

Region 6 - Enforcement & Compliance Assurance Division

INSPECTION REPORT

Inspection Date(s):	03/05/2025	
Media Program:	Water (CWA)	
Regulatory Program(s)	Water (CWA) Brine Program (Oil & Gas inspection)	
Company Name:	Smith, Roger G	
Facility Name:	Troy Tokio Unit Tank Battery	
Facility Physical Location:	From Willisville, State Highway 371 North, right on Hwy 76, right on Nevark Rd, and then left onto an oilfield lease road at 33.535099, -93.156694.	
(city, state, zip code)	Willisville, AR 71730	
Mailing address:	2515 North Vine	
(city, state, zip code)	Magnolia, AR 71753	
County/Parish:	Nevada County	
Facility Phone Number	870-234-4421	
Facility Contact:	Roger Smith (870-234-4421)	Person Responsible for Operation
	Dalton Smith (Representative) daltonsmith12@gmail.com	
FRS Number:	N/A	
Identification/Permit Number:	ARU002288	
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
EPA Lead Inspector Signature/Date		
	Kerri McCabe	Date
Supervisor Signature/Date		
	Jeanne Eckhart	Date

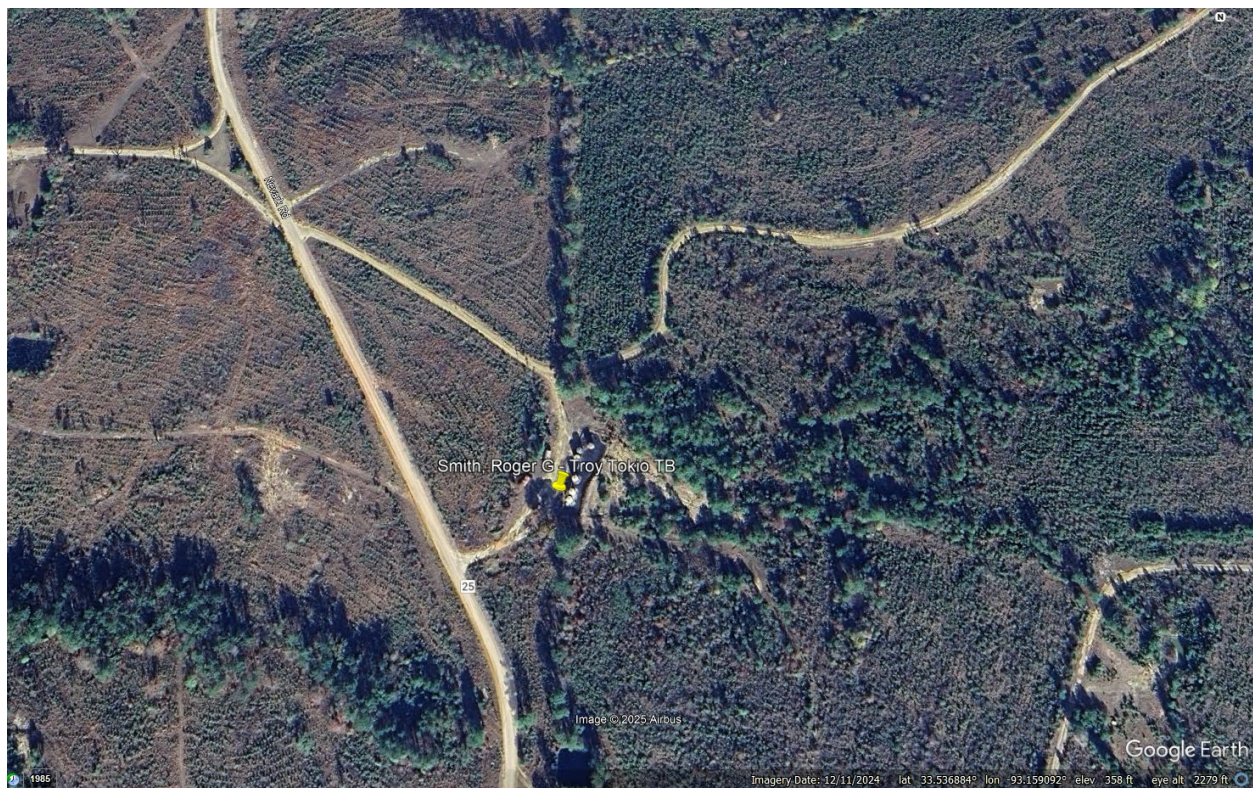
Section I – INTRODUCTION

PURPOSE OF THE INSPECTION

EPA Region 6 inspectors Kerri McCabe (lead) and Michael Blaha arrived at the Smith, Roger G / Troy Tokio Unit Tank Battery ("facility") located from State Highway 371 North, right on Hwy 76, right on Nevark Rd, and then left onto an oilfield lease road at 33.535099, -93.156694 in Willisville, Nevada County, Arkansas; at 1215 on 03/05/2025 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 Smith, Roger G / Troy Tokio Unit Tank Battery facility, which contains four (4) tanks for crude oil and saltwater storage, two (2) separators/treaters, and five (5) miscellaneous tanks outside secondary containment that appeared to be out of service.



Map 1. Aerial imagery (Google Earth dated 12/11/2024) of the Smith, Roger G / Troy Tokio Unit Tank Battery facility.

Section II - OBSERVATIONS

I observed the facility signage, secondary containment, pipes and valves, storage tanks, and separators/treaters; see Appendix 1 (Photographs Log), Photos No. 1 through No. 3. For additional GPS location and photo metadata, see Appendix 1.

I observed product transfer lines outside secondary containment without catchment buckets, see Photos No. 2 and No. 3.

I observed the sump area, the drainpipe, and a pump for the secondary containment, see Photos No. 4 through No. 6.

I observed loose crude oil and salt water inside secondary containment, see Photos No. 7 and No. 8.

I observed a low area in the berm of the secondary containment, see Photo No. 9.

I observed an active leak of crude oil from one of the tanks inside secondary containment, see Photos No. 10 and No. 11.

I observed the drainage area around the secondary containment, flowlines directed toward the saltwater disposal (SWD) well, and bare soil and dead vegetation from a potential saltwater release, see Photos No. 12 through No. 15.

I observed five (5) miscellaneous tanks outside secondary containment that appeared to be out of service, see Photos No. 16 and No. 17.

Section III – AREAS OF CONCERN

No closing conference was held due to no personnel with Smith, Roger G being present during the inspection. Areas of concern at the time of the inspection include the following:

- Product transfer lines outside secondary containment without catchment buckets (Photos No. 2 and No. 3),
- Loose and residual crude oil and saltwater inside secondary containment (Photos No. 4, No. 7 and No. 8),
- The drainpipe for secondary containment without a cap (Photo No. 6),
- A low area in the berm for the secondary containment (Photo No. 9),
- An active leak of crude oil from a tank inside secondary containment (Photos No. 10 and No. 11),
- Bare, erodible soils and dead vegetation from a potential saltwater release (Photos No. 12 through No. 15), and
- Miscellaneous tanks outside secondary containment that appear to be out of service and not properly labeled (Photos No. 16 and No. 17).

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 – 17 photos taken 03/05/2025.

Appendix 1

Photograph Log 17 Photos



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 1

Location: From Willisville (Nevark Community), State Hwy 371, right on Hwy 76, right on Nevark Rd, then left onto an oilfield lease road at 33.535099, -93.156694.

City: Willisville (Nevark)

County/Parish: Nevada

State: Arkansas



Photo File Name: 100-0705

Orientation: 130° SE

Date of Photo: 03/05/2025

Time of Photo: 1223

Latitude: 33.535217

Longitude: -93.156667

Photographer: Kerri McCabe

Description: Looking SE, this photo shows the signage for the Troy Tokio Unit Tank Battery ("facility").



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 2

Location: From Willisville (Nevark Community), State Hwy 371, right on Hwy 76, right on Nevark Rd, then left onto an oilfield lease road at 33.535099, -93.156694.

City: Willisville (Nevark)

County/Parish: Nevada

State: Arkansas



Photo File Name: 100-0706

Orientation: 71° ENE

Date of Photo: 03/05/2025

Time of Photo: 1223

Latitude: 33.535117

Longitude: -93.156733

Photographer: Kerri McCabe

Description: Looking ENE, this photo shows an overview of the facility.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 3

Location: From Willisville (Nevark Community), State Hwy 371, right on Hwy 76, right on Nevark Rd, then left onto an oilfield lease road at 33.535099, -93.156694.

City: Willisville (Nevark)

County/Parish: Nevada

State: Arkansas



Photo File Name: 100-0707

Orientation: 44° NE

Date of Photo: 03/05/2025

Time of Photo: 1223

Latitude: 33.535133

Longitude: -93.156750

Photographer: Kerri McCabe

Description: Looking NE, this photo shows a side view of the inside of the secondary containment.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 4

Location: From Willisville (Nevark Community), State Hwy 371, right on Hwy 76, right on Nevark Rd, then left onto an oilfield lease road at 33.535099, -93.156694.

City: Willisville (Nevark)

County/Parish: Nevada

State: Arkansas



Photo File Name: 100-0708

Orientation: 49° NE

Date of Photo: 03/05/2025

Time of Photo: 1223

Latitude: 33.535067

Longitude: -93.156633

Photographer: Kerri McCabe

Description: Looking NE, this photo shows a view of the backside and the sump area inside the secondary containment.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 5

Location: From Willisville (Nevark Community), State Hwy 371, right on Hwy 76, right on Nevark Rd, then left onto an oilfield lease road at 33.535099, -93.156694.

City: Willisville (Nevark)

County/Parish: Nevada

State: Arkansas



Photo File Name: 100-0709

Orientation: 67° ENE

Date of Photo: 03/05/2025

Time of Photo: 1224

Latitude: 33.535083

Longitude: -93.156600

Photographer: Kerri McCabe

Description: Looking ENE, this photo shows a pump used at the drainpipe for the sump area of the secondary containment.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 6

Location: From Willisville (Nevark Community), State Hwy 371, right on Hwy 76, right on Nevark Rd, then left onto an oilfield lease road at 33.535099, -93.156694.

City: Willisville (Nevark)

County/Parish: Nevada

State: Arkansas



Photo File Name: 100-0710

Orientation: 358° N

Date of Photo: 03/05/2025

Time of Photo: 1224

Latitude: 33.535033

Longitude: -93.156517

Photographer: Kerri McCabe

Description: Looking N, this photo shows the drainpipe for secondary containment with a closed valve and no cap.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 7

Location: From Willisville (Nevark Community), State Hwy 371, right on Hwy 76, right on Nevark Rd, then left onto an oilfield lease road at 33.535099, -93.156694.

City: Willisville (Nevark)

County/Parish: Nevada

State: Arkansas



Photo File Name: 100-0712

Orientation: 18° NNE

Date of Photo: 03/05/2025

Time of Photo: 1225

Latitude: 33.535217

Longitude: -93.156500

Photographer: Kerri McCabe

Description: Looking NNE, this photo shows loose crude oil and saltwater inside the secondary containment.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 8

Location: From Willisville (Nevark Community), State Hwy 371, right on Hwy 76, right on Nevark Rd, then left onto an oilfield lease road at 33.535099, -93.156694.

City: Willisville (Nevark)

County/Parish: Nevada

State: Arkansas



Photo File Name: 100-0716

Orientation: 358° N

Date of Photo: 03/05/2025

Time of Photo: 1226

Latitude: 33.535350

Longitude: -93.156383

Photographer: Kerri McCabe

Description: Looking N, this photo shows the pump used for the saltwater disposal (SWD) injection well.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 9

Location: From Willisville (Nevark Community), State Hwy 371, right on Hwy 76, right on Nevark Rd, then left onto an oilfield lease road at 33.535099, -93.156694.

City: Willisville (Nevark)

County/Parish: Nevada

State: Arkansas



Photo File Name: 100-0717

Orientation: 324° NW

Date of Photo: 03/05/2025

Time of Photo: 1227

Latitude: 33.535483

Longitude: -93.156450

Photographer: Kerri McCabe

Description: Looking NW, this photo shows a low area in the berm for the secondary containment.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 10

Location: From Willisville (Nevark Community), State Hwy 371, right on Hwy 76, right on Nevark Rd, then left onto an oilfield lease road at 33.535099, -93.156694.

City: Willisville (Nevark)

County/Parish: Nevada

State: Arkansas



Photo File Name: 100-0719

Orientation: 179° S

Date of Photo: 03/05/2025

Time of Photo: 1227

Latitude: 33.535433

Longitude: -93.156517

Photographer: Kerri McCabe

Description: Looking S, this photo shows a frontside view inside the secondary containment with an active crude oil leak.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 11

Location: From Willisville (Nevark Community), State Hwy 371, right on Hwy 76, right on Nevark Rd, then left onto an oilfield lease road at 33.535099, -93.156694.

City: Willisville (Nevark)

County/Parish: Nevada

State: Arkansas



Photo File Name: 100-0720

Orientation: 42° NE

Date of Photo: 03/05/2025

Time of Photo: 1227

Latitude: 33.535333

Longitude: -93.156600

Photographer: Kerri McCabe

Description: Looking NE, this photo shows a closeup of the active crude oil leak from Photo No. 10.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 12

Location: From Willisville (Nevark Community), State Hwy 371, right on Hwy 76, right on Nevark Rd, then left onto an oilfield lease road at 33.535099, -93.156694.

City: Willisville (Nevark)

County/Parish: Nevada

State: Arkansas



Photo File Name: 100-0718

Orientation: 86° E

Date of Photo: 03/05/2025

Time of Photo: 1227

Latitude: 33.535517

Longitude: -93.156550

Photographer: Kerri McCabe

Description: Looking E, this photo shows the drainage area around the tank battery with dead vegetation in the background.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 13

Location: From Willisville (Nevark Community), State Hwy 371, right on Hwy 76, right on Nevark Rd, then left onto an oilfield lease road at 33.535099, -93.156694.

City: Willisville (Nevark)

County/Parish: Nevada

State: Arkansas



Photo File Name: 100-0722

Orientation: 112° ESE

Date of Photo: 03/05/2025

Time of Photo: 1228

Latitude: 33.535483

Longitude: -93.156483

Photographer: Kerri McCabe

Description: Looking ESE, this photo shows a closeup view of the dead vegetation from Photo No. 12.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 14

Location: From Willisville (Nevark Community), State Hwy 371, right on Hwy 76, right on Nevark Rd, then left onto an oilfield lease road at 33.535099, -93.156694.

City: Willisville (Nevark)

County/Parish: Nevada

State: Arkansas



Photo File Name: 100-0723

Orientation: 113° ESE

Date of Photo: 03/05/2025

Time of Photo: 1229

Latitude: 33.535217

Longitude: -93.156150

Photographer: Kerri McCabe

Description: Looking ESE, this photo shows a historic saltwater release within the flowline area for the SWD injection well.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 15

Location: From Willisville (Nevark Community), State Hwy 371, right on Hwy 76, right on Nevark Rd, then left onto an oilfield lease road at 33.535099, -93.156694.

City: Willisville (Nevark)

County/Parish: Nevada

State: Arkansas



Photo File Name: 100-0724

Orientation: 339° NNW

Date of Photo: 03/05/2025

Time of Photo: 1237

Latitude: 33.535033

Longitude: -93.155717

Photographer: Kerri McCabe

Description: Looking NNW, this photo shows an additional view of the drainage area and the historic saltwater release from Photo No. 14.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 16

Location: From Willisville (Nevark Community), State Hwy 371, right on Hwy 76, right on Nevark Rd, then left onto an oilfield lease road at 33.535099, -93.156694.

City: Willisville (Nevark)

County/Parish: Nevada

State: Arkansas



Photo File Name: 100-0725

Orientation: 18° NNE

Date of Photo: 03/05/2025

Time of Photo: 1241

Latitude: 33.535200

Longitude: -93.156617

Photographer: Kerri McCabe

Description: Looking NNE, this photo shows two (2) treaters and a storage tank that appear to be out of service.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 17

Location: From Willisville (Nevark Community), State Hwy 371, right on Hwy 76, right on Nevark Rd, then left onto an oilfield lease road at 33.535099, -93.156694.

City: Willisville (Nevark)

County/Parish: Nevada

State: Arkansas



Photo File Name: 100-0726

Orientation: 263° W

Date of Photo: 03/05/2025

Time of Photo: 1241

Latitude: 33.535200

Longitude: -93.156600

Photographer: Kerri McCabe

Description: Looking W, this photo shows an additional two (2) storage tanks outside secondary containment that appear to be out of service.