

INSPECTION REPORT

Inspection Entry Date/Time	11/6/2024 8:40 (CT)		Announced: No (tenants and related facilities)	
Inspection Exit Date/Time	11/6/2024 9:25 (CT)		Access: Granted	
Regulatory Program	RCRA			
Type of Inspection	Focused Compliance Inspection (FCI)			
Facility or Site Name	Sun Coast Resources			
Facility/Site Identifier	TXR000081384			
Facility/Site Physical Address	5255 W Cardinal Drive			
City, State, Zip Code	Beaumont, TX 77705			
County/Borough	Jefferson County			
Generator Status	Non-generator			
NAICS	424720			
Type of Operation	Sun Coast Resources is a fuel delivery company and transfer facility for used oil.			
Geographic Coordinates	30.045709, -94.13958			
Additional Persons Participating in Inspection:				
Name	Title	Organization	Email	Phone
Angela Hays	Inspector	EPA REGION 6	Hays.Angela@epa.gov	(214) 665-2285
Sandesh Thapa	Inspector	EPA REGION 6	Thapa.Sandesh@epa.gov	(214) 665-2265
Jon Herbay	Contractor	Eastern Research Group (ERG)	Jon.Herbay@erg.com	(412) 780-9931
Lead Inspector:				
Vince Damiano	Chemical Engineer			02/06/2025
	ERG	Vince.Damiano@erg.com		(703) 633-1732

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

The Port of Beaumont 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, port-related facilities, 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 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	Phone	Email	Opening Conf.	Closing Conf.
Lead Inspector/ Contractor/ERG	Vince Damiano	(703) 633-1732	Vince.Damiano@erg.com	Yes	Yes
Inspector/Enforcement Officer/EPA Region 6	Angela Hays	(214) 665-2285	Hays.Angela@epa.gov	Yes	Yes
Inspector/Enforcement Officer/EPA Region 6	Sandesh Thapa	(214) 665-2265	Thapa.Sandesh@epa.gov	Yes	Yes
RCRA Inspector/ Contractor/ERG	Jon Herbay	(412) 780-9931	Jon.Herbay@erg.com	Yes	Yes
Sun Coast Resources	Ken Herbert	(409) 295-1952	KHerbert@SunCostResources.com	Yes	Yes
Sun Coast Resources	Susan Tyler		Susan.Tyler@Reladyne.com	Yes	Yes
Sun Coast Resources	Taylor Schauder		T.Schauder@SunCoastResources.com	Yes	Yes

Facility General Description

Tenant/Area	Inspection Date	Process Description	Area of Concern
Sun Coast Resources	11/06/24	Sun Coast Resources (SCR) is a fuel delivery company and transfer facility for used oil. SCR is also registered as a used oil transporter. The facility is land-based and does not operate under a MARPOL COA.	Yes

SECTION II – OBSERVATIONS

Tenant: Sun Coast Resources			
Section: 2.1	Date: 11/06/24, 08:40 AM	Contains AOC: Yes	Contains CBI: No
Lead Inspector: Vince Damiano	Attendees: Ken Herbert (Manager), Susan Tyler, Taylor Schauder		
SCR is located in Beaumont, TX, and operates as a fuel delivery company mainly delivering dyed diesel and lubricants to local customers. SCR also operates as a used oil transporter and transfer facility (TXR000081384). SCR typically picks up used oil in 300-gallon totes, used oil filters in 55-gallon drums, and oily water is transported by a vacuum truck. However, SCR’s vacuum truck has been out of service for approximately three months at the time of the inspection. SCR stores used oil on site for two weeks before being shipped on a box truck to the Sun Coast Resources Headquarters in Houston to be recycled (TX0000095067). Mr. Herbert explained to the inspection team that SCR will sometimes store used oil in their 4,000-gallon used oil tank, but they typically do not manage enough used oil to use the tank. Any used oil generated by SCR operations will be drummed up and stored on-site until it is shipped to the headquarters for recycling with used oil from customers. SCR does not operate on dock spaces and a MARPOL COA would not apply to their operations. Following the opening conference, the inspection team conducted a visual inspection of SCR’s storage areas. The inspection team first observed the transfer used oil storage area located behind the facility on a loading dock. The inspection team observed eleven 300-gallon totes, but only six of the totes were storing used oil (Appendix 1 – Photos 1 to 5). The used oil was not stored in a secondary containment system which is a requirement for a used oil transfer facility [AOC #1: SCR, a used oil transfer facility, did not store used oil in secondary containment – 40 CFR 279.45(d)]. The inspection team observed that two of the totes storing used oil did not contain a label or marking “Used Oil” (see Appendix 1 – Photos 4 and 5) [AOC #2: SCR did not clearly label containers used to store used oil with the words “Used Oil.” – 40 CFR 279.22 (c)(1)]. On the same loading dock where the used oil is stored, the inspection team observed three 55-gallon drums that were labeled as empty, but two of the drums were half-full storing liquid. At the time of the inspection, Mr. Herbert was unsure about the contents of the two drums storing liquid [AOC #3: SCR did not make a hazardous waste determination – 40 CFR 262.11]. The inspection team walked through the operating area and observed the 4,000-gallon used oil tank. However, the storage tank was empty at the time of the inspection. The inspection team did not observe other areas of concern (AOCs) at the time of the inspection; however, further EPA review may change or add to these potential AOCs. The closing conference was conducted at approximately 09:20 AM with SCR personnel. The AOCs were communicated during the closing. Following the inspection on 11/12/2024, Taylor Schauder sent an email to the inspection team responding to the AOCs observed during the inspection. In the response, SCR added labels to any used oil totes missing labels, added an expandable soft berm to act as a secondary containment for used oil, and determined the two unknown			

55-gallon drums were used oil. The response includes photographs (see Appendix 2).

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: Sun Coast Resources		
AOC #1 – SCR, a used oil transfer facility, did not store used oil in secondary containment.	Citation: 40 CFR 279.45(d)	Section: 2.1
AOC #2 – SCR 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
AOC #2 – SCR did not make a hazardous waste determination.	Citation: 40 CFR 262.11	Section: 2.1

SECTION V – FOLLOW UP

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. 11/12/24 SCR email – Taylor Schauder sent a follow-up addressing concerns found during the inspection.

SECTION VI – LIST OF APPENDICES

Appendix 1. Photograph Log

Appendix 2. SCR 11/12/24 Response

APPENDIX 1. PHOTO LOG



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Location: Sun Coast Resources		
City: Beaumont	County/Parish: Jefferson	State: Texas
 A photograph showing four large, white, 300-gallon metal totes stacked in a row. The totes are filled with a dark liquid, likely used oil. The photo is taken from a slightly low angle, showing the side of the totes. A timestamp "11.06.2024 09:07" is visible in the bottom right corner of the photo.		

Photo No. 1

Photo File Name: DSCN7656

Date of Photo: 11/06/2024

Time of Photo: 09:07 hrs.

Photographer: Vince Damiano

Description: View of four 300-gallon totes (far right tote is empty) storing used oil on SCR's used oil storage area located on its loading dock.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Location: Sun Coast Resources		
City: Beaumont	County/Parish: Jefferson	State: Texas
 The photograph shows four large, white, 300-gallon metal totes stacked in a storage area. The totes are arranged in two rows of two. The totes are filled with a dark liquid, likely used oil. A timestamp "11.06.2024 09:07" is visible in the bottom right corner of the photo. A label on one of the totes reads "flush 704".		

Photo No. 2

Photo File Name: DSCN7657

Date of Photo: 11/06/2024

Time of Photo: 09:07 hrs.

Photographer: Vince Damiano

Description: View of four 300-gallon totes (far right tote is empty) storing used oil on SCR's used oil storage area located on its loading dock.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Location: Sun Coast Resources		
City: Beaumont	County/Parish: Jefferson	State: Texas
 11.06.2024 09:07		

Photo No. 3

Photo File Name: DSCN7658

Date of Photo: 11/06/2024

Time of Photo: 09:07 hrs.

Photographer: Vince Damiano

Description: Overview of used oil storage loading dock. The totes on the left side of the photos and the totes on the right side are storing used oil.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Photograph Log

Location: Sun Coast Resources		
City: Beaumont	County/Parish: Jefferson	State: Texas



The photograph shows a large, white, rectangular plastic tote (IBC) with a metal cage, partially filled with a dark liquid. The tote is situated in a storage area with other similar totes visible in the background. A date and time stamp "11.06.2024 09:08" is visible in the bottom right corner of the photo. There is also some handwritten text "W 6/26" on the tote.

Photo No. 4

Photo File Name: DSCN7659

Date of Photo: 11/06/2024

Time of Photo: 09:08 hrs.

Photographer: Vince Damiano

Description: View of a half-full 300-gallon tote in the used oil storage dock that was not labeled as "Used Oil."



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Location: Sun Coast Resources		
City: Beaumont	County/Parish: Jefferson	State: Texas

A photograph showing a large, orange, cylindrical 300-gallon tote (intermediate bulk container) on a metal storage rack. The tote is partially filled with a dark liquid. To the left of the tote, a white sign is visible with the text "Sun Coast RESOURCES, INC. Fuels & Lubricants 9600 • 800-677-FUEL". The background shows a dark, industrial interior with wooden slats. An orange timestamp "11.06.2024 09:08" is overlaid in the bottom right corner of the photo.

11.06.2024 09:08

Photo No. 5

Photo File Name: DSCN7660

Date of Photo: 11/06/2024

Time of Photo: 09:08 hrs.

Photographer: Vince Damiano

Description: View of a half-full 300-gallon tote on the used oil storage dock that was not labeled as "Used Oil."



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Location: Sun Coast Resources		
City: Beaumont	County/Parish: Jefferson	State: Texas
 A photograph showing three black 55-gallon drums stacked on a wooden pallet. The drums are in a warehouse or loading dock setting. The drum on the right has a white label that reads "ENGINE OIL" and "SYNTHETIC BLEND SAE 0W-20". A timestamp "11.06.2024 09:11" is visible in the bottom right corner of the photo.		

Photo No. 6

Photo File Name: DSCN7661

Date of Photo: 11/06/2024

Time of Photo: 09:11 hrs.

Photographer: Vince Damiano

Description: View of three 55-gallon drums found on the loading dock that were labeled as empty. However, the drums on the right and left of the photo were half-full of an unknown liquid.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Location: Sun Coast Resources		
City: Beaumont	County/Parish: Jefferson	State: Texas

The image shows a large black metal drum of Engine Guard Synthetic Blend SAE 0W-20 motor oil. The label is white with black text and a barcode. The drum is on a loading dock. The text on the label includes "ENGINE GUARD® SYNTHETIC BLEND SAE 0W-20", "API SERVICE SP, SN PLUS (RESOURCE CONSERVING), ILSAC GF-6", and "55 GAL - 208.2 L". A timestamp "11.06.2024 09:11" is visible in the bottom right corner of the photo.

Photo No. 7

Photo File Name: DSCN7662

Date of Photo: 11/06/2024

Time of Photo: 09:11 hrs.

Photographer: Vince Damiano

Description: View of product label on one of the 55-gallon drums storing liquid on the loading dock.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Location: Sun Coast Resources		
City: Beaumont	County/Parish: Jefferson	State: Texas

A close-up photograph of the top of a dark, cylindrical 55-gallon drum. The drum is lying on its side. A white label is affixed to the top surface, featuring the text "Empty" in a handwritten style, a barcode, and the number "1077625". Below the barcode, the label reads "ENGINE GUARD® SYNTHETIC BLEND SAE 0W-20" and "55 GAL - 208.2 L". A metal bung is visible in the center of the drum's top. A timestamp "11.06.2024 09:11" is printed in orange in the bottom right corner of the photo.

Photo No. 8

Photo File Name: DSCN7663

Date of Photo: 11/06/2024

Time of Photo: 09:11 hrs.

Photographer: Vince Damiano

Description: Close-up view of the top of one of the 55-gallon drums storing liquid where the "empty" label is visible.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Location: Sun Coast Resources		
City: Beaumont	County/Parish: Jefferson	State: Texas
 11.06.2024 09:11		

Photo No. 9

Photo File Name: DSCN7664

Date of Photo: 11/06/2024

Time of Photo: 0911 hrs.

Photographer: Vince Damiano

Description: Overview of three 55-gallon drums found on the loading dock that were labeled as empty. However, the drums on the right and left of the photo were half-full of an unknown liquid.

APPENDIX 2. SCR 11/12/24 RESPONSE



November 11, 2024

Mr. Vince Damiano
US Environmental Protection Agency Region 6
1201 Elm Street, Suite 500
Dallas, TX 75270

Subject: EPA RCRA Investigation at Sun Coast Resources Beaumont Terminal

Dear Mr. Damiano:

The following serves as Sun Coast Resources LLC (SCR) response to the US Environmental Protection Agency (EPA) RCRA investigation at 5255 W Cardinal Dr., Beaumont, TX 77705. During the investigation three Areas of Concern (AOC) were noted by the investigators. SCR has completed the corrective actions for the three AOC and have documentation below.

Area of Concern 1: Some used oil totes were not visibly labeled (side facing out) as used oil.

Corrective action- SCR has placed outward facing labels on all used oil totes that required them. Please see below for photographic documentation.



Area of Concern 2: Two drums were mistakenly labeled as empty; one filter drum did not have a lock ring securing the lid.

Corrective action- Labels were placed on the two unlabeled drums and a lock ring was installed on the third drum securing the lid. Please see below for photographic documentation.



Area of Concern 3: Used oil tote storage area did not have secondary containment.

Corrective action- Used oil totes were moved inside an expandable soft berm on the loading dock.





If you have questions or need additional information, please do not hesitate to contact me at (713) 969-3809. Thank you for your assistance in this matter.

Sincerely,

Taylor Schauder

Environmental Compliance Specialist