

INSPECTION REPORT

Inspection Entry Date/Time	3/24/2025 12:45 (CT)		Announced: No
Inspection Exit Date/Time	3/24/2025 14:35 (CT)		Access: Granted
Regulatory Program	RCRA		
Type of Inspection	Compliance Evaluation Inspection (CEI)		
Facility or Site Name	Coral Marine Services LLC		
Facility/Site Identifier	LAD985206960		
Facility/Site Physical Address	887 Degraeville Rd.		
City, State, Zip Code	Amelia, LA 70340		
County/Borough	St. Mary		
Generator Status	VSQG		
NAICS	336611		
Type of Operation	Coral Marine Services LLC (CMS) conducts tank cleanings of boats, vessels, and barges, along with performing repairs and maintenance on boats in their marine division.		
Geographic Coordinates	29.6634, -91.1276		
Additional Persons Participating in Inspection:			
Name	Title	Organization	Email
John Penland	Inspector	EPA REGION 6	Penland.John@epa.gov
Erin Young-Dahl	Inspector	EPA REGION 6	Youngdahl.Erin@epa.gov
Janosh Wolters	Contractor	Eastern Research Group (ERG)	Janosh.Wolters@erg.com
Lead Inspector:			
Vince Damiano		Vincent Damiano	Digitally signed by Vincent Damiano Date: 2025.05.01 15:57:04 -04'00'
	ERG	Vince.Damiano@erg.com	

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

The Port of Morgan City and surrounding facilities were selected for inspection based on a 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 other 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 Environmental Protection Agency (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	Email	Opening Conf.	Closing Conf.
Lead Inspector/ Contractor/ERG	Vince Damiano	Vince.Damiano@erg.com	Yes	Yes
Inspector/Enforcement Officer/EPA Region 6	John Penland	Penland.John@epa.gov	Yes	Yes
Inspector/Enforcement Officer/EPA Region 6	Erin Young- Dahl	Youngdahl.Erin@epa.gov	Yes	Yes
RCRA Inspector/ Contractor/ERG	Janosh Wolters	Janosh.Wolters@erg.com	Yes	Yes
Coral Marine Services/Manager	Sean Carpenter	scarpenter@coralmarineservices.net	Yes	Yes

Facility General Description

Tenant/Area	Inspection Date	Process Description	Area of Concern
Coral Marine Services LLC	3/24/25	CMS conducts tank cleanings of boats, vessels, and barges, along with performing repairs and maintenance on boats in their marine division. CMS transports and stores used oil from their tank cleanings at their facility. CMS does not operate under a MARPOL COA.	Yes

SECTION II – OBSERVATIONS

Facility: Coral Marine Services LLC			
Section: 2.1	Date: 3/24/25, 12:45 AM	Contains AOC: Yes	Contains CBI: No
Lead Inspector: Vince Damiano	Attendees: Sean Carpenter (Manager) and Charles Simmons (Manager)		
Coral Marine Services LLC (CMS), located in Amelia, LA, consists of two main operations: tank cleaning and marine vessel maintenance. Tank cleanings are performed on boats, vessels, and barges, with 95 percent of cleanings conducted off site and 5 percent on site, according to Mr. Carpenter. CMS only cleans tanks that store used oil, such as bilges. A degreaser and water are used for cleaning, and one of six 5,000-gallon vacuum trucks is used to remove the oily water, which is transported back to CMS for storage. CMS has 26 storage tanks ranging from 6,000 to 260,000 gallons. Some tanks are designated for used oil storage based on demand, while others are used for water or fuel. Used oil is either recycled or sent to Clean Harbors in White Castle for disposal. Mr. Carpenter stated that used oil is never stored on site for longer than two weeks. CMS will sometimes collect empty paint cans from vessels, which are sent to the River Birch landfill. CMS also performs maintenance and repairs on marine vessels. The company is registered with the EPA as a Very Small Quantity Generator (VSQG) of hazardous waste, used oil transporter, and used oil transfer facility under EPA ID LAD985206960. After the opening conference, the inspection team observed CMS’s used oil storage operations. All of the used oil storage tanks were in a tank farm with a secondary containment surrounding the unit. At the time of the inspection, there were only three 20,000-gallon frac tanks storing used oil. The other tanks were either empty, storing water, or storing fuel. Frack tank #3 was ¾ full, frack tank #4 was ¾ full, and frack tank #5 was full; none were labeled as used oil tanks (see Appendix 1 – Photos 1 to 4) [AOC#1 – CMS did not clearly label aboveground tanks used to store used oil with the words “Used Oil” - 40 CFR 279.45(g)(1)]. The inspection team did not observe other AOCs at the time of the inspection. However, further EPA review may change or add to the list of potential AOCs. A closing conference was conducted at approximately 2:30 PM with CMS personnel. The AOCs were communicated during the closing. Following the inspection on 3/26/2025, Mr. Carpenter sent a follow-up email, including photos of any tanks currently or may store used oil properly labeled (see 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.

Facility: Coral Marine Services LLC		
AOC #1 – CMS did not clearly label aboveground tanks used to store used oil with the words “Used Oil.”	Citation: 40 CFR 279.45(g)(1)	Section: 2.1

SECTION V – 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. 3/26/25 CMS email – Mr. Carpenter provided the inspection team with photos of the used oil tanks properly labeled.

SECTION VI – LIST OF APPENDICES

Appendix 1. Photograph Log

Appendix 2. Photos from CMS 3/26 Response

APPENDIX 1.
PHOTOGRAPH LOG



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Location: Coral Marine Services LLC		
City: Amelia	County/Parish: St. Mary	State: Louisiana



Photo No. 1

Photo File Name: DSCN7709

Date of Photo: 3/24/2025

Time of Photo: 1416 hrs.

Photographer: Vince Damiano

Description: View of a $\frac{3}{4}$ full frack tank (#3) storing used oil in the CMS tank farm that was not labeled as used oil.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Location: Coral Marine Services LLC		
City: Amelia	County/Parish: St. Mary	State: Louisiana



Photo No. 2

Photo File Name: DSCN7710

Date of Photo: 3/24/2025

Time of Photo: 1417 hrs.

Photographer: Vince Damiano

Description: View of a $\frac{3}{4}$ full frac tank (#4) and a full frac tank (#5) storing used oil in the CMS tank farm that were not labeled as used oil.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Location: Coral Marine Services LLC		
City: Amelia	County/Parish: St. Mary	State: Louisiana



Photo No. 3

Photo File Name: DSCN7711

Date of Photo: 3/24/2025

Time of Photo: 1417 hrs.

Photographer: Vince Damiano

Description: View of a $\frac{3}{4}$ full frack tank (#4) storing used oil in the CMS tank farm that was not labeled as used oil.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Location: Coral Marine Services LLC		
City: Amelia	County/Parish: St. Mary	State: Louisiana



Photo No. 4

Photo File Name: DSCN7712

Date of Photo: 3/24/2025

Time of Photo: 1417 hrs.

Photographer: Vince Damiano

Description: View of a $\frac{3}{4}$ full frack tank (#3) storing used oil in the CMS tank farm that was not labeled as used oil.

APPENDIX 2. PHOTOS FROM CMS 3/26 RESPONSE

RE: Follow-up from EPA Inspection on 3/24/25

From scarpenter@coralmarineservices.net <scarpenter@coralmarineservices.net>

Date Wed 3/26/2025 11:10 AM

To Vince Damiano <Vince.Damiano@erg.com>

Cc Janosh Wolters <janosh.wolters@erg.com>; 'Young-Dahl, Erin' <YoungDahl.Erin@epa.gov>; 'Penland, John' <Penland.John@epa.gov>; Jackie Cheramie <jcheramie@coralmarineservices.net>

 7 attachments (12 MB)

IMG_20250326_093417 (1).heic; IMG_20250326_093417 (2).heic; IMG_20250326_093417 (3).heic; IMG_20250326_093417 (4).heic; IMG_20250326_093417 (5).heic; IMG_20250326_093417.heic; IMG_20250326_093418.heic;

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

Vince,

Please find attached photos showing that all the tankage that is/ or may be used for “Used Oil” have been labeled as such.

We have magnetic signs that will be put in use for the future, they should be in next week.

We do not have a MARPOL COA

Regards,

Sean Carpenter

General Manager

Coral Marine Services, LLC

(C) 985-312-6444

scarpenter@coralmarineservices.net

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

Sent: Monday, March 24, 2025 4:55 PM

To: scarpenter@coralmarineservices.net

Cc: Janosh Wolters <janosh.wolters@erg.com>; Young-Dahl, Erin <YoungDahl.Erin@epa.gov>; Penland, John <Penland.John@epa.gov>

Subject: Follow-up from EPA Inspection on 3/24/25

Hello Sean,

I am following up with a list of items and notes from our inspection today. Below are initial Areas of Concern and items requested; you may follow up with pictures, write-ups, sample results, or however you see fit:

- Unlabeled used oil frac tanks
- If applicable, a copy of your MARPOL COA

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.















