

INSPECTION REPORT

Inspection Entry Date/Time	11/06/2024 12:25 (CT)			Announced: No (tenants and related facilities)
Inspection Exit Date/Time	11/06/2024 13:40 (CT)			Access: Granted
Regulatory Program	RCRA			
Type of Inspection	Focused Compliance Inspection (FCI)			
Facility or Site Name	Enterprise Refined Products, LLC			
Facility/Site Identifier	TXD074189671			
Facility/Site Physical Address	6275 Hwy 347 Beaumont, TX 77705			
City, State, Zip Code	Beaumont, TX 77705			
County/Borough	Jefferson County			
Generator Status	VSQG			
NAICS	493190			
Type of Operation	Enterprise operates as a storage terminal facility for customers to store refined oil products in their tanks and move products by pipelines, barges, and ships.			
Geographic Coordinates	30.0337, -94.1022			
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			02/06/2025
	ERG	Vince.Damiano@erg.com		(703) 633-1732

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

The Port of 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 take, 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
Enterprise Products	Kim Stratton	(832) 256-5197	KAStratton@eprod.com	Yes	Yes
Enterprise Products	Angela Warren	(409) 656-6675	AWarren@ensolum.com	Yes	Yes
Enterprise Products	Rachel Cuevas	(409) 853-0749	RLCuevas@eprod.com	Yes	Yes
Enterprise Products	Brandon Rowland	(281) 229-8013	BCRowland@eprod.com	Yes	Yes
Enterprise Products	Coby Goos	(409) 344-2153	CGroos@eprod.com	Yes	Yes

Facility General Description

Tenant/Area	Inspection Date	Process Description	Area of Concern
Enterprise Products	11/06/24	Enterprise Refined Products, LLC (Enterprise) operates as a storage facility for customers to store refined oil products in their tanks and move products by pipelines, barges, and ships. The facility maintains a MARPOL COA for Annexes I and V but does not receive waste from vessels.	No

SECTION II – OBSERVATIONS

Tenant: Enterprise Products			
Section: 2.1	Date: 11/06/24, 12:25 PM	Contains AOC: No	Contains CBI: No
Lead Inspector: Vince Damiano	Attendees: Casey Cowley (EPROD OPS SUP)		
Enterprise, also known as Enterprise Beaumont Marine West, operates as a terminal for loading and unloading refined products via pipelines, ships, and barges. Enterprise is not associated with a port and owns its dock spaces and its operation area. The products Enterprise handles consist of gasoline, naphtha, jet fuel, diesel, and methyl tertiary butyl ether (MTBE). Enterprise receives these products from customers and stores them in one of its 37 tanks; 30 tanks were in use at the time of the inspection. Enterprise’s storage tanks range in storage capacity from 20,000 barrels to 150,000 barrels. Enterprise will also handle crude oil but only transfer crude through pipelines and not store it in their tanks. Enterprise has a MARPOL Annexes I and V COA (see Appendix 1). Enterprise personnel stated they do not accept waste from ships at their docks. Enterprise is registered as a very small quantity generator (VSQG) with the EPA (TXD074189671). Enterprise does not typically generate RCRA-regulated waste but when the facility does generate hazardous waste, it is from tank cleanouts. Most tank cleanouts generate oily waste given the nature of the products stored on site. Upon finishing the opening conference, the inspection team observed Enterprise’s dock areas and drum storage area. The inspection team observed Dock 1 and Dock 2 and did not observe any areas of concern (AOCs). Each dock has a rain collection sump that is visually inspected to verify there is no sheen on the water collected before releasing it. Next, the inspection team observed the drum storage area which was not storing any waste at the time of the inspection. The inspection team did not observe any AOCs at the time of the inspection. However, further EPA review may add to their potential AOCs. A closing conference was conducted at approximately 1:36 PM with Enterprise. Following the inspection, Enterprise provided the inspection team with an electronic copy of their MARPOL COA (see Appendix 1) and a certificate of proper recycling from EcoWerks for shipment of naphtha and alkylate tank wash water that was recycled (see Appendix 2).			

SECTION III – RECORDS REVIEW

No RCRA-regulated records were reviewed during this focused onsite inspection.

SECTION IV – 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. 11/22/24 Enterprise email – Rachel Cuevas provided the inspection team with a copy of their MARPOL COA and certificate of proper recycle from EcoWerks.

SECTION V – LIST OF APPENDICES

Appendix 1. Enterprise COA

Appendix 2. Certificate of Proper Recycling from EcoWerks

APPENDIX 1.
ENTERPRISE COA

United States Coast Guard

Certificate Of Adequacy for *Reception Facility*



This certifies that: Enterprise Beaumont Marine West has facilities adequate MARPOL I
to receive _____
_____ 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 **22APR2020** and an inspection dated **29APR2020**, 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:

22APR2025

5 years from date of issuance

J.J. Andrew
Signature of COTP

Date

J.J. ANDREW, CDR, USCG, By direction

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)

Certificate of Adequacy Inspection Endorsement
(to be endorsed after each reception facility inspection)

[illegible]

FORM A
APPLICATION FOR A RECEPTION FACILITY
CERTIFICATE OF ADEQUACY
FOR OIL

1. PARTICULARS OF TERMINAL OR PORT

A. APPLYING AS: (Check one) ☒ Terminal ☐ Port ☐ COTP Designated Port

B. NUMBER OF TERMINALS TO WHICH THIS APPLICATION APPLIES: 1

C. TERMINAL/PORT INFORMATION:

(1) NAME OF TERMINAL/PORT	<u>Enterprise Beaumont Marine West</u>
(2) ADDRESS OF TERMINAL/PORT	<u>6275 HWY 347</u>
	<u>Beaumont, Tx 77706</u>
(3) NAME OF TERMINAL/PORT	
PERSON-IN-CHARGE	<u>Operations Superintendent</u>
(4) TITLE/POSITION	<u>Keith Poland</u>
(5) ORGANIZATION	<u>Enterprise Refined Products</u>
(6) OFFICE PHONE NUMBER	<u>(409) 719-5108</u>

D. **INDIVIDUAL TERMINAL INFORMATION** . If applying as a port, list the information indicated for each terminal in the port. If more space is needed, continue on a separate sheet of paper and attach to the back of the application. The signature of the person in charge of the terminal acknowledges that the terminal agrees and volunteers to being considered as a member of the port, described in section 1, for purposes of these reception facilities. Complete the terminal name, location, etc. below.

(1) NAME OF TERMINAL	<u>Not applicable</u>
(a). ADDRESS OF TERMINAL	<u></u>
	<u></u>
(b). NAME/TITLE PERSON-IN-CHARGE	<u></u>
	<u></u>
(c). OFFICE PHONE NUMBER	<u>()</u>
(d). SIGNATURE OF TERMINAL PERSON-IN-CHARGE	<u></u>
	<u></u>
(2) NAME OF TERMINAL	<u>Not applicable</u>
(a). ADDRESS OF TERMINAL	<u></u>
	<u></u>
(b). NAME/TITLE PERSON-IN-CHARGE	<u></u>
	<u></u>
(c). OFFICE PHONE NUMBER	<u>()</u>
(d). SIGNATURE OF TERMINAL PERSON-IN-CHARGE	<u></u>
	<u></u>

2. PARTICULARS OF RECEPTION FACILITY. Enter information for each reception facility used by the terminal/port. If necessary, continue on a separate sheet and attach to the back of the Application.

A. (1) NAME OF RECEPTION FACILITY	<u>OMI LLC</u>
(2) ADDRESS	<u>5048 Houston Ave</u>
	<u>Port Arthur, TX 77640</u>
	<u>Curtis Chatelain - Facility Manager</u>

(3) NAME AND TITLE OF PERSON IN CHARGE James Stone - Deer Park PIC

(4) OFFICE PHONE NUMBER (800) 645-6671

(5) TYPE OF RECEPTION FACILITY: (Check those that apply)

☐ FIXED ☐ MOBILE ☒ TANK TRUCK ☐ TANK BARGE ☐ OTHER

(Describe other) _____

3. RECEPTION AND TRANSFER REQUIREMENTS :

A. ESTIMATED DAILY CAPACITY OF RECEPTION FACILITY:

519
(metric tons)

B. ESTIMATED DAILY CAPACITY REQUIREMENT OF THE TERMINAL/PORT:

500
(metric tons)

C. TYPES OF WASTE THE RECEPTION FACILITY CAN RECEIVE:

Oily Waste / Oily Sludge

D. SHIP TYPES OR PRINCIPAL TRADES OF SHIPS VISITING TERMINAL(S)

Refined Product Tankers

E. OILY BALLAST WASTE TRANSFER RATE (GPM):

70 GPM

F. ALL OTHER OILY RESIDUES AND MIXTURES TRANSFER RATE (GPM):

70 GPM

G. RECEPTION FACILITY CAN RECEIVE ALL THE OILY BALLAST FROM SHIPS VISITING THE TERMINAL OR PORT WITHIN 10 HOURS OF WASTE TRANSFER COMMENCEMENT. Enter either "YES", "NO", OR "N/A".

NO

(If entering other than "YES" explain.)

OILY WASTES WILL BE REMOVED BY TRUCK

H. RECEPTION FACILITY CAN RECEIVE ALL OTHER OILY RESIDUES AND MIXTURES FROM SHIPS VISITING THE TERMINAL OR PORT WITHIN 4 HOURS OF WASTE TRANSFER COMMENCEMENT. Enter either "YES", "NO", OR "N/A".

(If entering other than "YES" explain.)

YES

I. RECEPTION FACILITY FOR OIL WASTE WILL BE PROVIDED WITHIN 24 HOURS OF NOTIFICATION. Enter either "YES", "NO", OR "N/A".

(If entering other than "YES" explain.)

YES

J. OILY WASTE WILL BE TRANSFERRED PRIOR TO SHIP LEAVING SHIP REPAIR YARD. Enter "YES", "NO", OR "N/A".

(If entering other than "YES" explain.)

YES

CERTIFICATION

I HEREBY CERTIFY THAT THE INFORMATION PROVIDED IN THIS APPLICATION FOR A WASTE RECEPTION FACILITY CERTIFICATE OF ADEQUACY IS COMPLETE, TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE, INFORMATION, AND BELIEF.

SIGNATURE OF TERMINAL/PORT PERSON IN CHARGE

PRINTED OR TYPED NAME OF PERSON IN CHARGE

DATE SIGNED

Keith Poland

4/22/20

RECEPTION FACILITY INFORMATION SHEET

THIS PAGE FOR COMPLETION BY U.S. COAST GUARD

COAST GUARD COTP COMPLETE THE FOLLOWING INFORMATION AND FORWARD TO DISTRICT (m) FOR QUARTERLY SUBMISSION TO COMMANDANT (G-WPE-3):

COTP ISSUING CERTIFICATE OF ADEQUACY

MSU Post Arthur

NAME OF TERMINAL/PORT

Enterprise Beaumont Marine
West

LOCATION OF TERMINAL/PORT (City/State)

Beaumont, TX

NAME AND PHONE NUMBER OF PERSON IN CHARGE

Keith Poland

TYPE OF WASTE THE RECEPTION FACILITY CAN RECEIVE

(409) 719-5108

oily waste/sludge

DAILY CAPACITY OF RECEPTION FACILITY (metric tons)

519

OILY BALLAST WASTE TRANSFER RATE (GPM)

70

ALL OTHER OILY RESIDUES AND MIXTURES
TRANSFER RATE (GPM)

70

U.S. DEPARTMENT OF
HOMELAND SECURITY
U.S. COAST GUARD
CG-5401C (6-04)

Application for a Reception Facility Certificate of Adequacy for Garbage

FORM C

The Act to Prevent Pollution from Ships (33 USC 1901) authorizes the Department of Homeland Security to issue certificates to terminal and port facilities verifying their adequacy to receive operational garbage from ships. Regulations implementing this program are 33 CFR 160.001 of Federal Regulations Part 158. To continue to receive ships at a port or terminal an applicant must hold a Certificate of Adequacy for Garbage. This certificate is required for oceangoing tankers, or any other oceangoing ship of 400 gross tons or more, carrying residues and mixtures containing oil; or if it receives oceangoing ships carrying noxious liquids substances. To receive a Certificate of Adequacy for Garbage, an application is required for the following:

Definitions:

"Terminal": an onshore facility or an offshore structure located in the navigable waters of the United States or subject to the jurisdiction of the United States and used, or intended to be used, as a facility for the transfer or other handling of a harmful substance. The definition of "navigable waters" for the purposes of this section may be found in 33 CFR 2.05-25.

"Port": (1) a group of terminals that combines to act as a unit and be considered a port for purposes of this part; (2) a port authority or other organization that chooses to be considered a port for purposes of this part. For the purposes of Annex V of MARPOL 73/78, Port also means a commercial fishing facility, recreational boating facility and a mineral and oil industry shorebase.

A. Terminal Section:

1. Complete this section if you are applying as a SINGLE TERMINAL.

Enterprise Beaumont Marine West Terminal

Name of Terminal

6275 HWY 347

Street Address

Beaumont Tx 77705

City State Zip Code

Keith Poland

Name of Terminal Person-in-Charge

(409)-719-5108

Phone Number (Enter Area Code)

After completing this section go to Section C.

2. Check the following boxes if the terminal receives or discharges any of the following cargoes from vessels visiting the terminal:

☐ Oil	☐ Discharge	☐ Receive
☒ Oily wastes	☒ Discharge	☐ Receive
☒ Fuel	☒ Discharge	☒ Receive
☐ Bulk dry cargo	☐ Discharge	☐ Receive
☐ Explosives	☐ Discharge	☐ Receive
☐ Hazardous Substances	☐ Discharge	☐ Receive
☐ Fish	☐ Discharge	☐ Receive
☐ Other	☐ Discharge	☐ Receive

3. Check the following boxes if the terminal handles or services any of the following vessels:

☒ Vessels of Foreign registry	☐ Unmanned Barges
☒ U.S. Vessels on domestic trade	☐ Chemical ships
☒ U.S. Vessels in foreign trade	☐ Container ships
☐ Passenger vessels	☐ Break bulk ships
☒ Vessels servicing the offshore Mineral and Oil industry	☐ Ferry boat ships
	☐ Fishing ships

B. Port Section:

1. Complete this section if you are applying as a PORT.

Name of Terminal

Street Address

City State Zip Code

Name of Terminal Person-in-Charge

Phone Number (Enter Area Code)

Number of Terminals which
will be members of this
Port?: _____

The Coast Guard estimates that the average burden hours for this report form is 45 minutes. You may submit any comments concerning the accuracy of this burden estimate or any suggestions for reducing the burden to: Commandant (G-MEP-1), U.S. Coast Guard, Washington, DC 20593-0001 or Office of Management and Budget, Office of Information and Regulatory Affairs, Paperwork Project Manager for DHS/USCG, Old Executive Office Building, Washington, DC 20503.

B. Port Section (continued) Individual terminal data:

Ports are to complete the following entries for each individual terminal which is a member of the port.

2. Name of Terminal Street Address City State Zip Code Name of Terminal Person-in-Charge Phone Number (Enter Area Code) Signature of Person-in-Charge of Terminal (Signature indicates Terminal Acknowledges that terminal agrees and consents to being considered as a member of the port, described in Section B.)	5. Check the following boxes if the terminal receives or discharges any of the following cargoes from vessels visiting the terminal: <table border="0"> <tr> <td>☐ Oil</td> <td>☐ Discharge</td> <td>☐ Receive</td> </tr> <tr> <td>☐ Oily wastes</td> <td>☐ Discharge</td> <td>☐ Receive</td> </tr> <tr> <td>☐ Fuel</td> <td>☐ Discharge</td> <td>☐ Receive</td> </tr> <tr> <td>☐ Bulk dry cargo</td> <td>☐ Discharge</td> <td>☐ Receive</td> </tr> <tr> <td>☐ Explosives</td> <td>☐ Discharge</td> <td>☐ Receive</td> </tr> <tr> <td>☐ Hazardous Substances</td> <td>☐ Discharge</td> <td>☐ Receive</td> </tr> <tr> <td>☐ Fish</td> <td>☐ Discharge</td> <td>☐ Receive</td> </tr> <tr> <td>☐ Other</td> <td>☐ Discharge</td> <td>☐ Receive</td> </tr> </table>	☐ Oil	☐ Discharge	☐ Receive	☐ Oily wastes	☐ Discharge	☐ Receive	☐ Fuel	☐ Discharge	☐ Receive	☐ Bulk dry cargo	☐ Discharge	☐ Receive	☐ Explosives	☐ Discharge	☐ Receive	☐ Hazardous Substances	☐ Discharge	☐ Receive	☐ Fish	☐ Discharge	☐ Receive	☐ Other	☐ Discharge	☐ Receive
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☐ Other	☐ Discharge	☐ Receive																							
7. Name of Terminal Street Address City State Zip Code Name of Terminal Person-in-Charge Phone Number (Enter Area Code) Signature of Person-in-Charge of Terminal (Signature indicates Terminal Acknowledges that terminal agrees and consents to being considered as a member of the port, described in Section B.)	10. Check the following boxes if the terminal handles or services any of the following vessels: <table border="0"> <tr> <td>☐ Vessels of Foreign registry</td> <td>☐ Unmanned Barges</td> </tr> <tr> <td>☐ U.S. Vessels on domestic trade</td> <td>☐ Chemical ships</td> </tr> <tr> <td>☐ U.S. Vessels in foreign trade</td> <td>☐ Container ships</td> </tr> <tr> <td>☐ Passenger vessels</td> <td>☐ Break bulk ships</td> </tr> <tr> <td>☐ Vessels servicing the offshore Mineral and Oil Industry</td> <td>☐ Ferry boat ships</td> </tr> <tr> <td></td> <td>☐ Fishing ships</td> </tr> </table>	☐ Vessels of Foreign registry	☐ Unmanned Barges	☐ U.S. Vessels on domestic trade	☐ Chemical ships	☐ U.S. Vessels in foreign trade	☐ Container ships	☐ Passenger vessels	☐ Break bulk ships	☐ Vessels servicing the offshore Mineral and Oil Industry	☐ Ferry boat ships		☐ Fishing ships												
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	☐ Fishing ships																								

Section C

1. Does the terminal or port receive more than 25 visits from vessels arriving from foreign ports (except Canada), Hawaii or any territories or possessions of the United States?

☒ YES ☐ NO (If the answer is "NO" go to question No. 3)

2. Does the terminal or port have facilities approved by the Administrator, Animal and Plant Health Inspection Service, U.S. Department of Agriculture, for the disposal of garbage from foreign ports (except Canada), Hawaii or any Territories or Possessions of the United States in accordance with Title 9 Code of Federal Regulations Part 94.

☒ YES ☐ NO (If the answer is "NO" you may attach a waiver request in accordance with 33 CFR 158 on a separate attached sheet.)

Environmental Response Services

Autoclave

Name of APHIS Approved Facility

Type (Incinerator, Sterilizer, Autoclave, etc.)

Lake Charles

LA

1-337-562-0001

City

State

Phone Number

3. For those terminal(s)/port(s) requiring the services of an Animal and Plant Health Inspection Service approved facility, would the terminal or port receive all garbage from these ships visiting the terminal/port within 24 hours of vessel after notification of need for such services is given?

☒ YES ☐ NO (If the answer is "NO" you may attach a waiver request in accordance with 33 CFR 158 on a separate attached sheet.)

4. Is the terminal or port able to receive all garbage as defined in 33 CFR 158.120 which the master or person-in-charge of a ship desires to discharge, except:

- (1) large quantities of spoiled or damaged cargoes not normally expected to be discharged by a ship; or
- (2) garbage from ships not having commercial transactions with that terminal or port?

☒ YES ☐ NO (If the answer is "NO" you may attach a waiver request in accordance with 33 CFR 158 on a separate attached sheet.)

The terminal/port person-in-charge identified in the Application shall notify the U.S. Coast Guard Captain of the Port (COTP) in writing 30 days after any of the terminal/port information supplied under 33 CFR 158.165(b)(3) changes.

Civil Penalties. A person who after notice and an opportunity for a hearing, is found:

a. to have made a false, fictitious or fraudulent statement or representation in any matter in which a statement or representation is required to be made under the Act to Prevent Pollution from Ships, or the regulations thereunder, shall be liable to the United States for a civil penalty, not to exceed \$5,000 for each statement or representation; or

b. to have violated the Act to Prevent Pollution from Ships, or the regulations issued thereunder, shall be liable to the United States for a civil penalty, not to exceed \$25,000 for each violation.

CERTIFICATION

I hereby certify that the information provided in this Application for a Waste Reception Facility Certificate of Adequacy for Reception Facilities Receiving Garbage is complete, true and correct to the best of my knowledge, information, and belief.

Signature of Terminal/Port Person-in-Charge



Printed or Typed Name of Person-in-Charge

Keith Poland

Date Signed

4/22/20

Mail the application to: THE LOCAL CAPTAIN OF THE PORT OFFICE

APPENDIX 2. CERTIFICATE OF PROPER RECYCLING FROM ECOWERKS

RE: Follow-Up From EPA Visit on 11/6

From Cuevas, Rachel <RLCuevas@eprod.com>

Date Fri 11/22/2024 11:56 AM

To Vince Damiano <Vince.Damiano@erg.com>; Stratton, Kimberly <KASTRATTON@eprod.com>; Williams, David <DFWilliams@eprod.com>; Rowland, Brandon <bcrowland@eprod.com>

Cc Jon Herbay <Jon.Herbay@erg.com>; Hays, Angela <hays.angela@epa.gov>; Thapa, Sandesh <Thapa.Sandesh@epa.gov>

 2 attachments (2 MB)

Enterprise Products_Recycle Cert_BOL.pdf; BMW CoA.pdf;

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

Hi Vince,

See attached for the following:

1. MARPOL Certificate of Adequacy.
2. EcoWerks Certificate of Recycling and Bill of Lading for tank wash water.

Enterprise has not generated any tank bottoms that would be considered hazardous waste. The tanks are drain dry and produce a small amount of rinsate during tank cleanings, we have attached a certificate of recycle for the most recent tank cleaning.

Please reply with receipt of this email.

Thanks,

Rachel Cuevas
Field Environmental Engineer – Beaumont Region

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

Sent: Wednesday, November 6, 2024 5:59 PM

To: Stratton, Kimberly <KASTRATTON@eprod.com>; awarren@ensolum.com; Cuevas, Rachel <RLCuevas@eprod.com>; Rowland, Brandon <bcrowland@eprod.com>; Goos, Coby <CGoos@eprod.com>

Cc: Jon Herbay <Jon.Herbay@erg.com>; Hays, Angela <hays.angela@epa.gov>; Thapa, Sandesh <Thapa.Sandesh@epa.gov>

Subject: [EXTERNAL] Follow-Up From EPA Visit on 11/6

[Use caution with links/attachments]

Hello all,

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

- No AOCs noted.

- Please provide a copy of your MARPOL Certificate of Adequacy and the most recent Certificate of Recycle from tank bottoms.

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

Thanks,
Vince



Vince Damiano

Chemical Engineer, Chantilly Office

Cell: (703) 835-6281

Vince.Damiano@erg.com

This message (including any attachments) is confidential and intended for a specific individual and purpose. If you are not the intended recipient, please notify the sender immediately and delete this message.



6200 Procter St. Ext.,
Port Arthur, TX 77642
Office: 409-962-7469
Fax: 409-962-7480

www.EcoWerks.com

Waste Alternatives:

Recycling
Resource recovery
Waste minimization
Oily waste & wastewater
specialists
Bilge water and engine room
slops recycling
Analysis and profiling
On site and portable
wastewater treatment
Waste to energy
Waste brokerage

Industries:

Marine
Petrochemical
Heavy & Light Industry
Oil & Gas
Government & Military

Services:

Equipment Decontamination
Tank Cleaning, traditional &
Robotic/non entry
Transportation & logistics
Chemical & resource recovery
Project planning & execution
Emergency & disaster
response & support

Warrant of compliance with applicable regulations in handling of materials and certificate of proper recycling of tank wash water from Enterprise Products Beaumont TX.

Dear Kim Stratton

On 21 March 2023, EcoWerks received 3,500 gallons of naphtha and alkylate tank wash water from Enterprise Products.

Material was pumped into vacuum trucks operated by Lighthouse Environmental at Enterprise Products Beaumont TX.

In accordance with our process, Oils (hydrocarbons) are recycled (recovered), cleaned up and sold into oil markets clearly meeting recycling requirements and definitions, and thus falling under RCRA exemptions, you are not disposing of a waste but rather providing a product for recycling. This dramatically reduces or eliminates long-term potential liabilities for our clients.

Please do not hesitate to call if you have any questions.

Kind Regards,

Joseph Hollis
Plant Manager
EcoWerks/AMLON Group



Lighthouse

ENVIRONMENTAL SERVICES

HT 15313

06454

WORK ORDER / BILL OF LADING

BOL No.

HAUL TICKET NO. 15313

JOB NO. 1004-0948

BOX NO. V 25-1256

TRUCK NO. 12607

SITE ADDRESS: Enterprise Products - Beaumont Marine West Terminal 6275 Highway 347 Beaumont, TX 77705		TO CONSIGNEE: Lighthouse Environmental Services, Inc. c/o Ecowerks 6280 Proctor St Port Arthur, TX 77642	
CONTACT: Kim Stratton PHONE: 832-282-9947 EXT: FAX:		CONTACT: Joe Hollis, GM PHONE: 409-543-1910	

CARRIER INFORMATION

Transporter: Lighthouse Environmental Services, Inc. 4904 Fuqua Houston, TX 77046 U = 713-987-0400	STATE REGISTRATION TX NO.	40543
	U.S. EPA I.D. NO.	TXD037227121
	U.S. D.O.T. REGISTRATION NO.	1664862
	TRCC WASTE HAULER NO.	4219

DRIVER INFORMATION

Wash-out ☐ Yes ☐ No		COMMENTS: Pick up 1 vacuum box Naptha & Alkylate & Deliver to Ecowerks - Port Arthur
Heel ☐ Yes ☐ No _____ Gallons		

U.S D.O.T. DESCRIPTION	CONTAINERS		Total Quantity	UNIT
	DRUM	TANK	Gallons	WT/VOL
☐ Non-Hazardous Industrial Wastewater ☐ Used Filters/Absorbents - Non DOT Regulated ☐ Oily Water, Non-Hazardous ☐ Recycled Fuel Oil - Non DOT Regulated ☐ Fuel Oil - Combustible Liquid 3, NA 1993, PGIII ☐ RQ - Other regulated substances, Liquid N.O.S., 9, NA 3082, PGIII (Ethylene Glycol) ☐ Combustible Liquid, N.O.S., (Petroleum Oil), NA 1993 PGIII ☐ Flammable Liquid, N.O.S., (Petroleum Product), 3, UN 1993, PGIII ☐ Other - Description: <u>Naptha & Alkylate wash water</u>			3500 Gallons	
			EMERGENCY CONTACT: Chem-Trec 800-424-9300	

SHIPPER'S CERTIFICATION: I hereby declare the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, labeled, and are in all respects in proper condition for transport by highways according to applicable International and National governmental regulations. I certify that the material removed from the above premises is not hazardous waste as identified in 40 CFR Part 261, and does not contain PCB's as identified in 40 CFR Part 761.

Print/Type Name: <u>X Focher Repair</u>	Signature: <u>X [Signature]</u>	Date: <u>X 3-21-23</u>
TRANSPORTER ACKNOWLEDGEMENT OF RECEIPT OF MATERIALS		
Print/Type Name: <u>Carey Johnson</u>	Signature: <u>[Signature]</u>	Date: <u>3-21-23</u>
Print/Type Name:	Signature:	Date:
DESIGNATED FACILITY ACKNOWLEDGEMENT OF RECEIPT OF MATERIALS		
Print/Type Name: <u>Madison Tramm</u>	Signature: <u>[Signature]</u>	Date: <u>3/21/23</u>