

Region 6 - Enforcement & Compliance Assurance Division
INSPECTION REPORT

Inspection Date(s):	05/22/2024	
Media Program:	Water (CWA)	
Regulatory Program(s)	Water (CWA) Industrial Stormwater Program	
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	501-404-2020	
Facility Contact:	Kirk Brown (318-773-3852)	Director of Operations
	Kirk.brown@trekkerenergy.com	
FRS Number:	N/A	
Identification/Permit Number:	ARR001445; ADEQ AFIN 70-01210 for the facility	
Media Identifier Number:	N/A	
NAICS:	213112	
SIC:	1389	
Personnel participating in inspection:		
Kerri McCabe	EPA / Region 6 ECDW	Inspector / Enforcement Officer
Michael Young	ADEQ / Office of Water Quality	Inspector Supervisor
Kirk Brown	Trekker Energy Services	Director of Operations
Cody Eubanks	MidAmerica Environ. Holdings, LLC	Site Manager
EPA Lead Inspector Signature/Date	KERRI MCCABE Kerri McCabe	Digitally signed by KERRI MCCABE Date: 2024.06.05 10:52:01 -05'00' Date
Supervisor Signature/Date	JEANNE ECKHART Jeanne Eckhart	Digitally signed by JEANNE ECKHART Date: 2024.06.10 16:22:26 -05'00' Date

Section I – INTRODUCTION

PURPOSE OF THE INSPECTION

EPA Region 6 inspector Kerri McCabe (lead) arrived at MidAmerica Environmental Holdings, LLC / USA Disposal – El Dorado, located at 101 Warehouse Drive, El Dorado, Arkansas, 71730 at 33.204359, -92.613940; at 1050 on 05/22/2024 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) and the National Pollution Discharge Elimination System (NPDES) Industrial Stormwater General Permit (IGP; ARR001445) issued by the Arkansas Department of Energy and Environment – Division of Environmental Quality (hereafter “ADEQ”) to determine compliance with Environmental Protection Agency (EPA) regulations. Mr. Micheal Young, with ADEQ – Office of Water Quality – Compliance Branch, was present at the time of the inspection.

Details of the latest IGP inspection conducted by ADEQ – Office of Water Quality on 04/22/2020 can be found at the following hyperlink:

<https://www.adeg.state.ar.us/downloads/WebDatabases/InspectionsOnline/111813-insp.pdf>

FACILITY DESCRIPTION

EPA conducted an inspection on the MidAmerica Environmental Holdings, LLC / USA Disposal – El Dorado site, 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, approximately 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.

The original IGP was issued 06/11/2015, and the IGP has been recertified once for 2019. The general permit expires 06/30/2024.

For additional information on the facility’s IGP history and original SWPPP, see the hyperlinks below:

[https://www.adeg.state.ar.us/home/pdssql/p_permits_online_npdes_additional.aspx?PmtNbr=ARR001445&Category=IssuedPermits&Title=Permit%20History%20\(Construction,%20Modifications,%20And%20Discharge\)](https://www.adeg.state.ar.us/home/pdssql/p_permits_online_npdes_additional.aspx?PmtNbr=ARR001445&Category=IssuedPermits&Title=Permit%20History%20(Construction,%20Modifications,%20And%20Discharge))

https://www.adeg.state.ar.us/downloads/WebDatabases/PermitsOnline/NPDES/PermitInformation/ARR001445_SWPPP_20150528.pdf



Aerial Image 1. Overview of USA Disposal facility. Google Earth image date 05/14/2023.

Section II – OBSERVATIONS

I observed the signage and an overview of the facility, see Appendix 1 (Photograph Log), Photo No. 1 and No. 2. For additional GPS location and photo metadata, see Appendix 1.

I observed eight (8) frac tanks with no secondary containment and heavy equipment, such as a bulldozer and an excavator, used for material handling. There was no labeling on the frac tanks, and black liquid and staining were observed on the ground. See Photo No. 3 through No. 5.

I observed a solid waste dumpster onsite. See Photo No. 6.

I observed areas of disturbed soil throughout the property. See Photo No. 7 through No. 9.

I observed locations on the property that were being used as laydown areas for storage of miscellaneous items, such as heavy equipment, piping, totes with and without contents, a portable toilet, and a wastewater treatment unit. See Photo No. 10 through No. 13.

I observed bulked material (sawdust blended with liquid wastes) stockpiled on the property. Some stockpiles contained solid waste. See Photo No. 14 and No. 22.

I observed an excavated pit, which contained bulked material, synthetic liners, and leachate. See Photo No. 15 through No. 18.

I observed bulked material and leachate adjacent to wetlands on the property. See Photo No. 19 through No. 21 and No. 24 and No. 25.

I observed bulked material land applied directly onto the ground at the property. See Photo No. 23.

I observed the stormwater pond, which contained unknown liquid wastes and sediment. Black staining, a hydrocarbon sheen, gas bubbles, and an odor were noted from the stormwater pond. Erosion gullies leading to the receiving stream, an unnamed tributary (UT) of Boggy Creek, were noted in the stormwater pond levee. See Photo No. 26 through No. 30, and No. 35.

I observed the drainpipes, shutoff valves, and screw caps for the stormwater pond. The cap was missing from the uppermost drainpipe, and an active discharge to the receiving stream was observed. See Photo No. 31 through No. 33.

I observed the condition of the receiving stream directly upstream of the drainpipes and erosion gullies. Unknown material, black staining, and odor were noted from the receiving stream. See Photo No. 34.

I observed a drainage imbedded through the process area leading toward the stormwater pond. Unknown liquid waste, black staining, and odor were noted from the drainage. See Photo No. 36 and No. 37.

I observed one (1) of the concrete holding pits with piping, which contained unknown liquid wastes. Black staining was noted outside the holding pit. See Photo No. 38 and No. 39.

I observed dead earthworms in an unknown material in the drainage referenced in Photo No. 38 and No. 39. See Photo No. 40.

I observed the building for bulking material storage with sawdust and leachate outside the building. See Photo No. 41.

I observed one (1) frac tank and two (2) smaller concrete holding pits, which contained unknown liquid wastes. Black liquid and staining were noted outside the holding pits. See Photo No. 42 through No. 44.

I observed one (1) of the concrete holding pits with hosing, which contained unknown liquid wastes. I noted the available freeboard and an erosion gully in the earthen berm. Black liquid and staining were observed outside the holding pit. See Photo No. 45 through No. 47 and No. 50.

I observed one (1) of the concrete holding pits used for leachate collection, which contained leachate from bulked material. Black liquid and hydrocarbon sheen were noted in the holding pit. An erosion gully was observed in the earthen berm around the holding pit. The erosion gully led to the holding pit referenced in Photo No. 45. See Photo No. 48 and No. 49 and No. 51.

I observed uncovered bulked material, leachate from the bulked material on the ground, and frac tanks outside containment. The frac tanks were not labeled (contents unknown). See Photo No. 52 through No. 54 and No. 56.

I observed the building used for bulking material (sawdust) storage. See Photo No. 55.

I observed a “Material / Waste Transfer Form” and a bill of lading from the facility for an incoming truckload. See Photo No. 57 and No. 58.

I observed the receiving stream, upstream of the facility, on both sides of a culvert running under Industrial Road. Characteristics of the receiving stream were noted. See Photo No. 59 and No. 60.

Section III – AREAS OF CONCERN

A closing conference was held with Mr. Kirk Brown with Trekker Energy Services during the inspection. Areas of concern at the time of the inspection include the following (also noted with Appendix 2, IGP Inspection Check Sheet):

- An active discharge from the stormwater pond via opened drainpipe of stormwater commingled with unknown liquid wastes, see IGP, Part 1, 1.8, 1.8.1;
- The facility is operating under an additional sector (Sector L2, specifically) that is not incorporated in the Notice of Intent (NOI) for the facility, see IGP, Part 2, 2.3, 2.3.3;
- There were spills and leaks of unknown liquid wastes noted throughout the property and in the stormwater pond, see IGP, Part 3, 3.1.1 (Minimize Exposure), 3.1.2 (Good Housekeeping), 3.1.4 (Spill Prevention and Response), and 3.1.5 (Erosion and Sediment Control), 3.1.8 (Employee Training), 3.1.9 (Non-Stormwater Discharges), 3.1.10 (Waste, Garbage, and Floatable Debris);
- There were no records of monitoring and sampling of the facility’s stormwater outfall, see IGP, Part 3, 3.4;
- The operator is not conducting annual monitoring and sampling of the facility’s stormwater outfall, see IGP, Part 3, 3.6;
- The facility SWPPP has not been updated since 2015, see IGP, Part 4, 4.1 and 4.5;
- The SWPPP was not available onsite, and the original SWPPP submitted with the NOI was reviewed from the ADEQ website, see IGP, Part 4, 4.4;
- There were no records of inspections being conducted at the facility, see IGP, Part 5, 5.1.1 and 5.1.2;
- There were no records for the Stormwater Annual Report (SWAR), see IGP, Part 5, 5.2.4;
- Unknown liquid wastes in the stormwater pond were actively discharging via the drainpipe for the stormwater pond, see IGP, Part 7, 7.5;
- The stormwater pond contains unknown liquid wastes due to housekeeping issues and overflows at the waste storage containments, see IGP, Part 7, 7.17, 7.17.1;
- There are no records to indicate that the facility has notified the EPA or ADEQ of non-compliance, see IGP, Part 7, 7.23.

Information about the IGP (ARR001445), issued to the operator by ADEQ, can be viewed at the following hyperlink:

<https://www.adeq.state.ar.us/downloads/WebDatabases/PermitsOnline/NPDES/Permits/ARR001445.pdf>

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 – 60 photos taken 05/22/2024.

Appendix 2 – IGP Inspection Check Sheet

Appendix 1

Photograph Log 60 Photos



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 1

Location: MidAmerica Environmental Holdings, LLC – USA Disposal at 101 Warehouse Drive, El Dorado, AR 71730 (33.204439, -92.613947)		
City: El Dorado	County/Parish: Union	State: Arkansas



Photo File Name: R0010150

Orientation: SW

Date of Photo: 05/22/2024

Time of Photo: 1231

Latitude: 33.204317

Longitude: -92.614067

Photographer: Kerri McCabe

Description: Looking SW, this photo showed the signage for the facility.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 2

Location: MidAmerica Environmental Holdings, LLC – USA Disposal at 101 Warehouse Drive, El Dorado, AR 71730 (33.204439, -92.613947)		
City: El Dorado	County/Parish: Union	State: Arkansas



Photo File Name: R0010151

Orientation: NW

Date of Photo: 05/22/2024

Time of Photo: 1231

Latitude: 33.204305

Longitude: -92.614038

Photographer: Kerri McCabe

Description: Looking NW, this photo showed the overview of the facility.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 3

Location: MidAmerica Environmental Holdings, LLC – USA Disposal at 101 Warehouse Drive, El Dorado, AR 71730 (33.204439, -92.613947)		
City: El Dorado	County/Parish: Union	State: Arkansas



Photo File Name: R0010152

Orientation: NE

Date of Photo: 05/22/2024

Time of Photo: 1232

Latitude: 33.204590

Longitude: -92.614254

Photographer: Kerri McCabe

Description: Looking NE, this photo showed four (4) frac tanks (without containment) and heavy equipment at the facility. Frac tanks were not labeled (contents unknown).



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 4

Location: MidAmerica Environmental Holdings, LLC – USA Disposal at 101 Warehouse Drive, El Dorado, AR 71730 (33.204439, -92.613947)

City: El Dorado

County/Parish: Union

State: Arkansas



Photo File Name: R0010155

Orientation: SE

Date of Photo: 05/22/2024

Time of Photo: 1233

Latitude: 33.204666

Longitude: -92.614200

Photographer: Kerri McCabe

Description: Looking SE, this photo showed the opposite view from Photo No. 3. A spill was observed in front of the red frac tank.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 5

Location: MidAmerica Environmental Holdings, LLC – USA Disposal at 101 Warehouse Drive, El Dorado, AR 71730 (33.204439, -92.613947)		
City: El Dorado	County/Parish: Union	State: Arkansas



Photo File Name: R0010153

Orientation: NE

Date of Photo: 05/22/2024

Time of Photo: 1232

Latitude: 33.204630

Longitude: -92.614228

Photographer: Kerri McCabe

Description: Looking NE, this photo showed four (4) more additional frac tanks (without containment) onsite. The frac tanks were not labeled (contents unknown).



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 6

Location: MidAmerica Environmental Holdings, LLC – USA Disposal at 101 Warehouse Drive, El Dorado, AR 71730 (33.204439, -92.613947)		
City: El Dorado	County/Parish: Union	State: Arkansas



Photo File Name: R0010154

Orientation: N-NW

Date of Photo: 05/22/2024

Time of Photo: 1232

Latitude: 33.204612

Longitude: -92.614250

Photographer: Kerri McCabe

Description: Looking N-NW, this photo showed a solid waste dumpster onsite.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 7

Location: MidAmerica Environmental Holdings, LLC – USA Disposal at 101 Warehouse Drive, El Dorado, AR 71730 (33.204439, -92.613947)		
City: El Dorado	County/Parish: Union	State: Arkansas



Photo File Name: R0010156

Orientation: SW

Date of Photo: 05/22/2024

Time of Photo: 1235

Latitude: 33.205900

Longitude: -92.614517

Photographer: Kerri McCabe

Description: Looking SW, this photo showed an area of disturbed soil at the facility.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 8

Location: MidAmerica Environmental Holdings, LLC – USA Disposal at 101 Warehouse Drive, El Dorado, AR 71730 (33.204439, -92.613947)		
City: El Dorado	County/Parish: Union	State: Arkansas



Photo File Name: R0010157

Orientation: S-SW

Date of Photo: 05/22/2024

Time of Photo: 1237

Latitude: 33.206347

Longitude: -92.614905

Photographer: Kerri McCabe

Description: Looking S-SW, this photo showed an area of disturbed soil at the facility.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 9

Location: MidAmerica Environmental Holdings, LLC – USA Disposal at 101 Warehouse Drive, El Dorado, AR 71730 (33.204439, -92.613947)		
City: El Dorado	County/Parish: Union	State: Arkansas



Photo File Name: R0010158

Orientation: S-SW

Date of Photo: 05/22/2024

Time of Photo: 1237

Latitude: 33.206350

Longitude: -92.615783

Photographer: Kerri McCabe

Description: Looking S-SW, this photo showed an area of disturbed soil at the facility.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 10

Location: MidAmerica Environmental Holdings, LLC – USA Disposal at 101 Warehouse Drive, El Dorado, AR 71730 (33.204439, -92.613947)

City: El Dorado

County/Parish: Union

State: Arkansas



Photo File Name: R0010159

Orientation: W-NW

Date of Photo: 05/22/2024

Time of Photo: 1237

Latitude: 33.206364

Longitude: -92.615840

Photographer: Kerri McCabe

Description: Looking W-NW, this photo showed one of two areas used as a laydown yard (storage) at the facility.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 11

Location: MidAmerica Environmental Holdings, LLC – USA Disposal at 101 Warehouse Drive, El Dorado, AR 71730 (33.204439, -92.613947)		
City: El Dorado	County/Parish: Union	State: Arkansas



Photo File Name: R0010160

Orientation: NW

Date of Photo: 05/22/2024

Time of Photo: 1238

Latitude: 33.206333

Longitude: -92.616483

Photographer: Kerri McCabe

Description: Looking NW, this photo showed storage tanks at the facility. Dead vegetation was noted around the totes (contents unknown).



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 12

Location: MidAmerica Environmental Holdings, LLC – USA Disposal at 101 Warehouse Drive, El Dorado, AR 71730 (33.204439, -92.613947)		
City: El Dorado	County/Parish: Union	State: Arkansas



Photo File Name: R0010161

Orientation: S-SW

Date of Photo: 05/22/2024

Time of Photo: 1239

Latitude: 33.206275

Longitude: -92.616507

Photographer: Kerri McCabe

Description: Looking S-SW, this photo showed two of two areas used as a laydown yard (storage) with totes and a portable toilet onsite.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 13

Location: MidAmerica Environmental Holdings, LLC – USA Disposal at 101 Warehouse Drive, El Dorado, AR 71730 (33.204439, -92.613947)

City: El Dorado

County/Parish: Union

State: Arkansas



Photo File Name: R0010162

Orientation: N-NE

Date of Photo: 05/22/2024

Time of Photo: 1239

Latitude: 33.206333

Longitude: -92.616417

Photographer: Kerri McCabe

Description: Looking N-NE, this photo showed the wastewater treatment system (filter and press) stored onsite.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 14

Location: MidAmerica Environmental Holdings, LLC – USA Disposal at 101 Warehouse Drive, El Dorado, AR 71730 (33.204439, -92.613947)		
City: El Dorado	County/Parish: Union	State: Arkansas



Photo File Name: R0010163

Orientation: S-SE

Date of Photo: 05/22/2024

Time of Photo: 1240

Latitude: 33.205967

Longitude: -92.616083

Photographer: Kerri McCabe

Description: Looking S-SE, this photo showed bulked waste material (liquid waste blended with sawdust) with runoff adjacent to the stockpile. Synthetic liner pieces were observed in the bulked material, and algal growth was noted in the adjacent pooled runoff.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 15

Location: MidAmerica Environmental Holdings, LLC – USA Disposal at 101 Warehouse Drive, El Dorado, AR 71730 (33.204439, -92.613947)		
City: El Dorado	County/Parish: Union	State: Arkansas



Photo File Name: R0010164

Orientation: SW

Date of Photo: 05/22/2024

Time of Photo: 1241

Latitude: 33.205884

Longitude: -92.616117

Photographer: Kerri McCabe

Description: Looking SW, this photo showed an excavated pit with bulked material and solid waste inside the pit.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 16

Location: MidAmerica Environmental Holdings, LLC – USA Disposal at 101 Warehouse Drive, El Dorado, AR 71730 (33.204439, -92.613947)

City: El Dorado

County/Parish: Union

State: Arkansas



Photo File Name: R0010165

Orientation: SW

Date of Photo: 05/22/2024

Time of Photo: 1241

Latitude: 33.205884

Longitude: -92.616117

Photographer: Kerri McCabe

Description: Looking SW, this photo showed a closer view of the excavated pit and contents from Photo No. 15.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 17

Location: MidAmerica Environmental Holdings, LLC – USA Disposal at 101 Warehouse Drive, El Dorado, AR 71730 (33.204439, -92.613947)

City: El Dorado

County/Parish: Union

State: Arkansas



Photo File Name: R0010166

Orientation: W-NW

Date of Photo: 05/22/2024

Time of Photo: 1241

Latitude: 33.205617

Longitude: -92.616195

Photographer: Kerri McCabe

Description: Looking W-NW, this photo showed leachate from the bulked material inside the excavated pit at the facility.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 18

Location: MidAmerica Environmental Holdings, LLC – USA Disposal at 101 Warehouse Drive, El Dorado, AR 71730 (33.204439, -92.613947)		
City: El Dorado	County/Parish: Union	State: Arkansas



Photo File Name: R0010167

Orientation: W

Date of Photo: 05/22/2024

Time of Photo: 1241

Latitude: 33.205600

Longitude: -92.616209

Photographer: Kerri McCabe

Description: Looking W, this photo showed a closeup of the bulked material inside the excavated pit onsite.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 19

Location: MidAmerica Environmental Holdings, LLC – USA Disposal at 101 Warehouse Drive, El Dorado, AR 71730 (33.204439, -92.613947)

City: El Dorado

County/Parish: Union

State: Arkansas



Photo File Name: R0010168

Orientation: SW

Date of Photo: 05/22/2024

Time of Photo: 1243

Latitude: 33.205550

Longitude: -92.616683

Photographer: Kerri McCabe

Description: Looking SW, this photo showed bulked material and leachate adjacent to a wetland at the facility.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 20

Location: MidAmerica Environmental Holdings, LLC – USA Disposal at 101 Warehouse Drive, El Dorado, AR 71730 (33.204439, -92.613947)		
City: El Dorado	County/Parish: Union	State: Arkansas



Photo File Name: R0010169

Orientation: SW

Date of Photo: 05/22/2024

Time of Photo: 1243

Latitude: 33.205500

Longitude: -92.616933

Photographer: Kerri McCabe

Description: Looking SW, this photo showed bulked material and leachate discharged into the wetland at the facility. Algal growth was noted in the surface water.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 21

Location: MidAmerica Environmental Holdings, LLC – USA Disposal at 101 Warehouse Drive, El Dorado, AR 71730 (33.204439, -92.613947)		
City: El Dorado	County/Parish: Union	State: Arkansas



Photo File Name: R0010170

Orientation: SW

Date of Photo: 05/22/2024

Time of Photo: 1243

Latitude: 33.205469

Longitude: -92.616855

Photographer: Kerri McCabe

Description: Looking SW, this photo showed an additional view of the wetland in Photo No. 20.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 22

Location: MidAmerica Environmental Holdings, LLC – USA Disposal at 101 Warehouse Drive, El Dorado, AR 71730 (33.204439, -92.613947)		
City: El Dorado	County/Parish: Union	State: Arkansas



Photo File Name: R0010171

Orientation: SW

Date of Photo: 05/22/2024

Time of Photo: 1245

Latitude: 33.205083

Longitude: -92.616317

Photographer: Kerri McCabe

Description: Looking SW, this photo showed bulked material stockpiled onsite.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 23

Location: MidAmerica Environmental Holdings, LLC – USA Disposal at 101 Warehouse Drive, El Dorado, AR 71730 (33.204439, -92.613947)		
City: El Dorado	County/Parish: Union	State: Arkansas



Photo File Name: R0010174

Orientation: SE

Date of Photo: 05/22/2024

Time of Photo: 1248

Latitude: 33.204950

Longitude: -92.616100

Photographer: Kerri McCabe

Description: Looking SE, this photo showed bulked material land applied on top of the bare soil at the facility. The process area was observed in the background.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 24

Location: MidAmerica Environmental Holdings, LLC – USA Disposal at 101 Warehouse Drive, El Dorado, AR 71730 (33.204439, -92.613947)		
City: El Dorado	County/Parish: Union	State: Arkansas



Photo File Name: R0010175

Orientation: SW

Date of Photo: 05/22/2024

Time of Photo: 1250

Latitude: 33.204483

Longitude: -92.616117

Photographer: Kerri McCabe

Description: Looking SW, this photo showed bulked material adjacent to another wetland located on the facility. Dead vegetation was noted within the wetland.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 25

Location: MidAmerica Environmental Holdings, LLC – USA Disposal at 101 Warehouse Drive, El Dorado, AR 71730 (33.204439, -92.613947)		
City: El Dorado	County/Parish: Union	State: Arkansas



Photo File Name: R0010176

Orientation: SW

Date of Photo: 05/22/2024

Time of Photo: 1250

Latitude: 33.204483

Longitude: -92.616117

Photographer: Kerri McCabe

Description: Looking SW, this photo showed an additional view of the bulked material and dead vegetation within the wetland in Photo No. 24.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 26

Location: MidAmerica Environmental Holdings, LLC – USA Disposal at 101 Warehouse Drive, El Dorado, AR 71730 (33.204439, -92.613947)

City: El Dorado

County/Parish: Union

State: Arkansas



Photo File Name: R0010177

Orientation: SE

Date of Photo: 05/22/2024

Time of Photo: 1251

Latitude: 33.204483

Longitude: -92.616117

Photographer: Kerri McCabe

Description: Looking SW, this photo showed the stormwater pond utilized by the facility, which is permitted under NPDES permit ARR001445. Black color, hydrocarbon sheen, and odor were noted at the stormwater pond.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 27

Location: MidAmerica Environmental Holdings, LLC – USA Disposal at 101 Warehouse Drive, El Dorado, AR 71730 (33.204439, -92.613947)		
City: El Dorado	County/Parish: Union	State: Arkansas



Photo File Name: R0010178

Orientation: SW

Date of Photo: 05/22/2024

Time of Photo: 1251

Latitude: 33.204267

Longitude: -92.616017

Photographer: Kerri McCabe

Description: Looking SW, this photo showed an erosion gully formed in the stormwater pond levee directed to the receiving stream, unnamed tributary (UT) of Boggy Creek. Black staining was noted within the gully.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 28

Location: MidAmerica Environmental Holdings, LLC – USA Disposal at 101 Warehouse Drive, El Dorado, AR 71730 (33.204439, -92.613947)		
City: El Dorado	County/Parish: Union	State: Arkansas



Photo File Name: R0010179

Orientation: S-SW

Date of Photo: 05/22/2024

Time of Photo: 1251

Latitude: 33.204245

Longitude: -92.616017

Photographer: Kerri McCabe

Description: Looking S-SW, this photo showed an additional erosion gully in the stormwater pond levee directed toward the receiving stream (UT of Boggy Creek).



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 29

Location: MidAmerica Environmental Holdings, LLC – USA Disposal at 101 Warehouse Drive, El Dorado, AR 71730 (33.204439, -92.613947)		
City: El Dorado	County/Parish: Union	State: Arkansas



Photo File Name: R0010180

Orientation: SW

Date of Photo: 05/22/2024

Time of Photo: 1251

Latitude: 33.204181

Longitude: -92.616017

Photographer: Kerri McCabe

Description: Looking SW, this photo showed the erosion gully from Photo No. 28 leading to the receiving stream, UT of Boggy Creek.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 30

Location: MidAmerica Environmental Holdings, LLC – USA Disposal at 101 Warehouse Drive, El Dorado, AR 71730 (33.204439, -92.613947)

City: El Dorado

County/Parish: Union

State: Arkansas



Photo File Name: R0010182

Orientation: W-SW

Date of Photo: 05/22/2024

Time of Photo: 1252

Latitude: 33.204181

Longitude: -92.616017

Photographer: Kerri McCabe

Description: Looking W-SW, this photo showed the receiving stream (UT of Boggy Creek) immediately downstream of the erosion gullies in the stormwater pond levee. Unknown material, black staining, and odor were noted at the receiving stream.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 31

Location: MidAmerica Environmental Holdings, LLC – USA Disposal at 101 Warehouse Drive, El Dorado, AR 71730 (33.204439, -92.613947)

City: El Dorado

County/Parish: Union

State: Arkansas



Photo File Name: R0010183

Orientation: S

Date of Photo: 05/22/2024

Time of Photo: 1252

Latitude: 33.204181

Longitude: -92.616017

Photographer: Kerri McCabe

Description: Looking S, this photo showed two drainpipes for the stormwater pond. Both with shutoff valves and screw caps present, but the uppermost pipe was missing the screw cap and had an active leak. The two additional pipes, one in the vertical position and one crossing the receiving stream, are not connected or being used.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 32

Location: MidAmerica Environmental Holdings, LLC – USA Disposal at 101 Warehouse Drive, El Dorado, AR 71730 (33.204439, -92.613947)

City: El Dorado

County/Parish: Union

State: Arkansas



Photo File Name: R0010185

Orientation: S

Date of Photo: 05/22/2024

Time of Photo: 1252

Latitude: 33.204133

Longitude: -92.615983

Photographer: Kerri McCabe

Description: Looking S, this photo showed an active discharge from the uppermost drainpipe for the stormwater pond into the receiving stream (UT of Boggy Creek). Vertical pipe and pipe across the receiving stream are not connected or being used.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 33

Location: MidAmerica Environmental Holdings, LLC – USA Disposal at 101 Warehouse Drive, El Dorado, AR 71730 (33.204439, -92.613947)

City: El Dorado

County/Parish: Union

State: Arkansas



Photo File Name: R0010187

Orientation: W-SW

Date of Photo: 05/22/2024

Time of Photo: 1254

Latitude: 33.204115

Longitude: -92.615993

Photographer: Kerri McCabe

Description: Looking W-SW, this photo showed the lowermost drainpipe with a shutoff valve and the screw cap for one of the drainpipes in the receiving stream (UT of Boggy Creek). Vertical pipe and the pipe across the receiving stream are not connected or being used.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 34

Location: MidAmerica Environmental Holdings, LLC – USA Disposal at 101 Warehouse Drive, El Dorado, AR 71730 (33.204439, -92.613947)

City: El Dorado

County/Parish: Union

State: Arkansas



Photo File Name: R0010188

Orientation: S

Date of Photo: 05/22/2024

Time of Photo: 1254

Latitude: 33.204100

Longitude: -92.615983

Photographer: Kerri McCabe

Description: Looking S, this photo showed the condition of the receiving stream immediately upstream of the drainpipes for the stormwater pond. Unknown material, black staining, and odor were noted at the receiving stream.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 35

Location: MidAmerica Environmental Holdings, LLC – USA Disposal at 101 Warehouse Drive, El Dorado, AR 71730 (33.204439, -92.613947)

City: El Dorado

County/Parish: Union

State: Arkansas



Photo File Name: R0010191

Orientation: N-NW

Date of Photo: 05/22/2024

Time of Photo: 1256

Latitude: 33.204128

Longitude: -92.615810

Photographer: Kerri McCabe

Description: Looking N-NW, this photo showed an additional view of the stormwater pond utilized by the facility. Gas bubbles generated from the material in the stormwater pond were noted.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 36

Location: MidAmerica Environmental Holdings, LLC – USA Disposal at 101 Warehouse Drive, El Dorado, AR 71730 (33.204439, -92.613947)

City: El Dorado

County/Parish: Union

State: Arkansas



Photo File Name: R0010194

Orientation: SE

Date of Photo: 05/22/2024

Time of Photo: 1257

Latitude: 33.204150

Longitude: -92.615667

Photographer: Kerri McCabe

Description: Looking SE, this photo showed the clarity of the liquid in the drainage conveyance beside the receiving stream and directed toward the stormwater pond.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 37

Location: MidAmerica Environmental Holdings, LLC – USA Disposal at 101 Warehouse Drive, El Dorado, AR 71730 (33.204439, -92.613947)

City: El Dorado

County/Parish: Union

State: Arkansas



Photo File Name: R0010196

Orientation: W

Date of Photo: 05/22/2024

Time of Photo: 1259

Latitude: 33.203967

Longitude: -92.615283

Photographer: Kerri McCabe

Description: Looking W, this photo showed the drainage area imbedded within the process area at the facility.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 38

Location: MidAmerica Environmental Holdings, LLC – USA Disposal at 101 Warehouse Drive, El Dorado, AR 71730 (33.204439, -92.613947)		
City: El Dorado	County/Parish: Union	State: Arkansas



Photo File Name: R0010198

Orientation: NE

Date of Photo: 05/22/2024

Time of Photo: 1300

Latitude: 33.204021

Longitude: -92.615184

Photographer: Kerri McCabe

Description: Looking NE, this photo showed one of the concrete, bulk storage pits located onsite. All concrete, bulk storage pits are permitted under an Arkansas State No-Discharge (SND) permit (5077-WR-7), which expired May 31, 2021, and was administratively extended by the state.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 39

Location: MidAmerica Environmental Holdings, LLC – USA Disposal at 101 Warehouse Drive, El Dorado, AR 71730 (33.204439, -92.613947)		
City: El Dorado	County/Parish: Union	State: Arkansas



Photo File Name: R0010199

Orientation: NW

Date of Photo: 05/22/2024

Time of Photo: 1300

Latitude: 33.204067

Longitude: -92.615183

Photographer: Kerri McCabe

Description: Looking NW, this photo showed the piping at the holding pit viewed in Photo No. 38. Black staining, petroleum sheen, and flow indicators were noted in the process area.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 40

Location: MidAmerica Environmental Holdings, LLC – USA Disposal at 101 Warehouse Drive, El Dorado, AR 71730 (33.204439, -92.613947)		
City: El Dorado	County/Parish: Union	State: Arkansas



Photo File Name: R0010200

Orientation: N

Date of Photo: 05/22/2024

Time of Photo: 1301

Latitude: 33.204000

Longitude: -92.614900

Photographer: Kerri McCabe

Description: Looking N, this photo showed dead earthworms in the unknown liquid waste material on the ground at the facility.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 41

Location: MidAmerica Environmental Holdings, LLC – USA Disposal at 101 Warehouse Drive, El Dorado, AR 71730 (33.204439, -92.613947)		
City: El Dorado	County/Parish: Union	State: Arkansas



Photo File Name: R0010202

Orientation: E

Date of Photo: 05/22/2024

Time of Photo: 1302

Latitude: 33.204033

Longitude: -92.614667

Photographer: Kerri McCabe

Description: Looking E, this photo showed the building used for the storage of sawdust (bulking material).



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 42

Location: MidAmerica Environmental Holdings, LLC – USA Disposal at 101 Warehouse Drive, El Dorado, AR 71730 (33.204439, -92.613947)		
City: El Dorado	County/Parish: Union	State: Arkansas



Photo File Name: R0010203

Orientation: W-NW

Date of Photo: 05/22/2024

Time of Photo: 1303

Latitude: 33.204250

Longitude: -92.614933

Photographer: Kerri McCabe

Description: Looking W-NW, this photo showed a frac tank stored between two (2) subsurface, concrete pits. Sawdust (bulking material) and black liquid noted around the area.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 43

Location: MidAmerica Environmental Holdings, LLC – USA Disposal at 101 Warehouse Drive, El Dorado, AR 71730 (33.204439, -92.613947)		
City: El Dorado	County/Parish: Union	State: Arkansas



Photo File Name: R0010204

Orientation: W

Date of Photo: 05/22/2024

Time of Photo: 1303

Latitude: 33.204250

Longitude: -92.614933

Photographer: Kerri McCabe

Description: Looking W, this photo showed the subsurface, concrete pit to the left of the frac tank in Photo No. 42. Black liquid and sawdust (bulking material) were noted around the area.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 44

Location: MidAmerica Environmental Holdings, LLC – USA Disposal at 101 Warehouse Drive, El Dorado, AR 71730 (33.204439, -92.613947)

City: El Dorado

County/Parish: Union

State: Arkansas



Photo File Name: R0010205

Orientation: W-SW

Date of Photo: 05/22/2024

Time of Photo: 1303

Latitude: 33.204350

Longitude: -92.615067

Photographer: Kerri McCabe

Description: Looking W-SW, this photo showed the subsurface, concrete pit to the right of the frac tank in Photo No. 42. Unknown liquid waste was observed in the pit.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 45

Location: MidAmerica Environmental Holdings, LLC – USA Disposal at 101 Warehouse Drive, El Dorado, AR 71730 (33.204439, -92.613947)

City: El Dorado

County/Parish: Union

State: Arkansas



Photo File Name: R0010206

Orientation: NW

Date of Photo: 05/22/2024

Time of Photo: 1304

Latitude: 33.204400

Longitude: -92.615350

Photographer: Kerri McCabe

Description: Looking NW, this photo showed a large, concrete pit used for storing liquid wastes (contents unknown).



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 46

Location: MidAmerica Environmental Holdings, LLC – USA Disposal at 101 Warehouse Drive, El Dorado, AR 71730 (33.204439, -92.613947)		
City: El Dorado	County/Parish: Union	State: Arkansas



Photo File Name: R0010207

Orientation: W-NW

Date of Photo: 05/22/2024

Time of Photo: 1304

Latitude: 33.204400

Longitude: -92.615432

Photographer: Kerri McCabe

Description: Looking W-NW, this photo showed the available freeboard in the concrete pit in Photo No. 45.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 47

Location: MidAmerica Environmental Holdings, LLC – USA Disposal at 101 Warehouse Drive, El Dorado, AR 71730 (33.204439, -92.613947)

City: El Dorado

County/Parish: Union

State: Arkansas



Photo File Name: R0010208

Orientation: W-NW

Date of Photo: 05/22/2024

Time of Photo: 1304

Latitude: 33.204385

Longitude: -92.615478

Photographer: Kerri McCabe

Description: Looking W-NW, this photo showed an area of the concrete pit that had evidence of overflows. Overflows directed toward the stormwater pond onsite.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 48

Location: MidAmerica Environmental Holdings, LLC – USA Disposal at 101 Warehouse Drive, El Dorado, AR 71730 (33.204439, -92.613947)		
City: El Dorado	County/Parish: Union	State: Arkansas



Photo File Name: R0010209

Orientation: N-NE

Date of Photo: 05/22/2024

Time of Photo: 1305

Latitude: 33.204396

Longitude: -92.615476

Photographer: Kerri McCabe

Description: Looking N-NE, this photo showed another large, concrete pit used to catch leachate from bulked material. Soil used to make an earthen berm. An erosion gully was noted in the earthen berm with overflow directed toward the concrete pit in Photo No. 45.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 49

Location: MidAmerica Environmental Holdings, LLC – USA Disposal at 101 Warehouse Drive, El Dorado, AR 71730 (33.204439, -92.613947)		
City: El Dorado	County/Parish: Union	State: Arkansas



Photo File Name: R0010211

Orientation: E-NE

Date of Photo: 05/22/2024

Time of Photo: 1305

Latitude: 33.204550

Longitude: -92.615400

Photographer: Kerri McCabe

Description: Looking E-NE, this photo showed sawdust that had been bulked with liquid wastes partially undercover. Leachate drained to large, concrete pit from Photo No. 48.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 50

Location: MidAmerica Environmental Holdings, LLC – USA Disposal at 101 Warehouse Drive, El Dorado, AR 71730 (33.204439, -92.613947)		
City: El Dorado	County/Parish: Union	State: Arkansas



Photo File Name: R0010212

Orientation: SW

Date of Photo: 05/22/2024

Time of Photo: 1305

Latitude: 33.204667

Longitude: -92.615417

Photographer: Kerri McCabe

Description: Looking SW, this photo showed an additional view of the large, concrete pit in Photo No. 45. Black staining was noted outside the concrete pit.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 51

Location: MidAmerica Environmental Holdings, LLC – USA Disposal at 101 Warehouse Drive, El Dorado, AR 71730 (33.204439, -92.613947)

City: El Dorado

County/Parish: Union

State: Arkansas



Photo File Name: R0010213

Orientation: SE

Date of Photo: 05/22/2024

Time of Photo: 1305

Latitude: 33.204700

Longitude: -92.615333

Photographer: Kerri McCabe

Description: Looking SE, this photo showed bulk material partially covered with leachate drained toward concrete pit in Photo No. 48.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 52

Location: MidAmerica Environmental Holdings, LLC – USA Disposal at 101 Warehouse Drive, El Dorado, AR 71730 (33.204439, -92.613947)		
City: El Dorado	County/Parish: Union	State: Arkansas



Photo File Name: R0010214

Orientation: SE

Date of Photo: 05/22/2024

Time of Photo: 1306

Latitude: 33.204733

Longitude: -92.615333

Photographer: Kerri McCabe

Description: Looking SE, this photo showed bulked material with leachate.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 53

Location: MidAmerica Environmental Holdings, LLC – USA Disposal at 101 Warehouse Drive, El Dorado, AR 71730 (33.204439, -92.613947)		
City: El Dorado	County/Parish: Union	State: Arkansas



Photo File Name: R0010215

Orientation: SE

Date of Photo: 05/22/2024

Time of Photo: 1306

Latitude: 33.204708

Longitude: -92.615333

Photographer: Kerri McCabe

Description: Looking SE, this photo showed an additional view of the bulked material and leachate from Photo No. 52.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 54

Location: MidAmerica Environmental Holdings, LLC – USA Disposal at 101 Warehouse Drive, El Dorado, AR 71730 (33.204439, -92.613947)		
City: El Dorado	County/Parish: Union	State: Arkansas



Photo File Name: R0010216

Orientation: W-SW

Date of Photo: 05/22/2024

Time of Photo: 1307

Latitude: 33.204667

Longitude: -92.614583

Photographer: Kerri McCabe

Description: Looking W-SW, this photo showed an overview of the mixing area with unknown liquid wastes in frac tanks (photo left), and bulked material stockpiled.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 55

Location: MidAmerica Environmental Holdings, LLC – USA Disposal at 101 Warehouse Drive, El Dorado, AR 71730 (33.204439, -92.613947)		
City: El Dorado	County/Parish: Union	State: Arkansas



Photo File Name: R0010217

Orientation: S

Date of Photo: 05/22/2024

Time of Photo: 1320

Latitude: 33.204650

Longitude: -92.614517

Photographer: Kerri McCabe

Description: Looking S, this photo showed an overview of the bulking material (sawdust) storage area.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 56

Location: MidAmerica Environmental Holdings, LLC – USA Disposal at 101 Warehouse Drive, El Dorado, AR 71730 (33.204439, -92.613947)		
City: El Dorado	County/Parish: Union	State: Arkansas



Photo File Name: R0010218

Orientation: W

Date of Photo: 05/22/2024

Time of Photo: 1320

Latitude: 33.204517

Longitude: -92.614483

Photographer: Kerri McCabe

Description: Looking W, this photo showed leachate drained from bulked material; frac tanks (photo left) with unknown liquid wastes.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 57

Location: MidAmerica Environmental Holdings, LLC – USA Disposal at 101 Warehouse Drive, El Dorado, AR 71730 (33.204439, -92.613947)

City: El Dorado

County/Parish: Union

State: Arkansas

USA Disposal Services LLC
MATERIAL / WASTE TRANSFER FORM
NE U12732

Date 5-22-24 Time In 11:45 AM Time Out _____

CARRIER INFORMATION
Carrier's Name Code 3 BOL # _____
Truck # _____ Trailer # _____

GENERATOR INFORMATION ☐ Same as Carrier
Generator Name _____
City _____ State _____

VOLUME
☐ Barrels
☒ Gallons 4000
☐ Yards
☐ Washout Service _____ hours

IS THIS E&P WASTE?
☐ YES
☐ NO

E&P INFORMATION
Lease Name _____ Lease # _____
Field Name _____
Well Name & # _____
County/Parish _____

MATERIAL INFORMATION ☒ Incoming ☐ Outgoing
☐ Water Based Mud ☐ Washout Water
☐ Oil Based Mud ☐ Pipeline Water
☐ Cuttings ☐ Storage Tank Sludge
☐ Completion Fluids ☐ Salt Water
☐ Pit Water ☐ RO Treated Water
☐ Surface Water ☐ Treated Water
☐ Production Fluids ☐ Bulk Material
☐ Flowback ☐ Sawdust/Chips
☐ Industrial Wastewater ☐ Leachate
☐ Other Gas & Water Mixture

OUTGOING INFORMATION (if applicable)
☐ Hutcheson
☐ USA Disposal Services
☐ City Wastewater
☐ Landfill
City _____ ST _____
☐ Other _____

DRIVER - Print Name Patrick Campbell DRIVER - Signature [Signature]
Operator - Print Name Logan Black Operator - Signature [Signature]

OFFICE USE ONLY:
BBLS _____ GAL _____ PRICE PER UNIT _____ TOTAL \$ _____
COMMENTS: _____

USA Disposal Services LLC
101 Warehouse Dr El Dorado AR 71730
Mailing: 4101 Old Oak Dr Little Rock AR 72212

Sales: Buddy L Hall
bhall@midamerica-holdings.com
870-814-0264

Office: Justin Watts
jwatts@midamerica-holdings.com
501-490-8893

MAY 22 2024 13:23

Photo File Name: R0010219

Orientation: S-SW

Date of Photo: 05/22/2024

Time of Photo: 1323

Latitude: 33.204267

Longitude: -92.614117

Photographer: Kerri McCabe

Description: Looking S-SW, this photo showed an incomplete "Material / Waste Transfer Form" for an incoming truck.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 58

Location: MidAmerica Environmental Holdings, LLC – USA Disposal at 101 Warehouse Drive, El Dorado, AR 71730 (33.204439, -92.613947)

City: El Dorado

County/Parish: Union

State: Arkansas

**CODE 3
SERVICES, LLC**

BILL OF LADING					
TELEPHONE NUMBER:		JOB #		DOCUMENT #	
RESPONSE SITE ADDRESS: 1414 Parkway Dr Crossett, AR 71635				Bill To:	
CARRIER 1 COMPANY NAME: Code 3 Services, LLC		US EPA ID NUMBER: AR000026013		STATE ID: AR	CARRIER'S PHONE NUMBER: 870-313-2131
RECEIVING FACILITY NAME AND SITE ADDRESS: USA Disposal Industrial Rd El Dorado, AR 71730				FACILITY PHONE NUMBER:	
				FACILITY CONTACT:	
HM	US DOT PROPER SHIPPING NAME & ADDITIONAL DESCRIPTORS	CONTAINERS NUMBER	TYPE	TOTAL QUANTITY	UNIT WEIGHT / VOLUME
a.	Gas + Water Mix			4000 gal	
b.					
c.					
d.					
e.					

MAY 22 2024 13:24

Photo File Name: R0010220

Orientation: S-SW

Date of Photo: 05/22/2024

Time of Photo: 1324

Latitude: 33.204267

Longitude: -92.614117

Photographer: Kerri McCabe

Description: Looking S-SW, this photo showed a Bill of Lading from Code 3 Services, LLC.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 59

Location: MidAmerica Environmental Holdings, LLC – USA Disposal at 101 Warehouse Drive, El Dorado, AR 71730 (33.204439, -92.613947)

City: El Dorado

County/Parish: Union

State: Arkansas



Photo File Name: R0010221

Orientation: E-SE

Date of Photo: 05/22/2024

Time of Photo: 1326

Latitude: 33.203617

Longitude: -92.613833

Photographer: Kerri McCabe

Description: Looking E-SE, this photo showed the receiving stream (UT of Boggy Creek) east of the culvert under Industrial Road upstream of the facility. Characteristics were typical of an intermittent, urban stream with no petroleum sheen or odor, and aquatic biota were present.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 60

Location: MidAmerica Environmental Holdings, LLC – USA Disposal at 101 Warehouse Drive, El Dorado, AR 71730 (33.204439, -92.613947)		
City: El Dorado	County/Parish: Union	State: Arkansas



Photo File Name: R0010222

Orientation: W-NW

Date of Photo: 05/22/2024

Time of Photo: 7

Latitude: 33.203617

Longitude: -92.613833

Photographer: Kerri McCabe

Description: Looking W-NW, this photo showed the receiving stream (UT of Boggy Creek) west of the culvert under Industrial Road upstream of the facility. Characteristics were typical of an intermittent, urban stream with no petroleum sheen or odor, and aquatic biota were present.

Appendix 2
Industrial Stormwater General Permit
Inspection Check Sheet
Pages 1 - 3

Inspection Form Legend: S-Satisfactory, M-Marginal, U-Unsatisfactory, Y-Yes, N-No, NI-Not Implemented, NA-Not Applicable, NE-Not Evaluated.
If Y and a NI are checked it means it is in the SWPPP but not implemented in the field which is a violation.

SECTION A: SWPPP & SITE MAP REVIEW		☐ S	☐ M	☒ U	☐ NA	☐ NE
1. Is the SWPPP available for review by ADEQ (Part 4.4)?		☒ Y	☐ N	☐ NI	☐ NA	☐ NE
A. If yes, when was the SWPPP last updated? May 2015						
2. Does the SWPPP identify specific individuals or positions as members of the Pollution Prevention Team, and does it outline the responsibilities of each team member (Part 4.2.2)?		☒ Y	☐ N	☐ NI	☐ NA	☐ NE
A. If yes, are the team members and positions current?		☐ Y	☒ N	☐ NI	☐ NA	☐ NE
3. Is the facility Site Map available for review (Part 4.2.3)?		☒ Y	☐ N	☐ NI	☐ NA	☐ NE
A. If yes, does the site map contain the following items, if applicable?						
i. The size of the property.		☒ Y	☐ N	☐ NI	☐ NA	☐ NE
ii. The location and extent of significant structures and impervious surfaces.		☒ Y	☐ N	☐ NI	☐ NA	☐ NE
iii. The direction of stormwater flow (ex. use of arrows, topographical maps).		☒ Y	☐ N	☐ NI	☐ NA	☐ NE
iv. The locations of all existing structural control measures.		☒ Y	☐ N	☐ NI	☐ NA	☐ NE
v. The locations of all receiving waters in the immediate vicinity of the facility.		☐ Y	☒ N	☐ NI	☐ NA	☐ NE
vi. The locations of all stormwater conveyances including ditches, pipes, and swales.		☒ Y	☐ N	☐ NI	☐ NA	☐ NE
vii. The locations of potential pollutant sources.		☒ Y	☐ N	☐ NI	☐ NA	☐ NE
viii. Locations of all stormwater monitoring points.		☒ Y	☐ N	☐ NI	☐ NA	☐ NE
ix. The locations of stormwater inlets and outfalls.		☒ Y	☐ N	☐ NI	☐ NA	☐ NE
x. Where the stormwater discharges to Municipal Separate Storm Sewer System (MS4).		☐ Y	☒ N	☐ NI	☐ NA	☐ NE
xi. The locations and descriptions of allowable non-stormwater discharges identified in the SWPPP.		☒ Y	☐ N	☐ NI	☐ NA	☐ NE
xii. The locations of the following activities if they are exposed to precipitation.		☐ Y	☐ N	☐ NI	☐ NA	☐ NE
a. Fueling Stations		☐ Y	☐ N	☐ NI	☒ NA	☐ NE
b. Vehicle and equipment maintenance and/or cleaning areas		☐ Y	☐ N	☐ NI	☒ NA	☐ NE
c. Loading and unloading areas		☒ Y	☐ N	☐ NI	☐ NA	☐ NE
d. Locations used for the treatment, storage, or disposal of waste		☒ Y	☐ N	☐ NI	☐ NA	☐ NE
e. Liquid storage tanks		☐ Y	☒ N	☐ NI	☐ NA	☐ NE
f. Processing and storage areas		☒ Y	☐ N	☐ NI	☐ NA	☐ NE
g. Immediate access roads and rail lines used or traveled by carriers of raw materials, manufactured products, waste materials, or byproducts used or created by the facility.		☒ Y	☐ N	☐ NI	☐ NA	☐ NE
h. Transfer areas for substances in bulk		☒ Y	☐ N	☐ NI	☐ NA	☐ NE
i. Locations of storage piles containing salt used for deicing or other commercial or industrial purposes.		☐ Y	☐ N	☐ NI	☒ NA	☐ NE
xiii. The locations and sources of run-on to the site from adjacent property that contains significant quantities of pollutants (Part 4.2.3.13)?		☐ Y	☒ N	☐ NI	☐ NA	☐ NE
4. Does the stormwater discharge from the facility enter a waterbody that is listed on the most recently approved 303(d) list or has an approved TMDL?		☒ Y	☐ N	☐ NI	☐ NA	☐ NE
A. If yes, provide the name of the waterbody. UT of Boggy Creek, thence Boggy Creek, thence Bayou De Loutre, to Ouachita River; both Bayou De Loutre and Ouachita River						
5. Does the SWPPP address one or more of the measures listed in Part 4.2.7.1.1 – 4?		☐ Y	☒ N	☐ NI	☐ NA	☐ NE
A. If yes, describe the measures identified in the SWPPP.						
6. Does the stormwater from the facility directly discharge to an ERW, NSW, or ESW?		☐ Y	☒ N	☐ NI	☐ NA	☐ NE
A. If yes, provide the name of the waterbody.						
B. Does the SWPPP document the name of the listed waterbody and the approximate distance between the outfall and the listed waterbody?		☐ Y	☒ N	☐ NI	☐ NA	☐ NE
i. If yes, provide the approximate distance between the waterbody and the outfall(s) (Part 4.2.7.2.1).						
C. Does the SWPPP incorporate additional BMPs needed to prevent to the maximum extent practicable exposure of pollutants to stormwater that could potentially impact water quality?		☐ Y	☒ N	☐ NI	☐ NA	☐ NE
i. If yes, describe each BMP that is implemented.						

Comments: <u>SWPPP is from May 2015 (viewed through ADEQ PDS); not updated.</u> <u>Wetlands not identified in the SWPPP or on the site map.</u>	
SECTION B: MONITORING, INSPECTIONS, and RECORD KEEPING	" S " M ☒ U " NA " NE
1. Provide the Sector/Sub-Sector listed for the facility. <u>I1</u>	
2. How many permitted outfalls are identified in the SWPPP? <u>One (1) - 001</u>	
3. Are any outfalls considered similar?	" Y " N " NI ☒ NA " NE
4. Are samples being collected from the location(s) specified in the permit?	" Y ☒ N " NI " NA " NE
5. Is the sample location(s) suitable for the collection of representative samples?	☒ Y " N " NI " NA " NE
A. If no, describe why the sample location(s) is not suitable.	
6. Please list the benchmark parameters that are required to be sampled for under the Sector/Sub-Sector? <u>TSS, pH, and COD</u>	
7. Are all benchmark parameters being sampled and analyzed at least annually (Part 3.4)?	" Y ☒ N " NI " NA " NE
8. Was all collected benchmark parameter samples properly preserved and analyzed (Part 3.8.2.5)?	" Y " N " NI ☒ NA " NE
9. Did sampling reveal any exceedances of benchmark parameters?	" Y " N " NI ☒ NA " NE
A. If yes, was a process to develop a Corrective Action Plan started within 30 days of the exceedance(s)(Part 3.11.1)?	" Y " N " NI ☒ NA " NE
B. If yes, was the exceedance attributed to a natural background pollutant level?	" Y " N " NI ☒ NA " NE
i. If yes, has the Department been notified?	" Y " N " NI ☒ NA " NE
10. Are at least 4 visual site inspections conducted annually (Part 5.1.1)?	" Y ☒ N " NI " NA " NE
B. If yes, do the inspections include the following:	" Y " N " NI " NA " NE
i. Date of the inspection	" Y " N " NI ☒ NA " NE
ii. Personnel conducting the inspection	" Y " N " NI ☒ NA " NE
iii. Major observations	" Y " N " NI ☒ NA " NE
iv. Summary of actions taken as a result of the inspection	" Y " N " NI ☒ NA " NE
C. Did at least one inspection occur during a period when stormwater was discharging (Part 5.1)?	" Y " N " NI ☒ NA " NE
i. If yes, provide the date when the inspection occurred.	
11. Was a Comprehensive Site Compliance Evaluation conducted each year (Part 5.1.2)?	" Y " N " NI ☒ NA " NE
A. If yes, provide the date when the inspection occurred. <u>N/A</u>	
12. Was a Storm Water Annual Report (SWAR) for the previous monitoring period(s) completed?	" Y ☒ N " NI " NA " NE
A. If yes, is the information provided on the SWAR accurate?	" Y " N " NI ☒ NA " NE
B. If yes, is the SWAR signed by the Responsible Official or Cognizant Official?	" Y " N " NI ☒ NA " NE
13. Is the permittee retaining all records according to Part 5.2 of the permit?	" Y ☒ N " NI " NA " NE
Comments: <u>No sampling conducted.</u> <u>No inspections conducted.</u>	
SECTION C: FACILITY TOUR	" S " M ☒ U " NA " NE
1. Are the number and location of all outfalls accurate as described in the permit, SWPPP, and site map?	☒ Y " N " NI " NA " NE
2. Are there any allowable non-stormwater discharges that are not identified in the SWPPP?	" Y ☒ N " NI " NA " NE
3. Are there any non-stormwater discharges occurring that are not allowed in the permit?	☒ Y " N " NI " NA " NE
4. Has notification been given to the EPA or DEQ of any new, different, or increased discharges?	" Y ☒ N " NI " NA " NE
5. Are all discharges from this facility permitted, both stormwater and non-stormwater?	" Y ☒ N " NI " NA " NE
6. Is there evidence of spills or leaks that have not been properly remediated as required by the SWPPP?	☒ Y " N " NI " NA " NE
7. Is there evidence of erosion occurring or are there areas where the ground is not stabilized?	☒ Y " N " NI " NA " NE
8. Are there stormwater controls, or other structures or storage areas present that are not identified in the SWPPP or on the site map?	☒ Y " N " NI " NA " NE
9. Are the BMPs properly operated, installed, and/or maintained?	" Y ☒ N " NI " NA " NE
10. Are housekeeping procedures being implemented and are those procedures adequate?	" Y ☒ N " NI " NA " NE

Comments:

- Stormwater pond contains unknown liquid wastes; discharge at pipe.
- Overflow of process storage ponds; releases noted around property.
- Disturbed areas due to landfilling and land application of bulked wastes.
- Wetlands with placed fill.
- Additional frac tanks onsite.
- Solid waste dumpster onsite.
- Laydown yard in two different locations.
- Portable toilet onsite.