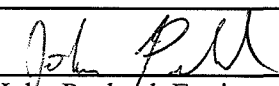




EPA REGION 6 ENFORCEMENT DIVISION INSPECTION REPORT

FRS #:	110003265662		
Media #:	LAD000132167		
Permit #:			
Inspection Type:	Resource Conservation and Recovery Act, Compliance Evaluation Inspection		
Inspection Date:	March 18-20, 2014		
Company Name:	T. T. BARGE SERVICES, LLC.		
Facility Name:	T. T. BARGE SERVICES, LLC. – MILE 237		
Physical Location:	5190 North River Road		
	Port Allen, Louisiana 70767		
Mailing Address:	19368 Highway 36		
	Covington, Louisiana 70433		
County/Parish:	West Baton Rouge Parish		
SIC Code:	4499		
NAICS Code:	48839		
Regulatory Programs	RCRA: Large Quantity Generator		
Facility Representatives:	Mark Toepfer	President – T. T. Barge Services, LLC	225-473-8222
	David Hernandez	EH&S Manager – T. T. Barge Mile 237	225-267-4505
	Cory Womack	Yard Manager – T. T. Barge Mile 237	225-267-4505
	Chad V. Scott, PE	MCL Environmental Engineering Solutions	222-751-7228
	Chris Scott	Compliance Officer- Marine Chemist of LA	
EPA Inspector:	John Penland	6EN-HE Environmental Scientist	214-665-9717
State Inspectors:	Daniel J. Cheatham	LDEQ Capital Region Environmental Scientist	225-219-3026
EPA Lead Inspector			6/2/2014
Signature/Date	John Penland, Environmental Scientist		{Date}
Peer Reviewer			6/2/2014
Signature/Date:	Joyce Johnson, Environmental Protection Specialist		{Date}
Supervisor			6/2/14
Signature/Date	Guy Plamondon, Chief – Hazardous Waste Enforcement Section		{Date}



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Signature/Date	John Penland, Environmental Scientist		{Date}
Peer Reviewer			
Signature/Date:	Joyce Johnson, Environmental Protection Specialist		{Date}
Supervisor			
Signature/Date	Guy Tidmore, Chief – Hazardous Waste Enforcement Section		{Date}

Section I - INTRODUCTION

PURPOSE OF THE INSPECTION

At 9:30 am on March 18, 2014, I, EPA Region 6 inspector John Penland, and Louisiana Department for Environmental Quality (LDEQ) inspector Daniel Cheatham arrived at the T. T. Barge Services, LLC – Mile 237 facility (the facility) for an unannounced compliance evaluation inspection. I presented my credentials to Mr. David Hernandez, the facility Environmental, Health, & Safety manager, and informed him that this was an EPA inspection to determine compliance with the Resource Conservation and Recovery Act (RCRA). The inspection included a review of the facility's waste determination process, direct observation of the waste management units, and a review of the facility's records in order to evaluate the compliance of the facility with the hazardous waste generator requirements of RCRA.

This report serves as documentation of the onsite activities and observations as they pertain to the RCRA CEI. Photographs taken during the inspection to document onsite observations are included as Appendix 1.

FACILITY DESCRIPTION¹

The T. T. Barge Services, LLC – Mile 237 facility cleans and repairs barges at a location north of Port Allen, W. Baton Rouge Parish, Louisiana in the batture of the Mississippi River. The facility, formerly known as Tiger Shipyard, Inc., has been in operation since 1987. The facility is comprised of two separate operational areas located approximately one-quarter mile apart. The facility currently has approximately 17 employees who work in two shifts between the hours of 7:00 am to 6:30 pm local time. They also employ either current or former employees to provide 24 hour security.

The barge cleaning area is comprised of five moored barges:

- Office Barge – A dock barge which serves as the site of the Yard Managers office, the caustic storage tank, and a diesel storage tank.
- Gas Free-1 – A dock barge which serves as the primary work barge for the gas freeing process. The units located on the barge include vacuum pumps and product storage tanks.
- TT-3 – a three compartment tank barge located north of the Office Barge, with a total capacity of approximately 307,658 gallons, used for wash water storage.
- DM 907 – a twenty-eight compartment tank barge with a total storage capacity of 430,826 gallons, previously used for wash water and product storage. This barge was taken out of service at the end of 2012, but still contains material from its previous service. According to Mark Toepfer, this barge will be scrapped when empty.
- CHEM 94 – a three compartment tank barge with a total storage capacity of 448,134 gallons, previously used for the storage of wash water. This barge was

¹ Appendix 2 – Facility Maps and Diagrams

taken out of service in the middle of 2012, but still contains material from its previous service. According to Mark Toepfer, this barge will be converted into a dock barge when empty.

- DM 365 – a dock barge equipped with three above deck product storage tanks. This barge was taken out of service at the end of 2012 and the tanks have been fully cleaned and empty. According to Mark Toepfer, the tanks will be removed and this barge will be brought back into service as a dock barge.

Two container storage areas, a hydrocarbon vapor combustor, and the natural gas fired boiler all reside on the batture. Barges arrive at the cleaning area to be gas-freed and/or cleaned. Heels and gases are pumped out and fluids stored for offsite recycling or classified as waste and accumulated onsite prior to being shipped for treatment or disposal offsite. Waste is stored in compartments on the moored barges or in containers onshore.

Repairs and maintenance procedures are completed in the repair dock area which is located west of the cleaning area. The Barge repair and maintenance services are performed on moored vessels using equipment located on several work barges, including the DM 4902 (Office Barge), the IC 1 (Work Barge), the DM 4503 (Work Barge), the DM 349 (Work Barge), the LTC 60 (Work Barge), the DM 1701 (Work Barge), and the DM 360 (Work Barge). There are also three dry docks at the facility: DD-1, DD-2, and DD-3. Typical repairs include removal and replacement of worn or damaged pipes, valves, pumps, structural supports, or other relatively small barge parts. Welding and cutting equipment required for these mechanical and structural repairs is maintained in the Office Barge area. Barges are repaired once they have been gas-freed and certified safe by a marine chemist.

According to its annual hazardous waste reports², the facility is a large quantity generator of hazardous waste and a hazardous waste transporter. These reports indicate that the facility's annual generation of hazardous waste is greater than 3 million pounds and includes: benzene contaminated wash waters (D018), caustic soda solution (D002), and flammable wash waters (D001).

WASTE MANAGEMENT

The facility generates batches of wash water during wet, barge cleaning processes which occur after heels have been removed and a barge has been made gas-free. These wash waters accumulate within the compartment being cleaned. The wash waters are then pumped into a series of containers for processing based on their classification as either hazardous or non-hazardous. These processes are functionally identical and consist of one portable, roll-off container, which serves as a settling box for solids, and a portable, frac tank (container), which serves to separate any oils from the wash water. In each step the wash waters are transferred using portable pumps and flexible hoses directly through the open hatches of the container.

Since the facility is located within the batture of the Mississippi River, it is subject to periodic flooding due to high river levels. During these periods of high water, the wash water management containers, which are located on shore, must be removed and wash waters are

² Appendix 3 – Annual Hazardous Waste Reports

pumped into compartments on moored barges for storage until the waters recede. Currently Barge TT3 serves as the wash water storage barge. Though this barge is currently moored in place, it could potentially be used for transportation given the proper certifications and could, therefore, be classified as a container under RCRA.

RECENT FACILITY COMPLIANCE HISTORY

In September of 2012, a RCRA compliance inspection of the facility was conducted by Eva Steele (USEPA Region 6). In her inspection report, Ms. Steele identified a number of areas of concern at the time of the inspection. These concerns included:

- Potential storage of hazardous waste in containers onsite for a period of time greater than 90 days without a permit.
- Potential storage of hazardous waste in containers which are unfit for service
- Potential storage of hazardous waste in containers which are unmarked
- Potential storage of hazardous waste in containers which are open
- Potential discharge of hazardous waste to the Mississippi River.
- Failure to maintain an updated contingency plan

Section II – INSPECTION DETAILS & OBSERVATIONS

WASTE DETERMINATION

The barge cleaning process generates batches of contaminated wash waters which are determined to be hazardous or non-hazardous wastes based on the facility's knowledge of the barge contents prior to cleaning. This determination is made by Cory Womack, Yard Manager, in conjunction with Chris Scott, Marine Chemist. A job sheet is prepared for each customer barge serviced by the facility. The information documented in this job sheet includes: the barge designation, the barge's arrival date at the facility, the customer name, the barge's last known cargo, the barge's next anticipated cargo, the type of service to be performed on the barge, and whether the job created a wash water. However, the job sheet does not specify the how this wash water was managed after its generation. Therefore, on March 19, 2014, I reviewed the job sheets for each barge that had been cleaned at the facility since January 1, 2014 in order to determine whether the wash waters generated during each cleaning were hazardous or non-hazardous. This review was conducted with participation by Mark Toepfer, David Hernandez, Cory Womack, Chad Scott, and Chris Scott (by phone) in attendance. In each case Chris Scott and Cory Womack provided a statement declaring whether the wash waters generated during the cleaning were hazardous or non-hazardous. Their declarations are summarized in the Table 1.

Table 1 - Hazardous Waste Declarations for Wash Waters Generated During Barge Cleaning

Barge Contents	Regulatory Status of Wash Waters
Toluene	Managed as hazardous, claimed as potentially non-hazardous
Olefin – C12	Non-hazardous
Olefin – C10	Non-hazardous
Methanol	Managed as hazardous, potentially D001
BTX	Managed as hazardous, D018

Tetramer	Non-hazardous
Ethanol	Managed as non-hazardous, potentially D001 but highly dilute
Styrene	Non-hazardous
Pygas	Managed as hazardous, D018
Cumene	Non-hazardous
Biodiesel	Non- hazardous
Butyl Cellosolve (Ethylene Glycol mono-Butyl Ether)	Managed as hazardous, claimed as non-hazardous
Linear Alky Benzene	Managed as hazardous, D001
Naptha	Non-hazardous
Isopropyl Alcohol	Managed as hazardous, D001
Reformate	Managed as hazardous, D018
Methyl Ethyl Ketone	Managed as hazardous, D001 D035
C5 cut Pentadiene	Managed as hazardous, claimed as potentially non-hazardous
Asphalt	Non-hazardous
Natural Gasoline	Managed as hazardous, D018
Gasoline	Managed as hazardous, D018
Acetone	Non-hazardous
N-butanol	Managed as hazardous, D001
Carbitol	Managed as hazardous, D001

A database containing the full collection of job sheets for the facility was collected during the inspection for later review. This database has been claimed as Confidential Business Information (CBI) by the facility due to the presence of customer details.

Another aspect of this review revolved around a discussion of the point of generation and regulatory status for the wash water waste streams. According to Mark Toepfer and Chad Scott, the facility does not consider the wash waters to be wastes until they have been removed from the facility's wash water management containers for shipment to an offsite disposal facility. According to Mr. Toepfer, some, but not all, of the wash waters contain recoverable amounts of petroleum which is separated during the wash water management process and sold as a refinable product.

According to, 70 Federal Register 57779, wash waters from container cleaning operations are subject to full regulation under Subtitle C if the removal or subsequent management of the residue generates a new hazardous waste that exhibits any of the characteristics identified in Part 261, Subpart C. The relevant exception to this that may apply to the wash waters generated from the cleaning of containers used for the transportation of materials within the petroleum production and refining process is the "recovered oil exclusion" which is codified at 40 CFR 261.4(a)(12)(ii). However, the facility does not take any steps to segregate these petroleum-related wash waters from their other hazardous wash waters. Consequently, the hazardous wash waters and each unit employed for their management would be subject to regulation under RCRA.

INSPECTION OBSERVATIONS

On March 18, 2014, Daniel Cheatham and I physically inspected the T. T. Barge waste management units. We were accompanied on this inspection by Mr. David Hernandez, Mr. Cory Womack, and Mr. Chad Scott.

Frac Tanks³

We began our review with the two, 20,000 gallon capacity, wash water frac tanks. These containers were staged on the soils of the batture within a temporary, secondary containment. One of the frac tanks was being used for the storage of hazardous wash waters and had a hazardous waste label affixed to it. This label, however, was not marked with the date when the accumulation of the waste began. Wastes are transferred into the containers through open hatches in the top of the containers using flexible hoses. At the time of this inspection, the hatches on the containers were open with the hoses left in the containers. Waste was being transferred into the non-hazardous waste container but waste was not being added to the hazardous waste container. After I informed the facility representatives that this could be an area of concern, they closed the hatch on the afternoon of March 18, 2014. On March 20, 2014, Mr. Hernandez stated that the frac tank had last been emptied, with the solids removed, on January 15, 2014.

Roll-off Containers⁴

The two roll-off containers used for gravity separation of solids from the wash waters are located in a sloped, concrete-lined area adjacent to the frac tanks. At the time of this inspection one of the roll-off containers was used for the management of hazardous wash water. This roll-off container had a hazardous waste label affixed to it. This label, however, was not marked with the date when the accumulation of the waste began. Wastes are transferred into the containers through open covers in the top of the containers using flexible hoses. At the time of this inspection, the covers on the containers were open with the hoses left in the containers. Waste was being transferred from the non-hazardous waste container but waste was not being added to or removed from the hazardous waste roll-off container. After I informed the facility representatives that this could be an area of concern, they closed the top of the container on the afternoon of March 18, 2014. On March 18, 2014, I observed an accumulation of solid sludge-like material beneath and around the hazardous waste roll-off container. This material resembled the contents of the container. On March 19, 2014, I observed that these materials were still present. Therefore, I requested that the facility not remove them until I had collected a sample for analysis. On March 20, 2014, I collected a sample of this material and sent it to the EPA Region 6 laboratory in Houston, Texas for analysis in order to determine whether the material demonstrated any of the characteristics of a hazardous waste. The final laboratory report is included as Appendix 4.

Storage Barges⁵

For each of the storage barges (CHEM 94, TT3, and DM907) we visited the barge and asked for the contents of each storage compartment. In addition we requested that the facility

³ Appendix 1– Inspection Photographs – Photos 5-9, 41

⁴ Appendix 1– Inspection Photographs – Photos 10-18, 42, 46-49

⁵ Appendix 1– Inspection Photographs – Photos 36 and 37

provide inventory sheets documenting the contents of the barges since 2011. These inventory sheets are provided as Appendix 5.

CHEM 94 – At the time of this inspection CHEM 94 had been out of service for more than 18 months. According to a statement made by Mr. Cory Womack on March 18, 2014, the barge had not been emptied of sludges when it was taken out of service. According to a statement by the facility representatives on March 20, 2014, the barge had least been emptied with sludges removed in 2010. According to Mr. Mark Toepfer, the last inventory conducted on this barge prior to being taken out of service was recorded on April 2, 2012. On March 18, 2014, I requested that the facility provide me the quantity and description of the current contents of each of the three compartments of CHEM 94. In response Mr. Cory Womack manually gauged each compartment and provided the depth measurement and a description of the contents. Using the compartment specific gauging tables provided by the facility, I converted these depth measurements into the corresponding approximate volumes. At the time of this inspection the compartment contents were as follows :

CHEM 94 Compartment # 1 - approximately 1,860 gallons of sludge. Previous contents listed on the April 2, 2012 inventory are 7,059 gallons of “Non-hazardous Sludge/Rust”.

CHEM 94 Compartment # 2 – approximately 9,030 gallons of sludge. The atmosphere of the compartment was measured as being at 20% of the lower explosive limit indicating the presence of volatile organic compounds. Previous contents listed on the April 2, 2012 inventory are 46,712 gallons of “Hazardous Wash Water” and 2,300 gallons of “Dirty BTX”

CHEM 94 Compartment # 3 – approximately 4,710 gallons of sludge. Previous contents listed on the April 2, 2012 inventory are 37,722 gallons of “Hazardous Wash Water” and 1,855 gallons of “Dirty BTX”

TT3 – At the time of this inspection TT3 was the active storage barge for wash waters generated by the barge cleaning process. According to a statement made by facility representatives on March 20, 2014, the barge had last been emptied with sludges removed on January 12, 2012. According to a statement made by Mr. Cory Womack on March 18, 2014, wash waters had last been loaded into the barge between two and three months prior to this inspection. On March 18, 2014, I requested that the facility provide me the quantity and description of the current contents of each of the three compartments of TT3. In response Mr. Cory Womack manually gauged each compartment and provided the depth measurement and a description of the contents. Using the compartment specific gauging tables provided by the facility, I converted these depth measurements into the corresponding approximate volumes. At the time of this inspection the compartment contents were as follows :

TT3 Compartment # 1 – approximately 4,260 gallons of non-hazardous wash water.

TT3 Compartment # 2 – approximately 5,543 gallons of non-hazardous wash water.

TT3 Compartment # 3 – approximately 4,308 gallons of hazardous wash water. At the time of this inspection the hatch for this compartment was open with the hose used to add and remove wash waters left partially inside the compartment. After I informed Mr. Womack that this could potentially be an area of concern, he closed the hatch and secured it.

DM907 – At the time of this inspection DM907 had been out of service for more than 15 months. According to a statement made by Mr. Cory Womack on March 18, 2014, no materials had been added to the barge since it was taken out of service and the last time material had been removed from the barge was at least six months prior to this inspection. Time did not permit a full inventory of the barge to be taken during this inspection on March 18, 2014. However, on March 19, 2014, facility representatives stated that the current contents of the barge were reflected on the inventory taken on June 20, 2013. The last inventory provided that predates the time when the barge was allegedly taken out of service is dated April 2, 2012. Based on the June 20, 2013 inventory, at the time of this inspection the compartment contents were as follows:

DM907 Compartment # 1 – approximately 1,849 gallons of “Rust” and 693 gallons of unspecified material. Previous contents listed on the April 2, 2012 inventory are puddles of “Non-Haz Wash Water”.

DM907 Compartment # 2 – approximately 1,953 gallons of “Rust” and 9,636 gallons of unspecified material. Previous contents listed on the April 2, 2012 inventory as puddles of “Non-Haz Wash Water”.

DM907 Compartment # 3 – approximately 3,627 gallons of “Rust” and 6,193 gallons of unspecified material.
Previous contents listed on the April 2, 2012 inventory as “Hazardous Solids”

DM907 Compartment # 4 – approximately 1,001 gallons of “Styrene Polymer”.
Previous contents listed on the April 2, 2012 inventory as “Contains some styrene polymer”.

DM907 Compartment # 5 – approximately 5,563 gallons of “Rust” and 696 gallons of unspecified material. Previous contents listed on the April 2, 2012 inventory as puddles of “Non-Haz Wash Water”.

DM907 Compartment # 6 – approximately 4,532 gallons of unspecified material.
Previous contents listed on the April 2, 2012 inventory as 1,040 gallons of “STY/BTX mixture”.

DM907 Compartment # 7 – approximately 2,714 gallons of “Rust” and 1,206 gallons of unspecified material. Previous contents listed on the April 2, 2012 inventory as puddles of “Non Haz Wash Water”

DM907 Compartment # 8 – approximately 10,217 gallons of unspecified material. Previous contents listed on the April 2, 2012 inventory as “Clean Tank”

DM907 Compartment # 9 – approximately 9,111 gallons of unspecified material. Previous contents listed on the April 2, 2012 inventory as puddles of “Non Haz Wash Water”

DM907 Compartment # 10 – approximately 310 gallons of “Rust” and 5,049 gallons of unspecified material. Previous contents listed on the April 2, 2012 inventory as 4,117 gallons of “Haz water” and 1,243 gallons of “Oil”

DM907 Compartment # 11 – approximately 7,463 gallons of “Rust” and 777 gallons of unspecified material. Previous contents listed on the April 2, 2012 inventory as “Haz Solids”

DM907 Compartment # 12 – approximately 10,514 gallons of unspecified material. Previous contents listed on the April 2, 2012 inventory as 1,435 gallons of “Alcohol Wash Water”

DM907 Compartment # 13 – approximately 1,403 of “Rust” and 11,804 gallons of unspecified material. Previous contents listed on the April 2, 2012 inventory as “Empty”

DM907 Compartment # 14 – approximately 4,104 gallons of “Rust” and 5,932 gallons of unspecified material. Previous contents listed on the April 2, 2012 inventory as 5,590 gallons of “Haz Wash Water” and 342 gallons of “Oil”

DM907 Compartment # 15 – approximately 686 gallons of “Rust” and 12,235 gallons of unspecified material. Previous contents listed on the April 2, 2012 inventory as 3,888 gallons of “Hazardous Wash Water” and 229 gallons of “Oil”

DM907 Compartment # 16 – “Clean Tank”. Previous contents listed on the April 2, 2012 inventory as “Clean Tank”

DM907 Compartment # 17 – approximately 1,413 gallons of “Rust” and 4,237 gallons of unspecified material. Previous contents listed on the April 2, 2012 inventory as puddles of “Ethanol/Oil”

DM907 Compartment # 18 – approximately 4,118 gallons of “Rust” and 1,830 gallons of unspecified material. Previous contents listed on the April 2, 2012 inventory as puddles of “Dirty BTX”

DM907 Compartment # 19 – approximately 11,022 gallons of “Rust” and an unspecified quantity of “Mold”. Previous contents listed on the April 2, 2012 inventory as 6,889 gallons of “Haz Wash Water”

DM907 Compartment # 20 – approximately 7,038 gallons of “Rust” and 5,751 gallons of unspecified material. Previous contents listed on the April 2, 2012 inventory as 5,870 gallons of “Haz Wash Water”

DM907 Compartment # 21 – “Clean Tank”. Previous contents listed on the April 2, 2012 inventory as “Clean Tank”

DM907 Compartment # 22 – approximately 2,833 gallons of “Rust” and 12,277 gallons of unspecified material. Previous contents listed on the April 2, 2012 inventory as 9,325 gallons of “Haz Wash Water”

DM907 Compartment # 23 – approximately 7,217 gallons of “Rust” and 3,249 gallons of unspecified material. Previous contents listed on the April 2, 2012 inventory as 3,610 gallons of “Haz Wash Water”

DM907 Compartment # 24 – “Clean Tank”. Previous contents listed on the April 2, 2012 inventory as “Clean Tank”

DM907 Compartment # 25 – “Mold and Buckets (Molasses)”. Previous contents listed on the April 2, 2012 inventory as “Clean Tank”

DM907 Compartment # 26 – approximately 4,307 gallons of “Rust” and 1,917 gallons of unspecified material. Previous contents listed on the April 2, 2012 inventory as 13,046 gallons of “Haz Wash Water”

DM907 Compartment # 27 – “Clean Tank”. Previous contents listed on the April 2, 2012 inventory as “Clean Tank”

DM907 Compartment # 28 – approximately 1,476 gallons of “Rust” and 983 gallons of unspecified material. Previous contents listed on the April 2, 2012 inventory as puddles of “Non-Haz Wash Water”

Ancillary Equipment⁶

On March 18, 2014, I observed the transfer of non-hazardous wash waters from the non-hazardous wash water roll-off container to the non-hazardous wash water frac tank using a portable pump. During this transfer a leak from the pump was generating a steady stream of liquids which flowed into the sloped concrete containment area where the containers are located. According to a statement made by Mr. Cory Womack on March 18, 2014, this same pump is also used for the transfer of hazardous wash waters.

Document Review

On March 20, 2014, we reviewed the documents maintained by the facility to demonstrate compliance with the recordkeeping requirements of RCRA for LQGs. This review encompassed the facility’s records of employee training, contingency plans, hazardous waste

⁶ Appendix 1 – Inspection Photographs – Photos 15-17

manifests, and annual waste reports. I did not identify any immediate concerns with the employee training records, annual waste reports, or contingency plan. However, twelve hazardous waste manifests issued in 2013 for hazardous waste shipments designated for Lonestar Ecology in Pasadena, Texas were not completed by T. T. Barge Services prior to shipment⁷. Excerpts of these documents were collected as part of this inspection for further review.

⁷ Appendix 6 – Selected Hazardous Waste Manifests

Section III – AREAS OF CONCERN

	<i>Areas of Concern</i>	<i>Documentation</i>	<i>Regulatory References</i>	<i>Comments</i>
1	Operation of a Hazardous Waste Storage Unit Without a Permit – Barge TT3	Attachment 5	40 CFR 270.1 LAC 33:V.303.B	Storage of hazardous waste in barge TT3 without meeting the permit exemption requirements
1a	Failure to label containers used for the storage of hazardous waste with the words “Hazardous Waste”		40 CFR 262.34(a)(3) LAC 33:V.1109.E.1.d	There were no markings present to indicate that TT3 was in hazardous waste service
1b	Failure to label containers used for the storage of hazardous waste with the date of accumulation of the waste		40 CFR 262.34(a)(2) LAC 33:V.1109.E.1.c	There were no markings present to indicate when the accumulation of the hazardous waste stored in TT3 began
1c	Unpermitted storage of a hazardous waste for a period greater than 90 days		40 CFR 262.34 LAC 33:V.1109.E.1	According to statements made by facility representatives, the compartments of TT3 had not been rendered empty since January 12, 2012.
1d	Failure to close containers used for the storage of a hazardous waste	Attachment 1 – Photos 36, 37	40 CFR 262.34(a)(1)(i); 40 CFR 265.173(a); LAC 33:V.1109.E.1.a.i; LAC 33:V.2107.A	At the time of this inspection the hatch for Compartment #3 was open when waste were not being added or removed.
2	Operation of a Hazardous Waste Storage Unit Without a Permit – Barge CHEM94	Attachment 5	40 CFR 270.1 LAC 33:V.303.B	Storage of hazardous waste in barge CHEM94 without meeting the permit exemption requirements
2a	Failure to label containers used for the storage of hazardous waste with the words		40 CFR 262.34(a)(3) LAC 33:V.1109.E.1.d	There were no markings present to indicate that

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	“Hazardous Waste”			CHEM94 was in hazardous waste service
2b	Failure to label containers used for the storage of hazardous waste with the date of accumulation of the waste		40 CFR 262.34(a)(2) LAC 33:V.1109.E.1.c	There were no markings present to indicate when the accumulation of the hazardous waste stored in CHEM94 began
2c	Unpermitted storage of a hazardous waste for a period greater than 90 days		40 CFR 262.34 LAC 33:V.1109.E.1	According to statements made by facility representatives, the compartments of CHEM94 had not been rendered empty since 2010.
3	Operation of a Hazardous Waste Storage Unit Without a Permit – Barge DM907	Attachment 5	40 CFR 270.1 LAC 33:V.303.B	Storage of hazardous waste in barge DM907 without meeting the permit exemption requirements
3a	Failure to label containers used for the storage of hazardous waste with the words “Hazardous Waste”		40 CFR 262.34(a)(3) LAC 33:V.1109.E.1.d	There were no markings present to indicate that DM907 was in hazardous waste service
3b	Failure to label containers used for the storage of hazardous waste with the date of accumulation of the waste		40 CFR 262.34(a)(2) LAC 33:V.1109.E.1.c	There were no markings present to indicate when the accumulation of the hazardous waste stored in DM907 began
3c	Unpermitted storage of a hazardous waste for a period greater than 90 days		40 CFR 262.34 LAC 33:V.1109.E.1	According to statements made by facility representatives, the compartments of DM907 had not been rendered empty.
4	Failure to complete the hazardous waste manifest	Attachment 6 Manifest #'s:	40 CFR 262.20(a)(1) LAC 33:V.1107.B	Twelve hazardous waste manifests

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		006100601FLE 005795798JJK 005260342FLE 005803495JJK 005803477JJK 005803487JJK 005803478JJK 005803486JJK 005260350FLE 005803488JJK 005795843JJK 005795842JJK		issued in 2013 for hazardous waste shipments designated for Lonestar Ecology in Pasadena, Texas were not completed by T. T. Barge Services prior to shipment
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