

INSPECTION REPORT

Inspection Entry Date/Time	04/18/2024 1:00 (CT)			Announced: No
Inspection Exit Date/Time	04/18/2024 2:30 (CT)			Access: Granted
Regulatory Program	RCRA			
Type of Inspection	Focused Compliance Inspection (FCI)			
Facility or Site Name	VLS Environmental Solutions			
Facility/Site Identifier	LAR000088872			
Facility/Site Physical Address	7951 Dock Board Rd			
City, State, Zip Code	Sulphur, LA 70665			
County/Borough	Calcasieu Parish			
Generator Status	Large Quantity Generator (LQG)			
NAICS	None			
Type of Operation	VLS Environmental Solutions			
Geographic Coordinates	30.061693, -93.355957			
Additional Persons Participating in Inspection:				
Name	Title	Organization	Email	Phone
Elizabeth Pham	Inspector	EPA REGION 6	Pham.elizabeth@epa.gov	(214) 665-8354
Sandesh Thapa	Inspector	EPA REGION 6	Thapa.sandesh@epa.gov	(214) 665-2265
Anshul Paripati	Contractor	Eastern Research Group (ERG)	Anshul.Paripati@erg.com	(571) 535-1503
Lead Inspector:				
Cameron Tanaka				07/24/2024
	ERG	Cameron.Tanaka@erg.com	(703) 633-1632 ext. 11632	

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

Type of inspection: Focused Compliance Inspection (FCI)

The Port of Lake Charles and surrounding facilities were selected for inspection based on an Environmental Justice and Regional initiative to evaluate facilities at ports receiving or transporting Resource Conservation and Recovery Act (RCRA)-regulated hazardous wastes, and/or have an International Convention for the Prevention of Pollution from Ships (MARPOL) Annex V Certificate of Adequacy (COA) issued by the U.S. Coast Guard (USCG).

This report is based on information supplied by the facility representatives, inspector observations, port related facilities, and records including photographs taken (see Appendix 1), verbal or written statements made during or after the on-site inspection, and/or materials shown, demonstrated, or submitted to the EPA during or after the on-site inspection. In addition, information gathered prior to or after the inspection from a review of EPA, State, and public records may be included in this report.

Attendees

Title/Organization	Name	Phone	Email	Opening Conf.	Closing Conf.
Lead Inspector/ Contractor/ERG	Cameron Tanaka	(703) 633-1632 ext. 11632	Cameron.Tanaka@erg.com	Yes	No
RCRA Inspector/ Contractor/ERG	Anshul Paripati	(571) 535-1503	Anshul.Paripati@erg.com	Yes	Yes
Inspector/Enforcement Officer/EPA Region 6	Elizabeth Pham	(214) 665-8354	Pham.elizabeth@epa.gov	Yes	Yes
Inspector/Enforcement Officer/EPA Region 6	Sandesh Thapa	(214) 665-2265	Thapa.sandesh@epa.gov	Yes	Yes

Facility General Description

Tenant/Area	Inspection Date	Process Description	Area of Concern
VLS Environmental Solutions	04/18/24	VLS Environmental Solutions (VLS) provides barge cleaning, maintenance, and valve replacements, repairs, and greasing. Most of their hazardous and non-hazardous waste is generated from wash water from the barge tank cleaning. Most of their cleaning, however, is for petroleum product tanks and the wash water from that is sent for reclamation and sold. They do not have a MARPOL certificate for this location.	No

SECTION II – OBSERVATIONS – In order of inspection time.

Tenant: VLS Environmental Solutions			
Section: 2.1	Date: 04/18/24, 1:00 PM	Contains AOC: No	Contains CBI: No
Lead Inspector: Cameron Tanaka	Attendees: Randy Brook (no role listed) and Kenny Trahan (Environmental Manager)		
VLS Environmental Solutions (VLS) performs barge cleaning, maintenance, valve replacements, small repairs, and greasing for vessels. VLS is a large quantity generator of hazardous waste with EPA ID LAR000088872. According to a hazardous waste manifest, RCRA regulated wastes that they generate includes D001, D002, and D018 waste. The inspection team did not note any issues with this manifest. Most of their hazardous and non-hazardous waste is generated from wash water from the barge tank cleaning. Most of their cleaning, however, is for petroleum product tanks. The wash water for those operations is sent for reclamation and sold. For hazardous wastes generated, these generally include wash water from barges containing materials such as styrene monomers or chlorinated solvents. For barge cleaning, they strip and remove heels and residuals from the barges then clean the tanks with water. Their vacuum trucks remove this wash water and pump it into totes or frac tanks in their logistics area. For every barge that they are requested to clean, they verify all the SDS's for the materials on the barge and take samples before they perform any stripping or heel removal. Generally, VLS can resell the heels that they strip off barges but if the sampling results indicate that they cannot, those heels will be handled as hazardous waste. VLS generates non-hazardous waste including rust scale, oily trash, and greasing wastes. The inspection team viewed a non-hazardous waste manifest and found no issues. Their hazardous and non-hazardous wash water wastes are sent to injection wells. Hazardous wash water waste is sent to Circon and Texas Molecular and non-hazardous wash water waste is sent to US Ecology in Pasadena, TX. Other hazardous wastes, such as material that cannot be resold and hazardous sludge, is sent to third-party locations including Circon, Clean Harbors, Veolia, Tradebe, and US Ecology. They do not transport these wastes themselves. VLS does not generate or transfer used oil on site. VLS does not remove any garbage, e-waste, or other wastes from the vessels they clean, and they do not have universal waste generated or stored on site. They do not have a MARPOL COA for this location. Logistics Area The inspection team then performed a walk-through of VLS's logistics area where waste is stored. A tote that was about a quarter full of oil to be reclaimed and resold was observed (see Appendix 1 – Photos 1). The team also observed three hazardous waste ethanol wash water totes dated 3/26/24 that were closed, properly labeled, and in good condition (see Appendix 1 – Photos 2 and 3). Two of the totes were full and one of them was about half full. No apparent AOCs were observed by the inspection team the time of the inspection. A closing conference was conducted at approximately 2:20 PM with VLS personnel.			

SECTION III – RECORDS REVIEW

No RCRA regulated records reviewed during this focused onsite inspection.

SECTION IV – APPARENT AREAS OF CONCERN

The presentation of Area(s) of Concern does not constitute a formal compliance determination or violation. VLS did not have any Areas of Concern.

SECTION V – FOLLOW UP

Follow-Up

Any facility follow-up items are as discussed in each facility's observations in Section II. Documents or files provided by the facilities were transmitted via email and included responses to areas of concern or provision of documents requested.

Communication Log

During and after the inspection, additional information from VLS was not requested.

SECTION VI – LIST OF APPENDICES

Appendix 1. Photograph Log

APPENDIX 1.
PHOTOGRAPH LOG



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 1

Location: VLS Environmental Solutions		
City: Sulphur	County/Parish: Calcasieu	State: Louisiana



Photo File Name: DSCN7200

Date of Photo: 04/18/2024

Time of Photo: 13:07 hrs.

Photographer: Anshul Paripati

Description: View of a tote containing oil to be reclaimed and resold in VLS' logistics area.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 2

Location: VLS Environmental Solutions		
City: Sulphur	County/Parish: Calcasieu	State: Louisiana



Photo File Name: DSCN7201

Date of Photo: 04/18/2024

Time of Photo: 13:09 hrs.

Photographer: Anshul Paripati

Description: View of three hazardous waste ethanol wash water totes dated 3/26/24 in VLS' logistics area.

Photo No. 3

Location: VLS Environmental Solutions		
City: Sulphur	County/Parish: Calcasieu	State: Louisiana

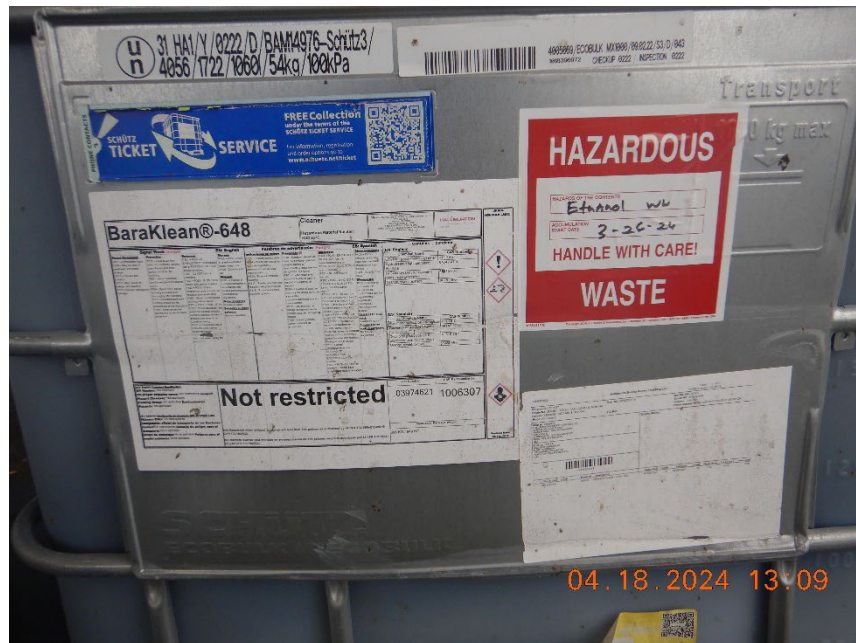


Photo File Name: DSCN7202

Date of Photo: 04/18/2024

Time of Photo: 13:09 hrs.

Photographer: Anshul Paripati

Description: Closeup view of a label on one of the three hazardous waste ethanol wash water totes dated 3/26/24 in VLS' logistics area.