

Region 6 - Enforcement & Compliance Assurance Division

INSPECTION REPORT

Inspection Date(s):	07/26-29/2022	
Media Program:	RCRA Compliance Evaluation Inspection	
Regulatory Program(s)	RCRA Large Quantity Generator	
Company Name:	Calumet Shreveport Refining, LLC	
Facility Name:	Calumet Lubricants	
Facility Physical Location:	3333 Midway Avenue	
(city, state, zip code)	Shreveport, LA 71109	
Mailing address:	3333 Midway Avenue	
(city, state, zip code)	Shreveport, LA 71109	
County/Parish:	Caddo County	
Facility Phone Number	(318) 636-2711	
Facility Contact:	Kristin Bahus	Environmental Manager
	kristin.bahus@clmt.com	
FRS Number:	N/A	
Identification/Permit Number:	N/A	
Media Identifier Number:	LAD008052334	
NAICS:	324110 - PETROLEUM REFINERIES	
SIC:	N/A	
Personnel participating in inspection:		
John Penland	EPA Region 6 (ECDSR)	Lead Inspector
AD Talton	EPA Region 6 (ECDSR)	Inspector
Elizabeth Pham	EPA Region 6 (ECDSR)	Inspector
Warren Williams	Louisiana Department for Environmental Quality	Waste Investigator
Brandon Brasuell	Louisiana Department for Environmental Quality	Waste Investigator
Kristin Bahus	Calumet Specialty Products, LP	Environmental Manager
Mark Cheesman	Calumet Specialty Products, LP	Sr. HSE Assessor
Chet Yeo	Calumet Specialty Products, LP	HSE Manager
James Desonier	Calumet Specialty Products, LP	Operations Manager
Eddie Lewis	Norton Rose Fulbright US LLP	Counsel for Calumet
Brittany Covert	Norton Rose Fulbright US LLP	Counsel for Calumet
EPA Lead Inspector Signature/Date	ELIZABETH PHAM Digitally signed by ELIZABETH PHAM Date: 2022.11.18 10:11:18 -06'00'	
	John Penland – Lead Inspector	Date
Supervisor Signature/Date	JEFFREY YURK Digitally signed by JEFFREY YURK Date: 2022.11.18 11:26:01 -06'00'	
	Jeff Yurk – Waste Section Chief	Date

Section I – INTRODUCTION

PURPOSE OF THE INSPECTION

During the week of July 25, 2022, I, John Penland, conducted an unannounced inspection of the Calumet Lubricants facility (Calumet) located at 3333 Midway Avenue in Shreveport, Louisiana for compliance with the Resource Conservation and Recovery Act (RCRA). I was assisted on this inspection by Environmental Protection Agency (EPA) inspectors AD Talton and Elizabeth Pham. The inspection included a walkthrough of the facility's production, waste generation, and management units and a review of the facility records related to hazardous waste management.

The Calumet facility was targeted for inspection as part of facilities located in Environmental Justice communities and Regional and National investigation initiatives to evaluate facilities subject to RCRA Subpart AA, BB, CC, regulations related to air emissions from hazardous waste management units.

We concluded the inspection of the Calumet facility on July 29, 2022, with a closing conference where we presented our provisional areas of concern.

This report serves as documentation of all onsite activities and observations during the inspection of the Calumet facility. Photographs taken during the inspection to document onsite observations are included as Appendix 1. A summary of all areas of concern identified during the inspection is provided in Section III.

FACILITY DESCRIPTION

The Calumet facility is located on Midway Avenue in Shreveport, Louisiana. Calumet operates 24 hours per day, 7 days per week, 52 weeks a year as an oil refinery which processes crude oil by use of distillation, reforming, hydro-finishing, propane de-asphalting, desulphurization, hydrogenation, solvent extraction, hydrotreating, MEK dewaxing and treating process equipment to produce propane, butane, diesel, fuel oils, lubricating oil, wax, lube stocks, transformer oil, and asphalt. An Amine scrubbing unit removes hydrogen sulfide (H₂S) from the fuel gas system and a Claus Sulfur Recovery Plant converts the recovered H₂S into molten sulfur for sale.

Feed stocks and finished products are stored in pressure tanks, floating roof tanks, cone roof tanks, and gas blanketed tanks. The feedstock is received by trailer truck and rail car. The finished products are shipped by truck and rail cars.

The Calumet facility is engaged in the production of paraffinic lubes, fully refined petroleum waxes, naphthenic lube oils, and associated fuel products. Calumet has a maximum unit throughput capacity of approximately 65,000 barrels per day.

A general map of the plant is included in Appendix 2.

The Calumet facility was issued the EPA ID# LAD008052334. Calumet is operating as a Large Quantity Generator (LQG) of hazardous waste since October 2017.

Section II - OBSERVATIONS

The team and I conducted the onsite inspection during normal business hours from July 26-29, 2022. During the inspection, the facility was conducting normal operations and all areas of the facility were in use. Throughout the week we visited each of the facility's waste generation, accumulation, and management areas. We also reviewed the facility's operating records pertaining to the facility's RCRA applicability and compliance requirements.

This section provides an abbreviated description of our daily activities. Appendix 1 provides photographs of our observations. This section provides information on our observations each day. Unless otherwise specified, the statements cited in this section reflect those claims made by facility personnel or documents reviewed during the inspection.

July 26, 2022

AD Talton, Elizabeth Pham, and I entered the facility at approximately 0905 hrs where we presented our credentials to Ms. Kristin Bahus and informed her that we were there to conduct an inspection of the facility under Section 3007 of the Resource Conservation and Recovery Act (RCRA). We were accompanied by members of Louisiana Department for Environmental Quality, Warren Williams and Brandon Brasuell. The opening conference sheet is shown in Appendix 5. I discussed the purpose of EPA's inspection and explained the right of Calumet to assert a Confidential Business Information claim for records requested by EPA. This discussion was followed by a presentation of EPA Region 6's Confidentiality Notice (40 CFR Section 2.203). Following this introduction, we conducted an inspection opening briefing with Kristin Bahus and Cedric McCall of Calumet Specialty Products. This included a discussion of the inspection process over the course of the week, and I presented the initial request for compliance records. The meeting concluded with a safety briefing at approximately 1045 hrs. Following the opening briefing, we conducted a walkthrough of Calumet's production and associated waste management areas at 1100 hrs. The walkthrough began on the South entrance of the office.

The Central Waste Accumulation Area is located outdoors south of the office building. Appendix 3 includes an inventory of the containers stored in this area. All containers initially appear to be in good condition and closed but are stored outdoors in direct sunlight. We identified 1 portable tank nearby, labeled as 'Spent Carbon, For Env Use Only Rec 6/20' and Ms. Bahus said Calumet will research the source and use of this tank and whether it currently contains spent carbon.

The Oil Sample Box located outdoors southeast of the Central Waste Accumulation Area is unlabeled and open. According to Ms. Bahus, this box receives process samples for return to the Crude process. The sewer sumps in the Crude process area observed during the walkthrough are cleaned annually.

The Bundle Cleaning Pad located outdoors southeast of the Central Waste Accumulation Area is extensively stained and solid material was present at the time of this inspection. The pad is surrounded by a 3 to 4-foot concrete wall which may allow material to be released from the pad during the bundle cleaning. I requested an SOP at time of inspection. The exterior of the concrete wall has extensive staining. No accumulation of waste material was identified outside of the pad.

A frac tank is located within the secondary containment of tank 60. I requested the use of this frac-tank and its contents. We identified three open drums located in the tank farm immediately east of tank 112. Two of these drums were marked with weathered non-hazardous labels and the other was not labeled

or covered. We have requested the identity of the material, generating process, and end-use of the material in these containers. We identified one open roll-off container of material located near the wax hydrotreating area. The roll-off was not marked, so I requested information about the material in the roll-off such as, generating process and end-use of the material. Additional SDS documents for Criterion DN-3551 and HS-022 were requested during the walkthrough.

We departed the Calumet facility at approximately 1300 hrs.

July 27, 2022

AD Talton, Elizabeth Pham, and I entered the facility at approximately 0830 hrs. We were accompanied by members of Louisiana Department for Environmental Quality, Warren Williams and Brandon Brasuell. New members from the Calumet facility joined on this day's walkthrough including Mark Cheeseman, Chet Yeo, James Desonier and counsel for Calumet, Eddie Lewis and Brittany Covert. Following introductions, the walkthrough for the second day of inspection started at approximately 0900 hrs.

We identify one 55-gallon drum of sludge from the knockout pots located near the MEK Unit. This container is marked as hazardous waste with an accumulation start date of 6/29/2022. Based on its location outside of the designated central accumulation area, I asked Ms. Bahun to verify that this drum has been included in the facility's weekly <90-day container inspections.

On the eastern side of the MEK unit, we identify four frac tanks which are open. Two are marked with non-hazardous waste stickers and two are marked with hazardous waste stickers and with "pending analysis" signs. According to the facility representatives, these tanks were empty and not in use. Each frac tank held an accumulation of liquid but facility representatives stated this may have been precipitation. Due to the labeling and the presence of liquid inside the tanks we were not able to determine whether these frac tanks were out-of-service.

Out Of Service (OOS) - Soy Oil Hydrotreating Reactor

We observe five, 55-gallon metal drums of unused catalyst that will be used in the reactor, per the facility representatives. According to James Desonier and Chet Yeo, this unit has been out of service for an extended period of time (I later requested an actual date of OOS). The containers storing the catalyst are in poor condition with rusted lids with material exposed. The containers were marked D202019, but we were uncertain if this signified a production date. I raised the issue of speculative accumulation with Kristin Bahun and Calumet's counsel for this material and the facility will need to make a waste determination.

Laboratory Exterior Waste Accumulation Area

We identify three 55-gallon containers located underneath an awning outside south of the laboratory. One is marked as FDA waste satellite accumulation, one is marked as carbon disulfide waste satellite accumulation, and one is marked MEK Wax waste satellite accumulation. The FDA waste drum, and the carbon disulfide waste drum are not equipped with a lock ring (closure devices for waste containers should be secured in the closed position). The MEK Wax drum was equipped with a lidded funnel that was latched at the time of this inspection.

Next to the laboratory exterior waste drums, we found two 55-gallon closed-head drums which were unlabeled and contained an unidentified material. Next to the East Diesel Salt Drum we observed a carbon canister which was in poor condition. The carbon canister was open and appeared to have been used. No waste markings were present. In the Vacuum unit we found two drums marked with non-hazardous waste labels but were also marked as “unknown?”. I requested a waste determination for the drums’ contents. On the West side of the crude unit, was an accumulation of sixteen, 55-gallon drums of an unused amine product. According to Chet Yeo and James Desonier, these are a product that the facility received but cannot use in their process. No determination has been made for this material and there was no information to determine how long the amine product had been there. This material is being assessed under the definition of speculative accumulation and a waste determination will need to be made. In the same area as the drums noted, was a pallet with an accumulation of what appeared to be 5-gallon pails of paint. No waste markings or accumulation dates were present on these containers and the facility will need to make a waste determination for this material.

DAF management

DAF float from the petroleum refining industry is a listed waste with the waste code of K048. This waste is generated when it is removed from the DAF unit. The facility accumulates this waste in the Float Tank prior to pumping it to the Oily Sludge Thickener Tank where it is treated to remove excess water. At the time of this inspection, the pump associated with the Float Tank had released the DAF float into the secondary containment for the Float Tank due to a faulty seal.

While the DAF Float is generated after removal from the DAF Unit, the accumulation and treatment tanks used for its management appear to be exempt from the RCRA permitting requirements as codified in 40 CFR 270.1(c)(2)(v). However, releases of this material are releases of hazardous waste and do not constitute a new point of generation for this waste.

Bundle cleaning pad

One 55-gallon drum of “sulfur waste” was observed located on the bundle cleaning pad. This container is unlabeled and is in poor condition. Shortly after we arrived at the pad, a facility operator arrives with an over-pack drum to repackage the 55-gallon drum. After the drum is placed in the over-pack drum, the operator places a hazardous waste label on the container and marks an accumulation date as 7/27/2022. However, we are unable to confirm this date. Based on the condition of the container and the fact that it was unlabeled when first observed. A review of both the waste determination and the accumulation start date for this container will be conducted.

Laboratory

In the laboratory one satellite accumulation jar for chloride testing waste is observed. According to the lab technician responsible for this container, they transfer its contents to the 55-gallon MEK wax drum located on the south side of the laboratory. This drum is in service but unlabeled at the time of this inspection. One other satellite accumulation bucket is observed in a laboratory hood. The bucket is

labeled as carbon disulfide (P022, D001, F035) satellite accumulation container. Waste is transferred to the 55-gallon carbon disulfide satellite accumulation drum located outside south of the laboratory.

Concluding the walkthrough, I reviewed the Daily Summary from 7/27/2022 with the Calumet representatives. No new information was provided during the meeting.

We departed the Calumet facility at approximately 1300 hrs.

July 28, 2022

AD Talton, Elizabeth Pham, and I entered the facility at approximately 0830 hrs. We were accompanied by members of Louisiana Department for Environmental Quality, Warren Williams and Brandon Brasuell. Calumet is represented by Kristin Bahus, Mark Cheesman, Chet Yeo, James Desonier, and counsel for Calumet, Eddie Lewis and Brittany Covert. The third day of the inspection started at approximately 0905 hrs.

I reviewed the Daily Summary Items from July 26 and 27, 2022. Calumet shared the following documents:

- Calumet's Hazardous Waste Contingency Plan
- Waste Profiles for hazardous and non-hazardous waste
- Calumet's Clean Air Act Title V permit
- Facility Plot Map
- WWTU diagram
- Process Overview diagram
- Annual Waste Reports for 2019-2021
- <90-day hazardous waste inspection forms for January 4, 2019, through July 22, 2019

According to Kristin Bahus, Calumet is preparing a response which will address all outstanding issues in a single document rather than addressing them piecemeal.

I then began a discussion about documents pertaining to Large Quantity Generators of hazardous waste. The first item for discussion was training records for specific members of the Calumet facility. The requested records should demonstrate compliance with the requirements of 40 CFR 262.17(a)(7). The records requested were for the following personnel: Laura Ellis, Brian Smith, Billy McClain, James Desonier, Kristi Shoemaker, Phillip Ambrose, Jason Brancamp, Cory Farris, Eileen Cronin and Michael Hall, Jr. The second item discussed was Calumet's Contingency Plan. According to Chet Yeo and Kristin Bahus, Calumet is currently in the process of revising its Hazardous Waste Contingency Plan to reflect its implementation of the ICS. Calumet has hired Heritage Environment Services to consult on these revisions. At the time of this inspection, the Hazardous Waste Contingency Plan is out of date. The plan provided to us was last revised in March of 2013. As a result, the following sections are not accurate: Emergency Coordinator list, Spill Response Team/Contractors, and List of Emergency Response Personnel. The Plan references external documents and diagrams. We request the following attachments:

- Calumet Shreveport Refinery Procedure Number 00-h-0071.doc, "Hazardous Waste Containment & Handling," for procedures for handling hazardous wastes
- Calumet Shreveport Refinery Procedure Number 00-h-0070.doc, "Hazardous Materials Spills & Immediate Response," for procedures for handling spills of hazardous wastes
- Calumet Shreveport Refinery Procedure Number 00-h-0068.doc, "HAZWOPER" procedure for management of hazardous substance release
- The current facility evacuation map

I also request SOPs related to waste handling and transport, <90-day inspections, generation of K050, and SDS's for Criterion DN-3551, 16 drums of amine located on western side of facility, and for soy oil catalyst.

The EPA team and I, along with members of LDEQ reviewed documents from the OneDrive provided by Calumet's counsel Eddie Lewis and Brittany Covert. We departed the Calumet facility at approximately 1430 hrs.

July 29, 2022

AD Talton, Elizabeth Pham, and I entered the facility at approximately 0815 hrs. We were accompanied by a member of Louisiana Department for Environmental Quality, Warren Williams. Members from the Calumet facility joined, including Mark Cheeseman and Kristin Bahus, and counsel for Calumet, Eddie Lewis and Brittany Covert.

To start the day off, James Desonier led a table-top explanation of the refinery's production units and walkthrough of the facility's operations. The process flow diagram for the facility is shown in Appendix 4. I then requested to speak to Kristi Shoemaker and asked her questions on the management of weekly inspection reports. The EPA team and I, along with members of LDEQ reviewed documents from the OneDrive provided by Calumet's counsel Eddie Lewis and Brittany Covert.

The closing conference began at 1300 hrs. The closing conference sheet is shown in Appendix 5. I presented the remaining areas of concerns with facility representatives and together we reviewed the outstanding document requests and established a schedule for submittal.

We departed the Calumet facility at approximately 1400 hrs.

Daily e-mails were sent to facility after the end of each day of the inspection. Records of the daily e-mails are shown in Appendix 6.

Section III – AREAS OF CONCERN

During the closing conference, I reviewed the 16 areas of concern noted during the inspection.

The following is a list of potential areas of concern discussed with the facility representatives. See Section II for details of EPA observations.

Central Waste Accumulation

- Unused Criterion DN-3551 – in a 55-gallon drum labeled non-hazardous with no generation date, needs a determination review verified and validated.
- Spent Carbon Tank – determine the contents inside, is it still unused?
- Open Drum – labeled as non-hazardous without lid. The contents is not known by facility representatives.

Container Management

- Roll-Off Box – opened and unlabeled with contaminated soil, needs a waste determination.
- Sludge from knock-out pots – In a 55-gallon drum labeled 6/29/22 near MEK unit. Not relocated to central accumulation unit and not in the weekly inspection reports.
- Sixteen 55-gallon drums of unused amine product – unusable product in which Chet Yeo explains it is an amine additive and he has received labels for it.
- Waste paint on pallet that has been accumulated waiting for disposal.

Laboratory

- Satellite accumulation jar in lab must be maintained and checked weekly
- One 55-gallon MEK wax satellite accumulation drum in lab is unlabeled.
- One satellite accumulation bucket in lab is unlabeled.

Other.

- Contingency Plan was last updated in 2013
- Facility inspection records have inconsistent date that may be a typo but needs to be verified.
- Waste codes on manifest are not on Annual Waste Summary.
- Leak in DAF unit – pump seal is gone, and facility does not know how long leak has been occurring.
- Bundle Cleaning Pad – staining on the outside of pad.
- Out-of-Service soy oil catalyst – SDS was requested, and uploaded to EPA electronic drive. Concerns of speculative accumulation during walkthrough.

Section IV – FOLLOW UP

Actions taken by Calumet to resolve any areas of concern were documented by Calumet with photographs or other documentation and submitted to the EPA via the electronic secure online drive. Any information received from Calumet after the inspection will be received via the secure online drive. These documents are accessible by the EPA Enforcement Officer.

Section V – LIST OF APPENDICES

- Appendix 1 – Photograph Log – 72 Photos
- Appendix 2 – Facility Diagram
- Appendix 3 – Central Waste Accumulation Area Container Inventory
- Appendix 4 – Process Flow Diagram
- Appendix 5 – Opening and Closing Conference Sign-in Sheets
- Appendix 6 – EPA Daily Summary E-mails

Appendix 1

Photograph Log

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 1

Location: Calumet Lubricants, 3333 Midway Avenue		
City: Shreveport	County/Parish: Caddo	State: Louisiana



Photo #:	DSCN0662.jpg
Date:	7/26/2022
Camera:	Nikon COOLPIX AW120
Photographer:	Elizabeth Pham
Witness:	Elizabeth Pham, AD Talton, John Penland
Description: Overview 90-Day Pen Right Side	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 2

Location: Calumet Lubricants, 3333 Midway Avenue		
City: Shreveport	County/Parish: Caddo	State: Louisiana



Photo #:	DSCN0663.jpg
Date:	7/26/2022
Camera:	Nikon COOLPIX AW120
Photographer:	Elizabeth Pham
Witness:	Elizabeth Pham, AD Talton, John Penland
Description: Lab Sharp Overview (Four Drums)	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 3

Location: Calumet Lubricants, 3333 Midway Avenue		
City: Shreveport	County/Parish: Caddo	State: Louisiana



Photo #:	DSCN0664.jpg
Date:	7/26/2022
Camera:	Nikon COOLPIX AW120
Photographer:	Elizabeth Pham
Witness:	Elizabeth Pham, AD Talton, John Penland
Description: Lab Sharp Labels dates visible in photo: 1-17-22 and 2-8-22	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 4

Location: Calumet Lubricants, 3333 Midway Avenue		
City: Shreveport	County/Parish: Caddo	State: Louisiana



Photo #:	DSCN0665.jpg
Date:	7/26/2022
Camera:	Nikon COOLPIX AW120
Photographer:	Elizabeth Pham
Witness:	Elizabeth Pham, AD Talton, John Penland
Description: Criterion Overview (Three drums)	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 5

Location: Calumet Lubricants, 3333 Midway Avenue		
City: Shreveport	County/Parish: Caddo	State: Louisiana



Photo #:	DSCN0666.jpg
Date:	7/26/2022
Camera:	Nikon COOLPIX AW120
Photographer:	Elizabeth Pham
Witness:	Elizabeth Pham, AD Talton, John Penland
Description: Criterion Labels as seen on three drums in photograph #4	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 6

Location: Calumet Lubricants, 3333 Midway Avenue		
City: Shreveport	County/Parish: Caddo	State: Louisiana



Photo #:	DSCN0667.jpg
Date:	7/26/2022
Camera:	Nikon COOLPIX AW120
Photographer:	Elizabeth Pham
Witness:	Elizabeth Pham, AD Talton, John Penland
Description: Criterion drum label	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 7

Location: Calumet Lubricants, 3333 Midway Avenue		
City: Shreveport	County/Parish: Caddo	State: Louisiana



Photo #:	DSCN0668.jpg
Date:	7/26/2022
Camera:	Nikon COOLPIX AW120
Photographer:	Elizabeth Pham
Witness:	Elizabeth Pham, AD Talton, John Penland
Description: Blue plastic drums marked 434 Through 437.	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 9

Location: Calumet Lubricants, 3333 Midway Avenue		
City: Shreveport	County/Parish: Caddo	State: Louisiana



Photo #:	DSCN0670.jpg
Date:	7/26/2022
Camera:	Nikon COOLPIX AW120
Photographer:	Elizabeth Pham
Witness:	Elizabeth Pham, AD Talton, John Penland
Description: Overview of <90-Day storage area - Left Side	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 10

Location: Calumet Lubricants, 3333 Midway Avenue		
City: Shreveport	County/Parish: Caddo	State: Louisiana



Photo #:	DSCN0671.jpg
Date:	7/26/2022
Camera:	Nikon COOLPIX AW120
Photographer:	Elizabeth Pham
Witness:	Elizabeth Pham, AD Talton, John Penland
Description: Spent carbon container – view of back	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 11

Location: Calumet Lubricants, 3333 Midway Avenue		
City: Shreveport	County/Parish: Caddo	State: Louisiana



Photo #:	DSCN0672.jpg
Date:	7/26/2022
Camera:	Nikon COOLPIX AW120
Photographer:	Elizabeth Pham
Witness:	Elizabeth Pham, AD Talton, John Penland
Description: Spent carbon container – view of front	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 12

Location: Calumet Lubricants, 3333 Midway Avenue		
City: Shreveport	County/Parish: Caddo	State: Louisiana



Photo #:	DSCN0673.jpg
Date:	7/26/2022
Camera:	Nikon COOLPIX AW120
Photographer:	Elizabeth Pham
Witness:	Elizabeth Pham, AD Talton, John Penland
Description: Overview of spent carbon container – green container.	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 13

Location: Calumet Lubricants, 3333 Midway Avenue		
City: Shreveport	County/Parish: Caddo	State: Louisiana



Photo #:	DSCN0674.jpg
Date:	7/26/2022
Camera:	Nikon COOLPIX AW120
Photographer:	Elizabeth Pham
Witness:	Elizabeth Pham, AD Talton, John Penland
Description: Bonzai Box Vac Line Overview	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 14

Location: Calumet Lubricants, 3333 Midway Avenue		
City: Shreveport	County/Parish: Caddo	State: Louisiana



Photo #:	DSCN0675.jpg
Date:	7/26/2022
Camera:	Nikon COOLPIX AW120
Photographer:	Elizabeth Pham
Witness:	Elizabeth Pham, AD Talton, John Penland
Description: Bonzai Box Vac Line Container – close-up	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 15

Location: Calumet Lubricants, 3333 Midway Avenue		
City: Shreveport	County/Parish: Caddo	State: Louisiana



Photo #:	DSCN0676.jpg
Date:	7/26/2022
Camera:	Nikon COOLPIX AW120
Photographer:	Elizabeth Pham
Witness:	Elizabeth Pham, AD Talton, John Penland
Description: Bonzai Box Vac Line – close-up of front label	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 16

Location: Calumet Lubricants, 3333 Midway Avenue		
City: Shreveport	County/Parish: Caddo	State: Louisiana



Photo #:	DSCN0677.jpg
Date:	7/26/2022
Camera:	Nikon COOLPIX AW120
Photographer:	Elizabeth Pham
Witness:	Elizabeth Pham, AD Talton, John Penland
Description: Bonzai Box Vac Line – close-up of back label	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 17

Location: Calumet Lubricants, 3333 Midway Avenue		
City: Shreveport	County/Parish: Caddo	State: Louisiana



Photo #:	DSCN0678.jpg
Date:	7/26/2022
Camera:	Nikon COOLPIX AW120
Photographer:	Elizabeth Pham
Witness:	Elizabeth Pham, AD Talton, John Penland
Description: Overview Bundle Shell (Left in photograph – horizontal tank structure)	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 18

Location: Calumet Lubricants, 3333 Midway Avenue		
City: Shreveport	County/Parish: Caddo	State: Louisiana



Photo #:	DSCN0679.jpg
Date:	7/26/2022
Camera:	Nikon COOLPIX AW120
Photographer:	Elizabeth Pham
Witness:	Elizabeth Pham, AD Talton, John Penland
Description: Close-Up Bundle Shell	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 19

Location: Calumet Lubricants, 3333 Midway Avenue		
City: Shreveport	County/Parish: Caddo	State: Louisiana



Photo #:	DSCN0680.jpg
Date:	7/26/2022
Camera:	Nikon COOLPIX AW120
Photographer:	Elizabeth Pham
Witness:	Elizabeth Pham, AD Talton, John Penland
Description: Close-Up of Bundles	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 20

Location: Calumet Lubricants, 3333 Midway Avenue		
City: Shreveport	County/Parish: Caddo	State: Louisiana



Photo #:	DSCN0681.jpg
Date:	7/26/2022
Camera:	Nikon COOLPIX AW120
Photographer:	Elizabeth Pham
Witness:	Elizabeth Pham, AD Talton, John Penland
Description: Two drums with unknown content - Overview	
Note: 7/29/22 Facility claims drums contain contaminated rock and debris	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 21

Location: Calumet Lubricants, 3333 Midway Avenue		
City: Shreveport	County/Parish: Caddo	State: Louisiana



Photo #:	DSCN0682.jpg
Date:	7/26/2022
Camera:	Nikon COOLPIX AW120
Photographer:	Elizabeth Pham
Witness:	Elizabeth Pham, AD Talton, John Penland
Description: Unknown Drums Close-Up	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 22

Location: Calumet Lubricants, 3333 Midway Avenue		
City: Shreveport	County/Parish: Caddo	State: Louisiana



Photo #:	DSCN0685.MOV
Date:	7/26/2022
Camera:	Nikon COOLPIX AW120
Photographer:	Elizabeth Pham
Witness:	Elizabeth Pham, AD Talton, John Penland
Description: Unknown Drums Label	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 23

Location: Calumet Lubricants, 3333 Midway Avenue		
City: Shreveport	County/Parish: Caddo	State: Louisiana



Photo #:	DSCN0686.jpg
Date:	7/26/2022
Camera:	Nikon COOLPIX AW120
Photographer:	Elizabeth Pham
Witness:	Elizabeth Pham, AD Talton, John Penland
Description: Opened Drum with Unidentified Liquid	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 24

Location: Calumet Lubricants, 3333 Midway Avenue		
City: Shreveport	County/Parish: Caddo	State: Louisiana



Photo #:	DSCN0688.jpg
Date:	7/26/2022
Camera:	Nikon COOLPIX AW120
Photographer:	Elizabeth Pham
Witness:	Elizabeth Pham, AD Talton, John Penland
Description: Roll-Off Box Overview	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 25

Location: Calumet Lubricants, 3333 Midway Avenue		
City: Shreveport	County/Parish: Caddo	State: Louisiana



Photo #:	DSCN0689.jpg
Date:	7/26/2022
Camera:	Nikon COOLPIX AW120
Photographer:	Elizabeth Pham
Witness:	Elizabeth Pham, AD Talton, John Penland
Description: Roll-Off Box Contents	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 26

Location: Calumet Lubricants, 3333 Midway Avenue		
City: Shreveport	County/Parish: Caddo	State: Louisiana



Photo #:	DSCN0690.jpg
Date:	7/26/2022
Camera:	Nikon COOLPIX AW120
Photographer:	Elizabeth Pham
Witness:	Elizabeth Pham, AD Talton, John Penland
Description: Roll-Off Box Number	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 27

Location: Calumet Lubricants, 3333 Midway Avenue		
City: Shreveport	County/Parish: Caddo	State: Louisiana



Photo #:	DSCN0691.jpg
Date:	7/27/2022
Camera:	Nikon COOLPIX AW120
Photographer:	Elizabeth Pham
Witness:	Elizabeth Pham, AD Talton, John Penland
Description: Sludge from Knockouts – Drum Overview	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 28

Location: Calumet Lubricants, 3333 Midway Avenue		
City: Shreveport	County/Parish: Caddo	State: Louisiana



Photo #:	DSCN0692.jpg
Date:	7/27/2022
Camera:	Nikon COOLPIX AW120
Photographer:	Elizabeth Pham
Witness:	Elizabeth Pham, AD Talton, John Penland
Description: Sludge from Knockouts – drum label	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 29

Location: Calumet Lubricants, 3333 Midway Avenue		
City: Shreveport	County/Parish: Caddo	State: Louisiana



Photo #:	DSCN0693.jpg
Date:	7/27/2022
Camera:	Nikon COOLPIX AW120
Photographer:	Elizabeth Pham
Witness:	Elizabeth Pham, AD Talton, John Penland
Description: Overview of Frac Tanks with two marked Non-Hazardous and two marked Hazardous	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 30

Location: Calumet Lubricants, 3333 Midway Avenue		
City: Shreveport	County/Parish: Caddo	State: Louisiana



Photo #:	DSCN0694.jpg
Date:	7/27/2022
Camera:	Nikon COOLPIX AW120
Photographer:	Elizabeth Pham
Witness:	Elizabeth Pham, AD Talton, John Penland
Description: Tank Label Waste Pending (Two pending analysis)	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 31

Location: Calumet Lubricants, 3333 Midway Avenue		
City: Shreveport	County/Parish: Caddo	State: Louisiana



Photo #:	DSCN0695.jpg
Date:	7/27/2022
Camera:	Nikon COOLPIX AW120
Photographer:	Elizabeth Pham
Witness:	Elizabeth Pham, AD Talton, John Penland
Description: Tank Label Demineralized Water – label on two tanks	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 32

Location: Calumet Lubricants, 3333 Midway Avenue		
City: Shreveport	County/Parish: Caddo	State: Louisiana



Photo #:	DSCN0696.jpg
Date:	7/27/2022
Camera:	Nikon COOLPIX AW120
Photographer:	Elizabeth Pham
Witness:	Elizabeth Pham, AD Talton, John Penland
Description: Catalyst Drums Overview in Out of Service (OOS) Area (Five drums)	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 33

Location: Calumet Lubricants, 3333 Midway Avenue		
City: Shreveport	County/Parish: Caddo	State: Louisiana



Photo #:	DSCN0697.jpg
Date:	7/27/2022
Camera:	Nikon COOLPIX AW120
Photographer:	Elizabeth Pham
Witness:	Elizabeth Pham, AD Talton, John Penland
Description: Catalyst Drum. Top rusted and contents exposed. Close-Up view.	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 34

Location: Calumet Lubricants, 3333 Midway Avenue		
City: Shreveport	County/Parish: Caddo	State: Louisiana



Photo #:	DSCN0698.jpg
Date:	7/27/2022
Camera:	Nikon COOLPIX AW120
Photographer:	Elizabeth Pham
Witness:	Elizabeth Pham, AD Talton, John Penland
Description: Catalyst Drums showing rusting.	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 35

Location: Calumet Lubricants, 3333 Midway Avenue		
City: Shreveport	County/Parish: Caddo	State: Louisiana



Photo #:	DSCN0699.jpg
Date:	7/27/2022
Camera:	Nikon COOLPIX AW120
Photographer:	Elizabeth Pham
Witness:	Elizabeth Pham, AD Talton, John Penland
Description: Catalyst Drums showing top rusted and exposed waste.	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 36

Location: Calumet Lubricants, 3333 Midway Avenue		
City: Shreveport	County/Parish: Caddo	State: Louisiana



Photo #:	DSCN0700.jpg
Date:	7/27/2022
Camera:	Nikon COOLPIX AW120
Photographer:	Elizabeth Pham
Witness:	Elizabeth Pham, AD Talton, John Penland
Description: Satellite Accumulation Hazardous Waste Overview (3 on pallet, 1 on ground in the back, 1 to the left of the area)	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 37

Location: Calumet Lubricants, 3333 Midway Avenue		
City: Shreveport	County/Parish: Caddo	State: Louisiana



Photo #:	DSCN0701.jpg
Date:	7/27/2022
Camera:	Nikon COOLPIX AW120
Photographer:	Elizabeth Pham
Witness:	Elizabeth Pham, AD Talton, John Penland
Description: Satellite Accumulation Hazardous Waste Carbon Disulfite (Opened)	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 38

Location: Calumet Lubricants, 3333 Midway Avenue		
City: Shreveport	County/Parish: Caddo	State: Louisiana



Photo #:	DSCN0702.jpg
Date:	7/27/2022
Camera:	Nikon COOLPIX AW120
Photographer:	Elizabeth Pham
Witness:	Elizabeth Pham, AD Talton, John Penland
Description: Satellite Accumulation Hazardous Waste FDA Waste (Opened)	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 39

Location: Calumet Lubricants, 3333 Midway Avenue		
City: Shreveport	County/Parish: Caddo	State: Louisiana



Photo #:	DSCN0703.jpg
Date:	7/27/2022
Camera:	Nikon COOLPIX AW120
Photographer:	Elizabeth Pham
Witness:	Elizabeth Pham, AD Talton, John Penland
Description: Satellite Accumulation Hazardous Waste MEK/Wax (Drum Closed)	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 40

Location: Calumet Lubricants, 3333 Midway Avenue		
City: Shreveport	County/Parish: Caddo	State: Louisiana



Photo #:	DSCN0704.jpg
Date:	7/27/2022
Camera:	Nikon COOLPIX AW120
Photographer:	Elizabeth Pham
Witness:	Elizabeth Pham, AD Talton, John Penland
Description: Satellite Accumulation Hazardous Waste Lab Sharps (Not latched close)	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 41

Location: Calumet Lubricants, 3333 Midway Avenue		
City: Shreveport	County/Parish: Caddo	State: Louisiana



Photo #:	DSCN0705.jpg
Date:	7/27/2022
Camera:	Nikon COOLPIX AW120
Photographer:	Elizabeth Pham
Witness:	Elizabeth Pham, AD Talton, John Penland
Description: Satellite Accumulation Hazardous Waste Contents Not Known (Opened)	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 42

Location: Calumet Lubricants, 3333 Midway Avenue		
City: Shreveport	County/Parish: Caddo	State: Louisiana



Photo #:	DSCN0706.jpg
Date:	7/27/2022
Camera:	Nikon COOLPIX AW120
Photographer:	Elizabeth Pham
Witness:	Elizabeth Pham, AD Talton, John Penland
Description: Rust on Drums, contents not known (2 Closed drums next to Satellite Accumulation Hazardous Waste)	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 43

Location: Calumet Lubricants, 3333 Midway Avenue		
City: Shreveport	County/Parish: Caddo	State: Louisiana



Photo #:	DSCN0707.jpg
Date:	7/27/2022
Camera:	Nikon COOLPIX AW120
Photographer:	Elizabeth Pham
Witness:	Elizabeth Pham, AD Talton, John Penland
Description: Vapor Phase Unit - Drum Overview with rust on top (contents not known)	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 44

Location: Calumet Lubricants, 3333 Midway Avenue		
City: Shreveport	County/Parish: Caddo	State: Louisiana



Photo #:	DSCN0708.jpg
Date:	7/27/2022
Camera:	Nikon COOLPIX AW120
Photographer:	Elizabeth Pham
Witness:	Elizabeth Pham, AD Talton, John Penland
Description: Vapor Phase Unit Drum – view with label	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 45

Location: Calumet Lubricants, 3333 Midway Avenue		
City: Shreveport	County/Parish: Caddo	State: Louisiana



Photo #:	DSCN0709.jpg
Date:	7/27/2022
Camera:	Nikon COOLPIX AW120
Photographer:	Elizabeth Pham
Witness:	Elizabeth Pham, AD Talton, John Penland
Description: Non-Hazardous Drums - contents not known.	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 46

Location: Calumet Lubricants, 3333 Midway Avenue		
City: Shreveport	County/Parish: Caddo	State: Louisiana



Photo #:	DSCN0710.jpg
Date:	7/27/2022
Camera:	Nikon COOLPIX AW120
Photographer:	Elizabeth Pham
Witness:	Elizabeth Pham, AD Talton, John Penland
Description: Non-Hazardous Drums with contents not know - close-up of label	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 47

Location: Calumet Lubricants, 3333 Midway Avenue		
City: Shreveport	County/Parish: Caddo	State: Louisiana



Photo #:	DSCN0711.jpg
Date:	7/27/2022
Camera:	Nikon COOLPIX AW120
Photographer:	Elizabeth Pham
Witness:	Elizabeth Pham, AD Talton, John Penland
Description: Sixteen unused amine product blue drums overview on west side of the Crude Unit (Count: 16)	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 48

Location: Calumet Lubricants, 3333 Midway Avenue		
City: Shreveport	County/Parish: Caddo	State: Louisiana



Photo #:	DSCN0712.jpg
Date:	7/27/2022
Camera:	Nikon COOLPIX AW120
Photographer:	Elizabeth Pham
Witness:	Elizabeth Pham, AD Talton, John Penland
Description: Unused amine product blue drums label	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 49

Location: Calumet Lubricants, 3333 Midway Avenue		
City: Shreveport	County/Parish: Caddo	State: Louisiana



Photo #:	DSCN0713.jpg
Date:	7/27/2022
Camera:	Nikon COOLPIX AW120
Photographer:	Elizabeth Pham
Witness:	Elizabeth Pham, AD Talton, John Penland
Description: Petroleum Distillates N.O.S. Metal Container Overview	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 50

Location: Calumet Lubricants, 3333 Midway Avenue		
City: Shreveport	County/Parish: Caddo	State: Louisiana



Photo #:	DSCN0714.jpg
Date:	7/27/2022
Camera:	Nikon COOLPIX AW120
Photographer:	Elizabeth Pham
Witness:	Elizabeth Pham, AD Talton, John Penland
Description: Petroleum Distillates N.O.S. Label	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 51

Location: Calumet Lubricants, 3333 Midway Avenue		
City: Shreveport	County/Parish: Caddo	State: Louisiana



Photo #:	DSCN0715.jpg
Date:	7/27/2022
Camera:	Nikon COOLPIX AW120
Photographer:	Elizabeth Pham
Witness:	Elizabeth Pham, AD Talton, John Penland
Description: Cleaner Tote Overview	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 52

Location: Calumet Lubricants, 3333 Midway Avenue		
City: Shreveport	County/Parish: Caddo	State: Louisiana



Photo #:	DSCN0716.jpg
Date:	7/27/2022
Camera:	Nikon COOLPIX AW120
Photographer:	Elizabeth Pham
Witness:	Elizabeth Pham, AD Talton, John Penland
Description: Cleaner Tote Label	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 53

Location: Calumet Lubricants, 3333 Midway Avenue		
City: Shreveport	County/Parish: Caddo	State: Louisiana

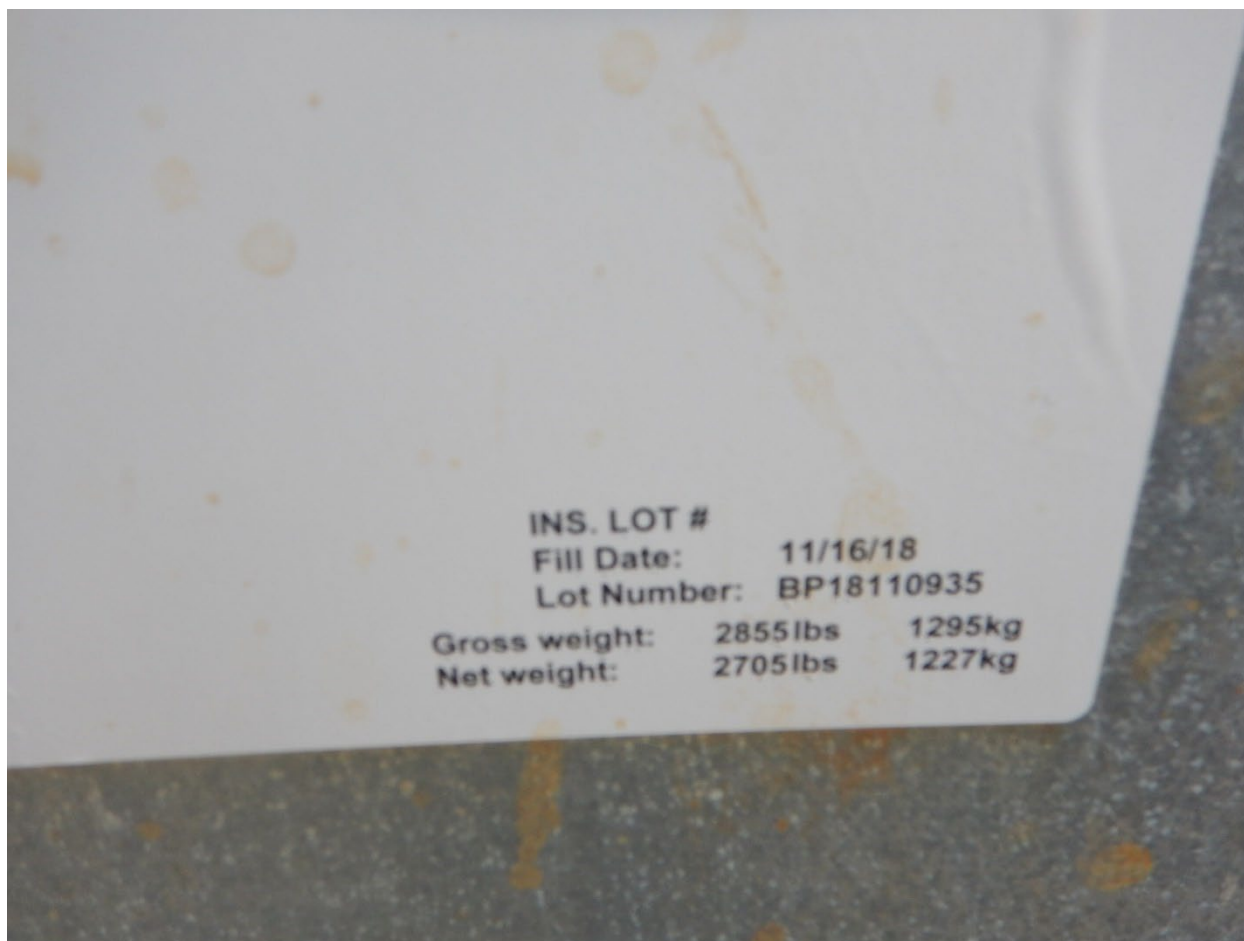


Photo #:	DSCN0717.jpg
Date:	7/27/2022
Camera:	Nikon COOLPIX AW120
Photographer:	Elizabeth Pham
Witness:	Elizabeth Pham, AD Talton, John Penland
Description: Cleaner tote label information - note date of 2018.	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 54

Location: Calumet Lubricants, 3333 Midway Avenue		
City: Shreveport	County/Parish: Caddo	State: Louisiana



Photo #:	DSCN0718.jpg
Date:	7/27/2022
Camera:	Nikon COOLPIX AW120
Photographer:	Elizabeth Pham
Witness:	Elizabeth Pham, AD Talton, John Penland
Description: 5-gallon pails of paint overview. No waste markings or accumulation date. On pallet on west side of the Crude Unit (6 large cans and 2 small)	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 55

Location: Calumet Lubricants, 3333 Midway Avenue		
City: Shreveport	County/Parish: Caddo	State: Louisiana



Photo #:	DSCN0719.jpg
Date:	7/27/2022
Camera:	Nikon COOLPIX AW120
Photographer:	Elizabeth Pham
Witness:	Elizabeth Pham, AD Talton, John Penland
Description: 8 Buckets - label #1 Zinc	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 56

Location: Calumet Lubricants, 3333 Midway Avenue		
City: Shreveport	County/Parish: Caddo	State: Louisiana



Photo #:	DSCN0720.jpg
Date:	7/27/2022
Camera:	Nikon COOLPIX AW120
Photographer:	Elizabeth Pham
Witness:	Elizabeth Pham, AD Talton, John Penland
Description: 8 Buckets - Label #2 CarboZinc	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 57

Location: Calumet Lubricants, 3333 Midway Avenue		
City: Shreveport	County/Parish: Caddo	State: Louisiana



Photo #:	DSCN0721.jpg
Date:	7/27/2022
Camera:	Nikon COOLPIX AW120
Photographer:	Elizabeth Pham
Witness:	Elizabeth Pham, AD Talton, John Penland
Description: Unknown White Drums Overview near unused amine product on west side of the Crude Unit (Count: 4)	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 58

Location: Calumet Lubricants, 3333 Midway Avenue		
City: Shreveport	County/Parish: Caddo	State: Louisiana



Photo #:	DSCN0722.jpg
Date:	7/27/2022
Camera:	Nikon COOLPIX AW120
Photographer:	Elizabeth Pham
Witness:	Elizabeth Pham, AD Talton, John Penland
Description: Unknown White Drums Label	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 59

Location: Calumet Lubricants, 3333 Midway Avenue		
City: Shreveport	County/Parish: Caddo	State: Louisiana



Photo #:	DSCN0723.jpg
Date:	7/27/2022
Camera:	Nikon COOLPIX AW120
Photographer:	Elizabeth Pham
Witness:	Elizabeth Pham, AD Talton, John Penland
Description: Rusty drum with unknown contents	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 60

Location: Calumet Lubricants, 3333 Midway Avenue		
City: Shreveport	County/Parish: Caddo	State: Louisiana



Photo #:	DSCN0724.jpg
Date:	7/27/2022
Camera:	Nikon COOLPIX AW120
Photographer:	Elizabeth Pham
Witness:	Elizabeth Pham, AD Talton, John Penland
Description: Rusted drum with unknown contents label	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 61

Location: Calumet Lubricants, 3333 Midway Avenue		
City: Shreveport	County/Parish: Caddo	State: Louisiana



Photo #:	DSCN0725.jpg
Date:	7/27/2022
Camera:	Nikon COOLPIX AW120
Photographer:	Elizabeth Pham
Witness:	Elizabeth Pham, AD Talton, John Penland
Description: DAF Storage Tank	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 62

Location: Calumet Lubricants, 3333 Midway Avenue		
City: Shreveport	County/Parish: Caddo	State: Louisiana



Photo #:	DSCN0726.jpg
Date:	7/27/2022
Camera:	Nikon COOLPIX AW120
Photographer:	Elizabeth Pham
Witness:	Elizabeth Pham, AD Talton, John Penland
Description: Float Tank Overview	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 63

Location: Calumet Lubricants, 3333 Midway Avenue		
City: Shreveport	County/Parish: Caddo	State: Louisiana



Photo #:	DSCN0727.jpg
Date:	7/27/2022
Camera:	Nikon COOLPIX AW120
Photographer:	Elizabeth Pham
Witness:	Elizabeth Pham, AD Talton, John Penland
Description: Float Tank Close-Up	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 64

Location: Calumet Lubricants, 3333 Midway Avenue		
City: Shreveport	County/Parish: Caddo	State: Louisiana



Photo #:	DSCN0728.jpg
Date:	7/27/2022
Camera:	Nikon COOLPIX AW120
Photographer:	Elizabeth Pham
Witness:	Elizabeth Pham, AD Talton, John Penland
Description: DAF Float Spill	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 65

Location: Calumet Lubricants, 3333 Midway Avenue		
City: Shreveport	County/Parish: Caddo	State: Louisiana



Photo #:	DSCN0729.jpg
Date:	7/27/2022
Camera:	Nikon COOLPIX AW120
Photographer:	Elizabeth Pham
Witness:	Elizabeth Pham, AD Talton, John Penland
Description: Unsecured, unlabeled drum with evidence of a leak/spill	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 66

Location: Calumet Lubricants, 3333 Midway Avenue		
City: Shreveport	County/Parish: Caddo	State: Louisiana



Photo #:	DSCN0730.jpg
Date:	7/27/2022
Camera:	Nikon COOLPIX AW120
Photographer:	Elizabeth Pham
Witness:	Elizabeth Pham, AD Talton, John Penland
Description: Bundle Pad Right Side View	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 67

Location: Calumet Lubricants, 3333 Midway Avenue		
City: Shreveport	County/Parish: Caddo	State: Louisiana



Photo #:	DSCN0731.jpg
Date:	7/27/2022
Camera:	Nikon COOLPIX AW120
Photographer:	Elizabeth Pham
Witness:	Elizabeth Pham, AD Talton, John Penland
Description: Bundle Pad Left Side View	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 68

Location: Calumet Lubricants, 3333 Midway Avenue		
City: Shreveport	County/Parish: Caddo	State: Louisiana



Photo #:	DSCN0732.jpg
Date:	7/27/2022
Camera:	Nikon COOLPIX AW120
Photographer:	Elizabeth Pham
Witness:	Elizabeth Pham, AD Talton, John Penland
Description: Bundle Pad Outside Stains on Wall	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 69

Location: Calumet Lubricants, 3333 Midway Avenue		
City: Shreveport	County/Parish: Caddo	State: Louisiana

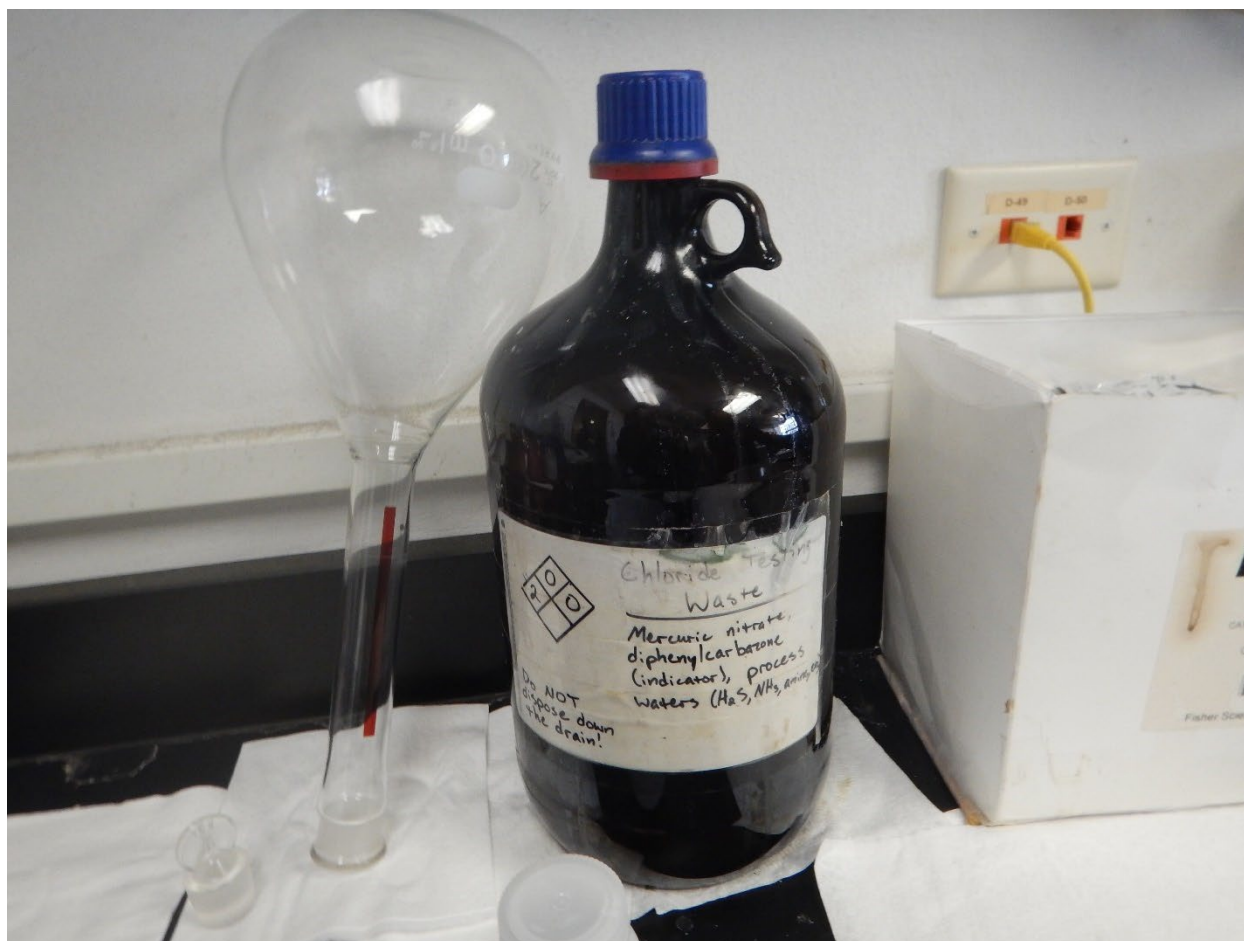


Photo #:	DSCN0733.jpg
Date:	7/27/2022
Camera:	Nikon COOLPIX AW120
Photographer:	Elizabeth Pham
Witness:	Elizabeth Pham, AD Talton, John Penland
Description: Chloride Testing Waste in Laboratory	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 70

Location: Calumet Lubricants, 3333 Midway Avenue		
City: Shreveport	County/Parish: Caddo	State: Louisiana



Photo #:	DSCN0734.jpg
Date:	7/27/2022
Camera:	Nikon COOLPIX AW120
Photographer:	Elizabeth Pham
Witness:	Elizabeth Pham, AD Talton, John Penland
Description: Unlabeled MEK Wax Waste Drum	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 71

Location: Calumet Lubricants, 3333 Midway Avenue		
City: Shreveport	County/Parish: Caddo	State: Louisiana

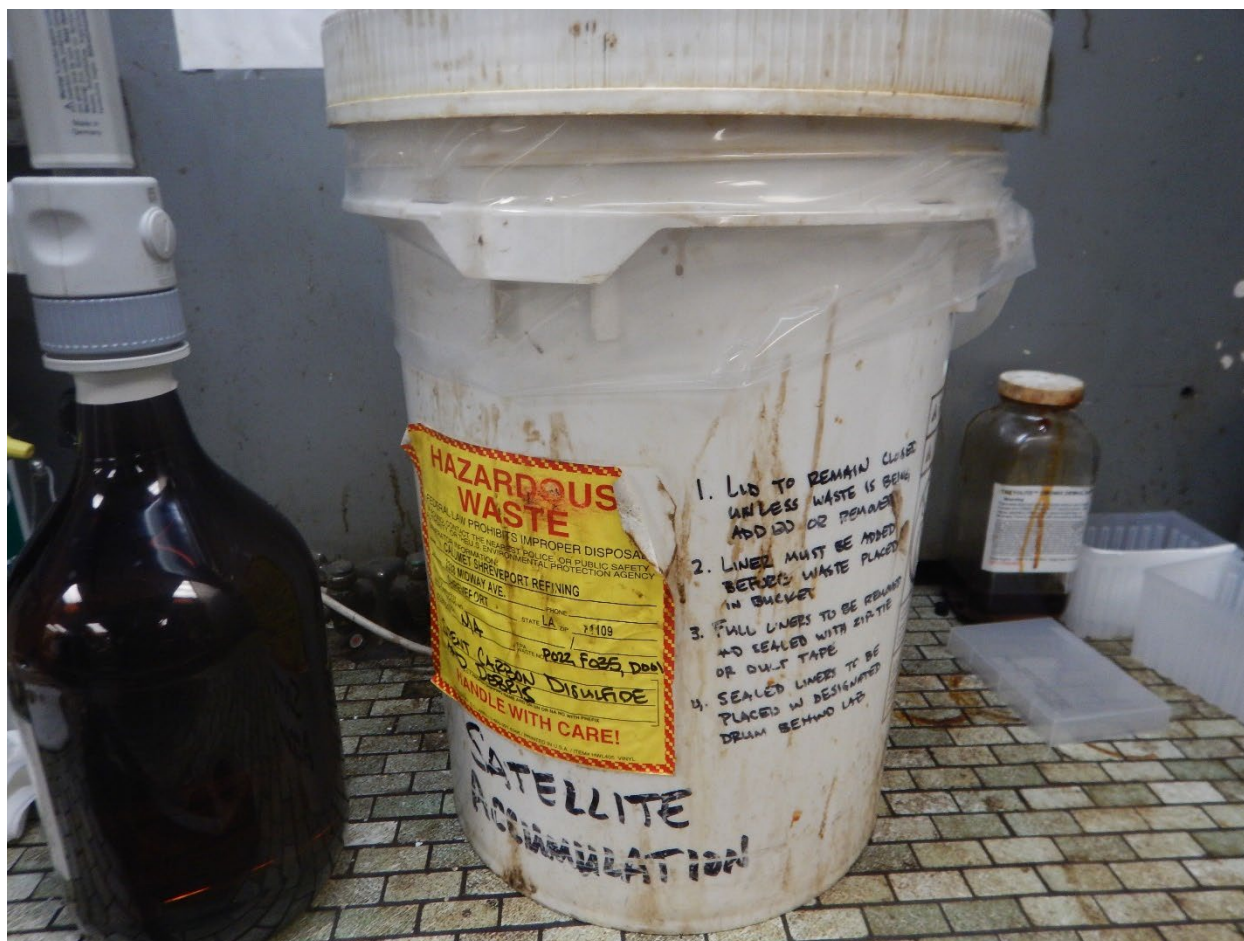


Photo #:	DSCN0735.jpg
Date:	7/27/2022
Camera:	Nikon COOLPIX AW120
Photographer:	Elizabeth Pham
Witness:	Elizabeth Pham, AD Talton, John Penland
Description: Satellite Accumulation Hazardous Waste Bucket in Laboratory	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 72

Location: Calumet Lubricants, 3333 Midway Avenue		
City: Shreveport	County/Parish: Caddo	State: Louisiana



Photo #:	DSCN0736.jpg
Date:	7/27/2022
Camera:	Nikon COOLPIX AW120
Photographer:	Elizabeth Pham
Witness:	Elizabeth Pham, AD Talton, John Penland
Description: Satellite Accumulation Label	

Appendix 2

Facility Diagram



Appendix 3

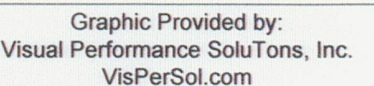
Central Waste Accumulation Area Container Inventory

Central Waste Accumulation Area - Container Inventory Taken on 7/26/2022

<u>Description</u>	<u>Count</u>	<u>Label</u>	<u>Generation Date</u>
Spent Carbon Canister (55-gallon drum)	1	Hazardous Waste	5/12/2022
Spent Carbon Canister (Overpack drum)	1	Hazardous Waste	5/2/2022
FDA (55-gallon drum)	1	Hazardous Waste	N/A (Is dated)
Carbon Disulfide (55-gallon drum)	2	Hazardous Waste	5/17/2022, 6/21/2022
Rachig Rings (55-gallon drum)	4	Hazardous Waste	5/17/2022
Contaminated PPE (Cubic yard bags)	3	Hazardous Waste	5/4/2022, 4/29/2022
Unused HS 022 (55-gallon drum)	4	N/A	N/A
Lab Sharps (55-gallon drum)	4	Non-Hazardous	1/17/2022, 2/18/2022, 2 drums N/A
Unused Criterion DN-3511 (55-gallon drum)	3	Non-Hazardous	N/A
Spent Catalyst Filters (55-gallon drum)	4	Hazardous Waste	6/21/2022
Lab Solvent (55-gallon drum)	1	Hazardous Waste	6/9/2022

Appendix 4

Process Flow Diagram



Appendix 5

Opening and Closing Conference Sign-In Sheets

Opening Conference: Tuesday, July 26, 2022

John Penland	US EPA Region 6	Penland.john@epa.gov
AD Talton	US EPA Region 6	Talton.adolphus@epa.gov
Elizabeth Pham	US EPA Region 6	Pham.elizabeth@epa.gov
Warren Williams	LDEQ	Warren.williams@la.gov
Brandon Brasuell	LDEQ	Brandon.brasuell@la.gov
Kristin Bahun	Calumet Lubricants	Kristin.bahun@clmt.com
Cedric McCall	Calumet Lubricants	Cedric.mccall@calumetspecialty.com

Closing Conference: Friday, July 29, 2022

John Penland	US EPA Region 6	Penland.john@epa.gov
AD Talton	US EPA Region 6	Talton.adolphus@epa.gov
Elizabeth Pham	US EPA Region 6	Pham.elizabeth@epa.gov
Warren Williams	LDEQ	Warren.williams@la.gov
Kristin Bahun	Calumet Lubricants	Kristin.bahun@clmt.com
Mark Cheesman	Calumet Specialty Products	Mark.cheesman@clmt.com
Chet Yeo	Calumet Lubricants	Chet.yeo@clmt.com
Billy McClain	Calumet Lubricants	
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Appendix 6

EPA Daily Summary E-mails

From: [Penland, John](#)
To: kristin.bahus@clmt.com; cedric.mccall@calumetspecialty.com; [Pham, Elizabeth](#); [Talton, Adolphus](#); brandon.brasuell@la.gov; warren.williams@la.gov
Cc: [Yurk, Jeffrey](#)
Subject: Daily Summary July 26, 2022 – RCRA CEI for Calumet Refinery in Shreveport, LA (LAD008052334)
Date: Tuesday, July 26, 2022 6:01 PM
Attachments: cbi form RCRA 2-19-20.pdf

All, here is a summary of my notes from today's inspection. If there are any errors or omissions please let me know.

Introduction

During the week of July 25, 2022, EPA and LDEQ inspectors will be conducting an unannounced inspection of the Calumet Refinery located at 3333 Midway Avenue in Shreveport, Louisiana for compliance with the Resource Conservation and Recovery Act (RCRA). This inspection is being conducted as part of the National Compliance Initiatives for air emissions from hazardous waste management and facilities located in Environment Justice communities. This inspection will include walkthroughs of the facility's waste generation and management units and a review of the facility records related to waste management

Inspection Attendees:

NAME	TITLE	REPRESENTING	PHONE	EMAIL
John Penland	Sr. Environmental Scientist – Lead Inspector	US EPA Region 6	214-665-9717	Penland.john@epa.gov
A.D. Talton	Sr. Environmental Scientist – Asst. Inspector	US EPA Region 6	214-665-6651	talton.adolphus@epa.gov
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Warren Williams	Waste Investigator	Louisiana Department for Environmental Quality		Warren.williams@la.gov

Brandon Brasuell	Waste Investigator	Louisiana Department for Environmental Quality		Brandon.brasuell@la.gov
Kristin Bahus	Environmental Manager	Calumet Specialty Products, LP		Kristin.bahus@clmt.com
Cedric McCall	Environmental Engineer	Calumet Specialty Products, LP		Cedric.mccall@calumetspecialty.com

Daily Summary

- Initial Entry to the facility – 09:05am
- Opening meeting start – 09:20am
 - I presented my credentials to Ms. Bahus and informed her that we were there to conduct an inspection of the facility under the authority of section 3007 of the Resource Conservation and Recovery Act
 - We discussed the authority for the inspection – RCRA Section 3007 - For purposes of developing or assisting in the development of any regulation or enforcing the provisions of this chapter, any person who generates, stores, treats, transports, disposes of, or otherwise handles or has handled hazardous wastes shall, upon request of any officer, employee or representative of the Environmental Protection Agency, duly designated by the Administrator, or upon request of any duly designated officer, employee or representative of a State having an authorized hazardous waste program, furnish information relating to such wastes and permit such person at all reasonable times to have access to, and to copy all records relating to such wastes. For the purposes of developing or assisting in the development of any regulation or enforcing the provisions of this chapter, such officers, employees or representatives are authorized—
 - (1)to enter at reasonable times any establishment or other place where hazardous wastes are or have been generated, stored, treated, disposed of, or transported from;
 - (2)to inspect and obtain samples from any person of any such wastes and samples of any containers or labeling for such wastes.
 - We discussed the purpose of EPA’s inspection – Assessment of Calumet’s compliance with its requirements under RCRA, including, but not limited to, the requirements for: waste determination and counting; waste marking; waste container management; use of the hazardous waste manifest; emergency planning; personnel training; and air pollution control requirements for hazardous waste units.
 - Discussed the right of Calumet to assert a Confidential Business Information claim for records requested by EPA (see attachment)

- Discussed the process for transferring electronic records – EPA has set up a Microsoft OneDrive folder with access limited to the inspection participants and other designated Calumet employees
 - One Drive Link : https://usepa-my.sharepoint.com/:f/g/personal/penland_john_epa_gov/Ej3pM1g5-p5Mu0C1vZ4H3tsBhxK_bOG9stsSJKPQJBdMUg
- Discussed the inspection process – the inspection will be conducted during normal business hours (8:00am to 3:00pm) July 26-29, 2022. The participants will meet at the facility to conduct the onsite portion of the inspection and discuss the findings of the ongoing records review. The records review will be conducted by the inspectors independently offsite throughout the week. Daily summaries will be provided by the inspectors at the end of each day to ensure a clear communication of questions and findings. The meeting Friday afternoon, July 29, 2022, will be reserved for a closing conference, where EPA will summarize the overall findings of the inspection to that point and provide a plan for concluding any unfinished evaluation.
- Presented the initial request for compliance records, including:
 - Hazardous waste notification form: 8700-12
 - A current Hazardous Waste Contingency Plan
 - Facility Maps
 - A facility process Diagram
 - Facility Waste Profiles
 - Any Hazardous Waste Manifests not previously uploaded to E-manifest
 - Any contract or agreement between the facility and any waste management company (TSDF)
 - Facility SOPs related to the generation or management of hazardous waste
 - RCRA Unit inspection records
 - CAA Title V and NSR permits for hazardous waste management units
- Meeting concluded with a safety briefing at approximately 10:45am
- Facility Walkthrough
 - Beginning at approximately 11:00 am
 - Central Waste Accumulation Area
 - Container Inventory
 - 1 – Spent Carbon Canister (55-gallon drum) – labeled hazardous waste – generated 5/12/2022
 - 1 – Spent Carbon Canister (Overpack drum) – labeled hazardous waste – generated 5/2/2022
 - 1 – FDA (55-gallon drum) – labeled hazardous waste – generated (dated but missing in notes)
 - 2 – Carbon Disulfide (55-gallon drum) – labeled hazardous waste – generated 5/17/2022 and 6/21/2022
 - 4 – Rachig Rings (55-gallon drum) – labeled hazardous waste – generated 5/17/2022
 - 3 – Contaminated PPE (Cubic yard bags) – labeled hazardous waste – generated 5/4/2022 and 4/29/2022
 - 4 – Unused HS 022 (55-gallon drum) – no waste label/determination – no generation date

- 4 – Lab Sharps (55-gallon drum) – labeled non-haz (need determination review) – generated 1/17/2022, 2/18/2022, 2x undated
- 3 – Unused Criterion DN-3551 (55-gallon drum) – labeled non-haz (need determination review, has combustible solid warning) – generated undated
- 4 – Spent Catalyst Filters (55-gallon drum) – labeled hazardous waste – generated 6/21/2022
- 1 – Lab Solvent (55-gallon drum) – labeled hazardous waste – generated 6/9/2022
- All containers initially appear to be in good condition and closed
- Containers are stored outdoors in direct sunlight. We will review the storage conditions for the wastes identified above.
- Identified 1 portable tank stored nearby, labeled as Spent Carbon, For Env Use Only rcvd 6/20
 - Calumet will research the source and use of this tank and whether it currently contains Spent Carbon
- Oil Sample ? Box
 - Unlabeled and Open
 - According to Kristin Bahus, this box receives process samples for return to the Crude process
- According to Kristin Bahus, sewer sumps observed during our walkthrough are cleaned annually.
- Visited the Bundle Cleaning Pad
 - The pad is extensively stained and solid material was present on this pad at the time of this inspection
 - The pad is surrounded by a 3-4 foot concrete wall which may allow material to be released from the pad during bundle cleaning. SOP requested
 - The exterior of the concrete wall has extensive staining
 - No accumulation of waste material was identified outside of the pad
- A frac-tank is located within the secondary containment area of Tank 60. Requested the use and contents
- Identified 3 open drums located in the tank farm immediately east of tank 112. These 2 of these drums were marked with weathered non-haz labels and the other was not labeled or covered. We have requested the identity of the material, generating process, and end-use of the material in these containers
- Identified 1 open roll-off container of material located near the wax hydrotreating area. The roll-off was not marked. We have requested the identity of the material, generating process, and end-use of the material in this container
- Additional documents requested during the walkthrough
 - SDS for Criterion DN-3551
 - SDS for HS-022
- Departed Facility at approximately 1:00pm

Planned activities for July 27, 2022

- Walkthrough of the Facility Process Units
- Walkthrough of the Laboratory
- Walkthrough of the WWTU
- Review of Waste Profiles

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Cc: [Yurk, Jeffrey](#)
Subject: Daily Summary July 27, 2022 – RCRA CEI for Calumet Refinery in Shreveport, LA (LAD008052334)
Date: Wednesday, July 27, 2022 10:13 PM

All, here is a summary of my notes from today's inspection. If there are any errors or omissions please let me know.

Inspection Attendees:

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James Desonier	Operations Manager	Calumet Specialty Products, LP		
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Daily Summary

- Inspection Start – Approximately 8:30am
- Facility Walkthrough
 - Beginning at approximately 9:00 am
 - Identified one 55-gallon drum of sludge from the knockout pots located near the MEK Unit. This container was marked as hazardous waste with an accumulation start date of 6/29/2022. Based on its location outside of the designated central accumulation area, we need to verify that this drum has been included in the facility's weekly <90-day container inspections.
 - On the eastern side of the MEK unit, we identified 4 frac tanks which were open. 2 were marked with non-hazardous waste stickers, 2 were marked with hazardous waste stickers and also with "pending analysis" signs. According to the facility representatives, these tanks were emptied and not in use. Each frac tank held an accumulation of liquid but this may have been precipitation. Due to the labeling and the presence of liquid inside the tanks we were not able to determine whether these frac tanks were actually out of service.
 - OOS Soy oil hydrotreating reactor – we identified five 55-gallon containers of unused catalyst for this process. According to James Desonier and Chet Yeo, this unit has been out of service for an extended period of time (will need an actual date of OOS). The containers storing this catalyst were in poor condition and we were able to see into the containers through the corroded lids. The containers were marked D202019, but we

were uncertain if this signified a production date. I raised the issue of speculative accumulation with Kristin Bahun and Calumet's counsel for this material and the facility will need to make a waste determination.

- Laboratory exterior waste accumulation area. – Identified three 55-gallon containers located underneath an awning south of the laboratory. 1 marked as FDA waste satellite accumulation, 1 marked as carbon disulfide waste satellite accumulation, 1 MEK Wax waste satellite accumulation. The FDA waste drum and the carbon disulfide waste drum were not equipped with a lock ring (closure devices for waste containers should be secured in the closed position). The MEK Wax drum was equipped with a lidded funnel that was latched at the time of this inspection.
- Next to the exterior laboratory waste drums we found two 55-gallon closed-head drums which were unlabeled and contained an unidentified material.
- Next to the East Diesel Salt Drum we observed a carbon canister which was in poor condition. The carbon canister was open and appeared to have been used. No waste markings were present.
- In the Vacuum unit we found 2 drums marked with non-haz waste labels but were also marked as "unknown?". We have requested a waste determination for the drums' contents.
- On the West side of the crude unit we found an accumulation of sixteen 55-gallon drums of an unused amine product. According to Chet Yeo and James Desonier, these are a product that the facility received but can not use in their process. No determination has been made for this material and we were unable to determine how long the amine product had been there. This material is being assessed under the definition of speculative accumulation and a waste determination will need to be made.
- In the same area as the drums noted above we found a pallet with an accumulation of what appeared to be 5-gallon pails of paint. No waste markings or accumulation dates were present on these containers and the facility will need to make a waste determination for this material.
- DAF management – DAF float from the petroleum refining industry is a listed waste with the waste code of K048. This waste is generated when it is removed from the DAF unit. The facility accumulates this waste in the Float Tank prior to pumping it to the Oily Sludge Thickener Tank where it is treated to remove excess water. At the time of this inspection, the pump associated with the Float Tank had released the DAF float into the secondary containment for the Float Tank due to a faulty seal. Calumet will need to address this release.
 - Applicability Review:
 - DAF Float (K048) is generated when it is removed from the DAF Unit.
 - The tanks used for the accumulation and treatment of the DAF float are part of a tank system that is subject to section 402 of the Clean Water Act.
 - 40 CFR 270.1(c)(2)(v) establishes an exemption from the hazardous waste permitting requirements for wastewater treatment units as defined in 40 CFR 260.10.
 - 40 CFR 260.10 defines a wastewater treatment unit as:
 - (1) Is part of a wastewater treatment facility that is subject to regulation under either section 402 or 307(b) of the Clean Water Act; and

- (2) Receives and treats or stores an influent wastewater that is a hazardous waste as defined in § 261.3 of this chapter, or that generates and accumulates a wastewater treatment sludge that is a hazardous waste as defined in § 261.3 of this chapter, or treats or stores a wastewater treatment sludge which is a hazardous waste as defined in § 261.3 of this Chapter; and
 - (3) Meets the definition of tank or tank system in § 260.10 of this chapter.
- Therefore, while the DAF Float is generated after removal from the DAF Unit, the accumulation and treatment tanks used for its management appear to be exempt from the RCRA permitting requirements as codified in 40 CFR 270.1(c)(2)(v). However, releases of this material are releases of hazardous waste and do not constitute a new point of generation for this waste.
- Bundle cleaning pad – we observed one 55-gallon drum of “sulfur waste” located on the bundle cleaning pad. This container was unlabeled and appeared to be in poor condition when first observed. Shortly after we arrived at the pad, an operator arrived with an over-pack drum to repackage this waste container. After the drum was placed in the over-pack drum, the operator placed a hazardous waste label on the container and marked the accumulation date as 7/27/2022. However, we are unable to confirm this date. Based on the condition of the container and the fact that it was unlabeled when first observed, we need to review both the waste determination and the accumulation start date for this container.
- Laboratory-
 - Identified one satellite accumulation container for chloride testing waste. According to the lab technician responsible for this container, they add its contents to the 55-gallon wax MEK drum located on the south side of the laboratory
 - Identified one 55-gallon drum used for the satellite accumulation of MEK waste. This drum was in service but unlabeled at the time of this inspection.
 - One other Satellite Accumulation container observed in a laboratory hood. Container labeled as Carbon disulfide (P022, D001, D035) satellite accumulation container. Waste is transferred to the 55-gallon Carbon Disulfide Satellite accumulation drum located south of the laboratory.
- Reviewed Daily Summary from 7/27/2022. No new information provided.
- Departed Facility at approximately 1:00pm

Planned activities for July 28, 2022

- Facility Process Overview – table top
- Review of Waste profiles and manifests
- Review of Contingency Plan and Emergency Planning
- Review of Facility Inspection records

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Cc: [Yurk, Jeffrey](#)
Subject: Daily Summary July 28, 2022 – RCRA CEI for Calumet Refinery in Shreveport, LA (LAD008052334)
Date: Thursday, July 28, 2022 9:14 PM

All, here is a summary of my notes from today's inspection. If there are any errors or omissions please let me know.

Inspection Attendees:

NAME	TITLE	REPRESENTING	PHONE	EMAIL
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Daily Summary

- Inspection Start – Approximately 8:05am
- Recap of Daily Summary Items from July 27 and 28, 2022
 - Calumet has shared the following documents:
 - Calumet's Hazardous Waste Contingency Plan
 - Waste Profiles for hazardous and non-hazardous waste
 - Calumet's Clean Air Act Title V permit
 - Facility Plot Map
 - WWTU diagram
 - Process Overview diagram
 - Annual Waste Reports for 2019-2021
 - <90-day hazardous waste inspection forms for January 4, 2019 through July 22, 2019
 - No additional information provided for the open concerns noted on July 27 and 28. According to Kristin Bahus, Calumet is preparing a response which will address all outstanding issues in a single document rather than addressing them piecemeal.
- Refinery Operations table top walkthrough
 - James Desonier led a table top explanation of the Refinery's production units
- General Facility Description:

Calumet Shreveport Refinery operates 24 hours per day, 7 days per week, 52 weeks a year as an oil refinery which processes crude oil by use of distillation, reforming, hydrofinishing, propane deasphalting, desulphurization, hydrogenation, solvent extraction, hydrotreating,

MEK dewaxing and treating process equipment to produce propane, butane, diesel, fuel oils, lubricating oil, wax, lubestocks, transformer oil, and asphalt. An Amine scrubbing unit removes H₂S from the fuel gas system and a Claus Sulfur Recovery Plant converts the recovered H₂S into molten sulfur for sale.

Feed stocks and finished products are stored in pressure tanks, floating roof tanks, cone roof tanks, and gas blanketed tanks. The feedstock is received by trailer truck, and rail car. The finished products are shipped by truck and rail cars. The feedstock is stored in internal and external floating roof tanks and fixed roof tanks.

Calumet Shreveport Refinery is engaged in the production of paraffinic lubes, fully refined petroleum waxes, naphthenic lube oils, and associated fuel products. Calumet Lubricants Company Shreveport Refinery has a maximum unit throughput capacity of approximately 65,000 barrels per day.

- Training Records
 - Requested records should demonstrate compliance with the requirements of 40 CFR 262.17(a)(7)
 - Records requested for the following personnel:
 - Laura Ellis
 - Brian Smith
 - Billy McClain
 - James Desonier
 - Kristi Shoemaker
 - Phillip Ambrose
 - Jason Brancamp
 - Cory Farris
 - Eileen Cronin
 - Michael Hall, Jr.
- Contingency Plan
 - According to Chet Yeo and Kristin Bahus, Calumet is currently in the process of revising its Hazardous Waste Contingency Plan to reflect its implementation of the ICS. Calumet has hired Heritage Environment Services to consult on these revisions
 - At the time of this inspection, the Hazardous Waste Contingency Plan is out of date. The plan provided to us was last revised in March of 2013. As a result the following sections are not accurate:
 - The Emergency Coordinator list
 - The Spill Response Team/Contractors
 - List of Emergency Response Personnel
 - The Plan references external documents and diagrams. We are requesting the following attachments:
 - Calumet Shreveport Refinery Procedure Number 00-h-0071.doc, "Hazardous Waste Containment & Handling," for procedures for handling hazardous wastes
 - Calumet Shreveport Refinery Procedure Number 00-h-0070.doc, "Hazardous Materials Spills & Immediate Response," for procedures for handling spills of hazardous wastes
 - Calumet Shreveport Refinery Procedure Number 00-h-0068.doc, "HAZWOPER" procedure for management of hazardous substance release
 - The current facility evacuation map
- Other Requested records:

- SOPs related to waste handling and transport
- SOPs related to <90-day inspections
- SOPs related to the generation of K050
- SDS for Criterion DN-3551
- SDS for 16 drums of amine located on western side of facility
- SDS for soy oil catalyst

Planned activities for July 29, 2022

- Training Records discussion
- Facility Inspection Discussion
- Follow-up on any outstanding issues
- Outstanding documents submittal timeline
- Closing Conference

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