

UNPERMITTED INDUSTRIAL FACILITY STORMWATER INSPECTION CHECKLIST

Inspection Date	May 16, 2024	
Time	Entry: 11:30 AM	Exit: 12:30 PM
Weather Conditions	80°F's and overcast	
Media/Program	Water – CWA § 301, 402 – Industrial SW/NEC	
Operator Name:	Schlumberger NV	
Facility or Site Name:	Cameron Drilling Services Distribution Center	
Permit ID or Tracking #:	N/A; No permit at the time of the inspection	
SIC Code:	Outdoor activity observed included storage of new and used drilling parts and loading and unloading of trucks which are industrial activities consistent with SIC Code 5084 – Industrial Machinery and Equipment. The Facility did not provide a SIC code.	
Facility Address:	4800 W Greens Rd	
(city, state, zip code)	Houston, TX 77066	
Geographic Coordinates:	29.94538°, -95.49057°	
Mailing address:	4800 W Greens Rd	
(city, state, zip code)	Houston, TX 77066	
County:	Harris County	
Regular Days/Hours of Operation:	Days/Hours of operation were not listed online.	
# of Employees at location:	300-400 workers	
Size of Facility (in acres):	Approximately 23 acres total with approximately 14 acres of outdoor activity	
Receiving Water(s):	Greens Bayou Creek, located approximately 300 feet north of the Facility	
Date facility est. @ location:	2014	
Onsite Representatives:		
Name: Tamiqua Kelly	Title: Health Safety Environment Manager	Phone: 281-755-0098
	Email: tkelly2@slb.com	
Authorized Official: Contacted? ☒ Yes ☐ No		
Name: Tamiqua Kelly	Title: Health Safety Environment Manager	Phone: 281-755-0098
	Email: tkelly2@slb.com	
Additional Personnel Participating in Inspection:		
Name: N/A	Title: N/A	
Inspector(s):	Title:	Company:
Christopher Pardo	Lead Inspector	Eastern Research Group, Inc.
Ryan Marrero-Vila	Inspector	Eastern Research Group, Inc.
Ivy Koberlein	Inspector	Environmental Protection Agency, Headquarters
Sharron Crayton	Inspector	Environmental Protection Agency, Region 6
Inspection Report Author:		

Name: Ryan Marrero-Vila	Signature: <i>Ryan Marrero</i>	Date: 7/4/2024
Supervisor Review:		
Name:	Signature: <i>Carol Johnson</i>	Date: 07/10/2024

SECTION I – INTRODUCTION

Purpose of the Inspection

The purpose of the inspection was to determine compliance with the industrial stormwater requirements under §§ 301 and 402(p) of the Clean Water Act (CWA) and its implementing regulations found at 40 Code of Federal Regulations (CFR) Part 122.26. The inspection was unannounced and consisted of interviewing Facility representatives, recording field observations, and taking photographs to document site conditions throughout the Facility at the time of the inspection.

Opening Conference

- 1) Brief narrative documenting those present, introductions, presentation of credentials, and explanation of the purpose of the inspection.

On May 16, 2024, a U.S. Environmental Protection Agency (EPA) contractor, Eastern Research Group, Inc. (ERG), conducted an industrial stormwater non-filer inspection at the Schlumberger NV - Cameron Drilling Services Distribution Center located in Houston, Texas (Facility). Ivy Koberlein of EPA Headquarters, Sharron Crayton of EPA Region 6, and Christopher Pardo and Ryan Marrero-Vila of ERG (collectively, EPA Inspection Team) met with the Facility representative, Tamiqua Kelly. The EPA Inspection Team presented their credentials and explained that it was EPA's understanding that the facility did not have an industrial stormwater permit. The EPA Inspection Team explained they were onsite to conduct a Clean Water Act stormwater inspection, which includes observing the current operations of the facility and assessing the potential for stormwater discharges from the facility.

The weather at the time of the inspection was overcast followed by light rain and approximately 84°F. According to precipitation data from the National Oceanic and Atmospheric Administration (NOAA), the Houston, Texas area received 0.15 inches of rain the day of and no rain the day prior to the inspection.

- 2) Credentials presented to: Tamiqua Kelly
- 3) Facility acknowledged receiving previous outreach materials or correspondence on Permit requirements?
☐ Yes ☒ No Describe: N/A
- 4) Facility has been individually notified by permit authority or EPA that it is subject to stormwater requirements? ☐ Yes ☒ No Describe: N/A

FACILITY'S OPERATION & PRODUCT DESCRIPTION

Description of business and industrial activities occurring throughout the site. (Include operator's description and note any documentation that further establishes SIC code (permit applications, reports, business registries, website...)).

The Facility is a drilling equipment distribution center, owned and operated by Schlumberger NV. The Facility receives and sells pieces of industrial drilling equipment to commercial customers. According to the Facility Representative, no industrial manufacturing or processing operations occur at the Facility. The Facility stores drilling equipment in the Facility warehouse and larger pieces of drilling equipment were stored uncovered outside on the concrete surface surrounding the warehouse.

Other industrial facilities owned/operated by same business entity? ☒ Yes ☐ No **Describe:**

Cameron Drilling Services is a subsidiary company of Schlumberger NV, which is comprised of eight major subsidiary companies including Cameron Drilling Services. According to the company website, Schlumberger NV is in international oilfield services company with worldwide operations in 120 different countries: <https://www.slb.com/companies/cameron>.

SECTION II – OBSERVATIONS**SITE EVALUATION**

Pollutant Sources	Note location, quantity/size, design issues, any operation and maintenance (O&M) deficiencies (including the nature and extent), potential pollutants, and evidence of exposure to stormwater. Are Best Management Practices (BMPs) in place to minimize or eliminate stormwater discharges from industrial activities?
Loading/Unloading Operations	The Facility is comprised of a large concrete pad used for vehicle parking and outdoor storage of drilling equipment and one (1) warehouse with approximately one hundred (100) truck loading docks along the eastern and western walls. The EPA Inspection team observed approximately ten (10) semi-truck trailers being loaded at the time of the inspection. Drilling equipment is loaded on and off the semi-truck trailers for transport to commercial customers.
Industrial Manufacturing/Processing Operations	According to the Facility representative, the Facility primarily serves as a drilling equipment distribution center. No industrial manufacturing or processing operations were observed or reported.
Industrial Machinery & Equipment Storage	The Facility uses one (1) high-capacity forklift, which is stored uncovered outside, to crush and compact solid waste within dumpsters on the eastern side of the warehouse [refer to Appendix B, Photo Log (Photograph 16)]. The Facility has approximately one hundred (100) standard forklifts, which are used to move and shelve materials inside the warehouse.
Storage of Industrial Materials or Products	The Facility uses the paved surface surrounding the warehouse as storage for used and new pieces of drilling equipment.

SITE EVALUATION	
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	The southeastern portion of the Facility was primarily used for storing used drilling equipment over wooden pallets [refer to Appendix B, Photo Log (Photographs 1, 4-6)]. Rust was observed on uncovered drilling equipment stored in this location [refer to Appendix B, Photo Log (Photograph 6)]. The northeastern portion of the Facility was used for storing wooden crates containing new drilling equipment [refer to Appendix B, Photo Log (Photographs 19-22)]. The western portion of the Facility was used for storing uncovered new, used, and rusting drilling equipment within wooden crates directly on the paved surface, and on top of wooden pallets [refer to Appendix B, Photo Log (Photographs 30-36)].
Liquid Storage (e.g., Tanks, Liquid Storage Drums)	According to the Facility Representative no liquid storage of any kind, including used vehicle maintenance oils or gasoline, is stored at the Facility. The EPA Inspection team observed one (1) rusted 5-gallon container of industrial silicone grease stored in the southeastern portion of the Facility amongst cardboard debris and old drilling equipment [refer to Appendix B, Photo Log (Photograph 7)].
Waste Storage/Disposal Areas (solid and/or hazardous)	The EPA Inspection Team observed four (4) 20-yard solid waste roll-off dumpsters which were stored on the paved concrete pad around the Facility warehouse. These solid waste dumpsters contained miscellaneous scrap metal parts, cardboard debris, and plastic bags [refer to Appendix B, Photo Log (Photographs 17-19 and 34)]. All waste collection roll-offs dumpsters were uncovered. Additionally, the EPA Inspection Team observed two (2) covered and locked 2-yard dumpsters along the eastern side of the warehouse [refer to Appendix B, Photo Log (Photograph 9)]. The EPA Inspection Team nor the Facility representative could confirm the contents of these dumpsters. The EPA Inspection Team observed two (2) 4-yard waste collection bins on the western side of the warehouse which contained cardboard debris, plastic bottles, coffee cups, and miscellaneous organic debris [refer to Appendix B, Photo Log (Photographs 38-40)]. One (1) of the two (2) waste collection bins had a permanent lid attached to its sides but was not fully covered at the time of the inspection. One (1) uncovered 32-gallon waste collection bin was also observed on the eastern

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	side of the warehouse alongside the power generator unit containing cardboard debris and rubber hoses [refer to Appendix B, Photo Log (Photograph 11)]. The collection bin had no permanent lid.
Waste Treatment Facilities (e.g., Pretreatment Systems)	None observed or reported at the Facility.
Fueling Stations/Equipment Maintenance Areas & Cleaning Areas	No fueling stations or equipment maintenance areas were observed at the Facility. According to the Facility Representative, a third-party vendor services the forklifts within the large storage warehouse.
Sediment & Erosion Controls	The EPA Inspection Team observed the Facility to be permanently stabilized with landscaping or impervious surfaces.
Spills/Leaks Handling	The EPA Inspection Team observed one (1) spill kit outside at the southeastern portion of the Facility near where old/used drilling equipment was stored [refer to Appendix B, Photo Log (Photograph 1)].
Outside Shelters	“Temporary (Date Established _____)” Permanent None observed or reported at the Facility.
Evidence of non-stormwater sources/discharges (allowable if permitted under MSGP)?	The EPA Inspection Team observed condensate flowing from a power generator unit stored outside towards a stormwater drain located on the pavement in the eastern portion of the Facility [refer to Appendix B, Photo Log (Photographs 8 and 12)].
Evidence of process wastewater sources/discharges?	Evidence of process wastewater sources/discharges was not observed or reported during the inspection.

OUTFALL, STORMWATER DISCHARGE & RECEIVING WATER OBSERVATIONS	
Number and description of each potential Stormwater Discharge Point from the Facility	The EPA Inspection Team During observed three (3) stormwater discharge points from the Facility: 1) Discharge Point #1 was in the northeast corner of the Facility [refer to Appendix B, Photo Log (Photograph 24)]. Stormwater from the series of stormwater collection drains in the northeastern portion of the Facility would convey from an outfall into a large offsite stormwater conveyance system which bordered the northern portion of the Facility. 2) Discharge Point #2 was in the northwest corner of the Facility [refer to Appendix B, Photo Log (Photograph 27)]. Stormwater from the series of

OUTFALL, STORMWATER DISCHARGE & RECEIVING WATER OBSERVATIONS	
	stormwater drains in the northwestern portion of the Facility would convey from an outfall into a large offsite stormwater conveyance system which bordered the northern portion of the Facility. 3) Discharge Point #3 was in the southwest corner of the Facility. Stormwater from the series of stormwater drains in the southwestern portion of the Facility would convey from an outfall into a vegetated conveyance channel to the west of the Facility which then conveyed northward towards the large offsite stormwater conveyance system which bordered the northern portion of the Facility.
Evidence of pollutants migrating offsite (stains, deposits, ponding) at discharge points, into receiving waters or in MS4	The EPA Inspection Team did not observe evidence of pollutants migrating offsite into receiving waters or an MS4.
Evidence of Non-stormwater Discharges leaving site (authorized or unauthorized)	The EPA Inspection Team observed evidence of an authorized non-stormwater discharge conveying into a stormwater drain located on the paved surface in the eastern portion of the Facility [refer to <u>Appendix B, Photo Log (Photographs 8 and 12)</u>]. See the above section labeled <u>Evidence of non-stormwater sources/discharges (allowable if permitted under MSGP)</u> for more information on this non-stormwater discharge source.
Description of general gradients/slopes onsite, all apparent discharge points, and discharge pathway from Facility to Receiving Water or MS4 (storm drains, channel, swale, ditches, driveway, pipes, & etc.)	The EPA Inspection Team observed that the ground surface throughout the Facility was paved with concrete. The EPA Inspection Team observed the Facility sloped towards the series of stormwater drains located on all sides of the large storage warehouse [refer to <u>Appendix B, Photo Log (Photographs 2, 8, 12, 13, 20, 22, 23, 28, 29, and 32)</u>]. The Facility has three (3) stormwater discharge points that convey stormwater offsite, via stormwater culvert, into a large stormwater conveyance system which runs along the northern and western borders of the Facility. See the above section labeled <u>Number and description of each potential Stormwater Discharge Point from the Facility</u> for more information on each discharge point. From the stormwater conveyance system, aerial imagery indicates there is an offsite culvert located approximately 150 feet to the north of the Facility which conveys stormwater from the conveyance system into Greens Bayou Creek located approximately 300 feet to the north of the Facility.

SECTION III – AREAS OF CONCERN

- 1) At the time of the inspection, the EPA Inspection Team identified the following at the Facility:

- a. The Facility is a drilling equipment distribution center, owned and operated by Schlumberger NV. Industrial activities were consistent with SIC Code 5084 – Industrial Machinery and Equipment. The Facility conducts most operations inside the warehouse, and only larger pieces of drilling equipment were stored uncovered outside. SIC Code 5084 is not regulated under 40 C.F.R. § 122.26 for stormwater discharges associated with industrial activity.
 - b. The Facility’s outdoor areas were used for storing new and used drilling equipment on the pavement surrounding the storage warehouse.
 - c. At the time of the inspection, the Facility did not have coverage under the 2021 Multi-General Stormwater Permit (MSGP) for Stormwater Discharges Associated with Industrial Activity.
 - d. Facility stormwater, from areas used for industrial activities, discharges to a large offsite stormwater conveyance system bordering the north portion of the Facility, and a vegetated conveyance system which runs along the western border of the Facility that conveys to the offsite stormwater conveyance system. From the stormwater conveyance system, stormwater is discharged from an offsite culvert and directed to Greens Bayou Creek located approximately 300 feet to the north of the Facility.
- 2) The EPA Inspection Team observed the southeastern portion of the Facility was primarily used for storing used drilling equipment over wooden pallets [refer to Appendix B, Photo Log (Photographs 1, 4-6)]. Drilling equipment was stored uncovered and many of the pieces were observed with rust [refer to Appendix B, Photo Log (Photograph 6)]. The EPA Inspection Team observed additional used drilling equipment with rust was stored uncovered on wooden pallets in the western portion of the Facility [refer to Appendix B, Photo Log (Photographs 35 and 36)].
 - 3) The EPA Inspection Team observed four (4) 20-yard solid waste roll-off dumpsters without permanent lids/covers along the eastern side of the warehouse, two (2) 4-yard waste collection bins on the western side of the warehouse with only one (1) containing a lid that was not fully covered, and one (1) uncovered 32-gallon waste collection bin with no lid in front of the power generator unit on the eastern side of the warehouse [refer to Appendix B, Photo Log (Photographs 11, 17-19, 34, and 38-40)].
 - 4) The EPA Inspection Team observed one (1) uncovered and rusted 5-gallon container of industrial silicone grease stored in the southeastern portion of the Facility amongst cardboard debris and old drilling equipment [refer to Appendix B, Photo Log (Photograph 7)].

SECTION IV – LIST OF APPENDICES

Appendix A – Aerial Location

Appendix B – Photograph Log