

OKLAHOMA DEPARTMENT OF MINES  
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## PERFORMANCE STANDARDS

Blaster #

PAGE 1 OF 4

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Page 2 of 4

## INSPECTION REPORT NARRATIVE

Inspection Date: 3/24/25-4/3/25

Report Date: 4/3/25

Company: Miller Products, LLC (Gem Dirt)

Permit Number: LE-1554

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Oklahoma Department of Mines (ODM) Investigation Report on the fire at Miller Products, LLC, aka Gem Dirt (LE-1554)

Miller Products, LLC (Gem Dirt) owns and operates a mining permit in Tulsa County. Miller Products allows the public to dump their fallen leaves on site. Miller Products mines dirt and mixes it with the leaves to create a compost material which they sell to the public. Miller Products has acreage in this area that is on the mining permit and also has acreage that is not on the mining permit. ODM has jurisdiction on acreage contained in the mining permit regarding worker health and safety and permit compliance, but does not have jurisdiction on acreage outside the boundary of the mining permit.

The permittee first noticed the compost pile smoldering on 3/17/25 and they made attempts to extinguish the fire. Fire conditions were extreme statewide during this time. The permittee realized the smoldering compost pile was more than they could handle, so they called the Jenks Fire Department (JFD). JFD attempted to extinguish the fire using around 250,000 gallons of water with little success. JFD advised the permittee to let the compost pile burn itself out. At this time, conditions were such that JFD feared stirring up the compost pile could possibly get embers airborne and start additional fires. Over the next few days, the compost pile continued to smolder causing heavy smoke in the area. While nobody knows for sure, it was assumed by the permittee that a load of leaves someone brought to the site contained a lit cigarette that started the fire.

ODM began receiving emails on Sunday 3/23/25 about the smoldering fire at Gem Dirt. ODM Inspector Matt Moss visited the site on Monday 3/24/25 to investigate the situation. Inspector Moss observed stockpiles of composted materials that were smoldering. The permittee informed Inspector Moss that the piles had been smoldering for several days. The permittee informed Inspector Moss they were told by JFD to let the pile burn itself out. The compost pile was contained within the Gem Dirt property and was surrounded on all sides by open ground that contained no fuel to allow the fire to spread beyond the compost pile. It had been determined that everything burning was organic and there were no toxic materials on fire. Oklahoma Department of Environmental Quality (ODEQ) had been on-site and did not feel constant air quality monitoring was necessary due to the materials being organic.

ODM Chief of Minerals Operations spoke with Tulsa County District 2 Commissioner Lonnie Sims on 3/24/25. An on-site meeting was set up for the following day. Chief Shore contacted JFD Assistant Chief Kyle Zickefoose and informed him of the on-site meeting.

On Tuesday 3/25/25, Chief Shore and Inspector Moss arrived on-site. The compost piles were still smoldering with light smoke coming from the compost piles, but no open flames were observed. We met with officials from several agencies including the Oklahoma Department of Emergency Management, Tulsa Area Emergency Management, and the Jenks Fire Department. JFD Chief Greg Ostrum stated assets from the US Forest Service were in route to assist with putting the fire out as a result of a disaster declaration by the Jenks City Council. US Forest Service personnel and equipment began arriving a short time later.

*M. Shore*

## INSPECTION REPORT NARRATIVE - CONTINUED

Inspection Date: 3/24/25-4/3/25

Report Date: 4/3/25

Company: Miller Products, LLC (Gem Dirt)

Permit Number: LE-1554

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The plan was to utilize US Forest Service bulldozers to spread the compost piles out while firefighting personnel sprayed water on the smoldering material. The firefighting officials knew stirring the compost piles up would increase smoke and dust but felt based on the light wind speed and wind direction, this could be done safely and was the best option to get the fire out. Fire crews began this process and continued throughout the day. Additional fire departments from Glenpool and Sapulpa also assisted those already on-site to deliver water to the compost piles. Additional fire crews were available if any secondary fires ignited in the area.

Inspector Moss returned to the site on Wednesday 3/26/25. The fire crews were still spreading the compost material and applying water. Inspector Moss estimated crews had turned over and soaked approximately a quarter to a third of the total smoldering material. The fire crews were now using the extended boom on the fire engines to spray water from above the smoldering pile and get more water in the middle of the pile.

These efforts continued over the next few days and on Friday 3/28/25, JFD declared the fire out. JFD has required the permittee to keep continuous water sprinklers on the compost piles.

Based on ODM's investigation into this situation, we will be issuing two violations to the permittee.

### Violation #1

Title 45, Section 910 (B)(2) -- Signs warning against smoking and open flames shall be posted so they can readily be seen in areas or places where fire or explosion hazards exist.

There were large stockpiles of combustible material (compost) located on the permit and there was no signage posted to warn persons against smoking and open flames. "No Smoking or Open Flame" signage must be posted in areas where a fire hazard exists. In order to abate this violation, the permittee must post conspicuous "No Smoking or Open Flame" signs from all approaches around the compost piles.

### Violation #2

Title 45, Section 910 (B)(7) -- Combustible materials, grease, lubricants or flammable liquids shall not be allowed to accumulate where they can create a fire hazard.

Large piles of combustible material were allowed to accumulate on the permit. These piles consisted of compost (leaves mixed with dirt). The compost piles ignited and a large smoldering fire was created that took a large amount of manpower and equipment to extinguish. ODM has the authority to stop the permittee from accumulating the compost piles on permitted acreage. However, as stated earlier, not all of the Gem Dirt property where the fire occurred is under the jurisdiction of ODM's mining permit. Removing the compost piles off of acreage on the mining permit and onto acreage outside of the mining permit removes the problem from ODM's jurisdiction, but it does not eliminate the issue. ODM will work with the permittee and the City of Jenks/Jenks Fire Department to implement procedures to help prevent a similar occurrence in the future. JFD will enforce Section 2808 of the International Fire Code which governs storage requirements of compost materials. ODM will assist JFD in ensuring the permittee follows these storage requirements in the future. ODM may also require the use of water sprinklers on the compost piles during times of elevated fire conditions.

*u. Hughes*



## INSPECTION REPORT NARRATIVE

Inspection Date: 3-24,25,26,27,28-25

Report Date: 4-2-25

Company: Miller Products LLC, (Gem Dirt)

Permit Number: L.E. 1554-A

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These inspections were conducted in response to a fire on the Miller Products (Gem Dirt) permit. The fire was located on the leaf pile on the west side of the permit area. The fire first started on the afternoon of 3-17-24. Fire fighting teams were on site and it was learned that they would keep the fire contained to the leaf pile on site and allow it to slow burn and smolder. This strategy did keep the fire contained and the leaf pile continued to be reduced in size, but it was not known how long the pile would smolder.

For the next week, prevailing winds brought a lot of smoke into the neighborhood to the south of the permit. This understandably brought concerns for air quality by the people in the area. Complaints were received by numerous agencies including Oklahoma Department of Mines (ODM). The main concern as reported by news agencies was for the health of the people exposed to smoke; especially for those with compromised breathing issues.

ODM first visited the site on Monday 3-24-25. Fire fighters were continuing the strategy of allowing the slow burn of the leaves. Winds were light and blowing from the southwest keeping the smoke away from the neighborhood to the south. Photographs and GPS points were taken. In the past, Miller Products had been stockpiling leaves on an area adjacent to the permitted area to the west. However, due to regulations from DEQ they were not allowed to stockpile leaves below the level of the local flood plain. A long process of building a "pad" for the leaves on the west side began. The goal was to raise the ground level for the leaves out of the flood plain. In the meantime, the leaves brought in for their product were being piled up further east. The resulting pile consists of about 1.8 acres and was located on the permit area that ODM regulates.

On Tuesday 3-25-25, Travis Shore of ODM and I visited the site. Due to concerns of how long the fire might smolder (weeks or even longer), firefighting professional from many departments and agencies decided to aggressively fight the fire with water tankers and bulldozers. This process would invariably cause an increase in smoke output but it was believed that the situation could be resolved in a few days. The slow smolder that had been occurring for over a week now had reduced the volume of leaves making this new strategy more achievable. Photographs and videos were taken. Winds were favorable and no smoke odor was detected in the neighborhood to the south.

On Wednesday 3-26-25, the firefighting team was observed and they had developed an efficient relay system with tankers being filled from a water hydrant in the neighborhood and returning to the site. A large, high, far reaching boom had been set up to douse the now smoldering pile from above. The saturated leaves were still being pulled from the pile and were forming their own non-smoldering piles. Winds were blowing from the south and no smoke odor was detected in the neighborhood.

On Thursday 3-27-25, The firefighting team continued with their system of relaying the tankers from the hydrant to the site and using the booms to saturate the leaf pile. Winds were light and variable and no smoke odor was detected from the neighborhood. Photographs and videos were taken.

On Friday 3-28-25, the Jenks fire department reports that the fire is "out" with only a few small hot spots from within the largely saturated leaf pile. Upon inspection, this information was confirmed. The firefighting team was gone, and Gem Dirt workers were on duty to monitor the leaf pile. These workers were also in the process of installing a large sprinkler system. They had obtained a pump to pull water from the adjacent Polecat Creek. This water is intended to flow through the hoses that will wind through the leaf pile and numerous sprinkler heads to keep the pile saturated. The pile is now much smaller and flatter and the water should easily soak to the bottom of the pile.

This concludes with the daily inspections of this site as it relates to the fire. Follow-up inspections will occur as needed.

*Matthew M. Man*