

INSPECTION REPORT

Inspection Entry Date/Time	07/17/2024 09:19 (CT)		Announced: No (tenants and related facilities)	
Inspection Exit Date/Time	07/17/2024 10:00(CT)		Access: Granted	
Regulatory Program	RCRA			
Type of Inspection	Focused Compliance Inspection (FCI)			
Facility or Site Name	Turn Services LLC			
Facility/Site Identifier	N/A			
Facility/Site Physical Address	3800 Patterson Dr.			
City, State, Zip Code	New Orleans, LA 70117			
County/Borough	Orleans Parish			
Generator Status	N/A			
NAICS	483211			
Type of Operation	Turn Services LLC (Turn Services) operates as a barge fleeting station where barges are staged in between services.			
Geographic Coordinates	29.94336, -90.01376			
Additional Persons Participating in Inspection:				
Name	Title	Organization	Email	Phone
Dedriel Gardner	Inspector	EPA REGION 6	Gardner.Dedriel@epa.gov	(281) 983-2133
Joe Watson	Contractor	Eastern Research Group (ERG)	Joe.Watson@erg.com	(215) 891-6615
Lead Inspector:				
Vince Damiano				
	ERG	Vince.Damiano@erg.com	(703) 835-6281	

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

The Port of New Orleans 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, 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) 835-6281	Vince.Damiano@erg.com	Yes	Yes
RCRA Inspector/ Contractor/ERG	Joe Watson	(215) 891-6615	Joe.Watson@erg.com	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
Turn Services LLC	07/17/24	Turn Services LLC (Turn Services) operates as a barge fleeting station where barges are staged in between services. They also conduct minor barge repairs and taxi barge crews. Turn Services does not maintain a MARPOL COA.	No

SECTION II – OBSERVATIONS

Tenant: Turn Services LLC			
Section: 2.1	Date: 07/17/24, 09:19 AM	Contains AOC: No	Contains CBI: No
Lead Inspector: Vince Damiano	Attendees: Shawn Lingaw (Safety), Sean Hayman (Safety), Thomas Cagle (VP HSSE)		
Turn Services operates as a barge fleeting station where barge crews park their vessels for crew changes or supplies. Their dock space acts as a staging area for barges and tow boats in between services. Turn Services also conducts small repairs such as fiberglass repairs for small cracks or minor steel jobs on their fleet. Mr. Cagle stated no waste is accepted from barges or boats at their dock space. Turn Services does not maintain a MARPOL COA or EPA ID. Following the opening conference, the inspection team conducted a visual inspection of Turn Services’ dock space. The dock was mostly empty space, with some supplies and tools for their operations. The inspection team did not observe any areas of concern at the time of the inspection; however, further EPA review may add to their potential AOCs. The inspection team inquired about any waste that may be produced from Turn Services small fiberglass repairs and Mr. Cagle stated he was not aware of any waste being produced because the repairs at this location were minor. A closing conference was conducted at approximately 10:00 AM with Turn Services. Following the inspection, the inspection team requested any documentation or records related to the last three fiberglass repairs performed at this Turn Services location. Mr. Cagle responded on 07/24 stating this location has not performed any fiberglass repairs since taking over the lease approximately 5 years ago (See Appendix 1).			

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.

Communication Log

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

1. 07/24/24 Turn Services email – Mr. Cagle provided the inspection team with a response regarding fiberglass repairs.

SECTION VI – LIST OF APPENDICES

Appendix 1. Turn Services Email Response on 7/24/2024

APPENDIX 1.
TURN SERVICES EMAIL RESPONSE ON 7/24/2024

RE: Follow-up From EPA Visit on 7/17

Thomas Cagle <thomas@associatedterminals.com>

Wed 7/24/2024 5:04 PM

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

Cc: Joe Watson <Joe.Watson@erg.com>; Gardner, Dedriel <Gardner.Dedriel@epa.gov>

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

Good afternoon,
Please see the responses to the information requested below.

- Please confirm your RCRA EPA ID Number and generator status, if you have one
 - Turn Services does not have a RCRA EPA Id respective to the Dockside location. That location is not a waste generator as the general use of that location is for barge fleeting.
- Please confirm you have a MARPOL Certificate of Adequacy
 - Turn Services does not have a MARPOL Certificate of Adequacy for the Dockside location.
- Any documents or record related to the last three fiberglass repair jobs you have performed
 - Although the Dockside location has the ability to perform fiberglass repair, that location has not performed any fiberglass repairs since taking over the lease approximately 5 years ago. The primary function of the Dockside location is to fleet (stage) barges.

Thomas Cagle, CSP, CSHM

Vice President of HSSE & Training

ASSOCIATED TERMINALS/TURN SERVICES

9100 Safety Drive

Convent, LA 70723

C: 225.268.1084

E: thomas@associatedterminals.com

W: www.associatedterminals.com

W: www.turnservices.com



[Book time to meet with me](#)

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

Sent: Wednesday, July 17, 2024 8:01 PM

To: Thomas Cagle <thomas@associatedterminals.com>; sean.hayman@turnservice.com; shawn.lingaw@turnservice.com

Cc: Joe Watson <Joe.Watson@erg.com>; Gardner, Dedriel <Gardner.Dedriel@epa.gov>

Subject: Follow-up From EPA Visit on 7/17

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:

- Please confirm your RCRA EPA ID Number and generator status, if you have one
- Please confirm you have a MARPOL Certificate of Adequacy
- Any documents or record related to the last three fiberglass repair jobs you have performed

Initial Areas of Concern. You may follow-up with pictures, write-ups, sample results, or however you see fit.

- None

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.

Thanks,
Vince



Vince Damiano

Chemical Engineer, Chantilly Office

Cell: (570) 956-1468

Vince.Damiano@erg.com

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