

INSPECTION REPORT

Inspection Entry Date/Time	4/24/2025 11:30 AM (CT)	Announced: No (tenants and related facilities)
Inspection Exit Date/Time	4/24/2025 12:15 PM (CT)	Access: Granted
Regulatory Program	RCRA	
Type of Inspection	Compliance Evaluation Inspection (CEI)	
Facility or Site Name	Waste Connections Bayou Inc.	
Facility/Site Identifier	N/A	
Facility/Site Physical Address	500 Seven Oaks Blvd.	
City, State, Zip Code	Bridge City, LA 70094	
County/Borough	Jefferson	
Generator Status	N/A	
NAICS	562111	
Type of Operation	Waste Connections Bayou (WCB) collects solid waste, trash, and construction materials from businesses and residents.	
Geographic Coordinates	29.92721, -90.15179	

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 16:00:16 -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
Manager/Waste Connections Bayou	Buddy Gonlag	Bgonlag@wcnx.org	Yes	Yes

Facility General Description

Tenant/Area	Inspection Date	Process Description	Area of Concern
Waste Connections Bayou Inc.	4/24/25	WCB collects solid waste, trash, and construction materials from businesses and residents. The facility does not maintain a MARPOL COA.	Yes

SECTION II – OBSERVATIONS

Facility: Waste Connections Bayou Inc.			
Section: 2.1	Date: 3/27/25, 09:45 AM	Contains AOC: Yes	Contains CBI: No
Lead Inspector: Vince Damiano	Attendees: Buddy Gonlag (Manager)		
WCB, located in Birch City, LA, collects municipal solid waste, trash, construction debris, and demolition debris from businesses and residents. WCB operates 34 trucks, including rear-load, front-load, and roll-off types. When WCB collects waste, it is brought straight to the disposal site, typically to River Birch Landfill. Mr. Gonlag stated that waste is never brought back to the facility, and the only waste WCB generates is used oil and used batteries from maintenance on its trucks. WCB does not collect any waste from the Port of New Orleans or port-related facilities. WCB is not registered with the EPA. After the opening conference, the inspection team observed WCB’s maintenance area and equipment storage yard. In the maintenance area, the inspection team observed four 55-gallon drums of used oil, which were properly labeled as “Used Oil” and stored in closed 55-gallon drums. Next to the used oil drums, the inspection team observed a pallet of 14 spent lead-acid batteries generated from WCB’s trucks (see Appendix 1 – Photo 1). The batteries were not labeled and did not have an accumulation start date to suggest a residence time. At the time of the inspection, Mr. Gonlag stated the batteries are sent out to be recycled, but was uncertain under which program WCB is managing the spent batteries while on site [AOC #1 – <i>WCB did not label universal waste batteries (i.e., each battery), or a container in which the batteries are contained, with any one of the following phrases: “Universal Waste—Battery(ies),” or “Waste Battery(ies),” or “Used Battery(ies);” - 40 CFR 273.34(a)</i>]. The inspection team then walked through the equipment storage yard and did not observe any areas of concern (AOCs) in the area. The inspection team did not observe any additional 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 12:15 PM with Mr. Gonlag. The AOCs were communicated during the closing. Following the inspection on 5/1/2025, Mr. Gonlag sent a follow-up email in response to the AOCs observed during the inspection. In the response, Mr. Gonlag stated WCB is exempt from Universal Waste regulations under 40 CFR Part 273, as all used lead-acid battery cores are sent for credit and recycling per 40 CFR §266.80. Documentation of all battery shipments is maintained, and the cores present during the inspection have been removed and recycled. Photos of battery storage improvements and manifests for the shipments of batteries were included in the response (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: Waste Connections Bayou Inc.		
AOC #1 – WCB did not label universal waste batteries (i.e., each battery), or a container in which the batteries are contained, with any one of the following phrases: “Universal Waste—Battery(ies),” or “Waste Battery(ies),” or “Used Battery(ies).”	Citation: 40 CFR 273.34(a)	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. 5/1/25 WCB email – Mr. Gonlag provided the inspection team with a response to AOCs observed during the inspection.

SECTION VI – LIST OF APPENDICES

Appendix 1. Photograph Log

Appendix 2. 5/1/25 Response from WCB

APPENDIX 1.
PHOTOGRAPH LOG



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Location: Waste Connections Bayou Inc.		
City: Birch City	County/Parish: Jefferson	State: Louisiana



Photo No. 1

Photo File Name: DSCN7981

Date of Photo: 4/24/2025

Time of Photo: 1150 hrs.

Photographer: Vince Damiano

Description: View of a pallet of 14 spent lead-acid batteries being accumulated on a pallet in the maintenance area.

APPENDIX 2.
5/1/25 RESPONSE FROM WBC



WASTE CONNECTIONS
Connect with the Future®

April 30, 2025

RE: Response to Follow-Up Email from EPA Visit 4/24/2025

Sent via Email to: Vince.Damiano@erg.com

Dear Mr. Damiano,

Thank you for your recent visit to our facility on April 24, 2025. We appreciate the opportunity to discuss our operations and clarify our management practices.

In response to your email inquiry dated April 24, 2025, regarding the handling of used battery cores, we would like to confirm our understanding that the facility is exempt from the Universal Waste regulations under 40 CFR Part 273. This exemption applies because all used lead-acid battery cores are sent for credit and recycling in accordance with 40 CFR §266.80. These batteries are managed in compliance with applicable provisions for spent lead-acid batteries that are reclaimed and, therefore, are not subject to the Universal Waste Rule.

That said, following your visit, we have taken additional steps to enhance compliance by relocating the battery cores to a designated storage area with improved signage. Photos documenting this corrective action are included in the attached Photo Log.

We also maintain documentation of all battery shipments and ensure the cores are transported to an appropriate battery recycler or core processor. The battery cores onsite during the inspection have been removed and taken to a battery recycler. A copy of the receipt for the battery cores removed by Fleet Pride is included in the attached Photo Log.

Please let us know if any additional information or documentation is required.

Sincerely,

Buddy Gonlag

District Manager

Waste Connections of Louisiana, New Orleans

cc: Joe Viecei, Region Engineer, Waste Connections

Nikki Crews, Region Compliance Manager, Waste Connections





WASTE CONNECTIONS
Connect with the Future

PHOTOGRAPHIC LOG

Project Name: New Orleans EPA Site Visit – Lead Acid Battery Storage Response

Photograph No. 1

Date: 4-25-25

Comments:
New Battery Rack Storage
Area with signage



Photograph No. 2

Date: 4-25-25

Comments:
New Battery Rack Storage
Area (door open)



RE: Follow-up from EPA Visit on 4/24/2025

From Buddy Gonlag <buddy.gonlag@wasteconnections.com>

Date Thu 5/1/2025 10:51 AM

To Vince Damiano <Vince.Damiano@erg.com>

Cc Joe Watson <Joe.Watson@erg.com>; Thapa, Sandesh <Thapa.Sandesh@epa.gov>; Nikki Crews <Nikki.Crews@WasteConnections.com>; Joe Vieceleli <joe.vieceleli@wasteconnections.com>

 1 attachment (390 KB)

20250501_092547.pdf;

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

Mr. Damiano:

Please find attached our response to your recent inquiry following the inspection of our facility. Let us know if you have any questions or need additional information.

Thank you,
Buddy Gonlag

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

Sent: Thursday, April 24, 2025 5:54 PM

To: Buddy Gonlag <buddy.gonlag@wasteconnections.com>

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

Subject: Follow-up from EPA Visit on 4/24/2025

Hello Buddy,

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:

- Unlabeled and non-dated universal waste batteries

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