

EPA REGION 6 Enforcement Division

INSPECTION REPORT

Inspection Entry Date/Time	4/15/2024 09:15 AM (CT)	Announced: No		
Inspection Exit Date/Time	4/15/2023 3:45 PM (CT) Closing Conference	Access: Granted		
Regulatory Program	RCRA			
Type of Inspection	Focused Compliance Inspection (FCI)			
Facility or Site Name	PMI Environmental Services			
Facility/Site Identifier	LAR000102391			
Facility/Site Physical Address	228 16 th St			
City, State, Zip Code	Golden Meadow, LA 70357			
County/Borough	Lafourche Parish			
Generator Status	Large Quantity Generator (LQG)			
NAICS	<u>213112</u>			
Type of Operation	Support Activities for Oil and Gas Operations			
Geographic Coordinates	29.12075, -90.20055			
Mailing Address/Secondary Address	N/A			
City, State, Zip Code	N/A			
Permit Number (If Applicable)	Not Applicable			
Additional Persons Participating in Inspection:				
Name	Title	Organization	Email	Phone
Joyce Johnson	Inspector	EPA Region 6	Johnson.Joyce-r6@epa.gov	(214) 665-8548
Dedriel Gardner	Inspector	EPA Region 6	Gardner.Dedriel@epa.gov	(281) 983-2133
George Wieber	Contractor	Eastern Research Group (ERG)	George.Wieber@erg.com	443-883-5253
Lead Inspector:				
Brook McKeown				9/11/2024
	ERG		Brook.McKeown@erg.com	(410) 459-5811

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

Port Fourchon 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/ Contactor/ERG	Brook McKeown	(410) 459-5811	Brook.McKeown@erg.com	Yes	Yes
RCRA Inspector/ Contractor/ERG	George Wieber	443-883-5253	George.Wieber@erg.com	Yes	Yes
Inspector/Enforcement Officer/EPA Region 6	Joyce Johnson	(214) 665-8548	Johnson.Joyce-r6@epa.gov	Yes	Yes
Inspector/Enforcement Officer/EPA Region 6	Dedriel Gardner	(281) 983-2133	Gardner.Dedriel@epa.gov	Yes	Yes

Facility General Description

Tenant/Area	Inspection Date	Process Description	Area of Concern
PMI Environmental Services	4/15/24	PMI Environmental Services (PMI) washes RCRA-empty containers and marine vessels. PMI provides washing services for containers and vessels managing RCRA-exempt Exploration and Production (E&P) materials (e.g., drilling muds) as well as non-E&P wastes. PMI also paints and maintains frac tanks used onsite. The site operates as a large quantity generator (LQG) of hazardous wastes and a transfer facility. Waste received onsite for 10-day transfer is typically transferred into smaller containers to facilitate transportation to the destination facility. The facility has applied for a MARPOL COA.	Yes

SECTION II – OBSERVATIONS**Tenant:** PMI Environmental Services**Section:** 2**Date:** 4/15/24, 9:15 A.M.**Contains AOC:** Yes**Contains CBI:** No**Lead Inspector:** Brook McKeown**Attendees:** Ernest Richoux (Operations Manager), Ralph Breaux (Facility Manager), Bryant Meyer (Environmental Consultant, joined by phone), Keith Mazique (OSV Operations), and Joseph Bush (Technician)

Facility personnel provided the inspection team with an overview of operations at PMI. PMI primarily cleans RCRA-empty vessels and containers that previously contained E&P wastes or raw materials. Clients will notify PMI when a cleaning service is requested, and the client notifies PMI whether the vessel contained E&P material or not. Within the past one or two years, PMI also began operating as a 10-day transfer facility for hazardous wastes. Transfer operations at PMI involve receiving manifested hazardous waste containers via truck, pumping the hazardous waste into smaller containers that destination facilities will accept, and then cleaning the containers that were initially received onsite. PMI uses third party companies to transport the hazardous waste on and offsite via truck for the 10-day transfer operations. Washwater generated from PMI operations is accumulated in containers, sampled and profiled, and managed as hazardous or nonhazardous waste depending upon analytical results. PMI is a LQG of hazardous waste (EPA ID LAR000102391).

After the opening meeting, the inspection team conducted a visual walkthrough of the facility and dock area. Observations and apparent AOCs are listed below.

- The inspection team observed the cleaning system for vessels, which included multiple frac tanks used to recycle washwater. There were two sets of frac tanks dedicated to washing vessels that managed E&P waste and another set of frac tanks dedicated to non-E&P washing. Facility personnel stated that the frac tanks for non-E&P washing were not fully operational (see Appendix 1 – Photos 1 through 3). No apparent AOCs were observed in these areas at the time of the inspection.
- The inspection team observed the painting and cleaning area for the frac tanks (see Appendix 1 – Photos 4 and 6). PMI conducts sponge blasting in the area to remove old paint from frac tanks and uses spray coating methods. Facility personnel stated that there is no paint waste from cleaning spray equipment since paint thinner is recycled back into the paint for reuse. In the area, the inspection team observed cuts and tears in the tarp directly open to the ground, which may allow paint chips or fugitive paint spray to be released to the environment (see Appendix 1 – Photo 5). It is uncertain whether paint chips or spray could be characterized as hazardous waste during any use of the area [**AOC #1:** *The painting and cleaning area for frac tanks was not operated to minimize the release of waste, potentially hazardous waste, to the environment. – 40 CFR 262.251*]. PMI did provide analytical data to show that blast media and paint chips sampled from the area was not hazardous based on metals content (see follow-up responses at the end of this section). It is uncertain whether the material sampled is representative of any future waste that will be generated in the area.
- The inspection team visited the staging area designated for containers of product and nonhazardous washwater (see Appendix 1 – Photos 17 and 18). PMI personnel label and place containers of washwater in the area as either nonhazardous waste or waste pending analysis. A contractor from BEOM, Mr. Bush at the time of the inspection, then samples the containers of washwater and uses the analytical results to make a waste determination for each container. After a determination is made, the BEOM contractor places another label on the container for whether it is hazardous or

nonhazardous. Mr. Bush, stated that they always sample washwater to make a waste determination. During the inspection, the inspection team observed one 55-gallon drum with both a nonhazardous waste label from PMI and a hazardous waste label from BEOM (see Appendix 1 – Photos 9 through 11), one 55-gallon drum with a PMI label that was illegible (see Appendix 1 – Photos 7 and 8), several 55-gallon drums with only a PMI label and pending analysis – including one dated on 12/31/23 (see Appendix 1 – Photos 14 and 15), and 55-gallon drums without any label (see Appendix 1 – Photo 16) [**AOC #2: Containers holding waste pending analysis, or potentially hazardous waste, were either unlabeled or did not have clear labeling indicating the material as hazardous waste or hazardous waste pending analysis – 40 CFR 262.17(a)(5)(i)**]. Several of the containers were also labeled as hazardous waste (see Appendix 1 – Photos 12 and 13). Additionally, the containers of hazardous waste or hazardous waste pending analysis were staged alongside nonhazardous wastes on pallets on the ground outside of the central accumulation area (CAA) [**AOC #3: Hazardous waste and wastes pending analysis were not managed in the CAA, so it is uncertain if inspection requirements and emergency preparedness requirements were met for these wastes. – 40 CFR 262.17(a)(1)(v) and 40 CFR 262.252**].

- The inspection team observed several cigarette butts on the ground near the CAA and 10-day transfer area where ignitable wastes are managed (see Appendix 1 – Photos 19 through 23) [**AOC #4: There were signs of personnel smoking cigarettes as potential sources of ignition near where ignitable hazardous waste is accumulated and handled – 40 CFR 262.17(a)(1)(vi)(B)**].
- The inspection team also observed the staging area for incoming RCRA-empty containers as well as a cargo shipping container where paints and thinner are stored, and no issues were noted at the time of the inspection.

The inspection team did not observe other areas of concern at the time of the inspection. A closing conference was conducted at approximately 3:30 PM with PMI personnel. The AOCs were communicated during the closing and follow-up email from the inspection team the same day; however, further EPA review may change or add to the facility's potential AOCs.

Following the inspection, the inspection team requested additional documentation as well as any responses to address the apparent AOCs identified. PMI provided the requested documentation and responses via email on 4/30/2024. PMI's email response can be found in Appendix 2. The email response and attachments addressed the following.

- Blast media and paint chips sampled from the frac tank painting and cleaning area were shown to be nonhazardous according to analytical data (Appendix 3).
- PMI provided a letter from LDEQ acknowledging their status as a hazardous waste transfer facility (Appendix 4).
- PMI provided photographs showing new signage for designated waste pending analysis areas as well as photographs of a label printer that was purchased (Appendix 5). PMI purchased the label printer to prevent label fading or illegible labels. PMI also stated in their email that containers pending analysis or mislabeled during the inspection were moved to the proper storage area and labeled.
- PMI stated in their email response that they conducted a meeting with employees to address smoking in and around the hazardous waste storage area, and that there are plans to build designated smoking areas in a separate area of the facility.

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.

Tenant: PMI Environmental Services		
AOC #1 – The painting and cleaning area for frac tanks was not operated to minimize the release of waste, potentially hazardous waste, to the environment.	Citation: 40 CFR 262.251	Section: 2
AOC #2 – Containers holding waste pending analysis, or potentially hazardous waste, were either unlabeled or did not have clear labeling indicating the material as hazardous waste or hazardous waste pending analysis.	Citation: 40 CFR 262.17(a)(5)(i)	Section: 2
AOC #3 – Hazardous waste and wastes pending analysis were not managed in the CAA, so it is uncertain if inspection requirements and emergency preparedness requirements were met for these wastes.	Citation: 40 CFR 262.17(a)(1)(v) and 40 CFR 262.252	Section: 2
AOC #4: There were signs of personnel smoking cigarettes as potential sources of ignition near where ignitable hazardous waste is accumulated and handled.	Citation: 40 CFR 262.17(a)(1)(vi)(B)	Section: 2

SECTION V – FOLLOW UP

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. 4/30/2024 email – Ernest Richoux provided the requested documentation as attachments, photographs of corrective actions taken, and written responses to areas of concern and follow-up questions from EPA.
2. 5/6/2024 email – Ernest Richoux provided analytical data from sampling and an associated safety data sheet for an unmarked drum that was on site at the time of the inspection.

SECTION VI – LIST OF APPENDICES

Appendix 1. Photograph Log

Appendix 2. PMI Response on 04/30/24

Appendix 3. Spent Blasting Media Analysis

Appendix 4. LDEQ Transfer Facility Status Approval

Appendix 5. Photos of Corrective Actions

APPENDIX 1.
PHOTOGRAPH LOG



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 1

Location: PMI Environmental Services		
City: Golden Meadow	County/Parish: Lafourche	State: Louisiana



Photo File Name: DSCN0940

Date of Photo: 04/15/2024

Time of Photo: 11:20 hrs.

Photographer: George Wieber

Description: View of frac tanks staged for future use in non-E&P vessel tank cleaning.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 2

Location: PMI Environmental Services		
City: Golden Meadow	County/Parish: Lafourche	State: Louisiana



Photo File Name: DSCN0941

Date of Photo: 04/15/2024

Time of Photo: 11:20 hrs.

Photographer: George Wieber

Description: View of a label on one of the frac tanks staged for future use in non-E&P vessel tank cleaning.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 3

Location: PMI Environmental Services		
City: Golden Meadow	County/Parish: Lafourche	State: Louisiana



Photo File Name: DSCN0942

Date of Photo: 04/15/2024

Time of Photo: 11:21 hrs.

Photographer: George Wieber

Description: View of frac tanks staged for future use in non-E&P vessel tank cleaning.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Photograph Log

Photo No. 4

Location: PMI Environmental Services		
City: Golden Meadow	County/Parish: Lafourche	State: Louisiana



Photo File Name: DSCN0943

Date of Photo: 04/15/2024

Time of Photo: 11:29 hrs.

Photographer: George Wieber

Description: View of the painting and cleaning area for frac tanks.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 5

Location: PMI Environmental Services		
City: Golden Meadow	County/Parish: Lafourche	State: Louisiana



Photo File Name: DSCN0944

Date of Photo: 04/15/2024

Time of Photo: 11:29 hrs.

Photographer: George Wieber

Description: Rips observed in the liner system for the painting and cleaning area for frac tanks. The ground beneath the liner was exposed in several areas.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 6

Location: PMI Environmental Services		
City: Golden Meadow	County/Parish: Lafourche	State: Louisiana



Photo File Name: DSCN0945

Date of Photo: 04/15/2024

Time of Photo: 11:30 hrs.

Photographer: George Wieber

Description: Overview of the painting and cleaning area for frac tanks.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 7

Location: PMI Environmental Services		
City: Golden Meadow	County/Parish: Lafourche	State: Louisiana



Photo File Name: DSCN0946

Date of Photo: 04/15/2024

Time of Photo: 11:46 hrs.

Photographer: George Wieber

Description: View of a faded label on a drum of washwater pending waste analysis in a staging area.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 8

Location: PMI Environmental Services		
City: Golden Meadow	County/Parish: Lafourche	State: Louisiana



Photo File Name: DSCN0947

Date of Photo: 04/15/2024

Time of Photo: 11:46 hrs.

Photographer: George Wieber

Description: View of a drum of washwater with a faded label pending waste analysis in the staging area (same drum as in Photo No. 7).



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Photograph Log

Photo No. 9

Location: PMI Environmental Services		
City: Golden Meadow	County/Parish: Lafourche	State: Louisiana

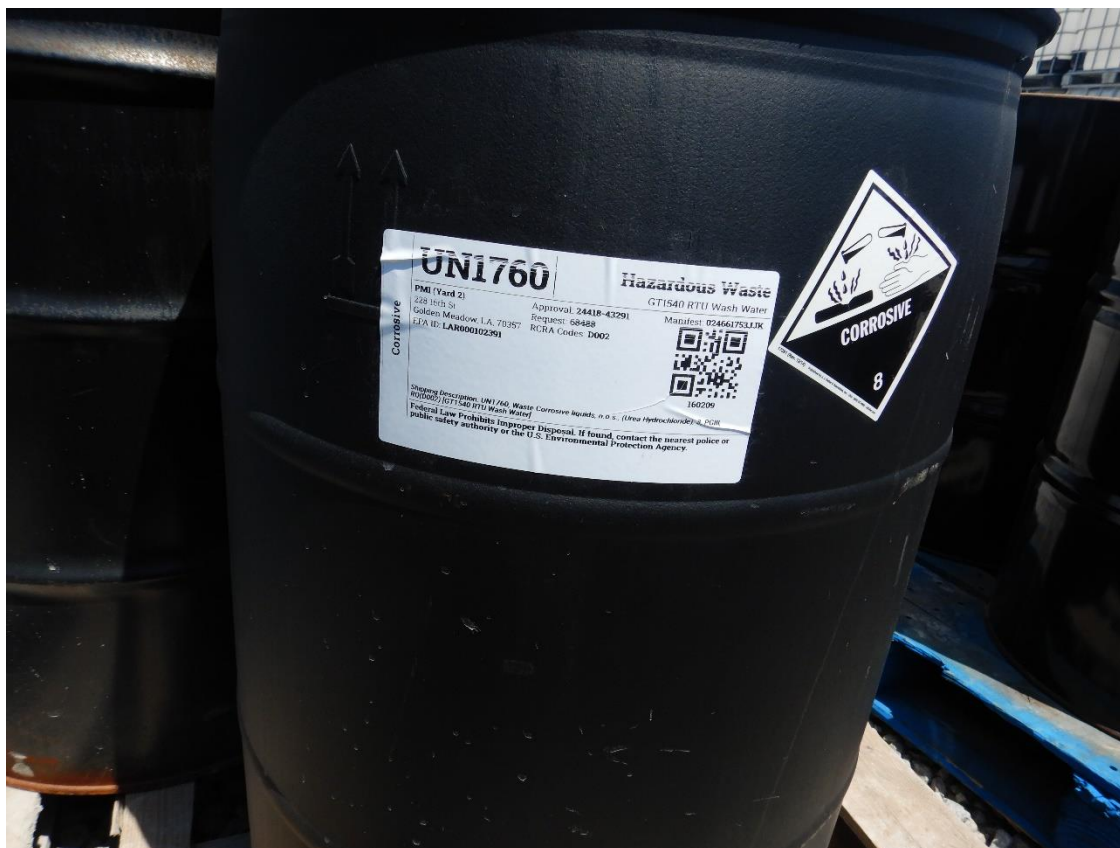


Photo File Name: DSCN0948

Date of Photo: 04/15/2024

Time of Photo: 11:51 hrs.

Photographer: George Wieber

Description: View of a BEOM hazardous waste label on a 55-gallon drum of washwater. The same drum had a non-hazardous waste label (see Photo No. 10).



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 10

Location: PMI Environmental Services		
City: Golden Meadow	County/Parish: Lafourche	State: Louisiana

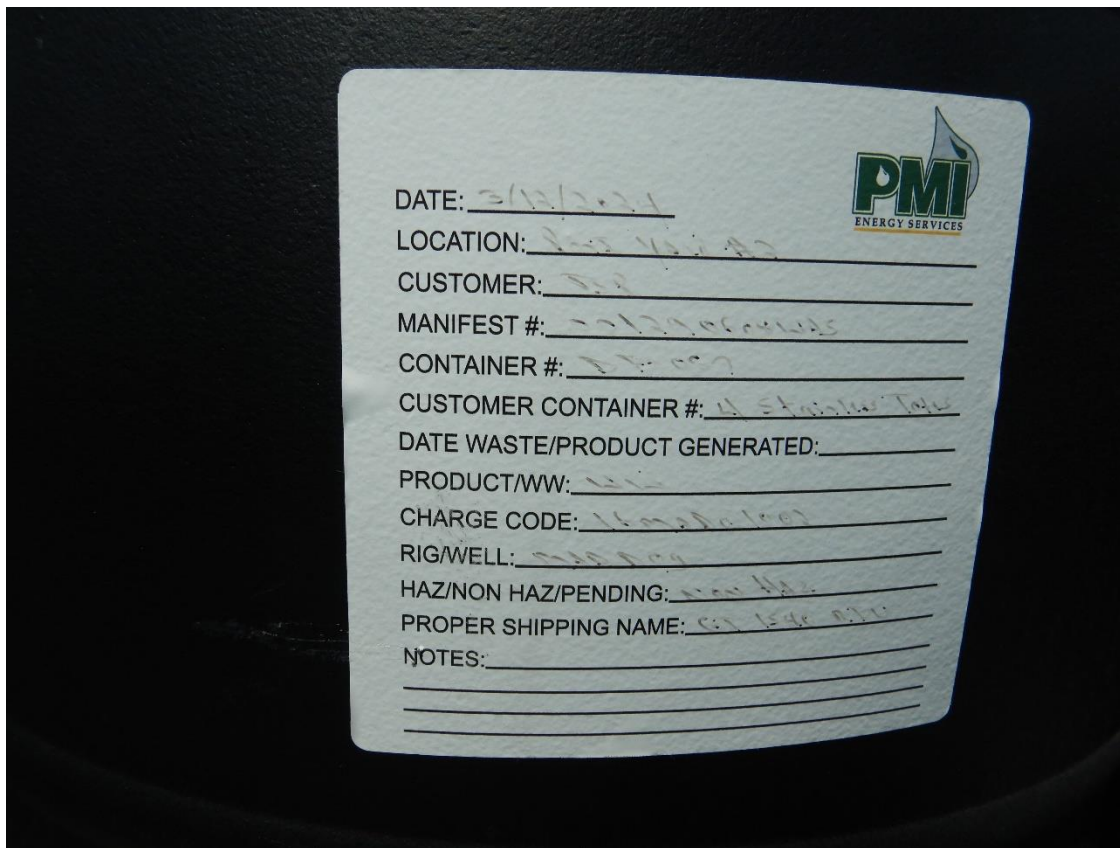


Photo File Name: DSCN0949

Date of Photo: 04/15/2024

Time of Photo: 11:51 hrs.

Photographer: George Wieber

Description: View of a PMI nonhazardous waste label on a 55-gallon drum of washwater. The same drum had a hazardous waste label (see Photo No. 9).



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 11

Location: PMI Environmental Services		
City: Golden Meadow	County/Parish: Lafourche	State: Louisiana



Photo File Name: DSCN0950

Date of Photo: 04/15/2024

Time of Photo: 11:51 hrs.

Photographer: George Wieber

Description: View of a 55-gallon drum with both a PMI nonhazardous waste label and a BEOM hazardous waste label (see Photo Nos. 9 and 10).



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 12

Location: PMI Environmental Services		
City: Golden Meadow	County/Parish: Lafourche	State: Louisiana



Photo File Name: DSCN0951

Date of Photo: 04/15/2024

Time of Photo: 11:53 hrs.

Photographer: George Wieber

Description: View of a PMI label on a 55-gallon drum identifying it as hazardous waste washwater.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 13

Location: PMI Environmental Services

City: Golden Meadow

County/Parish: Lafourche

State: Louisiana



Photo File Name: DSCN0952

Date of Photo: 04/15/2024

Time of Photo: 11:53 hrs.

Photographer: George Wieber

Description: View of a 55-gallon drum of washwater with a PMI label identifying it as hazardous waste.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 14

Location: PMI Environmental Services		
City: Golden Meadow	County/Parish: Lafourche	State: Louisiana

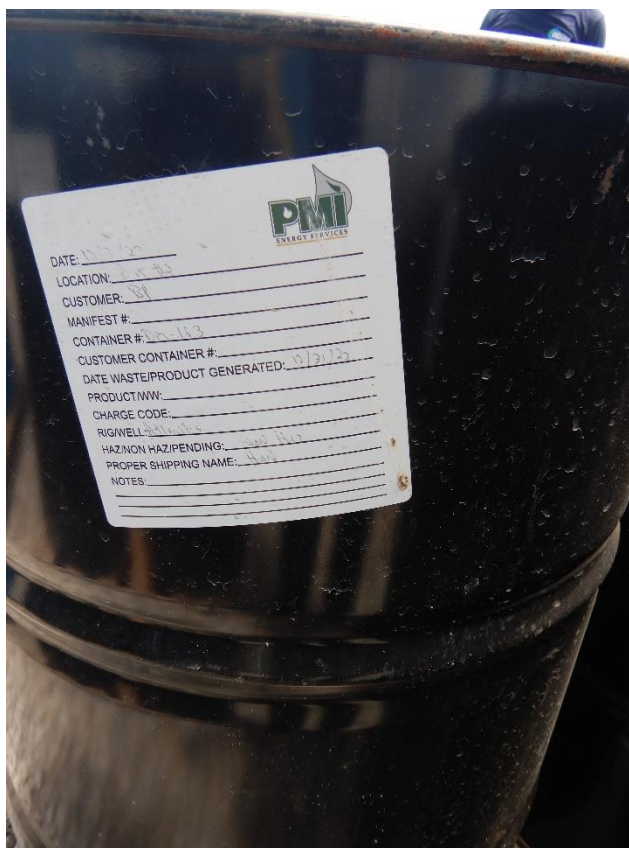


Photo File Name: DSCN0955

Date of Photo: 04/15/2024

Time of Photo: 12:14 hrs.

Photographer: George Wieber

Description: View of a PMI nonhazardous waste label showing a generation date in December 2023. The PMI label is used as a temporary label until analysis confirms the waste determination.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 15

Location: PMI Environmental Services		
City: Golden Meadow	County/Parish: Lafourche	State: Louisiana



Photo File Name: DSCN0956

Date of Photo: 04/15/2024

Time of Photo: 12:14 hrs.

Photographer: George Wieber

Description: View of a 55-gallon drum with a PMI nonhazardous waste label showing a generation date in December 2023. The PMI label is used as a temporary label until analysis confirms the waste determination.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 16

Location: PMI Environmental Services		
City: Golden Meadow	County/Parish: Lafourche	State: Louisiana



Photo File Name: DSCN0957

Date of Photo: 04/15/2024

Time of Photo: 12:17 hrs.

Photographer: George Wieber

Description: View of an unlabeled 55-gallon drum in the staging area.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Photograph Log

Photo No. 17

Location: PMI Environmental Services		
City: Golden Meadow	County/Parish: Lafourche	State: Louisiana



Photo File Name: DSCN0958

Date of Photo: 04/15/2024

Time of Photo: 12:21 hrs.

Photographer: George Wieber

Description: Overview of the staging area for products and nonhazardous wastewater.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 18

Location: PMI Environmental Services		
City: Golden Meadow	County/Parish: Lafourche	State: Louisiana



Photo File Name: DSCN0962

Date of Photo: 04/15/2024

Time of Photo: 12:24 hrs.

Photographer: George Wieber

Description: Overview of the staging area for products and nonhazardous wastewater.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 19

Location: PMI Environmental Services		
City: Golden Meadow	County/Parish: Lafourche	State: Louisiana



Photo File Name: DSCN0963

Date of Photo: 04/15/2024

Time of Photo: 12:26 hrs.

Photographer: George Wieber

Description: View of a cigarette butt located on the ground near the hazardous waste accumulation area on site.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 20

Location: PMI Environmental Services		
City: Golden Meadow	County/Parish: Lafourche	State: Louisiana



Photo File Name: DSCN0965

Date of Photo: 04/15/2024

Time of Photo: 12:27 hrs.

Photographer: George Wieber

Description: View of a cigarette butt located on the ground near the hazardous waste accumulation area on site.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 21

Location: PMI Environmental Services		
City: Golden Meadow	County/Parish: Lafourche	State: Louisiana



Photo File Name: DSCN0966

Date of Photo: 04/15/2024

Time of Photo: 12:27 hrs.

Photographer: George Wieber

Description: View of a cigarette butt located on the ground near the hazardous waste accumulation area on site.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 22

Location: PMI Environmental Services		
City: Golden Meadow	County/Parish: Lafourche	State: Louisiana



Photo File Name: DSCN0968

Date of Photo: 04/15/2024

Time of Photo: 12:29 hrs.

Photographer: George Wieber

Description: View of a cigarette butt located on the ground near the hazardous waste accumulation area on site.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 23

Location: PMI Environmental Services		
City: Golden Meadow	County/Parish: Lafourche	State: Louisiana



Photo File Name: DSCN0969

Date of Photo: 04/15/2024

Time of Photo: 12:30 hrs.

Photographer: George Wieber

Description: View of a cigarette butt located on the ground near the hazardous waste accumulation area on site.

APPENDIX 2.
PMI RESPONSE ON 04/30/24

APPENDIX 3. SPENT BLASTING MEDIA ANALYSIS

APPENDIX 4. LDEQ TRANSFER FACILITY STATUS APPROVAL

APPENDIX 5. PHOTOS OF CORRECTIVE ACTIONS