

Region 6 - Enforcement & Compliance Assurance Division

INSPECTION REPORT

Inspection Date(s):	10/08/2024	
Media Program:	Water (CWA)	
Regulatory Program(s)	Water (CWA) Brine Program (Oil & Gas inspection)	
Company Name:	Eubanks, James and Mike (J&M)	
Facility Name:	Howard "B" 1 SWD Tank Battery	
Facility Physical Location:	From Highway 7B in Sandy Land, then left onto Union Co Rd 459, off an oil lease road at 33.33997, -92.713382	
(city, state, zip code)	Smackover, AR, 71762	
Mailing address:	615 Broadway	
(city, state, zip code)	Smackover, AR, 71762	
County/Parish:	Union County	
Facility Phone Number	870-725-2907	
Facility Contact:	James Eubanks rick@jrmorgancpa.com	Person Responsible for Operation
FRS Number:	N/A	
Identification/Permit Number:	ARU002252	
Media Identifier Number:	N/A	
NAICS:	211111	
SIC:	1311	
Personnel participating in inspection:		
Kerri McCabe (lead)	EPA / Region 6 ECDW	Inspector / Enforcement Officer
Michael Blaha	EPA / Region 6 ECDW	Inspector / Enforcement Officer
Uma Lad	EPA / Region 6 ECDW	Inspector / Enforcement Officer
EPA Lead Inspector Signature/Date		
	Kerri McCabe	Date
Supervisor Signature/Date		
	Jeanne Eckhart	Date

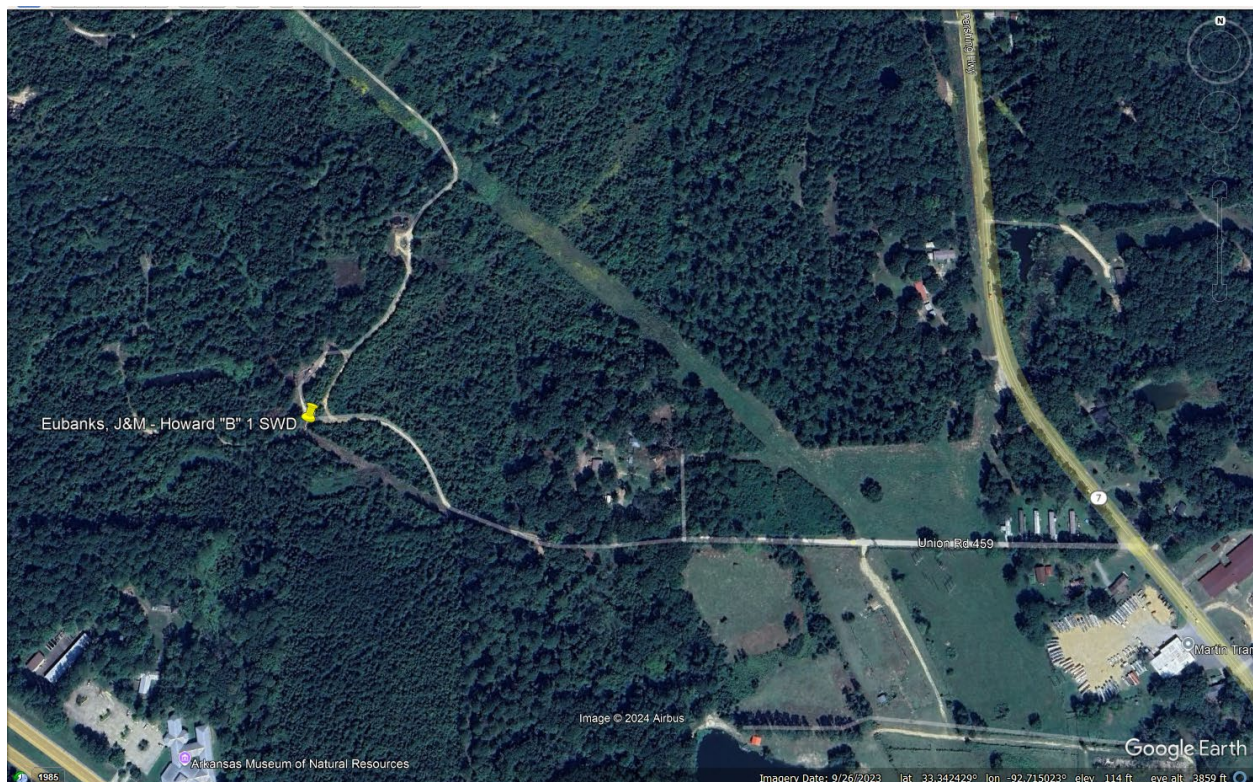
Section I – INTRODUCTION

PURPOSE OF THE INSPECTION

EPA Region 6 inspectors Kerri McCabe (lead), Michael Blaha, and Uma Lad arrived at the Eubanks, James and Mike (J&M) / Howard "B" 1 SWD Tank Battery, located from Highway 7B in Sandy Land, then left onto Union Co Rd 459, off an oil lease road at 33.33997, -92.713382; at 1015 on 10/08/2024 for an unannounced inspection. No facility representatives were 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 James and Mike (J&M) Eubanks / Howard "B" 1 SWD Tank Battery, which contained two (2) tank batteries, five (5) storage/seperator tanks for crude oil and saltwater, and one (1) Saltwater Disposal (SWD) well.



Map 1. Aerial imagery (Google Earth dated 09/26/2023) of the James and Mike (J&M) Eubanks – Howard "B" 1 SWD Tank Battery.

Section II - OBSERVATIONS

I observed the James and Mike (J&M) Eubanks – Howard "B" 1 SWD Tank Battery, signage, and associated secondary containments, storage tanks, and saltwater disposal (SWD) well; see Appendix 1 (Photographs Log), see Photo No. 1 and No. 2. For additional GPS location and photo metadata, see Appendix 1.

I observed one of two tank batteries (TB #1) at the facility, see Photo No. 3.

I observed production/transfer lines at TB #1 without catchment buckets, see Photo No. 4.

I observed active leaks of crude oil from tanks inside TB #1, see Photo No. 5 through No. 9.

I observed the drainpipe and the cap for TB #1, see Photo No. 10 and No. 11.

I observed two of two tank batteries (TB #2) at the facility, see Photo No. 12.

I observed loose oil inside TB #2, see Photo No. 13 and No. 15.

I observed the separator with residual oil stains on the outside of the tank, see Photo No. 14.

I observed the drainpipe and the cap for TB #2, see Photo No. 16 and No. 17.

I observed the flowpath of contaminated stormwater originating from TB #2, see Photo No. 18 and No. 19.

I observed the signage and the SWD well associated with the tank batteries, see Photo No. 20 and No. 21.

I observed areas of miscellaneous solid waste around the SWD and the tank batteries, see Photo No. 22 and No. 23.

Section III – AREAS OF CONCERN

No closing conference was held due to no personnel with James and Mike (J&M) Eubanks being present during the inspection. Areas of concern at the time of the inspection include the following:

- Illegible signage at the tank batteries for the facility,
- Loose, residual oil inside both tank batteries associated with the facility,
- Transfer pipes outside secondary containment without catchment buckets,
- Active leaks from tanks inside secondary containment for the facility,
- Drainpipes for the secondary containment without caps,
- Evidence of contaminated stormwater discharge from the facility, and
- Miscellaneous solid waste of petroleum-based containers and other oilfield wastes onsite.

Section IV – FOLLOW UP

Inspector will conduct follow-up phone calls with the company representative(s) over the coming weeks and months to ensure areas of concern are properly addressed.

Section V – LIST OF APPENDICES

Appendix 1 – Photograph Log – 23 photos taken 10/08/2024.

Appendix 1

Photograph Log 23 Photos



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 1

Location: J & M Eubanks – Howard “B” 1 SWD Tank Battery in Sandy Land at 33.339997, -92.713382		
City: Smackover	County/Parish: Union	State: Arkansas



Photo File Name: PA08-0037

Orientation: NW

Date of Photo: 10/08/2024

Time of Photo: 1045

Latitude: 33.340526

Longitude: -92.713348

Photographer: Kerri McCabe

Description: Looking NW, this photo shows signage at the Howard “B” 1 SWD Tank Battery.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 2

Location: J & M Eubanks – Howard “B” 1 SWD Tank Battery in Sandy Land at 33.339997, -92.713382		
City: Smackover	County/Parish: Union	State: Arkansas



Photo File Name: PA08-0038

Orientation: NE

Date of Photo: 10/08/2024

Time of Photo: 1045

Latitude: 33.340420

Longitude: -92.713409

Photographer: Kerri McCabe

Description: Looking NE, this photo shows an overview of the Howard “B” 1 SWD Tank Battery.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 3

Location: J & M Eubanks – Howard “B” 1 SWD Tank Battery in Sandy Land at 33.339997, -92.713382		
City: Smackover	County/Parish: Union	State: Arkansas



Photo File Name: PA08-0039

Orientation: E

Date of Photo: 10/08/2024

Time of Photo: 1046

Latitude: 33.340539

Longitude: -92.713324

Photographer: Kerri McCabe

Description: Looking E, this photo shows an overview of one of the two tank batteries (TB) onsite; three tanks were inside containment (TB #1).



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 4

Location: J & M Eubanks – Howard “B” 1 SWD Tank Battery in Sandy Land at 33.339997, -92.713382		
City: Smackover	County/Parish: Union	State: Arkansas



Photo File Name: PA08-0040

Orientation: E-SE

Date of Photo: 10/08/2024

Time of Photo: 1046

Latitude: 33.340610

Longitude: -92.713268

Photographer: Kerri McCabe

Description: Looking E-SE, this photo shows two production/transfer lines outside secondary containment with no catch buckets at valves (TB #1).



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 5

Location: J & M Eubanks – Howard “B” 1 SWD Tank Battery in Sandy Land at 33.339997, -92.713382		
City: Smackover	County/Parish: Union	State: Arkansas



Photo File Name: PA08-0041

Orientation: NE

Date of Photo: 10/08/2024

Time of Photo: 1046

Latitude: 33.340557

Longitude: -92.713369

Photographer: Kerri McCabe

Description: Looking E-SE, this photo shows loose oil inside secondary containment (TB #1).



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 6

Location: J & M Eubanks – Howard “B” 1 SWD Tank Battery in Sandy Land at 33.339997, -92.713382		
City: Smackover	County/Parish: Union	State: Arkansas



Photo File Name: PA08-0042

Orientation: NE

Date of Photo: 10/08/2024

Time of Photo: 1046

Latitude: 33.340557

Longitude: -92.713369

Photographer: Kerri McCabe

Description: Looking NE, this photo shows Tank 3280, from Photo No. 5, with the loose oil.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 7

Location: J & M Eubanks – Howard “B” 1 SWD Tank Battery in Sandy Land at 33.339997, -92.713382		
City: Smackover	County/Parish: Union	State: Arkansas



Photo File Name: PA08-0043

Orientation: W-SW

Date of Photo: 10/08/2024

Time of Photo: 1047

Latitude: 33.340584

Longitude: -92.713349

Photographer: Kerri McCabe

Description: Looking W-SW, this photo shows loose oil from an additional tank (TB #1).



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 8

Location: J & M Eubanks – Howard “B” 1 SWD Tank Battery in Sandy Land at 33.339997, -92.713382		
City: Smackover	County/Parish: Union	State: Arkansas



Photo File Name: PA08-0044

Orientation: NW

Date of Photo: 10/08/2024

Time of Photo: 1047

Latitude: 33.340584

Longitude: -92.713349

Photographer: Kerri McCabe

Description: Looking NW, this photo shows a closeup of the loose oil between the two tanks in Photo No. 7.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 9

Location: J & M Eubanks – Howard “B” 1 SWD Tank Battery in Sandy Land at 33.339997, -92.713382		
City: Smackover	County/Parish: Union	State: Arkansas



Photo File Name: PA08-0045

Orientation: E-SE

Date of Photo: 10/08/2024

Time of Photo: 1047

Latitude: 33.340584

Longitude: -92.713349

Photographer: Kerri McCabe

Description: Looking E-SE, this photo shows the flowpath for the loose oil (TB #1).



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 10

Location: J & M Eubanks – Howard “B” 1 SWD Tank Battery in Sandy Land at 33.339997, -92.713382		
City: Smackover	County/Parish: Union	State: Arkansas



Photo File Name: PA08-0046

Orientation: N-NW

Date of Photo: 10/08/2024

Time of Photo: 1048

Latitude: 33.340508

Longitude: -92.713388

Photographer: Kerri McCabe

Description: Looking N-NW, this photo shows the drainpipe for TB #1.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 11

Location: J & M Eubanks – Howard “B” 1 SWD Tank Battery in Sandy Land at 33.339997, -92.713382		
City: Smackover	County/Parish: Union	State: Arkansas



Photo File Name: PA08-0047

Orientation: N-NE

Date of Photo: 10/08/2024

Time of Photo: 1048

Latitude: 33.340508

Longitude: -92.713388

Photographer: Kerri McCabe

Description: Looking N-NE, this photo shows a closeup of the drainpipe cap from Photo No. 10; cap was loose during inspection.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 12

Location: J & M Eubanks – Howard “B” 1 SWD Tank Battery in Sandy Land at 33.339997, -92.713382		
City: Smackover	County/Parish: Union	State: Arkansas



Photo File Name: PA08-0048

Orientation: E-NE

Date of Photo: 10/08/2024

Time of Photo: 1048

Latitude: 33.340492

Longitude: -92.713486

Photographer: Kerri McCabe

Description: Looking E-NE, this photo shows an overview of one of the two tank batteries (TB) onsite; two tanks were inside containment (TB #2).



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 13

Location: J & M Eubanks – Howard “B” 1 SWD Tank Battery in Sandy Land at 33.339997, -92.713382		
City: Smackover	County/Parish: Union	State: Arkansas



Photo File Name: PA08-0049

Orientation: E-NE

Date of Photo: 10/08/2024

Time of Photo: 1048

Latitude: 33.340497

Longitude: -92.713520

Photographer: Kerri McCabe

Description: Looking E-NE, this photo shows loose oil inside secondary containment (TB #2).



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 14

Location: J & M Eubanks – Howard “B” 1 SWD Tank Battery in Sandy Land at 33.339997, -92.713382		
City: Smackover	County/Parish: Union	State: Arkansas



Photo File Name: PA08-0051

Orientation: E-NE

Date of Photo: 10/08/2024

Time of Photo: 1049

Latitude: 33.340497

Longitude: -92.713520

Photographer: Kerri McCabe

Description: Looking E-NE, this photo shows a previous overflow at one of the tanks (TB #2).



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 15

Location: J & M Eubanks – Howard “B” 1 SWD Tank Battery in Sandy Land at 33.339997, -92.713382		
City: Smackover	County/Parish: Union	State: Arkansas



Photo File Name: PA08-0052

Orientation: NE

Date of Photo: 10/08/2024

Time of Photo: 1049

Latitude: 33.340465

Longitude: -92.713573

Photographer: Kerri McCabe

Description: Looking NE, this photo shows loose oil inside secondary containment (TB #2).



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 16

Location: J & M Eubanks – Howard “B” 1 SWD Tank Battery in Sandy Land at 33.339997, -92.713382		
City: Smackover	County/Parish: Union	State: Arkansas



Photo File Name: PA08-0053

Orientation: NW

Date of Photo: 10/08/2024

Time of Photo: 1049

Latitude: 33.340432

Longitude: -92.713660

Photographer: Kerri McCabe

Description: Looking NW, this photo shows the cap for the drainpipe on top of the secondary containment berm (TB #2).



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 17

Location: J & M Eubanks – Howard “B” 1 SWD Tank Battery in Sandy Land at 33.339997, -92.713382		
City: Smackover	County/Parish: Union	State: Arkansas



Photo File Name: PA08-0054

Orientation: SW

Date of Photo: 10/08/2024

Time of Photo: 1050

Latitude: 33.340432

Longitude: -92.713660

Photographer: Kerri McCabe

Description: Looking SW, this photo shows the open drainpipe from Photo No. 16.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 18

Location: J & M Eubanks – Howard “B” 1 SWD Tank Battery in Sandy Land at 33.339997, -92.713382		
City: Smackover	County/Parish: Union	State: Arkansas



Photo File Name: PA08-0055

Orientation: NE

Date of Photo: 10/08/2024

Time of Photo: 1050

Latitude: 33.340473

Longitude: -92.713706

Photographer: Kerri McCabe

Description: Looking NE, this photo shows a flowpath from the drainpipe for TB #2 into the surrounding riparian of an unnamed tributary (UT) of Holmes Creek.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 19

Location: J & M Eubanks – Howard “B” 1 SWD Tank Battery in Sandy Land at 33.339997, -92.713382		
City: Smackover	County/Parish: Union	State: Arkansas



Photo File Name: PA08-0056

Orientation: NE

Date of Photo: 10/08/2024

Time of Photo: 1050

Latitude: 33.340473

Longitude: -92.713706

Photographer: Kerri McCabe

Description: Looking NE, this photo shows an additional view of the flowpath from Photo No. 18; note loose oil and dead vegetation within flowpath.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 20

Location: J & M Eubanks – Howard "B" 1 SWD Tank Battery in Sandy Land at 33.339997, -92.713382		
City: Smackover	County/Parish: Union	State: Arkansas

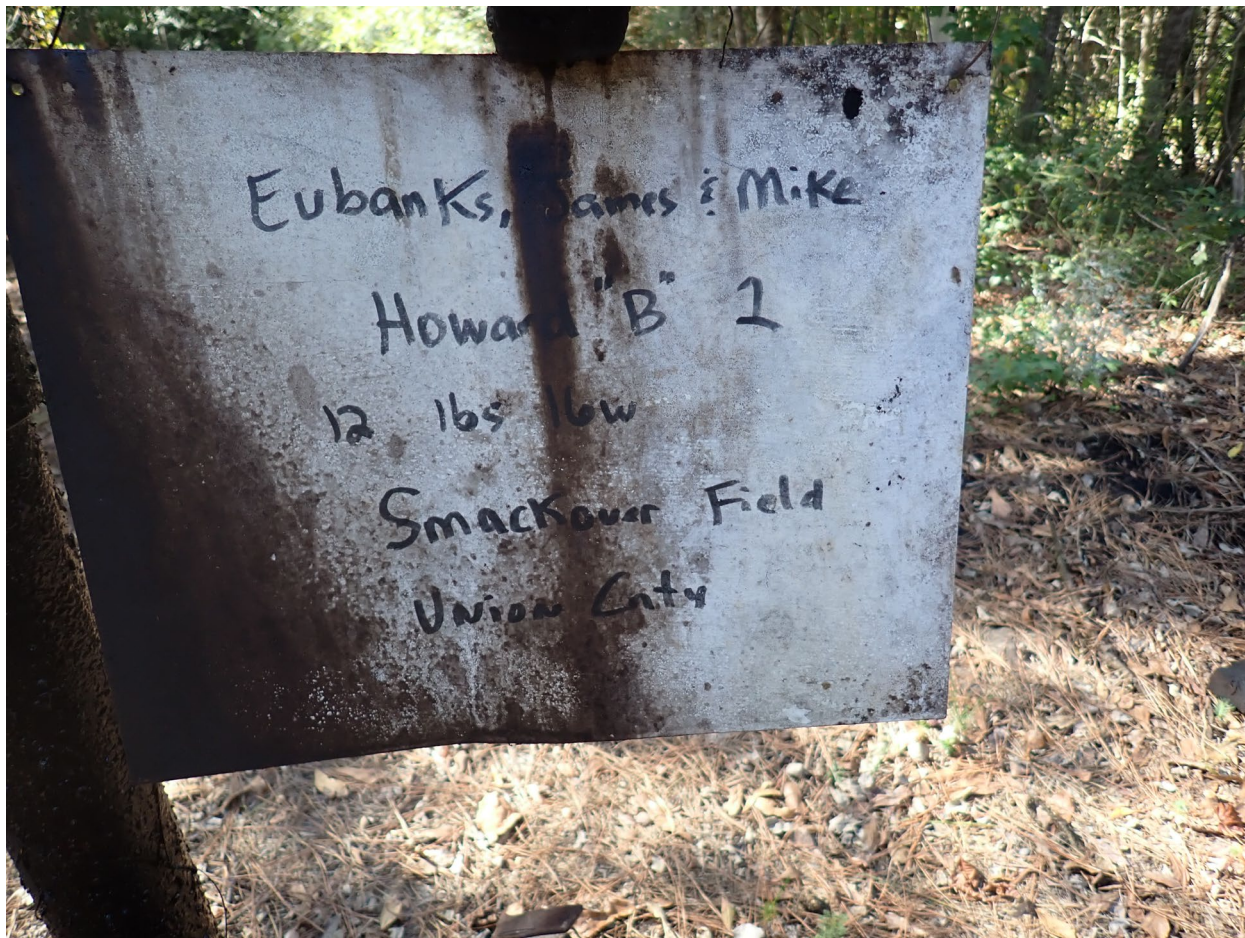


Photo File Name: PA08-0057

Orientation: N-NW

Date of Photo: 10/08/2024

Time of Photo: 1053

Latitude: 33.339997

Longitude: -92.713382

Photographer: Kerri McCabe

Description: Looking N-NW, this photo shows the signage at the Howard "B" 1 SWD well.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 21

Location: J & M Eubanks – Howard “B” 1 SWD Tank Battery in Sandy Land at 33.339997, -92.713382		
City: Smackover	County/Parish: Union	State: Arkansas



Photo File Name: PA08-0058

Orientation: E-NE

Date of Photo: 10/08/2024

Time of Photo: 1053

Latitude: 33.339997

Longitude: -92.713382

Photographer: Kerri McCabe

Description: Looking E-NE, this photo shows an overview of the SWD adjacent to the two tank batteries.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 22

Location: J & M Eubanks – Howard “B” 1 SWD Tank Battery in Sandy Land at 33.339997, -92.713382		
City: Smackover	County/Parish: Union	State: Arkansas



Photo File Name: PA08-0059

Orientation: SE

Date of Photo: 10/08/2024

Time of Photo: 1053

Latitude: 33.340003

Longitude: -92.713453

Photographer: Kerri McCabe

Description: Looking SE, this photo shows a waste pit adjacent to the SWD in Photo No. 21.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 23

Location: J & M Eubanks – Howard “B” 1 SWD Tank Battery in Sandy Land at 33.339997, -92.713382		
City: Smackover	County/Parish: Union	State: Arkansas



Photo File Name: PA08-0060

Orientation: W

Date of Photo: 10/08/2024

Time of Photo: 1055

Latitude: 33.340556

Longitude: -92.713253

Photographer: Kerri McCabe

Description: Looking W, this photo shows miscellaneous petroleum-related containers onsite.