

INSPECTION REPORT

Inspection Entry Date/Time	07/18/2024 14:10 (CT)			Announced: No (tenants and related facilities)
Inspection Exit Date/Time	07/18/2024 15:30 (CT)			Access: Granted
Regulatory Program	RCRA			
Type of Inspection	Focused Compliance Inspection (FCI)			
Facility or Site Name	Gulf Gateway Terminal LLC			
Facility/Site Identifier	N/A			
Facility/Site Physical Address	7500 Terminal Rd			
City, State, Zip Code	New Orleans, LA 70126			
County/Borough	Orleans Parish			
Generator Status	N/A			
NAICS	424480			
Type of Operation	Gulf Gateway Terminal stores renewable diesel fuels for customers and ships them out via rail.			
Geographic Coordinates	30.0012, -89.9938			
Additional Persons Participating in Inspection:				
Name	Title	Organization	Email	Phone
Dedriel Gardner	Inspector	EPA REGION 6	Gardner.Dedriel@epa.gov	(281) 983-2133
Joe Watson	Contractor	Eastern Research Group (ERG)	Joe.Watson@erg.com	(215) 891-6615
Lead Inspector:				
Vince Damiano				
	ERG	Vince.Damiano@erg.com	(703) 835-6281	

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

The Port of New Orleans 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, 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	Vince Damiano	(703) 835-6281	Vince.Damiano@erg.com	Yes	Yes
RCRA Inspector/ Contractor/ERG	Joe Watson	(215) 891-6615	Joe.Watson@erg.com	Yes	Yes
Inspector/Enforcement Officer/EPA Region 6	Dedriel Gardner	(281) 983-2133	Gardner.Dedriel@epa.gov	Yes	Yes

Facility General Description

Tenant/Area	Inspection Date	Process Description	Area of Concern
Gulf Gateway Terminal LLC	07/18/24	Gulf Gateway Terminal (GGT) operates as a terminal and storage facility for renewable diesel fuels. The fuel arrives in barges and is offloaded into the GGT 115,000-barrel tank. From the storage tank, the fuels are hard piped to loading arms at the GGT rail stop and loaded into rail cars to be delivered to customers across the country. GGT operates under the Port of New Orleans' MARPOL COA.	No

SECTION II – OBSERVATIONS

Tenant: Gulf Gateway Terminal LLC			
Section: 2.1	Date: 07/18/24, 02:10 PM	Contains AOC: No	Contains CBI: No
Lead Inspector: Vince Damiano	Attendees: Brent Robertson (Manager) and Michael Wasgespack (Environmental Consultant)		
GGT is a tenant of the Port of New Orleans and operates as a terminal and storage facility for renewable diesel fuels. The fuel arrives in barges and is offloaded into the GGT 115,000-barrel tank. From the storage tank, the fuels are hard piped to loading arms at the GGT rail stop and loaded into rail cars to be delivered to customers across the country. GGT operates under the Port of New Orleans’ MARPOL COA. GGT does not maintain an EPA ID as they do not generate or handle any regulated wastes. Mr. Robertson explained since GGT switched to handling only renewable diesel products made from soybean oil around 2021, the site only generates non-hazardous waste. Mr. Robertson informed the inspection team that GGT’s storage tank was damaged in 2020 and all diesel products inside the tank had to be moved to barges for the tank to be repaired. When asked if any hazardous waste was generated from the tank repairs, Mr. Robertson said all waste was non-hazardous as the material the tank was holding at the time was sweet crude oil. Mr. Robertson said almost all the crude oil was able to be saved as product with the remainder of the waste generated from the incident was determined to be non-hazardous oil contaminated solids such as absorbents and soil. GGT had no storage areas. The inspection team did observe GGT’s dock space from a distance as there was thunderstorms during the inspection and found no areas of concern (AOCs); however, further EPA review may change or add to their potential AOCs. A closing conference was conducted at approximately 3:30 PM with GGT personnel.			

SECTION III – RECORDS REVIEW

No RCRA-regulated records were reviewed during this focused onsite inspection.

SECTION IV – AREAS OF CONCERN

Not Applicable

SECTION V – FOLLOW UP

No follow-up requested.