

INSPECTION REPORT

Inspection Entry Date/Time	07/16/2024 13:51 (CT)		Announced: No (tenants and related facilities)	
Inspection Exit Date/Time	07/16/2024 14:33 (CT)		Access: Granted	
Regulatory Program	RCRA			
Type of Inspection	Focused Compliance Inspection (FCI)			
Facility or Site Name	QSL New Orleans LLC			
Facility/Site Identifier	N/A			
Facility/Site Physical Address	First Street Wharf			
City, State, Zip Code	New Orleans, LA 70115			
County/Borough	Orleans Parish			
Generator Status	N/A			
NAICS	488320			
Type of Operation	QSL operates as a stevedoring company loading and unloading cargo from vessels.			
Geographic Coordinates	29.92203, -90.0734			
Additional Persons Participating in Inspection:				
Name	Title	Organization	Email	Phone
Dedriel Gardner	Inspector	EPA REGION 6	Gardner.Dedriel@epa.gov	(281) 983-2133
Joe Watson	Contractor	Eastern Research Group (ERG)	Joe.Watson@erg.com	(215) 891-6615
Lead Inspector:				
Vince Damiano				
	ERG	Vince.Damiano@erg.com	(703) 835-6281	

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

The Port of New Orleans 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, 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	Vince Damiano	(703) 835-6281	Vince.Damiano@erg.com	Yes	Yes
RCRA Inspector/ Contractor/ERG	Joe Watson	(215) 891-6615	Joe.Watson@erg.com	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
QSL New Orleans LLC	07/16/24	QSL New Orleans LLC (QSL) operates as a stevedoring company loading and unloading cargo from vessels. The cargo QSL handles mainly consists of metals, bulk materials, and project cargo crates. QSL maintains a MARPOL COA through the Port of New Orleans.	Yes

SECTION II – OBSERVATIONS

Tenant: QSL New Orleans LLC			
Section: 2.1	Date: 07/16/24, 01:51 PM	Contains AOC: Yes	Contains CBI: No
Lead Inspector: Vince Damiano	Attendees: Tony Dow (Manager)		
QSL is located within Port of New Orleans and operates as a stevedoring company loading and unloading cargo from vessels. The cargo QSL handles mainly consists of metals, bulk materials, and project cargo crates. Mr. Dow stated most of their cargo loads are from ships directly onto barges and the cargo is never stored at QSL's warehouse. The cargo that is unloaded off ships, is stored before being shipped off to customers in trucks or rail cars. QSL maintains a MARPOL COA through the Port of New Orleans. Mr. Dow stated they do not remove any waste from ships but will occasionally accept dunnage which is placed in a roll off container for recycling. Mr. Dow stated that third party boats will remove waste from ships docked at QSL, but QSL is not involved in this process and the waste never comes onto QSL property. QSL is not registered with the EPA as a hazardous waste generator. Following the opening conference, the inspection team conducted a visual inspection of QSL's warehouse where their maintenance area is located and their dock area. Inside the maintenance area, the inspection team observed an approximate half-full 275-gal tote used to collect used oil from maintenance activities that did not contain a label with the words "Used Oil" (see Appendix 1 - Photos 1 and 2) [AOC #1: <i>QSL did not clearly label containers used to store used oil with the words "Used Oil."</i> – 40 CFR 279.22 (c)(1)]. Next, the inspection team observed the dock space from a distance because a ship was currently being loaded with toxic lead. Due to an emergency that occurred regarding the shipment, the facility representative had to wrap the inspection up quickly since Mr. Dow was the only representative available to meet with the inspection team. The inspection team did not observe other areas of concern (AOCs) at the time of the inspection; however, further EPA review may change or add to these potential AOCs. A closing conference was conducted at approximately 02:30 PM with QSL personnel. The AOCs were communicated during the closing. Following the inspection, the inspection team inquired about any hazardous waste that may be produced from the handling of the toxic lead material observed during the inspection. Mr. Dow responded on 7/16 stating; <i>"As for the vessel loading lead, all Tyvek suits worn by our employees are placed in drums, locked down, a placard placed on drums and they are shipped by truck back to the customer to incinerate at the mine. The shower water is placed in the last barge to complete and a third party vacuums the water up at their facility and sends it back to the customer facility"</i> (see Appendix 2). Based on the response provided by QSL, it appears a hazardous waste determination would be needed regarding the lead contaminated PPE and shower water [AOC #2 – <i>QSL did not make a hazardous waste determination.</i> - 40 CFR 262.11]. On 7/18, Mr. Dow provided the inspection team with a photograph of the used oil tote properly labeled (see Appendix 3).			

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: QSL New Orleans LLC		
AOC #1 – QSL did not clearly label containers used to store used oil with the words “Used Oil.”	Citation: 40 CFR 279.22 (c)(1)	Section: 2.1
AOC #2 – QSL did not make a hazardous waste determination.	Citation: 40 CFR 262.11	Section: 2.1

SECTION V – FOLLOW UP**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. 07/16/24 QSL email – Mr. Dow sent a follow-up addressing concerns related to the handling of the toxic lead material observed during the inspection.
2. 07/18/24 QSL email – Mr. Dow sent a follow-up photograph of the used oil tote properly labeled.

SECTION VI – LIST OF APPENDICES

Appendix 1. Photograph Log

Appendix 2. QSL 07/16/24 Response

Appendix 3. QSL 07/18/24 Response Photograph

APPENDIX 1.
PHOTOGRAPH LOG



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 1

Location: QSL New Orleans LLC		
City: New Orleans	County/Parish: Orleans	State: Louisiana



Photo File Name: DSCN6707

Date of Photo: 07/16/2024

Time of Photo: 14:14 hrs.

Photographer: Vince Damiano

Description: One 275-gallon tote containing used oil that was not labeled found in maintenance area.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 2

Location: QSL New Orleans LLC		
City: New Orleans	County/Parish: Orleans	State: Louisiana



Photo File Name: DSCN6708

Date of Photo: 07/16/2024

Time of Photo: 14:15 hrs.

Photographer: Vince Damiano

Description: Another view of one 275-gal tote containing used oil that was not labeled found in maintenance area.

APPENDIX 2.
QSL 07/16/24 RESPONSE

Re: Follow-up from EPA Visit on 7/17

Tony Dow <tony.dow@qsl.com>

Tue 7/16/2024 7:11 PM

To: Vince Damiano <Vince.Damiano@erg.com>; Randy Dow <randy.dow@qsl.com>

Cc: Joe Watson <Joe.Watson@erg.com>; Gardner, Dedriel <Gardner.Dedriel@epa.gov>

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

Vince

Nice meeting you today. Sorry I was busy and running with multiple items. Please note the maintenance manager has ordered two signs for used oil. Once received and placed, we will send a photo to you. As for the vessel loading lead, all Tyvek suits worn by our employees are placed in drums, locked down, a placard placed on drums and they are shipped by truck back to the customer to incinerate at the mine. The shower water is placed in the last barge to complete and a third party vacuums the water up at their facility and sends it back to the customer facility.

Regards

Tony

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

Sent: Tuesday, July 16, 2024 6:02 PM

To: Tony Dow <tony.dow@qsl.com>; Randy Dow <randy.dow@qsl.com>

Cc: Joe Watson <Joe.Watson@erg.com>; Gardner, Dedriel <Gardner.Dedriel@epa.gov>

Subject: Follow-up from EPA Visit on 7/17

MISE EN GARDE: Ce courriel provient d'une source externe. Avant d'accéder à une pièce jointe ou à un lien de ce courriel, assurez-vous d'en connaître l'expéditeur et que le contenu soit de confiance.

WARNING: This is an external e-mail. Before opening an attachment or clicking on a link, please make sure you recognize the sender and that the content is safe.

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:

- Please confirm your RCRA EPA ID Number and generator status, if you have one.
- Today we noticed a ship being loaded with lead, we wanted to confirm if there is any hazardous lead contaminated waste being generated from this process. If so, please provide information on the waste streams.

Initial Areas of Concern. You may follow-up with pictures, write-ups, sample results, or however you see fit.

- Unlabeled used oil tote.

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: (570) 956-1468

Vince.Damiano@erg.com

APPENDIX 3.
QSL 07/18/24 RESPONSE PHOTOGRAPH



On 7/18/2024, QSL provided this photo of the used oil tote properly labeled.