

INSPECTION REPORT

Inspection Entry Date/Time	3/26/2025 14:40 (CT)	Announced: No
Inspection Exit Date/Time	3/26/2025 15:40 (CT)	Access: Granted
Regulatory Program	RCRA	
Type of Inspection	Compliance Evaluation Inspection (CEI)	
Facility or Site Name	United Mobility Systems DBA American Vacuum	
Facility/Site Identifier	LAR000053033	
Facility/Site Physical Address	1232 Siracusa Rd.	
City, State, Zip Code	Morgan City, LA 70380	
County/Borough	St. Mary	
Generator Status	Non-generator	
NAICS	48411	
Type of Operation	American Vacuum (AV) is a used oil transporter and transfer facility that picks up used oil waste from barges, boats, and other facilities.	
Geographic Coordinates	29.68976, -91.15636	
Additional Persons Participating in Inspection:		
Name	Title	Organization
John Penland	Inspector	EPA REGION 6
Erin Young-Dahl	Inspector	EPA REGION 6
Janosh Wolters	Contractor	Eastern Research Group (ERG)
Lead Inspector:		
Vince Damiano	Vincent Damiano	Digitally signed by Vincent Damiano Date: 2025.05.01 16:03:30 -04'00'
	ERG	Vince.Damiano@erg.com

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

The Port of Morgan City and surrounding facilities were selected for inspection based on a 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 other 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	Email	Opening Conf.	Closing Conf.
Lead Inspector/ Contractor/ERG	Vince Damiano	Vince.Damiano@erg.com	Yes	Yes
Inspector/Enforcement Officer/EPA Region 6	John Penland	Penland.John@epa.gov	Yes	Yes
Inspector/Enforcement Officer/EPA Region 6	Erin Young-Dahl	Youngdahl.Erin@epa.gov	Yes	Yes
RCRA Inspector/ Contractor/ERG	Janosh Wolters	Janosh.Wolters@erg.com	Yes	Yes
American Vacuum/Owner	Rob Guarisco	Americanvacuum1@gmail.com	Yes	Yes
American Vacuum/Foreman	Larry Guillory Sr.	Americanvacuum1@gmail.com	Yes	Yes

Facility General Description

Tenant/Area	Inspection Date	Process Description	Area of Concern
American Vacuum	3/26/2025	AV is a used oil transporter and transfer facility that collects used oil waste from customers. American Vacuum does not operate under a MARPOL COA.	Yes

SECTION II – OBSERVATIONS

Facility: American Vacuum			
Section: 2.1	Date: 3/26/2025, 14:40	Contains AOC: Yes	Contains CBI: No
Lead Inspector: Vince Damiano	Attendees: Larry Guillory Sr. (Foreman) and Rob Guarisco (Manager / Owner)		
American Vacuum (AV), located in Morgan City, LA, operates as a used oil transporter and transfer facility. AV has three vacuum trucks, one 130-barrel and two 110-barrel, where employees collect waste oil, bilge water, and used oil from customers before bringing it back to the facility for storage. The used oil is consolidated into tanks at AV and then transported to Clean Harbors in White Castle for disposal. AV has 10 storage tanks ranging in capacity from 7,000 gallons to 20,000 gallons. AV will also store fuel for customers. AV is registered with the EPA as a used oil transporter and used oil transfer facility under EPA ID LAR000053033. After the opening conference, the inspection team observed AV’s used oil storage operations. The inspection team first observed AV’s used oil storage tanks. At the time of the inspection, Tank 1 (Appendix 1 – Photo 1, left) was storing 7,000 gallons of used oil; Tank 2 (Appendix 1 – Photo 1, right) was storing 4,000 gallons of used oil; Tank 3 (Appendix 1 – Photo 2, middle) was storing 3,000 gallons of used oil; Tank 4 (Appendix 1 – Photo 2, left) was empty; Tank 5 (Appendix 1 – Photo 3, middle) was empty; and Tank 6 (Appendix 1 – Photo 3, left) was storing 3,000 gallons of used oil. All of the used oil tanks were labeled as used oil, but the labels had faded and were not clearly visible [AOC #1 – AV did not clearly label containers and aboveground tanks used to store used oil with the words “Used Oil” - 40 CFR 279.45(g)(1)]. Next to the used oil tank farm, AV had a 20,000-gallon frac tank, which was storing 6,000 gallons of used oil (see Appendix 1 – Photo 4). The frac tank was unlabeled and was not in a form of secondary containment, a requirement for used oil transfer facilities [AOC #2 – AV did have a secondary containment system for containers and an aboveground tank used to store oil at a transfer facility - 40 CFR 279.45(f)] and [AOC #1]. The inspection team observed fifteen full 55-gallon drums containing used oil-contaminated filters and PPE to the right of the tank farm (see Appendix 1 – Photos 5 to 7). Mr. Guillory stated the drums have been on site for 30 days. The drums were not labeled as used oil and were not in secondary containment [see AOC #1 and AOC #2]. Next, the inspection team observed two 20,000-gallon frac tanks that were storing diesel fuel for an AV customer (see Appendix 1 – Photos 8 to 11). The inspection team noticed the secondary containment wall for the tank farm was slightly damaged, and Mr. Guarisco stated that a truck damaged the wall on 3/25/2025, and there are repairs scheduled for 3/28/2025 (see Appendix 1 – Photo 12). Inside the AV maintenance shop, the inspection team observed 11 universal waste batteries that were not properly labeled, but Mr. Guillory stated these batteries have recently gone out of service (see Appendix 1 – Photos 13 and 14) [AOC #3 – AV did not label universal waste batteries (i.e., each battery), or a container in which the batteries are contained, with any one of the following phrases: “Universal Waste—Battery(ies),” or “Waste Battery(ies),” or “Used Battery(ies);” - 40 CFR 273.14(a)].			

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 3:40 PM with AV personnel. The AOCs were communicated during the closing. Following the inspection on 4/11/2025, Mr. Guarisco sent a follow-up email in response to the AOCs observed during the inspection, including:

- Photos of the tanks labeled as used oil, a receipt for the shipment of universal waste batteries, and secondary containment for the 55-gallon drums of used oil (Appendix 2)

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.

Facility: American Vacuum		
AOC #1 – AV did not clearly label containers and aboveground tanks used to store used oil with the words “Used Oil.”	Citation: 40 CFR 279.45(g)(1)	Section: 2.1
AOC #2 – AV did have a secondary containment system for containers and an aboveground tank used to store oil at a transfer facility.	Citation: 40 CFR 279.45(f)	Section: 2.1
AOC #3 – AV did not label universal waste batteries (i.e., each battery), or a container in which the batteries are contained, with any one of the following phrases: “Universal Waste—Battery(ies),” or “Waste Battery(ies),” or “Used Battery(ies).”	Citation: 40 CFR 273.14(a)	Section: 2.1

SECTION V – 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. 4/11/25 AV email – Mr. Guarisco provided the inspection team with photos of attempted corrections made towards AOCs observed.

SECTION VI – LIST OF APPENDICES

Appendix 1. Photograph Log

Appendix 2. AV Response on 4/11/2025

APPENDIX 1.
PHOTOGRAPH LOG



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Location: American Vacuum		
City: Morgan City	County/Parish: St. Mary	State: Louisiana



Photo No. 1

Photo File Name: DSCN7889

Date of Photo: 3/26/2025

Time of Photo: 1515 hrs.

Photographer: Vince Damiano

Description: View of used oil storage Tank #1 (left, holding 7,000 gallons) and used oil storage Tank #2 (right, holding 4,000 gallons) in the tank farm; neither tank is labeled.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Location: American Vacuum		
City: Morgan City	County/Parish: St. Mary	State: Louisiana



Photo No. 2

Photo File Name: DSCN7890

Date of Photo: 3/26/2025

Time of Photo: 1516 hrs.

Photographer: Vince Damiano

Description: View of used oil storage Tank #3 (middle left, holding 3,000 gallons) and used oil storage Tank #4 (middle right, empty) in the tank farm; neither tank is labeled.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Location: American Vacuum		
City: Morgan City	County/Parish: St. Mary	State: Louisiana



Photo No. 3

Photo File Name: DSCN7891

Date of Photo: 3/26/2025

Time of Photo: 1516 hrs.

Photographer: Vince Damiano

Description: View of used oil storage Tank #5 (left, empty) and used oil storage Tank #6 (right, holding 3,000 gallons) in the tank farm; neither is labeled.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Location: American Vacuum		
City: Morgan City	County/Parish: St. Mary	State: Louisiana



Photo No. 4

Photo File Name: DSCN7892

Date of Photo: 3/26/2025

Time of Photo: 1516 hrs.

Photographer: Vince Damiano

Description: View used oil frac tank storing 6,000 gallons of used oil; the tank is unlabeled and not in a secondary containment system.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Location: American Vacuum		
City: Morgan City	County/Parish: St. Mary	State: Louisiana



Photo No. 5

Photo File Name: DSCN7893

Date of Photo: 3/26/2025

Time of Photo: 1517 hrs.

Photographer: Vince Damiano

Description: View of three of the fifteen 55-gallon drums storing used oil-contaminated solids that were unlabeled and not in a secondary containment system, observed to the right of the tank farm.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Location: American Vacuum		
City: Morgan City	County/Parish: St. Mary	State: Louisiana



Photo No. 6

Photo File Name: DSCN7894

Date of Photo: 3/26/2025

Time of Photo: 1517 hrs.

Photographer: Vince Damiano

Description: View of three more of the fifteen 55-gallon drums storing used oil-contaminated solids that were unlabeled and not in a secondary containment system, observed to the right of the tank farm.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Location: American Vacuum		
City: Morgan City	County/Parish: St. Mary	State: Louisiana



Photo No. 7

Photo File Name: DSCN7895

Date of Photo: 3/26/2025

Time of Photo: 1517 hrs.

Photographer: Vince Damiano

Description: View of tarp covering the other nine of the fifteen 55-gallon drums storing used oil-contaminated solids that were unlabeled and not in a secondary containment system, observed to the right of the tank farm.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Location: American Vacuum		
City: Morgan City	County/Parish: St. Mary	State: Louisiana



Photo No. 8

Photo File Name: DSCN7896

Date of Photo: 3/26/2025

Time of Photo: 1519 hrs.

Photographer: Vince Damiano

Description: View of a 20,000-gallon frac tank storing diesel fuel located in the front of the property.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Location: American Vacuum		
City: Morgan City	County/Parish: St. Mary	State: Louisiana



Photo No. 9

Photo File Name: DSCN7897

Date of Photo: 3/26/2025

Time of Photo: 1519 hrs.

Photographer: Vince Damiano

Description: View of the second 20,000-gallon frac tank storing diesel fuel located in front of the property.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Location: American Vacuum		
City: Morgan City	County/Parish: St. Mary	State: Louisiana



Photo No. 10

Photo File Name: DSCN7898

Date of Photo: 3/26/2025

Time of Photo: 1519 hrs.

Photographer: Vince Damiano

Description: View of both 20,000-gallon frac tanks storing diesel fuel located in the front of the property.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Location: American Vacuum		
City: Morgan City	County/Parish: St. Mary	State: Louisiana



Photo No. 11

Photo File Name: DSCN7899

Date of Photo: 3/26/2025

Time of Photo: 1519 hrs.

Photographer: Vince Damiano

Description: View of both 20,000-gallon frac tanks storing diesel fuel located in the front of the property.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Location: American Vacuum		
City: Morgan City	County/Parish: St. Mary	State: Louisiana



Photo No. 12

Photo File Name: DSCN7900

Date of Photo: 3/26/2025

Time of Photo: 1522 hrs.

Photographer: Vince Damiano

Description: View of damage sustained to the tank farm secondary containment wall.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Location: American Vacuum		
City: Morgan City	County/Parish: St. Mary	State: Louisiana



Photo No. 13

Photo File Name: DSCN7901

Date of Photo: 3/26/2025

Time of Photo: 1526 hrs.

Photographer: Vince Damiano

Description: View of 11 universal waste batteries located in the maintenance area that were not labeled.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Location: American Vacuum		
City: Morgan City	County/Parish: St. Mary	State: Louisiana



Photo No. 14

Photo File Name: DSCN7902

Date of Photo: 3/26/2025

Time of Photo: 1526 hrs.

Photographer: Vince Damiano

Description: View of 11 universal waste batteries located in the maintenance area that were not labeled.

APPENDIX 2. AV RESPONSE ON 4/11/2025

Re: Follow-Up from EPA Inspection on 3/26/2025

From Linda Thibodeaux <americanvacuum1@gmail.com>

Date Fri 4/11/2025 5:55 PM

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

 5 attachments (1,018 KB)

IMG_9070.jpeg; IMG_9089.jpeg; IMG_9088.jpeg; IMG_9069.jpeg; IMG_9090.jpeg;

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

Vince,

We completed the list of changes you requested. I attached 5 pics of the changes.

Thanks,

Rob Guarisco

American Vacuum

985-397-6404 Cell

985-384-6400 Phone

985-385-1888 Fax

On Wed, Mar 26, 2025 at 5:16 PM Vince Damiano <Vince.Damiano@erg.com> wrote:

Hello Rob,

I am following up with a list of items and notes from our inspection today. Below are initial Areas of Concern and items requested; you may follow up with pictures, write-ups, sample results, or however you see fit:

- Unlabeled used oil storage tanks and frac tank
- Unlabeled used oil 55-gallon drums (these are the oily waste solids that contain used oil)
- As a used oil transfer facility, no secondary containment for a used oil frac tank and 55-gallon drums
- Universal waste batteries were not labeled and had no accumulation start date

Again, thank you for taking the time out of your day to meet with us. Please let us know if you have any questions or concerns.

Thanks,

Vince

 **Vince Damiano**









Studdard Scrap Metal
531 Highway 182 East
Morgan City, LA 70380

Purchase Ticket #33652 | PAID

Operator: milch
Time of Arrival: 11:51 AM, 03/27/2025
PAID: 11:53 AM, 03/27/2025
Customer: LARRY GUILLORY
Address: 136 SHADY GROVE
PATTERSON, LA 70392-0000
License Plate: ---
Drivers License #: 006340334
Payment Type: Cash

NOTES

Materials

	G	T	Adj	Net	Value
1. BATTERY (\$0.100/LBS)					
	650	0	---	650	\$65.00
Total	650	0	---	650	\$65.00
Truck Total	0	0		0	

Customer Signature

Accepted []

Disclaimer

I hereby certify that I have the right to possess and sell this scrap. This is a Bill of Sale to the above described scrap. I hereby acknowledge payment in full.
Thank you for your business!
Please come again.
MONDAY-FRIDAY 8 AM - 4 PM
ALL COPPER CHECKS CAN BE CASHED UP AFTER 5 BUSINESS DAYS!

