

INSPECTION REPORT

Inspection Entry Date/Time	11/6/2024 15:40 (CT)	Announced: No (tenants and related facilities)		
Inspection Exit Date/Time	11/6/2024 16:30 (CT)	Access: Granted		
Regulatory Program	RCRA			
Type of Inspection	Focused Compliance Inspection (FCI)			
Facility or Site Name	National Tank Services			
Facility/Site Identifier	TXD051877348			
Facility/Site Physical Address	5055 Washington Blvd.			
City, State, Zip Code	Beaumont, TX 77707			
County/Borough	Jefferson County			
Generator Status	Small Quantity Generator (SQG)			
NAICS	484121			
Type of Operation	National Tank Services cleans trailers and vacuum trucks used to transport chemical products.			
Geographic Coordinates	30.0556, -94.1489			
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, 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
National Tank Services	Andrew Ferrill	(402) 293-2772	AFerrill@NationalTankServices.com	Yes	Yes
National Tank Services	Reginald Keller	(409) 203-8501	ReKeller@trimac.com	Yes	Yes

Facility General Description

Tenant/Area	Inspection Date	Process Description	Area of Concern
National Tank Services	11/06/24	National Tank Services (NTS) cleans trailers and vacuum trucks that are used to transport chemical products. Most vehicles it services are a part of its sister company Trimac Transportation. It is a purely land-based facility and does not operate under a MARPOL COA.	No

SECTION II – OBSERVATIONS

Tenant: National Tank Services			
Section: 2.1	Date: 11/06/24, 02:45 PM	Contains AOC: No	Contains CBI: No
Lead Inspector: Vince Damiano	Attendees: Andrew Ferrill (Service Manager), Reginald Keller (Supervisor)		
NTS is located in Beaumont and primarily cleans tanker trucks and trailers used to transport chemicals and other products such as oil. NTS removes any tank bottoms or heels from tanker trucks or trailers to ensure no cross-contamination for future transportation. NTS mainly services Trimac Transportation’s fleet of tanker trucks. Trimac Transportation and NTS share the same owner. NTS uses a detergent or caustic wash to clean out a non-hazardous tank and a combination of both or small amounts of specialty cleaning chemicals when washing a tank that was previously transporting hazardous materials. NTS will sometimes flare the inside of a tank if required. This depends on the material that was previously transported in the tank. NTS periodically generates hazardous waste from excess products left in tanks. NTS uses the waste profile for the material of concern and consult with the company's environmental team to properly dispose of the waste. NTS is registered as a SQG of hazardous waste with the EPA (TXD051877348). Following the opening conference, the inspection team began a visual inspection at 4:10 PM. The inspection team first observed the two wash bays where tank cleaning is conducted by NTS. The inspection team then observed NTS’s water treatment process where wash water from the wash bays is collected in a sump and then sent through a series of oil water separators, equalizer tanks, clarifier tanks, and biological bug tanks. The inspection team observed the waste storage area located outside of the wash bays. The waste storage area was currently storing three 55-gallon drums of non-hazardous oil-contaminated absorbents and one 55-gallon drum of used oil that was properly labeled “Used Oil” and was in good condition and closed. The inspection team did not observe any apparent areas of concern (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 4:30 PM with NTS personnel.			

SECTION III – RECORDS REVIEW

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

SECTION IV – AREAS OF CONCERN

Not Applicable

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.