

Region 6 Compliance Assurance and Enforcement Division
INSPECTION REPORT

Inspection Date(s):	05/18/2023		
Media:	Water		
Regulatory Program(s)	Clean Water Act		
Company Name:	Main Iron Works		
Facility Name:	Main Iron Works		
Facility Physical Location:	148 Old Ferry Rd @ Bayou Blue Rd HWY 316		
(city, state, zip code)	Houma, LA 70363		
Mailing address:	P.O. Box 1106		
(city, state, zip code)	Houma, LA 70361		
County/Parish:	Terrebonne		
Facility Contact:	Drew Clements	Environmental Consultant/Authorized Rep.	
	daclem@charter.net		
FRS Number:			
Identification/Permit Number:	LA0104868		
Media Number:			
NAICS:			
SIC:	3731		
Personnel participating in inspection:			
Michael Williams	EPA/ 6EN-WMH	Inspector	281-983-2150
Lloyd Guidry	Main Iron Works	Manager	985-876-6302
Tim Moore	Main Iron Works	Safety Manager	
EPA Lead Inspector Signature/Date	 Digitally signed by MICHAEL WILLIAMS Date: 2023.07.31 10:50:33 -05'00'		Date
	Michael D. Williams		Date
Supervisor Signature/Date	ROBERTO BERNIER Digitally signed by ROBERTO BERNIER Date: 2023.08.02 08:18:42 -05'00'		Date
	Roberto Bernier		Date

Section I - Introduction

PURPOSE OF THE INSPECTION

EPA Region 6 inspector, Michael Williams, arrived at the Main Iron Works at 10:56 am on May 18, 2023, for an unannounced NPDES wastewater treatment inspection. During the opening conference, I met with Lloyd Guidry, Plant Manager. Mr. Guidry was informed that this was an EPA lead compliance evaluation inspection to determine compliance with the facility's National Pollutant Discharge Elimination System (NPDES) permit and the Clean Water Act. The scope of the inspection was with permit LA0104868, facility operations, and maintenance under the Clean Water Act. The inspection was conducted under the authority of the NPDES permit program, in accordance with the Federal CWA.

The information presented in this report is based on the materials and information supplied by the Main Iron Works representatives, observations made during the inspection, and records and reports maintained by the permittee.

FACILITY DESCRIPTION

Main Iron Works, situated at the intersection of 148 Old Ferry Rd and Bayou Blue Rd HWY 316 in picturesque Houma, Louisiana, is a renowned shipyard facility. This establishment specializes in shipbuilding and repair, as well as barge construction and maintenance.

The facility boasts a comprehensive array of capabilities, encompassing both land-based and dry dock operations. From precision cutting and welding to meticulous sandblasting and painting, Main Iron Works ensures the highest standards of craftsmanship in all its endeavors.

During its operations, the facility generates wastewater from four distinct sanitary treatment package plants, alongside three points for stormwater discharge, and one point for ballast water discharge. Discharge from each is sampled prior to commingling with receiving waters Bayou Blue and the Intracoastal Waterway. The facility has permitted two additional package plants for future expansion.

Section II- Observations

This inspection revealed the following observations:

The sanitary treatment package plants at Main Iron Works offer basic treatment capabilities, but their size imposes constraints on solid inventory capacity. To handle the disposal of solids, the facility has enlisted the services of a septic hauler, responsible for pumping down the tanks in these package plants.

Unfortunately, between September 2022 and March 2023, the facility experienced multiple effluent violations stemming from the package plants. The main contributing factor to these violations was the challenge of effectively managing the solids inventory within the treatment system. Efforts to address and improve this aspect are underway to rectify the situation and prevent future violations.

The facility site and grounds were in good order because of their housekeeping. The site practices minimized containment from the shipbuilding and repair activity.

Section III- Areas of Concern

This inspection revealed the following areas of concern:

With the plant's current design, the facility will need to monitor and pump down the solid inventory to prevent permit exceedance.

When permit limits are exceeded, the number of exceedances for the monitoring period is required to be reported in their discharge monitoring report. The facility monitors once a quarter of 1/90 days. Each result that exceeds that limitation value should be reported in the “# of EX.” column on the discharge monitoring report.

Section IV – LIST OF APPENDICES

- Appendix 1 – Photo Log