

INSPECTION REPORT

Inspection Entry Date/Time	11/4/2024 14:00 (CT)	Announced: No (tenants and related facilities)		
Inspection Exit Date/Time	11/4/2024 14:55 (CT)	Access: Granted		
Regulatory Program	RCRA			
Type of Inspection	Focused Compliance Inspection (FCI)			
Facility or Site Name	SSA Marine			
Facility/Site Identifier	N/A			
Facility/Site Physical Address	1355 Wallace St.			
City, State, Zip Code	Beaumont, TX 77701			
County/Borough	Jefferson County			
Generator Status	Non-generator			
NAICS	488320			
Type of Operation	SSA Marine is a facility that offloads bulk cargo from ships and loads them onto trucks and railcars for delivery.			
Geographic Coordinates	30.07391, -94.08275			
Additional Persons Participating in Inspection:				
Name	Title	Organization	Email	Phone
Angela Hays	Inspector	EPA REGION 6	Hays.Angela@epa.gov	(214) 665-2285
Sandesh Thapa	Inspector	EPA REGION 6	Thapa.Sandesh@epa.gov	(214) 665-2265
Jon Herbay	Contractor	Eastern Research Group (ERG)	Jon.Herbay@erg.com	(412) 780-9931
Lead Inspector:				
Vince Damiano	Chemical Engineer			02/06/2025
	ERG	Vince.Damiano@erg.com		(703) 633-1732

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

The Port of Beaumont 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 Environmental Protection Agency (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	Vince Damiano	(703) 633-1732	Vince.Damiano@erg.com	Yes	Yes
Inspector/Enforcement Officer/EPA Region 6	Angela Hays	(214) 665-2285	Hays.Angela@epa.gov	Yes	Yes
Inspector/Enforcement Officer/EPA Region 6	Sandesh Thapa	(214) 665-2265	Thapa.Sandesh@epa.gov	Yes	Yes
RCRA Inspector/ Contractor/ERG	Jon Herbay	(412) 780-9931	Jon.Herbay@erg.com	Yes	Yes
SSA Marine	Jana Watson	(409) 988 8189	Jana.Watson@ssamarine.com	Yes	Yes

Facility General Description

Tenant/Area	Inspection Date	Process Description	Area of Concern
SSA Marine	11/04/24	SSA Marine (SSA) is a stevedore facility that offloads steel billets from ships and loads them onto trucks and railcars. Their facility is covered under Port of Beaumont's MARPOL COA for Annexes I and V.	Yes

SECTION II – OBSERVATIONS

Tenant: SSA Marine			
Section: 2.1	Date: 11/04/24, 02:00 PM	Contains AOC: Yes	Contains CBI: No
Lead Inspector: Vince Damiano	Attendees: Jana Watson (SSA Safety Manager)		

SSA is located within the Port of Beaumont and operates as a stevedore, loading and unloading cargo from vessels. The cargo SSA handles consists primarily of steel billets, pulp paper, and project cargo. SSA used forklifts and yard trucks to move cargo. Any cranes they may use to conduct their operations are owned and maintained by the Port of Beaumont. SSA will have a mechanic come from the Port Arthur location to conduct maintenance on equipment. Any used oil from maintenance activities is drummed up and brought back to the Port Arthur location and added to their used oil storage. SSA is covered under Port of Beaumont’s MARPOL COA, but Ms. Watson stated they do not remove trash or waste from vessels. However, SSA may remove dunnage from vessels. SSA is considered a non-generator of hazardous waste.

Following the opening conference, the inspection team conducted a visual inspection of SSA’s Maintenance Garage where SSA repairs their trucks and forklifts and stores equipment. The inspection team first observed two used lead-acid batteries (see Appendix 1 – Photos 1 to 2). The batteries were not labeled as universal waste. The inspection team asked Jana Watson if they knew the accumulation start date of the used batteries. Ms. Watson was not sure but said a vendor swaps the batteries out several times throughout a year; no BOLs or receipts were provided following the inspection [**AOC #1** – *SSA did not label batteries being managed as universal waste properly or store the batteries in a properly labeled container – 40 CFR 273.14(a)*]. Next, the inspection team observed a 55-gallon drum of used antifreeze in the back corner of the maintenance garage that was approximately half full (see Appendix 1 – Photos 3 and 4). Ms. Watson stated the used antifreeze is sent for recycling at Action Oil once SSA fills the drum. The inspection team noticed the funnel on top of the drum was not plugged and suggested the drum of antifreeze should remain closed when not in use to minimize the potential for a release. The inspection team walked through the storage yard and did not observe any other areas of concern (AOCs).

The inspection team did not observe other AOCs at the time of the inspection. However, further EPA review may change or add to their potential AOCs. A closing conference was conducted at approximately 2:55 PM with SSA personnel. The AOCs were communicated during the closing.

SECTION III – RECORDS REVIEW

No RCRA-regulated records were reviewed during this focused onsite inspection.

SECTION IV – AREAS OF CONCERN

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

Tenant: SSA Marine		
AOC #1 – SSA did not label batteries being managed as universal waste or store the batteries in a container labeled as “Universal Waste—Battery(ies), “Waste Battery(ies),” or “Used Battery(ies).”	Citation: 40 CFR 273.14(a)	Section: 2.1

SECTION V – FOLLOW UP**Follow-Up**

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

SECTION VI – LIST OF APPENDICES

Appendix 1. Photograph Log

APPENDIX 1.
PHOTOGRAPH LOG



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Location: SSA Marine		
City: Beaumont	County/Parish: Jefferson	State: Texas



Photo No. 1

Photo File Name: DSCN7651

Date of Photo: 11/04/2024

Time of Photo: 14:56 hrs.

Photographer: Vince Damiano

Description: An unlabeled lead-acid battery was found on top of a 5-gal container inside the Maintenance Garage.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Location: SSA Marine		
City: Beaumont	County/Parish: Jefferson	State: Texas



Photo No. 2

Photo File Name: DSCN7652

Date of Photo: 11/04/2024

Time of Photo: 14:56 hrs.

Photographer: Vince Damiano

Description: An unlabeled lead-acid battery was found on top of a plastic drip pad inside the Maintenance Garage.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Location: SSA Marine		
City: Beaumont	County/Parish: Jefferson	State: Texas



Photo No. 3

Photo File Name: DSCN7653

Date of Photo: 11/04/2024

Time of Photo: 14:57 hrs.

Photographer: Vince Damiano

Description: View of a 55-gal drum containing used antifreeze that was approximately half full inside the Maintenance Garage.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Location: SSA Marine		
City: Beaumont	County/Parish: Jefferson	State: Texas



Photo No. 4

Photo File Name: DSCN7654

Date of Photo: 11/04/2024

Time of Photo: 14:57 hrs.

Photographer: Vince Damiano

Description: View of the funnel on the 55-gal used anti-freeze container that was not plugged or closed.