of Pond 4 taken from northwest corner of the pond.



Photo 11, 20221026_130350.jpg 10/26/2022 1:03 p.m., photo of Pond 4, panned right from photo 10.



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Photo 12, 20221026_130353.jpg 10/26/2022 1:03 p.m., photo of Pond 4, panned right from photo 11.



Photo 13, 20221026_130355.jpg 10/26/2022 1:03 p.m., photo of Pond 4, panned right from photo 12.



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Photo 14, 20221026_130440.jpg 10/26/2022 1:04 p.m., photo of Pond 5 (to right, with Pond 4 visible to left) near northeast corner, facing south.



Photo 15, 20221026_130442.jpg 10/26/2022 1:04 p.m., photo of Pond 5, panned right from photo 14.



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Photo 16, 20221026_130444.jpg 10/26/2022 1:04 p.m., photo of Pond 5, panned right from photo 15.



Photo 17, 20221026_130446.jpg 10/26/2022 1:04 p.m., photo of Pond 5, panned right from photo 16.



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Photo 18, 20221026_131333.jpg 10/26/2022 1:13 p.m., photo of Pond 6 taken near southeast corner facing west. Black leak detection point pipe is visible to left.



Photo 19, 20221026_131335.jpg, 10/26/2022 1:13 p.m., photo of Pond 6, panned right from photo 18.



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Photo 20, 20221026_131337.jpg, 10/26/2022 1:13 p.m., photo of Pond 6, panned right from photo 19.



Photo 21, 20221026_132146.jpg, 10/26/2022 1:21 p.m., photo of slop/skim pit taken from north side facing south. Netting appeared to be in good condition.



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Photo 22, 20221026_132148.jpg, 10/26/2022 1:21 p.m., photo of slop/skim pit, panned right from photo 21.



Photo 23, 20221026_132150.jpg, 10/26/2022 1:21 p.m., photo of slop/skim pit, panned right from photo 22.



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Photo 24, 20221026_132153.jpg, 10/26/2022 1:21 p.m., photo of slop/skim pit, panned right from photo 23.



Photo 25, 20221026_132240.jpg, 10/26/2022 1:22 p.m., photo of truck unload/vault area taken from south end of area (north of slop/skim pit) facing northwest. The offload area did not appear to have been recently trafficked, with no apparent tire marks and with weeds growing indicating no recent incoming trucks. Ponding in this area appeared to be due to recent precipitation.



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Photo 26, 20221026_132242.jpg, 10/26/2022 1:22 p.m., photo of truck offload/vault area, panned right from photo 25.



Photo 27, 20221026_132245.jpg, 10/26/2022 1:22 p.m., photo of truck offload/vault area, panned right from photo 26.



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Photo 28, 20221026_132749.jpg, 10/26/2022 1:27 p.m., photo of tanks located near truck offload area.



Photo 29, 20221026_132809.jpg, 10/26/2022 1:28 p.m., photo of the same tanks shown in photo 28, with markings “do not use” painted on each tank.

