

Region 6 - Enforcement & Compliance Assurance Division
INSPECTION REPORT

Inspection Date(s):	05/09/2024	
Media Program:	Water (CWA)	
Regulatory Program(s)	Water (CWA) Brine Program (Oil & Gas inspection)	
Company Name:	LANXESS Corporation – South Plant	
Facility Name:	SWD Trimble 9S (Class II injection well at 33.105418, -92.710991)	
Facility Physical Location:	324 Southfield Cutoff	
(city, state, zip code)	El Dorado, AR 71730	
Mailing address:	2226 Haynesville Hwy	
(city, state, zip code)	El Dorado, AR 71730	
County/Parish:	Union County	
Facility Phone Number	870-862-5141	
Facility Contact:	Rodger Fulco (870-864-1570)	Head of Brine Production
	Rodger.Fulco@lanxess.com	
FRS Number:	N/A	
Identification/Permit Number:	ARU002249; ADEQ AFIN 70-00037 for AR0000680, ARR001376, 5048-WR-2, 5175-WR-1, and 0010-UR-4	
Media Identifier Number:	N/A	
NAICS:	325998	
SIC:	2899	
Personnel participating in inspection:		
Kerri McCabe (lead)	EPA / Region 6 ECDW	Inspector / Enforcement Officer
Michael Blaha	EPA / Region 6 ECDW	Inspector / Enforcement Officer
Rodger Fulco	LANXESS Corporation	Head of Brine Production, South Arkansas
Kimberly Shurtleff	LANXESS Corporation	Head of Manufacturing, South Arkansas
EPA Lead Inspector Signature/Date	KERRI MCCABE	Digitally signed by KERRI MCCABE Date: 2024.06.11 08:20:18 -05'00'
	Kerri McCabe	Date
Supervisor Signature/Date		
	Michael Blaha (acting)	Date

Section I – INTRODUCTION

PURPOSE OF THE INSPECTION

EPA Region 6 inspectors Kerri McCabe (lead) and Michael Blaha arrived at the LANXESS Corporation – South Plant / SWD Trimble 9S release site, located off Southfield Cutoff at 33.105418, -92.710991; at 0830 on 05/09/2024 for an announced inspection. Mr. Rodger Fulco, LANXESS Corporation, 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. 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 LANXESS Corporation – South Plant / SWD Trimble 9S injection well in response to a complaint submitted to the U.S. EPA Office of the Inspector General in August 2023. The SWD Trimble 9S is a Class II injection well utilized for the disposal of tail brine.

Section II - OBSERVATIONS

I observed the area of the August 2023 tail brine release, see Appendix 1 (Photograph Log), see Photo No. 1. For additional GPS location and photo metadata, see Appendix 1.

I observed an earthen berm that had been constructed to contain the tail brine release, see Photo No. 2.

I observed an area on private property with standing dead trees, see Photo No. 3.

I observed the injection well pad, see Photo No. 4.

I observed the repaired section of line for the injection well, see Photo No. 5.

I observed a privately-owned utility Right of Way (ROW) that had been cleared of trees, see Photo No. 6.

Section III – AREAS OF CONCERN

A closing conference was held with Mr. Rodger Fulco with LANXESS Corporation during the inspection. Mr. Fulco explained that LANXESS Corporation had worked with the adjacent property owner regarding the impacted trees. Furthermore, Mr. Fulco explained that a privately-owned utility had removed trees along the ROW, and this activity was not related to the release of tail brine. The ruptured tail brine line had been repaired. There were no areas of concern at the time of the inspection.

Section IV – FOLLOW UP

There were no areas of concern during the inspection, and a follow-up inspection is not required at this time.

Section V – LIST OF APPENDICES

Appendix 1 – Photograph Log – 6 photos taken 05/09/2024.

Appendix 1

Photograph Log 6 Photos



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 1

Location: LANXESS Corporation – South Plant – SWD Trimble 9 S from Hwy 82W, to State Hwy 4 (Haynesville Hwy), to State Hwy 7, to Southfield Cutoff at 33.105418, -92.710991.

City: El Dorado

County/Parish: Union

State: Arkansas



Photo File Name: IMG_0002

Orientation: SW

Date of Photo: 05/09/2024

Time of Photo: 0912

Latitude: 33.105000

Longitude: -92.712631

Photographer: Kerri McCabe

Description: Looking SW, this photo showed the earthen berm built to contain the release of tail brine.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 2

Location: LANXESS Corporation – South Plant – SWD Trimble 9 S from Hwy 82W, to State Hwy 4 (Haynesville Hwy), to State Hwy 7, to Southfield Cutoff at 33.105418, -92.710991.

City: El Dorado

County/Parish: Union

State: Arkansas



Photo File Name: IMG_0003

Orientation: S

Date of Photo: 05/09/2024

Time of Photo: 0915

Latitude: 33.105092

Longitude: -92.712669

Photographer: Kerri McCabe

Description: Looking S, this photo showed another view of the earthen berm used to collect the tail brine released.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 3

Location: LANXESS Corporation – South Plant – SWD Trimble 9 S from Hwy 82W, to State Hwy 4 (Haynesville Hwy), to State Hwy 7, to Southfield Cutoff at 33.105418, -92.710991.		
City: El Dorado	County/Parish: Union	State: Arkansas



Photo File Name: IMG_0004

Orientation: S

Date of Photo: 05/09/2024

Time of Photo: 0920

Latitude: 33.105033

Longitude: -92.711481

Photographer: Kerri McCabe

Description: Looking S, this photo showed the SWD pad with dead vegetation from the brine release in the background on private property.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 4

Location: LANXESS Corporation – South Plant – SWD Trimble 9 S from Hwy 82W, to State Hwy 4 (Haynesville Hwy), to State Hwy 7, to Southfield Cutoff at 33.105418, -92.710991.		
City: El Dorado	County/Parish: Union	State: Arkansas



Photo File Name: IMG_0005

Orientation: NE

Date of Photo: 05/09/2024

Time of Photo: 0921

Latitude: 33.105055

Longitude: -92.711444

Photographer: Kerri McCabe

Description: Looking NE, this photo showed the overview of the tail brine injection well where the release had occurred.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 5

Location: LANXESS Corporation – South Plant – SWD Trimble 9 S from Hwy 82W, to State Hwy 4 (Haynesville Hwy), to State Hwy 7, to Southfield Cutoff at 33.105418, -92.710991.		
City: El Dorado	County/Parish: Union	State: Arkansas

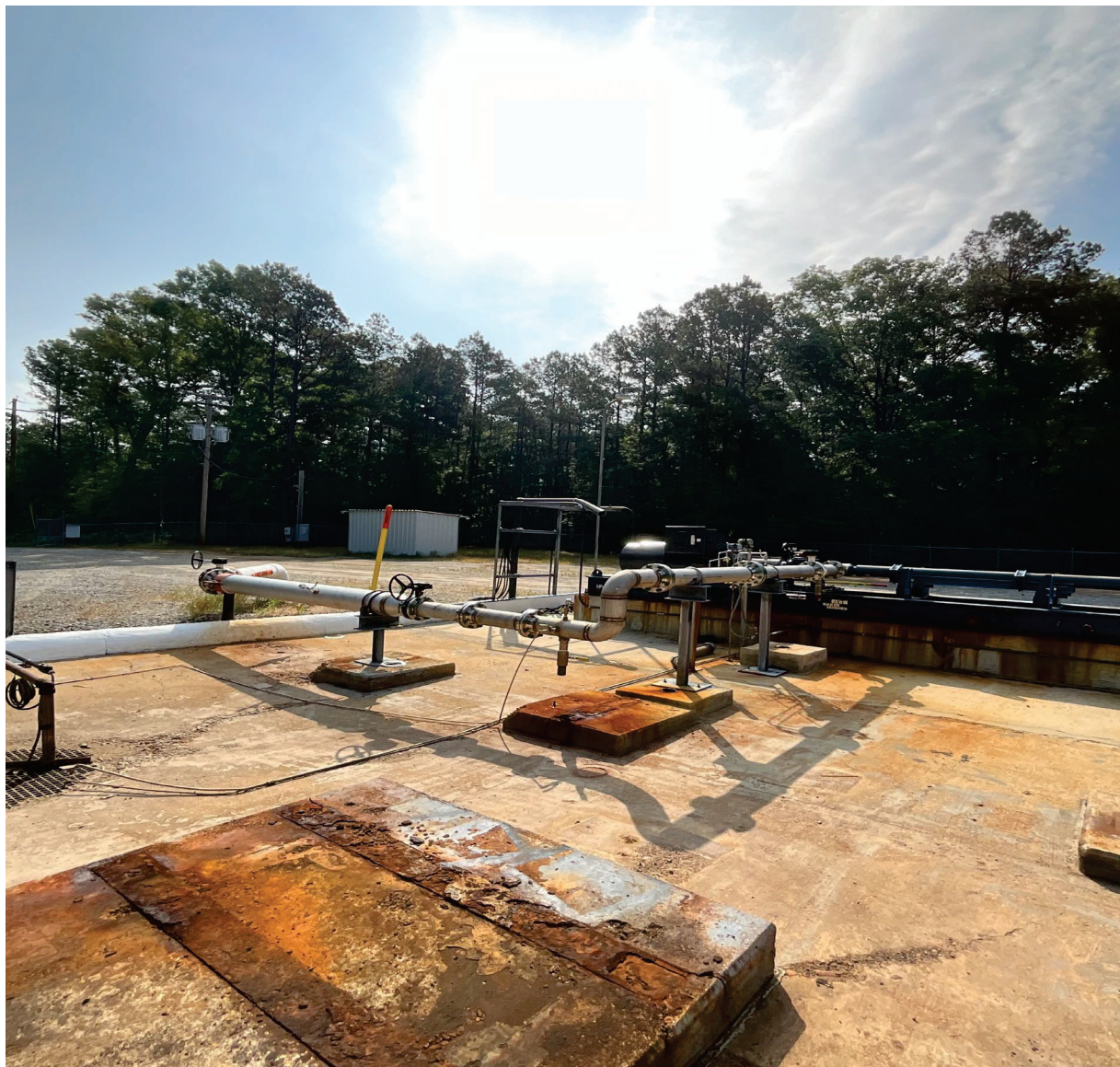


Photo File Name: IMG_0006

Orientation: E

Date of Photo: 05/09/2024

Time of Photo: 0923

Latitude: 33.105265

Longitude: -92.711406

Photographer: Kerri McCabe

Description: Looking E, this photo showed the section of the line that was replaced after the release.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 6

Location: LANXESS Corporation – South Plant – SWD Trimble 9 S from Hwy 82W, to State Hwy 4 (Haynesville Hwy), to State Hwy 7, to Southfield Cutoff at 33.105418, -92.710991.		
City: El Dorado	County/Parish: Union	State: Arkansas



Photo File Name: IMG_0007

Orientation: NE

Date of Photo: 05/09/2024

Time of Photo: 0929

Latitude: 33.105553

Longitude: -92.710931

Photographer: Kerri McCabe

Description: Looking NE, this photo showed the Right of Way (ROW) cleared by private utility company.