

INSPECTION REPORT

Inspection Entry Date/Time	4/24/2025 1:30 PM (CT)	Announced: No (tenants and related facilities)
Inspection Exit Date/Time	4/24/2025 2:30 PM (CT)	Access: Granted
Regulatory Program	RCRA	
Type of Inspection	Compliance Evaluation Inspection (CEI)	
Facility or Site Name	BWC New Orleans LLC	
Facility/Site Identifier	LAD034426288	
Facility/Site Physical Address	660 La Bauve Dr.	
City, State, Zip Code	Westwego, LA 70094	
County/Borough	Jefferson	
Generator Status	Large Quantity Generator (LQG)	
NAICS	493190	
Type of Operation	BWC New Orleans LLC (BWC NOLA) is a bulk liquid storage terminal where barges, vessels, trucks, and railcars transport products in and out of the facility.	
Geographic Coordinates	29.9135, -90.1400	

Additional Persons Participating in Inspection:			
Name	Title	Organization	Email
Sandesh Thapa	Inspector	EPA REGION 6	Thapa.Sandesh@epa.gov
Joseph Watson	Contractor	Eastern Research Group (ERG)	Joe.Watson@erg.com
Lead Inspector:			
Vince Damiano		Vincent Damiano	Digitally signed by Vincent Damiano Date: 2025.06.06 15:29:36 -04'00'
	ERG	Vince.Damiano@erg.com	

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

The Port of New Orleans 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, 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	Sandesh Thapa	Thapa.Sandesh@epa.gov	Yes	Yes
RCRA Inspector/ Contractor/ERG	Joseph Watson	Joe.Watson@erg.com	Yes	Yes
HSEQ Manager/BWC	Walter Pertuit	Wpertuit@bwcterminals.com	Yes	Yes
Operations Manager/BWC	Salvador Boudreaux	Sboudreax@bwcterminals.com	Yes	Yes
Terminal Manager/BWC	Josh Carter	Jcarter@bwcterminals.com	Yes	Yes

Facility General Description

Tenant/Area	Inspection Date	Process Description	Area of Concern
BWC New Orleans LLC	4/24/25	BWC NOLA is a bulk liquid storage terminal where barges, vessels, trucks, and railcars transport products in and out of the facility. The facility maintains a MARPOL Annex I and V COA.	Yes

SECTION II – OBSERVATIONS

Facility: BWC New Orleans LLC			
Section: 2.1	Date: 4/24/25, 01:30 PM	Contains AOC: Yes	Contains CBI: No
Lead Inspector: Vince Damiano	Attendees: Walter Pertuit (HSEQ Manager), Josh Carter (Terminal Manager), and Salvador Boudreaux (Operations Manager)		
BWC NOLA is located in Westwego, LA, and operates as a bulk liquid storage terminal on the Mississippi River. The facility stores and handles products such as base oil, caustic soda, vegetable oils, and diethanolamine. BWC NOLA has 42 storage tanks ranging in capacity from 5,000 barrels to 100,000 barrels. BWC NOLA can load and unload products via trucks, railcars, and marine barges at its single dock berth. The facility also has a product drumming operation. The facility maintains a MARPOL Annex I and V COA. Tank cleaning and maintenance activities, such as painting, are conducted by third-party contractors who are responsible for managing any waste generated from those operations. According to Mr. Carter, no waste is allowed to be transferred across the dock space. BWC is registered with the EPA as a LQG of hazardous waste under EPA ID LAD034426288. After the opening conference, the inspection team observed BWC NOLA’s hazardous waste central accumulation area and the dock space. In the hazardous waste central accumulation area, the inspection team observed two full 55-gallon drums labeled as glycerin flush, dated June 19, 2020 (see Appendix 1 – Photos 1 to 3). The facility representatives stated these drums were from a line flush and have been in the waste storage area for a long time. They believed the waste was non-hazardous waste, but were uncertain [AOC #1 – BWC NOLA did not make a waste determination – 40 CFR 262.11]. The inspection noted that there was no posted signage in the area or on the building indicating this was BWC NOLA’s hazardous waste central accumulation area, and indicated it is a best management practice to indicate a hazardous waste storage area (see Appendix 1 – Photo 4) The inspection team then observed the dock space. No areas of concern (AOCs) were noted at the dock. 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 2:30 PM with BWC personnel. The AOCs were communicated during the closing. Following the inspection on 5/8/2025, Mr. Josh Carter sent a follow-up email in response to the AOCs observed during the inspection, including: • Photos of the two drums of glycerin flush labeled as non-hazardous waste and a posted hazardous waste sign in the hazardous waste storage area (see 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: BWC New Orleans LLC		
AOC #1 – BWC NOLA did not make a waste determination.	Citation: 40 CFR 262.11	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. 5/8/25 BWC NOLA email – Mr. Josh Carter provided the inspection team with photos of corrections made towards AOCs observed.

SECTION VI – LIST OF APPENDICES

Appendix 1. Photograph Log

Appendix 2. 5/8/2025 BWC NOLA Response

APPENDIX 1.
PHOTOGRAPH LOG



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Location: BWC New Orleans LLC		
City: Westwego	County/Parish: Jefferson	State: Louisiana



Photo No. 1

Photo File Name: DSCN7982

Date of Photo: 4/24/2025

Time of Photo: 1404 hrs.

Photographer: Vince Damiano

Description: View of two full 55-gallon drums of glycerin flush found in the hazardous waste central accumulation area.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Location: BWC New Orleans LLC		
City: Westwego	County/Parish: Jefferson	State: Louisiana



Photo No. 2

Photo File Name: DSCN7983

Date of Photo: 4/24/2025

Time of Photo: 1404 hrs.

Photographer: Vince Damiano

Description: View of label on one of the full 55-gallon drums of glycerin flush found in the hazardous waste central accumulation area building, dated 6/19/2020.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Location: BWC New Orleans LLC		
City: Westwego	County/Parish: Jefferson	State: Louisiana



Photo No. 3

Photo File Name: DSCN7984

Date of Photo: 4/24/2025

Time of Photo: 1404 hrs.

Photographer: Vince Damiano

Description: View of label on one of the full 55-gallon drums of glycerin flush found in the hazardous waste central accumulation area, dated 6/19/2020.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Location: BWC New Orleans LLC		
City: Westwego	County/Parish: Jefferson	State: Louisiana



Photo No. 4

Photo File Name: DSCN7985

Date of Photo: 4/24/2025

Time of Photo: 1408 hrs.

Photographer: Vince Damiano

Description: Overview of the hazardous waste central accumulation area with no signage.

APPENDIX 2.
5/8/2025 BWC NOLA RESPONSE

RE: Follow-up from EPA Visit on 4/24/2025 (New Orleans)

From Carter, Josh (Westwego) <jcarter@bwcterminals.com>

Date Thu 5/8/2025 11:34 AM

To Vince Damiano <Vince.Damiano@erg.com>; wpartuit@bwcterminals.com <wpartuit@bwcterminals.com>; Boudreaux Jr, Salvador (Westwego) <sboudreaux@bwcterminals.com>

Cc Joe Watson <Joe.Watson@erg.com>; Thapa, Sandesh <Thapa.Sandesh@epa.gov>

 2 attachments (8 MB)

IMG_5964.jpeg; IMG_5963.jpeg;

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

Hey Vince,

Please see attached for the signage for the waste storage area and the two 55-gallon drums.

Our LDEQ AI# is LA0073679.

Thanks,

Josh Carter

Terminal Manager

BWC Terminals LLC

660 La Bauve Dr

Westwego, LA 70094

O: (504) 340-3000 (Ext 9213) | M: (504) 912-1183

jcarter@bwcterminals.com | www.BWCTerminals.com



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

Sent: Thursday, April 24, 2025 6:18 PM

To: wpartuit@bwcterminals.com; Boudreaux Jr, Salvador (Westwego) <sboudreaux@bwcterminals.com>; Carter, Josh (Westwego) <jcarter@bwcterminals.com>

Cc: Joe Watson <Joe.Watson@erg.com>; Thapa, Sandesh <Thapa.Sandesh@epa.gov>

Subject: Follow-up from EPA Visit on 4/24/2025 (New Orleans)

Some people who received this message don't often get email from vince.damiano@erg.com. [Learn why this is important](#)

*** External Email ***

Hello,

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:

- Waste determinations on the two 55-gallon drums in the waste storage area
- Posted a sign of the Waste Storage Area
- LDEQ AI #

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



NOTICE
NON-HAZARDOUS
WASTE
STORAGE AREA

