

# Wyoming Department of Environmental Quality

## WYPDES Oil Treater Inspection

### “What to Expect When You’re Inspected”



#### ***Oil Treater Inspection Expectations***

There are 264 permitted oil treater (oil production units) facilities in the state of Wyoming. Oil treater inspections are scheduled with as little pre-warning as possible to preserve the integrity of the inspection. Oil treaters are inspected at least once every five years to determine compliance with permit conditions. A WYPDES inspection of an oil treater facility consists of two parts: a records review and site inspection. Below is a summary of what occurs during both.

#### ***Records Inspection:***

A records inspection is a quality assurance/quality control (QA/QC) audit conducted to determine if the information being reported to the regulatory agent is correct. The discharge monitoring reports (DMRs) submitted by the permittee must accurately reflect the analytical results reported by the lab on the associated laboratory reports and/or bench sheets. The audit also ensures that samples were collected and analyzed utilizing standard methods to produce reliable results.

The inspector will request an audit for approximately the last 18 months to two years of documentation. Documents necessary to maintaining compliance with the WYPDES permit must be maintained on site or at the nearest local field office for a minimum of three years from creation. All records must be made available to DEQ staff upon request.

1. A copy of the current WYPDES discharge permit will be requested to confirm compliance.
2. Copies of DMRs will be compared to their corresponding laboratory report forms or bench sheets to confirm reported results.
3. Calibration records for pH and specific conductance meters will be observed to ensure that the meters are being appropriately calibrated and maintained.
4. Determine how flow is measured and review calibration records if applicable.
5. Chain of custody (COC) forms will be reviewed to confirm sample dates and times, analysis requested, preservatives used, and temperature of samples upon receipt at the contract lab. The date and time of receipt of samples at the contract lab will also be reviewed to confirm parameter holding times.
6. Correspondence with the state including exceedance notifications, letters of violation and/or notices of violation and past inspection reports will also be reviewed.
7. Flow records and any photos relating to the status or quality of the discharge.

The following is a list of common non-compliance issues encountered during a record inspection:

1. Lacking 3 years of DMR and laboratory records, bench sheets, and calibration records.
2. Exceedance of sample holding times.
3. Miss reporting for various parameters.
4. Lack of follow-up for past parameter exceedances.
5. Flow data information incorrect with the photo documentation.
6. Laboratory reports lacking one or more of the following: a) The exact place, date and time of sampling; b) The dates and times the analyses were performed; c) The person(s) who performed the analyses and collected the samples; and d) The analytical techniques or methods used.

### ***Compliance Inspection:***

Field inspections are conducted to determine compliance with permit conditions. The following list describes the type of information the inspector would collect when conducting a field compliance inspection at an oil treater facility:

1. Ensure the facility identification sign is located at the discharge location.
2. Observe the overall condition of facility (Good Housekeeping).
3. Document end of pipe discharge/no discharge.
4. Observe outfall structures (freefall and one discharge pipe).
5. Observe the conditions below the outfall structure: observe downstream for erosion, staining and deposition.
6. Collect pH, specific conductance and temperature of discharged effluent. Collect sample(s) at the monitoring points according to permit requirements.
7. Document the appearance of sampled water (smell, color, turbidity, sheen, or foam).
8. End of pipe flow information.
9. Note the condition of treatment ponds to include berms, presence of oil in ponds, netting and skimmers over the treatment pond.
10. Check for leaks and seeps in/or around pond embankments.
11. Photographs and GPS taken for documentation.

The following is a list of non-compliance issues encountered during field compliance inspections at oil treater facilities:

1. Missing facility identification sign.
2. Facility lacking freefall at the end of pipe.
3. Outfall not accessible for sampling.
4. More than one discharge pipe.

5. Downstream erosion and staining (oil sheen on the discharged water, channel embankment and vegetation).
6. Area(s) of leaks or seeps from pond embankments and piping.