

MEMORANDUM

SUBJECT: Region 6 RCRA Inspector Participation in a US Coast Guard Multi-Agency Strike Force Operation (MASFO)

FROM: Dedriel Gardner, Environmental Engineer, ECDSR
Joyce Johnson, RCRA Inspector, ECDSR

THRU: Debra Pandak, Supervisor, ECDSR

TO: File

On April 1, 2024, Joyce Johnson and I (two Region 6 RCRA hazardous waste inspectors) participated in a Multi-Agency Strike Force Operation (MASFO) surge enforcement activity involving multiple agencies with varying jurisdictions, authorities and resources at the Port of Houston Barbour's Cut in La Porte, TX (see Appendix 1 for additional information). The US Coast Guard (USCG) invited the Enforcement and Compliance Assurance Division (R6 ECD) inspectors as a result of ongoing collaboration and participation in Region 6's Port Initiative (focuses on transporters that remove wastes from ships). The operation was to inspect approximately 200 containers, validating transportation worker identification credentials (TWICs) of drivers coming in and out of the Port and enforce regulation under the Federal Hazardous Materials Transportation Law and other applicable regulations. R6 ECD inspectors were to inspect for hazardous waste and Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) related regulatory requirements.

Ms. Johnson and I inspected for hazardous waste related regulatory requirements in addition to FIFRA requirements (hydrofluorocarbons and pesticides). Due to the R6 Port Initiative, we were stationed at the exit gate to determine if any containers removed from vessels contained any RCRA regulated wastes.

The USCG reported they had a successful operation with the following stats (see Appendix 2 for others):

- Over 60 participants, 9 agencies and no safety incidents
- 176 Containers Inspected
- 9 Detentions
- 55 TWIC Inspections

We did not encounter any containers of RCRA wastes or FIFRA products. Even so, we were able to observe the Department of Transportation (DOT) and USCG inspect for applicable container shipping regulatory requirements for hazardous material products including container condition and shipping papers. The RCRA regulations reference DOT regulations for RCRA wastes being shipped, but as stated above, no waste shipments were observed.

Appendixes

1. MASFO Invitation Letter
2. USCG Debriefing Summary

APPENDIX 1

U.S. Department of
Homeland Security

United States
Coast Guard



Coast Guard Captain of the Port
Houston-Galveston

13411 Hillard St
Houston TX 77034-5635
Staff Symbol: spf
Phone: 281.464.4767
Email: HoustonFAC@uscg.mil

16611
February 27, 2024

Dear Port Partners,

I cordially invite you and other representatives from your agency to participate in the U. S. Coast Guard-coordinated 2024 Multi-Agency Strike Force Operation (MASFO). The 2024 MASFO is scheduled for Monday, April 01, 2024, at the Port of Houston Authority Barbour's Cut Terminal. The purpose of a MASFO is to provide a surge enforcement activity involving multiple agencies with varying jurisdictions, authorities, and resources. For more information, refer to the U. S. Coast Guard National Container Inspection Program Manual, Commandant Instruction M16616.11D.

Our areas of focus will be inspecting intermodal containers for compliance with the hazardous materials transportation regulations (Title 49, Code of Federal Regulations and The International Maritime Dangerous Goods Code), verifying compliance with Transportation Worker Identification Credentials (TWIC) requirements, and law enforcement vehicle checks. We anticipate several teams inspecting a combination of import and export cargos inside the targeted facility, focusing primarily on declared hazardous material shipments but also including general cargo and container structural components. Additionally, we anticipate a simultaneous law enforcement operation using our respective organizations' resources, to include canine teams, radiation detection equipment, and other capabilities you can bring to the operation. Our goal is to improve compliance at State and Federal levels as well as provide a robust training environment to share our authorities, tools, and skills. We are hopeful that this can be a maximum participation event that will reflect positively on each organization and reinforce our partnership in performing our safety, security, and environmental stewardship missions.

To prepare for the MASFO, we are hosting a planning meeting on Monday, March 04, 2024. The meeting will be held at the U. S. Coast Guard Sector Houston-Galveston Office, located at 13411 Hillard Street Houston, TX 77034. The meeting will start promptly at 9:00 A.M in the Sector's 2nd floor conference room. If you wish to attend, please respond to Sector Houston-Galveston's Facility Inspection Branch via email at HoustonFAC@uscg.mil or via phone at 281-464-4767.

Sincerely,

A handwritten signature in blue ink, appearing to read "Corrina Ott", with a circled "TX, CDR" written next to it.

CORRINA OTT

Commander, U. S. Coast Guard
Chief, Inspections Division
By direction

APPENDIX 2

Gardner, Dedriel

From: Hadley, Laura A PO1 USCG SEC HOU/GAL (USA) <Laura.A.Hadley@uscg.mil>
Sent: Friday, April 5, 2024 1:34 PM
To: Perkins, Athena; BAGGERLY, BRIGID; Kinzig, Mamie K (Supv. Special Agent); Knight, Tatiana; Hill, Richard; Hill, Carrie A (Special Agent); Jones, Ronald; rodolfo.servin@dot.gov; perla.muniz@dot.gov; efrain.del.toro@dot.gov; jacob.trevino@dot.gov; ramon.maldonado@dot.gov; djefferson@porthouston.com; john.okeeffe@dot.gov; rodney.williams@dot.gov; fullbrightf@laportetx.gov; pinonl@laportetx.gov; BERNAL, ENRICO; roy.gonzales@dot.gov; michael.horton@txdot.gov; zachary.munoz@dhs.tsa.gov; leslie.calhoun@dot.gov; jimmie.perkins@dot.gov; patrick.karabanoff@dot.gov; Gardner, Dedriel; Johnson, Joyce-R6; CAIN, RUSSELL T; YOUNG, RODERICK; eric.w.ilshner@cbp.dhs.gov; Thomas, Ryan; hensonj@laportetx.gov; salterb@laportetx.gov; BURKE, CHRISTOPHER J; D08-SMB-SecHouston-HoustonFAC
Cc: Morrison, Don P LT USCG SEC HOU/GAL (USA); Ott, Corrina CDR USCG SEC HOU/GAL (USA); Morgans, Joseph W CDR USCG (USA)
Subject: 2024 USCG MASFO Debrief
Attachments: IMG_1654.jpg; USCG 2024 MASFO Fools Day Operation.pdf
Signed By: laura.a.hadley@uscg.mil

Happy Friday!!

Thank you everyone who participated in the MASFO, Even though the morning was slow, we had a successful operation with over 60 participants, 9 agencies and 00 safety incidents.

Please use this google link to share any pictures that you have or grab any pictures we uploaded.

https://drive.google.com/drive/folders/1NA19r5riqnMyPDu_o35lhXnW_4vRVI5T

Very Respectfully
MST1 Laura Hadley
Sector Houston/Galveston
Waterfront Facilities
281-464-4767

USCG 2024

OPERATION MASFOOLS DAY

USCG

176 Containers Inspected

9 Detentions

55 TWIC Inspections

FEDERAL MOTOR CARRIERS

11 Commercial Motor Vehicle (CMV) Inspections performed.

9 violations discovered of which 4 resulted in either the truck tractor or trailer being placed out-of service. One CMV combination was towed from the port.

179 Chassis were checked through the GEIR Registry.

US CUSTOMS AND BORDER PROTECTION

84 container inspections with multiple DOT citations

95 container inspections, 1 TWIC card revocation (criminal history after issuance), 2 arrests, 3 firearm verifications.

TSA

156 TWIC Inspections

FEDERAL RAILROAD ADMINISTRATION

01 portable tank placed on hold

