

INSPECTION REPORT

Inspection Entry Date/Time	03/13/2024 11:10 (CT)			Announced: No
Inspection Exit Date/Time	03/13/2024 16:10 (CT)			Access: Granted
Regulatory Program	RCRA			
Type of Inspection	Focused Compliance Inspection (FCI)			
Facility or Site Name	Enbridge Ingleside Oil Terminal			
Facility/Site Identifier	TX0170099915			
Facility/Site Physical Address	1450 Lexington Blvd. Building 300			
City, State, Zip Code	Ingleside, TX 78362			
County/Borough	San Patricio County			
Generator Status	Very Small Quantity Generator (VSQG)			
NAICS	493190			
Type of Operation	Enbridge Ingleside Oil Terminal operates as a terminal and storage facility for crude oil and crude oil condensate.			
Geographic Coordinates	27.8252, -97.2055			
Additional Persons Participating in Inspection:				
Name	Title	Organization	Email	Phone
Joyce Johnson	Inspector	EPA REGION 6	Johnson.Joyce@epa.gov	(214) 665-8548
Erin Young-Dahl	Inspector	EPA REGION 6	YoungDahl.Erin@epa.gov	(214) 665-3166
Andrew Gates	Contractor	Eastern Research Group (ERG)	Andrew.Gates@erg.com	(657) 206-7829
Lead Inspector:				
Vince Damiano				07/11/2024
	ERG	Vince.Damiano@erg.com	(703) 633-1732	

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

The Port of Corpus Christi 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	Vince Damiano	(703) 633-1732	Vince.Damiano@erg.com	Yes	Yes
RCRA Inspector/ Contractor/ERG	Andrew Gates	(657) 206-7829	Andrew.Gates@erg.com	Yes	Yes
Inspector/Enforcement Officer/EPA Region 6	Joyce Johnson	(214) 665-8548	Johnson.Joyce@epa.gov	Yes	Yes
Inspector/Enforcement Officer/EPA Region 6	Erin Young-Dahl	(214) 665-3166	YoungDahl.Erin@epa.gov	Yes	Yes

Facility General Description

Tenant/Area	Inspection Date	Process Description	Area of Concern
Enbridge Ingleside Oil Terminal	03/13/24	Enbridge Ingleside Oil Terminal (Enbridge) operates as a terminal and storage facility for crude oil and crude oil condensate. Enbridge receives material via pipeline and stores it onsite before loading it on to ships. Bunker fuel also arrives by barge and can be either loaded directly onto ships or stored on site before loading. No truck rack, outgoing pipeline, or rail loading operations take place at this facility. The facility maintains a MARPOL COA for Annex V but does not receive waste from vessels.	Yes

SECTION II – OBSERVATIONS

Tenant: Enbridge Ingleside Oil Terminal			
Section: 2.1	Date: 03/13/24, 11:10 AM	Contains AOC: Yes	Contains CBI: No
Lead Inspector: Vince Damiano	Attendees: Preston Bailey (Facility Manager), Austin Taylor (Environmental), Maegan Saverline (Environmental), Robert Thurman (Shift Lead)		
Enbridge is located on Corpus Christi Bay and operates as a crude oil terminal. Enbridge receives crude oil and crude oil condensate by pipeline, stores it in tanks, and loads it onto vessels for transportation. Enbridge is not affiliated with the Port of Corpus Christi and operates on its four dock spaces: Berth 2, Berth 4, Berth 5, and Berth 7. Enbridge does maintain a MARPOL COA for Annex V and is registered with EPA as a VSQG of hazardous waste (EPA ID TX0170099915). Enbridge personnel stated they do not allow the transfer of waste across their dock space and are not familiar with any third-party transporting waste off of ships at their facility. Ms. Saverline and Mr. Taylor summarized the waste streams generated at the facility as oily pads, used oil, paint related waste, universal waste bulbs, universal waste batteries, and other various non-hazardous waste streams. During the inspection, the inspection team observed the storage area for the lab (Appendix 1 – Photo 1), the waste building (Appendix 1 – Photos 2 to 14), the paint waste area (Appendix 1 – Photos 15 to 21) and the dock storage area (Appendix 1 – Photo 22). Observations and AOCs are organized by section below along with facility responses where relevant. Storage Area Outside of lab: During the inspection, the inspection team observed three mostly-full 55-gallon drums of used oil that were not labeled as ‘Used Oil’ (see Appendix 1 – Photo 1). [AOC #1– <i>Enbridge did not clearly label containers used to store used oil with the words “Used Oil” - 40 CFR 279.22(c)(1)</i>] Waste Building: In the waste building, the inspection team first observed five boxes and nine individual universal waste lamps that were being stored outside of a container sitting on top of boxes on a shelf (see Appendix 1 – Photo 2). [AOC #2– <i>Enbridge did not store universal waste lamps in a container or package that is structurally sound and able to prevent breakage – 40 CFR 273.13 (d)(1)</i>] Also, the universal waste lamps were not properly labeled (see Appendix 1 – Photo 3). [AOC #3– <i>Enbridge did not store universal waste lamps with a label containing one of the following phrases: “Universal Waste—Lamp(s),” or “Waste Lamp(s),” or “Used Lamp(s)” – 40 CFR 273.14 (e)</i>]; and see AOC #4 listed below). The inspection team also observed full two boxes containing universal waste lamps that did not contain any label or indication of how long they have been stored inside the waste building (see Appendix 1 – Photos 8 and 9) (see AOC #3 listed above). [AOC #4 <i>Enbridge did not demonstrate the length of time universal waste has been accumulating – 40 CFR 273.15 (c)</i>] The inspection team observed a 55-gallon drum of used oil that was about a quarter full that was not labeled as used oil (see Appendix 1 – Photo 4) (see AOC #1 listed above). The inspection team observed three separate instances where spilled used oil was found in the waste building and not properly managed or cleaned up (see Appendix 1 – Photos 5, 13, and 14). [AOC #5– <i>Enbridge did not clean up and manage properly the released used oil – 40 CFR 279.22 (d)(3)</i>] The inspection team also observed several instances where waste was unlabeled and uncharacterized: • One opened half full 5-gallon container of what looked like used oil (see Appendix 1 – Photo 12) • More than 20 5-gallon or smaller containers found on a universal waste shelf and backroom within the			

waste building. The inspection team did not verify the amount in each container due to time and accessibility constraints, but a spot check on several containers determined they were not RCRA empty (see Appendix 1 – Photos 6, 7, 10, and 11).

- The inspection team also observed a mercaptan vessel which was discarded. The vessel was labeled as hazardous waste but was not identified as mercaptan.

The inspection team requested a waste determination performed on all areas discussed above [**AOC #6**– *Enbridge did not make a hazardous waste determination for a solid waste it generated - 40 CFR 262.11*]. On 03/29/2024, Mr. Taylor followed up with an email addressing the waste determinations requested. For the 5-gallon container that was opened, Enbridge stated it was used oil and began to manage it as such. For the various containers found on the universal waste shelf and backroom, Enbridge separated them into two separate groups: used oil and unknown material. All containers were sampled on March 20-21, and Enbridge is awaiting analytical results. The mercaptan vessel was still in the process of being characterized as of 03/29/2024.

In this follow-up email, Enbridge also addressed the used oil areas of concern by cleaning up any used oil spills, consolidating all used oil drums into one location, inspecting the drums integrity, closing each drum, and adding a used oil label. Enbridge also consolidated all free-standing universal waste lamps in packages (see Appendix 2).

Paint Waste Area:

In the paint waste area, the inspection team observed one full 55-gallon drum and three full 5-gallon containers of used oil that were not properly labeled with the words “Used Oil” (see Appendix 1 – Photo 15). [See **AOC #1** listed above – Enbridge did not clearly label containers used to store used oil with the words “Used Oil” - 40 CFR 279.22(c)(1)]. The inspection team also observed three non-empty 55-gallon drums and four pallets of 5-gallon drums of paint and paint related waste that were improperly labeled (see Appendix 1 – Photos 16 through 18). [**AOC #7** – *Enbridge did not clearly label containers used to store waste paint with the words “Universal Waste: Paint and Paint Related Waste – 30 TAC 335.262(c)(2)(F)*].

The inspection team observed a 1-gallon container of two-part epoxy paint with liquid paint residue, approximately one quarter full, still inside in a 55-gallon bin labeled as ‘General Trash’ (see Appendix 1 – Photos 19 to 21). [See **AOC #6** listed above – *Enbridge did not make a hazardous waste determination for a solid waste it generated – 40 CFR 262.11*]

In the follow-up email sent on 03/29/2024, Enbridge explained the staff has reorganized and properly labeled the paint and paint-related waste storage area, ensuring all containers were sealed and positioned correctly, while also removing any potential paint waste from the general plant trash can and ordering signs to enhance identification of the area (see Appendix 2).

Dock Storage Area:

The inspection team observed the dock areas and the dock storage area where a 275-gallon tote was found, which initially was thought to be waste, but was determined to be good diesel product by Enbridge staff (see Appendix 1 – Photo 22). No apparent AOCs were noted at the dock storage area.

The inspection team did not observe other apparent AOCs at the time of the inspection. A closing conference was conducted at approximately 4:10 PM with Enbridge personnel. The AOCs were communicated during the closing.

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: Enbridge Ingleside Oil Terminal		
AOC #1 – Enbridge did not clearly label containers used to store used oil with the words “Used Oil”.	Citation: 40 CFR 279.22(c)(1)	Section: 2.1
AOC #2 – Enbridge did not store universal waste lamps in a container or package that was structurally sound and able to prevent breakage.	Citation: 40 CFR 273.13 (d)(1)	Section: 2.1
AOC #3 – Enbridge did not store universal waste lamps with a label containing one of the following phrases: “Universal Waste—Lamp(s),” or “Waste Lamp(s),” or “Used Lamp(s)”.	Citation: 40 CFR 273.14 (e)	Section: 2.1
AOC #4 – Enbridge did not demonstrate the length of time universal waste had been accumulating.	Citation: 40 CFR 273.15 (c)	Section: 2.1
AOC #5 – Enbridge perform cleanup steps on released used oil.	Citation: 40 CFR 279.22 (d)(3)	Section: 2.1
AOC #6 – Enbridge did not make a hazardous waste determination on solid wastes that it generated.	Citation: 40 CFR 262.11	Section: 2.1
AOC #7 – Enbridge did not clearly label containers used to store waste paint with the words “Universal Waste: Paint and Paint Related Waste.”	Citation: 30 TAC 335.262(c)(2)(F)	Section: 2.1

SECTION V – FOLLOW UP

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

Communication Log

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

1. 03/13/24 Enbridge email – Austin Taylor sent an email confirming the items the inspection team requested.
2. 03/29/24 Enbridge email – Austin Taylor sent a response to the AOCs noted during the inspection with pictures and plans moving forward.

SECTION VI – LIST OF APPENDICES

Appendix 1. Photograph Log

Appendix 2. Enbridge Response on 03/29/24

APPENDIX 1.
PHOTOGRAPH LOG



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 1

Location: Enbridge Ingleside Oil Terminal		
City: Ingleside	County/Parish: San Patricio	State: Texas



Photo File Name: DSCN7135

Date of Photo: 03/13/2024

Time of Photo: 12:35 hrs.

Photographer: Vince Damiano

Description: View of three used oil drums outside of lab which were not labeled with the words 'Used Oil' in the storage area outside the lab.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 2

Location: Enbridge Ingleside Oil Terminal		
City: Ingleside	County/Parish: San Patricio	State: Texas



Photo File Name: DSCN7136

Date of Photo: 03/13/2024

Time of Photo: 12:53 hrs.

Photographer: Vince Damiano

Description View of several universal waste lamps not stored inside a container in the waste building.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY Photograph Log

Photo No. 3

Location: Enbridge Ingleside Oil Terminal

City: Ingleside

County/Parish: San Patricio

State: Texas



Photo File Name: DSCN7137

Date of Photo: 03/13/2024

Time of Photo: 12:53 hrs.

Photographer: Vince Damiano

Description: View of label for universal waste lamps missing waste name inside the waste building.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 4

Location: Enbridge Ingleside Oil Terminal		
City: Ingleside	County/Parish: San Patricio	State: Texas



Photo File Name: DSCN7138

Date of Photo: 03/13/2024

Time of Photo: 12:54 hrs.

Photographer: Vince Damiano

Description: View of free-flowing oil in waste drum that was not labeled as "Used Oil" inside of the waste building.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 5

Location: Enbridge Ingleside Oil Terminal		
City: Ingleside	County/Parish: San Patricio	State: Texas



Photo File Name: DSCN7139

Date of Photo: 03/13/2024

Time of Photo: 12:54 hrs.

Photographer: Vince Damiano

Description: View of spilled oil in secondary containment that was not removed inside the waste building.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 6

Location: Enbridge Ingleside Oil Terminal		
City: Ingleside	County/Parish: San Patricio	State: Texas



Photo File Name: DSCN7140

Date of Photo: 03/13/2024

Time of Photo: 12:57 hrs.

Photographer: Vince Damiano

Description: View of several unlabeled undetermined waste containers in the waste building.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 7

Location: Enbridge Ingleside Oil Terminal		
City: Ingleside	County/Parish: San Patricio	State: Texas

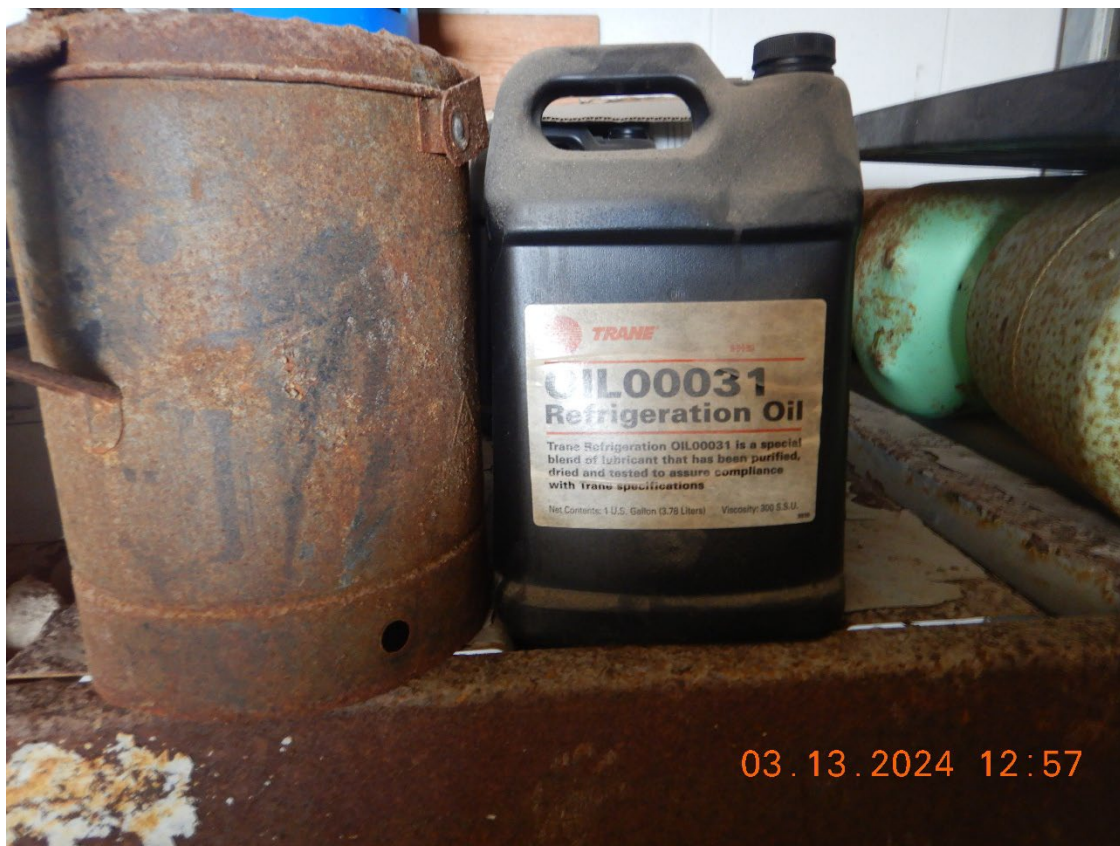


Photo File Name: DSCN7141

Date of Photo: 03/13/2024

Time of Photo: 12:57 hrs.

Photographer: Vince Damiano

Description: View of a refrigeration oil waste container found inside of the waste building.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 8

Location: Enbridge Ingleside Oil Terminal		
City: Ingleside	County/Parish: San Patricio	State: Texas



Photo File Name: DSCN7142

Date of Photo: 03/13/2024

Time of Photo: 13:01 hrs.

Photographer: Vince Damiano

Description: View of two boxes of universal waste lamps with no labels found in the waste building.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 9

Location: Enbridge Ingleside Oil Terminal		
City: Ingleside	County/Parish: San Patricio	State: Texas



Photo File Name: DSCN7143

Date of Photo: 03/13/2024

Time of Photo: 13:01 hrs.

Photographer: Vince Damiano

Description: View one of the boxes of universal waste lamps with no labels not closed found in the waste building.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 10

Location: Enbridge Ingleside Oil Terminal		
City: Ingleside	County/Parish: San Patricio	State: Texas



Photo File Name: DSCN7144

Date of Photo: 03/13/2024

Time of Photo: 13:07 hrs.

Photographer: Vince Damiano

Description: Several unlabeled and open 5-gallon waste drums; contents unknown inside the waste building.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 11

Location: Enbridge Ingleside Oil Terminal		
City: Ingleside	County/Parish: San Patricio	State: Texas



Photo File Name: DSCN7145

Date of Photo: 03/13/2024

Time of Photo: 13:08 hrs.

Photographer: Vince Damiano

Description: One of the unlabeled and open containers seen in Photo 72 inside the waste building.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 12

Location: Enbridge Ingleside Oil Terminal		
City: Ingleside	County/Parish: San Patricio	State: Texas



Photo File Name: DSCN7146

Date of Photo: 03/13/2024

Time of Photo: 13:08 hrs.

Photographer: Vince Damiano

Description: View of open and unlabeled 5-gallon container of used oil inside of the waste building.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 13

Location: Enbridge Ingleside Oil Terminal		
City: Ingleside	County/Parish: San Patricio	State: Texas



Photo File Name: DSCN7147

Date of Photo: 03/13/2024

Time of Photo: 13:11 hrs.

Photographer: Vince Damiano

Description: View of oil residue on the floor in the waste building.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 14

Location: Enbridge Ingleside Oil Terminal		
City: Ingleside	County/Parish: San Patricio	State: Texas



Photo File Name: DSCN7148

Date of Photo: 03/13/2024

Time of Photo: 13:13 hrs.

Photographer: Vince Damiano

Description: View of spilled oil in secondary containment that was not removed in the waste building.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 15

Location: Enbridge Ingleside Oil Terminal		
City: Ingleside	County/Parish: San Patricio	State: Texas



Photo File Name: DSCN7149

Date of Photo: 03/13/2024

Time of Photo: 13:24 hrs.

Photographer: Vince Damiano

Description: View of 55-gallon drum and three 5-gallon containers of used oil that are not properly labeled in the Paint Waste Storage Area.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 16

Location: Enbridge Ingleside Oil Terminal		
City: Ingleside	County/Parish: San Patricio	State: Texas



Photo File Name: DSCN7150

Date of Photo: 03/13/2024

Time of Photo: 13:24 hrs.

Photographer: Vince Damiano

Description: View of many 5-gallon containers of paint waste found unlabeled in the Paint Waste Storage Area.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 17

Location: Enbridge Ingleside Oil Terminal		
City: Ingleside	County/Parish: San Patricio	State: Texas



Photo File Name: DSCN7151

Date of Photo: 03/13/2024

Time of Photo: 13:24 hrs.

Photographer: Vince Damiano

Description: View of many 5-gallon containers of paint waste found unlabeled in the Paint Waste Storage Area.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 18

Location: Enbridge Ingleside Oil Terminal		
City: Ingleside	County/Parish: San Patricio	State: Texas



Photo File Name: DSCN7152

Date of Photo: 03/13/2024

Time of Photo: 13:25 hrs.

Photographer: Vince Damiano

Description: Example of most universal waste paint labels found in the Paint Waste Storage Area.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 19

Location: Enbridge Ingleside Oil Terminal		
City: Ingleside	County/Parish: San Patricio	State: Texas



Photo File Name: DSCN7153

Date of Photo: 03/13/2024

Time of Photo: 13:26 hrs.

Photographer: Vince Damiano

Description: View of 1-gallon can of 2-part epoxy paint with residual liquid paint still inside found in an open trash can labeled "General Trash" in the Paint Waste Storage Area.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 20

Location: Enbridge Ingleside Oil Terminal		
City: Ingleside	County/Parish: San Patricio	State: Texas



Photo File Name: DSCN7154

Date of Photo: 03/13/2024

Time of Photo: 13:26 hrs.

Photographer: Vince Damiano

Description: View of 1-gallon can of 2-part epoxy paint with residual liquid paint still inside found in an open trash can labeled "General Trash" in the Paint Waste Storage Area.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 21

Location: Enbridge Ingleside Oil Terminal		
City: Ingleside	County/Parish: San Patricio	State: Texas



Photo File Name: DSCN7155

Date of Photo: 03/13/2024

Time of Photo: 13:27 hrs.

Photographer: Vince Damiano

Description: View of 1-gallon can of 2-part epoxy paint with residual liquid paint still inside found in an open trash can labeled "General Trash" in the Paint Waste Storage Area.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 22

Location: Enbridge Ingleside Oil Terminal		
City: Ingleside	County/Parish: San Patricio	State: Texas



Photo File Name: DSCN7156

Date of Photo: 03/13/2024

Time of Photo: 13:47 hrs.

Photographer: Vince Damiano

Description: View of unlabeled 275-gallon tote that was determined to be product in the Dock Storage Area.

APPENDIX 2.
ENBRIDGE RESPONSE ON 03/29/24

RE: Follow-up from EPA Visit 3/13/2024

Austin Taylor <austin.taylor@enbridge.com>

Fri 3/29/2024 10:23 AM

To: Vince Damiano <Vince.Damiano@erg.com>

Cc: Andrew Gates <andrew.gates@erg.com>; Johnson, Joyce-R6 <johnson.joyce-r6@epa.gov>; Young-Dahl, Erin <YoungDahl.Erin@epa.gov>; Maegan Saverline <maegan.saverline@enbridge.com>; Preston Bailey <preston.bailey@enbridge.com>; Randy Condra <randy.condra@enbridge.com>; Clayton Curtis <clayton.curtis@enbridge.com>

 1 attachments (1 MB)

Enbridge IOT_EPA Response Letter_As Submitted_2024-03-29.pdf;

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

Good Morning Mr. Damiano,

Please see the attached file outlining Enbridge Ingleside Oil Terminal's response to the email received on 03/13/2024.

If you have any questions, please let me know.

Regards,

Austin Taylor

Sr. Advisor Environment

LP US Gulf Coast Terminals

-

ENBRIDGE

CELL: 361-238-9969 | Austin.Taylor@Enbridge.com

915 North Eldridge Parkway, Suite 1100, Houston, Texas 77079

enbridge.com

Safety. Integrity. Respect. Inclusion

From: Vince Damiano <Vince.Damiano@erg.com>

Sent: Wednesday, March 13, 2024 7:39 PM

To: Austin Taylor <austin.taylor@enbridge.com>

Cc: Andrew Gates <andrew.gates@erg.com>; Johnson, Joyce-R6 <johnson.joyce-r6@epa.gov>; Young-Dahl, Erin <YoungDahl.Erin@epa.gov>; Maegan Saverline <maegan.saverline@enbridge.com>; Preston Bailey <preston.bailey@enbridge.com>; Randy Condra <randy.condra@enbridge.com>; Clayton Curtis <clayton.curtis@enbridge.com>

Subject: [External] Re: Follow-up from EPA Visit 3/13/2024

CAUTION! EXTERNAL SENDER

Were you expecting this email? TAKE A CLOSER LOOK. Is the sender legitimate?

DO NOT click links or open attachments unless you are 100% sure that the email is safe.

Austin - The response can be submitted by COB on 3/29/2024. We are giving facilities a two-week period to respond starting on this Friday (3/15).

Thanks,
Vince

ERG
Vince Damiano
(570) 956-1468

From: Austin Taylor <austin.taylor@enbridge.com>
Sent: Wednesday, March 13, 2024 7:03:48 PM
To: Vince Damiano <Vince.Damiano@erg.com>
Cc: Andrew Gates <andrew.gates@erg.com>; Johnson, Joyce-R6 <johnson.joyce-r6@epa.gov>; Young-Dahl, Erin <YoungDahl.Erin@epa.gov>; Maegan Saverline <maegan.saverline@enbridge.com>; Preston Bailey <preston.bailey@enbridge.com>; Randy Condra <randy.condra@enbridge.com>; Clayton Curtis <clayton.curtis@enbridge.com>
Subject: RE: Follow-up from EPA Visit 3/13/2024

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

Good evening sir,

We have received your communication. Based on my notes, we have two weeks to demonstrate the facility has either rectified, or made substantial efforts to rectify, the initial areas of concern. If this is correct, we will submit a response by COB 03/27/2024.

Can you please confirm my statement above.

Regards,

Austin Taylor

Sr. Advisor Environment
LP US Gulf Coast Terminals
-

ENBRIDGE

CELL: 361-238-9969 | Austin.Taylor@Enbridge.com
915 North Eldridge Parkway, Suite 1100, Houston, Texas 77079

enbridge.com

Safety. Integrity. Respect. Inclusion

From: Vince Damiano <Vince.Damiano@erg.com>
Sent: Wednesday, March 13, 2024 4:54 PM
To: Maegan Saverline <maegan.saverline@enbridge.com>; Austin Taylor <austin.taylor@enbridge.com>; Robert Thurman <robert.thurman@enbridge.com>; Preston Bailey <preston.bailey@enbridge.com>
Cc: Andrew Gates <andrew.gates@erg.com>; Johnson, Joyce-R6 <johnson.joyce-r6@epa.gov>; Young-Dahl, Erin <YoungDahl.Erin@epa.gov>
Subject: [External] Follow-up from EPA Visit 3/13/2024

CAUTION! EXTERNAL SENDER

Were you expecting this email? TAKE A CLOSER LOOK. Is the sender legitimate?

DO NOT click links or open attachments unless you are 100% sure that the email is safe.

Hello All,

I am following up with a list of items and notes from our inspection today. Below are initial Areas of Concern and items requested:

- Follow-up used oil management and missing or incomplete used oil labels (e.g. 55-gallon drums in lab, open 5-gallon bucket of oil, secondary containment pallets, containers in paint waste area, spills in waste storage area, and several containers throughout the waste storage area).
- Waste determinations:
 - 5-gallon bucket that was opened.
 - Containers were found on shelf and backroom in waste storage area.
 - Mercaptan
- Follow-up on missing/improper labeling on universal waste lamps.
- Follow-up on universal waste paint labeling and management issues (pallets of paint in paint storage, 55-gallon drums, general trash can with open paint waste)

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,
Vince



Vince Damiano

Chemical Engineer, Chantilly Office

Cell: (570) 956-1468

Vince.Damiano@erg.com



Enbridge Ingleside Oil Terminal
1450 Lexington Blvd., Bldg. 300
Ingleside, TX 78362

March 29, 2024

EMAIL

Mr. Vince Damiano
Chemical Engineer
Chantilly Office, Eastern Research Group, Inc.

RE: Response to Initial Areas of Concern
Enbridge Ingleside Oil Terminal (EIOT)
1450 Lexington Boulevard
Ingleside, San Patricio County, Texas 78362

Mr. Damiano,

The purpose of this letter is to provide the United States Environmental Protection Agency (USEPA) Region 6 and its contractor Eastern Research Group, Inc. (ERG), a response to the email received on March 13, 2024, in the referenced matter. The email outlined four initial areas of concern that were observed during an unannounced MARPOL waste audit conducted at the EIOT on March 13, 2024. The aforementioned email is included as Attachment A. The email listed the following initial areas of concern:

- Follow-up on used oil management and missing or incomplete used oil labels,
- Waste determinations on 3 items,
- Follow-up on missing/improper labeling on universal waste lamps, and
- Follow-up on universal waste paint labeling and management issues.

EIOT is pleased to provide documentation of actions taken to rectify the initial areas of concern in Attachment B. If you have any questions concerning this response and the information within, please do not hesitate to contact me at 361-238-9969 or by email at Austin.Taylor@Enbridge.com.

Sincerely,

Austin Taylor
Sr. Advisor, Environment
Enbridge US Gulf Coast Terminals

Cc: via email:

Preston Bailey, Manager, Terminal, EIOT: Preston.Bailey@Enbridge.com
Clayton Curtis, Director, Regulatory Affairs, Enbridge USCG Terminals: Clayton.Curtis@Enbridge.com
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Attachment A

Email Communication from Vince Damiano, Chemical Engineer with ERG, Inc.

Austin Taylor

From: Vince Damiano <Vince.Damiano@erg.com>
Sent: Wednesday, March 13, 2024 4:54 PM
To: Maegan Saverline; Austin Taylor; Robert Thurman; Preston Bailey
Cc: Andrew Gates; Johnson, Joyce-R6; Young-Dahl, Erin
Subject: [External] Follow-up from EPA Visit 3/13/2024

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Hello All,

I am following up with a list of items and notes from our inspection today. Below are initial Areas of Concern and items requested:

- Follow-up used oil management and missing or incomplete used oil labels (e.g. 55-gallon drums in lab, open 5-gallon bucket of oil, secondary containment pallets, containers in paint waste area, spills in waste storage area, and several containers throughout the waste storage area).
- Waste determinations:
 - 5-gallon bucket that was opened.
 - Containers were found on shelf and backroom in waste storage area.
 - Mercaptan
- Follow-up on missing/improper labeling on universal waste lamps.
- Follow-up on universal waste paint labeling and management issues (pallets of paint in paint storage, 55-gallon drums, general trash can with open paint waste)

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,
Vince



Vince Damiano

Chemical Engineer, Chantilly Office

Cell: (570) 956-1468

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Attachment B

Documentation of Corrective Actions to Rectify Initial Areas of Concern

Responses for each initial area of concern are listed below with **Enbridge Ingleside Oil Terminal's (EIOT) response in bolded, red text.**

General Comments:

Following the audit performed by USEPA Region 6 & ERG on March 13, 2024, Enbridge staff took action to rectify the initial areas of concern. Responses to specific items are outlined below, however, Enbridge staff recognized certain overarching areas for improvement in how waste is managed at the facility.

On March 20, 2024, Enbridge staff held a meeting with the facility manager, operations, maintenance, pipeline, & environmental department leads to discuss the audit, the initial areas of concern, and how to proceed. Through this meeting and additional internal discussions, Enbridge staff have agreed the following steps should be undertaken:

- Analysis of the efficacy of the existing waste management program,
- Identification of a new waste management building location,
- Clearer identification of those having access to the waste storage building,
- Development of a voluntary waste storage building inspection schedule, and
- Additional instructor-led training for all staff officed at EIOT.

Enbridge staff have initiated actions to achieve these items.

Specific Initial Areas of Concern Comments:

1. Follow-up used oil management and missing or incomplete used oil labels

On March 14, 2024, Enbridge staff identified all used oil within the facility. All containers holding used oil were pulled together and placed within the EIOT waste storage building. Each container was inspected for container integrity and a "Used Oil" label was completed and fixed to each container. Any open container was sealed with a compatible lid. Freestanding liquids in secondary containment pallets were transferred to labelled 55-gallon drums.

Enbridge staff contacted Western Gulf Recycling (WGR, EPA ID: TXR000084361) on March 14, 2024, to sample all used oil containers at the facility. WGR staff pulled samples from all containers on March 19, 2024, and March 21, 2024. Once WGR has performed analysis on all samples, WGR will transport accepted materials from EIOT to their Corpus Christi facility for used oil recycling.

WGR did inform Enbridge staff that any used oil that did not meet their analytical criteria would not be accepted and would not be removed from EIOT by WGR. Enbridge staff subsequently met with Republic Services (Republic) staff on March 27, 2024, to discuss additional used oil recycling capabilities that Republic may offer.

Enbridge will maintain all appropriate used oil management measures and labeling going forward. To assist Enbridge staff in meeting this goal, a reoccurring work order was created in the work order system (eMaint) to ensure used oil is removed from the facility on a semi-annual basis.

Figure 1, located below, demonstrates certain efforts taken to rectify the used oil management concern.



Figure 1: Used oil staging area.

2. Waste Determinations:

- a. 5-gallon bucket that was opened

On March 13, 2024, Enbridge staff identified the open 5-gallon bucket and placed a lid on the container. The 5-gallon bucket is believed to be used oil based on its physical properties. WGR staff sampled this 5-gallon bucket on March 21, 2024. WGR sampled for halogen content, water content, solids content, and ignitability. Enbridge staff were waiting on analytical results from WGR as of March 29, 2024.

- b. Containers on shelf & backroom in waste storage building

On March 14, 2024, Enbridge staff identified the assorted containers on the shelf and back room. Each container was inspected for a label to assist with determination of the contents and characteristics. Based on these observations, materials were separated onto two separate pallets: used oil pallet & unknown material pallet.

The materials on the used oil pallet were sampled by WGR staff on March 21, 2024. WGR sampled for halogens, water and solids content, and ignitability. Enbridge staff were waiting on analytical results from WGR as of March 29, 2024.

The materials on the unknown material pallet were inspected by Miller on March 20, 2024, and Republic on March 27, 2024, to assess the materials and determine a scope of work. These companies are developing proposals for on-site waste characterizations and lab packs for transportation to an authorized disposal facility. Enbridge staff were waiting on proposals from Miller and Republic WGR as of March 29, 2024.

c. Mercaptan

On March 13, 2024, Enbridge staff identified the mercaptan vessel in the EIOT waste storage building. The mercaptan vessel was inspected by Miller on March 20, 2024, and Republic on March 27, 2024, to assess the materials and scope of work. These companies are developing proposals for management, characterization and potential disposal options of the mercaptan vessel. Enbridge staff were waiting on proposals from Miller and Republic WGR as of March 29, 2024. The mercaptan will also be evaluated for recycling or use in a natural gas system.

3. Follow-up on missing/improper labeling on universal waste lamps

On March 14, 2024, Enbridge staff identified all universal waste lamps within the facility. All universal waste lamps were pulled together and relocated to a staging area within the EIOT waste storage building. Any exposed universal waste lamps that were not securely stored in boxes were placed into boxes. A satellite storage area will be located in all commonly used buildings where lamps are collected to facilitate collection and transfer to the designated waste storage area in the waste storage building.

Enbridge staff contacted Veolia North America (Veolia) on March 15, 2024, to identify universal waste lamp disposal options. Enbridge and Veolia staff are currently coordinating a universal waste pickup from EIOT which will include universal waste lamps, universal waste batteries, and universal waste aerosol cans.

Enbridge has also reached out to a local sign maker to make a sign 3' x 3', with a purple background consistent with the standard Universal Waste label with the following text: "Universal Waste – Lamps". This sign has been ordered and will be permanently fixed to a section dedicated to universal waste lamps within the EIOT waste storage building.

Enbridge will maintain appropriate universal waste lamp management and labeling going forward. To assist Enbridge staff in meeting this goal, a reoccurring work order was created in eMaint to ensure universal waste lamps are removed from the facility on an annual basis.

4. Follow-up on universal waste paint labeling and management issues

On March 19, 2024, Enbridge staff identified all paint and paint related waste (PPRW) within the PPRW storage area. All containers within the PPRW storage area were pulled out and reorganized to better identify & manage. All drums were placed in secondary containment and on the right side of the PPRW storage area. All 5-gallon buckets were placed on pallets on the left side of the PPRW storage area. All containers were properly sealed with correct lids or bung fittings. Universal waste labels were completed and fixed to each drum.

The 55-gallon general plant trash can was removed from PPRW storage area. Any potential PPRW that may have been in the general plant trash can was removed and relocated to a container within the PPRW storage area.

Enbridge has ordered two signs to enhance the identification of the PPRW storage area. These signs are 3' x 3' and have contrasting colors with the following text: "Paint & Paint Related Waste ONLY".

Enbridge is contracting Miller to pack and transport all the PPRW to US Ecology in Robstown, Texas for disposal. US Ecology (EPA ID: TXD069452340) is a permitted and authorized disposal facility for PPRW. Enbridge staff will create a reoccurring work order in its work order system to ensure PPRW is removed from the facility on an annual basis.

Figure 2, located below, illustrates the PPRW storage area as of March 29, 2024, and demonstrates the efforts taken to rectify the initial area of concern.



Figure 2: Universal waste paint & paint related waste storage area.