

INSPECTION REPORT

Inspection Entry Date/Time	04/15/2024 10:00 (CT)			Announced: No
Inspection Exit Date/Time	04/15/2024 11:10 (CT)			Access: Granted
Regulatory Program	RCRA			
Type of Inspection	Focused Compliance Inspection (FCI)			
Facility or Site Name	Logistec Terminals			
Facility/Site Identifier	N/A			
Facility/Site Physical Address	150 Marine St Bldg 200 C			
City, State, Zip Code	Lake Charles, LA 70601			
County/Borough	Calcasieu Parish			
Generator Status	None			
NAICS	N/A			
Type of Operation	Logistec Terminals unloads cargo including lumber and rice from vessels.			
Geographic Coordinates	30.217528, -93.251604			
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
Logistec Terminals	04/15/24	Logistec Terminals (Logistec) unloads materials including lumber and rice from vessels. They do not load or unload any hazardous waste or waste in general. They mostly generate waste such as dunnage and general trash, used oil, used oil filters, and bilge water in their mechanic shop. They do not have their own MARPOL COA, as it is handled by the Port of Lake Charles (POLC)	Yes

SECTION II – OBSERVATIONS

Tenant: Logistec Terminals			
Section: 2.1	Date: 04/15/24, 10:00 AM	Contains AOC: Yes	Contains CBI: No
Lead Inspector: Cameron Tanaka	Attendees: Jeffery Swan (Terminal Superintendent)		
Logistec is located on City Docks, which is owned by POLC. Logistec unloads materials including lumber and rice from vessels. They do not load or unload any hazardous waste or waste in general. They primarily generate waste such as dunnage and general trash, which are disposed of in the port's dumpsters. They also generate used oil, used oil filters, and oily water in their mechanic shop. Their used oil is generated through maintenance on their forklifts and the oily water is generated from their mechanics power washing their forklifts. These materials are held in plastic totes and are all taken off-site by a third-party transporter. According to Mr. Swan, their used oil, bilge water, and used oil filter containers are filled up then shipped off about once per year. They also generate used batteries which are sent back to the battery manufacturer. Logistec does not have a MARPOL COA from the USCG as the POLC holds the COA that covers the whole port. They also do not have an EPA ID number. During the inspection, the inspection team visually inspected Logistec's maintenance warehouse where used oil and other wastes are stored. The inspection team viewed Logistec's used oil filter drum (see Appendix 1 – Photo 1). The inspection team also viewed the facility's used oil and bilge water totes (see Appendix 1 – Photo 2). The inspection team viewed one of their used oil filter containers without secondary containment (see Appendix 1 – Photo 3). In a follow-up email from Mr. Swan (see Appendix 2), a photo was provided showing that secondary containment was added to this used oil filter drum (see Appendix 3 – Photo 1). The inspection team noted that their used batteries were not dated and labeled as "bad" rather than as "used batteries" (see Appendix 1 – Photos 4 and 5) [AOC #1 – Logistec 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 – Logistec 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)]. Logistec personnel immediately added labels to their batteries (see Appendix 1 – Photo 6). In a follow-up email from Mr. Swan (see Appendix 2), a photo was provided showing that these labels and dates were added to all of these batteries (see Appendix 3– Photo 2). The inspection team did not observe any other AOCs at the time of the inspection. A closing conference was conducted at approximately 11:00 AM with Mr. Swan. The inspection team departed at 11:10 AM.			

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: Logistec Terminals		
AOC #1 – Logistec 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: 2.2
AOC #2 – Logistec 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 2.2

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. 05/28/24 Logistec email – Jeffery Swan sent an email with photographs of corrective actions implemented at the site.

SECTION VI – LIST OF APPENDICES

Appendix 1. Photograph Log

Appendix 2. Follow-Up Email from Logistec Terminals

Appendix 3. Follow-Up Photographs from Logistec Terminals

APPENDIX 1.
PHOTOGRAPH LOG



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Photograph Log

Photo No. 1

Location: Logistec Terminals		
City: Lake Charles	County/Parish: Calcasieu	State: Louisiana



Photo File Name: DSCN7167

Date of Photo: 04/15/2024

Time of Photo: 10:34 hrs.

Photographer: Anshul Paripati

Description: View of Logistec's used oil filter drum in their maintenance shop.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Photograph Log

Photo No. 2

Location: Logistec Terminals		
City: Lake Charles	County/Parish: Calcasieu	State: Louisiana



Photo File Name: DSCN7168

Date of Photo: 04/15/2024

Time of Photo: 10:35 hrs.

Photographer: Anshul Paripati

Description: View of Logistec's used oil and oily water totes in their maintenance shop.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Photograph Log

Photo No. 3

Location: Logistec Terminals		
City: Lake Charles	County/Parish: Calcasieu	State: Louisiana



Photo File Name: DSCN7169

Date of Photo: 04/15/2024

Time of Photo: 10:36 hrs.

Photographer: Anshul Paripati

Description: View of Logistec's used oil filter drum without secondary containment in their maintenance shop.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Photograph Log

Photo No. 4

Location: Logistec Terminals		
City: Lake Charles	County/Parish: Calcasieu	State: Louisiana



Photo File Name: DSCN7170

Date of Photo: 04/15/2024

Time of Photo: 10:43 hrs.

Photographer: Anshul Paripati

Description: View of Logistec's used batteries labeled as "bad" in their maintenance shop.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Photograph Log

Photo No. 5

Location: Logistec Terminals		
City: Lake Charles	County/Parish: Calcasieu	State: Louisiana



Photo File Name: DSCN7171

Date of Photo: 04/15/2024

Time of Photo: 10:47 hrs.

Photographer: Anshul Paripati

Description: Another view of Logistec's used batteries labeled "bad" in their maintenance shop.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Photograph Log

Photo No. 6

Location: Logistec Terminals		
City: Lake Charles	County/Parish: Calcasieu	State: Louisiana



Photo File Name: DSCN7172

Date of Photo: 04/15/2024

Time of Photo: 10:54 hrs.

Photographer: Anshul Paripati

Description: View of Logistec's used batteries with added dates in their maintenance shop.

APPENDIX 2.
FOLLOW-UP EMAIL FROM LOGISTEC TERMINALS

RE: Follow-Up from EPA Inspection 4/15 (Logistec Terminals)

Jeffery Swan <jswan@logistec.com>

Tue 2024-05-28 5:18 PM

To: Cameron Tanaka <Cameron.Tanaka@erg.com>; Britton Miller <bmillier@logistec.com>; Joseph Thornton <jthornton@logistec.com>; Rodger Ballard <rballard@logistec.com>; Edward Frampton <eframpton@logistec.com>; opslc@logistec.com <opslc@logistec.com>
Cc: Anshul Paripati <Anshul.Paripati@erg.com>; Joe Watson <Joe.Watson@erg.com>; Pham, Elizabeth <Pham.Elizabeth@epa.gov>; Ramrakha, Jayshika <Ramrakha.Jayshika@epa.gov>; Pandak, Debra (she/her/hers) <Pandak.Debra@epa.gov>; Thapa, Sandesh <Thapa.Sandesh@epa.gov>

📎 2 attachments (285 KB)

EPA 1.jpg; EPA 2.jpg;

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

Cam,

I apologize for not sending the pictures sooner I was thinking I did send them. If you need anything else please let me know.

Respectfully.

Jeffery Swan

Terminal Superintendent

T 337.433.3362

M 337.693.8679

Logistec Terminals Inc.

150 Marine St., Building 200, Suite C

Lake Charles, LA 70601

www.logistec.com

PROUD TO BE RECOGNIZED AS

LOGISTEC



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

Sent: Tuesday, May 28, 2024 3:39 PM

To: Jeffery Swan <jswan@logistec.com>; Britton Miller <bmillier@logistec.com>; Joseph Thornton <jthornton@logistec.com>; Rodger Ballard <rballard@logistec.com>; Edward Frampton <eframpton@logistec.com>; opslc@logistec.com

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

Subject: Re: Follow-Up from EPA Inspection 4/15 (Logistec Terminals)

Some people who received this message don't often get email from cameron.tanaka@erg.com. [Learn why this is important](#)

External Email: Use caution when opening links and attachments / **Courriel externe:** Soyez prudent avec les liens et documents joints

Hi Jeffery,

Just wanted to check in on this and see if you all had a chance to take pictures of these items.

Best,
Cam

From: Jeffery Swan <jswan@logistec.com>
Sent: Tuesday, April 16, 2024 7:54 AM
To: Cameron Tanaka <Cameron.Tanaka@erg.com>; Britton Miller <bmiller@logistec.com>; Joseph Thornton <jthornton@logistec.com>; Rodger Ballard <rballard@logistec.com>; Edward Frampton <eframpton@logistec.com>; opslc@logistec.com <opslc@logistec.com>
Cc: Anshul Paripati <Anshul.Paripati@erg.com>; Joe Watson <Joe.Watson@erg.com>; Pham, Elizabeth <Pham.Elizabeth@epa.gov>; Ramrakha, Jayshika <Ramrakha.Jayshika@epa.gov>; Pandak, Debra (she/her/hers) <Pandak.Debra@epa.gov>; Thapa, Sandesh <Thapa.Sandesh@epa.gov>
Subject: RE: Follow-Up from EPA Inspection 4/15 (Logistec Terminals)

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

Good morning Cameron,

We will be getting the secondary containment this week for the used oil filter drum as we discussed yesterday on your visit. As for the used dead batteries we will change the wording as per the regulations. When both items are corrected, I will send pictures of both items to you so you can document that we Logistec Terminals LC has complied with the EPA regulations.

Respectfully.

Jeffery Swan

Terminal Superintendent
T 337.433.3362
M 337.693.8679

Logistec Terminals Inc.

150 Marine St., Building 200, Suite C
Lake Charles, LA 70601

www.logistec.com

PROUD TO BE RECOGNIZED AS



From: Cameron Tanaka <Cameron.Tanaka@erg.com>
Sent: Monday, April 15, 2024 11:08 PM
To: Jeffery Swan <jswan@logistec.com>
Cc: Anshul Paripati <Anshul.Paripati@erg.com>; Joe Watson <Joe.Watson@erg.com>; Pham, Elizabeth <Pham.Elizabeth@epa.gov>; Ramrakha, Jayshika <Ramrakha.Jayshika@epa.gov>; Pandak, Debra (she/her/hers) <Pandak.Debra@epa.gov>; Thapa, Sandesh <Thapa.Sandesh@epa.gov>
Subject: Follow-Up from EPA Inspection 4/15 (Logistec Terminals)

You don't often get email from cameron.tanaka@erg.com. [Learn why this is important](#)

Hi Jeffery,

I am following up with a list of items and notes from our inspection today. 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).

- I mentioned that your used oil filter drum needed secondary containment, but this appears to only be for transfer facilities. You all do not need to add secondary containment from what I understand, but this would be a best practice.
- Used batteries were not correctly labelled and dated. This one seems to apply to you. We have documentation that you added the dates on them. However, they were labelled as "Bad" and looking into the regulations they have to be labelled as "Universal Waste-Battery(ies)," "Waste Battery(ies)," or "Used Battery(ies)."

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,
Cam

Cameron Tanaka (he/him)

Eastern Research Group, Inc.

cameron.tanaka@erg.com

Cell: (508) 314-6432

APPENDIX 3.
FOLLOW-UP PHOTOGRAPHS FROM LOGISTEC TERMINALS



