

# Inspection Report

## Chief's Order No. 2015-29

### Division of Oil and Gas Resources Management (DOGRM)

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**Site Name:** Petta Cambridge Facility

**Site Visit Date:** 08/15/2018

**Location:** Guernsey County, Cambridge TWP,  
Site access: 713 North Third St. Cambridge

**Owner:** Petta Enterprises, LLC Ohio

**Weather:** approx. 80°F and partially cloudy

**Arrival/Departure:** 9:50 a.m./12:30 pm

**In attendance:** DOGRM: Charles McCracken, Radiation Safety & Beth Pratt,  
Engineering  
Petta Enterprises: Bob Applegate, RSO & Josh Long, Site Mgr.,

#### Observations:

- The facility at 713 North Third St. is operating during the visit.
- Several employees are working. All personnel are wearing hard hats, but protective clothing was limited. Waste material was accumulated on the employee's clothing, skin, and hard hats.
- Storage and processing within the building consisted of three open half-rounds for settling, 8 vertical 400 bbl tanks, and 3 solidification pits.
- Two of the solidification pits were filled to about 12 to 18 inches from the top of the pit with flowable sludge. The third pit was mostly solidified. The hoe was not operating during the visit.
- Josh Long stated that the leak detection observation ports for the pits are checked daily for liquids. The results are not documented.
- The floor of the building was wet and had been cleaned. No waste substances were noted outside of the primary containers.
- One of the 400 bbl vertical tanks was laying on it's side with the hatch open and an opening cut into the top of the tank. The tank contained about several ft of hardened cement in the bottom. Petta was in the process of hammering out the hardened waste cement. No one was working on the tank during the visit.
- Solids ready for disposal are managed by Waste Management. Reportedly, when the waste in a pit is adequately solidified and ready for disposal, three samples of the waste per pit are taken and tested. The WM trucks are loaded and WM disposes of the waste according to the analytical data. WM is responsible for managing the disposal on behalf of Petta.

- Piping that connects the outside storage tank field and the building is installed but not connected. The upright piping was capped at both ends. Any transfer of liquids from the outside storage to the inside storage is done by truck.
- Exterior roll-off and clam shell storage yard (south on site) had minimal stormwater within the secondary containment. The stormwater was collected at the back of the containment. No spillage was noted in the secondary containment. The individual secondary containments were labeled as 1 through 4. 1 & 2 are for storage of wastes waiting to be processed. 3 & 4 were for truck parking and were not well maintained.
- Reportedly the secondary containment and the boxes are inspected daily by Petta staff. This is not documented.
- A radiological assessment was conducted by using a Ludlum model 3019  $\mu$ R meter SN:25012981, cal. due date 10/31/2018. Site background was 6 - 7 uR/hr. Process building and grounds were 6 – 8 uR/hr. The highest dose rate identified was on the transfer pump between settling  $\frac{1}{2}$  round #1 and #2 which was 45 uR/hr on contact & 7 uR/hr @ 30 cm. Most, but not all, process building workers were wearing TLD's.
- Tracking documentation was reviewed with Petta staff. A sample spreadsheet was provided to Josh as the type of documentation the division desires to be captured by Petta.

**Actions Items:**

- Continue efforts to prevent waste accumulations on the floor of the building, outside of primary containment.
- Document results of all inspections to include the leak detection ports for the solidification pits, exterior secondary containment integrity, and exterior primary containment boxes. Documentation should include person performing inspection, date, inspection performed, results, actions recommended and taken.
- Update for review and approval, the radiation safety plan in accordance with guidance provided by Charles McCracken during the site visit.
- Implement approved radiation safety plan.
- Maintain tracking records for incoming and outgoing wastes. Include TENORM concentration analytical results and incoming box survey results.

**Photos on file @ M:\Engineering\Projects\Facilities\Guernsey County\PETTA Enterprises\Photos**