

INSPECTION REPORT

Inspection Entry Date/Time	3/25/2025 15:10 (CT) 3/26/2025 13:00 (CT)		Announced: No
Inspection Exit Date/Time	3/26/2025 14:15 (CT)		Access: Granted
Regulatory Program	RCRA		
Type of Inspection	Compliance Evaluation Inspection (CEI)		
Facility or Site Name	National Marine Environmental LLC		
Facility/Site Identifier	N/A		
Facility/Site Physical Address	1010 Jackson Rd. (Office)		
City, State, Zip Code	Amelia, LA 70380		
County/Borough	St. Mary		
Generator Status	Non-generator		
NAICS	48411		
Type of Operation	National Marine Environmental LLC (NME) collects used oil from customers and stores it before sending it to be recycled.		
Geographic Coordinates	29.6642, -91.1239		
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	Vincen Damiano		Digitally signed by Vincen Damiano Date: 2025.05.01 16:35:03 -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
NME/Operations	Bubba Nini	bubba.nationalcompanies@gmail.com	Yes	Yes

Facility General Description

Tenant/Area	Inspection Date	Process Description	Area of Concern
National Marine Environmental LLC	3/26/25	NME handles customers' used oil and stores it before sending it for recycling. NME is land-based and does not operate under a MARPOL COA.	Yes

SECTION II – OBSERVATIONS

Facility: National Marine Environmental LLC			
Section: 2.1	Date: 3/26/25, 1:00 PM	Contains AOC: Yes	Contains CBI: No
Lead Inspector: Vince Damiano	Attendees: Bubba Nini (Manager)		
National Marine Environmental LLC (NME), located in Morgan City, LA, operates as a used oil transporter and transfer facility. NME has two vacuum trucks used to collect waste oil, bilge water, and used oil from customers before bringing it back to the facility for storage. The used oil is consolidated into tanks at NME and then transported to one of the following facilities for disposal: Plaquemines Processing & Recovery LLC in Belle Chasse, LA; Clean Harbors in White Castle, LA; or Mikes Filters in Houma, LA. NME has five storage frac tanks, each with a capacity of 20,000 gallons. NME is not registered with the EPA as a used oil transporter nor a used oil transfer facility. The inspection team originally arrived at NME’s waste consolidation facility, 958 Lake Palourde Road, Morgan City, LA, to conduct the unannounced inspection on 3/25/2025 at 3:10 PM, but there were no relevant staff present to conduct the inspection. Inspector Penland was able to reach Mr. Nini by telephone and spoke with Mr. Nini for general facility information and to reschedule the inspection for the following day. Mr. Nini granted access to the inspection team to observe the waste consolidation facilities while on-site on 3/25; photos from the observation can be found in Appendix 1. After photographing the storage tanks, the inspection team departed. The inspection team arrived at the office location on 3/26/2025 at approximately 1:00 PM to continue the inspection. After the opening conference, the inspection team discussed NME’s used oil storage operations. The inspection team asked Mr. Nini if NME has an EPA ID number. Mr. Nini stated that NME had not applied for an EPA ID number [AOC #1 – <i>Used Oil Transporters who have not previously complied with the notification requirements of RCRA section 3010 must comply with these requirements and obtain an EPA identification number” – 40 CFR 279.42 (a)</i>]. The inspection team observed three 55-gallon containers approximately ¾ full during the visual inspection of the waste consolidation facility (see Appendix 1 – Photos 4 and 8). Mr. Nini stated that the 55-gallon containers observed are used to store residuals from the vacuum trucks. The inspection team asked Mr. Nini if he had knowledge of the material in NME’s storage tanks and the containers observed at the waste consolidation facility. At the time of the inspection, Mr. Nini stated that Tank 0 held 3,000 gallons of oily water waste; Tank 1 held 4,000 gallons of oily water waste; Tank 2 held 8,300 gallons of used oil; Tank 3 was empty; and Tank 4 held 20,000 gallons of contaminated oily water with diesel fuel. The inspection team explained to Mr. Nini that the 55-gallon containers, Tanks 0, 1, 2, and 4 were not labeled to indicate their used oil contents (see Appendix 1- Photos 4 to 7) [AOC #2 – <i>NME did not clearly label containers used to store used oil with the words “Used Oil” - 40 CFR 279.45(g)(1)</i>]]. The inspection team also mentioned that the used oil 55-gallon containers must be stored in secondary containment as a used oil			

transfer facility. The 55-gallon containers observed during the visual inspection were not stored in secondary containment [**AOC#3** – NME stored used oil as a transfer facility without a secondary containment system - 40 CFR 279.45(d)]. The inspection team also observed a roll-off container, which Mr. Nini stated was storing non-hazardous mud from a cleaning (see Appendix 1 – Photo 7).

All AOCs observed by the inspection team at the time of the inspection are documented above. However, upon further review, EPA may change or add additional AOCs. A closing conference was conducted at approximately 2:15 PM with Mr. Nini. The AOCs observed throughout the visual inspection were communicated during the closing conference. Following the inspection on 3/27/2025 and 4/10/2025, Mr. Nini sent follow-up emails in response to the AOCs observed during the inspection including:

- Waste profile from the roll-off container found at the consolidation facility (Appendix 2)
- Waste profile from frac tank 4 (Appendix 3)
- NME response letter to the AOCs observed from 4/10/2025 (Appendix 4)
- Photos of used oil tanks and containers labeled as well as secondary containment implemented (Appendix 5).

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: National Marine Environmental LLC		
AOC #1 – Used Oil Transporters who have not previously complied with the notification requirements of RCRA section 3010 must comply with these requirements and obtain an EPA identification number.	Citation: 40 CFR 279.42 (a)	Section: 2.1
AOC #2 – NME did not clearly label containers used to store used oil with the words “Used Oil”	Citation: 40 CFR 279.22(c)	Section: 2.1
AOC #3 – NME stored used oil as a transfer facility without a secondary containment system.	Citation: 40 CFR 279.45(d)	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. 3/27/25 NME email – Mr. Nini provided the inspection team with waste profiles for the Frac Tank 4 and non-hazardous roll-off container.
2. 4/10/25 NME email – Mr. Nini provided the inspection team with photos of the secondary containment system installed, used oil labels, and an update on obtaining an EPA ID

SECTION VI – LIST OF APPENDICES

Appendix 1. Photograph Log

Appendix 2. NME Response on 3/27/2025 and Roll-off Waste Profile

Appendix 3. Frac Tank 4 Waste Profile

Appendix 4. NME Response Letter on 4/10/2025

Appendix 5. Photos from NME Response on 4/10/2025

APPENDIX 1.
PHOTOGRAPH LOG



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Location: National Marine Environmental LLC		
City: Morgan City	County/Parish: St. Mary	State: Louisiana



Photo No. 1

Photo File Name: WIN_20250325_15_26_46_Pro

Date of Photo: 3/25/2025

Time of Photo: 15:26 hrs.

Photographer: John Penland

Description: Overview of NME's used oil consolidation facility.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Location: National Marine Environmental LLC		
City: Morgan City	County/Parish: St. Mary	State: Louisiana



Photo No. 2

Photo File Name: WIN_20250325_15_27_06_Pro

Date of Photo: 3/25/2025

Time of Photo: 15:27 hrs.

Photographer: John Penland

Description: Overview of NME's used oil consolidation facility with empty totes and empty 55-gallon drums in the background.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Location: National Marine Environmental LLC		
City: Morgan City	County/Parish: St. Mary	State: Louisiana



Photo No. 3

Photo File Name: WIN_20250325_15_27_26_Pro

Date of Photo: 3/25/2025

Time of Photo: 15:27 hrs.

Photographer: John Penland

Description: View of empty totes and 55-gallon drums at the used oil consolidation facility.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Location: National Marine Environmental LLC		
City: Morgan City	County/Parish: St. Mary	State: Louisiana



Photo No. 4

Photo File Name: WIN_20250325_15_27_54_Pro

Date of Photo: 3/25/2025

Time of Photo: 15:27 hrs.

Photographer: John Penland

Description: Overview of NME's used oil frac tanks in secondary containment at the used oil consolidation facility and a view of one of the 55-gallon drums storing used oil which was not labeled.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Location: National Marine Environmental LLC		
City: Morgan City	County/Parish: St. Mary	State: Louisiana



Photo No. 5

Photo File Name: WIN_20250325_15_28_16_Pro

Date of Photo: 3/25/2025

Time of Photo: 15:28 hrs.

Photographer: John Penland

Description: View of frac tank 0 (right) and frac tank 1 (left). Frac tank 0 was storing water, and frac tank 1 was storing 4,000 gallons of oily water; the frac tank was not labeled as used oil.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Location: National Marine Environmental LLC		
City: Morgan City	County/Parish: St. Mary	State: Louisiana



Photo No. 6

Photo File Name: WIN_20250325_15_28_19_Pro

Date of Photo: 3/25/2025

Time of Photo: 15:28 hrs.

Photographer: John Penland

Description: View of frac tank 2 (right), frac tank 3 (middle), and frac tank 4 (left). Frac tank 2 was storing 8,300 gallons of used oil (not labeled), frac tank 3 was empty, and frac tank 4 was storing 20,000 gallons of oily water/diesel; the frac tank was not labeled as used oil.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Location: National Marine Environmental LLC		
City: Morgan City	County/Parish: St. Mary	State: Louisiana



Photo No. 7

Photo File Name: WIN_20250325_15_28_30_Pro

Date of Photo: 3/25/2025

Time of Photo: 15:28 hrs.

Photographer: John Penland

Description: View of the roll-off container that was storing non-hazardous mud.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Location: National Marine Environmental LLC		
City: Morgan City	County/Parish: St. Mary	State: Louisiana



Photo No. 8

Photo File Name: WIN_20250325_15_28_42_Pro

Date of Photo: 3/25/2025

Time of Photo: 15:28 hrs.

Photographer: John Penland

Description: View of two $\frac{3}{4}$ full 55-gallon drums of used oil that were not labeled.

APPENDIX 2. NME RESPONSE ON 3/27/2025 AND ROLL-OFF WASTE PROFILE

Re: Follow-up from EPA Inspection on 3/26/2025

From Bubba <bubba.nationalcompanies@gmail.com>

Date Thu 3/27/2025 9:18 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>

 2 attachments (468 KB)

Roll Top Profile.pdf; Tank Profile.pdf;

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

Hey, GM , guys, it's never enjoyable to go through an inspection, but I will commend each of you on your

professional approach and understanding , you made the process bearable, Thanks

I will send pictures soon of the totes and drums in containment, also Used Oil written on tanks until stickers or made. Attached is the profiles that you requested. We will start working on The LA EPA #. I will send follow up emails with updates as I get them, Thanks.

Kind Regards,

Bubba Nini

On Wed, Mar 26, 2025 at 5:30 PM Vince Damiano <Vince.Damiano@erg.com> wrote:

Hello Bubba,

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:

- No EPA ID number as used oil transporter and transfer facility (refer to 40 CFR 279.42)
- Used oil frac tanks were not labeled as "Used Oil"
- No secondary containment for 55-gallon drums of used oil as a transfer facility (refer to 40 CFR 279 Subpart E)

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.

Thanks,

Vince



Vince Damiano

Chemical Engineer, Chantilly Office

Cell: (703) 835-6281

Vince.Damiano@erg.com



WASTE MATERIAL PROFILE SHEET

Clean Harbors Profile No. CH2901234B

A. GENERAL INFORMATION

GENERATOR EPA ID #/REGISTRATION #
GENERATOR CODE (Assigned by Clean Harbors)
ADDRESS **1010 Jackson Road**
CUSTOMER CODE (Assigned by Clean Harbors)
ADDRESS **1010 Jackson Road**

NONHAZTRANSP
NA31190
NA31190

GENERATOR NAME:
CITY **Morgan City**
CUSTOMER NAME:
CITY **Morgan City**

National Marine Environmental
STATE/PROVINCE **LA** ZIP/POSTAL CODE **70380**
PHONE: **(985) 354-6003**
National Marine Environmental
STATE/PROVINCE **LA** ZIP/POSTAL CODE **70380**

B. WASTE DESCRIPTION

WASTE DESCRIPTION: **Tank Bottoms**

PROCESS GENERATING WASTE: **Washing boats and barges Tank Bottoms**

IS THIS WASTE CONTAINED IN SMALL PACKAGING CONTAINED WITHIN A LARGER SHIPPING CONTAINER ? **No**

C. PHYSICAL PROPERTIES (at 25C or 77F)

PHYSICAL STATE SOLID WITHOUT FREE LIQUID POWDER MONOLITHIC SOLID ☒ LIQUID WITH NO SOLIDS ☒ LIQUID/SOLID MIXTURE % FREE LIQUID 5.00 - 10.00 % SETTLED SOLID 90.00 - 95.00 % TOTAL SUSPENDED SOLID SLUDGE GAS/AEROSOL	NUMBER OF PHASES/LAYERS 1 ☒ 2 3 TOP 10.00 % BY VOLUME (Approx.) MIDDLE 0.00 BOTTOM 90.00	VISCOSITY (If liquid present) ☒ 1 - 100 (e.g. Water) 101 - 500 (e.g. Motor Oil) 501 - 10,000 (e.g. Molasses) > 10,000	COLOR Brown/Black
	ODOR NONE ☒ MILD STRONG Describe:	BOILING POINT °F (°C) ≤ 95 (≤35) 95 - 100 (35-38) 101 - 129 (38-54) ☒ ≥ 130 (>54)	MELTING POINT °F (°C) < 140 (<60) 140-200 (60-93) ☒ > 200 (>93)
			TOTAL ORGANIC CARBON (%) ≤ 1 ☒ > 1 - <10 ≥ 10

FLASH POINT °F (°C) < 73 (<23) 73 - 100 (23-38) ☒ 101 - 140 (38-60) 141 - 200 (60-93) ☒ > 200 (>93)	pH ≤ 2 ☒ 2.1 - 6.9 7 (Neutral) 7.1 - 12.4 ≥ 12.5	SPECIFIC GRAVITY < 0.8 (e.g. Gasoline) 0.8-1.0 (e.g. Ethanol) 1.0 (e.g. Water) 1.0-1.2 (e.g. Antifreeze) ☒ > 1.2 (e.g. Methylene Chloride)	ASH < 0.1 0.1 - 1.0 ☒ 1.1 - 5.0 5.1 - 20.0	BTU/LB (MJ/kg) ☒ < 2,000 (<4.6) ≥ 2,000-4,999 (≥4.6-11.62) ≥ 5,000-10,000 (≥11.63-23.2) > 10,000 (>23.2) Actual:
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D. COMPOSITION

(List the complete composition of the waste, include any inert components and/or debris. Ranges for individual components are acceptable. If a trade name is used, please supply an MSDS. Please do not use abbreviations.)

CHEMICAL	MIN	--	MAX	UOM
BARIUM	94.0000000	--	94.0000000	PPM
CALCIUM	2103.0000000	--	2103.0000000	PPM
COPPER	0.6400000	--	0.6400000	PPM
DIRT & MUD	85.0000000	--	90.0000000	%
MAGNESIUM	310.3500000	--	310.3500000	PPM
OIL & GREASE	0.0000000	--	5.0000000	%
SODIUM	6335.0000000	--	6335.0000000	PPM
WATER	5.0000000	--	10.0000000	%
ZINC	3.4600000	--	3.4600000	PPM

DOES THIS WASTE CONTAIN ANY HEAVY GAUGE METAL DEBRIS OR OTHER LARGE OBJECTS (EX., METAL PLATE OR PIPING >1/4" THICK OR >12" LONG, METAL REINFORCED HOSE >12" LONG, METAL WIRE >12" LONG, METAL VALVES, PIPE FITTINGS, CONCRETE REINFORCING BAR OR PIECES OF CONCRETE >3")? YES ☒ NO

If yes, describe, including dimensions:

DOES THIS WASTE CONTAIN ANY METALS IN POWDERED OR OTHER FINELY DIVIDED FORM? YES ☒ NO

DOES THIS WASTE CONTAIN OR HAS IT CONTACTED ANY OF THE FOLLOWING; ANIMAL WASTES, HUMAN BLOOD, BLOOD PRODUCTS, BODY FLUIDS, MICROBIOLOGICAL WASTE, PATHOLOGICAL WASTE, HUMAN OR ANIMAL DERIVED SERUMS OR PROTEINS OR ANY OTHER POTENTIALLY INFECTIOUS MATERIAL? YES ☒ NO

I acknowledge that this waste material is neither infectious nor does it contain any organism known to be a threat to human health. This certification is based on my knowledge of the material. Select the answer below that applies:

The waste was never exposed to potentially infectious material. YES NO

Chemical disinfection or some other form of sterilization has been applied to the waste. YES NO

I ACKNOWLEDGE THAT THIS PROFILE MEETS THE CLEAN HARBORS BATTERY PACKAGING REQUIREMENTS. YES NO

I ACKNOWLEDGE THAT MY FRIABLE ASBESTOS WASTE IS DOUBLE BAGGED AND WETTED. YES NO

SPECIFY THE SOURCE CODE ASSOCIATED WITH THE WASTE. **G13** SPECIFY THE FORM CODE ASSOCIATED WITH THE WASTE. **W609**

E. CONSTITUENTS

Are these values based on testing or knowledge? ☒ Knowledge ☐ Testing

If based on knowledge, please describe in detail, the rationale applied to identify and characterize the waste material. Please include reference to Material Safety Data Sheets (MSDS) when applicable. Include the chemical or trade-name represented by the MSDS, and or detailed process or operating procedures which generate the waste.

Process knowledge of washing boats and barges ; sample sent to White Caste

Please indicate which constituents below apply. Concentrations must be entered when applicable to assist in accurate review and expedited approval of your waste profile. Please note that the total regulated metals and other constituents sections require answers.

RCRA	REGULATED METALS	REGULATORY LEVEL (mg/l)	TCLP mg/l	TOTAL	UOM	NOT APPLICABLE
D004	ARSENIC	5.0				☒
D005	BARIUM	100.0				☒
D006	CADMIUM	1.0				☒
D007	CHROMIUM	5.0				☒
D008	LEAD	5.0				☒
D009	MERCURY	0.2				☒
D010	SELENIUM	1.0				☒
D011	SILVER	5.0				☒
VOLATILE COMPOUNDS			OTHER CONSTITUENTS			MAX UOM NOT APPLICABLE
D018	BENZENE	0.5		BROMINE		☒
D019	CARBON TETRACHLORIDE	0.5		CHLORINE		☒
D021	CHLOROBENZENE	100.0		FLUORINE		☒
D022	CHLOROFORM	6.0		IODINE		☒
D028	1,2-DICHLOROETHANE	0.5		SULFUR		☒
D029	1,1-DICHLOROETHYLENE	0.7		POTASSIUM		☒
D035	METHYL ETHYL KETONE	200.0		SODIUM		☒
D039	TETRACHLOROETHYLENE	0.7		AMMONIA		☒
D040	TRICHLOROETHYLENE	0.5		CYANIDE AMENABLE		☒
D043	VINYL CHLORIDE	0.2		CYANIDE REACTIVE		☒
SEMI-VOLATILE COMPOUNDS				CYANIDE TOTAL		☒
D023	o-CRESOL	200.0		SULFIDE REACTIVE		☒
D024	m-CRESOL	200.0				
D025	p-CRESOL	200.0				
D026	CRESOL (TOTAL)	200.0				
D027	1,4-DICHLOROBENZENE	7.5				
D030	2,4-DINITROTOLUENE	0.13				
D032	HEXACHLOROBENZENE	0.13				
D033	HEXACHLOROBUTADIENE	0.5				
D034	HEXACHLOROETHANE	3.0				
D036	NITROBENZENE	2.0				
D037	PENTACHLOROPHENOL	100.0				
D038	PYRIDINE	5.0				
D041	2,4,5-TRICHLOROPHENOL	400.0				
D042	2,4,6-TRICHLOROPHENOL	2.0				
PESTICIDES AND HERBICIDES						
D012	ENDRIN	0.02				
D013	LINDANE	0.4				
D014	METHOXYCHLOR	10.0				
D015	TOXAPHENE	0.5				
D016	2,4-D	10.0				
D017	2,4,5-TP (SILVEX)	1.0				
D020	CHLORDANE	0.03				
D031	HEPTACHLOR (AND ITS EPOXIDE)	0.008				

HOCs
☒ NONE
< 1000 PPM
≥ 1000 PPM

PCBs
☒ NONE
< 50 PPM
≥ 50 PPM

IF PCBs ARE PRESENT, IS THE WASTE REGULATED BY TSCA 40 CFR 761?

YES☒ NO

ADDITIONAL HAZARDS

DOES THIS WASTE HAVE ANY UNDISCLOSED HAZARDS OR PRIOR INCIDENTS ASSOCIATED WITH IT, WHICH COULD AFFECT THE WAY IT SHOULD BE HANDLED?

YES ☒ NO (If yes, explain)

CHOOSE ALL THAT APPLY

DEA REGULATED SUBSTANCES

EXPLOSIVE

FUMING

OSHA REGULATED CARCINOGENS



POLYMERIZABLE

RADIOACTIVE

REACTIVE MATERIAL



NONE OF THE ABOVE



F. REGULATORY STATUS

YES	☒	NO	USEPA HAZARDOUS WASTE?	
YES	☒	NO	DO ANY STATE WASTE CODES APPLY?	
			Texas Waste Code	
YES	☒	NO	DO ANY CANADIAN PROVINCIAL WASTE CODES APPLY?	
YES	☒	NO	IS THIS WASTE PROHIBITED FROM LAND DISPOSAL WITHOUT FURTHER TREATMENT PER 40 CFR PART 268?	
			LDR CATEGORY:	Not subject to LDR
			VARIANCE INFO:	
YES	☒	NO	IS THIS A UNIVERSAL WASTE?	
YES	☒	NO	IS THE GENERATOR OF THE WASTE CLASSIFIED AS A VERY SMALL QUANTITY GENERATOR (VSQG) OR A STATE EQUIVALENT DESIGNATION?	
YES		NO	IS THIS MATERIAL GOING TO BE MANAGED AS A RCRA EXEMPT COMMERCIAL PRODUCT, WHICH IS FUEL (40 CFR 261.2 (C)(2)(II))?	
YES	☒	NO	DOES TREATMENT OF THIS WASTE GENERATE A F006 OR F019 SLUDGE?	
YES		NO	IS THIS WASTE STREAM PROHIBITED FROM INCINERATION BASED ON THE INORGANIC METAL BEARING WASTE PROHIBITION FOUND AT 40 CFR 268.3(C)?	
YES	☒	NO	IS THIS WASTE STREAM "USED OIL" WHICH IS TO BE MANAGED UNDER 40 CFR PART 279 - STANDARDS FOR THE MANAGEMENT OF USED OIL?	
YES	☒	NO	DOES THIS WASTE CONTAIN VOC'S IN CONCENTRATIONS >=500 PPM?	
YES		NO	DOES THE WASTE CONTAIN GREATER THAN 20% OF ORGANIC CONSTITUENTS WITH A VAPOR PRESSURE >= .3KPA (.044 PSIA)?	
YES	☒	NO	DOES THIS WASTE CONTAIN AN ORGANIC CONSTITUENT WHICH IN ITS PURE FORM HAS A VAPOR PRESSURE > 76.6 KPA (11.1 PSIA)?	
YES	☒	NO	IS THIS CERCLA REGULATED (SUPERFUND) WASTE ?	
YES	☒	NO	IS THE WASTE SUBJECT TO ONE OF THE FOLLOWING NESHAP RULES?	
			Hazardous Organic NESHAP (HON) rule (subpart G)	Pharmaceuticals production (subpart GGG)
YES		NO	IF THIS IS A US EPA HAZARDOUS WASTE, DOES THIS WASTE STREAM CONTAIN BENZENE?	
YES		NO	Does the waste stream come from a facility with one of the SIC codes listed under benzene NESHAP or is this waste regulated under the benzene NESHAP rules because the original source of the waste is from a chemical manufacturing, coke by-product recovery, or petroleum refinery process?	
YES		NO	Is the generating source of this waste stream a facility with Total Annual Benzene (TAB) >10 Mg/year?	
			What is the TAB quantity for your facility?	
				Megagram/year (1 Mg = 2,200 lbs)
			The basis for this determination is: Knowledge of the Waste Or Test Data	Knowledge Testing
			Describe the knowledge :	

G. DOT/TDG INFORMATION

DOT/TDG PROPER SHIPPING NAME:

NON DOT REGULATED MATERIAL, (TANK BOTTOM)

H. TRANSPORTATION REQUIREMENTS

ESTIMATED SHIPMENT FREQUENCY ☒ ONE TIME WEEKLY MONTHLY QUARTERLY YEARLY OTHER

CONTAINERIZED	☒ BULK LIQUID	BULK SOLID
0-0 CONTAINERS/SHIPMENT		
STORAGE CAPACITY:	GALLONS/SHIPMENT: 2000.00 Min -4000.00 GAL.	SHIPMENT UOM: TON YARD
CONTAINER TYPE:	Max	TONS/YARDS/SHIPMENT: 0 Min - 0 Max
PORTABLE TOTE TANK		
BOX CARTON CASE		
CUBIC YARD BOX		
DRUM		
OTHER:		
DRUM SIZE:		

I. SPECIAL REQUEST

COMMENTS OR REQUESTS:

Approve For WT

GENERATOR'S CERTIFICATION

I certify that I am authorized to execute this document as an authorized agent. I hereby certify that all information submitted in this and attached documents is correct to the best of my knowledge. I also certify that any samples submitted are representative of the actual waste. If Clean Harbors discovers a discrepancy during the approval process, Generator grants Clean Harbors the authority to amend the profile, as Clean Harbors deems necessary, to reflect the discrepancy.

AUTHORIZED SIGNATURE

NAME (PRINT)

TITLE

DATE



Addendum

D. COMPOSITION

Reactive Metals Certification

Waste material will be shipped under a visible layer of mineral oil.

☒ YES NO

Metal containers will be used for shipment.

☒ YES NO

F. REGULATORY STATUS

APPENDIX 3. FRAC TANK 4 WASTE PROFILE



WASTE MATERIAL PROFILE SHEET

Clean Harbors Profile No. CH2803698B

A. GENERAL INFORMATION

GENERATOR EPA ID #/REGISTRATION #
GENERATOR CODE (Assigned by Clean Harbors)
ADDRESS **1010 Jackson Road**
CUSTOMER CODE (Assigned by Clean Harbors)
ADDRESS **1010 Jackson Road**

PENDING

NA31190

GENERATOR NAME:
CITY **Morgan City**

National Marine Environmental

STATE/PROVINCE **LA** ZIP/POSTAL CODE **70380**

PHONE:

National Marine Environmental

STATE/PROVINCE **LA** ZIP/POSTAL CODE **70380**

B. WASTE DESCRIPTION

WASTE DESCRIPTION: **Oily Wastewater**

PROCESS GENERATING WASTE: **Washing boats and barges**

IS THIS WASTE CONTAINED IN SMALL PACKAGING CONTAINED WITHIN A LARGER SHIPPING CONTAINER ? **No**

C. PHYSICAL PROPERTIES (at 25C or 77F)

PHYSICAL STATE SOLID WITHOUT FREE LIQUID POWDER MONOLITHIC SOLID ☒ LIQUID WITH NO SOLIDS ☒ LIQUID/SOLID MIXTURE % FREE LIQUID 95.00 - 97.00 % SETTLED SOLID 3.00 - 5.00 % TOTAL SUSPENDED SOLID SLUDGE GAS/AEROSOL	NUMBER OF PHASES/LAYERS 1 2 ☒ 3 TOP 1.00 % BY VOLUME (Approx.) MIDDLE 95.00 BOTTOM 4.00 ODOR NONE MILD ☒ STRONG Describe: OILY	BOILING POINT °F (°C) ≤ 95 (≤35) 95 - 100 (35-38) 101 - 129 (38-54) ☒ ≥ 130 (≥54)	VISCOSITY (If liquid present) ☒ 1 - 100 (e.g. Water) 101 - 500 (e.g. Motor Oil) 501 - 10,000 (e.g. Molasses) > 10,000 MELTING POINT °F (°C) ☒ < 140 (<60) 140-200 (60-93) > 200 (>93)	COLOR Brown/Black TOTAL ORGANIC CARBON ☒ ≤ 1% 1-9% ≥ 10%
FLASH POINT °F (°C) < 73 (<23) 73 - 100 (23-38) ☒ 101 - 140 (38-60) 141 - 200 (60-93) ☒ > 200 (>93)	pH ≤ 2 2.1 - 6.9 ☒ 7 (Neutral) 7.1 - 12.4 ≥ 12.5	SPECIFIC GRAVITY < 0.8 (e.g. Gasoline) 0.8-1.0 (e.g. Ethanol) 1.0 (e.g. Water) ☒ 1.0-1.2 (e.g. Antifreeze) > 1.2 (e.g. Methylene Chloride)	ASH < 0.1 0.1 - 1.0 ☒ 1.1 - 5.0 5.1 - 20.0	BTU/LB (MJ/kg) ☒ < 2,000 (<4.6) 2,000-5,000 (4.6-11.6) 5,000-10,000 (11.6-23.2) > 10,000 (>23.2) Actual:

D. COMPOSITION (List the complete composition of the waste, include any inert components and/or debris. Ranges for individual components are acceptable. If a trade name is used, please supply an MSDS. Please do not use abbreviations.)

CHEMICAL	MIN	--	MAX	UOM
BARIUM	1.2600000	--	1.2600000	PPM
CALCIUM	27.6400000	--	27.6400000	PPM
COPPER	0.6400000	--	0.6400000	PPM
DIRT & MUD	3.0000000	--	5.0000000	%
MAGNESIUM	7.0100000	--	7.0100000	PPM
OIL & GREASE	2.0000000	--	5.0000000	%
SODIUM	46.6000000	--	46.6000000	PPM
WATER	90.0000000	--	95.0000000	%
ZINC	11.6900000	--	11.6900000	PPM

DOES THIS WASTE CONTAIN ANY HEAVY GAUGE METAL DEBRIS OR OTHER LARGE OBJECTS (EX., METAL PLATE OR PIPING >1/4" THICK OR >12" LONG, METAL REINFORCED HOSE >12" LONG, METAL WIRE >12" LONG, METAL VALVES, PIPE FITTINGS, CONCRETE REINFORCING BAR OR PIECES OF CONCRETE >3")? YES ☒ NO

If yes, describe, including dimensions:

DOES THIS WASTE CONTAIN ANY METALS IN POWDERED OR OTHER FINELY DIVIDED FORM? YES ☒ NO

DOES THIS WASTE CONTAIN OR HAS IT CONTACTED ANY OF THE FOLLOWING; ANIMAL WASTES, HUMAN BLOOD, BLOOD PRODUCTS, BODY FLUIDS, MICROBIOLOGICAL WASTE, PATHOLOGICAL WASTE, HUMAN OR ANIMAL DERIVED SERUMS OR PROTEINS OR ANY OTHER POTENTIALLY INFECTIOUS MATERIAL? YES ☒ NO

I acknowledge that this waste material is neither infectious nor does it contain any organism known to be a threat to human health. This certification is based on my knowledge of the material. Select the answer below that applies:

The waste was never exposed to potentially infectious material. YES NO

Chemical disinfection or some other form of sterilization has been applied to the waste. YES NO

I ACKNOWLEDGE THAT THIS PROFILE MEETS THE CLEAN HARBORS BATTERY PACKAGING REQUIREMENTS. YES NO

I ACKNOWLEDGE THAT MY FRIABLE ASBESTOS WASTE IS DOUBLE BAGGED AND WETTED. YES NO

SPECIFY THE SOURCE CODE ASSOCIATED WITH THE **G13** SPECIFY THE FORM CODE ASSOCIATED WITH THE WASTE. **W609**

E. CONSTITUENTS

Are these values based on testing or knowledge? ☒ Knowledge ☐ Testing

If based on knowledge, please describe in detail, the rationale applied to identify and characterize the waste material. Please include reference to Material Safety Data Sheets (MSDS) when applicable. Include the chemical or trade-name represented by the MSDS, and or detailed process or operating procedures which generate the waste.

Process knowledge of washing boats and barges ; sample sent to White Caste

Please indicate which constituents below apply. Concentrations must be entered when applicable to assist in accurate review and expedited approval of your waste profile. Please note that the total regulated metals and other constituents sections require answers.

RCRA	REGULATED METALS	REGULATORY LEVEL (mg/l)	TCLP mg/l	TOTAL	UOM	NOT APPLICABLE
D004	ARSENIC	5.0				☒
D005	BARIUM	100.0				☒
D006	CADMIUM	1.0				☒
D007	CHROMIUM	5.0				☒
D008	LEAD	5.0				☒
D009	MERCURY	0.2				☒
D010	SELENIUM	1.0				☒
D011	SILVER	5.0				☒
VOLATILE COMPOUNDS						
D018	BENZENE	0.5				☒
D019	CARBON TETRACHLORIDE	0.5				☒
D021	CHLOROBENZENE	100.0				☒
D022	CHLOROFORM	6.0				☒
D028	1,2-DICHLOROETHANE	0.5				☒
D029	1,1-DICHLOROETHYLENE	0.7				☒
D035	METHYL ETHYL KETONE	200.0				☒
D039	TETRACHLOROETHYLENE	0.7				☒
D040	TRICHLOROETHYLENE	0.5				☒
D043	VINYL CHLORIDE	0.2				☒
SEMI-VOLATILE COMPOUNDS						
D023	o-CRESOL	200.0				☒
D024	m-CRESOL	200.0				☒
D025	p-CRESOL	200.0				☒
D026	CRESOL (TOTAL)	200.0				☒
D027	1,4-DICHLOROBENZENE	7.5				☒
D030	2,4-DINITROTOLUENE	0.13				☒
D032	HEXACHLOROBENZENE	0.13				☒
D033	HEXACHLOROBUTADIENE	0.5				☒
D034	HEXACHLOROETHANE	3.0				☒
D036	NITROBENZENE	2.0				☒
D037	PENTACHLOROPHENOL	100.0				☒
D038	PYRIDINE	5.0				☒
D041	2,4,5-TRICHLOROPHENOL	400.0				☒
D042	2,4,6-TRICHLOROPHENOL	2.0				☒
PESTICIDES AND HERBICIDES						
D012	ENDRIN	0.02				☒
D013	LINDANE	0.4				☒
D014	METHOXYCHLOR	10.0				☒
D015	TOXAPHENE	0.5				☒
D016	2,4-D	10.0				☒
D017	2,4,5-TP (SILVEX)	1.0				☒
D020	CHLORDANE	0.03				☒
D031	HEPTACHLOR (AND ITS EPOXIDE)	0.008				☒
OTHER CONSTITUENTS						
				BROMINE		☒
				CHLORINE		☒
				FLUORINE		☒
				IODINE		☒
				SULFUR		☒
				POTASSIUM		☒
				SODIUM		☒
				AMMONIA		☒
				CYANIDE AMENABLE		☒
				CYANIDE REACTIVE		☒
				CYANIDE TOTAL		☒
				SULFIDE REACTIVE		☒
HOCs						
☒ NONE						
< 1000 PPM						
>= 1000 PPM						
PCBs						
☒ NONE						
< 50 PPM						
>=50 PPM						
IF PCBs ARE PRESENT, IS THE WASTE REGULATED BY TSCA 40 CFR 761?						
YES ☒ NO						

ADDITIONAL HAZARDS

DOES THIS WASTE HAVE ANY UNDISCLOSED HAZARDS OR PRIOR INCIDENTS ASSOCIATED WITH IT, WHICH COULD AFFECT THE WAY IT SHOULD BE HANDLED?

YES ☒ NO (If yes, explain)

CHOOSE ALL THAT APPLY

DEA REGULATED SUBSTANCES

EXPLOSIVE

FUMING

OSHA REGULATED CARCINOGENS



POLYMERIZABLE

RADIOACTIVE

REACTIVE MATERIAL



NONE OF THE ABOVE



F. REGULATORY STATUS

YES	☒	NO	USEPA HAZARDOUS WASTE?	
YES	☒	NO	DO ANY STATE WASTE CODES APPLY?	
			Texas Waste Code	
YES	☒	NO	DO ANY CANADIAN PROVINCIAL WASTE CODES APPLY?	
YES	☒	NO	IS THIS WASTE PROHIBITED FROM LAND DISPOSAL WITHOUT FURTHER TREATMENT PER 40 CFR PART 268?	
			LDR CATEGORY:	Not subject to LDR
			VARIANCE INFO:	
YES	☒	NO	IS THIS A UNIVERSAL WASTE?	
YES	☒	NO	IS THE GENERATOR OF THE WASTE CLASSIFIED AS A VERY SMALL QUANTITY GENERATOR (VSQG) OR A STATE EQUIVALENT DESIGNATION?	
YES		NO	IS THIS MATERIAL GOING TO BE MANAGED AS A RCRA EXEMPT COMMERCIAL PRODUCT, WHICH IS FUEL (40 CFR 261.2 (C)(2)(II))?	
YES	☒	NO	DOES TREATMENT OF THIS WASTE GENERATE A F006 OR F019 SLUDGE?	
YES		NO	IS THIS WASTE STREAM PROHIBITED FROM INCINERATION BASED ON THE INORGANIC METAL BEARING WASTE PROHIBITION FOUND AT 40 CFR 268.3(C)?	
YES		NO	IS THIS WASTE STREAM "USED OIL" WHICH IS TO BE MANAGED UNDER 40 CFR PART 279 - STANDARDS FOR THE MANAGEMENT OF USED OIL?	
YES	☒	NO	DOES THIS WASTE CONTAIN VOC'S IN CONCENTRATIONS >=500 PPM?	
YES		NO	DOES THE WASTE CONTAIN GREATER THAN 20% OF ORGANIC CONSTITUENTS WITH A VAPOR PRESSURE >= .3KPA (.044 PSIA)?	
YES	☒	NO	DOES THIS WASTE CONTAIN AN ORGANIC CONSTITUENT WHICH IN ITS PURE FORM HAS A VAPOR PRESSURE > 76.6 KPA (11.1 PSIA)?	
YES	☒	NO	IS THIS CERCLA REGULATED (SUPERFUND) WASTE ?	
YES	☒	NO	IS THE WASTE SUBJECT TO ONE OF THE FOLLOWING NESHAP RULES?	
			Hazardous Organic NESHAP (HON) rule (subpart G)	Pharmaceuticals production (subpart GGG)
YES		NO	IF THIS IS A US EPA HAZARDOUS WASTE, DOES THIS WASTE STREAM CONTAIN BENZENE?	
YES		NO	Does the waste stream come from a facility with one of the SIC codes listed under benzene NESHAP or is this waste regulated under the benzene NESHAP rules because the original source of the waste is from a chemical manufacturing, coke by-product recovery, or petroleum refinery process?	
YES		NO	Is the generating source of this waste stream a facility with Total Annual Benzene (TAB) >10 Mg/year?	
			What is the TAB quantity for your facility?	
				Megagram/year (1 Mg = 2,200 lbs)
			The basis for this determination is: Knowledge of the Waste Or Test Data	Knowledge Testing
			Describe the knowledge :	

G. DOT/TDG INFORMATION

DOT/TDG PROPER SHIPPING NAME:

NON DOT REGULATED MATERIAL, (WASTEWATER)

H. TRANSPORTATION REQUIREMENTS

ESTIMATED SHIPMENT FREQUENCY ONE TIME WEEKLY MONTHLY ☒ QUARTERLY YEARLY OTHER Other

CONTAINERIZED	☒ BULK LIQUID	BULK SOLID
<u>0-0</u> CONTAINERS/SHIPMENT	GALLONS/SHIPMENT: 3000.00 Min -5000.00 GAL.	SHIPMENT UOM: TON YARD
STORAGE CAPACITY:	Max	TONS/YARDS/SHIPMENT: 0 Min - 0 Max
CONTAINER TYPE:		
PORTABLE TOTE TANK	BOX CARTON CASE	
CUBIC YARD BOX	DRUM	
OTHER:	DRUM SIZE:	

I. SPECIAL REQUEST

COMMENTS OR REQUESTS:

GENERATOR'S CERTIFICATION

I certify that I am authorized to execute this document as an authorized agent. I hereby certify that all information submitted in this and attached documents is correct to the best of my knowledge. I also certify that any samples submitted are representative of the actual waste. If Clean Harbors discovers a discrepancy during the approval process, Generator grants Clean Harbors the authority to amend the profile, as Clean Harbors deems necessary, to reflect the discrepancy.

AUTHORIZED SIGNATURE

NAME (PRINT)

TITLE

DATE



Addendum

D. COMPOSITION

F. REGULATORY STATUS

APPENDIX 4. NME RESPONSE LETTER ON 4/10/2025



April 10, 2024

Vince Damiano
Vince.Damiano@erg.com
EPA Inspection 2025

NME has been actively taking steps since our meeting to resolve all issues that were discussed. I have attached pictures showing the labeling "USED OIL" on the Frac tanks. Also, *the totes and drums in secondary containment under the covered area. The Drums in picture have since been brought to MIKE's for disposal.*

The HW-1 form has been filled out and emailed over to Small Business Assistance DEQ as of 4/9/25, it was submitted to Aylissa Auzenne(337-262-5581). I am awaiting a reply. Other Correspondence that I have personally talked with are DEQ Jennifer Willaims (225-219-1352), DEQ Daniel(225-219-1333) . Once DEQ reviews then it will be forwarded to permits division, then back to DEQ. Thanks.

Kind Regards,

Kenneth Bubba Nini

Please contact us with any questions.

Bubba Nini
National Marine Environmental
Operations
Cell: 985-312-3151
Office: 985-354-6003
E-mail: bubba.nationalcompanies@gmail.com

**1010 Jackson Road
Morgan City, La 70380
Office: 985-354-6003**

APPENDIX 5. PHOTOS FROM NME RESPONSE ON 4/10/2025





