

INSPECTION REPORT

Inspection Entry Date/Time	06/25/2024 01:10 PM (CT)			Announced: No (tenants and related facilities)
Inspection Exit Date/Time	06/25/2024 03:10 PM (CT)			Access: Granted
Regulatory Program	RCRA			
Type of Inspection	Focused Compliance Inspection (FCI)			
Facility or Site Name	Vopak Industrial Infrastructure Americas Freeport, LLC			
Facility/Site Identifier	TXR000085527			
Facility/Site Physical Address	2301 Brazosport Blvd, Building A-2813			
City, State, Zip Code	Freeport, TX 77541			
County/Borough	Brazoria County			
Generator Status	Large Quantity Generator (LQG)			
NAICS	493190			
Type of Operation	Vopak operates as a terminal for product transfers between ships, vessels, rails, and barges for chemical products			
Geographic Coordinates	28.9825, -95.352777			
Additional Persons Participating in Inspection:				
Name	Title	Organization	Email	Phone
Elizabeth Pham	Inspector	EPA REGION 6	Pham.Elizabeth@epa.gov	(214) 665-8354
Erin Young-Dahl	Inspector	EPA REGION 6	YoungDahl.Erin@epa.gov	(214) 665-3166
Neil Rapp	Contractor	Eastern Research Group (ERG)	Neil.Rapp@erg.com	(480) 450-6517
Lead Inspector:				
Vince Damiano				
	ERG	Vince.Damiano@erg.com	(703) 633-1732	

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

The Port Freeport 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	Vince Damiano	(703) 633-1732	Vince.Damiano@erg.com	Yes	Yes
RCRA Inspector/ Contractor/ERG	Neil Rapp	(480) 450-6517	Neil.Rapp@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	Erin Young-Dahl	(214) 665-3166	YoungDahl.Erin@epa.gov	Yes	Yes

Facility General Description

Tenant/Area	Inspection Date	Process Description	Area of Concern
Vopak Industrial Infrastructure Americas Freeport, LLC	06/25/24	Vopak Industrial Infrastructure Americas Freeport, LLC (Vopak) is a terminal facility loading and unloading specialty chemicals. Dow maintains ownership of the facility's MARPOL COA because they own the facility's dock.	No

SECTION II – OBSERVATIONS

Tenant: Vopak Industrial Infrastructure Americas Freeport, LLC			
Section: 2.1	Date: 06/25/24, 1:10 PM	Contains AOC: No	Contains CBI: No
Lead Inspector: Vince Damiano	Attendees: Clifton Ferrell (SHEQ Director), Sally Perry (Environmental Engineer), Felix Saavedra (Tech Manager), Bas Kleijn (Terminal Manager), Mark Wade (Operations Manager), Joe Garcia (Waste Coordinator)		
Vopak is located just North of Port Freeport and operates as a terminal for unloading and loading products from vessels, barges, and rail cars. Vopak is not a tenant of Port Freeport. The products being moved consist of hydrocarbons, glycols, caustics, Pygas, naphtha, and other specialty chemicals. Vopak will occasionally receive bulk raw product, containerize it, and ship it off to customers. Vopak is situated next to a DOW plant where products are transferred to Vopak’s storage tanks via pipeline. Vopak will store the products in their storage tanks for customers and conduct the loading and unloading operations for transportation. Vopak also has DOW contractors conducting day-to-day operations including waste management. DOW maintains the MARPOL COA for the six dock spaces Vopak operates on. Vopak is registered with EPA as an LQG (TXR000085527). Ms. Perry described that the waste streams generated mainly are from small leaks/spills, line flushings, tank cleanings, off spec product, and used oil. Ms. Perry stated she performs the waste profiling and reprofiling as needed, but most material stored on site does not change. Most of the hazardous waste is co-generated with Vopak’s customer but is manifested under Vopak. The hazardous waste is mostly sent to the neighboring DOW plant for disposal, but some will be manifested to other disposal facilities based on the nature of the waste. The inspection team began a visual inspection at Vopak’s dock spaces at approximately 2:00 PM. The first dock observed was A-8 Dock. There was a satellite accumulation drum at the dock space, but it was empty. Mr. Garcia, Waste Coordinator, stated he brings the waste from the satellite drums at each dock space to the central accumulation area every morning. Next, the inspection team observed the “1660 Area” which serves as Vopak’s 90-day accumulation area. The inspection team observed four containers of hazardous waste with a D008 waste code. All containers were properly labeled. The inspection team also observed the roll-off area where hazardous waste can be stored for up to 90-days in roll-off containers. One roll-off with hazardous waste sludge was found; the container was properly sealed and labeled. No apparent areas of concern were noted from the visual inspection. Following the visual inspection, a closing conference was held with Vopak personnel at 3:10 PM.			

SECTION III – RECORDS REVIEW

No RCRA-regulated records were reviewed during this focused onsite inspection.

SECTION IV – AREAS OF CONCERN

Not Applicable

SECTION V – FOLLOW UP

Follow-Up

Not Applicable