

INSPECTION REPORT

Inspection Entry Date/Time	11/06/2024 14:00 (CT)			Announced: No (tenants and related facilities)
Inspection Exit Date/Time	11/06/2024 15:30 (CT)			Access: Granted
Regulatory Program	RCRA			
Type of Inspection	Focused Compliance Inspection (FCI)			
Facility or Site Name	Martin Operating Partnership LP			
Facility/Site Identifier	TXR000060909			
Facility/Site Physical Address	10 Sulfur Plant Rd.			
City, State, Zip Code	Beaumont, TX 77701			
County/Borough	Jefferson County			
Generator Status	Very Small Quantity Generator (VSQG)			
NAICS	42471			
Type of Operation	Martin Operating Partnerships LP is a storage terminal facility for chemical products including molten sulfur, crude oil, sulfuric acid, and asphalt.			
Geographic Coordinates	30.0294, -94.0566			
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	Vincent Damiano	Digitally signed by Vincent Damiano Date: 2025.02.06 11:28:13 -05'00'	02/06/2025
	ERG	Vince.Damiano@erg.com		(703) 633-1732

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

The Port 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 (see Appendix 1), 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	(469) 616-8578	Thapa.Sandesh@epa.gov	Yes	Yes
RCRA Inspector/ Contractor/ERG	Jon Herbay	(412) 780-9931	Jon.Herbay@erg.com	Yes	Yes
Martin Operating Partnership, LP	Josh Tallina	(409) 790-3424	Joshua.Tallina@MartinCP.com	Yes	Yes
Martin Operating Partnership, LP	James Alford	(409) 673-9423	James.Alford@MartinCP.com	Yes	Yes

Facility General Description

Tenant/Area	Inspection Date	Process Description	Area of Concern
Martin Operating Partnership LP	11/06/24	Martin Operating Partnership LP (MOP) is a storage terminal facility for chemical products including molten sulfur, crude oil, sulfuric acid, and asphalt. MOP moves products via trucks, barges, ships, and rail cars. The facility maintains a MARPOL COA for annexes I, II, and V.	Yes

SECTION II – OBSERVATIONS

Tenant: Martin Operating Partnership LP			
Section: 2.1	Date: 11/06/24, 2:00 PM	Contains AOC: Yes	Contains CBI: No
Lead Inspector: Vince Damiano	Attendees: Josh Tallina (Operations Superintendent), James Alford (Terminal Manager)		
MOP is located in Beaumont, TX, and operates as a storage terminal facility for chemical products including molten sulfur, crude oil, sulfuric acid, and asphalt. Mr. Alford explained how each product is transported in and out of the facility. Molten sulfur is shipped in by truck and rail while being shipped out by ship and barge. Crude oil is shipped in by truck and shipped out by barge. Sulfuric acid is shipped in and out by truck, rail, and barge. Asphalt is shipped in and out by truck, rail, and barge. The facility stores products in 10 tanks ranging in storage capacity from 25,000 to 85,000 barrels. The facility maintains a MARPOL COA through the U.S. Coast Guard but said it does not allow transfers of waste over its dock spaces. The company does allow third-party launch services to remove waste from vessels over the water. However, they are not involved in this process as it relies on the ship and the ship’s agent. MOP is registered with the EPA and operates as a VSQG of hazardous waste (TXR000060909). Upon finishing the opening conference, the inspection team observed MOP’s dock space and chemical storage area. The inspection team first arrived at Dock 1 and found one half-full 55-gallon drum and one three-quarter-full 55-gallon drum at the base of the dock entrance (see Appendix 1—Photos 1 to 2). MOP representatives were unsure what was in the drums but stated they believed it was left from contractors on site. The drums were unlabeled at the time of the inspection. The inspection team requested a waste determination on the drums [AOC #1 – MOP did not make a hazardous waste determination – 40 CFR 262.11]. No other areas of concern (AOCs) were found at MOP’s dock space. The inspection team moved to the chemical storage area where MOP informed the inspection team they are storing several totes of acid waste. Upon entering the chemical storage area, the inspection team observed nine 300-gallon totes ranging in capacity from one-quarter full to completely full (see Appendix 1 – Photos 3 to 13). Four of the totes were sodium hydroxide products used in MOPs neutralization process. The other five totes were sulfuric acid and water waste generated from a valve leak and clean up activity (Appendix 1 – Photos 3 to 7). MOP representatives stated the acid waste in these drums will be neutralized using soil and hydrated lime before they are shipped off as non-hazardous waste, but the representatives stated they are waiting until they have enough acid waste to do one batch neutralization. The inspection team requested a hazardous waste determination because MOP representatives did not definitively state if they were managing the acid wastewater as hazardous waste or not (see AOC#1). On 11/21/24 following the inspection, MOP followed up with determination stating the acid waste was hazardous generated from an episodic event			

that began on 11/05/2024. The notification form is included in Appendix 4.

The inspection team did not observe other 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 3:20 PM with MOP personnel. The AOCs were communicated during the closing.

On 11/21/24, Mr. Scott Ranalli (MOP Environmental personnel), sent a response letter to the inspection team addressing the AOCs observed during the inspection (see Appendix 2):

- The two 55-gallon drums observed by Dock 1 were determined to be oily water drums originated from Martin Marine, whose vessel LaForce and barge Margaret Sue transported them to Martin Energy's Port Arthur Dock for used oil storage, with plans for Holcomb Company to recycle the fluids once the tank nears capacity. Non-hazardous material manifest and the Used Oil Registration information for the Port Arthur Dock are presented in Appendix 3.
- The used sulfuric acid tote fluids resulted from a leaking tank valve, with the acid mixing with rainwater within the containment area. The fluids were temporarily stored in totes, then neutralized with clean soil and hydrated lime to a non-hazardous pH. The resulting solids will be solidified and disposed of at the Republic Services Golden Triangle Facility. Photos of the affixed hazardous waste labels on totes of acid waiting to be naturalized and copies of the Waste Determination Form, sulfuric acid SDS, STEERs state waste code entry, and Episodic Notification for Regulated Generators form are in Appendix 4. The Neutralized Sulfuric Acid profile, analytical, and hydrated lime SDS are provided in Appendix 5.
- The MARPOL COA and vapor combustion unit approval are included in Appendix 6.
- A copy of the registration information for the Acid Neutralization Waste Treatment Unit is in Appendix 7.

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: Martin Operating Partners LP		
AOC #1 – MOP did not make a hazardous waste determination.	Citation: 40 CFR 262.11	Section: 2.1

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. 11/21/24 MOP email – Scott Ranalli sent follow up photos and documents responding to the AOCs observed during the inspection.

SECTION VI – LIST OF APPENDICES

Appendix 1. Photograph Log

Appendix 2. MOP 11/21/24 Response

Appendix 3. Non-Hazardous Material Manifest

Appendix 4. Spent Sulfuric Acid Waste Determination and Episodic Event Form

Appendix 5. Neutralized Sulfuric Acid Profile

Appendix 6. MARPOL COA and Vapor Combustion Unit Approval

Appendix 7. Acid Neutralization Waste Treatment Unit Registration

APPENDIX 1.
PHOTOGRAPH LOG



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 1

Location: Martin Operating Partnership LP		
City: Beaumont	County/Parish: Jefferson	State: Texas



Photo File Name: DSCN7665

Date of Photo: 11/06/2024

Time of Photo: 14:57 hrs.

Photographer: Vince Damiano

Description: View of a half-full 55-gallon drum found on the shore at Dock 1 which was storing unidentified liquid at the time of the inspection.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 2

Location: Martin Operating Partnership LP		
City: Beaumont	County/Parish: Jefferson	State: Texas



Photo File Name: DSCN7666

Date of Photo: 11/06/2024

Time of Photo: 14:57 hrs.

Photographer: Vince Damiano

Description: View of a 3/4 full 55-gallon drum found on the shore at Dock 1 which was storing unidentified liquid at the time of the inspection.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 3

Location: Martin Operating Partnership LP		
City: Beaumont	County/Parish: Jefferson	State: Texas



Photo File Name: DSCN7667

Date of Photo: 11/06/2024

Time of Photo: 15:09 hrs.

Photographer: Vince Damiano

Description: View of a full 300-gallon tote found in the chemical storage area that was storing diluted sulfuric acid corrosive waste.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 4

Location: Martin Operating Partnership LP		
City: Beaumont	County/Parish: Jefferson	State: Texas



Photo File Name: DSCN7668

Date of Photo: 11/06/2024

Time of Photo: 15:10 hrs.

Photographer: Vince Damiano

Description: View of a full 300-gallon tote found in the chemical storage area that was storing diluted sulfuric acid corrosive waste.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 5

Location: Martin Operating Partnership LP		
City: Beaumont	County/Parish: Jefferson	State: Texas



Photo File Name: DSCN7669

Date of Photo: 11/06/2024

Time of Photo: 15:10 hrs.

Photographer: Vince Damiano

Description: View of a $\frac{3}{4}$ full 300-gallon tote found in the chemical storage area that was storing diluted sulfuric acid corrosive waste.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 6

Location: Martin Operating Partnership LP		
City: Beaumont	County/Parish: Jefferson	State: Texas



Photo File Name: DSCN7670

Date of Photo: 11/06/2024

Time of Photo: 15:11 hrs.

Photographer: Vince Damiano

Description: View of a ¼ full 300-gallon tote found in the chemical storage area that was storing diluted sulfuric acid corrosive waste.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 7

Location: Martin Operating Partnership LP		
City: Beaumont	County/Parish: Jefferson	State: Texas



Photo File Name: DSCN7671

Date of Photo: 11/06/2024

Time of Photo: 15:11 hrs.

Photographer: Vince Damiano

Description: View of a full 300-gallon tote found in the chemical storage area that was storing diluted sulfuric acid corrosive waste.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 8

Location: Martin Operating Partnership LP		
City: Beaumont	County/Parish: Jefferson	State: Texas

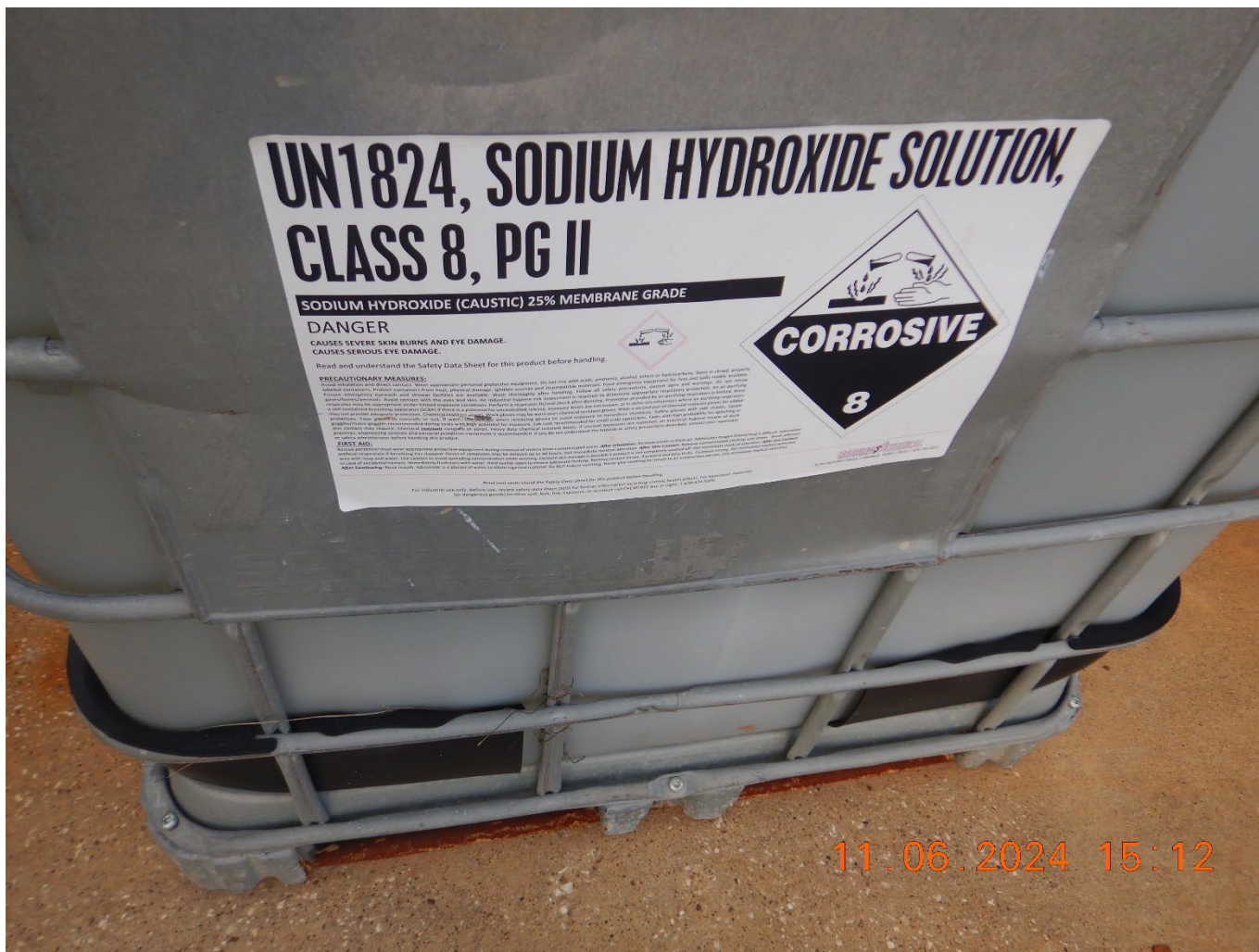


Photo File Name: DSCN7672

Date of Photo: 11/06/2024

Time of Photo: 15:12 hrs.

Photographer: Vince Damiano

Description: View of a product label on a tote of sodium hydroxide solution found in the chemical storage area.
This material is a product.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 9

Location: Martin Operating Partnership LP		
City: Beaumont	County/Parish: Jefferson	State: Texas



Photo File Name: DSCN7673

Date of Photo: 11/06/2024

Time of Photo: 15:12 hrs.

Photographer: Vince Damiano

Description: View of a product tote of sodium hydroxide solution found in the chemical storage area.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 10

Location: Martin Operating Partnership LP		
City: Beaumont	County/Parish: Jefferson	State: Texas



Photo File Name: DSCN7674

Date of Photo: 11/06/2024

Time of Photo: 15:12 hrs.

Photographer: Vince Damiano

Description: View of a product label on a tote of sodium hydroxide solution found in the chemical storage area.
This material is a product.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 11

Location: Martin Operating Partnership LP		
City: Beaumont	County/Parish: Jefferson	State: Texas



Photo File Name: DSCN7675

Date of Photo: 11/06/2024

Time of Photo: 15:12 hrs.

Photographer: Vince Damiano

Description: View of a product tote of sodium hydroxide solution found in the chemical storage area.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 12

Location: Martin Operating Partnership LP		
City: Beaumont	County/Parish: Jefferson	State: Texas



Photo File Name: DSCN7676

Date of Photo: 11/06/2024

Time of Photo: 15:14 hrs.

Photographer: Vince Damiano

Description: Overview of the nine 300-gallon totes found inside the chemical storage area.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 13

Location: Martin Operating Partnership LP		
City: Beaumont	County/Parish: Jefferson	State: Texas



Photo File Name: DSCN7677

Date of Photo: 11/06/2024

Time of Photo: 15:14 hrs.

Photographer: Vince Damiano

Description: Overview of the nine 300-gallon totes found inside the chemical storage area.

APPENDIX 2.
MOP 11/21/24 RESPONSE

MARTIN
OPERATING PARTNERSHIP
Environmental Department
Three Riverway, Suite 400
Houston, Texas 77056

November 21, 2024

Mr. Vince Damiano
ERG – Chantilly Office
703-835-6281

RE: **Stanolind Cut Terminal**

Email: 'Follow-Up from EPA Visit on 11/6'

SWR: **87582**

Dear Mr. Damiano:

This letter serves as a response to questions raised by EPA proxy representatives on Tuesday 11/05/2024, at the Martin Operating – Stanolind Cut Terminal. The indicated representatives (from the ERG company), arrived on a “spot visit” and raised questions regarding waste storage, and related items, at the Martin facility. A follow-up e-mail on 11/07/2024, from ERG’s Vince Damiano to Martin’s James Alford listed the questionable items. A copy of the e-mail is provided as **Attachment A**.

These items are summarized and addressed below:

Stanolind Cut – Items of Concern

- *Waste determinations on two 55-gallon drums found by Dock 1.*

The oily water drums were determined to originate from Martin Marine, another subsidiary of the Martin Companies. Martin Marine vessel ‘LaForce’ (and its accompanying barge, ‘Margaret Sue’) picked-up the drums and transported them to the Martin Energy – Port Arthur Dock for storage in their used oil tank. When the tank approaches capacity, the Holcomb company shall transport the fluids to their facility for recycling to one of their customers.

Copies of the non-hazardous material manifest and the Used Oil Registration information for the Port Arthur Dock are presented as **Attachment B**.

- *Labeling issues on seven totes of acid or base found in drum storage area. Please provide a waste determination on these drums and a written statement on how this waste is generated, rate of generation, any SDS sheets or analytical data you have for these totes, how they are currently being managed, how they are disposed of, and/or other information you deem necessary.*

The Used Sulfuric Acid tote fluids were the result of a leaking tank valve. When operators went to repair or replace the valve seal, it was noted that the acid had leaked into standing rainwater within the containment. The spent acid fluids were pumped into the totes for temporary storage. The fluids shall be mixed with clean soil and hydrated lime to neutralize the material to non-hazardous pH. The resulting solids and sludge shall be transported for solidification and landfill disposal at the Republic Services Golden Triangle Facility.

Photos of the affixed hazardous waste labels and copies of the Waste Determination Form, sulfuric acid SDS, STEERs state waste code entry, and Episodic Notification for Regulated Generators form are presented in **Attachment C**. Copies of the Neutralized Sulfuric Acid profile, analytical, and hydrated lime SDS are provided in **Attachment D**.

The base materials noted at the Facility are in active use and not a waste material. And they are properly labeled, as provided by the manufacturer.

- *EPA ID*

TXR000060909

- *MARPOL COA*

A copy of the professional engineer approval letter for operation of the VCU unit is presented as **Attachment E**.

- *Any permits you may have related to neutralization of your acid waste*

A copy of the registration information for the Acid Neutralization Waste Treatment Unit, is presented as **Attachment F**.

Please review the attached paperwork and contact me at (713) 350-6827, if you have any questions or comments.

Sincerely,

Scott Ranalli

Scott Ranalli

Sr. Environmental Specialist, Corporate EH&S

cc: Mr. James Alford – Beaumont Terminals Manager
Martin Files

Enclosure

APPENDIX 3. NON-HAZARDOUS MATERIAL MANIFEST

NON-HAZARDOUS MATERIAL MANIFEST – NOT NEGOTIABLE

319376

GENERATOR INFORMATION

1. GENERATOR NAME & ADDRESS
Name: MARTIN MARINE
Street Address: 2904 N 23RD ST
City, ST ZIP Code: LA PORTE, TX 77571
Telephone No.: 281-471-2211
US EPA #:

4. MANIFEST NO.:

MANF319376



2. GENERATOR SITE: RIG OR VESSEL INFORMATION
Name: LA FORCE
Street Address: MARGRET SUE
City, ST ZIP Code: TX
Telephone No.: 281-413-4502
US EPA #:

5. CONTAINER IDENTIFICATION NUMBER(S), (SECURITY TAG#):

- a)
- b)
- c)
- d)
- e)

3. PICK UP LOCATION
Name: MARTIN GAS
Street Address: 10 SULPHUR PLANT RD
City, ST ZIP Code: BEAUMONT, TX 77705

6. TRUCK #

9. CARGO MANIFEST #

7. BRANCH #

10. AFE/REQ/DTR/FR #

8. TCEQ#

11. TNRCC #

IN CASE OF SPILL, FIRE, LEAK OR OTHER EMERGENCY CALL MARTIN ENERGY SERVICES TOLL FREE (800) 962-8307

CUSTOMER ORDER INFORMATION

12. Description of Waste	13. # of Containers	14. Container Size	15. Total Qty.	16. Unit Wt./Vol.	17. Additional Information
a) OILY WATER	2	1/55	10	GAL	
b)					
c)					
d)					
e)					

GENERATOR INFORMATION

Generator represents, warrants and covenants that the waste delivered to the service provider (Martin) at its designated facility hereunder will be acceptable waste and will not contain any unacceptable quantity of regulated hazardous waste not disclosed within waste characterization and waste profile documents submitted prior for approval before waste is removed from generation point. The material must also not contain any radioactive materials or substances, or toxic waste or substances, as defined by applicable Federal, State and Local laws and regulations without prior approval and profile documentation from service provider. Any waste which does not meet these requirements shall hereinafter be referred to as "Unacceptable Waste". I certify that the materials described above on this Manifest are not subject to Federal regulations for reporting proper disposal of Hazardous Waste.

18. GENERATOR PRINTED/TYPED NAME	SIGNATURE	MO. DAY YR.
GREG PEABODY	GREG PEABODY	11-7-24

TRANSPORTER INFORMATION

19. TRANSPORTER 1 PRINTED/TYPED NAME	FACILITY US EPA #	SIGNATURE	MO. DAY YR.
PETER BRENT ICE		PETER BRENT ICE	11-7-24
MMLP 2601		[Signature]	
20. TRANSPORTER 2 PRINTED/TYPED NAME	FACILITY US EPA #	SIGNATURE	MO. DAY YR.

DESTINATION FACILITY INFORMATION

Designated Facility Owner or Operator: Certification of Receipt of materials covered by the manifest

21. PRINTED/TYPED NAME	SIGNATURE	MO. DAY YR.
FACILITY NAME	FACILITY ADDRESS	FACILITY US EPA #



Martin Energy Services LLC
Three Riverway, Suite 400
Houston, Texas 77056
(800) 962-8307

YARD TICKET

NO. **295883**

YTK295883



Terminal Location & Code **PA DOCK 17** ☐ TRANSFER ☐ REPACK ☒ SALE ☐ CO-USE

BILL TO: MARTIN MARINE	CUSTOMER NO.	DATE: 11-7-24
ORDERED BY GREG PEABODY	P.O. NO./AFE:	
PHONE NO. 281-299-9121	LEASE NO.	
AREA/BLOCK PORT ARTHUR	OCSG#	WELL NO. LA FORCE
RIG/VESSEL MARGRET SUE	TIME STARTED	TIME FINISHED
	AM / PM	AM / PM

ITEM CODE	EQUIP/LABOR	DESCRIPTION	HOURS RT / OT
	ROUSTABOUTS		
	CRANE		
	FORKLIFT		
	EQUIPMENT OPERATOR		

PRODUCT CODE	HM	DESCRIPTION	CONTAINER	COUNT	QUANTITY
502820		OILY WATER	DRUM	155	10g
		LA FORCE DROPPED OFF TO MARTIN STANLIND.			
		MV PETER BRAND ICE DELIVERED TO MMMLP 2601.			
		MMMLP 2601 DROPPED THEM OFF AT MES-PA DOCK 17.			

DRUMS DELIVERED		DRUMS RETURNED		BEFORE	AFTER
WATER	METER READINGS: START	STOP	GALS.		
TERMINAL	SUPPLIER	BOL #	METER TKT. #	TRUCK#	TRAILER #
CONTAINER DESCRIPTION	COMPARTMENT 1	COMPARTMENT 2	COMPARTMENT 3	COMPARTMENT 4	COMPARTMENT 5
1 CARGO TANK					

MEDIA OF PAYMENT ☐ CREDIT CARD ☐ CHECK ☐ CASH \$ INITIALS TOTAL REC'D. \$

TERMS & CONDITIONS: This Yard Ticket is issued in accordance with the General Terms & Conditions on <http://www.themartincompanies.com/martin-energy-services-mes-general-terms-and-conditions> and incorporated by reference, unless otherwise agreed to by both parties in writing.

*This is to certify that the above-named materials are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation according to the applicable regulations of the Department of Transportation.

EPA Registered Entity #4954: Martin Energy Services LLC

IN CASE OF EMERGENCY CALL TOLL FREE 24 HRS.
(800) 421-4738

APPROVED BY: **X**
Customer Signature

Martin Energy Services Representative

From: [Carl DiMario](#)
To: [Scott Ranalli](#)
Cc: [Robert Cast](#); [Greg Peabody](#); [MESPortArthur](#)
Subject: Re: La Force Paperwork.pdf
Date: Friday, November 8, 2024 12:42:51 PM
Attachments: [image001.png](#)

See below.

Facility Name	Port Arthur Dock
Facility Address	<u>2400 S. Gulf Way, Port Arthur, TX 77640</u>
EPA I.D. Number	TXD067940957
Used Oil	TXD067940957, A85980

Martin Resource Management Corporation
Waste Program Manager
Senior Environmental Specialist.

Carl DiMario

On Nov 8, 2024, at 11:44, Scott Ranalli <Scott.Ranalli@martinmlp.com> wrote:

Guys

Please send me any Registration/Licensing paperwork for MES Port Arthur.

Thanks,

Scott Ranalli

Sr. Environmental Specialist

Corporate Environmental, Health & Safety

<[image001.png](#)>

Martin Resource Management Corporation

Three Riverway, Suite 400

Houston, Texas 77056

(713) 350-6827 (Ofc)

(409) 504-1489 (Cell)

Mail to: Scott.Ranalli@martinmlp.com

-----Original Message-----

From: Robert Cast <Robert.Cast@martinmlp.com>

Sent: Friday, November 8, 2024 10:05 AM

To: Carl DiMario <Carl.DiMario@martinmlp.com>; Scott Ranalli
<Scott.Ranalli@martinmlp.com>

Cc: Greg Peabody <Greg.Peabody@martinmlp.com>; MESPortArthur
<MESPortArthur@martinmlp.com>

APPENDIX 4. SPENT SULFURIC ACID WASTE DETERMINATION AND EPISODIC EVENT FORM

ATTACHMENT C1
PHOTOS: LABELED HAZARDOUS WASTE TOTES
Martin Operating Stanolind Terminal



Hazardous Waste Sticker Affixed to Tote



Re-Labeled Totes

GENERATOR WASTE PROFILE SHEET

Is this a renewal? ☐ YES or ☒ NO		Waste Profile #	
Is this a one-time waste stream? ☐ YES or ☒ NO			
I. Generator Information		Date Submitted: 11/20/2024	
Generator Name: MARTIN OPERATING PARTNERSHIP LP - BEAUMONT STANOLIND TERMINAL			
Generator Site Address: #10 SULFUR PLANT RD			
City: BEAUMONT	County: JEFFERSON	State: TX	Zip: 77701
State ID/Reg No: SWR 87582	State Approval/Waste Code: 0030-102-H		SIC Code: 5169
Generator Mailing Address (if different):			
City:	County:	State:	Zip:
Generator Contact Name: SCOTT RANALLI, MARTIN RESOURCE MGMT			
Phone Number: 713-350-6827		Fax Number: 713-350-2827	

II. Waste Stream Information

Name of Waste: USED SULFURIC ACID AND WATER	
Process Generating Waste:	
MAINTENANCE ACTIVITIES	
When operators went to perform maintenance and repairs on a valve seal on the Sulfuric Acid Storage Tanks, it was determined that leaking acid and already merged with standing rainwater in that containment. The mixture was pumped into totes for temporary storage, pending neutralization treatment and disposal.	
Type of Waste ☒ INDUSTRIAL PROCESS WASTE or ☐ POLLUTION CONTROL WASTE	
Physical State: ☐ SOLID ☐ SEMI-SOLID ☐ POWDER ☒ LIQUID ☐ OTHER: _____:	

III. Representative Sample Certification

☒ NO SAMPLE TAKEN

Is the representative sample collected to prepare this profile and laboratory analysis, collected in accordance with U.S. EPA 40 CFR 261.20(c) guidelines or equivalent rules? ☐ YES or ☐ NO	
Sample Date:	Type of Sample: ☐ COMPOSITE ☐ GRAB
Laboratory:	Sample ID Numbers:
Sampler's Employer:	
Sampler's Name (printed):	Signature:
Supporting documentation attached: SDS	☒ YES or ☐ NO (for process knowledge please provide data)

IV. DOT Shipment Information

DOT Shipping Name:	Not Applicable
Method of Shipment:	☐ Bulk ☒ Tanker ☐ Drum ☐ Other (Specify):
Frequency of Shipment:	☐ Daily ☐ Monthly ☐ Weekly ☐ One-Time ☒ Other (Specify):
Estimated Annual Volume: ☐ CUBIC YARDS: _____ ☐ TONS: _____ ☐ GALLONS: _____ ☐ OTHER: _____	
Special Handling Instructions:	
ERG Guide#:	
RQ: NA	
LDR Required with Shipment: ☐ YES or ☒ NO	

GENERATOR WASTE PROFILE SHEET (continued)

Waste Profile #

V. Physical Characteristics of Waste

Characteristic Components		% by Weight (range)					
1. WATER		40-70%					
2. SULFURIC ACID		30-60%					
3. SEDIMENT		0-2%					
4.							
5.							
Color Orange	Odor (describe) Mild Sulfur	Free Liquids ☒ YES or ☐ NO Content 100 %	% Solids 0 0-2	pH: <2.0	Flash Point >200 F	% Halogens NA	
Attach Laboratory Analytical Report (and/or Material Safety Data Sheet) Including Required Parameters Provided for this Profile							
Does this waste or generating process contain regulated concentrations of the following Pesticides and/or Herbicides: Chlordane, Endrin, Heptachlor (and its epoxides), Lindane, Methoxychlor, Toxaphene, 2,4-D, or 2,4,5-TP Silvex as defined in 40 CFR 261.33?						☐ Yes or ☒ No	
Does this waste or generating process cause it to exceed OSHA exposure limits from high levels of Hydrogen Sulfide or Hydrogen Cyanide as defined in 40 CFR 261.23?						☐ Yes or ☒ No	
Does this waste contain regulated concentrations of Polychlorinated Biphenyls (PCBs) as defined in 40 CFR Part 761?						☐ Yes or ☒ No	
Does this waste contain regulated concentrations of listed hazardous wastes defined in 40 CFR 261.31, 261.32, 261.33, including RCRA F-Listed Solvents?						☐ Yes or ☒ No	
Does this waste contain regulated concentrations of 2,3,7,8-Tetrachlorodibenzodioxin (2,3,7,8-TCDD), or any other dioxin as defined in 40 CFR 261.31?						☐ Yes or ☒ No	
Is this a regulated Toxic Material as defined by Federal and/or State regulations?						☐ Yes or ☒ No	
Is this a regulated Radioactive Waste as defined by Federal and/or State regulations?						☐ Yes or ☒ No	
Is this a regulated Medical or Infectious Waste as defined by Federal and/or State regulations?						☐ Yes or ☒ No	
Is this waste generated at a Federal Superfund Clean Up Site?						☐ Yes or ☒ No	

VI. Waste Codes

Hazardous Waste ☒ YES or ☐ NO Non Hazardous Waste ☐ YES or ☒ NO Municipal Waste ☐ YES or ☒ NO		
TSCA Waste ☐ YES or ☒ NO		
LIST WASTE CODES BELOW		
0030-102-H		

GENERATOR WASTE PROFILE SHEET (continued)

VII. Transporter & TSDF Information

Transporter Name: NA			
Address:			
City:	County:	State:	Zip:
EPA ID#:			
Transporter Name:			
Address:			
City:	County:	State:	Zip:
EPA ID#:			
Transporter Name:			
Address:			
City:	County:	State:	Zip:
EPA ID#:			
TSDF or Disposal Facility Name #1:			
Address:			
City:	County:	State:	Zip:
EPA ID#:			
39098			
TSDF or Disposal Facility Name #2:			
Address:			
City:	County:	State:	Zip:
EPA ID#:			
TSDF or Disposal Facility Name #3:			
Address:			
City:	County:	State:	Zip:
EPA ID#:			
Form "R" Information: 8.1c: <u>0</u> % 8.1d: <u>0</u> % 8.7 <u>100</u> %			

GENERATOR WASTE PROFILE SHEET (continued)

VIII. EPA Reporting Codes / Waste Reduction & Effort Codes	
EPA Reporting Codes:	
Management Method Code:	H121
Source Code:	G32
Form Code:	W103
Waste Minimization Code:	A

HW Reduction			
This Year Ratio	Goal Year Ratio	Goal Year	Change in Toxicity
Waste Toxicity Reduction Effort Codes			
Reformulation/redesign of product	☐	Training of Technical Assistance	☐
In process recycling/process Modification	☐	Technical Feasibility	☐
Equipment/Technology Modification	☐	Economic Practicality	☐
Substituting Raw Materials	☐	Measurement/Accounting	☐
Improved Operations	☐	State Hazardous Waste Regulations	☐
Reduction/Research Planning	☐	Implementation Previous Efforts	☐
No Effort	☐	High Cost of HW Management	☐
Other Reduce Toxicity of Waste	☒	Accidental Generation	☐
		Other	☐
<i>Explain reported data (If applicable)</i>			
<i>If No numeric goal, explain why:</i>			
CONTINUED INITIATIVES TO RECYCLE OFF-SITE			

GENERATOR WASTE PROFILE SHEET (continued)

IX. Generator Certification

I hereby certify that to the best of my knowledge and belief, the information contained herein is a true, complete, and accurate description of the waste material being offered for disposal and all known or suspected hazards have been disclosed. All Analytical Results/Material Safety Data Sheets submitted are truthful and complete and are representative of the waste. I further certify that by utilizing this profile, neither I nor any other employee of the company will deliver for disposal or attempt to deliver for disposal any waste which is classified as toxic waste, hazardous waste or infectious waste, or any other waste material this facility is prohibited from accepting by law. I shall immediately give written notice of any change or condition pertaining to the waste not provided herein. I agree that if there is a discrepancy between the waste received and any information supplied on this form, that either Martin Operating Partnership or the generator may initiate further testing and evaluation in accordance with the terms and conditions of the contract between Martin Operating Partnership and the generator; that this profile certification may be amended accordingly; and that additional expenses incurred by Martin Operating Partnership in order to manage the waste in accordance with Federal, State, and Local regulatory requirements will be the sole responsibility of the generator, including return of the material to the generator at generator's expense.

SCOTT RANALLI, SR. ENVIRONMENTAL SPECIALIST

MARTIN RESOURCE MANAGEMENT

Authorized Representative Name And Title (Printed)

Company Name

Scott Ranalli

Digitally signed by Scott Ranalli
DN: cn=Scott Ranalli, o, ou=Martin Corporate EH&S,
email=scott.ranalli@martinmlp.com, c=US
Date: 2014.07.25 15:24:20 -05'00'

11/20/2024

Authorized Representative Signature

Date

X. Martin Waste Decision

☐ Approved

☐ Rejected

Expiration: _____

Conditions:

Name, Title

Signature

Date



SAFETY DATA SHEET

SECTION 1) CHEMICAL PRODUCT AND SUPPLIER'S IDENTIFICATION

Product ID: Sulfuric acid
Product Name: Sulfuric acid
Revision Date: Aug 17, 2015
Version: 1.0
Manufacturer's Name: Martin Operating Partnership, L.P.
Address: P.O. Box 191, Kilgore, TX, US, 75663
Emergency Phone: CHEMTREC (800) 424-9300
Information Phone: 800-231-4595
Fax:
Product/Recommended Uses Industrial uses

Date Printed: Aug 21, 2015
Supersedes Date:

SECTION 2) HAZARDS IDENTIFICATION

Classification:

Corrosive to metals category 1
Specific Target Organ Toxicity - Single Exposure - Category 1
Skin Corrosion - Category 1A
Serious Eye Damage - Category 1
Acute aquatic toxicity - Category 3
Chronic aquatic toxicity - Category 3
Acute toxicity, Inhalation - Category 4
Acute toxicity, Oral - Category 5

Pictograms:



Signal Word:

Danger

Hazardous Statements - Physical:

May be corrosive to metals

Hazardous Statements - Health:

Causes damage to organs.
Causes severe skin burns and eye damage
Causes serious eye damage
May be harmful if swallowed
Harmful if inhaled

Hazardous Statements - Environmental:

Harmful to aquatic life
Harmful to aquatic life with long lasting effects

Precautionary Statements - General:

- If medical advice is needed, have product container or label at hand.
- Keep out of reach of children.
- Read label before use.

Precautionary Statements - Prevention:

- Do not breathe dust/fume/gas/mist/vapors/spray.
- Wash with soap and water thoroughly after handling.
- Do not eat, drink or smoke when using this product.
- Wear protective gloves/protective clothing/eye protection/face protection.
- Avoid release to the environment.
- Keep only in original packaging.
- Avoid breathing dust/fume/gas/mist/vapors/spray.
- Use only outdoors or in a well-ventilated area.

Precautionary Statements - Response:

- IF exposed or concerned: Call a POISON CENTER/doctor.
- Specific treatment (see First-aid measures on this label).
- IF SWALLOWED: Rinse mouth. Do NOT induce vomiting.
- IF ON SKIN (or hair): Take off immediately all contaminated clothing. Rinse skin with water <or shower>.
- Wash contaminated clothing before reuse.
- IF INHALED: Remove person to fresh air and keep comfortable for breathing.
- Immediately call a POISON CENTER or doctor.
- IF IN EYES: Rinse cautiously with water for several minutes. Remove contact lenses, if present and easy to do. Continue rinsing.
- Absorb spillage to prevent material damage.
- Call a POISON CENTER/doctor if you feel unwell.

Precautionary Statements - Storage:

- Store locked up.
- Store in a corrosive resistant container with a resistant inner liner.

Precautionary Statements - Disposal:

Dispose of contents/container to disposal recycling center. Under RCRA it is the responsibility of the user of the product to determine at the time of disposal whether the product meets RCRA criteria for hazardous waste. Waste management should be in full compliance with federal, state and local laws.

SECTION 3) COMPOSITION / INFORMATION ON INGREDIENTS

CAS	Chemical Name	% By Weight
0007664-93-9	SULFURIC ACID	72% - 98%
0007732-18-5	WATER	8% - 18%

SECTION 4) FIRST-AID MEASURES

- Inhalation:**
- Remove source of exposure or move person to fresh air and keep comfortable for breathing. Immediately call a POISON CENTER/doctor.
 - If breathing has stopped, trained personnel should begin rescue breathing or, if the heart has stopped, immediately start cardiopulmonary resuscitation (CPR) or automated external defibrillator.
 - If breathing is difficult, trained personnel should administer emergency oxygen. DO NOT allow victim to move about unnecessarily.
 - Symptoms of pulmonary edema may be delayed.
 - Take precautions to ensure your own safety before attempting rescue (e.g. wear appropriate protective equipment, use the buddy system).

- Skin Contact:**
- Take off immediately all contaminated clothing, shoes, and leather goods (e.g., watchbands, belts). Rinse skin with plenty of lukewarm, gently flowing water for a duration of 30-60 minutes or until medical aid is available. DO NOT INTERRUPT FLUSHING. If it can be done safely, continue flushing during transport to hospital. Immediately call a POISON CENTER/doctor. Double bag, seal and label contaminated clothing for safe disposal.

Eye Contact:

Avoid direct contact. Wear chemical protective gloves if necessary. Immediately rinse eyes cautiously with lukewarm, gently flowing water for several minutes, while holding the eyelids open. If a contact lens is present, DO NOT delay flushing or attempt to remove the lens. Neutral saline solution may be used as soon as it is available. DO NOT INTERRUPT FLUSHING. Continue rinsing for 30 - 60 minutes or until medical aid is available. Take care not to rinse contaminated water into the unaffected eye or onto the face. Immediately call a POISON CENTER or doctor. If necessary, continue flushing during transport to hospital.

Ingestion:

Immediately call a POISON CENTER/doctor. Rinse mouth. Do NOT induce vomiting. If vomiting occurs naturally, lie on your side, in the recovery position.

SECTION 5) FIRE-FIGHTING MEASURES

Suitable Extinguishing Media:

Dry chemical, carbon dioxide or foam is recommended. Carbon dioxide can displace oxygen. Use caution when applying carbon dioxide in confined spaces.

Unsuitable Extinguishing Media:

Do not use water or water-based extinguishing agents. ONLY use water to keep non-leaking, fire-exposed containers cool.

Specific Hazards in Case of Fire:

Releases sulfur dioxide at extremely high temperatures. Sulfuric acid vapors, mists and sulfur trioxide may be released.

Fire-fighting Procedures:

Isolate immediate hazard area and keep unauthorized personnel out. Stop spill/release if it can be done safely. Stay upwind and avoid smoke and fumes. Move undamaged containers from immediate hazard area if it can be done safely. Water spray may be useful in minimizing or dispersing vapors and to protect personnel.

Neutralize runoff with lime, soda ash or other suitable neutralizing agents.

Dispose of fire debris and contaminated extinguishing water in accordance with official regulations.

Special Fire-fighting Procedures:

Water may be ineffective but can be used to cool containers exposed to heat or flame. Caution should be exercised when using water or foam as frothing may occur, especially if sprayed into containers of hot, burning liquid.

Special Protective Actions:

Wear protective pressure self-contained breathing apparatus (SCBA) and full turnout gear.

For fighting fire in close proximity to spill or vapors, use acid-resistant personal protective equipment.

Specific hazards arising from chemical:

Contact with water causes violent frothing and spattering. Reacts with metals to produce highly flammable hydrogen gas. Hydrogen can accumulate to explosive concentrations. May ignite other combustible materials. Closed containers may rupture violently when heated releasing contents. In a fire, the following hazardous materials may be generated: corrosive sulfur oxides.

SECTION 6) ACCIDENTAL RELEASE MEASURES

Emergency Procedure:

Keep unnecessary people away; isolate hazard area and deny entry. Do not touch or walk through spilled material. Stay upwind; keep out of low areas.

Immediately stop leak if possible without risk. Cover with DRY earth, sand or other non-combustible material or absorb with inert DRY material. Place in appropriate waste disposal container and dispose of waste material at an approved waste treatment/disposal facility, in accordance with applicable regulations. Do not dispose waste in normal garbage or sewer systems. Ensure adequate decontamination of tools and equipment following clean up.

If necessary, Consider neutralizing the residue with sodium carbonate, lime or other suitable neutralizing agent.

Recommended equipment:

Positive pressure, full-facepiece self-contained breathing apparatus (SCBA), or positive pressure supplied air respirator with escape SCBA (NIOSH approved).

In case of emergency or where there is a strong possibility of considerable exposure, wear a complete acid suit with hood, boots and gloves.

Personal Precautions:

Avoid breathing vapor. Avoid contact with skin, eye or clothing. ELIMINATE all ignition sources (no smoking, flares, sparks or flames in immediate area). Use explosive proof equipment. Avoid inhalation of dust and contact with skin and eyes. Do not touch damaged containers or spilled materials unless wearing appropriate protective clothing.

Environmental Precautions:

SECTION 7) HANDLING AND STORAGE

General:

Wash hands after use.
Do not get in eyes, on skin or on clothing.
Do not breathe vapors or mists.
Use good personal hygiene practices.
Eating, drinking and smoking in work areas is prohibited.
Remove contaminated clothing and protective equipment before entering eating areas.
Eyewash stations and showers should be available in areas where this material is used and stored.
Good general ventilation should be provided to keep vapor and mist concentrations below the exposure limits. Strong inorganic acid mists containing sulfuric acid can be carcinogenic.

Ventilation Requirements:

Use only with adequate ventilation to control air contaminants to their exposure limits. The use of local ventilation is recommended to control emissions near the source. Provide mechanical ventilation for confined spaces. Use explosion-proof ventilation equipment.
Strong inorganic mists containing sulfuric acid can be carcinogenic.

Storage Room Requirements:

Keep container(s) tightly closed and properly labeled. Store in cool, dry, well-ventilated areas away from heat, direct sunlight, strong oxidizers and any incompatibilities. Store in approved containers and protect against physical damage. Keep containers securely sealed when not in use. Indoor storage should meet OSHA standards and appropriate fire codes. Containers that have been opened must be carefully resealed to prevent leakage. Empty containers retain residue and may be dangerous.
CAUTION: Hydrogen a flammable gas, can accumulate to explosive concentrations inside drums, or any types of steel containers or tanks upon storage. Metal and, specifically carbon steel, storage tanks must be vented due to hydrogen release.
Use EXTREME care when diluting with water. Always add acid to water never the reverse. People working with this chemical should be properly trained regarding its hazards and its safe use.
Keep ignition sources away from sulfuric acid storage, handling and transportation equipment.

SECTION 8) EXPOSURE CONTROLS/PERSONAL PROTECTION

Eye protection:

Wear eye protection with side shields or goggles. Wear indirect-vent, impact and splash resistant goggles when working with liquids. If additional protection is needed for entire face, use in combination with a face shield.

Skin protection:

Use of gloves approved to relevant standards made from the following materials may provide suitable chemical protection: PVC, neoprene or nitrile rubber gloves. Suitability and durability of a glove is dependent on usage, e.g. frequency and duration of contact, chemical resistance of glove material, glove thickness, dexterity. Always seek advice from glove suppliers. Contaminated gloves should be replaced. Use of an apron and over-boots of chemically impervious materials such as neoprene or nitrile rubber is recommended to avoid skin sensitization. The type of protective equipment must be selected according to the concentration and amount of the dangerous substance at the specific workplace.
Where there is a danger of spilling or splashing, acid resistant aprons or suits should be worn. Trouser legs should be worn outside (not tucked in) rubber boots.
Launder soiled clothes or properly disposed of contaminated material, which cannot be decontaminated.

Respiratory protection:

If engineering controls do not maintain airborne concentrations to a level which is adequate to protect worker, a respiratory protection program that meets or is equivalent to OSHA 29 CFR 1910.134 and ANSI Z88.2 should be followed. Check with respiratory protective equipment suppliers. If the respirator is the sole means of protection, use a full-face supplied air respirator.

Use a NIOSH/MSHA approved air-purifying respirator equipped with acid gas/fume, dust, mist cartridges for concentrations up to 10 mg/m³.

Appropriate Engineering Controls:

Provide exhaust ventilation or other engineering controls to keep the airborne concentrations of vapors below their respective threshold limit value. Ensure that eyewash stations and safety showers are proximal to the work-station location.
The most effective measures are the total enclosure of processes and the mechanization of handling procedure to prevent all personal contact with sulfuric acid.

Chemical Name	OSHA TWA (ppm)	OSHA TWA (mg/m ³)	OSHA STEL (ppm)	OSHA STEL (mg/m ³)	OSHA Tables (Z1, Z2, Z3)	OSHA Carcinogen	OSHA Skin designation	NIOSH TWA (ppm)	NIOSH TWA (mg/m ³)	NIOSH STEL (ppm)	NIOSH STEL (mg/m ³)	NIOSH Carcinogen
SULFURIC ACID		1			1				1			

Chemical Name	ACGIH TWA (ppm)	ACGIH TWA (mg/m3)	ACGIH STEL (ppm)	ACGIH STEL (mg/m3)	ACGIH Carcinogen	ACGIH Notations	ACGIH TLV Basis
SULFURIC ACID		0.2 (T)			A2	A2 (M)	Pulm func

SECTION 9) PHYSICAL AND CHEMICAL PROPERTIES

Physical and Chemical Properties

Density	15.387 lb/gal
Density VOC	0.000 lb/gal
% VOC	0.000%
VOC Actual	0.000 lb/gal
VOC Actual	0.000 g/l
Specific Gravity	1.844
VOC Regulatory	0.000 lb/gal
VOC Regulatory	0.000 g/l

Appearance	Clear to amber, heavy, oily liquid.
Odor Threshold	N.A.
Odor Description	N.A.
pH	0.3 (1N solution at 78°F)
Water Solubility	Easy soluble in cold water (with liberation of much heat).
Flammability	Will not burn
Flash Point Symbol	N.A.
Flash Point	N.A.
Viscosity	N.A.
Lower Explosion Level	N.A.
Upper Explosion Level	N.A.
Vapor Pressure	0.002 mmHg
Vapor Density	3.4
Freezing Point	30 °F
Melting Point	30 °F
Low Boiling Point	626 °F
High Boiling Point	N.A.
Auto Ignition Temp	N.A.
Decomposition Pt	N.A.
Evaporation Rate	N.A.
Coefficient Water/Oil	N.A.

SECTION 10) STABILITY AND REACTIVITY

Stability:

Stable, but reacts violently with water and organic materials with evolution of heat.

Conditions to Avoid:

Avoid heat, sparks, flame, contact with incompatible materials, water, moisture and humidity.

Hazardous Polymerization:

Will not occur.

Incompatible Materials:

Highly reactive. Reacts violently with cyclopentadiene, cyclopentanone oxime, nitroaryl amines, hexalithium disilicide, phosphorous(III) oxide, powdered metals. Vigorous reactions with water, alkaline solutions, carbides, fulminates, nitrates, picrates, cyanides, chlorates, alkali halides, Zinc salts, permanganates, e.g. potassium permanganate, Hydrogen peroxide, Azides, Perchlorates., Nitromethane, phosphorous, strong oxidizing, reducing or combustible organic materials. Hazardous gases are evolved in contact with chemicals such as cyanides, sulfides and carbides.

Hazardous Decomposition Products:

Releases sulfur dioxide at extremely high temperatures.

SECTION 11) TOXICOLOGICAL INFORMATION

Skin Corrosion/Irritation:

Concentrated solutions may cause second or third degree burns with severe necrosis. Prolonged and repeated exposure to dilute solutions may cause irritation, redness, pain, drying and cracking of skin.

Causes severe skin burns and eye damage

Serious Eye Damage/Irritation:

Immediate pain, severe burns and corneal damage, which may result in permanent blindness.

Causes serious eye damage

Respiratory/Skin Sensitization:

No Data Available

Germ Cell Mutagenicity:

No Data Available

Carcinogenicity:

Strong inorganic acid mists containing sulfuric acid is carcinogenic to man, causing cancer of the larynx.

Reproductive Toxicity:

Slightly embryotoxic in rabbits (a minor, rare skeletal variation).

Specific Target Organ Toxicity - Single Exposure:

Causes damage to organs.

Specific Target Organ Toxicity - Repeated Exposure:

No Data Available

Aspiration Hazard:

No Data Available

Acute Toxicity:

Harmful if inhaled.

May be harmful if swallowed.

If inhaled, can cause respiratory irritation and chemical burns to respiratory tract. At high concentrations may cause severe injury, burns, or death. Can cause life-threatening accumulation of fluid in the lungs (pulmonary edema). Inhalation may be fatal as a result of spasm, inflammation, edema of the larynx and bronchi, chemical pneumonitis, and pulmonary edema. May also affect teeth (changes in teeth and supporting structures - erosion, discoloration).

Breathing of vapors or sprays (mists) may aggravate acute or chronic asthma and chronic pulmonary disease such as emphysema and bronchitis.

If ingested, May cause permanent damage to the digestive tract. Causes gastrointestinal tract burns. May cause perforation of the stomach, GI bleeding, edema of the glottis, necrosis and scarring, and sudden circulatory collapse. It may also cause systemic toxicity with acidosis.

0007664-93-9 SULFURIC ACID

LC50 (rat): 510 mg/m3 (2 hour-exposure) (255 mg/m3 - equivalent 4-hour exposure) (1)

LC50 (mouse): 320 mg/m3 (2-hour exposure) (160 mg/m3 - equivalent 4-hour exposure) (1)

LD50 (oral, rat): 2140 mg/kg (2)

SECTION 12) ECOLOGICAL INFORMATION

Toxicity:

Harmful to aquatic life with long lasting effects

Persistence and Degradability:

No Data Available.

Bio-accumulative Potential:

No data available.

Mobility in Soil:

No Data Available.

Other Adverse Effects:

No Data Available.

SECTION 13) DISPOSAL CONSIDERATIONS

Waste Disposal:

Under RCRA it is the responsibility of the user of the product to determine at the time of disposal whether the product meets RCRA criteria for hazardous waste. Waste management should be in full compliance with federal, state and local laws.

Empty Containers retain product residue which may exhibit hazards of material, therefore do not pressurize, cut, glaze, weld or use for any other purposes. Return drums to reclamation centers for proper cleaning and reuse.

SECTION 14) TRANSPORT INFORMATION

For Domestic Shipments - Bulk Packaging:

Packaging References should be 49CFR, Sections 172.101, 173.154, 173.202, and 173.242

Note: Hazardous Substance - 1000 lbs/454 kg RQ

For International Shipments:

U.S. DOT - ID# UN 1830 - Proper Shipping Name is Sulfuric Acid - Hazard Class is 8 - Packaging Group is II

IMDG - ID# UN 1830 - Proper Shipping Name is SULPHURIC ACID - Hazard Class is 8 - Packaging Group is II

IATA - ID# UN 1830 - Proper Shipping Name is SULPHURIC ACID - Hazard Class is 8 - Packaging Group is II

Packaging References - 855, 851, Y840

Note: Hazardous Substance - 1000 lbs/454 kg RQ

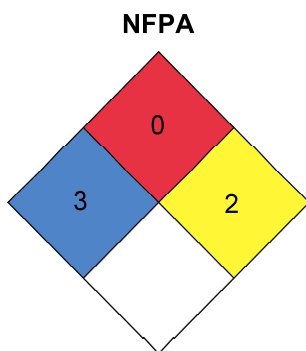
SECTION 15) REGULATORY INFORMATION

CAS	Chemical Name	% By Weight	Regulation List
0007664-93-9	SULFURIC ACID	72% - 98%	DSL, CERCLA, SARA 312, SARA 313, IARC Carcinogen, TSCA, TX_ESL, CA_Prop65 - California Proposition 65, CA_Prop65_Type_Toxicity_Cancer - CA_Proposition65_Type_Toxicity_Cancer, OSHA
0007732-18-5	WATER	8% - 18%	DSL, TSCA

SECTION 16) OTHER INFORMATION INCLUDING INFORMATION ON PREPARATION AND REVISION OF THE SDS

Glossary:

ACGIH- American Conference of Governmental Industrial Hygienists; ANSI- American National Standards Institute; Canadian TDG- Canadian Transportation of Dangerous Goods; CAS- Chemical Abstract Service; Chemtrec- Chemical Transportation Emergency Center (US); CHIP- Chemical Hazard Information and Packaging; DSL- Domestic Substances List; EC- Equivalent Concentration; EH40 (UK)- HSE Guidance Note EH40 Occupational Exposure Limits; EPCRA- Emergency Planning and Community Right-To-Know Act; ESL- Effects screening levels; HMIS- Hazardous Material Information Service; LC- Lethal Concentration; LD- Lethal Dose; NFPA- National Fire Protection Association; OEL- Occupational Exposure Limits; OSHA- Occupational Safety and Health Administration, US Department of Labor; PEL- Permissible Exposure Limit; SARA (Title III)- Superfund Amendments and Reauthorization Act; SARA 313- Superfund Amendments and Reauthorization Act, Section 313; SCBA- Self-Contained Breathing Apparatus; STEL- Short Term Exposure Limit; TCEQ - Texas Commission on Environmental Quality; TLV- Threshold Limit Value; TSCA- Toxic Substances Control Act Public Law 94-469; TWA - Time Weighted Value; US DOT- US Department of Transportation; WHMIS- Workplace Hazardous Materials Information System.



DISCLAIMER

Information provided in this Safety Data Sheet is considered accurate and reliable based on information issued from internal and outside sources to the best of Martin Operating Partnership L.P.'s knowledge; however, Martin Operating Partnership L.P. makes no representations, guarantees or warranties, expressed or implied, of merchantability or fitness for the particular purpose, regarding the accuracy of such information or the result to be obtained from the use thereof or as to the sufficiency of information herein presented. Martin Operating Partnership L.P. assumes no responsibility for injury to recipient or to third persons or for any damage to any property and recipient assumes all such risks.

This product may be formulated in part with components purchased from other companies. In many instances, especially when proprietary or trade secret materials are used, Martin Resources, a division of Martin Operating Partnership L.P., must rely upon information provided by the material manufacturers or distributors.

View Waste Code with Submitted Changes: 0030102H

Facility SWR #: 87582

Today's date is: 11/21/2024

14:46



Please print this page.

This page confirms your submittal to the TCEQ.

Your confirmation number is 317618.

The data hash code is

0E7D18036FDFD2A77F592BD95D9C840676BCD3E8253C51174A01EB028594A655.

You will also receive a confirmation e-mail.

Texas Waste Code: 0030102H

Company Waste Description: SPENT SULFURIC ACID

Origin Code: 2 - The waste resulted from a spill clean-up, equipment decommissioning, or emergency removal by company

New Chemical Substance: N

Management Location: On site only

Management Units: 008 008

*Recent changes to your cross references will be reflected here. To view your copy of record, please search the [submit log](#).

Status: Active

Recycled: N

Description: Operators performing maintenance/repair on a leaking valve found that Sulfuric Acid had leaked into standing rainwater in the containment. The liquids were pumped into totes, pending on-site neutralization treatment

For Hazardous Wastes Only:

NAICS Code: 424710 - Petroleum Bulk Stations and Terminals

Source Code: G32 - Cleanup of spill residues (infrequent, not routine)

EPA Form Code: W103 - Spent concentrated acid

System Type Codes:

Mixed with Radioactive Waste: N

EPA Codes: D002 P115

This record has been submitted to the TCEQ. No additional changes can be made to this waste code information until these changes appear in the official TCEQ data on this web site.

List Wastes



Episodic Notification for Registered Generators

Bold items required for all notifications. Print clearly or type.

This form is for:

- VSQGs or Class 1 Industrial waste generators with active solid waste registrations that have generated or will generate more than 100 kilograms (kg) of non-acute hazardous waste or 1 kg of acute hazardous waste in a calendar month.
- SQGs with active solid waste registrations that have generated or will generate more than 1000 kg of non-acute hazardous waste or 1 kg of acute hazardous waste in a calendar month.

Registered generators should not notify of Class 1 Industrial waste generation on this form.

You must report waste generated during this episodic event on the site's annual waste summary.

Solid Waste Registration #: 87582 **Start Date:** 11/05/2024 **End Date:** 12/29/2024

EPA ID: TXR000060909

Site Name: MARTIN OPERATING - STANOLIND TERMINAL

Event Type (check one):

Planned:

- ☐ Equipment maintenance during plant shutdowns
- ☐ Excess chemical inventory removal

- ☐ Short-term construction or demolition
- ☐ Tank cleanouts
- ☐ Other planned: _____

Unplanned:

- ☒ Accidental spills
- ☐ "Acts of nature" (Tornado, hurricane, flood, etc.)
- ☐ Fire

- ☐ Product recalls
- ☐ Production process upsets
- ☐ Other unplanned: _____

Texas Waste Codes and Estimated Quantities (in pounds)

Add any unregistered Texas Waste Codes to the registration prior to submitting this form.

Texas Waste Code	Estimated Quantity
0030102H	22,000 lbs

Texas Waste Code	Estimated Quantity

TCEQ use only: IHW REG/ 87582 /CO/ _____/UPDATE

Solid Waste Registration #: 87582

Site Name: MARTIN OPERATING - STANOLIND TERMINAL

Certification (Must be included with all submissions)

Contact the ☐ Preparer ☐ Authorized Signer with any questions regarding this submission.

Preparer Information:

Name: SCOTT RANALLI

Title: SR. ENVIRONMENTAL SPECIALIST

Company: MARTIN RESOURCE MGMT (for MARTIN OPERATING PARTNERSHIP)

Telephone: (409) 504-1489 **Fax:** (713) 350-2827

Email: scott.ranalli@MartinMLP.com

Authorized Signer:

By my signature below, I certify, to the best of my knowledge, that the information provided in this form is complete and accurate. I understand that the registration on listed on this form will be updated with the information provided herein. I also certify that I have signature authority to submit this form on behalf of the entity listed as the "Site Name".

☒ Same as preparer information above (go to Signature)

Name: SCOTT RANALLI

Title: SR. ENVIRONMENTAL SPECIALIST

Company: MARTIN RESOURCE MGMT (on behalf of Martin Operating Ptnrshp)

Telephone: 409-504-1489

Fax: _____

Email: scott.ranalli@MartinMLP.com

Signature: Scott Ranalli

Mail completed form to:

Texas Commission on Environmental Quality
Registration and Reporting Section MC-129
PO Box 13087
Austin, TX 78711-3087

Use the following address for any submissions sent via overnight services:

Texas Commission on Environmental Quality
Registration and Reporting Section MC-129
12100 Park 35 Circle Bldg D
Austin, TX 78753

Fax: (512) 239-6410

For any questions about filling out this form or for information about the Industrial and Hazardous Waste Program, contact us at (512) 239-6413 or wasteval@tceq.texas.gov.

Individuals are entitled to request and review their personal information that the agency gathers on its forms. They may also have any errors in their information corrected. To review such information, contact TCEQ at 512-239-3282.

From: [Microsoft Outlook](#)
To: Wasteval@tceq.texas.gov
Subject: Relayed: MARTIN OPERATING - STANOLIND: Unplanned Haz Waste
Date: Thursday, November 21, 2024 8:55:30 AM
Attachments: [MARTIN OPERATING - STANOLIND Unplanned Haz Waste.msg](#)

Delivery to these recipients or groups is complete, but no delivery notification was sent by the destination server:
Wasteval@tceq.texas.gov (Wasteval@tceq.texas.gov) <mailto:Wasteval@tceq.texas.gov>
Subject: MARTIN OPERATING - STANOLIND: Unplanned Haz Waste

APPENDIX 5.NEUTRALIZED SULFURIC ACID PROFILE

Special Waste Profile

Disposal Facility: Waste Profile #: Sales Rep #:

I. Generator Information

Generator Name: Generator Site Address: City: County: State: Zip: State ID/Reg No: State Approval/Waste Code: NAICS: Generator Mailing Address: City: County: State: Zip: Generator Contact Name: Email: Phone Number: Ext: Fax Number:

II. Billing Information

Bill To: Contact Name: Billing Address: Email: City: State: Zip: Phone:

III. Waste Stream Information

Name of Waste: Process Generating Waste: Type of Waste: Physical State: Method of Shipment: Estimated Volume: Volume Type: Frequency: Disposal Consideration:

IV. Representative Sample Certification

☐ No Sample Taken ☒ Sample Taken Type of Sample: Is the representative sample collected to prepare this profile and laboratory analysis, collected in accordance with U.S. EPA 40 CFR 261.20(c) guidelines or equivalent? ☒ Yes ☐ NoSample Date: Sample ID Numbers or SDS:

Remember to attach Laboratory Analytical Report (and/or Material Safety Data Sheet) including Chain of Custody and required parameters provided for this profile.

Special Waste Profile



V. Physical Characteristics of Waste

Characteristic Components (must equal 100%):	% By Weight (out of 100% - ranges acceptable):
1. PG asphalt binder (Martin Asphalt Company)	low: 25% - high: 40%
2. Soil	low: 25% - high: 40%
3. Sulfuric acid (Martin Operating Partnership)	low: 5% - high: 25%
4. Lime, hydrated (Cheney Lime & Cement Company)	low: 5% - high: 25%
5. Sulfuric Acid Piping	low: 0% - high: 40%

V. Physical Characteristics of Waste cont.

Color:

Odor (describe): Does Waste Contain Free Liquids? ☐ Yes ☒ No % Solids: pH: Flash Point: °F

Attach Laboratory Analytical Report (and/or Material Safety Data Sheet) including Chain of Custody and required parameters provided for this profile.

RCRA Regulatory Questions

- Does this waste or generating process contain regulated concentrations of the following Pesticides and/ or Herbicides: Chlordane, Endrin, Heptachlor (and its epoxides), Lindane, Methoxychlor, Toxaphene, 2,4-D, or 2,4,5-TP Silvex as defined in 40 CFR 261.33? ☐ Yes ☒ No
- Does this waste contain reactive sulfides (greater than 500 ppm) or reactive cyanide (greater than 250 [reference 40 CFR 261.23(a)(5)])? ☐ Yes ☒ No
- Does this waste contain regulated concentrations of Polychlorinated Biphenyls (PCBs) as defined in 40 CFR Part 761? ☐ Yes ☒ No
- Does this waste contain concentrations of listed hazardous wastes defined in 40 CFR 261.31, 261.32, 261.33, including RCRA F-Listed Solvents? ☐ Yes ☒ No
- Has this waste been delisted under 40 CFR 260.20 and 260.22? If yes, attach the final decision to delist the waste as published in the Federal Register. ☐ Yes ☒ No
- Does this waste exhibit a Hazardous Characteristic as defined by Federal and/or State regulations? ☐ Yes ☒ No
- Does this waste contain regulated concentrations of 2,3,7,8-Tetrachlorodibenzodioxin (2,3,7,8-TCDD), or any other dioxin as defined in 40 CFR 261.31? ☐ Yes ☒ No
- Is this a regulated Medical or Infectious Waste as defined by Federal and/or State regulations? ☐ Yes ☒ No
- Is this a regulated Radioactive Waste as defined by Federal and/or State regulations? ☐ Yes ☒ No
- Is this a solid waste that is not a hazardous waste in accordance with 40 CFR 261.4(b)? If yes, please provide the corresponding regulatory citation. ☐ Yes ☒ No

Republic Services Waste Handling Questions

- Does this waste generate heat or react when contacted with water/moisture? ☐ Yes ☒ No
- Does the waste contain sulfur or sulfur by-products? ☒ Yes ☐ No
- Is this waste generated at a State or Federal Superfund cleanup site subject to regulation under CERCLA? ☐ Yes ☒ No
- Is this waste from a TSD facility, TSD-like facility or consolidator (i.e. multiple wastes/multiple generators)? . If yes, please provide clarification. ☐ Yes ☒ No

Special Waste Profile



VI. Certification

I hereby certify that I have knowledge about the waste material being offered for disposal ("Waste") and have the requisite authority to bind the Generator to the information contained in this Special Waste Profile ("Profile"). I further certify that to the best of my knowledge and belief, the information contained herein is a true, complete and accurate description of the Waste and all known or suspected hazards have been disclosed. All Analytical Results/ Safety Data Sheets submitted are truthful and complete and are representative of the Waste.

I further certify that by utilizing this Profile, neither myself nor any other employee or representative of the company identified below ("Company") will deliver for disposal or attempt to deliver for disposal any Waste that: (i) is classified as toxic waste, hazardous waste or infectious waste; (ii) that does not conform to this Profile; or (iii) that this Disposal Facility is prohibiting from accepting by law. I shall immediately give written notice of any change or condition pertaining to the Waste not provided herein. Our Company hereby agrees to fully indemnify this Disposal Facility against any damages resulting from this Profile or Certification being inaccurate or untrue.

I understand that by attaching an electronic signature, I am signing this document and Company consents to complete this transaction and receive all related communications electronically, and agrees this document will be binding as though it had been physically signed. A printout of this Profile may be accepted with the same authority as the original.

Scott Ranalli

Sr. Environmental Specialist

Martin Operating Partnership LLP

Authorized Representative Name
(Printed)

Title
(Printed)

Company Name

Scott Ranalli

12/29/2023

Authorized Representative Signature

Date



EAS

4825 Ward Drive, Beaumont, TX 77705 (p) 409-842-0658 (f) 409-842-9793

22 December 2023

EAS NO.: 3L15038

Scott Ranalli
Martin Operating Partnerships
P.O. Box 6567
Beaumont, Texas 77725
RE: Waste Characterization

Project No.: Neutralized Waste

Enclosed are the results of analyses for samples received by the laboratory on 12/15/23 14:53. If you have any questions concerning this report, please feel free to contact me.

Reviewed and Approved:

Scott Boudreaux
Project Manager

Earth Analytical Sciences, Inc. (EAS) warrants that work will be performed in accordance with sound laboratory practice and professional standards, but makes no other warranty, expressed or implied. In the event of any error, omission or other professional negligence, the sole and exclusive responsibility of EAS shall be to re-perform the work at its own expense, and EAS shall have no other liability whatsoever. In no event shall EAS be liable, whether in contract or tort, including negligence, for any incidental or consequential damages. If this provision is in conflict with other contractual terms, it is understood that this provision will, in all cases, prevail. This report can only be reproduced in full with written approval and consent of Earth Analytical Sciences, Inc.



EAS is a NELAP accredited laboratory and meets the guidance requirements put forth by "The NELAC Institute" (2016) for NELAP accredited parameters at EAS, unless noted otherwise. NELAP analyte certifications are considered to be approved in Texas and Louisiana for all analytes, unless denoted with an (E-1) under "Certification". Those analytes certified in either Texas or Louisiana, but not both, will be noted by "Case Narrative".

4825 Ward Drive
Beaumont, TX 77705

Tel: (409) 842-0658
Fax: (409) 842-9793
www.earthanalytical.com



4825 Ward Drive
Beaumont, TX 77705
(p) 409-842-0658
(f) 409-842-9793

Martin Operating Partnerships
P.O. Box 6567
Beaumont Texas, 77725

Project: Waste Characterization
Project Number: Neutralized Waste
Project Manager: Scott Ranalli

Reported:
12/22/23 12:25

ANALYTICAL REPORT FOR SAMPLES

Sample ID	Laboratory ID	Matrix	Cooler Temp C	Date Sampled	Date Received
Neutralized Waste	3L15038-01	Solid	4.2	12/15/23 11:30	12/15/23 14:53

Sample Receipt Checklist

COC complete w/ required dates, times, signatures?	No
Chain of Custody Seal on Shipping Container?	No
If yes, is seal intact?	No
COC Seals on containers?	No
If yes, is seal intact?	No
Samples received with evidence of chilling?	No
Was a temperature blank used?	No
Samples received were not frozen & acceptable?	No
Are samples received on ice?	No
Therm. ID#200787226. Bias temp. (if appl.) on chain	No
Cooler temperature was acceptable and recorded?	No
Proof of chilling, sampled same day & acceptable?	No
Are sample containers intact (not damaged)?	No
Are acceptable containers used?	No
Were EnCore-Type samplers used, where applicable?	No
Is volume of samples sufficient for all analyses?	No
Are required preservatives documented acceptable?	No
Preserved samples checked for pH and acceptable?	No
Are samples that require adjusted pH documented?	No
VOAs requiring zero headspace have none or <6mm?	No
Are samples received within holding times?	No
Containers properly labeled and COC match labels?	No



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P.O. Box 6567
Beaumont Texas, 77725

Project: Waste Characterization
Project Number: Neutralized Waste
Project Manager: Scott Ranalli

Reported:
12/22/23 12:25

Case Narrative

Analysis was performed by Summit. A certificate of analysis is enclosed.



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Beaumont, TX 77705
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Martin Operating Partnerships
P.O. Box 6567
Beaumont Texas, 77725

Project: Waste Characterization
Project Number: Neutralized Waste
Project Manager: Scott Ranalli

Reported:
12/22/23 12:25

Neutralized Waste

Work Order #: 3L15038-01

Collection Date & Time : 12/15/2023 11:30:00AM

Analyte	Result	Reporting Limit	MDL	Units	Prepared	Analyzed	Method	Cert	Analyst	Notes
Waste Characterization Analysis Parameters										
Ignitability	> 200	70		°F	12/19/23 08:50	12/19/23 08:50	EPA 1010A		AC	
Reactive Cyanide	<10.0	10.0	10.0	mg/kg	12/22/23 07:00	12/22/23 07:00	EPA 9014/9034	E1	TRG	
Reactive Sulfide	<8.0	8.0	8.0	mg/kg	12/22/23 07:00	12/22/23 07:00	EPA 9014/9034	E1	TRG	
Soil & Waste pH	7.30			pH/°C	12/22/23 07:30	12/22/23 07:30	EPA 9045D		TRG	QpH
Temperature, C.	21.0			pH/°C	12/22/23 07:30	12/22/23 07:30	EPA 9045D	E1	TRG	QpH



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Project Number: Neutralized Waste
Project Manager: Scott Ranalli

Reported:
12/22/23 12:25

Waste Characterization Analysis Parameters - Quality Control

Earth Analytical Sciences, Inc.

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Analyst	Notes
---------	--------	-----------------	-------	-------------	---------------	------	-------------	-----	-----------	---------	-------

Batch B3L0369 - Waste Char. Prep

LCS (B3L0369-BS1)

Prepared & Analyzed: 12/19/23

Ignitability	79		°F	80.0		99	98-102			AC	
--------------	----	--	----	------	--	----	--------	--	--	----	--

Duplicate (B3L0369-DUP1)

Source: 3L08026-01 Prepared & Analyzed: 12/19/23

Ignitability	> 200	70	°F		ND				20	AC	
--------------	-------	----	----	--	----	--	--	--	----	----	--

Batch B3L0439 - Waste Char. Prep

Blank (B3L0439-BLK1)

Prepared & Analyzed: 12/22/23

Reactive Cyanide	<5.0	5.0	mg/kg							TRG	
Reactive Sulfide	<4.0	4.0	mg/kg							TRG	

Duplicate (B3L0439-DUP1)

Source: 3L15038-01 Prepared & Analyzed: 12/22/23

Reactive Cyanide	<10.0	10.0	mg/kg		ND				20	TRG	
Reactive Sulfide	<8.0	8.0	mg/kg		ND				20	TRG	

Batch B3L0441 - Waste Char. Prep

LCS (B3L0441-BS1)

Prepared & Analyzed: 12/22/23

Soil & Waste pH	2.09		pH/°C	2.00		104	0-200			TRG	QpH
-----------------	------	--	-------	------	--	-----	-------	--	--	-----	-----

LCS (B3L0441-BS2)

Prepared & Analyzed: 12/22/23

Soil & Waste pH	12.46		pH/°C	12.4		100	0-200			TRG	QpH
-----------------	-------	--	-------	------	--	-----	-------	--	--	-----	-----

Duplicate (B3L0441-DUP1)

Source: 3L15038-01 Prepared & Analyzed: 12/22/23

Soil & Waste pH	7.30		pH/°C		7.30			0	20	TRG	QpH
Temperature, C.	21.00		pH/°C		21.00			0	20	TRG	QpH



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Martin Operating Partnerships
P.O. Box 6567
Beaumont Texas, 77725

Project: Waste Characterization
Project Number: Neutralized Waste
Project Manager: Scott Ranalli

Reported:
12/22/23 12:25

Qualifiers, Definitions & Notes

QpH Soil pH measured in water at designated temperature

Ign> > 200

mg/L	milligrams per liter	<	Results are less than the reporting limit
mg/kg	milligrams per kilogram	ND	Non Detected at reporting limit
ug/g	microgram per gram	LCS	Laboratory Control Sample
ug/kg	microgram per kilogram	RPD	Relative Percent Difference
ug/L	microgram per liter		

All results are reported on a wet weight basis unless otherwise requested by the client.

If the Blank and/or LCS is qualified, a Case Narrative is included providing details for reporting decisions based on discussions of project management, technical operations and the end data user(Client).

MS/MSD and/or Surrogate results, that are qualified, are sample matrix driven anomalies and therefore, as defined by TNI Standards, not used to determine the validity of the analysis batch.

Client: **Martin Operating Partnership**
Address: **#1 Gulf States Road**
Beaumont, Texas 77704
Contact: **Scott Ranalli**
Phone #:

Waste Characterization

Project: _____

Project #: _____

Location: _____

P.O. #: _____

Fax #: _____

4825 Ward Drive
Beaumont, Texas 77705
Phone: (409) 842-0658 Fax: (409) 842-9793

E.A.S.#

25/10/20

Analysis Requested

[illegible]

MATRIX: (W) Water (WW) Wastewater (L) Liquid (SL) Sludge (S) Soil (SD) Solid (O) Oil

CONTAINER: (GA) Glass Amber (G) Glass (P) Plastic (VOA) 40ml Glass Vial w/Teflon Septum

(EC) EnCore-type Samplers

PRESERVATIVE: (1) H_2SO_4 (2) HNO_3 (3) NaOH/Zinc Acetate (4) HCl (5) $Na_2S_2O_3$ (6) NaOH (7) NaHSO₄ (8) $H_2SO_4/CuSO_4$ (9) NaOH/Ascorbic Acid

FRM-SC1

Revision 5

Page 7 of 18



Summit Environmental Technologies, Inc.
3310 Win St.
Cuyahoga Falls, Ohio 44223
TEL: (330) 253-8211 FAX: (330) 253-4489
Website: <http://www.settek.com>

December 21, 2023

Scott Boudreaux
Earth Analytical Sciences, Inc.
4825 Ward Dr
Beaumont, TX 77705
TEL: (409) 842-0658
FAX: (409) 842-9793
RE: 3L15038

Dear Scott Boudreaux:

Order No.: 23121399

Summit Environmental Technologies, Inc. received 1 sample(s) on 12/19/2023 for the analyses presented in the following report.

There were no problems with the analytical events associated with this report unless noted in the Case Narrative.

Quality control data is within laboratory defined or method specified acceptance limits except where noted.

If you have any questions regarding these tests results, please feel free to call the laboratory.

Sincerely,

A handwritten signature in black ink, appearing to read 'Holly Florea'.

Holly Florea
Project Manager
3310 Win St.
Cuyahoga Falls, Ohio 44223

Arkansas 88-0735, California 2943, Colorado, Connecticut PH-0108, Florida NELAC E87688, Idaho OH00923, Illinois 200061, Indiana C-OH-13, ISO/IEC 17025:2017 119125 L22-544, Kansas E-10347, Kentucky (Underground Storage Tank) 3, Kentucky 90146, Maryland 339, Michigan 9988, Minnesota 1780279, Nevada OH009232020-1, New Hampshire 2996, New Jersey OH006, New York 11777, North Carolina 39705 and 631, North Dakota R-201, Ohio DW, Ohio VAP CL0052, Oklahoma 2019-155, Oregon OH200001, Pennsylvania 68-01335, Rhode Island LA000317, South Carolina 92016001, Texas T104704466-19-16, Utah OH009232020-12, Virginia VELAP 10381, West Virginia 9957C



Summit Environmental Technologies, Inc.
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Cuyahoga Falls, Ohio 44223
TEL: (330) 253-8211 FAX: (330) 253-4489
Website: <http://www.settek.com>

Case Narrative

WO#: 23121399
Date: 12/21/2023

CLIENT: Earth Analytical Sciences, Inc.

Project: 3L15038

This report in its entirety consists of the following documents: Cover Letter, Case Narrative, Analytical Results, QC Summary Report, Applicable Accreditation Information, Chain-of-Custody, Cooler Receipt Form, and other applicable forms as necessary. All documents contain the Summit Environmental Technologies, Inc., Work Order Number assigned to this report.

Summit Environmental Technologies, Inc., holds the accreditations/certifications listed at the bottom of the cover letter that may or may not pertain to this report. Please refer to the "Accreditation Program Analytes Report" for accredited analytes list.

The information contained in this analytical report is the sole property of Summit Environmental Technologies, Inc. and that of the customer. It cannot be reproduced in any form without the consent of Summit Environmental Technologies, Inc. or the customer for which this report was issued. The results contained in this report are only representative of the samples received. Conditions can vary at different times and at different sampling conditions. Summit Environmental Technologies, Inc. is not responsible for use or interpretation of the data included herein.

All results for Solid Samples are reported on an "as received" or "wet weight" basis unless indicated as "dry weight" using the "-dry" designation on the reporting units.

This report is believed to meet all of the requirements of the accrediting agency, where applicable. Any comments or problems with the analytical events associated with this report are noted below.

Original



Summit Environmental Technologies, Inc.
3310 Win St.
Cuyahoga Falls, Ohio 44223
TEL: (330) 253-8211 FAX: (330) 253-4489
Website: <http://www.settek.com>

Workorder Sample Summary

WO#: 23121399

21-Dec-23

CLIENT: Earth Analytical Sciences, Inc.

Project: 3L15038

Lab SampleID	Client Sample ID	Tag No	Date Collected	Date Received	Matrix
23121399-001	3L15038-01		12/15/2023 11:30:00 AM	12/19/2023 10:30:00 AM	Solid



Summit Environmental Technologies, Inc.
3310 Win St.
Cuyahoga Falls, Ohio 44223
TEL: (330) 253-8211 FAX: (330) 253-4489
Website: <http://www.settek.com>

Analytical Report

(consolidated)

WO#: **23121399**

Date Reported: **12/21/2023**

Lab ID: 23121399-001

Collection Date: 12/15/2023 11:30:00 AM

Client Sample ID 3L15038-01

Matrix: SOLID

Analysis	Result	MDL	PQL	Qual	Units	Dilution	Batch	Date Analyzed
METALS ANALYSIS (6010D)					EPA 6010 D		EPA 3050	Analyst: RJE
Sulfur(S)	868	4.81	48.1		mg/Kg	1	71465	12/21/2023 8:38:00 AM

Qualifiers:

B Analyte detected in the associated Method Blank
H Holding times for preparation or analysis exceeded
ND Not Detected
RL Reporting Detection Limit

E Value above quantitation range
M Manual Integration used to determine area response
PL Permit Limit
W Sample container temperature is out of limit as specified at testcode



Summit Environmental Technologies, Inc.
3310 Win St.
Cuyahoga Falls, Ohio 44223
TEL: (330) 253-8211 FAX: (330) 253-4489
Website: <http://www.settek.com>

QC SUMMARY REPORT

WO#: 23121399
21-Dec-23

Client: Earth Analytical Sciences, Inc.
Project: 3L15038

BatchID: 71465

Sample ID: MB-71465	SampType: MBLK	TestCode: Mtl-ICP_S(60)	Units: mg/Kg	Prep Date: 12/19/2023	RunNo: 176723						
Client ID: PBS	Batch ID: 71465	TestNo: SW6010	SW3050B	Analysis Date: 12/20/2023	SeqNo: 4786694						
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Sulfur(S)	ND	48.5									

Sample ID: LCS-71465	SampType: LCS	TestCode: Mtl-ICP_S(60)	Units: mg/Kg	Prep Date: 12/19/2023	RunNo: 176723						
Client ID: LCSS	Batch ID: 71465	TestNo: SW6010	SW3050B	Analysis Date: 12/20/2023	SeqNo: 4786696						
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Sulfur(S)	88.2	467	93.46	0	94.4	80	120				J

Sample ID: LCS-71465	SampType: LCS	TestCode: Mtl-ICP_S(60)	Units: mg/Kg	Prep Date: 12/19/2023	RunNo: 176723						
Client ID: LCSS	Batch ID: 71465	TestNo: SW6010	SW3050B	Analysis Date: 12/20/2023	SeqNo: 4786697						
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Sulfur(S)	393	46.7	467.3	0	84.2	80	120				

Sample ID: 23121275-001AMS	SampType: MS	TestCode: Mtl-ICP_S(60)	Units: mg/Kg-dry	Prep Date: 12/19/2023	RunNo: 176723						
Client ID: BatchQC	Batch ID: 71465	TestNo: SW6010	SW3050B	Analysis Date: 12/20/2023	SeqNo: 4786699						
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Sulfur(S)	1310	45.2	90.44	1313	-4.85	75	125				S

Qualifiers: B Analyte detected in the associated Method Blank
J Analyte detected below quantitation limits
PL Permit Limit
W Sample container temperature is out of limit as specified at testcode

E Value above quantitation range
M Manual Integration used to determine area response
RL Reporting Detection Limit

H Holding times for preparation or analysis exceeded
ND Not Detected
S Spike Recovery outside accepted recovery limits

Original



Summit Environmental Technologies, Inc.
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Cuyahoga Falls, Ohio 44223
TEL: (330) 253-8211 FAX: (330) 253-4489
Website: <http://www.settek.com>

QC SUMMARY REPORT

WO#: 23121399
21-Dec-23

Client: Earth Analytical Sciences, Inc.
Project: 3L15038

BatchID: 71465

Sample ID: 23121275-001AMS	SampType: MS	TestCode: Mtl-ICP_S(60)	Units: mg/Kg-dry	Prep Date: 12/19/2023	RunNo: 176723						
Client ID: BatchQC	Batch ID: 71465	TestNo: SW6010	SW3050B	Analysis Date: 12/20/2023	SeqNo: 4786699						
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual

Sample ID: 23121275-001AMSD	SampType: MSD	TestCode: Mtl-ICP_S(60)	Units: mg/Kg-dry	Prep Date: 12/19/2023	RunNo: 176723						
Client ID: BatchQC	Batch ID: 71465	TestNo: SW6010	SW3050B	Analysis Date: 12/20/2023	SeqNo: 4786700						
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Sulfur(S)	1340	44.0	88.08	1313	25.7	75	125	1308	2.04	20	S

Qualifiers: B Analyte detected in the associated Method Blank
J Analyte detected below quantitation limits
PL Permit Limit
W Sample container temperature is out of limit as specified at testcode

E Value above quantitation range
M Manual Integration used to determine area response
RL Reporting Detection Limit

H Holding times for preparation or analysis exceeded
ND Not Detected
S Spike Recovery outside accepted recovery limits

Original

These commonly used Qualifiers and Acronyms may or may not be present in this report.

Qualifiers

U	The compound was analyzed for but was not detected above the MDL.
J	The reported value is greater than the Method Detection Limit but less than the Reporting Limit.
H	The hold time for sample preparation and/or analysis was exceeded. Not Clean Water Act compliant.
D	The result is reported from a dilution.
E	The result exceeded the linear range of the calibration or is estimated due to interference.
MC	The result is below the Minimum Compound Limit.
*	The result exceeds the Regulatory Limit or Maximum Contamination Limit.
m	Manual integration was used to determine the area response.
d	Manual integration in which peak was deleted
N	The result is presumptive based on a Mass Spectral library search assuming a 1:1 response.
P	The second column confirmation exceeded 25% difference.
C	The result has been confirmed by GC/MS.
X	The result was not confirmed when GC/MS Analysis was performed.
B	The analyte was detected in the Method Blank at a concentration greater than the RL.
MB+	The analyte was detected in the Method Blank at a concentration greater than the MDL.
G	The ICB or CCB contained reportable amounts of analyte.
QC-/+	The CCV recovery failed low (-) or high (+).
R/QDR	The RPD was outside of accepted recovery limits.
QL-/+	The LCS or LCSD recovery failed low (-) or high (+).
QLR	The LCS/LCSD RPD was outside of accepted recovery limits.
QM-/+	The MS or MSD recovery failed low (-) or high (+).
QMR	The MS/MSD RPD was outside of accepted recovery limits.
QV-/+	The ICV recovery failed low (-) or high (+).
S	The spike result was outside of accepted recovery limits.
W	Samples were received outside temperature limits (0° – 6° C). Not Clean Water Act compliant.
Z	Deviation; A deviation from the method was performed; Please refer to the Case Narrative for additional information

Acronyms

ND	Not Detected	RL	Reporting Limit
QC	Quality Control	MDL	Method Detection Limit
MB	Method Blank	LOD	Level of Detection
LCS	Laboratory Control Sample	LOQ	Level of Quantitation
LCSD	Laboratory Control Sample Duplicate	PQL	Practical Quantitation Limit
QCS	Quality Control Sample	CRQL	Contract Required Quantitation Limit
DUP	Duplicate	PL	Permit Limit
MS	Matrix Spike	RegLvl	Regulatory Limit
MSD	Matrix Spike Duplicate	MCL	Maximum Contamination Limit
RPD	Relative Percent Different	MinCL	Minimum Compound Limit
ICV	Initial Calibration Verification	RA	Reanalysis
ICB	Initial Calibration Blank	RE	Reextraction
CCV	Continuing Calibration Verification	TIC	Tentatively Identified Compound
CCB	Continuing Calibration Blank	RT	Retention Time
RLC	Reporting Limit Check	CF	Calibration Factor

This list of Qualifiers and Acronyms reflects the most commonly utilized Qualifiers and Acronyms for reporting. Please refer to the Analytical Notes in the Case Narrative for any Qualifiers or Acronyms that do not appear in this list or for additional information regarding the use of these Qualifiers on reported data.



SUMMIT
ENVIRONMENTAL TECHNOLOGIES, INC.
Analytical Laboratories

Summit Environmental Technologies, Inc.
3310 Win St.
Cuyahoga Falls, Ohio 44223
TEL: (330) 253-8211 FAX: (330) 253-4489
Website: <http://www.settek.com>

DATES REPORT

WO#: 23121399
21-Dec-23

Client: Earth Analytical Sciences, Inc.

Project: 3L15038

Sample ID	Client Sample ID	Collection Date	Matrix	Test Name	Leachate Date	Prep Date	Analysis Date
23121399-001A	3L15038-01	12/15/2023 11:30:00 AM	Solid	Metals Analysis (6010D)		12/20/2023 8:10:00 AM	12/21/2023 8:38:00 AM

Original



Summit Environmental Technologies, Inc.
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Cuyahoga Falls, Ohio 44223
TEL: (330) 253-8211 FAX: (330) 253-4489
Website: <http://www.settek.com>

Accreditation Program Analytes Report

WO#: 23121399
21-Dec-23

Client: Earth Analytical Sciences, Inc.

State: TX

Project: 3L15038

Program Name: TX_DW_NPW_S

Test Name	Matrix	Analyte	Status
Metals Analysis (6010D)	Solid	Sulfur	N

AL	N	Not Accredited	AR	A	Accredited	AR	N	Not Accredited
LA-NELA	N	Not Accredited	CO	U	Unavailable	CT	A	Accredited
CT	N	Not Accredited	L-NELAI	A	Accredited	L-NELAI	N	Not Accredited
HI-DW	N	Not Accredited	ID	U	Unavailable	L-NELAF	A	Accredited
L-NELAF	N	Not Accredited	IN_DW	U	Unavailable	S - NELA	A	Accredited

Original #1

SUBCONTRACT ORDER

Earth Analytical Sciences, Inc.

Project Number: 3L15038

23121399

SENDING LABORATORY:

Earth Analytical Sciences, Inc.
4825 Ward Dr.

Beaumont, TX 77705

Phone: 409-842-0658

Fax: 409-842-9793

Project Manager: Scott Boudreaux

scott@earthanalytical.com

RECEIVING LABORATORY:

Summit Environmental

3310 Win Street

Cuyahoga Falls, OH 44223

Phone : (330) 253-8211

Fax: N/A

State of Origin : TX

PO Number : 3L15038

Sample ID SampleName

3L15038-01 Neutralized Waste

Matrix

Solid

Sampled

12/15/23 11:30

Container type & ID

Containers and Unique ID: Analyses
4 oz., G (B) SUB. - Sulfur

Analysis

Comments

Due Date: 12/20/23 11:00

TAT - 3 DAYS

Released By  Date/Time 12/18/23 @ 1630
Received By  Date/Time 12/19/23 1030
Released By  Date/Time 12/19/23 1030
Received By  Date/Time 12/19/23 1030

Sample Log-In Check List

Client Name: EAR-TX-77705

Work Order Number: 23121399

RcptNo: 1

Logged by: Christina N. Gemma 12/19/2023 10:30:00 AM

Completed By: Christina N. Gemma 12/19/2023 11:53:04 AM

Reviewed By: Salwa A. Najjar 12/19/2023 4:48:32 PM

C. Gemma
C. Gemma
Salwa Najjar

Chain of Custody

1. Is Chain of Custody complete? Yes ☒ No ☐ Not Present ☐
2. How was the sample delivered? FedEx

Log In

3. Coolers are present? Yes ☒ No ☐ NA ☐
4. Shipping container/cooler in good condition? Yes ☒ No ☐
Custody seals intact on shipping container/cooler? Yes ☐ No ☐ Not Present ☒
No. Seal Date: Signed By:
5. Was an attempt made to cool the samples? Yes ☒ No ☐ NA ☐
6. Were all samples received at a temperature of >0° C to 6.0° C Yes ☒ No ☐ NA ☐
7. Sample(s) in proper container(s)? Yes ☒ No ☐
8. Sufficient sample volume for indicated test(s)? Yes ☒ No ☐
9. Are samples (except VOA and ONG) properly preserved? Yes ☒ No ☐
10. Was preservative added to bottles? Yes ☐ No ☒ NA ☐
11. Is the headspace in the VOA vials less than 1/4 inch or 6 mm? Yes ☐ No ☐ No VOA Vials ☒
12. Were any sample containers received broken? Yes ☐ No ☒
13. Does paperwork match bottle labels? Yes ☒ No ☐
(Note discrepancies on chain of custody)
14. Are matrices correctly identified on Chain of Custody? Yes ☒ No ☐
15. Is it clear what analyses were requested? Yes ☒ No ☐
16. Were all holding times able to be met? Yes ☒ No ☐
(If no, notify customer for authorization.)

Special Handling (if applicable)

17. Was client notified of all discrepancies with this order? Yes ☐ No ☐ NA ☒

Person Notified: Date:
By Whom: Via: ☐ eMail ☐ Phone ☐ Fax ☐ In Person
Regarding:
Client Instructions:

18. Additional remarks:

Cooler Information

Cooler No	Temp °C	Condition	Seal Intact	Seal No	Seal Date	Signed By
1	3.9	Good	Not Present			



EAS

4825 Ward Drive, Beaumont, TX 77705 (p) 409-842-0658 (f) 409-842-9793

22 December 2023

EAS NO.: 3L15038

Scott Ranalli
Martin Operating Partnerships
P.O. Box 6567
Beaumont, Texas 77725
RE: Waste Characterization

Project No.: Neutralized Waste

Enclosed are the results of analyses for samples received by the laboratory on 12/15/23 14:53. If you have any questions concerning this report, please feel free to contact me.

Reviewed and Approved:

Scott Boudreaux
Project Manager

Earth Analytical Sciences, Inc. (EAS) warrants that work will be performed in accordance with sound laboratory practice and professional standards, but makes no other warranty, expressed or implied. In the event of any error, omission or other professional negligence, the sole and exclusive responsibility of EAS shall be to re-perform the work at its own expense, and EAS shall have no other liability whatsoever. In no event shall EAS be liable, whether in contract or tort, including negligence, for any incidental or consequential damages. If this provision is in conflict with other contractual terms, it is understood that this provision will, in all cases, prevail. This report can only be reproduced in full with written approval and consent of Earth Analytical Sciences, Inc.



EAS is a NELAP accredited laboratory and meets the guidance requirements put forth by "The NELAC Institute" (2016) for NELAP accredited parameters at EAS, unless noted otherwise. NELAP analyte certifications are considered to be approved in Texas and Louisiana for all analytes, unless denoted with an (E-1) under "Certification". Those analytes certified in either Texas or Louisiana, but not both, will be noted by "Case Narrative".

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4825 Ward Drive
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(f) 409-842-9793

Martin Operating Partnerships
P.O. Box 6567
Beaumont Texas, 77725

Project: Waste Characterization
Project Number: Neutralized Waste
Project Manager: Scott Ranalli

Reported:
12/22/23 12:25

ANALYTICAL REPORT FOR SAMPLES

Sample ID	Laboratory ID	Matrix	Cooler Temp C	Date Sampled	Date Received
Neutralized Waste	3L15038-01	Solid	4.2	12/15/23 11:30	12/15/23 14:53

Sample Receipt Checklist

COC complete w/ required dates, times, signatures?	No
Chain of Custody Seal on Shipping Container?	No
If yes, is seal intact?	No
COC Seals on containers?	No
If yes, is seal intact?	No
Samples received with evidence of chilling?	No
Was a temperature blank used?	No
Samples received were not frozen & acceptable?	No
Are samples received on ice?	No
Therm. ID#200787226. Bias temp. (if appl.) on chain	No
Cooler temperature was acceptable and recorded?	No
Proof of chilling, sampled same day & acceptable?	No
Are sample containers intact (not damaged)?	No
Are acceptable containers used?	No
Were EnCore-Type samplers used, where applicable?	No
Is volume of samples sufficient for all analyses?	No
Are required preservatives documented acceptable?	No
Preserved samples checked for pH and acceptable?	No
Are samples that require adjusted pH documented?	No
VOAs requiring zero headspace have none or <6mm?	No
Are samples received within holding times?	No
Containers properly labeled and COC match labels?	No



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Project: Waste Characterization
Project Number: Neutralized Waste
Project Manager: Scott Ranalli

Reported:
12/22/23 12:25

Case Narrative

Analysis was performed by Summit. A certificate of analysis is enclosed.



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Martin Operating Partnerships
P.O. Box 6567
Beaumont Texas, 77725

Project: Waste Characterization
Project Number: Neutralized Waste
Project Manager: Scott Ranalli

Reported:
12/22/23 12:25

Neutralized Waste

Work Order # : 3L15038-01

Collection Date & Time : 12/15/2023 11:30:00AM

Analyte	Result	Reporting Limit	MDL	Units	Prepared	Analyzed	Method	Cert	Analyst	Notes
Waste Characterization Analysis Parameters										
Ignitability	> 200	70		°F	12/19/23 08:50	12/19/23 08:50	EPA 1010A		AC	
Reactive Cyanide	<10.0	10.0	10.0	mg/kg	12/22/23 07:00	12/22/23 07:00	EPA 9014/9034	E1	TRG	
Reactive Sulfide	<8.0	8.0	8.0	mg/kg	12/22/23 07:00	12/22/23 07:00	EPA 9014/9034	E1	TRG	
Soil & Waste pH	7.30			pH/°C	12/22/23 07:30	12/22/23 07:30	EPA 9045D		TRG	QpH
Temperature, C.	21.0			pH/°C	12/22/23 07:30	12/22/23 07:30	EPA 9045D	E1	TRG	QpH



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Project: Waste Characterization
Project Number: Neutralized Waste
Project Manager: Scott Ranalli

Reported:
12/22/23 12:25

Waste Characterization Analysis Parameters - Quality Control
Earth Analytical Sciences, Inc.

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Analyst	Notes
---------	--------	-----------------	-------	-------------	---------------	------	-------------	-----	-----------	---------	-------

Batch B3L0369 - Waste Char. Prep

LCS (B3L0369-BS1)

Prepared & Analyzed: 12/19/23

Ignitability	79		°F	80.0		99	98-102			AC	
--------------	----	--	----	------	--	----	--------	--	--	----	--

Duplicate (B3L0369-DUP1)

Source: 3L08026-01 Prepared & Analyzed: 12/19/23

Ignitability	> 200	70	°F		ND				20	AC	
--------------	-------	----	----	--	----	--	--	--	----	----	--

Batch B3L0439 - Waste Char. Prep

Blank (B3L0439-BLK1)

Prepared & Analyzed: 12/22/23

Reactive Cyanide	<5.0	5.0	mg/kg							TRG	
Reactive Sulfide	<4.0	4.0	mg/kg							TRG	

Duplicate (B3L0439-DUP1)

Source: 3L15038-01 Prepared & Analyzed: 12/22/23

Reactive Cyanide	<10.0	10.0	mg/kg		ND				20	TRG	
Reactive Sulfide	<8.0	8.0	mg/kg		ND				20	TRG	

Batch B3L0441 - Waste Char. Prep

LCS (B3L0441-BS1)

Prepared & Analyzed: 12/22/23

Soil & Waste pH	2.09		pH/°C	2.00		104	0-200			TRG	QpH
-----------------	------	--	-------	------	--	-----	-------	--	--	-----	-----

LCS (B3L0441-BS2)

Prepared & Analyzed: 12/22/23

Soil & Waste pH	12.46		pH/°C	12.4		100	0-200			TRG	QpH
-----------------	-------	--	-------	------	--	-----	-------	--	--	-----	-----

Duplicate (B3L0441-DUP1)

Source: 3L15038-01 Prepared & Analyzed: 12/22/23

Soil & Waste pH	7.30		pH/°C		7.30			0	20	TRG	QpH
Temperature, C.	21.00		pH/°C		21.00			0	20	TRG	QpH

The results in this report apply to the samples analyzed in accordance with the chain of custody document. This analytical report must be reproduced in its entirety.



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(f) 409-842-9793

Martin Operating Partnerships
P.O. Box 6567
Beaumont Texas, 77725

Project: Waste Characterization
Project Number: Neutralized Waste
Project Manager: Scott Ranalli

Reported:
12/22/23 12:25

Qualifiers, Definitions & Notes

QpH Soil pH measured in water at designated temperature

Ign> > 200

mg/L	milligrams per liter	<	Results are less than the reporting limit
mg/kg	milligrams per kilogram	ND	Non Detected at reporting limit
ug/g	microgram per gram	LCS	Laboratory Control Sample
ug/kg	microgram per kilogram	RPD	Relative Percent Difference
ug/L	microgram per liter		

All results are reported on a wet weight basis unless otherwise requested by the client.

If the Blank and/or LCS is qualified, a Case Narrative is included providing details for reporting decisions based on discussions of project management, technical operations and the end data user(Client).

MS/MSD and/or Surrogate results, that are qualified, are sample matrix driven anomalies and therefore, as defined by TNI Standards, not used to determine the validity of the analysis batch.

CHAIN OF CUSTODY RECORD

Phone: (409) 842-0658 Fax: (409) 842-9793

[illegible]



Summit Environmental Technologies, Inc.
3310 Win St.
Cuyahoga Falls, Ohio 44223
TEL: (330) 253-8211 FAX: (330) 253-4489
Website: <http://www.settek.com>

December 21, 2023

Scott Boudreaux
Earth Analytical Sciences, Inc.
4825 Ward Dr
Beaumont, TX 77705
TEL: (409) 842-0658
FAX: (409) 842-9793
RE: 3L15038

Dear Scott Boudreaux:

Order No.: 23121399

Summit Environmental Technologies, Inc. received 1 sample(s) on 12/19/2023 for the analyses presented in the following report.

There were no problems with the analytical events associated with this report unless noted in the Case Narrative.

Quality control data is within laboratory defined or method specified acceptance limits except where noted.

If you have any questions regarding these tests results, please feel free to call the laboratory.

Sincerely,

Holly Florea
Project Manager
3310 Win St.
Cuyahoga Falls, Ohio 44223

Arkansas 88-0735, California 2943, Colorado, Connecticut PH-0108, Florida NELAC E87688, Idaho OH00923, Illinois 200061, Indiana C-OH-13, ISO/IEC 17025:2017 119125 L22-544, Kansas E-10347, Kentucky (Underground Storage Tank) 3, Kentucky 90146, Maryland 339, Michigan 9988, Minnesota 1780279, Nevada OH009232020-1, New Hampshire 2996, New Jersey OH006, New York 11777, North Carolina 39705 and 631, North Dakota R-201, Ohio DW, Ohio VAP CL0052, Oklahoma 2019-155, Oregon OH200001, Pennsylvania 68-01335, Rhode Island LA000317, South Carolina 92016001, Texas T104704466-19-16, Utah OH009232020-12, Virginia VELAP 10381, West Virginia 9957C



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Case Narrative

WO#: 23121399
Date: 12/21/2023

CLIENT: Earth Analytical Sciences, Inc.

Project: 3L15038

This report in its entirety consists of the following documents: Cover Letter, Case Narrative, Analytical Results, QC Summary Report, Applicable Accreditation Information, Chain-of-Custody, Cooler Receipt Form, and other applicable forms as necessary. All documents contain the Summit Environmental Technologies, Inc., Work Order Number assigned to this report.

Summit Environmental Technologies, Inc., holds the accreditations/certifications listed at the bottom of the cover letter that may or may not pertain to this report. Please refer to the "Accreditation Program Analytes Report" for accredited analytes list.

The information contained in this analytical report is the sole property of Summit Environmental Technologies, Inc. and that of the customer. It cannot be reproduced in any form without the consent of Summit Environmental Technologies, Inc. or the customer for which this report was issued. The results contained in this report are only representative of the samples received. Conditions can vary at different times and at different sampling conditions. Summit Environmental Technologies, Inc. is not responsible for use or interpretation of the data included herein.

All results for Solid Samples are reported on an "as received" or "wet weight" basis unless indicated as "dry weight" using the "-dry" designation on the reporting units.

This report is believed to meet all of the requirements of the accrediting agency, where applicable. Any comments or problems with the analytical events associated with this report are noted below.

Original



Summit Environmental Technologies, Inc.
3310 Win St.
Cuyahoga Falls, Ohio 44223
TEL: (330) 253-8211 FAX: (330) 253-4489
Website: <http://www.settek.com>

Workorder Sample Summary

WO#: 23121399

21-Dec-23

CLIENT: Earth Analytical Sciences, Inc.

Project: 3L15038

Lab SampleID	Client Sample ID	Tag No	Date Collected	Date Received	Matrix
23121399-001	3L15038-01		12/15/2023 11:30:00 AM	12/19/2023 10:30:00 AM	Solid



Summit Environmental Technologies, Inc.
3310 Win St.
Cuyahoga Falls, Ohio 44223
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Website: <http://www.settek.com>

Analytical Report

(consolidated)

WO#: 23121399

Date Reported: 12/21/2023

Lab ID: 23121399-001

Collection Date: 12/15/2023 11:30:00 AM

Client Sample ID 3L15038-01

Matrix: SOLID

Analysis	Result	MDL	PQL	Qual	Units	Dilution	Batch	Date Analyzed
METALS ANALYSIS (6010D)					EPA 6010 D		EPA 3050	Analyst: RJE
Sulfur(S)	868	4.81	48.1		mg/Kg	1	71465	12/21/2023 8:38:00 AM

Qualifiers:

B Analyte detected in the associated Method Blank
H Holding times for preparation or analysis exceeded
ND Not Detected
RL Reporting Detection Limit

E Value above quantitation range
M Manual Integration used to determine area response
PL Permit Limit
W Sample container temperature is out of limit as specified at testcode



Summit Environmental Technologies, Inc.
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QC SUMMARY REPORT

WO#: 23121399

21-Dec-23

Client: Earth Analytical Sciences, Inc.

Project: 3L15038

BatchID: 71465

Sample ID: MB-71465	SampType: MBLK	TestCode: Mtl-ICP_S(60	Units: mg/Kg	Prep Date: 12/19/2023	RunNo: 176723						
Client ID: PBS	Batch ID: 71465	TestNo: SW6010	SW3050B	Analysis Date: 12/20/2023	SeqNo: 4786694						
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Sulfur(S)	ND	48.5									

Sample ID: LCS-71465	SampType: LCS	TestCode: Mtl-ICP_S(60	Units: mg/Kg	Prep Date: 12/19/2023	RunNo: 176723						
Client ID: LCSS	Batch ID: 71465	TestNo: SW6010	SW3050B	Analysis Date: 12/20/2023	SeqNo: 4786696						
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Sulfur(S)	88.2	467	93.46	0	94.4	80	120				J

Sample ID: LCS-71465	SampType: LCS	TestCode: Mtl-ICP_S(60 Units: mg/Kg				Prep Date: 12/19/2023			RunNo: 176723		
Client ID: LCSS	Batch ID: 71465	TestNo: SW6010		SW3050B		Analysis Date: 12/20/2023			SeqNo: 4786697		
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Sulfur(S)	393	46.7	467.3	0	84.2	80	120				

Sample ID: 23121275-001AMS	SampType: MS	TestCode: Mtl-ICP_S(60	Units: mg/Kg-dry	Prep Date: 12/19/2023	RunNo: 176723						
Client ID: BatchQC	Batch ID: 71465	TestNo: SW6010	SW3050B	Analysis Date: 12/20/2023	SeqNo: 4786699						
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Sulfur(S)	1310	45.2	90.44	1313	-4.85	75	125				S

Qualifiers:
B Analyte detected in the associated Method Blank
J Analyte detected below quantitation limits
PL Permit Limit
W Sample container temperature is out of limit as specified at testcode

E Value above quantitation range
M Manual Integration used to determine area response
RL Reporting Detection Limit

H Holding times for preparation or analysis exceeded
ND Not Detected
S Spike Recovery outside accepted recovery limits



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Cuyahoga Falls, Ohio 44223
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Website: <http://www.settek.com>

QC SUMMARY REPORT

WO#: 23121399

21-Dec-23

Client: Earth Analytical Sciences, Inc.

Project: 3L15038

BatchID: 71465

Sample ID: 23121275-001AMS	SampType: MS	TestCode: Mtl-ICP_S(60	Units: mg/Kg-dry	Prep Date: 12/19/2023	RunNo: 176723						
Client ID: BatchQC	Batch ID: 71465	TestNo: SW6010	SW3050B	Analysis Date: 12/20/2023	SeqNo: 4786699						
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual

Sample ID: 23121275-001AMSD	SampType: MSD	TestCode: Mtl-ICP_S(60	Units: mg/Kg-dry	Prep Date: 12/19/2023	RunNo: 176723						
Client ID: BatchQC	Batch ID: 71465	TestNo: SW6010	SW3050B	Analysis Date: 12/20/2023	SeqNo: 4786700						
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Sulfur(S)	1340	44.0	88.08	1313	25.7	75	125	1308	2.04	20	S

Qualifiers:

- B Analyte detected in the associated Method Blank
- J Analyte detected below quantitation limits
- PL Permit Limit
- W Sample container temperature is out of limit as specified at testcode

- E Value above quantitation range
- M Manual Integration used to determine area response
- RL Reporting Detection Limit

- H Holding times for preparation or analysis exceeded
- ND Not Detected
- S Spike Recovery outside accepted recovery limits

These commonly used Qualifiers and Acronyms may or may not be present in this report.

Qualifiers

U	The compound was analyzed for but was not detected above the MDL.
J	The reported value is greater than the Method Detection Limit but less than the Reporting Limit.
H	The hold time for sample preparation and/or analysis was exceeded. Not Clean Water Act compliant.
D	The result is reported from a dilution.
E	The result exceeded the linear range of the calibration or is estimated due to interference.
MC	The result is below the Minimum Compound Limit.
*	The result exceeds the Regulatory Limit or Maximum Contamination Limit.
m	Manual integration was used to determine the area response.
d	Manual integration in which peak was deleted
N	The result is presumptive based on a Mass Spectral library search assuming a 1:1 response.
P	The second column confirmation exceeded 25% difference.
C	The result has been confirmed by GC/MS.
X	The result was not confirmed when GC/MS Analysis was performed.
B	The analyte was detected in the Method Blank at a concentration greater than the RL.
MB+	The analyte was detected in the Method Blank at a concentration greater than the MDL.
G	The ICB or CCB contained reportable amounts of analyte.
QC-/+	The CCV recovery failed low (-) or high (+).
R/QDR	The RPD was outside of accepted recovery limits.
QL-/+	The LCS or LCSD recovery failed low (-) or high (+).
QLR	The LCS/LCSD RPD was outside of accepted recovery limits.
QM-/+	The MS or MSD recovery failed low (-) or high (+).
QMR	The MS/MSD RPD was outside of accepted recovery limits.
QV-/+	The ICV recovery failed low (-) or high (+).
S	The spike result was outside of accepted recovery limits.
W	Samples were received outside temperature limits (0° – 6° C). Not Clean Water Act compliant.
Z	Deviation; A deviation from the method was performed; Please refer to the Case Narrative for additional information

Acronyms

ND	Not Detected	RL	Reporting Limit
QC	Quality Control	MDL	Method Detection Limit
MB	Method Blank	LOD	Level of Detection
LCS	Laboratory Control Sample	LOQ	Level of Quantitation
LCSD	Laboratory Control Sample Duplicate	PQL	Practical Quantitation Limit
QCS	Quality Control Sample	CRQL	Contract Required Quantitation Limit
DUP	Duplicate	PL	Permit Limit
MS	Matrix Spike	RegLvl	Regulatory Limit
MSD	Matrix Spike Duplicate	MCL	Maximum Contamination Limit
RPD	Relative Percent Different	MinCL	Minimum Compound Limit
ICV	Initial Calibration Verification	RA	Reanalysis
ICB	Initial Calibration Blank	RE	Reextraction
CCV	Continuing Calibration Verification	TIC	Tentatively Identified Compound
CCB	Continuing Calibration Blank	RT	Retention Time
RLC	Reporting Limit Check	CF	Calibration Factor

This list of Qualifiers and Acronyms reflects the most commonly utilized Qualifiers and Acronyms for reporting. Please refer to the Analytical Notes in the Case Narrative for any Qualifiers or Acronyms that do not appear in this list or for additional information regarding the use of these Qualifiers on reported data.



SUMMIT
ENVIRONMENTAL TECHNOLOGIES, INC.
Analytical Laboratories

Summit Environmental Technologies, Inc.
3310 Win St.
Cuyahoga Falls, Ohio 44223
TEL: (330) 253-8211 FAX: (330) 253-4489
Website: <http://www.settek.com>

DATES REPORT

WO#: 23121399
21-Dec-23

Client: Earth Analytical Sciences, Inc.
Project: 3L15038

Sample ID	Client Sample ID	Collection Date	Matrix	Test Name	Leachate Date	Prep Date	Analysis Date
23121399-001A	3L15038-01	12/15/2023 11:30:00 AM	Solid	Metals Analysis (6010D)		12/20/2023 8:10:00 AM	12/21/2023 8:38:00 AM

Original



Summit Environmental Technologies, Inc.
3310 Win St.
Cuyahoga Falls, Ohio 44223
TEL: (330) 253-8211 FAX: (330) 253-4489
Website: <http://www.settek.com>

Accreditation Program Analytes Report

WO#: 23121399
21-Dec-23

Client: Earth Analytical Sciences, Inc.

State: TX

Project: 3L15038

Program Name: TX_DW_NPW_S

Test Name	Matrix	Analyte	Status
Metals Analysis (6010D)	Solid	Sulfur	N

AL	N	Not Accredited	AR	A	Accredited	AR	N	Not Accredited
A-NELA	N	Not Accredited	CO	U	Unavailable	CT	A	Accredited
CT	N	Not Accredited	L-NELAI	A	Accredited	L-NELAI	N	Not Accredited
HI-DW	N	Not Accredited	ID	U	Unavailable	L-NELAF	A	Accredited
L-NELAF	N	Not Accredited	IN_DW	U	Unavailable	S - NELA	A	Accredited

Original #1

SUBCONTRACT ORDER

Earth Analytical Sciences, Inc.

Project Number: 3L15038

23121399

SENDING LABORATORY:

Earth Analytical Sciences, Inc.

4825 Ward Dr.

Beaumont, TX 77705

Phone: 409-842-0658

Fax: 409-842-9793

Project Manager: Scott Boudreaux

scott@earthanalytical.com

RECEIVING LABORATORY:

Summit Environmental

3310 Win Street

Cuyahoga Falls, OH 44223

Phone : (330) 253-8211

Fax: N/A

State of Origin : TX

Due Date: 12/20/23 11:00

PO Number : 3L15038

TAT-3DAYS

Sample ID	SampleName	Matrix	Sampled	Container type & ID	Analysis	Comments
3L15038-01	Neutralized Waste	Solid	12/15/23 11:30	Containers and Unique ID: 4 oz., G (B)	Analyses SUB. - Sulfur	

Released By

Date/Time

Received By

Date/Time

Released By

Date/Time

Received By
Page 10 of 11

Date/Time

Sample Log-In Check List

Client Name: EAR-TX-77705

Work Order Number: 23121399

RcptNo: 1

Logged by: Christina N. Gemma 12/19/2023 10:30:00 AM

Completed By: Christina N. Gemma 12/19/2023 11:53:04 AM

Reviewed By: Salwa A. Najjar 12/19/2023 4:48:32 PM

C. Gemma
C. Gemma
Salwa Najjar

Chain of Custody

1. Is Chain of Custody complete? Yes ☒ No ☐ Not Present ☐
2. How was the sample delivered? FedEx

Log In

3. Coolers are present? Yes ☒ No ☐ NA ☐
4. Shipping container/cooler in good condition? Yes ☒ No ☐
Custody seals intact on shipping container/cooler? Yes ☐ No ☐ Not Present ☒
No. Seal Date: Signed By:
5. Was an attempt made to cool the samples? Yes ☒ No ☐ NA ☐
6. Were all samples received at a temperature of >0° C to 6.0° C Yes ☒ No ☐ NA ☐
7. Sample(s) in proper container(s)? Yes ☒ No ☐
8. Sufficient sample volume for indicated test(s)? Yes ☒ No ☐
9. Are samples (except VOA and ONG) properly preserved? Yes ☒ No ☐
10. Was preservative added to bottles? Yes ☐ No ☒ NA ☐
11. Is the headspace in the VOA vials less than 1/4 inch or 6 mm? Yes ☐ No ☐ No VOA Vials ☒
12. Were any sample containers received broken? Yes ☐ No ☒
13. Does paperwork match bottle labels? Yes ☒ No ☐
(Note discrepancies on chain of custody)
14. Are matrices correctly identified on Chain of Custody? Yes ☒ No ☐
15. Is it clear what analyses were requested? Yes ☒ No ☐
16. Were all holding times able to be met? Yes ☒ No ☐
(If no, notify customer for authorization.)

Special Handling (if applicable)

17. Was client notified of all discrepancies with this order? Yes ☐ No ☐ NA ☒

Person Notified: Date:
By Whom: Via: ☐ eMail ☐ Phone ☐ Fax ☐ In Person
Regarding:
Client Instructions:

18. Additional remarks:

Cooler Information

Cooler No	Temp °C	Condition	Seal Intact	Seal No	Seal Date	Signed By
1	3.9	Good	Not Present			



Hydrated Lime – January 27, 2020

SAFETY DATA SHEET

SECTION 1	IDENTIFICATION
-----------	----------------

Product

Name: Hydrated Lime

Other Names: Hydrate; High-Calcium Hydrated Lime

Recommended Uses: Water Treatment; pH adjustment; FGT; Construction

Company Identification:

US Operations:

Lhoist North America, Inc.
5600 Clearfork Main St, Ste. 300
Fort Worth, TX 76109
817-732-8164

Canadian Operations:

Lhoist North America of Canada, Inc.
20303-102B Ave.
Langley, BC V1M 3H1
604-888-4333

Emergency Phone Number:

Chemtrec 1-800-424-9300

SECTION 2	HAZARDS(S) IDENTIFICATION
-----------	---------------------------

Classification

Eye Damage – Category 1

Carcinogen – Category 1

Skin Irritation – Category 2

Specific Target Organ Toxicity Single Exposure – Category 3
(Respiratory System)

Specific Target Organ Toxicity Repeat Exposure – Category 1
(Respiratory System)

Labeling:

Pictograms:



Signal Word(s): Danger



Hydrated Lime – January 27, 2020

Hazard Statements: Causes serious eye damage.
Causes skin irritation.
May cause respiratory irritation.
Causes damage to lungs through prolonged or repeated exposure when inhaled.
May cause cancer through inhalation.

Precautionary Statements:

Wear protective gloves and eye protection. Wash exposed skin thoroughly after handling. Do not breathe dust. Use only outdoors or in a well-ventilated area. Obtain special instructions before use. Do not handle until all safety precautions have been read and understood. Do not eat, drink or smoke when using this product.

If on skin: wash exposed skin with plenty of water. If skin irritation occurs: Get medical attention. Take off contaminated clothing and wash it before reuse.

If in eyes: Rinse cautiously with water for several minutes. Remove contact lenses if present and easy to do. Continue rinsing. Seek medical attention immediately. If inhaled: Remove person to fresh air and keep comfortable for breathing. Seek medical attention if you feel unwell.

If exposed or concerned: Get medical advice

Dispose of contents or containers in accordance with applicable regulations.

Other Hazards: None.

SECTION 3	COMPOSITION/ INFORMATION ON INGREDIENTS
-----------	---

Chemical Name: Calcium hydroxide

Common names and synonyms: Hydrate; High-Calcium Hydrated Lime

Chemical Identity	CAS #	Concentration, % Wt.
Calcium Hydroxide	1305-62-0	> 90%
Magnesium Oxide	1309-48-4	< 3%
Crystalline Silica	14808-60-7	< 2%



SECTION 4	FIRST AID MEASURES
Eye Contact:	Contact can cause severe irritation or burning of eyes, including permanent damage. Immediately flush eyes with generous amounts of water for as long as needed. This may take several minutes. Pull back the eyelid to ensure that all lime dust has been washed out. Seek medical attention immediately. Do not rub eyes.
Inhalation:	This product can cause severe irritation of the respiratory system. Move victim to fresh air. Seek medical attention if necessary. If breathing has stopped, give artificial respiration.
Skin Contact:	Contact can cause severe irritation or burning of skin, especially in the presence of moisture. Wash exposed area with large amounts of water. Seek medical attention immediately.
Ingestion:	This product can cause severe irritation or burning of gastrointestinal tract if swallowed. Do not induce vomiting. Seek medical attention immediately. Never give anything by mouth unless instructed to do so by medical personnel.
Most important symptoms and effects, both acute and delayed:	Irritation of skin, eyes, gastrointestinal tract or respiratory tract. Long-term exposure by inhalation may cause permanent damage. This product contains crystalline silica, which has been classified by IARC as (Group I) carcinogenic to humans when inhaled. Inhalation of silica can also cause a chronic lung disorder, silicosis.
Note to Physician: Provide general supportive measures and treat symptomatically.	

SECTION 5	FIREFIGHTING MEASURES
Extinguishing Media	
Appropriate Extinguishing Media: Use dry chemical fire extinguisher	
Inappropriate Extinguishing Media: Do not use halogenated compounds.	

Firefighting

Fire Hazards: Hydrated Lime is not combustible or flammable. Hydrated Lime is not considered to be an explosive hazard, although reaction with incompatible materials may rupture containers.



Hazardous Combustion Products: None

Special Protective Equipment and Fire Fighting Instructions: Keep personnel away from and upwind of fire. Wear full fire-fighting turn-out gear (full Bunker gear), and respiratory protection (SCBA).

SECTION 6

ACCIDENTAL RELEASE MEASURES

Personal Precautions: Use proper protective equipment.

Environmental Precautions: For large spills, as much as possible, avoid the generation of dusts. Prevent release to sewers or waterways.

Methods and Materials for Containment and Cleaning Up:

Small Spills: Use dry methods to collect spilled materials. Avoid generating dust. Do not clean up with compressed air. Store collected materials in dry, sealed plastic or metal containers. Residue on surfaces may be washed with water or dilute vinegar.

Large Spills: Use dry methods to collect spilled materials. Evacuate area downwind of clean-up operations to minimize dust exposure. Store spilled materials in dry, sealed plastic or metal containers.

SECTION 7

HANDLING AND STORAGE

Precautions for Safe Handling: Keep in tightly closed containers. Protect containers from physical damage. Avoid direct skin contact with the material.

Conditions for Safe Storage, Including any Incompatibilities: Store in a cool, dry, and well-ventilated location. Do not store near incompatible materials (see Section 10 below). Keep away from moisture. Do not store or ship in aluminum containers.

SECTION 8

EXPOSURE CONTROLS/ PERSONAL PROTECTION

Control Parameters:

Component	CAS #	Exposure Limits
Calcium Hydroxide	1305-62-0	OSHA PEL: 15 mg/m ³ (total) 5 mg/m ³ (respirable) ACGIH TLV: 5 mg/m ³
Magnesium Oxide	1309-48-4	OSHA PEL: 15 mg/m ³ ACGIH TLV: 10 mg/m ³
Crystalline Silica	14808-60-7	OSHA PEL: 0.050 mg/m ³ as an 8 hr. TWA (respirable) ACGIH TLV: 0.025 mg/m ³ (respirable)



Hydrated Lime – January 27, 2020

Appropriate Engineering Controls: Provide ventilation adequate to maintain PELs.

Personal Protection

Respiratory Protection: Use NIOSH approved respirators if airborne concentration exceeds PEL.

Eye Protection: Use safety glasses with side shields or safety goggles. Contact lenses should not be worn when working with lime products.

Skin Protection: If there is a risk of skin contact, wear appropriate clothing and gloves to prevent contact.

Other: Eye wash fountain and emergency showers are recommended.

SECTION 9	PHYSICAL AND CHEMICAL PROPERTIES
-----------	----------------------------------

Appearance

Physical State: Solid

Color: White

Odor: Odorless

Odor Threshold: N/ A

pH: 12.44 @ 25° C when made into a saturated solution

Melting Point: N/ AF

Initial Boiling Point: N/ A

Freezing Point: N/ A

Flash Point: N/ A

Evaporation Rate: N/ A

Flammability (solid, gas): Non-flammable

Explosion Limits: N/ A

Vapor Pressure: N/ A

Vapor Density: N/ A

Relative Density: 0.4 – 0.7 g/ cm³ (apparent)

Solubility(ies): Solubility is 1.6 g/L at 25° C



Hydrated Lime – January 27, 2020

Partition coefficient: Relatively insoluble

Auto-ignition Temperature: N/ A

Decomposition Temperature: 580° C / 1076° F

Viscosity: N/A

SECTION 10	STABILITY AND REACTIVITY
-------------------	---------------------------------

Reactivity:

Chemical Stability: Hydrated Lime is chemically stable.

Possibility of Hazardous Reactions: See reactivity above

Conditions to Avoid: Do not allow Hydrated Lime to come into contact with incompatible materials.

Incompatible Materials: Hydrated Lime should not be mixed or stored with the following materials, due to the potential for violent reaction and release of heat:

- Acids (unless in a controlled process)
- Reactive Fluoridated Compounds
- Reactive Brominated Compounds
- Reactive Powdered Metals
- Organic Acid Anhydrides
- Nitro-Organic Compounds
- Reactive Phosphorous Compounds
- Interhalogenated Compounds

Hazardous Decomposition Products: None

SECTION 11	TOXICOLOGICAL INFORMATION
-------------------	----------------------------------

Health Effects: see First Aid discussion in Section 4

Routes of Exposure: see First Aid discussion in Section 4

Symptoms Related to Exposure: see First Aid discussion in Section 4

Carcinogen Listing: Hydrated Lime is not listed by MSHA, OSHA, or IARC as a carcinogen, but this product contains crystalline silica, which has been classified by IARC as (Group I) carcinogenic to humans when inhaled.

SECTION 12	ECOLOGICAL INFORMATION
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Ecotoxicity: Because of the high pH of this product, it would be expected to produce significant ecotoxicity upon exposure to aquatic organisms and aquatic systems in high concentrations.



Hydrated Lime – January 27, 2020

Persistence and Degradability: Reacts with atmospheric CO₂ over time to form calcium carbonate

Bioaccumulation Potential: This material shows no bioaccumulation effect or food chain concentration toxicity.

Mobility in Soil: Minimal mobility in soil. Reacts with clay portion of soil to form calcium silicates and calcium aluminates

Other Adverse Effects: This material is alkaline and if released into water or moist soil will cause an increase in pH

SECTION 13	DISPOSAL CONSIDERATIONS
------------	-------------------------

Disposal Recommendations: Dispose of in accordance with all applicable federal, state, and local environmental regulations.

Regulatory Disposal Information: If this product as supplied, and unmixed, becomes a waste, it will not meet the criteria of a hazardous waste as defined under the Resource Conservation and Recovery Act.

SECTION 14	TRANSPORT INFORMATION
------------	-----------------------

UN Number: Not Regulated

UN Proper Shipping Name: Not Regulated

Transport Hazard Class(es): Not Regulated

Packing Group: Not Regulated

Marine Pollutant (y/n): This material is alkaline and if released into water or moist soil will cause an increase in pH.

Special Precautions: None

SECTION 15	REGULATORY INFORMATION
------------	------------------------

National Chemical Inventory Listings:

All chemical ingredients are listed on the USEPA TSCA Inventory List.

US Regulations:

RCRA Hazardous Waste Number: not listed (40 CFR 261.33)

RCRA Hazardous Waste Classification (40 CFR 261): not classified

CERCLA Hazardous Substance (40 CFR 302.4) unlisted specific per RCRA, Sec. 3001;

CWA, Sec. 311 (b) (4); CWA, Sec. 307(a), CAA, Sec. 112

CERCLA Reportable Quantity (RQ) not listed.

SARA 311/312 Codes: not listed.

SARA Toxic Chemical (40 CFR 372.65): not listed.

SARA EHS (Extremely Hazardous Substance) (40 CFR 355): Not listed, Threshold Planning Quantity (TPQ): not listed



Hydrated Lime – January 27, 2020

Specific State Regulations: ⚠️ WARNING: This product can expose you to chemicals, including crystalline silica, which is known to the State of California to cause cancer. For more information, go to www.P65Warnings.ca.gov

These naturally occurring impurities may also be regulated by other States.

Canadian DSL: Listed

Canadian NPRI: None of the components are listed

CEPA Toxic Substances: None of the components are listed

SECTION 16	OTHER INFORMATION
------------	-------------------

Prepared By: Lhoist North America Technical Services

Date Prepared: January 27, 2020

Revision: 2020-1

Abbreviations:

N/A	Not Available or Not Applicable
IARC	International Agency for Research on Cancer
IATA	International Air Transport Association
ACGIH	ACGIH American Conference of Governmental Industrial Hygienists
TWA	Time Weighted Average
PEL	Permissible Exposure Limit
TLV	Threshold Limit Value
REL	Recommended Exposure Limit

Lhoist North America provides the information contained herein in good faith but makes no representation as to its comprehensiveness or accuracy. This document is intended only as a guide to the appropriate precautionary handling of the material by a properly trained person. Individuals receiving this information must consult their own technical and legal advisors and/or exercise their own judgment in determining its appropriateness for a particular purpose. Lhoist North America makes no representations or warranties, either express or implied, including without limitation and warranties of merchantability or fitness for a particular purpose with respect to the Information set forth herein or the product(s) to which the information refers. Accordingly, Lhoist North America will not be responsible or liable for any claims, losses or damages resulting from the use of or reliance upon or failure to use this information.

APPENDIX 6. MARPOL COA AND VAPOR COMBUSTION UNIT APPROVAL

United States Coast Guard

Certificate Of Adequacy for Reception Facility



This certifies that: Martin Operating Partnership LP-Stanolind has facilities adequate MARPOL I
Terminal to receive MARPOL II
Beaumont
Texas
UNITED STATES MARPOL V

From oceangoing ships, as required by the International Convention for the Prevention of Pollution from Ships, 1973. As modified by the protocol of 1978 (MARPOL 73/78). The Act to Prevent Pollution from Ships, 33 USC 1901-1912 and associated U.S. Regulations in 33 CFR 158.

This certificate is issued pursuant to an application dated 28JUL2021 and an inspection dated 20JUL2021, copies of which are attached, and part of this certificate. Each terminal listed in the application shall maintain a copy of this certificate available for inspection by Coast Guard personnel and the master, operator, agent, or owner of any ship using or intending to use this terminal.

Terminals and ports required to have an operations manual for oil transfer described in 33 CFR 154.300 shall attach a copy of this certificate thereto.

The terminal port person in charge identified in the attached application shall notify the U.S. Coast Guard Captain of the Port (COTP) in writing after any of the reception facility information or terminal/port information identified in 33 CFR 158.165 changes.

The terminal port owner, operator, or person in charge is liable for violations of the provisions of 33 CFR 158 and may be subject to the maximum penalty under 33 USC 1908, as adjusted for inflation and found at 33 CFR 27.3.

The terminal port owner, operator, or person in charge shall ensure that the reception facility holds each state, local, and federal permit and license required by environmental laws and regulations concerning garbage, residues and mixtures containing oil or noxious liquid substances. This certificate certifies compliance with applicable sections of 33 CFR 158, but does not certify compliance with any other law or regulation.

This certificate is valid for a period of 5 years from the date issuance; or until suspended or revoked, or until 30 days after the operator cited on the certificate changes, at which time it shall be promptly returned to the U.S. Coast Guard COTP.

This Certificate Expires:

28JUL2026

5 years from date of issuance

K. A. Hantal
Signature of COTP

28 JUL 2021
Date

K. A. Hantal, CDR, USCG, By direction

28 JUL 2021
Date

Typed Name of COTP

Date

Marine Safety Unit Port Arthur

(409)723-6500

COTP Zone

Phone

The following waivers to this certificate are granted. The waivers shall be attached to and are part of this certificate.

Waiver Description (brief description)

Expire Date (if applicable)



WARNER NICHOLSON CONSULTANTS, PLLC

PO Box 24; Wellborn, TX 77881

www.vaporcontrol.com

USCG Certification Letter

For

Martin Midstream LP: Beaumont, Texas. (PATMS115)
Stanolind Cut Terminal

Marine Dock MVCS

MSU Port Arthur

Issued on: April 25, 2022

by

Warner Nicholson Consultants, PLLC
a USCG Certifying Entity

Jon W. Young, P.E.
Steven Jennings

mobile: 918.630.4473
mobile: 479-650-4214

email: jyoung@vaporcontrol.com
email: sjennings@vaporcontrol.com



WARNER NICHOLSON CONSULTANTS, PLLC

PO Box 24; Wellborn, TX 77881

www.vaporcontrol.com

April 25, 2022

Martin Midstream Partners, LP
Stanolind Cut Terminal
#10 Sulphur Plant Road
Beaumont, Texas 77701

Reference: USCG Certification Letter for Marine VCS at Martin Midstream Partners, Beaumont, Texas (FIN: PATMS115)

To Whom It May Concern:

On March 15 & 17 and April 22, 2022, Warner Nicholson Consultants, PLLC (WN) performed the required on-site inspection and review of the Martin Midstream Partners LP (Martin) Marine Vapor Control System (MVCS) at the Stanolind Cut Terminal in Beaumont, Texas. The Martin MVCS is located in Beaumont on west shore of Neches River near Sulphur Plant Road. The MVCS was manufactured by Jordan Technologies a Cimarron Company (Jordan) and jointly installed by Jordan and Martin. The final part of the inspection was the witnessed operational loading test, which occurred on April 22, 2022. The operational test load successfully demonstrated a non-inert loading capacity of 3,000 barrels per hour (bph) of crude oil.

The MVCS consists of single dock safety skid (DSS) with 4" detonation arrester, inlet and outlet connections and one (1) Vapor Blower, one (1) Knockout Vessel and one (1) Vapor Combustion Unit (VCU). The vapor blower is a 10 hp centrifugal blower. The knockout vessel is a thirty-inch (36") diameter by six-foot (6') tangent-to-tangent vertical vessel. The VCU has a 5 foot, 6-inch (5.5') diameter by forty foot (40') vertical stack. This is a new facility, there is not a previously installed MVCS at this location.

Functional tests (dry checks) of the MVCS were performed on August 15 & 17, 2022. The operational test load was conducted on April 22, 2022. The vessel used for the test load was the non-inerted barge *Gonsoulin-555*.

The MVCS is designed and reviewed to control vapors from non-inerted vessel transfer operations for the cargos and at the rates listed below in Table 1. **Inerted loading is not certified for this MVCS.**

Table 1 – Design Cargo List and Transfer Rates

Product	CHRIS Name	CHRIS Code	Martin. Combined Non-Inert Transfer Rate (bph)
Crude Oil	Oils: Crude	OIL	2,800

APPLICABLE REGULATIONS

The following regulations were used in the evaluation of the Martin MVCS.

- (i) 33 CFR 154 Subpart P Vapor Control Systems.
- (ii) *Certifying Entity Guidelines for Conducting a Review, Certification and Initial Inspection of a Waterside Facility Vapor Control Systems*, dated October 4, 1991 and revised April 20, 1992.
- (iii) CG-ENG Policy Letter No. 02-16. *Clarification and Guidance for Implementation of Marine Vapor Control Systems (VCS); Exemption and Certification, Detonation Arrestors, and Anti-Flashback Burners.*

CERTIFICATION:

WN certifies that the MVCS owned and operated by Martin in Beaumont, Texas:

- 1) Conforms to the certified plans and specifications,
- 2) Meets the applicable requirements of 33 CFR 154, Subpart P.
- 3) Complies with its Operations Manual.

CERTIFIED LOADING RATE:

During the operational test load of April 22, 2022, Martin and Jordan demonstrated the proper operation of the MVCS. They achieved a capacity of approximately 2,700 barrels per hour (bph) of crude oil. This is the maximum capacity of the cargo transfer pump used to load marine vessels. Based on the excess capacity of the MVCS observed, WN can confirm through the observations of the relevant portions of the loading test that the MVCS can safely process vapors up to the cargo transfer rates listed in Table 2 below.

Table 2 outlines the certified capacity of the Martin MVCS.

Table 2 – Certified Cargo List and Transfer Rates

Product	CHRIS Name	CHRIS Code	Max. Non-Inert Transfer Rate (bph)
Crude Oil	Oils: Crude	OIL	3,000



EXEMPTIONS:

An exemption was issued in a letter dated February 17, 2022 and signed by Lieutenant Commander D. Velez. This exemption allows the elimination of the liquid seal requirement for a vapor destruction device without the use anti-flashback burners. Reference 33 CFR 154.2109(b)(3)(i). Additional safety devices are required as a condition of this exemption and those safety devices were inspected and tested during the site inspection on March 15, 2022. A copy of this exemption is included with this letter as Enclosure 4 for reference.

REQUIREMENTS:

(Per 33 CFR 154.2025)

- (a) *A report of the tests conducted during the certification process:*

A copy of the report outlining all checks and tests performed during the Certification Process may be found in Enclosure 2 of this letter. All checks and tests are initialed and dated.

- (b) *A list of all plans that were reviewed by the certifying entity:*

Enclosure #3 lists all plans and documents that were reviewed by WN.

- (c) *Any exemptions to the regulations approved by the Commandant (G-MTH) or other USCG correspondence regarding the operation of this MVCS:*

Enclosure 4 includes the exemption letter(s) and relevant correspondence.

- (d) *A reference to the Coast Guard letter authorizing the certifying entity to serve in that capacity:*

Warner Nicholson Consultants, PLLC was authorized to be a U.S. Coast Guard Certifying Entity by a letter dated October 26, 1998 from Commander R.F. Corbin of the USCG and updated in a letter dated February 12, 2020 from Commander M. J. Montemerlo. Enclosure 5

- (e) *A list of all cargoes that have been approved by the certifying entity for vapor control:*
The product loaded from the dock facility into the marine vessels can be found in the MVCS Certification Summary - Authorized Cargoes, Enclosure 1.

- (f) *An indication whether the facility is certified to collect vapors from tank barges that are required to have shoreside explosion proof receptacles or an overfill control panel under 33 CFR 154.2102 (a) and (b):*

The facility is equipped with a shoreside overfill control panel. The facility can collect vapors from marine vessels that are equipped with overfill protection systems under 46 CFR 39.20-9 (b).

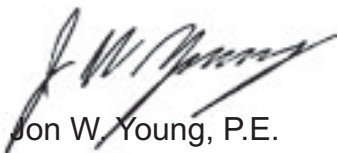


If further information or clarification is required for any of the responses made by WN to the requirements of the U.S. Coast Guard Certifying Entity Guidelines, referenced above, please contact WN, we will be pleased to respond to your request.

If you have any questions, please do not hesitate to contact us by email or telephone.

Sincerely,

Warner Nicholson Consultants, PLLC



Jon W. Young, P.E.
Principal Engineer

Enclosures:

1. MVCS Certification Summary Page – 1 Page.
2. WN USCG Certification Checklist - MVCS Requirements – 19 Pages.
3. WN USCG Certification Checklist - Documentation Requirements – 1 Page.
4. USCG Exemption Letter – 12 Pages.
5. WN Letter of Acceptance as a CE – 1 Page.
6. P&IDs – 3 Pages.
7. General Equipment Arrangement Drawings – 7 Pages.
8. Specification Sheets for selected major equipment items – 7 Pages.

Electronic Copies: CG-ENG-5, USCG Hazardous Materials Div., Washington D.C.
MSU Port Arthur



WARNER NICHOLSON CONSULTANTS, PLLC

Enclosure 1
MVCS Summary Page

MVCS CERTIFICATION SUMMARY PAGE

Facility Name: **Martin Midstream LP; Stanolind Cut Terminal (PATMS115)**
Location: **Beaumont, Texas**
USCG: **MSU Port Arthur**
Certifying Entity: **Warner Nicholson Consultants, PLLC**
C.E. Contacts: **Jon W. Young, P.E.**

Certification Completion Date: **April 22, 2022**

FACILITY DETAIL

Dock Name: **Marine Dock**
Number of Berths: **One**
Vapor Connections: **1**

SYSTEM DETAILS

Method MVCS: **Vapor Combustor**
Type of Loading: **Non-Inert**
Manufacturer: **Jordan**
Vapor Conditioning: **Enrichment**
Vapor Mover: **Centrifugal Blower**

VESSEL OVERFILL PROTECTION

Ex. P receptacle: **n/a**
Overfill Control Panel: **Yes**

FIRE, EXP. & DETONATION PROTECTION

Vapor Analyzers

Num. O₂ analyzers: **2**

Num. HC analyzers: **0**

Detonation Arrestors

Num. of DA's: **2**

DA Type: **II**

MESG: **0.90 mm**

Flame Arrestors

Num. FA's: **0**

Approval: **N/A**

VESSEL OVERPRESS & VAC. PROTECTION

Pressure Relief Valves: **Yes**
Vacuum Relief Valves: **Yes**

GENERAL CARGO DATA

High Flash Point Cargo: **No**
High Freeze Point Cargo: **No**
Polymerizing Cargo: **No**

AUTHORIZED CARGOES:

Product	CHRIS Name	CHRIS Code	Max. Combined Non-Inert Transfer Rate (bph)
Crude Oil	Oils: Crude	OIL	3,000

EXEMPTIONS:

<u>Letter Date</u>	<u>Exemption</u>	<u>Description</u>
February 17, 2022	Liquid Seal Exemption	Requires the addition of multiple safety features for the removal of a liquid seal and the use of non-anti-flashback burner elements.



WARNER NICHOLSON CONSULTANTS, PLLC

Enclosure 2
WN Equipment Checklist

Functional Test Log to Comply with §154.2022(c)

Dock Safety Skid

Instrument ID	Description	Set Point	Units	Failsafe	Date	Initials
LAH-200	Vessel High Level Alarm	Fixed	n/a	Yes / No ✓	3/15/22	W
LAHH-200	Vessel High Level S/D	Fixed	n/a	Yes / No ✓	3/15	W
PAH-202	Vessel High Press Alarm	24.15	"w.c.	Yes / No ✓	3/15	W
PAL-202	Vessel Low Press Alarm	-8	"w.c.	Yes / No ✓	3/15	W
PAHH-201	Vessel High Press S/D	28.22	"w.c.	Yes / No ✓	3/15	W
PALL-201	Vessel Low Press S/D	-10	"w.c.	Yes / No ✓	3/15	W
ZSL-201	XV-201 Fail to Close OPEN	n/a	n/a	n/a ✓	3/15	W
PALL-203	Reverse Flow S/D	-0.5	"w.c.	Yes / No ✓	3/15	W
PAH-203	High DA Press Drop Alarm	15	"w.c.	n/a ✓	3/15	W
ESD-201	Panel Emergency S/D	n/a	n/a	Yes / No ✓	3/15	W
TSHH-202	High DA Temp S/D Outlet	250	deg. F	Yes / No ✓	3/15	W
PAH-101	High Pressure Alarm	20	psig	n/a X	ONT	
PAL-101	Low Pressure Alarm	10	psig	n/a ✓	3/15	W
AAH-201/2	High Oxygen Alarm (non-inert)	15.5	% O2	Yes / No ✓	3/15	W
AAHH-251/25	High Oxygen S/D (non-inert)	16.5	% O2	Yes / No ✓	3/15	W
FALL-251	Analyzer Low Flow Alarm-S/D	n/a	n/a	n/a ?	4/22	W
FALL-252	Analyzer Low Flow Alarm-S/D	n/a	n/a	n/a ?	4/22	W
AL-201	Amber Alarm Lamp	n/a	n/a	n/a	ONLY ONE LAMP	
AL-202	Red Alarm Lamp	n/a	n/a	n/a ✓	3/15	W
HN-201	Audible Alarm Horn	n/a	n/a	n/a ✓	3/15	W
	HAND VALVE 350					
	4" x 8" Pipe V. KN AT 50' FLOW ON - CORRECTED ~ 60' NOW					
FVC Labeled correctly	NO/NT		Yes/No	YES/NO	3/17	W
Insulation Flange Installed			Yes/No		3/17	W
0.5" pin on FVC flange			Yes/No		3/15	W
Heat Sources near Vapor Pipe			Yes/No		3/15	W
Skid-grounded:			Yes/No		3/15	W
Accommodations for Condensate Removal			Yes/No		3/17	W
Vapor piping grounded and continuous			Yes/No		3/17	W
Description	Measured	Units	Notes			
Vacuum Test (max blower speed)	15	"w.c.	must maintain pressure below 28" wc			
Distance from FVC to DSU DA	20	ft.	must be less than 59.1' no exemption			
Distance from FVC to GIP	22	ft.	must be less than 72.2' no exemption			
Distance from GIP point to analyzer sample	OK	ft	must be w/in 30 PD (30 PD of 10" = 25')			
Analyzer Sample Response Time	35	sec.	req'd response = 95% in 60 seconds			
Cargo Valve Closure Time	10	sec.	must be 30 seconds or less			
Vapor Valve Closure Time	10	sec.	must be 30 seconds or less			

Vapor Blower Skid & VCU

[illegible]

REQUIRED BY EXEMPTION

LOW POINT UNDERGROUND
BXT ROCK & VCV → PROCEDURES
IN MANUAL
NANTIN TO PROVIDE PROCEDURES TO EMPT & LOW PT.
WRITTEN COMPLETES - OK

Martin Midstream
Certification Checklist

Beaumont, TX

§ 154.2030	Personnel - Transfer facilities.	Notes	Date	Initial
(a)	Personnel in charge of a transfer operation using a vapor control system (VCS) must have completed a training program covering the particular VCS installed at the facility. As part of the training program, personnel must be able to demonstrate, through drills and display of practical knowledge, the proper VCS operational procedures for normal and emergency conditions. The training program must cover the following subjects:	2 TRAINING SESSIONS BY R. MARTIN & D. KAISER	3/17/22	
-(1)	Purpose of the VCS;	ATTENDEE LIST		
-(2)	Principles of the VCS;	IN WH FILES		
-(3)	Components of the VCS;			
-(4)	Hazards associated with the VCS;			
-(5)	Coast Guard regulations in this subpart;			
-(6)	Operating procedures, including:			
--(i)	Transfer, testing, and inspection requirements;			
--(ii)	Pre-transfer procedures;			
--(iii)	Chemicals approved for collection;			
--(iv)	Material safety data sheet review;			
--(v)	Connection procedures;			
--(vi)	Startup procedures;			
--(vii)	Normal operating conditions and how to handle deviations from normal conditions;			
--(viii)	Normal shutdown procedures; and			
--(ix)	Operating procedures for cargo line clearing if a cargo line clearance system is installed in accordance with 33 CFR 154.2104; and			
-(7)	Emergency procedures.			
(b)	Personnel overseeing VCS maintenance must be familiar with—			
-(1)	Inspection of detonation arresters; and			
-(2)	Procedures for equipment and instrumentation testing required by 33 CFR 156.170(g).			
(c)	Facility personnel in charge of a transfer operation using a VCS must be designated and qualified in compliance with 33 CFR 154.710 and the facility must maintain the training documentation required by 33 CFR 154.740(b).			

Martin Midstream
Certification Checklist

Beaumont, TX

§ 154.2100	Vapor control system, general.	Notes	Date	Initial
(a)	Vapor control system (VCS) design and installation must eliminate potential overpressure and vacuum hazards, overfill hazards, sources of ignition, and mechanical damage to the maximum practicable extent. Each remaining hazard source that is not eliminated must be specifically addressed in the protection system design and system operational requirements.	TL TL-OK	4/22/22	rw
(b)	Vapor collection system pipe and fitting components must be in accordance with ANSI B31.3 with a maximum allowable working pressure (MAWP) of at least 150 psig. Valves must be in accordance with ASME B16.34, 150 pound class. Flanges must be in accordance with ANSI B16.5 or ANSI B16.24, 150 pound class.	SITE INSPECTED OK	3/17/22	rw
(b1)	The following components and their associated equipment do not have a minimum specified MAWP, but must be constructed to acceptable engineering standards and have the appropriate mechanical strength to serve the intended purpose: knockout drums, liquid seals, blowers/compressors, flare stacks/incinerators, and other vapor processing units.	OK	3/17	rw
(c)	All VCS electrical equipment must comply with NFPA 70 (2011)	OK	3/17	rw
(d)	Any pressure, flow, or concentration indication required by this part must provide a remote indicator on the facility where the cargo transfer system and VCS are controlled, unless the local indicator is clearly visible and readable from the operator's normal position at the control stations.	AT HMI ATCP DOCK & VCU	3/17	rw
(e)	Any condition requiring an alarm as specified in this part must activate an audible and visible alarm where the cargo transfer and VCSs are controlled.	confirmed	3/17	rw
(f)	For a VCS installed after August 15, 2013, an alarm or shutdown must be activated if electrical continuity of an alarm or shutdown sensor required by this subpart is lost.	confirmed	3/17	rw
(g)	The VCS piping surface temperature must not exceed 177°C (350 °F) or 70 percent of the auto-ignition temperature in degrees Celsius of the vapors being transferred, whichever is lower, during normal operations. This must be achieved by either separating or insulating the entire VCS from external heat sources.	NO HOT SURFACES, STEAM LINES INSULATED	3/17	rw
(h)	The VCS must be equipped with a mechanism to eliminate any liquid condensate LOW PT NEEDS PROCEDURE	KO DRUM AT BLOWER SUBSTATION	3/17	rw
-(1)	If a liquid knockout vessel is installed to eliminate any liquid condensate, it must have—	APPLICABLE	3/17	rw
--(i)	A mechanism to indicate the level of liquid in the device;	LG - 401	3/17	rw
--(ii)	A high liquid level sensor that activates an alarm, meeting the requirements of paragraph (e) of this section;	LSH - 401	3/17	rw

§ 154.2100	Vapor control system, general.	Notes	Date	Initial
--(iii)	A high-high liquid level sensor that closes the remotely operated cargo vapor shutoff valve required by 33 CFR 154.2101(a), and shuts down any vapor-moving devices before carrying liquid over from the vessel to the vapor-moving device. One sensor with two stages may accomplish both this requirement and the requirement of paragraph (h)(1)(ii) of this section	LSH/H-401 1	3/17/22	W
-(2)	If a drip leg is used to eliminate any liquid condensate, it must be fitted with a mechanism to remove liquid from the low point.	NO DL 2	3/17	W
(i)	Vapor collection piping must be electrically grounded and must be electrically continuous.	Yes 2	3/17	W
(j)	If the facility handles inerted vapors of cargoes containing sulfur, the facility must control heating from pyrophoric iron sulfide deposits in the vapor collection line.	ALL NON-INERT 1	3/17	W
(k)	All VCS equipment and components, including piping, hoses, valves, flanges, fittings, and gaskets, must be suitable for use with the vapor in the VCS.	OK 2	3/17	W

Martin Midstream
Certification Checklist

Beaumont, TX

§154.2101	Requirements for facility vapor connections.	Notes	Date	Initial
(a)	A remotely operated cargo vapor shutoff valve must be installed in the vapor collection line between the facility vapor connection and the nearest point where any inerting, enriching, or diluting gas is introduced into the vapor collection line, or where a detonation arrester is fitted. The valve must—	Yes	3/17/22	W
-(1)	Close within 30 seconds after detection of a shutdown condition of any component required by this subpart;	~ 10 SEC.	3/17	W
-(2)	Close automatically if the control signal or electrical power to the system is interrupted;	FC-SPRINGS	3/17	W
-(3)	Activate an alarm meeting 33 CFR 154.2100(e) when a signal to shut down is received from a component;	CONFIRMED	3/17	W
-(4)	Be capable of manual operation or manual activation;	ESD	3/17	W
-(5)	Have a local valve position indicator, or be designed so that the valve position can be readily determined from the valve handle or valve stem position; and	ON TOP OF ACTIVATION	3/17	W
-(6)	If the valve seat is fitted with resilient material, be a Category A valve as defined by 46 CFR 56.20-15 and not allow appreciable leakage when the resilient material is damaged or destroyed.	BRAY VALVE TRIP COCK - 468 - FS	3/17	W
(b)	Except when a vapor collection arm is used, the first 1 meter (3.3 feet) of vapor piping downstream of the facility vapor connection must be—	Yes	3/17	W
-(1)	Painted in the sequence of red/ yellow/red. The width of the red bands must be 0.1 meter (0.33 foot) and the width of the middle yellow band must be 0.8 meter (2.64 feet); and	Yes VAPOR 40000	3/17	W
-(2)	Labeled with the word "VAPOR" painted in black letters at least 50.8 millimeters (2 inches) high.	Yes	3/17	W
(c)	Each facility vapor connection flange face must have a permanent stud projecting outward that is 12.7 millimeters (0.5 inch) in diameter and is at least 25.4 millimeters (1 inch) long. The stud must be located at the top of the flange face, midway between boltholes, and in line with the bolthole pattern.	Yes	3/17	W
(d)	Each hose that transfers vapors must—			
-(1)	Have a design burst pressure of at least 25 pounds per square inch gauge (psig);	OK CONFIRMED	3/17	W
-(2)	Have a maximum allowable working pressure no less than 5 psig;	"	3/17	W
-(3)	Be capable of withstanding at least a 2 pounds per square inch (psi) vacuum without collapsing or constricting;	"	3/17	W
-(4)	Be electrically continuous with a maximum resistance of 10,000 ohms;	Yes	3/17	W
-(5)	Have flanges with—			
--(i)	A bolthole arrangement complying with the requirements for 150 pound class flanges, ANSI B16.5	Yes	3/17	W

Martin Midstream
Certification Checklist

Beaumont, TX

§154.2101	Requirements for facility vapor connections.	Notes	Date	Initial
--(ii)	One or more 15.9 millimeter (0.625 inch) diameter holes in the flange face, located midway between boltholes, and in line with the bolthole pattern;	OK	3/17/22	W
-(6)	Be resistant to abrasion and kinking;	OK	3/17/22	W
-(7)	Be compatible with vapors being controlled; and	YES	3/17	W
-(8)	Have the last 1 meter (3.3 feet) of each end of the vapor hose marked in accordance with paragraph (b) of this section.	WHOLE HOSE	3/17	W
(e)	Vapor hoses must be adequately supported to prevent kinking, collapse, or contact with any metal of the vessel or facility to prevent unintentional electrical bypassing of the insulating flange or the single length of non-conducting hose required by paragraph (g) of this section.	ON DOCK	3/17	W
(g)	The facility vapor connection must be electrically insulated from the vessel vapor connection in accordance with OCIMF ISGOTT section 17.5. In order to prevent electrical arcing during connection and disconnection of the transfer hose/arm, the transfer hose/arm must be fitted with an insulating flange or a single length of non-conducting hose to ensure electrical discontinuity between the vessel and facility. The insulating flange/hose should be inserted at the jetty end and must not be electrically bypassed. The installation, inspection, and testing of the insulating flange/hose must be in accordance with 46 CFR 35.35-4. For each vapor hose, only one insulating flange or non-conductive hose must be provided. See 46 CFR 35.35-4.	KIT INSTALLED	3/17	W
(h)	A vapor collection system, fitted with a gas injection system that operates at a positive gauge pressure at the facility vapor connection, must be fitted with a means to prevent backflow of vapor to the vessel's vapor collection system during loading.	CONFIRMED PDIT-209	3/17	W
(i)	Electrical bonding between vessel and shore must be in accordance with 46 CFR 35.35-5.	YES	3/17	W

Martin Midstream
Certification Checklist

Beaumont, TX

§ 154.2102	Facility requirements for vessel liquid overfill protection.	Notes	Date	Initial
(b)	Each facility that receives cargo vapor from a tank barge that is fitted with an intrinsically safe cargo tank level sensor system complying with 46 CFR 39.2009(a)(2), as a means of overfill protection, must have an overfill control system on the dock capable of powering and receiving an alarm and shutdown signal from the cargo tank level sensor system that--	APPLICABLE	3/17/22	W
-(1)	Closes the remotely operated cargo vapor shutoff valve required by 33 CFR 154.2101(a) and activates the emergency shutdown system required by 33 CFR 154.550 when--	confirmed	3/17	W
--(i)	A tank overfill signal is received from the barge; or	confirmed	3/17	W
--(ii)	Electrical continuity of the cargo tank level sensor system is interrupted;	confirmed	3/17	W
-(2)	Activates an audible and visible alarm that warns barge and facility personnel when a tank overfill signal, or an optional high-level signal corresponding to a liquid level lower than the tank overfill sensor setting, is received from the barge;	Yes	3/17	W
-(3)	Has a mechanism to test the alarms and automatic shutdown systems electrically and mechanically before operating the vapor control system (VCS);	Test SWITCH	3/17	W
-(4)	Has suitable means, such as approved intrinsic safety barriers able to accept passive devices, so that the overfill and optional alarm circuits on the barge side of the overfill control system, including cabling, normally closed switches, and pin and sleeve connectors, are intrinsically safe;	confirmed IS CIRCUIT	3/17	W
-(5)	Is labeled at the dock with the maximum allowable inductance (in millihenrys) and capacitance (in microfarads) to be connected to the facility overfill protection system as specified by the equipment manufacturer; and	LABEL INSTALLED	3/17	W
-(6)	Has a female connecting plug for the tank barge level sensor system with a five-wire, 16-ampere connector body meeting IEC 60309-1 and IEC 60309-2, that is--	confirmed	3/17	W
--(i)	Configured with pins S2 (N) and R1 (L3) for the tank overfill sensor circuit, pin G connected to the cabling shield, and pins N (L2) and T3 (L1) reserved for an optional high-level alarm connection;	Yes	3/17	W
--(ii)	Labeled "Connector for Barge Overfill Control System"; and	Yes	3/17	W
--(iii)	Connected to the overfill control system by a shielded flexible cable.	Yes	3/17	W

Martin Midstream
Certification Checklist

Beaumont, TX

§ 154.2103	Facility requirements for vessel vapor overpressure and vacuum protection.	Notes	Date	Initial
(a)	A facility's vapor control system (VCS) must have the capacity for collecting cargo vapor at a rate of not less than the facility's maximum liquid transfer rate for cargoes that are vapor controlled plus the vapor growth for the cargoes and any inerting, diluting, or enriching gas that may be added to the system.	TL TEST LOAD OK	4/22/22	m
(a1)	Vapor growth must be considered as 25 percent of the cargo's saturated vapor pressure in pounds per square inch absolute (psia) at 115 deg F, divided by 12.5 psia (the vapor pressure of gasoline at 115 deg F), times the facility's maximum liquid transfer rate, unless there is experimental data for actual vapor growth for turbulent transferring under the most severe conditions for vapor growth. If the cargo is transferred at temperatures above 115 deg. F, the cargo's true vapor pressure (in psia) at the transferring temperature must be used when determining the vapor growth.	IN CALC'S	3/17/22	m
(a2)	If the cargo is transferred at temperatures above 115 deg. F, the cargo's true vapor pressure (in psia) at the transferring temperature must be used when determining the vapor growth.	AMB	3/17/22	h
(b)	For <u>non-inert</u> - A facility VCS must be designed to prevent the pressure in a vessel's cargo tanks from going below 80 percent of the highest setting of any of the vessel's vacuum relief valves	8P CALC'S REVIEWED	3/17	h
(b1)	For <u>non-inert</u> - A facility VCS must be designed to prevent the pressure in a vessel's cargo tanks from exceeding 80 percent of the lowest setting of any of the vessel's pressure relief valves.	"	3/17	m
(b4)	The system must sustain the pressure in the vessel's cargo tanks within this range at any cargo transfer rate less than or equal to the maximum transfer rate determined at the pre-transfer conference.	TL confirmed	4/22/22	m
(c)	The pressure measured at the facility vapor connection must be corrected for pressure drops across the vessel's vapor collection system, vapor collection hose or arm, and vapor line up to the location of the pressure sensor.	24 hr check	3/17	m
(d)	High Pressure Alarm - The facility vapor connection must have a pressure-sensing device which activates an alarm when the pressure at the facility vapor connection exceeds either-- (1) The pressure corresponding to the upper pressure determined in paragraph (b) of this section; or (2) A lower pressure agreed upon at the pre-transfer conference.	PSH-202	3/17	h
(e)	Low Pressure Alarm - If a facility draws vapor from a vessel with a <u>vapor-moving</u> device, the facility vapor connection must have a pressure-sensing device, which activates an alarm when the pressure at the facility vapor connection falls below either-- (1) The pressure corresponding to the lower pressure determined in paragraph (b) of this section; or (2) A higher pressure agreed upon at the pre-transfer conference.	PSL-202	3/17	m

Martin Midstream
Certification Checklist

Beaumont, TX

§ 154.2103	Facility requirements for vessel vapor overpressure and vacuum protection.	Notes	Date	Initial
(f)	High Pressure S/D - The facility vapor connection must have a pressure-sensing device, independent of the device used to activate the alarm required by paragraph (d), which activates the emergency shutdown system required by 33 CFR 154.550 when the pressure at the facility vapor connection exceeds the <u>lower</u> of the following: (1) A pressure corresponding to 90 percent of the vessel's lowest pressure relief valve setting, corrected for pressure drops across the vessel's vapor collection system, the vapor collection hose or arm, and any vapor line up to the point where the pressure sensor is located; (2) A pressure corresponding to 90 percent of the setting of the pressure relief valve at the facility vapor connection, if the facility vapor connection is installed with a pressure relief valve; or (3) A lower pressure than the pressure in paragraphs (f)(1) and (f)(2) of this section that is agreed upon at the pre-transfer conference.	PSHH-201	3/17/22	M
(g)	Low Pressure S/D - If a facility draws vapors from a vessel with a <u>vapor-moving device</u>, the facility vapor connection must have a pressure-sensing device, independent of the device used to activate the alarm required by paragraph (e) of this section, which closes the remotely operated cargo vapor shutoff valve required by 33 CFR 154.2101(a) when the vacuum at the facility vapor connection is more than the higher (lesser vacuum) of the following: (1) A vacuum corresponding to 90 percent of the vessel's highest vacuum relief valve setting; (2) A vacuum corresponding to 90 percent of the setting of the vacuum relief valve at the facility vapor connection, if the facility vapor connection is installed with a vacuum relief valve; or (3) A lesser vacuum than the vacuum in paragraphs (g)(1) and (g)(2) of this section that is agreed upon at the pre-transfer conference.	PSLL-201	3/17/22	M
(h)	The pressure-sensing devices required by paragraphs (d) and (f) of this section must be located in the vapor collection line between the facility vapor connection and the following: (1) Any isolation valve, unless an interlock is provided that prevents operation of the system when the isolation valve is closed; and (2) Any components that could plug and cause a blockage in the vapor line.	HOV-201 HPS 250-201 TO CONFIRM OPEN	3/17/22	M

Martin Midstream
Certification Checklist

Beaumont, TX

§ 154.2103	Facility requirements for vessel vapor overpressure and vacuum protection.	Notes	Date	Initial
(i)	A pressure-indicating device must be provided that displays the pressure in the vapor collection line between the facility vapor connection and any isolation valve or any devices which could cause a blockage in the vapor line.	PIT-201 -202	3/17/22	m
(j)	If a facility draws vapor from the vessel with a <u>vapor-moving device</u> capable of drawing more than 1 psi vacuum, a vacuum relief valve must be installed in the vapor collection line between the vapor-moving device and the facility vapor connection, which	PVV-201	3/17	m
-(1)	Relieves at a predetermined pressure such that the pressure at the facility vapor connection is maintained at -1.0 psig (1.0 psig vacuum) or less vacuum;	ON CALC'S TESTED AT -1.5" H ₂ O	3/17	m
-(2)	Has a relieving capacity equal to or greater than the capacity of the vapor-moving device;	confirmed	3/17	m
-(3)	Has a flame arrester or flame screen fitted at the vacuum relief opening; and	FS ✓	3/17	m
-(4)	Has been tested for relieving capacity in accordance with paragraph 1.5.1.3 of API 2000 (incorporated by reference, see 33 CFR 154.106) with a flame arrester or flame screen fitted.	ON CURVE	3/17	m
(l)	If the pressure in the vapor collection system can exceed 1.5 psig during a malfunction of a pressure regulator or control valve in an inerting, enriching, or diluting system, a pressure relief valve must be located between where the inerting, enriching, or diluting gas is introduced into the vapor collection system and the facility vapor connection;	APPLICABLE	3/17	m
-(1)				
-(2)	Relieve at (or below) the higher of the following two pressures: (i) A pressure such that the pressure at the facility vapor connection does not exceed 1.5 psig; or (ii) The lowest pressure relief valve setting of vessels that control vapors at the facility;	PVV-201	3/17	m
-(3)	Have a relieving capacity equal to or greater than the maximum capacity of the facility inerting, enriching, or diluting gas source flowing through the failed pressure regulator or control valve, taking into account the pressure drops across any flame arrester or discharge piping fitted at the relief valve's discharge;	ON CALC'S	3/17	m
-(4)	Have a flame arrester or flame screen fitted at the discharge opening, if the design does not secure a minimum vapor discharge velocity of 30 meters (98.4 feet) per second; and	YES	3/17	m
-(5)	Have been tested for relieving capacity in accordance with paragraph 1.5.1.3 of API 2000.	ON CURVE	3/17	m
(m)	The relieving capacity test required by paragraph (l)(5) of this section must be carried out with a flame screen fitted at the discharge opening if--	"	3/17	m

§ 154.2103	Facility requirements for vessel vapor overpressure and vacuum protection.	Notes	Date	Initial
-(1)	The design of the pressure relief valve does not secure a minimum vapor discharge velocity of 30 meters (98.4 feet) per second; and	NOT APPLIC	3/17/22	W
-(2)	The discharge is not fitted with a flame arrester.			

§ 154.2105	Fire, explosion, and detonation protection.	Notes	Date	Initial
(d) -(1)	A VCS with a single facility vapor connection that receives vapor from a vessel with cargo tanks that are not inerted or are partially inerted, and processes the vapor with a vapor destruction unit must-- Have a detonation arrester located as close as practicable to the facility vapor connection. The total pipe length between the detonation arrester and the facility vapor connection must not exceed 18 meters (59.1 feet) and the vapor piping between the detonation arrester and the facility vapor connection must be protected from any potential internal or external ignition source; and	~ 20 ft OK	3/17/22	W
-(2)	Have an inerting, enriching, or diluting system that satisfies the requirements of 33 CFR 154.2107.	Yes ENRICHMENT	3/17/22	W

Martin Midstream
Certification Checklist

Beaumont, TX

§ 154.2106	Detonation arresters installation.	Notes	Date	Initial
(a)	Detonation arresters must be installed in accordance with the guidelines outlined in the arrester manufacturer's acceptance letter provided by the Coast Guard.	OK	3/17/22	W
(b)	On either side of a detonation arrester, line size expansions must be in a straight pipe run and must be no closer than 120 times the pipe's diameter from the detonation arrester unless the manufacturer has test data to show the expansion can be closer.	PIPE EXPANSION RELOCATED FROM ~12' TO 750' 40 FT REQ'D	3/17/22	W

§ 154.2107	Inerting, enriching, and diluting systems.	Notes	Date	Initial
(a)	Before receiving cargo vapor, a vapor control system (VCS) that uses a gas for inerting, enriching, or diluting must be capable of inerting, enriching, or diluting the vapor collection system, at a minimum of two system volume exchanges of inerting, enriching, or diluting gas, downstream of the injection point.	AT START UP	3/17/22	W
(b)	A VCS that uses an inerting, enriching, or diluting system must be equipped, except as permitted by 33 CFR 154.2105(a), with a gas injection and mixing arrangement located as close as practicable to the facility vapor connection and no closer than 10 meters (32.8 feet) upstream from the vapor processing unit or the vapor-moving device that is not protected by a detonation arrester required by 33 CFR 154.2108(b). The total pipe length between the arrangement and the facility vapor connection must not exceed 22 meters (72.2 feet). The arrangement must be such that it provides complete mixing of the gases within 20 pipe diameters of the injection point. The vapor piping between the arrangement and the facility vapor connection must be protected from any potential internal or external ignition source.	710 feet 500 feet END ~ 22 ft FROM FVC	3/17	W
(c)	A VCS that uses an inerting or enriching system may not be operated at a vacuum after the injection point unless—	APPLICABLE	3/17	W
-(1)	There are no vacuum relief valves or other devices that could allow air into the vapor collection system downstream of the injection point, and pipe connections are flanged, threaded, or welded so no air can leak into the VCS; or	confirmed	3/17	W
-(2)	An additional analyzer is used to monitor the vapor concentration downstream of such device and a mechanism is provided to inject additional inerting or enriching gas.	N/A	3/17	W
(d)	A VCS that uses analyzers to control the amount of inerting, enriching, or diluting gas injected into the vapor collection line must be equipped with at least two analyzers. The analyzers must be connected so that—	confirmed x2	3/17	W
-(1)	When two oxygen analyzers are used, the higher oxygen concentration reading controls the inerting or enriching system and activates the alarm and automatic shutdown system required by paragraph (h), (j), or (k)(2) of this section;	confirmed	3/17	W
(f)	Each oxygen or hydrocarbon analyzer required by this section must—	OK	3/17	W
-(1)	Be installed in accordance with API 550 (incorporated by reference, see 33 CFR 154.106);			
-(2)	Have a system response time of not more than one minute from sample input to 95 percent of final stable value as tested per 33 CFR 154.2180 and 33 CFR 154.2181; and	~ 35 sec	3/17	W
-(3)	Continuously sample the vapor concentration not more than 30 pipe diameters from the gas injection point.	OK	3/17	W

Close BUT
W/ MIXER

§ 154.2107	Inerting, enriching, and diluting systems.	Notes	Date	Initial
(g)	A VCS must not use oxygen analyzers that operate at elevated temperatures (i.e., zirconia oxide or thermomagnetic).	FUEL CELL 1.1 PR	3/17	m
(i) -(1)	An enriching system must— Supply sufficient compatible hydrocarbon vapor to the vapor stream to make sure that the total flammable concentration downstream of the injection point is maintained either at or above 170 percent by volume of the upper flammable limit or above the upper flammable limit plus 10 percentage points, whichever is lower;	FL TEST LOAD CONFIRMED 1.2	4/22	h
-(2)	Activate an alarm that satisfies the requirements of 33 CFR 154.2100(e) when the total flammable concentration in the vapor collection line either falls below 170 percent by volume of the upper flammable limit or below the upper flammable limit plus 10 percentage points, whichever is lower;	CONFIRMED 2	3/17	m
-(3)	Close the remotely operated cargo vapor shutoff valve required by 33 CFR 154.2101(a) when the total flammable concentration in the vapor collection line either falls below 150 percent by volume of the upper flammable limit or below the upper flammable limit plus 7.5 percentage points, whichever is lower; and	CONFIRMED 2	3/17	m
-(4)	Have an upper flammable limit listed in paragraphs (i)(1), (i)(2), and (i)(3) of this section which is either the cargo's upper flammable limit or the enriching gas's upper flammable limit, whichever is higher. Alternatively, the mixture's upper flammable limit, which may be determined by using methods found in Coast Guard guidance available at http://homeport.uscg.mil , may be used.	NAT GAS USED FOR SP. 1	3/17	m
(j) -(1)	Oxygen analyzers may be used instead of hydrocarbon analyzers in a VCS using an enriching system that receives cargo vapor only from a vessel with non-inerted cargo tanks, providing that the analyzers— Activate an alarm satisfying the requirements of 33 CFR 154.2100(e) when the oxygen concentration in the vapor collection line exceeds a level corresponding to either a total flammable concentration of 170 percent by volume of the upper flammable limit or the upper flammable limit plus 10 percentage points, whichever yields a higher oxygen concentration;	APPLICABLE 2	3/17	h
-(2)	Close the remotely operated cargo vapor shutoff valve required by 33 CFR 154.2101(a) when the oxygen concentration in the vapor collection line exceeds a level corresponding to either a total flammable concentration of 150 percent by volume of the upper flammable limit or the upper flammable limit plus 7.5 percentage points, whichever yields a higher oxygen concentration;	CONFIRMED 2	3/17	m

§ 154.2107	Inerting, enriching, and diluting systems.	Notes	Date	Initial
-(3)	Have an alarm value in paragraph (j)(1) of this section that is at least one percentage point less than the shutdown value in paragraph (j)(2) of this section. If the oxygen analyzers used to measure oxygen concentrations cannot accurately differentiate between the alarm value and the shutdown value, the alarm value must be lowered until the analyzers become operable; and	100% OK	3/17	W
-(4)	Have an upper flammable limit listed in paragraphs (j)(1) and (j)(2) of this section which is either the cargo's upper flammable limit or the enriching gas's upper flammable limit, whichever is higher. Alternatively, the mixture's upper flammable limit, which may be determined by using methods found in Coast Guard VCS guidance available at http://homeport.uscg.mil , may be used.	N/A	—	

Martin Midstream
Certification Checklist

Beaumont, TX

§ 154.2108	Vapor-moving devices.	Notes	Date	Initial
(a)	Paragraphs (b) and (e) of this section apply only to facilities collecting vapors of flammable, combustible, or non-high flash point liquid cargoes.	APPLICABLE ₁	3/17/22	M
(e)	If the vapor is handled by a centrifugal compressor, fan, or lobe blower in the vapor collection system, construction of the blades or housing must be one of the following:	APPLICABLE ₁	3/17	fw
-(1)	Blades or housing of nonmetallic construction;	N/A ₁	—	—
-(2)	Blades and housing of nonferrous material; AL/AL	APPLICABLE ₁	3/17	M
-(3)	Blades and housing of corrosion resistant steel;	N/A ₁	—	—
-(4)	Ferrous blades and housing with one-half inch or more design tip clearance;	N/A ₁	—	—
-(5)	Nonferrous blades and ferrous housing with one-half inch or more design tip clearance; or	N/A ₁	—	—
-(6)	Blades of aluminum or magnesium alloy and a ferrous housing with a nonferrous insert sleeve at the periphery of the impeller.	N/A ₁	—	—

Martin Midstream
Certification Checklist

Beaumont, TX

§ 154.2109	Vapor recovery and vapor destruction units.	Notes	Date	Initial
(b)	The inlet to a vapor <u>destruction</u> unit must—			
-(1)	Have a liquid seal that meets the requirements of paragraph (e) of this section, except as specified by paragraph (b)(3) of this section; and	SEE (b3) BELOW	3/17/22	W
-(2)	Have two quick-closing stop valves installed in the vapor line. One of them must be installed upstream of the detonation arrester required by paragraph (c)(2) of this section. The quick-closing stop valves must—	50V-620 -621	3/17	W
--(i)	Close within 30 seconds after detection of a condition that requires the closing of these two quick-closing stop valves by a control component required by this subpart for a vapor control system (VCS) with a vapor destruction unit;	~10sec	3/17	W
--(ii)	Close automatically if the control signal is lost;	FL	3/17	W
--(iii)	Have a local valve position indicator or be designed so that the valve position is readily determined from the valve handle or valve stem position; and	Yes	3/17	W
--(iv)	If the valve seat is fitted with resilient material, be a Category A valve as defined by 46 CFR 56.20-15 and not allow appreciable leakage when the resilient material is damaged or destroyed; and	BRAV -468 FS	3/17	W
-(3)	Instead of a liquid seal as required by paragraph (b)(1) of this section, have the following:	SEE EXEMPTIONS 2/17/22	3/17	W
--(i)	An anti-flashback burner accepted by the Commandant and installed at each burner within the vapor destruction unit; and			
--(ii)	A differential pressure sensor that activates the quick-closing stop valves as required by paragraph (b)(2) of this section upon sensing a reverse flow condition.	PDIT-621	3/17	W
(c)	A vapor <u>destruction</u> unit must—			
-(1)	Not be within 30 meters (98.8 feet) of any tank vessel berth or mooring at the facility;	~500ft	3/17	W
-(2)	Have a detonation arrester fitted in the inlet vapor line; and	DA-621	3/17	W
-(3)	Activate an alarm that satisfies the requirements of 33 CFR 154.2100(e) and shut down when a flame is detected on the detonation arrester.	confirmed	3/17	W
(d)	When a vapor <u>destruction</u> unit shuts down or has a flame-out condition, the vapor destruction unit control system must—			
-(1)	Activate and close the quick-closing stop valves required by paragraph (b)(2) of this section;	confirmed	3/17	W
-(2)	Close the remotely operated cargo vapor shutoff valve required by 33 CFR 154.2101(a); and	confirmed	3/17	W
-(3)	Automatically shut down any vapor-moving devices installed in the VCS.	confirmed	3/17	W



WARNER NICHOLSON CONSULTANTS, PLLC

Enclosure 3
WN Document Checklist

**Documents Reviewed for Certification
for requirement §154.2025(a)(3)**

Document Description	Submitted by	Notes	Date Reviewed	Reviewed By
Drawings				
P&IDs	JAC	OK	3/10/22	RV
General Arrangements	JAC	OK	3/10/22	RV
Electrical Schematics	—	—	—	—
Design Standards	JAC	OK	3/10/22	RV
Area Classification	6/10/22 INSP.	OK	3/10/22	RV
Calculations				
Pressure Drop	JAC	OK	3/10/22	RV
Pressure/Vacuum Relief	JAC	OK	3/10/22	RV
Growth Factor	1.25	CRUDE OIL	3/10/22	RV
Mass(Volume) Balance	JAC	OK	3/10	RV
Conditioning Gas	JAC	ENRICH	3/10/22	RV
Analyzer Setpoints	JAC	CRUDE OIL	3/10	RV
Purge Volume	JAC	AT STD	3/10	RV
Documents				
System Description	JAC	INCLUDED	3/10	RV
Design Basis	JAC	"	3/10	RV
Specification List	JAC	"	3/10	RV
Dock Ops Addendum	JAC	"	3/10	RV
PIC Training Outline	JAC	"	3/10	RV
Vapor Blower Details	JAC	"	3/10	RV
Interconnecting Piping	JAC + 6/10/22 INSP	"	3/10	RV
Failure Analysis	JAC	"	3/10	RV
Vapor Hose /Arm	6/10/22	HOSIE	3/10	RV
Cargo Data				
Polymerizing	JAC	NO ISSUES	3/10	RV
Water Soluble	JAC	" " "	3/10	RV
Compatability	JAC	CRUDE OIL ONLY	3/10	RV
Cargo Temperature	AMB	OK	3/10	RV
UFL and LFL	JAC	N.G.	3/10	RV
Freezing Point	N/A	N/A	3/10	RV
MESG	JAC	CO-N.G.	3/10	RV
Flash Point	LOW	CO.	3/10	RV
TVP at 115 °F	VARIABLES	VARIABLES	3/10	RV
MOCC	N.G.	N.G.	3/10	RV
Sulfur Content	NIL	—	3/10	RV



WARNER NICHOLSON CONSULTANTS, PLLC

Enclosure 4
USCG Exemption Letters



16703/2022-02-07T161914
February 17, 2022

Cimarron Energy
Attn: Mr. Brad Kaisner
Project Engineer
11025 Equity Drive, Suite 200
Houston, TX 77041

Subj: MARINE VAPOR CONTROL SYSTEM LIQUID SEAL EXEMPTION – MARTIN
MLP, BEAUMONT TX (PATMS115) RECONSIDERATION

Dear Mr. Kaisner:

This letter is in response to your letter, dated February 2, 2022, (Enclosure) which requested a reconsideration of our response (2021-09-24T201905) to your request for exemption from the requirement of Title 33, Code of Federal Regulations (CFR), Paragraph 154.2109(b)(1) for a marine vapor control system (VCS) to be owned and operated by Martin MLP in Beaumont, TX. This letter supercedes the letter 2021-09-24T201905.

Paragraph 33 CFR 154.2109(b)(1) requires an anti-flashback burner accepted by the Commandant to be installed at each burner within the vapor destruction unit (VDU) in lieu of a liquid seal at the inlet to a VDU.

The proposed anti-flashback burners that will be installed have not been independently tested using acceptable flame arrester standards, such as ASTM 1273 or UL 525.

Your request for an exemption from the requirement of 33 CFR 154.2109(b)(3)(i) is granted for the marine VCS located at Martin MLP in Beaumont TX, according to the following conditions:

1. The calculations for the exit velocity at the burner nozzle shall be verified by the Certifying Entity to ensure that the exit velocity is at least as high as declared in the Enclosure. The pressure of the inlet line shall be monitored, and the VCS shall shut down if the exit velocity at the burner nozzles drops below 80% of the calculated exit velocity.
2. A thermocouple shall be securely installed upstream of each anti-flashback burner element and shall be within ten feet, so that the temperature of the anti-flashback burners can be measured continuously throughout the entire VCS operation. The thermocouple will measure the temperature rise across the element to determine how effective the anti-flashback burner is in keeping the temperature of the incoming vapors well below its auto-ignition temperature and to provide an early detection of burner failure.

February 17, 2022

3. Any thermocouple penetration in the flare or vapor piping shall be sealed to prevent a flame from entering the VCS piping.
4. The thermocouple shall be set to activate the emergency shutdown system required by 33 CFR 154.550 and VCS shutdown systems required by 154.2109(d) when the temperature measured by the thermocouple rises above a shutdown set point. The set point shall be 300°F or less for cargoes with an auto-ignition temperature equal to or higher than 350°F, or it shall be 50°F lower than the auto-ignition temperature for cargoes with an auto-ignition temperature lower than 350°F. For cargoes with an unknown auto-ignition temperature, the flash point of the cargo should be used.
5. A differential pressure transmitter that activates the two quick-closing valves shall be installed across the detonation arrester in the flare inlet to prevent vapor backflow.
6. The purge cycle required by 33 CFR 154.2107(a) shall provide enough enriching gas downstream of the injection point such that the vapor collection line achieves a minimum of two-volume exchanges of enriching gas prior to receiving cargo vapor.

This exemption is granted only for the marine VCS operations at the Martin MLP in Beaumont. A copy of this exemption letter shall be incorporated into each copy of the facility operations manual. In addition, the facility operator shall ensure that a copy of this exemption letter is made part of the facility's VCS certification letter that is provided to the cognizant U.S. Coast Guard Captain of the Port. If you have any questions regarding this matter, please contact my staff at hazmatstandards@uscg.mil.

Sincerely,



D. VELEZ
Lieutenant Commander, U.S. Coast Guard
Chief, Hazardous Materials Division
By Direction

Enclosure: Cimarron Energy Letter Dated Feb 2, 2022

Copy: MSU Port Arthur



Hazardous Materials Division (CG-ENG-5)
United States Coast Guard
2703 Martin Luther King Jr. Ave. SE, Stop 7509, Washington, DC 20593-7509
ATTN: Cynthia A. Woodlock, Ph.D.

September 30, 2021

Subject: Cimarron Job #2010186, Martin MLP MVCU, Liquid Seal Exemption Request

Dear Cynthia A. Woodlock:

- Cimarron Energy, Inc. has designed a Marine Vapor Combustion Unit (MVCU) for Martin MLP in Beaumont, TX. **The USCG ID of this facility is PATMS115.** This location has the capability to load non-inert barges with Crude. The purpose of this letter is to request an exemption from the requirement of Title 33, Code of Federal Regulations (CFR), part 154.2109(b)(1) to install a liquid seal as part of the Vapor Control System (VCS).

Rationale for the exemption request

The attached drawings show the following safety provisions that replace the need for a liquid seal by achieving an equivalent level of safety that is provided by the requirement of 33 CFR 154.2109(b)(1):

1. The Vapor Control System is equipped with multi nozzle anti-flashback burners. Our anti-flashback burner system ensures that flashback cannot occur due to the exit velocity at the burner nozzle exceeding the flame speed of the air/gas mixture. In addition to maintaining minimum exit velocity the system will be equipped with a USCG approved detonation arrester with a downstream thermocouple and differential pressure transmitter.
2. The thermocouple will be set to activate the cargo vapor shutoff valve and VCS shutdown required by 33 CFR 154.2109(d) when the measured temperature rises above a shutdown set point.
3. The set point will be 250°F, or less for cargos with an auto-ignition temperature equal to or higher than 300°F, or will be 50°F lower than the auto-ignition temperature.
4. A Resistance Temperature Detector (RTD) is installed downstream of the detonation arrester to detect flash back. This RTD will activate the cargo vapor shutoff valve and VCS shutdown required by 33 CFR 154.2109(d) when its temperature measurement rises above the same shutdown set point as above.
5. All thermocouple penetrations will be properly sealed to prevent the possibility of a flame from entering the VCS piping.
6. A differential pressure transmitter will be installed around the detonation arrester to prevent vapor backflow. This transmitter will be set to activate the two quick-closing valves required by 33 CFR 154.2109(b)(2) when the pressure measured by the pressure transmitter drops below a shutdown set point, indicating reverse flow.

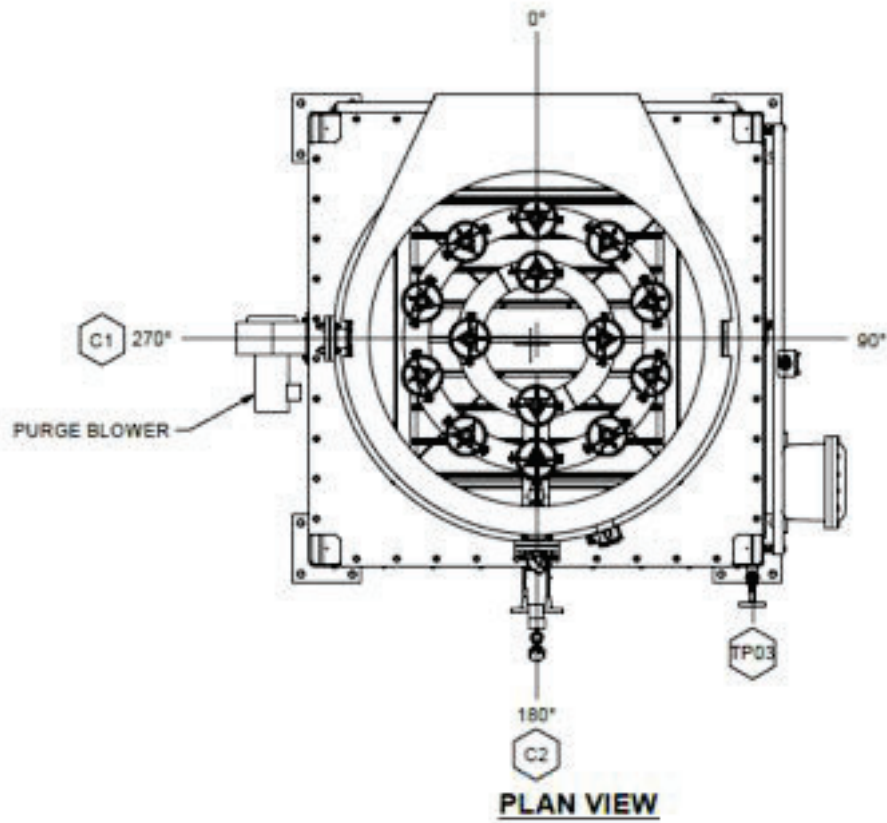
Please contact me if you have any questions or require additional information at (512) 466-7752 or by e-mail at bkaisner@cimarron.com.

A handwritten signature in black ink, appearing to read "Brad Kaisner".

Sincerely,
Brad Kaisner
Project Engineer
Cimarron Energy

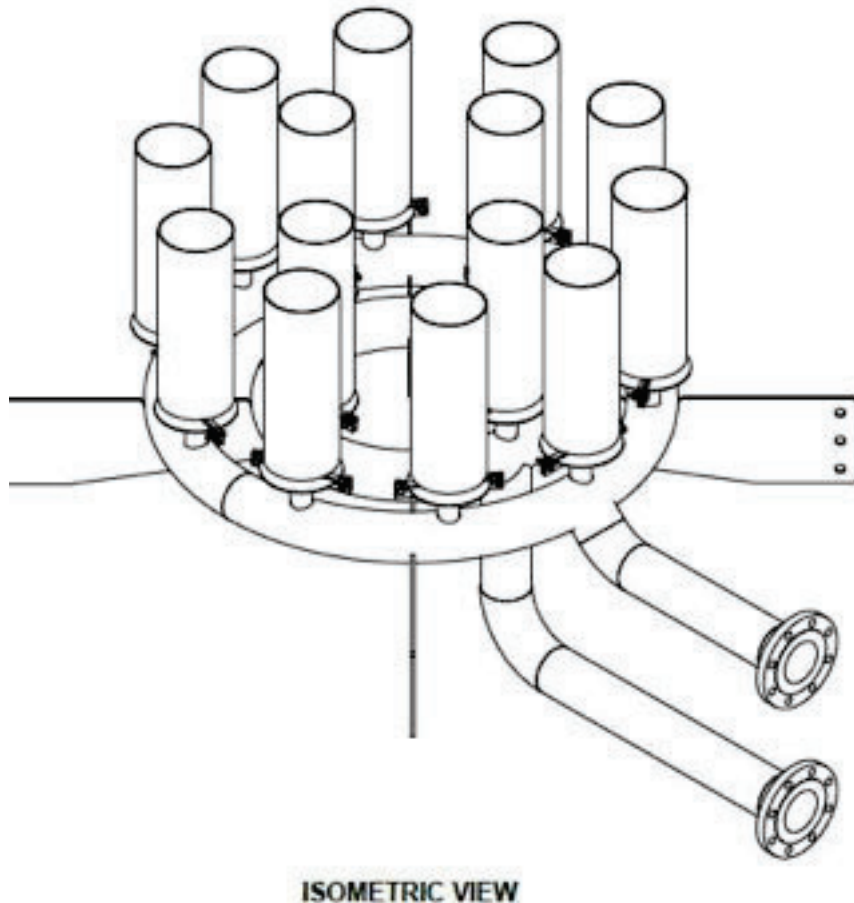


TYPICAL PLAN VIEW OF THE MVCU





2010186 Burner System

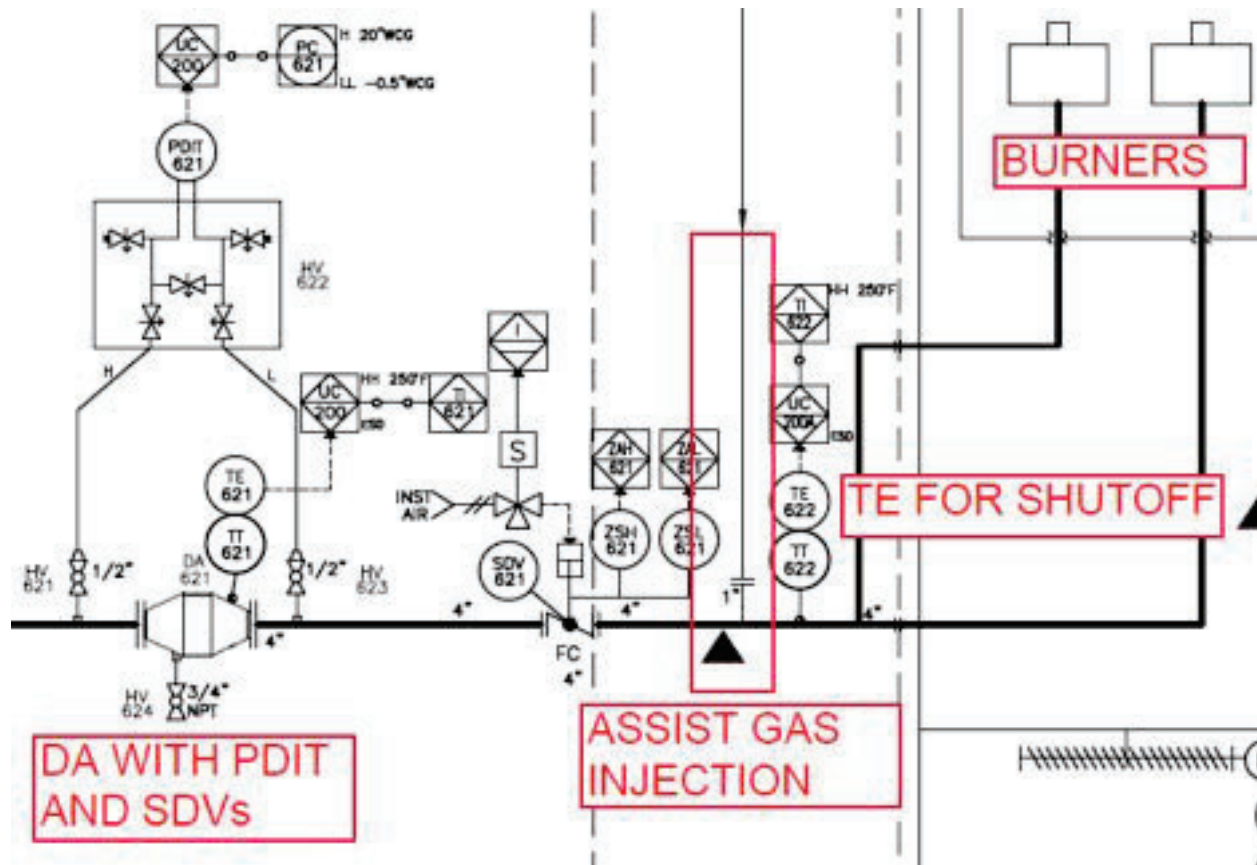


Provided burner system comprises of 14 nozzles and each nozzle will have qty (6) of 0.25" orifices. Antiflash back is being achieved based on the exit velocity of each orifice.

1. The burner will initiate when the system reaches 2 inches WC and at 2 inches WC the exit velocity of each orifice is 70 feet/sec for a gasoline/air mixture, and this is sufficiently higher than typical flame speeds for hydrocarbon/air mixtures (1.2 ft/sec to 3 ft/sec). System will shut off if the inlet pressure drops below 1/2-inch WC, which corresponds to 38 ft/sec.
2. **Additionally, we are introducing natural gas into the same line downstream of SDV-621 at a minimum of 12 SCFM which is achieved by positioning the fuel gas control valve TCV-600 at a minimum position of 40%. This assist gas is in addition to the enrichment taking place at the dock safety skid. The exit velocity of each orifice is 6.6 feet/sec at the flow rate as mentioned. The exit velocity is two times compared to the typical flame speeds of Hydrocarbon/Air mixtures.**
3. Finally, a thermocouple is located on the inlet line which is monitoring any increase in the temperature. This will shut down the vapor destruction unit according to 154.2109(d) if it senses a temperature of 250°F.

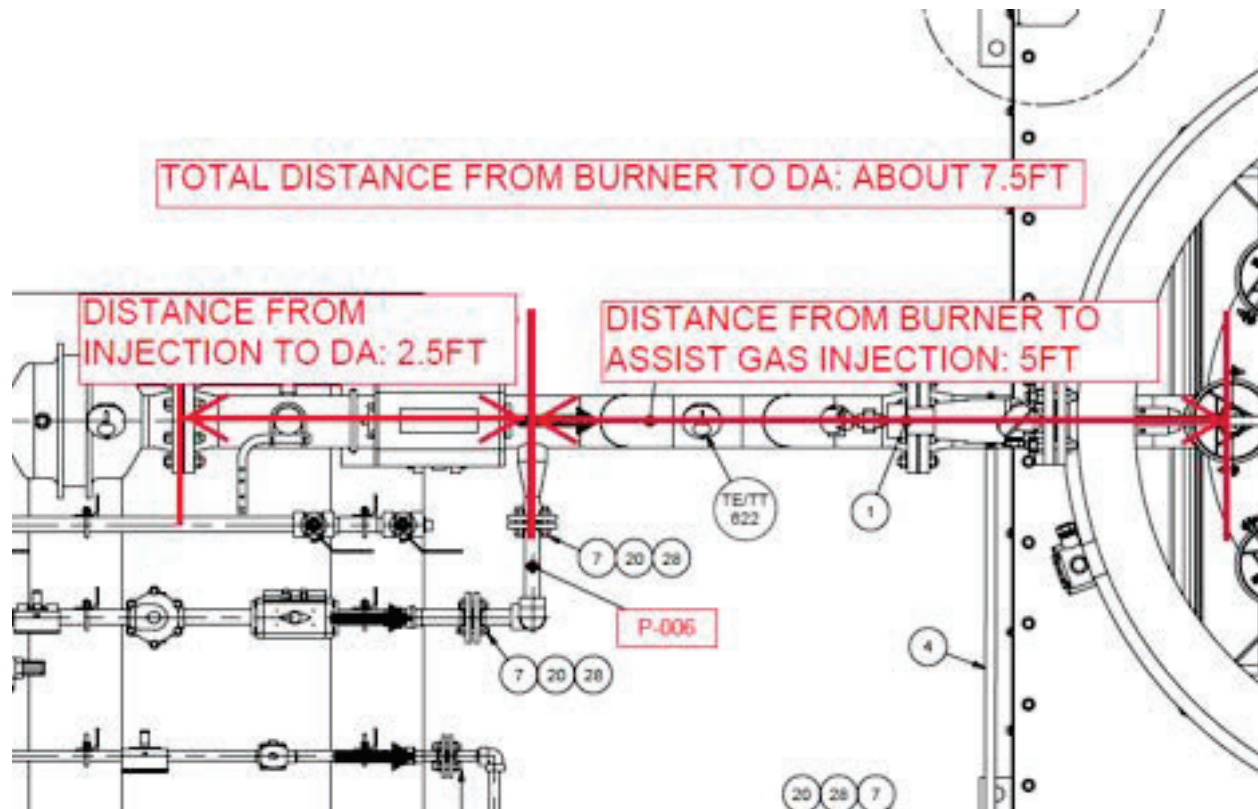


P&ID DETAILS WHERE ASSIST GAS IS INTRODUCED





PLAN VIEW OF GA WHERE CRITICAL SAFETY COMPONENTS ARE LOCATED





2010186 P&ID

1

2

3

4

5

6

A

B

C

D

E

F

G

H

J

K

KO401

PSV401

P411

DA621

PCV600

TCD600A

DESIGN: ASME Section VIII Div. 1, code stamped
DESIGN PRESSURE: 25 PSIG
DESIGN TEMPERATURE: -20/300 F
CORROSION ALLOWANCE: 1/16"
MDMT: -20 F
DIAMETER: 36"
TAN-TAN: 78"

PRESSURE SAFETY VALVE
MANUFACTURER: MERCER
SIZE: 1.5" MNPT X 2" FNPT
ORIFICE: H
CAPACITY: 380 SCFM AIR @ 60°F/ATM
SET PRESSURE: 25 PSIG

DESIGN: 395 SCFM, 55.2"WC
MOTOR: C11 Div 2, 25HP
3600 RPM, TEFC 230/460/3/60

PROTEGO DETONATION ARRESTER
MODEL: DA-SB-200/100-IIA-P1,1
APPROVAL: USCG CFR154
GAS GROUP: GROUP D
CONNECTION: 4" RF 150#
MATERIAL: CS HOUSING, 304SST ELEMENT

FISHER PRESSURE REDUCING REGULATOR
MODEL: 627
ORIFICE: 1/2"
RANGE: 5-20 PSIG
MATERIALS: STEEL BODY & SPRING CASE, AL. TRIM.
MAX. PRESSURE: 250 PSIG, 15 PSIG Set

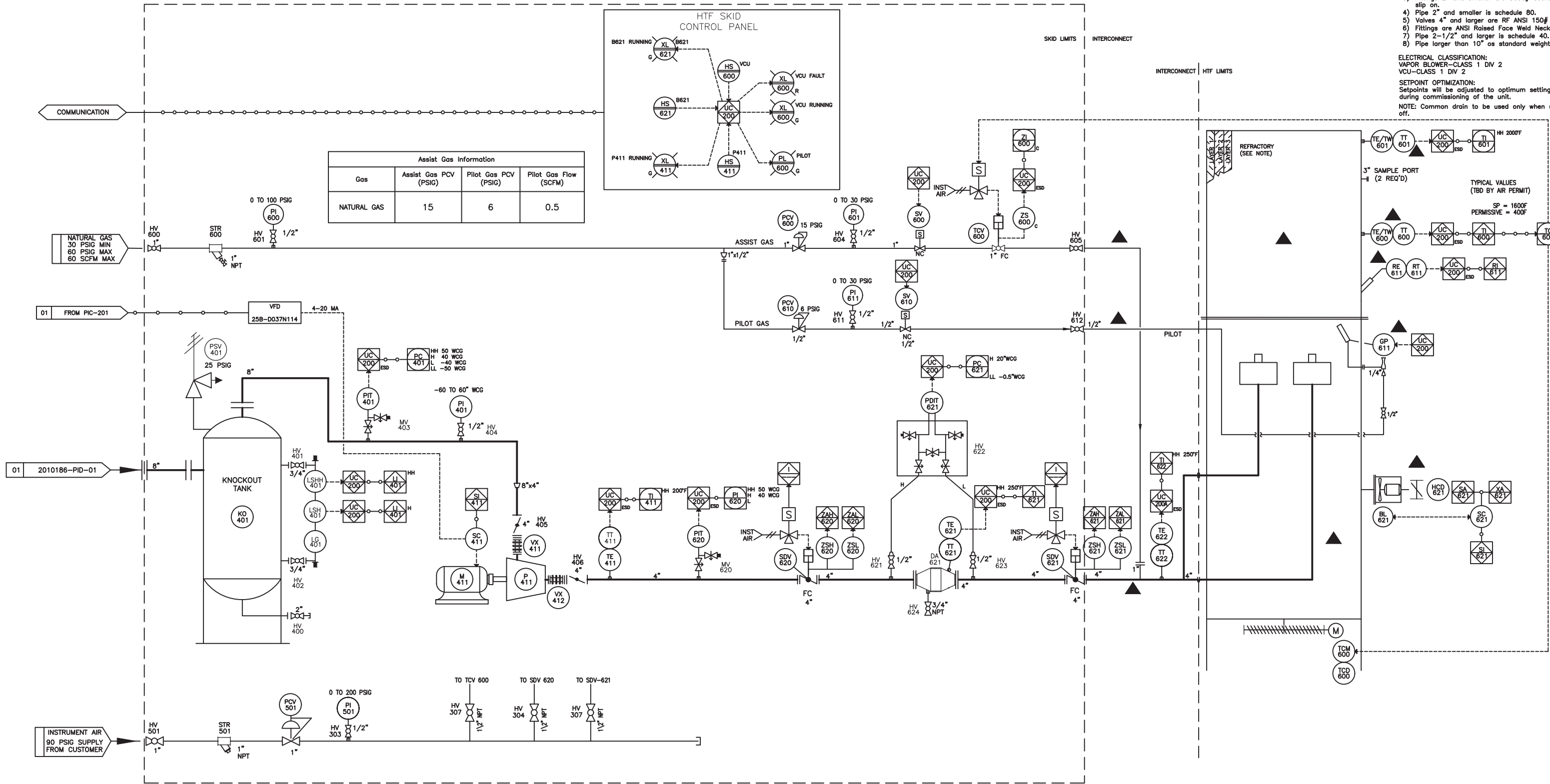
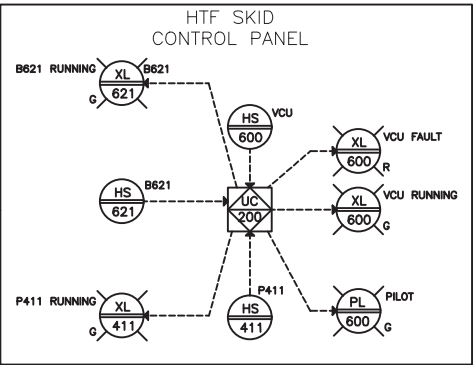
QUENCH AIR DAMPERS
MANUFACTURER: KNAPE
SIZE: 48" X 56"
FRAME MATERIAL: GALVANIZED STEEL
BLADE MATERIAL: GALVANIZED STEEL
BEARING MATERIAL: STAINLESS STEEL

DESIGN DATA			
Stack Diameter	Stack Height	Capacity	Heat Release
5'-5"	40'-0"	2800 BPH	23 MMBTU/HR

REFRACTORY:
CERAMIC FIBER BLANKET
LAYER 1: 1" Thick, 2400 F, 8# Density
LAYER 2: 1" Thick, 2400 F, 8# Density
LAYER 3: 1" Thick, 2400 F, 8# Density
Includes colloidal silica rigidizer.
Inconel 600 pins and washers.
PIPING STANDARD
1) Piping standard is ASME B31.3
2) 1A1A spec. call for <2" SWxNPT and flanged >=2"
3) Fittings 2" and smaller are 3000# socket weld or slip on.
4) Pipe 2" and smaller is schedule 80.
5) Valves 4" and larger are RF ANSI 150# Flanged.
6) Fittings are ANSI Raised Face Weld Neck 150#.
7) Pipe 2-1/2" and larger is schedule 40.
8) Pipe larger than 10" is standard weight

ELECTRICAL CLASSIFICATION:
VAPOR BLOWER-CLASS 1 DIV 2
VCU-CLASS 1 DIV 2
SETPOINT OPTIMIZATION:
Setpoints will be adjusted to optimum settings during commissioning of the unit.
NOTE: Common drain to be used only when unit is off.

Assist Gas Information			
Gas	Assist Gas PCV (PSIG)	Pilot Gas PCV (PSIG)	Pilot Gas Flow (SCFM)
NATURAL GAS	15	6	0.5



NOTES:

- SKID ELECTRICAL CLASSIFICATION CLASS 1, DIV II, GROUPS C & D
- LOCAL
- LOCAL PANEL MOUNT
- CIMARRON PLC

- CIMARRON HMI INDICATION
- INTERLOCK W/ SHUTDOWNS
- INTERLOCK ALARM

- ELECTRICAL SIGNAL
- COMMUNICATION SIGNAL

PROPRIETARY INFORMATION
THIS DRAWING INCLUDES VALUABLE PRODUCT INFORMATION, A SUBSTANTIAL PORTION OF WHICH IS PROPRIETARY TO JORDAN TECHNOLOGIES. AS SUCH, THIS DRAWING IS SUBMITTED IN CONFIDENCE TO THE PARTY TO WHICH IT IS ADDRESSED. ANY EFFORT TO COPY OR SHARE THIS INFORMATION WITH ANOTHER PARTY WILL BE CONSIDERED A VIOLATION OF JORDAN TECHNOLOGIES PROPRIETARY PROPERTY RIGHTS AND A BASIS FOR LEGAL ACTION. FURTHER, THIS ENTIRE DOCUMENT IS THE SUBJECT OF COPYRIGHT PROTECTION UNDER TITLE 17 UNITED STATES CODE AND THE PARIS CONVENTION. © 2014 JORDAN TECHNOLOGIES ALL RIGHTS RESERVED.

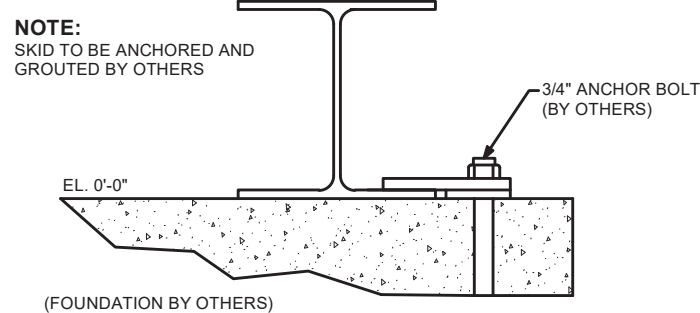
CUSTOMER/LOCATION
MARTIN LP
BEAUMONT, TX
DESCRIPTION
PIPING & INSTRUMENTATION DIAGRAM (P&ID)
KOD, BLOWER SKID, HTF
JOB #
2010186



MODEL
SHEET 3 OF 3
DRAWING 2010186-PID-01
REV AB



2010186 VCU General Arrangement



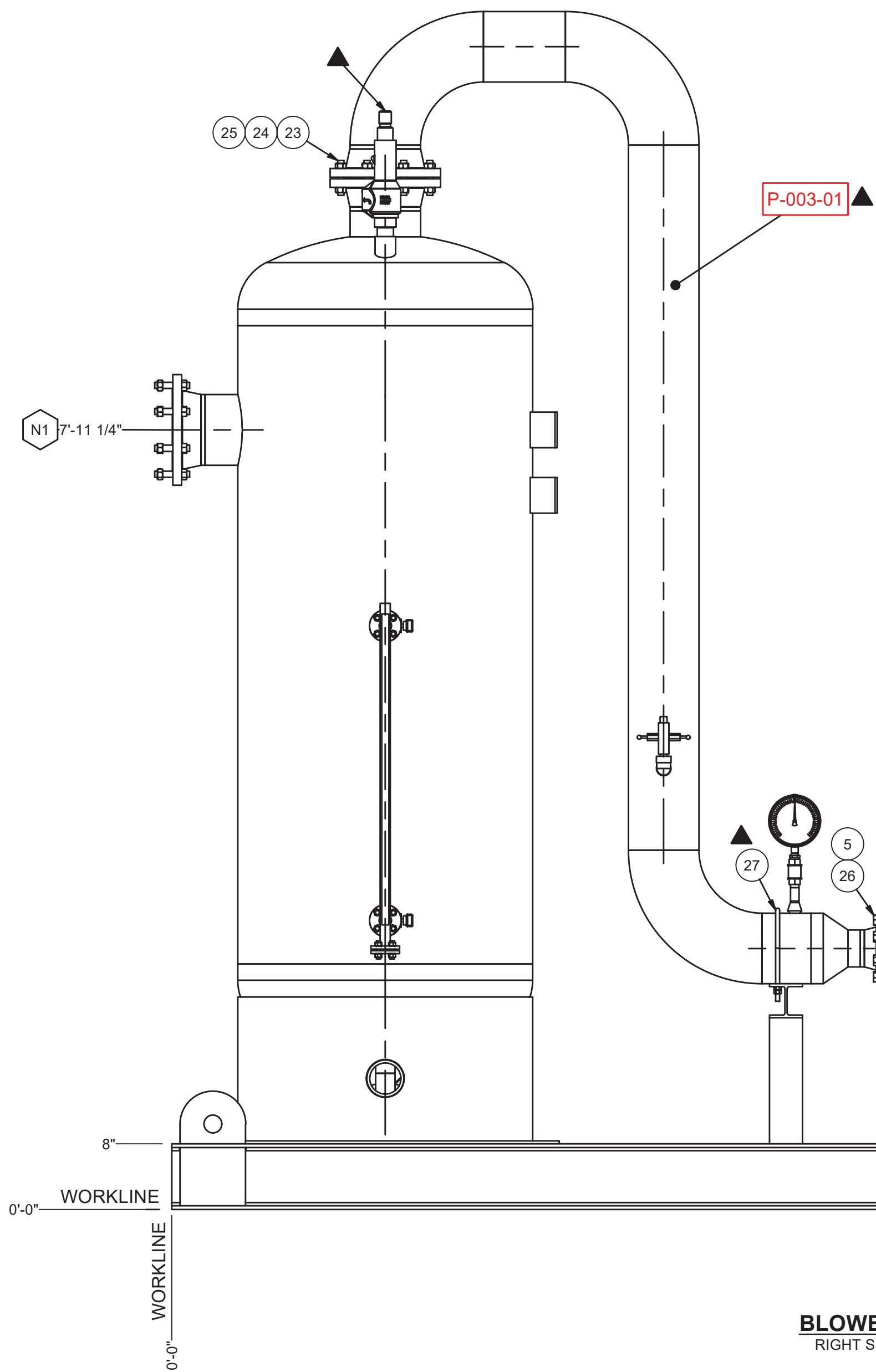
Technical drawing of a square plate with the following dimensions and features:

- Overall width: 1'-0"
- Overall height: 1'-0"
- Distance from left edge to center of left hole: 1 1/2"
- Distance from right edge to center of right hole: 1 1/2"
- Distance between centers of left and right holes: 9"
- Distance from top edge to center of top hole: 9"
- Distance from bottom edge to center of bottom hole: 9"
- Hole diameter: $\varnothing 1 \frac{1}{4}"$

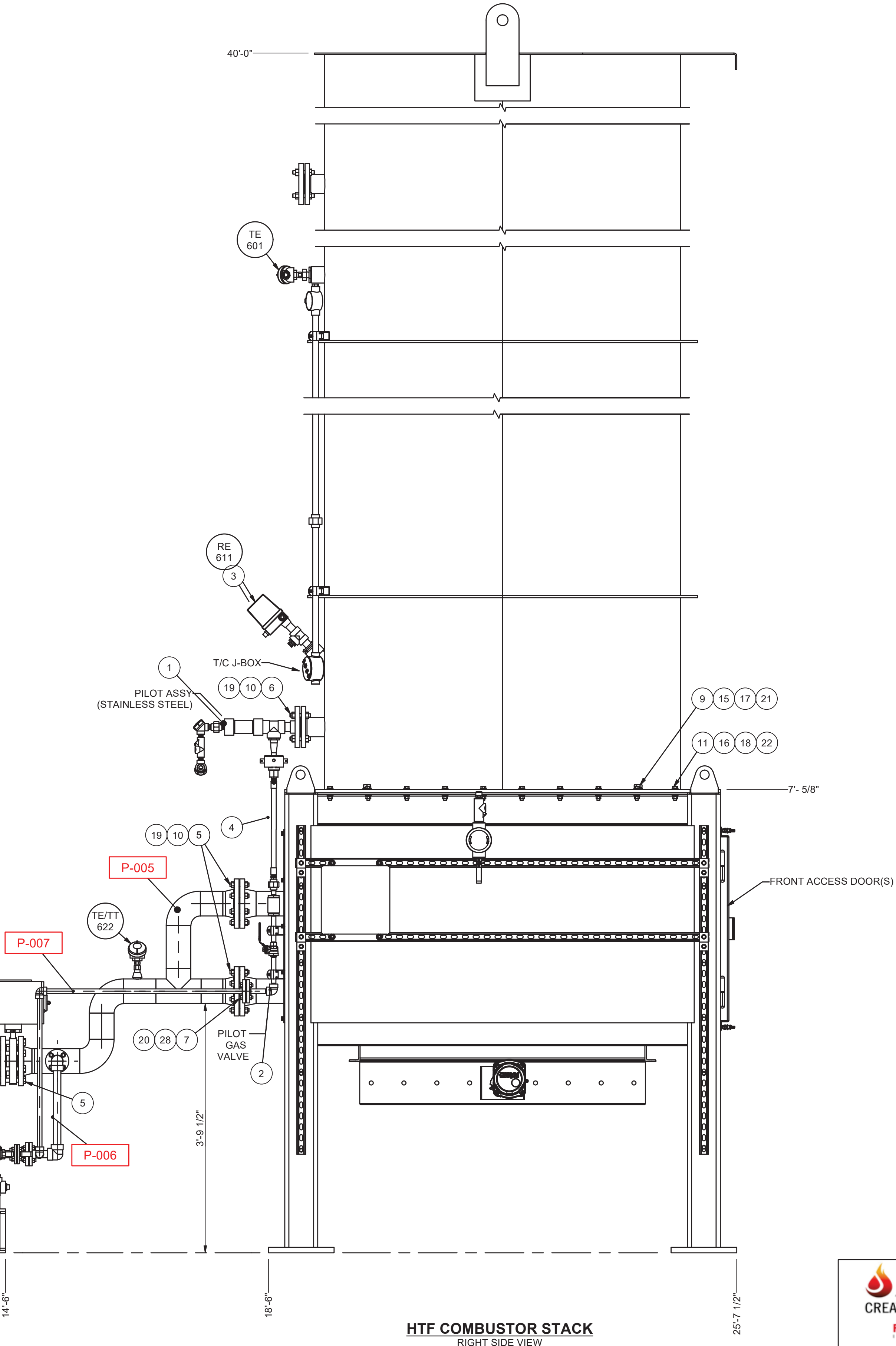
UNLESS OTHERWISE SPECIFIED ALL DIMENSIONS ARE IN INCHES. DO NOT SCALE DRAWING	
TOLERANCE	
OVERALL ELEVATION	±1"
NOZZLE ELEVATION	±1/2"
GUYWIRE ELEVATION	±1"
FRACTIONS	±1/16"
DECIMALS .XX	±.06
DECIMALS .XXX	±.030
ANGLE	±1°
SQUARENESS	
ACROSS FACE	±1/16"
FLANGE ROTATION	±1/16" MAX
THIRD ANGLE PROJECTION	
	

QTY REQD:	APPROX WEIGHT/LBS
1	15,435

1	10/13/21	ISSUED FOR CONSTRUCTION	JVA	BK	BK
REV	DATE	DESCRIPTION	BY	CHK'D	APPR
REVISION HISTORY					
CUSTOMER/LOCATION					
MARTIN LP STANOLIND, TX					
TITLE			SCALE: N.T.S. PROJECT NO: 2010186		
SYSTEM ASSEMBLY INTERCONNECT PIPING			SHEET 1 OF 3 DWG NO. 2010186-GA-005 REV LEVEL 1		



BLOWER SKID
RIGHT SIDE VIEW



HTF COMBUSTOR STACK
RIGHT SIDE VIEW



CREATING A CLEANER PLANET

FLARE JORDAN
INDUSTRIES TECHNOLOGIES

SCALE	N.T.S	PROJECT NO.	2010186
SHEET	2 OF 3	DWG NO.	2010186-GA-005
		REV LEVEL	1



WARNER NICHOLSON CONSULTANTS, PLLC

Enclosure 5
WN CE Acceptance Letter

Enclosure 5



Commandant
United States Coast Guard

2703 Martin Luther King Jr. Ave SE
Stop 7509
Staff Symbol: CG-ENG-5
Phone: (202) 372-1412
Fax: (202) 372-8380

16703/2020-01-06T174800
February 12, 2020

Warner Nicholson Consultants, PLLC
Attn: Jon Young
Principal Engineer
PO Box 24
Wellborn, TX 77881

Subj: ACCEPTANCE – CERTIFYING ENTITY FOR 33 CFR 154, MARINE VAPOR
CONTROL SYSTEMS

Dear Mr. Young:

This is in response to your e-mail of December 31, 2019, which requested an update to your company's name for facility marine vapor control system (VCS) certifications. Your company is currently approved under the name Warner Nicholson Engineering Consultants, PC (WNEC). You stated that the name will change to Warner Nicholson Consultants, PLLC (WNC). You are the sole owner and employee of Warner Nicholson Consultants, PLLC and will be the point of contact for marine VCS certifications.

Because you will have the same personnel for marine VCS certifications, Warner Nicholson Consultants, PLLC (WNC) is found acceptable to continue to certify marine VCSs as meeting the requirements of Title 33 Code of Federal Regulations (CFR) part 154, subpart P. You will be listed as WNC's point of contact. All the terms of CDR R. F. Corbin's letter of October 26, 1998, initially establishing WNEC as a facility marine VCS certifying entity, and CDR L. M. Roldan's letter of November 15, 2010, updating the company information, still apply. We understand that WNEC still has contracts to finish, so you will keep WNEC open until those contracts are finished. You will notify our office once all current WNEC contracts are completed at which time we will remove WNEC from our list of approved Certifying Entities. All new contracts will be with WNC.

If you have any questions, please contact my staff at hazmatstandards@uscg.mil.

Sincerely,

A handwritten signature in blue ink, appearing to read "M. J. Montemerlo".

M. J. MONTEMERLO
Commander, U. S. Coast Guard
Chief, Hazardous Materials Division
By direction



WARNER NICHOLSON CONSULTANTS, PLLC

Enclosure 6
MVCS
Equipment P&IDs

1

2

3

4

5

6

PW201

PROTEGO PRESSURE VACUUM VENT
MODEL NUMBER: VD/SV-PA-PF-150
4" 150# PROCESS CONNECTION
6" VENT WITH 30x30 MESH FLAME SCREEN
SETPOINTS: 1.0 PSIG PRESSURE & 0.5 PSIG VACUUM
MATERIALS: CARBON STEEL 316 SS PALLET & SEAT
RING FEP TEFLON PALLET SEAL

F201

INDUSTRIAL FILTER MANUFACTURERS
MODEL NUMBER: VF5M1009SP/2
4" 150# PROCESS CONNECTIONS
35 SQ FT POLYESTER FELT ELEMENT
SWING CLAMP OPENING TOP
98% EFFICIENCY AT 10 MICRON RETENTION

DA201

PROTEGO DETONATION ARRESTER
MODEL NUMBER: DA-SB-200/100-IIA-P1,1
APPROVAL: USCG 33CFR154
GAS GROUP: GROUP D
CONNECTION: 4" RF 150#
PRESSURE DROP: 8" W.C. @ 20,000 SCFH AIR
MATERIAL: CS BODY, 304SS ELEMENT

PCV101

FISHER PRESSURE REDUCING REGULATOR
MODEL: 299H
ORIFICE: 1"
REGISTRATION: EXTERNAL
RANGE: 14-35 PSIG
MATERIALS: CAST IRON
MAX. PRESSURE: 150 PSIG, 30 PSIG Set

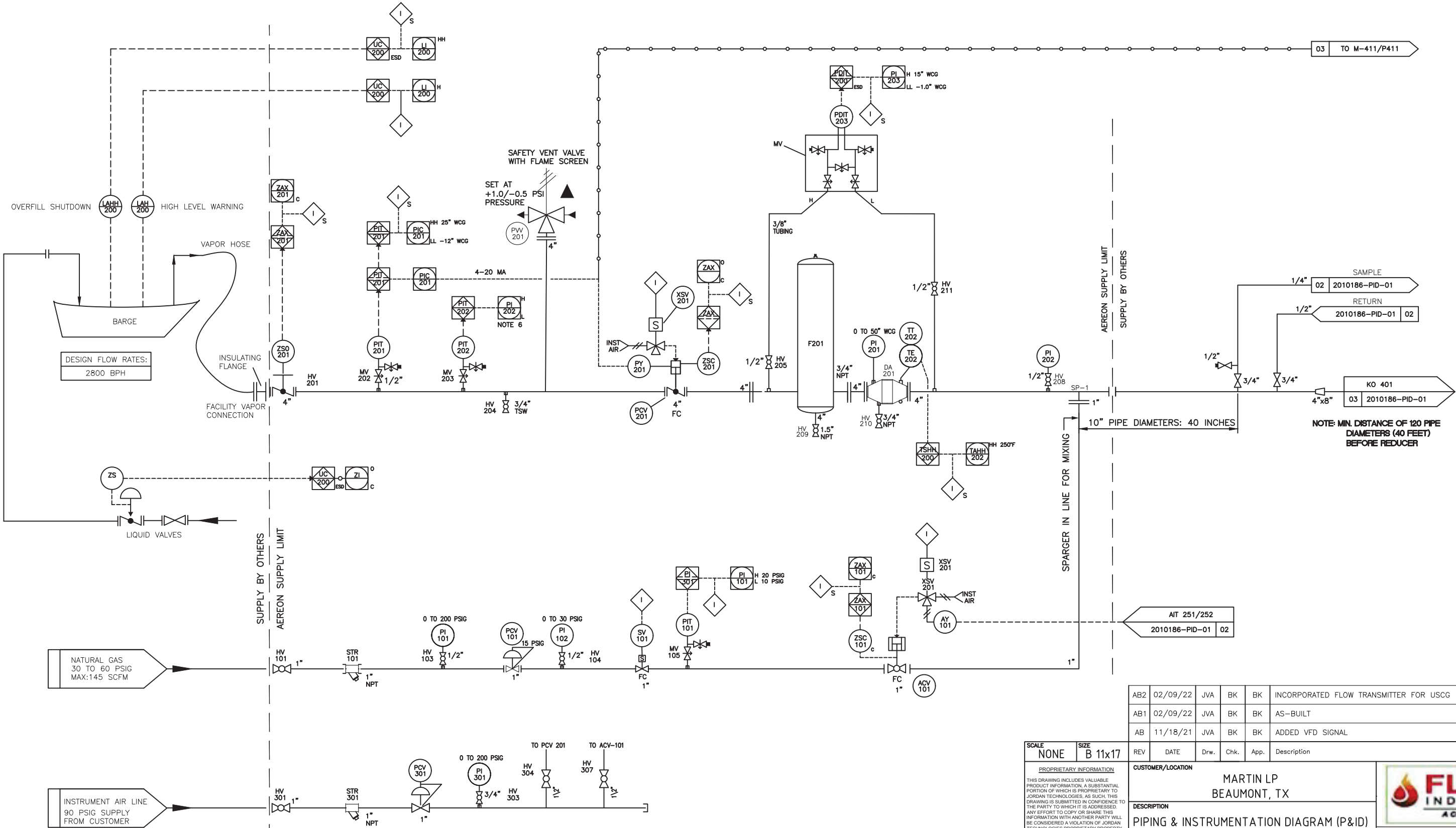
NOTES

- THE LAST 1 METER OF PIPING BEFORE THE FACILITY VAPOR CONNECTION SHALL BE PAINTED AS FOLLOWS:
- .1m (4") RED BAND, .8 m (31 1/2") YELLOW BAND, .1m (4") RED BAND
- ANY CHANGES MADE TO THIS SYSTEM MAY REQUIRE RECERTIFICATION BY THE USCG
- ANY FAULT CONDITION ACTIVATES HORN AND BEACON.
- DETONATION ARRESTOR MUST BE LOCATED WITHIN 18 METERS (59.1') OF THE FACILITY VAPOR CONNECTION PER USCG TITLE 33, CHAPTER 1, SUB PART 0, PART 154, SUB PART P, §154.2110
- ENRICHMENT INJECTION POINT MUST BE LOCATED WITHIN 22m (72.2') OF THE FACILITY VAPOR CONNECTION PER USCG TITLE 33, CHAPTER 1, SUB PART 0, PART 154, SUB PART P, §154.2110
- SET PRESSURE DETERMINED BY VESSEL TO BE LOADED.
- ▲ INDICATES EQUIPMENT TO BE SHIPPED LOOSE AND INSTALLED IN FIELD.

PIPING STANDARD
1) Piping standard is ASME B31.3
2) 1A1A spec. call for <2" SWxNPT and flanged >=2"
3) Pipe 2" and smaller is schedule 80.
4) Valves 4" and larger are RF ANSI 150# Flanged.
5) Fittings are ANSI Raised Face Weld Neck 150#.
6) Pipe 2-1/2" and larger is schedule 40.
7) Pipe larger than 10" os standard weight

ELECTRICAL CLASSIFICATION: CLASS 1 DIV 2 GROUP D

SETPOINT OPTIMIZATION:
Setpoints will be adjusted to optimum settings during commissioning of the unit.



AB2	02/09/22	JVA	BK	BK	INCORPORATED FLOW TRANSMITTER FOR USCG
AB1	02/09/22	JVA	BK	BK	AS-BUILT
AB	11/18/21	JVA	BK	BK	ADDED VFD SIGNAL

SCALE		SIZE	REV	DATE	Drw.	Chk.	App.	Description
NONE		B 11x17						
<u>PROPRIETARY INFORMATION</u>			<u>CUSTOMER/LOCATION</u>					
THIS DRAWING INCLUDES VALUABLE PRODUCT INFORMATION, A SUBSTANTIAL PORTION OF WHICH IS PROPRIETARY TO JORDAN TECHNOLOGIES, AS SUCH, THIS DRAWING IS SUBMITTED IN CONFIDENCE TO THE PARTY TO WHICH IT IS ADDRESSED. ANY EFFORT TO COPY OR SHARE THIS INFORMATION WITH ANOTHER PARTY WILL BE CONSIDERED A VIOLATION OF JORDAN TECHNOLOGIES PROPRIETARY PROPERTY RIGHTS AND A BASIS FOR LEGAL ACTION. FURTHER, THIS ENTIRE DOCUMENT IS THE SUBJECT OF COPYRIGHT PROTECTION UNDER TITLE 17 UNITED STATES CODE AND THE PARIS CONVENTION. © 2014 JORDAN TECHNOLOGIES ALL RIGHTS RESERVED.			MARTIN LP BEAUMONT, TX					
			<u>DESCRIPTION</u>					
			PIPING & INSTRUMENTATION DIAGRAM (P&ID) DOCK SAFETY SKID					
			<u>JOB #</u>					
			2010186					
			<u>SHEET</u>			<u>DRAWING</u>		<u>REV</u>
			1 OF 3			2010186-PID-01		AB2



1

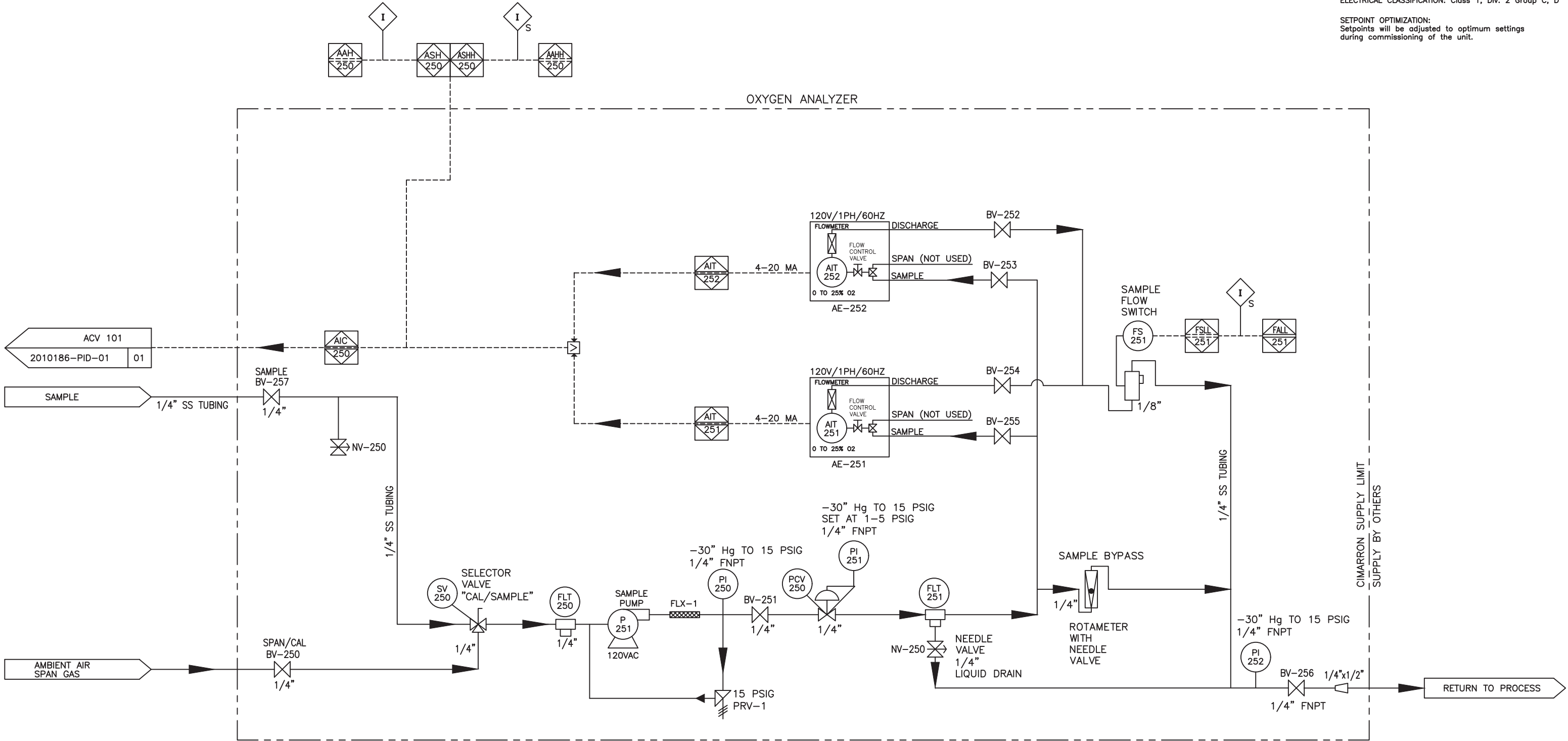
2

3

4

5

6



NOTES

ELECTRICAL CLASSIFICATION: Class 1, Div. 2 Group C, D

SETPOINT OPTIMIZATION:
Setpoints will be adjusted to optimum settings during commissioning of the unit.

<u>PROPRIETARY INFORMATION</u> THIS DRAWING INCLUDES VALUABLE PRODUCT INFORMATION, A SUBSTANTIAL PORTION OF WHICH IS PROPRIETARY TO JORDAN TECHNOLOGIES. AS SUCH, THIS DRAWING IS SUBMITTED IN CONFIDENCE TO THE PARTY TO WHICH IT IS ADDRESSED. ANY EFFORT TO COPY OR SHARE THIS INFORMATION WITH ANOTHER PARTY WILL BE CONSIDERED A VIOLATION OF JORDAN TECHNOLOGIES PROPRIETARY PROPERTY RIGHTS AND A BASIS FOR LEGAL ACTION. FURTHER, THIS ENTIRE DOCUMENT IS THE SUBJECT OF COPYRIGHT PROTECTION UNDER TITLE 17 UNITED STATES CODE AND THE PARIS CONVENTION. © 2014 JORDAN TECHNOLOGIES ALL RIGHTS RESERVED.		<u>CUSTOMER/LOCATION</u> MARTIN LP BEAUMONT, TX			
<u>DESCRIPTION</u> PIPING & INSTRUMENTATION DIAGRAM (P&ID) O2 ANALYZER		<u>MODEL</u>			
<u>JOB #</u> 2010186	<u>SHEET</u> 2 OF 3		<u>DRAWING</u> 2010186-PID-01	<u>REV</u> AB2	

KO401

DESIGN: ASME Section VIII Div. 1, code stamped
DESIGN PRESSURE: 25 PSIG
DESIGN TEMPERATURE: -20/300 F
CORROSION ALLOWANCE: 1/16"
MDMT: -20 F
DIAMETER: 36"
TAN-TAN: 78"

PSV401

PRESSURE SAFETY VALVE
MANUFACTURER: MERCER
SIZE: 1.5" MNPT X 2" FNPT
ORIFICE: H
CAPACITY: 380 SCFM AIR @ 60°F/ATM
SET PRESSURE: 25 PSIG

P411

DESIGN: 395 SCFM, 55.2"WC
MOTOR: C11 Div 2, 25HP
3600 RPM, TEFC 230/460/3/60

DA621

PROTEGO DETONATION ARRESTER
MODEL: DA-SB-200/100-IIA-P1,1
APPROVAL: USCG CFR154
GAS GROUP: GROUP D
CONNECTION: 4" RF 150#
MATERIAL: CS HOUSING, 304SST ELEMENT

PCV600

FISHER PRESSURE REDUCING REGULATOR
MODEL: 627
ORIFICE: 1/2"
RANGE: 5-20 PSIG
MATERIALS: STEEL BODY & SPRING CASE, AL. TRIM.
MAX. PRESSURE: 250 PSIG, 15 PSIG Set

TCD600A

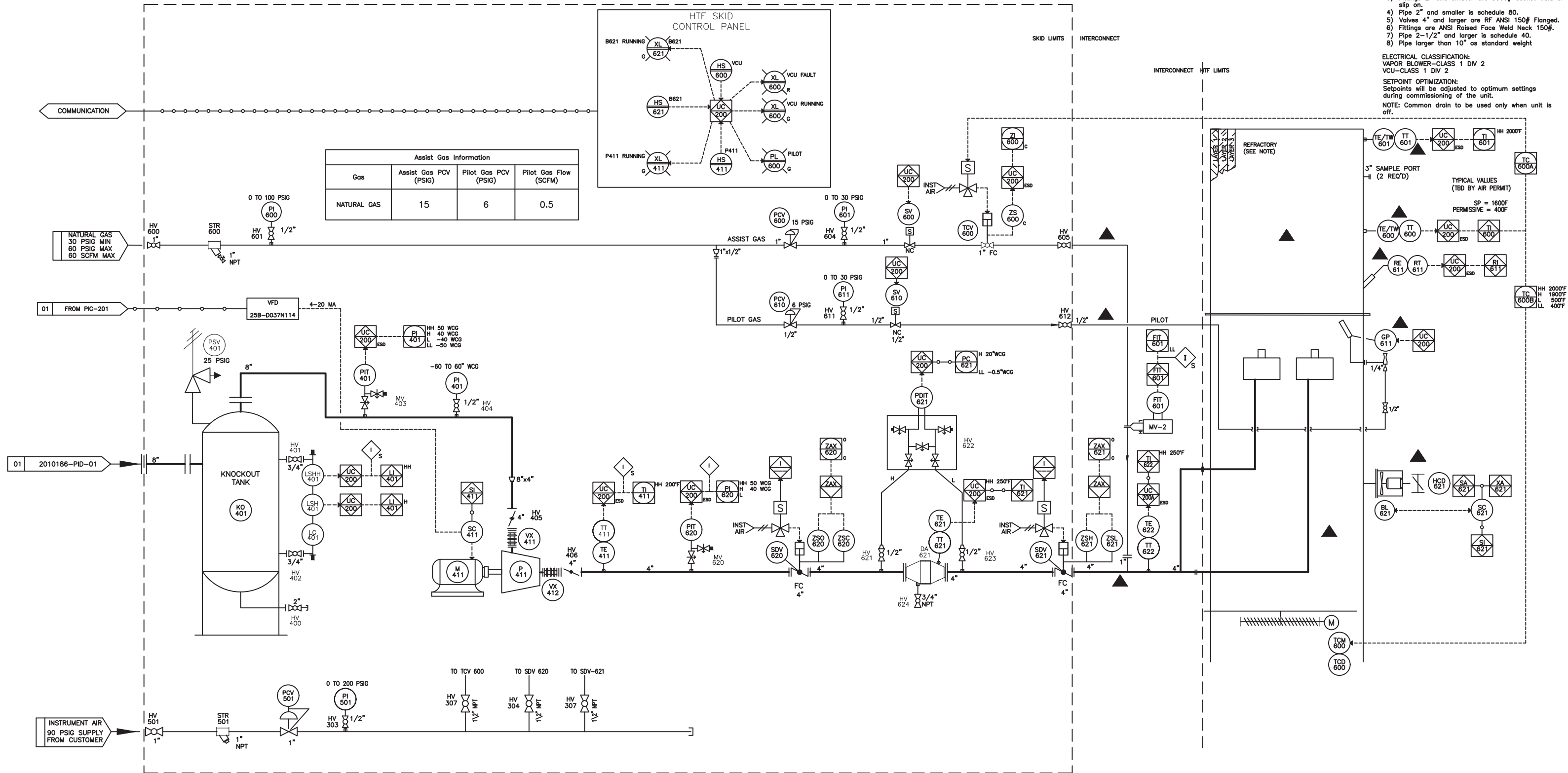
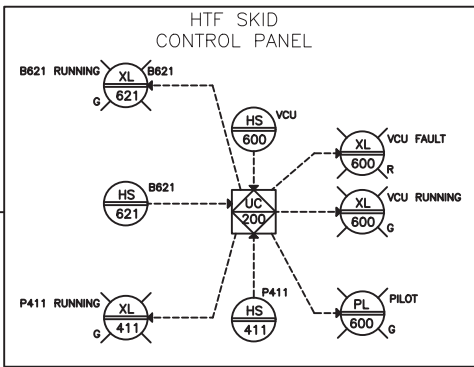
QUENCH AIR DAMPERS
MANUFACTURER: KNAPE
SIZE: 48" X 56"
FRAME MATERIAL: GALVANIZED STEEL
BLADE MATERIAL: GALVANIZED STEEL
BEARING MATERIAL: STAINLESS STEEL

DESIGN DATA			
Stack Diameter	Stack Height	Capacity	Heat Release
5'-5"	40'-0"	2800 BPH	23 MMBTU/HR

REFRACTORY:
CERAMIC FIBER BLANKET
LAYER 1: 1" Thick, 2400 F, 8# Density
LAYER 2: 1" Thick, 2400 F, 8# Density
LAYER 3: 1" Thick, 2400 F, 8# Density
Includes colloidal silica rigidizer.
Inconel 600 pins and washers.
PIPING STANDARD
1) Piping standard is ASME B31.3
2) 1A1A spec. call for <2" SWNPT and flanged >=2"
3) Fittings 2" and smaller are 3000# socket weld or slip on.
4) Pipe 2" and smaller is schedule 80.
5) Valves 4" and larger are RF ANSI 150# Flanged.
6) Fittings are ANSI Raised Face Weld Neck 150#.
7) Pipe 2-1/2" and larger is schedule 40.
8) Pipe larger than 10" is standard weight

ELECTRICAL CLASSIFICATION:
VAPOR BLOWER-CLASS 1 DIV 2
VCU-CLASS 1 DIV 2
SETPOINT OPTIMIZATION:
Setpoints will be adjusted to optimum settings during commissioning of the unit.
NOTE: Common drain to be used only when unit is off.

Assist Gas Information			
Gas	Assist Gas PCV (PSIG)	Pilot Gas PCV (PSIG)	Pilot Gas Flow (SCFM)
NATURAL GAS	15	6	0.5



NOTES:

- SKID ELECTRICAL CLASSIFICATION CLASS 1, DIV II, GROUPS C & D
- LOCAL
- LOCAL PANEL MOUNT
- CIMARRON PLC
- CIMARRON HMI INDICATION
- INTERLOCK W/ SHUTDOWNS
- INTERLOCK ALARM
- ELECTRICAL SIGNAL
- COMMUNICATION SIGNAL

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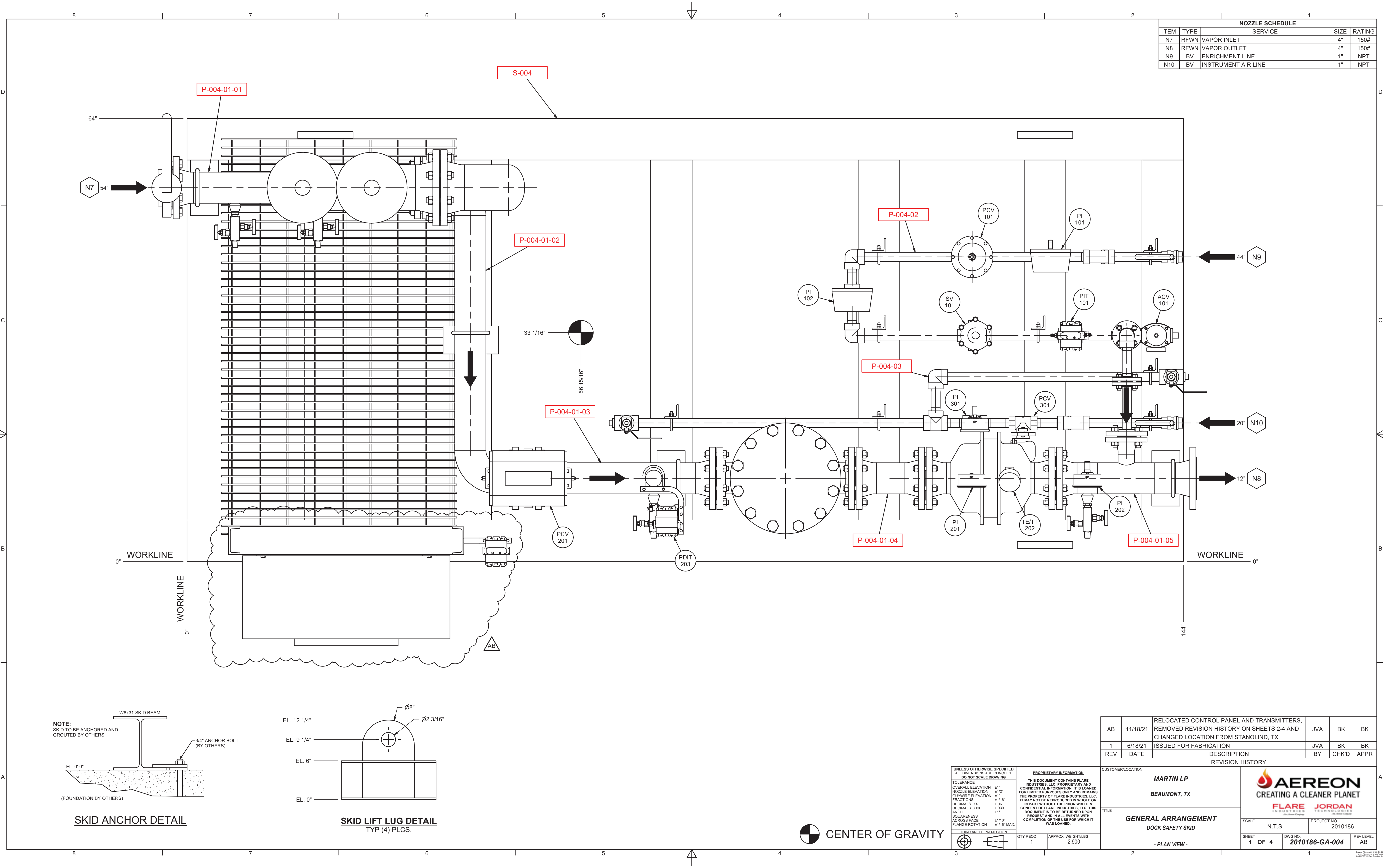
CUSTOMER/LOCATION	
MARTIN LP BEAUMONT, TX	
DESCRIPTION	
PIPING & INSTRUMENTATION DIAGRAM (P&ID) KOD, BLOWER SKID, HTF	
JOB #	2010186

MODEL	
FLARE INDUSTRIES A CIMARRON COMPANY	
SHEET	3 OF 3
DRAWING	2010186-PID-01
REV	AB2

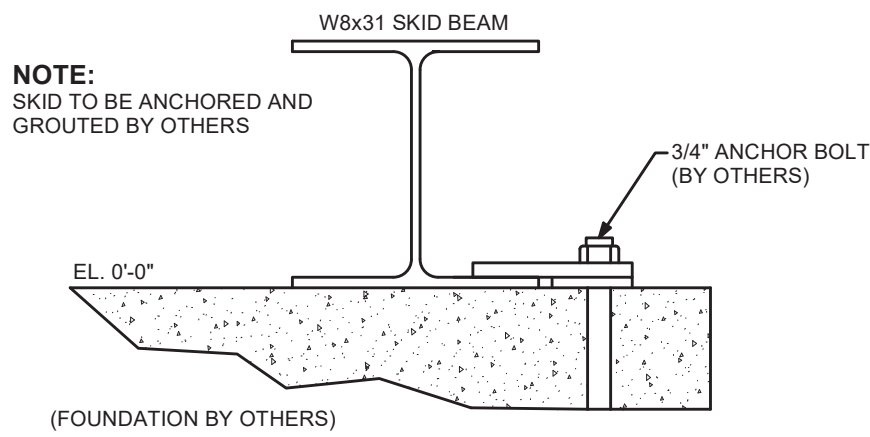


WARNER NICHOLSON CONSULTANTS, PLLC

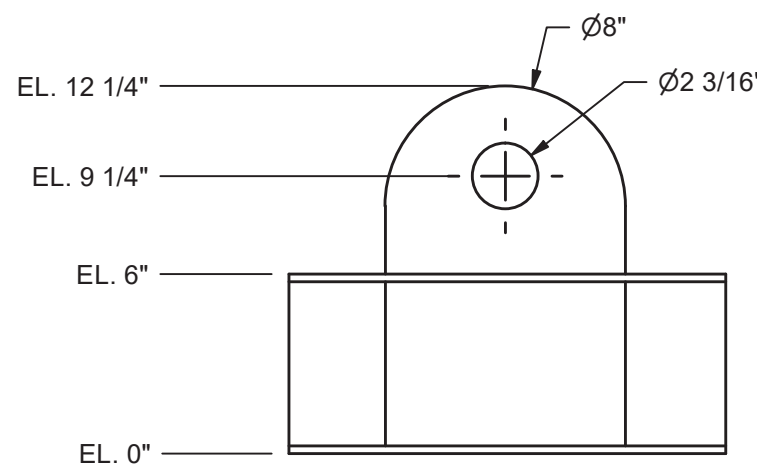
Enclosure 7
Equipment General Arrangement



NOZZLE SCHEDULE				
ITEM	TYPE	SERVICE	SIZE	RATING
N7	RFWN	VAPOR INLET	4"	150#
N8	RFWN	VAPOR OUTLET	4"	150#
N9	BV	ENRICHMENT LINE	1"	NPT
N10	BV	INSTRUMENT AIR LINE	1"	NPT



SKID ANCHOR DETAIL



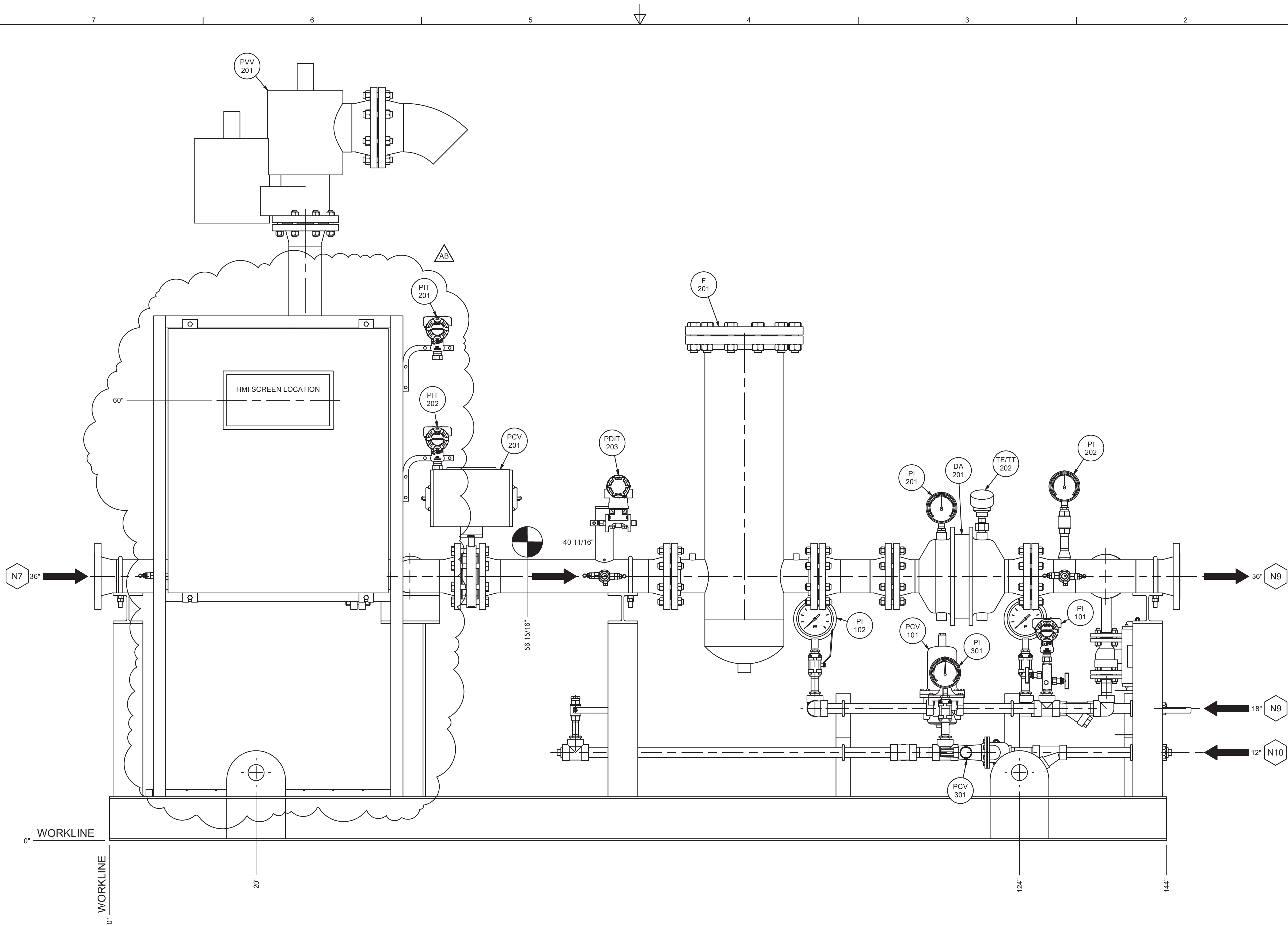
SKID LIFT LUG DETAIL
TYP (4) PLCS.

UNLESS OTHERWISE SPECIFIED ALL DIMENSIONS ARE IN INCHES. DO NOT SCALE DRAWING	
TOLERANCE	
OVERALL ELEVATION	±1"
NOZZLE ELEVATION	±1/2"
CLYWIRED ELEVATION	±1"
FRACTIONS	±1/16"
DECIMALS .XX	±.06
DECIMALS .XXX	±.030
ANGLE	±1°
SQUARENESS	±1"
ACROSS FACE	±1/16"
FLANGE ROTATION	±1/16" MAX.
THIRD ANGLE PROJECTION	
QTY REQD:	1
APPROX. WEIGHT/LBS	2,900

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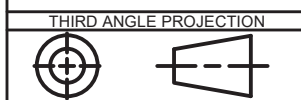
AB	11/18/21	RELOCATED CONTROL PANEL AND TRANSMITTERS, REMOVED REVISION HISTORY ON SHEETS 2-4 AND CHANGED LOCATION FROM STANOLIND, TX	JVA	BK	BK
1	6/18/21	ISSUED FOR FABRICATION	JVA	BK	BK
REV	DATE	DESCRIPTION	BY	CHK'D	APPR
REVISION HISTORY					
CUSTOMER/LOCATION			TITLE		
MARTIN LP BEAUMONT, TX			GENERAL ARRANGEMENT DOCK SAFETY SKID		
- PLAN VIEW -			SCALE	N.T.S	PROJECT NO. 2010186
			SHEET 1 OF 4	DWG NO. 2010186-GA-004	REV LEVEL AB





UNLESS OTHERWISE SPECIFIED
ALL DIMENSIONS ARE IN INCHES
DO NOT SCALE DRAWING

TOLERANCE:
OVERALL ELEVATION ±1"
NOZZLE ELEVATION ±1/2"
GUYWIRE ELEVATION ±1"
FRACTIONS ±1/16"
DECIMALS .XX ±.06
DECIMALS .XXX ±.030
ANGLE ±1°
SQUARENESS ±1/16"
ACROSS FACE ±1/16"
FLANGE ROTATION ±1/16" MAX



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QTY REQD: 1
APPROX. WEIGHT/LBS: 2,900

CUSTOMER/LOCATION

MARTIN LP
BEAUMONT, TX

TITLE

GENERAL ARRANGEMENT
DOCK SAFETY SKID

- FRONT VIEW -



SCALE

N.T.S

PROJECT NO.

2010186

SHEET

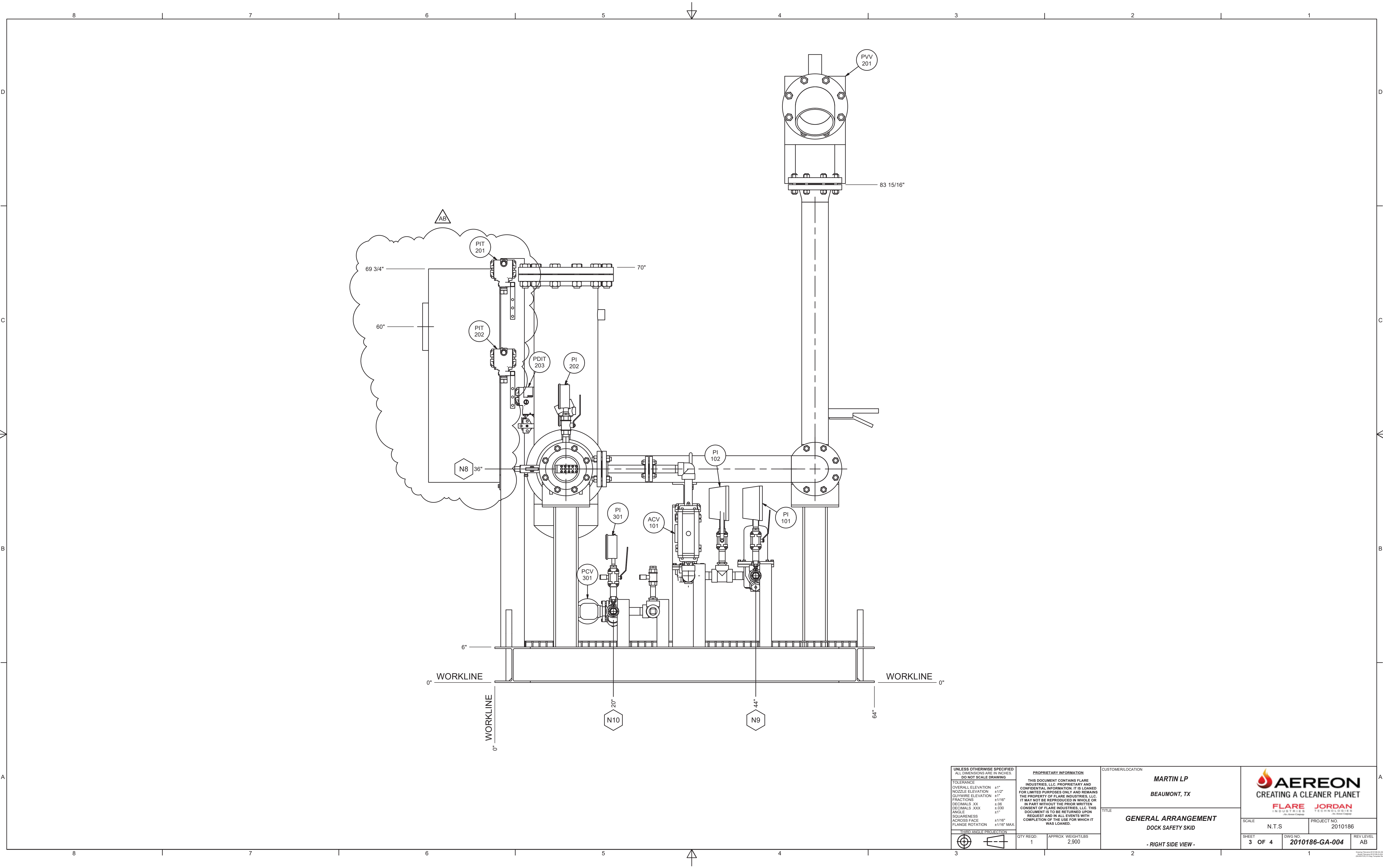
2 OF 4

DWG NO.

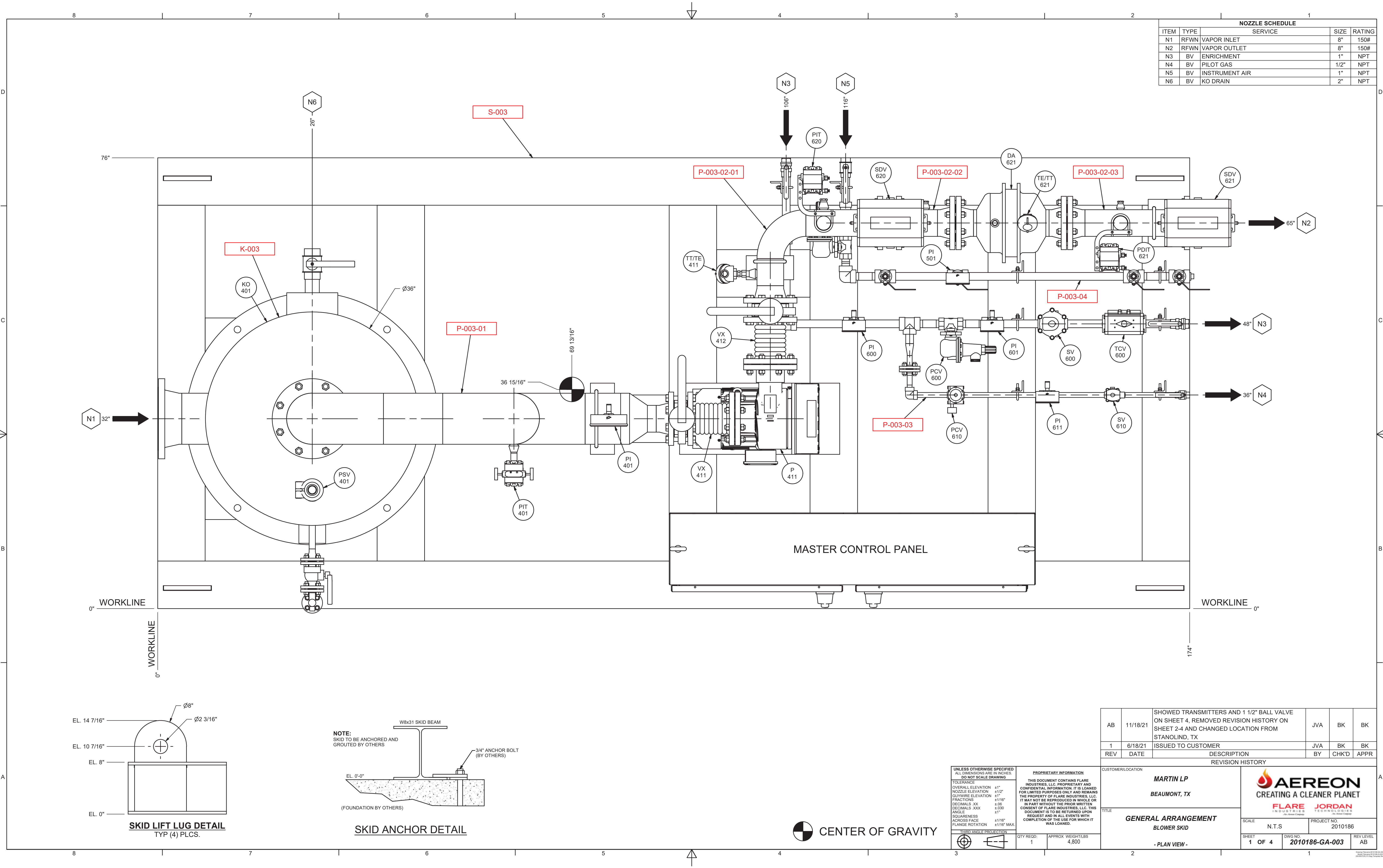
2010186-GA-004

REV LEVEL

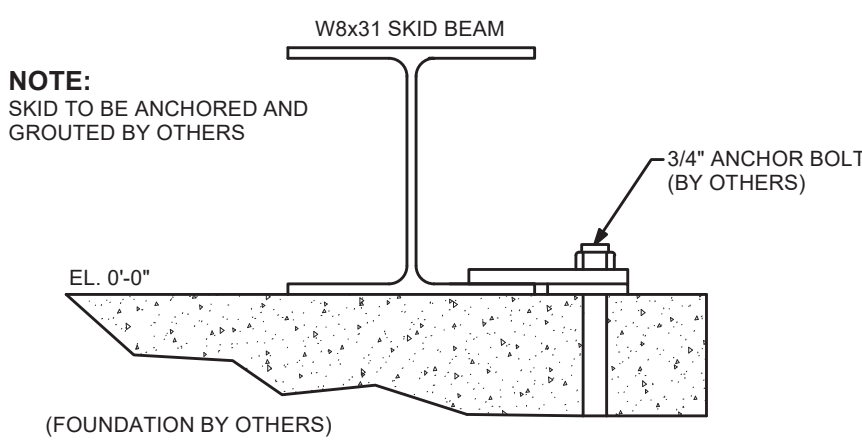
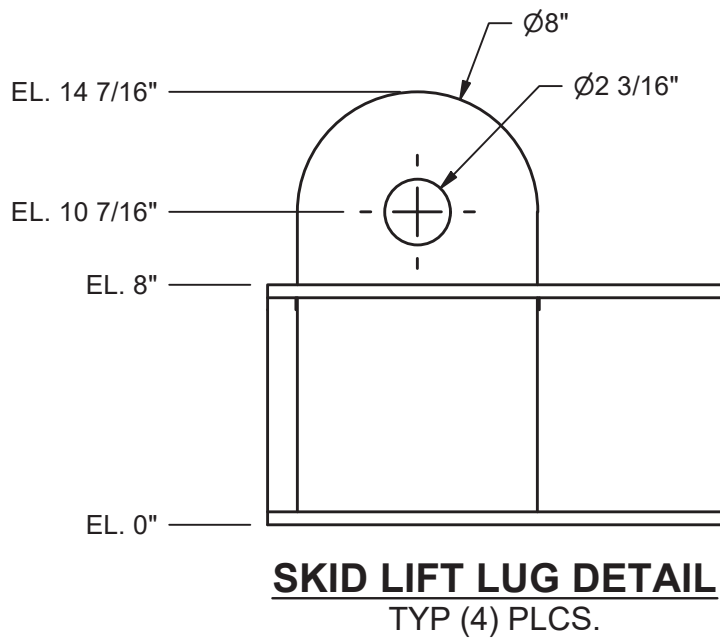
AB



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				MARTIN LP BEAUMONT, TX	
THIRD ANGLE PROJECTION		TITLE GENERAL ARRANGEMENT DOCK SAFETY SKID - RIGHT SIDE VIEW -		SCALE	
				N.T.S	
QTY REQD: 1		APPROX. WEIGHT/LBS 2,900		PROJECT NO. 2010186	
SHEET 3 OF 4		DWG NO. 2010186-GA-004		REV LEVEL AB	



NOZZLE SCHEDULE				
ITEM	TYPE	SERVICE	SIZE	RATING
N1	RFWN	VAPOR INLET	8"	150#
N2	RFWN	VAPOR OUTLET	8"	150#
N3	BV	ENRICHMENT	1"	NPT
N4	BV	PILOT GAS	1/2"	NPT
N5	BV	INSTRUMENT AIR	1"	NPT
N6	BV	KO DRAIN	2"	NPT

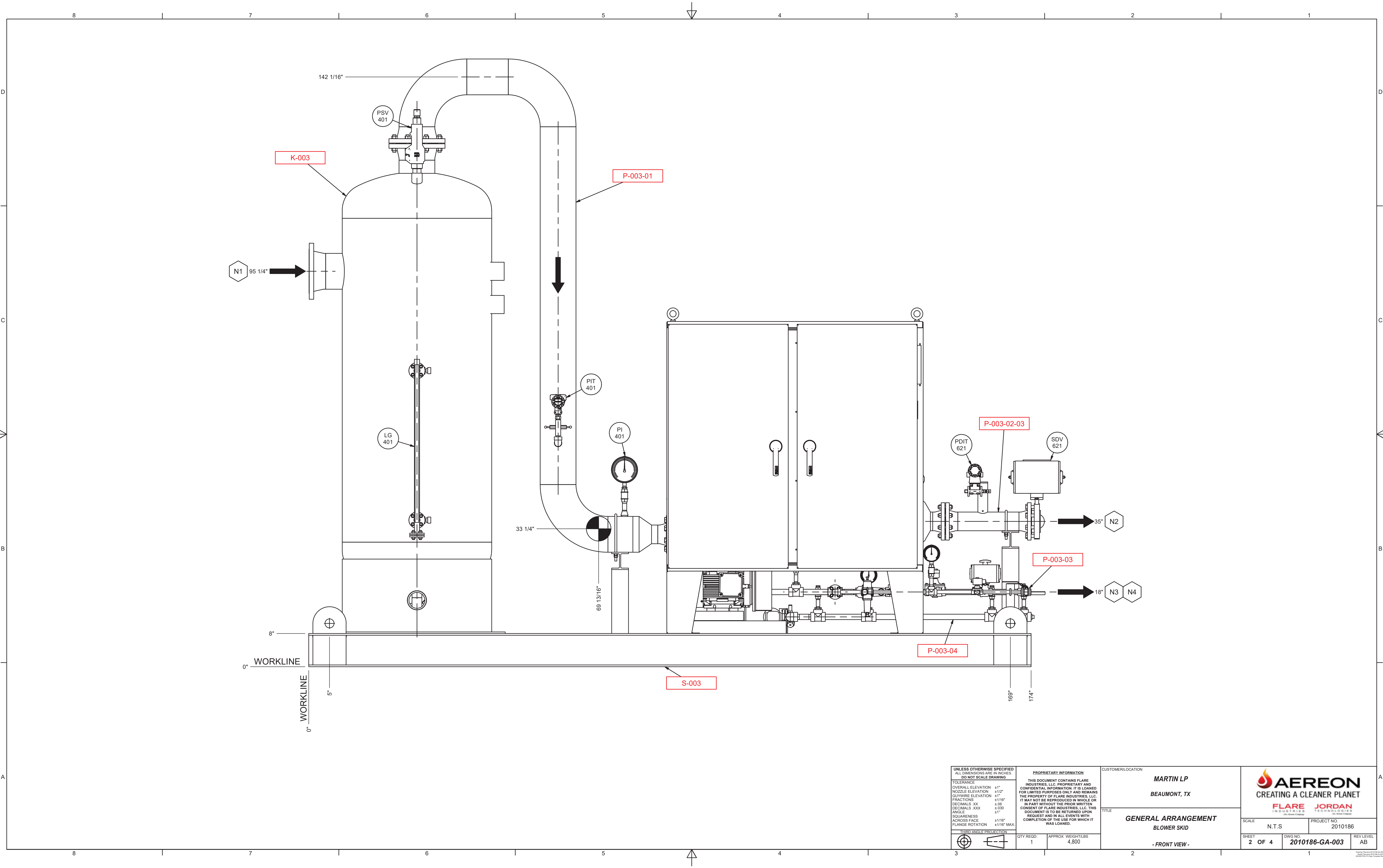


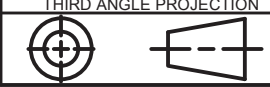
UNLESS OTHERWISE SPECIFIED ALL DIMENSIONS ARE IN INCHES. DO NOT SCALE DRAWING	
TOLERANCE	
OVERALL ELEVATION	±1"
NOZZLE ELEVATION	±1/2"
GLYCOL ELEVATION	±1"
FRACTIONS	±1/16"
DECIMALS .XXX	±.06
DECIMALS .XXX	±.030
ANGLE	±1°
SQUARENESS	±1"
CROSS FACE	±1/16"
FLANGE ROTATION	±1/16" MAX.
THIRD ANGLE PROJECTION	
QTY REQD:	1
APPROX. WEIGHT/LBS	4,800

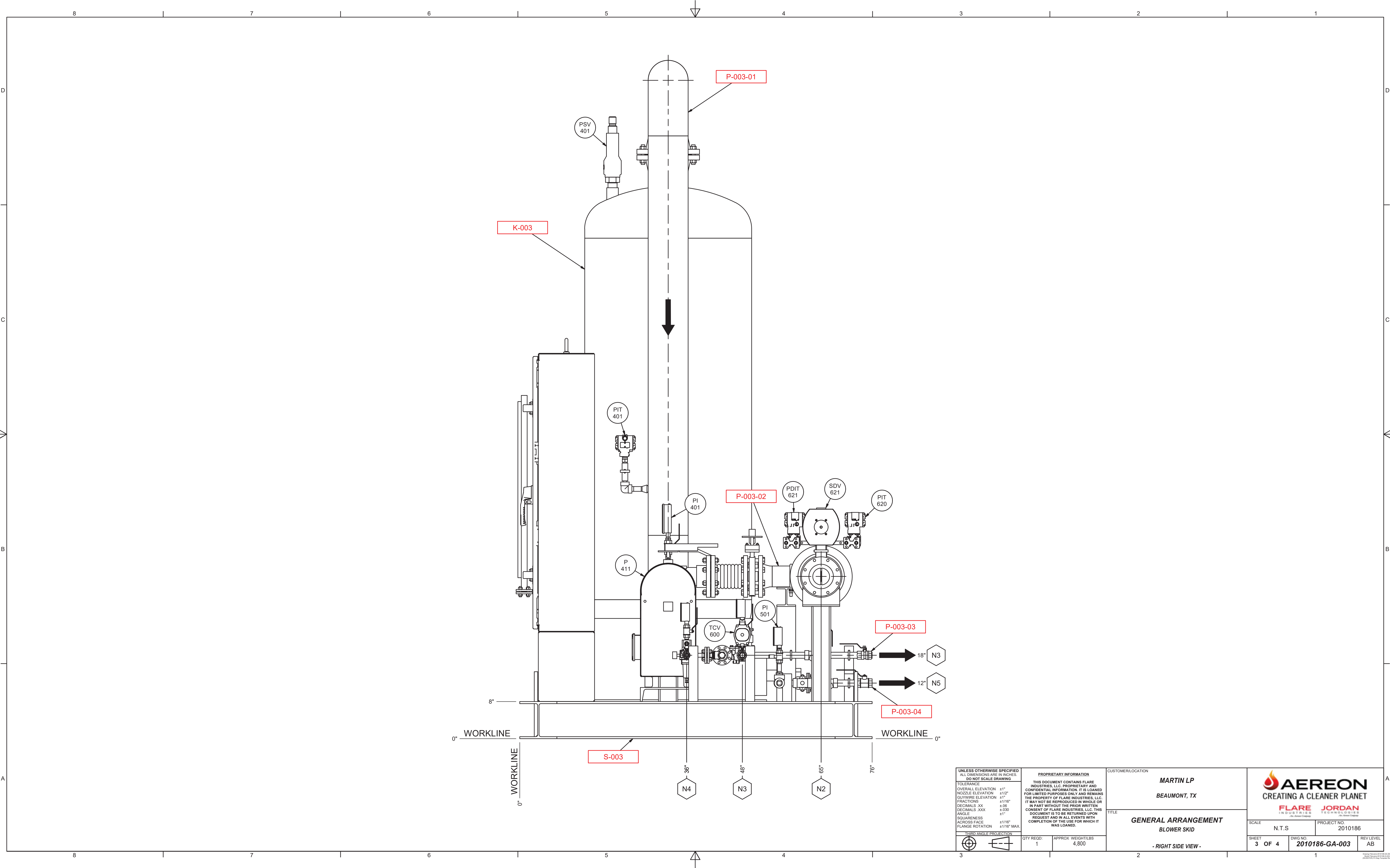
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QTY REQD:	1
APPROX. WEIGHT/LBS	4,800

AB	11/18/21	SHOWED TRANSMITTERS AND 1 1/2" BALL VALVE ON SHEET 4, REMOVED REVISION HISTORY ON SHEET 2-4 AND CHANGED LOCATION FROM STANOLIND, TX		JVA	BK	BK
1	6/18/21	ISSUED TO CUSTOMER		JVA	BK	BK
REV	DATE	DESCRIPTION		BY	CHK'D	APPR
REVISION HISTORY						
CUSTOMER/LOCATION						
MARTIN LP BEAUMONT, TX						
TITLE						
GENERAL ARRANGEMENT BLOWER SKID - PLAN VIEW -						
SCALE				PROJECT NO.		
N.T.S				2010186		
SHEET		DWG NO.		REV LEVEL		
1 OF 4		2010186-GA-003		AB		





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TOLERANCE OVERALL ELEVATION ±1" NOZZLE ELEVATION ±1/2" GUYWIRE ELEVATION ±1" FRACTIONS ±1/16" DECIMALS .XX ±.06 DECIMALS .XXX ±.030 ANGLE ±1° SQUARENESS ±1/16" ACROSS FACE ±1/16" FLANGE ROTATION ±1/16" MAX		THIRD ANGLE PROJECTION 		TITLE GENERAL ARRANGEMENT BLOWER SKID - FRONT VIEW -	
QTY REQD: 1		APPROX. WEIGHT/LBS 4,800		SCALE N.T.S	
SHEET 2 OF 4		DWG NO. 2010186-GA-003		PROJECT NO. 2010186	
				REV LEVEL AB	



UNLESS OTHERWISE SPECIFIED ALL DIMENSIONS ARE IN INCHES. DO NOT SCALE DRAWING	
TOLERANCE	OVERALL ELEVATION ±1"
NOZZLE ELEVATION	±1/2"
GUYWIRE ELEVATION	±1"
FRACTIONS	±1/16"
DECIMALS .XX	±.06
DECIMALS .XXX	±.030
ANGLE	±1°
SQUARENESS	±1/16"
ACROSS FACE	±1/16"
FLANGE ROTATION	±1/16" MAX.
THIRD ANGLE PROJECTION	

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QTY REQD:	1
APPROX. WEIGHT/LBS	4,800

CUSTOMER/LOCATION MARTIN LP BEAUMONT, TX	
TITLE GENERAL ARRANGEMENT BLOWER SKID	
- RIGHT SIDE VIEW -	

SCALE N.T.S.		PROJECT NO. 2010186	
SHEET 3 OF 4		REV LEVEL AB	
DWG NO. 2010186-GA-003			



APPENDIX 7. ACID NEUTRALIZATION WASTE TREATMENT UNIT REGISTRATION

Central Registry

The Customer Name displayed may be different than the Customer Name associated to the Additional IDs related to the customer. This name may be different due to ownership changes, legal name changes, or other administrative changes.

Detail of: **Industrial and Hazardous Waste Solid Waste Registration 87582**
For: **MARTIN PRODUCT SALES STANOLIND TERMINAL (RN106032667 ...)**
10 SULFUR PLANT RD, BEAUMONT

Solid Waste **ACTIVE**
Registration Status:
Held by: **Martin Product Sales LLC (CN602894560 ...)** [View 'Issued To' History ...](#)
OWNER OPERATOR Since 10/22/2004 [View Compliance History ...](#)
Mailing Address: PO BOX 6567 BEAUMONT, TX 77725 -0567

Back to Facility Information

IHW Waste Management Unit

Sequence Number: 009	Unit Type: Miscellaneous storage containers	Unit Status: ACTIVE	Description: Lime and Soil Treatment of Spent Sulfuric Acid Waste		
Permit Number	UIC Number	Manages Off-Site Waste	Management	Capacity	Regulatory Status
		Yes	120 (Combination of chemical, biological, and/or physical treatment)	20.0000 CY	RCRA Permit Exempt<90 Day Storage

IHW Waste Detail

Waste Code: 0002105H	Company Code:			Description: Waste sulfuric acid				
Origin	Recycle	Managed	New Chemical	Waste Stream Status	Source	Management	SIC	NAICS
Result of spill clean-up, equipment decommissioning or emergency removal		Off-Site/On-Site	No	Active	Cleanup of spill residues			424690

Waste Code: 0016319H	Company Code:			Description: Waste sulfuric acid				
Origin	Recycle	Managed	New Chemical	Waste Stream Status	Source	Management	SIC	NAICS
Result of spill clean-up, equipment decommissioning or emergency removal		Off-Site Only	No	Active	Cleaning out process equipment			424710