

INSPECTION REPORT

Inspection Entry Date/Time	06/18/2025 1:10 PM (CT)	Announced: Yes
Inspection Exit Date/Time	06/18/2025 1:55 PM (CT)	Access: Granted
Regulatory Program	RCRA	
Type of Inspection	Compliance Evaluation Inspection (CEI)	
Facility or Site Name	Bludworth Marine LLC	
Facility/Site Identifier	TXR000084316	
Facility/Site Physical Address	2599 S. Childers Rd	
City, State, Zip Code	Orange, TX 77630	
County/Borough	Orange	
Generator Status	Not a generator	
NAICS	336611	
Type of Operation	Bludworth Marine LLC (BM) performs repairs and maintenance on marine vessels.	
Geographic Coordinates	29°46'32.15"N, 95° 6'8.72"W	

Additional Persons Participating in Inspection:			
Name	Title	Organization	Email
Andrew Swingler	Contractor	Eastern Research Group (ERG)	Andrew.Swingler@erg.com
Lead Inspector:			
Janosh Wolters		Digitally signed by Janosh Wolters Date: 2025.07.23 20:13:13 -04'00'	
Janosh Wolters	Contractor	Eastern Research Group (ERG)	Janosh.Wolters@erg.com

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

The Port of Orange and surrounding facilities were selected for inspection based on a 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 other records, including photographs taken, verbal or written statements made during or after the on-site inspection, and/or materials shown, demonstrated, or submitted to the Environmental Protection Agency (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	Opening Conf.	Closing Conf.
Lead Inspector/Contractor/ERG	Janosh Wolters	Yes	Yes
RCRA Inspector/Contractor/ERG	Andrew Swingler	Yes	Yes
Manager/Bludworth Marine LLC	Linwood Boudreaux	Yes	Yes
Safety/Bludworth Marine LLC	Moses Garza	Yes	Yes

Facility General Description

Tenant/Area	Inspection Date	Process Description	Area of Concern
Bludworth Marine LLC	6/18/2025	BM performs repairs and maintenance on marine vessels. The facility maintains a MARPOL COA but does not transfer or transport wastes off ships.	Yes

SECTION II – OBSERVATIONS

Facility: Bludworth Marine LLC			
Section: 2.1	Date: 06/18/25, 1:10 PM	Contains AOC: Yes	Contains CBI: No
Lead Inspector: Janosh Wolters	Attendees: Linwood Boudreaux and Moses Garza		
BM, located in Orange, TX, conducts repairs and maintenance of marine vessels. The facility operates a dry dock and has travel lift capabilities for vessel repair projects. Mr. Boudreaux stated that the primary waste stream generated at the facility is used oil generated from routine maintenance on BM's equipment. Additionally, Mr. Boudreaux explained that BM occasionally generates paint waste from touch-up painting on vessels. BM was not generating or accumulating paint waste at the time of the inspection. In cases where a vessel requires tank cleaning prior to maintenance, BM performs the cleaning and manages the waste generated during the process. BM primarily cleans out bilges. BM manages waste generated from bilges as used oil. BM does not clean out tanks that generate hazardous wastes as they are not able to manage to manage hazardous waste. BM is registered with the EPA as a non-generator of hazardous waste under EPA ID TXR000084316. The facility maintains a MARPOL COA but does not transfer or transport wastes off ships. After the opening conference, the inspection team observed BM's used oil and waste storage area. The inspection team observed approximately twelve 325-gallon totes accumulating wash water from tank cleaning operations. Mr. Boudreaux stated the facility also stores used oil in this location but did not have any used oil on site at the time of the inspection. The inspection team visually observed one tote labeled as "Used Oil". Mr. Boudreaux stated this was incorrectly labeled and was accumulating dirty wash water. Next, the inspection team observed two lead acid batteries that were being managed as universal waste. The batteries were not labeled and did not have an accumulation start date. (see Appendix 1 – Photo 2) [AOC #1 – BM did not label individual batteries or their containers "Universal Waste-Battery(ies)," or "Waste Battery(ies)," or "Used Battery(ies)"- 40 CFR 273.14(a)] and [AOC #2 – BM did not demonstrate the length of time that the universal waste has been accumulated from the date it becomes waste – 40 CFR 273.15(c)] Next, the inspection team observed the dock space. BM was working on one vessel at the time of the visual inspection. The inspection team did not observe any waste being accumulated at the dock space. Mr. Boudreaux stated that waste that is generated during vessel repairs is brought directly to the waste accumulation area. The areas of concern (AOCs) observed by the inspection team at the time of the inspection are documented above. However, upon further review, EPA may change or add additional AOCs. A closing conference was conducted at approximately 1:55 PM with BM personnel. The AOC was communicated during the closing.			

SECTION III – RECORDS REVIEW

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

SECTION IV – AREAS OF CONCERN

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

Facility: Bludworth Marine LLC		
AOC #1 – BM did not label individual batteries or their containers “Universal Waste-Battery(ies),” or “Waste Battery(ies),” or “Used Battery(ies).”	Citation: 40 CFR 273.14(a)	Section: 2.1
AOC #2 – BM did not demonstrate the length of time that the universal waste has been accumulated from the date it becomes waste – 40 CFR 273.15(c).	Citation: 40 CFR 273.15(c)	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 the provision of documents requested.

Communication Log

24 hours prior to the on-site inspection, Erin Young-Dahl (EPA Region 6) notified the Port of Orange that ERG would be performing on-site inspections throughout the Port area. The Port of Orange notified BM that ERG would be performing at CEI at the facility in the afternoon on 6/18/2025.

SECTION VI – LIST OF APPENDICES

Appendix 1. Photograph Log

APPENDIX 1.
PHOTOGRAPH LOG

Location: Bludworth Marine LLC		
City: Baytown	County/Parish: Harris	State: Texas



Photo No. 1

Photo File Name: DSCN8772

Date of Photo: 6/18/2025

Time of Photo: 1330 hrs.

Photographer: Janosh Wolters

Description: View of the universal waste collected on site in the waste storage area. The batteries were not labeled and did not have an accumulation start date.

Location: Bludworth Marine LLC		
City: Baytown	County/Parish: Harris	State: Texas



Photo No. 2

Photo File Name: DSCN8773

Date of Photo: 6/23/2025

Time of Photo: 1331 hrs.

Photographer: Janosh Wolters

Description: Overview of waste storage area. Mr. Boudreaux stated all totes are accumulating wash water from washing vessels.