

NPDES Stormwater Industrial and Construction Inspection Report

National Database Information	
Inspection Date: 03/04/2025	Entry/Exit Time: 9:00/15:00
NPDES ID Number: COR05I301	Inspection ID: 202503_COR05I301
Facility Type: Gas Processing Plant	Inspection Type: Stormwater Industrial
SIC Code: 1321 Natural Gas Liquids	
Lead Inspector/Affiliation/Telephone: Kevin Stockton/ERG/720-789-8050	
Inspector/Affiliation/Telephone: Shannon Egger/ERG/703-633-1600	
Inspector/Affiliation/Telephone: Geoff Hensgen/Southern Ute Indian Tribe/970-563-3111	

Facility Location Information	
Site/Facility and Location: Ignacio Gas Plant 3746 Country Road 307 Durango, Colorado 81303 La Plata County	Mailing address: Harvest Four Corners, LLC 1755 Arroyo Dr, Bloomfield, New Mexico 87413
Latitude: 37.1442779 ° N	Longitude: -107.7864066 ° W
Receiving Water(s):	Unnamed tributary to Florida River
Impaired waters:	No

Contact Information	
	Name and Title
Permittee (owner):	Harvest Four Corners, LLC
Co-Permittee:	N/A
Authorized Official:	Mike Perkerewicz, Facility Foreman
Facility Contact(s):	Monica Smith, Environmental Specialist
	Chad Snell, Environmental Specialist – Contractor
Facility Operator:	Nathan Work, Operations Manager

Industrial Permit Information	
Date NOI Submitted: 05/25/2021	Copy of NOI on site: Yes
SWPPP on site: Yes	SWPPP Satisfactory: No (refer to Finding 1)
SWPPP Implementation Satisfactory: No (refer to Findings 2-5)	<i>Satisfactory SWPPP must be current and complete</i>
Permit Effective Date: 06/24/2021	Expiration Date: 02/28/2026

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Areas Evaluated During Inspection		
<u>Permit</u>	<u>Self-Monitoring Program</u>	Flow Measurement
<u>Records</u>	Compliance Schedule	<u>Pollution Prevention</u>
<u>Facility Site Review</u>	Laboratory	<u>Stormwater</u>
Effluent/Receiving Waters	<u>Operations and Maintenance</u>	No Exposure

Report Review and Signature		
Inspector Signature/Name	Address/Phone Number	Date
	ERG Golden Office 1113 Washington Avenue Suite 300 Golden, CO 80401	3/25/2025 (Draft) 4/15/2025 (Final)
Kevin Stockton	720-789-8050	
Reviewer Signature/Name	Address/Phone Number	Date
	U.S. EPA Region 8 1595 Wynkoop Street 8ECA-W-N Denver, Colorado 80202	3/26/2025
Stephanie Meyers	303-312-6938	
Supervisor Signature/Name	Address/Phone Number	Date
EMILIO LLAMOZAS Digitally signed by EMILIO LLAMOZAS Date: 2025.04.17 15:25:19 -06'00'	U.S. EPA Region 8 1595 Wynkoop Street 8ECA-W-N Denver, Colorado 80202	04/09/2025
Emilio Llamozas	303-312-6407	

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Inspection Narrative, Facility and Industrial Activity Description

The inspection was conducted at the Harvest Four Corners, LLC (Permittee) Ignacio Gas Plant (Facility) located within the Southern Ute Reservation near Durango, Colorado. The EPA is responsible for implementing the National Pollutant Discharge Elimination System (NPDES) program in Indian Country within the State of Colorado. The focus of the inspection was to determine the Permittee's compliance with its NPDES Multi-Sector General Permit (MSGP) for Stormwater Discharges Associated with Industrial Activity (NPDES Permit number COR05I301). EPA announced the Inspection to the Permittee via phone and email on February 19, 2025.

On March 4, 2025, at approximately 9:00 AM, the U.S. Environmental Protection Agency (EPA) contracted inspectors from Eastern Research Group (ERG), Kevin Stockton and Shannon Egger, as well as Geoff Hensgen, Water Quality Manager from the Southern Ute Indian Tribe (collectively, the Inspection Team) arrived at the Facility. After completing the required safety training, the Inspection Team met with Facility representatives Monica Smith (Environmental Specialist), Mike Perkerewicz (Plant Foreman), Nathan Work (Operations Manager), and Chad Snell (Environmental Specialist Contractor). The Inspection Team and Facility representatives began with an opening conference to make introductions and discuss the purpose of the inspection. Kevin Stockton of ERG presented his EPA-issued Clean Water Act (CWA) Inspector Credential.

The Facility is operated by Harvest Four Corners, LLC and provides compression, conditioning, and processing for natural gas recovered in the San Juan Gathering System, which spans the southwest corner of Colorado and the northwest corner of New Mexico. The Facility conditions approximately 500 to 600 million standard cubic feet of field gas per day (MMscfd) into saleable gas liquids and residue gas. The primary plant operations include inlet compression, dehydration, carbon dioxide removal, natural gas liquid (NGL) removal, fractionation, and storage. NGLs are transported off-site via pipelines and tanker trucks. Y-grade ethane is transported off-site in a dedicated pipeline. The loading of the remaining NGLs occurs through loading racks. There are two propane loading racks, one butane loading rack, and two natural gasoline loading racks. The Ignacio Warehouse is located in the west area of the Facility and receives shipments for plant operations. Various potential stormwater pollutants (petroleum products, amine, bleach) used in the Facility's natural gas processing operations are stored in tanks within secondary containment basins throughout the Facility. The Permittee implements a Spill Prevention, Control, and Countermeasure (SPCC) Plan for bulk chemicals stored at the Facility. Most of the Facility is unpaved (a combination of gravel, rock, and dirt) and there is a general grade from north to south.

The Facility manages industrial wastewater through a system of evaporation ponds permitted by the Colorado Oil and Gas Conservation Commission. The Clear Water Pond in the south-central area of the Facility contains fresh water, pumped from the Florida River, to be used in plant processes and is dredged approximately every 3 years. The Permittee stores dredged material in a Soil Drying Containment area in the east area of the Facility (refer to [Appendix A, Photographs 1, 2, and 3](#)). The East Excess Pond contains cooling tower blow down, boiler blow down, and reverse osmosis reject

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Inspection Narrative, Facility and Industrial Activity Description

water before it is pumped to the Evaporation ponds in the south area of the Facility (refer to Appendix A, Photograph 4). Industrial wastewater is stored in two above-ground storage tanks in the east area of the Facility (refer to Appendix A, Photographs 5 and 6). These tanks are emptied daily and wastewater is hauled offsite for disposal by a third-party contractor.

The Inspection Team reviewed the Facility Stormwater Pollution Prevention Plan (SWPPP), site map, industrial stormwater self-inspection records, and stormwater training documents. Weekly industrial stormwater inspections were reviewed for first, second, and third quarters in 2024. Quarterly visual inspections were reviewed for the first, second, and third quarters in 2024. Operator training logs and slide decks were reviewed for 2024. Discharge monitoring reports and laboratory sample analysis results were reviewed for January 2024 through January 2025. Two discharge events occurred in the period of review, one on June 22, 2024 and one on September 17, 2024. Both samples were collected from sample point 5 which is located upgradient from Outfall IGP-011. The Inspection Team confirmed that the sample analysis results were correctly reported on the corresponding June and September 2024 DMRs. Facility representatives stated that samples were unable to be taken from the other outfalls due to insufficient flow.

The Inspection Team, accompanied by Facility representatives, conducted a walkthrough of the Facility starting at Outfall IGP-012 along the northern side of the Office and Control Room (refer to Appendix A, Photographs 7 and 8). From there, the Inspection Team and Facility representatives proceeded clockwise around the Facility perimeter, observing Gosney Pond, stormwater drainage pathways, and storage areas in the northwest corner of the Facility. Then, the Inspection Team and Facility representatives observed the stormwater drainage pathways along the Facility's north perimeter and storage areas in Drainage Areas 4 and 5. Next, the Inspection Team and Facility representatives observed stormwater outfalls, storage areas, and control measures in Drainage Area 15. Then, the Inspection Team and Facility representatives observed the boneyard area in Drainage Area 6, stormwater drainage pathways in Drainage Area 9, the East and West Excess Ponds in drainage area 12, and Outfall IGP-009 in Drainage Area 11. Next, the Inspection Team and Facility representatives observed the Facility perimeter around the North and South Evaporation Ponds including Outfall IGP-011. To conclude the Facility walkthrough, the Inspection Team and Facility representatives observed the North Evaporation Stormwater Holding Pond, as well as the industrial process areas, stormwater drainage pathways, and control measures in Drainage Areas 7 and 8. Photographs of the above-described areas are referenced from Appendix A as applicable in the Findings, Corrective Actions and Recommendations Section of this report.

After the Facility walkthrough, preliminary findings were discussed during a closing conference with Mr. Hensgen, Ms. Smith, Mr. Perkerewicz, Mr. Work, and Mr. Snell. Facility Operators, Tommy Novotny and Tyler Whitt, also joined for the closing conference. Additional documents, including a revised version of the SWPPP, weekly and quarterly inspection reports for the third quarter of 2024, and the operator training logs were requested to be emailed to the inspectors following the inspection. The Inspection Team left the Facility at 15:00.

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Findings, Corrective Actions and Recommendations

Finding 1:

The Permittee's SWPPP site map did not contain all elements required by the Permit. Specifically, the SWPPP map did not contain the locations of:

- a. All stormwater conveyances including ditches, pipes, and swales. For example, the site map does not show all ditches that convey stormwater to Facility ponds and outfalls, or subsurface connections between storm drain inlets (refer to Appendix B, Exhibit 1).
- b. All stormwater pollutant sources. For example, the site map does not show dredge material stockpiles outside the Facility fence line in the east area of the Facility (refer to Appendix A, Photographs 9 and 10 and Appendix B, Exhibit 1).
- c. Stormwater monitoring points (refer to Appendix B, Exhibit 1).
- d. Locations of stormwater run-on to the Facility from neighboring properties (refer to Appendix B, Exhibit 1). The Inspection Team observed one location along the Facility's northeast perimeter (Drainage Area 15) where stormwater appeared to flow onto the Facility from the neighboring undeveloped property (refer to Appendix A, Photographs 11 and 12).
- e. All stormwater inlets and discharge points, with a unique identification code for each discharge point and an approximate outline of the areas draining to each discharge point. The Inspection Team also observed that the Drainage Areas identified on the site map are not correlated with the Facility's outfalls and do not accurately portray stormwater drainage throughout the Facility. For example, Drainage Area 15 contains three outfalls, and many of the drainage areas contain zero outfalls (refer to Appendix B, Exhibit 1). Facility representatives stated that Gosney Pond, which discharges to Outfall IGP-011, receives drainage from many areas of the Facility beyond Drainage Area 13. Outfall IGP-006 is not located on the Facility's perimeter and therefore does not represent a location where stormwater discharges from the Facility (refer to Appendix B, Exhibit 1). The Inspection Team observed eight potential unidentified stormwater outfalls along the Facility's perimeter (refer to Appendix A, Photographs 12 through 25):
 - Drainage Area 15 contains three outfalls on the site map; however the Inspection Team observed an additional three potential outfalls (refer to Appendix A, Photographs 12 through 14, 17, 18 and 25).
 - Drainage Area 11 contains one outfall on the site map; however, the Inspection Team identified an additional potential outfall (refer to Appendix A, Photographs 19 and 20).
 - Drainage Area 14 contains one outfall on the site map; however, the Inspection Team identified four additional potential outfalls (refer to Appendix A, Photographs 21 through 24).

Permit requirements:

Part 6.2.2.3 of the Permit requires the Permittee's SWPPP to include a site map "showing:

- a. Boundaries of the property and the size of the property in acres;
- b. Location and extent of significant structures and impervious surfaces;
- c. Directions of stormwater flow (use arrows), including flows with a significant potential to cause soil erosion;

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- d. Locations of all stormwater control measures;
- e. Locations of all receiving waters, including wetlands, in the immediate vicinity of your facility. Indicate which waterbodies are listed as impaired and which are identified by your state, tribe, or EPA as Tier 2, Tier 2.5, or Tier 3 waters;
- f. Locations of all stormwater conveyances including ditches, pipes, and swales;
- g. Locations of potential pollutant sources identified under Part 6.2.3.2;
- h. Locations where significant spills or leaks identified under Part 6.2.3.3 have occurred;
- i. Locations of all stormwater monitoring points;
- j. Locations of stormwater inlets and discharge points, with a unique identification code for each discharge point (e.g., 001, 002), indicating if you are treating one or more discharge points as “substantially identical” under Parts 3.2.4.5, 6.2.5.3, and 4.1.1, and an approximate outline of the areas draining to each discharge point;
- k. If applicable, municipal separate storm sewer systems (MS4s) and where your stormwater discharges to them;
- l. Areas of Endangered Species Act-designated critical habitat for endangered or threatened species, if applicable.
- m. Locations of the following activities where such activities are exposed to precipitation:
 - i. fueling stations;
 - ii. vehicle and equipment maintenance and/or cleaning areas;
 - iii. loading/unloading areas;
 - iv. locations used for the treatment, storage, or disposal of wastes;
 - v. liquid storage tanks;
 - vi. processing and storage areas;
 - vii. immediate access roads and rail lines used or traveled by carriers of raw materials, manufactured products, waste material, or by-products used or created by the facility;
 - viii. transfer areas for substances in bulk;
 - ix. machinery;
 - x. locations and sources of run-on to your site from adjacent property that contains significant quantities of pollutants.”

Corrective Action:

In accordance with Part 6.2.2 of the Permit, update the site map to include the locations of all stormwater conveyances including ditches, pipes, and swales, all stormwater pollutant sources, stormwater monitoring points, and all stormwater inlets and discharge points, with a unique identification code for each discharge point and an approximate outline of the areas draining to each discharge point. Include the updated site map in the SWPPP and submit the updated SWPPP and site map to EPA.

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Finding 2:

The Facility Plant Operators who were present at the closing conference stated that they have not been trained on how to properly collect representative stormwater samples. Additionally, the Inspection Team observed that the Permittee's stormwater training slides did not include content on stormwater sampling.

The Facility Plant Operators are responsible for collecting stormwater samples in accordance with the monitoring requirements in Part 4 of the Permit. Based on conversations with Facility representatives, they collect samples from the downstream end of the North Stormwater Holding Pond when they open the valve to discharge flow to Outfall IGP-011 following significant storm events. The Permittee reported two discharge events in 2024 (on 6/22/24 and 9/17/24) where samples were taken from sample point 5 at Outfall IGP-011. Facility representatives explained that the remaining outfalls had insufficient flow to capture a sample during both discharge events. After collecting the samples, the Plant Operators send the samples to Eurofins (formerly Hall Environmental) in Albuquerque, New Mexico for analysis.

Permit requirements:

Part 2.1.2.8a of the Permit (Type of Personnel Who Require Training) states "You must train all employees who work in areas where industrial materials or activities are exposed to stormwater, or who are responsible for implementing activities necessary to comply with this permit (e.g., inspectors, maintenance personnel), including all members of your stormwater pollution prevention team. You must ensure the following personnel understand the requirements of this permit and their specific responsibilities with respect to those requirements:

- i. Personnel who are responsible for the design, installation, maintenance, and/or repair of controls (including pollution prevention measures);
- ii. Personnel responsible for the storage and handling of chemicals and materials that could become pollutants discharged via stormwater;
- iii. Personnel who are responsible for conducting and documenting inspections and monitoring as required in Parts 3 and 4; and
- iv. Personnel who are responsible for taking and documenting corrective actions as required in Part 5.

Section B.10 of Appendix B of the Permit (Monitoring and Records) specifies additional monitoring requirements.

Corrective Action:

In accordance with Part 2.1.2.8 of the Permit, ensure that all personnel responsible for conducting stormwater monitoring (Permit Section 4) understand the requirements of the Permit and their specific responsibilities with respect to those requirements. Provide the EPA with a written narrative description of the corrective action to address this finding.

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Finding 3:

The Inspection Team observed stormwater pollutant sources without overhead cover or other control measures implemented to minimize pollutant discharges in stormwater runoff. Specifically, the Inspection Team observed:

- a. Uncovered and uncontained piles of dredged sediment located outside of the fence line in the north area of the Facility (refer to Appendix A, Photographs 9 and 10).
- b. Uncovered and uncontained piles of dredged sediment located outside the Soil Drying Containment area in Drainage Area 15 (refer to Appendix A, Photographs 26 and 27).
- c. Scrap and reclaimed metal parts stored directly on the ground and without containment or overhead cover in the boneyard in the east area of the Facility, as well as upgradient from Gosney Pond in the northwest area of the Facility (refer to Appendix A, Photographs 28 through 34). Some of the metal materials in the boneyard were stored on pallets or racks to prevent direct contact with stormwater flow, but many of the materials were sitting directly on the ground.
- d. An uncovered scrap metal dumpster in the boneyard (refer to Appendix A, Photographs 35 and 36). The Inspection Team observed liquid leaking from the dumpster (refer to Appendix A, Photograph 37).

Permit requirements:

Part 2.1 (Stormwater Control Measures) of the Permit states, “You must select, design, install, and implement stormwater control measures (including best management practices) to minimize pollutant discharges that address the selection and design considerations in Part 2.1.1, meet the non-numeric effluent limits in Part 2.1.2, meet limits contained in applicable effluent limitations guidelines in Part 2.1.3, and meet the water quality-based effluent limitations in Part 2.2.

The selection, design, installation, and implementation of control measures to comply with Part 2 must be in accordance with good engineering practices and manufacturer’s specifications. Note that you may deviate from such manufacturer’s specifications where you provide justification for such deviation and include documentation of your rationale in the part of your SWPPP that describes your control measures, consistent with Part 6.2.4. You must modify your stormwater control measures per Part 5.1 if you find that your control measures are not achieving their intended effect of minimizing pollutant discharges (i.e., your discharges will be controlled as necessary such that the receiving water of the United States will meet applicable water quality standards or meet any of the other non-numeric effluent limits in this permit). Regulated stormwater discharges from your facility include stormwater run-on that commingles with stormwater discharges associated with industrial activity at your facility.

2.1.1 Stormwater Control Measure Selection and Design Considerations. You must consider the following when selecting and designing control measures:

2.1.1.1 Preventing stormwater from coming into contact with polluting materials is generally more effective, and less costly, than trying to remove pollutants from stormwater;

2.1.1.2 Using stormwater control measures in combination may be more effective than using control measures in isolation for minimizing pollutants in your stormwater discharge;

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2.1.1.3 Assessing the type and quantity of pollutants, including their potential to impact receiving water quality, is critical to designing effective stormwater control measures that will achieve the limits in this permit;

2.1.1.4 Minimizing impervious areas at your facility and infiltrating stormwater onsite (including bioretention cells, green roofs, and pervious pavement, among other approaches) can reduce the frequency and volume of discharges and improve ground water recharge and stream base flows in local streams, although care must be taken to avoid ground water contamination;

2.1.1.5 Attenuating flow using open vegetated swales and natural depressions can reduce in-stream impacts of erosive flows;

2.1.1.6 Conserving and/or restoring riparian buffers will help protect streams from stormwater discharges and improve water quality;

2.1.1.7 Using treatment interceptors (e.g., swirl separators and sand filters) may be appropriate in some instances to minimize the discharge of pollutants...”

Corrective Action:

In accordance with Part 2.1 of the Permit, select, design, install, and implement stormwater control measures to minimize pollutant discharges in stormwater runoff from dredged sediment and scrap and reclaimed metal materials. Provide the EPA with a written narrative description and photographs of the corrective actions to address this finding.

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Findings, Corrective Actions and Recommendations

Finding 4:

The Inspection Team observed unstabilized slopes throughout the Facility with evidence of erosion (e.g., rills). Specifically, the Inspection Team observed evidence of erosion at the following locations:

- a. The bank of the ditch that drains into Gosney Pond (refer to Appendix A, Photograph 38).
- b. The stormwater drainage pathway along the fence line in northeastern corner of Drainage Area 5 (refer to Appendix A, Photograph 39).
- c. The western bank of the decommissioned West Excess Pond (refer to Appendix A, Photographs 40, 41, and 42).
- d. The western bank of the ditch leading to Outfall IGP-011 from the culvert at the western end of the North Evaporation Stormwater Holding Pond (refer to Appendix A, Photograph 43).
- e. Along the fence line in Drainage Area 15, south of the Soil Drying Containment area (refer to Appendix A, Photograph 44).
- f. The stormwater drainage pathway leading to West Excess Pond (refer to Appendix A, Photograph 45).
- g. A slope upgradient from a stormwater drainage path in Drainage Area 15 which leads to Outfall IGP-006 (refer to Appendix A, Photograph 46).
- h. The bank of the ditch near the parking lot in the west area of the Facility, which drains to North Evaporation Stormwater Holding Pond (refer to Appendix A, Photograph 47).

The Inspection Team observed accumulated sediment and gravel in stormwater conveyances and drainage pathways, as well as at Facility outfalls. Specifically, the Inspection Team observed accumulated sediment and/or gravel at the following locations:

- i. In the North Evaporation Stormwater Holding Pond, as well as in the inlets, ditches, culverts and drainage channel that drain to and from of the pond (refer to Appendix A, Photographs 48 through 57).
- j. In a stormwater holding pond that receives drainage from Drainage Area 7 and drains to North Evaporation Holding Pond (refer to Appendix A, Photographs 58 and 59).
- k. In Gosney Pond, as well as in the culverts and ditches that convey stormwater both into and from Gosney Pond (refer to Appendix A, Photographs 60 through 69).
- l. The ditch upgradient from Outfall IGP-001 (refer to Appendix A, Photographs 70, 71, and 72).
- m. A drainage ditch in the northwestern corner of Drainage Area 15, which drains to Outfall IGP-003 (refer to Appendix A, Photographs 73 and 74).
- n. Inside the catch basin of an unprotected storm drain inlet just west of the Make-Up Water Tank area, in Drainage Area 1 (refer to Appendix A, Photographs 75 and 76).
- o. Inside the catch basins of a series of connected storm drain inlets along the Facility's north perimeter (refer to Appendix A, Photographs 77 through 82). No inlet protection control measures were implemented to prevent material from entering the catch basins.
- p. In two culverts in Drainage Area 15 that ultimately drain to Outfall IGP-003 (refer to Appendix A, Photographs 83 through 87).
- q. Immediately upgradient from Outfall IGP-004 (refer to Appendix A, Photographs 88, 89, and 90).

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- r. A drainage ditch conveying stormwater from the northern corner of Drainage Area 6 to Outfall IGP-006 (refer to Appendix A, Photographs 91 through 94).
- s. A culvert and stormwater drainage pathways upgradient from Outfall IGP-009, south of the East and West Excess Ponds (refer to Appendix A, Photographs 95 through 99).
- t. In a ditch along the west berm of Clearwater Pond in the south-central area of the Facility (refer to Appendix A, Photograph 100).
- u. Upgradient from a culvert that drains into the boneyard in Drainage Area 6 (refer to Appendix A, Photograph 101).
- v. Inside the Outfall IGP-011 discharge pipe and in the stormwater drainage pathway upgradient from Outfall IGP-011 (refer to Appendix A, Photographs 102, 103, and 104).

Permit requirements:

Part 2.1.2.5 (Erosion and Sediment Control) of the Permit states: “To minimize pollutant discharges in stormwater, you must minimize erosion by stabilizing exposed soils at your facility and placing flow velocity dissipation devices at discharge locations to minimize channel and streambank erosion and scour in the immediate vicinity of discharge points. You must also use structural and non-structural control measures to minimize the discharge of sediment. If you use polymers and/or other chemical treatments as part of your controls, you must identify the polymers and/or chemicals used and the purpose in your SWPPP. There are many resources available to help you select appropriate SCMs for erosion and sediment control, including EPA’s Stormwater Discharges from Construction Activities website at: <https://www.epa.gov/npdes/stormwater-discharges-construction-activities>.”

Corrective Action:

In accordance with Part 2.1.2.5 of the Permit, stabilize exposed soils and use flow velocity dissipation devices at discharge locations to minimize channel and streambank erosion and scour in the immediate vicinity of discharge points. Use structural and non-structural control measures to control the discharge of sediment. Provide the EPA with a written narrative description and photographs of the corrective actions to address this finding.

Finding 5:

The Inspection Team observed stormwater control measures in need of maintenance throughout the Facility. Specifically, the Inspection Team observed:

- a. Catch basins containing sediment and rocks above outlet pipes (refer to Appendix A, Photographs 75 through 82). No control measures were implemented to minimize material entering the catch basin inlets.
- b. Straw wattles that were deteriorated and/or had sediment accumulated against them (refer to Appendix A, Photographs 105 and 106). Additionally, wattles installed around the Soil Drying Containment area in the northwest area of the Facility appeared to have been recently installed, but there were gaps between some consecutive segments creating potential for sediment to leave the site (refer to Appendix A, Photographs 107, 108, and 109).
- c. Sediment accumulated against a straw wattle that had been installed along the southeastern fence line of Drainage Area 14, next to the South Evaporation Pond (refer to Appendix A, Photographs 110 and 111).

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Findings, Corrective Actions and Recommendations

- A concrete washout area in the northeast area of the Facility (Drainage Area 15) that was more than half full (refer to Appendix A, Photograph 112).

Additionally, the Inspection Team observed that Facility's routine self-inspection reports from 8/15/2024, 8/21/2024 and 2/28/2025 identified straw wattles in need of replacement around the dredged sediment piles in the northeast area of the Facility. However, the other maintenance issues listed above were not identified in the Facility's self-inspection records.

Permit requirements:

Part 2.1.2.3.a (Maintenance Activities) of the Permit states, "You must maintain all control measures that are used to achieve the effluent limits in this permit in effective operating condition, as well as all industrial equipment and systems, in order to minimize pollutant discharges. This includes:

- ii. Performing inspections and preventive maintenance of stormwater drainage, source controls, treatment systems, and plant equipment and systems that could fail and result in discharges of pollutants via stormwater.
- iii. Maintaining non-structural control measures (e.g., keep spill response supplies available, personnel appropriately trained).
- iv. Inspecting and maintaining baghouses at least quarterly to prevent the escape of dust from the system and immediately removing any accumulated dust at the base of the exterior baghouse.*
- v. Cleaning catch basins when the depth of debris reaches two-thirds (2/3) of the sump depth, or in line with manufacturer specifications, whichever is lower, and keeping the debris surface at least six inches below the lowest outlet pipe."

Corrective Action:

In accordance with Part 2.1.2.3.a of the permit, ensure that all stormwater control measure maintenance needs are identified through inspections and maintenance is conducted as needed to keep control measures in effective operating condition. Provide the EPA with a written narrative description and photographs of the corrective actions to address this finding.

NPDES Stormwater Industrial and Construction Inspection Report: Appendix A, Photograph Log



Photograph 1. View, facing Southeast, of a lined basin in the Soil Drying Containment Area in the Northeast area of the Facility.



Photograph 2. View, facing Northeast, of an unlined basin in the Soil Drying Containment Area in the Northeast area of the Facility.

NPDES Stormwater Industrial and Construction Inspection Report: Appendix A, Photograph Log



Photograph 3. Additional view, facing East, of the unlined basin in the Soil Drying Containment Area, as referenced in Photograph 2.



Photograph 4. View, facing West, of East Excess Pond.

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Photograph 5. View, facing Southwest, of above ground storage tanks containing industrial wastewater.



Photograph 6. View, facing South, of the secondary containment area for the above ground storage tanks, as referenced in Photograph 5.

NPDES Stormwater Industrial and Construction Inspection Report: Appendix A, Photograph Log



Photograph 7. View, facing North, of Outfall IGP-012.



Photograph 8. Close-up view of Outfall IGP-012, as shown in Photograph 7.

NPDES Stormwater Industrial and Construction Inspection Report: Appendix A, Photograph Log

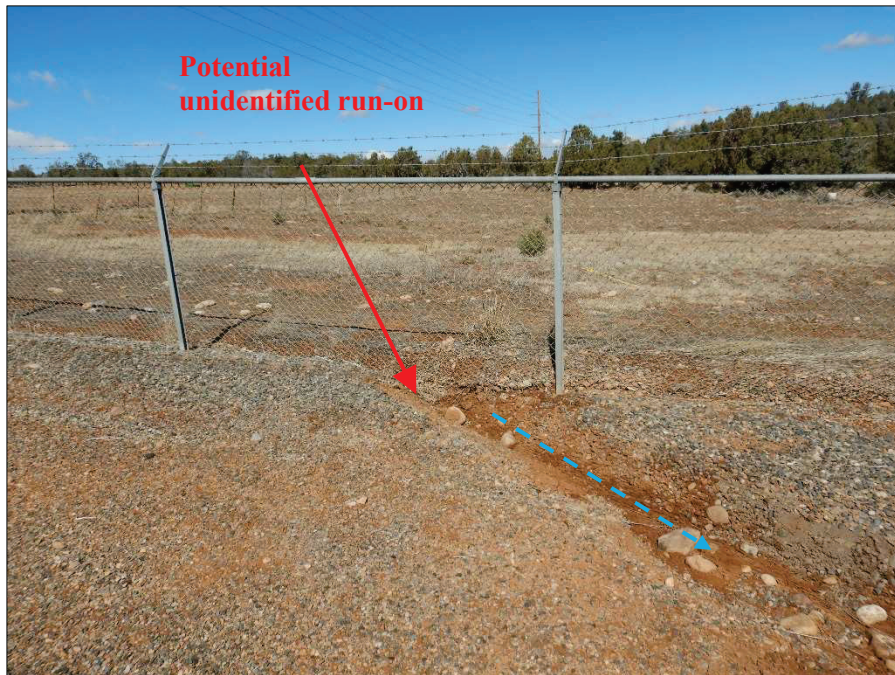


Photograph 9. View, facing Southeast, of fence line in Drainage Area 15. Note uncovered and uncontained dredged material outside of the fence line.

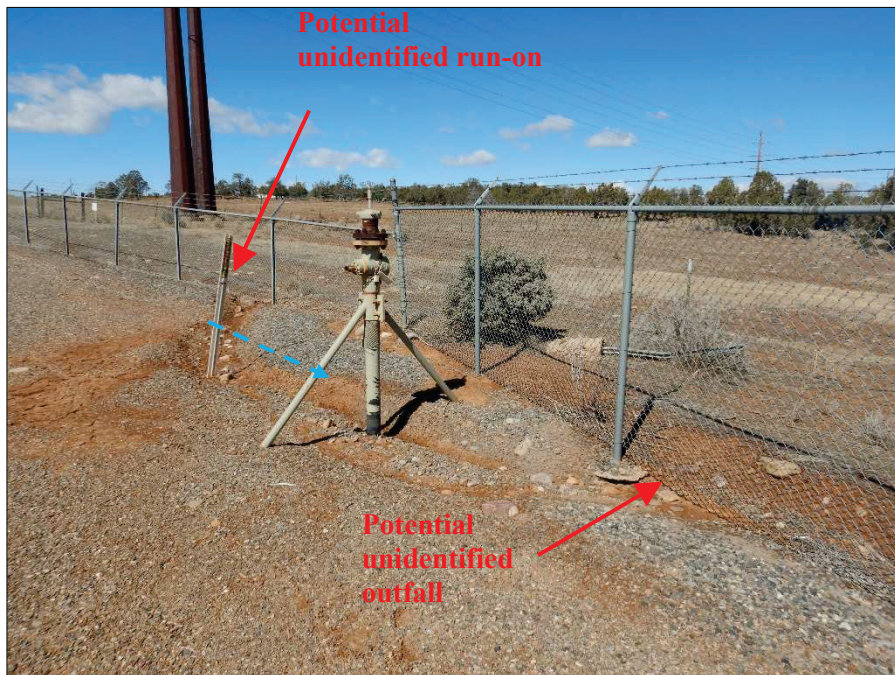


Photograph 10. Additional view, facing West, of dredged material outside of the fence line Drainage Area 15, as referenced in Photograph 9. Note piles are uncovered and uncontained.

NPDES Stormwater Industrial and Construction Inspection Report: Appendix A, Photograph Log

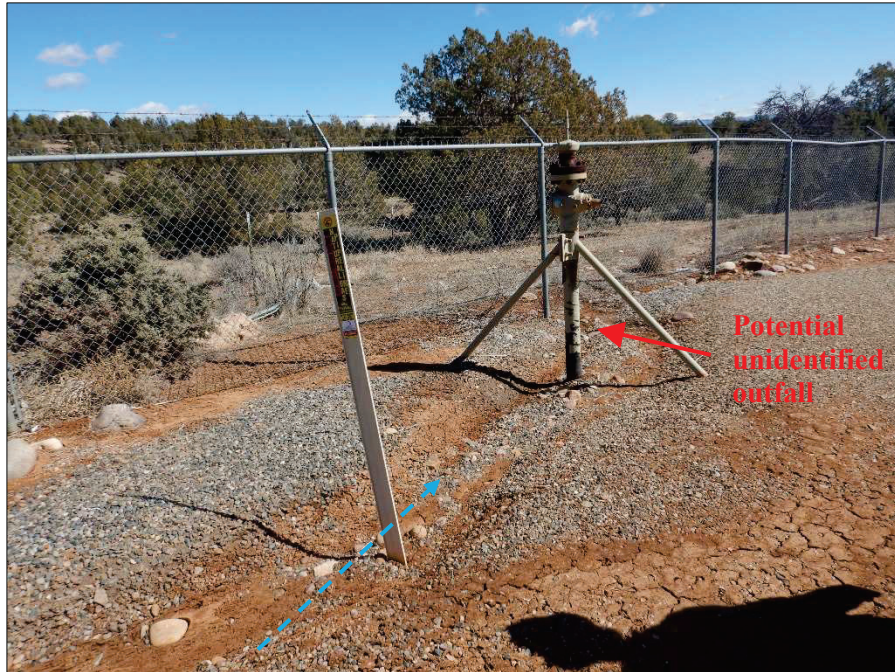


Photograph 11. View, facing North, of potential unidentified run-on in Drainage Area 15.



Photograph 12. View, facing Northwest, of potential unidentified run-on and outfall in Drainage Area 15, as referenced in Photograph 11.

NPDES Stormwater Industrial and Construction Inspection Report: Appendix A, Photograph Log



Photograph 13. Additional view, facing Southeast, of potential unidentified outfall in Drainage Area 15, as referenced in Photograph 12.



Photograph 14. Additional view, facing Northwest, of potential unidentified outfall in Drainage Area 15, as referenced in Photographs 12 and 13.

NPDES Stormwater Industrial and Construction Inspection Report: Appendix A, Photograph Log

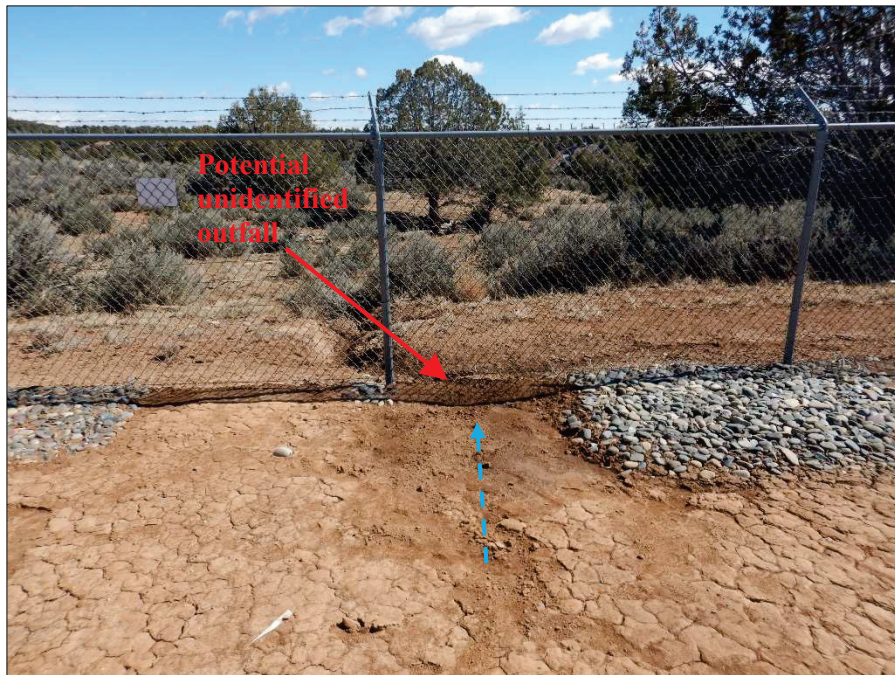


Photograph 15. View, facing East, of a stormwater drainage pathway leading from the Facility's boneyard toward the potential unidentified outfall shown in Photograph 25.

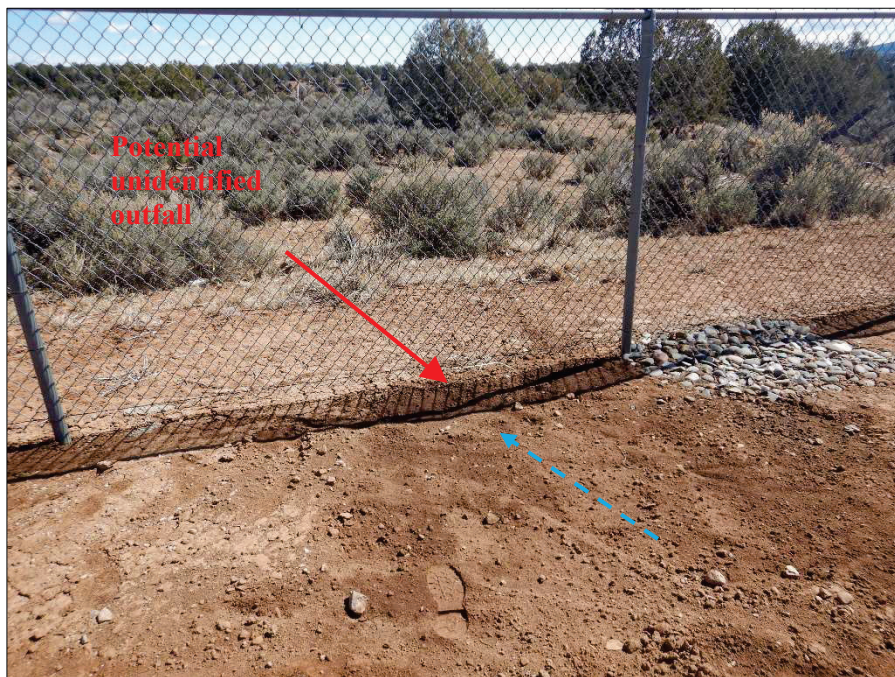


Photograph 16. Additional view, facing East, of the stormwater drainage pathway leading from the Facility's boneyard toward the potential unidentified outfall shown in Photograph 25, as referenced in Photograph 15.

NPDES Stormwater Industrial and Construction Inspection Report: Appendix A, Photograph Log

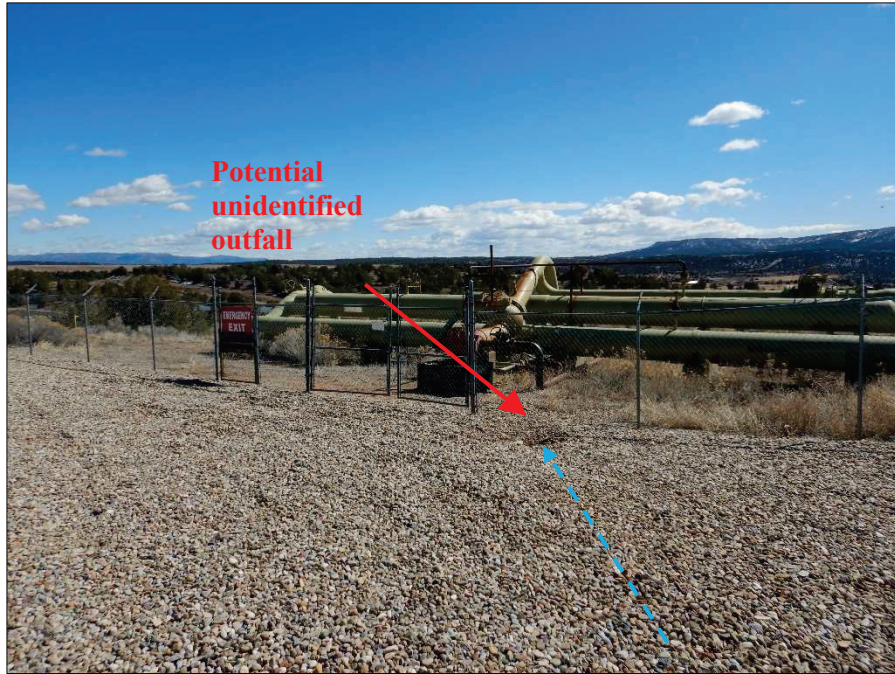


Photograph 17. View, facing East, of a potential unidentified outfall point in Drainage Area 15, near the Soil Drying Containment Area.

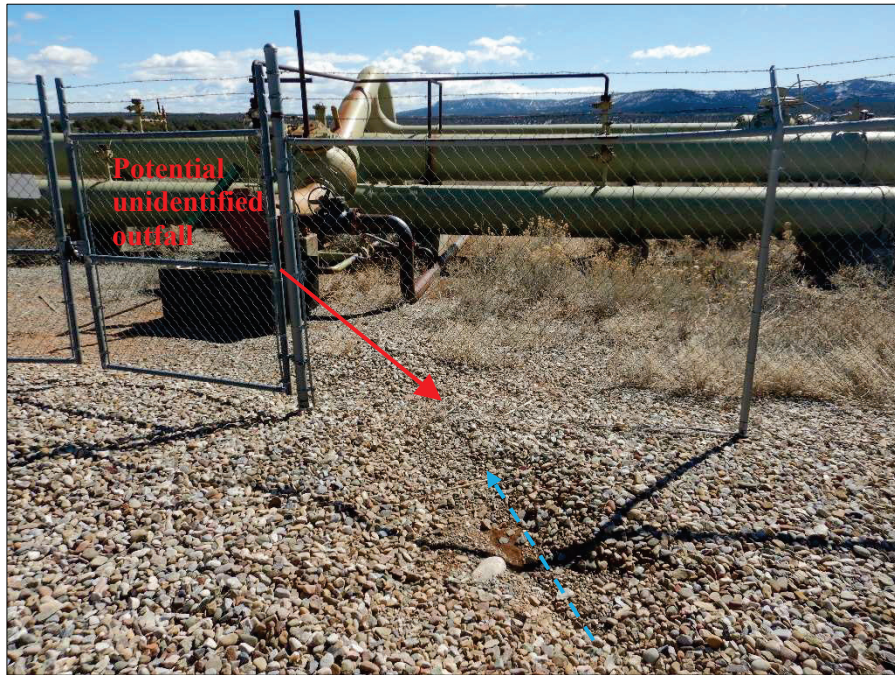


Photograph 18. Close-up view, facing East, of a potential unidentified outfall point in Drainage Area 15, near the Soil Drying Containment Area, as referenced in Photograph 17.

NPDES Stormwater Industrial and Construction Inspection Report: Appendix A, Photograph Log



Photograph 19. View, facing South, of a potential unidentified outfall point in Drainage Area 11.



Photograph 20. Close-up view, facing South, of a potential unidentified outfall point in Drainage Area 11, as referenced in Photograph 19.

NPDES Stormwater Industrial and Construction Inspection Report: Appendix A, Photograph Log

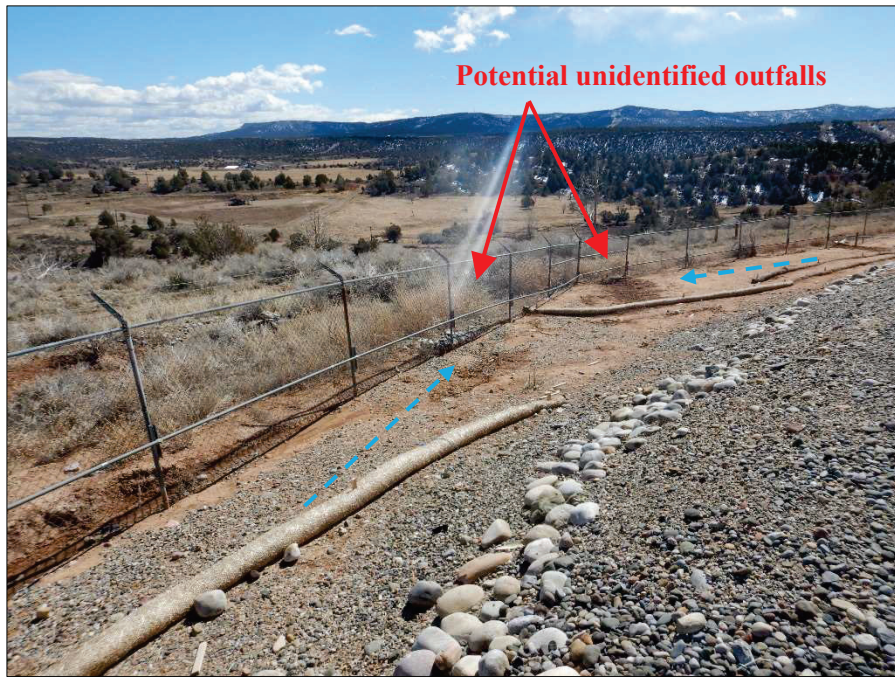


Photograph 21. View, facing South, of a potential unidentified outfall in Drainage Area 14.

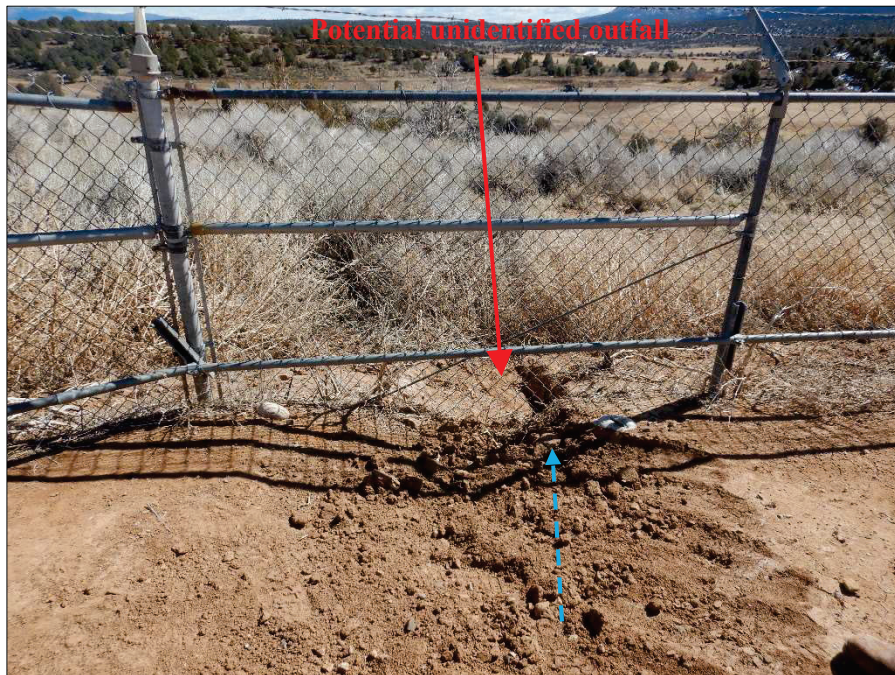


Photograph 22. View, facing South, of another potential unidentified outfall point in Drainage Area 14.

NPDES Stormwater Industrial and Construction Inspection Report: Appendix A, Photograph Log



Photograph 23. View, facing South, of potential unidentified outfall points in Drainage Area 14.



Photograph 24. Close-up view, facing Southeast, of one of the potential unidentified outfall points in Drainage Area 14, as referenced in Photograph 23.

NPDES Stormwater Industrial and Construction Inspection Report: Appendix A, Photograph Log



Photograph 25. View, facing Southeast, of potential unidentified outfall point near dredged sediment piles outside of fence line in Drainage Area 15.



Photograph 26. View, facing Southwest, of dredged material stored in Drainage Area 15, upgradient from Outfall IGP-004. Note piles are uncovered and uncontained.

NPDES Stormwater Industrial and Construction Inspection Report: Appendix A, Photograph Log



Photograph 27. Additional view, facing Northeast, of dredged material stored in Drainage Area 15, as referenced in Photograph 26. Note piles are uncovered and uncontained.



Photograph 28. View, facing Southeast, of boneyard. Note materials are uncovered and sitting on ground.

NPDES Stormwater Industrial and Construction Inspection Report: Appendix A, Photograph Log

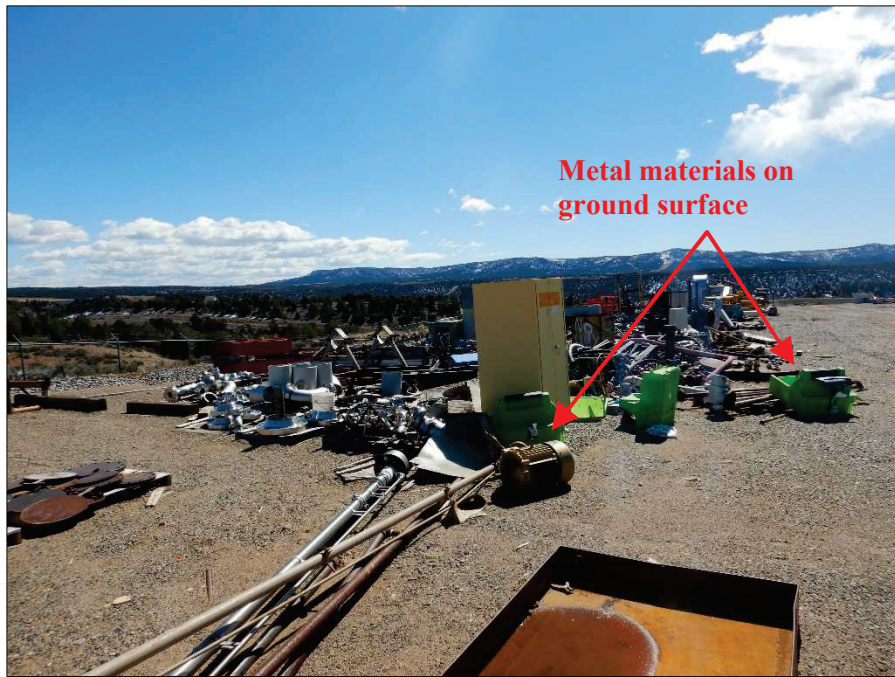


Photograph 29. Additional view, facing Northeast, of boneyard, as referenced in Photograph 28. Note materials are uncovered and sitting on the ground.



Photograph 30. Additional view, facing Southwest, of boneyard, as referenced in Photographs 28 and 29. Note materials are uncovered and sitting on the ground.

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Photograph 31. Additional view, facing South, of boneyard, as referenced in Photographs 28 through 30. Note materials are uncovered and sitting on the ground.



Photograph 32. Additional view, facing Southwest, of the Facility boneyard, as referenced in Photographs 28 through 31. Note materials are uncovered and sitting on the ground. The 55-gallon drum on the left side of the photo was empty at the time of the inspection.

NPDES Stormwater Industrial and Construction Inspection Report: Appendix A, Photograph Log



Photograph 33. View, facing West, of metal parts stored directly on the ground and without containment or overhead cover in Drainage Area 1.



Photograph 34. Additional view, facing West, of metal parts stored directly on the ground and without containment or overhead cover, as referenced in Photograph 33.

NPDES Stormwater Industrial and Construction Inspection Report: Appendix A, Photograph Log



Photograph 35. View, facing South, of an uncovered scrap metal dumpster in the Facility boneyard.



Photograph 36. View inside the uncovered scrap metal dumpster, as referenced in Photograph 35. Note dumpster is uncovered.

NPDES Stormwater Industrial and Construction Inspection Report: Appendix A, Photograph Log

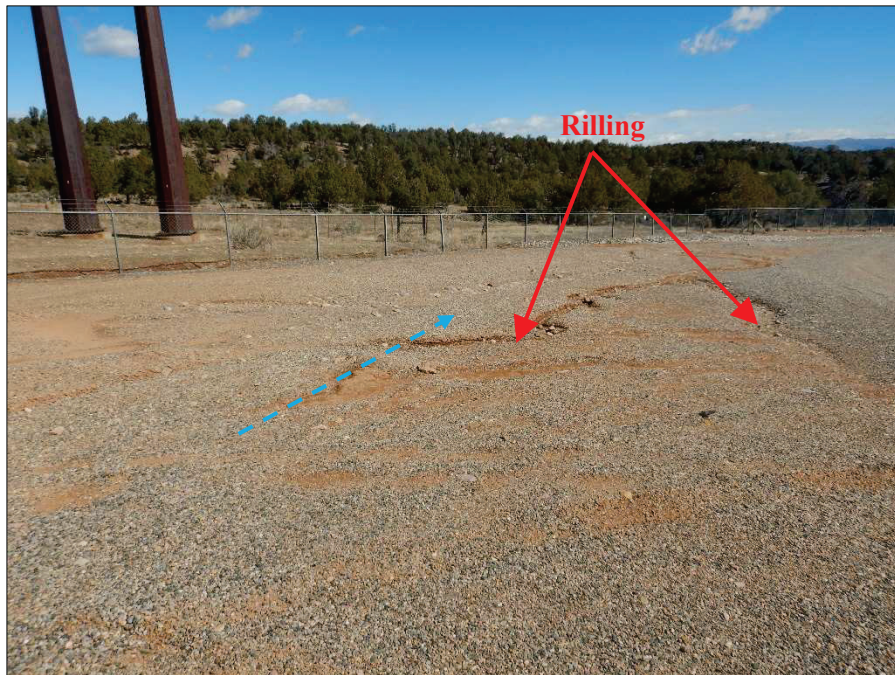


Photograph 37. Additional view of dumpster in boneyard, as referenced in Photographs 35 and 36. Note leakage from dumpster.



Photograph 38. View, facing West, of the bank of the ditch that drains into Gosney Pond. Note the rilling on the bank.

NPDES Stormwater Industrial and Construction Inspection Report: Appendix A, Photograph Log



Photograph 39. View, facing East, of rilling in a stormwater drainage pathway along the fence line in the Northeastern corner of Drainage Area 5.



Photograph 40. View, facing North, of West Excess Pond. Note rilling on the pond bank.

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Photograph 41. Additional view, facing Southeast, of West Excess Pond, as referenced in Photograph 40. Note rilling on the pond bank.

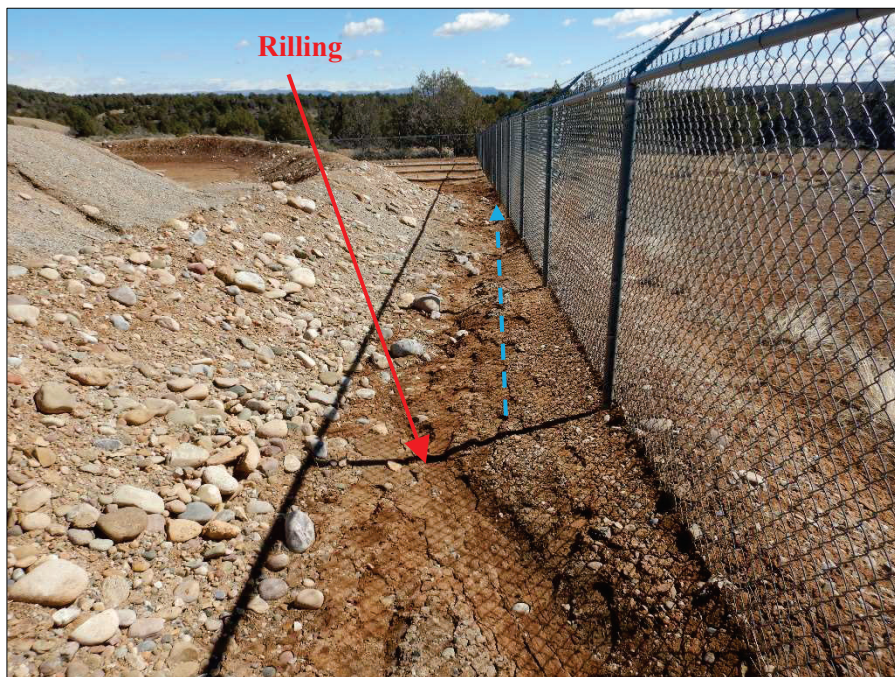


Photograph 42. Additional view, facing Southeast, of West Excess Pond, as referenced in Photographs 40 and 41. Note rilling on the pond bank.

NPDES Stormwater Industrial and Construction Inspection Report: Appendix A, Photograph Log



Photograph 43. View, facing North, of bank of the ditch leading to Outfall IGP-011. Note rilling on the unstabilized bank.

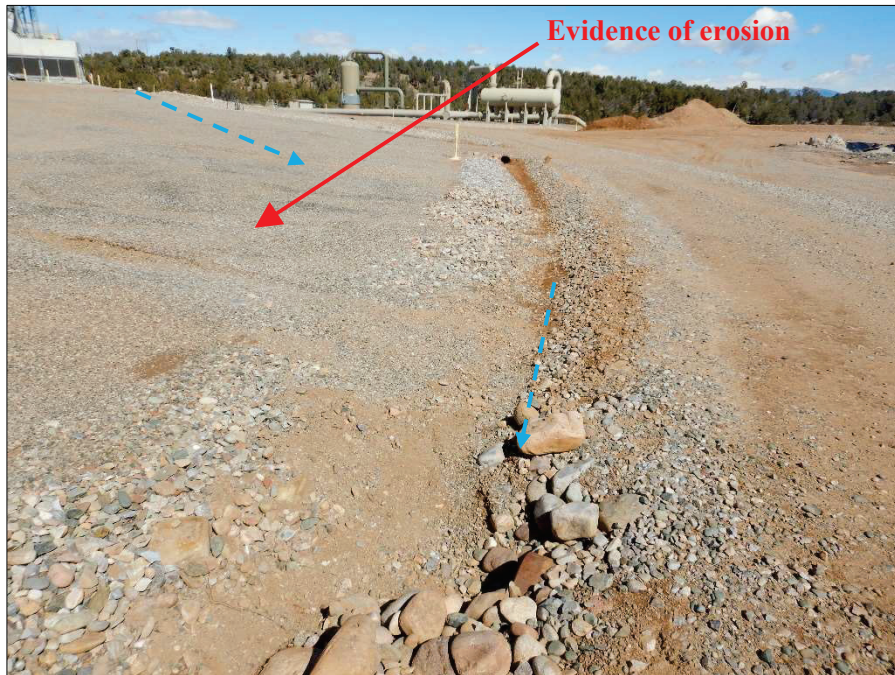


Photograph 44. View, facing East, of rilling along the fence line in Drainage Area 15, South of the Soil Drying Containment Area. Note erosion and sediment accumulation.

NPDES Stormwater Industrial and Construction Inspection Report: Appendix A, Photograph Log

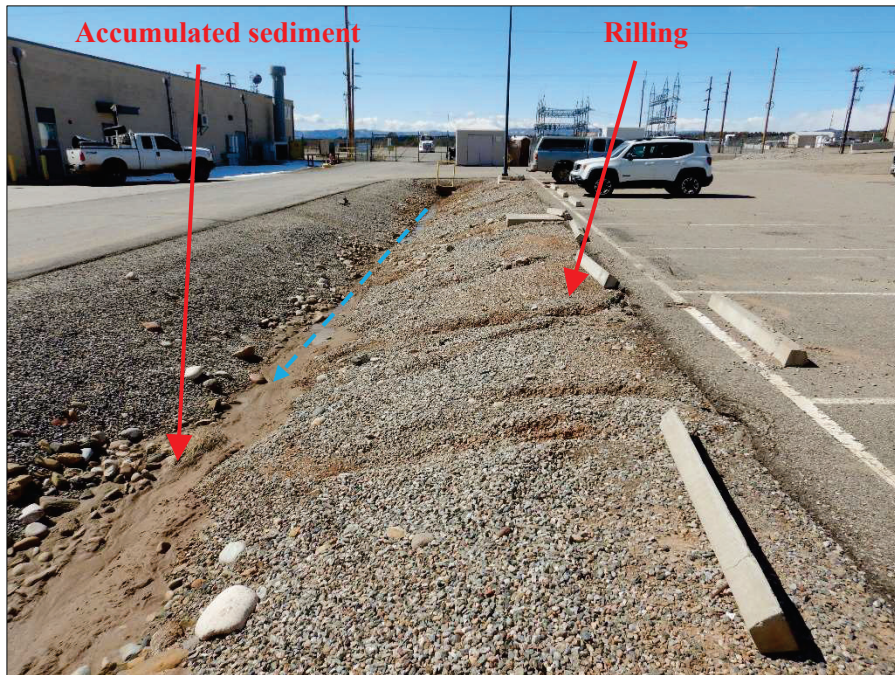


Photograph 45. View, facing South, of outlet of culvert leading to West Excess Pond. Note evidence of erosion.



Photograph 46. View, facing Northeast, of a stormwater drainage path in Drainage Area 15 which leads to Outfall IGP-006. Note the evidence of erosion on the upgradient slope.

NPDES Stormwater Industrial and Construction Inspection Report: Appendix A, Photograph Log



Photograph 47. View, facing West, of a ditch adjacent to parking lot that drains to North Evaporation Stormwater Holding Pond. Note rilling on the bank and accumulated sediment in the ditch.



Photograph 48. View, facing North, of a drainage inlet flowing from Drainage Area 3 to the North Evaporation Stormwater Holding Pond. Note sediment accumulation.

NPDES Stormwater Industrial and Construction Inspection Report: Appendix A, Photograph Log



Photograph 49. View, facing Northeast, of the outlet pipe from the inlet shown in Photograph 48. From here, flow continues across the facility parking lot toward the North Evaporation Stormwater Holding Pond. Note sediment and gravel accumulation.



Photograph 50. View, facing Northeast, of ditch and inlet of culvert near parking lot connecting to the ditch leading to North Evaporation Stormwater Holding Pond.

NPDES Stormwater Industrial and Construction Inspection Report: Appendix A, Photograph Log



Photograph 51. Additional view, facing South, inlet of culvert and ditch near parking lot connecting to the ditch leading to North Evaporation Stormwater Holding Pond, as referenced in Photograph 50.



Photograph 52. Additional view, facing South, of a stormwater drainage channel connecting the locations shown in Photographs 48 through 51 to North Evaporation Stormwater Holding Pond.

NPDES Stormwater Industrial and Construction Inspection Report: Appendix A, Photograph Log



Photograph 53. View, facing East, of North Evaporation Stormwater Holding Pond. Note sediment accumulation in the pond.



Photograph 54. Additional view, facing Northwest, of North Evaporation Stormwater Holding Pond, as referenced in Photograph 54. Note sediment accumulation in the pond.

NPDES Stormwater Industrial and Construction Inspection Report: Appendix A, Photograph Log



Photograph 55. Additional view, facing West, of North Evaporation Stormwater Holding Pond, as referenced in Photographs 53 and 54. Note sediment accumulation in the pond.



Photograph 56. Additional view, facing Southwest, of North Evaporation Stormwater Holding Pond, as referenced in Photographs 53 through 55. Note sediment accumulation in the pond.

NPDES Stormwater Industrial and Construction Inspection Report: Appendix A, Photograph Log



Photograph 57. View, facing Northeast, of the North Evaporation Stormwater Holding Pond discharge pipe. Note sediment and gravel accumulation in the pipe.

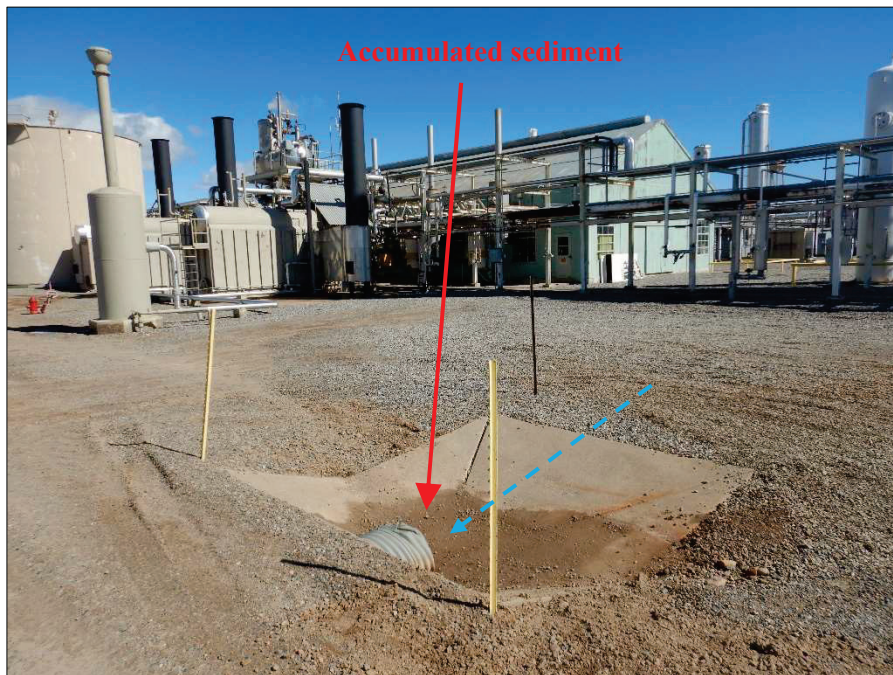


Photograph 58. View, facing West, of a stormwater holding pond that receives drainage from Drainage Area 7 and drains to North Evaporation Holding Pond. Note sediment accumulation in the pond.

NPDES Stormwater Industrial and Construction Inspection Report: Appendix A, Photograph Log



Photograph 59. View, facing South, of culvert and ditch leading from the stormwater holding pond shown in Photograph 58 towards North Evaporation Stormwater Holding Pond.



Photograph 60. View, facing Northeast, of inlet of a culvert connecting Drainage Area 1 to Gosney Pond. Note sediment accumulation.

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Photograph 61. Close-up view, facing West, of inlet of culvert connecting Drainage Area 1 to Gosney Pond, as referenced in Photograph 60. Note sediment accumulation.



Photograph 62. View, facing Southwest, of the outlet of the culvert connecting Drainage Area 1 to Gosney Pond, as referenced in Photographs 60 and 61.

NPDES Stormwater Industrial and Construction Inspection Report: Appendix A, Photograph Log



Photograph 63. View, facing North, of the outlet of a culvert connecting to Gosney Pond.



Photograph 64. View, facing Northwest, of Gosney Pond. Note accumulated sediment in the pond.

NPDES Stormwater Industrial and Construction Inspection Report: Appendix A, Photograph Log

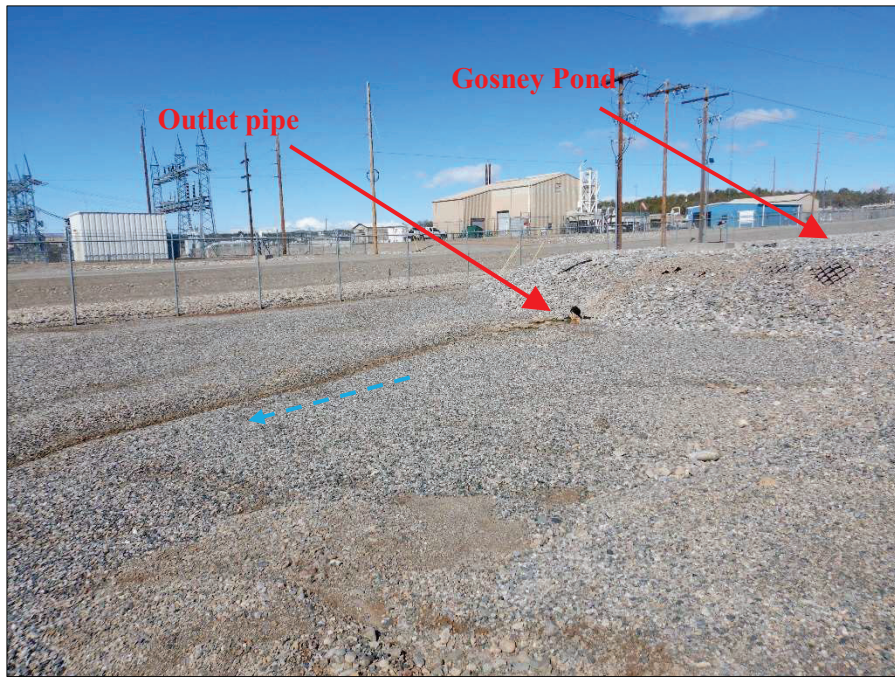


Photograph 65. Close-up view, facing Southeast, of Gosney Pond including outlet structure, as referenced in Photograph 64.

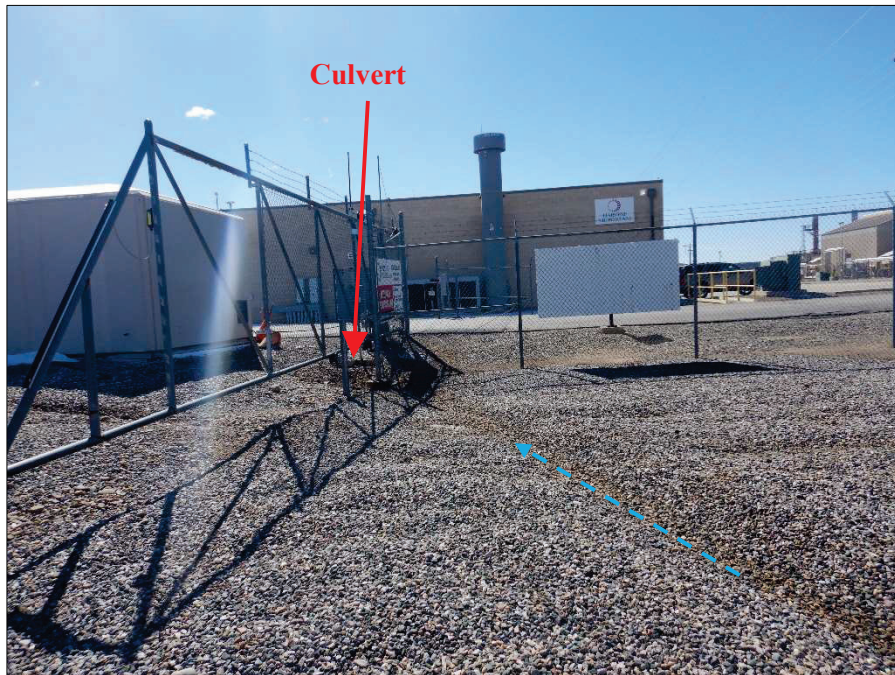


Photograph 66. Additional view, facing North, of inlet to Gosney Pond, as referenced in Photographs 64 and 65. Note accumulated sediment in the pond.

NPDES Stormwater Industrial and Construction Inspection Report: Appendix A, Photograph Log



Photograph 67. View, facing Northwest, of the outlet pipe and ditch that flow away from Gosney Pond.



Photograph 68. View, facing South, of ditch and culvert beneath main entrance road, connecting Gosney Pond to Drainage Area 8.

NPDES Stormwater Industrial and Construction Inspection Report: Appendix A, Photograph Log



Photograph 69. Close-up view, facing Southeast, of culvert beneath main entrance road, connecting Gosney Pond to Drainage Area 8, as referenced in Photograph 68. Note sediment accumulation at the mouth of the pipe.

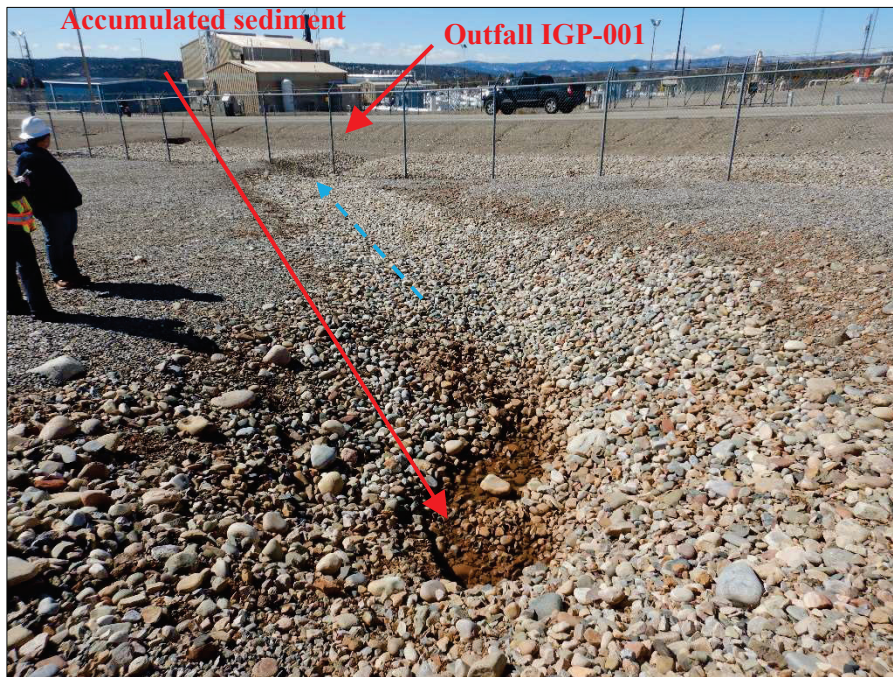


Photograph 70. View, facing East, of ditch along northern fence line of Facility that drains to Outfall IGP-001.

NPDES Stormwater Industrial and Construction Inspection Report: Appendix A, Photograph Log

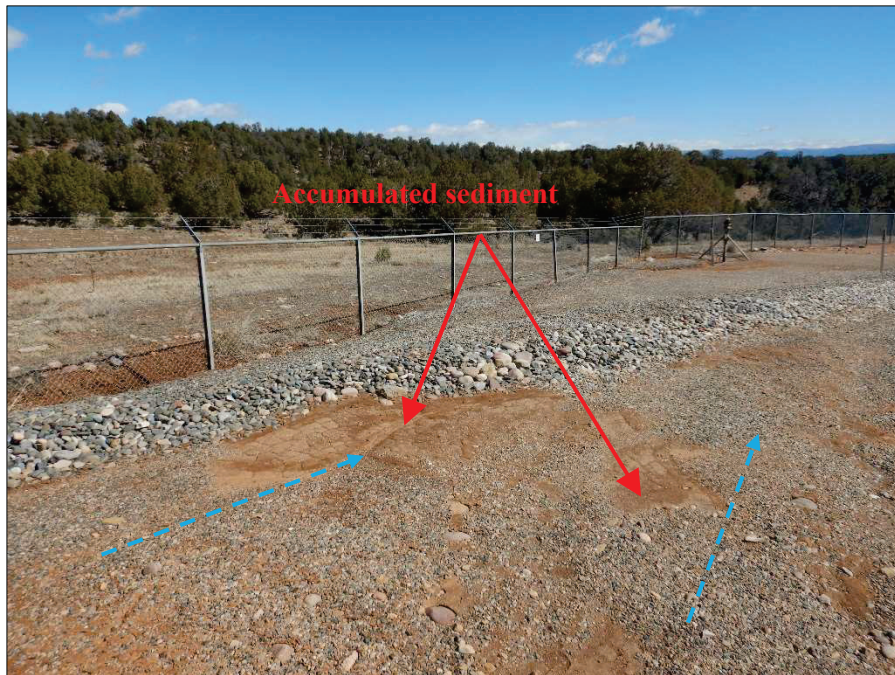


Photograph 71. View, facing West, of inlet of culvert in Drainage Area 1 leading to Outfall IGP-001.



Photograph 72. View, facing Southwest, of Outfall IGP-001. Note accumulated sediment upgradient from the outfall.

NPDES Stormwater Industrial and Construction Inspection Report: Appendix A, Photograph Log



Photograph 73. View, facing East, of accumulated sediment in a drainage ditch in the Northwestern corner of Drainage Area 15.



Photograph 74. Additional view, facing Northwest, of the ditch along Northeastern fence line in Drainage Area 15, as referenced in Photograph 73. Note accumulated sediment in the ditch.

NPDES Stormwater Industrial and Construction Inspection Report: Appendix A, Photograph Log



Photograph 75. View, facing Southwest, of an unprotected catch basin in Drainage Area 1. Note loose gravel and sediment near catch basin grate.



Photograph 76. Close-up view inside of catch basin in Drainage Area 1, as referenced in Photograph 75. Note accumulation of gravel and sediment.

NPDES Stormwater Industrial and Construction Inspection Report: Appendix A, Photograph Log



Photograph 77. View, facing West, of an unprotected catch basin in Drainage Area 2. Note loose gravel and sediment near entrance of catch basin.



Photograph 78. Close-up view into catch basin in Drainage Area 2, as shown in Photograph 77. Note accumulated sediment and gravel.

NPDES Stormwater Industrial and Construction Inspection Report: Appendix A, Photograph Log



Photograph 79. View, facing Northeast, of an unprotected catch basin in Drainage Area 1. Note loose gravel and sediment near entrance of catch basin.



Photograph 80. Close-up view into catch basin in Drainage Area 1, as shown in Photograph 79. Note accumulated sediment and gravel.

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Photograph 81. View, facing East, of catch basin in Drainage Area 1. Note loose gravel and sediment near entrance of catch basin.



Photograph 82. View, facing West, of catch basin in Drainage Area 1. Note structure is not seated in ground and loose gravel and sediment near entrance of catch basin.

NPDES Stormwater Industrial and Construction Inspection Report: Appendix A, Photograph Log

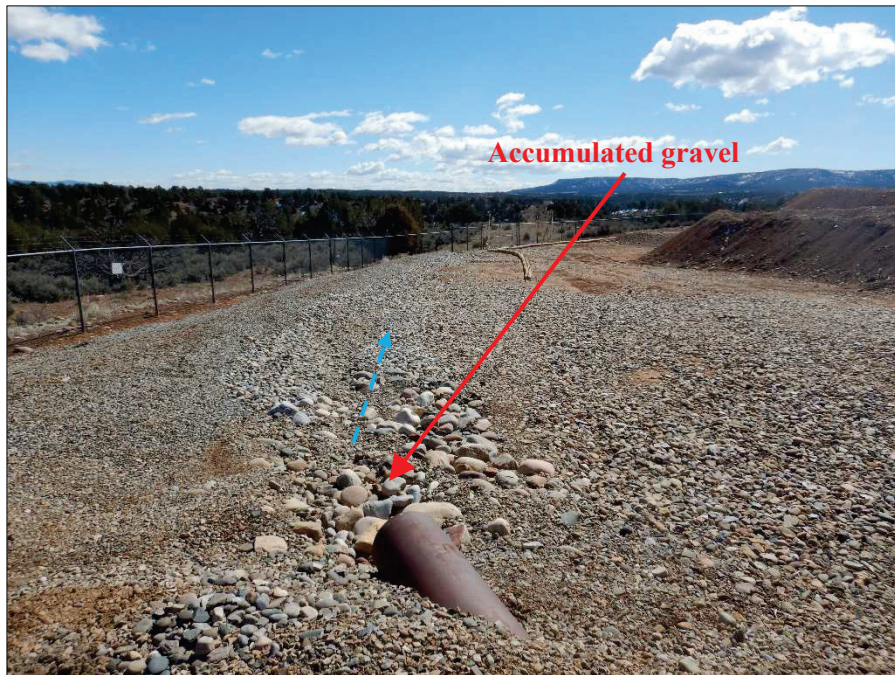


Photograph 83. View, facing south, of culvert in Drainage Area 15 that ultimately drains to Outfall IGP-003. Note accumulated sediment and gravel at the mouth of the pipe.



Photograph 84. View, facing Northwest, of the inlet to culvert in Drainage Area 15, which ultimately drains to Outfall IGP-003. Note accumulated sediment and gravel at the mouth of the pipe.

NPDES Stormwater Industrial and Construction Inspection Report: Appendix A, Photograph Log



Photograph 85. Additional view, facing Southeast, of outlet to culvert beneath road in Drainage Area 15, as referenced in Photograph 84. Note accumulated gravel downgradient from the outlet pipe.

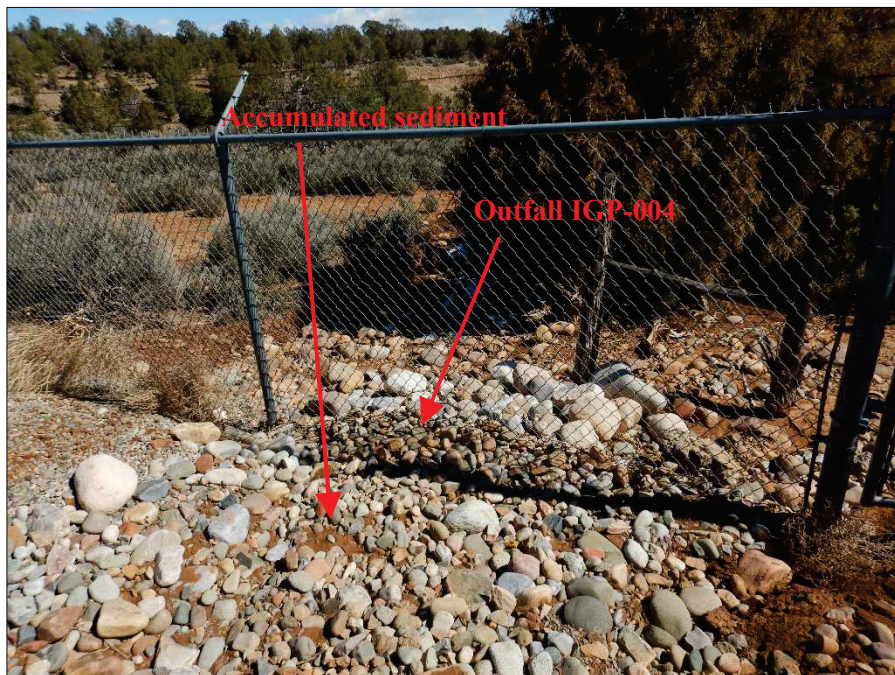


Photograph 86. View, facing Northeast, of Outfall IGP-003.

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Photograph 87. Additional view, facing Northeast, of Outfall IGP-003, as referenced in Photograph 86.



Photograph 88. View, facing East, of Outfall IGP-004. Note sediment accumulated upgradient from the outfall.

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Photograph 89. Additional view, facing East, outside the fence line of Outfall IGP-004, as referenced in Photograph 88.



Photograph 90. Additional view, facing East, outside of the fence line of Outfall IGP-004, as referenced in Photograph 88 and 89.

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Photograph 91. View, facing Northwest, of a drainage ditch leading to Outfall IGP-006.



Photograph 92. Close-up view, facing northwest, of the drainage ditch leading to Outfall IGP-006, as referenced in Photograph 91.

NPDES Stormwater Industrial and Construction Inspection Report: Appendix A, Photograph Log

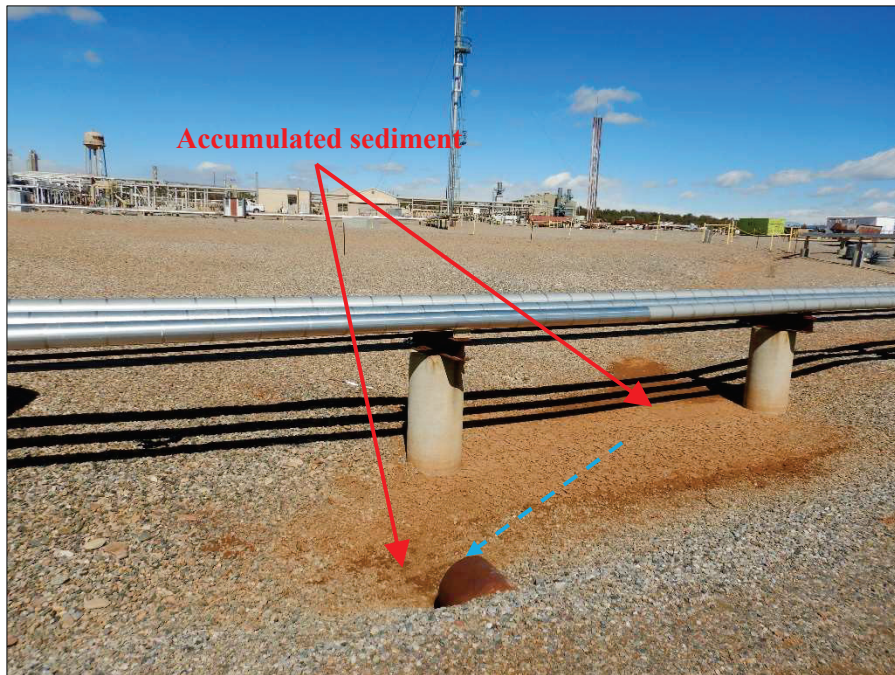


Photograph 93. Close-up view, facing Southeast, of the outlet of a culvert that discharges into the ditch leading to Outfall IGP-006, as referenced in Photographs 91 and 92. Note accumulated sediment and gravel obstructing the culvert outlet pipe.



Photograph 94. View, facing Southeast, of Outfall IGP-006. Note accumulated sediment upgradient from the outfall.

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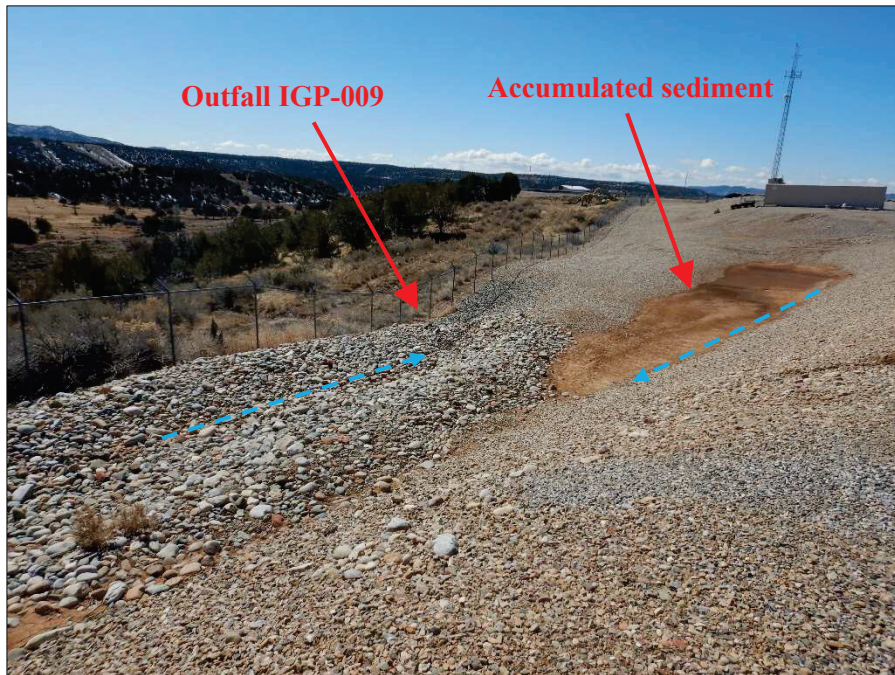


Photograph 95. View, facing Northeast, of inlet of culvert in Drainage Area 9, near West Excess Pond. Note sediment accumulation.

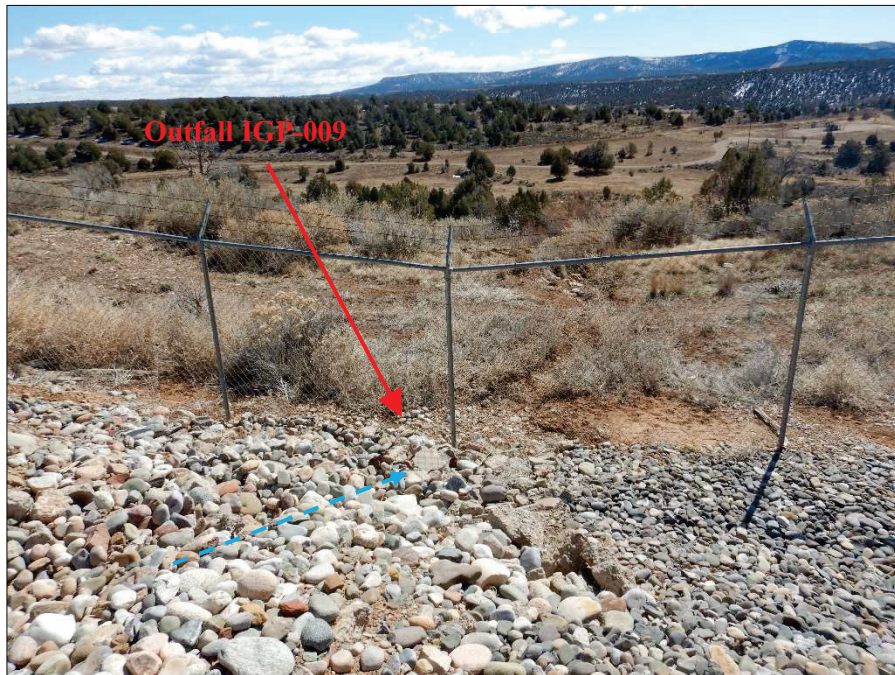


Photograph 96. View, facing South, of a ditch near East Excess Pond which drains to Outfall IGP-009, downstream from the culvert shown in Photograph 95.

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Photograph 97. View, facing Southwest, of Outfall IGP-009. Note accumulated sediment.

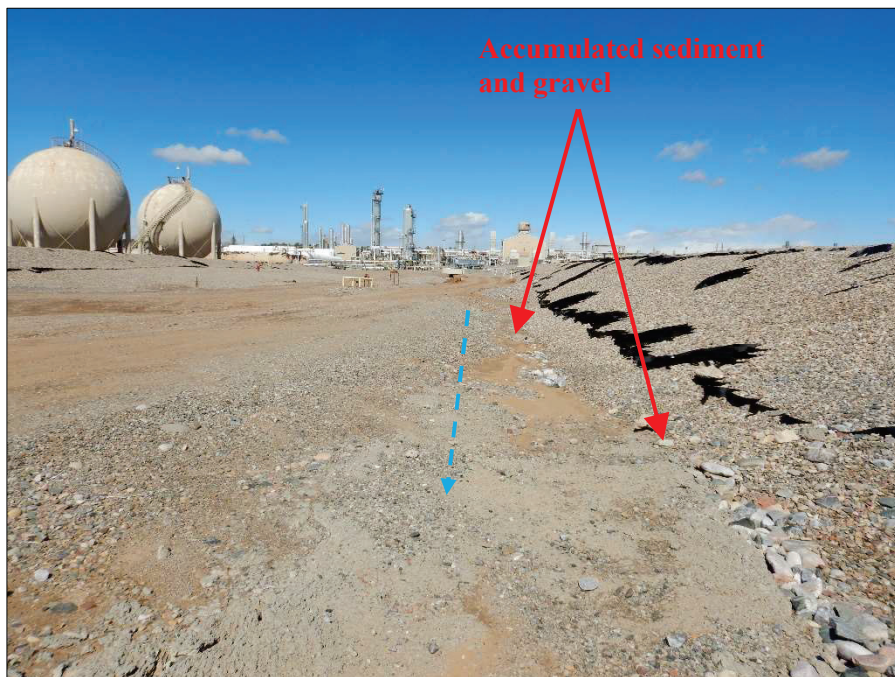


Photograph 98. Additional view, facing South, of Outfall IGP-009, as referenced in Photograph 97.

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Photograph 99. Additional view, facing Southwest, of sediment accumulation near Outfall IGP-009, as referenced in Photographs 97 and 98.



Photograph 100. View, facing North, of ditch along west berm of Clearwater Pond. Note accumulated sediment and gravel.

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Photograph 101. View, facing West, of inlet of culvert into the Facility boneyard. Note accumulated gravel in the ditch upgradient from the culvert.



Photograph 102. View, facing North, of Outfall IGP-011. Note sediment accumulation.

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Photograph 103. Close-up view, facing Southwest, of Outfall IGP-011, as referenced in Photograph 102. Note sediment accumulation.



Photograph 104. Additional view, facing Southwest, of the inside of Outfall IGP-011, as referenced in Photographs 101 and 102. Note sediment accumulation.

NPDES Stormwater Industrial and Construction Inspection Report: Appendix A, Photograph Log



Photograph 105. View, facing North, of straw wattle along fence line in Drainage Area 15, downgradient from an unstabilized bank around the Soil Drying Containment Area. Note deterioration of the straw wattle and sediment accumulation against wattle barriers.



Photograph 106. Additional view, facing Southwest, of straw wattles along fence line in Drainage Area 15, near the Soil Drying Containment Area, downgradient from the area shown in Photograph 105. Note sediment accumulation against the wattles.

NPDES Stormwater Industrial and Construction Inspection Report: Appendix A, Photograph Log



Photograph 107. View, facing Southeast, of new straw wattles near Outfall IGP-004.



Photograph 108. Additional view, facing Southeast, of new straw wattles near Outfall IGP-004, as referenced in Photograph 107.

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Photograph 109. Additional view, facing East, of new straw wattles near Outfall IGP-004, as referenced in Photograph 108. Note straw wattle segments are not overlapping, creating gaps.



Photograph 110. View, facing Southwest, of straw wattles along the southeastern side of South Evaporation Pond. Note sediment accumulation against the wattles.

NPDES Stormwater Industrial and Construction Inspection Report: Appendix A, Photograph Log



Photograph 111. Close-up view, facing Southwest, of straw wattles along southeastern side of South Evaporation Pond, as referenced in Photograph 110. Note deterioration of straw wattles and sediment accumulation against the wattles.



Photograph 112. View, facing Southwest, of a concrete washout area located in Drainage Area 15. The concrete wash out area was more than half full at the time of the inspection.

NPDES Stormwater Industrial and Construction Inspection Report: Appendix B, Exhibit Log

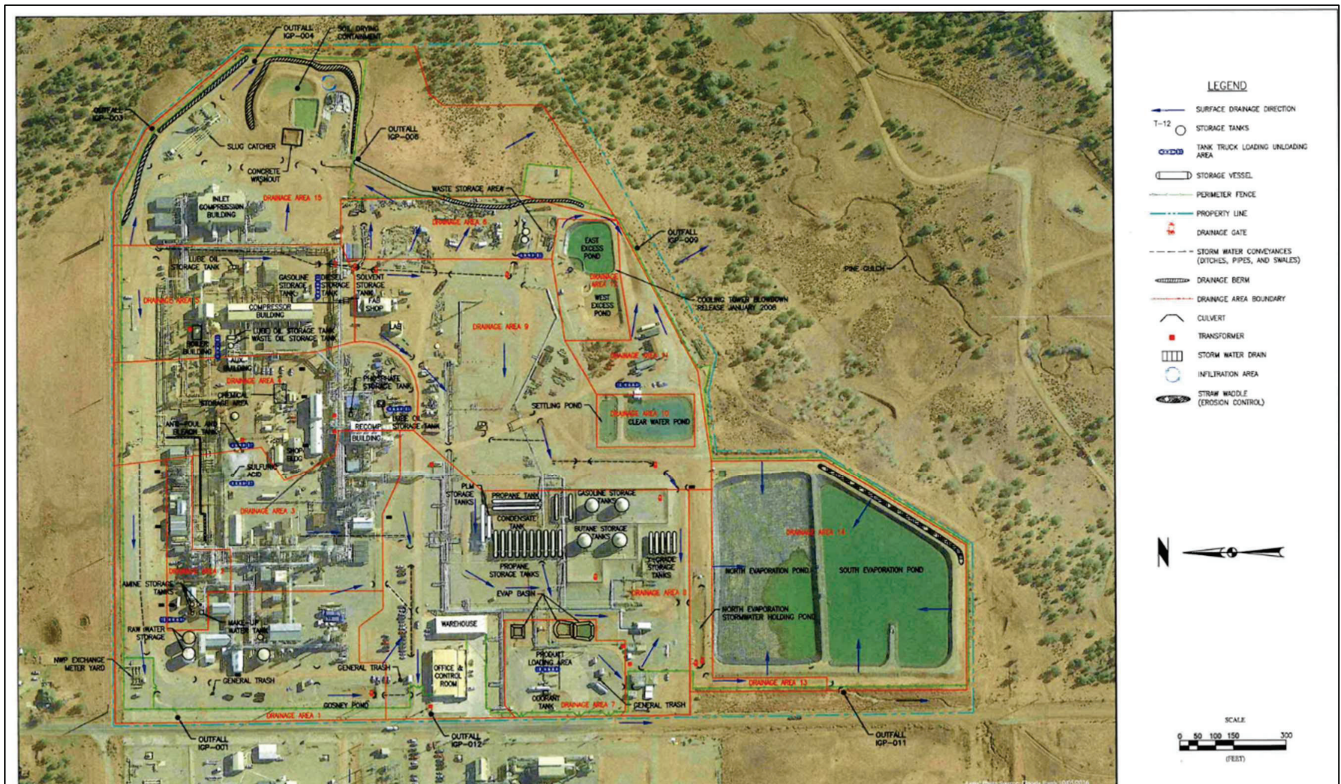


Exhibit 1. The Facility's SWPPP site map.

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

BASIC INFORMATION

Facility Name: New Town Fluid Treating Plant **Facility Location:** 47.985704, -102.349058
RCRA ID: NDR000013169 **Facility Contact:** Dustin Rykhus, 701-572-0107
dustinr@jmacresources.com
Notification Status: Non-notifier
Date of Inspection: September 18, 2024 **Arrival Time:** 7:55 a.m.
Departure Time: 9:35 a.m.
Lead Inspector: Annette Maxwell, U.S. EPA

Other Inspection Attendees:

1. Dustin Rykhus, New Town Fluid Treating Plant
2. Tara Hubner, U.S. EPA
3. Jesse Newland, U.S. EPA
4. Jason Mills, U.S. EPA
5. Rob Beierle, U.S. EPA
6. Bill Schroeder, U.S. EPA
7. Nick Bruno, ERG (EPA Contractor)
8. Cameron Tanaka, ERG
9. Andrew Swingler, ERG
10. Charles Fox, Three Affiliated Tribes - Environmental Division

Type and Purpose of Inspection: Compliance Evaluation Inspection

Facility Type: Oilfield Waste Treating Facility

Applicable Statute to Inspection: RCRA Section 7003

Inspection Type: Announced Inspection

Disclaimer

This report is a summary of observations and information gathered from the facility at the time of the inspection. The information provided does not constitute a final decision on compliance with RCRA regulations, nor is it meant to be a comprehensive summary of all activities and processes conducted at the facility.

FACILITY INFORMATION

Company Operator: IHD Liquids Management, d.b.a. Crude Processing International (CPI)

Facility Name: New Town Fluid Treating Plant

Facility Location: 47.985704, -102.349058

Date of Inspection: September 18, 2024

General Facility and Process Description: The New Town Fluid Treating Plant is a commercial oilfield waste treating facility that receives non-hazardous, RCRA Subtitle C-exempt E&P oilfield waste delivered by truck for storage and treatment. Onsite disposal does not occur at this facility. Equipment includes, but is not limited to, tanks, centrifuge equipment, and solids storage bays.

REPORT SCOPE

The scope of this report is limited to observations and/or concerns regarding potential for impact to the environment as may be related to RCRA Section 7003, including potential for harm to wildlife. Sampling activities conducted under RCRA Section 3007 that occurred contemporaneous to the inspection were beyond the scope of this report. For that sampling activity, sample results will be provided to the facility by the EPA when they become available.

TOUR INFORMATION

An opening conference in which I presented my inspector credentials was held with Mr. Rykhus upon arrival at the site. He provided an overview of facility operations, and we proceeded on a site walk-through.

Areas of the facility toured:

- Tank battery area
- Centrifuge area
- Solids storage area

A site map is included in Attachment 1 – Site Map. Photos collected as part of this inspection are included in Attachment 2 – Photo Log.

Data Collected and Observations:

The following information was obtained verbally from Mr. Rykhus unless otherwise specified.

During the inspection, Mr. Rykhus said the site is currently open by appointment and has only received about 50 trucks so far this year. He described the process for receiving trucks as follows: incoming trucks are checked for radiation, then routed based on the type of truck/load. Tankers are unloaded under the shale shaker, routing solids to a shaker bin and liquids to tanks. Hydrovac trucks are unloaded to a separate bin on the east side of the facility, with liquids then pumped over to the shakers and routed through the same process. Lime and flyash are added to solids before they are sent to a landfill. Radiation is checked via Geiger counter to determine which landfill solids will be routed to. An example of solids that might be of higher radiation is tank bottoms. Approximately 1/3 of solids are routed to local landfills in North Dakota, approximately 1/3 are routed to a landfill in Montana, and the remaining 1/3 are routed to the Clean Harbors Deer Trail landfill, all based upon radiation limits. Loads are also sometimes sent to Texas for landfilling.

Facility Name: New Town Fluid Treating Plant

Facility Location: 47.985704, -102.349058

Date of Inspection: September 18, 2024

Liquids are routed through a three-stage centrifuge, from which additional solids are removed and collected in a concrete bin adjacent to the centrifuge.

An onsite boiler is used to heat freshwater, which is then used to heat tanks to help with separation of oil and water.

Of 16 onsite tanks, three are used to hold oil, one for freshwater, and the remaining 12 hold produced water.

Prior to leaving the site by truck for injection disposal at an underground injection control (salt water disposal) well, water is run through filter socks, which are subsequently picked up by Oilfield Waste Logistics (OWL) for disposal at the Deer Trail landfill in Colorado.

During the walk-through, I observed that the tank area was equipped with a secondary containment berm. Mr. Rykhus said the area also had a liner.

A few feet north side of the shaker bin, I observed a deceased bird that appeared to be covered in oil. See Attachment 2, photo 10. It was unclear whether oil in the nearby shaker bin (see Attachment 2, photo 14) had caused the mortality. Mr. Rykhus said that facility SOPs say to remove any liquids in the bins by transferring them to the tanks, and that the bins should not store any liquids.

At the tank battery area, I observed no spills or standing/pooled oil on the ground in the secondary containment or on the ground in other areas of the facility.

CLOSING CONFERENCE

A closing conference was conducted with Mr. Rykhus before the end of the inspection. During the closing conference, I said that I would be writing an inspection report, with a goal of providing that to the facility within 70 days.

ADDITIONAL INFORMATION

Additional information regarding management of NORM/TENORM received and generated at the facility may be helpful to clarify how solids with varying radiation levels are identified so that they can be kept separate to allow for appropriate disposal.

Oily waste that is not physically restricted from access by birds and other wildlife is a concern because of the potential for injury or mortality. Oily waste contains constituents known to be toxic to human health and the environment, including benzene, toluene, ethyl benzene, and xylene. Oily waste also presents other hazards to wildlife that encounter it, including drowning, dehydration, starvation, predation, and hyper- and hypothermia.

Facility Name: New Town Fluid Treating Plant

Facility Location: 47.985704, -102.349058

Date of Inspection: September 18, 2024

A deceased bird at the site at the time of the inspection with an oily appearance on its feathers indicates that oily waste management practices at the facility presents a potential for harm to wildlife. A source of liquid, oily waste that was not physically restricted from wildlife access was the shaker bin, which held oily liquid in its northern section near where the bird was found.

SIGNATURE

Inspector: ANNETTE MAXWELL Digitally signed by ANNETTE
MAXWELL
Date: 2024.11.07 14:41:32 -07'00'

Annette Maxwell, RCRA Inspector

Supervisor: Susarla, Sridhar Digitally signed by Susarla,
Sridhar
Date: 2024.11.07 15:17:36 -07'00'

Sri Susarla, Manager

RCRA and OPA Enforcement Branch

Enforcement and Compliance Assurance Division

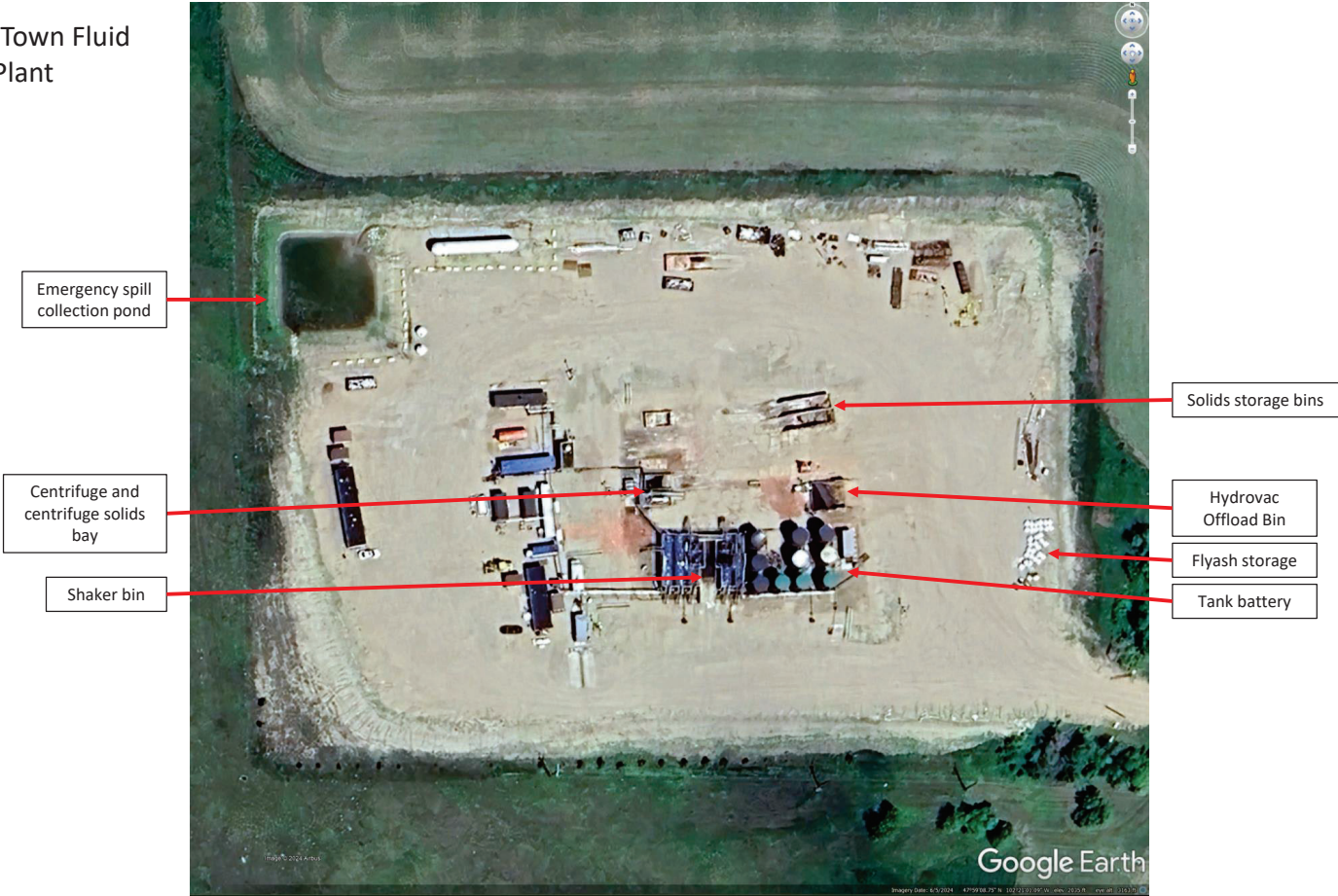
Attachments

Attachment 1 – Site Map

Attachment 2 – Photo Log

Attachment 1 – Site Map

IHD New Town Fluid Treating Plant



Attachment 2 – Photograph Log

Facility Name: IHD New Town Fluid Treating Plant #1

Facility Location: 47.985704, -102.349058

Date of Inspection: September 18, 2024

ATTACHMENT 2 – PHOTO LOG

Photographer: Annette Maxwell

Camera Model and ID: iPad SS8392

Photo 1: IMG_0275.jpg, 9/18/2024, 8:18 a.m. – overview photo of facility, taken near southeast corner of tank battery facing west/northwest.



Facility Name: IHD New Town Fluid Treating Plant #1

Facility Location: 47.985704, -102.349058

Date of Inspection: September 18, 2024

Photo 2: IMG_0276.jpg, 9/18/2024, 8:19 a.m. – photo of tank battery area shown in photo 1.



Facility Name: IHD New Town Fluid Treating Plant #1

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Date of Inspection: September 18, 2024

Photo 3: IMG_0277.jpg, 9/18/2024, 8:20 a.m. – photo of the tank area, taken facing southwest.



Facility Name: IHD New Town Fluid Treating Plant #1

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Photo 4: IMG_0278.jpg, 9/18/2024, 8:24 a.m. – overview photo taken from the north side of the tank battery, facing southeast.



Facility Name: IHD New Town Fluid Treating Plant #1

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Photo 5: IMG_0279.jpg, 9/18/2024, 8:24 a.m. – photo panned right from photo 4.



Facility Name: IHD New Town Fluid Treating Plant #1

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Photo 6: IMG_0280.jpg, 9/18/2024, 8:24 a.m. – photo panned right from photo 5.



Facility Name: IHD New Town Fluid Treating Plant #1

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Photo 7: IMG_0281.jpg, 9/18/2024, 8:24 a.m. – photo panned right from photo 6.



Facility Name: IHD New Town Fluid Treating Plant #1

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Photo 8: IMG_0282.jpg, 9/18/2024, 8:24 a.m. – photo panned right from photo 7.



Facility Name: IHD New Town Fluid Treating Plant #1

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Photo 9: IMG_0283.jpg, 9/18/2024, 8:32 a.m. – photo of the solids bay located north of the tank battery.



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Photo 10: IMG_0284.jpg, 9/18/2024, 8:36 a.m. – photo of deceased bird that appeared to be covered in oil. Photo location is a few feet north of the solids settling bay.



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Photo 11: IMG_0285.jpg, 9/18/2024, 9:16 a.m. – overview photo of facility from the north wide facing southeast.



Facility Name: IHD New Town Fluid Treating Plant #1

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Photo 12: IMG_0286.jpg, 9/18/2024, 9:16 a.m. – photo panned right from photo 11.



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Photo 13: IMG_0287.jpg, 9/18/2024, 9:16 a.m. – photo panned right from photo 12, with the centrifuge and its associated solids storage bay visible at left, an additional solids storage bay, and the facility boiler and other equipment visible to right.



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Photo 14: IMG_0288.jpg, 9/18/2024, 9:24 a.m. – photo of the shaker bin.



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Photo 15: IMG_0289.jpg, 9/18/2024, 9:24 a.m. – photo of the same area shown in photo 14.



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Date of Inspection: September 18, 2024

Photo 16: IMG_0290.jpg, 9/18/2024, 9:26 a.m. – photo of bulker bags of flyash product.

