

INSPECTION REPORT

Inspection Entry Date/Time	4/18/2024 09:05 AM (CT)	Announced: No		
Inspection Exit Date/Time	4/18/2024 11:37 AM (CT) Closing Conference	Access: Granted		
Regulatory Program	RCRA			
Type of Inspection	Focused Compliance Inspection (FCI)			
Facility or Site Name	Bollinger Fourchon, LLC			
Facility/Site Identifier	LAR000087007			
Facility/Site Physical Address	236 AT Gisclair Rd			
City, State, Zip Code	Golden Meadow, LA 70357			
County/Borough	Lafourche Parish			
Generator Status	Large Quantity Generator (LQG)			
NAICS	<u>336611</u>			
Type of Operation	Ship Building and Repairing			
Geographic Coordinates	29.127224, -90.196032			
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
Bollinger Fourchon, LLC	4/18/24	Bollinger Fourchon, LLC (Bollinger) has a north yard and a south yard. The north yard operates as a dry dock for ship repairs and maintenance including welding, cutting, fitting, slurry blasting, and small-scale painting operations. Bollinger will occasionally take used oil and universal waste batteries and lamps from ships for transfer offsite, if these materials need to be removed to perform ship repairs. Bollinger's north yard is registered as an LQG of hazardous waste, which it generates from painting operations. Bollinger maintains a MARPOL COA for Annex V and allows third parties onsite to remove APHIS waste from international ships. Bollinger's south yard is not a dry dock; it is mainly used for storage or staging vessels, with some minor ship repairs performed at the site. The south yard is registered as a VSQG of hazardous waste. A walk through of the south yard was not included as part of this inspection.	Yes

SECTION II – OBSERVATIONS

Tenant: Bollinger Fourchon, LLC			
Section: 2		Date: 4/18/2024, 9:05 A.M.	Contains AOC: Yes Contains CBI: No
Lead Inspector: Brook McKeown		Attendees: Shane Bond (Environmental Representative), Jon Degruise (General Manager), Carlton Guidry (Medical/Safety/FSO)	
Facility personnel provided the inspection team with an overview of operations at Bollinger. Bollinger operates as a dry dock and performs ship repairs which includes welding, cutting, painting, and fitting operations. Bollinger has a north and south facility at Port Fourchon. The south facility is registered as a VSQG (LAR000023481) and is primarily used for storing equipment and supplies and staging vessels, with minor vessel repairs performed on site. The operations at the south facility were not observed as part of the inspection. The north facility includes most of the Bollinger operations at Port Fourchon and operates as a LQG of hazardous waste (LAR000087007). Bollinger does not perform tank cleaning operations for ships; however, it does allow third parties to come onsite at its north facility and perform fuel tank cleaning for ships. While third parties are cleaning fuel tanks onsite, Bollinger may temporarily store the diesel product from the ships’ tanks in frac tanks onsite, but Bollinger does not accept any tank residuals or washwater from ships. Bollinger does accept used oil and universal waste batteries and lamps from ships, when they need to be removed to conduct repairs. Therefore, Bollinger may be considered a co-generator of the used oil, batteries and lamps generated from repair activities. These wastes are kept on site in designated areas. Bollinger sends used oil to American Recovery, and sends universal waste to LEI in Hammond, LA. Bollinger also allows third parties on site to remove APHIS waste from international ships if needed. Bollinger does perform water washing on ship exteriors as well as slurry blasting (pressurized sand and water). Rinse water from washing is typically discharged without treatment, but it may be sent off site as oily water if a sheen is observed. Slurry blasting media is used once or twice before being placed in lined dumpsters and sent off site as nonhazardous waste. Bollinger also generates paint waste, used oil and filters, and universal waste during its operations on site. Paint waste is managed in containers as hazardous waste, and Bollinger manages one CAA for hazardous waste on site. Used oil generated on site is managed in containers in a designated area along with any used oil removed from ships. Universal waste generated on site includes batteries and lamps, and universal waste generated on site is managed in a designated area along with any universal waste removed from ships. After the opening meeting, the inspection team conducted a visual walkthrough of the facility and dock areas starting at approximately 9:50 AM. The inspection team first observed the Paint Waste Area, which is managed as a CAA (see Appendix 1 – Photo 5). There was one 55-gallon drum labeled as hazardous waste at the CAA with a date of 4/17/2024. Mr. Bond stated that the paint waste primarily consists of paint thinners characterized as ignitable hazardous waste, and that SAAs are located around the site as needed with waste transferred back to the hazardous waste drum in the CAA. The inspection team observed cigarette butts on the ground near the CAA as evidence of smoking in the area, despite a “No Smoking” sticker on the CAA secondary containment structure (see Appendix 1 – Photos 3 and 4) [AOC #1: Bollinger did not take precautions to protect and separate ignitable waste from smoking as a source of ignition. – 40 CFR 262.17(a)(1)(vi)(B)]. Next to the CAA, the inspection team also observed a Paint Can Drying Area (see Appendix 1 – Photos 1, 2, and 6). Mr. Bond stated that the paint cans in the drying area are first emptied into the 55-gallon hazardous waste drum in the CAA to be “RCRA empty” before turning upside down in the drying area, with only a few drips left in the cans. The containment for the Paint Can Drying Area was lined, and the inspection team only observed some residual accumulated precipitation in			

the lining.

The inspection team then moved to the slurry blasting area. Mr. Bond stated that the collected waste slurry used for blasting is re-sampled every 3 months to ensure that it is nonhazardous. No apparent AOCs were noted at the slurry blasting area at the time of the inspection. The inspection team then moved to the Nonhazardous Container Area, which is used to store empty containers as well as containers of used oil, oily water, or product material from customers. Mr. Bond stated that totes of used oil are reused until the tote is stained, and used oil is sucked out by vacuum truck from American Recovery when taken off site. The inspection team also observed what appeared to be potential soil staining on the ground, and Mr. Bond was notified since the source of the staining was uncertain, as it had just recently rained. The inspection team then moved to the Universal Waste Area on site, located in a warehouse. The Universal Waste Area had the following.

- Two pallets of universal waste used batteries that were labeled and dated with an earliest accumulation start date of 11/16/2023.
- Two boxes of used lamps that were labeled and dated with an earliest accumulation start date of 7/1/2023. The boxes were in good condition and closed.
- A 55-gallon drum of aerosol cans labeled as hazardous waste and managed as a SAA container.

The inspection team did not observe any other apparent AOCs at the time of the inspection.

A closing conference was conducted at approximately 11:25 PM with Bollinger personnel. The AOC and two recommendations 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 AOC identified. Bollinger provided example manifests and a response to the AOC via email on 5/1/2024. Bollinger's email response can be found in Appendix 2. The inspection team noted the following after reviewing the email response and provided documentation.

- Bollinger posted additional "No Smoking" signage at the CAA on site and conducted additional training for workers pertaining to hazardous waste storage requirements, including smoking restrictions (photo and training log in Appendix 2).

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: Bollinger Fourchon, LLC		
AOC #1 – Bollinger did not take precautions to protect and separate ignitable waste from smoking as a source of ignition.	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 the AOCs or provision of documents requested.

Communication Log

During and after the inspection, additional information was emailed to EPA on 5/1/2024. In the email correspondence, Jodi Satches provided requested documentation, a photograph showing “No Smoking” signage at the CAA on site, and written responses to areas of concern.

SECTION VI – LIST OF APPENDICES

Appendix 1. Photograph Log

Appendix 2. Bollinger Response on 05/01/24

APPENDIX 1.
PHOTOGRAPH LOG



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 1

Location: Bollinger Fourchon North		
City: Golden Meadow	County/Parish: Lafourche	State: Louisiana



Photo File Name: DSCN1049

Date of Photo: 04/18/2024

Time of Photo: 10:18 hrs.

Photographer: George Wieber

Description: View of the paint can drying area where RCRA-empty paint cans are overturned and residuals allowed to dry before paint can disposal.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 2

Location: Bollinger Fourchon North		
City: Golden Meadow	County/Parish: Lafourche	State: Louisiana



Photo File Name: DSCN1050

Date of Photo: 04/18/2024

Time of Photo: 10:18 hrs.

Photographer: George Wieber

Description: View of the grating at the paint can drying area. Residuals on the grating were dry, and no liquid paint was accumulated in the plastic sheeting below the grating.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 3

Location: Bollinger Fourchon North		
City: Golden Meadow	County/Parish: Lafourche	State: Louisiana



Photo File Name: DSCN1051

Date of Photo: 04/18/2024

Time of Photo: 10:26 hrs.

Photographer: George Wieber

Description: View of the CAA labeling, including a "No Smoking" sign to the bottom right.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 4

Location: Bollinger Fourchon North		
City: Golden Meadow	County/Parish: Lafourche	State: Louisiana



Photo File Name: DSCN1052

Date of Photo: 04/18/2024

Time of Photo: 10:26 hrs.

Photographer: George Wieber

Description: Cigarette butt observed on the ground immediately adjacent to the CAA on site, which held ignitable hazardous waste.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Photograph Log

Photo No. 5

Location: Bollinger Fourchon North		
City: Golden Meadow	County/Parish: Lafourche	State: Louisiana



Photo File Name: DSCN1053

Date of Photo: 04/18/2024

Time of Photo: 10:26 hrs.

Photographer: George Wieber

Description: View of the CAA on site to the right of the image. There was one 55-gallon drum of hazardous waste present in the CAA at the time of the inspection. The covered structure to the left of the image is for raw materials.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Photograph Log

Photo No. 6

Location: Bollinger Fourchon North		
City: Golden Meadow	County/Parish: Lafourche	State: Louisiana



Photo File Name: DSCN1054

Date of Photo: 04/18/2024

Time of Photo: 10:26 hrs.

Photographer: George Wieber

Description: View of the paint can drying area and nonhazardous waste disposal bin.

APPENDIX 2.
BOLLINGER RESPONSE ON 05/01/24