

INSPECTION REPORT

Inspection Entry Date/Time	04/18/2024 10:41 (CT)			Announced: No
Inspection Exit Date/Time	04/18/2024 11:50 (CT)			Access: Granted
Regulatory Program	RCRA			
Type of Inspection	Focused Compliance Inspection (FCI)			
Facility or Site Name	Canal Barge Company, Inc.			
Facility/Site Identifier	N/A			
Facility/Site Physical Address	1891 Swisco Rd			
City, State, Zip Code	Sulphur, LA 70665			
County/Borough	Calcasieu Parish			
Generator Status	None			
NAICS	N/A			
Type of Operation	Canal Barge Company, Inc. transports cargoes between major oil refineries using tugboats and barges			
Geographic Coordinates	30.209925, -93.338545			
Additional Persons Participating in Inspection:				
Name	Title	Organization	Email	Phone
Elizabeth Pham	Inspector	EPA REGION 6	Pham.elizabeth@epa.gov	(214) 665-8354
Sandesh Thapa	Inspector	EPA REGION 6	Thapa.sandesh@epa.gov	(214) 665-2265
Anshul Paripati	Contractor	Eastern Research Group (ERG)	Anshul.Paripati@erg.com	(571) 535-1503
Lead Inspector:				
Cameron Tanaka				07/24/2024
	ERG		Cameron.Tanaka@erg.com	(703) 633-1632 ext. 11632

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

Type of inspection: Focused Compliance Inspection (FCI)

The Port of Lake Charles 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	Cameron Tanaka	(703) 633-1632 ext. 11632	Cameron.Tanaka@erg.com	Yes	No
RCRA Inspector/ Contractor/ERG	Anshul Paripati	(571) 535-1503	Anshul.Paripati@erg.com	Yes	Yes
Inspector/Enforcement Officer/EPA Region 6	Elizabeth Pham	(214) 665-8354	Pham.elizabeth@epa.gov	Yes	Yes
Inspector/Enforcement Officer/EPA Region 6	Sandesh Thapa	(214) 665-2265	Thapa.sandesh@epa.gov	Yes	Yes

Facility General Description

Tenant/Area	Inspection Date	Process Description	Area of Concern
Canal Barge Company, Inc.	04/18/24	Canal Barge Company, Inc. (Canal Barge) operates tugboats and barges on the waterways near Sulphur/Lake Charles. They transport cargoes between major oil refineries. They load and unload cargo (product) at the ports, such as lube oils and various unused chemicals. The location the inspection team visited is only involved in coordinating cargo transfers. They generally do not receive any waste but occasionally receive old appliances, scrap, used batteries, or damaged goods. They do not have a MARPOL certificate.	Yes

SECTION II – OBSERVATIONS

Tenant: Canal Barge Company, Inc.			
Section: 2.1	Date: 04/18/24, 10:41 AM	Contains AOC: Yes	Contains CBI: No
Lead Inspector: Cameron Tanaka	Attendees: Logan Mills (Purchaser/Warehouse Manager) and Derek Adams (Operations Manager)		
Canal Barge is a tugboat and barge company that transports cargo between docks with a fleet of 400 barges used to transport materials for major oil and chemical companies. These cargoes include various product chemicals and lube oils. Any spills of these materials are the major oil or chemical company's responsibility. For spills, third party spill response companies are contacted to clean the spill with help from the responsible company. Waste generated from their vessels, including used oil, bilge, and slops, are removed via Stone Fuel barges, a third-party fueling company. Their physical location that the team inspected is just for cargo transfers and coordinating transportation. They generally do not bring any waste onto their site except for household garbage, occasional e-waste, broken dryers, stoves, icemakers, fridges, and used batteries. These wastes are transported to VLS in Hackberry, LA. Freight trucks transport cargoes and waste materials to and from their physical location. For broken appliances that are brought on-site, Canal Barge will attempt to repair the appliances first. If they cannot repair the appliances, the appliance will be sent back to the company that originally owned it or the broken appliance will be scrapped. Used batteries are sent back for their cores to the battery supplier and swapped with new ones. Occasionally, Canal Barge's freight trucks will deliver damaged good with leaks, including paint cans. These are moved to a secure location and taken to VLS in Hackberry. Canal Barge does not have an EPA ID or a MARPOL COA. After the opening meeting, the inspection team performed a walk-through inspection of the facility's warehouse and yard area outside the warehouse. No AOCs were observed inside the warehouse. Yard Area Outside Warehouse In the yard area, the inspection team observed a barrel of synthetic lubricant with some remaining material on a pallet (see Appendix 1 – Photos 1 and 2). Mr. Mills explained that the drum was returned with very little liquid left and that he was unsure if the material was used or not. In a follow-up email from May 18, Mr. Adams explained that "The partial barrel of lubricant has been removed from the property by an approved disposal facility (Environmental Resource Services, Inc.)" (see Appendix 2). The inspection team also viewed a pallet of used batteries that were not labeled or dated (see Appendix 1 – Photos 3 and 4). [AOC #1 – Canal Barge did not label or mark clearly their used batteries with any one of the following phrases: "Universal Waste-Battery(ies)," or "Waste Battery(ies)," or "Used Battery(ies)." - 40 CFR 273.14(a); AOC #2 – Canal Barge did not provide a demonstration of the length of time that the universal waste has been accumulated from the date it becomes a waste or is received. - 40 CFR 273.15(c)] In the follow-up email, Mr. Adams explained that "The used batteries have been labeled and dated, until we can have them exchanged as cores with our vendor or properly disposed of." (see Appendix 2). Waste Lot The inspection team also viewed a small, expired paint can that was mostly full and a chemical container that was about half full of unknown material located next to their broken appliances in their waste lot (see Appendix 1 – Photos 5 and 6). [AOC #3 – Canal Barge did not make an accurate determination as to whether their waste is a hazardous waste in order to ensure wastes are properly managed according to applicable RCRA regulations. - 40 CFR 262.11] In the follow-up email, Mr. Adams explained that "These items have been removed from the property by an approved disposal facility (Vessel Cleaning, LLC)." (see Appendix 2).			

The inspection team did not observe other AOCs at the time of the inspection. A closing conference was conducted at approximately 11:40 AM with Canal Barge personnel. The AOCs were communicated during the closing.

SECTION III – RECORDS REVIEW

No RCRA regulated records reviewed during this focused onsite inspection.

SECTION IV – APPARENT AREAS OF CONCERN

The presentation of Area(s) of Concern does not constitute a formal compliance determination or violation.

Tenant: Canal Barge Company, Inc.		
AOC #17 – Canal Barge did not label or mark clearly their used batteries with any one of the following phrases: "Universal Waste-Battery(ies)," or "Waste Battery(ies)," or "Used Battery(ies)."	Citation: 40 CFR 273.14(a)	Section: 2.1
AOC #2 – Canal Barge did not provide a demonstration of the length of time that the universal waste has been accumulated from the date it becomes a waste or is received.	Citation: 40 CFR 273.15(c)	Section: 2.1
AOC #3 – Canal Barge did not make an accurate determination as to whether their waste is a hazardous waste in order to ensure wastes are properly managed according to applicable RCRA regulations.	Citation: 40 CFR 262.11	Section: 2.1

SECTION V – FOLLOW UP**Follow-Up**

Any facility follow-up items are as discussed in each facility's observations in Section II. Documents or files provided by the facilities were transmitted via email and included responses to areas of concern or provision of documents requested.

Communication Log

During and after the inspection, additional information was emailed to EPA including:

1. 05/08/24 Canal Barge email – Derek Adams sent an email with a photograph and several descriptions of corrective actions implemented at the site.

SECTION VI – LIST OF APPENDICES

Appendix 1. Photograph Log

Appendix 2. Follow-Up Email and Photograph from Canal Barge

APPENDIX 1.
PHOTOGRAPH LOG



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 1

Location: Canal Barge Company, Inc.

City: Sulphur

County/Parish: Calcasieu

State: Louisiana



Photo File Name: DSCN7193

Date of Photo: 04/18/2024

Time of Photo: 10:27 hrs.

Photographer: Anshul Paripati

Description: A barrel of synthetic lubricant with some remaining material on a pallet in Canal Barge's yard area outside their warehouse.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Photograph Log

Photo No. 2

Location: Canal Barge Company, Inc.		
City: Sulphur	County/Parish: Calcasieu	State: Louisiana



Photo File Name: DSCN7194

Date of Photo: 04/18/2024

Time of Photo: 10:27 hrs.

Photographer: Anshul Paripati

Description: Closeup of a barrel of synthetic lubricant with some remaining material on a pallet in Canal Barge's yard area outside their warehouse.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 3

Location: Canal Barge Company, Inc.

City: Sulphur

County/Parish: Calcasieu

State: Louisiana



Photo File Name: DSCN7195

Date of Photo: 04/18/2024

Time of Photo: 10:29 hrs.

Photographer: Anshul Paripati

Description: Overview of a pallet of used batteries that were not labeled in Canal Barge's yard area outside their warehouse.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 4

Location: Canal Barge Company, Inc.		
City: Sulphur	County/Parish: Calcasieu	State: Louisiana



Photo File Name: DSCN7196

Date of Photo: 04/18/2024

Time of Photo: 10:29 hrs.

Photographer: Anshul Paripati

Description: Close up view of a pallet of used batteries that were not labeled in Canal Barge's yard area outside their warehouse.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 5

Location: Canal Barge Company, Inc.		
City: Sulphur	County/Parish: Calcasieu	State: Louisiana



Photo File Name: DSCN7197

Date of Photo: 04/18/2024

Time of Photo: 10:36 hrs.

Photographer: Anshul Paripati

Description: View of an expired paint can and a chemical container with unknown material in it in Canal Barge's waste lot.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 6

Location: Canal Barge Company, Inc.		
City: Sulphur	County/Parish: Calcasieu	State: Louisiana



Photo File Name: DSCN7198

Date of Photo: 04/18/2024

Time of Photo: 10:36 hrs.

Photographer: Anshul Paripati

Description: Closeup view of an expired paint can and a chemical container with unknown material in it in Canal Barge's waste lot.

APPENDIX 2.
FOLLOW-UP EMAIL AND PHOTOGRAPH FROM CANAL BARGE

RE: Follow-Up from EPA Inspection 4/18 (Canal Barge)

Derek Adams <dadams@canalbarge.com>

Wed 2024-05-08 1:14 PM

To: Cameron Tanaka <Cameron.Tanaka@erg.com>; Logan Mills <lmills@canalbarge.com>

Cc: Anshul Paripati <Anshul.Paripati@erg.com>; Joe Watson <Joe.Watson@erg.com>; Pandak, Debra (she/her/hers) <Pandak.Debra@epa.gov>; Ramrakha, Jayshika <Ramrakha.Jayshika@epa.gov>; Pham, Elizabeth <Pham.Elizabeth@epa.gov>; Thapa, Sandesh <Thapa.Sandesh@epa.gov>

 1 attachments (605 KB)

1000004464.jpg;

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

Hello Cameron,

Thank you for the follow up. It was a pleasure meeting with you all. As far as the observations below, we want to inform you all that these items have been corrected. We have also attached the documentation for the disposal of the items listed below.

- A barrel of synthetic lubricant with some remaining unused material was on a pallet outside of your warehouse.
The partial barrel of lubricant has been removed from the property by an approved disposal facility (Environmental Resource Services, Inc.).
- Used batteries on a pallet were not labelled and dated.
The used batteries have been labeled and dated, until we can have them exchanged as cores with our vendor or properly disposed of.
- Apparent expired paint and a mostly empty chemical container was located next to your broken appliances in the waste lot.
These items have been removed from the property by an approved disposal facility (Vessel Cleaning , LLC).

Thank you and please let us know if you have any additional questions,

Derek Adams
Field Operations Manager
Canal Barge Company, Inc.

E-Mail: dadams@canalbarge.com
Phone: 337-528-7910 | Mobile: 504-908-5090
1891 Swisco Road, Sulphur, LA 70665
www.canalbarge.com

From: Cameron Tanaka <Cameron.Tanaka@erg.com>

Sent: Thursday, April 18, 2024 7:37 PM

To: Logan Mills <lmills@canalbarge.com>; Derek Adams <dadams@canalbarge.com>

Cc: Anshul Paripati <Anshul.Paripati@erg.com>; Joe Watson <Joe.Watson@erg.com>; Pandak, Debra (she/her/hers) <Pandak.Debra@epa.gov>; Ramrakha, Jayshika <Ramrakha.Jayshika@epa.gov>; Pham, Elizabeth <Pham.Elizabeth@epa.gov>; Thapa, Sandesh <Thapa.Sandesh@epa.gov>

Subject: Follow-Up from EPA Inspection 4/18 (Canal Barge)

CAUTION: This email originated from outside of the Canal Barge email system.
DO NOT click links or open attachments unless you recognize the sender and know the content is safe.

Hello Logan and Derek,

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

- Your EPA ID if you find you have one

Additionally, we had the following observations. If you have any responses, clarification or documentation of corrective actions, we ask that you provide those to us as soon as possible, and we will incorporate those into the report (ideally within two weeks to be included in the report).

- A barrel of synthetic lubricant with some remaining unused material was on a pallet outside of your warehouse.
- Used batteries on a pallet were not labelled and dated.
- Apparent expired paint and a mostly empty chemical container was located next to your broken appliances in the waste lot.

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, or if you would like any guidance on how to work to address these observations. Any follow-up can be sent to myself, and the persons attached.

Thanks,

Cam

Cameron Tanaka (he/him)

Eastern Research Group, Inc.

cameron.tanaka@erg.com

Cell: (508) 314-6432

CanalBarge WARNING This message originated from outside of our company. Use Email security best practices before deciding to click links or reply to this message.

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UNIVERSAL WASTE BATTERIES

1-1-2024

