

INSPECTION REPORT

Inspection Entry Date/Time	4/23/2025 11:50 AM (CT)	Announced: No (tenants and related facilities)
Inspection Exit Date/Time	4/23/2025 12:57 PM (CT)	Access: Granted
Regulatory Program	RCRA	
Type of Inspection	Compliance Evaluation Inspection (CEI)	
Facility or Site Name	Cooper Consolidated LLC	
Facility/Site Identifier	N/A	
Facility/Site Physical Address	5619 665-LA-628	
City, State, Zip Code	Laplace, LA 70068	
County/Borough	St. John the Baptist	
Generator Status	N/A	
NAICS	488320	
Type of Operation	Cooper Consolidated LLC (CC) operates as a stevedore on the Mississippi River, loading and unloading customer barges.	
Geographic Coordinates	30.049879, -90.475624	

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: 2025.06.11 13:42:02 -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
Safety Coordinator/CC	Shaun Harris	Shaun.Harris@cooperconsolidated.com	Yes	Yes
Loss Control/CC	Byron Borne	Byron.Borne@cooperconsolidated.com	Yes	Yes
Environmental Director	Blaine Petite	Blain.Petite@cooperconsolidated.com	Yes	Yes

Facility General Description

Tenant/Area	Inspection Date	Process Description	Area of Concern
Cooper Consolidated LLC	4/23/25	CC operates as a stevedore on the Mississippi River, loading and unloading customer barges. The facility does not maintain a MARPOL COA.	Yes

SECTION II – OBSERVATIONS

Facility: Cooper Consolidated LLC			
Section: 2.1	Date: 4/23/25, 11:50 AM	Contains AOC: Yes	Contains CBI: No
Lead Inspector: Vince Damiano	Attendees: Chad Paradee (Manager) and Andrew Mancuso (Engineering)		
CC, also known as Laplace Stevedore Warehouse, is located in Laplace, LA and provides stevedoring services on the Mississippi River. CC handles scrap metal, fertilizer, grains, iron, break bulk, and bundles of steel. It has three dockside cranes used to move products either from ship to barge or barge to ship, which belong to customers. Facility representatives stated that materials are never brought into the CC facility itself. All unloading and loading operations are done on the water. Mr. Petite stated that no waste, except for scrap dunnage, is ever brought back to the facility from any marine vessels. CC generates used oil from slops on their tugboats in addition to universal waste, such as batteries and aerosol cans. CC is not registered with the EPA as a hazardous waste generator. After the opening conference, the inspection team observed CC’s used oil storage area, universal waste warehouse, and the dock space. The used oil storage area consisted of 22 full 55-gallon drums of used oil filters and rags, one 500-gallon tank of used oil, and four full 55-gallon drums of used oil contaminated solids. All containers were labeled as “used oil”, however, the inspection team noted that one of the 55-gallon drums storing used oil was damaged and capped off with rags (see Appendix 1 – Photo 1) [AOC #1 – CC was storing used oil in a container that had visible structural damage – 40 CFR 279.22(b)(1)]. Next, the inspection team observed the warehouse where universal waste and aerosol can waste were stored. The inspection team observed a bundle of universal waste lamps stored on a shelf that were not labeled, were not stored in a container to prevent damage, and did not contain an accumulation start date to indicate residence time (see Appendix 1 – Photo 2) [AOC #2 – CC did not label a container or package in which lamps with one of the following phrases: “Universal Waste—Lamp(s),” or “Waste Lamp(s),” or “Used Lamp(s)” – 40 CFR 273.14(e)]; [AOC #3 – CC did not store universal waste lamps in a closed container that prevents damage or cause releases under reasonably foreseeable conditions – 40 CFR 273.13(d)(1)]; and accumulating [AOC #4 – CC did not demonstrate the length of time that the universal waste has been accumulated from the date it becomes waste – 40 CFR 273.15(c)]. The inspection team then observed the aerosol can puncturing system, which consisted of a can puncture unit affixed to the top of a 55-gallon drum used to collect the residual aerosol waste. The plastic bag, which was collecting the unpunctured aerosol cans, was stationed next to the drum (see Appendix 1 – Photo 3). The drum collecting the aerosol residual waste was not labeled; however, after the inspection, Mr. Petite stated the facility is a very small quantity generator of hazardous waste, therefore, no labeling requirements are required on the drum. The punctured aerosol cans are managed as scrap metal and sent for recycling. The			

inspection team then observed the dock space and noted no areas of concern (AOCs) in the area.

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 12:57 PM with CC personnel. The AOCs were communicated during the closing. Following the inspection on 4/30/2025, Mr. Petite sent a follow-up email in response to the AOCs observed during the inspection, including:

- Photos of universal waste lamps stored in a closed box with a label and a start date
- The used oil from the damaged drum was pumped out and moved into an undamaged drum.
- A photo of a labeled universal waste - aerosol can container for unpunctured aerosol cans
- A photo of a hazardous waste label on the aerosol can puncturing drum and a statement that CC is a VSQG under 40 CFR 262.10-14.

See the full response in 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: Cooper Consolidated LLC		
AOC #1 – CC was storing used oil in a container that had visible structural damage.	Citation: 40 CFR 279.22(b)(1)	Section: 2.1
AOC #2 – CC did not label a container or package in which lamps with one of the following phrases: “Universal Waste—Lamp(s),” or “Waste Lamp(s),” or “Used Lamp(s).”	Citation: 40 CFR 273.14(e)	Section: 2.1
AOC #3 – CC did not store universal waste lamps in a closed container that prevents damage or cause releases under reasonably foreseeable conditions.	Citation: 40 CFR 273.13(d)(1)	Section: 2.1
AOC #4 – CC did not demonstrate the length of time that the universal waste has been accumulated from the date it becomes waste.	Citation: 40 CFR 273.15(c)	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. 4/30/25 Cooper Consolidated email – Mr. Petite provided the inspection team with photos and explanations of corrections made towards AOCs observed.

SECTION VI – LIST OF APPENDICES

Appendix 1. Photograph Log

Appendix 2. 4/30/25 Response from Cooper Consolidated

APPENDIX 1.
PHOTOGRAPH LOG



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Location: Cooper Consolidated LLC		
City: Laplace	County/Parish: St. John the Baptist	State: Louisiana



Photo No. 1

Photo File Name: DSCN7971

Date of Photo: 4/23/2025

Time of Photo: 1228 hrs.

Photographer: Vince Damiano

Description: View of a full 55-gallon drum containing used oil that had visible structural damage inside the used oil storage area.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Location: Cooper Consolidated LLC		
City: Laplace	County/Parish: St. John the Baptist	State: Louisiana



Photo No. 2

Photo File Name: DSCN7972

Date of Photo: 4/23/2025

Time of Photo: 1230 hrs.

Photographer: Vince Damiano

Description: View of universal waste lamps stored on a shelf with no container or label inside the warehouse.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Location: Cooper Consolidated LLC		
City: Laplace	County/Parish: St. John the Baptist	State: Louisiana



Photo No. 3

Photo File Name: DSCN7973

Date of Photo: 3/23/2025

Time of Photo: 1233 hrs.

Photographer: Vince Damiano

Description: View of the aerosol can puncturing system and plastic bag accumulating unpunctured aerosol cans inside the warehouse.

APPENDIX 2.
4/30/25 RESPONSE FROM COOPER CONSOLIDATED

4/28/25

Laplace Stevedore Warehouse

EPA Site Inspection Follow Up

After action report, reported inspection deficiencies and remedies involved

Used Lamps, Universal Waste, No Label, Improperly Stored

Photo taken the afternoon of inspection, boxed and ready for transport to off-site accumulation point



Lamps transported next day and placed at accumulation site where they will stay until enough used lamps are collected to contact LEI, Inc., our universal waste vendor. LEI last picked up used lamps and E-waste on 4/17/25 from our accumulation site. Manifest available upon request.



Damaged Used Oil Drum



Damaged drum pumped into an undamaged drum and damaged drum removed by warehouse personnel. The empty drum was sent to Darrow Maintenance facility and triple rinsed in a permitted wash bay equipped with oil/water separator. Empty, clean drum was crushed and sent out as scrap metal.

Non-hazardous waste drums were collected by Mike's Filter, our non-haz waste vendor, on Friday, April 25th.

Aerosol Puncture Device Area and Retention Drum

A receptacle was added for accumulated but not yet punctured aerosol cans. Labels were applied to both the empty aerosol receptacle and also the residual waste drum connected to the puncture device.



The Laplace stevedore warehouse punctures less than (30) aerosol paint cans during its peak month. This is the only waste generated that can be considered hazardous in nature and it is an extremely small amount of residual waste. It puts this location well under the threshold and should be considered a Very Small Quantity Generator (40 CFR 262.10-14). Therefore, we do not have an EPA ID for this warehouse.

We have not generated enough waste in the drum since the addition of the puncture device so there are no hazardous waste manifests generated for this site.

I've also included the factory instructions for the proper use of the puncture device which are on-site. All warehouse personnel and supervision are trained in it's proper use through both practical and written training.



RE: Follow-up from EPA Visit on 4/23/2025

From Petite, Blaine <Blaine.Petite@cooperconsolidated.com>

Date Wed 4/30/2025 10:23 AM

To Vince Damiano <Vince.Damiano@erg.com>; Borne, Byron <Byron.Borne@cooperconsolidated.com>; Harris, Shaun <Shaun.Harris@cooperconsolidated.com>

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

 1 attachment (2 MB)

EPA Inspection Follow Up 4.29.25.docx;

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

Good morning,

Please see attached response with corrections and explanations for deficiencies found during the inspection of the Laplace Stevedore Warehouse on 4/23/25.

The Laplace stevedore warehouse punctures less than (30) aerosol paint cans during its peak month. This is the only waste generated that can be considered hazardous in nature and it is an extremely small amount of residual waste. It puts this location well under the threshold and should be considered a Very Small Quantity Generator (40 CFR 262.10-14). Therefore, we do not have an EPA ID for this warehouse.

Please let me know if you need more information.

Thanks,

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

Sent: Wednesday, April 23, 2025 4:36 PM

To: Petite, Blaine <Blaine.Petite@cooperconsolidated.com>; Borne, Byron <Byron.Borne@cooperconsolidated.com>; Harris, Shaun <Shaun.Harris@cooperconsolidated.com>

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

Subject: Follow-up from EPA Visit on 4/23/2025

EXTERNAL EMAIL: Please use caution when clicking links or downloading files. [CTS Postmaster]

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:

- A 55-gallon drum of used oil that was damaged
- Universal waste light bulbs not in a container, unlabeled, and non-dated

- 55-gallon drum of aerosol can residual waste not labeled
- Follow up on EPA ID

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 for the use of the intended recipient and may contain privileged and confidential information of this Company or its affiliates. If the reader of this message is not the intended recipient, or the employee or agent responsible to deliver it to the intended recipient, you are strictly prohibited from reviewing, forwarding, printing, copying, distributing or using this information in any way, and are hereby requested to contact the sender by reply email and destroy all copies of the original message.