

INSPECTION REPORT

Inspection Entry Date/Time	03/11/2024 14:08 (CT)			Announced: No
Inspection Exit Date/Time	03/11/2024 16:30 (CT)			Access: Granted
Regulatory Program	RCRA			
Type of Inspection	Focused Compliance Inspection (FCI)			
Facility or Site Name	Buckeye Texas Hub LLC			
Facility/Site Identifier	TXR000086148			
Facility/Site Physical Address	7002 Marvin L Berry Road			
City, State, Zip Code	Corpus Christi, TX 78409			
County/Borough	Nueces County			
Generator Status	N/A			
NAICS	424710			
Type of Operation	Buckeye Texas Hub LLC operates as a terminal and storage facility for crude oil and naphtha			
Geographic Coordinates	27.827935, -97.49953			
Additional Persons Participating in Inspection:				
Name	Title	Organization	Email	Phone
Joyce Johnson	Inspector	EPA REGION 6	Johnson.Joyce@epa.gov	(214) 665-8548
Erin Young-Dahl	Inspector	EPA REGION 6	YoungDahl.Erin@epa.gov	(214) 665-3166
Andrew Gates	Contractor	Eastern Research Group (ERG)	Andrew.Gates@erg.com	(657) 206-7829
Lead Inspector:				
Vince Damiano				07/11/2024
	ERG	Vince.Damiano@erg.com	(703) 633-1732	

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

The Port of Corpus Christi 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	Vince Damiano	(703) 633-1732	Vince.Damiano@erg.com	Yes	Yes
RCRA Inspector/ Contractor/ERG	Andrew Gates	(657) 206-7829	Andrew.Gates@erg.com	Yes	Yes
Inspector/Enforcement Officer/EPA Region 6	Joyce Johnson	(214) 665-8548	Johnson.Joyce@epa.gov	Yes	Yes
Inspector/Enforcement Officer/EPA Region 6	Erin Young-Dahl	(214) 665-3166	YoungDahl.Erin@epa.gov	Yes	Yes

Facility General Description

Tenant/Area	Inspection Date	Process Description	Area of Concern
Buckeye Texas Hub LLC	03/11/24	Buckeye Texas Hub LLC (Buckeye) operates as a terminal and storage facility for crude oil and naphtha, which arrive via pipeline and truck rack. Other products, such as kerosene, jet fuel, high sulfur diesel, and atmospheric tower bottoms, are loaded directly onto ships via pipeline and are not stored on site. Marine bunker fuel arrives by vessel, is mixed onsite, and leaves by vessel. The facility operates five private docks. One dock, dock number 2, is shared with Gatefront LLC. The facility maintains a MARPOL COA for Annex I and V but does not receive waste from vessels.	No

SECTION II – OBSERVATIONS

Tenant: Buckeye Texas Hub LLC			
Section: 2.1	Date: 03/11/24, 2:08 PM	Contains AOC: No	Contains CBI: No
Lead Inspector: Vince Damiano	Attendees: Anthony Cummings (Environmental Manager), Steven Hamlin (Operations Manager), David Long (Environmental Specialist)		
Buckeye is located along the Port of Corpus Christi shipping channel and operates as an export terminal for crude oil, naphtha, kerosene, heavy fuel, and liquid petroleum gas (LPG). Buckeye receives crude oil and naphtha by mostly pipeline and stores it in tanks until it is loaded on vessels for transport. Kerosene and other high sulfur products are never stored onsite; these products are loaded directly onto vessels from a pipeline. Heavy fuel is received from ships, blended on site into marine bunker fuel, and loaded back onto vessels for delivery. LPG is received mostly by pipeline. Buckeye operates five private docks and maintains a MARPOL COA for Annex I and V from the USCG. Buckeye personnel stated that they do not accept waste from ships or allow third party companies to remove waste from ships across their docks. Buckeye maintains an EPA ID (TXR000086148) but is not a generator of hazardous waste. During the inspection, the inspection team visually inspected several of Buckeye’s dock spaces and its central accumulation area (CAA). At Dock #1, the inspection team observed a 55-gallon drum of oily debris which was properly labeled and in good condition and a collection sump for rainwater. Buckeye personnel said that the rainwater is pumped out via vacuum truck and sent to Western Gulf Recycling (WGR) to be treated and released. In the CAA, the inspection team observed two full 5-gallon containers of Kuridyne P-123 hydraulic fluid, which appeared to be discarded as wastes but were not labeled (see Appendix 1 – Photos 1 and 2). The inspection team requested a waste determination from Buckeye on the two hydraulic fluid containers. The inspection team did not observe any AOCs at the time of the inspection. A closing conference was conducted at approximately 4:30 PM with Buckeye personnel. Buckeye responded via email on 03/22/2024 that the hydraulic oil was deemed to be non-hazardous and had been taken to WGR for disposal on 03/22/2024. In its email, Buckeye included analytical test results from the containers, an SDS for Kuridyne P-123, and a bill of lading for the disposal of the oil at WGR (see Appendix 2, 3, and 4).			

SECTION III – RECORDS REVIEW

No RCRA-regulated records were reviewed during this focused onsite inspection.

SECTION IV – AREAS OF CONCERN

No areas of concern found during inspection.

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. 03/15/24 Buckeye email – David Long provided follow-up photos of the noted hydraulic oil containers along with an update on the sampling process.
2. 03/22/24 Buckeye email – David Long provided the analytical results of the hydraulic oil, an SDS and a bill of lading.

SECTION VI – LIST OF APPENDICES

Appendix 1. Photograph Log

Appendix 2. Buckeye Analytical Report

Appendix 3. Buckeye Kuridyne P-123 SDS

Appendix 4. BOL Hydraulic Oil to WGR and Full Email

APPENDIX 1.
PHOTOGRAPH LOG



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 1

Location: Buckeye Texas Hub LLC		
City: Corpus Christi	County/Parish: Nueces	State: Texas



Photo File Name: DSCN7079

Date of Photo: 03/11/2024

Time of Photo: 15:10 hrs.

Photographer: Vince Damiano

Description: Two 5-gallon containers of unusable hydraulic fluid found in the CAA.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 2

Location: Buckeye Texas Hub LLC		
City: Corpus Christi	County/Parish: Nueces	State: Texas



Photo File Name: DSCN7080

Date of Photo: 03/11/2024

Time of Photo: 15:10 hrs.

Photographer: Vince Damiano

Description: Two 5-gallon containers of unusable hydraulic fluid found in the CAA.

APPENDIX 2.
BUCKEYE ANALYTICAL REPORT

ANALYTICAL REPORT

PREPARED FOR

Attn: David Long
Buckeye Partners, L.P.
1501 Southern Minerals Road
Corpus Christi, Texas 78409

Generated 3/18/2024 4:52:55 PM

JOB DESCRIPTION

Buckeye-Texas HUB RCI, 3/13/24

JOB NUMBER

560-116813-1

Eurofins Corpus Christi

Job Notes

This report may not be reproduced except in full, and with written approval from the laboratory. The results relate only to the samples tested. For questions please contact the Project Manager at the e-mail address or telephone number listed on this page.

The test results in this report relate only to the samples as received by the laboratory and will meet all requirements of the methodology, with any exceptions noted. This report shall not be reproduced except in full, without the express written approval of the laboratory. All questions should be directed to the Eurofins Environment Testing South Central, LLC Project Manager.

Authorization



Generated
3/18/2024 4:52:55 PM

Authorized for release by
Lance Tigrett, Project Manager II
Lance.Tigrett@et.eurofinsus.com
(979)484-9088

Definitions/Glossary

Client: Buckeye Partners, L.P.
Project/Site: Buckeye-Texas HUB RCI, 3/13/24

Job ID: 560-116813-1

Qualifiers

General Chemistry

Qualifier	Qualifier Description
HF	Parameter with a holding time of 15 minutes. Test performed by laboratory at client's request. Sample was analyzed outside of hold time.
U	Indicates the analyte was analyzed for but not detected.

Glossary

Abbreviation	These commonly used abbreviations may or may not be present in this report.
▫	Listed under the "D" column to designate that the result is reported on a dry weight basis
%R	Percent Recovery
CFL	Contains Free Liquid
CFU	Colony Forming Unit
CNF	Contains No Free Liquid
DER	Duplicate Error Ratio (normalized absolute difference)
Dil Fac	Dilution Factor
DL	Detection Limit (DoD/DOE)
DL, RA, RE, IN	Indicates a Dilution, Re-analysis, Re-extraction, or additional Initial metals/anion analysis of the sample
DLC	Decision Level Concentration (Radiochemistry)
EDL	Estimated Detection Limit (Dioxin)
LOD	Limit of Detection (DoD/DOE)
LOQ	Limit of Quantitation (DoD/DOE)
MCL	EPA recommended "Maximum Contaminant Level"
MDA	Minimum Detectable Activity (Radiochemistry)
MDC	Minimum Detectable Concentration (Radiochemistry)
MDL	Method Detection Limit
ML	Minimum Level (Dioxin)
MPN	Most Probable Number
MQL	Method Quantitation Limit
NC	Not Calculated
ND	Not Detected at the reporting limit (or MDL or EDL if shown)
NEG	Negative / Absent
POS	Positive / Present
PQL	Practical Quantitation Limit
PRES	Presumptive
QC	Quality Control
RER	Relative Error Ratio (Radiochemistry)
RL	Reporting Limit or Requested Limit (Radiochemistry)
RPD	Relative Percent Difference, a measure of the relative difference between two points
TEF	Toxicity Equivalent Factor (Dioxin)
TEQ	Toxicity Equivalent Quotient (Dioxin)
TNTC	Too Numerous To Count

Case Narrative

Client: Buckeye Partners, L.P.
Project: Buckeye-Texas HUB RCI, 3/13/24

Job ID: 560-116813-1

Job ID: 560-116813-1

Eurofins Corpus Christi

Job Narrative 560-116813-1

Analytical test results meet all requirements of the associated regulatory program listed on the Accreditation/Certification Summary Page unless otherwise noted under the individual analysis. Data qualifiers are applied to indicate exceptions. Noncompliant quality control (QC) is further explained in narrative comments.

- Matrix QC may not be reported if insufficient sample or site-specific QC samples were not submitted. In these situations, to demonstrate precision and accuracy at a batch level, a LCS/LCSD may be performed, unless otherwise specified in the method.
- Surrogate and/or isotope dilution analyte recoveries (if applicable) which are outside of the QC window are confirmed unless attributed to a dilution or otherwise noted in the narrative.

Regulated compliance samples (e.g. SDWA, NPDES) must comply with the associated agency requirements/permits.

Receipt

The sample was received on 3/13/2024 3:18 PM. Unless otherwise noted below, the sample arrived in good condition, and, where required, properly preserved and on ice. The temperature of the cooler at receipt time was 31.4°C.

General Chemistry

Method 9040C: This analysis is normally performed in the field and has a method-defined holding time of 15 minutes. The following sample has been qualified with the "HF" flag to indicate analysis was performed in the laboratory outside the 15 minute timeframe: Waste Buckets (560-116813-1).

No additional analytical or quality issues were noted, other than those described above or in the Definitions/ Glossary page.

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Detection Summary

Client: Buckeye Partners, L.P.
Project/Site: Buckeye-Texas HUB RCI, 3/13/24

Job ID: 560-116813-1

Client Sample ID: Waste Buckets

Lab Sample ID: 560-116813-1

Analyte	Result	Qualifier	RL	MDL	Unit	Dil Fac	D	Method	Prep Type
Flashpoint	200		70.0	70.0	Degrees F	1		1010	Total/NA
pH	7.7	HF	0.1	0.1	SU	1		9040C	Total/NA

Client Sample Results

Client: Buckeye Partners, L.P.
Project/Site: Buckeye-Texas HUB RCI, 3/13/24

Job ID: 560-116813-1

Client Sample ID: Waste Buckets

Lab Sample ID: 560-116813-1

Date Collected: 03/13/24 14:35

Matrix: Water

Date Received: 03/13/24 15:18

General Chemistry

Analyte	Result	Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
Flashpoint (SW846 1010)	200		70.0	70.0	Degrees F			03/15/24 15:30	1
Cyanide, Reactive (SW846 9012)	0.0125	U	0.0250	0.0125	mg/L		03/17/24 11:30	03/18/24 13:07	1
Sulfide, Reactive (SW846 9034)	1.25	U	6.25	1.25	mg/L		03/17/24 11:30	03/17/24 15:39	1
pH (SW846 9040C)	7.7	HF	0.1	0.1	SU			03/15/24 13:08	1

QC Sample Results

Client: Buckeye Partners, L.P.
Project/Site: Buckeye-Texas HUB RCI, 3/13/24

Job ID: 560-116813-1

Method: 1010 - Ignitability, Pensky-Martens Closed-Cup Method

Lab Sample ID: LCS 560-213619/1

Matrix: Water

Analysis Batch: 213619

Client Sample ID: Lab Control Sample

Prep Type: Total/NA

Analyte	Spike Added	LCS Result	LCS Qualifier	Unit	D	%Rec	%Rec Limits
Flashpoint	127	125.0		Degrees F		98	88 - 112

Lab Sample ID: 560-116813-1 DU

Matrix: Water

Analysis Batch: 213619

Client Sample ID: Waste Buckets

Prep Type: Total/NA

Analyte	Sample Result	Sample Qualifier	DU Result	DU Qualifier	Unit	D	RPD	RPD Limit
Flashpoint	200		202.0		Degrees F		1	20

Method: 9012 - Cyanide, Reactive

Lab Sample ID: MB 860-150150/1-A

Matrix: Water

Analysis Batch: 150301

Client Sample ID: Method Blank

Prep Type: Total/NA

Prep Batch: 150150

Analyte	MB Result	MB Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
Cyanide, Reactive	0.0125	U	0.0250	0.0125	mg/L		03/17/24 11:30	03/18/24 13:03	1

Lab Sample ID: LCS 860-150150/2-A

Matrix: Water

Analysis Batch: 150301

Client Sample ID: Lab Control Sample

Prep Type: Total/NA

Prep Batch: 150150

Analyte	Spike Added	LCS Result	LCS Qualifier	Unit	D	%Rec	%Rec Limits
Cyanide, Reactive	20.0	3.071		mg/L		15	5 - 40

Lab Sample ID: LCSD 860-150150/3-A

Matrix: Water

Analysis Batch: 150301

Client Sample ID: Lab Control Sample Dup

Prep Type: Total/NA

Prep Batch: 150150

Analyte	Spike Added	LCSD Result	LCSD Qualifier	Unit	D	%Rec	%Rec Limits	RPD	RPD Limit
Cyanide, Reactive	20.0	3.226		mg/L		16	5 - 40	5	20

Lab Sample ID: 560-116813-1 DU

Matrix: Water

Analysis Batch: 150301

Client Sample ID: Waste Buckets

Prep Type: Total/NA

Prep Batch: 150150

Analyte	Sample Result	Sample Qualifier	DU Result	DU Qualifier	Unit	D	RPD	RPD Limit
Cyanide, Reactive	0.0125	U	0.0125	U	mg/L		NC	20

Method: 9034 - Sulfide, Reactive

Lab Sample ID: MB 860-150148/1-A

Matrix: Water

Analysis Batch: 150156

Client Sample ID: Method Blank

Prep Type: Total/NA

Prep Batch: 150148

Analyte	MB Result	MB Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
Sulfide, Reactive	1.25	U	6.25	1.25	mg/L		03/17/24 11:30	03/17/24 15:39	1

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QC Sample Results

Client: Buckeye Partners, L.P.
Project/Site: Buckeye-Texas HUB RCI, 3/13/24

Job ID: 560-116813-1

Method: 9034 - Sulfide, Reactive (Continued)

Lab Sample ID: LCS 860-150148/2-A

Matrix: Water

Analysis Batch: 150156

Client Sample ID: Lab Control Sample

Prep Type: Total/NA

Prep Batch: 150148

Analyte	Spike Added	LCS Result	LCS Qualifier	Unit	D	%Rec	%Rec Limits
Sulfide, Reactive	50.0	48.09		mg/L		96	30 - 120

Lab Sample ID: LCSD 860-150148/3-A

Matrix: Water

Analysis Batch: 150156

Client Sample ID: Lab Control Sample Dup

Prep Type: Total/NA

Prep Batch: 150148

Analyte	Spike Added	LCSD Result	LCSD Qualifier	Unit	D	%Rec	%Rec Limits	RPD	RPD Limit
Sulfide, Reactive	50.0	52.10		mg/L		104	30 - 120	8	20

Lab Sample ID: 560-116813-1 DU

Matrix: Water

Analysis Batch: 150156

Client Sample ID: Waste Buckets

Prep Type: Total/NA

Prep Batch: 150148

Analyte	Sample Result	Sample Qualifier	DU Result	DU Qualifier	Unit	D	RPD	RPD Limit
Sulfide, Reactive	1.25	U	1.25	U	mg/L		NC	20

Method: 9040C - Corrosivity as pH

Lab Sample ID: LCS 560-213613/2

Matrix: Water

Analysis Batch: 213613

Client Sample ID: Lab Control Sample

Prep Type: Total/NA

Analyte	Spike Added	LCS Result	LCS Qualifier	Unit	D	%Rec	%Rec Limits
pH	5.00	5.0		SU		100	98 - 102

Accreditation/Certification Summary

Client: Buckeye Partners, L.P.
Project/Site: Buckeye-Texas HUB RCI, 3/13/24

Job ID: 560-116813-1

Laboratory: Eurofins Corpus Christi

The accreditations/certifications listed below are applicable to this report.

Authority	Program	Identification Number	Expiration Date
Texas	NELAP	T104704210-22-30	03-31-24

Laboratory: Eurofins Houston

Unless otherwise noted, all analytes for this laboratory were covered under each accreditation/certification below.

Authority	Program	Identification Number	Expiration Date
Texas	NELAP	T104704215	06-30-24

The following analytes are included in this report, but the laboratory is not certified by the governing authority. This list may include analytes for which the agency does not offer certification.

Analysis Method	Prep Method	Matrix	Analyte
9012	7.3.3	Water	Cyanide, Reactive
9034	7.3.4	Water	Sulfide, Reactive

Method Summary

Client: Buckeye Partners, L.P.

Job ID: 560-116813-1

Project/Site: Buckeye-Texas HUB RCI, 3/13/24

Method	Method Description	Protocol	Laboratory
1010	Ignitability, Pensky-Martens Closed-Cup Method	SW846	EET CC
9012	Cyanide, Reactive	SW846	EET HOU
9034	Sulfide, Reactive	SW846	EET HOU
9040C	Corrosivity as pH	SW846	EET CC
7.3.3	Cyanide, Reactive	SW846	EET HOU
7.3.4	Sulfide, Reactive	SW846	EET HOU

Protocol References:

SW846 = "Test Methods For Evaluating Solid Waste, Physical/Chemical Methods", Third Edition, November 1986 And Its Updates.

Laboratory References:

EET CC = Eurofins Corpus Christi, 1733 N. Padre Island Drive, Corpus Christi, TX 78408, TEL (361)289-2471

EET HOU = Eurofins Houston, 4145 Greenbriar Dr, Stafford, TX 77477, TEL (281)240-4200

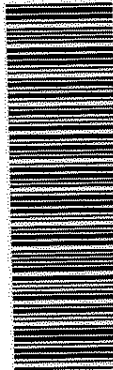
Sample Summary

Client: Buckeye Partners, L.P.
Project/Site: Buckeye-Texas HUB RCI, 3/13/24

Job ID: 560-116813-1

Lab Sample ID	Client Sample ID	Matrix	Collected	Received
560-116813-1	Waste Buckets	Water	03/13/24 14:35	03/13/24 15:18

- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 10
- 11



Client Information Phone: (301) 289-2471 Phone (301) 289-2013 Client Contact: David Long Company: Buckeye Partners, L.P. Address: 1501 Southern Minerals Road City: Corpus Christi State: TX Zip: 78409 Email: dlong@buckeye.com Project Name: Buckeye-Texas HUB RCI Site:		Sample Information Sample: <i>I. Mueblera</i> Lab PM: Tigrett, Lance E-Mail: E-Mail: Tigrett@et.eurofinsus.com PWSID:	
Due Date Requested: TAT Requested (days): <i>ASAP</i> Compliance Project: ☐ Yes ☒ No PO #: C1-250314 WO #: 56010061 Project #: 56010061 SSOW#:		Sample Identification Sample Date: 3-13-24 14:35 Sample Time: 14:35 Sample Type (C=comp, G=grab): G Matrix (liquid, solid, gas, other): Water Field Filtered Sample (Yes or No): ☒ Yes ☐ No Field Filtered Sample (Yes or No): ☒ Yes ☐ No	
Analysis Requested Preservation Codes: A HCL M Hexane B NaOH N None C Zn Acetate O AsNaO2 D Nitric Acid P Na2O4S E NaHSO4 Q Na2SO3 F MeOH R Na2SO3 G Amchlor S H2SO4 H Ascorbic Acid T TSP Dodecahydrate I Ice U Acetone J DI Water V MCAA K EDTA W pH 4-5 L EDA Y Trizma Z other (specify)		Special Instructions/Note: Loc: 560 116813	
Sample Disposal (A fee may be assessed if samples are retained longer than 1 month) ☐ Return To Client ☐ Disposal By Lab ☐ Archive For _____ Months		Special Instructions/QC Requirements:	
Possible Hazard Identification ☐ Non-Hazard ☐ Flammable ☐ Skin Irritant ☐ Poison B ☐ Unknown ☐ Radiological Deliverable Requested: I, II, III, IV Other (specify)		Empty Kit Relinquished by: Relinquished by: <i>[Signature]</i> Date: 3-13-24 / 1516 Company: <i>WFS</i>	
Custody Seals Intact: A Yes ☒ A No ☐		Custody Seal No. 311314 0524	

Chain of Custody Record



Environment Testing

[illegible]

Login Sample Receipt Checklist

Client: Buckeye Partners, L.P.

Job Number: 560-116813-1

Login Number: 116813

List Source: Eurofins Corpus Christi

List Number: 1

Creator: Stacy, Taylor

Question	Answer	Comment
Radioactivity wasn't checked or is <= background as measured by a survey meter.	N/A	
The cooler's custody seal, if present, is intact.	True	
Sample custody seals, if present, are intact.	True	
The cooler or samples do not appear to have been compromised or tampered with.	True	
Samples were received on ice.	True	
Cooler Temperature is acceptable.	False	Received same day of collection; chilling process has begun.
Cooler Temperature is recorded.	True	
COC is present.	True	
COC is filled out in ink and legible.	True	
COC is filled out with all pertinent information.	True	
Is the Field Sampler's name present on COC?	True	
There are no discrepancies between the containers received and the COC.	True	
Samples are received within Holding Time (excluding tests with immediate HTs)	True	
Sample containers have legible labels.	True	
Containers are not broken or leaking.	True	
Sample collection date/times are provided.	True	
Appropriate sample containers are used.	True	
Sample bottles are completely filled.	True	
Sample Preservation Verified.	True	
There is sufficient vol. for all requested analyses, incl. any requested MS/MSDs	True	
Containers requiring zero headspace have no headspace or bubble is <6mm (1/4").	True	
Multiphasic samples are not present.	True	
Samples do not require splitting or compositing.	True	
Residual Chlorine Checked.	N/A	Check done at department level as required.

Login Sample Receipt Checklist

Client: Buckeye Partners, L.P.

Job Number: 560-116813-1

Login Number: 116813

List Number: 2

Creator: Baker, Jeremiah

List Source: Eurofins Houston

List Creation: 03/16/24 10:31 AM

Question	Answer	Comment
The cooler's custody seal, if present, is intact.	True	
Sample custody seals, if present, are intact.	True	
The cooler or samples do not appear to have been compromised or tampered with.	True	
Samples were received on ice.	True	
Cooler Temperature is acceptable.	True	
Cooler Temperature is recorded.	True	
COC is present.	True	
COC is filled out in ink and legible.	True	
COC is filled out with all pertinent information.	True	
Is the Field Sampler's name present on COC?	True	
There are no discrepancies between the containers received and the COC.	True	
Samples are received within Holding Time (excluding tests with immediate HTs)	True	
Sample containers have legible labels.	True	
Containers are not broken or leaking.	True	
Sample collection date/times are provided.	True	
Appropriate sample containers are used.	True	
Sample bottles are completely filled.	True	
Sample Preservation Verified.	True	
There is sufficient vol. for all requested analyses, incl. any requested MS/MSDs	True	
Containers requiring zero headspace have no headspace or bubble is <6mm (1/4").	True	

APPENDIX 3.
BUCKEYE KURIDYNE P-123 SDS

Date : 9/12/2016

KURIDYNE P-123

1 IDENTIFICATION OF THE SUBSTANCE OR MIXTURE AND OF THE SUPPLIER

Product Name: KURIDYNE P-123
Product Use: Cleaning agent

Manufacturer: Kurita America, Inc.
16850 Diana Lane, Suite B 104, Houston, Texas 77058

Contact: Chemical Group
Phone: 281-998-3900
FAX: 281-998-3903
Emergency Telephone: CHEMTREC (Health/ Transport/ Regulatory)
1-800-424-9300
1-800-424-8802

2 HAZARDS IDENTIFICATION

Classification: Not classified to all hazard categories.

Physical Hazard

Explosives:	Not applicable
Flammable gases:	Not applicable
Flammable aerosols:	Not applicable
Oxidizing gases:	Not applicable
Gases under pressure:	Not applicable
Flammable liquids:	Not applicable
Flammable solids:	Not applicable
Self-reactive substances:	Not applicable
Pyrophoric liquids:	Not applicable
Pyrophoric solids:	Not applicable
Self-heating substances:	Not applicable
Substances which in contact with water emit flammable gasses:	Not applicable
Oxidizing liquids:	Not applicable
Oxidizing solids:	Not applicable
Organic peroxides:	Not applicable
Corrosive to metals:	Not classified

Health Hazard

Acute toxicity	
Oral:	Not classified
Dermal:	Not classified
Gases:	Not classified
Vapors:	Not classified

KURIDYNE P-123

Dust & mists:	Not classified
Skin corrosion/irritation:	Not classified
Serious eye damage/eye irritation:	Not classified
Respiratory sensitization:	Not classified
Skin sensitization:	Not classified
Germ cell mutagenicity:	Not classified
Carcinogenicity:	Not classified
Reproductive toxicology:	Not classified
Target organ systemic toxicity	
- Single exposure:	Not classified
Target organ systemic toxicity	
- Repeated exposure:	Not classified
Aspiration toxicity:	Not classified
Environmental Hazard	
Acute aquatic toxicity:	Not classified
Chronic aquatic toxicity:	Not classified
Signal word:	There are no signal word and no hazard statement allocated to all hazard categories.
Labeling:	There are no label element allocated to all hazard statement.
Hazard statements:	-
Precautionary statements:	-

3 COMPOSITION / INFORMATION ON INGREDIENTS

Chemical Name	CAS No.	Weight %
Organic acid	Not disclosed	Not disclosed
Phosphonate salt	Not disclosed	Not disclosed
Phosphoric acid	Not disclosed	Not disclosed

4 FIRST-AID MEASURES

Inhalation :	Remove victim from exposed area immediately to fresh air. Keep warm and at rest. Get medical attention.
Skin contact:	May cause irritation. Wash the affected area with plenty of water. Take off immediately contaminated clothes. Wash it plenty of water. If burns occur, get medical attention.

KURIDYNE P-123

Eye contact: May causes eye irritation. Wash eyes immediately with large amount of water, occasionally lifting upper and lower eyelids for more than 15 minutes. Get medical attention immediately.

Ingestion: Give large amount of water or milk immediately. Do not induce vomiting. Get medical attention immediately.

5 FIRE-FIGHTING MEASURES

Keep away from the source of fire or cool containers with water in case of difficult transportation. Use extinguishing media appropriate for surrounding fire.

6 ACCIDENTAL RELEASE MEASURES

Wear protective clothes. Stop leak. For small liquid spills, flush area with flooding amount of water. For large spills, stop the flow with dike, etc. without making liquid flow into sewer. Thoroughly rinse affected ground with plenty of water.

7 HANDLING AND STORAGE

Precautions for safe handling: Operate with filter respirator, chemical safety goggles, working clothes with long sleeve and rubber globs to avoid inhalation, eye and skin contact.

Conditions for safe storage: Store product in tightly closed containers in the cool, dry and well ventilated indoor area.

Dealing: Do not use empty container for drinking water supply.

8 EXPOSURE CONTROL / PERSONAL PROTECTION

Exposure limits:

Acetic acid

ACGIH (TLV-TWA)
25mg/m3
-
-

Engineering controls: Not applicable

Personal protective equipment

Respiratory protection: Filter respirator

Skin protection: Wear Synthetic rubber made gloves.
Wear long-sleeve clothes.

Eye protection: Chemical safety goggles.

KURIDYNE P-123

9 PHYSICAL AND CHEMICAL PROPERTIES

Appearance:	Colorless
Physical state:	Liquid
Specific gravity:	1.30 - 1.36 (20 dC)
Solubility:	Miscible at any ratio
Odor:	Not applicable
Freezing Point:	less than - 15 °C
Flash Point:	Not applicable
pH:	6.2 - 7.2 (20 dC)
CODmn:	4.7%

10 STABILITY AND REACTIVITY

Stability: Stable on normal usage and handling.

11 TOXICOLOGICAL INFORMATION

Acute toxicity:

LD (50) oral/rabbit: 2,100 mg/kg

Skin corrosion/irritation: May cause irritation.

Serious eye damage/eye irritation: May causes eye irritation.

12 ECOLOGICAL INFORMATION

Aquatic toxicity:

LC (50) killifish 24hrs: 18,000 mg/l

13 DISPOSAL CONSIDERATIONS

Never draw chemical directly to waste water, sewer on the ground, or into any body of water. Dispose of this material and its container to a licensed waste agency.

Empty used containers completely. Consulted with local Waste Treatment Specialist before disposal.

14 TRANSPORT INFORMATION

UN Class : Not applicable

UN No. : Not applicable

Packing Group : Not applicable

Prevent destruction by keeping away from water and careless dealing.

KURIDYNE P-123

15 REGULATORY INFORMATION

All components of this product are included on the TSCA inventory.

16 OTHER INFORMATION

The information contained herein is, to the best of our knowledge and belief, accurate. However, no warranty is expressed or implied regarding the accuracy of this data or the results to be obtained from the use thereof. Vendor assumes no responsibility for injury to vendee or third person proximately caused by the material if reasonable safety procedures are not adhered to as stipulated in the data sheet. Additionally, vendor assumes no responsibility for injury to vendee or third persons proximately caused by abnormal use of the material even if reasonable safety procedures are followed. Furthermore, vendee assumes the risk in this use of the material.

APPENDIX 4.
BOL HYDRAULIC OIL TO WGR AND FULL EMAIL

RE: Follow-up from EPA Visit 3/11/2024

Long, David <DLong@buckeye.com>

Fri 3/22/2024 12:19 PM

To: Vince Damiano <Vince.Damiano@erg.com>; Andrew Gates <andrew.gates@erg.com>; Johnson, Joyce-R6 <johnson.joyce-r6@epa.gov>; Young-Dahl, Erin <YoungDahl.Erin@epa.gov>
Cc: Cummings, Anthony <ACummings@buckeye.com>; Hamlin, Steven <SHamlin@buckeye.com>

📎 3 attachments (1 MB)

J116813-1 UDS Level 2 Report Final Report.pdf; SDS KURIDYNE P-123.pdf; BOL_hydraulic oil to Western Gulf.pdf;

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

Good Morning,

We wanted to take a moment to provide an update for Buckeye Texas HUB “EPA Visit 3/11/2024.” Following a review of the attached characteristic results and SDS, Buckeye confirmed the determination of this hydraulic fluid to be unused and scheduled to have this material recycled locally at Western Gulf Recycling (see attached Bill of Lading) for beneficial re-use and/or resale following separation of potential water. This material was transported to Western Gulf by Miller Environmental on 3/22/2024.

Please reach out to myself for any further questions.

Thank you and have a great weekend,

David Long

HSSE-Environmental Specialist

South Texas District

7209 UP River Rd.

Corpus Christi, TX 78409

Mobile: (361) 813-6084 | Office: (361) 792-3093

DLong@buckeye.com



From: Long, David

Sent: Friday, March 15, 2024 10:26 AM

To: 'Vince Damiano' <Vince.Damiano@erg.com>; Cummings, Anthony <ACummings@buckeye.com>; Hamlin, Steven <SHamlin@buckeye.com>

Cc: 'Andrew Gates' <andrew.gates@erg.com>; 'Johnson, Joyce-R6' <johnson.joyce-r6@epa.gov>; 'Young-Dahl, Erin' <YoungDahl.Erin@epa.gov>

Subject: RE: Follow-up from EPA Visit 3/11/2024

Good Morning,

We wanted to take a minute to provide an update for Buckeye Texas HUB “EPA Visit 3/11/2024”

Below are photos of the damaged 2 5-gallon buckets of suspected un-used hydraulic fluid in the Mississippi Sands Warehouse. These items were moved to the containment area and sampled for characterization (COC attached). Base on the SDS for the material (attached), Buckeye analyzed for reactivity, corrosivity, and ignitability. Results expected by Monday (3/18) from Eurofins. A determination and final action will follow the week of 3/18.



Thankyou,

David Long

HSSE-Environmental Specialist

South Texas District

7209 UP River Rd.

Corpus Christi, TX 78409

Mobile: (361) 813-6084 | Office: (361) 792-3093

DLong@buckeye.com



From: Long, David

Sent: Tuesday, March 12, 2024 9:08 AM

To: Vince Damiano <Vince.Damiano@erg.com>; Cummings, Anthony <ACummings@buckeye.com>;
Hamlin, Steven <SHamlin@buckeye.com>

Cc: Andrew Gates <andrew.gates@erg.com>; Johnson, Joyce-R6 <johnson.joyce-r6@epa.gov>; Young-Dahl, Erin
<YoungDahl.Erin@epa.gov>

Subject: RE: Follow-up from EPA Visit 3/11/2024

Good Morning,

We'll be working on getting these items disposed of and will send the documentation/determination/process soon. Thanks for your quick summary/response.

David Long

HSSE-Environmental Specialist

South Texas District

7209 UP River Rd.

Corpus Christi, TX 78409

Mobile: (361) 813-6084 | Office: (361) 792-3093

DLong@buckeye.com



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

Sent: Monday, March 11, 2024 5:54 PM

To: Long, David <DLong@buckeye.com>; Cummings, Anthony <ACummings@buckeye.com>; Hamlin, Steven <SHamlin@buckeye.com>

Cc: Andrew Gates <andrew.gates@erg.com>; Johnson, Joyce-R6 <johnson.joyce-r6@epa.gov>; Young-Dahl, Erin <YoungDahl.Erin@epa.gov>

Subject: Follow-up from EPA Visit 3/11/2024

WARNING: This email originated outside of Buckeye Partners, L.P.
DO NOT CLICK links or attachments unless you recognize the sender and know the content is safe.

If you have any questions please contact the Buckeye Partners service desk.

Hello All,

I am following up with a list of items and notes from our inspection today. We would like you to send us:

- Follow-up on the two 5-gallon containers of hydraulic fluid found in storage area. Please provide a waste determination and information on how you decide to manage the fluid.

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. Any follow-up can be sent to myself and the persons attached.

Thanks,
Vince

Vince Damiano



Chemical Engineer, Chantilly Office

Cell: (570) 956-1468

Vince.Damiano@erg.com

SRQ 00415326
WDR 8707

STRAIGHT BILL OF LADING

ORIGINAL - NOT NEGOTIABLE

MILLER ENVIRONMENTAL SERVICES, LLC

P.O. Box 5233
Corpus Christi, Texas 78465
(Name of Carrier)

Shipper No. B 16793

Carrier No.

Date 3/22/24

TO: Consignee	Western Gulf Recycling	FROM: Shipper	Buckeye Tx Hub
Street	7434 Bearden Dr.	Street	7002 Marvin Berry Rd.
Destination	Corpus Christi, TX 78409	Origin	Corpus Christi, TX 78409
		Emergency Response Phone No.	Vehicle Number

Route	No. Shipping Units	HM*	Kind of Packaging, Description of Articles, Special Marks and Exceptions	Weight (subject to correction)	Rate	CHARGES
	2	DF	Non-DOT Regulated (Hydraulic Oil)	20 lbs		

When transporting hazardous materials include the technical or chemical name for H.S.S. (not otherwise specified) or generic description of material with appropriate UN or NA number as defined in US DOT Emergency Communication Standard (48 CFR 172.101). Provide emergency response phone number in case of incident or accident in box above.

REMIT C.O.D. TO: ADDRESS:	COD Amt: \$	C.O.D. FEE: PREPAID ☐ COLLECT ☐ \$
NOTE: - Where the rate is dependent on value, shipper is required to state specifically in writing the agreed or declared value of the property. The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding \$ _____ per _____	This is to certify that the above named materials are properly classified, described, packaged, marked, and labeled, and are in proper condition for transportation according to the applicable regulations of the Department of Transportation.	TOTAL CHARGES: \$
	Subject to Section 7 of the conditions, if this shipment is to be delivered to the consignee without recourse on the consignor, the consignor shall sign the following statement: The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges. _____ (Signature of Consignor)	FREIGHT CHARGES: FREIGHT PREPAID ☐ Check box if charges except when box is right is checked ☐ are to be collect

RECEIVED, subject to the classifications and lawfully filed tariffs in effect on the date of the issue of this Bill of Lading, the property described above in apparent good order, except as noted (contents and condition of contents of packages unknown), marked, consigned and destined as indicated above which said carrier (the word "carrier" being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination if on its route, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed as to each carrier of all or any of said property over all or any portion of said route to destination and as to each party at any time interested in all or any said property, that every service to be performed hereunder shall be subject to all the Bill of Lading terms and conditions in the governing classification on the date of shipment.

Shipper hereby certifies that he is familiar with all the Bill of Lading terms and conditions in the governing classification and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.
NOTICE: Freight moving under this Bill of Lading is subject to the classifications and lawfully filed tariffs in effect on the date of this Bill of Lading. This notice supersedes and negates any claimed, alleged or asserted oral or written contract, promise, representation or understanding between the parties with respect to this freight, except to the extent of any written contract which establishes lawful contract carriage and is signed by authorized representatives of both parties to the contract.

SHIPPER	BORIS SALAZAR	CARRIER	MILLER ENVIRONMENTAL SERVICES, LLC
PER	BT HUB	PER	[Signature]
		DATE	3-22-24

HAZARDOUS MATERIALS MARK WITH "X" TO DESIGNATE HAZARDOUS MATERIALS AS REFERENCED IN 48 CFR § 172.101.