

INSPECTION REPORT

Inspection Entry Date/Time	04/15/2024 1:00 (CT)			Announced: No
Inspection Exit Date/Time	04/15/2024 2:00 (CT)			Access: Granted
Regulatory Program	RCRA			
Type of Inspection	Focused Compliance Inspection (FCI)			
Facility or Site Name	Dunham Price Group			
Facility/Site Identifier	LA0001014588			
Facility/Site Physical Address	210 Mike Hooks Rd			
City, State, Zip Code	Westlake, LA 70669			
County/Borough	Calcasieu Parish			
Generator Status	None			
NAICS	N/A			
Type of Operation	Dunham Price Group is a concrete manufacturing company.			
Geographic Coordinates	30.232592, -93.251989			
Additional Persons Participating in Inspection:				
Name	Title	Organization	Email	Phone
Elizabeth Pham	Inspector	EPA REGION 6	Pham.elizabeth@epa.gov	(214) 665-8354
Sandesh Thapa	Inspector	EPA REGION 6	Thapa.sandesh@epa.gov	(214) 665-2265
Anshul Paripati	Contractor	Eastern Research Group (ERG)	Anshul.Paripati@erg.com	(571) 535-1503
Lead Inspector:				
Cameron Tanaka				07/24/2024
	ERG	Cameron.Tanaka@erg.com	(703) 633-1632 ext. 11632	

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

Type of inspection: Focused Compliance Inspection (FCI)

The Port of Lake Charles and surrounding facilities were selected for inspection based on an Environmental Justice and Regional initiative to evaluate facilities at ports receiving or transporting Resource Conservation and Recovery Act (RCRA)-regulated hazardous wastes, and/or have an International Convention for the Prevention of Pollution from Ships (MARPOL) Annex V Certificate of Adequacy (COA) issued by the U.S. Coast Guard (USCG).

This report is based on information supplied by the facility representatives, inspector observations, port related facilities, and records including photographs taken (see Appendix 1), verbal or written statements made during or after the on-site inspection, and/or materials shown, demonstrated, or submitted to the EPA during or after the on-site inspection. In addition, information gathered prior to or after the inspection from a review of EPA, State, and public records may be included in this report.

Attendees

Title/Organization	Name	Phone	Email	Opening Conf.	Closing Conf.
Lead Inspector/ Contractor/ERG	Cameron Tanaka	(703) 633-1632 ext. 11632	Cameron.Tanaka@erg.com	Yes	No
RCRA Inspector/ Contractor/ERG	Anshul Paripati	(571) 535-1503	Anshul.Paripati@erg.com	Yes	Yes
Inspector/Enforcement Officer/EPA Region 6	Elizabeth Pham	(214) 665-8354	Pham.elizabeth@epa.gov	Yes	Yes
Inspector/Enforcement Officer/EPA Region 6	Sandesh Thapa	(214) 665-2265	Thapa.sandesh@epa.gov	Yes	Yes

Facility General Description

Tenant/Area	Inspection Date	Process Description	Area of Concern
Dunham Price Group	04/15/24	Dunham Price Group (DPG) is a concrete manufacturer. Their cement operations do not generate any hazardous waste. The only material they remove from ships is aggregates for their concrete manufacturing. DPG does not load ships. The facility has a MARPOL Annex I and V COA. According to facility personnel, none of the Annex I or V waste would cross their property. DPG personnel could not recall ever receiving waste from vessels.	Yes

SECTION II – OBSERVATIONS

Tenant: Dunham Price Group			
Section: 2.1	Date: 04/15/24, 1:00 PM	Contains AOC: Yes	Contains CBI: No
Lead Inspector: Cameron Tanaka	Attendees: Kevin Landreneau (Equipment Manager) and Jody Singletary (COO)		
DPG is a concrete manufacturer. Their cement operations do not generate any hazardous wastes. The facility has a stormwater discharge permit. The only material that they take off ships is aggregates for their concrete manufacturing, and they do not load ships. DPG has a MARPOL Annex I and V COA from the USCG and they have an EPA ID for stormwater discharges (LA0001014588). In the case of MARPOL services, no MARPOL waste would cross their property, and the facility personnel could not recall ever receiving MARPOL wastes from vessels. The facility generates waste in the form of used oil, used antifreeze/coolant, and used batteries. These wastes are all taken off site by third parties, and the batteries are recycled. Approximately every quarter, they generate about 300 to 400 gallons of used oil which are pumped into an aboveground metal tank and removed by third party vacuum trucks. Their used antifreeze is stored in a barrel with a screen over it taken off site by the same vendors. In a follow-up email response (see Appendix 2), Ms. Linda Ash included used oil shipping receipts (see Appendix 3). There were no issues noted by the inspection team with these receipts. During the inspection, the inspection team visually inspected the locations where waste is stored at the facility. The inspection team viewed DPG’s used oil tank and its secondary containment (see Appendix 1 – Photo 1, 2). The tank had a used oil label that was legible but faded. Ms. Ash included a photo of this used oil tank with a new label in her follow-up email (see Appendix 2, Appendix 4 – Photo 1). The inspection team also viewed the facility’s used antifreeze drum and noted that the label was not legible and the drum was not dated (see Appendix 1 – Photo 3) <u>AOC #1</u> – DPG did not label or mark clearly their used antifreeze with one of the following phrases: "Universal Waste- Antifreeze," or "Waste Antifreeze," or "Used Antifreeze."- La. Admin. Code tit. 33, § V-3823 A.8.; <u>AOC #2</u> – DPG did not provide a demonstration of the length of time that the universal waste has been accumulated from the date it becomes a waste or is received - La. Admin. Code tit. 33, § V-3825 C.]. Ms. Ash included a photo of this antifreeze drum with a new label in her follow-up email (see Appendix 2, Appendix 4 – Photo 2). The inspection team also noted that their used batteries were not properly labeled or dated <u>AOC #3</u> – DPG did not label or mark clearly their used batteries with any one of the following phrases: "Universal Waste-Battery(ies)," or "Waste Battery(ies)," or "Used Battery(ies)." - 40 CFR 273.14(a); <u>AOC #4</u> – DPG did not provide a demonstration of the length of time that the universal waste has been accumulated from the date it becomes a waste or is received - 40 CFR 273.15(c)]. Ms. Ash included a photo of this used battery area with a label above it in her follow-up email (see Appendix 2, Appendix 4 – Photo 3). No other apparent AOCs were observed by the inspection team the time of the inspection. A closing conference was conducted at approximately 1:50 PM with DPG personnel. The inspection team departed at 2:00 PM.			

SECTION III – RECORDS REVIEW

No RCRA regulated records reviewed during this focused onsite inspection.

SECTION IV – APPARENT AREAS OF CONCERN

The presentation of Area(s) of Concern does not constitute a formal compliance determination or violation.

Tenant: Dunham Price Group		
AOC #1 – DPG did not label or mark clearly their used antifreeze with one of the following phrases: "Universal Waste- Antifreeze," or "Waste Antifreeze," or "Used Antifreeze."	Citation: La. Admin. Code tit. 33, § V-3823 A.8.	Section: 2.1
AOC #2 – DPG did not provide a demonstration of the length of time that the universal waste has been accumulated from the date it becomes a waste or is received.	Citation: La. Admin. Code tit. 33, § V-3825 C.	Section: 2.1
AOC #3 – DPG did not label or mark clearly their used batteries with any one of the following phrases: "Universal Waste-Battery(ies)," or "Waste Battery(ies)," or "Used Battery(ies)."	Citation: 40 CFR 273.14(a)	Section: 2.1
AOC #4 – DPG did not provide a demonstration of the length of time that the universal waste has been accumulated from the date it becomes a waste or is received	Citation: 40 CFR 273.15(c)	Section 2.1

SECTION V – FOLLOW UP**Follow-Up**

Any facility follow-up items are as discussed in each facility's observations in Section II. Documents or files provided by the facilities were transmitted via email and included responses to areas of concern or provision of documents requested.

Communication Log

During and after the inspection, additional information was emailed to EPA including:

1. 04/23/24 DPG email – Linda Ash sent several photographs of corrective actions implemented at the site and the documents requested during the inspection.

SECTION VI – LIST OF APPENDICES

Appendix 1. Photograph Log

Appendix 2. Follow-Up Email from Dunham Price

Appendix 3. Used Oil Shipping Receipts from Dunham Price

Appendix 4. Follow-Up Photographs from Dunham Price

APPENDIX 1.
PHOTOGRAPH LOG



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 1

Location: Dunham Price Group		
City: Westlake	County/Parish: Calcasieu	State: Louisiana



Photo File Name: DSCN7173

Date of Photo: 04/15/2024

Time of Photo: 1:42 hrs.

Photographer: Anshul Paripati

Description: Overview of DPG's used oil tank directly outside of their main office building.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 2

Location: Dunham Price Group		
City: Westlake	County/Parish: Calcasieu	State: Louisiana



Photo File Name: DSCN7174

Date of Photo: 04/15/2024

Time of Photo: 1:43 hrs.

Photographer: Anshul Paripati

Description: Overview of DPG's used oil tank with its secondary containment directly outside of their main office building.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 3

Location: Dunham Price Group		
City: Westlake	County/Parish: Calcasieu	State: Louisiana



Photo File Name: DSCN7175

Date of Photo: 04/15/2024

Time of Photo: 1:49 hrs.

Photographer: Anshul Paripati

Description: DPG's 55-gallon used antifreeze drum with an unclear label in the facility's maintenance shop.

APPENDIX 2.
FOLLOW-UP EMAIL FROM DUNHAM PRICE

EPA Inspection

Linda Ash <lash@dunhamprice.com>

Tue 2024-04-23 10:45 AM

To: Cameron Tanaka <Cameron.Tanaka@erg.com>; Anshul Paripati <Anshul.Paripati@erg.com>; Joe Watson <Joe.Watson@erg.com>; Thapa, Sandesh <Thapa.Sandesh@epa.gov>; Pham, Elizabeth <Pham.Elizabeth@epa.gov>; Ramrakha, Jayshika <Ramrakha.Jayshika@epa.gov>; Pandak, Debra (she/her/hers) <Pandak.Debra@epa.gov>
Cc: Jody Singletary <jsingletary@dunhamprice.com>; Kevin Landreneau <klandreneau@dunhamprice.com>

 7 attachments (18 MB)

FW: Crystal Clean Packing Slips/BOL; Certificate of Adequacy ; Attached Image; 20240423_081809 (002).jpg; 20240423_081809 (002).jpg; 20240423_082624 (002).jpg; 20240423_090928.jpg;

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

Cameron

Here are the documents and corrective actions addressing the list of items from the Inspection conducted on 4/15/2024 as per your request.

If there is anything else needed please don't hesitate to call or email.

Thanks



Linda Ash

Dunham Price Group, LLC

Safety Director

CSST/COSS

(337) 433-3900 office

(337) 436-4434 fax

(337) 377-3997 cell

www.dunhamprice.com/jobs

This communication, including attachments, is confidential, may be subject to legal privileges, and is intended for the sole use of the addressee. Any use, duplication, disclosure or dissemination of this communication, other than by the addressee, is prohibited. If you have received this communication in error, please notify the sender immediately and delete or destroy this communication and all copies.

APPENDIX 3.
USED OIL SHIPPING RECEIPTS FROM DUNHAM PRICE

Heritage - Crystal Clean, LLC

877-938-7948

www.crystal-clean.com



WORK ORDER NBR: 00-00PTX2W

****THIS IS NOT AN INVOICE****

SERVICE REQUEST NBR: 356401

CUSTOMER ID NBR: 278200

COMMENTS: Prices reflect changes effective 12/7/2023

EMERGENCY NBR: 800-424-9300 (CHEMTREC CON10430)

(for accidents/spills)

DATE: 3/20/2024 7:56:01 AM

CRYSTAL CLEAN REPRESENTATIVE: ANTHONY WAGUESPACK

CUSTOMER/SHIPPER:

DUNHAM PRICE GROUP, LLC

210 MIKE HOOKS ROAD

WESTLAKE, LA 70669

CONTACT NAME : SCOTT WENDHAND (337)439-4088

GEN. STATUS: VSQG

FEDERAL EPA ID NBR:

STATE EPA ID NBR:

COMMENTS:

DESTINATION:

HERITAGE-CRYSTAL CLEAN, LLC

697 HIGHWAY 167

OPELOUSAS, LA 70570

Phone Number: 877-938-7948

CARRIER: HERITAGE-CRYSTAL CLEAN, LLC

Phone Number: (847)836-5670

EPA ID NBR: ILR000130062

TRANSPORTER STATE ID:

BILL OF LADING

NON-DOT REGULATED USED OIL/OILY WATER, 310 gal

NON-DOT REGULATED USED OIL/OILY WATER, 15 gal

DETAILS

Item	Description	Qty	Price	Subtotal	
306	USED OIL SERVICE	310	0.10	31.00	PAY
Interval: 12 Week					
Next service date: 3/21/2025 (UPDATED)					
Ws Nbr:10-54-305/306/11					
316	BS&W	15	0.00	0.00	PAY
Ws Nbr:10-54-305/306/11					
310	TRIP FEE - USED OIL	1	0.00	0.00	CHARGE

Net Payment: \$ 31.00

Tax: \$ 0.00

Total Payment: \$31.00

Prices reflect changes effective 12/7/2023

PO# 80019

This is to certify that the above-named materials are properly classified, described, packaged, marked, and labeled and are in proper condition for transport according to the applicable regulations of the Department of Transportation, as required. I also certify that neither hazardous waste, nor PCB's have been mixed with the used oil or parts cleaner solvent (if applicable).

Customer also hereby verifies that the above services were performed and that said services and the charges therefor are hereby accepted. Customer also hereby reaffirms the accuracy and completeness of all information contained in this work order and all documentation previously submitted to HCC. This work order is deemed part of the service agreement between Heritage-Crystal Clean, LLC and the certifications contained therein concerning the materials to be handled and the services to be provided are incorporated herein by reference and deemed part hereof and said certifications are deemed to be made for the services covered by this work order. All said-for used oil is not of any deductions for water, sediment or other non-oil elements in your waste stream.

CUSTOMER SIGNATURE

MAINTENANCE

DEPT. MC

DATE 3/21/24

REC'D BY MA

UNITED 2608

681168

Heritage - Crystal Clean, LLC

877-938-7948

www.crystal-clean.com



WORK ORDER NBR: 00-00PGWHS

****THIS IS NOT AN INVOICE****

SERVICE REQUEST NBR: 356401

CUSTOMER ID NBR: 278200

COMMENTS: Prices reflect changes effective 12/7/2023

EMERGENCY NBR: 800-424-9300 (CHEMTREC CON10430)

(for accidents/spills)

DATE: 1/30/2024 10:18:08 AM

CRYSTAL CLEAN REPRESENTATIVE: ANTHONY WAGUESPACK

CUSTOMER/SHIPPER:

DUNHAM PRICE GROUP, LLC

210 MIKE HOOKS ROAD

WESTLAKE, LA 70669

CONTACT NAME : SCOTT WENDHAND (337)439-4088

GEN. STATUS: VSQG

FEDERAL EPA ID NBR:

STATE EPA ID NBR:

COMMENTS:

DESTINATION:

HERITAGE-CRYSTAL CLEAN, LLC

697 HIGHWAY 167

OPELOUSAS, LA 70570

Phone Number: 877-938-7948

CARRIER: HERITAGE-CRYSTAL CLEAN, LLC

Phone Number: (847)836-5670

EPA ID NBR: ILR000130062

TRANSPORTER STATE ID:

BILL OF LADING

NON-DOT REGULATED USED OIL/OILY WATER, 930 gal
(USED ANTIFREEZE), 80 gal

Please fill in

NON-DOT REGULATED USED OIL/OILY WATER, 45 gal

DETAILS

Item Description	Qty	Price	Subtotal	
306 USED OIL SERVICE	930	0.10	93.00	PAY
Interval: 12 Week				
Next service date: 1/31/2025 (UPDATED)				
Ws Nbr:10-54-305/306/11				
304 USED ANTIFREEZE	80	0.00	0.00	CHARGE
Interval: 10 Week				
Next service date: 1/31/2025 (UPDATED)				
316 BS&W	45	0.00	0.00	PAY
Ws Nbr:10-54-305/306/11				
310 TRIP FEE - USED OIL	1	0.00	0.00	CHARGE

Net Payment: \$ 93.00

Tax: \$ 0.00

Total Payment: \$93.00

*****Prices reflect changes effective 12/7/2023*****

This is to certify that the above named materials are properly identified, described, packaged, marked, and labeled and are in proper condition to be transported according to the applicable regulations of the Department of Transportation. I also certify that neither hazardous wastes nor PCB's have been mixed with the used oil in the waste stream (where applicable).

Customer also hereby certifies that the above services were performed and that said services and the charges therefor are hereby accepted. Customer also hereby reaffirms the accuracy and completeness of all information contained in this work order and all documentation previously submitted to HCC. This work order is deemed part of the service agreement between Heritage-Crystal Clean, LLC and the certifications contained therein concerning the materials to be handled and the services to be provided are incorporated herein by reference and deemed part hereof and said certifications are deemed made for the services covered by this work order. All said-for used oil is net of any deductions for water, sediment or other non-oil elements in your waste stream.

CUSTOMER SIGNATURE

MAINTENANCE CENTER, LLC

DATE 1/31/24
BY [Signature]
UNIT NO. [Signature]
681177

APPENDIX 4.
FOLLOW-UP PHOTOGRAPHS FROM DUNHAM PRICE



A red fire extinguisher with a white label. The label features the brand name 'SimplexGrinnell' at the top, followed by the word 'FIRE' in large, bold, red letters. Below 'FIRE', the word 'EXTINGUISHER' is written in smaller, red, all-caps letters. The entire label is set against a white background with a red border. The extinguisher itself is a standard red metal cylinder with a black handle and a black hose.

WASTE
COOLANT

[illegible]

21312
GBC4

NOTICE
Used Battery
Cores

LAST PICK UP
4-1-24

