

INSPECTION REPORT

Inspection Entry Date/Time	07/17/2024 12:45 PM (CT)		Announced: No (tenants and related facilities)	
Inspection Exit Date/Time	07/17/2024 3:20 PM (CT)		Access: Granted	
Regulatory Program	RCRA			
Type of Inspection	Focused Compliance Inspection (FCI)			
Facility or Site Name	John W. Stone Oil Distributor LLC			
Facility/Site Identifier	LAD166293761			
Facility/Site Physical Address	452 First Street (Noted as 87 First Street on RCRAInfo)			
City, State, Zip Code	Gretna, LA 70053			
County/Borough	Jefferson Parish			
Generator Status	Used Oil Handler			
NAICS	42271			
Type of Operation	John W. Stone Oil Distributor LLC operates as a fuel distributor for barges and vessels.			
Geographic Coordinates	29.920657, -90.062017			
Additional Persons Participating in Inspection:				
Name	Title	Organization	Email	Phone
Dedriel Gardner	Inspector	EPA REGION 6	Gardner.Dedriel@epa.gov	(281) 983-2133
Joe Watson	Contractor	Eastern Research Group (ERG)	Joe.Watson@erg.com	(215) 891-6615
Lead Inspector:				
Vince Damiano				
	ERG		Vince.Damiano@erg.com	(703) 835-6281

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

The Port of New Orleans 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, 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	Vince Damiano	(703) 835-6281	Vince.Damiano@erg.com	Yes	Yes
RCRA Inspector/ Contractor/ERG	Joe Watson	(215) 891-6615	Joe.Watson@erg.com	Yes	Yes
Inspector/Enforcement Officer/EPA Region 6	Dedriel Gardner	(281) 983-2133	Gardner.Dedriel@epa.gov	Yes	Yes

Facility General Description

Tenant/Area	Inspection Date	Process Description	Area of Concern
John W. Stone Oil Distributor LLC	07/17/24	John W. Stone Oil Distributor LLC (Stone Oil) operates as a fuel distributor for barges and vessels. Fuels, such as diesel or heavy bunker fuel, are bought from refineries, blended in tanks at Stone Oil, and sold to customers on the river from their barges. Stone Oil also collects used oil from vessels, barges, and other customers who generate used oil. Stone Oil maintains a MARPOL COA.	Yes

SECTION II – OBSERVATIONS

Tenant: John W. Stone Oil Distributor LLC			
Section: 2.1	Date: 07/17/24, 12:45 PM	Contains AOC: Yes	Contains CBI: No
Lead Inspector: Vince Damiano	Attendees: Michael Hall (QSSE), Mitchell Waits (HSE), and George Forbes (Facility Manager)		
Stone Oil is located in Gretna, LA, and operates as a fuel distributor for barges and vessels. Fuels, such as diesel or heavy bunker fuel, are bought from refineries, blended in tanks at Stone Oil, and sold to customers on the river from their barges. The used oil is collected in one of their 42 barges, stored in a 300-gallon used oil tank on the barge, and brought back to Stone Oil once the tank is full. When the barge holding used oil docks at Stone Oil, the used oil is pumped to one of two onshore storage tanks prior to being sent off for recycling to Westside Oil Recovery Inc. in Slidell, LA. At the time of the inspection, only one onshore used oil tank was in operation (17,000-gallon holding capacity) while the other used oil storage tank (55,000-gallon storage capacity) is under repair. Stone Oil maintains a MARPOL COA, but the facility says they only accept “trash” such as food scraps, plastics, and paper from domestic vessels. Stone Oil is registered with the EPA as a used oil transporter, used oil transfer facility, and used oil processor (LAD166293761). Stone Oil representatives said they do not generate or receive RCRA-regulated hazardous waste. Stone Oil generates used oil, oily rags, oily filters, and universal waste from maintenance activities. Following the opening conference, the inspection team conducted a visual inspection of Stone Oil dock space, storage areas, used oil tanks, and maintenance shop. The inspection team first inspected Stone Oil’s dock space where barges S-40, S-48, and S-46 were docked. The inspection team observed the used oil tanks on board the barges where used oil is received and stored before it is pumped to the onshore used oil storage tank. Next, the inspection team moved to a storage area where an unlabeled 350-gallon metal tote was observed. The tote was approximately one-third full of used oil (see Appendix 1 – Photo 1) [AOC #1 – <i>Stone Oil did not clearly label containers used to store used oil with the words “Used Oil” – 40 CFR 279.54(f)(1)</i>]. In the same storage area, the inspection team also observed three full 55-gallon drums of used oil and oily rags which were unlabeled (see Appendix 1 – Photo 2) [see AOC #1]. While the inspection team was conducting the visual inspection, Stone Oil added a “Used Oil” label to the metal tote previously discussed (see Appendix 1 – Photo 3). Next, the inspection team observed Stone Oil’s onshore used oil storage tank, which has a 17,000-gallon storage capacity, as previously mentioned (see Appendix 1 – Photos 4 to 6). The inspection team observed that the storage tank did not contain a label indicating it was storing used oil [see AOC #1]. The inspection team also noticed a hole, approximately 1-inch in diameter, at the bottom of the tank which appeared to be from corrosion; no oil was seen leaking from the hole at the time of the inspection (see Appendix 1 – Photo 7) [AOC #2 – <i>Stone Oil stored used oil in a tank that was in poor condition – 40 CFR 279.54(b)(1)</i>]. The inspection team noticed there was no apparent secondary containment for the tank, but Stone Oil claimed the tank farm area is in a diked area, which acts as the secondary containment. The inspection team requested their secondary containment certification, which was provided following the inspection (see Appendix 2). About 100 meters Northwest from the tank area, the inspection team observed a roll-off container used to store used oil filters (see Appendix 1 – Photos 8 to 10). The roll-off container was storing undrained used oil filters but was not labeled as “Used Oil” [see AOC #1]. Most used filters were contained in double bags inside of the roll-off container, sufficiently acting as a secondary containment; however the inspection team observed one open bag of filters with its used oil filter contents falling out of the bag inside the roll-off container (see Appendix 1 – Photo 11) [AOC #3 – <i>Stone Oil stored used oil in containers not equipped with a</i>			

secondary containment system – 40 CFR 279.54(c)].

The inspection team moved to Stone Oil's maintenance shop located at 701 Madison St., Gretna, LA 70053 (non-notifier) to continue the visual inspection. The inspection team first observed an approximately half-full 300-gallon metal tote labeled as used oil (see Appendix 1 – Photos 12 and 13). The facility stated they add their spent antifreeze into the tote of used oil. The inspection team requested a waste determination on the mix of used oil and antifreeze [**AOC #4** – *Stone Oil did not make a hazardous waste determination. - 40 CFR 262.11*]. The inspection team also observed three unlabeled 5-gallon containers storing used oil filters that had not been drained or punctured, therefore the oil filters still contained used oil (see Appendix 1 – Photo 14) [see **AOC #1**]. The facility stated they recycle the used oil filters. Next, the inspection team observed eight lead-acid batteries that were not labeled as universal waste and for which Stone Oil was unable to confirm an accumulation start date on the lead-acid batteries they were managing as universal waste (see Appendix 1 – Photo 15) [**AOC #5** – *Stone Oil did not properly label used batteries being managed as universal waste – 40 CFR 273.14(a)*] and [**AOC #6** – *Stone Oil could not demonstrate the length of time universal waste had been accumulating – 40 CFR 273.15 (c)*].

A closing conference was conducted at approximately 3:20 PM with Stone Oil personnel. The AOCs were communicated; however, further EPA review may add to their potential AOCs. Follow-up documents were requested during the closing (see Appendices 2 – 8).

SECTION III – RECORDS REVIEW

Reviewed delivery confirmations for shipments of used oil. See Appendix 3 for examples requested following the inspection.

SECTION IV – AREAS OF CONCERN

The presentation of Area(s) of Concern does not constitute a formal compliance determination or violation.

Tenant: John W. Stone Oil Distributor LLC		
AOC #1 – Stone Oil did not clearly label containers used to store used oil with the words “Used Oil”	Citation: 40 CFR 279.54(f)(1)	Section: 2.1
AOC #2 – Stone Oil stored used oil in a tank that was in poor condition	Citation: 40 CFR 279.54(b)(1)	Section: 2.1
AOC #3 – Stone Oil stored used oil in containers not equipped with a secondary containment system	Citation: 40 CFR 279.54(c)	Section: 2.1
AOC #4 – Stone Oil did not make a hazardous waste determination.	Citation: 40 CFR 262.11	Section: 2.1
AOC #5 – Stone Oil did not properly label used batteries being managed as universal waste.	Citation: 40 CFR 273.14(a)	Section: 2.1
AOC #6 – Stone Oil could not demonstrate the length of time universal waste had been accumulating.	Citation: 40 CFR 273.15 (c)	Section: 2.1

SECTION V – FOLLOW UP

Documents or files provided by the facility as follow-up were transmitted via email and included responses to AOCs or provision of requested documents requested. See Appendices 2-8.

Communication Log

During and after the inspection, additional information was emailed to EPA including:

1. 08/01/24 Stone Oil email – Mitch Waits sent several photos and descriptions showing corrective actions implemented along with items requested from the inspection team at the facility based on the findings of the inspection.

SECTION VI – LIST OF APPENDICES

Appendix 1. Photograph Log

Appendix 2. Secondary Containment P.E. Certification

Appendix 3. Used Oil Ticket Examples

Appendix 4. MARPOL COA

Appendix 5. June 2024 Used Oil Sample Results

Appendix 6. Photographs of Corrected Labels

Appendix 7. Sample Results from the Used Oil and Antifreeze Mixture

Appendix 8. Follow-Up Response from 8/1/2024

APPENDIX 1.
PHOTOGRAPH LOG



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 1

Location: John W. Stone Oil Distributor LLC		
City: Gretna	County/Parish: Jefferson	State: Louisiana



Photo File Name: DSCN6709

Date of Photo: 07/17/2024

Time of Photo: 14:05 hrs.

Photographer: Vince Damiano

Description: View of 1/3 full 300-gallon tote of used oil unlabeled inside storage area.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 2

Location: John W. Stone Oil Distributor LLC		
City: Gretna	County/Parish: Jefferson	State: Louisiana



Photo File Name: DSCN6710

Date of Photo: 07/17/2024

Time of Photo: 14:11 hrs.

Photographer: Vince Damiano

Description: View of three 55-gallon drums of used oil unlabeled inside storage area.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 3

Location: John W. Stone Oil Distributor LLC		
City: Gretna	County/Parish: Jefferson	State: Louisiana



Photo File Name: DSCN6711

Date of Photo: 07/17/2024

Time of Photo: 14:13 hrs.

Photographer: Vince Damiano

Description: View of 1/3 full 300-gallon tote of used oil seen in Photo 1 after facility put a label on.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 4

Location: John W. Stone Oil Distributor LLC		
City: Gretna	County/Parish: Jefferson	State: Louisiana



Photo File Name: DSCN6712

Date of Photo: 07/17/2024

Time of Photo: 14:16 hrs.

Photographer: Vince Damiano

Description: Overview of unlabeled used oil tank.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 5

Location: John W. Stone Oil Distributor LLC		
City: Gretna	County/Parish: Jefferson	State: Louisiana



Photo File Name: DSCN6713

Date of Photo: 07/17/2024

Time of Photo: 14:16 hrs.

Photographer: Vince Damiano

Description: Overview of unlabeled used oil tank.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 6

Location: John W. Stone Oil Distributor LLC		
City: Gretna	County/Parish: Jefferson	State: Louisiana



Photo File Name: DSCN6714

Date of Photo: 07/17/2024

Time of Photo: 14:17 hrs.

Photographer: Vince Damiano

Description: Overview of unlabeled used oil tank.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 7

Location: John W. Stone Oil Distributor LLC		
City: Gretna	County/Parish: Jefferson	State: Louisiana



Photo File Name: DSCN6715

Date of Photo: 07/17/2024

Time of Photo: 14:17 hrs.

Photographer: Vince Damiano

Description: View of rusted hole on the bottom of used oil tank.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 8

Location: John W. Stone Oil Distributor LLC		
City: Gretna	County/Parish: Jefferson	State: Louisiana



Photo File Name: DSCN6716

Date of Photo: 07/17/2024

Time of Photo: 14:25 hrs.

Photographer: Vince Damiano

Description: View of roll-off container used to store used oil filters which was unlabeled.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 9

Location: John W. Stone Oil Distributor LLC		
City: Gretna	County/Parish: Jefferson	State: Louisiana



Photo File Name: DSCN6717

Date of Photo: 07/17/2024

Time of Photo: 14:25 hrs.

Photographer: Vince Damiano

Description: View inside roll-off container used to store used oil filters in double plastic bags.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 10

Location: John W. Stone Oil Distributor LLC		
City: Gretna	County/Parish: Jefferson	State: Louisiana



Photo File Name: DSCN6718

Date of Photo: 07/17/2024

Time of Photo: 14:26 hrs.

Photographer: Vince Damiano

Description: View of roll-off container used to store used oil filters which was unlabeled.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 11

Location: John W. Stone Oil Distributor LLC		
City: Gretna	County/Parish: Jefferson	State: Louisiana



Photo File Name: DSCN6719

Date of Photo: 07/17/2024

Time of Photo: 14:26 hrs.

Photographer: Vince Damiano

Description: View of red used oil filter seen outside of primary containment inside unlabeled roll-off container.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 12

Location: John W. Stone Oil Distributor LLC		
City: Gretna	County/Parish: Jefferson	State: Louisiana



Photo File Name: DSCN6720

Date of Photo: 07/17/2024

Time of Photo: 14:47 hrs.

Photographer: Vince Damiano

Description: View of ½ full used oil/antifreeze 300-gallon tote inside maintenance shop.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 13

Location: John W. Stone Oil Distributor LLC		
City: Gretna	County/Parish: Jefferson	State: Louisiana



Photo File Name: DSCN6721

Date of Photo: 07/17/2024

Time of Photo: 14:47 hrs.

Photographer: Vince Damiano

Description: View of ½ full used oil/antifreeze 300-gallon tote and empty oil containers inside maintenance shop.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 14

Location: John W. Stone Oil Distributor LLC		
City: Gretna	County/Parish: Jefferson	State: Louisiana



Photo File Name: DSCN6722

Date of Photo: 07/17/2024

Time of Photo: 14:48 hrs.

Photographer: Vince Damiano

Description: View of three unlabeled 5-gallon containers holding undrained used oil filters inside maintenance shop.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 15

Location: John W. Stone Oil Distributor LLC		
City: Gretna	County/Parish: Jefferson	State: Louisiana



Photo File Name: DSCN6723

Date of Photo: 07/17/2024

Time of Photo: 14:50 hrs.

Photographer: Vince Damiano

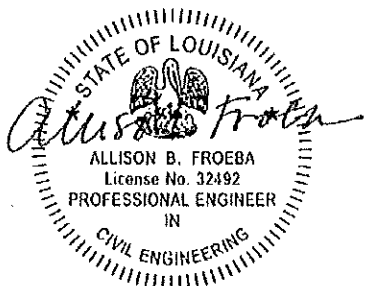
Description: View of eight unlabeled and undated universal waste batteries inside maintenance shop.

APPENDIX 2.
SECONDARY CONTAINMENT P.E. CERTIFICATION

ENGINEER CERTIFICATION

I hereby certify that I have examined this facility, and being familiar with the provisions of 40 CFR 112, attest that this SPCC Plan has been prepared in accordance with good engineering practices, including consideration of applicable industry standards and with the requirements of the SPCC rule providing that procedures for the required inspections and testing have been established and are adequate for this facility. All amendments to this document of a technical nature will result in a re-review and re-certification of this SPCC Plan.

Please note, any inadequacies determined to exist at this facility are documented on the following page, if applicable.

Engineer (Seal) 	Allison B. Froeba PRINTED NAME OF REGISTER PROFESSIONAL
Date: 5/31/21	SIGNATURE OF REGISTERED PROFESSIONAL
Job Number: 12-024-20-40 John W. Stone Oil Distributor, LLC Gretna Facility	PE License No.: 32492 State: LA LA COA No.: 5701

SECTION 2

DESIGN AND OPERATING INFORMATION

ONSHORE FACILITIES (EXCLUDING PRODUCTION FACILITIES)

- b. If the facility drainage from undiked areas does not flow into ponds, lagoons, or catchment basins, is the facility equipped with a diversion system to retain oil within the facility in the event of an uncontrolled discharge? [40 CFR 112.8(b)(4)]

N/A

- c. Are facility drainage waters continuously treated in more than one treatment unit and pump transfer if need? If yes, please answer the following questions. [40 CFR 112.8(b)(5)] [LAC 33:IX.907(G)(2)]

N/A

- i. Are two "lift" pumps available and at least one is permanently installed?

N/A

- ii. In the event of equipment failure or human error, is the facility drainage systems engineered to prevent a discharge in or upon the navigable waters of the United States, adjoining shorelines, and/or that may affect natural resources?

N/A

B. BULK STORAGE CONTAINERS [40 CFR 112.8(c)]

1. Are container materials and construction compatible with material stored and conditions of storage, such as pressure and temperature? [40 CFR 112.8(c)(1)]

YES

All container materials and construction are compatible to the materials stored and to the conditions of storage. Please refer to the Tank Tables on pages 2-5 to 2-6 for a list of storage tanks at this facility and their associated materials.

2. Except for mobile refuelers and other non-transportation-related tank trucks, construct all bulk storage tank installations with secondary containment to hold capacity of largest container and sufficient freeboard for precipitation. [40 CFR 112.8(c)(2)]

YES

This facility is equipped with earthen containment berms, concrete containment walls, metal containment pans, and concrete containment curbs. All secondary containment, including walls and floors, are sufficiently impervious to contain any discharged product. The volume of these secondary containment structures are described in Section 5, Attachment #2.

- a. Are diked areas sufficiently impervious to contain spills or discharged oil? [LAC 33:IX.907(F)(1)]

YES

This facility is equipped with earthen containment berms, concrete containment walls, metal containment pans, and concrete containment curbs. All secondary containment, including walls and floors, are sufficiently impervious to contain any discharged product. The facility operator will visually inspect the secondary containment structures on a daily basis and document any findings on a monthly basis. The facility operator will immediately repair any cracks, holes, or deterioration that would affect the imperviousness of the containment system. All documentation is kept electronically in the Gretna Facility office and sent to the John W. Stone Belle Chasse office.

- b. Are discharges to a drainage trench system safely confined in a facility catchment basin or holding pond?

N/A

This facility is not equipped with a catchment basin or holding pond.

3. Is there drainage of uncontaminated rainwater from diked areas into a storm drain or open water course? If yes, please answer the following questions. [40 CFR 112.8(c)(3)]

YES

Area "E", Area "F", "I", & "K", Area "H", and Area "J" are equipped with manual gate valves that when opened will discharge into the City of Gretna drainage system.

APPENDIX 3. USED OIL TICKET EXAMPLES

Delivery Confirmation



JOHN W. STONE OIL DISTRIBUTOR, L.L.C.
(504) 366-3401

Order No : 212998

Delivery Date : 07-04-2024 11:23

Customer No : 1191

Customer Name : Crowley Marine Service Inc

From Site : S40

Liberty

Belle Chasse Anchorage, [Port: Belle Chasse, LA 70037]

Quantity	Item	Description	Unit
174,565.00	1	Diesel #2, Ultra Low S, Dyed/Gallons HM - NA 1993, Ultra Low Sulfur Diesel, 3, PG III, Dyed, Nontaxable Use Only, Penalty for Taxable Use, (Max 15ppm Sulfur) Emergency Contact: 504-366-3401	Gallons
-1,411.00	M067B	Used Oil/Gallons Negative figures are used to validate our receipt of used oil for DEQ reporting. The extended dollar amount is your total due for this service. PO: CBW000437	Gallons

By accepting delivery of the goods or services, the purchaser agrees to pay: (i) the seller's invoice within 30 calendar days from the date of delivery; (ii) interest, compounding monthly, at the rate of Prime plus 1%, or the maximum amount permitted by law, on any and all overdue amounts; and (iii) any and all collection costs and expenses incurred by seller in connection with any overdue amounts from purchaser or the vessel and/or its owner, including but not limited to collection agency fees, reasonable attorney's fees, court costs and/or custodial fees. In addition, the purchaser: (i) represents and warrants that it is authorized by the owner of the receiving vessel to order necessities for and on the behalf of the receiving vessel; (ii) warrants that the goods or services provided by the seller are necessities to be used by the receiving vessel; (iii) represents and warrants that the seller will have a maritime lien on the vessel (whether under 46 USC 31342, the General Maritime Laws of the United States, or otherwise); (iv) will assign to the seller any and all lien rights that it has against the receiving vessel; (v) will indemnify and reimburse the seller for any and all costs and expenses incurred by the seller associated with any action that the seller undertakes to arrest or otherwise secure the vessel. Any disclaimer-of-lien stamps placed hereon, or on a delivery receipt, are hereby rejected by the seller. Any such stamp will have no effect whatsoever. The seller does not expressly reserves, any and all in rem rights.

Print Name: Liberty

Liberty

07/04/2024 11:38

Received By

Date

Delivery Confirmation



JOHN W. STONE OIL DISTRIBUTOR, L.L.C.

(504) 366-3401

415 First Street, Gretna, LA 70053

Destination Code : Used Oil (1)Westside Oil

Order No : 215403

Delivery Date : 07-16-2024 07:20

From Site : Belle Chasse

Quantity	Item	Description	Unit
4,935.00	M067B	Used Oil/Gallons Negative figures are used to validate our receipt of used oil for DEQ reporting. The extended dollar amount is your total due for this service.	Gallons

By accepting delivery of the goods or services, the purchaser agrees to pay: (i) the seller's invoice within 30 calendar days from the date of delivery; (ii) interest, compounding monthly at the Prime rate plus 1%, or the maximum amount permitted by law, on any and all overdue amounts; and (iii) any and all collection costs and expenses incurred by seller in connection with any overdue amounts from purchaser or the vessel and/or its owner, including but not limited to collection agency fees, reasonable attorney's fees, court costs and/or custodial fees. In addition, the purchaser: (i) represents and warrants that it is authorized by the owner of the receiving vessel to order necessities for and on the behalf of the receiving vessel; (ii) warrants that the goods or services provided by the seller are necessities to be used by the receiving vessel; (iii) represents and warrants that the seller will have a maritime lien on the vessel (whether under 46 USC 31342, the General Maritime Laws of the United States, or otherwise); (iv) will assign to the seller any and all lien rights that it has against the receiving vessel; (v) will indemnify and reimburse the seller for any and all costs and expenses incurred by the seller associated with any action that the seller undertakes to arrest or otherwise secure the vessel. Any disclaimer-of-lien stamps placed hereon, or on a delivery receipt, are hereby rejected by the seller. Any such stamp will have no effect whatsoever. The seller does not expressly reserves, any and all in rem rights.

Print Name: Westside Oil

Westside Oil

07/16/2024 07:50

Received By

Date

APPENDIX 4. MARPOL COA

United States Coast Guard
Certificate Of Adequacy
for
Reception Facility



This certifies that: Port of New Orleans has facilities adequate MARPOL I
to receive MARPOL II
MARPOL V

From oceangoing ships, as required by the International Convention for the Prevention of Pollution from Ships, 1973. As modified by the protocol of 1978 (MARPOL 73/78), The Act to Prevent Pollution from Ships, 33 USC 1901-1912 and associated U.S. Regulations in 33 CFR 158.

This certificate is issued pursuant to an application dated **24FEB2024** and an inspection dated **10JUL2024**, copies of which are attached, and part of this certificate. Each terminal listed in the application shall maintain a copy of this certificate available for inspection by Coast Guard personnel and the master, operator, agent, or owner of any ship using or intending to use this terminal.

Terminals and ports required to have an operations manual for oil transfer described in 33 CFR 154.300 shall attach a copy of this certificate thereto.

The terminal/port person in charge identified in the attached application shall notify the U.S. Coast Guard Captain of the Port (COTP) in writing after any of the reception facility information or terminal/port information identified in 33 CFR 158.165 changes.

The terminal/port owner, operator, or person in charge is liable for violations of the provisions of 33 CFR 158 and may be subject to the maximum penalty under 33 USC 1908, as adjusted for inflation and found at 33 CFR 27.3.

The terminal/port owner, operator, or person in charge shall ensure that the reception facility holds each state, local, and federal permit and license required by environmental laws and regulations concerning garbage, residues and mixtures containing oil or noxious liquid substances. This certificate certifies compliance with applicable sections of 33 CFR 158, but does not certify compliance with any other law or regulation.

This certificate is valid for a period of 5 years from the date issuance; or until suspended or revoked; or until 30 days after the operator cited on the certificate charges; at which time it shall be promptly returned to the U.S. Coast Guard COTP.

This Certificate Expires:

10JUL2029

5 years from date of issuance

[Signature]
Signature of COTP

10 JUL 24
Date

D. VELEZ COMMANDER, By direction

Typed Name of COTP

Date

Sector New Orleans

COTP Zone

Photo

The following waivers to this certificate are granted. The waivers shall be attached to and are part of this certificate.

Waiver Description (brief description)

Expire Date (if applicable)

Certificate of Adequacy Inspection Endorsement
(to be endorsed after each reception facility inspection)

[illegible]

APPENDIX 5. JUNE 2024 USED OIL SAMPLE RESULTS



Sample Summary

27-Jun-24 2:23 pm

2406270729	Batch:		Sampler:	KJ	Status:	Normal
	Project:	UMO	Collected:	6/27/2024	Time:	
	Location:	Supplier	Received:	6/27/2024	Time:	7:28
	Sample Type:	Pre-Qual	Started:	6/27/2024	Due:	
	Customer:	Westside	Completed:		Reported:	
	Cust. Sample:	3702-24	Invoice:		Invoiced:	
	PO:	vr24-1297				

Description: TK 22 1250bbls

Notes:

Document:

Conclusions: PQ PASS

Analysis	Result	Units	Spec.	Method	Date	Time	Tech/Lab
UMO Slate							
Ethylene Glycol	N/A*	vol%		VELM702 E	6/27/2024		kj
Kinematic Viscosity@40°C	26.9	cSt@40°C	32-120	D7279	6/27/2024		kj
Polychlorinated Biphenyls	< 2	mg/kg	<2	SW846-808	6/27/2024		kj
Halogens	97	ppm	<300	SW846-907	6/27/2024		kj
Water Vol	0.47	vol%	<5.0	D1744 (KF)	6/27/2024		kj
Sediment	.100	vol%	<1.5	D1796mod	6/27/2024		kj
Caustic Coagulation	Pass	N/A	pass	OH1I-0708	6/27/2024		kj
Specific Gravity @ 60°F	0.86440	degF	0.8654-0.89	D4052	6/27/2024		kj
API Gravity	32.2	API	55	D4052 (API)	6/27/2024		kj
Density, lbs/ga @60°F	7.2067	lbs/gal	report	D4052 (lbs/	6/27/2024		kj
Flash Point, CC	> 150	degF	>150	D3828	6/27/2024		kj
Sulfur	0.1737	wt%	<0.300	D5185mod	6/27/2024		kj
Arsenic	1.8	ppm	<5	D5185mod	6/27/2024		kj
Zinc	426.9	ppm	<1100	D5185mod	6/27/2024		kj
Phosphorus	386.9	ppm	<1100	D5185mod	6/27/2024		kj
Lead	3.2	ppm	<100	D5185mod	6/27/2024		kj
Cadmium	ND	ppm	<2	D5185mod	6/27/2024		kj
Iron	77.3	ppm	<150	D5185mod	6/27/2024		kj
Silicon	99.4	ppm	<150	D5185mod	6/27/2024		kj
Chromium	0.4	ppm	<10	D5185mod	6/27/2024		kj
Vanadium	ND	ppm	<10	D5185mod	6/27/2024		kj
Calcium	335.0	ppm	<3500	D5185mod	6/27/2024		kj
Sodium	3.6	ppm	<250	D5185mod	6/27/2024		kj

APPENDIX 6. PHOTOGRAPHS OF CORRECTED LABELS









APPENDIX 7. SAMPLE RESULTS FROM THE USED OIL AND ANTIFREEZE MIXTURE



Certificate of Analysis

John W. Stone Oil Dist. Inc. (JW Stone Oil)
George Forbes
P.O. Box 2010
Gretna
United States of America

Our Reference Number: US210-0027376
Lab Reference Number: 2024-GRET-000901
Customer Reference Number: 1180452

Customer Product Description: UMO	Sample ID: 2024-GRET-000901-001
Location: Gretna, LA, USA, Harvey, Louisiana, United States	Date Sampled: 19-Jul-2024
Sample Representing: 27376-1 REF#1180452 Composite	Date Submitted: 19-Jul-2024
Drawn By: Client	Date Tested: 19-Jul-2024

Method	Property	Result	Units
ASTM D7359	Chloride.	42.7	mg/kg
	Fluoride.	5.4	mg/kg
SW-846 9056A	SW846-907 Halogens	66	ppm

Results are only representative of the sample tested. All tests have been performed using the latest version unless otherwise indicated. This report shall not be reproduced except in full without written approval of Intertek. Report is subject to our standard Terms and Conditions which can be obtained at our website : <http://www.intertek.com/terms>
The sample was submitted for testing purposes. Intertek cannot accept liability for the representativeness of the sample.

Signed By: _____
Javier Mairena, Supervisor

Date: _____

Safety Data Sheet



SECTION 1 PRODUCT AND COMPANY IDENTIFICATION

Delo ELC Antifreeze/Coolant - Premixed 50/50

Product Use: Heavy Duty Coolant

Product Number(s): 227811

Company Identification

Chevron Products Company
a division of Chevron U.S.A. Inc.
6001 Bollinger Canyon Rd.
San Ramon, CA 94583
United States of America
www.chevronlubricants.com

Transportation Emergency Response

CHEMTREC: (800) 424-9300 or (703) 527-3887

Health Emergency

Chevron Emergency & Information Center: Located in the USA. International collect calls accepted. (800) 231-0623 or (510) 231-0623

Product Information

email : lubemsds@chevron.com

Product Information: 1 (800) 582-3835, LUBETEK@chevron.com

SECTION 2 HAZARDS IDENTIFICATION

CLASSIFICATION:

- Reproductive toxicant (developmental): Category 1B.
- Target organ toxicant (repeated exposure): Category 2.



Signal Word: Danger

Health Hazards:

- May damage the unborn child.
- May cause damage to organs (Kidney) through prolonged or repeated exposure.

PRECAUTIONARY STATEMENTS:

Prevention:

- Obtain special instructions before use.

- Do not handle until all safety precautions have been read and understood.
- Do not breathe dust/fume/gas/mist/vapours/spray.
- Use personal protective equipment as required.

Response:

- IF exposed or concerned: Get medical advice/attention.
- Get medical advice/attention if you feel unwell.

Storage:

- Store locked up.

Disposal:

- Dispose of contents/container in accordance with applicable local/regional/national/international regulations.

HAZARDS NOT OTHERWISE CLASSIFIED: Not Applicable

SECTION 3 COMPOSITION/ INFORMATION ON INGREDIENTS

COMPONENTS	CAS NUMBER	AMOUNT
Ethylene glycol	107-21-1	34 - < 80 %weight
Sodium 2-ethylhexanoate	19766-89-3	1 - 5 %weight
Tolyltriazole	29385-43-1	0.1 - < 1 %weight

SECTION 4 FIRST AID MEASURES

Description of first aid measures

Eye: No specific first aid measures are required. As a precaution, remove contact lenses, if worn, and flush eyes with water.

Skin: No specific first aid measures are required. As a precaution, remove clothing and shoes if contaminated. To remove the material from skin, use soap and water. Discard contaminated clothing and shoes or thoroughly clean before reuse.

Ingestion: If swallowed, get immediate medical attention. Do not induce vomiting. Never give anything by mouth to an unconscious person.

Inhalation: No specific first aid measures are required. If exposed to excessive levels of material in the air, move the exposed person to fresh air. Get medical attention if coughing or respiratory discomfort occurs.

Most important symptoms and effects, both acute and delayed

IMMEDIATE HEALTH EFFECTS

Eye: Not expected to cause prolonged or significant eye irritation.

Skin: Contact with the skin is not expected to cause prolonged or significant irritation. Contact with the skin is not expected to cause an allergic skin response. Not expected to be harmful to internal organs if absorbed through the skin.

Ingestion: May be harmful if swallowed.

Inhalation: Not expected to be harmful if inhaled. Breathing this material at concentrations above the recommended exposure limits may cause central nervous system effects. Central nervous system effects may include headache, dizziness, nausea, vomiting, weakness, loss of coordination, blurred vision, drowsiness, confusion, or disorientation. At extreme exposures, central nervous system effects may include respiratory depression, tremors or convulsions, loss of consciousness, coma or death.

DELAYED OR OTHER HEALTH EFFECTS:

Reproduction and Birth Defects: Contains material that may cause harm to the unborn child if swallowed based on animal data.

Target Organs: Contains material that may cause damage to the following organ(s) following repeated

inhalation at concentrations above the recommended exposure limit: Kidney See Section 11 for additional information. Risk depends on duration and level of exposure.

Indication of any immediate medical attention and special treatment needed Not Applicable

SECTION 5 FIRE FIGHTING MEASURES

EXTINGUISHING MEDIA: Dry Chemical, CO₂, Aqueous Film Forming Foam (AFFF) or alcohol resistant foam.

PROTECTION OF FIRE FIGHTERS:

Fire Fighting Instructions: This material will burn although it is not easily ignited. See Section 7 for proper handling and storage. For fires involving this material, do not enter any enclosed or confined fire space without proper protective equipment, including self-contained breathing apparatus.

Combustion Products: Highly dependent on combustion conditions. A complex mixture of airborne solids, liquids, and gases including carbon monoxide, carbon dioxide, and unidentified organic compounds will be evolved when this material undergoes combustion. Combustion may form oxides of: Sodium.

SECTION 6 ACCIDENTAL RELEASE MEASURES

Protective Measures: Eliminate all sources of ignition in vicinity of spilled material.

Spill Management: Stop the source of the release if you can do it without risk. Contain release to prevent further contamination of soil, surface water or groundwater. Clean up spill as soon as possible, observing precautions in Exposure Controls/Personal Protection. Use appropriate techniques such as applying non-combustible absorbent materials or pumping. Where feasible and appropriate, remove contaminated soil. Place contaminated materials in disposable containers and dispose of in a manner consistent with applicable regulations.

Reporting: Report spills to local authorities and/or the U.S. Coast Guard's National Response Center at (800) 424-8802 as appropriate or required.

SECTION 7 HANDLING AND STORAGE

General Handling Information: Do not taste or swallow antifreeze or solution. Keep out of the reach of children and animals.

Precautionary Measures: Do not get in eyes, on skin, or on clothing. Do not taste or swallow. Do not breathe vapor or fumes. Wash thoroughly after handling. Keep out of the reach of children.

Static Hazard: Electrostatic charge may accumulate and create a hazardous condition when handling this material. To minimize this hazard, bonding and grounding may be necessary but may not, by themselves, be sufficient. Review all operations which have the potential of generating and accumulating an electrostatic charge and/or a flammable atmosphere (including tank and container filling, splash filling, tank cleaning, sampling, gauging, switch loading, filtering, mixing, agitation, and vacuum truck operations) and use appropriate mitigating procedures.

Container Warnings: Container is not designed to contain pressure. Do not use pressure to empty container or it may rupture with explosive force. Empty containers retain product residue (solid, liquid, and/or vapor) and can be dangerous. Do not pressurize, cut, weld, braze, solder, drill, grind, or expose such containers to heat, flame, sparks, static electricity, or other sources of ignition. They may explode and cause injury or death. Empty containers should be completely drained, properly closed, and promptly returned to a drum reconditioner or disposed of properly.

General Storage Information: Do not store in open or unlabeled containers.

SECTION 8 EXPOSURE CONTROLS/PERSONAL PROTECTION

GENERAL CONSIDERATIONS:

Consider the potential hazards of this material (see Section 2), applicable exposure limits, job activities, and other substances in the workplace when designing engineering controls and selecting personal protective equipment (PPE). If engineering controls or work practices are not adequate to prevent exposure to harmful levels of this material, refer to PPE information below.

Factors that affect PPE include, but are not limited to: properties of the chemical, other chemicals which may contact the same PPE, physical requirements (fit & sizing, cut/puncture protection, dexterity, thermal protection, etc.), and potential allergic reactions to the PPE material. It is the responsibility of the user to read and understand all instructions and limitations supplied with the equipment since protection is usually provided for a limited time or under certain circumstances. Refer to appropriate CEN standards.

ENGINEERING CONTROLS:

Use general ventilation, local exhaust ventilation, or a combination of both.

PERSONAL PROTECTIVE EQUIPMENT

Eye/Face Protection: Wear protective equipment to prevent eye contact. Selection of protective equipment may include safety glasses, chemical goggles, face shields, or a combination depending on the work operations conducted.

Skin Protection: Wear chemical personal protective equipment (PPE) to prevent skin contact. Selection of chemical protective clothing should be performed by an Occupational Hygienist or Safety Professional and be based upon applicable standards (ASTM F739 or EN 374). Using chemical PPE depends upon operations conducted and may include chemical gloves, boots, chemical apron, chemical suit, and complete facial protection. **Refer to PPE manufacturers to obtain breakthrough time information to determine how long PPE can be used before it needs to be replaced.** Unless specific glove manufacturer data indicates otherwise, the below table is based upon available industry data to assist in the glove selection process and is intended to be used as reference only.

Chemical Glove Material	Thickness (mm)	Typical Breakthrough Time (minutes)
Butyl	0.7	120
Neoprene	0.61	120
Nitrile	0.8	120
Polyvinyl Chloride (PVC)	1.1	120
Viton Butyl	0.3	120

Respiratory Protection: Determine if airborne concentrations are below the recommended occupational exposure limits for jurisdiction of use. If airborne concentrations are above the acceptable limits, wear an approved respirator that provides adequate protection from this material, such as: Air-Purifying Respirator for Organic Vapors, Dusts and Mists.

Use a positive pressure air-supplying respirator in circumstances where air-purifying respirators may not provide adequate protection.

Occupational Exposure Limits:

Component	Agency	Form	TWA	STEL	Ceiling	Notation
Ethylene glycol	ACGIH	--	0.01 ppm	--	--	Skin
Ethylene glycol	ACGIH	Inhalable aerosol	--	10 mg/m3	--	--
Ethylene glycol	ACGIH	Vapor	25 ppm	50 ppm	--	--

		fraction				
--	--	----------	--	--	--	--

Consult local authorities for appropriate values.

SECTION 9 PHYSICAL AND CHEMICAL PROPERTIES

Attention: the data below are typical values and do not constitute a specification.

Color: Red

Physical State: Liquid

Odor: Faint or Mild

Odor Threshold: No data available

pH: 8.0 - 8.6; 67%volume @ 20°C (solution in water)

Vapor Pressure: No data available

Relative Vapor Density: 2.1

Initial Boiling Point: 109°C (228.2°F)

Solubility: Soluble in water.

Freezing Point: -37°C (-34.6°F) (Max)

Melting Point: Not Applicable

Specific Gravity: 1.06 - 1.09

Particle Characteristics: Not applicable

Density: 1.071 kg/l @ 15°C (59°F) (Min)

Kinematic Viscosity: No data available

Coefficient of Therm. Expansion / °F: No data available

Evaporation Rate: No data available

Decomposition temperature: No data available

Partition coefficient n-octanol/water (logarithmic value): No data available

FLAMMABLE PROPERTIES:

Flammability (solid, gas): Not Applicable

Flashpoint: Not Applicable

Autoignition: No data available

Flammability (Explosive) Limits (% by volume in air): Lower: Not Applicable Upper: Not Applicable

SECTION 10 STABILITY AND REACTIVITY

Reactivity: May react with strong acids or strong oxidizing agents, such as chlorates, nitrates, peroxides, etc.

Chemical Stability: This material is considered stable under normal ambient and anticipated storage and handling conditions of temperature and pressure.

Incompatibility With Other Materials: Not applicable

Hazardous Decomposition Products: Aldehydes (Elevated temperatures), Ketones (Elevated temperatures)

Hazardous Polymerization: Hazardous polymerization will not occur.

SECTION 11 TOXICOLOGICAL INFORMATION

Information on toxicological effects

Serious Eye Damage/Irritation: The material is not considered an eye irritant. The product has not been tested. The statement is based on evaluation of data for similar materials or product components.

Skin Corrosion/Irritation: The material is not considered a skin irritant. The product has not been tested.

The statement is based on evaluation of data for similar materials or product components.

Skin Sensitization: The material is not considered a skin sensitizer. The product has not been tested. The statement is based on evaluation of data for similar materials or product components.

Acute Dermal Toxicity: The material is not considered a dermal toxicant. The product has not been tested. The statement is based on evaluation of data for similar materials or product components.

Acute Oral Toxicity: The material is not considered an oral toxicant. The product has not been tested. The statement is based on evaluation of data for similar materials or product components.

Acute Inhalation Toxicity: The material is not considered an inhalation toxicant. The product has not been tested. The statement is based on evaluation of data for similar materials or product components.

Acute Toxicity Estimate: Not Determined

Germ Cell Mutagenicity: The material is not considered a mutagen. The product has not been tested. The statement is based on evaluation of data for similar materials or product components.

Carcinogenicity: The material is not considered a carcinogen. The product has not been tested. The statement is based on evaluation of data for similar materials or product components.

Reproductive Toxicity: This material may damage the unborn child. The product has not been tested. The statement is based on evaluation of data for similar materials or product components.

Specific Target Organ Toxicity - Single Exposure: The material is not considered a target organ toxicant (single exposure). The product has not been tested. The statement is based on evaluation of data for similar materials or product components.

Specific Target Organ Toxicity - Repeated Exposure: This material may cause damage to organs through prolonged or repeated exposure. The product has not been tested. The statement is based on evaluation of data for similar materials or product components.

Aspiration Hazard: The material is not considered an aspiration hazard.

ADDITIONAL TOXICOLOGY INFORMATION:

This product contains ethylene glycol (EG). The toxicity of EG via inhalation or skin contact is expected to be slight at room temperature. The estimated oral lethal dose is about 100 cc (3.3 oz.) for an adult human. Ethylene glycol is oxidized to oxalic acid which results in the deposition of calcium oxalate crystals mainly in the brain and kidneys. Early signs and symptoms of EG poisoning may resemble those of alcohol intoxication. Later, the victim may experience nausea, vomiting, weakness, abdominal and muscle pain, difficulty in breathing and decreased urine output. When EG was heated above the boiling point of water, vapors formed which reportedly caused unconsciousness, increased lymphocyte count, and a rapid, jerky movement of the eyes in persons chronically exposed. When EG was administered orally to pregnant rats and mice, there was an increase in fetal deaths and birth defects. Some of these effects occurred at doses that had no toxic effects on the mothers. We are not aware of any reports that EG causes reproductive toxicity in human beings.

2-Ethylhexanoic acid (2-EXA) caused an increase in liver size and enzyme levels when repeatedly administered to rats via the diet. When administered to pregnant rats by gavage or in drinking water, 2-EXA caused teratogenicity (birth defects) and delayed postnatal development of the pups. Additionally, 2-EXA impaired female fertility in rats. Birth defects were seen in the offspring of mice who were administered sodium 2-ethylhexanoate via intraperitoneal injection during pregnancy.

SECTION 12 ECOLOGICAL INFORMATION

ECOTOXICITY

This material is not expected to be harmful to aquatic organisms.

The product has not been tested. The statement has been derived from the properties of the individual components.

MOBILITY

No data available.

PERSISTENCE AND DEGRADABILITY

This material is expected to be readily biodegradable. The product has not been tested. The statement has been derived from the properties of the individual components.

POTENTIAL TO BIOACCUMULATE

Bioconcentration Factor: No data available.

Partition coefficient n-octanol/water (logarithmic value): No data available

SECTION 13 DISPOSAL CONSIDERATIONS

Use material for its intended purpose or recycle if possible. This material, if it must be discarded, may meet the criteria of a hazardous waste as defined by international, country, or local laws and regulations.

SECTION 14 TRANSPORT INFORMATION

The description shown may not apply to all shipping situations. Consult 49CFR, or appropriate Dangerous Goods Regulations, for additional description requirements (e.g., technical name) and mode-specific or quantity-specific shipping requirements.

DOT Shipping Description: PROPRIETARY ANTIFREEZE PREPARATION IN NON-BULK PACKAGING; NOT REGULATED FOR TRANSPORT UNDER 49 CFR

Additional Information: Bulk shipments containing a reportable quantity (RQ, 5000 pounds or more) of ethylene glycol in a single packaging are transported as hazardous material. The shipping description is: UN3082, ENVIRONMENTALLY HAZARDOUS SUBSTANCE, LIQUID, N.O.S. (ETHYLENE GLYCOL CONTAINS BITTERANT), 9, III, RQ (ETHYLENE GLYCOL)

IMO/IMDG Shipping Description: NOT REGULATED AS DANGEROUS GOODS FOR TRANSPORTATION UNDER THE IMDG CODE

ICAO/IATA Shipping Description: NOT REGULATED AS DANGEROUS GOODS FOR TRANSPORTATION UNDER ICAO TI OR IATA DGR

Transport in bulk according to Annex II of MARPOL 73/78 and the IBC code:

Not applicable

SECTION 15 REGULATORY INFORMATION**EPCRA 311/312 CATEGORIES:**

Reproductive toxicity

Specific target organ toxicity (single or repeated exposure)

REGULATORY LISTS SEARCHED:

01-1=IARC Group 1

05=MA RTK

01-2A=IARC Group 2A	06=NJ RTK
01-2B=IARC Group 2B	07=PA RTK
02=NTP Carcinogen	08-1=TSCA 5(e)
03=EPCRA 313	08-2=TSCA 12(b)
04=CA Proposition 65	

The following components of this material are found on the regulatory lists indicated.
Ethylene glycol 03, 04, 05, 07

CHEMICAL INVENTORIES:

All components comply with the following chemical inventory requirements: AIIIC (Australia), DSL (Canada), EINECS (European Union), ENCS (Japan), IECSC (China), KECI (Korea), NZIoC (New Zealand), PICCS (Philippines), TCSI (Taiwan), TSCA (United States).

NEW JERSEY RTK CLASSIFICATION:

Under the New Jersey Right-to-Know Act L. 1983 Chapter 315 N.J.S.A. 34:5A-1 et. seq., the product is to be identified as follows: Refer to components listed in Section 3.

SECTION 16 OTHER INFORMATION

NFPA RATINGS: Health: 1 Flammability: 1 Reactivity: 0

HMIS RATINGS: Health: 1* Flammability: 1 Reactivity: 0
(0-Least, 1-Slight, 2-Moderate, 3-High, 4-Extreme, PPE:- Personal Protection Equipment Index recommendation, *- Chronic Effect Indicator). These values are obtained using the guidelines or published evaluations prepared by the National Fire Protection Association (NFPA) or the National Paint and Coating Association (for HMIS ratings).

REVISION STATEMENT:

SECTION 02 - Hazard Statements information was modified.
SECTION 02 - Health Classification information was modified.
SECTION 02 - Signal Word information was modified.
SECTION 03 - Composition information was modified.
SECTION 05 - Fire Fighters Protection Measures information was modified.
SECTION 08 - Occupational Exposure Limit Table information was modified.
SECTION 08 - Skin Protection information was modified.
SECTION 09 - Physical/Chemical Properties information was modified.
SECTION 10 - Hazardous Decomposition Products information was modified.
SECTION 11 - Reproductive Toxicity information was modified.
SECTION 11 - Toxicological Information information was modified.
SECTION 12 - Ecological Information information was added.
SECTION 12 - Ecological Information information was deleted.

Revision Date: March 04, 2024

ABBREVIATIONS THAT MAY HAVE BEEN USED IN THIS DOCUMENT:

TLV - Threshold Limit Value	TWA - Time Weighted Average
STEL - Short-term Exposure Limit	PEL - Permissible Exposure Limit
GHS - Globally Harmonized System	CAS - Chemical Abstract Service Number
ACGIH - American Conference of Governmental	IMO/IMDG - International Maritime Dangerous Goods

Industrial Hygienists	Code
API - American Petroleum Institute	SDS - Safety Data Sheet
HMIS - Hazardous Materials Information System	NFPA - National Fire Protection Association (USA)
DOT - Department of Transportation (USA)	NTP - National Toxicology Program (USA)
IARC - International Agency for Research on Cancer	OSHA - Occupational Safety and Health Administration
NCEL - New Chemical Exposure Limit	EPA - Environmental Protection Agency
SCBA - Self-Contained Breathing Apparatus	PNOS - Particles Not Otherwise Specified

Prepared according to the 29 CFR 1910.1200 (2012) by Chevron.

The above information is based on the data of which we are aware and is believed to be correct as of the date hereof. Since this information may be applied under conditions beyond our control and with which we may be unfamiliar and since data made available subsequent to the date hereof may suggest modifications of the information, we do not assume any responsibility for the results of its use. This information is furnished upon condition that the person receiving it shall make his own determination of the suitability of the material for his particular purpose.

APPENDIX 8. FOLLOW-UP RESPONSE FROM 8/1/2024

RE: Follow-up From EPA Visit on 7/17

Mitch Waits <mwaits@stoneoil.com>

Thu 8/1/2024 11:37 AM

To: Vince Damiano <Vince.Damiano@erg.com>; George Forbes <gforbes@stoneoil.com>; Michael Hall <mhall@stoneoil.com>
Cc: Joe Watson <Joe.Watson@erg.com>; Gardner, Dedriel <Gardner.Dedriel@epa.gov>; Russell Rawls <rrawls@stoneoil.com>;
Tony Odak <todak@stoneoil.com>

 10 attachments (2 MB)

COA 2024.pdf; Used Oil Ticket.pdf; SPCC Plan Certification.pdf; 3702-24.pdf; Used Oil Containers 1.heic; Used Oil Containers 2.heic; Used Oil Containers 3.heic; Battery Storage area.HEIC; SDS Antifreeze.pdf; 27376-1 REF#1180452 Final.pdf;

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

Good Morning,

Below and attached you will find the responses to the e-mail on 7/17/2024 with the subject line Follow-up From EPA Visit on 7/17. Below in red you will find the response to each item requested and initial areas of concern. Most of the responses will direct you to the attached correlating document that is in this e-mail. Should you have any questions, please feel free to contact me at the below listed information.

Respectfully,

Mitch Waits
Director of QHSS&E
Office: 1-504-376-2908
Cell: 1-985-209-8791

From: Vince Damiano <Vince.Damiano@erg.com>

Sent: Wednesday, July 17, 2024 8:54 PM

To: George Forbes <gforbes@stoneoil.com>; Mitch Waits <mwaits@stoneoil.com>; Michael Hall <mhall@stoneoil.com>

Cc: Joe Watson <Joe.Watson@erg.com>; Gardner, Dedriel <Gardner.Dedriel@epa.gov>

Subject: Follow-up From EPA Visit on 7/17

Some people who received this message don't often get email from vince.damiano@erg.com. [Learn why this is important](#)

CAUTION: This email originated from outside the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hello All,

I am following up with a list of items and notes from our inspection today. Below are initial Areas of Concern and items requested:

- Please confirm your RCRA EPA ID Number and generator status, if you have one [LAG480542](#)
- Please confirm you have a MARPOL Certificate of Adequacy [See Document COA 2024 attached](#),
- Examples of tracking documents for receiving used oil from vessels [See document Used Oil Ticket attached](#)
- Secondary Containment P.E. Certification for used oil tank. [See document SPCC Plan Certification attached0](#)
- Any documents or results related to testing used oil you receive as a transfer/transporter facility. Please refer to 40 CFR 279 Subpart E for requirements. [See document 3702-24 attached](#)

Initial Areas of Concern. You may follow-up with pictures, write-ups, sample results, or however you see fit.

- Unlabeled used oil on tank, totes, roll-off dumpsters, and containers. [Lables were affixed to the mentioned the day of the inspection. See Picture labeled Used Oil Containers 1, 2, and 3 attached](#)
- Unlabeled Universal waste batteries. Please provide an accumulation start date if possible. [5/16/2024 and see picture labeled Battery Storage area attached](#)
- Waste Determination - mixing universal waste anti-freeze with used oil. Please provide a waste determination for anti-freeze before it is placed in used oil and a waste determination after it is placed in used oil. Also, if you can provide a quantity amount of how much anti-freeze has typically been added to the used oil tote on a monthly basis. [Approximately 1 -2 gallons a month, if vehicle maintenance requires, See documents labeled SDS Antifreeze, and labeled 27376-1 REF#1180452 Final.](#)
- Failure to produce rebuttable presumption for used oil. [John W Stone only receives vessel slops, used oil filters, household trash. The company does not receive hazardous material from these vessels at the facility. 297.10 \(h\)](#)

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: (570) 956-1468

Vince.Damiano@erg.com