

INSPECTION REPORT

Inspection Entry Date/Time	05/23/2024 08:45 (CT)		Announced: No	
Inspection Exit Date/Time	05/23/2024 10:15 (CT)		Access: Granted	
Regulatory Program	RCRA			
Type of Inspection	Focused Compliance Inspection (FCI)			
Facility or Site Name	Brown Water Marine Service			
Facility/Site Identifier	None			
Facility/Site Physical Address	843 Bishop Road			
City, State, Zip Code	Ingleside, TX 73862			
County/Borough	San Patricio County			
Generator Status	N/A			
NAICS	None			
Type of Operation	Brown Water Marine Service is a barge transport company, operating between Houston, Bolivar, and Brownsville.			
Geographic Coordinates	27.853413, -97.174173			
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 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
Brown Water Marine Service	05/23/24	Brown Water Marine Service (Brown Water) is a barge transport company, operating between Houston, Bolivar, and Brownsville. Brown Water uses inland tow boats to transport barges. The location in Ingleside is a fleeting location where customers park their barges. Brown Water performs maintenance including overhauls and fueling for its own vessels. The company also fuels, provides water, and receives bilge slop, used oil, used oil filters, and trash from its own vessels and other vessels. The facility does not maintain a MARPOL COA.	No

SECTION II – OBSERVATIONS

Tenant: Brown Water Marine Service			
Section: 2.1	Date: 05/23/24, 8:45 AM	Contains AOC: No	Contains CBI: No
Lead Inspector: Brook McKeown	Attendees: Tabitha Brown (Operations)		
Brown Water began as an oil field service company servicing oil rigs and smaller vessels in 1989. Since then, Brown Water has transitioned to being a barge transport company. The company uses inland tow boats to transport these barges between Houston, Bolivar, and Brownsville. Its customers' barges carry materials such as sugar, crude oil, fertilizer, and scrap metal. Brown Water does not transport waste barges, and it always knows what its customers' barges are carrying before transporting them. This location, in Ingleside, is a fleeting location where customers park their barges. Brown Water also has a couple of small barges that mostly stay in Ingleside. Brown Water performs maintenance including overhauls and fueling for its own vessels. The company also fuels, provides water, and receives bilge slop, used oil, used oil filters, and trash from its own vessels and other vessels at the Ingleside location. Oil filters and oil contaminated debris are collected and disposed of off-site by Sun Coast Resources. Brown Water has a bilge slop tank and a used oil tank. The company has third parties such as Western Gulf Recycling empty these tanks out about 2-3 times per month. To keep track of these activities, the company's maintenance manager runs a ticketing system. Brown Water also generates used batteries that are removed from site once a week. Brown Water does not receive, store, or transport solid or hazardous waste and does not have an EPA ID number. The facility does not maintain a MARPOL COA. During the inspection, the inspection team performed a visual inspection of Brown Water's general yard area, maintenance shop, and tanks and oily debris area. In the maintenance shop, the company's maintenance manager explained that Valley Solvents in Corpus Christi, TX handles all its paint waste, which is collected in 55-gallon drums. Brown Water also contracts for Valley Solvents to perform most of the painting at the facility, although Brown Water does some painting itself. In addition, Valley Solvents manages Brown Water's used parts washer solvents, including testing the solvent. When viewing the tanks, Brown Water personnel indicated that vessels use their own pumps to put bilge slop or used oil into the tanks. The team noted that the used oil tank and the containers for used oil filters had proper labels. After the visual inspection, the inspection team viewed fueling tickets that included dropping off trash, bilge water, filters, and used oil. The inspection team noted no issues with these tickets. No areas of concern (AOCs) were identified during the visual inspection; however, further EPA review may change or add to their potential AOCs. A closing conference was conducted at approximately 10:00 AM with Brown Water personnel. On 05/24/2024, Ms. Brown followed up with an email stating that Brown Water does not have a MARPOL COA (see Appendix 1).			

SECTION III – RECORDS REVIEW

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

SECTION IV – AREAS OF CONCERN

No areas of concern were found during the inspection.

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. 05/24/24 Brown Water email – Tabitha Brown sent an email clarifying that Brown Water does not have a MARPOL COA.

SECTION VI – LIST OF APPENDICES

Appendix 1. Follow-Up Email from Brown Water

APPENDIX 1.
FOLLOW-UP EMAIL FROM BROWN WATER

RE: Brown Water Marine Services - POCCA Week 3 EPA RCRA Inspection

Tabitha Brown <TBrown@brownwatermarine.com>

Fri 2024-05-24 8:57 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>; John Rooney <jrooney@brownwatermarine.com>

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

Hi Brook,

We do not have a MARPOL COA, as mentioned yesterday, there is a way to lookup all facilities with a MARPOL COA on the [USCG website](#).

The subject of the email references POCCA, please note that while we operate in the Port Corpus Christi area, we are not Port owned property.

Thanks,

Tabitha D. Brown
Brown Water Marine Service, Inc.
Mile 533 Marine Ways Inc.
P.O. Box 2269
Rockport TX 78381
Office: 361 776 7300
Cell: 361 523 8101
www.brownwatermarine.com

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

Sent: Thursday, May 23, 2024 8:01 PM

To: Tabitha Brown <TBrown@brownwatermarine.com>

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

Subject: Brown Water Marine Services - POCCA Week 3 EPA RCRA Inspection

Tabitha –

Thank you again for your time today during EPA's RCRA inspection of Brown Water Marine Service's operations at 843 Bishop Road in Ingleside. As discussed during our closing today, we had one follow-up question. If you could please confirm whether Brown Water has a MARPOL COA with the USCG and if you do, please provide a copy. Please provide a response by no later than June 6th.

Thanks,

Brook



Brook McKeown

(She/They)

Chemical Engineer

Cell: 410-459-5811

Email: brook.mckeown@erg.com

www.erg.com

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