



STATE OF MISSISSIPPI  
PHIL BRYANT  
GOVERNOR  
MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY  
TRUDY D. FISHER, EXECUTIVE DIRECTOR

September 26, 2013

CERTIFIED MAIL/RETURN RECEIPT REQUESTED

Mrs. Julie Lewis  
Cameron Rig Solutions  
4601 Westway Park Blvd  
Houston, TX 77041

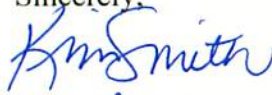
**Re: Cameron Rig Solutions  
Agreed Order No. 6328 13**

Dear Mrs. Lewis:

Enclosed you will find a copy of Agreed Order No. 6328 13, which has been executed by the Executive Director of the Mississippi Department of Environmental Quality, Trudy Fisher, on behalf of the Mississippi Commission on Environmental Quality.

The enclosed Order assesses a civil penalty. The penalty payment, when due, should be made by check payable to the Mississippi Department of Environmental Quality and returned in the enclosed, self-addressed envelope to the MDEQ Fees Division at P.O. Box 2339, Jackson, MS 39225.

If you have any questions regarding your obligations under the enclosed order, please contact Mohammad Yassin at (601) 961-5195.

Sincerely,  
  
for

Chris Sanders, P.E.  
Chief, Environmental Compliance and Enforcement Division

Enclosure  
cc: Mohammad Yassin

Agency Interest No. 1679  
ENF20130003

BEFORE THE MISSISSIPPI COMMISSION  
ON ENVIRONMENTAL QUALITY

MISSISSIPPI COMMISSION ON  
ENVIRONMENTAL QUALITY

COMPLAINANT

VS.

ORDER NO. 6328 13

CAMERON RIG SOLUTIONS  
500 LETOURNEAU ROAD  
VICKSBURG, MISSISSIPPI 39180

RESPONDENT

AGREED ORDER

COME NOW the Mississippi Commission on Environmental Quality (Commission), acting through the staff and Executive Director of the Mississippi Department of Environmental Quality (MDEQ), Complainant, and Cameron Rig Solutions, Respondent, in the above captioned cause and agree as follows:

1.

By letter dated July 9, 2013, Respondent was contacted by Complainant and notified of the following violation(s) at Cameron Rig Solutions, 500 LeTourneau Road, Vicksburg, Warren County, Mississippi:

A. Title V Operating Permit No. 2780-00087 - Section 1. General Conditions 1.24 (c) (i)

*Except as otherwise specified herein, the permittee shall be subject to the following provisions with respect to upsets, startups, shutdowns and maintenance.*

*(c) Maintenance.*

*(i) Maintenance should be performed during planned shutdown or repair of process equipment such that excess emissions are avoided. Unavoidable maintenance that results in brief periods of excess emissions and that is necessary to prevent or minimize emergency conditions or equipment malfunctions constitutes an affirmative defense to an enforcement action brought for*

*noncompliance with emission standards, or other regulatory requirements if the permittee can demonstrate the following:*

At the time of an inspection conducted on June 14, 2013, the curtain used to capture fugitive emissions was damaged and should have been replaced.

#### B. NPDES permit MS0052183 - Condition R-1, Recording of Results

*For each measurement or sample taken pursuant to the requirements of this permit, the permittee shall maintain records of all information obtained from such monitoring including:*

- (1) The exact place, date, and time of sampling;*
- (2) The dates the analyses were performed;*
- (3) The person(s) who performed the analyses;*
- (4) The analytical techniques, procedures or methods used; and*
- (5) The results of all required analyses. [WPC-1 Chapter One Section IV.A(29)a]*

For March through July of 2012, no wastewater monitoring results were recorded.

#### C. NPDES permit MS0052183 - Condition S-1 Reporting

*Monitoring results obtained during the previous reporting period shall be summarized and reported on a Discharge Monitoring Report Form (EPA No. 3320-1) POSTMARKED NO LATER THAN THE 28TH DAY OF THE MONTH FOLLOWING THE COMPLETED REPORTING PERIOD. Copies of these, and all other reports required herein, shall be signed in accordance with Chapter One Sections II.C. and II.E. of the Mississippi Wastewater Permit Regulations, and shall be submitted to the Mississippi Environmental Quality Permit Board at the following address:*

*Mississippi Department of Environmental Quality  
Office of Pollution Control  
P.O. Box 2261  
Jackson, Mississippi 39225. [WPC-1 Chapter One Section IV.A(15)c(1)]*

For Outfall 001A, Discharge Monitoring Report (DMRs) for February, March, and April of 2013 were submitted late. The DMRs were due by the 28<sup>st</sup> of the following month. These reports were submitted on June 19, 2013. For Outfalls 001B and 001C, quarterly DMRs for the first quarter of 2013 were due April 28, 2013, and submitted on June 19, 2013.

#### D. NPDES permit MS0022802 - Condition R-1 Reporting

For each measurement or sample taken pursuant to the requirements of this permit, the permittee shall maintain records of all information obtained from such monitoring including:

- (1) The exact place, date, and time of sampling;
- (2) The dates the analyses were performed;
- (3) The person(s) who performed the analyses;
- (4) The analytical techniques, procedures or methods used; and
- (5) The results of all required analyses. [WPC-1 Chapter One Section IV.A(29)a]

Monitoring results for first quarter of 2013 DMRs for Outfall 001 were not maintained.

E. 40 CFR § 262.34(a)(1) Management of Containers and by reference 40 CFR § 265.173(b)

*(a) Except as provided in paragraphs (d), (e), and (f) of this section, a generator may accumulate hazardous waste on-site for 90 days or less without a permit or without having interim status, provided that:*

40 CFR § 265.173(b) Management of containers

*A container holding hazardous waste must always be closed during storage, except when it is necessary to add or remove waste.*

Four drums stored in the two satellite accumulation areas were open and no waste was being added or removed.

By letter dated August 16, 2013, Respondent alleged to have implemented corrective action measures that have resulted in a return to compliance with the applicable permits and regulations.

2.

In lieu of a formal enforcement hearing concerning the violation(s) listed above, Complainant and Respondent agree to settle this matter as follows:

- A. Respondent agrees to pay and Complainant agrees to accept a civil penalty in the amount of \$9,800. Respondent shall pay this penalty to MDEQ within forty-five (45) days after this Agreed Order has been executed by the MDEQ Executive Director. The settlement payment shall be submitted to:

Mississippi Department of Environmental Quality  
Attn: Mona Varner  
P.O. Box 2339  
Jackson, MS 39225

3.

Nothing in this Agreed Order shall limit the rights of MDEQ or the Commission in the event Respondent fails to comply with this Agreed Order. The Agreed Order shall be strictly construed to apply to those matters expressly resolved herein.

4.


Nothing contained in this Agreed Order shall limit the rights of MDEQ or the Commission to take enforcement or other actions against Respondent for violations not addressed herein and for future violations of environmental laws, rules, and regulations.

5.

Respondent understands and acknowledges that it is entitled to an evidentiary hearing before the Commission pursuant to Miss. Code Ann. § 49-17-31, and that it has made an informed waiver of that right.

ORDERED, this the 26 day of September, 2013.

MISSISSIPPI COMMISSION ON  
ENVIRONMENTAL QUALITY

BY:   
TRUDY D. FISHER  
EXECUTIVE DIRECTOR  
MISSISSIPPI DEPARTMENT  
OF ENVIRONMENTAL QUALITY

AGREED, this the 17<sup>th</sup> day of September, 2013.

CAMERON RIG SOLUTIONS

BY: [Signature]

TITLE: PLANT MANAGER

STATE OF Mississippi

COUNTY OF Warren

PERSONALLY appeared before me, the undersigned authority in and for the jurisdiction aforesaid, the within named Dennis DeKerlegand who first being duly sworn, did state upon his/her oath and acknowledge to me that he/she is the Plant Manager of Cameron Rig Solutions and is authorized to sign and enter this Agreement.

SWORN AND SUBSCRIBED BEFORE ME, this the 17<sup>th</sup> day of September, 2013.

[Signature]  
NOTARY PUBLIC

My Commission expires: June 19, 2015

