

Region 6 - Enforcement & Compliance Assurance Division
INSPECTION REPORT

Inspection Date(s):	12/8/2022	
Media Program:	RCRA Compliance Evaluation Inspection	
Regulatory Program(s)	RCRA Very Small Quantity Generator	
Company Name:	Gulf Copper & Manufacturing	
Facility Name:	Galveston Dry Dock and Rig Repair	
Facility Physical Location:	2920 Todd Rd	
(city, state, zip code)	Galveston, TX 77554	
Mailing address:	5700 Procter Ext.	
(city, state, zip code)	Port Arthur, TX 77642	
County/Parish:	Galveston	
Facility Phone Number	(409) 941-6200	
Facility Contact:	Mike Haughton	Corporate Risk Manager
	mhaughton@gulfcopper.com	
FRS Number:	N/A	
Identification/Permit Number:	Wastewater discharge # WQ00007790000	
Media Identifier Number:	EPA ID # TXD008077372	
NAICS:	336611 - SHIP BUILDING AND REPAIRING	
SIC:		
Personnel participating in inspection:		
Erin Young-Dahl	EPA R6/ECD-SR	Lead Inspector
Debra Pandak	EPA R6/ECD-SR	Sr. Inspector
Bill Mansfield	EPA R6/ECD-SR	Sr. Inspector
Dedriel Gardner	EPA R6/ECD-SR	Sr. Inspector
Mike Haughton	Gulf Copper	Corporate Risk Mgr.
EPA Lead Inspector Signature/Date		
	Erin Young-Dahl – Lead Inspector	Date
Supervisor Signature/Date		
	Jeff Yurk – Waste Enforcement Section Chief	Date

Section I – INTRODUCTION

PURPOSE OF THE INSPECTION

On December 8, 2022, I, Erin Young-Dahl, conducted an unannounced inspection of the Gulf Copper & Manufacturing Dry Dock and Rig Repair facility (Gulf Copper) in Galveston, TX. The inspection focused on compliance with the Resource Conservation and Recovery Act (RCRA). I was assisted by Environmental Protection Agency (EPA) inspectors Bill Mansfield, Debra Pandak, and Dedriel Gardner. The inspection included a walkthrough of the facility's manufacturing processes and waste generation and management units as well as a review of facility records related to hazardous waste management.

The Gulf Copper facility was targeted for inspection as part of a national investigation initiative to evaluate facilities at United States of America ports of entry.

This report serves as documentation of all onsite activities and observations during the inspection of the Gulf Copper facility. A summary of all areas of concern identified during the inspection is provided in Section III.

FACILITY DESCRIPTION

The Gulf Copper facility was issued the EPA ID # TXD008077372. At the time of the inspection, Gulf Copper was operating as a Very Small Quantity Generator (VSQG) of hazardous waste.

The Gulf Copper facility repairs and maintains marine vessels and rigs for customers. Facility production operations include parts painting and blasting and ship component fabrication. The facility deals almost exclusively with steel materials. Gulf Copper also rents space throughout the facility and dock areas to store various marine equipment and vessels related to offshore operations.

Section II - OBSERVATIONS

Bill Mansfield, Debra Pandak, Dedriel Gardner, and I conducted the onsite inspection during normal daylight business hours on December 8, 2022. The Gulf Copper facility was operating normally, and all areas of the facility were in use. While there, the inspection team visited the facility's waste generation, accumulation, and management areas. I conducted an offsite document review following the inspection to assess the facility's RCRA applicability and compliance requirements.

This section provides an abbreviated description of the team's onsite activities (see Appendix 3 for a daily summary). Appendix 1 provides photographs of these observations. Unless otherwise specified, the statements cited in this section reflect those claims made by facility personnel.

The inspection team and I entered the facility at 0925 hrs., where we presented credentials and identification to Mr. Mike Haughton (Corporate Risk Manager) and informed him that we were there to conduct an inspection of the facility under the authority of Section 3007 of RCRA. I explained the right of Gulf Copper to assert a Confidential Business Information claim for records requested by the EPA,

followed by a presentation of EPA Region 6's Confidentiality Notice (40 C.F.R. § 2.203). I then facilitated an opening briefing at 0935 hrs. with Mr. Haughton, where we discussed the purpose of EPA's inspection: assessment of Gulf Copper's compliance with its requirements under RCRA.

Main Street

At 1010 hrs, we left the administrative building and began our facility tour by walking east down "Main Street," the main artery for vehicular and pedestrian traffic at the facility. Turning south onto a gravel road, we walked along the southwest side of Pier A (Appendix 2), where employees place dredge material from the harbor (Appendix 1, Photo 1). Pier A was not in use at the time of the inspection. Upon returning to Main Street, we passed two Ensco offshore rigs stored at the facility and the condemned Pier B (Appendix 2).

Pier C

We continued down Main Street at 1020 hrs. and stopped at Pier C, which was occupied by the historic battleship *U.S.S. Texas* in dry dock for repairs (Appendix 1, Photo 2). Mr. Haughton told us that most of the steel removed from the *Texas* is piled to be used later by the Battleship Texas Foundation (<https://battleshiptexas.org/>). At the time of the inspection, workers were in the process of using city water to pressure wash parts of the ship to remove foam fill. Water runoff drains into the port, and Gulf Copper has a TCEQ water discharge permit (permit # WQ00007790000, renewed in 2019). We observed scrap metal dumpsters containing corroded metal from the *Texas* (Appendix 1, Photo 4).

On the north side of Main Street, we observed a sand hopper with coal slag blast material on the ground beneath the hopper (Appendix 1, Photo 3). Mr. Haughton told us that coal slag is used instead of sand for blasting and surface preparation. We were also told that the used blast material is recycled and reprocessed offsite as road base. We also observed a drum in this area labeled as non-hazardous oily waste (Appendix 1, Photos 5 & 6). Mr. Haughton explained that once the drum was full, it would be moved to the waste storage area.

Pier D

The inspection team observed operations on Pier D, where workers were performing maintenance on a Jackup rig and a ship in dry dock (Appendix 1, Photo 8). We also noticed a frack tank on the dock that was actively taking up waste (Appendix 1, Photo 7). We asked about the tank's contents, and though Mr. Haughton did not know what specifically was in the tank, he said that sewage is the most common waste placed into these tanks. He also said that the ship offloading the waste does not carry any hazardous waste.

Fabrication Shop

The inspection team observed operations at the fabrication shop at approximately 1100 hrs. Here, steel plates used in ship component construction are welded and then assembled outside. At the time of the inspection, two ship hull cross-sections were being assembled. The team found nothing of concern in this area.

High Bay Building

At approximately 1105 hrs., we entered the High Bay Building area on the far eastern side of the Gulf Copper facility. Ship tanks are assembled here, and at the time of the inspection, there were several in-process tank constructions taking place. We observed used rags lying on the floor of the building (Appendix 1, Photo 9). We also observed workers penetrate testing with a compound called "SpotCheck" (Appendix 1, Photo 10). I noted a couple of instances where workers wiped the tank surface with a blue rag. We were told by Mr. Haughton, who asked the workers onsite, that the material on the blue rag is not a solvent.

Bill Mansfield and Mr. Haughton walked behind the High Bay Building to inspect the area and found nothing of concern.

Waste Storage Area

The inspection team observed the waste storage area at approximately 1120 hrs. Mr. Haughton told us that waste pickup is approximately every 1-2 months, but could be longer as needed, as is allowed for VSQGs. Mr. Haughton explained that upon receiving a drum request, the foreman fills out a receipt ticket in the tool room, near the docks, and paints a number identifier on the drum that correlates with a logbook. In total, there were 62 drums, including four plastic drums, one 33-gallon drum, and three cylinders (Appendix 1, Photo 11).

While in the waste storage area, we observed multiple instances of unlabeled and/or unsecured drums and/or containers in poor condition. This included two bulging drums: one undated yellow drum labeled as paint waste and one unlabeled black drum (Appendix 1, Photos 12, 15, & 16). Mr. Haughton said these drums were from a vessel and would be repackaged. We observed a corroded drum covered with a blue tarp tied around the drum to cover the top of the un-lidded drum (Appendix 1, Photo 20). Corroded fire extinguishers were next to it. We observed a heavily corroded drum containing what was labeled as "oily debris" (Appendix 1, Photo 18). We also saw an unlabeled plastic blue drum with three black gas cylinders around it (Appendix 1, Photo 19). Mr. Haughton said the cylinders had been placed there by the environmental team. For those containers with labels, the contents were identified as paint waste, oily waste, or food waste.

We walked east of the waste storage area and observed a drum that had been cut in half. The drum half was full of a reddish liquid (Appendix 1, Photo 21). At the time of the inspection, Mr. Haughton said he believed the liquid was hydraulic fluid.

Scaffold Yard

We did not observe anything of concern on the north side of the scaffold yard.

We observed a 33-gallon drum by the tarped area in the center of the scaffold yard. The container was full, and there was residue on the ground around the drum from either a container leak or overflow. The lid was covered in an oily substance (Appendix 1, Photo 22).

Blast Area

The inspection team next walked to the facility blast yard, where smaller pieces of steel are blasted using coal slag. The blast area was constructed using cargo ship containers stacked to build a 3-sided perimeter for the area. The ground in the blast area is covered in coal slag. To the north of the blast yard, we observed six 5-gallon buckets containing metal scrapings and water.

Paint Area

We walked south from the blast yard to the paint shop. Multiple workers were onsite. There, we observed two drums of paint waste and two dumpsters in the vicinity (Appendix 1, Photo 23). Of the two drums, the drum that was not as full had a closed but unsecured lid. The dumpster smelled of solvent and contained rags and empty paint cans and buckets. We also observed two open cans of paint. Workers onsite explained that the contents of the paint cans will go into one of the two drums. Once the drums of consolidated paint are full, they are sent off as paint waste. In the paint shop shed, workers use a crusher to crush empty paint cans and drums (Appendix 1, Photo 24).

Maintenance Shop

In the maintenance shop, directly west of the paint shop, the inspection team observed a tank labeled "Used Oil." Just north of the shop, we observed a type of oil on the ground by shipping containers used for storage. The oil on the ground was beneath a "Sodasorb" bucket. We also noticed a tilting blue barrel in this area labeled "WINDEX." The barrel was partially full and had an illegible waste label.

Warehouse

The final area of the facility the inspection team visited was the warehouse. We found nothing of concern in this area.

Section III – AREAS OF CONCERN

- Sixty-two containers were observed in the waste storage area. This amount may be in excess of the 1,000 kg allowed for a VSQG to accumulate without meeting additional regulations (40 CFR 262.14(a)(4)).
- The waste storage area as observed was lacking in adequate and organized aisle spacing, containers were observed open, unsecured, undated, and/or unlabeled as to their contents, and there were multiple drums in poor condition (e.g., bulging drums, heavily corroded).
- Potential for inadequate waste determination of waste stored in the waste storage area based on lack of knowledge of material in the area and lack of labels on containers (40 CFR 262.11).
- Waste characterization of used coal slag in the blasting area.
- Gulf Copper is actively receiving solid waste and possibly hazardous waste from ships and storing those containers in the waste storage area.

On December 8, 2022, we conducted a closing conference with Mr. Haughton beginning at 1225 hrs, where we addressed our areas of concern and reviewed outstanding document requests, including applicable notification documents, drum issuance logbook, waste profiles for selected wastes, and

waste management standard operating procedures. The EPA enforcement team will review these records of overall facility compliance with RCRA. The inspection team departed the facility at 1245 hrs.

Section IV – FOLLOW UP

Actions taken by Gulf Copper to resolve any areas of concern were documented by the facility with photographs or other documentation medium and submitted to the EPA via a shared electronic OneDrive folder. Any information received from the facility after the inspection was also received in this way. These documents are accessible to the assigned EPA Enforcement Officer, as applicable.

Section V – LIST OF APPENDICES

Appendix 1: Photo Log

Appendix 2: Facility Map

Appendix 3: Daily Summary

Appendix 1

Photograph Log



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 1

Location: Gulf Copper and Manufacturing Galveston Dry Dock and Rig Repair		
City: Galveston	County/Parish: Galveston	State: Texas



Photo File Name: 100_0002.jpg	Date of Photo: 12/08/2022	Time: 1014 hrs
Photographer: Debra Pandak, EPA Inspector		
Witness: Erin Young-Dahl, EPA Inspector		
Description: View of vegetated dredge material along the gravel path to Pier A. Looking southeast.		



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 2

Location: Gulf Copper and Manufacturing Galveston Dry Dock and Rig Repair		
City: Galveston	County/Parish: Galveston	State: Texas



Photo File Name: 100_0003.jpg	Date of Photo: 12/08/2022	Time: 1024 hrs
Photographer: Debra Pandak, EPA Inspector		
Witness: Bill Mansfield & Dedriel Gardner, EPA Inspectors		
Description: View of Battleship Texas in dry dock. Looking south to Pier C from Main Street.		



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 3

Location: Gulf Copper and Manufacturing Galveston Dry Dock and Rig Repair		
City: Galveston	County/Parish: Galveston	State: Texas



Photo File Name: 100_0004.jpg	Date of Photo: 12/08/2022	Time: 1030 hrs
Photographer: Debra Pandak, EPA Inspector		
Witness: Erin Young-Dahl, Dedriel Gardner, & Bill Mansfield, EPA Inspectors		
Description: Sand hopper with coal slag blast material. Looking north from Main Street.		



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 4

Location: Gulf Copper and Manufacturing Galveston Dry Dock and Rig Repair		
City: Galveston	County/Parish: Galveston	State: Texas



Photo File Name: 100_0005.jpg	Date of Photo: 12/08/2022	Time: 1035 hrs
Photographer: Debra Pandak, EPA Inspector		
Witness: Bill Mansfield & Dedriel Gardner, EPA Inspectors		
Description: Metal dumpster containing corroded steel from the Battleship Texas. Looking south-southeast from Main Street.		



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 5

Location: Gulf Copper and Manufacturing Galveston Dry Dock and Rig Repair		
City: Galveston	County/Parish: Galveston	State: Texas



Photo File Name: 100_0006.jpg	Date of Photo: 12/08/2022	Time: 1039 hrs
Photographer: Debra Pandak, EPA Inspector Witness: Erin Young-Dahl, EPA Inspector		
Description: 55-gallon drum labeled as non-hazardous "Oily Waste." View looking west from the north side of Main Street.		

Close-up view of waste label on oily waste drum along Main Street. Drum has an issued date of 11-21-2022 and no accumulation date on the label.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 7

Location: Gulf Copper and Manufacturing Galveston Dry Dock and Rig Repair		
City: Galveston	County/Parish: Galveston	State: Texas



Photo File Name: 100_0008.jpg	Date of Photo: 12/08/2022	Time: 1049 hrs
Photographer: Debra Pandak, EPA Inspector		
Witness: Dedriel Gardner, EPA Inspector		
Description: Frac tank actively managing waste on Pier D. View looking south-southeast.		



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 8

Location: Gulf Copper and Manufacturing Galveston Dry Dock and Rig Repair		
City: Galveston	County/Parish: Galveston	State: Texas



Photo File Name: 100_0009.jpg	Date of Photo: 12/08/2022	Time: 1050 hrs
Photographer: Debra Pandak, EPA Inspector		
Witness: Erin Young-Dahl, Bill Mansfield, & Dedriel Gardner, EPA Inspectors		
Description: View of maintenance and repair operations on Pier D drydock. Looking west.		



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 9

Location: Gulf Copper and Manufacturing Galveston Dry Dock and Rig Repair		
City: Galveston	County/Parish: Galveston	State: Texas



Photo File Name: 100_0010.jpg	Date of Photo: 12/08/2022	Time: 1111 hrs
Photographer: Debra Pandak, EPA Inspector		
Witness: Erin Young-Dahl, Bill Mansfield, & Dedriel Gardner, EPA Inspectors		
Description: Used rags in the High Bay Building. Rags are used to clean ship tank components during assembly.		



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 10

Location: Gulf Copper and Manufacturing Galveston Dry Dock and Rig Repair		
City: Galveston	County/Parish: Galveston	State: Texas



Photo File Name: 100_0011.jpg	Date of Photo: 12/08/2022	Time: 1114 hrs
Photographer: Debra Pandak, EPA Inspector		
Witness: Bill Mansfield, EPA Inspector		
Description: Aerosol used by facility to identify and isolate cracks or seam issues during tank assembly.		



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 11

Location: Gulf Copper and Manufacturing Galveston Dry Dock and Rig Repair		
City: Galveston	County/Parish: Galveston	State: Texas



Photo File Name: 100_0012.jpg	Date of Photo: 12/08/2022	Time: 1122 hrs
Photographer: Debra Pandak, EPA Inspector		
Witness: Dedriel Gardner, EPA Inspector		
Description: View of waste storage area, looking south from the scaffold yard.		



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 12

Location: Gulf Copper and Manufacturing Galveston Dry Dock and Rig Repair		
City: Galveston	County/Parish: Galveston	State: Texas



Photo File Name: 100_0013.jpg	Date of Photo: 12/08/2022	Time: 1123 hrs
Photographer: Debra Pandak, EPA Inspector Witness: Bill Mansfield, EPA Inspector		
Description: Photo of bulging yellow drum near the waste storage area. Waste label denotes contents as "Paint Waste."		



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 13

Location: Gulf Copper and Manufacturing Galveston Dry Dock and Rig Repair		
City: Galveston	County/Parish: Galveston	State: Texas



Photo File Name: 100_0014.jpg	Date of Photo: 12/08/2022	Time: 1126 hrs
Photographer: Debra Pandak, EPA Inspector Witness: Bill Mansfield, EPA Inspector		
Description: View of black metal drums in the waste storage area with contents awaiting disposal. Unsecured drum with blue tarp lid in the background.		



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 14

Location: Gulf Copper and Manufacturing Galveston Dry Dock and Rig Repair		
City: Galveston	County/Parish: Galveston	State: Texas



Photo File Name: 100_0015.jpg	Date of Photo: 12/08/2022	Time: 1127 hrs
Photographer: Debra Pandak, EPA Inspector		
Witness: Bill Mansfield, EPA Inspector		
Description: Close-up of a drum labeled "Food Waste" from the waste storage area.		



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 15

Location: Gulf Copper and Manufacturing Galveston Dry Dock and Rig Repair		
City: Galveston	County/Parish: Galveston	State: Texas



Photo File Name: GC_1.jpg	Date of Photo: 12/08/2022	Time: ~1130 hrs
Photographer: Mike Haughton, Gulf Copper		
Witness: Debra Pandak, EPA Inspector		
Description: Bulging black drum near waste storage area. Drum has no legible label describing its contents.		



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 16

Location: Gulf Copper and Manufacturing Galveston Dry Dock and Rig Repair		
City: Galveston	County/Parish: Galveston	State: Texas



Photo File Name: GC_2.jpg	Date of Photo: 12/08/2022	Time: ~1130 hrs
Photographer: Mike Haughton, Gulf Copper Witness: Debra Pandak, EPA Inspector		
Description: Another view of the bulging yellow drum labeled as "Paint Waste."		



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 17

Location: Gulf Copper and Manufacturing Galveston Dry Dock and Rig Repair		
City: Galveston	County/Parish: Galveston	State: Texas



Photo File Name: GC_3.jpg	Date of Photo: 12/08/2022	Time: ~1130 hrs
Photographer: Mike Haughton, Gulf Copper		
Witness: Debra Pandak, EPA Inspector		
Description: Two black drums with corroded lids. Drum in the back is closed, but unsecured.		



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 18

Location: Gulf Copper and Manufacturing Galveston Dry Dock and Rig Repair		
City: Galveston	County/Parish: Galveston	State: Texas



Photo File Name: GC_4.jpg	Date of Photo: 12/08/2022	Time: ~1130 hrs
Photographer: Mike Haughton, Gulf Copper		
Witness: Debra Pandak, EPA Inspector		
Description: Heavily corroded drum marked as "Oily Debris."		



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 19

Location: Gulf Copper and Manufacturing Galveston Dry Dock and Rig Repair		
City: Galveston	County/Parish: Galveston	State: Texas



Photo File Name: GC_5.jpg	Date of Photo: 12/08/2022	Time: ~1130 hrs
Photographer: Mike Haughton, Gulf Copper Witness: Debra Pandak, EPA Inspector		
Description: Unlabeled blue poly drum with unknown material around one of the bungs. Three black cylinders next to drum were also unlabeled.		



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 20

Location: Gulf Copper and Manufacturing Galveston Dry Dock and Rig Repair		
City: Galveston	County/Parish: Galveston	State: Texas



Photo File Name: GC_6.jpg	Date of Photo: 12/08/2022	Time: ~1130 hrs
Photographer: Mike Haughton, Gulf Copper Witness: Debra Pandak, EPA Inspector		
Description: Corroded metal drum covered with a blue tarp, tightened around the drum by rope. Corroded fire extinguishers next to the drum.		



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 21

Location: Gulf Copper and Manufacturing Galveston Dry Dock and Rig Repair		
City: Galveston	County/Parish: Galveston	State: Texas



Photo File Name: GC_7.jpg	Date of Photo: 12/08/2022	Time: ~1140 hrs
Photographer: Mike Haughton, Gulf Copper		
Witness: Debra Pandak, EPA Inspector		
Description: Unlabeled black metal drum cut in half containing a type of oily material. The modified drum did not have a lid.		



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 22

Location: Gulf Copper and Manufacturing Galveston Dry Dock and Rig Repair		
City: Galveston	County/Parish: Galveston	State: Texas



Photo File Name: GP_8.jpg	Date of Photo: 12/08/2022	Time: ~1140 hrs
Photographer: Mike Haughton, Gulf Copper Witness: Debra Pandak, EPA Inspector		
Description: Unlabeled white pony drum next to center tarped area in scaffold yard. The drum appeared to contain a type of oily liquid. We noticed residue on the ground surrounding the drum.		



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 23

Location: Gulf Copper and Manufacturing Galveston Dry Dock and Rig Repair		
City: Galveston	County/Parish: Galveston	State: Texas



Photo File Name: GC_9.jpg	Date of Photo: 12/08/2022	Time: ~1150 hrs
Photographer: Mike Haughton, Gulf Copper		
Witness: Debra Pandak, EPA Inspector		
Description: View of the outdoor paint area. Cans of paint and paint thinner are in the foreground, two black drums of paint waste and a dumpster containing rags and empty paint cans and buckets in the midground. Indoor paint area seen in the background.		



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 24

Location: Gulf Copper and Manufacturing Galveston Dry Dock and Rig Repair		
City: Galveston	County/Parish: Galveston	State: Texas

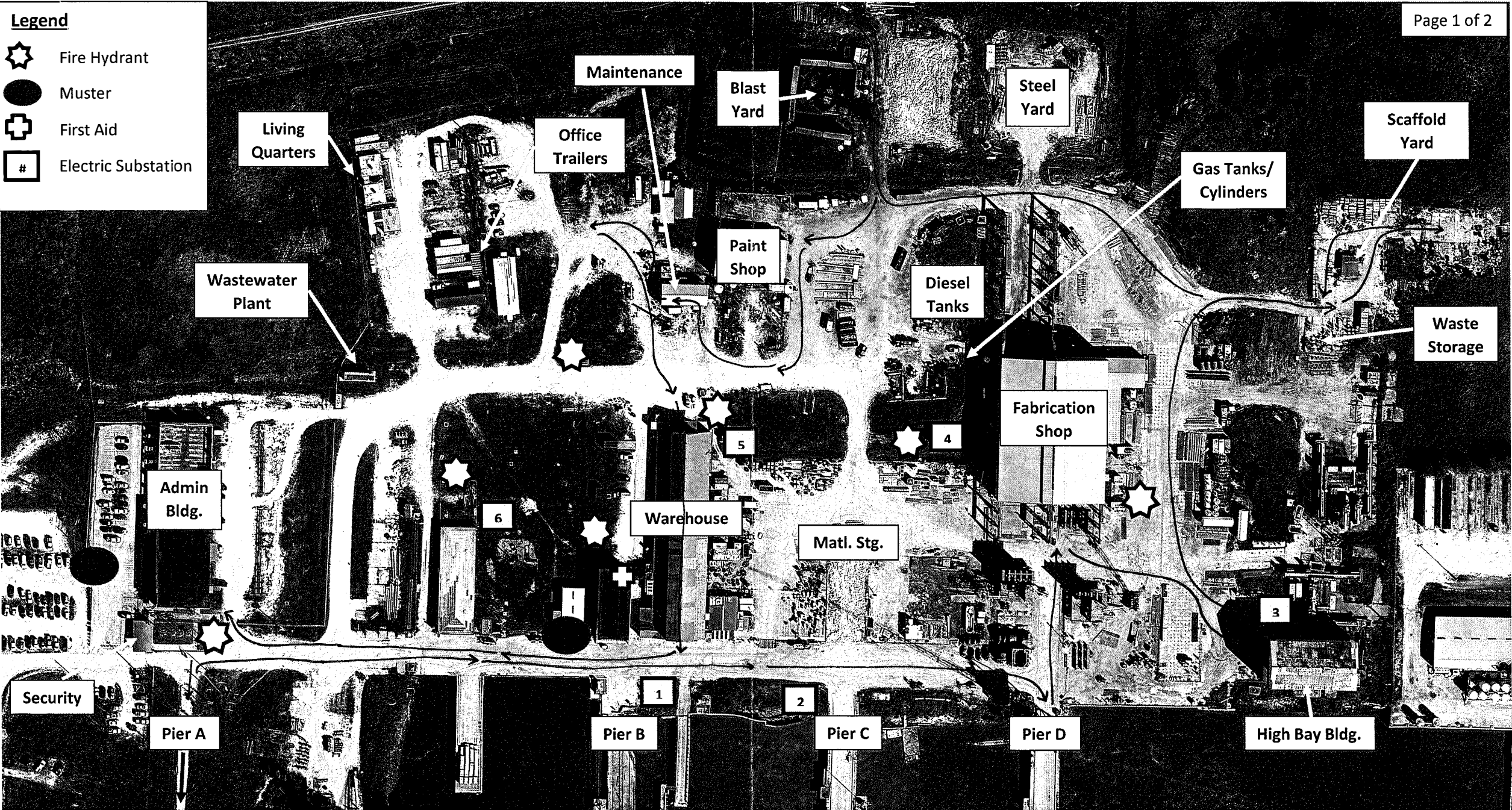


Photo File Name: GC_10.jpg	Date of Photo: 12/08/2022	Time: ~1150 hrs
Photographer: Mike Haughton, Gulf Copper		
Witness: Debra Pandak, EPA Inspector		
Description: View inside the paint area of the crushing machine, which crushes cans and drums once empty of paint.		

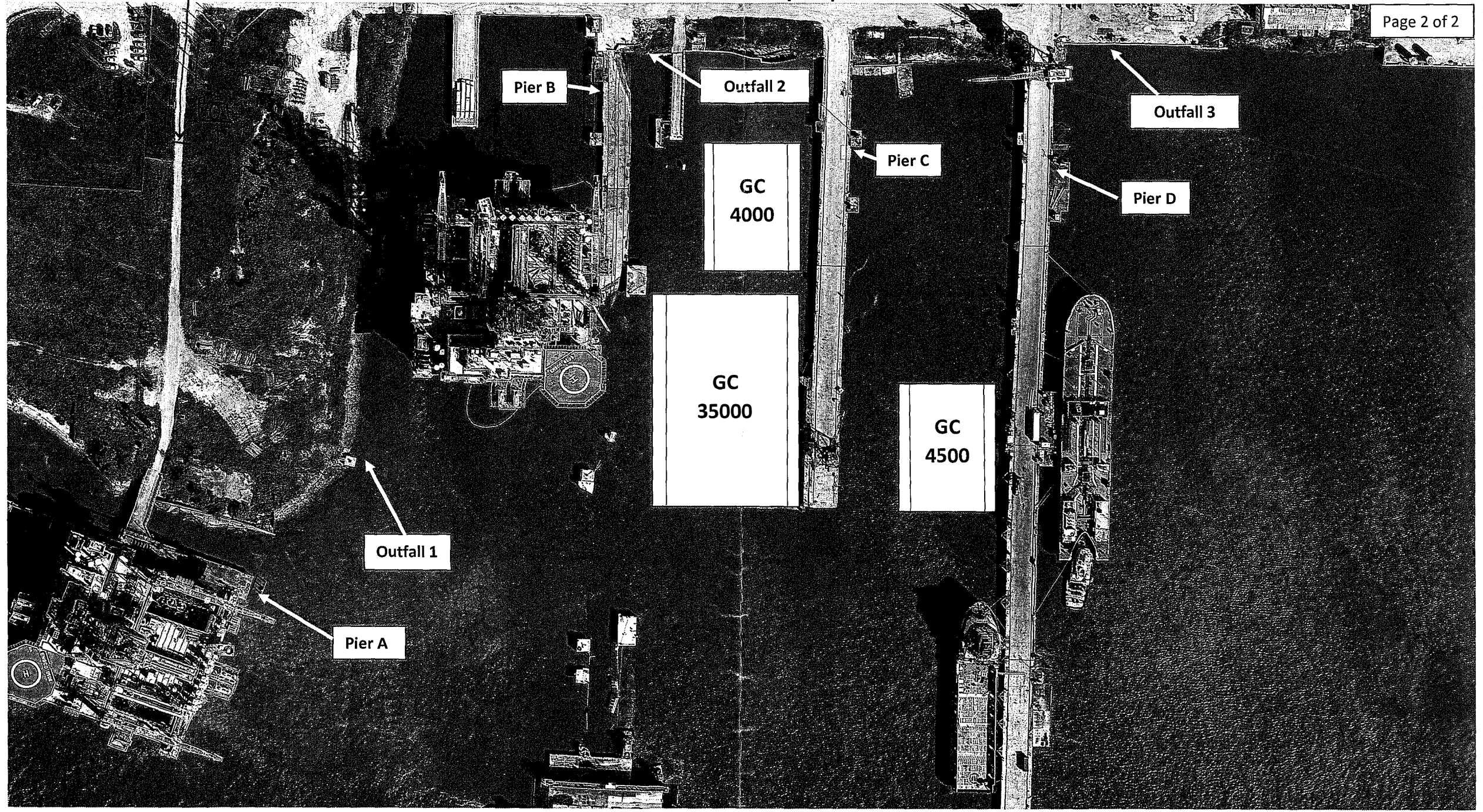
Appendix 2

Facility Map

Galveston Facility Map



Galveston Facility Map



Appendix 3

Daily Summary

Young-Dahl, Erin

From: Young-Dahl, Erin
Sent: Thursday, December 8, 2022 9:02 PM
To: mhaughton@gulfcopper.com
Cc: Pandak, Debra; Mansfield, William; Gardner, Dedriel
Subject: RCRA Inspection at Gulf Copper: Summary 12-8-22
Attachments: cbi form RCRA 2-19-20.pdf

Dear Mr. Haughton,

Thank you again for taking the time to show us around the Gulf Copper facility today. Here is a brief summary of our areas of concern and a couple of follow-up items. I have also attached a Confidential Business Information form in case Gulf Copper wishes to claim any information it provides to the EPA as CBI. I will also be sending out an invitation to access the inspection OneDrive folder; please let me know if this format of document exchange will not work for you!

EPA toured the facility from 10:15 am until approximately 12:45 pm. We saw the "Main Street" area, Fabrication Shop ("Fab Shop"), High Bay Building, Scaffold Area/Waste Storage Area, Blast Area, Paint Area, Maintenance Shop, and Warehouse. Our preliminary concerns are as follows:

- We saw unlabeled drums in the Waste Storage Area, including a black drum in poor condition by the shipping container and a white pony drum near the tarped scaffold in the middle of the gravel area that appeared to be leaking a fluid and leaving a solid residue. There were also multiple containers in the main storage area that had no waste labels on them.
- If paint waste is being managed as universal waste, the labels on the containers were not marked "Universal Waste – Paint and Paint-Related Waste" (Texas regulation: 30 TAC 335.262(c)(2)(F)).
- We saw multiple open, unlabeled containers housing unknown wastes. One container, the pony drum near the tarped scaffold in the scaffold area, appeared to be leaking. A drum in the main waste storage area was covered by a tarp and tied loosely with rope, but it did not have an attached drum lid beneath the tarp.
- In the waste storage area, we noticed multiple instances of waste stored in drums in poor condition (e.g., bulging drums, heavily corroded).

In addition to these areas of concern, we would like the following information:

- Please be sure to include an SDS for the leaking pony drum as part of the document request.
- What is the process for managing drums in the paint area? Please outline what happens to the drum from the time it begins receiving paint waste until it is crushed in the drum crusher. Additionally, are drums the only materials that are crushed in the crusher? Or do paint cans get crushed in this manner, too?

If you could please provide this clarification as well as the items on the document request list we gave you this afternoon by January 6, that would be great. If you have any additions or clarifications you would like to add to this summary, please let me know!

Thank you again for your time and patience,

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Erin Young-Dahl

She/her/hers

Physical Scientist

RCRA Enforcement Section

U.S. Environmental Protection Agency, Region 6

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