

INSPECTION REPORT

Inspection Entry Date/Time	11/05/2024 8:40 (CT)	Announced: No (tenants and related facilities)		
Inspection Exit Date/Time	11/05/2024 11:25 (CT)	Access: Granted		
Regulatory Program	RCRA			
Type of Inspection	Focused Compliance Inspection (FCI)			
Facility or Site Name	Jefferson Railport Terminal			
Facility/Site Identifier	TXR000081730			
Facility/Site Physical Address	94 Old Highway 90 E			
City, State, Zip Code	Vidor, TX 77662			
County/Borough	Orange County			
Generator Status	N/A			
NAICS	424710			
Type of Operation	Jefferson Railport Terminal is a loading and unloading facility for crude oil and oil products such as yellow wax, WTI, Arab light, diesel, gasoline, and naphtha.			
Geographic Coordinates	30.0827, -94.0807			
Additional Persons Participating in Inspection:				
Name	Title	Organization	Email	Phone
Angela Hays	Inspector	EPA REGION 6	Hays.Angela@epa.gov	(214) 665-2285
Sandesh Thapa	Inspector	EPA REGION 6	Thapa.Sandesh@epa.gov	(214) 665-2265
Jon Herbay	Contractor	Eastern Research Group (ERG)	Jon.Herbay@erg.com	(412) 780-9931
Lead Inspector:				
Vince Damiano	Chemical Engineer			02/06/2025
	ERG	Vince.Damiano@erg.com	(703) 633-1732	

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

The Port of Beaumont 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 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	Phone	Email	Opening Conf.	Closing Conf.
Lead Inspector/ Contractor/ERG	Vince Damiano	(703) 633-1732	Vince.Damiano@erg.com	Yes	Yes
Inspector/Enforcement Officer/EPA Region 6	Angela Hays	(214) 665-2285	Hays.Angela@epa.gov	Yes	Yes
Inspector/Enforcement Officer/EPA Region 6	Sandesh Thapa	(214) 665-2265	Thapa.Sandesh@epa.gov	Yes	Yes
RCRA Inspector/ Contractor/ERG	Jon Herbay	(412) 780-9931	Jon.Herbay@erg.com	Yes	Yes
Jefferson Railport Terminal	John Istre	(405) 880-5891	jistre@jeffersonenergyco.com	Yes	Yes
Jefferson Railport Terminal	Chris Jeanes	(409) 554-1650	cjeanes@jeffersonenergyco.com	Yes	Yes

Facility General Description

Tenant/Area	Inspection Date	Process Description	Area of Concern
Jefferson Railport Terminal	11/05/24	Jefferson Railport Terminal (JRT) is a storage terminal for crude oil and oil-based products such as yellow wax, West Texas Intermediate (WTI) crude, Arab Light crude, diesel, gasoline, and naphtha. Their facility is covered under Port Beaumont's MARPOL COA for Annexes I and V.	Yes

SECTION II – OBSERVATIONS

Tenant: Jefferson Railport Terminal			
Section: 2.1	Date: 11/05/24, 08:40 AM	Contains AOC: Yes	Contains CBI: No
Lead Inspector: Vince Damiano	Attendees: John Istre (EHS Specialist), Chris Jeanes (Terminal Manager)		
JRT is located in the Port of Beaumont and operates as a midstream terminal for crude oil and refined oil products. The products RST handles consist of crude oil and oil-based products such as yellow wax, WTI crude, Arab Light crude, diesel, gasoline, and naphtha. JRT moves products via barges, ships, railcars, and pipelines. Once products are received, they are stored in one of 30 storage tanks ranging in size from 31,000 to 423,000 barrels. When products are being delivered to a ship or barge, they are moved through a designated pipe given the product and loaded through a loading arm at one of three docks. JRT is covered under Port of Beaumont’s MARPOL COA, but Mr. Jeanes stated they do not remove trash or waste from vessels. JRT is registered with the EPA (TXR000081730) but does not generate hazardous waste. JRT generates used oil, universal waste, and non-hazardous waste from tank cleanouts. Used oil is picked up by E3 OMI, LLC (TXD981055163) for recycling. Following the opening conference, the inspection team conducted a visual inspection of JRT’s dock spaces and waste storage areas. The team observed dock spaces OC1 and OC2. Each dock has a rainwater collection sump that is pumped back to its ditch system unless an incident such as a spill or a visible sheen is observed. No areas of concern (AOCs) were observed at JRT’s dock spaces. Next, the inspection team observed JRT’s drum storage area located in their operating area. The inspection team first observed two parts washers, one 55-gal and one 100-gal, that were not currently in use but left open (see Appendix 1 – Photos 1 and 2). The cleaning solvent used in the parts washers is recycled and serviced by Safety Kleen. The inspection team informed JRT that it is considered a best management practice to keep the parts washers closed when not in use, given the volatile nature of such solvents. The inspection team then observed several different-sized drums to the left of the parts washers that appeared to contain waste given their state including: • Six 55-gallon drums ranging from half-full to full of material, • Three 5-gallon containers that were half-full of material, • Three 35-gallon drums that were half-full of material; and • One drip pad that appeared to have oily liquid collected in it (see Appendix 1 – Photos 3 to 6). The drums did not contain any labels or markings. JRT representatives were not able to verify the contents of			

the drums or if the drums were storing waste materials at the time of the inspection [**AOC #1** – *JRT did not make a hazardous waste determination – 40 CFR 262.11*]. In front of the shed housing the parts washers, the inspection team observed one half-full 300-gallon tote storing HOH oil, a high-performance industrial lubricant, which is a usable product. The inspection team also found nineteen 55-gallon drums which were also not labeled and all contained material ranging from one-quarter full to full (see Appendix 1 – Photos 7 to 11). One of the 55-gallon drums was crushed (see Photo 10) and all the drums were stored on broken wooden pallets. JRT representatives were unsure what was being stored in the drums at the time of the inspection (see **AOC#1**). The inspection team also observed a 55-gallon drum accumulating unpunctured aerosol cans. JST stated they are managing the waste as universal waste and the hazardous waste label on the drum was not updated. The drum was closed but had a hole cut into the lid (see Appendix 1 – Photo 12).

The inspection team noticed that the facility manages and maintains the railroad tracks within the operating area of JST. The inspection team inquired about any waste generated from railroad maintenance. JST representatives said the largest waste stream is treated wood from the railroad tracks. Following the inspection, JST provided a non-hazardous waste manifest for the treated wood from track maintenance (see Appendix 2).

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 11:30 AM with JST personnel. The AOCs were communicated during the closing. Following the inspection, Mr. Istre sent two emails to the inspection team responding to the AOCs found during the inspection and providing any documents the inspection requested. On 11/6/2024, Mr. Istre sent a profile and manifest for treated wood from the railroad tracks (Appendix 2), an example waste profile and Bill of Lading (BOL) for oily waste (see Appendix 3), and an update on progress in email form (see Appendix 4). On 11/11/2024, Mr. Istre provided a picture of the aerosol drum found during the inspection with a new lid (Appendix 5). On 11/21/2024, Mr. Istre sent an email stating all of the drums found during the inspection were determined to contain usable product and provided several pictures including the lids of the parts washers closed and the drum storage area better organized (see Appendix 6).

SECTION III – RECORDS REVIEW

No RCRA regulated records were reviewed during this focused onsite inspection besides those mentioned in Section II.

SECTION IV – AREA OF CONCERN

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

Tenant: Jefferson Railport Terminal		
AOC #1 – JRT did not make a hazardous waste determination.	Citation: 40 CFR 262.11	Section: 2.1

SECTION V – FOLLOW UP

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

After the inspection, additional information was emailed to EPA including:

1. 11/05/24 JRT email – Mr. Jeanes provided the pictures taken from the inspection to the inspection team.
2. 11/06/24 JRT email – Mr. Istre sent a profile and manifest for treated wood from the railroad tracks, an example waste profile and BOL for oily waste, and an update on progress.
3. 11/11/24 JRT email – Mr. Istre provided a picture of the aerosol drum found during the inspection with a new lid.
4. 11/21/24 JRT email – Mr. Istre sent an email stating all of the drums found during the inspection were determined to contain usable product and provided several pictures including the lids of the parts washers closed and the drum storage area.

SECTION VI – LIST OF APPENDICES

Appendix 1. Photograph Log

Appendix 2. Treated Wood Profile and Manifest

Appendix 3. Oily Waste Profile and BOL

Appendix 4. JRT 11/6 Email Response

Appendix 5. Aerosol Drum Photo with New Lid

Appendix 6. JRT 11/21/24 Response

APPENDIX 1. PHOTOGRAPH LOG



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Location: Jefferson Railport Terminal		
City: Vidor	County/Parish: Orange	State: Texas



Photo No. 1

Photo File Name: IMG2458

Date of Photo: 11/05/2024

Time of Photo: Between 10:00 and 11:30 hrs.

Photographer: Chris Jeanes, JRT Terminal Manager

Description: View of a 100-gallon parts washer found in the drum storage area that had its lid left open at the time of the inspection.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Location: Jefferson Railport Terminal		
City: Vidor	County/Parish: Orange	State: Texas



Photo No. 2

Photo File Name: IMG2459

Date of Photo: 11/05/2024

Time of Photo: Between 10:00 and 11:30 hrs.

Photographer: Chris Jeanes, JRT Terminal Manager

Description: View of a 55-gallon parts washer found in the drum storage area that had its lid left open at the time of the inspection.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Location: Jefferson Railport Terminal		
City: Vidor	County/Parish: Orange	State: Texas



Photo No. 3

Photo File Name: IMG2460

Date of Photo: 11/05/2024

Time of Photo: Between 10:00 and 11:30 hrs.

Photographer: Chris Jeanes, JRT Terminal Manager

Description: View from left to right: two 55-gallon drums, three 35-gallon drums, and two 5-gallon containers found inside the drum storage area next to the parts washers. The containers were storing unknown materials at the time of the inspection.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Location: Jefferson Railport Terminal		
City: Vidor	County/Parish: Orange	State: Texas



Photo No. 4

Photo File Name: IMG2461

Date of Photo: 11/05/2024

Time of Photo: Between 1000 and 1130 hrs.

Photographer: Chris Jeanes, JRT Terminal Manager

Description: View from left to right: one 5-gallon container, six 55-gallon drums, and two 35-gallon drums found inside the drum storage area next to the parts washer. The containers were storing unknown materials at the time of the inspection.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Location: Jefferson Railport Terminal		
City: Vidor	County/Parish: Orange	State: Texas



Photo No. 5

Photo File Name: IMG2462

Date of Photo: 11/05/2024

Time of Photo: Between 10:00 and 11:30 hrs.

Photographer: Chris Jeanes, JRT Terminal Manager

Description: Another view of the containers seen above in Photo 5.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Location: Jefferson Railport Terminal		
City: Vidor	County/Parish: Orange	State: Texas



Photo No. 6

Photo File Name: IMG2463

Date of Photo: 11/05/2024

Time of Photo: Between 10:00 and 11:30 hrs.

Photographer: Chris Jeanes, JRT Terminal Manager

Description: View of drip pad that appeared to be storing oily rags and liquid inside the drum storage area.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Location: Jefferson Railport Terminal		
City: Vidor	County/Parish: Orange	State: Texas



Photo No. 7

Photo File Name: IMG2467

Date of Photo: 11/05/2024

Time of Photo: Between 10:00 and 11:30 hrs.

Photographer: Chris Jeanes, JRT Terminal Manager

Description: View of a half-full tote containing HOH oil and seven 55-gallon drums containing unknown materials at the time of the inspection.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Location: Jefferson Railport Terminal		
City: Vidor	County/Parish: Orange	State: Texas



Photo No. 8

Photo File Name: IMG2468

Date of Photo: 11/05/2024

Time of Photo: Between 10:00 and 11:30 hrs.

Photographer: Chris Jeanes, JRT Terminal Manager

Description: Another view of nineteen 55-gallon drums containing unknown materials at the time of the inspection in the drum storage area.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Location: Jefferson Railport Terminal		
City: Vidor	County/Parish: Orange	State: Texas



Photo No. 9

Photo File Name: IMG2469

Date of Photo: 11/05/2024

Time of Photo: Between 10:00 and 11:30 hrs.

Photographer: Chris Jeanes, JRT Terminal Manager

Description: Another view of nineteen 55-gallon drums containing unknown materials at the time of the inspection in the drum storage area.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Location: Jefferson Railport Terminal		
City: Vidor	County/Parish: Orange	State: Texas



Photo No. 10

Photo File Name: IMG2470

Date of Photo: 11/05/2024

Time of Photo: Between 10:00 and 11:30 hrs.

Photographer: Chris Jeanes, JRT Terminal Manager

Description: View of one of the unidentified 55-gallon drums shown to be crushed.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Location: Jefferson Railport Terminal		
City: Vidor	County/Parish: Orange	State: Texas



Photo No. 11

Photo File Name: IMG2471

Date of Photo: 11/05/2024

Time of Photo: Between 10:00 and 11:30 hrs.

Photographer: Chris Jeanes, JRT Terminal Manager

Description: Close-up view of the drums containing unknown materials shown to be stored on broken wooden pallets inside the drum storage area.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Location: Jefferson Railport Terminal		
City: Vidor	County/Parish: Orange	State: Texas



Photo No. 12

Photo File Name: IMG3752

Date of Photo: 11/05/2024

Time of Photo: Between 10:00 and 11:30 hrs.

Photographer: Chris Jeanes, JRT Terminal Manager

Description: View of a 55-gallon drum storing unpunctured aerosol cans, approximately half-full, that had a hole cut into the lid of the container found inside the drum storage area.

APPENDIX 2. TREATED WOOD PROFILE AND MANIFEST

Requested Facility: **Newton County Landfill**☐ Unsure Profile Number: **972841TX**☐ Multiple Generator Locations (Attach Locations) ☐ Request Certificate of Disposal ☒ Renewal? Original Profile Number: **972841TX****A. GENERATOR INFORMATION (MATERIAL ORIGIN)**

1. Generator Name: **Jefferson Railport Terminal I (Texas) LLC**
2. Generator Site Address: **94 OLD HIGHWAY 90 E**
(City, State, ZIP) **VIDOR TX 77662**
3. County: _____
4. Contact Name: **John Istre**
5. Email: **jistre@jeffersonenergyco.com**
6. Phone: **(409) 783-9191** 7. Fax: _____
8. Generator EPA ID: **TXR000081730** ☐ N/A
9. State ID: **95674** ☐ N/A

C. MATERIAL INFORMATION

1. Common Name: **treated wood - Rail Road Ties**
Describe Process(es) Generating Material: ☐ See Attached
Demolition/Dismantling of uncontaminated, weathered wood products with preservatives (e.g. creosote, CCA, pentachlorophenol). This material has no termites in any stage of development.
2. Material Composition and Contaminants: ☐ See Attached
- | 1. Wood (e.g. Telephone poles, Railroad ties) | 100-100 % |
|---|-----------|
| 2. | |
| 3. | |
| 4. | |
- Total comp. must be equal to or greater than 100% **≥100%**
3. State Waste Codes: **00084881** ☐ N/A
4. Color: **Varies**
5. Physical State at 70°F: ☒ Solid ☐ Liquid ☐ Other: _____
6. Free Liquid Range Percentage: _____ to _____ ☒ N/A
7. pH: _____ to _____ ☒ N/A
8. Strong Odor: ☐ Yes ☒ No Describe: _____
9. Flash Point: ☐ <140°F ☐ 140°-199°F ☐ ≥200° ☒ N/A

E. ANALYTICAL AND OTHER REPRESENTATIVE INFORMATION

1. Analytical attached ☐ Yes
Please identify Lab Report(s) and list specific representative Sample ID#s:
2. Other information attached (such as SDS)? ☐ Yes

G. GENERATOR CERTIFICATION (PLEASE READ AND CERTIFY BY SIGNATURE)

By signing this Waste Management ("WM") Profile, I hereby certify that all information submitted in this and all attached documents contain true and accurate descriptions of this material, and that all relevant information necessary for proper material characterization and to identify known and suspected hazards has been provided. Any analytical data attached was derived from a sample that is representative as defined in 40 CFR 261 - Appendix 1 or by using an equivalent method. All changes occurring in the character of the material (i.e., changes in the process or new analytical) will be identified by the Generator and be disclosed to WM prior to providing the material to WM. I am aware that there are significant penalties for knowingly submitting false information.

- ☐ I am authorized to sign on behalf of the Generator and I have confirmed with the Generator that information contained in this profile, as well as supporting documents provided, are accurate and complete.
- ☒ I am a duly authorized employee of Generator holding a position of technical responsibility with direct knowledge of the waste stream and the information contained in this profile, and I confirm that information contained in this profile, as well as supporting documents are accurate and complete.

QUESTIONS? CALL 800 963 4776 FOR ASSISTANCE**B. BILLING INFORMATION**☒ SAME AS GENERATOR

1. Billing Name: **Jefferson Railport Terminal I (Texas) LLC**
2. Billing Address: **94 OLD HIGHWAY 90 E**
(City, State, ZIP) **VIDOR TX 77662**
3. Contact Name: **John Istre**
4. Email: **jistre@jeffersonenergyco.com**
5. Phone: **(409) 783-9191** 6. Fax: _____
7. P.O. Number: _____
8. Payment Method: ☒ Credit Account ☐ Cash ☐ Credit Card at Gate

D. REGULATORY INFORMATION

1. EPA Hazardous Waste? ☐ Yes* ☒ No
Code: _____
2. State Hazardous Waste? ☐ Yes ☒ No
Code: _____
3. Is this material non-hazardous due to Treatment, Delisting, or an Exclusion? ☐ Yes* ☒ No
4. Contains Underlying Hazardous Constituents? ☐ Yes* ☒ No
5. Does the material contain benzene? ☐ Yes* ☒ No
6. Facility remediation subject to 40 CFR 63 GGGGG? ☐ Yes* ☒ No
7. CERCLA or State-mandated clean-up? ☐ Yes* ☒ No
8. NRC, State-regulated, NORM or TENORM waste? ☐ Yes* ☒ No

***If Yes, see Addendum (page 2) for additional questions and space.**

9. Contains PCBs? → If Yes, answer a, b and c. ☐ Yes ☒ No
a. Regulated by 40 CFR 761? ☐ Yes ☐ No
b. Remediation under 40 CFR 761.61? ☐ Yes ☐ No
c. Were PCBs imported into the US? ☐ Yes ☐ No
10. Regulated and/or Untreated Medical/Infectious Waste? ☐ Yes ☒ No
11. Contains Asbestos? ☐ Yes ☒ No
→ If Yes: ☐ Non-Friable ☐ Non-Friable - Regulated ☐ Friable
12. Contains Dioxins? (If Yes, please attach analysis) ☐ Yes ☒ No

F. SHIPPING AND DOT INFORMATION

1. ☐ One-Time Event ☒ Repeat Event/Ongoing Business
2. Estimated Annual Quantity/Unit of Measure: **100**
☒ Tons ☐ Yards ☐ Drums ☐ Gallons ☐ Other _____
3. Container Type and Size: **25 yard R/O**
4. USDOT Proper Shipping Name ☒ N/A
5. Estimated Start Date _____
6. Transportation Needed? ☐ Yes* ☒ No

Name (Print): **John Istre**

Title: **EHS Specialist**

Company: **Jefferson Gulf Coast Energy Partners LLC**

Date: **10/21/2024**

Certification Signature

John Istre

Please print or type.

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator ID Number
95674 / TXR000081730

2. Page 1 of 1

3. Emergency Response Phone
(800)424-9300

4. Manifest Tracking Number
025911277 JJK

Generator's Site Address (if different than mailing address)
SAME

5. Generator's Name and Mailing Address
JEFFERSON RAILPORT TERMINAL
94 OLD HIGHWAY 90 E
VIDOR TX 77662

Generator's Phone:
(409)783-9191

6. Transporter 1 Company Name
GFL

7. Transporter 2 Company Name

U.S. EPA ID Number

TX R000076257

U.S. EPA ID Number

U.S. EPA ID Number

8. Designated Facility Name and Site Address

NEWTON COUNTY REGIONAL
2372 COUNTY RD 3870
DEWEYVILLE TX 77614

Facility's Phone:
(409)746-9919

H2242

TX R000081730

9a. HM

9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))

1. NON HAZARDOUS NON DOT REGULATED MATERIALS
(TREATED WOOD - RAIL ROAD TIES)

10. Containers

No. Type

11. Total Quantity

12. Unit Wt./Vol.

13. Waste Codes

001

CM

40

Y

0008

4881

14. Special Handling Instructions and Additional Information
PROFILE # 972841TX

Track # 4404

Box # R041194

15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator's/Officer's Printed/Typed Name

Johnathan Istre

Signature

[Signature]

Month Day Year

11/16/24

16. International Shipments

☐ Import to U.S.

☐ Export from U.S.

Port of entry/exit:

Date leaving U.S.:

Transporter signature (for exports only):

17. Transporter Acknowledgment of Receipt of Materials

Transporter 1 Printed/Typed Name

John Hoffbauer

Signature

[Signature]

Month Day Year

11/16/24

Transporter 2 Printed/Typed Name

18. Discrepancy

18a. Discrepancy Indication Space

☐ Quantity

☐ Type

☐ Residue

☐ Partial Rejection

☐ Full Rejection

Manifest Reference Number:

U.S. EPA ID Number

18b. Alternate Facility (or Generator)

Facility's Phone:

18c. Signature of Alternate Facility (or Generator)

Month Day Year

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)

1. H132

2.

3.

4.

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a

Printed/Typed Name

Joseph F. Schell

Signature

[Signature]

Month Day Year

11/16/24



WM Newton County Landfill
P.O. Box 530
Mauriceville, TX, 77626
Ph: (409) 746-9920

Reprint
Ticket# 611344

Customer Name JEFFERSON JEFFERSON RAILPORT Carrier SPRINT WASTE SPRINT WASTE
Ticket Date 10/16/2024 Vehicle# 4404 Volume
Payment Type Credit Account Container
Manual Ticket# Driver
Hauling Ticket# Check#
Route Billing # 0000883
State Waste Code 00084881 Gen EPA ID 95674
Manifest 025911277jjk
Destination Grid
PO 002009
Profile 972841TX (Treated wood - Rail Road Ties)
Generator HO-JEFFERSONRAIL JEFFERSON RAILPORT 1

	Time	Scale	Operator	Inbound	Gross	40300 lb
In	10/16/2024 14:50:26	Scale 1	Inbou JFISCHET		Tare	35540 lb
Out	10/16/2024 15:07:06	Scale 2	Outbo JFISCHET		Net	4760 lb
					Tons	2.38

Comments REPLACEMENT TICKET FOR TICKET Nbr 611340

HOURS MON-FRI 7:00AM-5:00PM

Product	LD%	Qty	UOM	Rate	Tax	Amount	Origin
1 C1 Solids-Tons-Sol	100	2.38	Tons				
2 RCR-P-Regulatory C	100		%				
3 FUEL-Fuel Surcharg	100		%				
4 WWM-P-Waste Water	100		%				
5 MFE-e-Manifest (La	100	1.00	Each				
6 EVF-P-Standard Env	100		%				

Total Tax
Total Ticket

Driver`s Signature

APPENDIX 3. OILY WASTE PROFILE AND BOL

Bill of Lading

DOCUMENT #

759362

TO

Consignee: CHEMICAL WASTE MANAGEMENT, INC
Street: 7170 JOHN BRANNON RD
EPA ID: LAD000777201
City/State/Zip: SULPHUR LA 70665

FROM

Shipper: JEFFERSON RAILPORT 1
Street: 94 OLD HIGHWAY 90 EAST
EPA ID: TXR000081730
City/State/Zip: VIDOR TX 77662
Special Instructions:

ADDITIONAL INFORMATION

TICKET #

TRANSPORTER

Carrier: SPRINT Waste
Street: 1000 S Business PK drive
EPA ID: TXR000076257
City/State/Zip: PT Arthur Tx

HAZARDOUS MATERIAL	NO. SHIPPING UNITS	DESCRIPTION OF ARTICLES SPECIAL MARKS & EXCEPTIONS	VOLUME	UOM
X	1	UN1993, FLAMMABLE LIQUIDS, NOS., (KEROSENE), 3, III PROFILE : 969648LA	CM	3923 Gal
		ERL 128		17039

RECEIVED subject to the classifications and tariffs in effect on the date of the issue of this Bill of Lading, the property described above in apparent good order, except as noted (contents and condition of packages unknown), marked consigned and destined as indicated above which said carrier (the word carrier being understood through this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery as said destination. If on its route, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed as to each carrier of all or any of said property, over all or any portion of said route to destination and as to each party at any time interested in all or any said property, that every service to be performed hereunder shall be subject to all the Bill of Lading terms and conditions in the governing classification on the date of shipment. Shipper hereby certifies that he is familiar with all the Bill of Lading terms and conditions in the governing classification and the said terms and conditions.

Shipper: Jefferson Railport 1	Carrier: R.H.P.
Per: M. THOMPSON	Date: 2-23-21

Mark with "X" or "RQ" if appropriate to designate Hazardous Materials Substances as defined in the Department of Transportation Regulations governing the transportation of hazardous materials. The use of this column is an optional method for identifying hazardous materials on Bills of Lading 172.201(a)(1)(iii) of Title 49, Code of Federal Regulations. Also when shipping hazardous materials, the shipper's certification statement prescribed in section 172.204(a) of the Federal Regulations, as indicated on the Bill of Lading does apply, unless a specific exception from the requirement is provided in the Regulation for a particular material.

Truck # 7509

Free Tank # N38707

Causey G 2-23-21



CWM - Lake Charles - NW LA
7170 John Brannon Road
Sulphur, LA, 70665
Ph: 337-583-3617

Reprint
Ticket# 93036

Customer Name JEFFERSONGULFCOAST JEFFERSON Carrier TXR00076257 Sprint Sprint Waste
Ticket Date 02/23/2021 Vehicle# 7509 Volume
Payment Type Credit Account Container
Manual Ticket# Driver
Hauling Ticket# Check#
Route Billing # 0000760
State Waste Code Gen EPA ID NR
Manifest 0000759362
Destination Grid
PO PO001148
Profile 969648LA (VRE OIL BEARING MATERIAL(D001))
Generator 149-JEFFERSONRAILPORT JEFFERSON RAILPORT 1

	Time	Scale	Operator	Inbound	Gross	
In	02/23/2021 10:06:12	MANUAL WT	AGASS1		Tare	75100 lb*
Out	02/23/2021 10:06:12		AGASS1		Net	42280 lb*
			* Manual Weight		Tons	32820 lb
Comments	DISPOSAL					16.41

Product	LD%	Qty	UOM	Rate	Tax	Amount	Origin
1 RCRA ORU/TON - VRE	100	16.41	Tons				
2 EVF-P-Standard Env	100		%				
3 FUEL-Fuel Surcharge	100		%				
4 WWM-P-Waste Water	100		%				

Total Tax
Total Ticket

Driver's Signature



Requested Facility: CWM Lake Charles ☐ Unsure Profile Number: 969648LA
☐ Multiple Generator Locations (Attach Locations) ☐ Request Certificate of Disposal ☐ Renewal? Original Profile Number: _____

A. GENERATOR INFORMATION (MATERIAL ORIGIN)

1. Generator Name: Jefferson Railport 1
2. Site Address: 94 Old Highway 90 East
(City, State, ZIP) Vidor TX 77662
3. County: Jefferson
4. Contact Name: Phillip Trew
5. Email: ptrew@jeffersonenergyco.com
6. Phone: (903) 733-1548 7. Fax: _____
8. Generator EPA ID: TXR000081730 ☐ N/A
9. State ID: 95674 ☐ N/A

C. MATERIAL INFORMATION

1. Common Name: VRE Oil Bearing Material (D001)
Describe Process(es) Generating Material: ☐ See Attached
Petroleum contaminated material that will be managed in compliance with LAC 33: V.105.D.1.y (Verified Recycling Exclusion). Excluded waste codes will include D001.
2. Material Composition and Contaminants: ☐ See Attached

1. Oil Bearing Contaminated Material	100 %
2. Debris	0-10 %
3.	
4.	
Total comp. must be equal to or greater than 100%	≥100%

3. State Waste Codes: _____ ☒ N/A
4. Color: Varies
5. Physical State at 70°F: ☐ Solid ☒ Liquid ☐ Other: _____
6. Free Liquid Range Percentage: 95 to 100 ☐ N/A
7. pH: 5 to 10 ☐ N/A
8. Strong Odor: ☐ Yes ☒ No Describe: _____
9. Flash Point: ☒ <140°F ☐ 140°-199°F ☐ ≥200° ☐ N/A

E. ANALYTICAL AND OTHER REPRESENTATIVE INFORMATION

1. Analytical attached ☒ Yes
Please identify applicable samples and/or lab reports:
Jefferson 0K09002_2 EAS_Default 11 23 20 0954
2. Other information attached (such as MSDS)? ☒ Yes

G. GENERATOR CERTIFICATION (PLEASE READ AND CERTIFY BY SIGNATURE)

By signing this EZ Profile™ form, I hereby certify that all information submitted in this and all attached documents contain true and accurate descriptions of this material, and that all relevant information necessary for proper material characterization and to identify known and suspected hazards has been provided. Any analytical data attached was derived from a sample that is representative as defined in 40 CFR 261 - Appendix 1 or by using an equivalent method. All changes occurring in the character of the material (i.e., changes in the process or new analytical) will be identified by the Generator and be disclosed to Waste Management prior to providing the material to Waste Management.

☐ I am an Authorized Agent signing on behalf of the Generator, and I have confirmed with the Generator that information contained in this profile, as well as supporting documents provided, are accurate and complete.

Name (Print): John Istre Date: 12/04/2020
Title: EHS Specialist
Company: Jefferson Energy

B. BILLING INFORMATION☐ SAME AS GENERATOR

1. Billing Name: Jefferson Gulf Coast Energy Partners LLC
2. Billing Address: 811 Louisiana Street Suite 2300
(City, State, ZIP) Houston TX 77002
3. Contact Name: John Istre
4. Email: jistre@jeffersonenergyco.com
5. Phone: (409) 880-5891 6. Fax: _____
7. WM Hauled? ☒ Yes ☐ No
8. P.O. Number: _____
9. Payment Method: ☒ Credit Account ☐ Cash ☐ Credit Card

D. REGULATORY INFORMATION

1. EPA Hazardous Waste? ☐ Yes* ☒ No
Code: _____
2. State Hazardous Waste? ☐ Yes ☒ No
Code: _____
3. Is this material non-hazardous due to Treatment, Delisting, or an Exclusion? ☐ Yes* ☒ No
4. Contains Underlying Hazardous Constituents? ☐ Yes* ☒ No
5. From an industry regulated under Benzene NESHAP? ☐ Yes* ☒ No
6. Facility remediation subject to 40 CFR 63 GGGGG? ☐ Yes* ☒ No
7. CERCLA or State-mandated clean-up? ☐ Yes* ☒ No
8. NRC or State-regulated radioactive or NORM waste? ☐ Yes* ☒ No
***If Yes, see Addendum (page 2) for additional questions and space.**
9. Contains PCBs? → If Yes, answer a, b and c. ☐ Yes ☒ No
a. Regulated by 40 CFR 761? ☐ Yes ☐ No
b. Remediation under 40 CFR 761.61 (a)? ☐ Yes ☐ No
c. Were PCB imported into the US? ☐ Yes ☐ No
10. Regulated and/or Untreated Medical/Infectious Waste? ☐ Yes ☒ No
11. Contains Asbestos? ☐ Yes ☒ No
→ If Yes: ☐ Non-Friable ☐ Non-Friable - Regulated ☐ Friable

F. SHIPPING AND DOT INFORMATION

1. ☒ One-Time Event ☐ Repeat Event/Ongoing Business
2. Estimated Quantity/Unit of Measure: 25000
☐ Tons ☐ Yards ☐ Drums ☒ Gallons ☐ Other: _____
3. Container Type and Size: 130 Barrell Tanker
4. USDOT Proper Shipping Name: _____ ☐ N/A
UN3077, ENVIRONMENTALLY HAZARDOUS SUBSTANCE, SOLID, N.O.S. 9, PG III

Certification Signature

009602747...

APPENDIX 4. JRT 11/6 EMAIL RESPONSE

RE: Follow-up From EPA Visit on 11/5

From John Istre <jistre@jeffersonenergyco.com>

Date Wed 11/6/2024 11:43 AM

To Vince Damiano <Vince.Damiano@erg.com>; Chris Jeanes <cjeanes@jeffersonenergyco.com>

Cc Jon Herbay <Jon.Herbay@erg.com>; Hays, Angela <hays.angela@epa.gov>; Thapa, Sandesh <Thapa.Sandesh@epa.gov>; Chris Corcoran <ccorcoran@jeffersonenergyco.com>

 2 attachments (2 MB)

BOL and Profile of Recycled Material.pdf; Treated Wood Profile and Manifest.pdf;

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

Vince,

Thanks for the response and list:

Answers in Red

1. Follow up on certificate of recycle and example of manifest for treated wood on railroad. (See attached)
2. Waste determinations on nineteen 55-gallon drums outside of maintenance area; and six 55-gallon drums, three 5-gallon containers, and three 35-gallon drums next to parts washer; and nine 5-gallon containers in annex behind maintenance shop. (In Progress)
3. Parts washers left open (In Progress)
4. Open aerosol can drum (In Progress)

Just so I'm clear we have 14 Days from Friday 11/8/24 to address these issues? That date being 11/22/24.

- Should any items on number 2 be determined to be waste just note that we use an offsite analytical and would then have to profile and set up pickup of said waste which may take more than the allotted two weeks but should that occur I'll continue to supply updates and proof that we are moving forward should any of these items be determined to be waste.

-
Thanks a bunch.

John Istre

E.H.S. Specialist

Jefferson Rail Port Terminal

94 Old Hwy 90

Vidor, Texas 77662

Office(409)681-6106

Cell: (409)880-5891

jistre@jeffersonenergyco.com



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

Sent: Tuesday, November 5, 2024 4:10 PM

To: Chris Jeanes <cjeanes@jeffersonenergyco.com>; John Istre <jistre@jeffersonenergyco.com>

Cc: Jon Herbay <Jon.Herbay@erg.com>; Hays, Angela <hays.angela@epa.gov>; Thapa, Sandesh <Thapa.Sandesh@epa.gov>

Subject: Follow-up From EPA Visit on 11/5

[***EXTERNAL EMAIL*** SENDER IS LOCATED OUTSIDE OF THE ORGANIZATION]

Hello John and Chris,

I am following up with a list of items and notes from our inspection today. Below are initial Areas of Concern and items requested; you may follow-up with pictures, write-ups, sample results, or however you see fit:

- Follow up on certificate of recycle and example of manifest for treated wood on railroad
- Waste determinations on nineteen 55-gallon drums outside of maintenance area; and six 55-gallon drums, three 5-gallon containers, and three 35-gallon drums next to parts washer; and nine 5-gallon containers in annex behind maintenance shop.
- Parts washers left open
- Open aerosol can drum

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

APPENDIX 5. AEROSOL DRUM PHOTO WITH NEW LID



Image of aerosol can drum with new lid sent on 11/11/2024 by JRT.

APPENDIX 6. JRT 11/21/24 RESPONSE

RE: Follow-up From EPA Visit on 11/5

From John Istre <jistre@jeffersonenergyco.com>

Date Thu 11/21/2024 5:00 PM

To Vince Damiano <Vince.Damiano@erg.com>

Cc Jon Herbay <Jon.Herbay@erg.com>; Hays, Angela <hays.angela@epa.gov>; Thapa, Sandesh <Thapa.Sandesh@epa.gov>; Chris Corcoran <ccorcoran@jeffersonenergyco.com>; Chris Jeanes <cjeanes@jeffersonenergyco.com>

 4 attachments (18 MB)

IMG_0201.JPG; IMG_0204.JPG; IMG_0206.JPG; IMG_0200.JPG;

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

Vince,

After further review and discussions, we have determined that there was no waste and that all drums had usable product including soaps and Fire Fighting Foam. We have labeled everything that needed labeling and relocated what needed to be relocated to other areas for better organization.

We have also closed the parts cleaning stations and put signs stating when not in use they must be closed.

Please see attached pictures.

This should be everything on the list please let me know if there is anything else you need from us concerning the actions listed below.

Thanks have a good weekend and Thanksgiving.

John Istre

E.H.S. Specialist

Jefferson Rail Port Terminal

94 Old Hwy 90

Vidor, Texas 77662

Office(409)681-6106

Cell: (409)880-5891

jistre@jeffersonenergyco.com



From: John Istre

Sent: Monday, November 11, 2024 3:14 PM

To: Vince Damiano <Vince.Damiano@erg.com>; Chris Jeanes <cjeanes@jeffersonenergyco.com>

Cc: Jon Herbay <Jon.Herbay@erg.com>; Hays, Angela <hays.angela@epa.gov>; Thapa, Sandesh <Thapa.Sandesh@epa.gov>; Chris Corcoran <ccorcoran@jeffersonenergyco.com>

Subject: RE: Follow-up From EPA Visit on 11/5

Vince,

Please see attached for Item #4

Thanks

John Istre

E.H.S. Specialist

Jefferson Rail Port Terminal

94 Old Hwy 90

Vidor, Texas 77662

Office(409)681-6106

Cell: (409)880-5891

jistre@jeffersonenergyco.com



From: John Istre

Sent: Wednesday, November 6, 2024 10:43 AM

To: Vince Damiano <Vince.Damiano@erg.com>; Chris Jeanes <cjeanes@jeffersonenergyco.com>

Cc: Jon Herbay <Jon.Herbay@erg.com>; Hays, Angela <hays.angela@epa.gov>; Thapa, Sandesh <Thapa.Sandesh@epa.gov>; Chris Corcoran <ccorcoran@jeffersonenergyco.com>

Subject: RE: Follow-up From EPA Visit on 11/5

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Answers in Red

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3. Parts washers left open (In Progress)
4. Open aerosol can drum (Done)

Just so I'm clear we have 14 Days from Friday 11/8/24 to address these issues? That date being 11/22/24.

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-
Thanks a bunch.

John Istre

E.H.S. Specialist
Jefferson Rail Port Terminal
94 Old Hwy 90
Vidor, Texas 77662

Office(409)681-6106

Cell: (409)880-5891

jistre@jeffersonenergyco.com



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

Sent: Tuesday, November 5, 2024 4:10 PM

To: Chris Jeanes <cjeanes@jeffersonenergyco.com>; John Istre <jistre@jeffersonenergyco.com>

Cc: Jon Herbay <Jon.Herbay@erg.com>; Hays, Angela <hays.angela@epa.gov>; Thapa, Sandesh <Thapa.Sandesh@epa.gov>

Subject: Follow-up From EPA Visit on 11/5

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- Open aerosol can drum

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Thanks,
Vince



Vince Damiano

Chemical Engineer, Chantilly Office

Cell: (703) 835-6281

Vince.Damiano@erg.com







