

INSPECTION REPORT

Inspection Entry Date/Time	4/18/2024 01:35 PM (CT)	Announced: No		
Inspection Exit Date/Time	4/18/2024 04:15 PM (CT) Closing Conference	Access: Granted		
Regulatory Program	RCRA			
Type of Inspection	Focused Compliance Inspection (FCI)			
Facility or Site Name	C-Port 2, LLC			
Facility/Site Identifier	LAR000054155			
Facility/Site Physical Address	180 1 st St			
City, State, Zip Code	Golden Meadow, LA 70357			
County/Borough	Lafourche Parish			
Generator Status	Very Small Quantity Generator (VSQG)			
NAICS	<u>213112, 488320</u>			
Type of Operation	Support Activities for Oil and Gas Operations, Marine Cargo Handling			
Geographic Coordinates	29.122243, -90.196405			
Mailing Address/Secondary Address	N/A			
City, State, Zip Code	N/A			
Permit Number (If Applicable)	Not Applicable			
Additional Persons Participating in Inspection:				
Name	Title	Organization	Email	Phone
Joyce Johnson	Inspector	EPA Region 6	Johnson.Joyce-r6@epa.gov	(214) 665-8548
Dedriel Gardner	Inspector	EPA Region 6	Gardner.Dedriel@epa.gov	(281) 983-2133
George Wieber	Contractor	Eastern Research Group (ERG)	George.Wieber@erg.com	443-883-5253
Lead Inspector:				
Brook McKeown				9/11/2024
	ERG		Brook.McKeown@erg.com	(410) 459-5811

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

Port Fourchon 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/ Contactor/ERG	Brook McKeown	(410) 459-5811	Brook.McKeown@erg.com	Yes	Yes
RCRA Inspector/ Contractor/ERG	George Wieber	443-883-5253	George.Wieber@erg.com	Yes	Yes
Inspector/Enforcement Officer/EPA Region 6	Joyce Johnson	(214) 665-8548	Johnson.Joyce-r6@epa.gov	Yes	Yes
Inspector/Enforcement Officer/EPA Region 6	Dedriel Gardner	(281) 983-2133	Gardner.Dedriel@epa.gov	Yes	Yes

Facility General Description

Tenant/Area	Inspection Date	Process Description	Area of Concern
C-Port 2, LLC	4/16/24	C-Port 2, LLC (CP2) operates six slips and has two longer-term tenants (Shell Offshore, Incorporated and Halliburton) that it services. CP2 is associated with the Edison Chouest family of companies and is staffed by Cajun Ironworkers. CP2 loads and offloads vessels for tenants or for one-off clients at the slips. It also provides bulk raw material storage for water, methanol, and diesel. CP2 may offload waste from vessels at its slips, but the client at the slip will typically manage the wastes after offloading. CP2 accepts used oil and general trash from clients and other facilities and ships the wastes offsite. The site is registered as a Very Small Quantity Generator (VSQG) of hazardous waste due to activities such as painting. The facility has applied for a MARPOL COA.	Yes

SECTION II – OBSERVATIONS**Tenant:** C-Port 2, LLC**Section:** 2**Date:** 4/16/24, 1:35 P.M.**Contains AOC:** Yes**Contains CBI:** No**Lead Inspector:** Brook McKeown**Attendees:** Matt Labat (QHSE Manager), Craig Boudreaux (Site Manager)

Facility personnel provided the inspection team with a summary of operations at CP2. CP2 operates six slips at its port location and has two longer-term tenants (Shell Offshore, Inc and Halliburton) that it services on site (site map included as Appendix 2). CP2 loads and offloads vessels for tenants or for one-off clients at the slips and provides bulk raw material storage for water, methanol, and diesel. CP2 may offload waste from vessels at its slips, but the client at the slip will typically manage the wastes after offloading. CP2 accepts used oil and general trash from clients and other facilities, which it accumulates on site before shipping off. The site registered as a SQG of hazardous waste in February 2023 due to intermittent activities that generate hazardous waste, such as painting. During email follow-up, Mr. Labat stated that the facility would be moving back to VSQG status based on the amount of waste generated each month. The facility has applied for a MARPOL COA. In cases of spill response, CP2 will manage small spills on site and will contract out to a third-party in cases of large spills. In cases where a tenant or client has a spill, CP2 will work with them to clean it up or contract out the work. The most recent hazardous waste generated and sent off site by CP2 was 71 gallons of waste toluene sent off in March 2024.

After the opening meeting, the inspection team conducted a visual walkthrough of the facility and dock areas. At approximately 2:40 PM, the inspection team first observed Slip 5, which is currently not under a long-term lease. The inspection team observed a poly tote that was about 90 percent full and labeled with a DOT 1993 flammability placard. CP2 personnel stated that the tote contained diesel fuel from drip pans that will be managed as nonhazardous waste or may be reused. The inspection team also observed a 55-gallon drum used to accumulate used diesel filters and rags that is managed as nonhazardous waste. There was also a station for oil product dispensing in Slip 5. The inspection team observed catch buckets beneath the oil dispensing valves and what appeared to be staining on the ground around the oil dispensing station (see Appendix 1 – Photos 1 and 2). The ground did not appear to have an impermeable coating or other material to prevent releases to the environment, and the waste determination of the stained material was not known [**AOC #1:** *The stained materials from a prior spill at the oil dispensing station did not have a waste determination for whether they were hazardous or not. – 40 CFR 262.11*].

The inspection team then moved to observe the Waste Storage Area, where used oil is stored onsite. The inspection team observed the following.

- Three marine containers of used oil. The containers were labeled with tracking numbers for American Recovery (a used oil management company) and the words “used oil” (see Appendix 1 – Photo 3).
- An open-top drum basket with two 55-gallon plastic drums that were unlabeled besides American Recovery tracking numbers (see Appendix 1 – Photos 4 through 6). Mr. Boudreaux stated that the drums likely contained used oil. The drums contained liquids based on the weight when pushed [**AOC #2:** *Containers used to store used oil were not labeled with the words “used oil”. – 40 CFR 279.22(c)(1)*].
- Eight marine containers that were empty and may be scrap due to defects (see Appendix 1 – Photos

7 and 8).

- Oil dispensing stations that appeared to have oily water accumulated in the secondary containment (see Appendix 1 – Photos 9 and 10).
- Four non-empty drums with attached manifests identifying them as used oil received from Jackson Offshore to be sent to EIE Services LLC in Houma, LA with CP2 as a transfer site (see Appendix 1 – Photos 11 through 17). The manifest for the drums indicated that the used oil may have been on site for greater than 35 days since it was most recently dated in February 2024 [**AOC #3:** *Containers of used oil for transfer were stored on site for more than 35 days, which would make CP2 subject to regulation as a used oil processor and re-refiner. – 40 CFR 279.45(a)*].
- One drum without a label and showing signs of corrosion (see Appendix 1 – Photo 19). Inspector Wieber tapped the side of the drum and lifted one side to confirm that it was non-empty. The CP2 personnel stated that it is likely used oil. The inspection team also observed fifteen drums of used oil or used oil-related material with American Recovery tracking numbers and either no label, a blank label, or a label with illegible writing on it (examples shown in Appendix 1 – Photos 18, 20, and 21). Drums were confirmed to be non-empty by lifting one side. [**AOC #2:** *Containers used to store used oil were not labeled with the words “used oil”. – 40 CFR 279.22(c)(1)*]. The fifteen drums with American Recovery tracking numbers that were not properly or clearly labeled as used oil included the following tracking numbers: A70207, A70206, A70697, A70681, A70690, A71188, A73172, A73173, A70867, A70674, A70075, A70676, A70662, A70687, and A72287. An example of a drum with a completed and legible label is provided in Photo 22, Appendix 1.

An overview of the drums stored onsite is included in Photo 23, Appendix 1. The inspection team noted that there was no secondary containment for the used oil drums that had been received onsite from third parties for transfer [**AOC #4:** *Containers used to store used oil that had been received by CP2 for transfer were not equipped with secondary containment. – 40 CFR 279.45(d)*].

The inspection team then observed a roped-off area near Slip 9 with various containers and cargo. The area was used as product storage for sulfide scavenger and asphaltene inhibitor additives and contained a few other containers. The inspection team observed a 55-gallon drum of oily rags with an American Recovery tracking number, and two metal totes with DOT hazard labels (see Appendix 1 – Photos 24 and 25). The CP2 personnel stated that the metal totes contained residual sulfide scavenger and asphaltene inhibitor from pumping off the material, and that the material is under the custody of Shell. During email follow-up, Shell stated that CP2 had custody of the containers. It is not clear which entity is managing the material, and CP2 and Shell may be co-generators of the material at the location. The two metal totes and the drum of oily rags were not clearly labeled with their contents and should have a waste determination made if they are being managed as waste [**AOC #5:** *CP2 and/or Shell did not make a waste determination on the two metal totes of drilling additives and the 55-gallon drum of oily rags staged on site. – 40 CFR 262.11*].

The inspection team did not observe other areas of concern at the time of the inspection. A closing conference was conducted at approximately 4:15 PM with CP2 personnel. The AOCs were communicated during the closing and follow-up email from the inspection team the same day; however, further EPA review may change or add to the facility's potential AOCs. Following the inspection, the inspection team requested additional documentation as well as any responses to address the apparent AOCs identified. CP2 provided documentation and responses via email on 5/2/2024. CP2's email response can be found in Appendix 3. CP2 also provided an audit report containing corrective actions taken to address AOCs communicated during the inspection (included as Appendix 4). The inspection team noted the following

after reviewing the email response and attachments.

- Used oil containers with identification numbers A70690 and A70687 were listed on a manifest dated February 4, 2024 (Appendix 5), which means the used oil may have been on site for greater than 35 days at the time of the inspection [**AOC #3: Containers of used oil for transfer were stored on site for more than 35 days, which would make CP2 subject to regulation as a used oil processor and re-refiner. – 40 CFR 279.45(a)**]. Other nonhazardous waste manifests that CP2 provided for used oil containers stored on site were dated within 35 days prior to the date of the inspection.
- CP2 added a containment structure at the oil dispensing station in Slip 5 to prevent any spills of oil directly to the ground (photos provided in Appendix 4).
- CP2 is looking into moving their used oil storage to Slip 2 which is a covered area and setting up a containment berm as secondary containment for used oil on site. Appendix 4 includes a photo of several drums inside a containment berm in Slip 2.
- CP2 stated that additional training was conducted with facility personnel to address drum labeling and that a news bulletin was sent to facility personnel to inform them of the labeling requirements for used oil. Appendix 4 includes a photo from CP2 of drums that have been properly labeled on site as an example.
- CP2 made revisions to the site waste management plan and to the internal monthly walkthrough inspection checklist in order to prevent used oil containers from being onsite for greater than 35 days when being transferred. Revisions to the documents are shown in Appendix 4.

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: C-Port 2, LLC		
AOC #1 – The stained materials from a prior spill at the oil dispensing station did not have a waste determination for whether they were hazardous or not.	Citation: 40 CFR 262.11	Section: 2
AOC #2 – Containers used to store used oil were not labeled with the words “used oil”.	Citation: 40 CFR 279.22(c)(1)	Section: 2
AOC #3 – Containers of used oil for transfer were stored on site for more than 35 days, which would make CP2 subject to regulation as a used oil processor and re-refiner.	Citation: 40 CFR 279.45(a)	Section: 2
AOC #4 – Containers used to store used oil that had been received by CP2 for transfer were not equipped with secondary containment.	Citation: 40 CFR 279.45(d)	Section: 2
AOC #5 – CP2 and/or Shell did not make a waste determination on the two metal totes of drilling	Citation: 40 CFR 262.11	Section: 2

additives and the 55-gallon drum of oily rags staged on site.		
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SECTION V – FOLLOW UP

Documents or files provided by the facility were transmitted via email and included responses to AOCs and provision of documents requested.

Communication Log

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

1. 4/30/2024 email – Matt Labat provided an internal corrective action audit report.
2. 5/2/2024 email – Matt Labat provided requested documentation as attachments, and written responses to areas of concern and follow-up questions from EPA.

SECTION VI – LIST OF APPENDICES

Appendix 1. Photograph Log

Appendix 2. CP2 Site Layout

Appendix 3. CP2 Email Response on 05/02/2024

Appendix 4. Corrective Action Audit Report and Response

Appendix 5. Used Oil Manifest

APPENDIX 1.
PHOTOGRAPH LOG



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Photograph Log

Photo No. 1

Location: C-Port 2, LLC		
City: Golden Meadow	County/Parish: Lafourche	State: Louisiana



Photo File Name: DSCN0984

Date of Photo: 04/16/2024

Time of Photo: 14:54 hrs.

Photographer: George Wieber

Description: View of oil product drums at a dispensing station in Slip 5. The inspection team observed staining on the ground that appeared to be from the oil dispensing.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Photograph Log

Photo No. 2

Location: C-Port 2, LLC		
City: Golden Meadow	County/Parish: Lafourche	State: Louisiana



Photo File Name: DSCN0985

Date of Photo: 04/16/2024

Time of Photo: 14:54 hrs.

Photographer: George Wieber

Description: View of oil product drums at a dispensing station in Slip 5.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Photograph Log

Photo No. 3

Location: C-Port 2, LLC		
City: Golden Meadow	County/Parish: Lafourche	State: Louisiana



Photo File Name: DSCN0986

Date of Photo: 04/16/2024

Time of Photo: 15:18 hrs.

Photographer: George Wieber

Description: View of three marine containers used to accumulate used oil at CP2.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 4

Location: C-Port 2, LLC		
City: Golden Meadow	County/Parish: Lafourche	State: Louisiana



Photo File Name: DSCN0987

Date of Photo: 04/16/2024

Time of Photo: 15:20 hrs.

Photographer: George Wieber

Description: View of an open-top drum basket with two 55-gallon drums. The drums likely contained used oil based on discussion with facility representatives, but the drums were not labeled "used oil".



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 5

Location: C-Port 2, LLC		
City: Golden Meadow	County/Parish: Lafourche	State: Louisiana



Photo File Name: DSCN0988

Date of Photo: 04/16/2024

Time of Photo: 15:21hrs.

Photographer: George Wieber

Description: View of an open-top drum basket with two 55-gallon drums.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 6

Location: C-Port 2, LLC		
City: Golden Meadow	County/Parish: Lafourche	State: Louisiana



Photo File Name: DSCN0989

Date of Photo: 04/16/2024

Time of Photo: 15:21 hrs.

Photographer: George Wieber

Description: View of an open-top drum basket with two 55-gallon drums. The drums likely contained used oil based on discussion with facility representatives, but the drums were not labeled "used oil" (same drums shown in Photo No. 4).



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 7

Location: C-Port 2, LLC		
City: Golden Meadow	County/Parish: Lafourche	State: Louisiana



Photo File Name: DSCN0990

Date of Photo: 04/16/2024

Time of Photo: 15:30 hrs.

Photographer: George Wieber

Description: View of empty marine containers stored on site and managed as scrap due to defects.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 8

Location: C-Port 2, LLC		
City: Golden Meadow	County/Parish: Lafourche	State: Louisiana



Photo File Name: DSCN0991

Date of Photo: 04/16/2024

Time of Photo: 15:31 hrs.

Photographer: George Wieber

Description: View of empty marine containers stored on site and managed as scrap due to defects.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 9

Location: C-Port 2, LLC		
City: Golden Meadow	County/Parish: Lafourche	State: Louisiana



Photo File Name: DSCN0992

Date of Photo: 04/16/2024

Time of Photo: 15:32 hrs.

Photographer: George Wieber

Description: View of an oil dispensing station secondary containment that had oily water residuals present at the time of the inspection.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 10

Location: C-Port 2, LLC

City: Golden Meadow

County/Parish: Lafourche

State: Louisiana



Photo File Name: DSCN0993

Date of Photo: 04/16/2024

Time of Photo: 15:33 hrs.

Photographer: George Wieber

Description: View of an oil dispensing station on site.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 11

Location: C-Port 2, LLC

City: Golden Meadow

County/Parish: Lafourche

State: Louisiana

Photo File Name: DSCN0994

Date of Photo: 04/16/2024

Time of Photo: 15:41 hrs.

Photographer: George Wieber

Description: View of a manifest taped to the side of a used oil drum received from Jackson Offshore and staged in the Waste Storage Area at CP2. The date on the manifest was greater than 35 days prior to the inspection date.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 12

Location: C-Port 2, LLC		
City: Golden Meadow	County/Parish: Lafourche	State: Louisiana

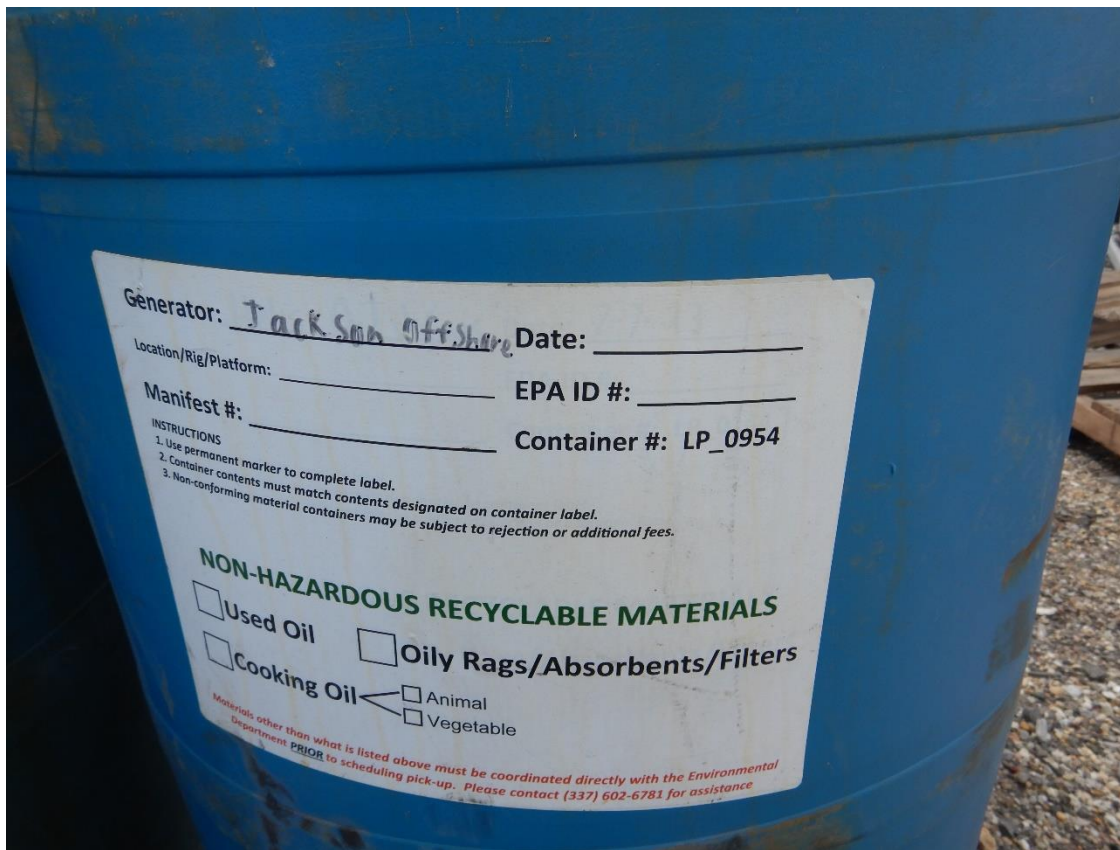


Photo File Name: DSCN0995

Date of Photo: 04/16/2024

Time of Photo: 15:41 hrs.

Photographer: George Wieber

Description: View of a label on a 55-gallon drum in the Waste Storage Area, with the drum identifying Jackson Offshore as the generator.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 13

Location: C-Port 2, LLC		
City: Golden Meadow	County/Parish: Lafourche	State: Louisiana



Photo File Name: DSCN0996

Date of Photo: 04/16/2024

Time of Photo: 15:42 hrs.

Photographer: George Wieber

Description: View of used oil drums staged in the Waste Storage Area at CP2. Several of the containers shown in the image were received from Jackson Offshore.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 14

Location: C-Port 2, LLC		
City: Golden Meadow	County/Parish: Lafourche	State: Louisiana



Photo File Name: DSCN0997

Date of Photo: 04/16/2024

Time of Photo: 15:42 hrs.

Photographer: George Wieber

Description: View of a 55-gallon drum in the Waste Storage Area, with the drum label identifying Jackson Offshore as the generator.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 15

Location: C-Port 2, LLC		
City: Golden Meadow	County/Parish: Lafourche	State: Louisiana

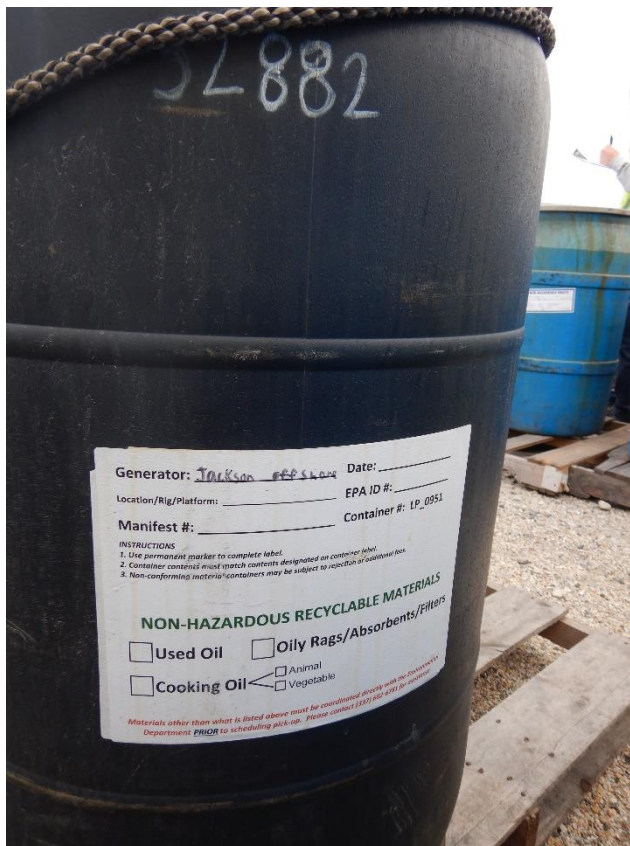


Photo File Name: DSCN0998

Date of Photo: 04/16/2024

Time of Photo: 15:43 hrs.

Photographer: George Wieber

Description: View of a 55-gallon drum in the Waste Storage Area, with the drum label identifying Jackson Offshore as the generator.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 16

Location: C-Port 2, LLC		
City: Golden Meadow	County/Parish: Lafourche	State: Louisiana



Photo File Name: DSCN0999

Date of Photo: 04/16/2024

Time of Photo: 15:43 hrs.

Photographer: George Wieber

Description: View of a 55-gallon drum in the Waste Storage Area, with the drum label identifying Jackson Offshore as the generator.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 17

Location: C-Port 2, LLC		
City: Golden Meadow	County/Parish: Lafourche	State: Louisiana



Photo File Name: DSCN1000

Date of Photo: 04/16/2024

Time of Photo: 15:44 hrs.

Photographer: George Wieber

Description: View of a 55-gallon drum in the Waste Storage Area, with the drum label identifying Jackson Offshore as the generator.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 18

Location: C-Port 2, LLC		
City: Golden Meadow	County/Parish: Lafourche	State: Louisiana



Photo File Name: DSCN1001

Date of Photo: 04/16/2024

Time of Photo: 15:46 hrs.

Photographer: George Wieber

Description: View of a 55-gallon drum of used oil or used oil-related material that had a blank label and was staged in the Waste Storage Area.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 19

Location: C-Port 2, LLC		
City: Golden Meadow	County/Parish: Lafourche	State: Louisiana



Photo File Name: DSCN1002

Date of Photo: 04/16/2024

Time of Photo: 15:48 hrs.

Photographer: George Wieber

Description: View of a 55-gallon drum of used oil or used oil-related material that showed signs of corrosion and had no label.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 20

Location: C-Port 2, LLC		
City: Golden Meadow	County/Parish: Lafourche	State: Louisiana



Photo File Name: DSCN1003

Date of Photo: 04/16/2024

Time of Photo: 15:53 hrs.

Photographer: George Wieber

Description: View of a 55-gallon drum of used oil or used oil-related material that had no label besides the American Recovery tracking number.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 21

Location: C-Port 2, LLC		
City: Golden Meadow	County/Parish: Lafourche	State: Louisiana



Photo File Name: DSCN1004

Date of Photo: 04/16/2024

Time of Photo: 15:54 hrs.

Photographer: George Wieber

Description: View of 55-gallon drums of used oil or used oil-related material that had no labels identifying their contents.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 22

Location: C-Port 2, LLC		
City: Golden Meadow	County/Parish: Lafourche	State: Louisiana



Photo File Name: DSCN1005

Date of Photo: 04/16/2024

Time of Photo: 15:54 hrs.

Photographer: George Wieber

Description: View of a 55-gallon drum in the Waste Storage Area containing used oil-related materials. The drum had a completed label.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 23

Location: C-Port 2, LLC		
City: Golden Meadow	County/Parish: Lafourche	State: Louisiana



Photo File Name: DSCN1006

Date of Photo: 04/16/2024

Time of Photo: 16:00 hrs.

Photographer: George Wieber

Description: Overview of the drum staging area for used oil in the Waste Storage Area.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 24

Location: C-Port 2, LLC		
City: Golden Meadow	County/Parish: Lafourche	State: Louisiana



Photo File Name: DSCN1007

Date of Photo: 04/16/2024

Time of Photo: 16:07 hrs.

Photographer: George Wieber

Description: View of metal totes containing residual sulfide scavenger and asphaltene inhibitor from pumping off the material and staged in a tenant-owned area. The totes were only labeled with a DOT hazard sticker at the time of the inspection.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 25

Location: C-Port 2, LLC		
City: Golden Meadow	County/Parish: Lafourche	State: Louisiana



Photo File Name: DSCN1008

Date of Photo: 04/16/2024

Time of Photo: 16:12 hrs.

Photographer: George Wieber

Description: View of a 55-gallon drum staged in a tenant-owned area. Facility personnel stated that the drum contained used oil rags.

APPENDIX 2.
CP2 SITE LAYOUT

APPENDIX 3. CP2 EMAIL RESPONSE ON 05/02/2024

APPENDIX 4. CORRECTIVE ACTION AUDIT REPORT AND RESPONSE

APPENDIX 5. USED OIL MANIFEST