

INSPECTION REPORT

Inspection Entry Date/Time	3/27/2025 09:45 (CT)		Announced: No (tenants and related facilities)
Inspection Exit Date/Time	3/27/2025 11:00 (CT)		Access: Granted
Regulatory Program	RCRA		
Type of Inspection	Compliance Evaluation Inspection (CEI)		
Facility or Site Name	New Industries LLC		
Facility/Site Identifier	LAR000034850		
Facility/Site Physical Address	6032 Railroad Ave		
City, State, Zip Code	Morgan City, LA 70380		
County/Borough	St. Mary		
Generator Status	SQG		
NAICS	335312		
Type of Operation	New Industries provides steel fabrication services to offshore oil and gas marine industries.		
Geographic Coordinates	29.6894, -91.1697		
Additional Persons Participating in Inspection:			
Name	Title	Organization	Email
John Penland	Inspector	EPA REGION 6	Penland.John@epa.gov
Erin Young-Dahl	Inspector	EPA REGION 6	Youngdahl.Erin@epa.gov
Janosh Wolters	Contractor	Eastern Research Group (ERG)	Janosh.Wolters@erg.com
Lead Inspector:			
Vince Damiano	Vincent Damiano Digitally signed by Vincent Damiano Date: 2025.05.01 16:37:52 -04'00'		
	ERG	Vince.Damiano@erg.com	

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

The Port of Morgan City and surrounding facilities were selected for inspection based on a 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 other 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 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	Email	Opening Conf.	Closing Conf.
Lead Inspector/ Contractor/ERG	Vince Damiano	Vince.Damiano@erg.com	Yes	Yes
Inspector/Enforcement Officer/EPA Region 6	John Penland	Penland.John@epa.gov	Yes	Yes
Inspector/Enforcement Officer/EPA Region 6	Erin Young-Dahl	Youngdahl.Erin@epa.gov	Yes	Yes
RCRA Inspector/ Contractor/ERG	Janosh Wolters	Janosh.Wolters@erg.com	Yes	Yes
New Industries/Manager	Chad Paradee	Chad.paradee@newindustries.com	Yes	Yes
New Industries/Engineering	Andrew Mancuso	Andrew.mancuso@newindustries.com	Yes	Yes

Facility General Description

Tenant/Area	Inspection Date	Process Description	Area of Concern
New Industries LLC	3/27/25	New Industries provides steel fabrication services to the offshore oil and gas marine industries. The facility does not maintain a MARPOL COA.	Yes

SECTION II – OBSERVATIONS

Facility: New Industries LLC			
Section: 2.1	Date: 3/27/25, 09:45 AM	Contains AOC: Yes	Contains CBI: No
Lead Inspector: Vince Damiano	Attendees: Chad Paradee (Manager) and Andrew Mancuso (Engineering)		
New Industries, located in Morgan City, LA, operates as a steel fabricator serving primarily offshore oil and gas platforms. Raw materials are received mostly by truck and go through molding, shaping, stamping, and painting before being delivered to customers. The facility has one dock space, used mainly for loading out fabricated materials, and does not accept any waste from vessels at this dock. According to Mr. Mancuso, the primary waste streams are scrap metal, paint waste, and used oil. New Industries is registered with the EPA as a Small Quantity Generator (SQG) of hazardous waste under EPA ID LAR000034850. After the opening conference, the inspection team observed New Industries’ waste storage area, process yard, and carpenter shop. The waste storage area consisted of a locked shed and an adjacent outdoor section used for storing used oil. Inside the shed, there were two large wooden boxes, each approximately 300 gallons in size, labeled “Electronics” and “Bulbs” (see Appendix 1 – Photos 1 and 2). The electronics box contained a small amount of discarded wires and switches, while the used lamps box was about one-quarter full of universal waste lamps [AOC #1 – New Industries did not label a container or package in which lamps with one of the following phrases: “Universal Waste—Lamp(s),” or “Waste Lamp(s),” or “Used Lamp(s)”. – 40 CFR 273.14(e)]. At the time of the inspection, the facility representatives were not able to demonstrate the length of time the universal waste lamps had been accumulating [AOC #2 – New Industries did not demonstrate the length of time that the universal waste has been accumulated from the date it becomes waste – 40 CFR 273.15(c)]. The inspection team also observed four 5-gallon containers and one 10-gallon container storing unknown liquid materials inside the storage shed (see Appendix 1 – Photos 3 to 6). Mr. Mancuso was unable to determine if the material in these containers was considered waste at the time of the inspection [AOC #3 – New Industries did not make a hazardous waste determination - 40 CFR 262.11]. Outside the storage shed, the inspection team observed a metal dumpster containing used oil filters. It was initially believed to be unlabeled, but upon closer inspection, a yellow label on the container was found to include the words “Used Oil” (see Appendix 1 – Photo 8). Next to the container, the team also observed an unlabeled full 55-gallon drum of used oil (see Appendix 1 – Photo 9) [AOC #4 – New Industries did not clearly label containers used to store used oil with the words “Used Oil” - 40 CFR 279.45(g)(1)]. To the right of the storage shed, in the used oil storage area, the inspection team observed five unlabeled 5-gallon containers of used oil, ranging from one-quarter to half full. One full 55-gallon drum of used oil was also present and unlabeled (see Appendix 1 – Photos 10 to 13) [see AOC#4]. Next, the inspection team walked through the process yard where assembly and painting activities occur. The inspection team did not note any AOCs throughout the process yard but observed several instances of empty			

paint cans discarded throughout the area, some of which were accumulating rainwater (see Appendix 1 – Photos 14 to 18). The inspection team stated it would be best management practice to remove the empty paint cans each day or create a satellite accumulation area.

The inspection team then moved to the Carpenter Shop which stores the aerosol can waste and the puncturing station. The inspection team observed two 55-gallon drums of unpunctured aerosol cans, two 55-gallon drums of punctured aerosol cans, and the puncturing mechanism, which was not properly affixed to a drum to capture the residual waste (see Appendix 1 – Photos 19 to 25). The drums were not properly labeled and just contained the marking “Aerosol Cans” [**AOC #5** – *New Industries did not clearly label or mark universal waste containers with any of the following phrases: “Universal Waste—Aerosol Can(s),” “Waste Aerosol Can(s),” or “Used Aerosol Can(s)” - 40 CFR 273.14(f)*]. The puncturing mechanism used at the time of the inspection was handheld and could not effectively contain the residual contents and any emissions from the aerosol cans [**AOC#6** – *New Industries did not meet the following requirements while puncturing and draining universal waste aerosol cans” - 40 CFR 273.13(e)(4)*]. At the time of the inspection, the facility representatives were not able to demonstrate the length of time the aerosol cans had been accumulating (see **AOC#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 11:00 AM with New Industries personnel. The AOCs were communicated during the closing. Following the inspection on 4/4/2025, Mr. Cody Rink sent a follow-up email in response to the AOCs observed during the inspection, including:

- Universal waste lamps have been transferred into labeled containers and have been scheduled for pickup.
- Used oil has been consolidated into labeled containers.
- Waste determinations on the containers in the storage shed have been completed and assigned to the proper waste streams.
- An effective aerosol can puncturing system was purchased and is in use.
- Previously unpunctured aerosol cans have been punctured with the residual contents labeled.

See the full response in Appendix 2.

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.

Facility: New Industries LLC		
AOC #1 – New Industries did not label a container or package in which lamps with one of the following phrases: “Universal Waste—Lamp(s),” or “Waste Lamp(s),” or “Used Lamp(s)”	Citation: 40 CFR 273.14(e)	Section: 2.1
AOC #2 – New Industries did not demonstrate the length of time that the universal waste has been accumulated from the date it becomes waste.	Citation: 40 CFR 273.15(c)	Section: 2.1
AOC #3 – New Industries did not make a hazardous waste determination.	Citation: 40 CFR 262.11	Section: 2.1
AOC #4 – New Industries did not clearly label containers used to store used oil with the words “Used Oil”	Citation: 40 CFR 279.45(g)(1)	Section: 2.1
AOC #5 – New Industries did not clearly label or mark universal waste containers with any of the following phrases: “Universal Waste—Aerosol Can(s),” “Waste Aerosol Can(s),” or “Used Aerosol Can(s)”	Citation: 40 CFR 273.14(f)	Section: 2.1
AOC #6 – New Industries did not meet the following requirements while puncturing and draining universal waste aerosol cans...”	Citation: 40 CFR 273.13(e)(4)	Section: 2.1

SECTION IV – 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

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

1. 4/4/25 New Industries email – Mr. Cody Rink provided the inspection team with photos and explanations of corrections made towards AOCs observed.

SECTION VI – LIST OF APPENDICES

Appendix 1. Photograph Log

Appendix 2. 4/4/25 Response from New Industries

APPENDIX 1.
PHOTOGRAPH LOG



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Location: New Industries LLC		
City: Morgan City	County/Parish: St. Mary	State: Louisiana



Photo No. 1

Photo File Name: DSCN7903

Date of Photo: 3/27/2025

Time of Photo: 1005 hrs.

Photographer: Vince Damiano

Description: View of 300-gallon wooden boxes in the waste storage shed storing electronic waste and universal waste lamps, not properly labeled as universal waste.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Location: New Industries LLC		
City: Morgan City	County/Parish: St. Mary	State: Louisiana



Photo No. 2

Photo File Name: DSCN7904

Date of Photo: 3/27/2025

Time of Photo: 1005 hrs.

Photographer: Vince Damiano

Description: Another view of 300-gallon wooden boxes in the waste storage shed storing electronic waste and universal waste lamps, not properly labeled as universal waste.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Location: New Industries LLC		
City: Morgan City	County/Parish: St. Mary	State: Louisiana



Photo No. 3

Photo File Name: DSCN7905

Date of Photo: 3/27/2025

Time of Photo: 1005 hrs.

Photographer: Vince Damiano

Description: View of half-full 10-gallon and two 5-gallon containers inside the waste storage shed that were not labeled.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Location: New Industries LLC		
City: Morgan City	County/Parish: St. Mary	State: Louisiana



Photo No. 4

Photo File Name: DSCN7906

Date of Photo: 3/27/2025

Time of Photo: 1005 hrs.

Photographer: Vince Damiano

Description: View of an additional two 5-gallon containers inside the waste storage shed that were unlabeled.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Location: New Industries LLC		
City: Morgan City	County/Parish: St. Mary	State: Louisiana



Photo No. 5

Photo File Name: DSCN7907

Date of Photo: 3/27/2025

Time of Photo: 1005 hrs.

Photographer: Vince Damiano

Description: Another view of one of the 5-gallon containers inside the waste storage shed that was unlabeled and a waste determination had not been made.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Location: New Industries LLC		
City: Morgan City	County/Parish: St. Mary	State: Louisiana



Photo No. 6

Photo File Name: DSCN7908

Date of Photo: 3/27/2025

Time of Photo: 1005 hrs.

Photographer: Vince Damiano

Description: Another view of one of the 5-gallon containers inside of the waste storage shed that was unlabeled and a waste determination had not been made.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Location: New Industries LLC		
City: Morgan City	County/Parish: St. Mary	State: Louisiana



Photo No. 7

Photo File Name: DSCN7909

Date of Photo: 3/27/2025

Time of Photo: 1007 hrs.

Photographer: Vince Damiano

Description: Overview of the waste storage shed with a no-smoking sign posted outside of the locked fence.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Location: New Industries LLC		
City: Morgan City	County/Parish: St. Mary	State: Louisiana



Photo No. 8

Photo File Name: DSCN7910

Date of Photo: 3/27/2025

Time of Photo: 1007 hrs.

Photographer: Vince Damiano

Description: View of the used oil filter container outside of the waste storage shed which contains the words "Used Oil Filters" on the yellow label.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Location: New Industries LLC		
City: Morgan City	County/Parish: St. Mary	State: Louisiana



Photo No. 9

Photo File Name: DSCN7911

Date of Photo: 3/27/2025

Time of Photo: 1008 hrs.

Photographer: Vince Damiano

Description: View of a full 55-gallon drum of used oil, which was unlabeled outside of the waste storage shed.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Location: New Industries LLC		
City: Morgan City	County/Parish: St. Mary	State: Louisiana



Photo No. 10

Photo File Name: DSCN7912

Date of Photo: 3/27/2025

Time of Photo: 1010 hrs.

Photographer: Vince Damiano

Description: View of a quarter-full 5-gallon container storing used oil that was unlabeled, observed in the used oil storage area.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Location: New Industries LLC		
City: Morgan City	County/Parish: St. Mary	State: Louisiana



Photo No. 11

Photo File Name: DSCN7913

Date of Photo: 3/27/2025

Time of Photo: 1010 hrs.

Photographer: Vince Damiano

Description: View of a quarter-full 5-gallon container of used oil and a 5-gallon container of used oil filters that were unlabeled, observed in the used oil storage area.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Location: New Industries LLC		
City: Morgan City	County/Parish: St. Mary	State: Louisiana



Photo No. 12

Photo File Name: DSCN7914

Date of Photo: 3/27/2025

Time of Photo: 1010 hrs.

Photographer: Vince Damiano

Description: View of three half-full 5-gallon containers (yellow and blue) that were storing used oil and were unlabeled in the used oil storage area. The other containers were empty.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Location: New Industries LLC		
City: Morgan City	County/Parish: St. Mary	State: Louisiana



Photo No. 13

Photo File Name: DSCN7915

Date of Photo: 3/27/2025

Time of Photo: 1010 hrs.

Photographer: Vince Damiano

Description: View of a full 55-gallon container storing used oil that was unlabeled, observed in the used oil storage area.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Location: New Industries LLC		
City: Morgan City	County/Parish: St. Mary	State: Louisiana



Photo No. 14

Photo File Name: DSCN7916

Date of Photo: 3/27/2025

Time of Photo: 1027 hrs.

Photographer: Vince Damiano

Description: View of two empty 1-gallon paint containers observed in the process yard; these containers appeared to be accumulating rainwater.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Location: New Industries LLC		
City: Morgan City	County/Parish: St. Mary	State: Louisiana



Photo No. 15

Photo File Name: DSCN7917

Date of Photo: 3/27/2025

Time of Photo: 1008 hrs.

Photographer: Vince Damiano

Description: Another view of one of the empty paint containers observed in the process yard.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Location: New Industries LLC		
City: Morgan City	County/Parish: St. Mary	State: Louisiana



Photo No. 16

Photo File Name: DSCN7918

Date of Photo: 3/27/2025

Time of Photo: 1008 hrs.

Photographer: Vince Damiano

Description: Another view of one of the empty paint containers observed in the process yard.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Location: New Industries LLC		
City: Morgan City	County/Parish: St. Mary	State: Louisiana



Photo No. 17

Photo File Name: DSCN7919

Date of Photo: 3/27/2025

Time of Photo: 1008 hrs.

Photographer: Vince Damiano

Description: Another empty paint container that was observed in the process yard.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Location: New Industries LLC		
City: Morgan City	County/Parish: St. Mary	State: Louisiana



Photo No. 18

Photo File Name: DSCN7920

Date of Photo: 3/27/2025

Time of Photo: 1008 hrs.

Photographer: Vince Damiano

Description: View of another empty paint container that was observed in the process yard.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Location: New Industries LLC		
City: Morgan City	County/Parish: St. Mary	State: Louisiana



Photo No. 19

Photo File Name: DSCN7921

Date of Photo: 3/27/2025

Time of Photo: 1008 hrs.

Photographer: Vince Damiano

Description: View of a $\frac{3}{4}$ full 55-gallon drum containing unpunctured aerosol cans in the Carpenter Shop area. This drum was not properly labeled.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Location: New Industries LLC		
City: Morgan City	County/Parish: St. Mary	State: Louisiana



Photo No. 20

Photo File Name: DSCN7922

Date of Photo: 3/27/2025

Time of Photo: 1008 hrs.

Photographer: Vince Damiano

Description: View of a full 55-gallon drum containing unpunctured aerosol cans in the Carpenter Shop area. This drum was not properly labeled.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Location: New Industries LLC		
City: Morgan City	County/Parish: St. Mary	State: Louisiana



Photo No. 21

Photo File Name: DSCN7923

Date of Photo: 3/27/2025

Time of Photo: 1008 hrs.

Photographer: Vince Damiano

Description: Another view of the two 55-gallon drums of unpunctured aerosol cans in the Carpenter Shop.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Location: New Industries LLC		
City: Morgan City	County/Parish: St. Mary	State: Louisiana



Photo No. 22

Photo File Name: DSCN7924

Date of Photo: 3/27/2025

Time of Photo: 1008 hrs.

Photographer: Vince Damiano

Description: A view of the hand-held puncturing mechanism used by New Industries at the time of the inspection.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Location: New Industries LLC		
City: Morgan City	County/Parish: St. Mary	State: Louisiana



Photo No. 23

Photo File Name: DSCN7925

Date of Photo: 3/27/2025

Time of Photo: 1008 hrs.

Photographer: Vince Damiano

Description: A view of two full 55-gallon drums storing punctured aerosol cans in the Carpenter Shop.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Location: New Industries LLC		
City: Morgan City	County/Parish: St. Mary	State: Louisiana



Photo No. 24

Photo File Name: DSCN7926

Date of Photo: 3/27/2025

Time of Photo: 1008 hrs.

Photographer: Vince Damiano

Description: A view inside one of the full 55-gallon drums storing punctured aerosol cans in the Carpenter Shop.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Location: New Industries LLC		
City: Morgan City	County/Parish: St. Mary	State: Louisiana



Photo No. 25

Photo File Name: DSCN7927

Date of Photo: 3/27/2025

Time of Photo: 1008 hrs.

Photographer: Vince Damiano

Description: A view inside the other full 55-gallon drums storing punctured aerosol cans in the Carpenter Shop.

APPENDIX 2. 4/4/25 RESPONSE FROM NEW INDUSTRIES

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:

- Unlabeled universal waste lamps/bulbs with no accumulation start date
 - Lamps/bulbs have been transferred into containers to better manage this type of waste. Additionally, some bulbs have been accepted by our waste contractor while others are scheduled for pick up in the near future. All Lamp/bulb accumulation containers are labeled.
- 5-gallon and 55-gallon containers storing used oil that were not labeled as used oil
 - Used oil containers have been consolidated and labeled as used oil. Some used oil has already been accepted by our waste contractor while others are scheduled for pick up in the near future.
- Four 5-gallon and one 10-gallon container in waste accumulation area that were not labeled; please perform a waste determination
 - Containers in the accumulation area have been reviewed and placed in the appropriate waste streams.
- Aerosol can puncturing area:
 - Universal waste aerosol cans must be managed in a way that prevents releases of universal waste to the environment
 - The company has purchased and implemented the use of an aerosol can recycler/containment system.
 - Unlabeled universal waste
 - All cans that were not previously punctured now have been punctured and have been placed in accumulation drums which are labeled “Universal Waste – Aerosol Cans”
 - A small quantity handler of universal waste must recycle the empty punctured aerosol cans and meet the following requirements set forth in 40 CFR 273.13(e)(4).
 - Contents from the punctured cans are accumulated and labeled “Paint Waste” to be properly disposed of. Empty/punctured cans accumulated will then be placed in scrap metal bins for recycling.

Please review the universal waste regulations 40 CFR 273.13(e) (Standards of Universal Waste Management).





