

INSPECTION REPORT

|                                                        |                                                                                     |                              |                          |                |
|--------------------------------------------------------|-------------------------------------------------------------------------------------|------------------------------|--------------------------|----------------|
| <b>Inspection Entry Date/Time</b>                      | 4/18/2024 02:45 PM (CT)                                                             | Announced: No                |                          |                |
| <b>Inspection Exit Date/Time</b>                       | 4/18/2024 03:50 PM (CT) Closing Conference                                          | Access: Granted              |                          |                |
| <b>Regulatory Program</b>                              | RCRA                                                                                |                              |                          |                |
| <b>Type of Inspection</b>                              | Focused Compliance Inspection (FCI)                                                 |                              |                          |                |
|                                                        |                                                                                     |                              |                          |                |
| <b>Facility or Site Name</b>                           | ES&H                                                                                |                              |                          |                |
| <b>Facility/Site Identifier</b>                        | LAR000037069                                                                        |                              |                          |                |
| <b>Facility/Site Physical Address</b>                  | 21148 LA Route 1                                                                    |                              |                          |                |
| <b>City, State, Zip Code</b>                           | Golden Meadow, LA 70357                                                             |                              |                          |                |
| <b>County/Borough</b>                                  | Lafourche Parish                                                                    |                              |                          |                |
| <b>Generator Status</b>                                | Transporter                                                                         |                              |                          |                |
| <b>NAICS</b>                                           | <u>488510</u>                                                                       |                              |                          |                |
| <b>+Type of Operation</b>                              | Freight Transportation Arrangement                                                  |                              |                          |                |
| <b>Geographic Coordinates</b>                          | 29.34477, -90.24761                                                                 |                              |                          |                |
| <b>Mailing Address/Secondary Address</b>               | 1730 Coteau Rd (main offices)                                                       |                              |                          |                |
| <b>City, State, Zip Code</b>                           | Houma, LA 70364                                                                     |                              |                          |                |
|                                                        |                                                                                     |                              |                          |                |
| <b>Permit Number (If Applicable)</b>                   | Not Applicable                                                                      |                              |                          |                |
|                                                        |                                                                                     |                              |                          |                |
| <b>Additional Persons Participating in Inspection:</b> |                                                                                     |                              |                          |                |
| <b>Name</b>                                            | <b>Title</b>                                                                        | <b>Organization</b>          | <b>Email</b>             | <b>Phone</b>   |
| Joyce Johnson                                          | Inspector                                                                           | EPA Region 6                 | Johnson.Joyce-r6@epa.gov | (214) 665-8548 |
| Dedriel Gardner                                        | Inspector                                                                           | EPA Region 6                 | Gardner.Dedriel@epa.gov  | (281) 983-2133 |
| George Wieber                                          | Contractor                                                                          | Eastern Research Group (ERG) | George.Wieber@erg.com    | 443-883-5253   |
|                                                        |                                                                                     |                              |                          |                |
| <b>Lead Inspector:</b>                                 |                                                                                     |                              |                          |                |
| Brook McKeown                                          |  |                              |                          | 9/11/2024      |
|                                                        | ERG                                                                                 |                              | Brook.McKeown@erg.com    | (410) 459-5811 |

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

The Port Fourchon 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 **Error! Reference source not found.**), 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**

| <b>Title/Organization</b>                     | <b>Name</b>        | <b>Phone</b>   | <b>Email</b>             | <b>Opening Conf.</b> | <b>Closing Conf.</b> |
|-----------------------------------------------|--------------------|----------------|--------------------------|----------------------|----------------------|
| Lead Inspector/<br>Contactor/ERG              | Brook<br>McKeown   | (410) 459-5811 | Brook.McKeown@erg.com    | Yes                  | Yes                  |
| RCRA Inspector/<br>Contractor/ERG             | George<br>Wieber   | 443-883-5253   | George.Wieber@erg.com    | Yes                  | Yes                  |
| Inspector/Enforcement<br>Officer/EPA Region 6 | Joyce<br>Johnson   | (214) 665-8548 | Johnson.Joyce-r6@epa.gov | Yes                  | Yes                  |
| Inspector/Enforcement<br>Officer/EPA Region 6 | Dedriel<br>Gardner | (281) 983-2133 | Gardner.Dedriel@epa.gov  | Yes                  | Yes                  |

**Facility General Description**

| Tenant/Area | Inspection Date | Process Description                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | Area of Concern |
|-------------|-----------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------|
| ES&H        | 4/18/24         | ES&H provides emergency response, tank cleaning, spill cleanup, and equipment maintenance services for port operations. ES&H puts used cleanup supplies and wastes into containers at the client site and transports them offsite to a destination facility for disposal. Occasionally, ES&H will bring the wastes back to its site temporarily as a transfer area. ES&H serves as a hazardous waste transporter, with its EPA ID associated with its Houma, LA location. The facility visited during this inspection is located in Golden Meadow, LA and does not maintain a MARPOL COA. | No              |

**SECTION II – OBSERVATIONS**

|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |                                                                                   |
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| <b>Tenant:</b> ES&H                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |                                                                                   |
| <b>Section:</b> 2                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | <b>Date:</b> 4/18/2024, 2:45 P.M. <b>Contains AOC:</b> No <b>Contains CBI:</b> No |
| <b>Lead Inspector:</b> Brook McKeown                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | <b>Attendees:</b> Lewis Walker (Supervisor/Technician)                            |
| <p>Mr. Walker, a Supervisor for ES&amp;H, provided the inspection team with a brief overview of company operations as well as site-specific operations at the Golden Meadow, LA location. ES&amp;H provides a variety of services to clients at Port Fourchon, including tank cleaning, spill response and cleanup, equipment maintenance, and stand-by support. Mr. Walker stated that any hazardous waste generated during cleanup or spill response activities is accumulated at the customer site, and ES&amp;H will transport the waste off the customer site to a designated facility, with the customer listed as the generator on the manifest. Mr. Walker stated that ES&amp;H will sometimes bring containers of waste back from the customer site to the ES&amp;H site in Golden Meadow, LA for transfer, and the containers would remain on site no longer than a week. The ES&amp;H site also uses frac tanks to temporarily store raw material, fuel, or bilge water for customers. Mr. Walker stated that the Golden Meadow, LA site may temporarily stage these frac tanks before returning to customers. ES&amp;H will use third parties to clean out and take any washwater when the frac tanks are cleaned if the customer does not want to keep the washwater for recovering materials. ES&amp;H is registered as a transporter for hazardous waste with an EPA ID LAR000037069.</p> <p>After the opening meeting with Mr. Walker, the inspection team conducted a visual inspection of the site at approximately 3:30 PM. The Golden Meadow, LA site does not have a dock or direct waterfront access from the property. The inspection team observed the supply and storage warehouse and an outdoor area, and no containers of hazardous waste were observed on site at the time of the inspection. There were four frac tanks present on site which were either empty or contained customer product or fuel for temporary storage. The inspection team did not observe any apparent AOCs at the time of the inspection; however, further EPA review may add to the facility's potential AOCs. The inspection team did not request further documentation and departed the facility at approximately 3:50 PM. Mr. Walker provided contact information for corporate personnel at the ES&amp;H Houma, LA location for any additional questions. Inspector McKeown called the contact number provided following the inspection but did not get a response.</p> |                                                                                   |

**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. The inspection team did not identify apparent areas of concern while on site at ES&H in Golden Meadow, LA.

**SECTION V – FOLLOW UP**

EPA did not request additional documentation from ES&H and did not identify apparent areas of concern during the inspection. ES&H did not send any follow-up email or correspondence related to this inspection.

**SECTION VI – LIST OF APPENDICES**

None.