

Region 6 - Enforcement & Compliance Assurance Division
INSPECTION REPORT

Inspection Date(s):	03/06-09/2023	
Media Program:	RCRA Compliance Evaluation Inspection	
Regulatory Program(s)	RCRA Large Quantity Generator	
Company Name:	TotalEnergies Petrochemicals & Refining USA Inc.	
Facility Name:	TotalEnergies Carville Polystyrene Plant	
Facility Physical Location:	6225 LA-75	
(city, state, zip code)	Carville, LA 70721	
Mailing address:	PO Box 98	
(city, state, zip code)	Carville, LA 70721	
County/Parish:	Iberville Parish	
Facility Phone Number	(225) 642-4300	
Facility Contact:	Casey Crow	HSE Manager
	Casey.crow@totalenergies.com	
FRS Number:	110070827758	
Identification/Permit Number:	N/A	
Media Identifier Number:	LAD980875603	
NAICS:	325211 - Plastics Material and Resin Manufacturing	
SIC:	2821 – Plastics Materials And Resins	
Personnel participating in inspection:		
Elizabeth Pham	EPA Region 6 (ECDSR)	Lead Inspector
John Penland	EPA Region 6 (ECDSR)	Inspector
Terry Dedon	LDEQ	Staff Scientist
Jimbo Earles	LDEQ	Inspector
Karen Price	LDEQ	Sr. Environmental Scientist
Dewayne Logan	LDEQ	Environmental Scientist
Casey Crow	TotalEnergies	HSE Manager
Jill Lamberth	TotalEnergies	Environmental Group Leader
Greg Johnson	TotalEnergies	Environmental Engineer
Ashley Rabalais	TotalEnergies	Operations Manager
EPA Lead Inspector Signature/Date		
	Elizabeth Pham	Date
Supervisor Signature/Date		
	Jeff Yurk	Date

Section I – INTRODUCTION

PURPOSE OF THE INSPECTION

During the week of March 6, 2023, I, Elizabeth Pham, conducted an unannounced inspection of the TotalEnergies Petrochemicals & Refining USA Inc. – Carville Polystyrene Plant (TotalEnergies) located at 6225 LA-75, Carville, Louisiana for compliance with the Resource Conservation and Recovery Act (RCRA). I was assisted on this inspection by Environmental Protection Agency (EPA) inspector, John Penland and Louisiana Division of Environmental Quality (LDEQ) investigators, Jimbo Earles, Karen Price, Terry Dedon, and Dewayne Logan. The inspection included walkthroughs of the facility's hazardous waste generation and management units and a review of the facility records related to hazardous waste management.

The TotalEnergies facility was targeted for inspection as part of the National Compliance Initiative for Air Emissions in Hazardous Waste Management Units and hazardous waste facilities located in or near Environmental Justice communities.

We concluded the inspection of the TotalEnergies facility on March 9, 2023, with a closing conference where we presented our provisional areas of concern.

This report serves as documentation of all onsite activities and observations during the inspection of the TotalEnergies facility. Photographs taken during the inspection to document onsite observations are included as Appendix 1. A summary of all areas of concern identified during the inspection is provided in Section III of this report.

FACILITY DESCRIPTION

The Carville Polystyrene Plant of the TotalEnergies facility operates 24 hours per day, 7 days per week, 52 weeks a year with approximately 220 TotalEnergies employees and 170 nested contractors. TotalEnergies produces polystyrene by continuous polymerization of styrene monomer in liquid phase reactor systems. Unreacted styrene is flashed off in vacuum devolatilizers and the molten polymer is extruded and pelletized. Polystyrene granules are air conveyed to large storage silos prior to loading for rail or truck shipment.

The production lines, numbered 1 through 5, have rated annual production capacities of approximately 200 million pounds each for lines 1 and 2, 400 million pounds for line 3, 350 million pounds for line 4, and 600 million pounds for line 5. Texas Energy Poverty Research Institute (TEPRI) permanently shut down a portion of Line 2 (Line 1 idled), resulting in an annual capacity of 1.55 billion pounds of polystyrene. Two types of polystyrene, high impact and crystal, are produced in various grades. In the production of high impact polystyrene, ground rubber is dissolved in the feed styrene monomer prior to introduction to the reactors.

Utility systems and ancillary equipment include hot oil heaters, cooling towers, wastewater collection systems, storage for raw materials, additives and finished products, and thermal oxidizers and flares for control of air emissions.

A general map of the plant is included in Appendix 2.

The TotalEnergies facility was issued the EPA ID# LAD980875603 and is operating as a Large Quantity Generator (LQG) of hazardous waste.

Section II - OBSERVATIONS

We conducted the onsite inspection during normal business hours from the 6th through the 9th of March 2023. During this inspection, Line 1 and Line 2 was out of service but the remainder of the facility was operating normally. Throughout the week, we visited each of the facility's waste and hazardous secondary material (HSM) generation, accumulation, and management areas. We also reviewed the facility's operating records pertaining to the facility's RCRA applicability and compliance requirements.

This section provides an abbreviated description of our daily activities. Detailed notes summarizing the inspection activities and findings were provided to the TotalEnergies representatives following each inspection day and are included as Appendix 4 of this report. Unless otherwise specified, the statements cited in this section reflect those claims made by facility personnel or documents reviewed during the inspection.

March 6, 2023

We entered the facility at approximately 0930 hrs. where we presented our credentials to Mr. Casey Crow and Ms. Jill Lamberth and informed them we were there to conduct an inspection of the facility under Section 3007 of the Resource Conservation and Recovery Act (RCRA). We were accompanied by state representatives of Louisiana Division of Environmental Quality (LDEQ), Jimbo Earles, Karen Price, Terry Dedon, and Dewayne Logan. The opening conference sign-in sheet is shown in Appendix 3. I discussed the purpose of EPA's inspection and explained the right of TotalEnergies to assert a Confidential Business Information claim for records requested by EPA, see under Title 40 of the Code of Federal Regulations section 2.203 (40 CFR §2.203), and presented the initial request for compliance records.

Following the opening briefing, we conducted a walkthrough of the TotalEnergies facility's storage and processing areas. See Appendix 4 for notes regarding our observations. We departed the TotalEnergies facility at approximately 1615 hrs.

March 7, 2023

We entered the facility at approximately 0930 hrs. and reviewed our observations from the previous day and discussed corrective actions made with the TotalEnergies representatives. Following this review, we continued the walkthrough of TotalEnergies facility's storage and processing areas. See Appendix 4 for notes regarding our observations. We began an initial review of contingency plan, weekly inspection records, process diagrams, training records, and waste profiles. We departed the TotalEnergies facility at approximately 1600 hrs.

March 8, 2023

We entered the facility at approximately 0930 hrs. and reviewed our observations from the previous day and discussed corrective actions made with the TotalEnergies representatives. Following this review, we continued the walkthrough of TotalEnergies facility's storage and processing areas. See Appendix 4 for notes regarding our observations. We conducted a review of documents and reviewed Land Disposal Restriction (LDR) forms, weekly inspection records, waste profiles, analytical sheets, training records, contingency plan, and Emergency Response Procedure (ERP) documents. We departed the TotalEnergies facility at approximately 1545 hrs.

March 9, 2023

We entered the facility at approximately 0930 hrs. and reviewed our observations from the previous day and discussed corrective actions made with the TotalEnergies representatives. Following this review, we discussed in depth with the facility about production process, solid waste definition, standards for satellite accumulation area and standards for Contingency Plan. We conducted a closing briefing where we summarized our inspection activities and preliminary findings (see Section III for more detail). The closing conference sign-in sheet is shown in Appendix 3.

Section III – AREAS OF CONCERN

Satellite Accumulation Area – Failure to meet the conditions of satellite accumulation area (SAA) regulations for large quantity generators pursuant to 40 CFR 262.15.

SAA #1 next to Central Accumulation Area (CAA)

On March 6, 2023, we saw the SAA located next to the CAA (Appendix 1, Photo No. 21). Mr. Crow explains that the contents are generated from the different process lines and accumulated in buckets then is walked over to be poured into the drums at this SAA. On first impression, this SAA does not meet the definition of 40 CFR 262.15(a) and concerns that the drums placed in this SAA is not "...near any point of generation where wastes initially accumulate which is under the control of the operator of the process generating the waste...".

On Drum #23-063 H.C. Filter, the lid was bent with no gasket so therefore, it was incapable of closing or containing the waste as defined under 40 CFR 262.15(a)(4) (Appendix 1, Photo No. 28).

SAA #2 near Line 1

On March 7, 2023, we identified the SAA near Unit 1 and the loading racks by the railroad. Similar to the SAA #1, the wastes are generated from the different process lines and accumulated in buckets then walked over to be poured into the drums at this SAA (Appendix 1, Photo No. 55). On first impression, this SAA does not meet the definition of 40 CFR 262.15 and concerns that the drums placed in this SAA is not "...near any point of generation where wastes initially accumulate which is under the control of the operator of the process generating the waste...".

SAA #3 outside of laboratory

On March 7, 2023, we identified a SAA outside of the laboratory (Appendix 1, Photo No. 46). On first impression, this SAA does not meet the definition of 40 CFR 262.15 and concerns that the

drums placed in this SAA is not "...near any point of generation where wastes initially accumulate which is under the control of the operator of the process generating the waste..." .

Open MEK waste container

On March 7, 2023, we identified a container of MEK waste that was opened and unlabeled during time of inspection inside the laboratory, therefore did not meet the SAA standards 40 CFR 262.15(a)(4) and 40 CFR 262.15(a)(5) (Appendix 1, Photo No. 45).

Solid Waste – Failure to discard hazardous solid waste pursuant to 40 CFR 261.2(a)(2)(i)(A).

Line 5

On March 7, 2023, we observed a hazardous waste spill from the hydrocarbon contaminated filters (Appendix 1, Photo No. 36-37). Mr. Crow explains this is from the removal of filters from the filter canisters. We also observed spills of sludge removed from the wastewater sump present from the skimmer in this unit [Photo No. 51]. Since these two spills were not promptly cleaned up, we determined the materials to be abandoned as defined in 40 CFR 261.2(a)(2)(i)(A).

Line 3

On March 7, 2023, we observed spills of sludge removed from the wastewater sump present from the skimmer in this unit (Appendix 1, Photo No. 53). Since the spill was not promptly cleaned up, we determined the material to be abandoned as defined in 40 CFR 261.2(a)(2)(i)(A).

Tank 19-B

On March 8, 2023, we observed spills of sludge present in the secondary containment for Tank 19-B. Mr. Crow explains this was sludge from wastewater sump back-up. Since the spill was not promptly cleaned up, we determined the material to be abandoned as defined in 40 CFR 261.2(a)(2)(i)(A).

On March 9, 2023, we conducted a tabletop discussion of Tank 19-B facility representative. We expressed concerns that the waste in Tank 19-B may qualify as spent material or a solvent listing of F003. During the inspection, we determined that the facility must demonstrate it meets the compliance requirements of 40 CFR 261.4(a)(23) if the facility chooses to manage the material as a hazardous secondary material or the facility must manage this waste as hazardous based on the definition of solid waste 40 CFR 261.2(c)(3).

Steam-Out Area

On March 6, 2023, we observed hazardous waste (D001) being accumulated on the ground (Appendix 1, Photo No. 30). The unit is used for cleaning containers and process equipment and was extensively stained at the time of inspection. The unit is surrounded by an unsecured tarp on 3 sides which allow material to be released from the unit during power washing. The tarp is in poor condition and the waste is visible on nearby walls and process equipment from drag-out and overspray (Appendix 1, Photo No. 31-33). Hazardous waste is generated and not contained pursuant to 40 CFR 262.17(a)(1)(ii) and since the hazardous waste was not promptly cleaned up, we determined the material to be abandoned as defined in 40 CFR 261.2(a)(2)(i)(A).

Contingency Plan – Failure to provide complete content of contingency plan 40 CFR 262.261

Distribution

On March 9, 2023, we conducted a tabletop review of the facility's Contingency Plan. At the time of EPA's inspection, TotalEnergies was not able to locate a record confirming that it submitted its most recent Contingency Plan to the local Emergency Planning Committee pursuant to 40 CFR 262.262(a). TotalEnergies addressed this issue on March 29, 2023, by providing an electronic copy of the plan to the local Emergency Planning Committee.

Emergency Coordinators

On March 9, 2023, we conducted a tabletop review of the facility's Contingency Plan. At the time of EPA's inspection, we were unable to identify a list of emergency coordinators in the Contingency Plan pursuant to 40 CFR 262.261(d).

Universal Waste

Paint Cans RCRA empty

On March 8, 2023, we identified a shed in the painting and blasting yard where we observed 5 cans of waste paint being drained to dry out (Appendix 1, Photo No. 64-65). The facility explains that this process of drying out the cans includes disposing the paint into the spent paint thinner drum and then letting the contents drip into other cans until dried out then disposing the dried out can in the scrap metal drum and repeating this process. Since the residues did not remain in RCRA empty containers pursuant to 40 CFR 261.7(a)(1), they are subject to regulation 40 CFR 261.7(a)(2). During the time of inspection, we observed that this process entails evaporation of solvents from waste and may be considered treatment pursuant to the definition of "treatment" in 40 CFR 260.10.

Aerosol Cans

On March 8, 2023, we identified waste aerosol cans placed in an opened 5-gallon container in the paint shed, therefore the universal waste aerosol cans were not accumulated in a container that meets the requirements of 40 CFR 273.33(e)(1) (Appendix 1, Photo No. 66).

On March 8, 2023, we identified waste aerosol cans placed in an unlabeled 5-gallon container in the paint shed, therefore the universal waste aerosol cans were not marked clearly with the requirements of 40 CFR 273.34(f) (Appendix 1, Photo No. 66).

On March 9, 2023, we reviewed the waste profile for the aerosol cans. During this review, we identified D003 missing from the waste profile, therefore an incomplete characterization was made pursuant to 40 CFR 262.11. TotalEnergies later added D003 to the waste profile for spent aerosol cans and provided EPA a copy of the updated profile on March 30, 2023.

Spent Solvents

On March 8, 2023, we identified a container with spent thinner and a container with waste paint in the paint shed (Appendix 1, Photo No. 70-71). During the time of inspection, both containers were opened and unlabeled therefore did not meet the requirements of 40 CFR 262.17(a)(1)(iv) and 40 CFR 262.17(a)(5).

Subpart CC – Failure to meet the conditions of Air Emission Standards for Tanks, Surface Impoundments, and Containers

Waste Determinations

On March 8, 2023, we reviewed waste profiles and determined that TotalEnergies failed to document Subpart CC waste determinations pursuant to 40 CFR 265.1084(a).

Land Disposal Restrictions (LDR) – Failure to meet the conditions of Land Disposal Restrictions (LDR) *Underlying hazardous constituents (UHCs)*

On March 8, 2023, we reviewed LDRs and determined that TotalEnergies failed to document UHCs on the LDR Forms pursuant to 40 CFR 268.7.

Section IV – FOLLOW UP

Actions taken by TotalEnergies to resolve any areas of concern were documented by TotalEnergies with photographs or other documentation and submitted to the EPA via the electronic secure online OneDrive. Any information received from TotalEnergies after the inspection will be received via the secure online drive. These documents are accessible by the EPA Enforcement Officer.

Section V – LIST OF APPENDICES

Appendix 1 – Photo Log

Appendix 2 – General Facility Map

Appendix 3 – Opening and Closing Conference Sign-in Sheets

Appendix 4 – EPA Daily Summary E-mails

Appendix 1

Photograph Log

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 1

Location: TotalEnergies Petrochemicals & Refining USA Inc. – Carville Polystyrene Plant		
City: Carville	County/Parish: Iberville	State: Louisiana



Photo #:	DSCN0932.JPG
Date:	3/6/2023
Camera:	Nikon COOLPIX AW120
Photographer:	John Penland
Witness:	Elizabeth Pham, John Penland
Description: External view of the designated hazardous waste container central accumulation area	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 2

Location: TotalEnergies Petrochemicals & Refining USA Inc. – Carville Polystyrene Plant		
City: Carville	County/Parish: Iberville	State: Louisiana



Photo #:	DSCN0933.JPG
Date:	3/6/2023
Camera:	Nikon COOLPIX AW120
Photographer:	John Penland
Witness:	Elizabeth Pham, John Penland
Description: Internal view of the designated hazardous waste container central accumulation area	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 3

Location: TotalEnergies Petrochemicals & Refining USA Inc. – Carville Polystyrene Plant		
City: Carville	County/Parish: Iberville	State: Louisiana

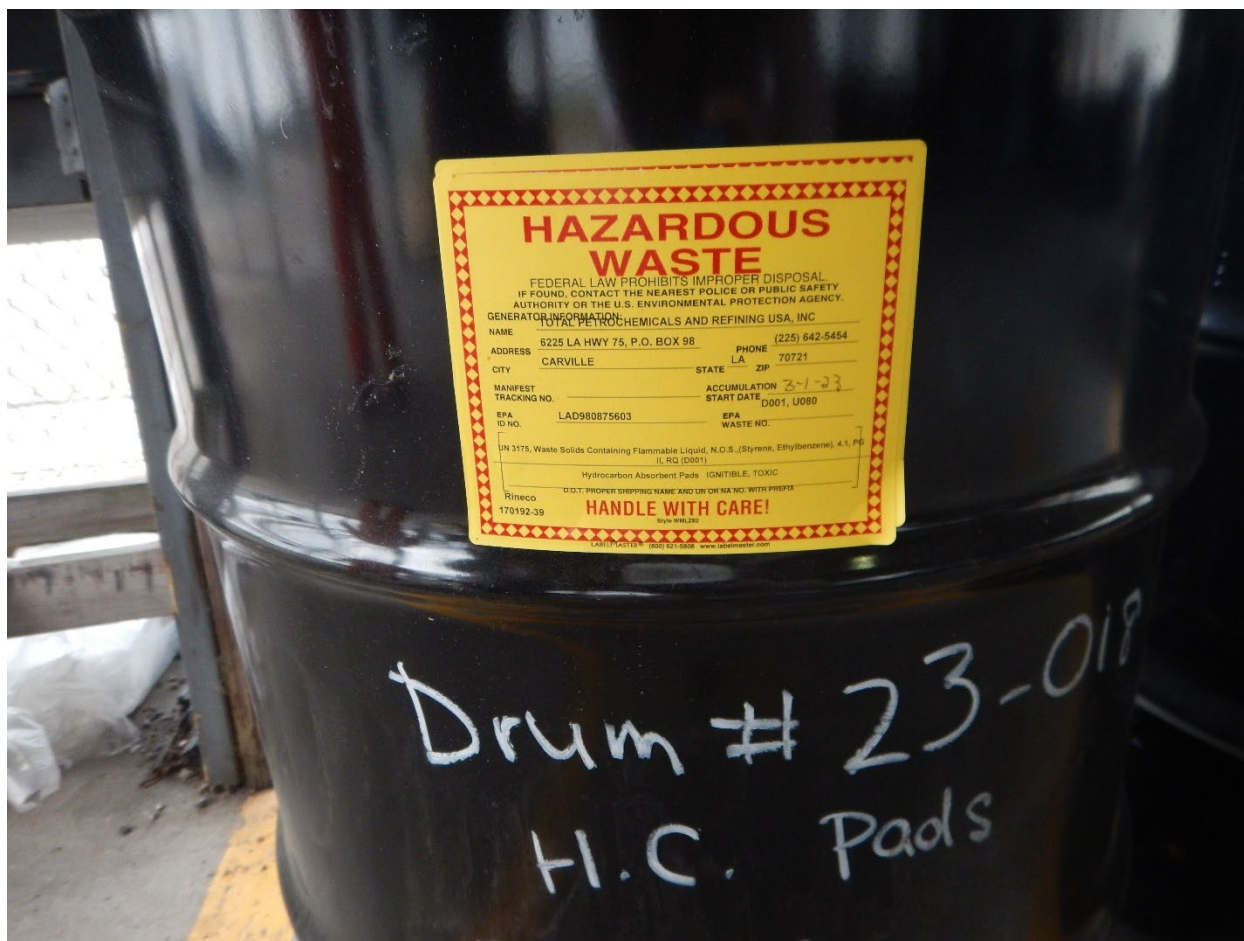


Photo #:	DSCN0934.JPG
Date:	3/6/2023
Camera:	Nikon COOLPIX AW120
Photographer:	John Penland
Witness:	Elizabeth Pham, John Penland
Description: Detail of hazardous waste label on container of hydrocarbon contaminated absorbent pads. D001, U080	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 4

Location: TotalEnergies Petrochemicals & Refining USA Inc. – Carville Polystyrene Plant		
City: Carville	County/Parish: Iberville	State: Louisiana

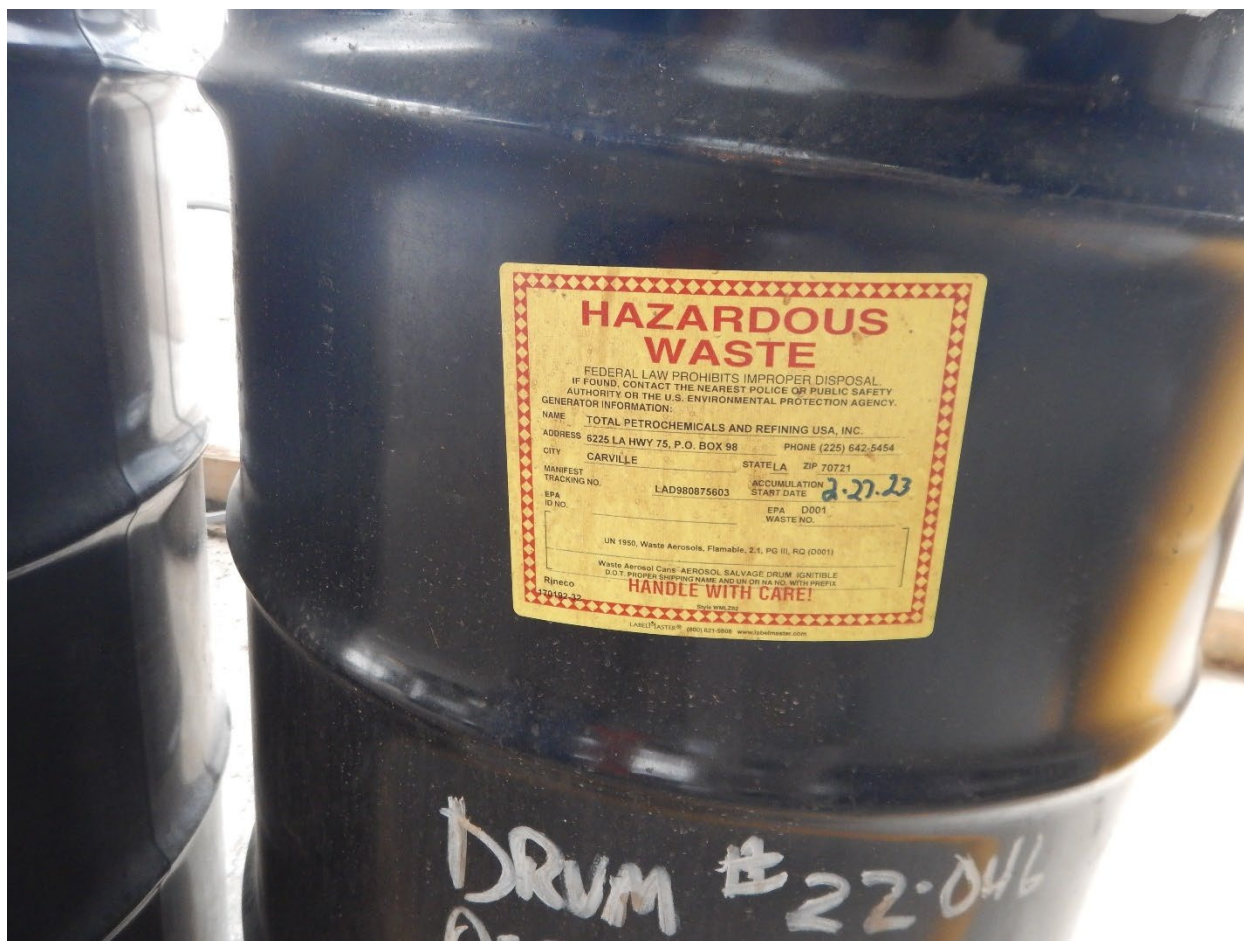


Photo #:	DSCN0935.JPG
Date:	3/6/2023
Camera:	Nikon COOLPIX AW120
Photographer:	John Penland
Witness:	Elizabeth Pham, John Penland
Description: Detail of hazardous waste label on container of waste aerosols. D001	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 5

Location: TotalEnergies Petrochemicals & Refining USA Inc. – Carville Polystyrene Plant		
City: Carville	County/Parish: Iberville	State: Louisiana



Photo #:	DSCN0936.JPG
Date:	3/6/2023
Camera:	Nikon COOLPIX AW120
Photographer:	John Penland
Witness:	Elizabeth Pham, John Penland
Description: Detail of hazardous waste label on container of hydrocarbon contaminated filters. D001	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 6

Location: TotalEnergies Petrochemicals & Refining USA Inc. – Carville Polystyrene Plant		
City: Carville	County/Parish: Iberville	State: Louisiana



Photo #:	DSCN0937.JPG
Date:	3/6/2023
Camera:	Nikon COOLPIX AW120
Photographer:	John Penland
Witness:	Elizabeth Pham, John Penland
Description: Detail of hazardous waste label on container of styrene contaminated sand/soil. D001	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 7

Location: TotalEnergies Petrochemicals & Refining USA Inc. – Carville Polystyrene Plant		
City: Carville	County/Parish: Iberville	State: Louisiana



Photo #:	DSCN0938.JPG
Date:	3/6/2023
Camera:	Nikon COOLPIX AW120
Photographer:	John Penland
Witness:	Elizabeth Pham, John Penland
Description: Detail of non-hazardous waste label on container of spent blast media	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 8

Location: TotalEnergies Petrochemicals & Refining USA Inc. – Carville Polystyrene Plant		
City: Carville	County/Parish: Iberville	State: Louisiana



Photo #:	DSCN0939.JPG
Date:	3/6/2023
Camera:	Nikon COOLPIX AW120
Photographer:	John Penland
Witness:	Elizabeth Pham, John Penland
Description: Container of off-spec styrene located in the hazardous waste container central accumulation area	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 9

Location: TotalEnergies Petrochemicals & Refining USA Inc. – Carville Polystyrene Plant		
City: Carville	County/Parish: Iberville	State: Louisiana



Photo #:	DSCN0940.JPG
Date:	3/6/2023
Camera:	Nikon COOLPIX AW120
Photographer:	John Penland
Witness:	Elizabeth Pham, John Penland
Description: Detail of markings on bin of offspec styrene located in the hazardous waste container central accumulation area	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 10

Location: TotalEnergies Petrochemicals & Refining USA Inc. – Carville Polystyrene Plant		
City: Carville	County/Parish: Iberville	State: Louisiana



Photo #:	DSCN09341.JPG
Date:	3/6/2023
Camera:	Nikon COOLPIX AW120
Photographer:	John Penland
Witness:	Elizabeth Pham, John Penland
Description: Northern half of the hazardous waste container central accumulation area	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 11

Location: TotalEnergies Petrochemicals & Refining USA Inc. – Carville Polystyrene Plant		
City: Carville	County/Parish: Iberville	State: Louisiana



Photo #:	DSCN0942.JPG
Date:	3/6/2023
Camera:	Nikon COOLPIX AW120
Photographer:	John Penland
Witness:	Elizabeth Pham, John Penland
Description: Drums of heat transfer oil contaminated with styrene and ethyl benzene.	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 12

Location: TotalEnergies Petrochemicals & Refining USA Inc. – Carville Polystyrene Plant		
City: Carville	County/Parish: Iberville	State: Louisiana



Photo #:	DSCN0943.JPG
Date:	3/6/2023
Camera:	Nikon COOLPIX AW120
Photographer:	John Penland
Witness:	Elizabeth Pham, John Penland
Description: Unlabeled drums located in the hazardous waste container central accumulation area	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 13

Location: TotalEnergies Petrochemicals & Refining USA Inc. – Carville Polystyrene Plant		
City: Carville	County/Parish: Iberville	State: Louisiana



Photo #:	DSCN0944.JPG
Date:	3/6/2023
Camera:	Nikon COOLPIX AW120
Photographer:	John Penland
Witness:	Elizabeth Pham, John Penland
Description: Unlabeled drums located in the hazardous waste container central accumulation area	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 14

Location: TotalEnergies Petrochemicals & Refining USA Inc. – Carville Polystyrene Plant		
City: Carville	County/Parish: Iberville	State: Louisiana



Photo #:	DSCN0945.JPG
Date:	3/6/2023
Camera:	Nikon COOLPIX AW120
Photographer:	John Penland
Witness:	Elizabeth Pham, John Penland
Description: Unlabeled drums located in the hazardous waste container central accumulation area	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 15

Location: TotalEnergies Petrochemicals & Refining USA Inc. – Carville Polystyrene Plant		
City: Carville	County/Parish: Iberville	State: Louisiana



Photo #:	DSCN0946.JPG
Date:	3/6/2023
Camera:	Nikon COOLPIX AW120
Photographer:	John Penland
Witness:	Elizabeth Pham, John Penland
Description: Unlabeled drums located in the hazardous waste container central accumulation area	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 16

Location: TotalEnergies Petrochemicals & Refining USA Inc. – Carville Polystyrene Plant		
City: Carville	County/Parish: Iberville	State: Louisiana



Photo #:	DSCN0947.JPG
Date:	3/6/2023
Camera:	Nikon COOLPIX AW120
Photographer:	John Penland
Witness:	Elizabeth Pham, John Penland
Description: Unlabeled drums located in the hazardous waste container central accumulation area	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 17

Location: TotalEnergies Petrochemicals & Refining USA Inc. – Carville Polystyrene Plant		
City: Carville	County/Parish: Iberville	State: Louisiana



Photo #:	DSCN0948.JPG
Date:	3/6/2023
Camera:	Nikon COOLPIX AW120
Photographer:	John Penland
Witness:	Elizabeth Pham, John Penland
Description: Unlabeled roll-off container near Line 5. Contents are claimed to be Aluminum Oxide.	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 18

Location: TotalEnergies Petrochemicals & Refining USA Inc. – Carville Polystyrene Plant		
City: Carville	County/Parish: Iberville	State: Louisiana



Photo #:	DSCN0949.JPG
Date:	3/6/2023
Camera:	Nikon COOLPIX AW120
Photographer:	John Penland
Witness:	Elizabeth Pham, John Penland
Description: Hole in tarp of unlabeled roll-off container near Line 5	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 19

Location: TotalEnergies Petrochemicals & Refining USA Inc. – Carville Polystyrene Plant		
City: Carville	County/Parish: Iberville	State: Louisiana



Photo #:	DSCN0950.JPG
Date:	3/6/2023
Camera:	Nikon COOLPIX AW120
Photographer:	John Penland
Witness:	Elizabeth Pham, John Penland
Description: Unlabeled roll-off container near Line 5.	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 20

Location: TotalEnergies Petrochemicals & Refining USA Inc. – Carville Polystyrene Plant		
City: Carville	County/Parish: Iberville	State: Louisiana



Photo #:	DSCN0951.JPG
Date:	3/6/2023
Camera:	Nikon COOLPIX AW120
Photographer:	John Penland
Witness:	Elizabeth Pham, John Penland
Description: Unlabeled roll-off container near Line 5.	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 21

Location: TotalEnergies Petrochemicals & Refining USA Inc. – Carville Polystyrene Plant		
City: Carville	County/Parish: Iberville	State: Louisiana



Photo #:	DSCN0952.JPG
Date:	3/6/2023
Camera:	Nikon COOLPIX AW120
Photographer:	John Penland
Witness:	Elizabeth Pham, John Penland
Description: Claimed satellite accumulation area for Lines 4 and 5 with 6 x 55 gallon containers. 5 labeled as hazardous	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 22

Location: TotalEnergies Petrochemicals & Refining USA Inc. – Carville Polystyrene Plant		
City: Carville	County/Parish: Iberville	State: Louisiana



Photo #:	DSCN0953.JPG
Date:	3/6/2023
Camera:	Nikon COOLPIX AW120
Photographer:	John Penland
Witness:	Elizabeth Pham, John Penland
Description: Non-hazardous waste labeled container located in claimed satellite accumulation area for Lines 4 and 5. Zinc Stearate	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 23

Location: TotalEnergies Petrochemicals & Refining USA Inc. – Carville Polystyrene Plant		
City: Carville	County/Parish: Iberville	State: Louisiana



Photo #:	DSCN0954.JPG
Date:	3/6/2023
Camera:	Nikon COOLPIX AW120
Photographer:	John Penland
Witness:	Elizabeth Pham, John Penland
Description: Hazardous waste labeled container located in claimed satellite accumulation area for Lines 4 and 5. Hydrocarbon Tank Sludge	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 24

Location: TotalEnergies Petrochemicals & Refining USA Inc. – Carville Polystyrene Plant		
City: Carville	County/Parish: Iberville	State: Louisiana



Photo #:	DSCN0955.JPG
Date:	3/6/2023
Camera:	Nikon COOLPIX AW120
Photographer:	John Penland
Witness:	Elizabeth Pham, John Penland
Description: Hazardous waste labeled container located in claimed satellite accumulation area for Lines 4 and 5. Waste aerosols	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 25

Location: TotalEnergies Petrochemicals & Refining USA Inc. – Carville Polystyrene Plant		
City: Carville	County/Parish: Iberville	State: Louisiana



Photo #:	DSCN0956.JPG
Date:	3/6/2023
Camera:	Nikon COOLPIX AW120
Photographer:	John Penland
Witness:	Elizabeth Pham, John Penland
Description: Hazardous waste labeled container located in claimed satellite accumulation area for Lines 4 and 5. Hydrocarbon Contaminated Absorbent Pads	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 26

Location: TotalEnergies Petrochemicals & Refining USA Inc. – Carville Polystyrene Plant		
City: Carville	County/Parish: Iberville	State: Louisiana



Photo #:	DSCN0957.JPG
Date:	3/6/2023
Camera:	Nikon COOLPIX AW120
Photographer:	John Penland
Witness:	Elizabeth Pham, John Penland
Description: Hazardous waste labeled container located in claimed satellite accumulation area for Lines 4 and 5. Hydrocarbon Contaminated Filters	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 27

Location: TotalEnergies Petrochemicals & Refining USA Inc. – Carville Polystyrene Plant		
City: Carville	County/Parish: Iberville	State: Louisiana



Photo #:	DSCN0958.JPG
Date:	3/6/2023
Camera:	Nikon COOLPIX AW120
Photographer:	John Penland
Witness:	Elizabeth Pham, John Penland
Description: Hazardous waste labeled container located in claimed satellite accumulation area for Lines 4 and 5. Styrene and Ethyl Benzene contaminated sand and soil	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 28

Location: TotalEnergies Petrochemicals & Refining USA Inc. – Carville Polystyrene Plant		
City: Carville	County/Parish: Iberville	State: Louisiana



Photo #:	DSCN0959.JPG
Date:	3/6/2023
Camera:	Nikon COOLPIX AW120
Photographer:	John Penland
Witness:	Elizabeth Pham, John Penland
Description: Defective lid on Hazardous waste labeled container located in claimed satellite accumulation area for Lines 4 and 5. Hydrocarbon Contaminated Filters	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 29

Location: TotalEnergies Petrochemicals & Refining USA Inc. – Carville Polystyrene Plant		
City: Carville	County/Parish: Iberville	State: Louisiana



Photo #:	DSCN0960.JPG
Date:	3/6/2023
Camera:	Nikon COOLPIX AW120
Photographer:	John Penland
Witness:	Elizabeth Pham, John Penland
Description: Point of generation for hazardous waste hydrocarbon contaminated filters in Line 4	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 30

Location: TotalEnergies Petrochemicals & Refining USA Inc. – Carville Polystyrene Plant		
City: Carville	County/Parish: Iberville	State: Louisiana



Photo #:	DSCN0961.JPG
Date:	3/6/2023
Camera:	Nikon COOLPIX AW120
Photographer:	John Penland
Witness:	Elizabeth Pham, John Penland
Description: Steam out area located north of Line 4.	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 31

Location: TotalEnergies Petrochemicals & Refining USA Inc. – Carville Polystyrene Plant		
City: Carville	County/Parish: Iberville	State: Louisiana



Photo #:	DSCN0962.JPG
Date:	3/6/2023
Camera:	Nikon COOLPIX AW120
Photographer:	John Penland
Witness:	Elizabeth Pham, John Penland
Description: Steam out area located north of Line 4. Note: waste material staining present on wall of nearby building.	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 32

Location: TotalEnergies Petrochemicals & Refining USA Inc. – Carville Polystyrene Plant		
City: Carville	County/Parish: Iberville	State: Louisiana



Photo #:	DSCN0963.JPG
Date:	3/6/2023
Camera:	Nikon COOLPIX AW120
Photographer:	John Penland
Witness:	Elizabeth Pham, John Penland
Description: Steam out area located north of Line 4. Note: Waste material present outside of containment.	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 33

Location: TotalEnergies Petrochemicals & Refining USA Inc. – Carville Polystyrene Plant		
City: Carville	County/Parish: Iberville	State: Louisiana



Photo #:	DSCN0964.JPG
Date:	3/6/2023
Camera:	Nikon COOLPIX AW120
Photographer:	John Penland
Witness:	Elizabeth Pham, John Penland
Description: Steam out area located north of Line 4. Note: Waste material present outside of containment.	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 34

Location: TotalEnergies Petrochemicals & Refining USA Inc. – Carville Polystyrene Plant		
City: Carville	County/Parish: Iberville	State: Louisiana



Photo #:	DSCN0965.JPG
Date:	3/6/2023
Camera:	Nikon COOLPIX AW120
Photographer:	John Penland
Witness:	Elizabeth Pham, John Penland
Description: Tanks located immediately south of the steam out area in Line 4. Note: Waste material present on tanks	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 35

Location: TotalEnergies Petrochemicals & Refining USA Inc. – Carville Polystyrene Plant		
City: Carville	County/Parish: Iberville	State: Louisiana



Photo #:	DSCN0966.JPG
Date:	3/6/2023
Camera:	Nikon COOLPIX AW120
Photographer:	John Penland
Witness:	Elizabeth Pham, John Penland
Description: Point of generation for hazardous waste hydrocarbon contaminated filters in Line 5	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 36

Location: TotalEnergies Petrochemicals & Refining USA Inc. – Carville Polystyrene Plant		
City: Carville	County/Parish: Iberville	State: Louisiana



Photo #:	DSCN0967.JPG
Date:	3/6/2023
Camera:	Nikon COOLPIX AW120
Photographer:	John Penland
Witness:	Elizabeth Pham, John Penland
Description: Point of generation for hazardous waste hydrocarbon contaminated filters in Line 5. Note: staining and drips present on filter canisters.	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 37

Location: TotalEnergies Petrochemicals & Refining USA Inc. – Carville Polystyrene Plant		
City: Carville	County/Parish: Iberville	State: Louisiana



Photo #:	DSCN0968.JPG
Date:	3/6/2023
Camera:	Nikon COOLPIX AW120
Photographer:	John Penland
Witness:	Elizabeth Pham, John Penland
Description: Spilled material located beneath the point of generation for hazardous waste hydrocarbon contaminated filters in Line 5	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 38

Location: TotalEnergies Petrochemicals & Refining USA Inc. – Carville Polystyrene Plant		
City: Carville	County/Parish: Iberville	State: Louisiana



Photo #:	DSCN0969.JPG
Date:	3/6/2023
Camera:	Nikon COOLPIX AW120
Photographer:	John Penland
Witness:	Elizabeth Pham, John Penland
Description: Label on non-hazardous waste labeled roll-off container of Aluminum Oxide located near Line 3	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 39

Location: TotalEnergies Petrochemicals & Refining USA Inc. – Carville Polystyrene Plant		
City: Carville	County/Parish: Iberville	State: Louisiana



Photo #:	DSCN0970.JPG
Date:	3/6/2023
Camera:	Nikon COOLPIX AW120
Photographer:	John Penland
Witness:	Elizabeth Pham, John Penland
Description: Non-hazardous waste labeled rolloff container of Aluminum Oxide located near Line 3	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 40

Location: TotalEnergies Petrochemicals & Refining USA Inc. – Carville Polystyrene Plant		
City: Carville	County/Parish: Iberville	State: Louisiana



Photo #:	DSCN0971.JPG
Date:	3/6/2023
Camera:	Nikon COOLPIX AW120
Photographer:	John Penland
Witness:	Elizabeth Pham, John Penland
Description: Point of generation for hazardous waste hydrocarbon contaminated filters in Line 3.	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 41

Location: TotalEnergies Petrochemicals & Refining USA Inc. – Carville Polystyrene Plant		
City: Carville	County/Parish: Iberville	State: Louisiana



Photo #:	DSCN0972.JPG
Date:	3/6/2023
Camera:	Nikon COOLPIX AW120
Photographer:	John Penland
Witness:	Elizabeth Pham, John Penland
Description: Point of generation for hazardous waste hydrocarbon contaminated filters in Line 3. Note: drips and spill present.	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 42

Location: TotalEnergies Petrochemicals & Refining USA Inc. – Carville Polystyrene Plant		
City: Carville	County/Parish: Iberville	State: Louisiana



Photo #:	DSCN0973.JPG
Date:	3/6/2023
Camera:	Nikon COOLPIX AW120
Photographer:	John Penland
Witness:	Elizabeth Pham, John Penland
Description: Hazardous waste labeled containers located in laboratory fume hood	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 43

Location: TotalEnergies Petrochemicals & Refining USA Inc. – Carville Polystyrene Plant		
City: Carville	County/Parish: Iberville	State: Louisiana



Photo #:	DSCN0974.JPG
Date:	3/6/2023
Camera:	Nikon COOLPIX AW120
Photographer:	John Penland
Witness:	Elizabeth Pham, John Penland
Description: Hazardous waste labeled containers located in laboratory fume hood	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 44

Location: TotalEnergies Petrochemicals & Refining USA Inc. – Carville Polystyrene Plant		
City: Carville	County/Parish: Iberville	State: Louisiana



Photo #:	DSCN0975.JPG
Date:	3/6/2023
Camera:	Nikon COOLPIX AW120
Photographer:	John Penland
Witness:	Elizabeth Pham, John Penland
Description: Erlenmeyer flask containing spent solvent generated from product testing.	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 45

Location: TotalEnergies Petrochemicals & Refining USA Inc. – Carville Polystyrene Plant		
City: Carville	County/Parish: Iberville	State: Louisiana



Photo #:	DSCN0976.JPG
Date:	3/6/2023
Camera:	Nikon COOLPIX AW120
Photographer:	John Penland
Witness:	Elizabeth Pham, John Penland
Description: Spent solvent container connected to laboratory equipment. Hose ports are ungasketed.	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 46

Location: TotalEnergies Petrochemicals & Refining USA Inc. – Carville Polystyrene Plant		
City: Carville	County/Parish: Iberville	State: Louisiana



Photo #:	DSCN0977.JPG
Date:	3/6/2023
Camera:	Nikon COOLPIX AW120
Photographer:	John Penland
Witness:	Elizabeth Pham, John Penland
Description: Hazardous waste labeled container located behind the laboratory in satellite accumulation area. Liquid lab waste	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 47

Location: TotalEnergies Petrochemicals & Refining USA Inc. – Carville Polystyrene Plant		
City: Carville	County/Parish: Iberville	State: Louisiana



Photo #:	DSCN0978.JPG
Date:	3/6/2023
Camera:	Nikon COOLPIX AW120
Photographer:	John Penland
Witness:	Elizabeth Pham, John Penland
Description: Hazardous waste label on container located behind the laboratory in satellite accumulation area	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 48

Location: TotalEnergies Petrochemicals & Refining USA Inc. – Carville Polystyrene Plant		
City: Carville	County/Parish: Iberville	State: Louisiana



Photo #:	DSCN0979.JPG
Date:	3/6/2023
Camera:	Nikon COOLPIX AW120
Photographer:	John Penland
Witness:	Elizabeth Pham, John Penland
Description: Screening system collecting scrap plastic in Line 5	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 49

Location: TotalEnergies Petrochemicals & Refining USA Inc. – Carville Polystyrene Plant		
City: Carville	County/Parish: Iberville	State: Louisiana



Photo #:	DSCN0980.JPG
Date:	3/6/2023
Camera:	Nikon COOLPIX AW120
Photographer:	John Penland
Witness:	Elizabeth Pham, John Penland
Description: Screening system collecting scrap plastic in Line 5	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 50

Location: TotalEnergies Petrochemicals & Refining USA Inc. – Carville Polystyrene Plant		
City: Carville	County/Parish: Iberville	State: Louisiana



Photo #:	DSCN0981.JPG
Date:	3/6/2023
Camera:	Nikon COOLPIX AW120
Photographer:	John Penland
Witness:	Elizabeth Pham, John Penland
Description: Belt skimmer located in Line 5. Collects free floating hydrocarbon from the inground sumps	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 51

Location: TotalEnergies Petrochemicals & Refining USA Inc. – Carville Polystyrene Plant		
City: Carville	County/Parish: Iberville	State: Louisiana



Photo #:	DSCN0982.JPG
Date:	3/6/2023
Camera:	Nikon COOLPIX AW120
Photographer:	John Penland
Witness:	Elizabeth Pham, John Penland
Description: Belt skimmer located in Line 5. Collects free floating hydrocarbon from the inground sumps	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 52

Location: TotalEnergies Petrochemicals & Refining USA Inc. – Carville Polystyrene Plant		
City: Carville	County/Parish: Iberville	State: Louisiana



Photo #:	DSCN0983.JPG
Date:	3/6/2023
Camera:	Nikon COOLPIX AW120
Photographer:	John Penland
Witness:	Elizabeth Pham, John Penland
Description: Belt skimmer located in Line 3. Collects free floating hydrocarbon from the inground waste water sumps	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 53

Location: TotalEnergies Petrochemicals & Refining USA Inc. – Carville Polystyrene Plant		
City: Carville	County/Parish: Iberville	State: Louisiana



Photo #:	DSCN0984.JPG
Date:	3/6/2023
Camera:	Nikon COOLPIX AW120
Photographer:	John Penland
Witness:	Elizabeth Pham, John Penland
Description: Belt skimmer located in Line 3. Collects free floating hydrocarbon from the inground wastewater sumps	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 54

Location: TotalEnergies Petrochemicals & Refining USA Inc. – Carville Polystyrene Plant		
City: Carville	County/Parish: Iberville	State: Louisiana



Photo #:	DSCN0985.JPG
Date:	3/6/2023
Camera:	Nikon COOLPIX AW120
Photographer:	John Penland
Witness:	Elizabeth Pham, John Penland
Description: Tank 19B used for the accumulation of offspec hydrocarbons for transfer to the neighboring styrene monomer plant for reprocessing.	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 55

Location: TotalEnergies Petrochemicals & Refining USA Inc. – Carville Polystyrene Plant		
City: Carville	County/Parish: Iberville	State: Louisiana



Photo #:	DSCN0986.JPG
Date:	3/6/2023
Camera:	Nikon COOLPIX AW120
Photographer:	John Penland
Witness:	Elizabeth Pham, John Penland
Description: Claimed satellite accumulation area for Line 3 with 5 x 55 gallon containers. 4 labeled as hazardous waste	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 56

Location: TotalEnergies Petrochemicals & Refining USA Inc. – Carville Polystyrene Plant		
City: Carville	County/Parish: Iberville	State: Louisiana



Photo #:	DSCN0987.JPG
Date:	3/6/2023
Camera:	Nikon COOLPIX AW120
Photographer:	John Penland
Witness:	Elizabeth Pham, John Penland
Description: Satellite accumulation area for maintenance shop with 1 x 55 gallon container labeled as hazardous waste. Waste aerosols	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 57

Location: TotalEnergies Petrochemicals & Refining USA Inc. – Carville Polystyrene Plant		
City: Carville	County/Parish: Iberville	State: Louisiana



Photo #:	DSCN0988.JPG
Date:	3/6/2023
Camera:	Nikon COOLPIX AW120
Photographer:	John Penland
Witness:	Elizabeth Pham, John Penland
Description: Label on hazardous waste labeled container located in Satellite accumulation area for maintenance shop. Waste aerosols.	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 58

Location: TotalEnergies Petrochemicals & Refining USA Inc. – Carville Polystyrene Plant		
City: Carville	County/Parish: Iberville	State: Louisiana



Photo #:	DSCN0989.JPG
Date:	3/6/2023
Camera:	Nikon COOLPIX AW120
Photographer:	John Penland
Witness:	Elizabeth Pham, John Penland
Description: Five-gallon container located near maintenance shop. Contains a small amount on unknown liquid.	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 59

Location: TotalEnergies Petrochemicals & Refining USA Inc. – Carville Polystyrene Plant		
City: Carville	County/Parish: Iberville	State: Louisiana



Photo #:	DSCN0990.JPG
Date:	3/6/2023
Camera:	Nikon COOLPIX AW120
Photographer:	John Penland
Witness:	Elizabeth Pham, John Penland
Description: Five-gallon container located near maintenance shop. Contains a small amount on unknown liquid.	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 60

Location: TotalEnergies Petrochemicals & Refining USA Inc. – Carville Polystyrene Plant		
City: Carville	County/Parish: Iberville	State: Louisiana



Photo #:	DSCN0991.JPG
Date:	3/6/2023
Camera:	Nikon COOLPIX AW120
Photographer:	John Penland
Witness:	Elizabeth Pham, John Penland
Description: Five-gallon container located near maintenance shop. Contains a small amount on unknown liquid.	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 61

Location: TotalEnergies Petrochemicals & Refining USA Inc. – Carville Polystyrene Plant		
City: Carville	County/Parish: Iberville	State: Louisiana



Photo #:	DSCN0992.JPG
Date:	3/6/2023
Camera:	Nikon COOLPIX AW120
Photographer:	John Penland
Witness:	Elizabeth Pham, John Penland
Description: Satellite Accumulation area for painting area. 1 x 55 gallon container labeled as Hazardous Waste. Spent Thinner	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 62

Location: TotalEnergies Petrochemicals & Refining USA Inc. – Carville Polystyrene Plant		
City: Carville	County/Parish: Iberville	State: Louisiana



Photo #:	DSCN0993.JPG
Date:	3/6/2023
Camera:	Nikon COOLPIX AW120
Photographer:	John Penland
Witness:	Elizabeth Pham, John Penland
Description: Satellite Accumulation area for painting area. 1 x 55 gallon container labeled as Hazardous Waste. Spent Thinner.	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 63

Location: TotalEnergies Petrochemicals & Refining USA Inc. – Carville Polystyrene Plant		
City: Carville	County/Parish: Iberville	State: Louisiana



Photo #:	DSCN0994.JPG
Date:	3/6/2023
Camera:	Nikon COOLPIX AW120
Photographer:	John Penland
Witness:	Elizabeth Pham, John Penland
Description: Hazardous Waste label on container located in the satellite accumulation area for the painting area. Spent Thinner.	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 64

Location: TotalEnergies Petrochemicals & Refining USA Inc. – Carville Polystyrene Plant		
City: Carville	County/Parish: Iberville	State: Louisiana



Photo #:	DSCN0995.JPG
Date:	3/6/2023
Camera:	Nikon COOLPIX AW120
Photographer:	John Penland
Witness:	Elizabeth Pham, John Penland
Description: Cans of waste paint being drained and consolidated in the painting area	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 65

Location: TotalEnergies Petrochemicals & Refining USA Inc. – Carville Polystyrene Plant		
City: Carville	County/Parish: Iberville	State: Louisiana



Photo #:	DSCN0996.JPG
Date:	3/6/2023
Camera:	Nikon COOLPIX AW120
Photographer:	John Penland
Witness:	Elizabeth Pham, John Penland
Description: Cans of waste paint being drained and consolidated in the painting area	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 66

Location: TotalEnergies Petrochemicals & Refining USA Inc. – Carville Polystyrene Plant		
City: Carville	County/Parish: Iberville	State: Louisiana



Photo #:	DSCN0997.JPG
Date:	3/6/2023
Camera:	Nikon COOLPIX AW120
Photographer:	John Penland
Witness:	Elizabeth Pham, John Penland
Description: Waste aerosol cans placed in unlabeled 5-gallon container in painting area	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 67

Location: TotalEnergies Petrochemicals & Refining USA Inc. – Carville Polystyrene Plant		
City: Carville	County/Parish: Iberville	State: Louisiana



Photo #:	DSCN0998.JPG
Date:	3/6/2023
Camera:	Nikon COOLPIX AW120
Photographer:	John Penland
Witness:	Elizabeth Pham, John Penland
Description: Container in painting area used for the accumulation of empty paint containers	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 68

Location: TotalEnergies Petrochemicals & Refining USA Inc. – Carville Polystyrene Plant		
City: Carville	County/Parish: Iberville	State: Louisiana



Photo #:	DSCN0999.JPG
Date:	3/6/2023
Camera:	Nikon COOLPIX AW120
Photographer:	John Penland
Witness:	Elizabeth Pham, John Penland
Description: Container in painting area used for the accumulation of empty paint containers	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 69

Location: TotalEnergies Petrochemicals & Refining USA Inc. – Carville Polystyrene Plant		
City: Carville	County/Parish: Iberville	State: Louisiana



Photo #:	DSCN1000.JPG
Date:	3/6/2023
Camera:	Nikon COOLPIX AW120
Photographer:	John Penland
Witness:	Elizabeth Pham, John Penland
Description: Shed in painting area	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 70

Location: TotalEnergies Petrochemicals & Refining USA Inc. – Carville Polystyrene Plant		
City: Carville	County/Parish: Iberville	State: Louisiana



Photo #:	DSCN1001.JPG
Date:	3/6/2023
Camera:	Nikon COOLPIX AW120
Photographer:	John Penland
Witness:	Elizabeth Pham, John Penland
Description: Unlabeled container of spent thinner inside shed in painting area	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 71

Location: TotalEnergies Petrochemicals & Refining USA Inc. – Carville Polystyrene Plant		
City: Carville	County/Parish: Iberville	State: Louisiana



Photo #:	DSCN1002.JPG
Date:	3/6/2023
Camera:	Nikon COOLPIX AW120
Photographer:	John Penland
Witness:	Elizabeth Pham, John Penland
Description: Unlabeled container of waste paint inside shed in painting area	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 72

Location: TotalEnergies Petrochemicals & Refining USA Inc. – Carville Polystyrene Plant		
City: Carville	County/Parish: Iberville	State: Louisiana



Photo #:	DSCN1003.JPG
Date:	3/6/2023
Camera:	Nikon COOLPIX AW120
Photographer:	John Penland
Witness:	Elizabeth Pham, John Penland
Description: Painting area	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 73

Location: TotalEnergies Petrochemicals & Refining USA Inc. – Carville Polystyrene Plant		
City: Carville	County/Parish: Iberville	State: Louisiana



Photo #:	DSCN1004.JPG
Date:	3/6/2023
Camera:	Nikon COOLPIX AW120
Photographer:	John Penland
Witness:	Elizabeth Pham, John Penland
Description: Pressure settings on pressure relief device on roof of Tank 19B	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 74

Location: TotalEnergies Petrochemicals & Refining USA Inc. – Carville Polystyrene Plant		
City: Carville	County/Parish: Iberville	State: Louisiana



Photo #:	DSCN1005.JPG
Date:	3/6/2023
Camera:	Nikon COOLPIX AW120
Photographer:	John Penland
Witness:	Elizabeth Pham, John Penland
Description: Pressure relief device on roof of Tank 19B	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 75

Location: TotalEnergies Petrochemicals & Refining USA Inc. – Carville Polystyrene Plant		
City: Carville	County/Parish: Iberville	State: Louisiana



Photo #:	DSCN1006.JPG
Date:	3/6/2023
Camera:	Nikon COOLPIX AW120
Photographer:	John Penland
Witness:	Elizabeth Pham, John Penland
Description: Pressure relief device on roof of Tank 19B	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 76

Location: TotalEnergies Petrochemicals & Refining USA Inc. – Carville Polystyrene Plant		
City: Carville	County/Parish: Iberville	State: Louisiana



Photo #:	DSCN1007.JPG
Date:	3/6/2023
Camera:	Nikon COOLPIX AW120
Photographer:	John Penland
Witness:	Elizabeth Pham, John Penland
Description: Pressure relief device on roof of Tank 19B	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 77

Location: TotalEnergies Petrochemicals & Refining USA Inc. – Carville Polystyrene Plant		
City: Carville	County/Parish: Iberville	State: Louisiana



Photo #:	DSCN1008.JPG
Date:	3/6/2023
Camera:	Nikon COOLPIX AW120
Photographer:	John Penland
Witness:	Elizabeth Pham, John Penland
Description: Pressure settings on pressure relief device on roof of Tank 19B	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 78

Location: TotalEnergies Petrochemicals & Refining USA Inc. – Carville Polystyrene Plant		
City: Carville	County/Parish: Iberville	State: Louisiana



Photo #:	DSCN1009.JPG
Date:	3/6/2023
Camera:	Nikon COOLPIX AW120
Photographer:	John Penland
Witness:	Elizabeth Pham, John Penland
Description: Pressure settings on pressure relief device on roof of Tank 19B	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 79

Location: TotalEnergies Petrochemicals & Refining USA Inc. – Carville Polystyrene Plant		
City: Carville	County/Parish: Iberville	State: Louisiana

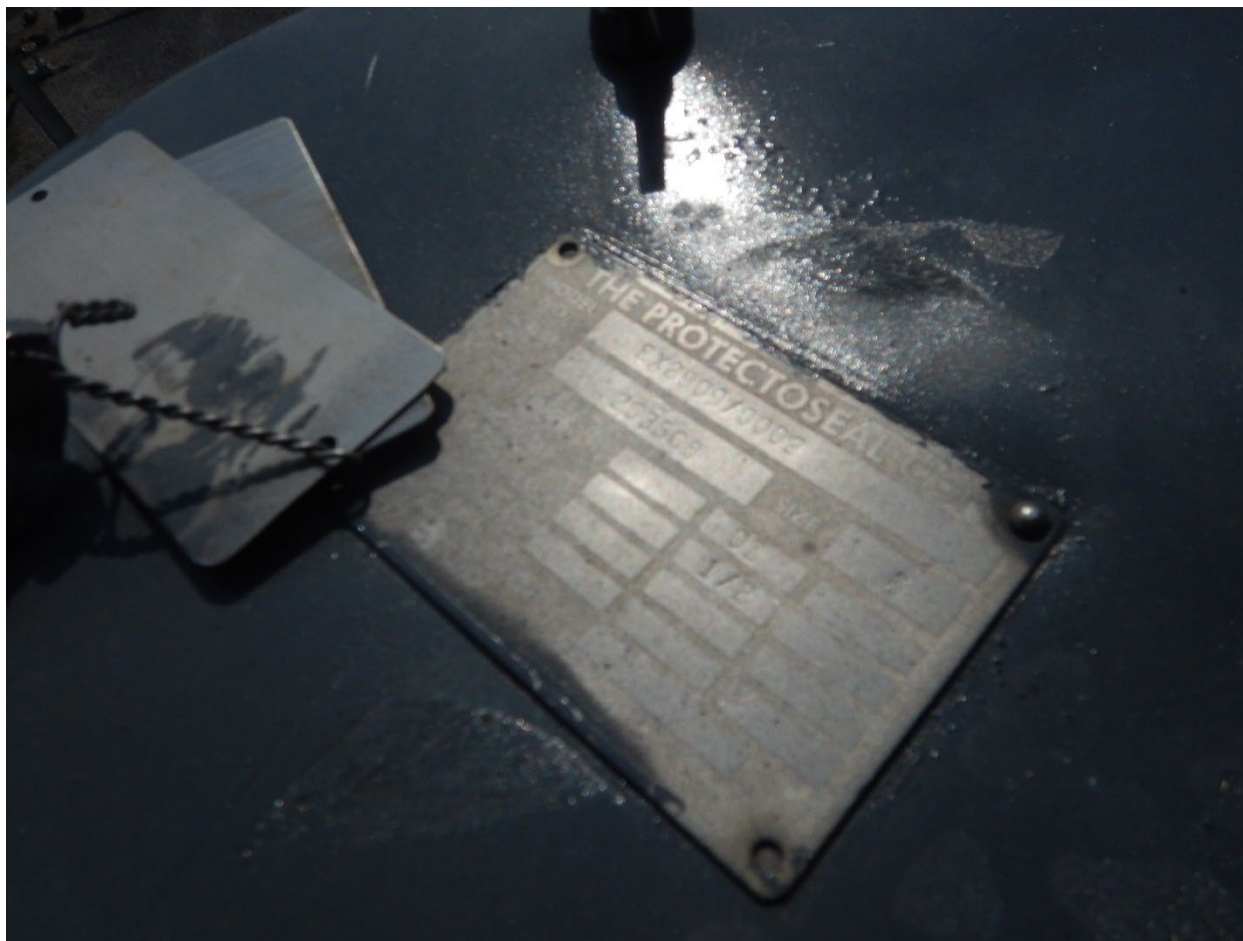


Photo #:	DSCN1010.JPG
Date:	3/6/2023
Camera:	Nikon COOLPIX AW120
Photographer:	John Penland
Witness:	Elizabeth Pham, John Penland
Description: Pressure settings on pressure relief device on roof of Tank 19B	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 80

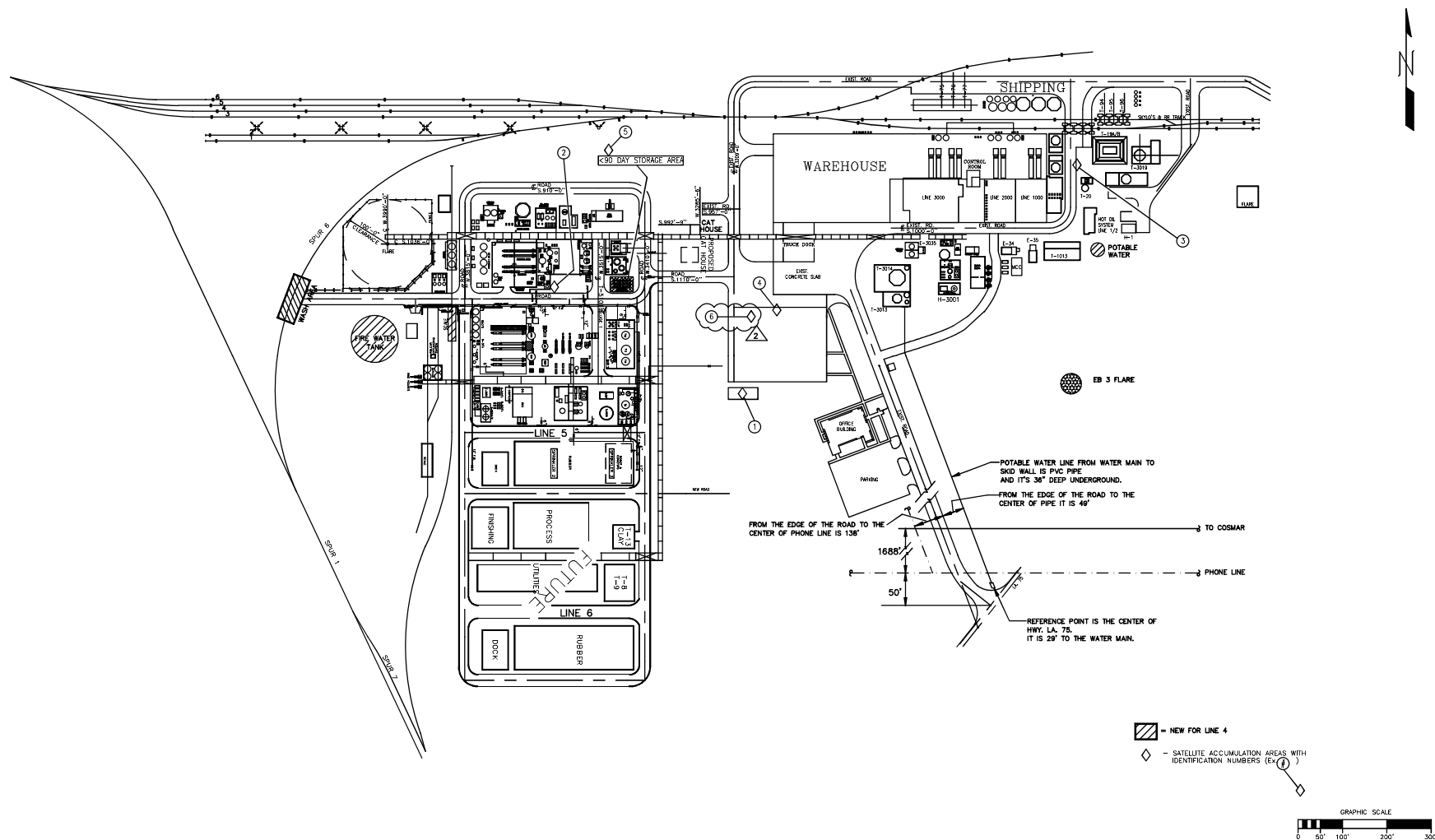
Location: TotalEnergies Petrochemicals & Refining USA Inc. – Carville Polystyrene Plant		
City: Carville	County/Parish: Iberville	State: Louisiana



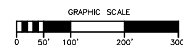
Photo #:	DSCN1011.JPG
Date:	3/6/2023
Camera:	Nikon COOLPIX AW120
Photographer:	John Penland
Witness:	Elizabeth Pham, John Penland
Description: Used oil tank located near Line 3	

Appendix 2

General Facility Map



NEW FOR LINE 4
 SATELLITE ACCUMULATION AREAS WITH IDENTIFICATION NUMBERS (E.g.)



2	05/31/16	CMB	AS FOUND RPM 05/274/16	RPM	RPM
1	01/12/11	JFP	AS FND JL-001	CMD	JL
REV	DATE	BY	DESCRIPTION	CHK'D	APP'D



CARVILLE STYRENES COMPLEX
 CARVILLE, LOUISIANA

LO (OFFSITES) <90 DAY STORAGE & SATELLITE ACCUMULATION AREAS ENVIRONMENTAL

ENGR: RK
DRAWN: LKD
CHK'D: BF
APP'D: BF
DATE: 08/25/05
SCALE: 1"=100'-0"

PRIOR DWG #: NONE

LO-H-02-002

REV

2

Appendix 3

Opening and Closing Conference Sign-In Sheet

Opening Conference Sign-In Sheet:

NAME	TITLE	REPRESENTING	PHONE	EMAIL
Elizabeth Pham	Lead Inspector	EPA R6	214-665-8354	Pham.elizabeth@epa.gov
John Penland	Inspector	EPA R6	214-665-9717	Penland.john@epa.gov
Casey Crow	HSE Manager	TotalEnergies	225-642-4759	Casey.crow@totalenergies.com
Jill Lamberth	Env. Group Leader	TotalEnergies	225-642-4772	Jill.lamberth@totalenergies.com
Jimbo Earles	Inspector	LDEQ	318-487-5657	Jimbo.earles@la.gov
Karen Price	Sr. Env. Scientist	LDEQ	225-219-3612	Karen.price2@la.gov
Terry Dedon	Staff Scientist	LDEQ	225-219-3331	Terry.dedon@la.gov
Dewayne Logan	Env. Scientist III	LDEQ	225-219-3031	Dewayne.logan@la.gov

Closing Conference Sign-In Sheet:

NAME	TITLE	REPRESENTING	PHONE	EMAIL
Elizabeth Pham	Lead Inspector	EPA R6	214-665-8354	Pham.elizabeth@epa.gov
John Penland	Inspector	EPA R6	214-665-9717	Penland.john@epa.gov
Terry Dedon	Staff Scientist	LDEQ	225-219-3331	Terry.dedon@la.gov
Casey Crow	HSE Manager	TotalEnergies	225-642-4759	Casey.crow@totalenergies.com
Jill Lamberth	Env. Group Leader	TotalEnergies	225-642-4772	Jill.lamberth@totalenergies.com
Stella Pulman	HSE Attorney	TotalEnergies	713-483-5364	Stella.pulman@totalenergies.com
Ashley Rabalais	Operations Manager	TotalEnergies	225-642-4576	Ashley.rabalais@totalenergies.com
Renaud Dernoncourt	Site Manager	TotalEnergies	225-642-4572	Renaud.dernoncourt@totalenergies.com
Paul Martin	Eng. Manager	TotalEnergies	225-642-4533	Paul.martin@totalenergies.com
Natika Anderson	Tech Manager	TotalEnergies	275-642-4701	Natika.anderson@totalenergies.com
Jared Fontenot	Mnt. Manager	TotalEnergies	225-642-4640	Jared.fontenot@totalenergies.com

Appendix 4

EPA Daily Summary E-mails

From: [Pham, Elizabeth](#)
To: [Casey CROW](#); [Jill LAMBERTH](#); [Jimbo Earles](#); [Karen Price \(DEQ\)](#); [Terry Dedon](#); [dewayne.logan@la.gov](#); [Ashley RABALAIS](#); [Stella PULMAN](#); [Renaud DERNONCOURT](#)
Cc: [Yurk, Jeffrey](#); [Penland, John](#)
Subject: Daily Summary for FY2023 RCRA CEI - TotalEnergies - Carville, LA (LAD980875603) - March 6, 2023
Date: Wednesday, March 15, 2023 7:13:00 AM
Attachments: [image001.png](#)

Edits to bullet point 8 of the Daily Summary was made on March 15, 2023.

All,

Here is a summary of my notes from today's inspection. If there are any errors or omissions please let me know.

Introduction

During the week of March 6, 2023, I, Elizabeth Pham, will be conducting an unannounced inspection of the TotalEnergies Petrochemicals & Refining USA Inc. - Polystyrene Plant facility (TotalEnergies) located at, 6225 HWY 75, Carville, LA 70721 for compliance with the Resource Conservation and Recovery Act (RCRA). I will be assisted on this inspection by Environmental Protection Agency (EPA) inspector John Penland and Louisiana Department for Environmental Quality (LDEQ) investigators Jimbo Earles, Karen Price, Terry Dedon, and Dewayne Logan. The inspection will include walkthroughs of the facility's hazardous waste generation and management units and a review of the facility records related to hazardous waste management.

Inspection Attendees:

NAME	TITLE	REPRESENTING	PHONE	EMAIL
Elizabeth Pham	Lead Inspector	EPA R6	214-665-8354	Pham.elizabeth@epa.gov
John Penland	Inspector	EPA R6	214-665-9717	Penland.john@epa.gov
Casey Crow	HSE Manager	TotalEnergies		Casey.crow@totalenergies.com
Jill Lamberth	Env. Group Leader	TotalEnergies	225-642-4772	Jill.lamberth@totalenergies.com
Jimbo Earles	Inspector	LDEQ	318-487-5657	Jimbo.earles@la.gov
Karen Price	Sr. Env. Scientist	LDEQ	225-219-3612	Karen.price2@la.gov
Terry Dedon	Staff Scientist	LDEQ	225-219-3331	Terry.dedon@la.gov
Dewayne Logan	Env. Scientist III	LDEQ	225-219-3031	Dewayne.logan@la.gov
Greg Johnson	Env. Engineer	TotalEnergies		
Ashley Rabalais	Operations Manager	Total Energies	225-642-4576	Ashley.rabalais@totalenergies.com

Daily Summary

- Initial Entry to the facility - approximately 0930 hrs
- Opening meeting start – 0945 hrs
 - I presented my credentials to Mr. Casey Crow and Ms. Jill Lamberth and informed them that we were there to conduct an inspection of the facility under the authority of section 3007 of the Resource Conservation and Recovery Act
 - We discussed the authority for the inspection – RCRA Section 3007 - For purposes of developing or assisting in the development of any regulation or enforcing the provisions of this chapter, any person who generates, stores, treats, transports, disposes of, or otherwise handles or has handled hazardous wastes shall, upon request of any officer, employee or representative of the Environmental Protection Agency, duly designated by the Administrator, or upon request of any duly designated officer, employee or representative of a State having an authorized hazardous waste program, furnish information relating to such wastes and permit such person at all reasonable times to have access to, and to copy all records relating to such wastes. For the purposes of developing or assisting in the development of any regulation or enforcing the provisions of this chapter, such officers, employees or representatives are authorized—
 - (1) to enter at reasonable times any establishment or other place where hazardous wastes are or have been generated, stored, treated, disposed of, or transported from;
 - (2) to inspect and obtain samples from any person of any such wastes and samples of any containers or labeling for such wastes.
 - We discussed the purpose of EPA's inspection – Assessment of TotalEnergies' compliance with its requirements under RCRA, including, but not limited to, the requirements for: waste determination and counting; waste marking; waste container management; use of the hazardous waste manifest; emergency planning; personnel training; air pollution control requirements for hazardous waste units; and the requirements for the management of excluded or exempt materials.
 - Discussed the right of TotalEnergies to assert a Confidential Business Information claim for records requested by EPA (see attachment)
 - Discussed the process for transferring electronic records – EPA has set up a Microsoft OneDrive folder with access limited to the inspection participants and other designated TotalEnergies employees
 - One Drive Link: [FY23 Total Carville RCRA CEI](#)
 - Discussed the inspection process – the inspection will be conducted March 6 through March 10, 2023 during normal business hours. The participants will meet at the facility at 9:00am each day to conduct the onsite portion of the inspection and discuss the findings of the ongoing records review. The records review will be conducted by the inspectors independently offsite throughout the week. Daily summaries will be provided by the inspectors at the end of each day to ensure a clear communication of questions and findings. The meeting Friday, March 10, 2023 will be reserved for a closing conference, where EPA will summarize the overall findings of the inspection to that point and provide a plan for concluding any unfinished evaluation.

- Presented the initial request for compliance records, including:
 - Hazardous waste notification form: 8700-12
 - A current Hazardous Waste Contingency Plan
 - Facility SOPs related to the generation or management of hazardous waste
 - RCRA related training records for selected personnel
 - Facility Maps
 - Facility process diagram(s)
 - Facility Waste Profiles
 - Land Disposal Restriction notifications
 - Any Hazardous Waste Manifests not previously uploaded to e-manifest
 - Any contract or agreement between the facility and any reclamation company related to hazardous secondary materials
 - Active RCRA permit(s)
- Meeting concluded with a safety briefing at approximately 1015 hrs.
- Facility Walkthrough
 - Beginning at approximately 1030 hrs.
 - Central Accumulation Area
 - All containers initially appear to be in good condition and closed
 - Containers are stored outdoors under a roof out of direct sunlight
 - Identified one green tote labeled as R-5100 PRU Materials about half-way full
 - A waste determination was requested
 - Identified two 55-G drums labeled as Line 3000 Heat Transfer Oil Possible SEB Contamination 6-12-22
 - A waste determination was requested
 - Questions of legitimate reuse
 - Identified six 55-G drums in back corner behind blue Heat Transfer Oil drums
 - A waste determination was requested
 - Worn out labels, unreadable. Not marked with labels that identify the contents.
 - Satellite Accumulation Area
 - Five 55-G drums of hazardous waste and one 55-G drum of non-hazardous waste identified in facility's SAA
 - Containers are stored outdoors in direct sunlight next to the CAA
 - Drum #23-063 H.C. Filter had Pig lid that was bent with no gasket so therefore incapable of closing or containing the waste
 - SAA is defined under 40 CFR 262.15
 - "A generator may accumulate as much as 55 gallons of non-acute hazardous waste and/or either one quart of liquid...in containers at or near any point of generation where wastes initially accumulate which is under the control of the operator of the process generating the waste..."
 - On first impression, the facility's SAA does not meet this definition.
 - See Federal Register 49569 where EPA first promulgated rules and defined SAAs
 - Unit 3, 4, 5

A walkthrough of Units 3, 4, 5 identified points of generation for the Hydrocarbon Contaminated Filters

- Materials during the filter changeouts had spill beneath the filter canisters in Unit 5 and not been removed
 - Steam Out Area
 - The unit is used for cleaning containers and process equipment and was extensively stained at the time of inspection. According to Ms. Lamberth, these residues are D001 hazardous waste
 - Hazardous waste has been accumulating on the ground inside and Shawn (last name not provided) states that waste is not contained at the time of generation and the unit is periodically cleaned with a power washer
 - The unit is surrounded by unsecured tarp on 3 sides which allowed material to be released from the unit during power wash
 - An SOP was requested
 - The tarp is in poor condition and the waste is visible on nearby walls and process equipment
 - Identified one red roll-off box unlabeled near CAA full of material
 - Ms. Lamberth believes the contents inside is aluminum oxide
 - A waste determination was requested
 - Identified holes in the tarp
 - Identified one red roll-off box labeled Aluminum Oxide near Polystyrene Unit 1
 - Maintained in good condition
- Daily Wrap up meeting at approximately 1600 hrs.
 - Departed Facility at approximately 1615 hrs.

Planned activities for March 7, 2023

- Revisit Polystyrene Plant that includes Polymer Recovery Unit (PRU), laboratory, filter belt
- Begin review of waste determination and waste characterization

Elizabeth Pham

Enforcement and Compliance Assurance Division

U.S. EPA Region 6

Office: (214) 665-8354

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From: [Pham, Elizabeth](#)
To: ["casey.crow@totalenergies.com"](#); ["jill.lamberth@totalenergies.com"](#); Jimbo Earles; "Karen Price (DEQ)"; Terry Dedon; ["dewayne.logan@la.gov"](#); ["ashley.rabalais@totalenergies.com"](#); [renaud.dernoncourt@totalenergies.com](#)
Cc: [Penland, John](#); [Yurk, Jeffrey](#)
Subject: Daily Summary for FY2023 RCRA CEI - TotalEnergies - Carville, LA (LAD980875603) - March 7, 2023
Date: Tuesday, March 7, 2023 9:40:00 PM

All,

Here is a summary of my notes from today's inspection. If there are any errors or omissions please let me know.

Inspection Attendees:

NAME	TITLE	REPRESENTING	PHONE	EMAIL
Elizabeth Pham	Lead Inspector	EPA R6	214-665-8354	Pham.elizabeth@epa.gov
John Penland	Inspector	EPA R6	214-665-9717	Penland.john@epa.gov
Casey Crow	HSE Manager	TotalEnergies		Casey.crow@totalenergies.com
Jill Lamberth	Env. Group Leader	TotalEnergies	225-642-4772	Jill.lamberth@totalenergies.com
Jimbo Earles	Inspector	LDEQ	318-487-5657	Jimbo.earles@la.gov
Karen Price	Sr. Env. Scientist	LDEQ	225-219-3612	Karen.price2@la.gov
Terry Dedon	Staff Scientist	LDEQ	225-219-3331	Terry.dedon@la.gov
Dewayne Logan	Env. Scientist III	LDEQ	225-219-3031	Dewayne.logan@la.gov
Greg Johnson	Env. Engineer	TotalEnergies		
Ashley Rabalais	Operations Manager	TotalEnergies	225-642-4576	Ashley.rabalais@totalenergies.com
Renaud Dernoncourt	Site Manager	TotalEnergies	225-642-4572	Renaud.dernoncourt@totalenergies.com

Daily Summary:

- Inspection Start – approximately 0930 hrs.
- Corrective Actions
 - Identified one green tote labeled as R-5100 PRU Materials about half-way full
 - Facility determined that the contents inside this tote did not come from PRU but was from the clean-out of the flare system (V-5100)
 - This tote will be removed from the CAA and sold as scrap
 - Identified two 55-G drums labeled as Line 3000 Heat Transfer Oil Possible SEB Contamination 6-12-22
 - Facility has taken a sample and determined that the material is reusable
 - Mr. Crow will go over documentation supporting this determination on 3/8/23
 - Identified six 55-G drums in back corner behind blue Heat Transfer Oil drums with worn out labels that were unreadable
 - New labels have been put on and identified the contents determining it was non-waste
 - Facility will upload photos in 'Corrective Actions Taken' folder in the OneDrive
 - Drum #23-063 H.C. Filter had Pig lid that was bent with no gasket so therefore incapable of closing or containing the waste
 - The old red Pig lids have been replaced by a normal drum lid with a lock ring and facility will order new black Pig lids moving forward
 - Facility will upload photos in 'Corrective Actions Taken' folder in the OneDrive
 - Identified one red roll-off box unlabeled near CAA full of material
 - Facility has confirmed the contents inside is aluminum oxide with ethylbenzene and provided Waste Profile
 - Facility will upload this profile in 'Waste Determination Records' folder in the OneDrive
- Facility Walkthrough
 - Began at approximately 1000 hrs.
 - Laboratory
 - On first impression, laboratory was clean and organized with labels
 - Identified two satellite accumulation containers in the laboratory fume hood correctly labeled and closed
 - Identified waste solvent collected in Erlenmeyer flask that was unlabeled and open with a funnel on top and unlabeled
 - Ms. Lamberth states that the flask was emptied in the morning and the contents found during time of inspection was still in use
 - Identified container containing MEK waste that was not closed and unlabeled
 - RO14703
 - Laboratory – Outdoor
 - Identified drum with closed funnel on top in the outdoor storage area of the lab
 - Facility calls it a SAA for the laboratory but this does not appear to meet the definition at 40 CFR 262.15 and may be subject to the <90 day container storage standard
 - Line 5

We observed oil residues present in the unit from removal of filters from the filter canisters

- Spill was not promptly cleaned up and may be considered abandoned as defined by 40 CFR 261.2(a)(2)(i)(A)
 - RO12748
 - We observed oil residues present from the skimmer in the unit
 - Spill was not promptly cleaned up and may be considered abandoned as defined by 40 CFR 261.2(a)(2)(i)(A)
- Line 3
 - We observed oil residues present from the skimmer in the unit
 - Spill was not promptly cleaned up and may be considered abandoned as defined by 40 CFR 261.2(a)(2)(i)(A)
- Wastewater
 - Wastewater is collected in in-ground sumps and piped to neighboring styrene manufacturing plant for treatment in their Clean Water Act permitted WWTU
 - The on-site generated wastewater is managed in a contiguous tank system without intermediate storage in land-based units and appears to meet the definition of Wastewater Treatment Unit (260.10)
 - The in-ground tank system in each of the process lines has a belt skimmer that collects hydrocarbons from the wastewater. These hydrocarbon sludges are mixed with sludges from the vacuum system and byproducts from the monomer recovery process. This is combined into Tank 19-B for dewatering prior to being piped to the purification unit at the neighboring styrene plant for reclamation.
- Polymer Recovery Unit (PRU)
 - On first impression, the unit itself is in good condition
 - The unit is used to melt and consolidate scrap polystyrene for sale
- Loading racks at railroad
 - On first impression, the area itself is in good condition
 - However, an SAA was identified between this area and Unit 1
 - Similar to the declared between lines 4 and 5, this area does not appear to meet the definition for a SAA at 40 CFR 262.15 and may be subject to the <90 day container storage standard
 - Mr. Crow states that the lids have been replaced by a normal drum lid with a lock ring and facility will order new black Pig lids moving forward
- Document Review
 - Initial review of Contingency Plan and identified elements of ERP needed for review
 - Initial review of Weekly Inspection Records
 - Initial review of the Oily Wastewater Process diagrams
 - Initial review of Training Records
 - Initial review of the facility waste profiles
 - Waste profiles do not include documentation of the average VO content of the waste (see 40 CFR 264.1084) or other applicability determination for 40 CFR 265 Subpart CC.
 - The waste profile for waste aerosol cans does not include the hazardous waste

characteristic of reactivity. These cans are not punctured or drained of propellant.

- The waste profile for hydrocarbon filters indicates that the waste does not contain free liquids, however free liquids were observed within the container used for the accumulation of this waste stream.

- Daily Wrap up meeting at approximately 1545 hrs.
- Departed Facility at approximately 1600 hrs.

Planned activities for March 8, 2023

- Walkthrough of maintenance shop, electrical shop, universal waste areas, paint/blast yard
- Additional on-site review of RCRA related documents

Elizabeth Pham

Enforcement and Compliance Assurance Division

U.S. EPA Region 6

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To: casey.crow@totalenergies.com; jill.lamberth@totalenergies.com; [Jimbo Earles](#); [Karen Price \(DEQ\)](#); [Terry Dedon](#); dewayne.logan@la.gov; ashley.rabalais@totalenergies.com; renaud.dernoncourt@totalenergies.com
Cc: [Penland, John](#); [Yurk, Jeffrey](#)
Subject: Daily Summary for FY2023 RCRA CEI - TotalEnergies - Carville, LA (LAD980875603) - March 8, 2023
Date: Wednesday, March 8, 2023 9:25:00 PM

All,

Here is a summary of my notes from today's inspection. If there are any errors or omissions please let me know.

Inspection Attendees:

NAME	TITLE	REPRESENTING	PHONE	EMAIL
Elizabeth Pham	Lead Inspector	EPA R6	214-665-8354	Pham.elizabeth@epa.gov
John Penland	Inspector	EPA R6	214-665-9717	Penland.john@epa.gov
Casey Crow	HSE Manager	TotalEnergies		Casey.crow@totalenergies.com
Jill Lamberth	Env. Group Leader	TotalEnergies	225-642-4772	Jill.lamberth@totalenergies.com
Jimbo Earles	Inspector	LDEQ	318-487-5657	Jimbo.earles@la.gov
Karen Price	Sr. Env. Scientist	LDEQ	225-219-3612	Karen.price2@la.gov
Terry Dedon	Staff Scientist	LDEQ	225-219-3331	Terry.dedon@la.gov
Dewayne Logan	Env. Scientist III	LDEQ	225-219-3031	Dewayne.logan@la.gov
Greg Johnson	Env. Engineer	TotalEnergies		
Ashley Rabalais	Operations Manager	TotalEnergies	225-642-4576	Ashley.rabalais@totalenergies.com
Renaud Dernoncourt	Site Manager	TotalEnergies	225-642-4572	Renaud.dernoncourt@totalenergies.com

Daily Summary:

- Inspection Start – approximately 0930 hrs.
- Corrective Actions
 - Mr. Crow provided documentation supporting the contents in the drums labeled 'Line 3000 Heat Transfer Oil Possible SEB Contamination 6-12-22' is reusable.
- Facility Walkthrough
 - Began at approximately 1000 hrs.
 - Maintenance Shop
 - Identified one 55-G drum containing waste aerosol cans maintained in good condition, closed, and labeled.
 - No concerns were identified at this time.
 - Next to maintenance shop, a 5-G bucket was identified with small amount of oily water that facility declared non-hazardous.
 - The bucket was immediately taken to dispose the contents.
 - Paint/Blast Yard
 - Identified one 55-G drum containing spent paint thinner closed and labeled
 - Identified one 55-G drum containing scrap metal closed and labeled
 - A shed was identified in the area and inside, we observed 5 paint cans being dried out. The facility explains the process of drying out the cans includes disposing the paint into the spent paint thinner drum and then letting the contents drip into other cans until dried out then disposing the dried out can in the scrap metal drum and repeating this process.
 - Residues *remaining in* RCRA empty containers are exempt from regulation as a hazardous waste
 - Residues removed from containers are subject to regulation
 - Evaporation of solvents from waste is treatment.
 - Identified an open bucket containing aerosol cans that was opened and unlabeled.
 - Identified two 5-gal buckets containing spent solvent that was opened and unlabeled.
 - We observed blast media all over the ground in this area.
 - A profile was requested and it was determined the blast media was non-hazardous. However, this area demonstrates a solid waste management unit.
 - Electrical Shop
 - Identified boxes of fluorescent bulbs that was labeled. No concerns were identified at this time.
 - Tank T-19B
 - Spill residues were identified within the secondary containment. At this time, further discussion is needed to determine if contents contain solid waste.
 - An analytical was requested for the contents in the tank.
 - Used Oil Tank
 - No concerns were identified at this time.
 - SAA

EPA has provided some guidance about Satellite Accumulation Areas in the Generator Improvement Rule.

- For more information:
 - <https://www.epa.gov/hwgenerators/frequent-questions-about-hazardous-waste-generation#08>
 - <https://www.federalregister.gov/documents/2016/11/28/2016-27429/hazardous-waste-generator-improvements-rule#p-480>
 - <https://rcrapublic.epa.gov/files/14703.pdf>
- Document Review
 - LDR Forms
 - UHC's are not identified for characteristic waste. Further review is needed.
 - Weekly Inspection Records
 - No concerns were found at this time
 - Waste Profiles
 - Still waiting on previous concerns listed in Daily Summary March 7, 2023.
 - Blast Media Profile and Analysis
 - Determined that the blast media is non-hazardous
 - Training Records
 - Facility has received identified personnel from manifests and weekly inspection reports. More names will be provided based on review of ERP.
 - ERP
 - The 'HSSE-SITE-SAFE-ERP-001, Incident Command System' referenced in the Contingency Plan does not list the required emergency personnel
 - Contingency Plan
 - Quick Reference Guide is not attached to the Contingency Plan
- On-going Document Request
 - Form 8700-12 – received in OneDrive
 - Contingency Plan – received in OneDrive
 - ERP elements – received in OneDrive
 - SOP's – received in OneDrive
 - Training Records – received hard copies but needs to be uploaded in OneDrive, Training Matrix received in OneDrive
 - Facility Map – received in OneDrive
 - Facility Process Diagrams – reviewed on-site, needs to be uploaded in OneDrive
 - Waste Profiles – reviewed on-site, needs to be uploaded in OneDrive
 - LDR's – reviewed on-site, needs to be uploaded in OneDrive
 - Weekly Inspection Records – reviewed on-site, needs to be uploaded in OneDrive
- Daily Wrap up meeting at approximately 1530 hrs.
- Departed Facility at approximately 1545 hrs.

Planned activities for March 9, 2023

- Discussion of inputs and outputs of production process

Discussion of definition of solid waste pertaining to the styrene returning to the monomer plant

- Discussion of definitions and standards for SAA
- Review of Contingency Plan standards with facility
- Timeline of delivery for requested records
- Potential Inspection Closing Conference meeting

Elizabeth Pham

Enforcement and Compliance Assurance Division

U.S. EPA Region 6

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From: [Pham, Elizabeth](#)
To: casey.crow@totalenergies.com; jill.lamberth@totalenergies.com; [Jimbo Earles](#); [Karen Price \(DEQ\)](#); [Terry Dedon](mailto:Terry.Dedon@dewayne.logan.la.gov); dewayne.logan@la.gov; ashley.rabalais@totalenergies.com; renaud.dernoncourt@totalenergies.com; [Stella PULMAN](#)
Cc: [Penland, John](#); [Yurk, Jeffrey](#)
Subject: Daily Summary for FY2023 RCRA CEI - TotalEnergies - Carville, LA (LAD980875603) - March 9, 2023
Date: Friday, March 10, 2023 8:11:00 AM

All,

Here is a summary of my notes from today's out-briefing meeting. If there are any errors or omissions please let me know.

Introduction

During the week of March 6, 2023, I, Elizabeth Pham, conducted an unannounced inspection of the TotalEnergies Petrochemicals & Refining USA Inc. - Polystyrene Plant facility (TotalEnergies) located at 6225 HWY 75, Carville, LA for compliance with the Resource Conservation and Recovery Act (RCRA). I was assisted on this inspection by Environmental Protection Agency (EPA) inspector John Penland and Louisiana Department for Environmental Quality (LDEQ) investigators Jimbo Earles, Karen Price, Terry Dedon, and Dewayne Logan. The inspection included walkthroughs of the facility's hazardous waste generation and management units and a review of the facility records related to hazardous waste management.

Purpose

The TotalEnergies facility was targeted for inspection as part of the National Compliance Initiative for Air Emissions in Hazardous Waste Management Units and hazardous waste facilities located in or near Environmental Justice communities.

Close-out Meeting Attendees:

NAME	TITLE	REPRESENTING	PHONE	EMAIL
Elizabeth Pham	Lead Inspector	EPA R6	214-665-8354	Pham.elizabeth@epa.gov
John Penland	Inspector	EPA R6	214-665-9717	Penland.john@epa.gov
Terry Dedon	Staff Scientist	LDEQ	225-219-3331	Terry.dedon@la.gov
Casey Crow	HSE Manager	TotalEnergies	225-642-4759	Casey.crow@totalenergies.com
Jill Lamberth	Env. Group Leader	TotalEnergies	225-642-4772	Jill.lamberth@totalenergies.com
Stella Pulman	HSE Attorney	TotalEnergies	713-483-	Stella.pulman@totalenergies.com

			5364	
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Daily Summary:

- Inspection Start – approximately 0930 hrs.
- Discussion with facility about production process, solid waste definition, standards for Satellite Accumulation Area, and standards for Contingency Plan
- Close-out meeting – approximately 1545 hrs.
- Departed Facility – approximately 1630 hrs.

Identified Concerns

1. Unlabeled drums in Central Accumulation Area (CAA)
 - The unlabeled drums were determined to be non-waste stored in the CAA.
2. One opened drum in the Satellite Accumulation Area (SAA) near the CAA due to bent lid with no gasket
 - Facility replaced lid with normal drum lid with lock ring and is in the process of ordering new Pig lid.
3. The drums in the SAA near the CAA does not appear to meet the definition of SAA
 - Concerns that drums are not near or at the point of generation under the control of the operator.
 - Concerns that total amount of waste in the drums in this SAA contain more than 55-G of hazardous waste.
 - However, these drums seem to meet the <90 day storage area requirements with the exception of an accumulation start date.
4. The drums in the SAA in between railroads and Unit 1 does not appear to meet the definition of SAA
 - Concerns that drums are not near or at the point of generation under the control of the operator.
 - Concerns that total amount of waste in the drums in this SAA contain more than 55-G of hazardous waste.
 - However, these drums seem to meet the <90 day storage area requirements with the

exception of an accumulation start date.

5. Hazardous waste spill from the hydrocarbon contaminated filters present in Unit 5
 - Spill was not promptly cleaned up and may be considered abandoned as defined by 40 CFR 261.2(a)(2)(i)(A)
6. Spills of sludge removed from the wastewater sump present in Unit 5 at the skimmer belt
 - Spill was not promptly cleaned up and may be considered abandoned as defined by 40 CFR 261.2(a)(2)(i)(A)
7. Spills of sludge removed from the wastewater sump present in Unit 3 at the skimmer belt
 - Spill was not promptly cleaned up and may be considered abandoned as defined by 40 CFR 261.2(a)(2)(i)(A)
8. Spills of sludge present in the secondary containment for Tank 19-B
 - Spill was not promptly cleaned up and may be considered abandoned as defined by 40 CFR 261.2(a)(2)(i)(A)
 - Facility represented it may be sludge from wastewater sump back-up
9. Accumulation of hazardous waste D001 on the ground inside Steam Out Area. Drag-out and overspray of D001 is visible on nearby walls and process equipment
 - Hazardous waste is generated and not contained
10. Unlabeled roll-off box identified near CAA
 - Facility determined it contained aluminum oxide that filters styrene.
 - On-going review of waste determination
 - Waste profile reviewed on-site indicates free liquids in the waste and flash point determination is requested.
 - <https://www.federalregister.gov/d/2020-12695/p-117>
11. Container containing MEK waste was opened and unlabeled during time of inspection in the laboratory
 - Concerns that the container did not meet the SAA standards
12. The drum located in the outdoor storage area of the lab does not appear to meet the definition of SAA
 - Concerns that drums are not under the control of the operator.
13. Concerns that waste in Tank 19-B may qualify as spent material or a solvent listing of F003
 - Concerns would effect tanks 19-B, 3012, 4012, and 5012
 - Facility must demonstrate it meets the compliance requirements of 40 CFR 261.4(a)(23) if the facility chooses to manage the material as a hazardous secondary material or manage this waste as hazardous based on definition of solid waste of 40 CFR 261.2(c)(3)
14. Concerns of process of drying out paint cans identified in paint shed
 - Residues *remaining in* RCRA empty containers are exempt from regulation as a hazardous waste
 - Residues removed from containers are subject to regulation
 - Evaporation of solvents from waste is treatment.
15. Bucket containing waste aerosol cans was opened and unlabeled in the paint shed
16. Two 5-gal buckets containing spent solvent was opened and unlabeled in the paint shed
17. Concerns of blast media discarded in paint blasting area
 - Facility is in the process of closing the area and may need to close as a solid waste management unit

18. Contingency Plan has not been able to document the distribution to local emergency response authorities
19. Emergency coordinators are not listed in Contingency Plan
20. Subpart CC determinations are not documented based 40 CFR 265.1084(a)
21. Incomplete characterization of aerosol cans in waste profiles
 - Unpunctured aerosol cans demonstrates the waste characteristic of reactivity (D003)
22. Underlying Hazardous Constituents (UHC's) are not documented in Land Disposal Restriction (LDR) Forms

On-going document request for compliance records:

- Form 8700-12 – received
- Contingency Plan and Quick Reference Guide – received, record of distribution is requested
- ERP – received
- SOP's – SOP's for waste generating processes such as filter changes, painting/blasting, steam-out is requested
- Training Records – electronic list is requested, Training Matrix received
- Facility Map – received
- Process Diagrams – Non-CBI process diagram is requested
- Waste Profiles – electronic version is requested
- LDR – received
- General Facility Description – received

All documents must be received in shared OneDrive by COB **Friday, March 31, 2023**.

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