

INSPECTION REPORT

Inspection Entry Date/Time	04/11/2024 12:30 (CT) Virtual Opening Conference 04/15/2024 08:30 (CT)		Announced: No (tenants and related facilities)	
Inspection Exit Date/Time	04/17/2024 1:54 (CT) 04/23/2024 01:00 (CT) Virtual Closing Conference		Access: Granted	
Regulatory Program	RCRA			
Type of Inspection	Focused Compliance Inspection (FCI)			
Company Name	Port of Lake Charles and Related Port Facilities			
Facility or Site Name	Port of Lake Charles			
Facility/Site Identifier	LAD002545291			
Facility/Site Physical Address	1611 W Sallier St			
City, State, Zip Code	Lake Charles, LA 70601			
County/Borough	Calcasieu Parish			
Generator Status	Very Small Quantity Generator (VSQG)			
NAICS	488310			
Type of Operation	POLC provides infrastructure (i.e. berths, warehouse) for their clients and tenants to dock ships and store material.			
Geographic Coordinates	30.2130127, -93.2462135			
Mailing Address / Secondary Address	PO Box 3753			
City, State, Zip Code	Lake Charles, LA 70602			
Permit Number (If Applicable)	Not Applicable			
Additional Persons Participating in Inspection:				
Name	Title	Organization	Email	Phone
Elizabeth Pham	Inspector	EPA REGION 6	Pham.elizabeth@epa.gov	(214) 665-8354
Sandesh Thapa	Inspector	EPA REGION 6	Thapa.sandesh@epa.gov	(214) 665-2265
Anshul Paripati	Contractor	Eastern Research Group (ERG)	Anshul.Paripati@erg.com	(571) 535-1503
Lead Inspector:				
Cameron Tanaka				07/24/2024
	ERG	Cameron.Tanaka@erg.com	(703) 633-1632 ext. 11632	

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

Type of inspection: Focused Compliance Inspection (FCI)

The Port of Lake Charles (POLC) and surrounding facilities were selected for inspection based on an Environmental Justice and Regional initiative to evaluate facilities at ports receiving or transporting Resource Conservation and Recovery Act (RCRA)-regulated hazardous wastes, and/or have an International Convention for the Prevention of Pollution from Ships (MARPOL) Annex V Certificate of Adequacy (COA) issued by the U.S. Coast Guard (USCG).

This report is based on information supplied by the facility representatives, inspector observations, port related facilities, and records including photographs taken (see Appendix 1), verbal or written statements made during or after the on-site inspection, and/or materials shown, demonstrated, or submitted to the EPA during or after the on-site inspection. In addition, information gathered prior to or after the inspection from a review of EPA, State, and public records may be included in this report.

Attendees

Title/Organization	Name	Phone	Email	Opening Conf.	Closing Conf.
Lead Inspector/ Contractor/ERG	Cameron Tanaka	(703) 633-1632 ext. 11632	Cameron.Tanaka@erg.com	Yes	No
RCRA Inspector/ Contractor/ERG	Anshul Paripati	(571) 535-1503	Anshul.Paripati@erg.com	Yes	Yes
Inspector/Enforcement Officer/EPA Region 6	Elizabeth Pham	(214) 665-8354	Pham.elizabeth@epa.gov	Yes	Yes
Inspector/Enforcement Officer/EPA Region 6	Sandesh Thapa	(214) 665-2265	Thapa.sandesh@epa.gov	Yes	Yes
Unknown	Richert Self	Unknown	rlself@portlc.com	Yes	No
Director of Operations	Todd Henderson	(337) 493-3520	thenderson@portlc.com	Yes	Yes
Assistant Director of Navigation and Environmental Affairs	Regan Brown	(337) 493-3540	rbrown@portlc.com	Yes	Yes

Opening Conference

The inspections at Port of Lake Charles tenants and surrounding facilities were selected for inspection based on an Environmental Justice and Regional initiative to evaluate facilities at ports receiving or transporting Resource Conservation and Recovery Act (RCRA)-regulated hazardous wastes. ERG contractors Cameron Tanaka (Lead) and Anshul Paripati along with EPA Region 6 inspectors Elizabeth Pham and Sandesh Thapa conducted the inspections during the week of 04/15/2023. The Port of Lake Charles provides infrastructure such as berths or warehouse space for their clients and tenants to dock ships and store material. The Port of Lake Charles uses one MARPOL Annex I & V COA that applies to all of the port's facilities and their tenants' facilities, and waste removal from ships is typically coordinated by ship agents and contracted out to third parties.

Facility/Site Information

Number of employees	Varies by tenant or related facility.
Length of Facility at this Location	Port of Lake Charles has been operating since 1926.
Operating Hours	24 hours, seven days per week at docks.
Safety Training Provided to Inspector(s)?	No, not required.
Size of Facility	Varies by tenant or related facility.
What type of generator facility notified?	The facility itself is a VSQG but other port facilities have separate generator IDs.
What type of generator facility verified?	Generator status not verified as this was a focused inspection to evaluate facilities at ports receiving or transporting RCRA regulated hazardous wastes.

Process Description

POLC, officially known as the Lake Charles Harbor & Terminal District, is a deepwater seaport located on the Calcasieu Ship Channel and is the nation's 10th -busiest port district based on tonnage. The specific area that the inspection team covered was City Docks, which is located 34 miles inland from the Gulf of Mexico. The port provides infrastructure such as berths and warehouse spaces for transportation and storage of materials including lumber, cement, rubber, sulfur mixed with rubber, and steel. City Docks is a 200-acre facility that contains 13 berths and over 1.6 million square feet of storage space. During the duration of the inspection, the inspection team focused on visiting Port of Lake Charles tenants and surrounding facilities associated with dock operations.

Tenant(s) – In order of inspection time.

Tenant/Area	Inspection Date	Process Description	Area of Concern
Port of Lake Charles	04/15/24	POLC provides infrastructure (i.e. berths, warehouse) for their clients and tenants to dock ships and store material. These materials include lumber, cement, rubber, and steel, and do not include hazardous waste. They have one hazardous waste stream from removing residual material from aerosol cans. They have a MARPOL Annex I and V COA that covers all of their locations and tenants' locations on their City Docks property. Their docks are occasionally used to remove slops from ships, but these are never stored on their property.	Yes
Logistec Terminals	04/15/24	Logistec Terminals (Logistec) unloads materials including lumber and rice from vessels. They do not load or unload any hazardous waste or waste in general. They mostly generate waste such as dunnage and general trash, used oil, used oil filters, and bilge water in their mechanic shop. They do not have their own MARPOL COA, as it is handled by the POLC.	Yes
ACE Marine	04/17/24	ACE Marine (ACE) delivers supplies, such as food and engine parts, to ships in the harbor. They operate a 60-foot barge and tugboat with a crane on it and two small vessels that they load with the supplies for delivery to the ships. They offload regulated garbage and returned engine parts (handled as scrap metal). These materials are picked up by trucks directly from the ship and taken off-site immediately. They do not have their own MARPOL certificate, as it is handled by the POLC.	No

SECTION II – OBSERVATIONS – In order of inspection time.

Tenant: Port of Lake Charles			
Section: 2.1	Date: 04/15/24, 8:35 AM	Contains AOC: Yes	Contains CBI: No
Lead Inspector: Cameron Tanaka	Attendees: Todd Henderson (Director of Operations) and Tim Atkins (Captain of Harbor Police Department)		
The POLC provides infrastructure including berths and warehouse space for their clients, tenants, and stevedores to dock ships and store material. Their berths, warehouses, and docking space are located on City Docks. POLC stores materials including lumber, cement, rubber, sulfur mixed with rubber, and steel. They do not allow for storage of any hazardous waste and any waste received at the docks is taken directly off site by Environmental Response Services, Inc on trucks. They are a VSQG (EPA ID LAD002545291) and a small quantity handler of universal waste. They have one hazardous waste stream from removing residual materials from aerosol cans. To the best of their knowledge, they have never shipped off a full container of this material. Their maintenance shop stores used oil and used antifreeze. These are pumped out by third party transporters using vacuum trucks. POLC has a MARPOL Annex I and V COA from the USCG. POLC personnel stated that their docks receive slops and oily bilge water from ships, but these are transferred off site by vacuum truck without any storage on site. In these cases, the ship’s agents will contact a transporter to pick up the waste. After the opening conference, the inspection team performed a visual inspection of the maintenance shop where used oil, used antifreeze, and their hazardous waste drum for residual material from aerosol cans. The inspection team met up with Rob McGilry who indicated that they contact a vacuum truck about once a month to pump out the used oil from its designated tank. The used oil tank is contained within a berm (see Appendix 1 – Photo 1) and there were two full 5-gallon buckets in the berm next to the tank that contained used oil according to Mr. McGilry (see Appendix 1 – Photo 2). The used oil tank and the 5-gallon buckets containing used oil were not labeled “Used Oil” at the time of the inspection. [AOC #1 – POLC did not clearly label their containers and aboveground tank used to store used oil with the words “Used Oil” - 40 CFR 279.22(c)(1)]. After explaining this observation, Mr. McGilry labeled the containers with “Used Oil” on a piece of paper (see Appendix 1 – Photo 6). In a follow-up response from POLC, Regan Brown explained that “With respect to the used oil buckets, we placed all used oil in our large used oil container and instructed personnel not to accumulate smaller containers of used oil, unless necessary” (see Appendix 2). Personnel were also instructed that any used oil containers need to be properly labeled. Their used antifreeze is also taken off site with a vacuum truck. The inspection team also viewed the facility’s pad for managing aerosol cans (see Appendix 1 – Photo 3). The 55-gallon black drum is for emptied aerosol cans for metal recycling and the blue drum is for collecting residual materials from the punctured aerosol cans. According to POLC personnel, the blue drum has never been filled. There were no issues the inspection team noted on the label of the hazardous waste drum for residual materials from the punctured aerosol cans (see Appendix 1 – Photo 4). The inspection team noted that there was product material stored next to the hazardous waste material on their waste pad (see Appendix 1 – Photo 5). In a follow-up response from POLC, Regan Brown explained that “we moved the product(s) out of the secondary containment area and welded a chain across that area to segregate the waste” (see Appendix 2). A photo of this change is included as Appendix 3. The inspection team also observed the facility’s used antifreeze container and noted no issues. The inspection team did not observe any other AOCs at the time of the inspection. A closing conference was conducted at approximately 9:35 AM with POLC personnel and the inspection team departed at 9:45 AM.			

Tenant: Logistec Terminals			
Section: 2.2	Date: 04/15/24, 10:00 AM	Contains AOC: Yes	Contains CBI: No
Lead Inspector: Cameron Tanaka	Attendees: Jeffery Swan (Terminal Superintendent)		
Logistec is located on City Docks, which is owned by POLC. Logistec unloads materials including lumber and rice from vessels. They do not load or unload any hazardous waste or waste in general. They primarily generate waste such as dunnage and general trash, which are disposed of in the port’s dumpsters. They also generate used oil, used oil filters, and oily water in their mechanic shop. Their used oil is generated through maintenance on their forklifts and the oily water is generated from their mechanics power washing their forklifts. These materials are held in plastic totes and are all taken off-site by a third-party transporter. According to Mr. Swan, their used oil, bilge water, and used oil filter containers are filled up then shipped off about once per year. They also generate used batteries which are sent back to the battery manufacturer. Logistec does not have a MARPOL COA from the USCG as the POLC holds the COA that covers the whole port. They also do not have an EPA ID number. During the inspection, the inspection team visually inspected Logistec’s maintenance warehouse where used oil and other wastes are stored. The inspection team viewed Logistec’s used oil filter drum (see Appendix 1 – Photo 7). The inspection team also viewed the facility’s used oil and bilge water totes (see Appendix 1 – Photo 8). The inspection team viewed one of their used oil filter containers without secondary containment (see Appendix 1 – Photo 9). In a follow-up email from Mr. Swan (see Appendix 4), a photo was provided showing that secondary containment was added to this used oil filter drum (see Appendix 5 – Photo 1). The inspection team noted that their used batteries were not dated and labeled as “bad” rather than as “used batteries” (see Appendix 1 – Photos 10 and 11) [AOC #2 – Logistec did not label or mark clearly their used batteries with any one of the following phrases: "Universal Waste-Battery(ies)," or "Waste Battery(ies)," or "Used Battery(ies)." - 40 CFR 273.14(a); AOC #3 – Logistec did not provide a demonstration of the length of time that the universal waste has been accumulated from the date it becomes a waste or is received - 40 CFR 273.15(c)]. Logistec personnel immediately added labels to their batteries (see Appendix 1 – Photo 12). In a follow-up email from Mr. Swan (see Appendix 4), a photo was provided showing that these labels and dates were added to all of these batteries (see Appendix 5– Photo 2). The inspection team did not observe any other AOCs at the time of the inspection. A closing conference was conducted at approximately 11:00 AM with Mr. Swan. The inspection team departed at 11:10 AM.			

Tenant: ACE Marine			
Section: 2.3	Date: 04/17/24, 1:10 PM	Contains AOC: No	Contains CBI: No
Lead Inspector: Cameron Tanaka	Attendees: Richard Cory Parker (Operations Manager)		
ACE Marine is a launching company that delivers and loads supplies to ships in the harbor. ACE is a tenant of the POLC. They operate a 60-foot barge, a tugboat equipped with a crane, and two skiffs. They deliver food, engine parts, and other supplies to ships. They also offload APHIS regulated garbage and scrapped engine parts. Occasionally used batteries come with the regulated garbage. ACE hires third-party transporters, such as Nature Group, Texana Waste Services, Cameron LNG, and Marine Waste, to remove wastes directly from their ships when the ships arrive at the dock. They never store any of this waste on site. They also moor ships. ACE generates used oil from their ship and stores it on site in containers for a maximum of two months. ERS' vacuum trucks pump used oil out of these containers when the containers are full. When their batteries are			

used up, they immediately exchange them with their battery supplier. ERS also pumps the bilge waste out of their vessels. Mr. Parker explained that to his knowledge ACE Marine does not have a MARPOL COA or an EPA ID number.

No apparent AOCs were observed by the inspection team during the time of the inspection. A closing conference was conducted at approximately 1:45 PM with Mr. Parker.

SECTION III – RECORDS REVIEW

No RCRA regulated records reviewed during this focused onsite inspection.

SECTION IV – APPARENT AREAS OF CONCERN

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

Tenant: Port of Lake Charles		
AOC #1 – POLC did not clearly label containers used to store used oil with the words “Used Oil.”	Citation: 40 CFR 279.22(c)(1)	Section: 2.1
Tenant: Logistec Terminals		
AOC #2 – Logistec did not label or mark clearly their used batteries with any one of the following phrases: "Universal Waste-Battery(ies)," or "Waste Battery(ies)," or "Used Battery(ies)."	Citation: 40 CFR 273.14(a)	Section: 2.2
AOC #3 – Logistec did not provide a demonstration of the length of time that the universal waste has been accumulated from the date it becomes a waste or is received.	Citation: 40 CFR 273.15(c)	Section 2.2

SECTION V – CLOSING CONFERENCE AND FOLLOW UP**Closing Conference**

The on-site inspection was completed on 04/19/2024 and the closing conference was held by conference call on 04/23/2024 at 1:00 PM CST. During the closing conference, the inspection team informed the Port of Lake Charles personnel that areas of concern and requests for documents for each facility were communicated at the conclusion of each respective inspection.

Follow-Up

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

Communication Log

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

1. 05/03/24 POLC email – Regan Brown sent a photograph and two descriptions of corrective actions implemented at the site.
2. 05/28/24 Logistec email – Jeffery Swan sent an email with photographs of corrective actions implemented at the site.

SECTION VI – LIST OF APPENDICES

Appendix 1. Photograph Log

Appendix 2. Follow-Up Email from Port of Lake Charles

Appendix 3. Photo of Secondary Containment Area from Follow-Up Email from Port of Lake Charles

Appendix 4. Follow-Up Email from Logistec Terminals

Appendix 5. Follow-Up Photographs from Logistec Terminals

APPENDIX 1.
PHOTOGRAPH LOG



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 1

Location: Port of Lake Charles		
City: Lake Charles	County/Parish: Calcasieu	State: Louisiana



Photo File Name: DSCN7161

Date of Photo: 04/15/2024

Time of Photo: 09:35 hrs.

Photographer: Anshul Paripati

Description: View of used oil tank with berm in the POLC maintenance shop.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 2

Location: Port of Lake Charles		
City: Lake Charles	County/Parish: Calcasieu	State: Louisiana



Photo File Name: DSCN7162

Date of Photo: 04/15/2024

Time of Photo: 09:37 hrs.

Photographer: Anshul Paripati

Description: Unlabeled 5-gallon buckets containing used oil in the POLC maintenance shop.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 3

Location: Port of Lake Charles		
City: Lake Charles	County/Parish: Calcasieu	State: Louisiana



Photo File Name: DSCN7163

Date of Photo: 04/15/2024

Time of Photo: 09:38 hrs.

Photographer: Anshul Paripati

Description: View of hazardous waste drum pad in the POLC maintenance shop storing a 55-gallon drum of residual material from punctured aerosol cans.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 4

Location: Port of Lake Charles		
City: Lake Charles	County/Parish: Calcasieu	State: Louisiana



Photo File Name: DSCN70164

Date of Photo: 04/15/2024

Time of Photo: 09:39 hrs.

Photographer: Anshul Paripati

Description: View of the hazardous waste drum label in the POLC maintenance shop.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 5

Location: Port of Lake Charles		
City: Lake Charles	County/Parish: Calcasieu	State: Louisiana



Photo File Name: DSCN7165

Date of Photo: 04/15/2024

Time of Photo: 09:44 hrs.

Photographer: Anshul Paripati

Description: Overview of drum pad with the 55-gallon hazardous waste drum and product drum in the POLC maintenance shop.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 6

Location: Port of Lake Charles		
City: Lake Charles	County/Parish: Calcasieu	State: Louisiana



Photo File Name: DSCN7166

Date of Photo: 04/15/2024

Time of Photo: 09:46 hrs.

Photographer: Anshul Paripati

Description: Labeled used oil containers in POLC maintenance shop.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 7

Location: Logistec Terminals		
City: Lake Charles	County/Parish: Calcasieu	State: Louisiana



Photo File Name: DSCN7167

Date of Photo: 04/15/2024

Time of Photo: 10:34 hrs.

Photographer: Anshul Paripati

Description: View of Logistec's used oil filter drum in their maintenance shop.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 8

Location: Logistec Terminals		
City: Lake Charles	County/Parish: Calcasieu	State: Louisiana



Photo File Name: DSCN7168

Date of Photo: 04/15/2024

Time of Photo: 10:35 hrs.

Photographer: Anshul Paripati

Description: View of Logistec's used oil and oily water totes in their maintenance shop.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 9

Location: Logistec Terminals		
City: Lake Charles	County/Parish: Calcasieu	State: Louisiana



Photo File Name: DSCN7169

Date of Photo: 04/15/2024

Time of Photo: 10:36 hrs.

Photographer: Anshul Paripati

Description: View of Logistec's used oil filter drum in their maintenance shop.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 10

Location: Logistec Terminals		
City: Lake Charles	County/Parish: Calcasieu	State: Louisiana

Photo File Name: DSCN7170



Date of Photo: 04/15/2024

Time of Photo: 10:43 hrs.

Photographer: Anshul Paripati

Description: View of Logistec's used batteries labeled as "bad" in their maintenance shop.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 11

Location: Logistec Terminals		
City: Lake Charles	County/Parish: Calcasieu	State: Louisiana



Photo File Name: DSCN7171

Date of Photo: 04/15/2024

Time of Photo: 10:47 hrs.

Photographer: Anshul Paripati

Description: Another view of Logistec's used batteries labeled "bad" in their maintenance shop.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 12

Location: Logistec Terminals		
City: Lake Charles	County/Parish: Calcasieu	State: Louisiana



Photo File Name: DSCN7172

Date of Photo: 04/15/2024

Time of Photo: 10:54 hrs.

Photographer: Anshul Paripati

Description: View of Logistec's used batteries with added dates in their maintenance shop.

APPENDIX 2.
FOLLOW-UP EMAIL FROM PORT OF LAKE CHARLES

City Docks-EPA inspection

Regan Brown <rbrown@portlc.com>

Fri 2024-05-03 8:59 AM

To: Cameron Tanaka <Cameron.Tanaka@erg.com>; Pham, Elizabeth <Pham.Elizabeth@epa.gov>

Cc: Todd Henderson <thenderson@portlc.com>; Nick Pestello <npestello@portlc.com>; Richert L. Self <rlself@portlc.com>; Robert Guillory <rguillory@portlc.com>

 1 attachments (1 MB)

sec cont. area.jpg;

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

Good morning Cameron & Elizabeth,

I wanted to follow up on the two observations that were made during the EPA's recent inspection. Regarding the product material being next to a hazardous waste drum, we moved the product(s) out of the secondary containment area and welded a chain across that area to segregate the waste. Please see attached photograph.

With respect to the used oil buckets, we placed all used oil in our large used oil container and instructed personnel not to accumulate smaller containers of used oil, unless necessary. Personnel were also instructed that any used oil containers need to be properly labeled. Please let me know if you have any questions. Thanks.

R. Regan Brown

Lake Charles Harbor & Terminal District

Assistant Director of Navigation and Environmental Affairs

(337) 493-3540 Office

(337) 842-7765 Cell

APPENDIX 3.

PHOTO OF SECONDARY CONTAINMENT AREA FROM FOLLOW-UP EMAIL FROM PORT OF LAKE CHARLES



APPENDIX 4.
FOLLOW-UP EMAIL FROM LOGISTEC TERMINALS

RE: Follow-Up from EPA Inspection 4/15 (Logistec Terminals)

Jeffery Swan <jswan@logistec.com>

Tue 2024-05-28 5:18 PM

To: Cameron Tanaka <Cameron.Tanaka@erg.com>; Britton Miller <bmillier@logistec.com>; Joseph Thornton <jthornton@logistec.com>; Rodger Ballard <rballard@logistec.com>; Edward Frampton <eframpton@logistec.com>; opslc@logistec.com <opslc@logistec.com>
Cc: Anshul Paripati <Anshul.Paripati@erg.com>; Joe Watson <Joe.Watson@erg.com>; Pham, Elizabeth <Pham.Elizabeth@epa.gov>; Ramrakha, Jayshika <Ramrakha.Jayshika@epa.gov>; Pandak, Debra (she/her/hers) <Pandak.Debra@epa.gov>; Thapa, Sandesh <Thapa.Sandesh@epa.gov>

📎 2 attachments (285 KB)

EPA 1.jpg; EPA 2.jpg;

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

Cam,

I apologize for not sending the pictures sooner I was thinking I did send them. If you need anything else please let me know.

Respectfully.

Jeffery Swan

Terminal Superintendent

T 337.433.3362

M 337.693.8679

Logistec Terminals Inc.

150 Marine St., Building 200, Suite C

Lake Charles, LA 70601

www.logistec.com

PROUD TO BE RECOGNIZED AS

LOGISTEC



From: Cameron Tanaka <Cameron.Tanaka@erg.com>

Sent: Tuesday, May 28, 2024 3:39 PM

To: Jeffery Swan <jswan@logistec.com>; Britton Miller <bmillier@logistec.com>; Joseph Thornton <jthornton@logistec.com>; Rodger Ballard <rballard@logistec.com>; Edward Frampton <eframpton@logistec.com>; opslc@logistec.com

Cc: Anshul Paripati <Anshul.Paripati@erg.com>; Joe Watson <Joe.Watson@erg.com>; Pham, Elizabeth <Pham.Elizabeth@epa.gov>; Ramrakha, Jayshika <Ramrakha.Jayshika@epa.gov>; Pandak, Debra (she/her/hers) <Pandak.Debra@epa.gov>; Thapa, Sandesh <Thapa.Sandesh@epa.gov>

Subject: Re: Follow-Up from EPA Inspection 4/15 (Logistec Terminals)

Some people who received this message don't often get email from cameron.tanaka@erg.com. [Learn why this is important](#)

External Email: Use caution when opening links and attachments / **Courriel externe:** Soyez prudent avec les liens et documents joints

Hi Jeffery,

Just wanted to check in on this and see if you all had a chance to take pictures of these items.

Best,
Cam

From: Jeffery Swan <jswan@logistec.com>
Sent: Tuesday, April 16, 2024 7:54 AM
To: Cameron Tanaka <Cameron.Tanaka@erg.com>; Britton Miller <bmiller@logistec.com>; Joseph Thornton <jthornton@logistec.com>; Rodger Ballard <rballard@logistec.com>; Edward Frampton <eframpton@logistec.com>; opslc@logistec.com <opslc@logistec.com>
Cc: Anshul Paripati <Anshul.Paripati@erg.com>; Joe Watson <Joe.Watson@erg.com>; Pham, Elizabeth <Pham.Elizabeth@epa.gov>; Ramrakha, Jayshika <Ramrakha.Jayshika@epa.gov>; Pandak, Debra (she/her/hers) <Pandak.Debra@epa.gov>; Thapa, Sandesh <Thapa.Sandesh@epa.gov>
Subject: RE: Follow-Up from EPA Inspection 4/15 (Logistec Terminals)

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

Good morning Cameron,
We will be getting the secondary containment this week for the used oil filter drum as we discussed yesterday on your visit. As for the used dead batteries we will change the wording as per the regulations. When both items are corrected, I will send pictures of both items to you so you can document that we Logistec Terminals LC has complied with the EPA regulations.

Respectfully,
Jeffery Swan
Terminal Superintendent
T 337.433.3362
M 337.693.8679

Logistec Terminals Inc.
150 Marine St., Building 200, Suite C
Lake Charles, LA 70601
www.logistec.com
PROUD TO BE RECOGNIZED AS



From: Cameron Tanaka <Cameron.Tanaka@erg.com>
Sent: Monday, April 15, 2024 11:08 PM
To: Jeffery Swan <jswan@logistec.com>
Cc: Anshul Paripati <Anshul.Paripati@erg.com>; Joe Watson <Joe.Watson@erg.com>; Pham, Elizabeth <Pham.Elizabeth@epa.gov>; Ramrakha, Jayshika <Ramrakha.Jayshika@epa.gov>; Pandak, Debra (she/her/hers) <Pandak.Debra@epa.gov>; Thapa, Sandesh <Thapa.Sandesh@epa.gov>
Subject: Follow-Up from EPA Inspection 4/15 (Logistec Terminals)

You don't often get email from cameron.tanaka@erg.com. [Learn why this is important](#)

Hi Jeffery,

I am following up with a list of items and notes from our inspection today. We had the following observations. If you have any responses, clarification or documentation of corrective actions, we ask that you provide those to us as soon as possible, and we will incorporate those into the report (ideally within two weeks to be included in the report).

- I mentioned that your used oil filter drum needed secondary containment, but this appears to only be for transfer facilities. You all do not need to add secondary containment from what I understand, but this would be a best practice.
- Used batteries were not correctly labelled and dated. This one seems to apply to you. We have documentation that you added the dates on them. However, they were labelled as "Bad" and looking into the regulations they have to be labelled as "Universal Waste-Battery(ies)," "Waste Battery(ies)," or "Used Battery(ies)."

Again, thank you for taking the time out of your day to meet with us. Please let us know if you have any questions or concerns. Any follow-up can be sent to myself, and the persons attached.

Thanks,
Cam

Cameron Tanaka (he/him)

Eastern Research Group, Inc.

cameron.tanaka@erg.com

Cell: (508) 314-6432

APPENDIX 5.
FOLLOW-UP PHOTOGRAPHS FROM LOGISTEC TERMINALS



