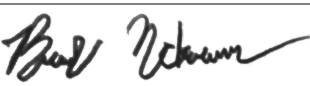


INSPECTION REPORT

Inspection Entry Date/Time	4/16/2024 09:00 AM (CT)	Announced: No		
Inspection Exit Date/Time	4/16/2024 12:25 PM (CT) Closing Conference	Access: Granted		
Regulatory Program	RCRA			
Type of Inspection	Focused Compliance Inspection (FCI)			
Facility or Site Name	Shell Offshore, Inc			
Facility/Site Identifier	LAR000054197			
Facility/Site Physical Address	180 1 st Street			
City, State, Zip Code	Golden Meadow, LA 70357			
County/Borough	Lafourche Parish			
Generator Status	Large Quantity Generator (LQG), Transporter			
NAICS	<u>211120</u>			
Type of Operation	Crude Petroleum Extraction			
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
Shell Offshore, Inc	4/16/24	Shell Offshore Inc (Shell) operates as a logistics hub for transferring wastes, raw materials, products, and equipment to and from offshore assets. Wastes received from offshore assets includes nonhazardous waste, universal waste, used oil, Exploration and Production (E&P) wastes, general/domestic trash, and hazardous wastes. Wastes received from offshore are staged onsite temporarily before being transported offsite. Shell also operates as a LQG of hazardous waste due to cleanup waste from spills of material onsite. Shell is a tenant of C-Port 2 LLC (CP2), which has applied for a MARPOL COA for the site.	Yes

SECTION II – OBSERVATIONS**Tenant:** Shell Offshore, Inc**Section:** 2**Date:** 4/16/24, 9:00 A.M.**Contains AOC:** Yes**Contains CBI:** No**Lead Inspector:** Brook McKeown**Attendees:** Toby LeMaire (Waste Management Rep.), James Autin (Environmental Logistics), Payton Rogers (Tank Cleaning Lead), Al Archer (Waste Coordinator)

Facility personnel provided the inspection team with an overview of operations at Shell. Shell operates as a logistics hub for offshore assets by serving as a shipping and receiving point for equipment, waste, products, and supplies going to and from offshore assets (i.e., drilling platforms) via ship. Shell leases three slips (Stations 8, 9, and 12) and an operating area from CP2 for their operations. Wastes received from offshore assets via ship are unloaded in containers at the Shell slips and staged onsite before transportation offsite by third parties. Shell receives various waste streams from its affiliated offshore assets including general/domestic trash, hazardous waste, nonhazardous industrial waste, recyclable materials (e.g., scrap metal, plastic), universal wastes, used oil, and E&P waste. Waste determinations are completed by the offshore assets that generate the wastes, and Shell only serves as a transporter and transfer facility. Ships that pick up the waste from offshore assets are contracted out, and any hazardous waste picked up from the offshore assets lists the contracted ship as the first transporter on a hazardous waste manifest. Shell is then listed as the second transporter on any hazardous waste manifests generated by offshore assets. Shell does not receive wastes generated by the contracted ships, only the wastes generated by offshore assets.

Shell manages wastes received onsite in the Hazardous Waste Staging Area. General/domestic trash may also be disposed in plant trash dumpsters. Used oil typically gets picked up by Aaron Oil or Omega Waste Management for recycling, PSC picks up and manages universal wastes (including lightbulbs and batteries) and e-waste, Chemical Waste Management Inc picks up hazardous waste and sometimes nonhazardous wastes, and Omega Waste Management typically picks up nonhazardous wastes for transport to the Woodside RDF Landfill. PSC accepts containers at their location in Port Fourchon from Shell, which are initially received at Shell's CP2 location, that are awaiting a determination as to whether they are usable product or waste. Hazardous waste pickups occur every Wednesday, used oil and nonhazardous wastes are picked up approximately every day, and universal waste pickups occur roughly once per week or more frequently depending on the volume of waste. E&P waste is mostly offloaded at other facilities such as EcoServ for cleaning out the vessel, though Shell may receive the E&P waste in containers onsite and ship it off for cleaning and disposal. All waste streams sent offsite are sent in containers via truck.

Shell also operates as a LQG for hazardous waste (EPA ID LAR000054197) due to wastes primarily generated during spill cleanup operations. Facility personnel stated that spills occur approximately two or three times each month during material handling operations. Spill cleanup is contracted out to Clean Tank or PMI. Any spill cleanup materials generated are tested by Shell's contractor Waste Management, and a waste determination is made based on the analytical. Shell also generates hazardous waste aerosol cans from onsite operations.

After the opening meeting, the inspection team conducted a visual walkthrough of the facility and dock area.

Hazardous Waste Staging Area

The inspection team first observed the Hazardous Waste Staging Area starting at approximately 10:15 AM (see Appendix 1 – Photos 6 and 7). The Hazardous Waste Staging Area has a small shed used for managing hazardous wastes (see Appendix 1 – Photo 1), including 10-day transfer containers and containers of hazardous waste generated onsite. Inside the shed, the inspection team observed three 55-gallon drums of hazardous waste paint for 10-day transfer, a 55-gallon drum of hazardous waste generated onsite from a spill, a 55-gallon drum of hazardous waste aerosol cans that served as a satellite accumulation area (SAA) container, and a 5-gallon bucket of nonhazardous waste soda ash.

Non-hazardous and Other Waste Staging Area

Outside of the shed in the Hazardous Waste Staging Area, the inspection team also observed nonhazardous wastes, used oil, and waste containers that had been received onsite that same morning and were still undergoing processing. The inspection team observed the following.

- Five 55-gallon drums of nonhazardous wastes going to Chemical Waste Management Inc.
- A 55-gallon drum of used antifreeze/coolant and a 55-gallon drum of crude oil rags going to Aaron Oil (see Appendix 1 – Photos 2 and 3).
- A cubic yard metal box managed as nonhazardous waste containing items such as oily rags (see Appendix 1 – Photos 4 and 5) and seven supersacks of nonhazardous used filters going to Omega Waste Management. The inspection team noted that the cubic yard metal box was not identified as used oil, and asked Shell personnel to confirm that no free-flowing liquid is present in the container.
- A roll-off container and two steel crates of supersacks of nonhazardous waste to be sent to the Woodside RDF landfill.
- Eleven 55-gallon drums of incoming waste containers received onsite the same day that were awaiting sorting into their proper staging area. The drums included used oil, jet fuel, spent diesel, a RCRA empty container, hazardous waste sump sludge, and grease trap cleanout wastes. The containers had not yet been moved to the appropriate staging area, and were still located within marine pallets used to transfer containers off of vessels.

The inspection team noted during the walkthrough that the staging areas for wastes going to Aaron Oil and Omega Waste Management did not have secondary containment. **[AOC #1: The storage area for used oil at the transfer facility does not have secondary containment. – 40 CFR 279.45(d)].**

Slips

The inspection team then visually observed the three slips leased by Shell, and no areas of concern were noted at the time of the inspection. The inspection team did not observe other areas of concern at the time of the inspection. A closing conference was conducted at approximately 12:00 PM with Shell 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.

During an inspection at CP2, which leases to Shell and is co-located, CP2 personnel identified several containers nearby Slip 9 as property of Shell. There were two metal totes containing residuals from pumping off sulfide scavenger and asphaltene inhibitor additives as well as a 55-gallon drum of used oil rags (see Appendix 1 – Photos 8 and 9). The inspection team did not identify the quantity of material in

each of the metal containers. The 55-gallon drum was observed to contain used oil rags, but the inspection team could not determine if free liquid was present.

Following the inspection, the inspection team requested additional documentation as well as any responses to address the apparent AOCs identified. Shell provided the requested documentation and responses via email on 4/26/2024. Shell's email response can be found in Appendix 2. The email response and attachments addressed the following.

- Shell stated that the containers observed during the inspection of the CP2 facility are under the custody of CP2, not Shell. The inspection team did not receive a consensus directly from both parties. 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 #2**: *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*].
- Shell deployed a containment berm around the area where used oil containers are staged for transfer (photo included as Appendix 3).
- Shell stated that the 55-gallon drum of crude oil rags and the metal tote of used oil-related materials are not considered "used oil". The response stated that containers of used oil-related materials (such as rags or debris) do not contain visible signs of free-flowing liquids. Shell also stated that crude oil rags contain unrefined crude oil and not "used oil", which they interpret as used refined or synthetic oil.
- Other documentation included in the email response did not result in apparent areas of concern.

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: Shell Offshore, Inc		
AOC #1 – The storage area for used oil at the transfer facility does not have secondary containment.	Citation: 40 CFR 279.45(d)	Section: 2
AOC #2 – 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.	Citation: 40 CFR 262.11	Section: 2

SECTION V – FOLLOW UP

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

Communication Log

After the inspection, additional information was emailed to EPA on 4/26/2024. In the email correspondence, Warren Moity provided requested documentation as attachments, a photograph showing a containment berm for used oil (Appendix 3), and written responses to areas of concern.

SECTION VI – LIST OF APPENDICES

Appendix 1. Photograph Log

Appendix 2. Shell Offshore Response on 04/26/24

Appendix 3. Corrective Action Photograph

APPENDIX 1.
PHOTOGRAPH LOG



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Photograph Log

Photo No. 1

Location: Shell Offshore Inc		
City: Golden Meadow	County/Parish: Lafourche	State: Louisiana



Photo File Name: DSCN0974

Date of Photo: 04/16/2024

Time of Photo: 10:25 hrs.

Photographer: George Wieber

Description: View of the hazardous waste shed that contained the central accumulation area (CAA) and a satellite accumulation area (SAA) for the site. There were four hazardous waste drums in the CAA and one hazardous waste drum used as a SAA for aerosol cans. The 5-gallon bucket shown in the image is nonhazardous waste.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 2

Location: Shell Offshore Inc

City: Golden Meadow

County/Parish: Lafourche

State: Louisiana



Photo File Name: DSCN0975

Date of Photo: 04/16/2024

Time of Photo: 10:32 hrs.

Photographer: George Wieber

Description: View a label on a 55-gallon drum of crude oil rags staged in the Waste Area.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 3

Location: Shell Offshore Inc		
City: Golden Meadow	County/Parish: Lafourche	State: Louisiana



Photo File Name: DSCN0976

Date of Photo: 04/16/2024

Time of Photo: 10:32 hrs.

Photographer: George Wieber

Description: View of two 55-gallon drums staged in the Waste Area to be sent to Aaron Oil. One drum was labeled as "crude oil rags" and the other was labeled as "used antifreeze/coolant".



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 4

Location: Shell Offshore Inc		
City: Golden Meadow	County/Parish: Lafourche	State: Louisiana



Photo File Name: DSCN0977

Date of Photo: 04/16/2024

Time of Photo: 10:33 hrs.

Photographer: George Wieber

Description: View of the label on a metal cubic yard box identifying the contents as oil-related materials. The container was labeled as "industrial non-hazardous waste".



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 5

Location: Shell Offshore Inc		
City: Golden Meadow	County/Parish: Lafourche	State: Louisiana



Photo File Name: DSCN0978

Date of Photo: 04/16/2024

Time of Photo: 10:34 hrs.

Photographer: George Wieber

Description: View of a metal cubic yard box staged in the Waste Area (label shown in Photo No. 4).



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Photograph Log

Photo No. 6

Location: Shell Offshore Inc		
City: Golden Meadow	County/Parish: Lafourche	State: Louisiana



Photo File Name: DSCN0979

Date of Photo: 04/16/2024

Time of Photo: 10:50 hrs.

Photographer: George Wieber

Description: View of the Waste Area with containers staged on site.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Photograph Log

Photo No. 7

Location: Shell Offshore Inc		
City: Golden Meadow	County/Parish: Lafourche	State: Louisiana



Photo File Name: DSCN0980

Date of Photo: 04/16/2024

Time of Photo: 10:51 hrs.

Photographer: George Wieber

Description: View of the Waste Area with containers staged on site.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 8

Location: Shell Offshore Inc		
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 cubic yard boxes containing residuals of sulfide scavenger and asphaltene inhibitor additives observed during an inspection of CP2. Shell stated these containers were under custody of CP2.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 9

Location: Shell Offshore Inc		
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 containing used oil rags observed during an inspection of CP2. Shell stated these containers were under custody of CP2.

APPENDIX 2.
SHELL OFFSHORE RESPONSE ON 04/26/24

APPENDIX 3. CORRECTIVE ACTION PHOTOGRAPH