

INSPECTION REPORT

Inspection Entry Date/Time	05/23/2024 10:30 (CT)		Announced: No	
Inspection Exit Date/Time	05/23/2024 11:30 (CT)		Access: Granted	
Regulatory Program	RCRA			
Type of Inspection	Focused Compliance Inspection (FCI)			
Facility or Site Name	GV Launch Services			
Facility/Site Identifier	None			
Facility/Site Physical Address	802 Bishop Rd			
City, State, Zip Code	Ingleside, TX 78362			
County/Borough	San Patricio County			
Generator Status	N/A			
NAICS	None			
Type of Operation	GV Launch performs lightering services and launch services at its docks.			
Geographic Coordinates	27.857015, -97.171622			
Additional Persons Participating in Inspection:				
Name	Title	Organization	Email	Phone
Cameron Tanaka	Contractor	Eastern Research Group (ERG)	Cameron.Tanaka@erg.com	(508) 314-6432
Erin Young-Dahl	Inspector	EPA REGION 6	YoungDahl.Erin@epa.gov	(214) 665-3166
John Penland	Inspector	EPA REGION 6	Penland.John@epa.gov	(214) 665-9717
Lead Inspector:				
Brook McKeown				09/03/2024
	ERG		Brook.McKeown@erg.com	(410) 459-5811

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

The Port of Corpus Christi 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 other 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	Brook McKeown	(410) 459-5811	Brook.McKeown@erg.com	Yes	No
RCRA Inspector/ Contractor/ERG	Cameron Tanaka	(508) 314-6432	Cameron.Tanaka@erg.com	Yes	No
Inspector/Enforcement Officer/EPA Region 6	Erin Young-Dahl	(214) 665-3166	YoungDahl.Erin@epa.gov	Yes	Yes
Inspector/Enforcement Officer/EPA Region 6	John Penland	(214) 665-9717	Penland.John@epa.gov	Yes	Yes

Facility General Description

Tenant/Area	Inspection Date	Process Description	Area of Concern
GV Launch Services	05/23/24	GV Launch Services (GV Launch) performs lightering services and launch services at its docks. Lightering services include transferring APHIS regulated garbage, used oil, incinerator ash, and general trash from vessels to their own vessel, then transferring the waste to either vessels or trucks owned by Nature Environmental or ACCP, Inc. GV Launch transports this waste from vessels on the water to their vessel or unload wastes at their dock to take to another location. The company performs maintenance on its own vessel and generates used oil. GV Launch does not maintain a MARPOL COA.	Yes

SECTION II – OBSERVATIONS

Tenant: GV Launch Services			
Section: 2.1	Date: 05/23/24, 10:30 AM	Contains AOC: Yes	Contains CBI: No
Lead Inspector: Brook McKeown	Attendees: Debbie Parker (Office Manager), Mark Seamone (Owner)		
GV Launch Services (GV Launch) performs lightering services and launch services at its docks, which the company leases from the Valls Port Terminal Dock. GV Launch has one vessel. Lightering services include transferring APHIS regulated garbage, used oil, oily water, incinerator ash, and general trash from vessels to their own vessel, then transferring the waste to either vessels or trucks owned by Nature Environmental or ACCP, Inc. They transport this waste from vessels on the water to their vessel or unload wastes at their dock to take to another location. GV Launch does not store any waste on its docks, since the waste is immediately transferred to another transporter, which takes the waste to its destination facility. The facility maintains records of used oil transports with USDA manifests, and the used oil it transports is typically delivered to Nature Environmental or ACCP, Inc. Shipping agents, such as Valls Ship Agency, GAC Shipping, Max Shipping, and Gulf Harbor Shipping, contact GV Launch to perform loadouts. GV Launch also loads supplies such as water, groceries, and parts onto other vessels. The company performs maintenance on its own vessel and generates used oil. GV Launch does not maintain a MARPOL COA. The facility does not have an EPA ID. The inspection team reviewed several of the company’s exchange tickets, which act as transfer manifests, and noted no issues. The inspection team noted that these tickets documented the amounts and contents of the materials GV Launch was transferring. Some of the tickets showed that incinerator ash was being transferred from GV Launch’s vessel to a landing company on the shore or over the water. The inspection team performed a visual inspection of the facility’s general yard area, warehouse, and dock area. In the general yard area outside of the warehouse, the inspection team observed seven used oil containers that did not have labels (see Appendix 1 – Photo 1) [AOC #1 – GV Launch did not clearly label containers used to store used oil with the words “Used Oil” – 40 CFR 279.22(c)(1)]. Six of these used oil containers were 225-gallon totes and one was a 350-gallon tote. In her follow-up email from 05/29/24 (see Appendix 2), Ms. Parker included photographs of each of these used oil containers, which had been labeled as “waste oil” since the inspection (see Appendix 3). A closing conference was conducted at approximately 11:30 PM with GV Launch personnel. The AOC was communicated to GV Launch during the closing conference; however, further EPA review may change or add to their potential AOCs.			

SECTION III – RECORDS REVIEW

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

SECTION IV – AREAS OF CONCERN

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

Tenant: GV Launch Services		
AOC #1 – GV Launch 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

SECTION V – FOLLOW UP

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

Communication Log

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

1. 05/29/24 GV Launch email – Debbie Parker sent an email containing photographs of each of the used oil containers with labels.

SECTION VI – LIST OF APPENDICES

Appendix 1. Photograph Log

Appendix 2. Follow-Up Email from GV Launch

Appendix 3. Follow-Up Photographs from GV Launch

APPENDIX 1.
PHOTOGRAPH LOG



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Photograph Log

Photo No. 1

Location: GV Launch Services		
City: Ingleside	County/Parish: San Patricio	State: Texas



Photo File Name: DSCN1123

Date of Photo: 05/23/2024

Time of Photo: 11:27 hrs.

Photographer: Cameron Tanaka

Description: View of seven used oil containers without labels in the general yard area outside of the warehouse. Six of these used oil containers were 225-gallon totes and one was a 350-gallon tote.

APPENDIX 2.
FOLLOW-UP EMAIL FROM GV LAUNCH

RE: GV Launch Services - POCCA Week 3 EPA RCRA Inspections

Debbie Parker <debbie@gvlaunchservices.com>

Wed 2024-05-29 10:51 AM

To: Brook McKeown <Brook.McKeown@erg.com>

Cc: Penland, John <Penland.John@epa.gov>; Young-Dahl, Erin <YoungDahl.Erin@epa.gov>; Cameron Tanaka <Cameron.Tanaka@erg.com>; info@gvlaunchservices <info@gvlaunchservices.com>

📎 1 attachments (49 KB)

EPA INFO.zip;

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

Good Morning Brook,

I've had all the totes labeled as per advised, it just took me a few days to get the pictures taken which are attached. Going forward we will make sure that everything is labeled properly.

Thanks so much for all the helpful information and if you have any questions or concerns please just let me know.

Sincerely,

Debbie Parker

Genesis Ventures LLC

GV Launch Services Inc.



361-280-0764 Office (24 Hour)

832-814-0130 Mobile

802 Bishop Road

Ingleside, Texas 78336

info@gvlaunchservices.com

www.GVLaunchServices.com

From: Brook McKeown <Brook.McKeown@erg.com>

Sent: Thursday, May 23, 2024 7:15 PM

To: Debbie Parker <debbie@gvlaunchservices.com>; Mark Seamone <mark@gvlaunchservices.com>; info@gvlaunchservices <info@gvlaunchservices.com>

Cc: Penland, John <Penland.John@epa.gov>; Young-Dahl, Erin <YoungDahl.Erin@epa.gov>; Cameron Tanaka <Cameron.Tanaka@erg.com>

Subject: GV Launch Services - POCCA Week 3 EPA RCRA Inspections

Debbie, Mark –

Thank you again for your time today during EPA's RCRA inspection of GV Launch Services' operations at 802 Bishop Road in Ingleside, TX. As discussed during our closing today, below is a list of areas of concern from the inspection today. If you have any responses or documented corrective actions to any of the areas of concern listed below, you can provide that information by June 6th and it will be incorporated into the inspection report.

Area of Concern:

- Seven totes of used oil generated by GV were observed in the yard adjacent to the warehouse that were not labeled as "used oil".

Don't hesitate to reach out with any questions.

Brook



Brook McKeown

(She/They)

Chemical Engineer

Cell: 410-459-5811

Email: brook.mckeown@erg.com

www.erg.com

APPENDIX 3.
FOLLOW-UP PHOTOGRAPHS FROM GV LAUNCH



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