

INSPECTION REPORT

Inspection Entry Date/Time	04/16/2024 08:35 (CT)			Announced: No
Inspection Exit Date/Time	04/16/2024 12:19 (CT)			Access: Granted
Regulatory Program	RCRA			
Type of Inspection	Focused Compliance Inspection (FCI)			
Facility or Site Name	Environmental Response Services, Inc. (ERS)			
Facility/Site Identifier	LAR000026534			
Facility/Site Physical Address	8583 Joe Ledoux Rd			
City, State, Zip Code	Lake Charles, LA 70605			
County/Borough	Calcasieu Parish			
Generator Status	Very Small Quantity Generator (VSQG)			
NAICS	None			
Type of Operation	ERS is a VSQG and transporter of hazardous waste and a generator, transfer facility, and transporter of used oil. The facility has an on-site oil-water separator and sells most of their used oil for a profit. They also receive non-hazardous waste, universal waste, medical waste, and APHIS regulated garbage.			
Geographic Coordinates	30.09548, -93.27908			
Additional Persons Participating in Inspection:				
Name	Title	Organization	Email	Phone
Elizabeth Pham	Inspector	EPA REGION 6	Pham.elizabeth@epa.gov	(214) 665-8354
Sandesh Thapa	Inspector	EPA REGION 6	Thapa.sandesh@epa.gov	(214) 665-2265
Anshul Paripati	Contractor	Eastern Research Group (ERG)	Anshul.Paripati@erg.com	(571) 535-1503
Lead Inspector:				
Cameron Tanaka	 Cameron Tanaka Digitally signed by Cameron Tanaka Date: 2024.07.25 16:07:30 -04'00'			07/25/2024
	ERG		Cameron.Tanaka@erg.com	(703) 633-1632 ext. 11632

SECTION I – INTRODUCTION**Site Entry and Purpose of the Inspection**

Type of inspection: Focused Compliance Inspection (FCI)

The Port of Lake Charles and surrounding facilities were selected for inspection based on an Environmental Justice and Regional initiative to evaluate facilities at ports receiving or transporting Resource Conservation and Recovery Act (RCRA)-regulated hazardous wastes, and/or have an International Convention for the Prevention of Pollution from Ships (MARPOL) Annex V Certificate of Adequacy (COA) issued by the U.S. Coast Guard (USCG).

This report is based on information supplied by the facility representatives, inspector observations, port related facilities, and records including photographs taken (see Appendix 1), verbal or written statements made during or after the on-site inspection, and/or materials shown, demonstrated, or submitted to the EPA during or after the on-site inspection. In addition, information gathered prior to or after the inspection from a review of EPA, State, and public records may be included in this report.

Attendees

Title/Organization	Name	Phone	Email	Opening Conf.	Closing Conf.
Lead Inspector/ Contractor/ERG	Cameron Tanaka	(703) 633-1632 ext. 11632	Cameron.Tanaka@erg.com	Yes	No
RCRA Inspector/ Contractor/ERG	Anshul Paripati	(571) 535-1503	Anshul.Paripati@erg.com	Yes	Yes
Inspector/Enforcement Officer/EPA Region 6	Elizabeth Pham	(214) 665-8354	Pham.elizabeth@epa.gov	Yes	Yes
Inspector/Enforcement Officer/EPA Region 6	Sandesh Thapa	(214) 665-2265	Thapa.sandesh@epa.gov	Yes	Yes

Facility General Description

Tenant/Area	Inspection Date	Process Description	Area of Concern
Environmental Response Services, Inc. (ERS)	04/16/24	Environmental Response Services, Inc. (ERS) is a VSQG and transporter of hazardous waste. ERS is a generator, transfer facility, and transporter of used/waste oil. The facility has an on-site oil-water separator and sells most of their used oil for a profit. They also receive non-hazardous waste and universal waste, such as batteries, e-waste, oily sludge, fluorescent lamps, and printer cartridges. They receive APHIS regulated garbage, including incinerator ash, that is sterilized at another unrelated facility. They also accept medical waste. They generate hazardous waste on site in the form of residual liquids from punctured aerosol can. They do not have a MARPOL COA.	Yes

SECTION II – OBSERVATIONS

Tenant: Environmental Response Services, Inc. (ERS)			
Section: 2.1	Date: 04/16/24, 8:35 AM	Contains AOC: Yes	Contains CBI: No
Lead Inspector: Cameron Tanaka	Attendees: Neil Clark (President) and Forress Clark (Secretary/Treasurer)		
ERS is a VSQG and transporter of hazardous waste. ERS is also a generator, transfer facility, and transporter of used oil. They have two vacuum trucks that are used for transportation of liquid wastes. ERS only services facilities, vessels, or docks by road. They are registered under the EPA ID LAR000026534 as a VSQG. They are currently undergoing LDEQ enforcement for leaking drums and tanks and other issues (see Appendix 2). They receive waste and used oil from land and marine facilities. Besides used oil, they also transfer and transport sump clean out materials, oil water filters, maintenance sludge, and oily waste filters and tank bottoms. The facility has an on-site oil-water separator process and sells most of the used oil they receive or generate on site for a profit. This process separates their oily slop into oil, water, and sludge. The slops are held in a 20,000-gallon slop tank before going into the separator process. ERS typically sells their used oil to H&H Chemical Company in Lake Charles. Every 1-2 years they remove the sludge from the separator process and transport it off site as non-hazardous waste to Republic in Winnie, Texas for deep well injection. They occasionally run TCLP tests for these sludges. Partial loads of sludge and oily water are also sent to US Ecology where US Ecology will perform testing. They have never seen this sludge or separator process waste come back as hazardous. Generally, they subcontract trucking companies for disposal of these wastes. They also receive non-hazardous waste, such as APHIS regulated incinerator ash and garbage, e-waste, oily sludge, and printer cartridges. ERS receives universal waste including used batteries and fluorescent lamps. Universal wastes are generally sent to LEI or Veolia. Mr. Clark indicated that they send off universal wastes approximately every 6 months. Mr. Clark explained that incinerator ash is held in chemical waste roll-off boxes that also include RCRA-empty containers, containers of paint chips, and rust scale. He indicated that these wastes are sent to a chemical waste management landfill. The incinerator ash, paint chips, and rust scale material are sampled about once a year. Their APHIS regulated garbage is sterilized at an unrelated facility. ERS also accepts medical waste. They generally try to reject any waste that they are not equipped to handle, such as hazardous waste. For APHIS regulated garbage, which are received on site in supersacks, their employees have a general understanding of materials that should not be included in the supersacks, such as cans or other potentially hazardous wastes. When ERS employees can feel these materials in the supersacks they will reject the waste, though sometimes 5-gallon buckets or other small items are found in the supersacks. For these incidents, they manage the wastes on a case-by-case basis. ERS also scraps old empty metal drums and sends empty plastic drums to landfills. They generate hazardous waste on site in the form of residual material from aerosol cans and waste paint. They keep drums on site for accumulating hazardous waste paint waste and residual materials from aerosol cans. These drums have been sent to Chemical Waste Management or Cicon as they are filled in the past. When they receive waste paint, they review the SDS of the waste paint to determine if they can accept the waste. They do not perform any further analysis on waste paint received at the time of reception. They comingle all waste paints in their hazardous paint waste drum. They do not perform transfers of hazardous waste as these wastes are generated on-site by being comingled in the drum. Mr. Clark indicated that they ship off their hazardous waste approximately every 4 months, soon after it is filled up, via vacuum trucks or trucks. ERS does not maintain a MARPOL COA. The inspection team viewed a hazardous waste manifest for non-hazardous oily water sludge and used oil			

forms for reception and sale. ERS did not hold the used oil on-site for more than 35 days according to the reviewed forms. The inspection team requested copies of their most recent universal waste manifest and hazardous waste paint and residual material from aerosol cans manifest in a follow-up email from April 18 (see Appendix 3). The universal waste and hazardous waste paint and residual material from aerosol cans manifests are included as Appendix 4 and Appendix 5, respectively. There were no issues noted for these manifests. Mr. Clark also included a waste profile from Tradebe Environmental Services, LLC for their paint and aerosol liquid waste in the follow-up email (see Appendix 6). There were no issues noted for this profile. Mr. Clark also included two manifests showing collection of used oil from a land-based facility and one manifest of used oil from a vessel (see Appendix 7 and Appendix 8, respectively). There were no issues noted for these manifests. Mr. Clark indicated that they have a Spill Response Plan and that drills for spills are performed every quarter. Documentation of their most recent spill response, which was requested in the follow-up email, is included as Appendix 9.

After the opening meeting, the inspection team performed a walk through around ERS' yard. They only operate on one acre of space with waste material scattered throughout the plot. Throughout the yard, the inspection team noted over 15 containers with used oil that did not have secondary containment (see Appendix 1 – Photo 1 and 2). [**AOC #1** – *ERS held containers used to store used oil at their transfer facility that were not equipped with a secondary containment system - 40 CFR 279.45(d)*] Mr. Clark indicated that the containers from Photo 1 were full and waiting to be sold.

Hazardous Waste Pad

In the ERS Hazardous Waste Pad area, the inspection team noted that the hazardous waste paint accumulation drum was labeled "paint" and not closed or dated (see Appendix 1 – Photo 3 and 4). In a follow up email from April 25 (see Appendix 10), Mr. Clark explained that this drum, "when inspected, did not have the lid securely closed or label on it. This drum contains paint and paint related waste from non-aerosol can generation. This is paint and thinner from emptying paint cans and jugs of paint thinner." Mr. Clark responded to this observation in his follow-up email on April 18 indicating that the drums had been closed, labeled, and dated by the end of the day on April 16 (see Appendix 3). Mr. Clark included a photograph of this waste paint drum in the follow-up email from April 25 (see Appendix 11). ERS also had waste aerosol cans that were not RCRA-empty that were not being treated as hazardous waste and they were not secured, labeled, or dated (see Appendix 1 – Photo 5). Mr. Clark responded to this observation in his follow-up email on April 18 indicating that these cans were put into a drum which was labeled and dated by the end of the day on April 16 (see Appendix 3). Similarly, a black 55-gallon drum containing unemptied aerosol cans was not treated as hazardous waste and it was not secured, labeled, or dated (see Appendix 1 – Photo 6). A red 55-gallon drum containing accumulated liquids from aerosol cans was not labeled (see Appendix 1 – Photo 6). Mr. Clark responded to this observation in his follow-up email on April 18 indicating that the drums had been labeled and dated by the end of the day on April 16 (see Appendix 3). Mr. Clark included a photograph of the aerosol waste management drums with a third drum for emptied aerosol cans in his follow-up email from April 25 (see Appendix 12). He explained in the email that these drums "are related to aerosol can management. From left to right, the left drum is where we put the unpunctured cans until we get a chance to puncture them. The center drum is a closed top drum with the aerosol can puncturing device and vapor filter installed. This center drum is where we puncture our aerosol cans and retain the liquids until ready for disposal. The third drum labeled non-regulated are the aerosol cans which have been punctured, drained, and empty" (see Appendix 10).

General Yard Area

The inspection team also viewed a tote labeled "operational wastes" containing used oil that did not have secondary containment (see Appendix 1 – Photo 7 and 8). [see **AOC #1**; **AOC #2** – *ERS did not clearly label*

containers used to store used oil with the words "Used Oil" - 40 CFR 279.22(c)(1)] A spill was observed to be coming from a drum that Mr. Clark indicated contained grease. **[AOC #3 – Upon detection of a release of used oil to the environment that is not subject the requirements of part 280, subpart F of this chapter and which has occurred after the effective date of the recycled used oil management program in effect in the State in which the release is located, ERS did not perform the following cleanup steps: Clean up and manage properly the released used oil and other materials. - 40 CFR 279.22(d)(3)]** The drum was picked up during the inspection (see Appendix 1 – Photo 25). Mr. Clark explained in his email from April 25 that the "Contaminated soil was removed and placed in the roll off box with the rest of the oily solids for later disposal at Chemical Waste Management this was completed before end of day 4-16" (see Appendix 10).

Oil-Water Separator Process Area

The inspection team observed a spill from ERS' used oil tank (see Appendix 1 – Photo 9 and 10). Mr. Clark explained that they have an impermeable liner buried under 2 feet of soil under this tank. The inspection team viewed used oil totes that did not have secondary containment directly outside of this lined area (see Appendix 1 – Photo 11). [see **AOC #1**] The facility's washout pad also had visible soil contamination surrounding it (see Appendix 1 – Photo 12). [see **AOC #3**]

General Waste Storage Area

The inspection team observed 40 5-gallon buckets and 14 55-gallon drums of potentially hazardous waste that had been on site for over a year according to Mr. Clark (see Appendix 1 – Photo 13). Waste determinations were not conducted on the contents of these containers. **[AOC #4 – ERS did not make an accurate determination as to whether their waste is a hazardous waste in order to ensure wastes are properly managed according to applicable RCRA regulations. – 40 CFR 262.11]**. Similarly, three white drums containing "soaps" according to Mr. Clark, which had been on site for about six years, and three blue drums of unknown material without waste determinations were observed (see Appendix 1 – Photo 14). [see **AOC #4**]

Universal Waste Storage Area (see Appendix 1 – Photo 15)

The inspection team observed many containers of e-waste in the universal waste storage area (see Appendix 1 – Photo 16). The team also observed a bucket and a drum of used batteries in this area with universal waste labels that were not dated (see Appendix 1 – Photo 17 and 18). **[AOC #5 – ERS did not provide a demonstration of the length of time that the universal waste has been accumulated from the date it becomes a waste or is received - 40 CFR 273.15(c)]**. ERS also had a box of expired flares that were handled as universal waste (see Appendix 1 – Photo 19 and 20). At the time of the inspection, ERS had not made a hazardous waste determination on these flares. **[AOC #6 – ERS must make an accurate determination as to whether the expired flares are a hazardous waste in order to ensure wastes are properly managed according to applicable RCRA regulations. – 40 CFR 262.11]** This area contained two pallets of used batteries that had not been labelled or dated (see Appendix 1 – Photo 21). **[AOC #7 – ERS did not label or mark clearly their used batteries with any one of the following phrases: "Universal Waste-Battery(ies)," or "Waste Battery(ies)," or "Used Battery(ies)." - 40 CFR 273.14(a); see AOC #5]** In his follow-up email from April 18, Mr. Clark indicated that "Two pallets of Lead Acid batteries were labeled shortly after inspection and by end of day (April 16) shipped off for scrap" (see Appendix 3). The team also observed two piles of expired fluorescent lamps that were not labeled (see Appendix 1 – Photo 22). **[AOC #8 – ERS did not label or mark clearly each lamp or a container or package in which such lamps are contained with one of the following phrases: "Universal Waste- Lamp(s)," or "Waste Lamp(s)," or "Used Lamp(s)." - 40 CFR 273.14(e)]**. Several of the lamps were not secured in closed boxes or in structurally sound boxes **[AOC #9 – ERS did not store some of the universal waste lamps in containers or packages that are structurally sound and able to prevent breakage – 40 CFR 273.13(d)(1)]**. In his follow-up email from April 18, Mr. Clark indicated that these "Expired Lamps were labeled and dated 4-17"

(see Appendix 3). This area also contained 8 used oil drums without secondary containment or labels (see Appendix 1 – Photo 23 and 24). [see **AOC #1** and **AOC #2**]

The inspection team did not observe any other areas of concern at the time of the inspection. A closing conference was conducted at approximately 12:05 PM with ERS personnel. The initial AOCs were communicated during the closing.

SECTION III – RECORDS REVIEW

No RCRA regulated records reviewed during this focused onsite inspection.

SECTION IV – APPARENT AREAS OF CONCERN

The presentation of Area(s) of Concern does not constitute a formal compliance determination or violation.

Tenant: Environmental Response Services		
AOC #1 – ERS held containers used to store used oil at their transfer facility that were not equipped with a secondary containment system.	Citation: 40 CFR 279.45(d)	Section: 2.1
AOC #2 – ERS did not clearly label containers used to store used oil with the words "Used Oil."	Citation: 40 CFR 279.22(c)(1)	Section: 2.1
AOC #3 – Upon detection of a release of used oil to the environment that is not subject the requirements of part 280, subpart F of this chapter and which has occurred after the effective date of the recycled used oil management program in effect in the State in which the release is located, ERS did not perform the following cleanup steps: Clean up and manage properly the released used oil and other materials.	Citation: 40 CFR 279.22(d)(3)	Section: 2.1
AOC #4 – ERS did not make an accurate determination as to whether their waste is a hazardous waste in order to ensure wastes are properly managed according to applicable RCRA regulations.	Citation: 40 CFR 262.11	Section: 2.1
AOC #5 – ERS did not provide a demonstration of the length of time that the universal waste has been accumulated from the date it becomes a waste or is received.	Citation: 40 CFR 273.15(c)	Section: 2.1
AOC #6 – ERS must make an accurate determination as to whether the expired flares are a hazardous waste in order to ensure wastes are properly managed according to applicable RCRA regulations.	Citation: 40 CFR 262.11	Section: 2.1
AOC #7 – ERS did not label or mark clearly their used batteries with any one of the following phrases: "Universal Waste-Battery(ies)," or "Waste Battery(ies)," or "Used Battery(ies)."	Citation: 40 CFR 273.14(a)	Section: 2.1
AOC #8 – ERS did not label or mark clearly each lamp or a container or package in which such lamps are contained with one of the following phrases: "Universal Waste- Lamp(s)," or "Waste Lamp(s)," or "Used Lamp(s)."	Citation: 40 CFR 273.14(e)	Section: 2.1
AOC #9 – ERS did not store some of the universal	Citation: 40 CFR 273.13(d)(1)	Section: 2.1

waste lamps in containers or packages that are structurally sound and able to prevent breakage.		
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SECTION V – FOLLOW UP**Follow-Up**

Any facility follow-up items are as discussed in each facility's observations in Section II. Documents or files provided by the facilities were transmitted via email and included responses to areas of concern or provision of documents requested.

Communication Log

During and after the inspection, additional information was emailed to EPA including:

1. 04/18/24 ERS email – Neil Clark sent many descriptions of corrective actions implemented at the site and many documents requested during the inspection.
2. 04/25/24 ERS email – Neil Clark sent several photographs and descriptions of corrective actions implemented at the site.

SECTION VI – LIST OF APPENDICES

Appendix 1. Photograph Log

Appendix 2. LDEQ Inspection Report for ERS

Appendix 3. Follow-Up Email from ERS April 18

Appendix 4. ERS Universal Waste Manifest

Appendix 5. ERS Hazardous Waste Manifest Paint and Aerosol Liquid

Appendix 6. ERS Profile for Paint and Aerosol Liquid

Appendix 7. ERS Receipt of Used Oil from Land-based Facility

Appendix 8. ERS Most Recent Spill Response Report

Appendix 9. ERS Receipt of Used Oil from Vessel

Appendix 10. Follow-Up Email from ERS April 25

Appendix 11. Photo of Waste Paint Drum in Follow-Up Email from ERS April 25

Appendix 12. Photo of Aerosol Can Management Drums in Follow-Up Email from ERS April 25

APPENDIX 1.
PHOTOGRAPH LOG



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 1

Location: Environmental Response Services		
City: Lake Charles	County/Parish: Calcasieu	State: Louisiana



Photo File Name: DSCN7176

Date of Photo: 04/16/2024

Time of Photo: 09:28 hrs.

Photographer: Anshul Paripati

Description: View of two containers of used oil and one container of oily rags and filters in the ERS yard without secondary containment.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 2

Location: Environmental Response Services		
City: Lake Charles	County/Parish: Calcasieu	State: Louisiana



Photo File Name: DSCN7177

Date of Photo: 04/16/2024

Time of Photo: 09:30 hrs.

Photographer: Anshul Paripati

Description: View of four containers labelled used oil in the ERS yard without secondary containment.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 3

Location: Environmental Response Services		
City: Lake Charles	County/Parish: Calcasieu	State: Louisiana



Photo File Name: DSCN7178

Date of Photo: 04/16/2024

Time of Photo: 09:39 hrs.

Photographer: Anshul Paripati

Description: View of 55-gallon waste paint drum in the ERS Hazardous Waste Pad area, which was unsecured, labeled "paint," and not dated.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 4

Location: Environmental Response Services		
City: Lake Charles	County/Parish: Calcasieu	State: Louisiana



Photo File Name: DSCN70179

Date of Photo: 04/16/2024

Time of Photo: 09:42 hrs.

Photographer: Anshul Paripati

Description: View of label on 55-gallon waste paint drum in the ERS hazardous waste pad area, which was unsecured, labeled "paint," and not dated.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 5

Location: Environmental Response Services		
City: Lake Charles	County/Parish: Calcasieu	State: Louisiana



Photo File Name: DSCN7181

Date of Photo: 04/16/2024

Time of Photo: 09:45 hrs.

Photographer: Anshul Paripati

Description: Waste aerosol cans that were not RCRA-empty and not secured, labeled, or dated in the ERS Hazardous Waste Pad area.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 6

Location: Environmental Response Services		
City: Lake Charles	County/Parish: Calcasieu	State: Louisiana



Photo File Name: DSCN7182

Date of Photo: 04/16/2024

Time of Photo: 09:47 hrs.

Photographer: Anshul Paripati

Description: View of two unlabeled 55-gallon containers for aerosol waste management. The red drum on the left is for puncturing aerosol cans and accumulating their liquids. The black drum on the right is for storing unemptied aerosol cans before they are punctured.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 7

Location: Environmental Response Services		
City: Lake Charles	County/Parish: Calcasieu	State: Louisiana



Photo File Name: IMG_7689

Date of Photo: 04/16/2024

Time of Photo: 11:43 hrs.

Photographer: Anshul Paripati

Description: Overview of used oil tote labeled "operational wastes" without secondary containment in ERS' general yard area.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 8

Location: Environmental Response Services		
City: Lake Charles	County/Parish: Calcasieu	State: Louisiana



Photo File Name: IMG_7690

Date of Photo: 04/16/2024

Time of Photo: 11:43 hrs.

Photographer: Anshul Paripati

Description: View of used oil tote labeled "operational wastes" without secondary containment in ERS' general yard area.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 9

Location: Environmental Response Services

City: Lake Charles

County/Parish: Calcasieu

State: Louisiana



Photo File Name: IMG_7692

Date of Photo: 04/16/2024

Time of Photo: 11:48 hrs.

Photographer: Anshul Paripati

Description: View of a spill onto the soil on top of the liner, directly in front of the wooden plank in front of the black bucket, coming from a used oil tank in ERS' oil-water separator process area.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 10

Location: Environmental Response Services		
City: Lake Charles	County/Parish: Calcasieu	State: Louisiana



Photo File Name: IMG_7693

Date of Photo: 04/16/2024

Time of Photo: 11:49 hrs.

Photographer: Anshul Paripati

Description: Close-up of contaminated soil due to a spill coming from a used oil tank in ERS' oil-water separator process area.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 11

Location: Environmental Response Services

City: Lake Charles

County/Parish: Calcasieu

State: Louisiana



Photo File Name: IMG_7694

Date of Photo: 04/16/2024

Time of Photo: 11:50 hrs.

Photographer: Anshul Paripati

Description: View of three used oil totes that did not have secondary containment directly outside of the lined area of the oil-water separator process area.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 12

Location: Environmental Response Services		
City: Lake Charles	County/Parish: Calcasieu	State: Louisiana



Photo File Name: IMG_7695

Date of Photo: 04/16/2024

Time of Photo: 11:52 hrs.

Photographer: Anshul Paripati

Description: View of soil contamination surrounding ERS' washout pad in the oil-water separator process area.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 13

Location: Environmental Response Services		
City: Lake Charles	County/Parish: Calcasieu	State: Louisiana



Photo File Name: IMG_7696

Date of Photo: 04/16/2024

Time of Photo: 11:53 hrs.

Photographer: Anshul Paripati

Description: View of 40 buckets and 14 drums of potentially hazardous waste that had been on site for over a year according to Mr. Clark in ERS' general waste storage area.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 14

Location: Environmental Response Services		
City: Lake Charles	County/Parish: Calcasieu	State: Louisiana



Photo File Name: IMG_7697

Date of Photo: 04/16/2024

Time of Photo: 11:55 hrs.

Photographer: Anshul Paripati

Description: View of three white drums containing "soaps" according to Mr. Clark, which had been on site for about six years, and three blue drums of unknown material without waste determinations in ERS's general waste storage area.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 15

Location: Environmental Response Services		
City: Lake Charles	County/Parish: Calcasieu	State: Louisiana



Photo File Name: IMG_7698

Date of Photo: 04/16/2024

Time of Photo: 11:57 hrs.

Photographer: Anshul Paripati

Description: Overview of ERS' universal waste storage area



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 16

Location: Environmental Response Services		
City: Lake Charles	County/Parish: Calcasieu	State: Louisiana



Photo File Name: IMG_7699

Date of Photo: 04/16/2024

Time of Photo: 11:57 hrs.

Photographer: Anshul Paripati

Description: View of a container of e-waste in the universal waste storage area, observed.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 17

Location: Environmental Response Services

City: Lake Charles

County/Parish: Calcasieu

State: Louisiana



Photo File Name: IMG_7700

Date of Photo: 04/16/2024

Time of Photo: 12:00 hrs.

Photographer: Anshul Paripati

Description: Close-up view of used battery containers in the universal waste storage area with universal waste labels, observed.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 18

Location: Environmental Response Services		
City: Lake Charles	County/Parish: Calcasieu	State: Louisiana



Photo File Name: IMG_7701

Date of Photo: 04/16/2024

Time of Photo: 12:01 hrs.

Photographer: Anshul Paripati

Description: Overview of used battery containers in the universal waste storage area with universal waste labels, observed.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 19

Location: Environmental Response Services		
City: Lake Charles	County/Parish: Calcasieu	State: Louisiana



Photo File Name: IMG_7702

Date of Photo: 04/16/2024

Time of Photo: 12:02 hrs.

Photographer: Anshul Paripati

Description: View of expired flares handled as universal waste in ERS' universal waste storage area.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 20

Location: Environmental Response Services		
City: Lake Charles	County/Parish: Calcasieu	State: Louisiana



Photo File Name: IMG_7703

Date of Photo: 04/16/2024

Time of Photo: 12:03 hrs.

Photographer: Anshul Paripati

Description: Overview of expired flares handled as universal waste in ERS' universal waste storage area.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 21

Location: Environmental Response Services

City: Lake Charles

County/Parish: Calcasieu

State: Louisiana



Photo File Name: IMG_7704

Date of Photo: 04/16/2024

Time of Photo: 12:03 hrs.

Photographer: Anshul Paripati

Description: View of two pallets of used batteries that had not been labeled in ERS' universal waste storage area.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 22

Location: Environmental Response Services		
City: Lake Charles	County/Parish: Calcasieu	State: Louisiana



Photo File Name: IMG_7705

Date of Photo: 04/16/2024

Time of Photo: 12:04 hrs.

Photographer: Anshul Paripati

Description: View of a pile of expired fluorescent lamps that had not been labeled in ERS' universal waste storage area.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 23

Location: Environmental Response Services

City: Lake Charles

County/Parish: Calcasieu

State: Louisiana



Photo File Name: IMG_7706

Date of Photo: 04/16/2024

Time of Photo: 12:04 hrs.

Photographer: Anshul Paripati

Description View of 8 used oil drums without secondary containment or labels in ERS' universal waste storage area.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 24

Location: Environmental Response Services		
City: Lake Charles	County/Parish: Calcasieu	State: Louisiana



Photo File Name: IMG_7707

Date of Photo: 04/16/2024

Time of Photo: 12:05 hrs.

Photographer: Anshul Paripati

Description: Close-up of one of the used oil drums shown in Photo No. 38 with a faded label.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 25

Location: Environmental Response Services		
City: Lake Charles	County/Parish: Calcasieu	State: Louisiana



Photo File Name: IMG_7708

Date of Photo: 04/16/2024

Time of Photo: 12:06 hrs.

Photographer: Anshul Paripati

Description: View of contaminated soil from spill observed to be coming from a drum that Mr. Clark indicated contained grease in ERS' general yard area.

APPENDIX 2.
LDEQ INSPECTION REPORT FOR ERS

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY INTRA-AGENCY ROUTING FORM

TO: Enforcement Division

FROM: Surveillance Division

Routing Date: 2/6/2023

Facility Information

Company Name: Environmental Response Services, Inc.

Facility Site Name: Environmental Response Services, Inc.

Agency Interest No: 29918

Alt. AI No: LAR000026534

Mailing Address:

Physical Address:

Street: P.O. Box 4288

Street: 8583 Joe Ledoux Road

City, State, Zip: Lake Charles, LA 70606

City, Parish: Lake Charles, Calcasieu

Responsible Party/Contact Person: Neil Clark | Owner

Responsible Party/Contact Person Telephone No: 337-562-0001

Inspection/Referral Information

Inspection Date: 10/24/2022-10/27/2022

Hours Spent On Inspection/Report: 60.0

Media: Check all that apply

Air (inc. asbestos/lead): ☐

Water: ☐

Haz. Waste: ☒

Risk MPs: ☐

Remediation: ☐

Solid Waste (inc. tires): ☐

UST: ☐

Radiation: ☐

Stage 1 & 2: ☐

Complaint? ☐ Yes ☒ No

Follow up? ☐ Yes ☒ No *If yes*

Enforcement Action Number

Inspector/Team Leader Name: Agueda Elena Mayard *AEM*

Inspector/Team Leader Contact No.: 337-491-2667

Approved By: *Chime Julianos, ES Manager*

Date: *2/13/2023 ENF*

Approved By:

Date:

Circuit Rider Review:

Date

Basis for Routing (check all that apply)

Areas of Concern: ☒		Contamination Above RECAP: ☐	
☐ Conveyance Notice Only		TEMPO Task ID No:	INS20230002
Other: ☐	Please Explain:		

Additional Information: *This section should state the specific reason for the referral, actions that have been taken by the referring division and supporting documentation. This section should also provide sufficient discussion and/or documentation for the Division receiving the referral to take action including documentation of events leading to the referral and company contact information.*

See inspection narrative for details. The following violation were noted during the inspection:

The facility failed to label drums of hazardous waste with the words "hazardous waste," which is a violation of LAC 33:V.1009.A.7.

The facility failed to obtain a standard permit for the storage of hazardous waste, which is a violation of LAC 33:V.303.B.

The facility failed to determine if the wastes are hazardous waste in order to ensure the wastes are properly managed according to applicable RCRA regulations, which is a violation of LAC 33:V.1005.A.

The container of hazardous waste aerosols was not closed, which is a violation of LAC 33:V.1009.A.6.

The facility failed to have a secondary containment system for the containers used to store used oil in this area, which is a violation of LAC 33:V.4035.E.

The facility failed to store used oil in containers that are in good condition, which is a violation of LAC 33:V.4035.D.1.

The facility failed to store used oil in containers that are not leaking, which is a violation of LAC 33:V.4035.D.2.

The facility failed to comply with LAC 33:V.4035.I, by not performing the following cleanup steps: (1) stop the release; (2) contain the released used oil; (3) clean up and manage properly the released used oil and other materials; and (4) if necessary, repair or replace any leaking used oil storage containers or tanks prior to returning them to service.

The facility held shipments of used oil for more than 35 days, which is a violation of LAC 33:V.4035.B.

The facility failed to clearly label or mark containers and aboveground tanks used to store used oil at transfer facilities with the words "Used Oil," which is a violation of LAC 33:V.4035.H.1.

The facility failed to clearly label or mark universal waste batteries (e.g., each battery), or a container in which the batteries are contained, with any one of the following phrases: "Universal Waste—Battery(ies)," or "Waste Battery(ies)," or "Used Battery(ies)." This is a violation of LAC 33:V.3823.A.1.

Unauthorized disposal of a solid waste is a violation of LAC 33:VII.315.C.

The facility failed to have a secondary containment system for aboveground tanks used to store used oil in this area, which is a violation of LAC 33:V.4035.F.

The transporter (ERS) failed to notify the Office of Environmental Services (OES) and obtain written approval by the administrative authority prior to storing waste, which is a violation of LAC 33:V.1305.C.

The facility failed to notify OES within seven days if any information (i.e. waste codes) submitted in the HW-1 changes, which is a violation of LAC 33:V.1017.A.

Failure to comply with all applicable spill prevention, control, and countermeasures requirements is a violation of LAC 33:V.4035.A.

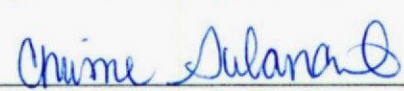
JOHN BEL EDWARDS
GOVERNOR



CHUCK CARR BROWN, PH.D.
SECRETARY

State of Louisiana
DEPARTMENT OF ENVIRONMENTAL QUALITY
OFFICE OF ENVIRONMENTAL COMPLIANCE

**Southwest Regional Office
Hazardous Waste Inspection Report**

Inspection Date: October 24, 2022 – October 27, 2022 Incident No.: N/A
AI No.: 29918 Alt. ID/Permit No: LAR000026534
Company Name: Environmental Response Services, Inc.
Physical Location: 8583 Joe Ledoux Road
Lake Charles LA Parish: Calcasieu
(City) (State)
Mailing Address: P.O. Box 4288 Lake Charles LA 70606
(Address) (City) (State) (Zip)
Facility Representative/Title: Neil Clark | Owner
Denny Harris | Employee
Facility Representative Telephone No.: 337-562-0001
LDEQ Lead Inspector: Agueda Elena Mayard
Other Inspectors: Laura Bruchhaus
Jason Roy
Report By:  2/6/2023
Agueda Elena Mayard, Environmental Scientist III (Date)
Reviewed By:  2/13/2023
Chrissie Gubancsik, Environmental Scientist Manager (Date)

AI No.: 29918
Alt. ID No.: LAR000026534

Facility Name: Environmental Response Services
Inspection Date: Oct. 24, 2022 – Oct. 27, 2022

INTRODUCTION

On October 24, 2022 and October 27, 2022, a full compliance evaluation inspection (CEI) was conducted at Environmental Response Services, Inc. (ERS) to determine compliance with the applicable Resource Conservation and Recovery Act (RCRA) requirements and Louisiana Hazardous Waste Regulations. The facility representative was Neil Clark, Owner, and Denny Harris, Yard Hand. The Louisiana Department of Environmental Quality (LDEQ) representatives were Agueda Elena Mayard, Laura Bruchhaus, and Jason Roy.

FACILITY DESCRIPTION

ERS operates an environmental, industrial, and marine cleanup company. ERS is a used oil transporter and transfer facility that collects, stores, and transports used oil from businesses in southwest Louisiana. Used oil is collected in a vacuum truck or in drums and transferred to the facility for storage until enough is accumulated for offsite recycling. The facility also collects used oil filters and used oil-contaminated solids for disposal. ERS is a hazardous waste transporter that collects hazardous waste from businesses and transports the waste to destination facilities. The facility occasionally generates their own waste from cleanup activities. See Attachment 6 for 2022 aerial imagery of the facility obtained from the Calcasieu Parish Tax Assessor webpage.

FACILITY HISTORY

ERS initially notified the Department, via Notification of Hazardous Waste Activity form (HW-1) as a very small quantity generator (VSQG) of hazardous waste, transporter of hazardous waste, and used oil transporter and transfer facility on December 12, 1997. The most recent update providing subsequent information was submitted on the HW-1 on October 27, 2000. The facility updated the installation owner and property owner. The facility generates hazardous wastes with the following waste codes: D001, D002, D018, F003, and F005. The facility is currently notified as VSQG, transporter of hazardous waste, and used oil transporter and transfer facility (Attachment 2).

This CEI is the facility's fourth RCRA based CEI. The previous inspection was conducted by Anthony Olivier on November 30, 2018. A review of the LDEQ's Electronic Document Management System (EDMS) revealed the facility has no record of non-compliance in the Hazardous Waste Media for the last five years.

One complaint notification concerning hazardous waste was received by the LDEQ for this facility on April 15, 2020, regarding an alleged unauthorized discharge. At the time of this complaint investigation, the material in question was water from a leaking tanker truck used for pressure washing. No incident notifications concerning hazardous waste were received by the LDEQ for this facility.

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Alt. ID No.: LAR000026534

Facility Name: Environmental Response Services
Inspection Date: Oct. 24, 2022 – Oct. 27, 2022

AREAS EVALUATED

The CEI included a tour of the facility, a review of the facility's recordkeeping requirements, and interviews with facility personnel that was provided by Mr. Harris and Mr. Clark.

Facility Tour

On October 24, 2022, Mr. Harris escorted Ms. Bruchhaus and me throughout the facility. Jason Roy and I returned on October 27, 2022, to complete the inspection with the business owner, Neil Clark. South of the main office on the west side, there were numerous drums of non-hazardous and hazardous waste drums (Attachment 3, Photographs 1-2). Mr. Harris stated the majority of the drums were picked up at other facilities and transported to ERS. He indicated that the drums to the right were non-hazardous waste, and the drums to the left were mostly hazardous waste. I observed a few 55-gallon drums with labels indicating they stored waste paint or aerosol liquids (Attachment 3, Photographs 4-7). These drums were in the area of hazardous waste drums indicated by the facility representative. Two drums had labels indicating they were "flammable." However, **the drums were not labeled with the words "hazardous waste," which is a violation of LAC 33:V.1009.A.7.** The drums showed signs of deterioration and rusting. I observed approximately six rusted drums of engine oil. Mr. Harris stated this was product. (Attachment 3, Photograph 3).

In this area, I observed two 55-gallon drums with hazardous waste labels that indicated the waste was generated by Noble Services – Stanley in Port Fourchon (Attachment 3, Photographs 8-12). The label indicated the drums contained propylene glycol, water, sodium hydroxide, and sulfamic acid. The drums were labeled with an additional tag that had "3/22." Mr. Harris explained that this tag indicates the date the drum was picked up from the generator facility for transportation. Mr. Harris stated that the drums were brought to ERS instead of the destination facility. According to LAC 33:V.1305.A, a transporter who stores manifested shipments of hazardous waste at a transfer facility for more than 10 days is considered a storage facility and is required to obtain a permit in compliance with the conditions of these regulations. **The facility failed to obtain a standard permit for the storage of hazardous waste, which is a violation of LAC 33:V.303.B.** I observed a green 55-gallon drum and a black 55-gallon drum that contained paint, according to the tags (Attachment 3, Photographs 13-16). The tags were also marked with a date "3/22," and indicated Breaux Petro generated the waste. During the file review, I reviewed a hazardous waste manifest for this material (Attachment 3, Photograph 76). The manifest indicates four drums of paint waste were picked up from Breaux Petroleum in Lockport in Lafourche Parish. The drums were not labeled as hazardous waste. A transporter shall not transport a shipment of hazardous waste in containers unless each hazardous waste container is marked and labeled as required in LAC 33:V.1063.B and C. If the label is lost or detached, the transporter shall replace it based on the information taken from the manifest for the shipment. **The facility failed to ensure the drums were labeled as required, which is a violation of LAC 33:V.1309.C. The drums were onsite for more than 10 days allowed for a transporter/transfer facility, which is a violation of LAC 33:V.303.B.** Mr. Clark stated some of the hazardous waste drums have been onsite for up to two years. He stated that he is unsure what some of the drums contain. Mr. Clark stated he would "take responsibility as the generator"

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Facility Name: Environmental Response Services
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and have them re-profiled and disposed appropriately. The deteriorated labels or lack of labels made it difficult to determine the contents of some of the waste drums, and whether they were hazardous or non-hazardous waste. **The facility failed to determine if the wastes are hazardous waste in order to ensure the wastes are properly managed according to applicable RCRA regulations, which is a violation of LAC 33:V.1005.A.**

On the central west side of the facility, I observed an open top drum of aerosol cans and a drum with a puncture device storing aerosol liquids (Attachment 3, Photographs 16-17). Mr. Harris stated this was hazardous waste that was generated by ERS. Both drums were full. **The drums were not labeled with the words "hazardous waste," which is a violation of LAC 33:V.1009.A.7. The container of aerosol cans was not closed, which is a violation of LAC 33:V.1009.A.6.**

Directly across on the east side of the facility, there were several drums of used oil, oily water, and some hazardous waste drums (Attachment 3, Photographs 19, 21-23, 30, 32-37, and 65-69). The drums, specifically used oil drums, were on earthen ground and did not have an adequate secondary containment system. **The facility failed to have a secondary containment system for the containers used to store used oil in this area, which is a violation of LAC 33:V.4035.E.** I observed rusting and deterioration of some of the drums in this area (Attachment 3, Photographs 20-24, and 36-37). I also observed some leaking containers and spills (Attachment 3, Photographs 25-28, 61, 63, and 64). **The facility failed to store used oil in containers that are in good condition and not leaking, which are violations of LAC 33:V.4035.D.1 and LAC 33:V.4035.D.2, respectively.** Photographs 61 and 63-64 show that the facility noted a spill and attempted to clean it by applying absorbent pads. The oil-contaminated pads were left after some time. **The facility failed to comply with LAC 33:V.4035.I, by not performing the following cleanup steps: (1) stop the release; (2) contain the released used oil; (3) clean up and manage properly the released used oil and other materials; and (4) if necessary, repair or replace any leaking used oil storage containers or tanks prior to returning them to service.** The facility stores crushed drums in a metal roll-off container. Beneath the container, I observed evidence of a spill from the residual fluids from the crushed drums (Attachment 3, Photograph 62).

A 55-gallon drum of used oil was tagged with a label that read "8/3/2022 Tremayne Picou Residential 55-gal Used Oil" (Attachment 3, Photographs 29-30). Another drum was observed with a tag dated "11/9/21" (Attachment 3, Photograph 31-32). Another drum of oily waste was dated "9/23/21" (Attachment 3, Photograph 20). Mr. Harris explained that the date indicates when the drum was picked up by ERS for transportation. The allowed storage time of used oil for transfer facilities is 35 days. **The facility held shipments of used oil for more than 35 days, which is a violation of LAC 33:V.4035.B.** Several used oil drums were observed without adequate labels. See Attachment 3, Photographs 19, 22-23, 25, and 33-35. **The facility failed to clearly label or mark containers used to store used oil at transfer facilities with the words "Used Oil," which is a violation of LAC 33:V.4035.H.1.**

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I observed a pallet of used batteries (Attachment 3, Photograph 38). Mr. Harris was unsure of how long these batteries have been onsite. The used batteries did not have adequate labels or markings. **The facility failed to clearly label or mark universal waste batteries (e.g., each battery), or a container in which the batteries are contained, with any one of the following phrases: "Universal Waste—Battery(ies)," or "Waste Battery(ies)," or "Used Battery(ies)." This is a violation of LAC 33:V.3823.A.1.** I also observed empty drums stored adjacent to this area (Attachment 3, Photographs 39-40).

The facility tour proceeded to the southern area of the property. I observed a wash pad with various containers of different capacities (Attachment 3, Photographs 41-42). Mr. Clark stated the wash pad drains to a sump, which is pumped out by ERS themselves and stored in one of their onsite tanks. South of the wash pad, is the facility's only secondary containment system. See Attachment 3, Photographs 43-47. The containment system consists of a berm that is covered with a poly liner. A concrete pad supports two 8,000-gallon tanks and one 15,000-gallon tank within the containment system. A 21,000-gallon frac tank and two horizontal tanks of 4,000-gallon and 6,000-gallon capacities are located within the containment system. One tank was knocked over during Hurricane Laura, according to Mr. Clark. Mr. Clark stated the tanks were used for oily water and used oil storage. **The aboveground tanks used to store used oil were not clearly labeled or marked with the words "Used Oil," which is a violation of LAC 33:V.4035.H.1.**

On the southwestern corner of the facility, I observed several totes of 275 to 300-gallon capacities (Attachment 3, Photographs 48-50). I estimated approximately 30 totes of used oil. According to Mr. Harris and Mr. Clark, the totes contained used oil and oily water. Some of the totes were observed to be empty. The totes of used oil and oily water were positioned on earthen ground and did not have an adequate secondary containment system. **The facility failed to have a secondary containment system for the containers used to store used oil in this area, which is a violation of LAC 33:V.4035.E.** The containers did not have labels. In this area, I observed a few smaller tanks that were leaking (Attachment 3, Photographs 51-54). Mr. Clark confirmed this was likely used oil, and the capacity of the tanks were approximately 1,800 gallons. **The facility failed to store used oil in containers that are in good condition and not leaking, which are violations of LAC 33:V.4035.D.1 and LAC 33:V.4035.D.2, respectively.** Furthermore, the tanks were not labeled. **The facility failed to clearly label or mark containers and aboveground tanks used to store used oil at transfer facilities with the words "Used Oil," which is a violation of LAC 33:V.4035.H.1.** The tanks were positioned on earthen ground without adequate secondary containment. **The facility failed to have a secondary containment system for aboveground tanks used to store used oil in this area, which is a violation of LAC 33:V.4035.F.** Mr. Harris was unable to confirm the volume of the release. I observed absorbent pads on the ground as an attempt to clean up the spill. **The facility failed to comply with LAC 33:V.4035.I, by not performing the following cleanup steps: (1) stop the release; (2) contain the released used oil; (3) clean up and manage properly the released used oil and other materials; and (4) if necessary, repair or replace any leaking used oil storage containers or tanks prior to returning them to service.**

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I observed approximately 30 red containers of roughly 15 to 20-gallon capacity. Mr. Clark stated this was high-temperature grease from a rig operated by Noble Drilling. Mr. Clark stated this material was a product when he received it. The drums extremely deteriorated, and the lids of some drums were rusted through (Attachment 3, Photograph 55-56). The facility also collects used cooking/vegetable oils from customers. I observed several 5-gallon to 55-gallon containers, and one 275-gallon tote that stored these used cooking oils. I also observed evidence of leaking containers and spills of this cooking oil. The spilled cooking oil was migrating from the leaking containers off the concrete slab and onto the earthen ground. **Unauthorized disposal of a solid waste is a violation of LAC 33:VII.315.C.** See Attachment 3, Photographs 57-60 and 81.

On the adjacent property to the east, ERS has seven frac tanks and two aboveground tanks of varying capacities. See Photographs 71-74 of Attachment 3. Mr. Clark stated these tanks contain used oil, oily water, or flashy oil. Mr. Clark stated the tanks are not double-walled; therefore, there is no secondary containment system. **The facility failed to have a secondary containment system for aboveground tanks used to store used oil in this area, which is a violation of LAC 33:V.4035.F.** I did not observe used oil labels on the tanks. **The facility failed to clearly label or mark containers and aboveground tanks used to store used oil at transfer facilities with the words "Used Oil," which is a violation of LAC 33:V.4035.H.1.** On this adjacent property, I observed approximately eight 55-gallon drums of waste paint (Attachment 3, Photograph 75). The labels did not indicate whether this material was hazardous or non-hazardous. Mr. Clark stated these would also need profiling before disposal. **The facility failed to determine if the wastes are hazardous waste in order to ensure the wastes are properly managed according to applicable RCRA regulations, which is a violation of LAC 33:V.1005.A.**

Records Review

The most recent update to the HW-1 was October 27, 2000. This notification indicates the facility generates hazardous wastes with D001, D002, D018, F003, and F005 waste codes. The facility is notified as VSQG, transporter of hazardous waste, and used oil transporter and transfer facility (Attachment 2). At the time of the inspection, ERS was acting as a hazardous waste transfer facility by storing transported hazardous waste onsite and, in some instances, for greater than 10 days allowed for hazardous waste transfer facilities. **The transporter (ERS) failed to notify the Office of Environmental Services (OES) and obtain written approval by the administrative authority prior to storing waste, which is a violation of LAC 33:V.1305.C.**

A review of hazardous waste manifests revealed that that ERS generated and disposed of hazardous waste paint with D001, D035, and U002 waste codes. See Photographs 77-80 of Attachment 3. The waste was transported to NSSI/Recovery Services, Inc. in Houston, TX (TXD982560294). These manifests are dated December 31, 2018 and April 9, 2019. The current HW-1 does not indicate the facility is a generator of D035 and U002 wastes. **The facility failed to notify OES within seven days if any information (i.e. waste codes) submitted in the HW-1 changes, which is a violation of LAC 33:V.1017.A.**

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The facility provided two waste profiles for non-hazardous paint and paint thinners (Attachment 4). The profiles indicate the flash point is greater than 140°F. Hazardous waste transporters are required to develop a spill contingency plan and institute a personnel-training program. I reviewed the facility's contingency plan at the time of the inspection and noted no violations with respect to the contents of the plan. Mr. Clark stated his employees who handle hazardous waste containers or deal with spills are trained on an annual basis; however, he does not maintain records of personnel training.

Mr. Clark provided additional profiles and analytical results via email for oily solids, used oil-contaminated solids, wastewater and tank cleaning bottoms (Attachment 4). Mr. Clark stated the used oil and oily water is recycled through Boudin Oil. I reviewed used oil shipping tickets and manifests from Boudin Oil. I also reviewed records of transporter tickets that ERS issues to facilities when wastes are picked up. Mr. Clark stated ERS uses process or material knowledge when picking up used oil or oil-contaminated solids to determine if the waste is not hazardous. Mr. Clark provided example forms that ERS uses when making determinations for waste pickups (Attachment 4).

Per LAC 33:V.4035.A, used oil transporters are subject to all applicable spill prevention, control, and countermeasures requirements (40 CFR Part 112). When asked to review the facility's SPCC Plan, Mr. Clark stated he does not have a SPCC Plan because it was lost during Hurricane Rita (2005). He stated he has not prepared or implemented a new SPCC. **Failure to comply with all applicable spill prevention, control, and countermeasures requirements is a violation of LAC 33:V.4035.A.**

On January 26, 2023, Mr. Clark provided an update to the inspection via email (Attachment 5). He stated he has secured a consultant to assist him with the HW-1 and SPCC Plan. He stated he has begun cleanup of the various spills noted during the inspection, and has profiles for some of the waste drums. Mr. Clark stated in the email that they are working towards regaining compliance. I requested photographs, manifests, and/or profiles to the progress made, which have not been provided. Mr. Clark has not emailed me with further updates as of completing this report.

EXIT INTERVIEW

An exit interview was conducted and the Field Interview Form (FIF) was discussed with Mr. Clark at the facility on October 27, 2022 (Attachment 1). A copy of the FIF was given to Mr. Clark. I provided contacts for the LDEQ Small Business Assistance Program.

SUMMARY OF OBSERVATIONS

- **The facility failed to label drums of hazardous waste with the words "hazardous waste," which is a violation of LAC 33:V.1009.A.7.**
- **The facility failed to obtain a standard permit for the storage of hazardous waste, which is a violation of LAC 33:V.303.B.**

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- The facility failed to determine if the wastes are hazardous waste in order to ensure the wastes are properly managed according to applicable RCRA regulations, which is a violation of LAC 33:V.1005.A.
- The container of hazardous waste aerosols was not closed, which is a violation of LAC 33:V.1009.A.6.
- The facility failed to have a secondary containment system for the containers used to store used oil in this area, which is a violation of LAC 33:V.4035.E.
- The facility failed to store used oil in containers that are in good condition, which is a violation of LAC 33:V.4035.D.1.
- The facility failed to store used oil in containers that are not leaking, which is a violation of LAC 33:V.4035.D.2.
- The facility failed to comply with LAC 33:V.4035.I, by not performing the following cleanup steps: (1) stop the release; (2) contain the released used oil; (3) clean up and manage properly the released used oil and other materials; and (4) if necessary, repair or replace any leaking used oil storage containers or tanks prior to returning them to service.
- The facility held shipments of used oil for more than 35 days, which is a violation of LAC 33:V.4035.B.
- The facility failed to clearly label or mark containers and aboveground tanks used to store used oil at transfer facilities with the words "Used Oil," which is a violation of LAC 33:V.4035.H.1.
- The facility failed to clearly label or mark universal waste batteries (e.g., each battery), or a container in which the batteries are contained, with any one of the following phrases: "Universal Waste—Battery(ies)," or "Waste Battery(ies)," or "Used Battery(ies)." This is a violation of LAC 33:V.3823.A.1.
- Unauthorized disposal of a solid waste is a violation of LAC 33:VII.315.C.
- The facility failed to have a secondary containment system for aboveground tanks used to store used oil in this area, which is a violation of LAC 33:V.4035.F.
- The transporter (ERS) failed to notify the Office of Environmental Services (OES) and obtain written approval by the administrative authority prior to storing waste, which is a violation of LAC 33:V.1305.C.

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Inspection Date: Oct. 24, 2022 – Oct. 27, 2022

- **The facility failed to notify OES within seven days if any information (i.e. waste codes) submitted in the HW-1 changes, which is a violation of LAC 33:V.1017.A.**
- **Failure to comply with all applicable spill prevention, control, and countermeasures requirements is a violation of LAC 33:V.4035.A.**

AI No.: 29918
Alt. ID No.: LAR000026534

Facility Name: Environmental Response Services
Inspection Date: Oct. 24, 2022 – Oct. 27, 2022

LIST OF ATTACHMENTS

ATTACHMENT 1	Field Interview Form
ATTACHMENT 2	Hazardous Waste Notification Form (dated 10/27/2000)
ATTACHMENT 3	Photographs
ATTACHMENT 4	Waste Profiles & Analytical Results
ATTACHMENT 5	Email Correspondence
ATTACHMENT 6	2022 Aerial Imagery

AI No.: 29918
Alt. ID No.: LAR000026534

Facility Name: Environmental Response Services
Inspection Date: Oct. 24, 2022 – Oct. 27, 2022

ATTACHMENT 1

Field Interview Form (2 Pages)

**LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY
FIELD INTERVIEW FORM**

AGENCY INTEREST#: 29918 INSPECTION DATE: 10/24/2022 TIME OF ARRIVAL: 0945
 ALTERNATE ID#: LAR000026534 DEPARTURE DATE: 10/27/2022 TIME OF DEPARTURE: 1200
(ID Type/Number)
 FACILITY NAME: Environmental Response Services, Inc. PHONE #: (337) 562 0001
 LOCATION: B5B3 Joe Ledoux Rd.
Lake Charles, LA 70605 PARISH: Calcasieu
 RECEIVING STREAM (BASIN/SUBSEGMENT): _____
 MAILING ADDRESS: P.O. Box 4288 Lake Charles LA 70606
(Street/P.O. Box) (City) (State) (Zip)
 FACILITY REPRESENTATIVE: Denny Harris TITLE: yard hand
 FACILITY REPRESENTATIVE PHONE NUMBER: same as above
 NAME, TITLE, ADDRESS and TELEPHONE of RESPONSIBLE OFFICIAL (if different from above):
Neil Clark / Owner / 337 562 0001 / 337 912 1580

INSPECTION TYPE: VSQG CEI PROGRAM INVOLVED: AIR ☐ WASTE ☒ WATER ☐ OTHER: Hazardous

INSPECTOR'S OBSERVATIONS: (e.g. AREAS AND EQUIPMENT INSPECTED, PROBLEMS, DEFICIENCIES, REMARKS, VERBAL COMMITMENTS FROM FACILITY REPRESENTATIVES)

A routine hazardous waste compliance evaluation inspection was conducted. The facility is currently notified as a VSQG, hazardous waste transporter, and used oil transport and transfer facility. Numerous used oil drums were onsite, greater than the allowable time of 35 days for used oil transporter/transfer facilities. Some drums were not labeled with the words 'used oil'. 8 tanks total without secondary containment. Containers/Drums not on secondary containment. Several totes with 275-350 gallon capacities containing used oil/oily water observed onsite, outside of containment.

AREAS OF CONCERN:

REGULATION	EXPLANATION	CORRECTED?
_____	_____	YES ☐ NO ☐
_____	_____	YES ☐ NO ☐

PHOTOS TAKEN: YES ☒ NO ☐ SAMPLES TAKEN: YES ☐ NO ☒ (Attach Chain-of-Custody)

RECEIVED BY SIGNATURE: X Neil Clark

PRINT NAME: X Neil Clark

(NOTE: SIGNATURE DOES NOT INDICATE AGREEMENT WITH INSPECTOR'S NOTES)

INSPECTOR(S): Agueda Elena Mayard
Laura Bruchmans, Jason Roy

CROSS REFERENCE: _____

REVIEWER: Fatiguer 10/27/2022

ATTACHMENTS: _____

NOTE: The information contained on this form reflects only the preliminary observations of the inspector(s). It should not be interpreted as a final determination by the Department of Environmental Quality or any of its officers or personnel as to any matter, including, but not limited to, a determination of compliance or lack thereof by the facility operator with any requirements of statutes regulations or permits. Each day of non-compliance constitutes a separate violation of the regulations and/or the Louisiana Environmental Quality Act.

COPY

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY
INSPECTOR OBSERVATIONS (cont'd)

AGENCY INTEREST#: 29918 ALTERNATE ID#: LAR000026531 INSPECTION DATE: 10/24/2022
FACILITY NAME: Environmental Response Services, Inc. 10/27/2022

INSPECTOR OBSERVATIONS CONT'd:

- Approx. 20 hazardous waste drums observed onsite. Some were not labeled with the words 'hazardous waste'; indication of contents and hazards, or dated.
- Some hazardous waste drums have been onsite for up to 2 years (stated by Mr. Clark), without waste determinations.
- 5 used oil tanks within secondary containment were observed, however, not labeled with words 'used oil'. Spills were noted throughout the facility, ^{some} with attempts of cleaning by applying absorbents but not picked up.
 - HW, non-hazardous, universal, and used oil manifests/shipping tickets were reviewed. Waste codes listed on a HW manifest date 12/31/18 are not indicated on the HW-Notification form.
- Facility does not have an SPCC Plan, Mr. Clark stated it was lost during H. Rita and has not been replaced. Haz Woper training is conducted for employees; however records are not maintained.
- Records of waste determinations were requested by EOB 11/3/22
 - Spill contingency plan was reviewed onsite.
 - Containers of cooking oil/grease observed on west side of facility. A spill was noted migrating off of concrete slab.
 - many containers/drums were noted as being rusted and in deteriorated conditions, which included materials of hazardous waste, used oil, oily water, cooking oil, grease, etc.

[Signature] 10/27/22

INITIALS OF RECEIPT NC

COPY

AI No.: 29918
Alt. ID No.: LAR000026534

Facility Name: Environmental Response Services
Inspection Date: Oct. 24, 2022 – Oct. 27, 2022

ATTACHMENT 2

Hazardous Waste Notification Form (dated 10/27/2000) (2 Pages)

c: Lourdes

29918

LOUISIANA NOTIFICATION OF HAZARDOUS WASTE ACTIVITY
 STATE OF LOUISIANA
 DEPARTMENT OF ENVIRONMENTAL QUALITY
 HAZARDOUS WASTE DIVISION
 P.O. BOX 82178 BATON ROUGE, LA 70884-2178

INSTALLATION'S EPA ID NUMBER: **LAR000026534** NOTIFICATION TYPE: ☐ FIRST ☒ SUBSEQUENT

NAME OF INSTALLATION (include company and specific site name): **ENVIRONMENTAL RESPONSE SERVICES INC**

INSTALLATION LOCATION ADDRESS (physical address, not p.o. box, route number, or highway number):
8583 Joe Ledoux Rd
 CITY OR TOWN: **LAKE CHARLES** STATE: **LA** ZIP CODE: **70605-0322**
 PARISH NAME: **CALCASIEU** PARISH CODE: **0191** SIC CODE: **799** LATITUDE: LONGITUDE:

INSTALLATION CONTACT (person to be contacted regarding waste activities at site):
 LAST NAME: **CLARK** FIRST NAME: **NEIL** JOB TITLE: **PRESIDENT** PHONE NUMBER: **(337) 562-0001**
 AREA CODE:

INSTALLATION MAILING ADDRESS
 STREET, P.O. BOX OR ROUTE NUMBER: **P.O. Box 4288**
 CITY OR TOWN: **LAKE CHARLES** STATE: **LA** ZIP CODE: **70606-4288**

INSTALLATION OWNER (legal owner of installation):
 NAME: **ENVIRONMENTAL RESPONSE SERVICES INC** PHONE NUMBER: **(337) 562-0001**
 STREET, P.O. BOX OR ROUTE NUMBER: **P.O. BOX 4288**
 CITY OR TOWN: **LAKE CHARLES** STATE: **LA** ZIP CODE: **70606-4288**

CHANGE OF OWNER INDICATOR: YES ☐ NO ☒ Date Changed (Month, Day, Year):
 Property Owner (if different from installation owner): **FRED LEGER** SIGNATURE: **FRED LEGER**

INSTALLATION CLASSIFICATION (ALL THREE CATEGORIES MUST BE COMPLETED)
 TYPES: F=Federal S=State I=Indian P=Private C=Parish M=Municipal O=Other
 Owner Type: **P** Operator Type: **P** Property Type: **P**

For Official Use Only

CHECK NUMBER:

was: ERS Envire Resp Svc

NOV 17 2000
 RCRA Info
 Regs & Certs
 Please use
 EXCEL
 Other

Neil Clark

The ORIGINAL Application Listed
 had FRED Leger AS Installation OWNER.
 My INEXPERIENCE in these forms put him there
 Instead of US (ERS). He only owns the Property
 and not the facility.

TOTAL P.03

AI No.: 29918
Alt. ID No.: LAR000026534

Facility Name: Environmental Response Services
Inspection Date: Oct. 24, 2022 – Oct. 27, 2022

ATTACHMENT 3

Photographs (41 Pages)



Photo #: 1 Of 81 Date: 10/24/2022 Time: 09:46 AM
 Description: Southwest of the main office, I observed numerous drums of non-hazardous waste and some hazardous waste drums. The facility representative stated drums are pickup from businesses and brought to their facility.



Photo #: 2 Of 81 Date: 10/24/2022 Time: 9:50 AM
 Description: Drums of waste paint located southwest of the main office.

Site	Environmental Response Services, Inc. (ERS)	Location:	8583 Joe Ledoux Road		
City:	Lake Charles	Parish:	Calcasieu	Photographer	Elena Mayard



Photo #: 3 Of 81 Date: 10/24/2022 Time: 09:50 AM
Description: Drums of engine oil product that were showing signs of deterioration and rusting.

Site	Environmental Response Services, Inc. (ERS)	Location:	8583 Joe Ledoux Road		
City:	Lake Charles	Parish:	Calcasieu	Photographer	Elena Mayard



Photo #: 4 Of 81 Date: 10/24/2022 Time: 9:47 AM
Description: A 55-gallon drum labeled "Waste Paint." This is a close-up photograph of a drum from Photograph 2.

Site	Environmental Response Services, Inc. (ERS)	Location:	8583 Joe Ledoux Road		
City:	Lake Charles	Parish:	Calcasieu	Photographer	Elena Mayard



Photo #: 5 Of 81 Date: 10/24/2022 Time: 9:47 AM
 Description: A 55-gallon drum labeled "Aerosol Liquids." This is a close-up photograph of a drum from Photograph 2.

Site	Environmental Response Services, Inc. (ERS)	Location:	8583 Joe Ledoux Road		
City:	Lake Charles	Parish:	Calcasieu	Photographer	Elena Mayard



Photo #: 6 Of 81 Date: 10/24/2022 Time: 9:51 AM
 Description: A 55-gallon drum labeled "Waste Paint | Flammable Liquid." This is a close-up photograph of a drum from Photograph 2.

Site	Environmental Response Services, Inc. (ERS)	Location:	8583 Joe Ledoux Road		
City:	Lake Charles	Parish:	Calcasieu	Photographer	Elena Mayard

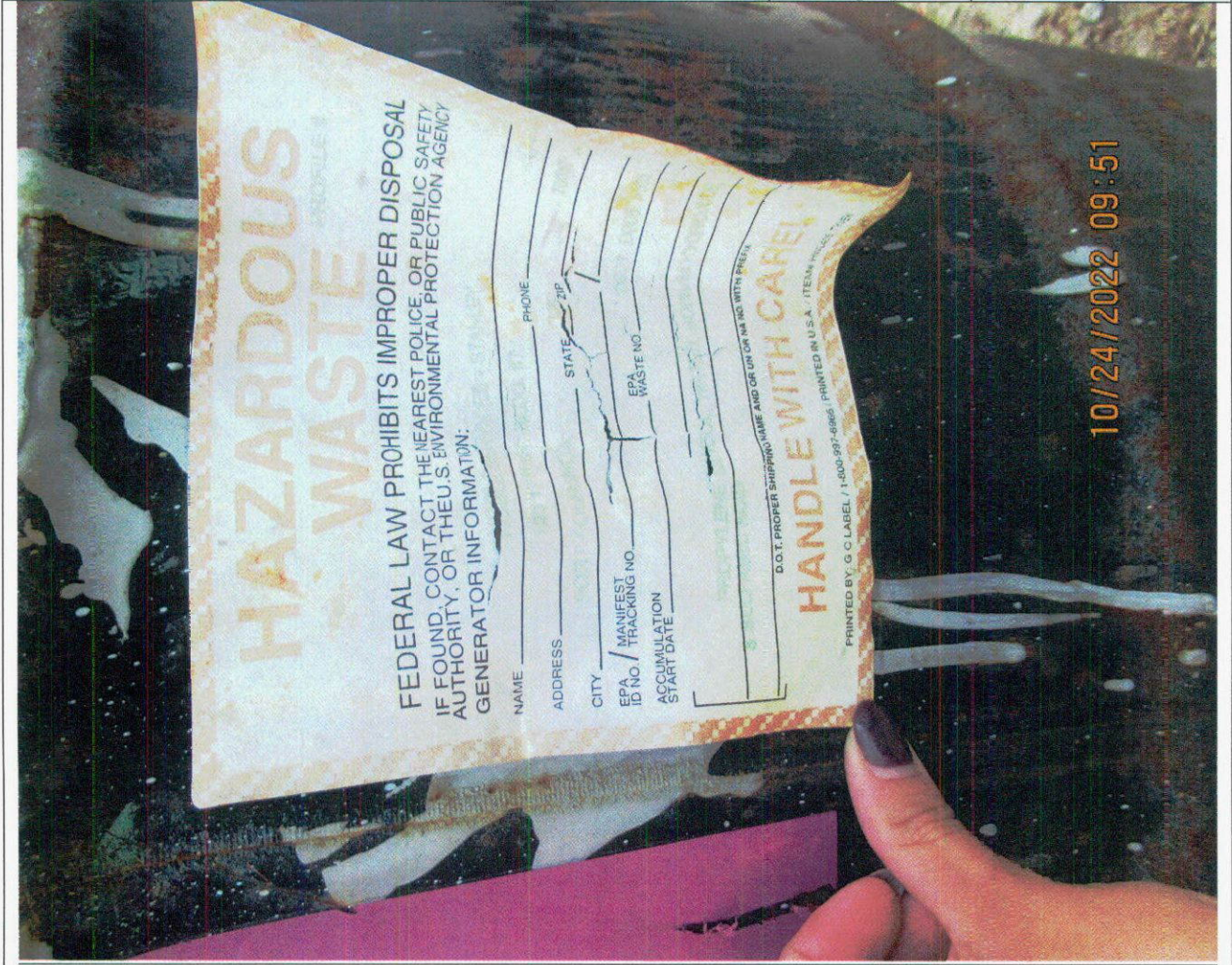


Photo #: 7 Of 81 Date: 10/24/2022 Time: 9:51 AM
Description: A 55-gallon drum labeled "Flammable." This is a close-up photograph of a drum from Photograph 2.

Site	Environmental Response Services, Inc. (ERS)	Location:	8583 Joe Ledoux Road		
City:	Lake Charles	Parish:	Calcasieu	Photographer	Elena Mayard



Photo #: 8 Of 81 Date: 10/24/2022 Time: 9:51 AM
Description: I observed a 55-gallon drum with a hazardous waste label that indicated the waste was generated by Noble Services – Stanley in Port Fourchon. The drum was labeled with an additional tag that had "3/22." This hazardous waste drum has been onsite for greater than the allowed 10 days.

Site	Environmental Response Services, Inc. (ERS)	Location:	8583 Joe Ledoux Road		
City:	Lake Charles	Parish:	Calcasieu	Photographer	Elena Mayard
					
Photo #: 9 Of 81 Date: 10/24/2022 Time: 9:51 AM					
Description: Close-up photograph of the label from drum shown in Photograph 8. This hazardous waste drum has been onsite for greater than the allowed 10 days.					

Site	Environmental Response Services, Inc. (ERS)	Location:	8583 Joe Ledoux Road		
City:	Lake Charles	Parish:	Calcasieu	Photographer	Elena Mayard
					
Photo #: 10 Of 81 Date: 10/24/2022 Time: 9:51 AM					
Description: Close-up photograph of the dated tag from drum shown in Photograph 8. This hazardous waste drum has been onsite for greater than the allowed 10 days.					



Photo #: 11 Of 81 Date: 10/24/2022 Time: 9:51 AM
Description: Second 55-gallon drum with a hazardous waste label that indicated the waste was generated by Noble Services – Stanley in Port Fourchon. This hazardous waste drum has been onsite for greater than the allowed 10 days.

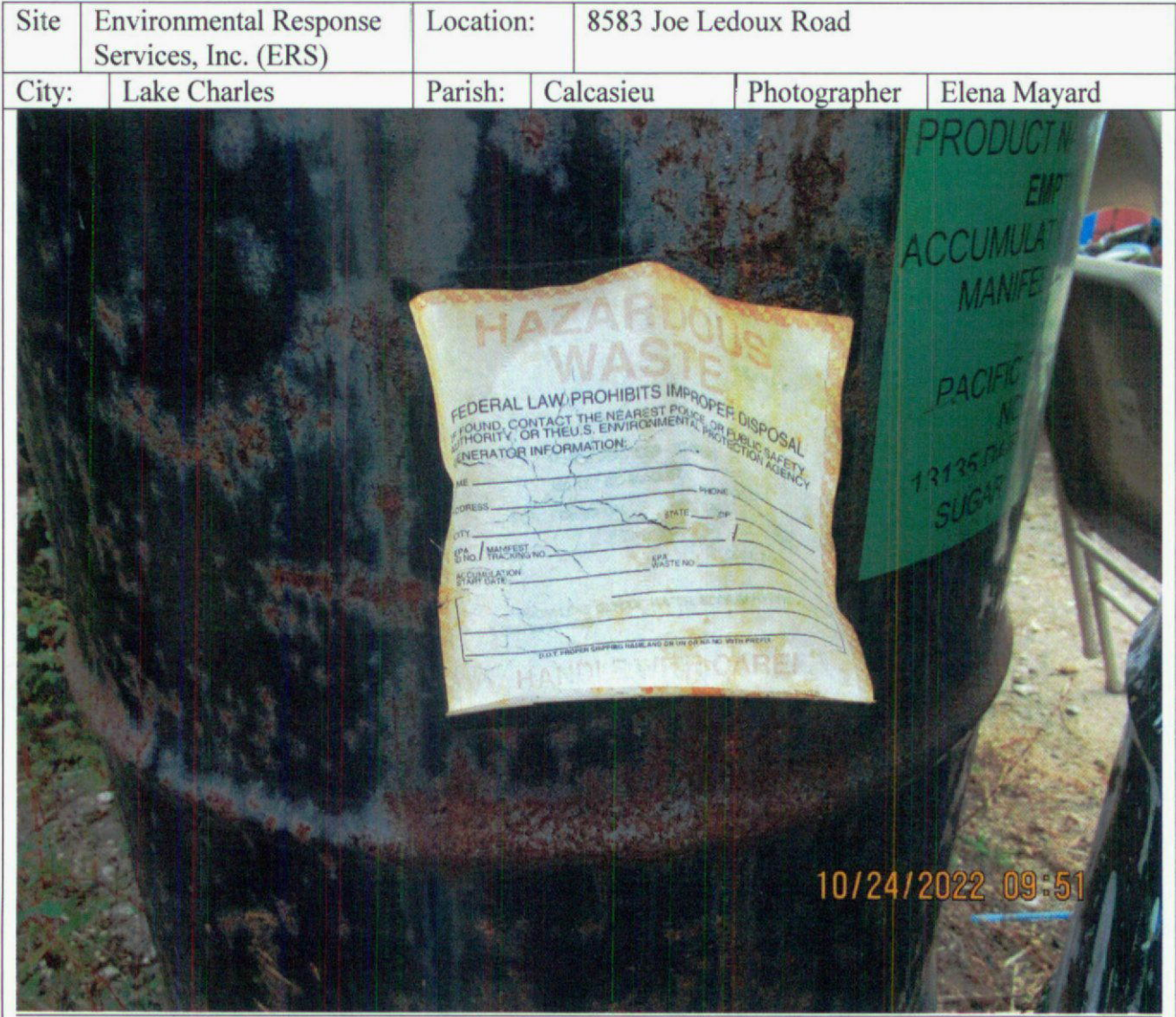


Photo #: 12 Of 81 Date: 10/24/2022 Time: 9:51 AM
Description: Close-up photograph of the label from drum shown in Photograph 12. This hazardous waste drum has been onsite for greater than the allowed 10 days. It was tagged with a MM/YY label of the date it was picked up, specifically 03/22.

Site	Environmental Response Services, Inc. (ERS)	Location:	8583 Joe Ledoux Road		
City:	Lake Charles	Parish:	Calcasieu	Photographer	Elena Mayard



Photo #: 13 Of 81 Date: 10/24/2022 Time: 9:52 AM

Description: I observed a green 55-gallon drum that contained paint, according to the tags. A manifest (Photograph 76) indicated this was a hazardous waste. The drum was not labeled adequately.

Site	Environmental Response Services, Inc. (ERS)	Location:	8583 Joe Ledoux Road		
City:	Lake Charles	Parish:	Calcasieu	Photographer	Elena Mayard

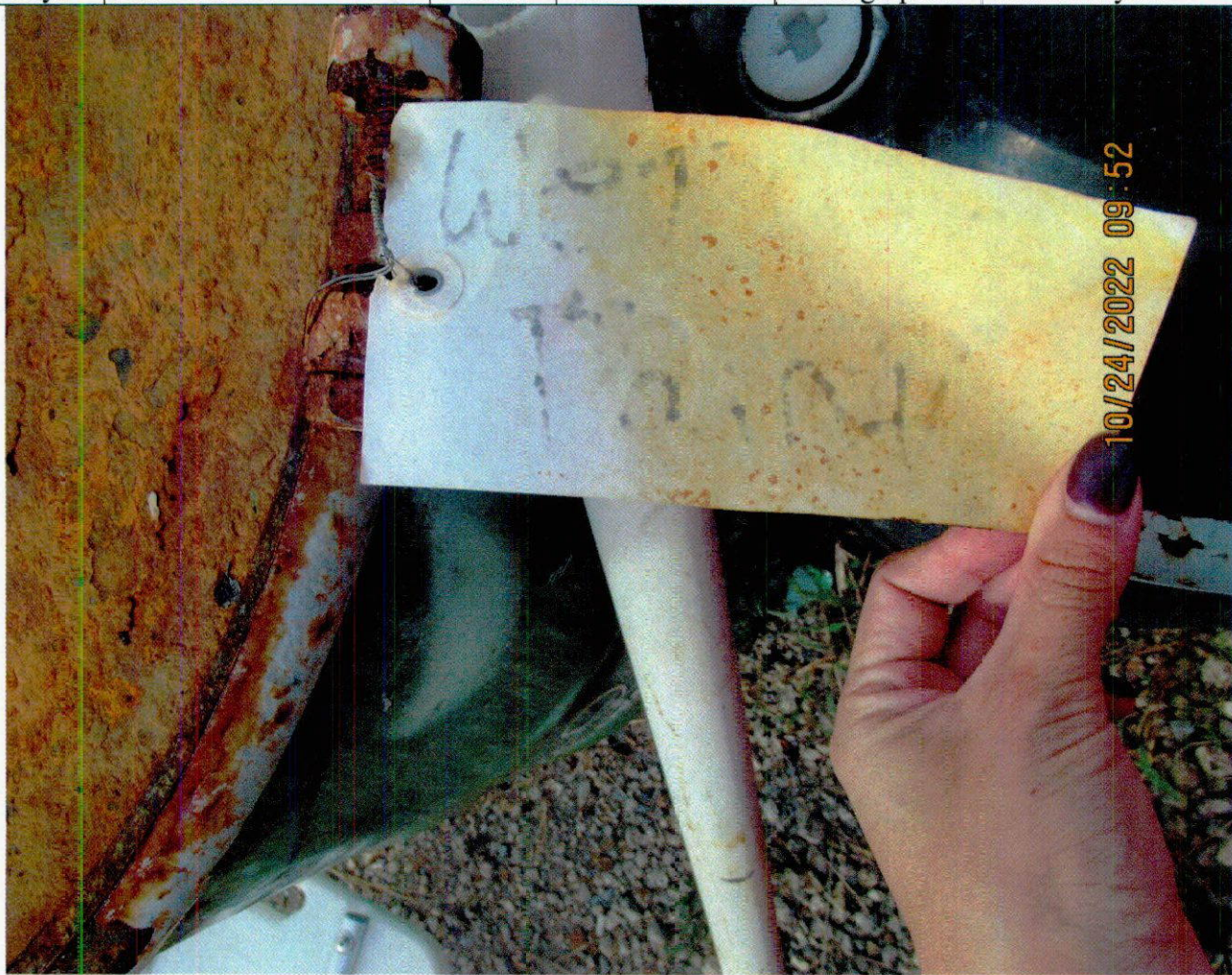


Photo #: 14 Of 81 Date: 10/24/2022 Time: 9:52 AM

Description: The tags were also marked with a date "3/22," and indicated Breaux Petro generated the waste. This hazardous waste drum was transported to ERS and has been onsite greater than the allowed 10 days.

Site	Environmental Response Services, Inc. (ERS)	Location:	8583 Joe Ledoux Road		
City:	Lake Charles	Parish:	Calcasieu	Photographer	Elena Mayard



Photo #: 15 Of 81 Date: 10/24/2022 Time: 9:563 AM
 Description: Another 55-gallon drum of hazardous waste paint generated by Breaux Petroleum and transported to the facility by ERS themselves.

Site	Environmental Response Services, Inc. (ERS)	Location:	8583 Joe Ledoux Road		
City:	Lake Charles	Parish:	Calcasieu	Photographer	Elena Mayard



Photo #: 16 Of 81 Date: 10/24/2022 Time: 9:53 AM
 Description: Close-up photograph of the tag from Photograph 15. Manifests indicate this was hazardous waste paint and has been onsite since March 2022.

Site	Environmental Response Services, Inc. (ERS)	Location:	8583 Joe Ledoux Road		
City:	Lake Charles	Parish:	Calcasieu	Photographer	Elena Mayard



Photo #: 17 Of 81 Date: 10/24/2022 Time: 9:48 AM
 Description: A 55-gallon drum with a puncture device storing aerosol liquids. The drum was full at the time. Mr. Harris stated this was hazardous waste generated at ERS. The drum was not adequately labeled.

Site	Environmental Response Services, Inc. (ERS)	Location:	8583 Joe Ledoux Road		
City:	Lake Charles	Parish:	Calcasieu	Photographer	Elena Mayard



Photo #: 18 Of 81 Date: 10/24/2022 Time: 9:49 AM
 Description: I observed an open top drum of aerosol cans. The drum was full, lacking labels, and not closed. Mr. Harris confirmed this was hazardous waste generated by ERS.

Site	Environmental Response Services, Inc. (ERS)	Location:	8583 Joe Ledoux Road		
City:	Lake Charles	Parish:	Calcasieu	Photographer	Elena Mayard



Photo #: 19 Of 81 Date: 10/24/2022 Time: 9:54 AM
 Description: Several drums of used oil, oily water, and some hazardous waste drums were observed on the east side of the facility. The drums, specifically used oil drums, were on earthen ground and did not have an adequate secondary containment system.

Site	Environmental Response Services, Inc. (ERS)	Location:	8583 Joe Ledoux Road		
City:	Lake Charles	Parish:	Calcasieu	Photographer	Elena Mayard

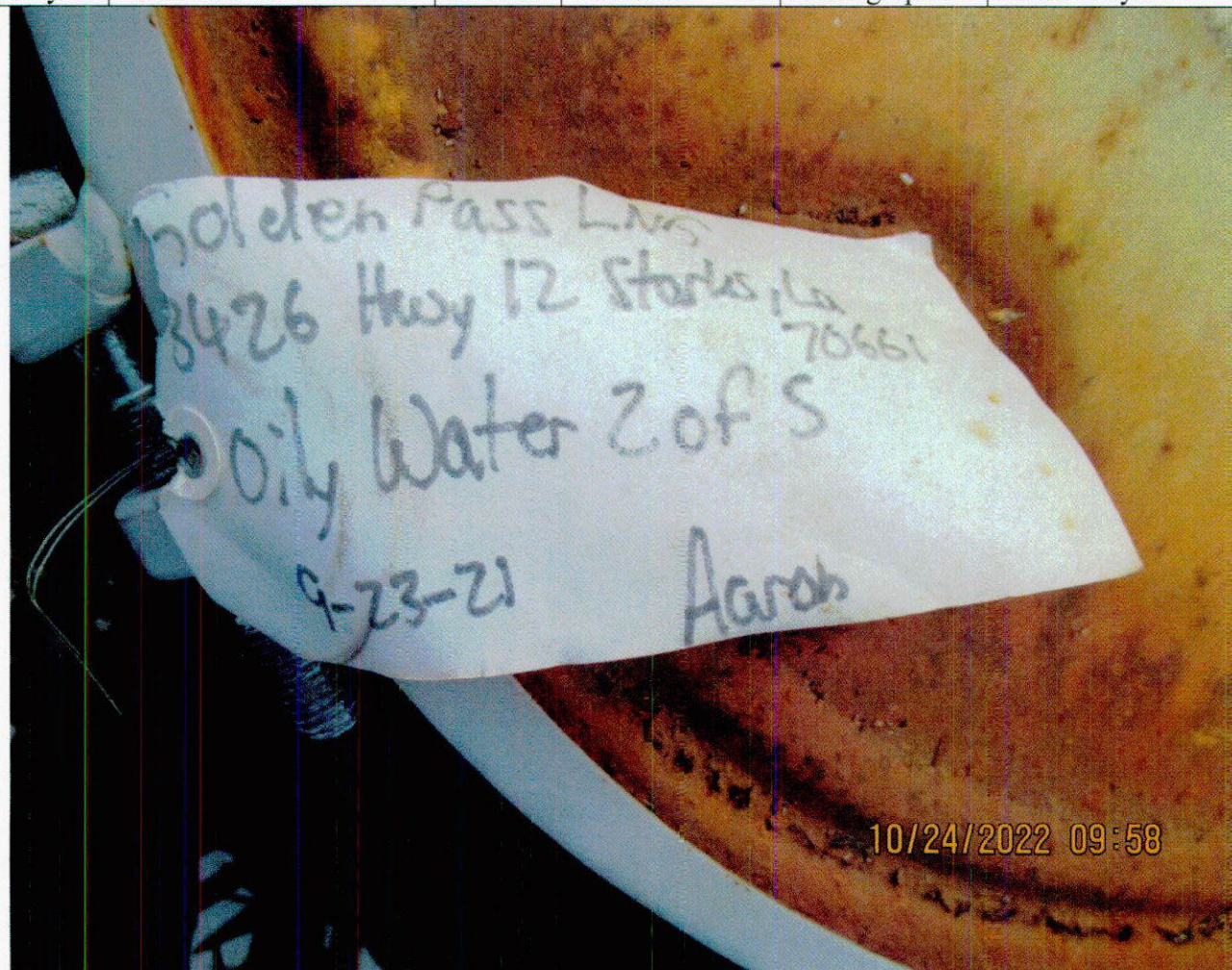


Photo #: 20 Of 81 Date: 10/24/2022 Time: 9:58 AM
 Description: One drum of oily water that has been onsite since 9/23/21, according to the tag. The drum has significant rusting on the lid.

Site	Environmental Response Services, Inc. (ERS)	Location:	8583 Joe Ledoux Road		
City:	Lake Charles	Parish:	Calcasieu	Photographer	Elena Mayard



Photo #: 21 Of 81 Date: 10/24/2022 Time: 9:58 AM
 Description: Photograph demonstrating the condition of another drum storing used oil.

Site	Environmental Response Services, Inc. (ERS)	Location:	8583 Joe Ledoux Road		
City:	Lake Charles	Parish:	Calcasieu	Photographer	Elena Mayard



Photo #: 22 Of 81 Date: 10/24/2022 Time: 10:00 AM
 Description: Angle demonstrating the excessive amount of waste stored onsite. The drums are showing signs of deterioration. The drums are storing used oil, oily water, oil contaminated solids, and hazardous waste.

Site	Environmental Response Services, Inc. (ERS)	Location:	8583 Joe Ledoux Road		
City:	Lake Charles	Parish:	Calcasieu	Photographer	Elena Mayard



Photo #: 23 Of 81 Date: 10/24/2022 Time: 10:13 AM
 Description: Several drums were not adequately labeled as used oil. The drums are significantly rusted.

Site	Environmental Response Services, Inc. (ERS)	Location:	8583 Joe Ledoux Road		
City:	Lake Charles	Parish:	Calcasieu	Photographer	Elena Mayard



Photo #: 24 Of 81 Date: 10/24/2022 Time: 10:03 AM
 Description: Drum of paint chips that was duct-taped. The lid is not secure and the drum is not labeled. The facility representatives were unable to determine if this was characteristic hazardous waste or non-hazardous waste.

Site	Environmental Response Services, Inc. (ERS)	Location:	8583 Joe Ledoux Road		
City:	Lake Charles	Parish:	Calcasieu	Photographer	Elena Mayard



Photo #: 25 Of 81 Date: 10/24/2022 Time: 10:02 AM
 Description: I observed a spill of used oil. These drums are not in a secondary containment system. The drums were positioned on earthen ground.

Site	Environmental Response Services, Inc. (ERS)	Location:	8583 Joe Ledoux Road		
City:	Lake Charles	Parish:	Calcasieu	Photographer	Elena Mayard



Photo #: 26 Of 81 Date: 10/24/2022 Time: 10:04 AM
 Description: Different angle of the spill noted in Photograph 25.

Site	Environmental Response Services, Inc. (ERS)	Location:	8583 Joe Ledoux Road		
City:	Lake Charles	Parish:	Calcasieu	Photographer	Elena Mayard



Photo #: 27 Of 81 Date: 10/24/2022 Time: 10:04 AM
Description: Another spill/release was discovered during the facility tour.

Site	Environmental Response Services, Inc. (ERS)	Location:	8583 Joe Ledoux Road		
City:	Lake Charles	Parish:	Calcasieu	Photographer	Elena Mayard



Photo #: 28 Of 81 Date: 10/24/2022 Time: 10:05 MA
Description: Third spill noted during the facility tour.

Site	Environmental Response Services, Inc. (ERS)	Location:	8583 Joe Ledoux Road		
City:	Lake Charles	Parish:	Calcasieu	Photographer	Elena Mayard



Photo #: 29 Of 81 Date: 10/24/2022 Time: 10:05 AM
 Description: 55-gallon drum of used oil that was picked up and transported by ERS to their facility on 8/3/2022, according to the label. This drum of used oil has been onsite for greater than the allowed 35 days for used oil transfer facilities.

Site	Environmental Response Services, Inc. (ERS)	Location:	8583 Joe Ledoux Road		
City:	Lake Charles	Parish:	Calcasieu	Photographer	Elena Mayard

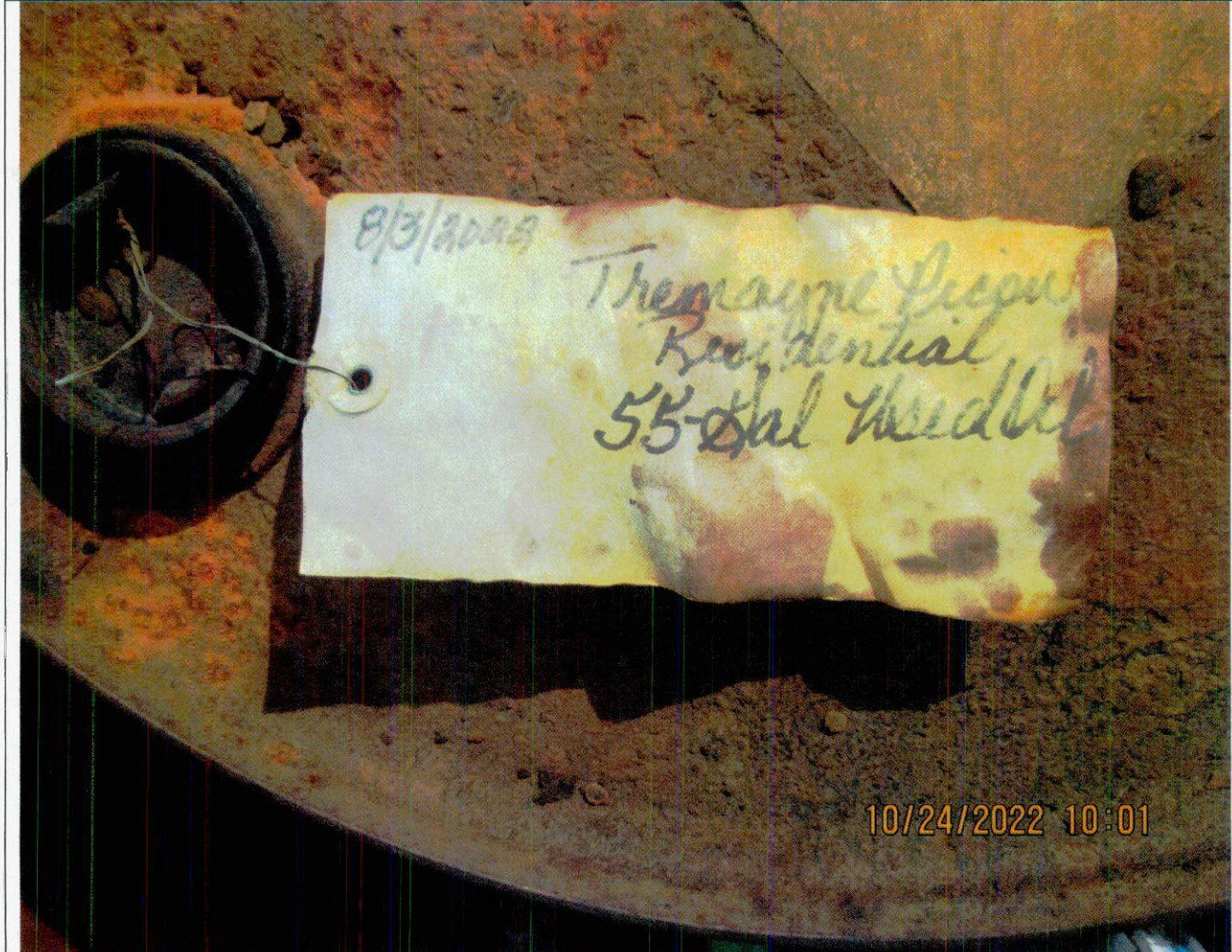


Photo #: 30 Of 81 Date: 10/24/2022 Time: 10:01 AM
 Description: Close-up angle of the tag that was on the drum shown in Photograph 29. This drum of used oil has been onsite for greater than the allowed 35 days for used oil transfer facilities.

Site	Environmental Response Services, Inc. (ERS)	Location:	8583 Joe Ledoux Road		
City:	Lake Charles	Parish:	Calcasieu	Photographer	Elena Mayard

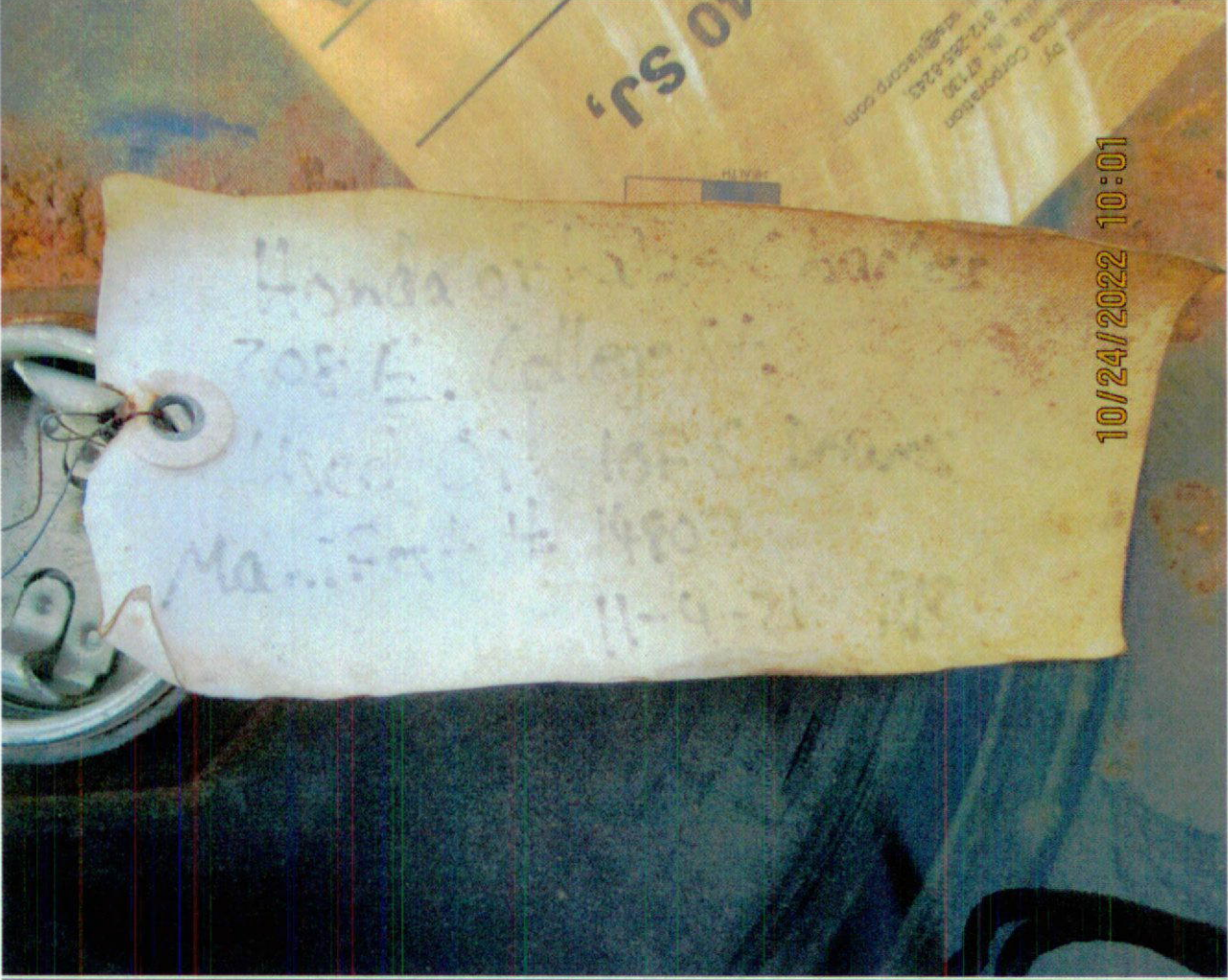


Photo #: 31 Of 81 Date: 10/24/2022 Time: 10:01 AM

Description: Tag of a used oil drum that was transferred to the facility on 11/9/2021, according to the label. The tag also indicates this is one of 5 drums.

Site	Environmental Response Services, Inc. (ERS)	Location:	8583 Joe Ledoux Road		
City:	Lake Charles	Parish:	Calcasieu	Photographer	Elena Mayard



Photo #: 32 Of 81 Date: 10/24/2022 Time: 10:01 AM

Description: 55-gallon drum of used oil that has been onsite since 11/9/2021. The tag for this drum is shown in Photograph 31.

Site	Environmental Response Services, Inc. (ERS)	Location:	8583 Joe Ledoux Road		
City:	Lake Charles	Parish:	Calcasieu	Photographer	Elena Mayard



Photo #: 33 Of 81 Date: 10/24/2022 Time: 9:55 AM

Description: Drum that is lacking labels indicating the contents.

Site	Environmental Response Services, Inc. (ERS)	Location:	8583 Joe Ledoux Road		
City:	Lake Charles	Parish:	Calcasieu	Photographer	Elena Mayard



Photo #: 34 Of 81 Date: 10/24/2022 Time: 10:00 AM

Description: Another angle demonstrating the large amount of waste the facility has onsite. There are several drums of used oil directly on the ground. Several of the drums did not have labels.

Site	Environmental Response Services, Inc. (ERS)	Location:	8583 Joe Ledoux Road		
City:	Lake Charles	Parish:	Calcasieu	Photographer	Elena Mayard



10/24/2022 10:05

Photo #: 35 Of 81 Date: 10/24/2022 Time: 10:05 AM
 Description: Another angle demonstrating the large amount of waste the facility has onsite. There are several drums of used oil directly on the ground. Several of the drums did not have labels.

Site	Environmental Response Services, Inc. (ERS)	Location:	8583 Joe Ledoux Road		
City:	Lake Charles	Parish:	Calcasieu	Photographer	Elena Mayard



10/24/2022 10:06

Photo #: 36 Of 81 Date: 10/24/2022 Time: 10:06 AM
 Description: Severely rusted and deteriorated drums of used oil.

Site	Environmental Response Services, Inc. (ERS)	Location:	8583 Joe Ledoux Road		
City:	Lake Charles	Parish:	Calcasieu	Photographer	Elena Mayard



Photo #: 37 Of 81 Date: 10/24/2022 Time: 10:05 AM

Description: Another area of waste storage.

Site	Environmental Response Services, Inc. (ERS)	Location:	8583 Joe Ledoux Road		
City:	Lake Charles	Parish:	Calcasieu	Photographer	Elena Mayard



Photo #: 38 Of 81 Date: 10/24/2022 Time: 10:00 AM

Description: I observed a pallet of used batteries. Mr. Harris was unsure of how long these batteries have been onsite. The used batteries did not have adequate labels or markings.

Site	Environmental Response Services, Inc. (ERS)	Location:	8583 Joe Ledoux Road		
City:	Lake Charles	Parish:	Calcasieu	Photographer	Elena Mayard



Photo #: 39 Of 81 Date: 10/24/2022 Time: 9:58 AM
 Description: The facility also stores empty drums adjacent to the waste storage areas.

Site	Environmental Response Services, Inc. (ERS)	Location:	8583 Joe Ledoux Road		
City:	Lake Charles	Parish:	Calcasieu	Photographer	Elena Mayard



Photo #: 40 Of 81 Date: 10/24/2022 Time: 9:58 AM
 Description: Storage area for empty drums.

Site	Environmental Response Services, Inc. (ERS)	Location:	8583 Joe Ledoux Road		
City:	Lake Charles	Parish:	Calcasieu	Photographer	Elena Mayard



Photo #: 41 Of 81 Date: 10/24/2022 Time: 10:08 AM

Description: I observed a wash pad with various containers of different capacities. Some stored used oil, others stored chemical products. According to facility representatives, the wash pad drains to a sump, which is pumped out by ERS themselves and stored in one of their onsite tanks.

Site	Environmental Response Services, Inc. (ERS)	Location:	8583 Joe Ledoux Road		
City:	Lake Charles	Parish:	Calcasieu	Photographer	Elena Mayard



Photo #: 42 Of 81 Date: 10/24/2022 Time: 10:08 AM

Description: Another angle of the wash pad and various containers of used oil and chemical products.

Site	Environmental Response Services, Inc. (ERS)	Location:	8583 Joe Ledoux Road		
City:	Lake Charles	Parish:	Calcasieu	Photographer	Elena Mayard

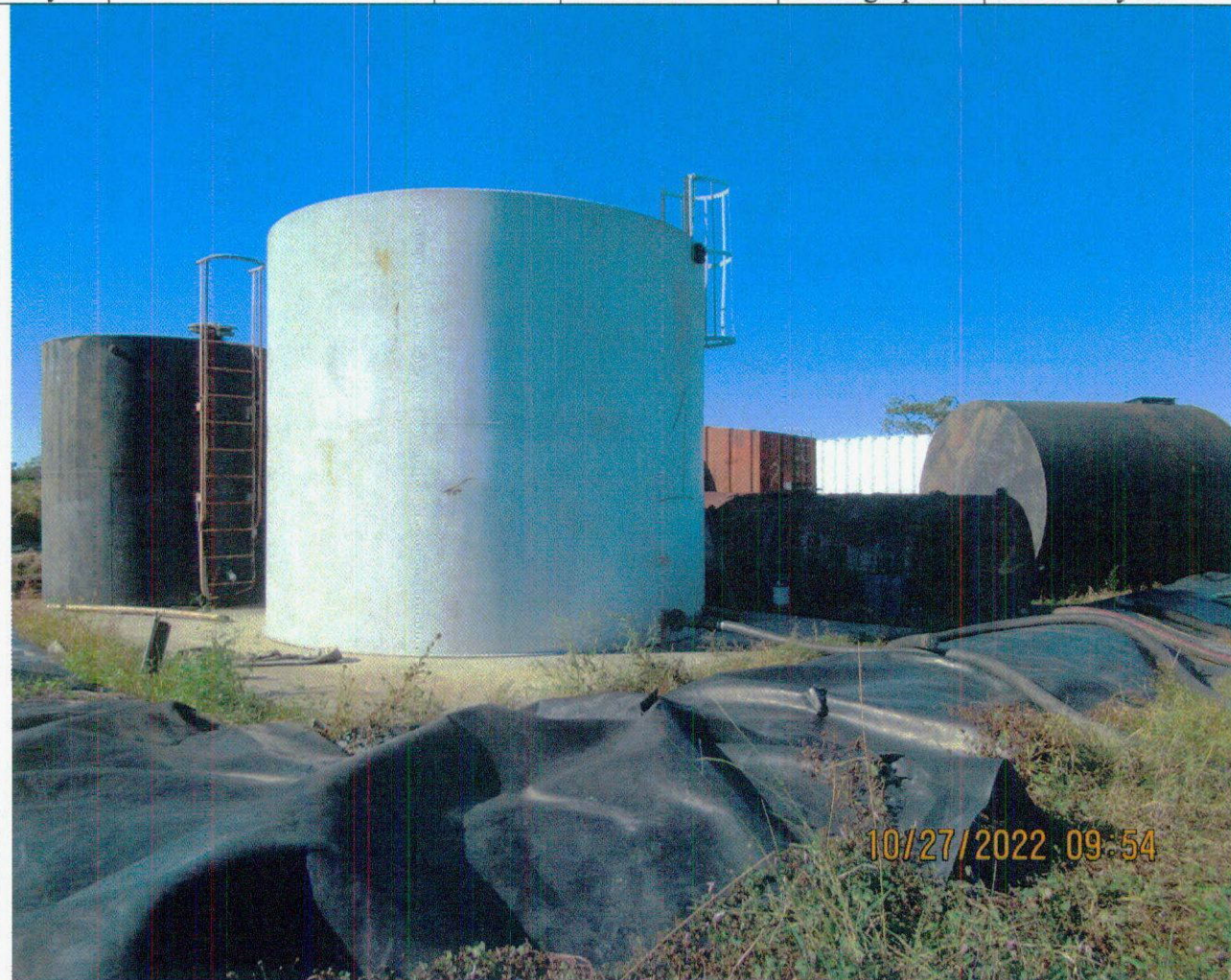


Photo #: 43 Of 81 Date: 10/27/2022 Time: 9:54 AM

Description: The facility's tank farm is located on the south end of the property. This area is used for oily water storage and used oil storage. The containment system consists of a berm that is covered with a poly liner. A concrete pad supports two 8,000-gallon tanks and one 15,000-gallon tank within the containment system.

Site	Environmental Response Services, Inc. (ERS)	Location:	8583 Joe Ledoux Road		
City:	Lake Charles	Parish:	Calcasieu	Photographer	Elena Mayard



Photo #: 44 Of 81 Date: 10/27/2022 Time: 9:54 AM

Description: Two horizontal tanks of 4,000-gallon and 6,000-gallon capacities are located within the containment system. One tank was knocked over during Hurricane Laura.

Site	Environmental Response Services, Inc. (ERS)	Location:	8583 Joe Ledoux Road		
City:	Lake Charles	Parish:	Calcasieu	Photographer	Elena Mayard



Photo #: 45 Of 81 Date: 10/27/2022 Time: 10:00 AM
 Description: A 21,000-gallon frac tank was located within the containment system, along with four totes.

Site	Environmental Response Services, Inc. (ERS)	Location:	8583 Joe Ledoux Road		
City:	Lake Charles	Parish:	Calcasieu	Photographer	Elena Mayard



Photo #: 46 Of 81 Date: 10/27/2022 Time: 10:00 AM
 Description: A poly liner surrounds the containment system.

Site	Environmental Response Services, Inc. (ERS)	Location:	8583 Joe Ledoux Road		
City:	Lake Charles	Parish:	Calcasieu	Photographer	Elena Mayard



Photo #: 47 Of 81 Date: 10/24/2022 Time: 10:09 AM
 Description: The aboveground tanks used to store used oil were not clearly labeled or marked with the words "Used Oil."

Site	Environmental Response Services, Inc. (ERS)	Location:	8583 Joe Ledoux Road		
City:	Lake Charles	Parish:	Calcasieu	Photographer	Elena Mayard



Photo #: 48 Of 81 Date: 10/24/2022 Time: 10:10 AM
 Description: On the southwestern corner of the facility, I observed several totes of 275 to 300-gallon capacities. The facility representatives stated the totes were storing used oil and oily water. The totes were directly on the ground without adequate containment.

Site	Environmental Response Services, Inc. (ERS)	Location:	8583 Joe Ledoux Road		
City:	Lake Charles	Parish:	Calcasieu	Photographer	Elena Mayard



Photo #: 49 Of 81 Date: 10/24/2022 Time: 10:11 AM
 Description: Another angle of used oil and oily water totes. These totes were not labeled adequately.

Site	Environmental Response Services, Inc. (ERS)	Location:	8583 Joe Ledoux Road		
City:	Lake Charles	Parish:	Calcasieu	Photographer	Elena Mayard



Photo #: 50 Of 81 Date: 10/24/2022 Time: 10:11 AM
 Description: More used oil storage areas at the facility. The totes were not adequately labeled.

Site	Environmental Response Services, Inc. (ERS)	Location:	8583 Joe Ledoux Road		
City:	Lake Charles	Parish:	Calcasieu	Photographer	Elena Mayard



Photo #: 51 Of 81 Date: 10/24/2022 Time: 10:11 AM
 Description: I noted a spill coming from one of these horizontal tanks. The facility representatives stated this was used oil. The tanks were not adequately labeled.

Site	Environmental Response Services, Inc. (ERS)	Location:	8583 Joe Ledoux Road		
City:	Lake Charles	Parish:	Calcasieu	Photographer	Elena Mayard



Photo #: 52 Of 81 Date: 10/24/2022 Time: 10:11 AM
 Description: The facility has applied absorbent pads to the impacted area as an attempt to mitigate the release. The absorbent pads were left there and the spill was not cleaned up.

Site	Environmental Response Services, Inc. (ERS)	Location:	8583 Joe Ledoux Road		
City:	Lake Charles	Parish:	Calcasieu	Photographer	Elena Mayard



10/24/2022 10:12

Photo #: 53 Of 81 Date: 10/24/2022 Time: 10:12 AM
Description: Used oil spill that was not cleaned by the facility.

Site	Environmental Response Services, Inc. (ERS)	Location:	8583 Joe Ledoux Road		
City:	Lake Charles	Parish:	Calcasieu	Photographer	Elena Mayard



10/27/2022 10:05

Photo #: 54 Of 81 Date: 10/27/2022 Time: 10:05 AM
Description: Opposite side of the tanks where the used oil spill was noted. The spill had migrated into the grass on the west side of the facility. The facility representatives applied absorbent pads and they were left there for some time.

Site	Environmental Response Services, Inc. (ERS)	Location:	8583 Joe Ledoux Road		
City:	Lake Charles	Parish:	Calcasieu	Photographer	Elena Mayard



Photo #: 55 Of 81 Date: 10/24/2022 Time: 10:14 AM
 Description: According to Mr. Clark, the several drums observed here contain high-temperature grease from a rig operated by Noble Drilling. The drums are severely corroded.

Site	Environmental Response Services, Inc. (ERS)	Location:	8583 Joe Ledoux Road		
City:	Lake Charles	Parish:	Calcasieu	Photographer	Elena Mayard



Photo #: 56 Of Date: 10/27/2022 Time: 10:13 AM
 Description: Drum of high-temperature grease that had a rusted lid.

Site	Environmental Response Services, Inc. (ERS)	Location:	8583 Joe Ledoux Road		
City:	Lake Charles	Parish:	Calcasieu	Photographer	Elena Mayard



Photo #: 57 Of 81 Date: 10/24/2022 Time: 10:12 AM
Description: I observed several 5-gallon to 55-gallon containers, and one 275-gallon tote that stored used cooking oils, according to the facility. I also observed evidence of leaking containers and spills of this cooking oil.

Site	Environmental Response Services, Inc. (ERS)	Location:	8583 Joe Ledoux Road		
City:	Lake Charles	Parish:	Calcasieu	Photographer	Elena Mayard



Photo #: 58 Of 81 Date: 10/24/2022 Time: 10:13 AM
Description: Several 5-gallon to 55-gallon containers, and one 275-gallon tote that stored used cooking oils.

Site	Environmental Response Services, Inc. (ERS)	Location:	8583 Joe Ledoux Road		
City:	Lake Charles	Parish:	Calcasieu	Photographer	Elena Mayard



Photo #: 59 Of 81 Date: 10/27/2022 Time: 10:09 AM
 Description: I observed leaking containers of used cooking oil.

Site	Environmental Response Services, Inc. (ERS)	Location:	8583 Joe Ledoux Road		
City:	Lake Charles	Parish:	Calcasieu	Photographer	Elena Mayard



Photo #: 60 Of 81 Date: 10/27/2022 Time: 10:07 AM
 Description: Used cooking oil spill in which the facility attempted to mitigate the spill.

Site	Environmental Response Services, Inc. (ERS)	Location:	8583 Joe Ledoux Road		
City:	Lake Charles	Parish:	Calcasieu	Photographer	Elena Mayard



Photo #: 61 Of 81 Date: 10/27/2022 Time: 9:41 AM
 Description: Several used oil drums in which some were stored on a concrete pad and others on the earthen ground. Some spillage was noted in this area.

Site	Environmental Response Services, Inc. (ERS)	Location:	8583 Joe Ledoux Road		
City:	Lake Charles	Parish:	Calcasieu	Photographer	Elena Mayard



Photo #: 62 Of 81 Date: 10/27/2022 Time: 9:46 AM
 Description: Evidence of a spill coming from a roll-off container that was storing crushed drums.

Site	Environmental Response Services, Inc. (ERS)	Location:	8583 Joe Ledoux Road		
City:	Lake Charles	Parish:	Calcasieu	Photographer	Elena Mayard



Photo #: 63 Of 81 Date: 10/27/2022 Time: 9:49 AM
 Description: Drum of used oil that was leaking. The drum was in deteriorated and rusty condition.

Site	Environmental Response Services, Inc. (ERS)	Location:	8583 Joe Ledoux Road		
City:	Lake Charles	Parish:	Calcasieu	Photographer	Elena Mayard



Photo #: 64 Of 81 Date: 10/27/2022 Time: 9:49 AM
 Description: Angle of the top of the leaking drum in Photograph 63.

Site	Environmental Response Services, Inc. (ERS)	Location:	8583 Joe Ledoux Road		
City:	Lake Charles	Parish:	Calcasieu	Photographer	Elena Mayard



Photo #: 65 Of 81 Date: 10/27/2022 Time: 9:42 AM

Description: Drum of hazardous waste picked up from a facility on 10/18/2022. The drum contained a “flashy material,” according to the tag.

Site	Environmental Response Services, Inc. (ERS)	Location:	8583 Joe Ledoux Road		
City:	Lake Charles	Parish:	Calcasieu	Photographer	Elena Mayard

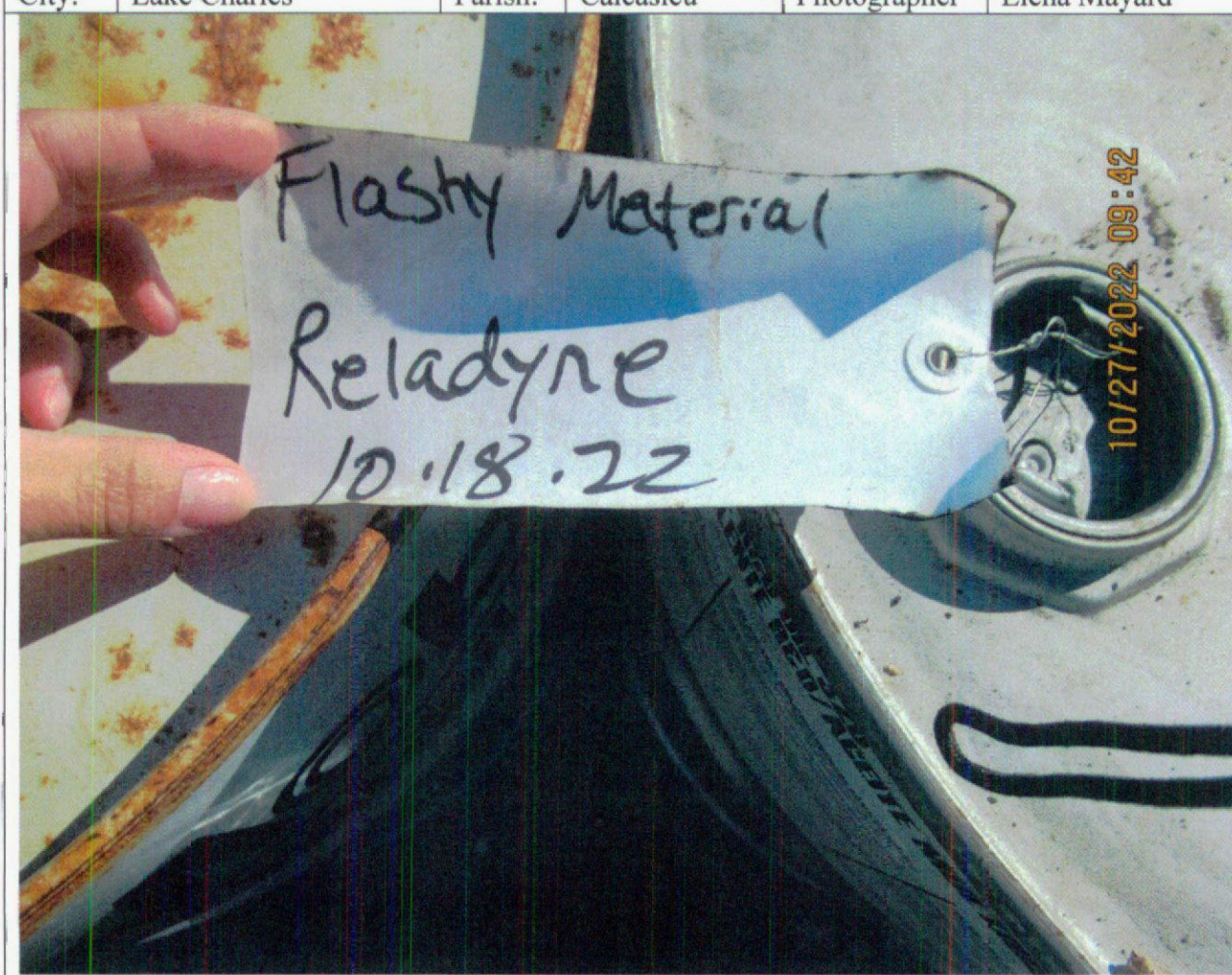


Photo #: 66 Of 81 Date: 10/27/2022 Time: 9:42 AM

Description: Tag of the drum in Photograph 65.

Site	Environmental Response Services, Inc. (ERS)	Location:	8583 Joe Ledoux Road		
City:	Lake Charles	Parish:	Calcasieu	Photographer	Elena Mayard



Photo #: 67 Of 81 Date: 10/27/2022 Time: 9:49 AM
 Description: Drum of paint cans that is not labeled to distinguish if it is hazardous or non-hazardous waste.

Site	Environmental Response Services, Inc. (ERS)	Location:	8583 Joe Ledoux Road		
City:	Lake Charles	Parish:	Calcasieu	Photographer	Elena Mayard



Photo #: 68 Of 81 Date: 10/27/2022 Time: 9:50 AM
 Description: Drum with a hazardous waste label. The drum is showing signs of rusting. The label was deteriorated; therefore, the contents of the drum could not be identified.

Site	Environmental Response Services, Inc. (ERS)	Location:	8583 Joe Ledoux Road				
City:	Lake Charles	Parish:	Calcasieu	Photographer	Elena Mayard		
							
Photo #:	69	Of	81	Date:	10/27/2022	Time:	9:50 AM
Description: Photograph demonstrating the substantial amount of waste storage at the facility.							

Site	Environmental Response Services, Inc. (ERS)	Location:	8583 Joe Ledoux Road		
City:	Lake Charles	Parish:	Calcasieu	Photographer	Elena Mayard



Photo #:	70	Of	81	Date:	10/27/2022	Time:	10:16 AM
Description: More used oil and oily water storage. Some drums are on the concrete pad, others are directly on earthen ground.							

Site	Environmental Response Services, Inc. (ERS)	Location:	8583 Joe Ledoux Road		
City:	Lake Charles	Parish:	Calcasieu	Photographer	Elena Mayard



10/27/2022 10:25

Photo #: 71 Of 81 Date: 10/27/2022 Time: 10:25 AM

Description: I observed a total of 7 frac tanks and 2 aboveground on the adjacent property to the east. Mr. Clark confirmed that the tanks are storing used oil and oily water. This photograph shows 2 frac tanks and 2 aboveground tanks. The tanks were not adequately labeled. Mr. Clark stated the tanks are not double-walled. The tanks have no secondary containment system.

Site	Environmental Response Services, Inc. (ERS)	Location:	8583 Joe Ledoux Road		
City:	Lake Charles	Parish:	Calcasieu	Photographer	Elena Mayard



10/27/2022 10:25

Photo #: 72 Of 81 Date: 10/27/2022 Time: 10:25 AM

Description: Two additional frac tanks without adequate labels and secondary containment systems.

Site	Environmental Response Services, Inc. (ERS)	Location:	8583 Joe Ledoux Road		
City:	Lake Charles	Parish:	Calcasieu	Photographer	Elena Mayard



Photo #: 73 Of 81 Date: 10/24/2022 Time: 10:18 AM

Description: Two additional frac tanks without adequate labels and secondary containment systems.

Site	Environmental Response Services, Inc. (ERS)	Location:	8583 Joe Ledoux Road		
City:	Lake Charles	Parish:	Calcasieu	Photographer	Elena Mayard



Photo #: 74 Of 81 Date: 10/27/2022 Time: 10:23 AM

Description: 7th frac tank at the facility storing used oil. The tank was not adequately labeled and did not have a secondary containment system.



Photo #: 75 Of 81 Date: 10/27/2022 Time: 10:26 AM
Description: seven additional drums that were observed on the adjacent property. The labels indicate it was waste paint, but there was no indication if the waste was hazardous or non-hazardous.

Site	Environmental Response Services, Inc. (ERS)	Location:	8583 Joe Ledoux Road		
City:	Lake Charles	Parish:	Calcasieu	Photographer	Elena Mayard

CONTAINS HAZARDOUS MATERIALS

THIS SHIPPING ORDER

Carrier: Environmental Resp Sers

Shipper's No: Job # 880196

Carrier's No: _____

TO: Consignee ERS
Street 8583 Joe Ledoux Rd
Destination Lake Charles LA
Route Zip 70605

FROM: Shipper Breaux Petroleum
Street 237 N BARRIOS ST
Origin Lockport LA 70374

Number and Type of Packages	HM	I.D. Number	Description of Articles	Hazard Class	Pkg. Grp.	Total Quantity (most, volume, or activity)	Weight (subject to correction)	Class
4 DRUMS			PAINT WASTE					

Truck: 2 Door + Trailer
Start: 08:00 End: 1600

Remit COD to: _____
Address: _____
City: _____ State: _____ Zip: _____

NOTE: Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property. The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding \$ _____ Per _____

NOTE: Liability Limitation for loss or damage in this shipment may be applicable. See 49 U.S.C. 14706(c)(1)(A) and (B).

SHIPPER: X ERS CARRIER: Deputy
PER: 3-4-22 DATE: 3-4-22

EMERGENCY RESPONSE TELEPHONE NUMBER: _____

PLACARDS REQUIRED

PLACARDS SUPPLIED

DRIVER'S SIGNATURE: _____

COD AMT: \$ _____ COD FEE: ☐ Prepaid ☐ Collect \$ _____

TOTAL CHARGES: \$ _____ FREIGHT CHARGES: ☐ Prepaid ☐ Collect

BY SHIPPER ☐ BY CARRIER ☐

CONTAINS HAZARDOUS MATERIALS

Photo #: 76 Of 81 Date: 10/24/2022 Time: 10:44 AM
Description: Hazardous waste manifest from waste that ERS picked up from Breaux Petroleum and transported back to their facility. The manifest corresponds to the drums pictured in Photographs 13-16. The hazardous has been onsite for greater than the allowable 10 days.

Site	Environmental Response Services, Inc. (ERS)	Location:	8583 Joe Ledoux Road		
City:	Lake Charles	Parish:	Calcasieu	Photographer	Elena Mayard

Order #: 12756
Form Approved: OMB No. 2050-0039

2. Page 1 of 3
3. Emergency Response Phone: 800-451-8346 #15012
4. Manifest Tracking Number: 012361855 FLE

Generator's Site Address (if different than mailing address):
Legacy IDW: 3487

U.S. EPA ID Number: TXD988026720
U.S. EPA ID Number: TXR000080576
U.S. EPA ID Number: TXD982560294

10. Containers: 1
11. Total Quantity: 400
12. Unit Wt./Vol.: P
13. Waste Codes: QUTS209H, D001 D035 U002

10/24/2022 11:38

DESIGNATED FACILITY TO GENERATOR

Photo #: 77 Of 81 Date: 10/24/2022

Time: 11:38 AM

Description: Hazardous waste manifest of paint waste generated by ERS. The manifest is dated 4/9/2019. The waste had D001, D035, and U002 waste codes. The facility has not notified of D035 and U002 waste codes.

Site	Environmental Response Services, Inc. (ERS)	Location:	8583 Joe Ledoux Road		
City:	Lake Charles	Parish:	Calcasieu	Photographer	Elena Mayard

Order #: 12756
Form Approved: OMB No. 2050-0039

2. Page 1 of 3
3. Emergency Response Phone: 800-451-8346 #15012
4. Manifest Tracking Number: 012361855 FLE

Generator's Site Address (if different than mailing address):
Legacy IDW: 3487

U.S. EPA ID Number: TXD988026720
U.S. EPA ID Number: TXR000080576
U.S. EPA ID Number: TXD982560294

10. Containers: 1
11. Total Quantity: 400
12. Unit Wt./Vol.: P
13. Waste Codes: QUTS209H, D001 D035 U002

10/24/2022 11:39

DESIGNATED FACILITY TO GENERATOR

Photo #: 78 Of 81 Date: 10/24/2022

Time: 11:39 AM

Description: Hazardous waste manifest dated 4/9/2019 that has D001, D035, and U002 waste codes. The facility failed to update the waste codes on the HW-1, specifically, D035 and U002 wastes.

Site	Environmental Response Services, Inc. (ERS)	Location:	8583 Joe Ledoux Road		
City:	Lake Charles	Parish:	Calcasieu	Photographer	Elena Mayard

Photo #: 79 Of 81 Date: 10/24/2022 Time: 11:40 AM

Description: Another hazardous waste manifest of paint waste generated by ERS. The manifest is dated 12/31/2018. The waste had D001, D035, and U002 waste codes. The facility has not notified of D035 and U002 waste codes.

Site	Environmental Response Services, Inc. (ERS)	Location:	8583 Joe Ledoux Road		
City:	Lake Charles	Parish:	Calcasieu	Photographer	Elena Mayard

Photo #: 80 Of 81 Date: 10/24/2022 Time: 11:40 AM

Description: Hazardous waste manifest dated 12/31/2018 that has D001, D035, and U002 waste codes. The facility failed to update the waste codes on the HW-1, specifically, D035 and U002 wastes.

Site	Environmental Response Services, Inc. (ERS)	Location:	8583 Joe Ledoux Road		
City:	Lake Charles	Parish:	Calcasieu	Photographer	Elena Mayard
					
Photo #:	81	Of	81	Date:	10/24/2022
			Time:	10:09 AM	
Description: Spill of used cooking oil was observed migrating from this concrete slab onto earthen ground. The facility failed to properly dispose of solid waste.					

AI No.: 29918
Alt. ID No.: LAR000026534

Facility Name: Environmental Response Services
Inspection Date: Oct. 24, 2022 – Oct. 27, 2022

ATTACHMENT 4

Waste Profiles & Analytical Results

(34 Pages)

ENVIRONMENTAL RESPONSE SERVICES, INC.
WASTE PROFILE/ APPROVAL

Generator:

Address:

Contact Name:

Phone:

1) Is the below "Agent/Contractor" acting on behalf of the generator for the profiling and disposal or recycling of the material identified on this profile sheet. YES NO

2. If yes, then the "Agent/Contractor" must provide a letter of agency signed by the generator.

Agent/Contractor:

Address:

Billing Address:

Contact name:

Waste Description:

How was the waste generated?:

Where was the waste generated?

SOLID LIQUID SLUDGE Color: _____ Odor: _____

Waste Composition:

Waste Frequency:

% _____	oil	_____ Drums	_____ Gallons	_____ Yards
% _____	water/ antifreeze	_____ One Time	_____ Monthly	_____ Yearly
% _____	solids			
% _____	debris			
% _____	other			

_____ Did the material come from a virgin fuel/oil storage tanks(s).
 _____ Was this oily waste material used in an engine, transmission, or hydraulic system.
 _____ Did material come from cargo tank or transported cargo.
 _____ Was material used in the electrical repair or electrical transmission industries.
 _____ Has this material been mixed with paints, thinners, solvents, or other hazardous materials.

I Certify as the generator or authorized agent of generator that the above descriptions are true and correct. I further certify that the waste is not listed as a RCRA hazardous waste by the EPA and meets the used oil specification set forth by the Louisiana DEQ or the EPA. I understand that this waste is subject to testing and quality assurance at ERS's facility. Materials unacceptable shall be returned to the generator. The generator understands that if they send hazardous waste, knowingly or unknowingly, the generator is responsible for the disposal and decontamination of all materials and equipment. It is the responsibility of the generator to provide hazardous information.

GENERATOR/ AGENT _____ PRINT _____ DATE _____

S:\WPDocs\1ERS\1ERS_INC2\FORMS\PROFILE APPROVAL.wpd

Approved
Jones Clark

ENVIRONMENTAL RESPONSE SERVICES, INC.
 WASTE PROFILE/ APPROVAL

Generator: ESTES - DGRM - LITTLE ROCK TERMINAL (LRK) #56
 Address: 8205 ZEMER RD. LITTLE ROCK AR
 Contact Name: DEBORAH
 Phone: 337-781-8621
#154392

- 1) Is the below "Agent/Contractor" acting on behalf of the generator for the profiling and disposal or recycling of the material identified on this profile sheet. YES NO
 2. If yes, then the "Agent/Contractor" must provide a letter of agency signed by the generator.

Agent/Contractor: MILLER ENVIRONMENTAL
 Address: 2208 INDUSTRIAL DR. SULPHUR LA
 Billing Address: SAME
 Contact name: JEFF GULLY

Waste Description: 55 GALLON Poly with TRUCK PARTS (BIO HAZARD)
BUT NO BLOOD FOUND
 How was the waste generated?:
TRAFFIC ACCIDENT

Where was the waste generated?

SOLID LIQUID SLUDGE Color: MULTI Odor: N/A

Waste Composition:

% 100 oil
 % water/ antifreeze
 % solids
 % debris
 % other

Waste Frequency:

1 Drums Gallons _____ Yards _____
One Time Monthly _____ Yearly _____

NO
I
I
I

- Did the material come from a virgin fuel/oil storage tanks(s).
 Was this oily waste material used in an engine, transmission, or hydraulic system.
 Did material come from cargo tank or transported cargo.
 Was material used in the electrical repair or electrical transmission industries.
 Has this material been mixed with paints, thinners, solvents, or other hazardous materials.

I Certify as the generator or authorized agent of generator that the above descriptions are true and correct. I further certify that the waste is not listed as a RCRA hazardous waste by the EPA and meets the used oil specification set forth by the Louisiana DEQ or the EPA. I understand that this waste is subject to testing and quality assurance at ERS's facility. Materials unacceptable shall be returned to the generator. The generator understands that if they send hazardous waste, knowingly or unknowingly, the generator is responsible for the disposal and decontamination of all materials and equipment. It is the responsibility of the generator to provide hazardous information.

GENERATOR/ AGENT JEFF GULLY PRINT JEFF GULLY DATE 6/24/2022

S:\WPDOcs\1ERS\1ERS_INC2\FORMS\PROFILE APPROVAL.wpd



Generator Information

Company Phone
 Contact/Title Fax
 Site Address
 Manifest Mailing Address
 EPA ID 24-Hr. Emergency Number State ID

Invoicing Information

Company Phone
 Contact/Title Fax
 Site Address
 EPA ID Tax ID PO Number Other ID

Transporter Information

Company Phone EPA ID

Generator Waste Information

Waste Name SIC Code
 Process Generating Waste
 (or check one of the following)
 Spent ☐ Cleaning ☐ Degreasing ☐ Line/Equipment Flush ☐ Aerosols ☐ Off-spec-Intermediate Product ☐
 Spill-Residue ☐ Discarded Product ☐ Empty Containers ☐ Lab Pack ☐
 Form Code Management Method Code Source Code
 Estimated Quantity Type/Size Frequency Other

Physical Properties

State @ 70F Other Layers
 % Liquid % Solid Specific Gravity Exact Odor
 Highest/Lowest pH of any Layer Exact Pumpable Visc.
 Flash Point (F) BTU/LB Exact % Halogen Exact
 Color/Appearance

Chemical Composition

Constituent Description	Range (_ - %)	Average	% or PPM	CAS Number
Solvents Including: Acetone, Ethyl Acetate, EthylBenzene MEK,	10-99			
Methyl Isobutyl Ketone, N-Butyl Alcohol, Naphtha, Petroleum				
Distillates, Non Halogenated Paint Thinners, Toluene, Xylene				
Oil Based Paint Liquids with Pigments	1-90			
Oil Based Paint Sludge with Pigments	0-20			
Oil Based Paint Solids with Pigments	0-10			



Metals

Metal Analysis Type

		Actual	Low	High			Actual	Low	High			Actual	Low	High
Antimony	Sb				Chromium VI	Cr (D007)				Nickel	Ni			
Arsenic	As (D004)				Cobalt	Co				Selenium	Se (D010)			
Barium	Ba (D005)				Copper	Cu				Silver	Ag (D011)			
Beryllium	Be				Lead	Pb (D008)				Thallium	Tl			
Cadmium	Cd (D006)				Mercury	Hg (D009)				Vanadium	V			
Chromium III	Cr (D007)				Molybdenum	Mo				Zinc	Zn			

Other Properties

- | | | | |
|---|--|--|---|
| ☐ Lab Pack - Assorted | ☐ Pesticide | ☐ Explosive / Shock Sensitive | ☐ Medical / Infectious |
| ☐ DOT Corrosive Only | ☐ <20% VOC | ☐ Non-Friable Asbestos | ☐ Radioactive |
| ☐ Oxidizer | ☐ Reactive Cyanide | ☐ Friable Asbestos | ☐ PCB containing |
| ☐ Organic Peroxide | ☐ Reactive Sulfide | ☐ Benzene NESHAP | ☐ Dioxin Containing |
| ☐ Polymeric Resin | ☐ Flammable Solid | ☐ Ozone Depleting | ☐ Debris per 268.2 |
| ☐ OSHA Carcinogen | ☐ Dangerous When Wet | ☐ Ammonia Containing | ☐ RCRA Wastewater |
| ☐ Acutely Hazardous (P code) | ☐ Spontaneously Combustible | ☐ Highly Odorous | ☐ TCLP Organic |
| ☐ CA Extremely Hazardous | ☐ Water / Air Reactive | ☐ Compressed Gas | |

Shipping Information

Shipping Name UN1263, PAINT RELATED MATERIAL, 3, PG II, UNIVERSAL WASTE-PAINT

Technical n.o.s. or NON-RCRA Name UNIVERSAL WASTE PAINT

Hazard Class 3 UN / NA UN1263 PG II Texas Waste Code UNIV219H

EPA Waste Code(s)

Lowest RQ Constituent

☐ Poison
☐ Poison Inhalation Hazard
☐ Dangerous When Wet
☐ Special Hazard
☐ Ozone Depleting Label
☐ DOT

Primary Label Sub Label Wastewater ERG #

Special Handling Instructions

Certification

I hereby certify and warrant that the information supplied on this form and on any attachments and/or supplements represents a complete and accurate identification and description of this waste, its constituents, and its known and/or suspected hazards. I further certify and warrant that this information is the result of a characterization (using detailed generator knowledge and/or analytical information) in accordance with the procedures of the federal, state, and local agencies. I further certify and warrant that as the generator, it is my ongoing responsibility to notify receiving facility of any significant process changes that could affect this waste profile.

Authorized Generator Signature *Neil Clark*

Print Name/Title Neil Clark Date 11-19-21

Attachments MSDS Lab Analysis Other

Certification Based on: ☒ Process Knowledge ☐ Analysis (Please Attach)



Generator Information

Company Phone
 Contact/Title Fax
 Site Address
 Manifest Mailing Address
 EPA ID 24-Hr. Emergency Number State ID

Invoicing Information

Company Phone
 Contact/Title Fax
 Site Address
 EPA ID Tax ID PO Number Other ID

Transporter Information

Company Phone EPA ID

Generator Waste Information

Waste Name SIC Code
 Process Generating Waste
 (or check one of the following)
 Spent ☐ Cleaning ☐ Degreasing ☐ Line/Equipment Flush ☐ Aerosols ☐ Off-spec-Intermediate Product ☐
 Spill-Residue ☐ Discarded Product ☐ Empty Containers ☐ Lab Pack ☐
 Form Code Management Method Code Source Code
 Estimated Quantity Type/Size Frequency Other

Physical Properties

State @ 70F Other Layers
 % Liquid % Solid Specific Gravity Exact Odor
 Highest/Lowest pH of any Layer Exact Pumpable Visc.
 Flash Point (F) BTU/LB Exact % Halogen Exact
 Color/Appearance

Chemical Composition

Constituent Description	Range (_-%)	Average	% or PPM	CAS Number
Solvents Including: Acetone, Ethyl Acetate, EthylBenzene MEK,	10-99			
Methyl Isobutyl Ketone, N-Butyl Alcohol, Naphtha, Petroleum				
Distillates, Non Halogenated Paint Thinners, Toluene, Xylene				
Oil Based Paint Liquids with Pigments	1-90			
Oil Based Paint Sludge with Pigments	0-20			
Oil Based Paint Solids with Pigments	0-10			



Metals

Metal Analysis Type SEE SDSs

		Actual	Low	High			Actual	Low	High			Actual	Low	High
Antimony	Sb				Chromium VI	Cr (D007)				Nickel	Ni			
Arsenic	As (D004)				Cobalt	Co				Selenium	Se (D010)			
Barium	Ba (D005)				Copper	Cu				Silver	Ag (D011)			
Beryllium	Be				Lead	Pb (D008)				Thallium	Tl			
Cadmium	Cd (D006)				Mercury	Hg (D009)				Vanadium	V			
Chromium III	Cr (D007)				Molybdenum	Mo				Zinc	Zn			

Other Properties

- | | | | |
|---|--|--|---|
| ☐ Lab Pack - Assorted | ☐ Pesticide | ☐ Explosive / Shock Sensitive | ☐ Medical / Infectious |
| ☐ DOT Corrosive Only | ☐ <20% VOC | ☐ Non-Friable Asbestos | ☐ Radioactive |
| ☐ Oxidizer | ☐ Reactive Cyanide | ☐ Friable Asbestos | ☐ PCB containing |
| ☐ Organic Peroxide | ☐ Reactive Sulfide | ☐ Benzene NESHA | ☐ Dioxin Containing |
| ☐ Polymeric Resin | ☐ Flammable Solid | ☐ Ozone Depleting | ☐ Debris per 268.2 |
| ☐ OSHA Carcinogen | ☐ Dangerous When Wet | ☐ Ammonia Containing | ☐ RCRA Wastewater |
| ☐ Acutely Hazardous (P code) | ☐ Spontaneously Combustible | ☐ Highly Odorous | ☐ TCLP Organic |
| ☐ CA Extremely Hazardous | ☐ Water / Air Reactive | ☐ Compressed Gas | |

Shipping Information

Shipping Name UN1263, PAINT RELATED MATERIAL, 3, PG II, UNIVERSAL WASTE-PAINTTechnical n.o.s. or NON-RCRA Name UNIVERSAL WASTE PAINTHazard Class 3 UN / NA UN1263 PG II Texas Waste Code UNIV219HEPA Waste Code(s) Lowest RQ Constituent
☐ Poison
 ☐ Poison Inhalation Hazard
 ☐ Dangerous When Wet
 ☐ Special Hazard
 ☐ Ozone Depleting Label
 ☐ DOT
Primary Label Sub Label Wastewater ERG # Special Handling Instructions

Certification

I hereby certify and warrant that the information supplied on this form and on any attachments and/or supplements represents a complete and accurate identification and description of this waste, its constituents, and its known and/or suspected hazards. I further certify and warrant that this information is the result of a characterization (using detailed generator knowledge and/or analytical information) in accordance with the procedures of the federal, state, and local agencies. I further certify and warrant that as the generator, it is my ongoing responsibility to notify receiving facility of any significant process changes that could affect this waste profile.

Authorized Generator Signature Neil ClarkPrint Name/Title Neil ClarkDate 11-12-21Attachments MSDS See 8 SDSsLab Analysis Other

Certification Based on:



Process Knowledge



Analysis (Please Attach)



EZ Profile™

Requested Facility: CWM Lake Charles☐ Unsure Profile Number: 961379LA☐ Multiple Generator Locations (Attach Locations) ☐ Request Certificate of Disposal ☐ Renewal? Original Profile Number: _____**A. GENERATOR INFORMATION (MATERIAL ORIGIN)**

1. Generator Name: ENVIRONMENTAL RESPONSE SERVICES
2. Site Address: 8583 JOE LEDOUX RD.
(City, State, ZIP) LAKE CHARLES LA 70605
3. County: _____
4. Contact Name: B. RENE DILLON
5. Email: rene@ers-nbc.com
6. Phone: (337) 562-0001 7. Fax: (337) 562-0002
8. Generator EPA ID: LAR000026534 ☐ N/A
9. State ID: _____ ☒ N/A

C. MATERIAL INFORMATION

1. Common Name: RCRA EMPTY CONTAINERS
Describe Process Generating Material: ☐ See Attached
DISPOSING OF EMPTY CONTAINERS LAST CONTAINING NON HAZ TRACER DYE
2. Material Composition and Contaminants: ☐ See Attached
- | 1. RCRA EMPTY CONTAINER | 100-100 % |
|-------------------------|-----------|
| 2. | |
| 3. | |
| 4. | |
- Total composition must be equal to or greater than 100% ☒ ≥100%
3. State Waste Codes: _____ ☒ N/A
4. Color: VARIES
5. Physical State at 70°F: ☒ Solid ☐ Liquid ☐ Other: _____
6. Free Liquid Range Percentage: _____ to _____ ☒ N/A
7. pH: _____ to _____ ☒ N/A
8. Strong Odor: ☐ Yes ☒ No Describe: _____
9. Flash Point: ☐ <140°F ☐ 140°-199°F ☒ ≥200° ☐ N/A

E. ANALYTICAL AND OTHER REPRESENTATIVE INFORMATION

1. Analytical attached ☐ Yes
Please identify applicable samples and/or lab reports:
2. Other information attached (such as MSDS)? ☒ Yes

G. GENERATOR CERTIFICATION (PLEASE READ AND CERTIFY BY SIGNATURE)

By signing this EZ Profile™ form, I hereby certify that all information submitted in this and all attached documents contain true and accurate descriptions of this material, and that all relevant information necessary for proper material characterization and to identify known and suspected hazards has been provided. Any analytical data attached was derived from a sample that is representative as defined in 40 CFR 261 - Appendix 1 or by using an equivalent method. All changes occurring in the character of the material (i.e., changes in the process or new analytical) will be identified by the Generator and be disclosed to Waste Management prior to providing the material to Waste Management.

If I am an agent signing on behalf of the Generator, I have confirmed with the Generator that information contained in this Profile is accurate and complete.

Name (Print): B. RENE DILLON Date: 04/14/2015Title: TECHNICAL WASTE MANAGERCompany: ENVIRONMENTAL RESPONSE SERVICES**B. BILLING INFORMATION**☒ SAME AS GENERATOR

1. Billing Name: ENVIRONMENTAL RESPONSE SERVICES
2. Billing Address: 8583 JOE LEDOUX RD.
(City, State, ZIP) LAKE CHARLES LA 70605
3. Contact Name: B. RENE DILLON
4. Email: rene@ers-nbc.com
5. Phone: (337) 562-0001 6. Fax: (337) 562-0002
7. WM Hauled? ☐ Yes ☐ No
8. P.O. Number: _____
9. Payment Method: ☐ Credit Account ☐ Cash ☐ Credit Card

D. REGULATORY INFORMATION

1. EPA Hazardous Waste? ☐ Yes* ☒ No
Code: _____
2. State Hazardous Waste? ☐ Yes ☒ No
Code: _____
3. Is this material non-hazardous due to Treatment, Delisting, or an Exclusion? ☐ Yes* ☒ No
4. Contains Underlying Hazardous Constituents? ☐ Yes* ☒ No
5. From an industry regulated under Benzene NESHAP? ☐ Yes* ☒ No
6. Facility remediation subject to 40 CFR 63 GGGGG? ☐ Yes* ☒ No
7. CERCLA or State-mandated clean-up? ☐ Yes* ☒ No
8. NRC or State-regulated radioactive or NORM waste? ☐ Yes* ☒ No
***If Yes, see Addendum (page 2) for additional questions and space.**
9. Contains PCBs? → If Yes, answer a, b and c. ☐ Yes ☒ No
a. Regulated by 40 CFR 761? ☐ Yes ☐ No
b. Remediation under 40 CFR 761.61 (a)? ☐ Yes ☐ No
c. Were PCB imported into the US? ☐ Yes ☐ No
10. Regulated and/or Untreated Medical/Infectious Waste? ☐ Yes ☒ No
11. Contains Asbestos? ☐ Yes ☒ No
→ If Yes: ☐ Non-Friable ☐ Non-Friable - Regulated ☐ Friable

F. SHIPPING AND DOT INFORMATION

1. ☐ One-Time Event ☒ Repeat Event/Ongoing Business
2. Estimated Quantity/Unit of Measure: 5
☐ Tons ☒ Yards ☐ Drums ☐ Gallons ☐ Other: _____
3. Container Type and Size: CYD BAGS
4. USDOT Proper Shipping Name: _____ ☒ N/A

Certification Signature

THINK GREEN.®

QUESTIONS? CALL 800 963 4776 FOR ASSISTANCE

Revised September 12, 2014
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Profile #: 0124203008BH

WASTE/MATERIAL PROFILE FORM

EQAI ID: 630704

Note: Standard templates may be available online for various common waste streams, Universal Waste, Recyclable Goods, and Lab Packs. To see a list of templates click [HERE](#).

A. GENERATOR/CUSTOMER INFORMATION (If foreign generator, complete Waste Import Supplement)			
1. Generator: Environmental Response Services		☒ Invoicing information is the same as generator mailing address	
2. Site Address: 8583 Joe LeDoux Road		☐ P.O. required for payment? If yes, include: _____	
City: Lake Charles	Phone: 337-562-0001	8. Invoicing Company: Environmental Response Services	
State: LA	Zip: 70605	Country: USA	
3. Mailing Address: PO Box 4288		9. Invoicing Address: PO Box 4288	
City: Lake Charles		City: Lake Charles	
State: LA	Zip: 70605	State: LA	Zip: 70605
	Country: USA		Country: USA
4. Technical Contact: Neil Clark		10. Customer Contact: Neil Clark or Forrest Chapel	
5. Phone: 337-562-0001	Email: Neil.c@ers-nbc.com	11. Phone: 337-562-0001 Email: ops@ers-nbc.com	
6. Generator Status: ☐ SQG ☐ LQG ☐ VSQG/CESQG (If yes, complete Certification Supplement) ☐ Not Applicable			
7. EPA ID #: NA		NAICS CODE: 562219	State ID #: (If applicable) D0022
B. WASTE/MATERIAL STREAM (For assistance completing this document, click HERE)			
1. Common Name: Waste Water & Bottoms			
(Please provide a site history for Remediation & IDW sites. Use additional form if necessary.)			
2. Generating Process: through the collection of oily water and solids (grit) from cleaning oil tanks, sumps, etc.			
3. Source Code: _____		Form Code: _____	
C. SHIPPING/PACKAGING INFORMATION			
1. DOT Hazardous Materials? ☐ Yes ☒ No Proper Shipping Name: Non-RCRA and Non-DOT Regulated Material			
2. Additional Description: (49 CFR 172.203, e.g. "Lead" or "D008") Waste Water and Bottoms			
3. RQ: ☐ Yes ☒ No RQ Reason: _____		RQ Threshold: _____	UN/NA #: _____
Packing Group: _____	ERG #: _____	Hazard Class: Select #1 _____ Select #2 _____ Select #3 _____	
4. DOT Special Permit? ☐ Yes ☒ No Permit #: _____			
5. 24-Hour Emergency Phone: 337-562-0001		6. DOT Inhalation Hazard? ☐ Yes ☒ No	
7. Container Type: ☒ Bulk ☐ Totes ☐ Pallet ☐ Boxes ☐ Drums ☐ Cylinder ☐ Lab Pack (If 40 CFR 264.316/49CFR 173.12(b) Lab Pack Inventory lists required)			
Combination Containers (e.g., inner containers), Describe: _____			
☐ Other, Describe: _____			
8. Volume/Frequency: Volume: 30,000		Units: gallons	
Frequency: ☒ Year ☐ Quarterly ☐ Monthly ☐ 1 Time ☐ Other, Describe: _____			
D. PHYSICAL PROPERTIES (Use additional form if necessary)			
1. Physical Description (e.g. soil, water, PPE, debris, sorbent, etc. Include 100% of container content. If debris, provide dimensions & weight.)			
Description		Typical (%)	Min (%)
Oil/Grease			0
Water			70
Processable Solids			2
			10
			100
			30
2. Odor: ☐ None ☒ Slight ☐ Strong		Odor Type: ☐ Ammonia ☐ Amines ☐ Mercaptans ☐ Sulphur	
		☐ Organic Acid ☒ Other, Describe: anaerobic or septic-like	
3. Physical State: (at 70°F) ☐ Solid ☐ Dust/Powder ☐ Debris ☐ Sludge/Slurry ☒ Liquid ☐ Gas/Aerosol ☐ Varies			
4. Color: LIGHT GREEN BROWN		5. Liquid phases: ☒ Single ☐ Double Layer ☐ Multi-layer ☐ N/A	
6. Is it solid using the paint filter test? (40 CFR Part 264.314(b)) ☐ Yes (Solid) ☒ No (Not Solid)			
Is there a possibility of incidental liquids from transportation? ☐ Yes ☒ No			
7. pH: (If solid, provide estimated pH if mixed 50:50 with water) ☐ ≤ 2 ☒ 2.1 - 4.9 ☒ 5 - 10 ☒ 10.1 - 12.4 ☐ ≥ 12.5			
8. Flash Point: _____ °F and/or ☐ < 90°F ☐ 90 - 139°F ☐ 140 - 199°F ☒ > 200°F ☐ Does Not Flash ☐ Flammable Solid			
BTU/lb. Value: _____ and/or ☒ < 5000 BTU ☐ ≥ 5000 BTU			
9. Are there any known handling/treatment issues involving this material? ☐ Yes ☒ No If yes, Describe: _____			

E. CHARACTERIZATION & CHEMICAL COMPOSITION (Use additional form if necessary)								
1. US Ecology Texas Customers - Waste/Material Type: ☒ Industrial ☐ Non-Industrial ☐ N/A TX State Code: OUTS6951 Pennsylvania Residual Waste: ☐ Yes ☒ No PA State Code(s): 								
2. State Waste Codes:		☐ None D0022 						
3. RCRA Waste Codes:		☒ None 						
If None, is it exempt from the definition of "Solid Waste" or "Hazardous Waste"? ☐ Yes ☒ No If yes, list reference from 40 CFR Part 261.2, 3, or 4: 								
4. If F006-F009, F012, or F019, are Cyanides used in the process? ☐ Yes ☒ No (If yes, Total and Amenable CN (9010/9012) analysis required)								
5. Knowledge is from: ☒ Lab analysis (requires attachment) ☐ SDS/MSDS (requires attachment) ☒ Process/generator knowledge								
6. Chemical Composition (include all applicable UHC's TRI Section 313 chemicals, OSHA Hazardous Materials, etc.)								
Constituent	Units	TCLP	Totals	Typical	Min	Max	UHC	Exceeds LDR
	Select	☐	☐				☐	☐
	Select	☐	☐				☐	☐
	Select	☐	☐				☐	☐
	Select	☐	☐				☐	☐
	Select	☐	☐				☐	☐
	Select	☐	☐				☐	☐
	Select	☐	☐				☐	☐
	Select	☐	☐				☐	☐
	Select	☐	☐				☐	☐
F. ADDITIONAL PROPERTIES ☒ None Apply (Through Question F23)								
1. Explosive:		☐ Yes ☒ No		2. Reactive Sulfides:		 ppm		☐ Yes ☒ No
3. Shock Sensitive:		☐ Yes ☒ No		4. Reactive Cyanides:		 ppm		☐ Yes ☒ No
5. Radioactive:		☐ Yes ☒ No		6. Reactive Other:				☐ Yes ☒ No
(If yes, complete Radioactive Waste Acceptance Supplement)				Describe:				
7. Medical/Infectious/Biohazard Waste:		☐ Yes ☒ No		8. Polychlorinated Biphenyls (PCB):		☐ Yes ☒ No		
				(If yes, complete PCB Supplement)				
9. Dioxins and/or Furans:		☐ Yes ☒ No		10. Metal Fines/Powder/Paste:		☐ Yes ☒ No		
				(Including Aluminum)				
11. Pyrophoric:		☐ Yes ☒ No		12. Temperature Controlled:		☐ Yes ☒ No		
				(For Transportation Only)				
13. Thermally Unstable:		☐ Yes ☒ No		14. Biodegradable Sorbents:		☐ Yes ☒ No		
15. Compressed Gas:		☐ Yes ☒ No		16. Used Oil: (per 40 CFR Part 279)		☐ Yes ☒ No		
(If yes, complete Compressed Gas Cylinder Supplement)				(If yes, complete Used Oil Supplement)				
17. Oxidizer: (List in Section E6)		☐ Yes ☒ No		18. Tires: (If yes, must be quartered for landfill)		☐ Yes ☒ No		
19. Organic Peroxide:		☐ Yes ☒ No		20. Beryllium:		☐ Yes ☒ No		
21. Asbestos:		☐ Yes ☒ No		If Yes: ☐ Non Friable ☐ Friable		(If friable, material must be packaged per 40 CFR Part 61.150)		
22. Ammonia/Ammonia Compounds:						☐ Yes ☒ No		
23. Hazardous Secondary Material: (Per 40 CFR Part 260.10)						☐ Yes ☒ No		
If yes, I certify that this waste/material meets all requirements of legitimate recycling of Hazardous Secondary Materials under 40 CFR Part 260.43 and/or I am complying with the conditions for generators using one verified recycler exclusion.								
24. Are pharmaceutical wastes profiled under this approval subject to a prescription?						☐ Yes ☐ No ☒ N/A		
(If yes, complete Pharmaceutical Certification Supplement)								

G. REGULATORY INFORMATION

1. Volatile Organic Concentration: (Per 40 CFR Part 264.1083 & 265.1084) ☒ <500 ppmw ☐ ≥500 ppmw
2. Has the material been treated after the initial point of generation? ☐ Yes ☒ No If yes, Describe: _____
3. If RCRA Hazardous:
- ☐ Wastewater WW=<1% TSS & TOC; 40 CFR Part 268.2
 - ☐ Non-wastewater TSS/TOC>WW
 - ☐ Alternative Treatment Standards for soil > 50% soil; 40 CFR Part 268.49
 - ☐ Alternative Treatment Standards for debris 40 CFR Part 268.2(g) & (h); >50% of waste is >2.5 inch size
 - ☐ I confirm debris cannot reasonably be separated from non-debris by simple physical or mechanical means.
 - ☐ I confirm debris has not been mixed/diluted with non-debris as prohibited in 40 CFR Part 268.3.
 - ☐ Waste meets LDR Treatment Standards
4. Treatment subcategory: (if applicable) _____
5. Is the site or waste/material, subject to NESHAP/MACT standard(s)? ☐ Yes ☒ No
If yes, Please choose the applicable Part: ☐ 61 ☐ 62 ☐ 63 Subpart _____ of NESHAP/MACT standards ☐ N/A
6. Is the waste/material RCRA Hazardous containing Benzene and originating at a petroleum refinery (SIC 2911), chemical manufacturing plant (SIC 2800 thru 2899) or Coke by-product recovery plant (SIC 3312)?
☐ Yes ☒ No (If yes, complete the Benzene Waste Operations Supplement and if applicable the Thermal Supplement.)

H. GENERATOR'S CERTIFICATION

1. Is a specific facility or treatment technology requested? ☒ Yes ☐ No
2. Requested Technology: Deepwell Injection - H134
3. Thermal processing: ☐ Yes ☒ No (If yes, complete Thermal Supplement)
4. Other specific restrictions requested: None
5. Requested US Ecology Facility: Winnie, TX
(If US Ecology Chicago, complete Illinois Disposal Supplement)

I certify that all information (including attachments) is complete, factual and is an accurate representation of the known and suspected hazards pertaining to waste/material described herein. I authorize US Ecology's personnel to add supplemental information to the Waste/Material Profile Form, provided I am contacted and grant permission to do so. US Ecology may require re-submittal of the Waste/Material Profile Form if substantial changes are determined necessary. I authorize US Ecology's personnel to obtain a sample from any waste/material shipment for purposes of verification and confirmation and understand that waste/material that does not conform to specifications described in this Waste/Material Profile Form may be rejected by US Ecology. I certify that I am familiar with the waste/material described herein through analysis and/or process knowledge and that all information is true, accurate, representative and complete and that this Waste/Material Profile Form was completed in accordance with the instructions provided.

If I am an agent acting on behalf of the generator, I also certify that I have permission to sign any and all waste/material characterization paperwork on the generator's behalf and that I can produce such certification in writing upon request.

Print Name: NEIL CLARK

Signature: kathryn.horton@us
ecology.com

Digitally signed by kathryn.horton@usecology.com
DN: CN=kathryn.horton@usecology.com
Reason: Merge Docs on behalf of Neil Clark with ERS
Location: your signing location here
Date: 2021-03-22 13:05:40
File: PhasemPDF Version: 13.0.0

Title: PRESIDENT, GENERAL MANAGER

Company: Environmental Response Services

Date: 03/22/2021

Renewal Profile: 0124203008BH
EQAI ID: 630704
Approval Date: 3/22/2021
Recert Date: 3/22/2022
Expiration Date: 3/22/2023

APPROVED

Kathryn Horton, 3/22/2021, 12:51:22 PM


WASTE/MATERIAL PROFILE FORM

Generator Knowledge Supplement

EQAI ID: 630704

Profile #: **0124203008BH**

Generator Information	
1. Generator Name: Environmental Response Services, Inc.	
2. Generator State ID: D0022	3. State Waste Code: OUTS6951
4. Specific Gravity: 0.9-1.75	
5. PPE (OSHA or HMSI): OSHA Level D	
TCLP / Total Metals (If yes, analysis is required)	
6. Are there any RCRA regulated metals in the raw material or have RCRA regulated metals been introduced to the process which generates the waste?	☐ Yes ☒ No
TCLP / Total Volatile Organics (If yes, analysis is required)	
7. Are there any RCRA regulated volatile organics in the raw material or have RCRA regulated volatile organics been introduced to the process which generates the waste?	☐ Yes ☒ No
TCLP / Total Semivolatile Organics (If yes, analysis is required)	
8. Are there any RCRA regulated semi-volatile organics in the raw material or have RCRA regulated volatile organics been introduced to the process which generates the waste?	☐ Yes ☒ No
TCLP / Total Herbicides and Pesticides (If yes, analysis is required)	
9. Are there any RCRA regulated herbicides or pesticides in the raw material or have any RCRA regulated herbicides or pesticides been introduced to the process which generates the waste?	☐ Yes ☒ No
Reactivity (If yes, analysis is required)	
10. Are there any RCRA regulated cyanides or sulfides in the raw material or have any RCRA regulated cyanides or sulfides been introduced to the process which generates the waste?	☐ Yes ☒ No
Corrosivity (If yes, analysis is required)	
11. Does the raw material or any materials introduced into the process contain a RCRA regulated pH of ≤ 2 or > 12.5 ?	☐ Yes ☒ No
Ignitability (If yes, analysis is required)	
12. Does the raw material or do any materials introduced into the process contain any constituents that would cause a flashpoint of $< 140^{\circ}\text{F}$?	☐ Yes ☒ No
13. If yes does the material meets Alcohol exemption (40CFR 262.21(a)(1))?	☐ Yes ☐ No
Analytical Comments: Report S21020018 - Sample ID: 2221 Dated 2/22/2021	
Print Name: NEIL CLARK	Signature: kathryn.horton@usecology.com
Title: PRESIDENT, GENERAL MANAGER	Company: Environmental Response Services Inc
Date: 03/22/2021	

CHEMTEX

Environmental & Industrial Hygiene Services

Client: Environmental Response Service
8583 Joe LeDoux Rd.
Lake Charles, LA- 70305

Attn: Mr. Neil Clark
Phone: 337-562-0001; Fax: 337-562-0002
Email: thomas.h@ers-nbc.com

3082 25th Street, Port Arthur, Texas 77642 (409) 983-4575 FAX (409) 982-1522
5544 Leopard Street, Corpus Christi, Texas 78408 (361) 299-9900 FAX (361) 299-1155
138 S. Cities Service Hwy., Sulphur, Louisiana 70663 (337) 626-2121 FAX (337) 626-2126
401 N. 11th Street, La Porte, Texas 77571 (281) 867-9900 FAX (281) 867-1155

Profile: 0124203008BH
EQAI ID: 630704
2021 Renewal Analytical



Reporting Date: 02/22/21
Sample Matrix: Waste Water
Date Collected: 02/02/21
Time Collected: 12:00pm
Collected by: Mike Taylor
Date Received: 02/02/21
Time Received: 07:40pm
CHEMTEX File #: S21020018

RESULTS OF ANALYSIS

Project: USECO/ERS

Site/Location : ERS TANK FARM

TOXICITY CHARACTERISTICS LEACHING PROCEDURE CONSTITUENTS

CHEMTEX ID	Sample ID	Parameter	Units	Results	RL
S21020018	2221	TCLP Metals			
		Arsenic	mg/L or ppm	0.022	0.007
		Barium	mg/L or ppm	0.208	0.002
		Cadmium	mg/L or ppm	<0.002	0.002
		Chromium	mg/L or ppm	<0.012	0.012
		Lead	mg/L or ppm	0.007	0.004
		Selenium	mg/L or ppm	<0.013	0.013
		Silver	mg/L or ppm	<0.006	0.006
		Mercury	mg/L or ppm	<0.0002	0.0002
		TCLP Volatiles			
		Vinyl chloride	mg/L or ppm	<0.0250	0.0250
		1,1-Dichloroethene	mg/L or ppm	<0.0250	0.0250
		2-Butanone	mg/L or ppm	<0.1250	0.1250
		Chloroform	mg/L or ppm	<0.0250	0.0250
		1,2-Dichloroethane	mg/L or ppm	<0.0250	0.0250
		Carbon tetrachloride	mg/L or ppm	<0.0250	0.0250
		Benzene	mg/L or ppm	<0.0250	0.0250
		Trichloroethene	mg/L or ppm	<0.0250	0.0250
		Tetrachloroethene	mg/L or ppm	<0.0250	0.0250
		Chlorobenzene	mg/L or ppm	<0.0250	0.0250
		1,4-Dichlorobenzene	mg/L or ppm	<0.0250	0.0250
		TCLP Semi-Volatiles			
		Pyridine	mg/L or ppm	<0.005	0.005
		1,4-Dichlorobenzene	mg/L or ppm	<0.005	0.005
		2-methylphenol	mg/L or ppm	<0.005	0.005
		4-Methylphenol	mg/L or ppm	<0.005	0.005
		Hexachloroethane	mg/L or ppm	<0.005	0.005
		Nitrobenzene	mg/L or ppm	<0.005	0.005
		Hexachloro 1,3-butadiene	mg/L or ppm	<0.005	0.005
		2,4,6-Trichlorophenol	mg/L or ppm	<0.005	0.005
		2,4,5-Trichlorophenol	mg/L or ppm	<0.005	0.005
		2,4-Dinitrotoluene	mg/L or ppm	<0.005	0.005
		Hexachlorobenzene	mg/L or ppm	<0.005	0.005
		Pentachlorophenol	mg/L or ppm	<0.005	0.005

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Environmental & Industrial Hygiene Services

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 401 N. 11th Street, La Porte, Texas 77571 (281) 867-9900 FAX (281) 867-1155

Client: Environmental Response Service
 8583 Joe LeDoux Rd.
 Lake Charles, LA- 70605

Attn: Mr. Neil Clark
 Phone: 337-562-0001; Fax: 337-562-0002
 Email: thomas.h@ers-nbc.com

Reporting Date: 02/22/21
 Sample Matrix: Waste Water
 Date Collected: 02/02/21
 Time Collected: 12:00pm
 Collected by: Mike Taylor
 Date Received: 02/02/21
 Time Received: 07:40pm
 CHEMTEX File #: S21020018

RESULTS OF ANALYSIS

Project: USECO/ERS
 Site/Location : ERS TANK FARM

CHEMTEX ID	Sample ID	Parameter	Units	Results	RL	Reg Limit
S21020018	2221	Reactive Cyanide	mg/kg or ppm	<5	5	250
		Reactive Sulfide	mg/kg or ppm	<10	10	500
		Ignitability	°F	>200	--	--
		Corrosivity as pH	pH Units	6.05	--	--

RL: Reporting Limit.

Analysis was performed by CHEMTEX, Port Arthur, TX.

Report is generated at CHEMTEX, Port Arthur, TX.

Parameter	Method Reference	Date Analyzed/Analyzed By
TCLP Metals	EPA 1311/200.7	02/05/21 VM
TCLP Mercury	EPA 1311/7470A	02/05/21 NNR
TCLP Volatiles (VOC)	EPA1311/EPA 8260B	02/10/21 KM
TCLP Semi Volatiles	EPA 1311/8270D	02/21/21 KM
Reactive Cyanide	EPA SW 846 7.3.3	02/09/21 SG
Reactive Sulfide	EPA SW 846 7.3.4	02/09/21 SG
Ignitability	EPA 1010A	02/08/21 KM
Corrosivity as pH	EPA 9040D	02/02/21 SG

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 401 N. 11th Street, La Porte, Texas 77571 (281) 867-9900 FAX (281) 867-1155

Client: Environmental Response Service
 8583 Joe LeDoux Rd.
 Lake Charles, LA- 70605

Reporting Date: 02/22/21
 CHEMTEX File #: S21020018

LABORATORY QUALITY CONTROL DATA

		Method Blank (mg/L)					
QC Batch ID	MB ID	Parameter	Result	RL			
		TCLP Metals					
QbMA020521	WW020521MB	Arsenic	<0.007	0.007			
		Barium	<0.002	0.002			
		Cadmium	<0.002	0.002			
		Chromium	<0.012	0.012			
		Lead	<0.004	0.004			
		Selenium	<0.013	0.013			
		Silver	<0.006	0.006			
QbHg020521	020521MB	Mercury	<0.0002	0.0002			
		LCS(mg/L)					
QC Batch ID	LCS ID	Parameter	Spk	LCS	LCS	% Rec	
		TCLP Metals	Added	Result	% Rec	Limit	
QbMA020521	M020521LCS	Arsenic	1.000	0.979	98	80-120	
		Barium	1.000	1.066	107	80-120	
		Cadmium	1.000	0.952	95	80-120	
		Chromium	1.000	1.074	107	80-120	
		Lead	1.000	1.034	103	80-120	
		Selenium	1.000	1.004	100	80-120	
		Silver	1.000	1.009	101	80-120	
		Dup(mg/L)					
QC Batch ID	Dup ID	Parameter	Sample	Sample Dup	RPD	RPD	
		TCLP Metals	Result	Result	%	Limit	
QbMA020521	S21020018 Dup	Arsenic	0.022	0.012	15	20	
		Barium	0.208	0.202	1	20	
		Cadmium	<0.002	<0.002	--	20	
		Chromium	<0.012	<0.012	--	20	
		Lead	0.007	0.007	1	20	
		Selenium	<0.013	<0.013	--	20	
		Silver	<0.006	<0.006	--	20	
QbHg020521	S21020018 Dup	Mercury	<0.0002	<0.0002	--	20	
		MS(mg/L)					
QC Batch ID	MS ID	Parameter	Sample	MS Spk	MS	% Rec	
		TCLP Metals	Result	Added	Result	% Rec	Limit
QbMA020521	S21020018 MS	Arsenic	0.022	3.000	3.670	122	70-130
		Barium	0.208	3.000	3.497	110	70-130
		Cadmium	<0.002	3.000	3.129	104	70-130
		Chromium	<0.012	3.000	2.984	99	70-130
		Lead	0.007	3.000	2.803	93	70-130
		Selenium	<0.013	3.000	3.670	122	70-130
		Silver	<0.006	3.000	2.926	98	70-130

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Environmental & Industrial Hygiene Services

Client: Environmental Response Service
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Lake Charles, LA- 70605

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5544 Leopard Street, Corpus Christi, Texas 78408 (361) 299-9900 FAX (361) 299-1155
138 S. Cities Service Hwy., Sulphur, Louisiana 70663 (337) 626-2121 FAX (337) 626-2126
401 N. 11th Street, La Porte, Texas 77571 (281) 867-9900 FAX (281) 867-1155

Reporting Date: 02/22/21
CHEMTEx File #: S21020018

LABORATORY QUALITY CONTROL DATA
Method Blank (mg/L)

QC Batch ID	MB ID	Parameter	Result	RL
		TCLP Volatiles		
QbVOA021021	SV021021MB	Vinyl chloride	<0.0025	0.0025
QbVOA021021	SV021021MB	1,1-Dichloroethene	<0.0025	0.0025
QbVOA021021	SV021021MB	2-Butanone	<0.0125	0.0125
QbVOA021021	SV021021MB	Chloroform	<0.0025	0.0025
QbVOA021021	SV021021MB	1,2-Dichloroethane	<0.0025	0.0025
QbVOA021021	SV021021MB	Carbon tetrachloride	<0.0025	0.0025
QbVOA021021	SV021021MB	Benzene	<0.0025	0.0025
QbVOA021021	SV021021MB	Trichloroethene	<0.0025	0.0025
QbVOA021021	SV021021MB	Tetrachloroethene	<0.0025	0.0025
QbVOA021021	SV021021MB	Chlorobenzene	<0.0025	0.0025
QbVOA021021	SV021021MB	1,4-Dichlorobenzene	<0.0025	0.0025

Sample Dup(mg/L)

QC Batch ID	MB ID	Parameter	Sample Result	Sample Dup Result	RPD (%)	RPD Limit
QbVOA021021	P21020060 Dup	TCLP Volatiles				
QbVOA021021	P21020060 Dup	Vinyl chloride	<0.0250	<0.0250	--	30
QbVOA021021	P21020060 Dup	1,1-Dichloroethene	<0.0250	<0.0250	--	30
QbVOA021021	P21020060 Dup	2-Butanone	<0.1250	<0.1250	--	30
QbVOA021021	P21020060 Dup	Chloroform	0.0359	0.0394	9.2	30
QbVOA021021	P21020060 Dup	1,2-Dichloroethane	<0.0250	<0.0250	--	30
QbVOA021021	P21020060 Dup	Carbon tetrachloride	<0.0250	<0.0250	--	30
QbVOA021021	P21020060 Dup	Benzene	<0.0250	<0.0250	--	30
QbVOA021021	P21020060 Dup	Trichloroethene	<0.0250	<0.0250	--	30
QbVOA021021	P21020060 Dup	Tetrachloroethene	<0.0250	<0.0250	--	30
QbVOA021021	P21020060 Dup	Chlorobenzene	<0.0250	<0.0250	--	30
QbVOA021021	P21020060 Dup	1,4-Dichlorobenzene	<0.0250	<0.0250	--	30

Method Blank (mg/L)

QC Batch ID	MB ID	Parameter	Result	RL
		TCLP Semivolatiles		
QbSVOA022121	SD022121MB	Pyridine	<0.005	0.005
QbSVOA022121	SD022121MB	2-methylphenol	<0.005	0.005
QbSVOA022121	SD022121MB	4-Methylphenol	<0.005	0.005
QbSVOA022121	SD022121MB	Hexachloroethane	<0.005	0.005
QbSVOA022121	SD022121MB	Nitrobenzene	<0.005	0.005
QbSVOA022121	SD022121MB	Hexachloro 1,3-butadiene	<0.005	0.005
QbSVOA022121	SD022121MB	2,4,6-Trichlorophenol	<0.005	0.005
QbSVOA022121	SD022121MB	2,4,5-Trichlorophenol	<0.005	0.005
QbSVOA022121	SD022121MB	2,4-Dinitrotoluene	<0.005	0.005
QbSVOA022121	SD022121MB	Hexachlorobenzene	<0.005	0.005
QbSVOA022121	SD022121MB	Pentachlorophenol	<0.005	0.005

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Reporting Date: 02/22/21
CHEMTEx File #: S21020018

LABORATORY QUALITY CONTROL DATA

LCS (mg/L)

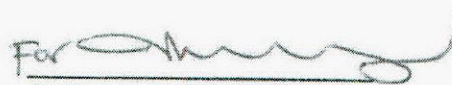
QC Batch ID	LCS ID	Parameter	Spk	LCS	LCS	% Rec.
		TCLP Semivolatiles	Added	Result	Rec. (%)	Limit
QbSVOA022121	SD022121LCS	Pyridine	30	24.90	83	70-130
QbSVOA022121	SD022121LCS	2-methylphenol	30	15.28	51	70-130
QbSVOA022121	SD022121LCS	4-Methylphenol	30	13.65	46	70-130
QbSVOA022121	SD022121LCS	Hexachloroethane	30	30.45	101	70-130
QbSVOA022121	SD022121LCS	Nitrobenzene	30	30.47	102	70-130
QbSVOA022121	SD022121LCS	Hexachloro 1,3-butadiene	30	30.23	101	70-130
QbSVOA022121	SD022121LCS	2,4,6-Trichlorophenol	30	33.43	111	70-130
QbSVOA022121	SD022121LCS	2,4,5-Trichlorophenol	30	32.81	109	70-130
QbSVOA022121	SD022121LCS	2,4-Dinitrotoluene	30	37.17	124	70-130
QbSVOA022121	SD022121LCS	Hexachlorobenzene	30	27.57	92	70-130
QbSVOA022121	SD022121LCS	Pentachlorophenol	30	30.01	100	70-130

Dup (mg/L)

QC Batch ID	Sample ID	Parameter	Sample	Sample	RPD	RPD
		TCLP Semivolatiles	Results	Dup Results		Limit
QbSVOA022121	P21020060 Dup	Pyridine	<0.005	<0.005	--	30
QbSVOA022121	P21020060 Dup	2-methylphenol	<0.005	<0.005	--	30
QbSVOA022121	P21020060 Dup	4-Methylphenol	<0.005	<0.005	--	30
QbSVOA022121	P21020060 Dup	Hexachloroethane	<0.005	<0.005	--	30
QbSVOA022121	P21020060 Dup	Nitrobenzene	<0.005	<0.005	--	30
QbSVOA022121	P21020060 Dup	Hexachloro 1,3-butadiene	<0.005	<0.005	--	30
QbSVOA022121	P21020060 Dup	2,4,6-Trichlorophenol	<0.005	<0.005	--	30
QbSVOA022121	P21020060 Dup	2,4,5-Trichlorophenol	<0.005	<0.005	--	30
QbSVOA022121	P21020060 Dup	2,4-Dinitrotoluene	<0.005	<0.005	--	30
QbSVOA022121	P21020060 Dup	Hexachlorobenzene	<0.005	<0.005	--	30
QbSVOA022121	P21020060 Dup	Pentachlorophenol	<0.005	<0.005	--	30

QC Batch ID	MB ID	Method Blank (mg/kg)	Parameter	Result	RL
QbRCI020921	CN020921MB		Reactive Cyanide	<5.0	5.0
QbRCI020921	SUL020921MB		Reactive Sulfide	<10.0	10.0

QC Batch ID	LCS ID	LCS (mg/kg)	Parameter	Spk	LCS	LCS	% Rec
				Added	Result	% Rec	Limit
QbRCI020921	CN020921LCS		Reactive Cyanide	25.00	21.31	85.2	80-120
QbRCI020921	SUL020921LCS		Reactive Sulfide	25.00	24.7	99	80-120
QbFP020821	Pxy020821LCS		Ignitability (°F)	80	80	100	78-82



Dr. C. N. Reddy, Ph.D, CIH, ASP
Laboratory Director

ra/CNR

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November 13, 2019

Thomas Harris
Environmental Response Services, Inc.
P O Box 4288
LAKE CHARLES, LA 70606
TEL: (337) 562-0001
FAX (337) 562-0002

RE: CW Box #2

Order No.: 19110054

Dear Thomas Harris:

Element Materials Technology Lafayette received 1 sample(s) on 11/4/2019 for the analyses presented in the following report.

In accordance with your instructions Element Lafayette conducted the analysis shown on the following pages on samples submitted by your company. The results related only to the items tested. Unless otherwise noted, all analyses were conducted using EPA approved methodologies and all test results meet all requirements of TNI. All relevant sampling information is on the attached Chain-of-Custody form.

All soil data, except for 29-B, are on a wet-weight basis unless otherwise indicated in the units field as -dry.

LELAP Certification No.: 01997. TCEQ Certification No.: T104704261. LDHH Certification No.: LA180028. ISDH Certification No.: C-LA-01. NDELCP Certification No.: R-226. A scope of accredited parameters is available upon request. A "#" by the test method or analyte indicates this parameter is outside the scope of accreditation.

Estimated uncertainty is available upon request. This report shall not be reproduced except in full, without the written approval of the laboratory.

If you have any questions regarding these test results, please feel free to call.

A handwritten signature in black ink, appearing to read 'Cristina Thibaux'.

Cristina Thibaux
Customer Service Supervisor
2417 W. Pinhook Road
Lafayette, LA 70508-3344



Element Materials Technology Lafayette
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Lafayette, LA 70508-3344
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Case Narrative

WO#: 19110054

Date: 11/13/2019

CLIENT: Environmental Response Services, Inc.

Project: CW Box #2

Unless specified by the client, a duplicate or MS/MSD, wherever applicable, is randomly selected and analyzed from each analytical batch provided sample volume is sufficient. The sample chosen for duplicate or MS/MSD may or may not be a sample submitted in this workorder. A method blank and/or a lab control sample (LCS)/lab control sample duplicate (LCSD), wherever applicable, are processed as a quality control check for each analytical batch. When the matrix QC data is not available due to insufficient sample volume or when the results indicate possible matrix effect, the validity of the batch is determined by the method blank and LCS/LCSD.

The results of the laboratory internal quality control data are provided in the QC Summary Report section of the report for your review. Laboratory-related QC exceptions that may impact the validity of data are discussed in the case narrative. Sample-related QC exceptions are flagged either in the results page(s) or in the QC report page(s). End users should consider QC exceptions when evaluating sample data against data quality objectives.

Any other exceptions associated with this report will be footnoted in the results page(s) or the QC summary page(s).



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Analytical Report

WO#: 19110054

Date Reported: 11/13/2019

CLIENT: Environmental Response Services, Inc. **Collection Date:** 11/4/2019 6:30:00 AM
Project: CW Box #2
Lab ID: 19110054-001 **Matrix:** SOLID
Client Sample ID ERS Oily Solids
Sample Location:

Analyses	Result	RL	Qual	Units	DF	PL	Date Analyzed
MERCURY, TCLP LEACHED		SW7470A				Analyst: BXB	
Mercury	< 0.000200	0.000200		mg/L	1	0.2	11/8/2019 10:38:34 AM
ICP METALS, TCLP LEACHED		SW6010B				Analyst: STS	
Arsenic	< 0.0500	0.0500		mg/L	1	5	11/12/2019 2:24:47 PM
Barium	0.249	0.0100		mg/L	1	100	11/12/2019 2:24:47 PM
Cadmium	< 0.00500	0.00500		mg/L	1	1	11/12/2019 2:24:47 PM
Chromium	< 0.0100	0.0100		mg/L	1	5	11/12/2019 2:24:47 PM
Lead	< 0.0100	0.0100		mg/L	1	5	11/12/2019 2:24:47 PM
Selenium	< 0.0400	0.0400		mg/L	1	1	11/12/2019 2:24:47 PM
Silver	< 0.00500	0.00500		mg/L	1	5	11/12/2019 2:24:47 PM
VOLATILES, TCLP LEACHED		SW8260B				Analyst: KSK	
Benzene	< 0.100	0.100		mg/L	20	0.5	11/7/2019 4:04:00 PM
Surr: 4-Bromofluorobenzene	87.0	65.1-136		%Rec	20		11/7/2019 4:04:00 PM
Surr: Dibromofluoromethane	126	40.4-143		%Rec	20		11/7/2019 4:04:00 PM
Surr: Toluene-d8	94.1	58.2-127		%Rec	20		11/7/2019 4:04:00 PM

Qualifiers:

- * Value exceeds Maximum Contaminant Level.
- C Value is below Minimum Compound Limit.
- E Value above quantitation range
- J Analyte detected below quantitation limits
- ND Not Detected at the Reporting Limit

- B Analyte detected in the associated Method Blank
- DF Dilution Factor
- H Holding times for preparation or analysis exceeded
- M Matrix Interference
- R RPD outside accepted recovery limits



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QC SUMMARY REPORT

WO#: 19110054
13-Nov-19

Client: Environmental Response Services, Inc.

Project: CW Box #2

BatchID: 32161

Sample ID	MB-32161	SampType:	MBLK	TestCode:	HG_TCLP	Units:	mg/L	Prep Date:	11/8/2019	RunNo:	83558			
Client ID:	PBW	Batch ID:	32161	TestNo:	SW7470A			Analysis Date:	11/8/2019	SeqNo:	2090759			
Analyte		Result		PQL	SPK value	SPK Ref Val		%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Mercury		< 0.000200		0.000200										

Sample ID	LCS-32161	SampType:	LCS	TestCode:	HG_TCLP	Units:	mg/L	Prep Date:	11/8/2019	RunNo:	83558	
Client ID:	LCSW	Batch ID:	32161	TestNo:	SW7470A			Analysis Date:	11/8/2019	SeqNo:	2090760	
Analyte		Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Mercury		0.0108	0.000200	0.01000	0	108	80	120				

Sample ID	LCSD-32161	SampType:	LCSD	TestCode:	HG_TCLP	Units:	mg/L	Prep Date:	11/8/2019	RunNo:	83558	
Client ID:	LCSS02	Batch ID:	32161	TestNo:	SW7470A			Analysis Date:	11/8/2019	SeqNo:	2090761	
Analyte		Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Mercury		0.0110	0.000200	0.01000	0	110	80	120	0.01079	1.72	20	

Sample ID	19110054-001AMS	SampType:	MS	TestCode:	HG_TCLP	Units:	mg/L	Prep Date:	11/8/2019	RunNo:	83558	
Client ID:	ERS Oily Solids	Batch ID:	32161	TestNo:	SW7470A			Analysis Date:	11/8/2019	SeqNo:	2090764	
Analyte		Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Mercury		0.0107	0.000200	0.01000	0	107	75	125				

Qualifiers: H Holding times for preparation or analysis exceeded M Matrix Interference ND Not Detected at the Reporting Limit
RL Reporting Limit S Spike Recovery outside accepted recovery limits SDL Sample detection limit
U Analyte not detected W Sample container temperature is out of limit as specified at testcode



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QC SUMMARY REPORT

WO#: 19110054
13-Nov-19

Client: Environmental Response Services, Inc.
Project: CW Box #2

BatchID: 32161

Sample ID	19110054-001AMSD	SampType:	MSD	TestCode:	HG_TCLP	Units:	mg/L	Prep Date:	11/8/2019	RunNo:	83558
Client ID:	ERS Oily Solids	Batch ID:	32161	TestNo:	SW7470A			Analysis Date:	11/8/2019	SeqNo:	2090765
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Mercury	0.0108	0.000200	0.01000	0	108	75	125	0.01072	1.12	20	

Qualifiers:	H	Holding times for preparation or analysis exceeded	M	Matrix Interference	ND	Not Detected at the Reporting Limit
	RL	Reporting Limit	S	Spike Recovery outside accepted recovery limits	SDL	Sample detection limit
	U	Analyte not detected	W	Sample container temperature is out of limit as specified at testcode		



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QC SUMMARY REPORT

WO#: 19110054

13-Nov-19

Client: Environmental Response Services, Inc.

Project: CW Box #2

BatchID: 32176

Sample ID	MB-32176	SampType:	MBLK	TestCode:	6010_TCLP	Units:	mg/L	Prep Date:	11/11/2019	RunNo:	83645
Client ID:	PBW	Batch ID:	32176	TestNo:	SW6010B			Analysis Date:	11/12/2019	SeqNo:	2092444
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Arsenic	< 0.0500	0.0500									
Barium	< 0.0100	0.0100									
Cadmium	< 0.00500	0.00500									
Chromium	< 0.0100	0.0100									
Lead	< 0.0100	0.0100									
Selenium	< 0.0400	0.0400									
Silver	< 0.00500	0.00500									

Sample ID	LCS-32176	SampType:	LCS	TestCode:	6010_TCLP	Units:	mg/L	Prep Date:	11/11/2019	RunNo:	83645
Client ID:	LCSW	Batch ID:	32176	TestNo:	SW6010B			Analysis Date:	11/12/2019	SeqNo:	2092449
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Arsenic	0.497	0.0500	0.5000	0	99.5	80	120				
Barium	0.482	0.0100	0.5000	0	96.3	80	120				
Cadmium	0.483	0.00500	0.5000	0	96.6	80	120				
Chromium	0.482	0.0100	0.5000	0	96.4	80	120				
Lead	0.483	0.0100	0.5000	0	96.6	80	120				
Selenium	0.509	0.0400	0.5000	0	102	80	120				
Silver	0.0958	0.00500	0.1000	0	95.8	80	120				

Qualifiers: H Holding times for preparation or analysis exceeded
RL Reporting Limit
U Analyte not detected

M Matrix Interference
S Spike Recovery outside accepted recovery limits
W Sample container temperature is out of limit as specified at testcode

ND Not Detected at the Reporting Limit
SDL Sample detection limit



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QC SUMMARY REPORT

WO#: 19110054

13-Nov-19

Client: Environmental Response Services, Inc.

Project: CW Box #2

BatchID: 32176

Sample ID	LCSD-32176	SampType:	LCSD	TestCode:	6010_TCLP	Units:	mg/L	Prep Date:	11/11/2019	RunNo:	83645
Client ID:	LCSS02	Batch ID:	32176	TestNo:	SW6010B			Analysis Date:	11/12/2019	SeqNo:	2092450
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Arsenic	0.501	0.0500	0.5000	0	100	80	120	0.4974	0.621	20	
Barium	0.482	0.0100	0.5000	0	96.4	80	120	0.4816	0.125	20	
Cadmium	0.485	0.00500	0.5000	0	96.9	80	120	0.4828	0.372	20	
Chromium	0.483	0.0100	0.5000	0	96.6	80	120	0.4818	0.207	20	
Lead	0.488	0.0100	0.5000	0	97.5	80	120	0.4830	0.948	20	
Selenium	0.495	0.0400	0.5000	0	99.1	80	120	0.5088	2.69	20	
Silver	0.0965	0.00500	0.1000	0	96.5	80	120	0.09580	0.728	20	

Sample ID	LCS-3	SampType:	LCS	TestCode:	6010_TCLP	Units:	mg/L	Prep Date:	11/11/2019	RunNo:	83645
Client ID:	LCSW	Batch ID:	32176	TestNo:	SW6010B			Analysis Date:	11/12/2019	SeqNo:	2092451
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Arsenic	0.521	0.0500	0.5000	0	104	80	120				
Barium	0.482	0.0100	0.5000	0	96.3	80	120				
Cadmium	0.484	0.00500	0.5000	0	96.9	80	120				
Chromium	0.483	0.0100	0.5000	0	96.6	80	120				
Lead	0.490	0.0100	0.5000	0	98.0	80	120				
Selenium	0.505	0.0400	0.5000	0	101	80	120				
Silver	0.0971	0.00500	0.1000	0	97.1	80	120				

Qualifiers:

H Holding times for preparation or analysis exceeded
RL Reporting Limit
U Analyte not detected

M Matrix Interference
S Spike Recovery outside accepted recovery limits
W Sample container temperature is out of limit as specified at testcode

ND Not Detected at the Reporting Limit
SDL Sample detection limit



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QC SUMMARY REPORT

WO#: 19110054

13-Nov-19

Client: Environmental Response Services, Inc.

Project: CW Box #2

BatchID: 32176

Sample ID	LCS-4	SampType: LCS	TestCode: 6010_TCLP	Units: mg/L	Prep Date: 11/11/2019	RunNo: 83645					
Client ID:	LCSW	Batch ID: 32176	TestNo: SW6010B		Analysis Date: 11/12/2019	SeqNo: 2092452					
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Arsenic	0.506	0.0500	0.5000	0	101	80	120				
Barium	0.477	0.0100	0.5000	0	95.5	80	120				
Cadmium	0.481	0.00500	0.5000	0	96.2	80	120				
Chromium	0.479	0.0100	0.5000	0	95.8	80	120				
Lead	0.482	0.0100	0.5000	0	96.3	80	120				
Selenium	0.494	0.0400	0.5000	0	98.7	80	120				
Silver	0.0959	0.00500	0.1000	0	95.9	80	120				

Sample ID	19110064-001AMS	SampType: MS	TestCode: 6010_TCLP	Units: mg/L	Prep Date: 11/11/2019	RunNo: 83645					
Client ID:	ZZZZZZ	Batch ID: 32176	TestNo: SW6010B		Analysis Date: 11/12/2019	SeqNo: 2092454					
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Arsenic	0.573	0.0500	0.5000	0	115	75	125				
Barium	1.26	0.0100	0.5000	0.6894	114	75	125				
Cadmium	2.86	0.00500	0.5000	2.287	114	75	125				
Chromium	0.573	0.0100	0.5000	0	115	75	125				
Lead	0.555	0.0100	0.5000	0	111	75	125				
Selenium	0.570	0.0400	0.5000	0.04470	105	75	125				
Silver	0.104	0.00500	0.1000	0.0005000	104	75	125				

Qualifiers:

H Holding times for preparation or analysis exceeded
RL Reporting Limit
U Analyte not detected

M Matrix Interference
S Spike Recovery outside accepted recovery limits
W Sample container temperature is out of limit as specified at testcode

ND Not Detected at the Reporting Limit
SDL Sample detection limit



Element Materials Technology Lafayette
2417 W. Pinhook Road
Lafayette, LA 70508-3344
TEL: (337) 235-0483 FAX: (337) 233-6540
Website: www.element.com

QC SUMMARY REPORT

WO#: 19110054

13-Nov-19

Client: Environmental Response Services, Inc.

Project: CW Box #2

BatchID: 32176

Sample ID	19110064-001AMSD	SampType:	MSD	TestCode:	6010_TCLP	Units:	mg/L	Prep Date:	11/11/2019	RunNo:	83645
Client ID:	ZZZZZZ	Batch ID:	32176	TestNo:	SW6010B			Analysis Date:	11/12/2019	SeqNo:	2092455
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Arsenic	0.554	0.0500	0.5000	0	111	75	125	0.5733	3.39	20	
Barium	1.23	0.0100	0.5000	0.6894	109	75	125	1.261	2.16	20	
Cadmium	2.82	0.00500	0.5000	2.287	107	75	125	2.859	1.27	20	
Chromium	0.533	0.0100	0.5000	0	107	75	125	0.5733	7.34	20	
Lead	0.528	0.0100	0.5000	0	106	75	125	0.5549	5.01	20	
Selenium	0.512	0.0400	0.5000	0.04470	93.5	75	125	0.5698	10.7	20	
Silver	0.0997	0.00500	0.1000	0.0005000	99.2	75	125	0.1044	4.61	20	

Qualifiers:

H Holding times for preparation or analysis exceeded
RL Reporting Limit
U Analyte not detected

M Matrix Interference
S Spike Recovery outside accepted recovery limits
W Sample container temperature is out of limit as specified at testcode

ND Not Detected at the Reporting Limit
SDL Sample detection limit



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Lafayette, LA 70508-3344
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Website: www.element.com

QC SUMMARY REPORT

WO#: 19110054

13-Nov-19

Client: Environmental Response Services, Inc.
Project: CW Box #2

BatchID: R83552

Sample ID	MB TCLP	SampType:	MBLK	TestCode:	8260_TCLP	Units:	mg/L	Prep Date:		RunNo:	83552
Client ID:	PBW	Batch ID:	R83552	TestNo:	SW8260B			Analysis Date:	11/7/2019	SeqNo:	2090696
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Benzene	< 0.00500	0.00500									
Surr: 4-Bromofluorobenzene	0.0257		0.03000		85.7	65.1	136				
Surr: Dibromofluoromethane	0.0375		0.03000		125	40.4	143				
Surr: Toluene-d8	0.0292		0.03000		97.4	58.2	127				

Sample ID	19110054-001AMS	SampType:	MS	TestCode:	8260_TCLP	Units:	mg/L	Prep Date:	11/6/2019	RunNo:	83552
Client ID:	ERS Oily Solids	Batch ID:	R83552	TestNo:	SW8260B			Analysis Date:	11/7/2019	SeqNo:	2090697
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Benzene	0.984	0.100	1.000	0	98.4	67.2	121				
Surr: 4-Bromofluorobenzene	0.568		0.6000		94.7	65.1	136				
Surr: Dibromofluoromethane	0.722		0.6000		120	40.4	143				
Surr: Toluene-d8	0.576		0.6000		95.9	58.2	127				

Sample ID	19110054-001AMSD	SampType:	MSD	TestCode:	8260_TCLP	Units:	mg/L	Prep Date:	11/6/2019	RunNo:	83552
Client ID:	ERS Oily Solids	Batch ID:	R83552	TestNo:	SW8260B			Analysis Date:	11/7/2019	SeqNo:	2090698
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Benzene	1.01	0.100	1.000	0	101	67.2	121	0.9844	2.86	20	
Surr: 4-Bromofluorobenzene	0.569		0.6000		94.8	65.1	136		0	20	
Surr: Dibromofluoromethane	0.722		0.6000		120	40.4	143		0	20	
Surr: Toluene-d8	0.582		0.6000		97.1	58.2	127		0	20	

Qualifiers:

H	Holding times for preparation or analysis exceeded	M	Matrix Interference	ND	Not Detected at the Reporting Limit
RL	Reporting Limit	S	Spike Recovery outside accepted recovery limits	SDL	Sample detection limit
U	Analyte not detected	W	Sample container temperature is out of limit as specified at testcode		



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Lafayette, LA 70508-3344
TEL: (337) 235-0483 FAX: (337) 233-6540
Website: www.element.com

QC SUMMARY REPORT

WO#: 19110054

13-Nov-19

Client: Environmental Response Services, Inc.

Project: CW Box #2

BatchID: R83552

Sample ID	LCSD 17221B-5	SampType:	LCSD	TestCode:	8260_TCLP	Units:	mg/L	Prep Date:		RunNo:	83552
Client ID:	LCSS02	Batch ID:	R83552	TestNo:	SW8260B			Analysis Date:	11/7/2019	SeqNo:	2090700
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Benzene	0.0452	0.00500	0.05000	0	90.3	67.8	125	0.04486	0.689	20	
Surr: 4-Bromofluorobenzene	0.0289		0.03000		96.2	65.1	136		0	20	
Surr: Dibromofluoromethane	0.0360		0.03000		120	40.4	143		0	20	
Surr: Toluene-d8	0.0296		0.03000		98.8	58.2	127		0	20	

Sample ID	LCS 17221B-57	SampType:	LCS	TestCode:	8260_TCLP	Units:	mg/L	Prep Date:		RunNo:	83552
Client ID:	LCSSW	Batch ID:	R83552	TestNo:	SW8260B			Analysis Date:	11/7/2019	SeqNo:	2090701
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Benzene	0.0449	0.00500	0.05000	0	89.7	67.8	125				
Surr: 4-Bromofluorobenzene	0.0278		0.03000		92.5	65.1	136				
Surr: Dibromofluoromethane	0.0354		0.03000		118	40.4	143				
Surr: Toluene-d8	0.0287		0.03000		95.6	58.2	127				

Qualifiers:

H Holding times for preparation or analysis exceeded
RL Reporting Limit
U Analyte not detected

M Matrix Interference
S Spike Recovery outside accepted recovery limits
W Sample container temperature is out of limit as specified at testcode

ND Not Detected at the Reporting Limit
SDL Sample detection limit



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Sample Log-In Check List

Client Name: **ENVIRO_RESPONSE**

Work Order Number: **19110054**

RcptNo: 1

Logged by: **Danielle Hollier** 11/4/2019 2:40:00 PM
Completed By: **Danielle Hollier** 11/4/2019 3:08:23 PM
Reviewed By: **Caitlin Duplantis** 11/12/2019 3:18:23 PM

Danielle Hollier
Danielle Hollier
Caitlin Duplantis

Chain of Custody

1. Is Chain of Custody complete? Yes ☐ No ☒ Not Present ☐
2. How was the sample delivered? Element

Log In

3. Coolers are present? Yes ☒ No ☐ NA ☐
4. Shipping container/cooler in good condition? Yes ☒ No ☐
Custody seals intact on shipping container/cooler? Yes ☐ No ☐ Not Present ☒
No. Seal Date: Signed By:
5. Was an attempt made to cool the samples? Yes ☒ No ☐ NA ☐
6. Were all samples received at a temperature of $>0^{\circ}\text{C}$ to 6.0°C ? Yes ☒ No ☐ NA ☐
7. Sample(s) in proper container(s)? Yes ☒ No ☐
8. Sufficient sample volume for indicated test(s)? Yes ☒ No ☐
9. Are samples (except VOA and ONG) properly preserved? Yes ☒ No ☐
10. Was preservative added to bottles? Yes ☐ No ☒ NA ☐
11. Is the headspace in the VOA vials less than 1/4 inch or 6 mm? Yes ☐ No ☐ No VOA Vials ☒
12. Were any sample containers received broken? Yes ☐ No ☒
13. Does paperwork match bottle labels? Yes ☒ No ☐
(Note discrepancies on chain of custody)
14. Are matrices correctly identified on Chain of Custody? Yes ☒ No ☐
15. Is it clear what analyses were requested? Yes ☒ No ☐
16. Were all holding times able to be met? Yes ☒ No ☐
(If no, notify customer for authorization.)

Special Handling (if applicable)

17. Was client notified of all discrepancies with this order? Yes ☐ No ☒ NA ☐

Person Notified: Date:
By Whom: Via: ☐ eMail ☐ Phone ☐ Fax ☐ In Person
Regarding:
Client Instructions:

18. Additional remarks:
Incomplete custody signature(s) prior to receipt by Element personnel

Cooler Information

Cooler No	Temp °C	Condition	Seal Intact	Seal No	Seal Date	Signed By
1	0.1	Good	Not Present			



element

Chain of Custody

Laboratory Number

1910054

Company Name Contact Name Address City, State Zip Phone Number Fax Number E-mail Address	Client Information: Environmental Response Services Thomas Harris 8583 Joe Ledoux Rd Lake Charles, L.A. 70605 337-562-0001 Ext. Thomas.h@ers-nbc.com	Billing Information: P.O. Box 4288 Lake Charles, L.A. 70601	PO Number: Quote Number: Required QC Level: ☐ Yes ☐ No	Project Name/Number: C.W. Box #2 Sampler's Signature: Shipping Method: UPS / FedEx / Airborne DHL / Element / Hand / Mail	Page of Matrix Code DW = Drinking Water WW = Waste Water GW = Ground Water AQ = Aqueous OT = Other SL = Sludge SOL = Solid O = Oil SO = Soil F = Food SW = Swab NG = Natural Gas NGL = Natural Gas Liquid PW = Produced Water CF = Completion Fluid
--	---	--	---	---	---

Which Regulations Apply:		Turn Time	(Rush turn times will incur a surcharge and must be pre-approved by lab.)	Container	Pres.	Requested Tests										Comments	
☐ RCRA ☐ POTW ☐ NPDES ☐ USDA/FDA ☐ RECAP/RISC		☐ Drinking Water ☐ Distribution ☐ Special ☐ State ☐ Other	☒ Standard ☐ RUSH ☐ 1 Day ☐ 2 Day ☐ Other	Quantity Type P=Plastic, G=Glass, V=Vial	HCl, HNO ₃ , H ₂ SO ₄ NaOH, Na ₂ S ₂ O ₃ TCLP metals 8 RCRA TCLP Benzene												
Sample ID/Description		Date	Time	Grab / Composite	Matrix												
ERS Only Solids 76/10 11/4/19		11-4-19	0630	C	Sol	2	G										

	Relinquished by	Date/Time	Received by	Date/Time	Field Notes
1	Thomas Harris	11-4-19		11/4/19 1137	Received at lab on ice?
2	Neil Clark Rhonda Davis	11/4/19 1440		11-4-19 1440	0.1°Cm (R10)

All samples submitted to Element Materials Technology for analysis are accepted on a custodial basis only. Ownership of the material remains with the client submitting the samples. Element Materials Technology reserves the right to return unused sample portions.

9301 Innovation Drive, Suite 115 Daleville, IN 47334-0589 USA P 765-378-4103 F 765-378-4108	629 Washington St. Suite 300 Columbus, IN 47201-6231 USA P 812-375-0531 F 812-375-0731	2121 East Washington Boulevard Fort Wayne, IN 46803-1326 USA P 260-471-7000 F 260-471-7777	560 South Zimmer Road Warsaw, IN 46580-2368 USA P 574-267-3305 F 574-269-6569	3371 Cleveland Road, Suite 100A South Bend, IN 46625-9780 USA P 574-277-0707 F 574-277-0699	2417 W. Pinhook Rd Lafayette, LA 70508-3344 USA P 337-236-0483 F 337-233-6540
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EZ Profile™

Requested Facility: CWM Lake Charles☐ Unsure Profile Number: LB2912☐ Multiple Generator Locations (Attach Locations) ☐ Request Certificate of Disposal ☒ Renewal? Original Profile Number: LB2912**A. GENERATOR INFORMATION (MATERIAL ORIGIN)**

1. Generator Name: ENVIRONMENTAL RESPONSE SERVICES,
2. Site Address: 8583 JOE LEDOUX RD
(City, State, ZIP) LAKE CHARLES LA 70605
3. County: _____
4. Contact Name: NEIL CLARK/ PRESIDENT-GM
5. Email: OPS@ERS-NBC.COM
6. Phone: (337) 562-0001 7. Fax: (337) 562-0002
8. Generator EPA ID: LAR 000026534 ☐ N/A
9. State ID: _____ ☒ N/A

C. MATERIAL INFORMATION

1. Common Name: USED OIL CONTAMINATED SOLIDS
- Describe Process Generating Material: ☐ See Attached

MATERIAL LEFT OVER AFTER THE SEPARATION OF OIL FOR RECYCLING

2. Material Composition and Contaminants: ☐ See Attached

1. FILTERS, RAGS, PADS, NON-BIO ASORBENTS	75-100 %
2. SOIL	0-30 %
3. Oily cont RCRA empty crushed drums	0-100 %
4. empty supersacs	0-100 %

Total comp. must be equal to or greater than 100% ≥100%

3. State Waste Codes: _____ ☒ N/A
4. Color: MULTI COLORED
5. Physical State at 70°F: ☒ Solid ☐ Liquid ☐ Other: _____
6. Free Liquid Range Percentage: _____ to _____ ☒ N/A
7. pH: 6 to 10 ☐ N/A
8. Strong Odor: ☐ Yes ☒ No Describe: _____
9. Flash Point: ☐ <140°F ☐ 140°-199°F ☒ ≥200° ☒ N/A

E. ANALYTICAL AND OTHER REPRESENTATIVE INFORMATION

1. Analytical attached ☐ Yes
- Please identify applicable samples and/or lab reports:

2. Other information attached (such as MSDS)? ☐ Yes

G. GENERATOR CERTIFICATION (PLEASE READ AND CERTIFY BY SIGNATURE)

By signing this EZ Profile™ form, I hereby certify that all information submitted in this and all attached documents contain true and accurate descriptions of this material, and that all relevant information necessary for proper material characterization and to identify known and suspected hazards has been provided. Any analytical data attached was derived from a sample that is representative as defined in 40 CFR 261 - Appendix 1 or by using an equivalent method. All changes occurring in the character of the material (i.e., changes in the process or new analytical) will be identified by the Generator and be disclosed to Waste Management prior to providing the material to Waste Management.

If I am an agent signing on behalf of the Generator, I have confirmed with the Generator that information contained in this Profile is accurate and complete.

Name (Print): B. RENE DILLON Date: 09/18/2015

Title: TECHNICAL WASTE MANAGER

Company: ENVIRONMENTAL RESPONSE SERVICES

B. BILLING INFORMATION☐ SAME AS GENERATOR

1. Billing Name: ENVIRONMENTAL RESPONSE SERVICES, INC.
2. Billing Address: PO BOX 4288
(City, State, ZIP) LAKE CHARLES LA 70606-4288
3. Contact Name: KELLY J CLARK
4. Email: KELLY.C@ERS-NBC.COM
5. Phone: (337) 562-0001 6. Fax: (337) 562-0002
7. WM Hauled? ☐ Yes ☐ No
8. P.O. Number: _____
9. Payment Method: ☐ Credit Account ☐ Cash ☐ Credit Card

D. REGULATORY INFORMATION

1. EPA Hazardous Waste? ☐ Yes* ☒ No
Code: _____
2. State Hazardous Waste? ☐ Yes ☒ No
Code: _____
3. Is this material non-hazardous due to Treatment, Delisting, or an Exclusion? ☐ Yes* ☒ No
4. Contains Underlying Hazardous Constituents? ☐ Yes* ☒ No
5. From an industry regulated under Benzene NESHAP? ☐ Yes* ☒ No
6. Facility remediation subject to 40 CFR 63 GGGGG? ☐ Yes* ☒ No
7. CERCLA or State-mandated clean-up? ☐ Yes* ☒ No
8. NRC or State-regulated radioactive or NORM waste? ☐ Yes* ☒ No
- *If Yes, see Addendum (page 2) for additional questions and space.
9. Contains PCBs? → If Yes, answer a, b and c. ☐ Yes ☒ No
- a. Regulated by 40 CFR 761? ☐ Yes ☐ No
- b. Remediation under 40 CFR 761.61 (a)? ☐ Yes ☐ No
- c. Were PCB imported into the US? ☐ Yes ☐ No
10. Regulated and/or Untreated Medical/Infectious Waste? ☐ Yes ☒ No
11. Contains Asbestos? ☐ Yes ☒ No
→ If Yes: ☐ Non-Friable ☐ Non-Friable - Regulated ☐ Friable

F. SHIPPING AND DOT INFORMATION

1. ☐ One-Time Event ☒ Repeat Event/Ongoing Business
2. Estimated Quantity/Unit of Measure: 100
☐ Tons ☒ Yards ☐ Drums ☐ Gallons ☐ Other: _____
3. Container Type and Size: 25 YARD ROLL OFF
4. USDOT Proper Shipping Name: _____ ☒ N/A

Certification Signature

THINK GREEN.®

QUESTIONS? CALL 800 963 4776 FOR ASSISTANCE

Revised June 30, 2015
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Environmental & Industrial Hygiene Services

3082 25th Street, Port Arthur, Texas 77642 (409) 983-4575 FAX (409) 982-1522
 5544 Leopard Street, Corpus Christi, Texas 78408 (361) 299-9900 FAX (361) 299-1155
 138 S. Cities Service Hwy., Sulphur, Louisiana 70663 (337) 626-2121 FAX (337) 626-2126
 401 N. 11 Street, La Porte, Texas 77571 (281) 867-9900 FAX (281) 867-1155

Client: Environmental Response Service
 8583 Joe leDoux Rd
 Lake Charitws, LA-70605

Attn: Mr. Neil Clark
 Phone: 337-562-0001 Fax: 337-562-0002
 Email: ops@ers-nbc.com

Reporting Date: 10/24/22
 Sample Matrix: Sludge
 Date Collected: 10/17/22
 Time Collected: 10:00am
 Collected by: Neil Clark
 Date Received: 10/17/22
 Time Received: 04:17pm
 CHEMTEX File #: P22100139

RESULTS OF ANALYSIS
 Project : TANK CLEANING BOTTOMS
 Site/Location: ERS YARD

Parameter	Units	Results	R.L	RMCCCL
TCLP Metals				
Arsenic	mg/L or ppm	0.056	0.007	5.0
Barium	mg/L or ppm	0.226	0.002	100.0
Cadmium	mg/L or ppm	0.030	0.002	1.0
Chromium	mg/L or ppm	0.022	0.012	5.0
Lead	mg/L or ppm	1.837	0.004	1.0
Selenium	mg/L or ppm	<0.013	0.013	5.0
Silver	mg/L or ppm	0.260	0.006	5.0
Mercury	mg/L or ppm	<0.0002	0.0002	0.2
BTEX				
Benzene	mg/Kg or ppm	<1.250	1.250	
Toluene	mg/Kg or ppm	21.650	1.250	
Ethylbenzene	mg/Kg or ppm	10.545	1.250	
m,p-Xylene	mg/Kg or ppm	22.640	2.500	
o-Xylene	mg/Kg or ppm	22.445	1.250	

Note: RL (Reporting Limit) values in our report are our lowest analyses limits, not the Reporting Limits to report to any Governmental Agencies.

RMCCCL: Regulatory Maximum Concentration of Contaminants in Leachate

Parameter	Method Reference	Date Analyzed/Analyst
TCLP Metals	EPA 1311/6010B	10/21/22 NNR
TCLP Mercury	EPA 1311/7470A	10/20/22 NNR
BTEX	EPA 8260C	10/20/22 BCV

Dr. C. N. Reddy, Ph.D, CIH, ASP
 Laboratory Director

ra/CNR

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Hazardous WAM Approval

Requested Management Facility: CWM Lake Charles

Profile Number: LB2912Waste Approval Expiration Date: 01/17/2024

APPROVAL DETAILS

Hazardous Classification: Nonhazardous Profile Renewal: ☒ Yes ☐ NoManagement Method: Direct LandfillGenerator Name: ENVIRONMENTAL RESPONSE SERVICES, INC.Material Name: USED OIL CONTAMINATED SOLIDS

Management Facility Precautions, Special Handling Procedures or Limitation on approval:

Generator Conditions

- Drums containing solids for direct landfill must be at least 90% full
- Drummed waste must be marked with profile number on top & side of the containers & bear only the appropriate labeling under RCRA and/or DOT provisions
- No free liquids
- Must meet applicable OSHA, DOT packaging, labeling, shipping and manifesting requirements per 49 CFR.
- Chemical Waste Management has all the necessary permits and licenses for the waste that has been characterized and identified by this approved profile.
- The WM decision is based on specific parameters defined within this waste profile. Waste received that is non-conforming in any way will need to be re-evaluated and managed in accordance with all RCRA and State regulations. If alternative treatment is not available and the waste cannot be managed it will be rejected back to the generator.
- Approved for bulk and drums

WM Authorization Name: Lisa AckerTitle: Waste Approval ManagerWM Authorization Signature: Date: 01/17/2022

Agency Authorization (if Required): _____

Date: _____

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QUESTIONS? CALL 800 963 4776 FOR ASSISTANCE

Last Revised April 11, 2014
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AI No.: 29918
Alt. ID No.: LAR000026534

Facility Name: Environmental Response Services
Inspection Date: Oct. 24, 2022 – Oct. 27, 2022

ATTACHMENT 5

Email Correspondence (5 Pages)

Agueda Mayard

From: Neil Clark <neil.c@ers-nbc.com>
Sent: Wednesday, February 1, 2023 3:44 PM
To: Agueda Mayard
Subject: RE: ERS Update

EXTERNAL EMAIL: Please do not click on links or attachments unless you know the content is safe.

None of the tanks I have are double walled

Neil Clark

From: Agueda Mayard <Agueda.Mayard@la.gov>
Sent: Wednesday, February 1, 2023 2:50 PM
To: Neil Clark <neil.c@ers-nbc.com>
Subject: RE: ERS Update

Mr. Clark,

Quick question regarding the frac tanks you use. Is each tank double-walled, or do some not possess this containment system?

Thank you,

A. Elena Mayard
Environmental Scientist III
Louisiana Department of Environmental Quality
Office of Environmental Compliance
Southwest Regional Office
(337) 491-2808

From: Agueda Mayard
Sent: Thursday, January 26, 2023 2:50 PM
To: 'Neil Clark' <neil.c@ers-nbc.com>
Cc: Jason Roy <Jason.Roy@LA.GOV>
Subject: RE: ERS Update

Thank you for providing an update. If you can provide any documentation for profiles, manifests, photo etc. that would be appreciated. I look forward to hearing from you Wednesday.

A. Elena Mayard
Environmental Scientist III
Louisiana Department of Environmental Quality
Office of Environmental Compliance
Southwest Regional Office
(337) 491-2808

From: Neil Clark <neil.c@ers-nbc.com>
Sent: Thursday, January 26, 2023 2:07 PM
To: Agueda Mayard <Agueda.Mayard@la.gov>
Cc: Jason Roy <Jason.Roy@LA.GOV>
Subject: ERS Update

EXTERNAL EMAIL: Please do not click on links or attachments unless you know the content is safe.

Agueda,

UPDATE:

~~I have made a couple of attempts to reach Carlette, if she is unavailable is there another small business assistance person I can reach out to?~~

I just saw your email, next week about Wednesday I will make a point to give you a ring, thank you.

I have reached out to Markel Farber (former DEQ) to assist me in the HW-1 Notification. I told him it was past 90 days since our inspection and we need to get the HW-1 submitted and we can correct it later.

He is also going to be my liaison between the Engineer and ERS for the SPCC plan

The totes that we cracked, leaking or risk of leaking have been sucked out and secured in a tank. The metal tank that was leaking has been sucked out, pads and most of the soils have been scraped up.

The used cooking oil platform area has been cleaned up, although more work needs to be done. We were able to combine all the cooking oil in 2 totes and it was pumped out by APEX Environmental out of Lafayette.

Two of the smaller portable tanks have been emptied and are to be cleaned and removed by next week.

We have profiles accepted for some of the waste drums and hope to have them transported and disposed of next week. TCLPs being done for the Grease Drums hope to have them gone in 15-20 days

None of the paint as of yet. I was waiting to do my HW-1 then apply for an episodic clean up.

There is probably more that I didn't mention, however I wanted to get some sort of an update to you. We are working, between jobs, to get this place back in tip top shape and in compliance. We have been able to get our lab back together and can now test and blend used oil at a faster rate. This will get rid of all the extra portable tanks. I will try and give you an update in about 3-4 weeks. By then I pray we will have an spcc plan and have an updated HW-1 Notification in, and be making a date for the episodic disposal.

Any questions please feel free to call me.

Neil Clark
 President / GM
 Environmental Response Services
 337.562.0001
 (m) 337-912-1580

Agueda Mayard

From: Agueda Mayard
Sent: Thursday, January 26, 2023 1:53 PM
To: 'Neil Clark'
Cc: Jason Roy
Subject: RE: opening up lines of communication

Hi Neil,

Thank you for reaching out. Carlette Wright recently parted ways with LDEQ. I am available for a call tomorrow or anytime next week. I am including Ella Barbe's information, as she is the Small Business Assistance contact. Ella.Barbe@la.gov or 337-491-2723.

Regards,

A. Elena Mayard

Environmental Scientist III
Louisiana Department of Environmental Quality
Office of Environmental Compliance
Southwest Regional Office
(337) 491-2808

From: Neil Clark <neil.c@ers-nbc.com>
Sent: Thursday, January 26, 2023 1:27 PM
To: carlette.wright@la.gov; Agueda Mayard <Agueda.Mayard@la.gov>
Cc: Jason Roy <Jason.Roy@LA.GOV>
Subject: RE: opening up lines of communication

EXTERNAL EMAIL: Please do not click on links or attachments unless you know the content is safe.

Carlette,

Good afternoon! I am reaching out to you to see if we can open up lines of communication? When would be a good time for us to have a telephone conversation? If there is someone else I should be talking with please forward me there contact information. See the below email string with reference to my initial request.

Neil Clark
President / GM
Environmental Response Services
337.562.0001
(m) 337-912-1580

Be Safe, Work Smart, Protect the Environment, Live Life!

From: Neil Clark
Sent: Monday, November 7, 2022 3:53 PM
To: carlette.wright@la.gov
Subject: FW: opening up lines of communication

Hi.

I wanted to bring this back to the top of your one million emails a day. I will look to connect with you this week.

Neil Clark

From: Neil Clark
Sent: Thursday, October 27, 2022 3:29 PM
To: carlette.wright@la.gov
Subject: opening up lines of communication

Hello Carlita

Today I was inspected by Elena Mayard and Jason Roy. I am opening up lines of communications because I will need some assistance on several areas.

1. Updating the HW1 Notification
2. Finding appropriate waste codes
3. SPCC Plans

As well as others

After several years of neglect and mismanagement our facility is a mess, and we have collected a bunch waste that we shouldn't have.

When you get the chance, get with Elena to get a copy of the report to read over and give me a call. My Mom is ill and I have been back and forth to Florida to help take care of her. Call me on my cell phone listed below at the signature line.

Neil Clark
President / GM
Environmental Response Services
337.562.0001
(m) 337-912-1580

Be Safe, Work Smart, Protect the Environment, Live Life!

Agueda Mayard

From: Agueda Mayard
Sent: Monday, October 31, 2022 9:55 AM
To: 'Neil Clark'
Subject: RE: Profiles for disposals

Good morning Neil,

Thank you for providing waste profiles for ERS. Please keep me updated on disposal activities at the site, including disposal manifests from what was onsite at the time of the inspection. I can include new information in the inspection report as its received until the report is finalized.

Regarding the two AI numbers for the facility, the department did a merge and the AI that will remain in use is AI # 29918.

Thank you,

A. Elena Mayard
 Environmental Scientist III
 Louisiana Department of Environmental Quality
 Office of Environmental Compliance
 Southwest Regional Office
 (337) 491-2808

From: Neil Clark <neil.c@ers-nbc.com>
Sent: Thursday, October 27, 2022 3:08 PM
To: Agueda Mayard <Agueda.Mayard@la.gov>
Subject: Profiles for disposals

EXTERNAL EMAIL: Please do not click on links or attachments unless you know the content is safe.

Here are the profiles for "oily solid waste" and our "oily water and bottoms"

I attempted to call Carlita and got her voice mail so I sent her an email. We already started to breaking down some of the issues you had written down into task items and plan to get started ASAP.

Neil Clark
 President / GM
 Environmental Response Services
 337.562.0001
 (m) 337-912-1580

Be Safe, Work Smart, Protect the Environment, Live Life!

AI No.: 29918
Alt. ID No.: LAR000026534

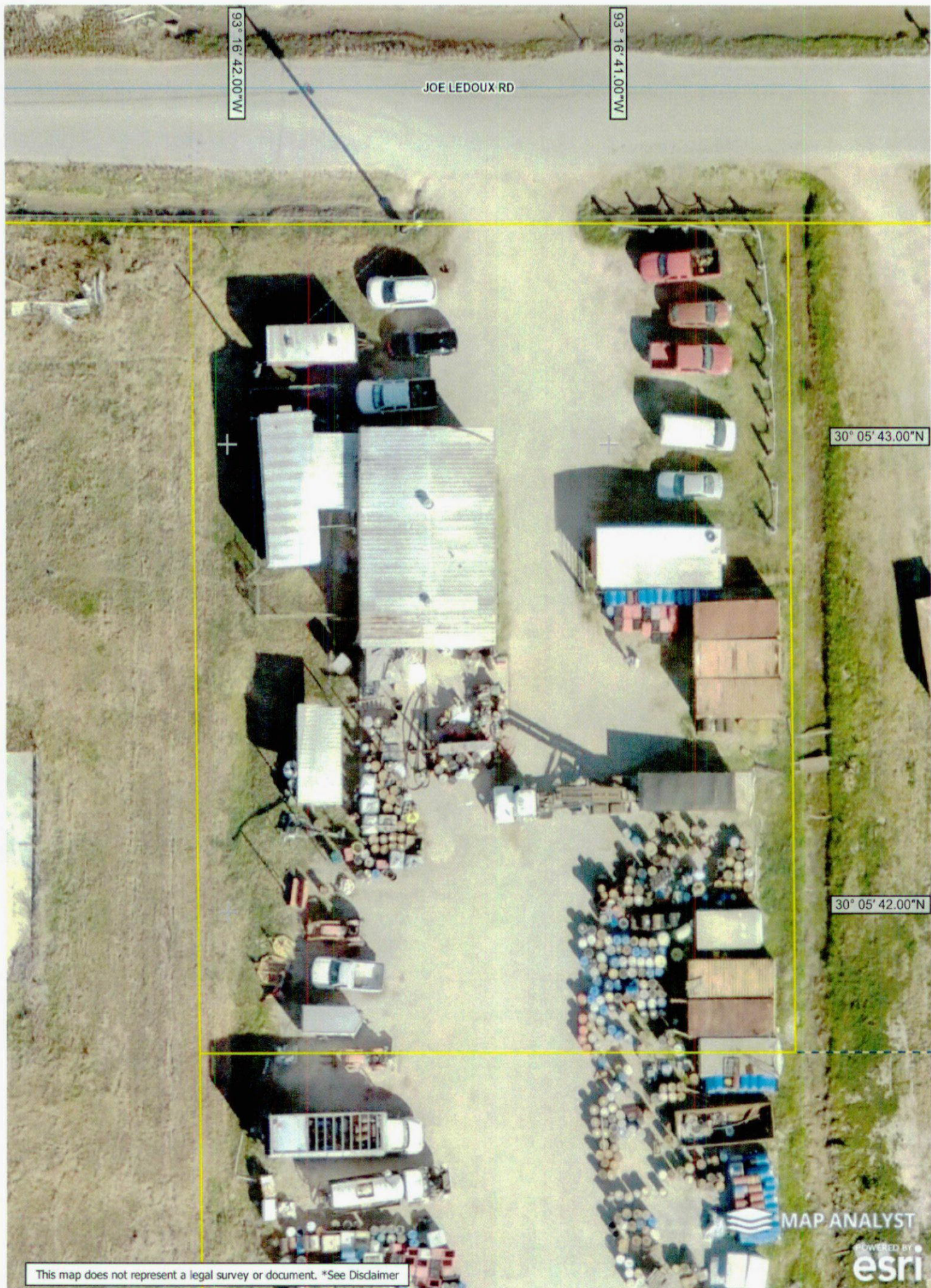
Facility Name: Environmental Response Services
Inspection Date: Oct. 24, 2022 – Oct. 27, 2022

ATTACHMENT 6

2022 Aerial Imagery (4 Pages)



Scalebar accurate at map center





This map does not represent a legal survey or document. *See Disclaimer

Scalebar accurate at map center



APPENDIX 3.
FOLLOW-UP EMAIL FROM ERS APRIL 18

RE: Follow-Up from EPA Inspection 4/16 (Environmental Response Services, Inc.

Neil Clark <neil.c@ers-nbc.com>

Thu 2024-04-18 4:44 PM

To: Cameron Tanaka <Cameron.Tanaka@erg.com>; Forress Clark <forress@ers-nbc.com>

Cc: Anshul Paripati <Anshul.Paripati@erg.com>; Pham, Elizabeth <Pham.Elizabeth@epa.gov>; Thapa, Sandesh <Thapa.Sandesh@epa.gov>; Joe Watson <Joe.Watson@erg.com>; Pandak, Debra (she/her/hers) <Pandak.Debra@epa.gov>; Ramrakha, Jayshika <Ramrakha.Jayshika@epa.gov>; kirby.brannan@la.gov <kirby.brannan@la.gov>

 6 attachments (14 MB)

Universal Waste Manifest # 54128, & Certificate of Recycling.pdf; Disposal Manifest Paint and Aerosol liq.pdf; Paint and Punctured Aerosol Can Liquids.pdf; Bay Area Gasket & Supply -Used Oil Manifest # 15890.pdf; Crowley Marine - Ocean Wind - Slops paper work.pdf; Spill report 8-28-2020.pdf;

CAUTION: Don't open links or attachments unless you recognize the sender and know they are safe.

See my comments in blue, of the the list of Items below

Neil Clark

337-912-1580

From: Cameron Tanaka <Cameron.Tanaka@erg.com>

Sent: Tuesday, April 16, 2024 7:06 PM

To: Neil Clark <neil.c@ers-nbc.com>; Forress Clark <forress@ers-nbc.com>

Cc: Anshul Paripati <Anshul.Paripati@erg.com>; Pham, Elizabeth <Pham.Elizabeth@epa.gov>; Thapa, Sandesh <Thapa.Sandesh@epa.gov>; Joe Watson <Joe.Watson@erg.com>; Pandak, Debra (she/her/hers) <Pandak.Debra@epa.gov>; Ramrakha, Jayshika <Ramrakha.Jayshika@epa.gov>; kirby.brannan@la.gov

Subject: Follow-Up from EPA Inspection 4/16 (Environmental Response Services, Inc.

Hello Neil and Forress,

I am following up with a list of items and notes from our inspection today. We would like you to send us:

- Your most recent universal waste manifest

[Attached in this email.](#)

- Your most recent hazardous waste aerosol manifest

[Attached in this email.](#)

- Your most recent spill response report (if there is one from the dye spill)

[Attached in this email is copy of the most recent spill report from DEQ. After an extensive search I saw no evidence of the dye spill report.](#)

Your most recent record of acceptance of used oil (this is one I did not think of during the inspection, so apologies for forgetting to mention it)

[Attached to this email is two manifest showing collection of used motor oil from a land based facility and one manifest from a vessel.](#)

The following areas of concerns will be handled in separate emails with pictures to demonstrate completion.

Additionally, we had the following observations. If you have any responses, clarification or documentation of corrective actions, we ask that you provide those to us as soon as possible, and we will incorporate those into the report (ideally within two weeks to be included in the report).

- Used oil containers throughout the site did not have secondary containment or labels in some cases.

- Hazardous waste aerosol residual accumulation drum was not secured or dated. [Drums secured, labeled and dated before end of day 4-16](#)
- Aerosol cans that were yet to be emptied were not treated as hazardous waste (no label, date, etc.). [Drum labeled and dated before end of day 4-16](#)
- A drum with aerosol cans yet to be emptied was not treated as hazardous waste (no label, date, etc.). [Drum labeled and dated before end of day 4-16](#)
- A spill was observed to be coming from a grease drum. Grease drum picked up during inspection and the area cleaned. [Contaminated soil was removed and placed in the roll off box with the rest of the oily solids for later disposal at Chemical Waste Management this was completed before end of day 4-16.](#)
- Soil contamination was observed next to/around the facility's washout pad.
- 40 buckets and 14 drums of potentially hazardous waste had been on site for over a year which needed waste determinations. Similarly, there were 3 drums of "soaps" that had been on site for about 6 years which needed waste determinations.
- General housekeeping - There were 3 blue drums that had material in them that could not be identified by facility personnel that potentially could contain hazardous waste and needed waste determinations.
- Used batteries were not dated or labelled. [Two pallets of Lead Acid batteries were labeled shortly after inspection and by end of day \(4-16 \) shipped off for scrap.](#)
- Flares were handled as universal waste, potentially containing flammable material that did not have waste determinations.
- 2 piles of expired lamps were not labelled and dated. [Expired Lamps were labeled and dated 4-17](#)

Again, thank you for taking the time out of your day to meet with us. Please let us know if you have any questions or concerns, or if you would like any guidance on how to work to address these observations. Any follow-up can be sent to myself, and the persons attached.

Thanks,
Cam

Cameron Tanaka (he/him)

Eastern Research Group, Inc.

cameron.tanaka@erg.com

Cell: (508) 314-6432

APPENDIX 4.
ERS UNIVERSAL WASTE MANIFEST

INVOICE

LEI, Inc
PO Box 550
Independence, LA 70443

Invoice #: INV-45818
Invoice Date: 11/07/2023
Due Date: 12/07/2023

Bill To:
Environmental Response Services Inc
P.O. Box 4288
Lake Charles, LA 70606
United States

Received From:
Environmental Response Services Inc.
8583 Joe Ledoux Road
Lake Charles, LA 70605
United States

Purchase Order #:101123SHOP NC Terms: Net 30 Charge Code:
Pickup Date: 10/27/2023 Shipping Document #: LEI54128 Vendor No.

Item	Description	Unit	Quantity	Unit Price	Amount
01-01	Fluorescent Lamps	Pound	533	\$0.92000	\$490.36
TRANS-01	Route Transportation	Each	1	\$280.00000	\$280.00
FUEL-01	Fuel Surcharge	Each	280	\$0.26000	\$72.80
Subtotal					\$843.16
Environmental Impact Fee					\$49.04
Discount					\$0.00
Total					\$892.20

This account has been assigned is payable to

First Business Specialty Finance, LLC

Please remit payment to:

First Business Specialty Finance
BN88912
Milwaukee, WI 53288-0912

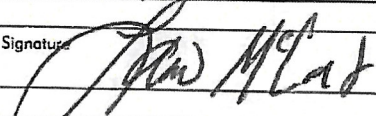
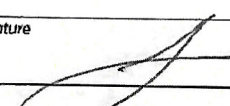
OR

Bank: First Business Bank, Madison WI, 53719
Account Name: First Business Specialty Finance, LLC
Routing Number: 075905787
Account Number: 090973200

Invoice Date: 11/07/2023	Terms: Net 30	Due Date: 12/07/2023	Customer Id: ENVIR-10		
Current	1-30	31-60	61-90	91-120	121-150
892.20	0.00	0.00	0.00	0.00	0.00
					151+
					0.00

Page 1



NON-HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. LAR0000026534	Manifest Document No.	2. Page 1 of 1	ER: 337-562-0001
3. Generator's Name and Mailing Address Environmental Response Services Inc. 8583 Joe Ledoux Road Lake Charles, LA, 70605			LEI 54128  LEI54128		
4. Generator's Phone (337-562-0001		6. US EPA ID Number LAR0000055467		A. Transporter's Phone 985-878-8210	
5. Transporter 1 Company Name LEI, Inc.		7. Transporter 2 Company Name		B. Transporter's Phone	
9. Designated Facility Name and Site Address LEI, Inc. 11441 Fontana Lane Independence, LA, 70443		10. US EPA ID Number LAR0000055467		C. Facility Phone # 985-878-8210	
11. Waste Shipping Name and Description			12. Containers		13. Total Quantity
			No.		Unit
1. Universal Waste Lamps - Non-DOT Regulated Material [Fluorescent Lamps] 4'			17 CF		200 P
2. Universal Waste Lamps - Non-DOT Regulated Material [Fluorescent Lamps] 8'			78 CF		150 P
3.					
4.					
D. Additional Description for Materials Listed Above 1) 5831-37527 (Fluorescent Lamps) 2) 5831-37527 (Fluorescent Lamps)			E. Handling Codes for Wastes Listed Above		
15. Special Handling Instructions and Additional Information ER: Neil Clark Or Bobby Huddleston 337-562-0001 SN65111					
16. GENERATOR'S CERTIFICATION: I certify the materials described above on this manifest are not subject to federal regulations for reporting proper disposal of Hazardous Waste. I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.					
Printed/Typed Name NEIL CLARK		Signature 		Month Day Year 10 27 23	
17. Transporter 1 Acknowledgement of Receipt of Materials Printed/Typed Name Loren McLeod		Signature 		Month Day Year 10 27 23	
18. Transporter 2 Acknowledgement of Receipt of Materials Printed/Typed Name		Signature		Month Day Year	
19. Discrepancy Indication Space					
20. Facility Owner or Operator: Certification of receipt of waste materials covered by this manifest except as noted in item 19.					
Printed/Typed Name JESSICA WHINKLES		Signature 		Month Day Year 10 27 23	



Certificate of Recycling / Disposal

LEI, Inc.
P.O. Box 2962
Hammond, LA, 70404
www.leirecycle.com

Phone: 985-878-3333
Fax: 985-590-5141
LAR000055467
LA0000365668

LEI, Inc. certifies that all waste materials accepted are recycled or disposed of in accordance with all applicable federal, state, and local regulations and within all regulated time periods.

Generator Information

Environmental Response Services Inc.
8583 Joe Ledoux Road
Lake Charles, LA 70605

Date Generator Shipped 10-27-2023

Manifest Tracking Number LEI54128

Date TSDF Received 10-27-2023

Material Accepted

Quantity	Unit	Item Name
533	LB	Fluorescent Lamps

Customer Name Environmental Response Services Inc

Environmental Solutions - Total Waste Management - Fully-Funded Closure Plan - RCRA / TSCA Permitted

APPENDIX 5.
ERS HAZARDOUS WASTE MANIFEST PAINT AND AEROSOL LIQUID



UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number LAR000026534	2. Page 1 of 1	3. Emergency Response Phone 337-562-0001	4. Manifest Tracking Number 018518582 FLE		
5. Generator's Name and Mailing Address ENVIRONMENTAL RESPONSE SVCS INC PO BOX 4288, LAKE CHARLES, LA, 70606-4288				Generator's Site Address (if different than mailing address) 8583 JOE LEDOUX RD, LAKE CHARLES, LA, 70605-0322			
Generator's Phone: 337-562-0001							
6. Transporter 1 Company Name ENVIRONMENTAL Response Services Inc				U.S. EPA ID Number LAR000026534			
7. Transporter 2 Company Name TRADEBE TRANSPORTATION, LLC				U.S. EPA ID Number INR000123497			
8. Designated Facility Name and Site Address TRADEBE TREATMENT & RECYCLING OF TH, LLC 5485 VICTORY LANE, HILLINGTON, TN, 38053				U.S. EPA ID Number TND000772186			
Facility's Phone: 901-353-5231							
GENERATOR	9a. HM	9b. U.S. DOT Description (Including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers		11. Total Quantity	12. Unit WL/Vol.	13. Waste Codes
			No.	Type			
	X	1. WASTE, UN1993, Flammable liquids, n.o.s. (TOLUENE, XYLENE), 3, PGIII (PAINT AND PUNCTURED AEROSOL CAN LIQUIDS)	12	IM	4800	P	OUTS 219H D001 D035
	X	2. WASTE, UN1993, Flammable Liquids NOS (TOLUENE, XYLENE) class 3 PGIII	2	OVER PACK DF	800	P	OUTS 219H D001 D035
		3. PAINT & PUNCTURED AEROSOL CAN LIQUID					
	4.						
14. Special Handling Instructions and Additional Information 1. 1000462116, ERG:128; 3887074 SO# 3082588 Job: 2023-12-33							
15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.							
Generator's/Offor's Printed/Typed Name NEIL CLARK				Signature 		Month Day Year 12/28/23	
INT'L	16. International Shipments ☐ Import to U.S. ☐ Export from U.S. Port of entry/exit: _____ Transporter signature (for exports only): _____ Date leaving U.S.: _____						
	17. Transporter Acknowledgment of Receipt of Materials						
TRANSPORTER	Transporter 1 Printed/Typed Name Denny Harris				Signature 		Month Day Year 12/29/23
	Transporter 2 Printed/Typed Name CESAR CASTILLO				Signature 		Month Day Year 12/29/23
DESIGNATED FACILITY	18. Discrepancy						
	18a. Discrepancy Indication Space ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection						
	Manifest Reference Number: _____						
	18b. Alternate Facility (or Generator)				U.S. EPA ID Number		
	Facility's Phone: _____						
18c. Signature of Alternate Facility (or Generator)						Month Day Year	
19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)							
1. H061 H141		2. H141		3. _____		4. _____	
20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a							
Printed/Typed Name Shewonda Buford				Signature 		Month Day Year 1/14/24	

DESIGNATED FACILITY TO EPA'S e-MANIFEST SYSTEM

LAND DISPOSAL NOTIFICATION FORM

Generator Name **Environmental Response SVCS INC**

EPA ID No. **LAR000026534**

Generator Address: **PO Box 4288, Lake Charles, LA, 70606-4288**

Manifest No. **018518582 FLE**

Identified below are the EPA hazardous waste codes applicable to this waste shipment as defined by 40 CFR 261, including the applicable subcategory.

This waste must be managed in accordance with 40 CFR 268.7 as indicated below:

Line No.	EPA Hazardous Waste Code(s)	Approval #	Subcategory Description	UHC(s)	Treatability Group	
					Wastewater	Non Wastewater
1	D001, D035	1000462116	High TOC subcategory	NA		X
2						
3						

☐ Restricted Waste Meets Treatment Standards (40 CFR 268.7(a) (3)) The restricted waste identified above meets the treatment standards in 40 CFR 268.40 or Alternative LDR treatment standards for contaminated soil 40CFR268.49 and can be landfill disposed without further treatment.

Restricted Waste Treated To Treatment Standards (40 CFR 268.7(b) (1) & 268.7 (b) (2)) The treatment residue, or extract of such residue, or the restricted waste identified above has been tested to assure that the treatment residues or extract meet all applicable treatment standards in 40 CFR 268.40 and/or performance standards in 40 CFR 268.45.

I certify under penalty of law that I personally have examined and am familiar with the treatment technology and operation of the treatment process used to support this certification. Based on my inquiry of those individuals immediately responsible for obtaining this information, I believe that the treatment process has been operated and maintained properly so as to comply with the treatment standards specified in 40 CFR 268.40 without impermissible dilution of the prohibited waste. I am aware there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment.

☐ Restricted Waste Soil Treated To Alternative Standards (40 CFR 268.7(b) (4)) I certify under penalty of law that I have personally examined and am familiar with the treatment technology and operation of the treatment process used to support this certification and believe that it has been maintained and operated properly so as to comply with treatment standards specified in 40 CFR 268.49 without impermissible dilution of the prohibited wastes. I am aware that there are significant penalties for submitting a false certification, including the possibility of a fine and imprisonment.

☐ Restricted Waste Decharacterized But Requires Treatment For UHC (40 CFR 268.7(b)(4)(iv)) I certify under penalty of law that the waste has been treated in accordance with the requirements of 40 CFR 268.40 or 268.49 to remove the hazardous characteristic. This decharacterized waste contains Underlying Hazardous Constituents that require further treatment to meet treatment standards. I am aware that there are significant penalties for submitting a false certification, including the possibility of a fine and imprisonment.

☒ Restricted Waste Subject To Treatment (40 CFR 268.7(a) (2)) The restricted waste identified above must be treated to the applicable treatment standards in 40 CFR 268.40, or treated to comply with applicable prohibitions set forth in Part 268.32 or RCRA Section 3004(d) and 268.49 (c).

☐ Hazardous Debris Subject To Treatment (40 CFR 268.45) This hazardous debris identified above must be treated to the alternative treatment standards in 40 CFR 268.45. I certify and warrant that the information that appears on this form, and appended documents, is true and correct. I have correctly indicated how my waste is to be managed in accordance with 40 CFR 268. My certification is based on personal examination of the information submitted or is based on my inquiries of those individuals responsible for obtaining the information.

I hereby certify that the information submitted is true, accurate, and complete to the best of my knowledge and information.

NEIL CLARK		PRESIDENT	12/28/23
Name	Authorized Signature	Title	Date

APPENDIX 6.
ERS PROFILE FOR PAINT AND AEROSOL LIQUID

**A. GENERATOR INFORMATION****SITE ADDRESS**

Generator #: 9100188717
Generator Name: Environmental Response Services
Generator Address: 8583 Joe Ledoux Rd
City: Lake Charles State: LA Zip: 70605
Contact Name: Neil Clark
Generator Phone: 337-562-0001
Generator Fax: _____
Generator Email: neil.c@ers-nbc.com
Generator USEPA / Federal ID #: LAR000026534
Generator State ID # (If applicable): _____
Generator NAICS Code: _____

CUSTOMER INFORMATION

Customer #: 1140005302
Customer Name: CCT Environmental, LLC
Customer Address: 16322 Avenue C
City: Channelview State: TX Zip: 77530
Contact Name: Louan Lewis
Customer Phone: 281-736-2895
Customer Fax: _____
Customer Email: louan@cctenviro.com
Customer Experience Rep: Andrea Burandt
Account Rep: Tabitha Cockburn

Mailing Address if different than Site Address

Mailing #: _____

Name: _____ Address: _____
City: _____ State: _____ Zip: _____

Please check if generator has "No Canada Disposal" Policy:

____ Yes

Please check if generator has "No Landfill" Policy:

____ Yes

Please list other disposal restrictions: _____

Facility restrictions (if Any): _____

B. WASTE STREAM INFORMATION

Generator's Waste Name: Paint and Punctured Aerosol Can Liquids

TX State Code (If applicable): OUTS219H

Describe Process Generating Waste (Flowcharts, if applicable):

Discarded paint waste from pun ctured paint cans after painti ng operations

Is this waste exempt from RCRA regulation?

____ Yes

Is this waste from a CERCLA cleanup site?

____ Yes

Waste determination was made by: X Testing X Generator Knowledge ____ SDS/MSDS ____ Sample ____ Other

(Attach analytical, SDS/MSDS or other supporting documentation used for waste determination)

Form Code: W219

Source Code: G11

Does the Waste have any other potential hazards?

____ Yes (If yes, list all that apply) X No

C. GENERAL CHARACTERICTICS

Color:	Physical State @70F	Phases	BTU/lb	pH	Liquid Flashpoint
<u>VARIES</u>	<u>Sludge</u>	<u>Double layer</u>	<u>5000-10000</u>	<u>4.1-10.0</u>	<u><73F</u>
<u>Odor: Mild</u>					
Boiling Point: <u>0</u> Specific Gravity: <u>0.00</u> Total Halogens: <u>0</u> % Total Organic Carbon(TOC): <u>0.00</u> % VOC: <u>85</u> % Viscosity: <u>0.00</u> cP					

D. CHEMICAL COMPOSITION

(Please Note, no "Trade Names" "Proprietary Ingredients" "Formulas" or "Name Reagents" are acceptable). All TRI chemicals must be included.

Chemical Name	Min	Max	Units	Ozone Depleting	EPCRA 313	Chemical of Interest (DHS)	UHC's above Treatment Standards
2-Butanone	0	5	%				X
Acetone	5	30	%			X	X
Barium	2.22	2.22	PPM		X		X
Butane	0	20	%		X	X	
Hexane	0	20	%		X		
Mineral Spirits	5	30	%				
Naphtha	0	30	%				
Oil Based Paint Solids	10	50	%				
Propane	0	20	%		X	X	
Toluene	5	30	%		X		X
Xylene	0	30	%		X		X

Does the Waste contain any of the following?

Nitrocellulose ☐ Yes ☒ No Metal Powder or Flake ☐ Yes ☒ No Sharps: ☐ Yes ☒ No
 Isocyanates ☐ Yes ☒ No Asbestos ☐ Yes ☒ No
 Metal pieces ☐ Yes ☒ No
 Reactive cyanide ☐ Yes ☒ No
 Reactive sulfide ☐ Yes ☒ No
 Hydrofluoric acid ☐ Yes ☒ No
 Nitric acid ☐ Yes ☒ No
 PCBs ☐ Yes ☒ No

Does this waste contain Benzene subject to Subpart FF Regulations? ☐ Yes ☒ No**E. OTHER WASTE STREAM INFORMATION**

Is this waste a USED OIL per 40CFR PART 279? ☐ Yes ☒ No
 Is the Waste subject to RCRA 40 CFR 264 & 265 SUBPART CC Subpart CC controls (Are volatile Organic Compounds > 500 PPM)? ☒ Yes
 Does this Waste contain any Hazardous Air Pollutants?(If so, please list in Section D, Chemical Composition) ☐ Yes
 Does the Waste contain any Class I or Class II ozone-depleting substances? ☐ Yes
 Does Waste contain EPCRA 313 chemicals identified in 40 CFR 372.65? ☒ Yes
 Does this waste contain any Chemicals of interest listed in 6 CFR Part 27 Appendix A (Department of Homeland Security)? ☒ Yes
 Does your waste contain any of the 172 per- and polyfluoroalkyl substances (PFAS)? ☐ Yes
 Click on link for FR list of 172 PFAS substances, <https://www.govinfo.gov/content/pkg/FR-2020-06-22/pdf/2020-10990.pdf>

F. RCRA CHARACTERIZATION

Is this a USEPA "Hazardous Waste" per 40CFR 261.3? ☒ Yes ☐ No
 Is this a "Universal Waste" per 40CFR part 273? ☐ Yes ☒ No
 Does treatment of this Waste generate a F006 or F019 sludge? ☐ Yes ☒ No
 Please list any characteristic codes (D001 - D043): D001,D035
 Does the Waste contain UHCs above treatment standards levels? (40 CFR 268.48, 268.7) ☐ Yes ☒ No
 Please list any applicable 'F' code:
 Please list any applicable 'K' code:
 Please list any applicable 'U' code:

Please list any applicable 'P' code:

Please list any state regulated codes:

G. SHIPPING VOLUME & FREQUENCY

Container Size

55 GALLON CONTAINER

Container Type

METAL

Is waste a combination package (e.g. Drum with inner containers or skid with cases of consumer products) ___ Yes ☒ No

Shipping Frequency: Number of Units: 10 Per ___ Month ___ Quarter ___ Year ___ One time

H. DOT SHIPPING INFORMATION

Is this a U.S. Department of Transportation (USDOT) Hazardous Material?

☒ Yes ___ No

Shipping Name per 49 CFR 172.101 Hazardous Materials Table:

UN1993 WASTE FLAMMABLE LIQUIDS, N.O.S. (toluene, xylene) 3 III

Primary Hazard Class or Division: 3

UN/NA#: UN1993

Packing Group: ___ I ___ II ☒ III

Secondary Hazard Class or Division: _____

ERG#: 128

Technical Descriptors, if required: toluene, xylene

RQ, if required:

DOT Special Permit that may apply (include copy of permit): _____ Inhalation Hazard: Zone _____

I. GENERATOR CERTIFICATION

My authorized signature certifies the information contained in the Profile and the attached is complete and accurate, so there are no omissions of characteristics, composition or properties existing and all known or suspected hazards have been disclosed and that all shipments/samples referencing the profile number assigned to the waste stream described herein shall in all respects be consistent with the description. I further certify that I will notify Tradebe by email/letter of any characterization, chemical/process changes to the waste stream contained in the Profile prior to shipping. If signature is not by the Generator it is by the Generator's authorized agent.

Name(Print): _____

Title: _____

Signature: _____

Date: _____

INTERNAL USE ONLY: Please indicate which Tradebe Facility(s) are being utilized for this profile

East Chicago,IN

Millington,TN

Wisconsin,WI

APPENDIX 7.
ERS RECEIPT OF USED OIL FROM LAND-BASED FACILITY

APPENDIX 8.
ERS MOST RECENT SPILL RESPONSE REPORT

05/20/2021

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

Page 1 of 2

INCIDENT REPORT

Incident:198491

Incident Description**Incident Type:** Complaint, Miscellaneous**Incident Date:** 08/28/2020 00:00:00**Parish:** Calcasieu**Municipality:** Lake Charles**Location:** Joelebois Rd.**Lat/Lon:** /**Basin/Segment:****Substance(s):****Media Impacted:** Soil**Incident Desc:** c20-151657 After storm, Environmental Response Services had big red trash cans marked medical waste that have a coroner's tag with 7/22/20. Unknown oils have also been released in area. LB**Incident Status****Lead Investigator:** Leslie Taylor **Incident Region:** Southwest**Incident Status:** Closed**Followup Status:** Closed**As Of:** 05/20/2021 11:08:17

GHW 5/25/2021

Incident Reporter 1**Received By:** Spo Contact**Received Date:** 09/02/2020 17:21:00**Dispatch Number(s):** c20-151657**Reported By:****Phone:****Reporter Title:****Organization:****Address:****Municipality:****State:****Zip Code:****Comments:**

05/20/2021

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

Page 2 of 2

INCIDENT REPORT

Incident:198491

Incident Source 1**Source Name:** Environmental Response Services Inc**Address:** 8583 Joe Ledoux Rd**Municipality:** Lake Charles**State:** LA**Phone:** 3375620001(Work phone number)**Parish:****AI #:** 29918**Related Permits:**

Comments: Received an anonymous complaint for Environmental Response Services office/yard locations at 8635 Joe Ledoux Rd., Lake Charles. Nick Bent and I made a site visit on 9/7/2020. We observed hundreds of drums with oily waste, a tank that collapsed during Hurricane Laura, causing an oily residue to be spilled. We noticed piles of waste tires and empty medical waste containers. Made a site visit on 9-14-2020 and spoke with Forress Chapel (manager). She stated that Hurricane Laura caused all of the spilling and that they will get it cleaned up. I told her that the 55 gallon drums and storage tanks needed to be in a containment area and have lids. I spoke with Neil Clark on 10-1-2020. He stated that the waste oil is a virgin gear oil and is not hazardous. He stated that the oil in the ditches were cleaned with absorbent pads and the ground will be scrapped. The drums contained solid waste (oily rags). The drums filled with water once the lids blew off during Hurricane Laura. He said the site will be cleaned as soon as he can. Made a site visit on 4/2021. The facility has been cleaned and the owner is still in the process of disposing of containers holding oily waste. LDT

05/20/2021

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

Page 2 of 2

INCIDENT REPORT

Incident:198491

Incident Source 1**Source Name:** Environmental Response Services Inc**Address:** 8583 Joe Ledoux Rd**Municipality:** Lake Charles**State:** LA**Phone:** 3375620001(Work phone number)**Parish:****AI #:** 29918**Related Permits:**

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Jimbo Earles

From: SPOC <spoc.otrs@la.gov>
Sent: Thursday, September 03, 2020 9:44 AM
To: _DEQ-AROAdmin
Cc: _DEQ-SWROAdmin
Subject: [Incident#20151657] SWRO c20-151657 T 198491 Unknown material Calcasieu LSP 20-03379
Attachments: SWRO c20-151657 T 198491 Unknown material Calcasieu LSP 20-03379.msg

SPOC
 Louis Berner

--
 Louisiana Department of Environmental Quality
 Single Point Of Contact
 Phone: (225) 219-3640
 Fax: (225) 219-4044
 --

--- Forwarded message from Dana.Hart@dps.la.gov ---

From: Dana.Hart@dps.la.gov
 To: spoc@la.gov
 Subject: LSP Hazardous Material Incident Incident # 20-03379
 Date: 2020-09-02 17:21:06

THIS ELECTRONIC CORRESPONDENCE CONTAINS INFORMATION THAT IS PRIVILEGED, LAW ENFORCEMENT SENSITIVE, OR SUBJECT TO OTHER DISCLOSURE LIMITATIONS. SUCH INFORMATION SHOULD NOT BE FURTHER DISSEMINATED WITHOUT THE PRIOR APPROVAL OF THE LOUISIANA STATE POLICE. IF YOU HAVE RECEIVED THIS E-MAIL IN ERROR, DO NOT KEEP, USE, DISCLOSE, OR COPY; NOTIFY THE SENDER IMMEDIATELY AND DELETE.

INCIDENT # 20-03379 SOURCE: STATE POLICE HAZMAT HOTLINE
 877-925-6595 / 225-925-6595

** (INITIAL REPORT) DATE AND TIME *****
 HOTLINE NOTIFIED: 09/02/20 16:27
 INCIDENT DISCOVERED: 08/28/20 00:00

** (INITIAL REPORT) INCIDENT LOCATION *****
 PARISH: Calcasieu
 ADDRESS: Joelebox Rd.
 CITY: Lake Charles

** (INITIAL REPORT) CALLER INFORMATION *****
 CALLER'S NAME: Anonymous
 CALLER'S ADDRESS OR EMPLOYER: Private Citizen

** (INITIAL REPORT) RESPONSIBLE PARTY *****
 NAME: Environmental Response Services
 MAILING ADDRESS: 8583 Joelebox Rd.
 CITY,STATE,ZIP: Lake Charles, LA 70605

** (INITIAL REPORT) DETAILS *****
 Allegedly DEQ Supervisor Scott Wilkinson has been made aware of similar incidents prior to Hurricane Laura but has neglected situation... Situation has become worse because of Hurricane Laura... After storm, Environmental Response Services had big red trash cans marked medical waste that have a coroner's tag with 7/22/20... Unknown oils have also been released in area... Neil Clark/Environmental Response Services left

~~152910~~
 AI # 29918
 Neil Clark
 337-562-0001 - owner

town, and left contaminants on others' property... Residents rely on ground water and water is black and filthy which may be from oil spilling out... Stench can be smelled on property... Mr. Clark arrived back in town 09/02/2020 and started hurriedly hauling stuff out today to remove it... Caller believes it is not being properly disposed of... DEQ not aware of this facility having medical waste... LDEQ not providing inspections of medial waste portion...

** (INITIAL REPORT) CHEMICAL INFORMATION *****

CHEMICAL 1: Medical Waste

QTY: Unk

RELEASED STATE: N/A CLASS: ORM ID: EHS: No

CHEMICAL 2: Unknown Oil

QTY: Unk

RELEASED STATE: Liquid CLASS: ID: EHS:

** (INITIAL REPORT) RELEASE INFORMATION *****

INCIDENT CLASSIFICATION: Unusual Event

DID MATERIAL GO OFFSITE? Yes

RELEASED TO: See details

ANY OFF-SITE PROTECTIVE ACTION?

ROAD CLOSURE: Unk

SHELTER IN PLACE: Unk

EVACUATION: Unk

RELEASE EFFECTS:

FIRE: No

INJURIES: No :

FATALITIES: No :

** (INITIAL REPORT) FIXED SITE *****

See details

--- End forwarded message ---

Neil Clark.

Biomed. Wst. - Port Arthur tx.

Paragon - incinerated waste.

Water sealed

Gear oil Virgin

Drums - Solid Waste

W/ST Ditch - used Blum oil will scrap

Adjoining property - S1

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY
FIELD INTERVIEW FORM

AGENCY INTEREST#: 29918 INSPECTION DATE: 9-14-20 TIME OF ARRIVAL: 10:00 AM
 ALTERNATE ID#: LAC34851 DEPARTURE DATE: 9-14-20 TIME OF DEPARTURE: 11:00 AM
 (ID Type/Number)
 FACILITY NAME: Environmental Response Service PHONE #: (337) 502-0001
 LOCATION: 8583 Joe Leche Rd
Lake Charles, LA PARISH: Calcasieu
 RECEIVING STREAM (BASIN/SUBSEGMENT): _____
 MAILING ADDRESS: PO Box 4288 Lake Charles 70606
 (Street/P.O. Box) (City) (State) (Zip)
 FACILITY REPRESENTATIVE: Neil Chub TITLE: Owner
 FACILITY REPRESENTATIVE PHONE NUMBER: 337-912-1580
 NAME, TITLE, ADDRESS and TELEPHONE of RESPONSIBLE OFFICIAL (if different from above):
SA

INSPECTION TYPE: Complaint PROGRAM INVOLVED: AIR ☐ WASTE ☐ WATER ☒ OTHER: _____
 INSPECTOR'S OBSERVATIONS: (e.g. AREAS AND EQUIPMENT INSPECTED, PROBLEMS, DEFICIENCIES, REMARKS, VERBAL COMMITMENTS FROM FACILITY REPRESENTATIVES)

- Received anonymous complaint on 9-3-2020 about smelly contaminants on ERS property.
- Made a site visit on 9-10-20 & 9-14-20.
- Site has only water drums that were spilled during Hurricane Laura.
- Only waste is in ditches ~~and~~ inside of papers on property.
- Jones Chapel stated that they will clean it.

AREAS OF CONCERN:

REGULATION	EXPLANATION	CORRECTED?
_____	_____	YES ☐ NO ☐
_____	_____	YES ☐ NO ☐
_____	_____	YES ☐ NO ☐

PHOTOS TAKEN: YES ☒ NO ☐SAMPLES TAKEN: YES ☐ NO ☒ (Attach Chain-of-Custody)RECEIVED BY SIGNATURE: Jones Chapel

PRINT NAME: _____

(NOTE: SIGNATURE DOES NOT INDICATE AGREEMENT WITH INSPECTOR'S NOTES)

INSPECTOR(S): Jarvis Taylor

CROSS REFERENCE: _____

REVIEWER: [Signature]ATTACHMENTS: 1

NOTE: The information contained on this form reflects only the preliminary observations of the inspector(s). It should not be interpreted as a final determination by the Department of Environmental Quality or any of its officers or personnel as to any matter, including, but not limited to, a determination of compliance or lack thereof by the facility operator with any requirements of statute, regulations or permits. Each day of non-compliance constitutes a separate violation of the regulations and/or the Louisiana Environmental Quality Act.

APPENDIX 9.
ERS RECEIPT OF USED OIL FROM VESSEL

P.O. BOX 4288, LAKE CHARLES, LA 70606
(337) 562-0001

DATE: 3-28-24

#

**JOB
COMPLETE**

JOB TO BE
CONTINUED

240176

CUSTOMER: Cowley Marine

CONTACT:

PHONE:

LOCATION/VESSEL: Port of Orange, Ocean Wind

JOB DESCRIPTION: Suck out Slops

START	ARRIVE		LEAVE		END
0800	1000		1230		1325

5.5 HR.	VAC TRUCK (80 BBL)	V4
---------	--------------------	----

HR	ROLL OFF
----	----------

DY	BOX VAN
----	---------

2	DY	VAN / LIGHT TRUCK	2 Door
---	----	-------------------	--------

DY	VAN / LIGHT TRUCK
----	-------------------

90'	FT	2" HOSE
-----	----	---------

FT	3" HOSE
----	---------

DY	PUMP 1" GAS
----	-------------

DY	PUMP 2" AIR
----	-------------

DY	SUBMERSIBLE PUMP
----	------------------

DY	COLD PRES. WASHER
----	-------------------

DY	HOT PRES. WASHER
----	------------------

FT	PRESSURE WASH HOSE
----	--------------------

DY	AIR COMPRESSOR
----	----------------

FT	AIR HOSE
----	----------

FT	GARDEN HOSE
----	-------------

DY	LIGHTS
-----------------------------------	---------------------------------------

EA	LEL METER
----	-----------

1

EA	GLOVES
----	--------

EA	COVERALL
----	----------

PERSONNEL

[illegible]

Notes

OTHER TICKETS:

MANIFEST #

CUSTOMER PRINT: Steven L. Johns C/E

SIGN:

DATE: 3-28-24

15877

☒ USED OIL, OILY WASTE, WATER, SLUDGES, LIQUIDS, ETC.

☐ OIL/FUEL CONTAMINATED SOLIDS

☐ USDA / MARPOL REGULATED GARBAGE AND FOREIGN WASTE

Crowley Marine (Ocean Wind)
Port of Orange
Orange, Texas.

EPA ID #

USED OIL OR OILY WASTE: AVOID CONTACT WITH SKIN WEAR GLOVES AND COVERALLS WHILE HANDLING. MATERIAL MEETS THE DESCRIPTION OF USED OIL/FUEL REGULATIONS SET BY EPA IN CFR40 PART 279 AND LA-DEQ IN LAC TITLE 33 CHAPTER 40. USED OIL AND OILY WASTE ARE PICKED UP FOR RECYCLING.

USDA / MARPOL WASTE: MATERIAL IS GARBAGE SUBJECT TO REGULATION BY THE US DEPT. OF AGRICULTURE. MATERIAL MAY BE FROM FOREIGN LAND OR VESSELS, OR BE UNDER QUARANTINE DIRECTIVES. WASTE IS ONLY TO BE DISPOSED OF AT A FACILITY APPROVED BY THE USDA.

FOR EMERGENCY OR SPILL 1-800-322-1668

WASTE DESCRIPTION	CONTAINERS		TOTAL QUANTITY	UNIT - WT./VOL.
	QTY	TYPE		
Waste Oil	1	TT	741	gal.

GENERATORS CERTIFICATION: I hereby certify that the contents of this shipment are fully and accurately described and are in all respects in proper condition for transport. I further certify the waste/reuse material does not contain any paint waste, thinners, solvents, cleaners, PCB's or other material which may be hazardous. The materials described on this manifest are not subject to federal hazardous waste regulations.

X Steven L. Johns

PRINT

X _____
SIGNATURE

3/28/2
DATE

TRANSPORTER

ENVIRONMENTAL RESPONSE SERVICES

P.O. BOX 4288 LAKE CHARLES, LA 70606-4266

337-562-0001

US EPA LAR000026534

LA DEQ T-019-11413

USDA Materials may be handled by National Bio-CARE
a division of Environmental Response Service.

I acknowledge receipt of the above materials for transport to the below facility.

Shannon Sargent
PRINT

PRINT

DATE _____

FACILITY

**ENVIRONMENTAL
RESPONSE SERVICE, INC.
8583 JOE LEDOUX RD.
LAKE CHARLES, LA 70605
LAR000026534**

DISCREPANCIES:

Facility Owner or Operator; Certification of receipt of the materials covered by this manifest except as noted in discrepancy space.

PRINT

DATE _____

TICKET / SLIP

CUSTOMER INFO

PO/RSO

SITE/VESSEL

S. Lannon - V4
DJ & Taylor - 12dr
A - 12:00
S - 12:00
S - 12:15
L - 12:30

START

END 13:30

UNIT

UOM

DEA

90 ft 2" hose

Appendix 9 Page 3 of 4

DECLARATION OF INSPECTION
PRIOR TO BULK CARGO TRANSFER

VESSELS

PRODUCT

TRANSFER FACILITY

LOCATION

Ocean Wind (crowley marine)
Slop.

Slope

V-4 Environment Response Services.

Port of Orange.

The following list refers to requirements set forth in detail in 33 CFR 156.150 and 46 CFR 35.35-30 (printed on reverse). The spaces adjacent to items on the list are provided to indicate that the detailed requirement has been met.

1. Quantity to be Received /Delivered _____
2. Communication System /Language Fluency (154.120) (m) (o)
3. Warning Signs and red Warning Signals. (35.35-30)
4. Vessels Moorings. (156.120(a))
5. Transfer System Alignment. (156.120(d))
6. Transfer System; unused components. (156.120(e))
7. Transfer Systems; fixed piping. (156.120(f))
8. Overboard Discharges / Sea Suction Valves. (156.120(g))
9. Hoses or Loading Arms condition. (156.120(h) (156.170))
10. Hoses; length and support. (156.120(b) (c))
11. Connections. (156.120(n))
12. Discharge Containment System. (156.120 (j) (i))
13. Scuppers or Drains. (156.120(k))
14. Emergency Shutdown (156.120(t))
15. Repair Work Authorization. (35.35-30)
16. Boiler and Galley Fires Safety. (35.35-30)
17. Fires or Open Flames (35.35-30)
18. Lightning (sunset or sunrise) (156.120 (q))
19. Safe Smoking Spaces. (35.35-30)
20. Spill and Emergency Shutdown procedures. (156.120 (q))
21. Sufficient Personnel. (156.120 (o) (s))
22. Transfer Conference. (156.120 (r))
23. Agreement to begin transfer. (156.120 (r))

DELIVERER	RECEIVER
	
	
	
	
	
	
	
	
	
	
	
	
	
	
	
	

I do certify that I have personally inspected this facility or vessel with reference to the requirements printed on reverse and that opposite each of them I have indicated that the regulations have been complied with.

Person in Charge Delivering Unit

Steven M. Johns

Person in Charge Receiving Unit

TITLE

C/F

Operator

TIME & DATE

10:00 ~~3/28/2~~

10:00 3/25/24

TIME COMPLETED

12:15

APPENDIX 10.
FOLLOW-UP EMAIL FROM ERS APRIL 25

FW: 4-16 inspection at ERS LAke Charles

Neil Clark <neil.c@ers-nbc.com>

Thu 2024-04-25 11:32 PM

To: Cameron Tanaka <Cameron.Tanaka@erg.com>

Cc: Neil Clark <neil.c@ers-nbc.com>; Forress Clark <forress@ers-nbc.com>; Anshul Paripati <Anshul.Paripati@erg.com>; Thapa, Sandesh <Thapa.Sandesh@epa.gov>; Joe Watson <Joe.Watson@erg.com>; Pandak, Debra (she/her/hers) <Pandak.Debra@epa.gov>; Ramrakha, Jayshika <Ramrakha.Jayshika@epa.gov>; kirby.brannan@la.gov <kirby.brannan@la.gov>

 2 attachments (1 MB)

3 drums for areosol can management.jpg; paint and paint related waste drum.jpg;

CAUTION: Don't open links or attachments unless you recognize the sender and know they are safe.

I noticed this email never sent so my apologizes .

EPA Inspection 4-16-24
@ Environmental Response Service
Lake Charles LA

Hello Cameron and Anshul

Thank you for taking my call the other day on Friday (4-19-24). I am following up with an email about some things we talked about.

In your email to Environmental Response Services listing the observations during the April 16, 2024 inspection, the following highlighted areas were the focus of our conversation.

- Hazardous waste aerosol residual accumulation drum was not secured or dated.
- Aerosol cans that were yet to be emptied were not treated as hazardous waste (no label, date, etc.).
- A drum with aerosol cans yet to be emptied was not treated as hazardous waste (no label, date, etc.).
- Flares were handled as universal waste, potentially containing flammable material that did not have waste determinations.

First off were the Flares or pyrotechnics. I have made some initial phone calls to some maritime academies in Texas and Louisiana, and there is some in Interest in taking the expired flares and ship emergency indicators for training within their classes.

Also, the main purpose for my call was to speak about the 4 drums located underneath the cover, which is my hazardous material storage area.

The one drum, which is blue to the right when inspected, did not have the lid securely closed or label on it. This drum contains paint and paint related waste from non-aerosol can generation. This is paint and thinner from emptying paint cans and jugs of paint thinner. See attached pictures

The other 3 drums, that were noted in the picture are related to aerosol can management. From left to right, the left drum is where we put the unpunctured cans until we get a chance to puncture them. The center drum is a closed top drum with the aerosol can puncturing device

and vapor filter installed. This center drum is where we puncture our aerosol cans and retain the liquids until ready for disposal. The third drum labeled non-regulated are the aerosol cans which have been punctured, drained, and empty. See the attached pictures

Thank you for taking the time to discuss these and allow me to offer clarification as to the observations that were made during the April 16th. visit with your team and EPA and DEQ.

Neil Clark
President / GM
Environmental Response Services
337.562.0001
(m) 337-912-1580

Be Safe, Work Smart, Protect the Environment, Live Life!

Neil Clark

Environmental Response Services:
Marine and Land Based Environmental Clean Ups and Disposal
www.ers-nbc.com

National BioCARE:
Medical Waste Disposal - Trauma Scene Cleaning - Deceased Transports
www.nationalbiocare.com

APPENDIX 11.

PHOTO OF WASTE PAINT DRUM IN FOLLOW-UP EMAIL FROM ERS APRIL 25



APPENDIX 12.

PHOTO OF AEROSOL CAN MANAGEMENT DRUMS IN FOLLOW-UP EMAIL FROM ERS APRIL 25

