Inspection Report Chief's Order No. 2015-29 Division of Oil and Gas Resources Management (DOGRM)

Date: 01/16/2019

Site Name: PETTA Cambridge Facility

Location: 713 North Third St., Cambridge, Guernsey County

Owner: PETTA Enterprises, LLC Ohio

Contacts: Emergency – Brian Petta

Site – Bob Applegate, 740-584-6603

Weather: Approximately 30°F, cloudy

Arrival/Departure: 11:00 AM / 11:45 AM

In attendance: PETTA –Bob Applegate, Anthony Stevens, & Dan Flynn

DOGRM – Tara Lee & Martha D'Anna

Purpose: 1st Quarter Site Inspection 2020

Inspection/Observations:

- Per the 8/22/2019 inspection report action items, PETTA provided DOGRM Unconditional Release documentation on 9/20/2019, the ex-ray findings of the mix pit, an updated site plan on 10/24/2019, and record drawings and process flow for the industrial waste processing on 11/4/2019.
- Regarding the industrial waste processing, Mr. Applegate stated that a separate track hoe
 had been purchased. A sign was located above the northernmost bay indicating the
 industrial waste segregation. No construction had started on the outside tank storage for
 industrial waste processing. A frac tank was located within the industrial waste processing
 side, and no hoses or piping were noted going over to the interior oil and gas tank storage
 area.
- A fire involving waste and hot lime had occurred at the facility on 12/21/2019. Damage had occurred to the building and a track hoe. DOGRM discussed the damage that had occurred and operational changes to prevent future incidents.
- The two oil and gas waste mixing pits had approximately 12" of freeboard and were filled with flowable sludge. The track hoe was not operating during the visit. A frac tank was stored to the east of the pits and was used to store overflow of waste. The centrifuge had not been operational for around a month and had recently been repaired.
- The exterior tank farm had minimal accumulated stormwater within the secondary containment in the southeastern corner.

- Numerous roll offs and vac boxes were located to the west and south west of the facility and were reportedly empty.
- The roll off and vac box concrete containment located to the south of the facility building had minimal stormwater accumulated in it. Some of the roll offs were tarped and reportedly contained solid waste. The high radioactive waste container noted during the previous site visit had been hauled off for disposal.
- Several employees were working. All personnel were wearing hard hats, but protective
 clothing was limited. Waste substances were noted on the employee's clothing, skin, and
 hard hats.

Actions Items:

- Provide DOGRM a copy of the manifest for the disposal of the high radioactive waste noted above. Per report response dated 1/23/2020, Applegate stated waste still on site
- Please provide Mr. Petta's contact phone number.
- Provide operating procedures, changes in procedures, and/or other actions to be taken to prevent potential ignition of the lime and waste in the future.
- Continue efforts to prevent waste accumulations on the floor of the building, outside of primary containment.
- Repair the steel aprons of the primary containment pits. Provide a means to prevent wastes and liquids from being washed into the secondary containment pits.
- Continue to repair concrete berms and approaches into the building and onto secondary containment. Inspect all concrete on a regular basis and seal cracks as noted.
- Continue to follow the inspection procedure for the leak detection ports that includes routine "sticking" to determine if liquids are present in the secondary containment, extraction of any liquids from the secondary containment pits, documentation of the routine inspections and when liquids are extracted. Within two weeks of receipt of this report, provide DOGRM written documentation for two weeks of inspections that include the person performing the inspection, date, results, actions recommended and/or taken.
- Maintain tracking records for incoming and outgoing wastes. Include TENORM concentration analytical results and incoming box survey results.

Photographs: (additional photos on file)



Industrial processing area curtain



Building damage from fire



Pit #1