

INSPECTION REPORT

Inspection Entry Date/Time	04/19/2024 9:30 (CT)			Announced: No
Inspection Exit Date/Time	04/19/2024 10:09 (CT)			Access: Granted
Regulatory Program	RCRA			
Type of Inspection	Focused Compliance Inspection (FCI)			
Facility or Site Name	Martin Energy Services			
Facility/Site Identifier	LAR000067165			
Facility/Site Physical Address	821 Henry Pugh Blvd			
City, State, Zip Code	Lake Charles, LA 70605			
County/Borough	Calcasieu Parish			
Generator Status	Very Small Quantity Generator (VSQG)			
NAICS	42471			
Type of Operation	Martin Energy Services provides oil fueling and used oil reception services for barges and tugs on their docks.			
Geographic Coordinates	30.10554, -93.304878			
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				07/24/2024
	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
Martin Energy Services	04/19/24	Martin Energy Services (Martin) provides oil fueling and used oil reception for barges and tugs on their docks. They operate storage tanks that either pump lube oil and diesel fuel to these vessels or receive used oil from the barges. They do not take any other materials/waste off boats besides general trash. They generate used oil, used oil filters, and oily rags. They do not have a MARPOL certificate.	No

SECTION II – OBSERVATIONS

Tenant: Martin Energy Services			
Section: 2.1	Date: 04/19/24, 9:30 AM	Contains AOC: No	Contains CBI: No
Lead Inspector: Cameron Tanaka	Attendees: Charles Benoit (PIC)		
Martin Energy Services (Martin) pumps lube oil and diesel fuel to barges, tugboats, and other vessels from their storage tanks through pipes and hoses. They also take used oil, oily debris, and general household trash off these vessels. Used oil from vessels is held in a used oil tank in the same area as their fuel storage tanks. They do not store used oil in drums. Used oil is transported off site by Holcomb Environmental Oil Services, LLC in Houston, TX or another third-party transporter using vacuum trucks approximately once a week. Martin also hires third-party mechanics to perform oil changes. These mechanics put the used oil in the same used oil storage tank. Martin stores oily debris and product material in drums. General household trash is disposed of in municipal dumpsters. Used batteries are returned to the supplier for their cores. Martin is classified as a used oil transfer, transporter, and a VSQG with EPA ID LAR000067165. They do not have a MARPOL COA. Oil and Used Oil Storage Area The inspection team then performed a walk-through of Martin's oil and used oil storage area. The team observed the facility's two used oil tanks which contained 4,789 and 1,953 gallons of used oil (see Appendix 1 – Photos 1 and 2). Each tank has a maximum capacity of 8,000 gallons. The team also observed the facility's 13 used oil filter drums (see Appendix 1 – Photos 3 and 4). No apparent AOCs were observed by the inspection team during the time of the inspection. A closing conference was conducted at approximately 10:00 AM with Mr. Benoit. The inspection team requested the facility's EPA ID and confirmation that they do not have a MARPOL COA. In their follow-up email (see Appendix 2), Mr. Benoit provided the facility's EPA ID and confirmed that they do not have a MARPOL COA.			

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. Martin did not have any Areas of Concern.

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. 05/01/24 Martin email – Charles Benoit sent an email containing confirmation that Martin does not have a MARPOL COA and their EPA ID.

SECTION VI – LIST OF APPENDICES

Appendix 1. Photograph Log

Appendix 2. Follow-Up Email from Martin Energy Services

APPENDIX 1.
PHOTOGRAPH LOG



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 1

Location: Martin Energy Services		
City: Lake Charles	County/Parish: Calcasieu	State: Louisiana



Photo File Name: DSCN7203

Date of Photo: 04/19/2024

Time of Photo: 09:01 hrs.

Photographer: Anshul Paripati

Description: Overview of two used oil tanks in Martin's oil and used oil storage area.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 2

Location: Martin Energy Services		
City: Lake Charles	County/Parish: Calcasieu	State: Louisiana



Photo File Name: DSCN7204

Date of Photo: 04/19/2024

Time of Photo: 09:01 hrs.

Photographer: Anshul Paripati

Description: Closeup view of a label on one of the two used oil tanks in Martin's oil and used oil storage area.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 3

Location: Martin Energy Services		
City: Lake Charles	County/Parish: Calcasieu	State: Louisiana



Photo File Name: DSCN7205

Date of Photo: 04/19/2024

Time of Photo: 09:03 hrs.

Photographer: Anshul Paripati

Description: Overview of used oil filter drums in Martin's oil and used oil storage area.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 4

Location: Martin Energy Services		
City: Lake Charles	County/Parish: Calcasieu	State: Louisiana



Photo File Name: DSCN7206

Date of Photo: 04/19/2024

Time of Photo: 09:03 hrs.

Photographer: Anshul Paripati

Description: Closeup view of one of the used oil filter drums in Martin's oil and used oil storage area.

APPENDIX 2.
FOLLOW-UP EMAIL FROM MARTIN ENERGY SERVICES

RE: Follow-Up from EPA Inspection (Martin Energy Services)

Charles Benoit <Charles.Benoit@martinmlp.com>

Wed 2024-05-01 4:20 PM

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

Cc: Robert Cast <Robert.Cast@martinmlp.com>; Jared Manuel <Jared.Manuel@martinmlp.com>

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

Our EPA ID# LAR000067165 and we do not have a MARPOL COA number.

Chuck Benoit

Martin Energy Services Dock 19

Lake Charles La

Ph# 337-474-5284

Dock Cell#337-605-0114

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

Sent: Monday, April 22, 2024 2:22 PM

To: Charles Benoit <Charles.Benoit@martinmlp.com>

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

Subject: Follow-Up from EPA Inspection (Martin Energy Services)

CAUTION: This email originated from outside the Martin organization. Do not click links or open attachments unless you recognize the sender and know the content is safe. If you suspect this email is a Phish attempt, please click the "Phish Alert" button.

Hi Chuck,

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

- Your EPA ID if you find you have one
- Your MARPOL COA if you find you have one

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. 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