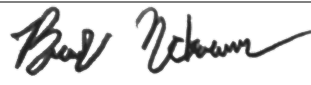


INSPECTION REPORT

Inspection Entry Date/Time	4/17/2024 09:00 AM (CT)	Announced: No		
Inspection Exit Date/Time	4/17/2023 5:05 PM (CT) Closing Conference	Access: Granted		
Regulatory Program	RCRA			
Type of Inspection	Focused Compliance Inspection (FCI)			
Facility or Site Name	Clean Tank, LLC and Frac Tank, LLC (tenants of In Hot Water, LLC)			
Facility/Site Identifier	LAR000101327			
Facility/Site Physical Address	164 Dudley Bernard Rd			
City, State, Zip Code	Golden Meadow, LA 70357			
County/Borough	Lafourche Parish			
Generator Status	Large Quantity Generator (LQG)			
NAICS	<u>213112</u>			
Type of Operation	Support Activities for Oil and Gas Operations			
Geographic Coordinates	29.127197, -90.20356			
Mailing Address/Secondary Address	N/A			
City, State, Zip Code	N/A			
Permit Number (If Applicable)	Not Applicable			
Additional Persons Participating in Inspection:				
Name	Title	Organization	Email	Phone
Joyce Johnson	Inspector	EPA REGION 6	Johnson.Joyce-r6@epa.gov	(214) 665-8548
Dedriel Gardner	Inspector	EPA REGION 6	Gardner.Dedriel@epa.gov	(281) 983-2133
George Wieber	Contractor	Eastern Research Group (ERG)	George.Wieber@erg.com	443-883-5253
Lead Inspector:				
Brook McKeown				9/11/2024
	ERG		Brook.McKeown@erg.com	(410) 459-5811

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

Port Fourchon 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 **Error! Reference source not found.**), 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/ Contactor/ERG	Brook McKeown	(410) 459-5811	Brook.McKeown@erg.com	Yes	Yes
RCRA Inspector/ Contractor/ERG	George Wieber	443-883-5253	George.Wieber@erg.com	Yes	Yes
Inspector/Enforcement Officer/EPA Region 6	Joyce Johnson	(214) 665-8548	Johnson.Joyce-r6@epa.gov (not in attendance for after noon activities)	Yes	Yes (via phone)
Inspector/Enforcement Officer/EPA Region 6	Dedriel Gardner	(281) 983-2133	Gardner.Dedriel@epa.gov (not in attendance for after noon activities)	Yes	Yes (via phone)

Facility General Description

Tenant/Area	Inspection Date	Process Description	Area of Concern
Clean Tank, LLC	4/17/24	Clean Tank, LLC (Clean Tank) operates as a tenant of In Hot Water LLC (In Hot Water) and is co-located with Frac Tank LLC (Frac Tank). In Hot Water, Clean Tank and Frac Tank are all associated with the Edison Chouest family of companies and are staffed by Cajun Ironworkers. In Hot Water does not have any physical operations at the facility, outside of being the leaseholder. Clean Tank cleans vessels and portable containers onsite. Clean Tank also has mobile operations and may clean vessels or containers at client sites. Washing may be performed for tanks or containers that contained Exploration and Production (E&P) wastes or non-E&P raw materials. Prior to cleaning, Clean Tank removes residuals from tank vessels for recovery. Washing operations generate residuals and wash water that are collected and sent offsite for recycling or disposal. Clean Tank also accepts used oil from other companies for transfer to the destination facility. In Hot Water LLC has applied for a MARPOL COA.	Yes
Frac Tank, LLC	4/17/24	Frac Tank, LLC (Frac Tank) operates as a tenant of In Hot Water LLC and is co-located with Clean Tank. In Hot Water does not have any physical operations at the facility, outside of being the leaseholder. In Hot Water, Frac Tank and Clean Tank are associated with the Edison Chouest family of companies and are staffed by Cajun Ironworkers. Frac Tank operations include managing and leasing frac tanks for Clean Tank and other clients at different port locations. Frac Tank does not operate as the owner of materials inside the frac tanks and is not a generator of hazardous waste.	No

SECTION II – OBSERVATIONS**Tenant:** Clean Tank, LLC**Section:** 2.1**Date:** 4/17/2024, 9:00 A.M.**Contains AOC:** Yes **Contains CBI:** No**Lead Inspector:** Brook McKeown**Attendees:** Matt Labat (QHSE Manager), Darrell Lafont (Facility Foreman), Brennan Carriere (QHSE Coordinator), Keith Stacum (QHSE Coordinator), Adrian Rios (Manager)

Facility personnel provided the inspection team with an overview of operations at Clean Tank. Clean Tank operates as a tenant of In Hot Water, LLC, which holds the lease to its port location. Clean Tank operates by removing residuals and cleaning portable tanks and tanks on offshore supply vessels. The tanks cleaned by Clean Tank may hold residuals of E&P wastes or residuals of raw materials when they arrive on site. Any residuals removed from supply vessel tanks are transferred to totes on site, and Clean Tank holds the tote on site until the customer determines whether to resell, recycle, or dispose of the residual material. Mr. Rios stated that most residual material is resold or recycled by the customer. Any residual material from supply vessel tanks that is determined to be waste is considered by Clean Tank to be generated by the customer, and the customer is listed as the generator on any outgoing manifests. Residuals removed from portable tanks and marine containers are collected with washwater in totes and disposed of as waste. Therefore, the Clean Tank may receive non-RCRA empty containers that could contain hazardous wastes and may be operating as a transfer facility. During the inspection, it was not possible to determine whether the containers at the facility awaiting cleaning were RCRA-empty or if they were not, whether the residual contained hazardous waste. The facility does not maintain detailed records to be able to determine if non-RCRA empty containing hazardous waste were processed, however, hazardous washwater can be generated at the facility from cleaning some of these containers.

[AOC#1: *The Facility has not properly evaluated whether they need a hazardous waste permit as a hazardous waste treatment facility. – 40 CFR 270.1].*

Washwater generated from supply vessel tank cleaning as well as portable tank cleaning is also considered by Clean Tank to be waste generated by the customer **[AOC #2:** *Clean Tank considers customers to be the generators of hazardous waste generated at Clean Tank's site, and Clean Tank did not include the waste amounts in determining its generator category. – 40 CFR 262.13].* Washing is performed with aqueous soap cleaners. Washwater is sampled by American Recovery, a waste contractor for Clean Tank, and profiled before being taken offsite. Washwater may be managed and shipped off as E&P waste, nonhazardous waste, or hazardous waste depending on the material washed out and the analytical data from American Recovery. Clean Tank also performs equipment and filter media cleaning for customers, with washwater managed similarly. In addition to the on-site services, Clean Tank has mobile operations as well and may perform supply vessel or portable tank cleaning at customer locations.

Clean Tank also serves as a transfer facility for used oil going to American Recovery. Clean Tank maintains three, 300-barrel tanks for accumulating used oil generated on site or used oil received from customers. The used oil is picked up in tanker trucks by American Recovery approximately once per week or as needed. Clean Tank also receives and stores used oil containers on site before transfer to American Recovery.

Clean Tank considered itself to be a VSQG at the time of the inspection and operates as a VSQG of

hazardous waste under normal operations according to facility personnel. Hazardous waste generated on site includes paint waste, non-E&P washwater, and non-E&P residuals removed from supply vessel tanks. There was an unplanned event occurring in the Fall of 2023 that resulted in Clean Tank submitting a change in status to a LQG of hazardous waste (state notification included as Appendix 2). During the Fall of 2023, Clean Tank personnel mistakenly transported supply vessel residuals back to the Clean Tank site after they were generated from an off-site job without a manifest. Clean Tank determined the waste to be hazardous and manifested the hazardous waste off site for disposal with Clean Tank as the generator (manifests included in Appendix 3) **[AOC #3: Clean Tank transported hazardous waste generated at a client site back to the Clean Tank site, which is not a designated facility for receiving hazardous waste. Clean Tank also transported this hazardous waste without a manifest. – 40 CFR 262.10(a)(3) and 40 CFR 262.20(a)(1)].**

After the opening meeting, the inspection team conducted a visual walkthrough of the facility and dock areas starting at approximately 10:50 AM. The inspection team observed a cleaned container area, a scrapyards for out-of-service containers, several shipping crates used for supply storage, and a tightness testing area for frac tanks. The inspection team then observed a sheltered cleaning, staging, and maintenance area referred to as the “Slab” (see Appendix 1 – Photo 1). The inspection team observed the following at the Slab:

- The floor was cement and was sloped to a sump at one end for collecting any residuals or spills in the area (see Appendix 1 – Photos 2 and 3). Mr. Rios stated that the liquids in the sump get pumped to one of the three 300-barrel used oil tanks approximately weekly or every other week depending on the height of liquids in the sump **[AOC #4: Clean Tank does not make a waste determination on residual materials collected in the sump at the point of generation, and commingles the material with used oil. – 40 CFR 262.11(a)].** The sump was nearly full at the time of the inspection, and facility personnel stated that the sump may be approximately 3 feet deep. The sump ran the length of the truck wash portion of the “Slab”, which is estimated to have been about 50 feet, and was approximately 3 feet in width.
- There were seven pallets of unused paint containers that Clean Tank had received from a customer (see Appendix 1 – Photos 4 through 6, and 12 through 14). Mr. Rios determined that most of the containers were only one part of two-part coating systems, and that Clean Tank will either dispose of the unused paint or purchase the other parts in order to use them. Mr. Rios stated that the containers had been on site at Clean Tank for a few weeks. **[AOC #5: Clean Tank may be storing paint cans before or in lieu of being abandoned, and therefore have not made a hazardous waste determination, as required. – 40 CFR 262.11.2(b)(3)].** Several of the containers were observed to be rusted and the contents were leaking.
- Four, 55-gallon poly drums containing used oil-related wastes (see Appendix 1 – Photo 7). The drums were labeled as “used motor oil”, “contaminated soil”, and “oil”, but it was uncertain whether the drums had any free liquid in them. The inspection team tapped and lifted the drums, which were determined to be non-empty. **[AOC #6: Containers used to store used oil were not labeled with the words “used oil”. – 40 CFR 279.22(c)(1)].**
- Two, 55-gallon metal drums that were labeled as “unknown” and were unopened (see Appendix 1 – Photos 8 and 9). The drums appeared corroded and had faded labels as “AM Supply #4”. Clean Tank personnel stated that the drums needed to be profiled by American Recovery to make a

hazardous waste determination **[AOC #7: Potential hazardous waste containers were not labeled as hazardous waste pending analysis and did not have an accumulation start date. – 40 CFR 262.16(b)(6)(i), or 40 CFR 17(a)(5)(i)].**

- Four, 55-gallon poly drums of unknowns that were not closed, contained free liquids that appeared to be used oil-related, and were not labeled. One of the poly drums was within an overpack container due to holes in the drum (see Appendix 1 – Photos 10, 11, and 15 through 20). **[AOC #8: Clean Tank did not make a hazardous waste determination for waste containers managed on site. – 40 CFR 262.11]**
- Seventeen plastic totes that contained liquid materials with various labeling (see Appendix 1 – Photos 21 through 26, 32, and 33). Thirteen of the totes were labeled as “unknown” and had dates written on them that were within a few days of the inspection, one tote was unlabeled, and three totes were dated and had additional labeling indicating the material and/or the client that had tanks washed. Some of the totes were also uncapped and open to the air. Mr. Rios stated that American Recovery samples the totes for analysis and hazardous waste determination, with around 3 days for turnaround time of sample results **[AOC #7: Potential hazardous waste containers were not labeled as hazardous waste pending analysis and did not have an accumulation start date. – 40 CFR 262.16(b)(6)(i), or 40 CFR 17(a)(5)(i)]** **[AOC #9: Potential hazardous waste containers were not kept closed while managed on site. – 40 CFR 262.16(b)(2)(iii), or 40 CFR 262.17(a)(1)(iv)].** The inspection team also noted that the totes did not have adequate aisle space to provide for identification or access to all totes in cases of emergency **[AOC #10: Clean Tank did not manage potentially hazardous waste containers with adequate aisle space to respond in case of emergencies. – 40 CFR 262.16(b)(8)(v), or 40 CFR 262.255].** American Recovery manages handling and shipment of the washwater totes after sampling and waste determination.
- Five, 55-gallon poly drums that were non-empty based on tapping the sides and lifting one side to feel the weight (see Appendix 1 – Photos 27 through 30). The drums had labels such as “oily rags”, “dirty motor oil”, or “used oil” which suggested that the drums contained used oil-related material, but not all of the drums were labeled as “used oil” **[AOC #6: Containers used to store used oil were not labeled with the words “used oil”. – 40 CFR 279.22(c)(1)].** Clean Tank personnel were uncertain if the drums were generated on site or if they were received from a customer for transfer. One drum was labeled with a date of 2/10/24, which is greater than 35 days prior to the inspection. During follow-up correspondence, Clean Tank clarified that the drum was generated during on site operations.
- Three supersacks labeled as “EcoServ Job #61.10826” (see Appendix 1 – Photo 31). The inspection team requested that Clean Tank send documentation regarding the nature of the material in the supersacks.
- Three plastic totes were located in the cleaning area of the Slab and in use for portable tank washing at the time of the inspection. The containers were labeled as “Hess” and dated for the same day of the inspection or the day before.

The inspection team then moved to observe the three used oil tanks located outside the Slab along its southern edge. The three used oil tanks were not labeled with the words “used oil” (see Appendix 1 – Photos 34 and 35) **[AOC #6: Tanks used to store used oil were not labeled with the words “used oil”. – 40 CFR 279.22(c)(1)].** American Recovery performs basic sediment and water (BSW) field testing of the material in the tank prior to pumping out and taking off site.

The inspection team then observed other areas of the Clean Tank site, including a staging area for RCRA-empty containers received on site prior to washing, frac tank staging areas, and the three docks located on site. At the time of the inspection, Clean Tank was cleaning two supply vessels that had contained E&P waste and one supply vessel that had contained non-E&P fuel product. The inspection team observed labels on frac tanks that were actively being used for holding washwater during supply vessel tank cleaning (see Appendix 1 – Photos 36 and 37). There was also an area of the site leased from In Hot Water, LLC to Halliburton for drilling mud formulation. The inspection team did not observe the part of the facility leased to Halliburton. The inspection team did not observe other areas of concern at the time of the inspection.

A closing conference was conducted at approximately 4:00 PM with Clean Tank personnel. The AOCs were communicated during the closing and follow-up email from the inspection team the same day; however, further EPA review may change or add to the facility's potential AOCs. Following the inspection, the inspection team requested additional documentation as well as any responses to address the apparent AOCs identified. Clean Tank provided documentation and responses via emails on 4/30/2024 and 5/3/2024. Clean Tank's email responses to areas of concern can be found in Appendix 4, and Clean Tank's audit report containing corrective actions taken to address AOCs is included in Appendix 5. The inspection team noted the following after reviewing the email response and provided documentation.

- The supersacks at the Slab labeled as "EcoServ Job #61.10826" contained cement.
- Clean Tank stated in its email response that it purchased the complementary part A/B for the unused paint cans stored at the Slab. The response also stated that the paint cans were transferred to the designated paint locker on site.
- Clean Tank identified the two 55-gallon metal drums labeled "unknown" as paint thinner. Clean Tank stated in its email response that they profiled the waste and will manage it as hazardous waste for disposal.
- Clean Tank provided chain of custody files for samples taken from the seventeen totes at the Slab during the inspection (Appendix 6). Samples were collected on 4/25/2024 following the inspection. Additionally, Clean Tank provided photograph examples of labeled washwater totes in its corrective action audit report (Appendix 5), although the tote labels in the photographs did not appear to indicate that they were hazardous waste pending analysis.
- For the four unlabeled 55-gallon poly drums at the Slab that contained free liquids that appeared to be used oil-related, Clean Tank provided additional information in its email response. For the poly drum located in an overpack container, Clean Tank stated that the material was used oil generated on site, and that they transferred the used oil into one of the three used oil tanks on site. For the remaining three poly drums, Clean Tank stated that they were generated on site, and that they contacted a vendor to begin the sampling process.
- For the drum of used oil dated 2/10/24, Clean Tank stated in its email response that the used oil in the drum was generated on site during maintenance activities.
- Clean Tank provided a photograph of the used oil tanks in their email response showing the tanks labeled as "used oil" (Appendix 4). Clean Tank specified that waste streams going into the three used oil tanks on site include washwater from fuel tank cleaning, used oil tank cleaning, and bilge cleaning as well as material collected in the sump at the Slab. The email response also stated that

Clean Tank contacted its vendor to begin a sampling process for the three used oil tanks. An example used oil manifest for material pumped out of the used oil tanks was provided by Clean Tank and is included as Appendix 7, which includes the BSW field test results for the shipment.

- Clean Tank provided a document of standard operating procedures for cleaning various tanks (included as Appendix 8). The document did not specify waste profiling or determination procedures for cleaning wastes and included statements such as “pumped into a holding tank to be disposed of at a regulatory site” or “hailed to a waste disposal company, chosen by the customer”.
- The inspection team had also requested “any and all documentation of all non E&P shipments that left the site from November 17, 2023 through April 17, 2024 [including] documentation that shows the date material left the site, the volume of material, what the material was and the destination facility” as part of the email request. Clean Tank provided manifests and shipping papers which included nonhazardous wastes going to injection wells, treatment and disposal facilities, or landfills (manifests included as Appendix 9). Most of the non E&P shipments were washwater or drill water, and none were denoted as hazardous on the manifests.

Tenant: Frac Tank, LLC (co-located with Clean Tank, LLC)

Section: 2.2	Date: 4/17/2024, 9:00 A.M.	Contains AOC: No	Contains CBI: No
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Lead Inspector: Brook McKeown	Attendees: Matt Labat (QHSE Manager), Darrell Lafont (Facility Foreman), Brennan Carriere (QHSE Coordinator), Keith Stacum (QHSE Coordinator), Adrian Rios (Manager)
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The Frac Tank inspection was conducted concurrently with the Clean Tank inspection since both companies are co-located as tenants of In Hot Water, LLC and are owned and operated by the same company. Facility personnel provided the inspection team with an overview of operations at Frac Tank. Frac Tank owns and leases frac tanks for various clients, including Clean Tank. The frac tanks are used and managed by the clients; Frac Tank does not generate, transport, or manage the waste or materials placed into its leased tanks. Frac tanks used onsite during the inspection were in use by Clean Tank. Frac Tank is a non-generator of hazardous waste.

While at the In Hot Water LLC site, the inspection team conducted a brief walkthrough and did not observe any apparent AOCs associated with Frac Tank’s operations. The inspection team requested an inventory of the frac tanks at the site, which was sent to the inspection team via email on 5/3/2024.

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.

Tenant: Clean Tank, LLC

AOC #1 – Clean Tank has not properly evaluated whether they need a hazardous waste permit as a hazardous waste treatment facility.	Citation: 40 CFR 270.1	Section: 2.1
AOC #2 – Clean Tank considers customers to be the generators of hazardous waste generated at Clean Tank’s site, and CleanTank did not include the waste amounts in determining its generator category.	Citation: 40 CFR 262.13	Section: 2.1
AOC #3 – Clean Tank transported hazardous waste generated at a client site back to the Clean Tank site, which is not a designated facility for receiving hazardous waste. Clean Tank also transported this hazardous waste without a manifest.	Citation: 40 CFR 262.10(a)(3) and 40 CFR 262.20(a)(1)]	Section: 2.1
AOC #4 – Clean Tank does not make a waste determination on residual materials collected in the sump at the point of generation and commingles the material with used oil.	Citation: 40 CFR 262.11(a)	Section: 2.1
AOC #5 – Clean Tank may be storing paint cans before or in lieu of being abandoned.	Citation: 40 CFR 261.2(b)(3)	Section: 2.1
AOC #6 – Tanks used to store used oil were not labeled with the words “used oil”.	Citation: 40 CFR 279.22(c)(1)	Section: 2.1
AOC #7 – Potentially hazardous waste containers were not labeled as hazardous waste pending analysis and did not have an accumulation start date.	Citation: 40 CFR 262.16(b)(6)(i) or 40 CFR 17(a)(5)(i)	Section: 2.1
AOC #8 – Clean Tank did not make a hazardous waste determination for waste containers managed on site.	Citation: 40 CFR 262.11	Section: 2.1
AOC #9 – Potentially hazardous waste containers were not kept closed while managed on site.	Citation: 40 CFR 262.16(b)(2)(iii) or 40 CFR 262.17(a)(1)(iv)	Section: 2.1
AOC #10 – Clean Tank did not manage potentially hazardous waste containers with adequate aisle space to respond in case of emergencies.	Citation: 40 CFR 262.16(b)(8)(v) or 40 CFR 262.255	Section: 2.1
Tenant: Frac Tank, LLC		
None.		

SECTION V – FOLLOW UP

Documents or files provided by the facilities 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. 4/30/2024 email – Matt Labat provided an internal corrective action audit report as an attachment to the email.
2. 5/3/2024 email – Matt Labat provided requested documentation as attachments, and written responses to areas of concern and follow-up questions from EPA.

SECTION VI – LIST OF APPENDICES

Appendix 1. Photograph Log

Appendix 2. Generator Status Change Notification

Appendix 3. Manifests from Fall 2023 Incident

Appendix 4. Clean Tank Email Responses

Appendix 5. Corrective Action Audit Report

Appendix 6. Chain of Custody for Tote Samples

Appendix 7. Example Manifest for Used Oil

Appendix 8. Standard Operating Procedures for Cleaning

Appendix 9. Non E&P Waste Manifests

APPENDIX 1.
PHOTOGRAPH LOG



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Photograph Log

Photo No. 1

Location: Clean Tank, LLC		
City: Golden Meadow	County/Parish: Lafourche	State: Louisiana



Photo File Name: DSCN1009

Date of Photo: 04/17/2024

Time of Photo: 11:25 hrs.

Photographer: George Wieber

Description: View of the Slab with containers staged and container cleaning operations at the far end.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 2

Location: Clean Tank, LLC		
City: Golden Meadow	County/Parish: Lafourche	State: Louisiana



Photo File Name: DSCN1010

Date of Photo: 04/17/2024

Time of Photo: 11:30 hrs.

Photographer: George Wieber

Description View of the sump along the side of the Slab.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 3

Location: Clean Tank, LLC		
City: Golden Meadow	County/Parish: Lafourche	State: Louisiana



Photo File Name: DSCN1011

Date of Photo: 04/17/2024

Time of Photo: 11:31 hrs.

Photographer: George Wieber

Description: View of the sump in the Slab with liquids present.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 4

Location: Clean Tank, LLC		
City: Golden Meadow	County/Parish: Lafourche	State: Louisiana



Photo File Name: DSCN1012

Date of Photo: 04/17/2024

Time of Photo: 11:42 hrs.

Photographer: George Wieber

Description: Non-empty paint containers staged in the Slab that were received from a customer.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Photograph Log

Photo No. 5

Location: Clean Tank, LLC		
City: Golden Meadow	County/Parish: Lafourche	State: Louisiana



Photo File Name: DSCN1013

Date of Photo: 04/17/2024

Time of Photo: 11:47 hrs.

Photographer: George Wieber

Description: Non-empty paint containers staged in the Slab that were received from a customer.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 6

Location: Clean Tank, LLC

City: Golden Meadow

County/Parish: Lafourche

State: Louisiana



Photo File Name: DSCN1014

Date of Photo: 04/17/2024

Time of Photo: 11:47 hrs.

Photographer: George Wieber

Description: Non-empty paint containers staged in the Slab that were received from a customer.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 7

Location: Clean Tank, LLC		
City: Golden Meadow	County/Parish: Lafourche	State: Louisiana



Photo File Name: DSCN1015

Date of Photo: 04/17/2024

Time of Photo: 11:48 hrs.

Photographer: George Wieber

Description: Four non-empty 55-gallon drums staged in the Slab that contained used oil-related wastes, but were not labeled "used oil".



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 8

Location: Clean Tank, LLC		
City: Golden Meadow	County/Parish: Lafourche	State: Louisiana



Photo File Name: DSCN1016

Date of Photo: 04/17/2024

Time of Photo: 11:57 hrs.

Photographer: George Wieber

Description: Two non-empty 55-gallon drums staged in the Slab with faded commercial labels and a written label of "unknown".



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 9

Location: Clean Tank, LLC		
City: Golden Meadow	County/Parish: Lafourche	State: Louisiana



Photo File Name: DSCN1017

Date of Photo: 04/17/2024

Time of Photo: 11:57 hrs.

Photographer: George Wieber

Description: Commercial label of one of the two 55-gallon drums shown in Photo No. 8 of this photo log.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 10

Location: Clean Tank, LLC		
City: Golden Meadow	County/Parish: Lafourche	State: Louisiana



Photo File Name: DSCN1018

Date of Photo: 04/17/2024

Time of Photo: 11:59 hrs.

Photographer: George Wieber

Description: A 55-gallon drum with no label and holes in it that was placed in an overpack container staged in the Slab. The material inside appeared to be used oil-related.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 11

Location: Clean Tank, LLC		
City: Golden Meadow	County/Parish: Lafourche	State: Louisiana



Photo File Name: DSCN1019

Date of Photo: 04/17/2024

Time of Photo: 12:02 hrs.

Photographer: George Wieber

Description: View of the overpack container holding an open 55-gallon drum of used oil-related material as shown in Photo No. 10 of this photo log.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 12

Location: Clean Tank, LLC		
City: Golden Meadow	County/Parish: Lafourche	State: Louisiana



Photo File Name: DSCN1020

Date of Photo: 04/17/2024

Time of Photo: 12:04 hrs.

Photographer: George Wieber

Description: Non-empty paint containers staged in the Slab that were received from a customer and had signs of corrosion and leaking.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 13

Location: Clean Tank, LLC		
City: Golden Meadow	County/Parish: Lafourche	State: Louisiana



Photo File Name: DSCN1021

Date of Photo: 04/17/2024

Time of Photo: 12:04 hrs.

Photographer: George Wieber

Description: Non-empty paint containers staged in the Slab that were received from a customer and had signs of corrosion and leaking.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 14

Location: Clean Tank, LLC		
City: Golden Meadow	County/Parish: Lafourche	State: Louisiana

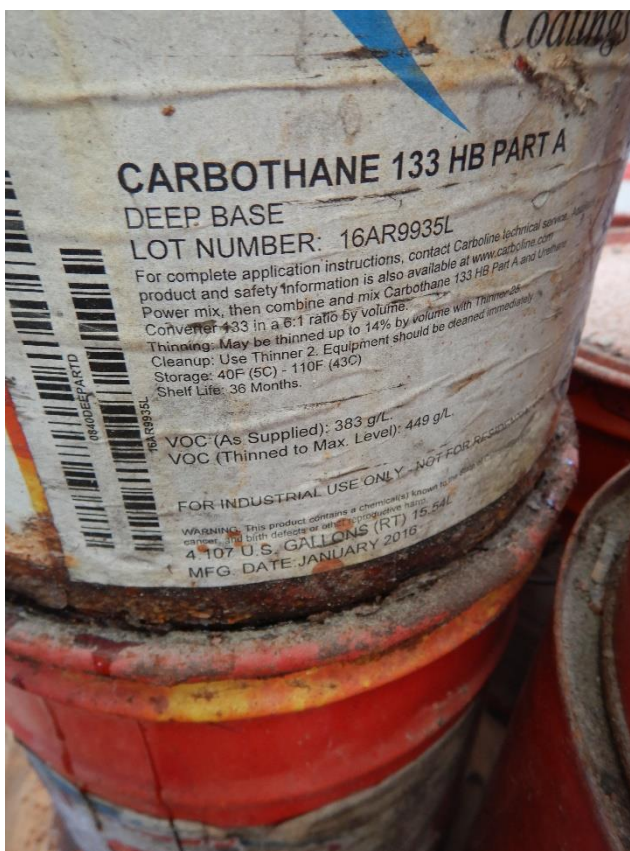


Photo File Name: DSCN1022

Date of Photo: 04/17/2024

Time of Photo: 12:06 hrs.

Photographer: George Wieber

Description: Product label on a non-empty paint container staged in the Slab that was received from a customer. The paint container had signs of corrosion.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 15

Location: Clean Tank, LLC		
City: Golden Meadow	County/Parish: Lafourche	State: Louisiana



Photo File Name: DSCN1023

Date of Photo: 04/17/2024

Time of Photo: 12:10 hrs.

Photographer: George Wieber

Description: View of an unlabeled 55-gallon drum staged in the Slab that was not securely closed and appeared to contain used oil-related materials.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 16

Location: Clean Tank, LLC		
City: Golden Meadow	County/Parish: Lafourche	State: Louisiana



Photo File Name: DSCN1024

Date of Photo: 04/17/2024

Time of Photo: 12:11 hrs.

Photographer: George Wieber

Description: View of an unlabeled 55-gallon drum that appeared to contain used oil-related materials and was staged in the Slab (same container shown in Photo No. 15).



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 17

Location: Clean Tank, LLC		
City: Golden Meadow	County/Parish: Lafourche	State: Louisiana



Photo File Name: DSCN1025

Date of Photo: 04/17/2024

Time of Photo: 12:11 hrs.

Photographer: George Wieber

Description: View of an open 55-gallon drum staged in the Slab that appeared to contain used oil-related materials and did not have clear labeling.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 18

Location: Clean Tank, LLC		
City: Golden Meadow	County/Parish: Lafourche	State: Louisiana



Photo File Name: DSCN1026

Date of Photo: 04/17/2024

Time of Photo: 12:12 hrs.

Photographer: George Wieber

Description: View of an open 55-gallon drum that appeared to contain used oil-related materials and was staged in the Slab.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 19

Location: Clean Tank, LLC		
City: Golden Meadow	County/Parish: Lafourche	State: Louisiana



Photo File Name: DSC1027

Date of Photo: 04/17/2024

Time of Photo: 12:12 hrs.

Photographer: George Wieber

Description: View of an open 55-gallon drum that appeared to contain used oil-related materials and was staged in the Slab (same container shown in Photo No. 18). The drum did not have clear labeling as to the contents.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 20

Location: Clean Tank, LLC		
City: Golden Meadow	County/Parish: Lafourche	State: Louisiana



Photo File Name: DSCN1028

Date of Photo: 04/17/2024

Time of Photo: 12:13 hrs.

Photographer: George Wieber

Description: View of several drums staged in the Slab that were not securely closed, did not have clear labeling, and appeared to contain used oil-related materials (as shown in Photo Nos. 10, 11, and 15 through 19).



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 21

Location: Clean Tank, LLC		
City: Golden Meadow	County/Parish: Lafourche	State: Louisiana

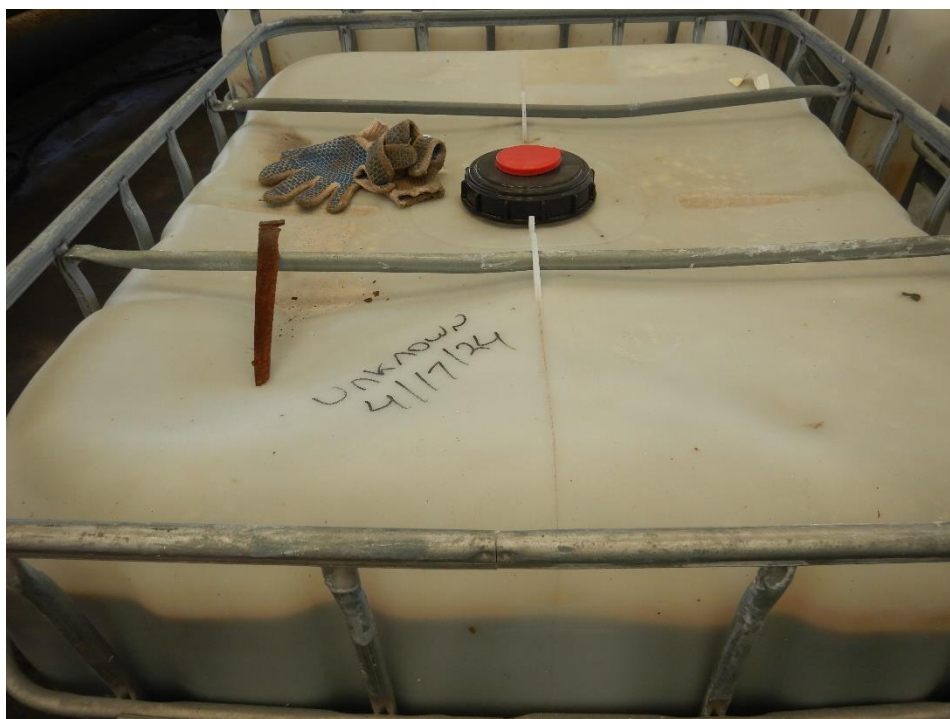


Photo File Name: DSCN1030

Date of Photo: 04/17/2024

Time of Photo: 12:17 hrs.

Photographer: George Wieber

Description: View of a label on a tote of washwater staged in the Slab.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 22

Location: Clean Tank, LLC		
City: Golden Meadow	County/Parish: Lafourche	State: Louisiana



Photo File Name: DSCN1031

Date of Photo: 04/17/2024

Time of Photo: 12:17 hrs.

Photographer: George Wieber

Description: View of a tote of washwater staged in the Slab. The container is labeled as "Unknown", with a date of 4/17/2024 and no other identifier to be able to distinguish the container from others.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 23

Location: Clean Tank, LLC		
City: Golden Meadow	County/Parish: Lafourche	State: Louisiana



Photo File Name: DSCN1032

Date of Photo: 04/17/2024

Time of Photo: 12:18 hrs.

Photographer: George Wieber

Description: View of washwater totes staged in the Slab.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 234

Location: Clean Tank, LLC		
City: Golden Meadow	County/Parish: Lafourche	State: Louisiana



Photo File Name: DSCN1033

Date of Photo: 04/17/2024

Time of Photo: 12:19 hrs.

Photographer: George Wieber

Description: View of washwater totes staged in the Slab that were not closed.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 25

Location: Clean Tank, LLC		
City: Golden Meadow	County/Parish: Lafourche	State: Louisiana

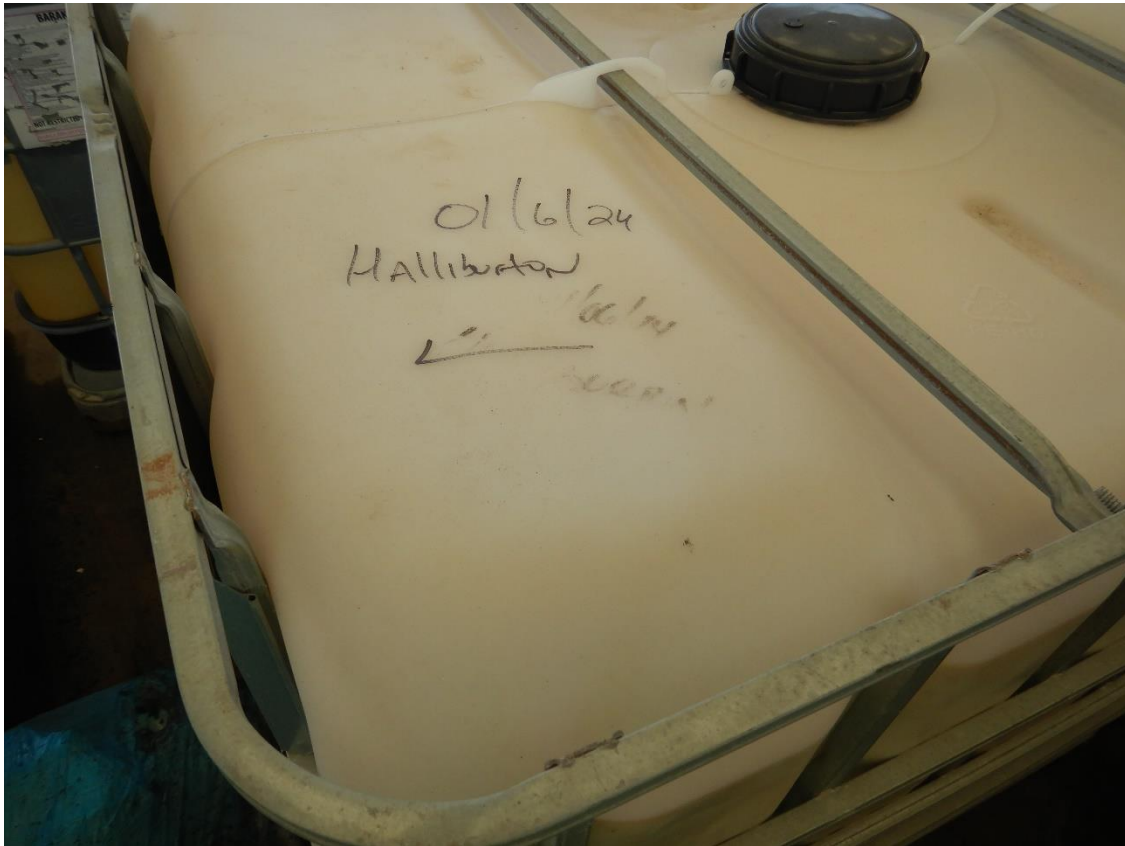


Photo File Name: DSCN1034

Date of Photo: 04/17/2024

Time of Photo: 12:34 hrs.

Photographer: George Wieber

Description: View of a label on a tote of washwater that was staged in the Slab.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 26

Location: Clean Tank, LLC		
City: Golden Meadow	County/Parish: Lafourche	State: Louisiana



Photo File Name: DSCN1035

Date of Photo: 04/17/2024

Time of Photo: 12:34 hrs.

Photographer: George Wieber

Description: View of a tote of washwater that was staged in the Slab (same container as shown in Photo No. 25).



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 247

Location: Clean Tank, LLC		
City: Golden Meadow	County/Parish: Lafourche	State: Louisiana



Photo File Name: DSCN1036

Date of Photo: 04/17/2024

Time of Photo: 12:38 hrs.

Photographer: George Wieber

Description: View of a 55-gallon drum of used oil that was labeled with a date of 2/10/24.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 25

Location: Clean Tank, LLC		
City: Golden Meadow	County/Parish: Lafourche	State: Louisiana

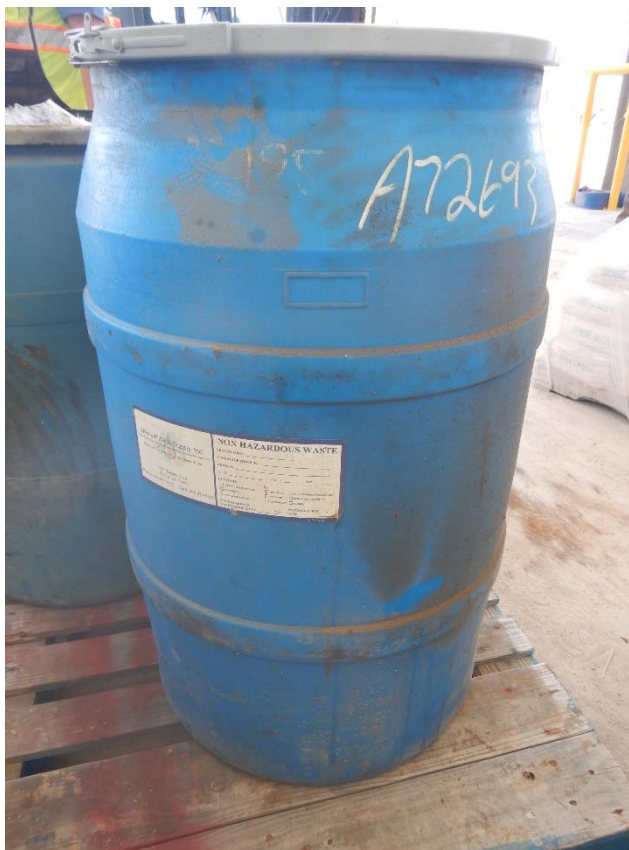


Photo File Name: DSCN1037

Date of Photo: 04/17/2024

Time of Photo: 12:40 hrs.

Photographer: George Wieber

Description: View of a 55-gallon drum staged in the Slab that had a blank label on it. The drum was staged near other drums containing used oil-related materials.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 269

Location: Clean Tank, LLC		
City: Golden Meadow	County/Parish: Lafourche	State: Louisiana

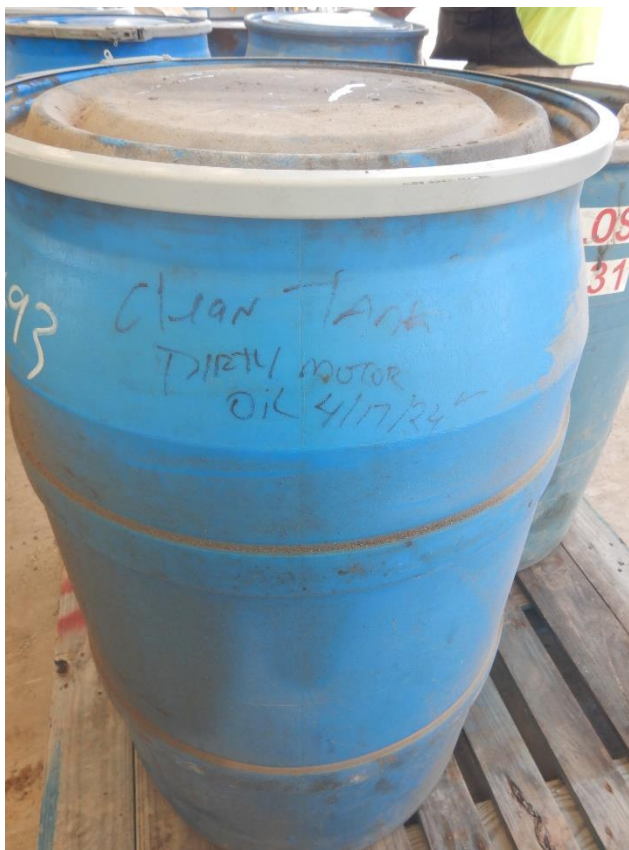


Photo File Name: DSCN1038

Date of Photo: 04/17/2024

Time of Photo: 12:41 hrs.

Photographer: George Wieber

Description: View of a 55-gallon drum staged in the Slab and labeled as "Dirty motor oil".



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 30

Location: Clean Tank, LLC		
City: Golden Meadow	County/Parish: Lafourche	State: Louisiana



Photo File Name: DSCN1039

Date of Photo: 04/17/2024

Time of Photo: 12:41 hrs.

Photographer: George Wieber

Description: View of a 55-gallon drum staged in the Slab that contained used absorbent pads for oil.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 27

Location: Clean Tank, LLC		
City: Golden Meadow	County/Parish: Lafourche	State: Louisiana

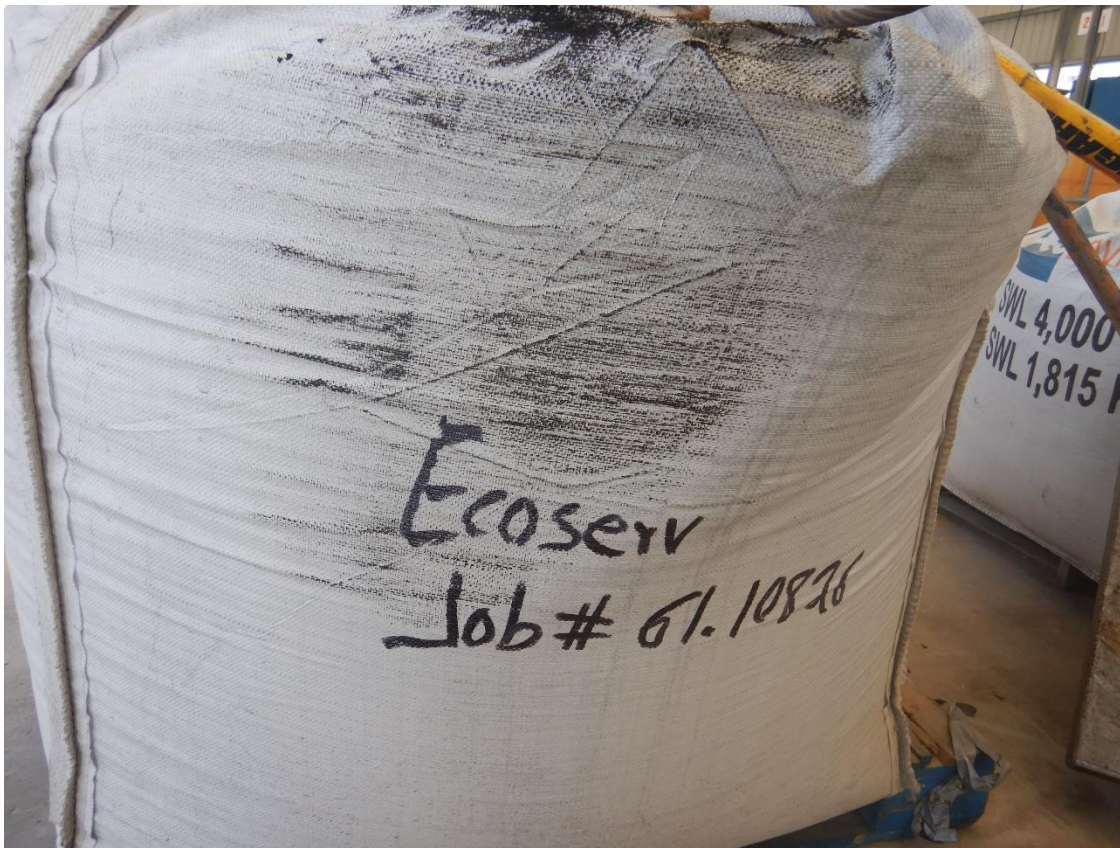


Photo File Name: DSCN1040

Date of Photo: 04/17/2024

Time of Photo: 12:42 hrs.

Photographer: George Wieber

Description: View of a supersack with a job identification label, but with no indication of the contents.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 32

Location: Clean Tank, LLC		
City: Golden Meadow	County/Parish: Lafourche	State: Louisiana



Photo File Name: DSCN1042

Date of Photo: 04/17/2024

Time of Photo: 12:46 hrs.

Photographer: George Wieber

Description: View of washwater totes staged in the Slab.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 28

Location: Clean Tank, LLC		
City: Golden Meadow	County/Parish: Lafourche	State: Louisiana



Photo File Name: DSCN1043

Date of Photo: 04/17/2024

Time of Photo: 12:46 hrs.

Photographer: George Wieber

Description: View of washwater totes staged in the Slab. Some of the totes were not closed at the time of the inspection.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 29

Location: Clean Tank, LLC		
City: Golden Meadow	County/Parish: Lafourche	State: Louisiana



Photo File Name: DSCN1044

Date of Photo: 04/17/2024

Time of Photo: 14:12 hrs.

Photographer: George Wieber

Description: View of the three used oil tanks located on site adjacent to the Slab. The tanks did not have labels identifying their contents.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 30

Location: Clean Tank, LLC		
City: Golden Meadow	County/Parish: Lafourche	State: Louisiana



Photo File Name: DSCN1045

Date of Photo: 04/17/2024

Time of Photo: 14:18 hrs.

Photographer: George Wieber

Description: View of the used oil tanks located on site adjacent to the Slab.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 31

Location: Clean Tank, LLC		
City: Golden Meadow	County/Parish: Lafourche	State: Louisiana



Photo File Name: DSCN1046

Date of Photo: 04/17/2024

Time of Photo: 14:42 hrs.

Photographer: George Wieber

Description: View of two frac tanks staged near a slip that were actively being used for vessel tank cleaning operations.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 32

Location: Clean Tank, LLC		
City: Golden Meadow	County/Parish: Lafourche	State: Louisiana



Photo File Name: DSCN1047

Date of Photo: 04/17/2024

Time of Photo: 14:42 hrs.

Photographer: George Wieber

Description: View of a label on a frac tank being used for vessel tank cleaning operations (closer view of frac tank shown in Photo No. 36).

APPENDIX 2.
GENERATOR STATUS CHANGE NOTIFICATION

APPENDIX 3.
MANIFESTS FROM FALL 2023 INCIDENT

APPENDIX 4. CLEAN TANK EMAIL RESPONSES

APPENDIX 5. CORRECTIVE ACTION AUDIT REPORT

APPENDIX 6. CHAIN OF CUSTODY FOR TOTE SAMPLES

APPENDIX 7. EXAMPLE MANIFEST FOR USED OIL

APPENDIX 8. STANDARD OPERATING PROCEDURES FOR CLEANING

APPENDIX 9. NON E&P WASTE MANIFESTS