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Hazardous Waste Enforcement: U.S. Environmental Protection Agency and Golden Meadow, Louisiana Port Service Facility Enter into Consent Agreement

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The United States Environmental Protection Agency ("EPA") and HOS Port, LLC ("HOS") entered into an October 9th Consent Agreement and Final Order ("CAFO") addressing alleged violations of the Resource Conservation and Recovery Act ("RCRA") hazardous waste regulations. See Docket No. RCRA-06-2024-1004.

The CAFO provides that HOS operates a port in Golden Meadow, Louisiana, providing dockage and support services to offshore supply vessels and multi-purpose service vessels that operate in offshore oilfield and non-oilfield markets ("Facility").

EPA is stated to have conducted a RCRA record review of the HOS Facility during the period from January 31, 2024 to August 20, 2024. The review included an assessment of the Facility's activities as a generator of hazardous waste including a review of the information voluntarily provided to EPA by HOS.

EPA conducted a RCRA onsite inspection on February 6th.

The inspection is stated to have determined that the Facility, at a minimum, generated and offered for transport and treatment hazardous waste having the characteristic of ignitability (D001).

The inspection is stated to have determined that the Facility generated hazardous waste streams in quantities that exceeded the threshold amount of 100 kgs per month for a small quantity generator and 1,000 kgs per month for a large quantity generator for the periods that such waste remained onsite.

The alleged violations are stated to have included:

- Failure to timely notify EPA or Louisiana of its hazardous waste activities during August 2021 and November 2021.
- Failure to comply with manifest requirements.
- Failure to make adequate hazardous waste determinations.
- Failure to meet the standards for the management of used oil.

The CAFO requires that HOS within 60 calendar days of its effective date has assessed all its solid waste streams at the Facility to determine accurate waste codes and it has developed and implemented standard operating procedures to ensure that it is operating the Facility in compliance with RCRA and the

regulations. Further, it must certify it has accurately and adequately complied with its RCRA Section 3010 Notification, and provide with its certification a copy of the Facility's SOPs.

HOS neither admits nor denies the factual and legal conclusions in the CAFO.

A civil penalty of \$50,000.00 is assessed.

A copy of the CAFO can be downloaded [here](#).