

INSPECTION REPORT

Inspection Entry Date/Time	6/5/2024 2:45 PM (CT)	Announced: No		
Inspection Exit Date/Time	6/5/2024 3:30 PM (CT)	Access: Granted		
Regulatory Program	RCRA			
Type of Inspection	Focused Compliance Inspection (FCI)			
Facility or Site Name	Tri-State Environmental, LLC			
Facility/Site Identifier	LAR000103140			
Facility/Site Physical Address	512 Dudley Bernard Rd			
City, State, Zip Code	Golden Meadow, LA 70357			
County/Borough	Lafourche Parish			
Generator Status	Non-generator			
NAICS	488310, 213112			
Type of Operation	Tri-State Environmental, LLC provides cleaning services for stationary equipment at Port Fourchon and loads supplies onto vessels for tenants renting dock space from it.			
Geographic Coordinates	29.137588, -90.207553			
Additional Persons Participating in Inspection:				
Name	Title	Organization	Email	Phone
Joyce Johnson	Inspector	EPA REGION 6	Johnson.Joyce-r6@epa.gov	(214) 665-8548
Dedriel Gardner	Inspector	EPA REGION 6	Gardner.Dedriel@epa.gov	(281) 983-2133
Neil Rapp	Contractor	Eastern Research Group (ERG)	Neil.Rapp@erg.com	(480) 450-6517
Lead Inspector:				
Vince Damiano				
	ERG		Vince.Damiano@erg.com	(703) 835-6281

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

Type of inspection: Focused Compliance Inspection (FCI)

Port Fourchon 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 maintaining 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 verbal or written statements made during or after the on-site inspection, and materials shown, demonstrated, or submitted to the EPA during or after the on-site inspection. In addition, information gathered prior to or after the inspection from a review of EPA, State, and public records may be included in this report.

Attendees

Title/Organization	Name	Phone	Email	Opening Conf.	Closing Conf.
Lead Inspector/ Contactor/ERG	Vince Damiano	(703) 835-6281	Vince.Damiano@erg.com	Yes	Yes
RCRA Inspector/ Contractor/ERG	Neil Rapp	(480) 450-6517	Neil.Rapp@erg.com	Yes	Yes
Inspector/Enforcement Officer/EPA Region 6	Joyce Johnson	(214) 665-8548	Johnson.Joyce-r6@epa.gov	Yes	Yes
Inspector/Enforcement Officer/EPA Region 6	Dedriel Gardner	(281) 983-2133	Gardner.Dedriel@epa.gov	Yes	Yes

Tenant/Area	Inspection Date	Process Description	Areas of Concern
Tri-State Environmental, LLC	06/05/24	Tri-State Environmental, LLC (Tri-State) provides cleaning services for stationary equipment at the port. However, Tri-State only provides the cleaning crew for these services, and all waste is managed by its customers at their own facilities. Tri-State also leases space in its yard and dock to two tenants, Walter Oil & Gas and Petrifac. Tri-State loads supplies (i.e., water, groceries, chemicals) onto vessels for Walter Oil & Gas's offshore rigs and offloads domestic trash for tenants at its dock space. The company loads the domestic trash directly into dumpsters, which are managed by the tenants. Tri-State does not receive any waste besides municipal trash. Tri-State is a non-generator of hazardous waste. Facility personnel stated that Tri-State maintains a MARPOL COA for Annex V.	No

SECTION II – OBSERVATIONS

Tenant: Tri-State Environmental, LLC			
Section: 2.1	Date: 6/5/2024, 2:45 P.M.	Contains AOC: No	Contains CBI: No
Lead Inspector: Vince Damiano		Attendees: Michael Joiner (Manager), Scott Carter (Operations), Ron Johnson (Crane/Dispatch)	
Mr. Joiner provided the inspection team with a summary of operations at Tri-State. The company provides cleaning services for stationary equipment at Port Fourchon. However, Tri-State only provides the cleaning crew for these services, and all waste is managed by its customers at their own facilities. Mr. Joiner stated that no waste is transported back to Tri-State for disposal. Mr. Joiner added that Tri-State planned to enter the waste transportation business and had recently submitted its notification to EPA to register as a used oil transporter. Tri-State also leases space in its yard and dock to two tenants, Walter Oil & Gas and Petrifac. Tri-State loads supplies (i.e., water, groceries, chemicals) onto vessels for Walter Oil & Gas’s offshore rigs and offloads domestic trash for tenants at its dock space. Tri-State places the domestic trash directly into dumpsters, which are managed by the tenants. Mr. Joiner stated that Tri-State maintains a MARPOL COA for Annex V and that Tri-State does not receive any waste across its dock besides domestic trash. Mr. Joiner also stated that Tri-State is a non-generator of hazardous waste, and that the facility does not perform any equipment maintenance that generates used oil. After the opening conference, the inspection team conducted a visual inspection of the facility’s dock space and yard. No areas of concern (AOCs) were identified during the visual inspection; however, further EPA review may change or add to their potential AOCs. A closing conference was conducted at approximately 3:20 PM with Tri-State personnel. The inspection team requested a copy of the Tri-State’s MARPOL COA, an example of the shipping documentation for the domestic trash offloaded at its dock, and a copy of the notification sent to EPA for its transporter ID. At the time of writing this report, the inspection team had not received the requested documentation from Tri-State.			

SECTION III – RECORDS REVIEW

No RCRA regulated records were reviewed during this focused onsite inspection besides those mentioned in Section II.

SECTION IV – AREA OF CONCERN

No apparent AOCs were identified during this inspection.

SECTION V –FOLLOW UP

No documents or files were provided by the facility.