EPA REGION 6 Enforcement Division

INSPECTION REPORT

Inspection Entry Date/Time	4/21/2025 11:54 AM (CT)	Announced: No (tenants and related facilities)
Inspection Exit Date/Time	4/21/2025 01:40 PM (CT)	Access: Granted
Regulatory Program	RCRA	
Type of Inspection	Compliance Evaluation Inspection (CEI)	
Facility or Site Name	Kinder Morgan Seven Oaks Terminal, LLC	
Facility/Site Identifier	LAD084670652	
Facility/Site Physical Address	106 Seven Oaks Blvd.	
City, State, Zip Code	Westwego, LA 70094	
County/Borough	Jefferson	
Generator Status	Large Quantity Generator (LQG)	
NAICS	493190	
Type of Operation	Kinder Morgan Seven Oaks (KMSO) is a bulk liquid storage terminal where barges, vessels, trucks, and railcars transport products in and out of the facility.	
Geographic Coordinates	29.9299, -90.1632	

Additional Persons Participating in Inspection:			
Name	Title	Organization	Email
Sandesh Thapa	Inspector	EPA REGION 6	Thapa.Sandesh@epa.gov
Joseph Watson	Contractor	Eastern Research Group (ERG)	Joe.Watson@erg.com
Lead Inspector:			
Vince Damiano		Vincent Damiano Digitally signed by Vincent Damiano Date: 2025.06.06 15:54:30 -04'00'	
	ERG	Vince.Damiano@erg.com	

SECTION I – INTRODUCTION

Site Entry and Purpose of the Inspection

The Port of New Orleans 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, 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	Sandesh Thapa	Thapa.Sandesh@epa.gov	Yes	Yes
RCRA Inspector/ Contractor/ERG	Joseph Watson	Joe.Watson@erg.com	Yes	Yes
EHS/KMSO	Barry Mader	Barry_mader@kindermorgan.com	Yes	Yes
Operations/KMSO	Eddie Cuevas	Eddie_cuevas@kindermorgan.com	Yes	Yes
EHS/KMSO	Matthew Santiago	Matthew_santiago@kindermorgan.com	Yes	Yes

Facility General Description

Tenant/Area	Inspection Date	Process Description	Area of Concern
Kinder Morgan Seven Oaks Terminal, LLC	4/21/25	KMSO is a bulk liquid storage terminal where barges, vessels, trucks, and railcars transport products in and out of the facility. The facility maintains a MARPOL Annex I, II, and V COA.	Yes

SECTION II – OBSERVATIONS

Facility: Kinder Morgan Seven Oaks Terminal, LLC			
Section: 2.1	**Date:** 4/21/25, 11:54 AM	**Contains AOC:** Yes	**Contains CBI:** No
Lead Inspector: Vince Damiano	**Attendees:** Barry Mader (EHS), Eddie Cuevas (Operations), and Matthew Santiago (EHS)		

KMSO, located in Westwego, LA, operates as a bulk liquid storage terminal on the Mississippi River. The facility stores and handles products such as vegetable oils, diesel distillates, and chemicals. KMSO has 17 storage tanks ranging in capacity from 15,00 barrels to 80,000 barrels. KMSO can load and unload products via trucks, railcars, and marine barges at its single dock berth. Tank cleaning and maintenance activities, such as painting and sand blasting, are conducted by third-party contractors who are responsible for managing any waste generated from those operations. KMSO maintains a MARPOL Annex I, II, and V COA. According to Mr. Mader, no waste is allowed to be transferred across the dock space. KMSO has two central accumulation areas (CAAs) and two satellite accumulation areas (SAAs) across the site. KMSO is registered with the EPA as a LQG of hazardous waste under EPA ID LAD084670652.

After the opening conference, the inspection team observed KMSO's CAAs, SAAs, universal waste storage area, and dock space. The inspection team first observed the South CAA. The inspection team observed one full 55-gallon drum containing hazardous aniline-contaminated PPE (see Appendix 1 – Photo 1). The drum had the label "haz" instead of "hazardous waste," and did not contain an indication of the hazard of the contents [***AOC #1*** *– KMSO did not label a container with the words "Hazardous Waste" and indication of the hazards of the contents– 40 CFR 262.17(a)(5)(i)*]. Upon identification of the AOC, facility representatives immediately relabeled the container to spell the correct phrase (see Appendix 1 – Photo 2). No other waste drums were observed in the south CAA. The inspection team also noted that there was no posted "No Smoking" sign at the South CAA, which may periodically store ignitable or reactive waste [***AOC #2*** *– KMSO did place a "No Smoking" sign where there is a hazard from ignitable or reactive waste – 40 CFR 262.17(a)(1)(vi)(B)*]. The inspection team then observed the South SAA, North SAA, North CAA, and universal waste storage area, which were all empty at the time of the inspection. The inspection team then observed the dock space. No areas of concern (AOCs) were noted at the dock.

The inspection team did not observe other AOCs at the time of the inspection. However, further EPA review may change or add to their potential AOCs. A closing conference was conducted at approximately 1:40 PM with KMSO personnel. The AOCs were communicated during the closing. Following the inspection on 4/24/2025, Mr. Mader sent a follow-up email in response to the AOCs observed during the inspection, including:

- Photos of No Smoking signs posted at both North and South CAAs (see Appendix 2).

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: Kinder Morgan Seven Oaks Terminal, LLC		
AOC #1 – KMSO did not label a container with the words "Hazardous Waste" and an indication of the hazards of the contents	**Citation:** 40 CFR 262.17(a)(5)(i)	Section: 2.1
AOC #2 – KMSO did place a "No Smoking" sign where there is a hazard from ignitable or reactive waste.	**Citation:** 40 CFR 262.17(a)(1)(vi)(B)	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. 4/24/25 KMSO email – Mr. Mader provided the inspection team with photos of corrections made towards AOCs observed.

SECTION VI – LIST OF APPENDICES

Appendix 1. Photograph Log

Appendix 2. 4/24/25 Response from KMSO

APPENDIX 1.
PHOTOGRAPH LOG

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Location: Kinder Morgan Seven Oaks Terminal		
City: Westwego	County/Parish: Jefferson	State: Louisiana

Photo No. 1

Photo File Name: DSCN7958
Date of Photo: 4/21/2025
Time of Photo: 1257 hrs.
Photographer: Vince Damiano
Description: View of a full 55-gallon drum of storing aniline-contaminated PPE, which was labeled as “Haz” in the South CAA.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Location: Kinder Morgan Seven Oaks Terminal		
City: Westwego	County/Parish: Jefferson	State: Louisiana

Photo No. 2

Photo File Name: DSCN7959
Date of Photo: 4/21/2025
Time of Photo: 1300 hrs.
Photographer: Vince Damiano
Description: View of a full 55-gallon drum of storing aniline-contaminated PPE, showing that the facility representatives added the words “Hazardous Waste.”

APPENDIX 2.
4/24/25 RESPONSE FROM KMSO

Outlook

RE: Follow-up from EPA Visit on 4/21/2025 (Seven Oaks)

From Mader, Barry <Barry_Mader@kindermorgan.com>
Date Thu 4/24/2025 1:36 PM
To Vince Damiano <Vince.Damiano@erg.com>; Santiago, Matthew <Matthew_Santiago@kindermorgan.com>
Cc Joe Watson <Joe.Watson@erg.com>; Thapa, Sandesh <Thapa.Sandesh@epa.gov>

2 attachments (3 MB)
DSCF0444.JPG; DSCF0427.JPG;

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

Vince,
In response to your email below, here's photographs of the posted No Smoking signs at each of the Hazardous Waste Storage Areas (North & South Yards) at the Seven Oaks Terminal. If you need any more information, please advise. Thank you.

Barry Mader
Specialist-Permitting Compliance Sr I
C: 504-239-2882 | O: 504-371-7241

KINDER MORGAN
Harvey & Seven Oaks Terminals
4400 River Road
Marrero, LA 70072

Do The Right Thing Every Day
CORE PRINCIPLES: *1) Safety Will Not Be Compromised 2) Environmentally Compliant and Responsible Operator 3) Ethics and Integrity 4) Commitment to Employees and Resources 5) Customer Service and Fiscal Responsibility 6) Quality Focus*

From: Vince Damiano <Vince.Damiano@erg.com>
Sent: Tuesday, April 22, 2025 10:16 PM
To: Mader, Barry <Barry_Mader@kindermorgan.com>; Santiago, Matthew <Matthew_Santiago@kindermorgan.com>
Cc: Joe Watson <Joe.Watson@erg.com>; Thapa, Sandesh <Thapa.Sandesh@epa.gov>
Subject: Follow-up from EPA Visit on 4/21/2025 (Seven Oaks)

You don't often get email from vince.damiano@erg.com. Learn why this is important
[This email message was received from the Internet and came from outside of Kinder Morgan.]

WARNING: EXTERNAL EMAIL: PROCEED WITH CAUTION.

Do not respond, click on links or open attachments unless you recognize the sender or know the content is safe.

Hello Barry and Matt,

I am following up with a list of items and notes from our inspection yesterday. 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 smoking signs were posted in the 90-day storage areas.

- Hazardous waste drum was improperly labeled (already fixed and documented)

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

KINDER MORGAN
HAZARDOUS WASTE STORAGE AREA
NO SMOKING
KM
4/2/25
2025. 4.22 6:46

NO SMOKING
2025. 4. 24 7:34