United States Environmental Protection Agency

Region 6 - Enforcement & Compliance Assurance Division

INSPECTION REPORT

Inspection Date(s):	11/07/2024	
Media Program:	Air	
Regulatory Program(s)	NESHAP, SIP	
Company Name:	**HPC Industrial Services LLC**	
Facility Name:	**Norco Oil Recovery Facility**	
Facility Physical Location:	15536 River Road	
(city, state, zip code)	Norco, LA 70079	
Mailing address:	15536 River Road	
(city, state, zip code)	Norco, LA 70079	
County/Parish:	St. Charles Parish	
Facility Phone Number	225-681-0878	
Facility Contact:	Jeremy Leonick	Director
	jeremy.leonick@hpc-industrial.com	
FRS Number:	110044317691	
Identification/Permit Number:	Agency Interest # 160461 / Permit # 2520-00164-01	
Media Identifier Number:	AFS # 22-089-00164	
NAICS:	562213 (Solid Waste Combustors and Incinerators)	
SIC:	1389 (Oil and Gas Field Services)	
Personnel participating in inspection:		
James Haynes	EPA Region 6 ECDAT	Physical Scientist
Ben Rosenthal	EPA Region 6 ECDAT	Physical Scientist
Sophia Ong	EPA Region 6 ECDAT	Physical Scientist
Jeremy Leonick	HPC Industrial Services, LLC	Director
Robert Basl	EHS Technology Group, LLC	Consultant
EPA Lead Inspector Signature/Date	JAMES HAYNES Digitally signed by JAMES HAYNES Date: 2025.02.10 14:51:27 -06'00'	
	James Haynes	Date
Supervisor Signature/Date	Leathers, James Digitally signed by Leathers, James Date: 2025.02.10 15:34:25 -06'00'	
	James Leathers	Date

Section I – INTRODUCTION

PURPOSE OF THE INSPECTION

I, James Haynes, with Ben Rosenthal and Sophia Ong, EPA inspectors, arrived at HPC Industrial Services LLC's Norco Oil Recovery Facility (the "Facility" or "NORF") at 13:30 on November 7, 2024, for an unannounced inspection. We met with Mr. Jeremy Leonick, Director with HPC Industrial Services, and Mr. Robert Basl, consultant for the Facility. I presented my inspector credentials to Mr. Leonick and informed him that this was an EPA inspection to evaluate compliance with the Clean Air Act ("CAA"), implementing regulations of the CAA such as 40 C.F.R. Part 61 Subpart FF ("Benzene Waste Operations NESHAP" or "BWON"), and the Facility's air permit. The scope of the inspection is a partial compliance evaluation ("PCE").

FACILITY DESCRIPTION

The Norco Oil Recovery Facility treats oily sludges and cake waste materials by dewatering, drying, and recovering oil through the application of centrifuge and thermal desorption processes. The centrifuge process dewaters the sludge and recovers much of the oil, and the thermal desorption process utilizes an indirect-fired anaerobic thermal desorption unit ("ATDU") that dries the dewatered cake into ash and includes a vapor recovery system to recover the remaining oil. Vapors from the ATDU are routed to and controlled by a thermal oxidizer. The dried ash is transported off-site for disposal.

Section II - OBSERVATIONS

Following the opening conference, I informed Mr. Leonick that the focus of the inspection was on BWON, and we would focus on controlled benzene wastes received from refineries and chemical plants across the U.S.

NORF receives waste in roll-off boxes, vacuum trucks, vacuum boxes, and other mobile shipping containers. For controlled benzene wastes, NORF must comply with the standards in 40 C.F.R. §§ 61.343 through 61.347 at each waste management unit. A waste management unit is a piece of equipment, structure, or transport mechanism used in handling, storage, treatment, or disposal of waste. Examples of a waste management unit include a tank, surface impoundment, container, oil-water separator, individual drain system, steam stripping unit, thin-film evaporation unit, waste incinerator, and landfill.

As part of the inspection, we conducted Method 21 monitoring using Thermo Environmental Instruments' Toxic Vapor Analyzer ("TVA") Model 2020 and conducted observations of the process equipment with a Teledyne FLIR Gx620, an intrinsically safe optical gas imaging ("OGI") camera.

We began our field activity near the thermal oxidizer, ATDU, quench scrubber, and oil water separator. In this area of the Facility, we observed significant hydrocarbon odors near the quench scrubber and oil water separator. Our monitoring at the oil water separator caused the TVA instrument to flame out after the detector was overwhelmed by the rich vapors coming from an access hatch, in excess of 10,000 parts per million (Appendix 1 - Photo No. 1). NORF later collected a Summa canister sample on December 4, 2024, that was analyzed using EPA Method TO-15. The result indicated a benzene concentration of 250 micrograms per cubic meter, or approximately 78 parts per billion.

We walked to the southern portion of the Facility where waste is received at the Facility. Pumpable liquids, sludges, and slurries received in vacuum trucks are pumped into mix tanks for holding before they can be processed in the centrifuge. Other wastes that cannot be pumped are placed in the Facility's "3-Sided Box" where it can be loaded into the solids hopper that feeds a conveyer system to the ADTU (Appendix 1 - Photo No. 3).

We observed the backup control device to the thermal oxidizer, the shaker screen, the centrifuge and separator box, the "3-Sided Box" and solids hopper, and a sump that operates as a final oil water separator before discharging the Facility's wastewater to the co-located refinery. In this area, we observed significant oil staining below the centrifuge at the separator box (Appendix 1 - Photo No. 2). We also noted that the "3-Sided Box" and solids hopper are open to the atmosphere. See AOC 1.

While in the southern portion of the Facility, I observed the thermal oxidizer using the OGI camera and noted a plume of hydrocarbons trailing from the stack (Appendix 1 - Photo No. 4). See AOC 2.

We ended the field activity and returned to the office module. I conducted a closing conference at 17:00. We summarized the observations from our field activity.

Section III – AREAS OF CONCERN

The following Areas of Concern were developed after the on-site inspection:

1) I reviewed a subset of records documenting the types of waste NORF receives (i.e., bills of lading). During the third quarter of 2024, NORF received wastes from 22 sites. Some of these wastes are identified as BWON-controlled wastes; therefore, NORF must manage each of these wastes pursuant to 40 C.F.R. §§ 61.343 through 61.347 at each waste management unit. Based on the visual defects at the separator box below the centrifuge, because the "3-Sided Box" and solids hopper were open to the atmosphere, and the detectable emissions at the oil water separator, NORF may not be managing controlled BWON wastes in accordance with the requirements of the rule.

2) I reviewed the OGI video of hydrocarbons trailing from the thermal oxidizer. The plume may indicate that the combustion unit is not achieving the required efficiency. The thermal oxidizer is the control device for waste management units at the Facility.

Section IV – FOLLOW UP

EPA requested additional information following the inspection on November 19, 2024.

Section V – LIST OF APPENDICES

Appendix 1 – Photograph Log

Appendix 1

Photograph Log

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 1

Location: HPC Industrial Services LLC / Norco Oil Recovery Facility		
City: Norco	Parish: St. Charles Parish	State: LA

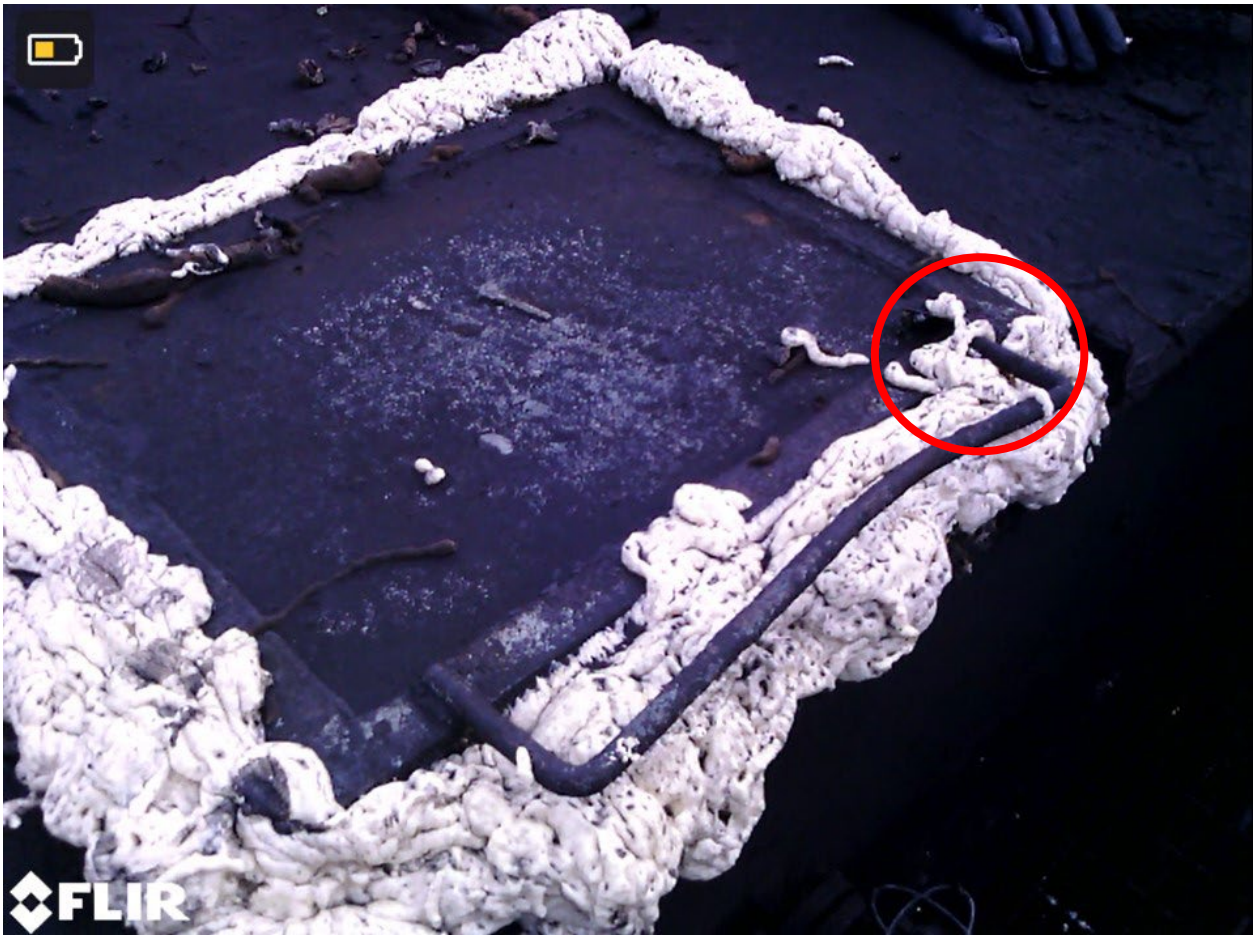

Photo File Name:	FLIR0081-snip.jpg
Date of Photo:	11/07/2024
Time of Photo:	15:23
Photographer:	James Haynes
Description:	Still image from FLIR0081.mp4 video • Circled in Red: location of flameout on hatch of oil water separator downstream of quench scrubber

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 2

Location: HPC Industrial Services LLC / Norco Oil Recovery Facility		
City: Norco	Parish: St. Charles Parish	State: LA

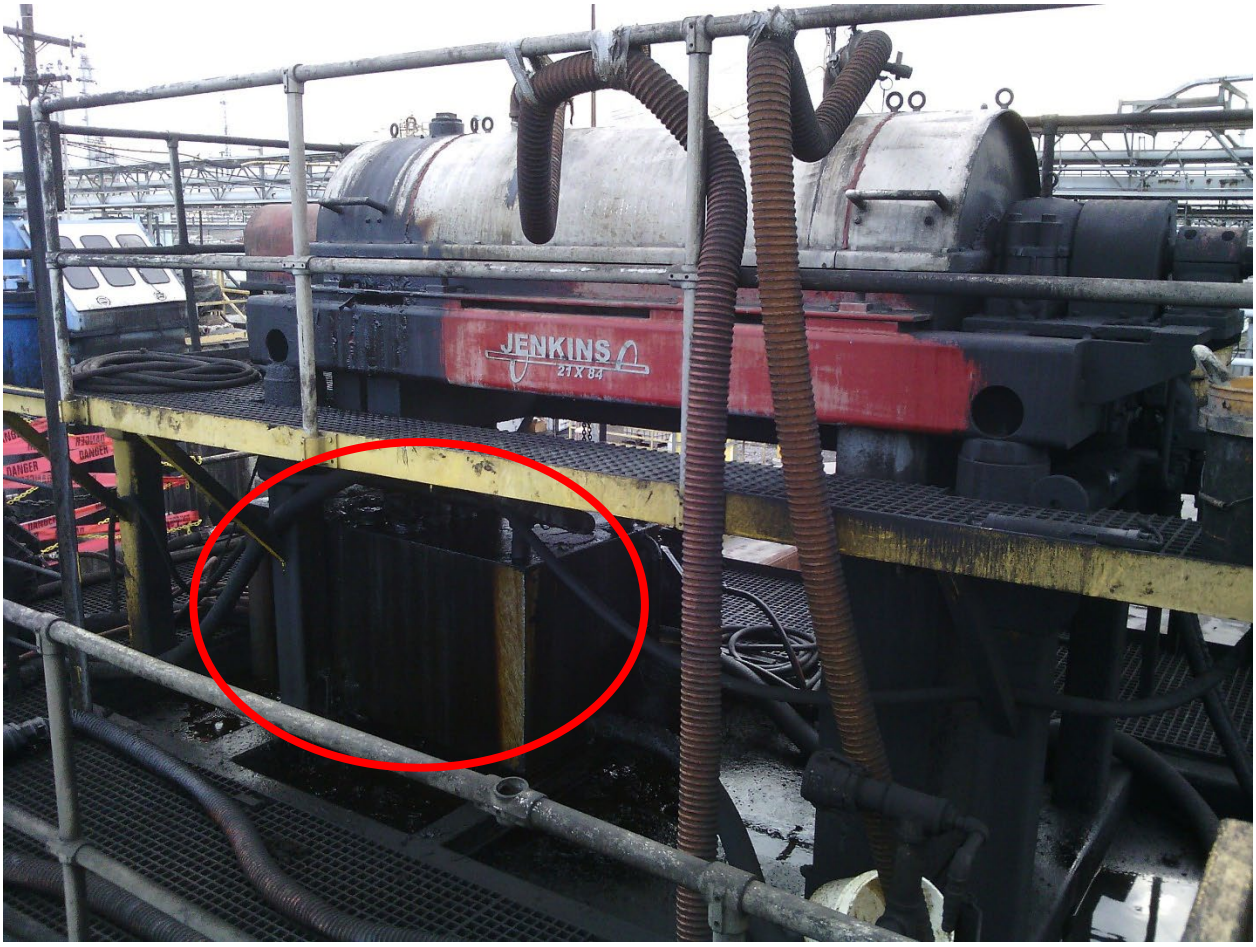

Photo File Name:	FLIR0085.jpg
Date of Photo:	11/07/2024
Time of Photo:	16:12
Photographer:	James Haynes
Description:	Photograph in southern portion of the Facility • Circled in Red: significant oil staining at the separator box below the centrifuge

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 3

Location: HPC Industrial Services LLC / Norco Oil Recovery Facility		
City: Norco	Parish: St. Charles Parish	State: LA

Photo File Name:	FLIR0086.jpg
Date of Photo:	11/07/2024
Time of Photo:	16:13
Photographer:	James Haynes
Description:	Photograph in southern portion of the Facility • Circled in Red: open solids hopper used to feed a conveyer system into the ADTU • Circled in Yellow: open “3-Sided Box” used to store solids prior to loading into the hopper

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 4

Location: HPC Industrial Services LLC / Norco Oil Recovery Facility		
City: Norco	Parish: St. Charles Parish	State: LA

Photo File Name:	FLIR0083-snip.jpg
Date of Photo:	11/07/2024
Time of Photo:	15:47
Photographer:	James Haynes
Description:	Still image from FLIR0083.mp4 video • Circled in Red: hydrocarbon plume trailing from NORF's thermal oxidizer