

Region 6 - Enforcement & Compliance Assurance Division
INSPECTION REPORT

Inspection Date(s):	August 24, 2023	
Media Program:	RCRA	
Regulatory Program(s)	Large Quantity Generator	
Company Name:	Stolt Tankers USA, Inc	
Facility Name:	Stolt Barging Services	
Facility Physical Location:	16300 De Zavalla Road #3, Suite 7	
(City, State, Zip Code)	Channelview, Texas 77530	
Mailing address:	15635 Jacintoport Blvd, ATTN: BARGE	
(City, State, Zip Code)	Houston, TX 77015	
County/Parish:	Harris County	
Facility Phone Number	713-885-5951	
Facility Contact:	Corrie Henry	EHS Supervisor
	cih@stolt.com	
FRS Number:	110000896488	
Identification/Permit Number:		
Media Identifier Number:	RCRA ID: TXD988070793	
NAICS:	488320 - Marine Cargo Handling	
SIC:	4491 – Marine Cargo Handling	
Personnel participating in inspection:		
John Penland	USEPA Region 6 (ECDSR)	Lead Hazardous Waste Inspector
Sandesh Thapa	USEPA Region 6 (ECDSR)	Assistant Hazardous Waste Inspector
Corrie Henry	Stolt Barge Services	EHS Supervisor
EPA Lead Inspector Signature/Date		
	John Penland – Senior Environmental Scientist (ECDSR)	Date
Supervisor Signature/Date		
	Debra Pandak – Section Chief (ECDSR)	Date

Section I – INTRODUCTION

PURPOSE OF THE INSPECTION

On August 24, 2023, I, John Penland, conducted an unannounced inspection of the Stolt Barge Services (SBS) facility located at 16300 De Zavalla Rd Ste 7, Channelview, Texas, for compliance with the Resource Conservation and Recovery Act (RCRA). I was assisted on this inspection by Environmental Protection Agency (EPA) inspector Sandesh Thapa. The inspection included walkthroughs of the facility's hazardous waste generation and management units and a review of the facility records related to hazardous waste management.

The Stolt facility was targeted for inspection as part of the Region 6 response to EPA's November 2022 Drum Reconditioner Damage Case Report.

FACILITY DESCRIPTION

The SBS Facility is located on Carpenters Bayou, approximately 1 mile from the Houston Ship Channel. The facility is a three-part facility, the first a fleeting area; the second is a transfer area for barge cleaning, gas freeing, nitrogen purging and transfer of barge heels to Department of Transportation (DOT) regulated ISO tank containers or totes, and a third area for occasional hot work.

The transfer area consists of a barge slip completely bulk headed. Incoming barges are docked, and product heels will be transferred to totes or ISO-tanks located on the covered concrete containment area.

Wash water from barge cleanings will be transferred to either hazardous wash water holding tanks on the covered concrete containment area or non-hazardous wash water holding tanks at the end of the slip located on a concrete containment slab.

Section II – INSPECTION SUMMARY

August 24, 2023

We arrived at the SBS facility at approximately 10:00am Central Time and began the inspection with an opening conference. During this conference, we presented our credentials to Mr. Corrie Henry and informed him that we were there to conduct an inspection of the facility under the authority of Section 3007 of RCRA. During this conference, we also discussed the purpose and scope of the inspection and notified them of the facility's right to assert a claim for Confidential Business Information for records collected during this inspection.

Following the opening conference, we discussed SBS' barge receiving and cleaning processes. We then conducted our walkthrough of the facility's process and storage areas. This walkthrough was focused on inspector orientation of the site and an evaluation of the facility's compliance with the hazardous waste

container and tank management standards. After the walkthrough we conducted an initial review of the facility's RCRA compliance records. We concluded our day with a closing conference where we presented our preliminary findings to the facility which are summarized in Section III of this report.

We departed the facility at approximately 3:30pm Central Time.

For our detailed observations, inspection notes, and records request, see the Daily Summary for August 23, 2023, in Appendix 2.

Section III – AREAS OF CONCERN

1. Open containers of hazardous waste - 40 CFR 262.17(a)(1)(iv)(A)

The container management standards for large quantity generators require containers accumulating hazardous waste to be kept closed unless waste is actively being added or removed. During this inspection we observed 3 containers which were in hazardous waste service and open when unattended and not being filled or emptied. Two ISO containers used for the accumulation of corrosive waste were open at the time of inspection. See photos 17, 18, 21, and 22 in Appendix 1. One container labeled as containing "VAM" in the <90-day container central accumulation area was open at the time of inspection. See photos 1, 3, 9, 10 in Appendix 1.

2. Unlabeled containers of hazardous waste - 40 CFR 262.17(a)(5)(i)

The container management standards require large quantity generators to mark containers used for the accumulation of hazardous waste with the words "Hazardous Waste"; an indication of the hazards associated with the waste; and, except for satellite accumulation containers, the date when accumulation of the waste began. During this inspection we observed, 7 containers in the central accumulation area which were not properly labeled with the words "Hazardous Waste" and 4 also missing the accumulation start date. The 2 ISO containers used for D002 hazardous waste were both missing the words "Hazardous Waste", missing the accumulation start date, and missing an indication of the hazards associated with their contents.

3. Failure to inspect a hazardous waste container central accumulation area – 40 CFR 262.17(a)(1)(v)

The hazardous waste generator standards require large quantity generators to inspect central accumulation areas at least weekly. During our initial review of the facility's accumulation area inspection records, SBS was unable to provide records for January 2023 and for the period between February 10, 2023, and June 15, 2023.

Section IV – LIST OF APPENDICES

Appendix 1 – Photo Log

Appendix 2 – Daily Summary of Inspection Notes and Observations

APPENDIX 1

PHOTO LOG

Camera:	Nikon CoolPix
S/N:	31003828
EPA Tag:	S68181

Photo Number	File Name		Date	Time	Photographer	Description
1	DSCN1150	.JPG	24-Aug-23	1050	John Penland	<90-day Container Central Accumulation Area (CAA)
2	DSCN1151	.JPG	24-Aug-23	1050	John Penland	Label detail on container of hazardous waste in CAA
3	DSCN1152	.JPG	24-Aug-23	1050	John Penland	Label detail on container of hazardous waste in CAA
4	DSCN1153	.JPG	24-Aug-23	1050	John Penland	<90-day Container Central Accumulation Area (CAA)
5	DSCN1154	.JPG	24-Aug-23	1050	John Penland	Label detail on container of hazardous waste in CAA
6	DSCN1155	.JPG	24-Aug-23	1051	John Penland	Label detail on container of hazardous waste in CAA
7	DSCN1156	.JPG	24-Aug-23	1051	John Penland	Label detail on container of hazardous waste in CAA
8	DSCN1157	.JPG	24-Aug-23	1051	John Penland	Label detail on container of hazardous waste in CAA
9	DSCN1158	.JPG	24-Aug-23	1051	John Penland	<90-day Container Central Accumulation Area (CAA)
10	DSCN1159	.JPG	24-Aug-23	1055	John Penland	Flush water containers located next CAA
11	DSCN1160	.JPG	24-Aug-23	1055	John Penland	Label detail on Flush water container located next to CAA
12	DSCN1161	.JPG	24-Aug-23	1056	John Penland	Flush water containers located next CAA
13	DSCN1162	.JPG	24-Aug-23	1056	John Penland	Flush water containers located next CAA
14	DSCN1163	.JPG	24-Aug-23	1056	John Penland	Flush water containers located next CAA
15	DSCN1164	.JPG	24-Aug-23	1056	John Penland	Flush water containers located next CAA
16	DSCN1165	.JPG	24-Aug-23	1056	John Penland	Label detail on Flush water container located next to CAA
17	DSCN1166	.JPG	24-Aug-23	1107	John Penland	ISO Containers used for the accumulation of Corrosive (D002) hazardous wastes
18	DSCN1167	.JPG	24-Aug-23	1107	John Penland	ISO Containers used for the accumulation of Corrosive (D002) hazardous wastes
19	DSCN1168	.JPG	24-Aug-23	1109	John Penland	Product Storage tank. Open hatch

Camera:	Nikon CoolPix
S/N:	31003828
EPA Tag:	S68181

Photo Number	File Name		Date	Time	Photographer	Description
20	DSCN1169	.JPG	24-Aug-23	1110	John Penland	Product Storage tank. Open hatch
21	DSCN1170	.JPG	24-Aug-23	1110	John Penland	ISO Containers used for the accumulation of Corrosive (D002) hazardous wastes
22	DSCN1171	.JPG	24-Aug-23	1110	John Penland	ISO Containers used for the accumulation of Corrosive (D002) hazardous wastes
23	DSCN1172	.JPG	24-Aug-23	1128	John Penland	Frac tank used for the accumulation of organic waste waters. Sent as recyclable to Intergulf
24	DSCN1173	.JPG	24-Aug-23	1131	John Penland	Container used for solids removal from barge washwater.
25		.JPG			John Penland	
26		.JPG			John Penland	
27		.JPG			John Penland	
28		.JPG			John Penland	
29		.JPG			John Penland	
30		.JPG			John Penland	
31		.JPG			John Penland	
32		.JPG			John Penland	
33		.JPG			John Penland	
34		.JPG			John Penland	
35		.JPG			John Penland	
36		.JPG			John Penland	
37		.JPG			John Penland	



Photo 1

Chemical
Name

Epi Chloro Hydri

HEALTH HAZARD

FIRE HAZARD

UN #
Classification

23-284

2050

REACTIVITY

SPECIFIC HAZARD

DB 1 109

WORK ORDER#

DATE:

TANK CLEANER:

TANK #

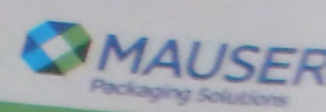
☐

CUSTOMER PICKUP

☐

DISPOSAL

RETURN
By returning your empty container to MAUSER Packaging Solutions



Chemical Name Vam

HEALTH HAZARD

FIRE HAZARD

UN #
Classification

23-260

2117
REACTIVITY

SPECIFIC HAZARD

WORK ORDER#

DATE: 6-13-23

TANK CLEANER:

TANK #

DBL-200

☐ CUSTOMER PICKUP

☐ DISPOSAL



Photo 4

Chemical
Name

HMD / WATER

HEALTH HAZARD

HEALTH HAZARD

FIRE HAZARD

UN #
Classification

SPECIFIC HAZARD

REACTIVITY

WORK ORDER#

DATE:

TANK CLEANER:

TANK #

☐

CUSTOMER PICKUP

☐

DISPOSAL

Chemical
Name

HMD / WATER

HEALTH HAZARD

FIRE HAZARD

UN #
Classification



REACTIVITY

SPECIFIC HAZARD

WORK ORDER#

DATE:

TANK CLEANER:

TANK #

☐ CUSTOMER PICKUP

☐ DISPOSAL

Chemical Name Phenol water

HEALTH HAZARD

FIRE HAZARD

UN #
Classification



REACTIVITY

SPECIFIC HAZARD

WORK ORDER#

DATE:

TANK CLEANER:

TANK #

☐ CUSTOMER PICKUP ☐ DISPOSAL

Chemical
Name

Phenol/water

HEALTH HAZARD

FIRE HAZARD

UN #
Classification

Drip
Pans



REACTIVITY

SPECIFIC HAZARD

WORK ORDER#

DATE:

7-12-23

TANK CLEANER:

TANK #

☐

CUSTOMER PICKUP

☐

DISPOSAL



Photo 9



Photo 10

2038/1041L/60kg/100kPa/

Mauser Steel Pallet 275 Gallon

Chemical
Name

DEG

HEALTH HAZARD

FIRE HAZARD

UN #
Classification



SPECIFIC HAZARD

REACTIVITY

WORK ORDER# CCL-23

DATE: 9-16-22

TANK CLEANER:

TANK #

☐ CUSTOMER PICKUP

☐ DISPOSAL

MAUSER
Packaging Solutions

CERTIFICATE

This Intermediate Bulk Container (IBC) has been properly filled, sealed, and labeled in accordance with the requirements of the U.S. Department of Transportation (DOT) and the International Organization for Standardization (ISO).

Pressure

Date Tested

Released By

Washed ☐

Rebottled ☐

Tracking Number



DOT FORM 602 Rev. 10

REDEFINING SUSTAINABILITY



Photo 12



Photo 13



HAZARDOUS
WASTE
STORAGE
AREA

FLUSH

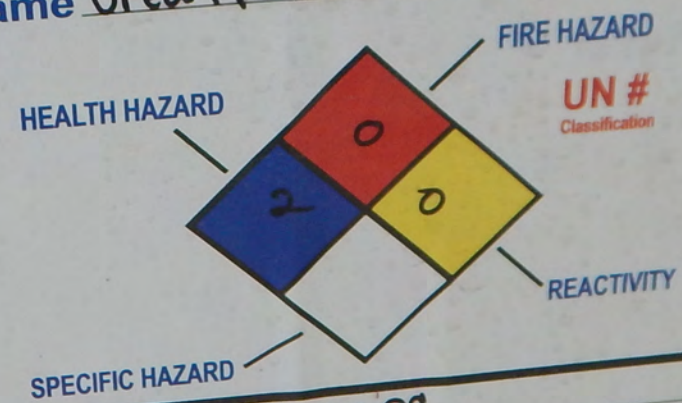
FLUSH

Photo 14



Photo 15

Chemical
Name Urea Ammonium Nitrate



WORK ORDER# 310298

DATE: 4-12-23

TANK CLEANER:

TANK #

☐ CUSTOMER PICKUP ☐ DISPOSAL



Photo 17



Photo 18



Photo 19



Photo 20



Photo 21



Photo 22





Photo 24

APPENDIX 2

SUMMARY OF INSPECTION NOTES AND OBSERVATIONS

From: [Penland, John](#)
To: [Thapa, Sandesh](#); cih@stolt.com
Cc: [Pandak, Debra \(she/her/hers\)](#)
Subject: Inspection summary 2023 EPA RCRA Inspection Stolt-Nielsen Barge Services (TXD988070793)- Channelview, TX
Date: Thursday, August 31, 2023 12:03:00 PM

All, Here is a summary of my notes from last week's inspection. Please let me know if there are any errors or omissions.

Introduction

On August 24, 2023, I, John Penland, conducted an unannounced inspection of the Stolt Barge Services facility located at 16300 De Zavalla Rd Ste 7, Channelview, Texas, for compliance with the Resource Conservation and Recovery Act (RCRA). I was assisted on this inspection by Environmental Protection Agency (EPA) inspector Sandesh Thapa. The inspection included walkthroughs of the facility's hazardous waste generation and management units and a review of the facility records related to hazardous waste management.

Purpose

The Stolt facility was targeted for inspection as part of the Region 6 response to EPA's November 2022 [Drum Reconditioner Damage Case Report](#).

Inspection Attendees:

NAME	TITLE	REPRESENTING	PHONE	EMAIL
John Penland	Lead Hazardous Waste Inspector	US EPA Region 6	214-665-9717	Penland.john@epa.gov
Sandesh Thapa	Asst. Hazardous Waste Inspector	US EPA Region 6	214-665-2265	Thapa.sandesh@epa.gov
Corrie Henry	EHS Supervisor	Stolt Tankers	713-885-5951	Cih@stolt.com

Daily Summary

- Initial Entry to the facility - approximately 10:00 am
- Opening meeting start – 10:05 am
 - I presented my credentials to Mr. Corrie Henry and informed him that we were there to conduct an inspection of the facility under the authority of section 3007 of the Resource Conservation and Recovery Act.
 - We discussed the authority for the inspection – RCRA Section 3007 - For purposes of developing or assisting in the development of any regulation or enforcing the provisions of this chapter, any person who generates, stores, treats, transports, disposes of, or otherwise handles or has handled hazardous wastes shall, upon request of any officer, employee or representative of the Environmental Protection Agency, duly designated by the Administrator, or upon request of any duly designated officer, employee or representative of a State having an authorized hazardous waste program, furnish information relating to such wastes and permit such person at all reasonable

times to have access to, and to copy all records relating to such wastes. For the purposes of developing or assisting in the development of any regulation or enforcing the provisions of this chapter, such officers, employees or representatives are authorized—

- (1) to enter at reasonable times any establishment or other place where hazardous wastes are or have been generated, stored, treated, disposed of, or transported from;
 - (2) to inspect and obtain samples from any person of any such wastes and samples of any containers or labeling for such wastes.
 - We discussed the purpose of EPA's inspection – In response to the Drum Reconditioner Damage Case Report, this inspection is intended to: Assess the Stolt facility's regulatory status (ie, VSQG, SQG, or LQG); Assess compliance with the appropriate regulatory requirements based on the facility's regulatory status, Evaluate the facility's waste identification and characterization procedures; and Identify facility operations which could pose a risk of release of hazardous waste or hazardous constituents to the air, water, or land.
 - Discussed the right of Stolt to assert a Confidential Business Information claim for records requested by EPA (see attachment)
 - Discussed the process for transferring electronic records – EPA has set up a Microsoft OneDrive folder with access limited to the inspection participants.
 - Discussed the inspection process – the onsite inspection will be conducted on August 24, 2023. The records review will be conducted by the inspectors independently offsite who will remain in the area throughout the week for additional records delivery if needed. A summary will be provided by the inspectors at the end of the onsite inspection to ensure a clear communication of questions and findings.
- General Facility Process – The Stolt facility is a Barge Cleaning facility located in Channelview, Texas. This process generates: wastewater; used ppe; and residues removed from the containers.
 - Initial request for compliance records, including:
 - Facility Maps identifying solid waste management units, if available
 - Facility waste profiles for any solid waste generated since 2020. Include documentation relevant to the waste determination made for each waste (i.e. analytical reports or documentation to support generator knowledge; see 40 CFR 262.11(f))
 - Facility SOPs and documents related to the exclusion of certain categories of container residues
 - Facility SOPs and documents related to the characterization of container residues
 - Facility SOPs and documents related to the generation or management of container residues
 - The facility contingency plan with records of distribution
 - Example service contracts describing heel ownership and transfer of residues
 - RCRA training Records for Corrie Henry, Js Hinjosa
 - Rejected Manifests
 - Weekly Inspection record for Jan 2023, Feb 10th 2023 till June 15th, 2023.

- Facility Walkthrough
 - Beginning at approximately 12:00pm- This walkthrough of the facility was focused on familiarizing the inspection team with the function and layout of the process and to identify readily apparent management concerns.
 - Receiving Dock
 - Receive Barge at working Dock and vapor space vented to a thermal oxidizer.
 - Barges are visually gauged to ensure that they are received RCRA empty.
 - Residues/heels are evaluated for marketability and drained into containers (275-gallon totes, 55-gallon drums, tanker cars, or ISO containers) or one of three product tanks sent off as Hazardous waste before washing.
 - The facility operates a central hazardous waste container accumulation area for totes and drums, and 2 ISO containers for caustic wastes located near the three, product storage tanks.
 - The facility maintains allowed chemical list to mitigate risks.
 - Barge Cleaning
 - Non-caustic detergents are used for barge washing.
 - Wastewaters are pumped from barge holds and pass through an inline strainer which is emptied every three to six months.
 - We are requesting records for the waste determination associated with this waste at this discreet point of waste generation.
 - Washwaters are passed through a vacuum box to allow settling of rust, scale, or other solids.
 - Following the vacuum box, they are passed through an oil/water separator then accumulated in a wastewater storage tank prior to transport to Delta Water Processing, a TPDES permitted centralized wastewater treatment facility.
 - Hoses and contaminated equipment are rinsed into a Frac tank contains organic wastewater which are sent off as “recyclable” to InterGulf.
 - Contaminated PPE is sent off in roll off box as non-hazardous waste.
 - Container Storage:
 - Central Container Accumulation Area
 - 7 containers located in the hazardous waste container central accumulation area were not labeled as hazardous waste.
 - 4 containers located in the hazardous waste container central accumulation area were not labeled with an accumulation start date.
 - 1 container located in the hazardous waste container central accumulation area was open at the time of inspection.
 - 10 Totes were staged near the Central Accumulation Area. According to Corrie Henry these were flush water from the cleaning of contaminated equipment and would be pumped to the frac tank.
 - ISO Containers
 - These containers were open and unlabeled at the time of inspection.
 - Frac Tank
 - This tank was open and unlabeled at the time of inspection.
- Facility Operations Discussion

Following the facility walkthrough we discussed the regulatory applicability of RCRA to the processes we observed during the walkthrough.

- Especially of note is that the exemption that applies to residues remaining in RCRA-empty containers only applies while those residues remain in their original container. Any residues removed from the container are subject to full regulation at the time they are removed. This includes the waste determination provisions of 40 CFR 262.11; the waste counting provisions of 40 CFR 262.13; and the Land disposal restrictions in 40 CFR part 268.
 - Please note that this is distinct from rinsates generated during the washing of containers which, while also subject to regulation when removed from the container, may exhibit different properties than the original residues and may also be a wastewater which may be managed in a CWA tank system.
- Preliminary Findings
 - 40 CFR 262.17 (a)(5)(i) – Marking of Containers and Tanks
 - 7 containers in the Central Accumulation Area were not properly labeled.
 - 7 missing the words “Hazardous Waste
 - 4 also missing the accumulation start date.
 - 2 ISO containers used for D002 hazardous waste .
 - Both missing the words “Hazardous Waste.”
 - Also missing the accumulation start date.
 - Also missing an indication of the hazards associated with their contents.
 - Frac Tank
 - Currently unlabeled (waste determination is under review)
 - 40 CFR 262.17(a)(1)(v) – Failure to inspect hazardous waste container central accumulation areas.
 - Missing Weekly Inspection records for January 2023 and for the period between Feb 10, 2023, and June 15, 2023.
 - 40 CFR 262.11 - Waste Determinations
 - Oily water from the Frac tank is sent to Intergulf as a “recyclable” material. The facility needs to provide information on the end use of the material for additional review.
 - 40 CFR 262.17 (a)(5)(iv) Failure to close containers of hazardous waste
 - 2 ISO containers used for the accumulation of corrosive waste were open at the time of inspection.
 - 1 container in the container central accumulation area was open at the time of inspection.
 - Closure of tanks and containers
 - All three of the product storage tanks were open at the time of inspection.
 - The oily water frac tank was open at the time of inspection.
 - The vac box used for the separation of rust and scale from wash waters was left open after the pump was shut off.
- Departed Facility at approximately 3:30pm

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