

INSPECTION REPORT

Inspection Entry Date/Time	04/17/2024 10:00 (CT)		Announced: No	
Inspection Exit Date/Time	04/17/2024 10:45 (CT)		Access: Granted	
Regulatory Program	RCRA			
Type of Inspection	Focused Compliance Inspection (FCI)			
Facility or Site Name	Harbor Docking & Towing Co, LLC (HD&T)			
Facility/Site Identifier	N/A			
Facility/Site Physical Address	4957 Big Lake Rd Bldg A			
City, State, Zip Code	Lake Charles, LA 70605			
County/Borough	Calcasieu Parish			
Generator Status	None			
NAICS	N/A			
Type of Operation	HD&T is a ship assist company that operates tugs that lead barges through Lake Charles and the surrounding waters.			
Geographic Coordinates	30.167501, -93.282610			
Additional Persons Participating in Inspection:				
Name	Title	Organization	Email	Phone
Elizabeth Pham	Inspector	EPA REGION 6	Pham.elizabeth@epa.gov	(214) 665-8354
Sandesh Thapa	Inspector	EPA REGION 6	Thapa.sandesh@epa.gov	(214) 665-2265
Anshul Paripati	Contractor	Eastern Research Group (ERG)	Anshul.Paripati@erg.com	(571) 535-1503
Lead Inspector:				
Cameron Tanaka				07/24/2024
	ERG	Cameron.Tanaka@erg.com	(703) 633-1632 ext. 11632	

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

Type of inspection: Focused Compliance Inspection (FCI)

The Port of Lake Charles 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, 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	Cameron Tanaka	(703) 633-1632 ext. 11632	Cameron.Tanaka@erg.com	Yes	No
RCRA Inspector/ Contractor/ERG	Anshul Paripati	(571) 535-1503	Anshul.Paripati@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	Sandesh Thapa	(214) 665-2265	Thapa.sandesh@epa.gov	Yes	Yes

Facility General Description

Tenant/Area	Inspection Date	Process Description	Area of Concern
Harbor Docking & Towing Co., LLC	04/17/24	Harbor Docking & Towing Co., LLC (HD&T) is a ship assist company that operates six tugboats. These tugboats assist barges that come into the river leading into Lake Charles to get through the river into the docks/harbor. Their tugs generate garbage and oily water that is taken directly off the tugboats onto vacuum trucks. They do not have a MARPOL COA.	No

SECTION II – OBSERVATIONS

Tenant: Harbor Docking & Towing Co, LLC			
Section: 2.1	Date: 04/17/24, 10:00 AM	Contains AOC: No	Contains CBI: No
Lead Inspector: Cameron Tanaka	Attendees: Wesley Dugas (Vice President) and Doug Pierce (Marine Supervisor)		
Harbor Docking & Towing Co, LLC (HD&T) is a ship assist company that uses their seven tugboats to assist vessels and barges navigate through the rivers surrounding Lake Charles. Ship operators order their tugboats to help navigate under bridges and through shallow water and narrow passages, or to and from docks. For garbage, oily water, and used oil generated by their tugboats, vacuum trucks from Environmental Response Services (ERS) remove and transport the waste directly off the tugboats. They contract ERS for all maintenance related waste, including used oil. They contract ERS for fueling and disposal trucks as needed. They do not generate any universal waste through their operations. HD&T does not own their own dock and does not have a MARPOL COA. They also do not have an EPA ID number. No apparent AOCs were observed by the inspection team during the time of the inspection. A closing conference was conducted at approximately 10:35 AM with HD&T personnel.			

SECTION III – RECORDS REVIEW

No RCRA regulated records reviewed during this focused onsite inspection.

SECTION IV – APPARENT AREAS OF CONCERN

The presentation of Area(s) of Concern does not constitute a formal compliance determination or violation. HD&T did not have any Areas of Concern.

SECTION V – FOLLOW UP

Follow-Up

Any facility follow-up items are as discussed in each facility's observations in Section II. Documents or files provided by the facilities were transmitted via email and included responses to areas of concern or provision of documents requested.

Communication Log

During and after the inspection, additional information from HD&T was not requested.