

INSPECTION REPORT

Inspection Entry Date/Time	6/6/2024 2:10 PM (CT)	Announced: No		
Inspection Exit Date/Time	6/6/2024 3:30 PM (CT)	Access: Granted		
Regulatory Program	RCRA			
Type of Inspection	Focused Compliance Inspection (FCI)			
Facility or Site Name	C-Port, LLC			
Facility/Site Identifier	LAR000051672			
Facility/Site Physical Address	106 9th St			
City, State, Zip Code	Golden Meadow, LA 70357			
County/Borough	Lafourche Parish			
Generator Status	Very Small Quantity Generator (VSQG)			
NAICS	213112			
Type of Operation	C-Port, LLC operates a cargo terminal at Port Fourchon			
Geographic Coordinates	29.129525, -90.215618			
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
Neil Rapp	Contractor	Eastern Research Group (ERG)	Neil.Rapp@erg.com	(480) 450-6517
Lead Inspector:				
Vince Damiano				
	ERG		Vince.Damiano@erg.com	(703) 835-6281

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

Type of inspection: Focused Compliance Inspection (FCI)

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 maintaining 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 verbal or written statements made during or after the on-site inspection, and 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	Vince Damiano	(703) 835-6281	Vince.Damiano@erg.com	Yes	Yes
RCRA Inspector/ Contractor/ERG	Neil Rapp	(480) 450-6517	Neil.Rapp@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	Areas of Concern
C-Port, LLC	06/06/24	C-Port, LLC (CP) operates nine slips and has six tenants that it services. CP loads and offloads vessels for tenants and does not allow third parties to use its dock space. It also conducts bulk fluid transfers providing diesel to vessels at the terminal. CP offloads waste from vessels at its slips, but the clients at the terminal manage the waste after offloading. CP does not store or manage any of the waste removed from vessels. CP does unload MARPOL waste (USDA-regulated [APHIS] waste) from vessels, which it directly loads into dumpsters. The dumpsters are managed by its tenants and their ship agents. CP is a VSQG of hazardous waste and maintains a MARPOL COA for Annexes I and V.	Yes

SECTION II – OBSERVATIONS

Tenant: C-Port, LLC			
Section: 2.1	Date: 6/6/2024, 2:10 P.M.	Contains AOC: Yes	Contains CBI: No
Lead Inspector: Vince Damiano		Attendees: James Guidry (General Manager), Matt Labat (QHSE Manager), Brittney Serigney (Environmental Supervisor)	
CP personnel provided the inspection team with a summary of operations at the facility. CP operates a cargo terminal with nine slips and has six tenants (Halliburton, MI Swaco, Baker Houghes, Champion X, Cantium, and Occidental/Anadarko) that it services. CP loads and offloads supplies and equipment from vessels and trucks for its tenants. In addition, CP conducts bulk fluid transfers providing diesel to tenants' and third-party vessels at the terminal. CP also offloads waste including hazardous waste from tenants' vessels at its slips, but the tenants manage the waste at the terminal after offloading. The company does not store or manage any of the waste removed from vessels. CP unloads APHIS waste from vessels as well, which it places directly into dumpsters for its tenants. The dumpsters are managed by its tenants and their ship agents. CP maintains a MARPOL COA for Annexes I and V. CP is registered with EPA as a transfer facility for used oil (LAR000051672). However, Mr. Guidry stated that CP does not act as a used oil transfer facility and that CP registered with EPA in anticipation of potential future operations. The facility is a VSQG of hazardous waste, mostly generated from day-to-day maintenance operations at the terminal (i.e., paint waste). CP also generates used oil from equipment maintenance which it disposes of with American Recovery. After the opening conference, the inspection team conducted a visual inspection of the facility's dock space and warehouse. No areas of concern (AOCs) were identified during the initial visual inspection; however, further EPA review may change or add to their potential AOCs. A closing conference was conducted at approximately 3:20 PM with CP personnel. The inspection team requested a copy of the CP's MARPOL COA. At the time of writing this report, the inspection team had not received the requested documentation from CP. After concluding its inspection of CP, the inspection team conducted a separate inspection of Anadarko Petroleum Company, a wholly owned subsidiary of Occidental (Anadarko). Anadarko is a tenant of CP and rents dock space from it including Slip 6. While inspecting Slip 6 with Anadarko personnel, the inspection team observed spilled material and stains on the concrete and gravel near the edge of the slip and behind a small building referred to as the fuel shack. Anadarko personnel indicated that the spills and stains were related to CP's fueling activities at the slip. The inspection team identified two spills at Slip 6. One along the edge of the slip which was approximately 50 ft x 3 ft in size, and a second which was about 4 ft in diameter (see Appendix 1 – Photos 1 to 5). [AOC #1 – CP did not make a hazardous waste determination for the spilled material at Slip 6. - 40 CFR 262.11]. The inspection team contacted CP in a follow-up email and requested a hazardous waste determination for the spill material. Mr. Labat provided a response on 6/13/2024, which has been included in this report as Appendix 2.			

SECTION III – RECORDS REVIEW

No RCRA regulated records were reviewed during this focused onsite inspection besides those mentioned in Section II.

SECTION IV – AREA OF CONCERN

The presentation of AOCs does not constitute a formal compliance determination or violation.

Tenant: C-Port, LLC		
AOC #1 – CP did not make a hazardous waste determination for the spilled material at Slip 6.	Citation: 40 CFR 262.11	Section: 2.1

SECTION V –FOLLOW UP

Documents or files provided by the facility were transmitted via email.

Communication Log

After the inspection, additional information was emailed to EPA including:

1. 6/13/2024 CP email – Matt Labat provided a response to the AOC identified during the inspection.

SECTION VI – LIST OF APPENDICES

Appendix 1 - Photograph Log

Appendix 2 C-Port Response to AOC



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Appendix 1 Photograph Log



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 1

Location: C-Port, LLC		
City: Golden Meadow	County/Parish: Lafourche	State: Louisiana



Photo File Name: DSCN7337

Date of Photo: 6/06/2024

Time of Photo: 16:36 CST

Photographer: Vince Damiano

Description: View of spilled material along the edge of Slip 6.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 2

Location: C-Port, LLC		
City: Golden Meadow	County/Parish: Lafourche	State: Louisiana



Photo File Name: DSCN7338

Date of Photo: 6/06/2024

Time of Photo: 16:36 CST

Photographer: Vince Damiano

Description: View of spilled material along the edge of Slip 6.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Photograph Log

Photo No. 3

Location: C-Port, LLC		
City: Golden Meadow	County/Parish: Lafourche	State: Louisiana



Photo File Name: DSCN7339

Date of Photo: 6/06/2024

Time of Photo: 16:36 CST

Photographer: Vince Damiano

Description: View of spilled material along the edge of Slip 6.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 4

Location: C-Port, LLC		
City: Golden Meadow	County/Parish: Lafourche	State: Louisiana



Photo File Name: DSCN7340

Date of Photo: 6/06/2024

Time of Photo: 16:36 CST

Photographer: Vince Damiano

Description: View of spilled material by fuel shack at Slip 6.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 5

Location: C-Port, LLC		
City: Golden Meadow	County/Parish: Lafourche	State: Louisiana



Photo File Name: DSCN7341

Date of Photo: 6/06/2024

Time of Photo: 16:36 CST

Photographer: Vince Damiano

Description: View of spilled material by fuel shack at Slip 6.

Appendix 2
C-Port Response to AOC

C-Port 1
Audit date: 06/07/2024

Audit report
Environmental Inspection

Cajun Iron Workers
Closed
CP1/2024/001

Planned date	Audit location	Company	Auditor
06/07/2024	C-Port 1	EPA	Vince Damiano
Assisting auditor	Audit author	Auditor's ref. no.	
Matt Labat, Brittney Serigny, James Guidry	Matt Labat/ECO		
Comments			
EPA conducted a RCRA compliance inspection at C-Port 1.			

Findings					
#	Finding Type	Title	Responsible	Limit date	Status
001	Non-Conformity	Stained Pavers	Matt Labat/ECO	06/21/2024	Closed
002	Non-Conformity	Stained Limestone	Matt Labat/ECO	06/21/2024	Closed

References		
Type	Title	Number
Attachment	C PORT EPA SIGN IN.pdf	N/A

Inspection Site: EPA R6 Port Fourchon

Inspection Site: EPA R6 Port Fourchon

Date: 04/04/2024

Please write legibly:

Brittina Serigny @ chouest.
 matt.65@chouest.com com
 james.guckey@chouest.com

Responsible
Matt Labat/ECO

Due Date
06/21/2024

Title
Stained Pavers

Description
Stained pavers located in slip 6

Auditor's Comments
Stained pavers indicate a potential release of product

Rules & Regulations

Analysis

Type of contact or near contact with energy or substance

Immediate Causes

Basic/Underlying Causes

Analysis Comments

Analysis of risk potential

HAZARD SEVERITY OUTCOME				PROBABILITY				
[A] People	[B] Assets	[C] Environmental	[D] Reputation	Never heard of in the marine industry	Heard of in the marine industry last 10 years	Incident has occurred in the company last 10 years	Happens several times per year at the company	Happens several times per year on a location or vessel
Slight Injury FA/Personal Impact	Slight damage \$1 - \$1,000	Slight impact less than 20 gallons	Slight Impact	A1	B1	✓ C1	D1	E1
Minor Injury FA/Limited Personal Impact	Minor damage more than \$1,000	Minor impact between 20 gallons and 1 barrel	Limited Impact	A2	B2	C2	D2	E2
LTA/REC/ Considerable Personal Impact	Localized damage more than \$10,000	Localized impact between 1 barrel and 5 barrels	Considerable Impact	A3	B3	C3	D3	E3
Single Fatality/Major Personal Impact	Major damage more than \$100,000	Major impact between 5 barrels and 100 barrels	National Impact	A4	B4	C4	D4	E4
Multiple Fatalities/Catastrophic Personal Impact	Extensive damage more than \$1,000,000	Massive impact more than 100 barrels	International Impact	A5	B5	C5	D5	E5
				A	B	C	D	E

Workflow

Responsible

Planned Corrective Action

Pavers were pressure washed

Corrective Actions Taken

Pavers were pressure washed

Actions to Prevent Reoccurrence

Nothing at this time

Resp. sign.

Matt Labat, 06/13/2024

Auditor closing

Auditor Follow-Up/Effectiveness of Corrective Action(s)

Pavers were pressure washed and any recovered product was placed in a DOT drum. A forklift operator had knocked over a drum containing used oil filters and pads. The area was cleaned appropriately.

Signature

Matt Labat, 06/13/2024

References

Type	Title	Number
Attachment	Photo Page.pdf	N/A



QHSE Dept.
Forms
Miscellaneous
Photo Page

Cajun Iron Workers

Approved

QHSE/F/MI/1660

Owner	QHSE Manager	Revision	1
Approved By	Matt Labat	Last Revision Date	9/12/19



Date:	06/13/24	Photographer:	Matt Labat
Description:	Stained pavers		



Date:	06/13/24	Photographer:	Matt Labat
Description:	Stained pavers		

Responsible
Matt Labat/ECO

Due Date
06/21/2024

Title
Stained Limestone

Description
Stained limestone was observed throughout the facility

Auditor's Comments
Stained limestone indicates a potential release of product

Rules & Regulations

Analysis

Type of contact or near contact with energy or substance

Immediate Causes

Basic/Underlying Causes

Analysis Comments

Analysis of risk potential

HAZARD SEVERITY OUTCOME				PROBABILITY					
[A] People	[B] Assets	[C] Environmental	[D] Reputation	Never heard of in the marine industry	Heard of in the marine industry last 10 years	Incident has occurred in the company last 10 years	Happens several times per year at the company	Happens several times per year on a location or vessel	
Slight Injury FA/Personal Impact	Slight damage \$1 - \$1,000	Slight impact less than 20 gallons	Slight Impact	A1	✓ B1	C1	D1	E1	1
Minor Injury FA/Limited Personal Impact	Minor damage more than \$1,000	Minor impact between 20 gallons and 1 barrel	Limited Impact	A2	B2	C2	D2	E2	2
LTA/REC / Considerable Personal Impact	Localized damage more than \$10,000	Localized impact between 1 barrel and and 5 barrels	Considerable Impact	A3	B3	C3	D3	E3	3
Single Fatality/Major Personal Impact	Major damage more than \$100,000	Major impact between 5 barrels and 100 barrels	National Impact	A4	B4	C4	D4	E4	4
Multiple Fatalities/Catastrophic Personal Impact	Extensive damage more than \$1,000,000	Massive impact more than 100 barrels	International Impact	A5	B5	C5	D5	E5	5
				A	B	C	D	E	

Workflow

Responsible

Planned Corrective Action

Recover limestone if needed

Corrective Actions Taken

Areas were flushed with water to determine if there was a released product causing the staining the the lime stone. There was no evidence of active spills or sheen from the limestone when areas were flushed with water. No further action taken.

Actions to Prevent Reoccurrence

Auditor closing

Auditor Follow-Up/Effectiveness of Corrective Action(s)

Areas were flushed with water to determine if there was a released product causing the staining the the lime stone. There was no evidence of active spills or sheen from the limestone when areas were flushed with water. No further action taken.

Signature

Matt Labat, 06/13/2024

References

No references