

Region 6 - Enforcement & Compliance Assurance Division
INSPECTION REPORT

Inspection Date(s):	03/02/2026	
Media Program:	Waste	
Regulatory Program(s)	RCRA	
Company Name:	Cotac	
Facility Name:	Cotac	
Facility Physical Location:	9938 Chemical Rd	
(city, state, zip code)	Pasadena, TX, 77507	
Mailing address:	Same	
(city, state, zip code)	Same	
County/Parish:	Harris	
Facility Phone Number	281-727-3730	
Facility Contact:	Jesse Gomez	Site Manager
	Jesse.gomez@Cotac-group.com	
FRS Number:	110001870850	
Identification/Permit Number:	TX0000103804	
Media Identifier Number:	TCEQ SWR # 82559	
NAICS:	488510	
SIC:	None	
Personnel participating in inspection:		
Bill Mansfield	EPA	Inspector
Jesse Gomez	Cotac	Site Manager
Coby Brown	Cotac	SHEQ
Chuck Hargraves	Cotac	Cleaning Manager
EPA Lead Inspector Signature/Date	WILLIAM MANSFIELD Digitally signed by WILLIAM MANSFIELD Date: 2026.04.14 08:37:13 -05'00'	
	Bill Mansfield	Date
Supervisor Signature/Date	DEBRA PANDAK Digitally signed by DEBRA PANDAK Date: 2026.04.14 10:58:23 -05'00'	
	Debra Pandak	Date

Section I – INTRODUCTION

PURPOSE OF THE INSPECTION

I, Bill Mansfield, an EPA Region 6 inspector, arrived at the Cotac facility at 1:57PM on 03/02/2026 for an announced inspection. I met Jesse Gomez, Site Manager; Coby Brown, SHEQ and Chuck Hargraves, Cleaning Manager. I presented my credentials to Jesse Gomez and informed him that this was an EPA inspection to determine the facility's compliance with the Resource Conservation and Recovery Act (RCRA). The scope of the inspection is a Compliance Evaluation Inspection (CEI) and includes an evaluation of the facility's hazardous waste management activities.

FACILITY DESCRIPTION

Cotac is a product storage, trailer maintenance, and tank/equipment cleaning facility. The facility operates from 6 a.m.- 6 p.m. Monday through Saturday.

The facility is registered as a Large Quantity Generator (LQG) of hazardous waste.

Section II – OBSERVATIONS

During the opening conference, I provided the facility representatives with the US EPA Small Business Resources Information Sheet and the Notice Regarding Proprietary/Confidential Business Information form.

Container and Trailer Maintenance Building:

I observed a used oil container labeled with the words used oil (Appendix 1, Photo 2). I also observed two cut-down poly drums being used as drip pans for used oil servicing (Appendix 1, Photo 3).

Tank Wash and Wastewater area:

The tank wash and wastewater area consists of eleven (11) wash bays and the wastewater treatment system. Per the cleaning manager, the tank wash at Cotac only washes containers that previously held product and that washing of the containers (tanker trucks) is done after small amounts of product heels are removed. Per the cleaning manager, most of the washing is done with hot water. If additional washing is necessary, the facility will use diesel fuel, then caustic, then additional hot water. I observed wash water being drained from the tanker truck containers into the floor drains of the tank wash area. Per the cleaning manager, the floor drains will drain into a sump that is pumped into a large above ground storage tank (AST) (Appendix 1, Photo 16). Wastewater in the AST is run through an oil water separator. Oil removed from the oil water separator goes into totes and is recycled. Water removed from the oil water separator is sent to a sump at the front of the facility and piped directly to Gulf Coast Authority (GCA). In the tank wash area, I observed wash bays 1-5 (Appendix 1, Photos 4 and 6) and

wash bays 6-11 (Appendix 1, Photos 5 and 14). I observed wash water on the floor (Appendix 1, Photo 12) of the wash bays and in wash bay 6 the cleaning manager used pH paper to sample the wash water on the floor and the pH paper showed a pH around 7 (Appendix 1, Photo 13). I also observed the storage containers for diesel and caustic that are used in the wash bays (Appendix 1, Photo 14).

Centralized Accumulation Area (CAA):

I observed several containers of hazardous waste in the CAA (Appendix 1, Photo 7). The hazardous waste in the containers was generated from heels removed from containers prior to cleaning. I observed 3 drums of hazardous waste not labeled with the words "Hazardous Waste", or an indication of the hazards of the contents (Appendix 1, Photos 8, 9, and 11). I observed one drum of hazardous waste not labeled with an indication of the hazards of the contents (Appendix 1, Photo 10).

Truck Maintenance Building:

In the truck maintenance building, I observed a solvent wash station (Appendix 1, Photo 15).

Section III – AREAS OF CONCERN

The closing meeting was attended by me, Bill Mansfield (EPA Inspector), and facility representatives Coby Brown, SHEQ and Chuck Hargraves, Cleaning Manager.

I discussed the following Area of Concern (AOC) with them:

- AOC 1 - Drums of hazardous waste in the CAA were not labeled with the words "Hazardous Waste" and/or an indication of the hazards of the contents per requirements of conditions of exemption for LQGs in 40 C.F.R. § 262.17.

I fielded questions from facility personnel and provided information about the next steps in the inspection process.

Section IV – FOLLOW UP

I requested the following documents from the facility:

- Personnel training and position descriptions for five staff.
- Last six months of hazardous waste manifests.
- Contingency plan and emergency procedures.
- Hazardous waste determinations for all waste streams.
- Permits (CWA and RCRA).

EPA is awaiting this additional information from the facility.

Section V – LIST OF APPENDICES

Appendix 1 – Photo Log – 16 photos taken 3/2/26

Appendix 1

Photograph Log



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 1

Photo No: 1

Facility/Location:		Cotac					
City:	Pasadena	County:	Harris	State:	TX	Direction:	W
Filename:	TWC_0839.JPG	Photo Date:		03/02/2026		Time:	15:54:43
Photographer:	Bill Mansfield			Witness Name:		NA	



Description:	Front of facility.		



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 2

Facility/Location:		Cotac					
City:	Pasadena	County:	Harris	State:	TX	Direction:	W
Filename:	TWC_0840.JPG	Photo Date:		03/02/2026		Time:	15:17:48
Photographer:	Bill Mansfield			Witness Name:		NA	



Description:	Used oil container in maintenance building labeled with the words used oil.		



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 3

Facility/Location:	Cotac						
City:	Pasadena	County:	Harris	State:	TX	Direction:	W
Filename:	TWC_0841.JPG	Photo Date:	03/02/2026		Time:	16:03:24	
Photographer:	Bill Mansfield			Witness Name:	NA		



Description:	Used oil drip pans.		



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 4

Facility/Location:	Cotac						
City:	Pasadena	County:	Harris	State:	TX	Direction:	NW
Filename:	TWC_0842.JPG	Photo Date:	03/02/2026		Time:	15:35:34	
Photographer:	Bill Mansfield			Witness Name:	NA		



Description:	Tank wash bays 1-5.		



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 5

Facility/Location:	Cotac						
City:	Pasadena	County:	Harris	State:	TX	Direction:	NW
Filename:	TWC_0843.JPG	Photo Date:	03/02/2026		Time:	15:30:26	
Photographer:	Bill Mansfield			Witness Name:	NA		



Description:	Tank wash bays 6-11.		



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 6

Facility/Location:	Cotac						
City:	Pasadena	County:	Harris	State:	TX	Direction:	SW
Filename:	TWC_0844.JPG	Photo Date:	03/02/2026		Time:	15:54:04	
Photographer:	Bill Mansfield			Witness Name:	NA		



Description:	Tank wash bays 1-5 other side.		



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 7

Facility/Location:	Cotac						
City:	Pasadena	County:	Harris	State:	TX	Direction:	S
Filename:	TWC_0845.JPG	Photo Date:	03/02/2026		Time:	15:28:52	
Photographer:	Bill Mansfield			Witness Name:	NA		



Description:	Centralized accumulation area (CAA).		

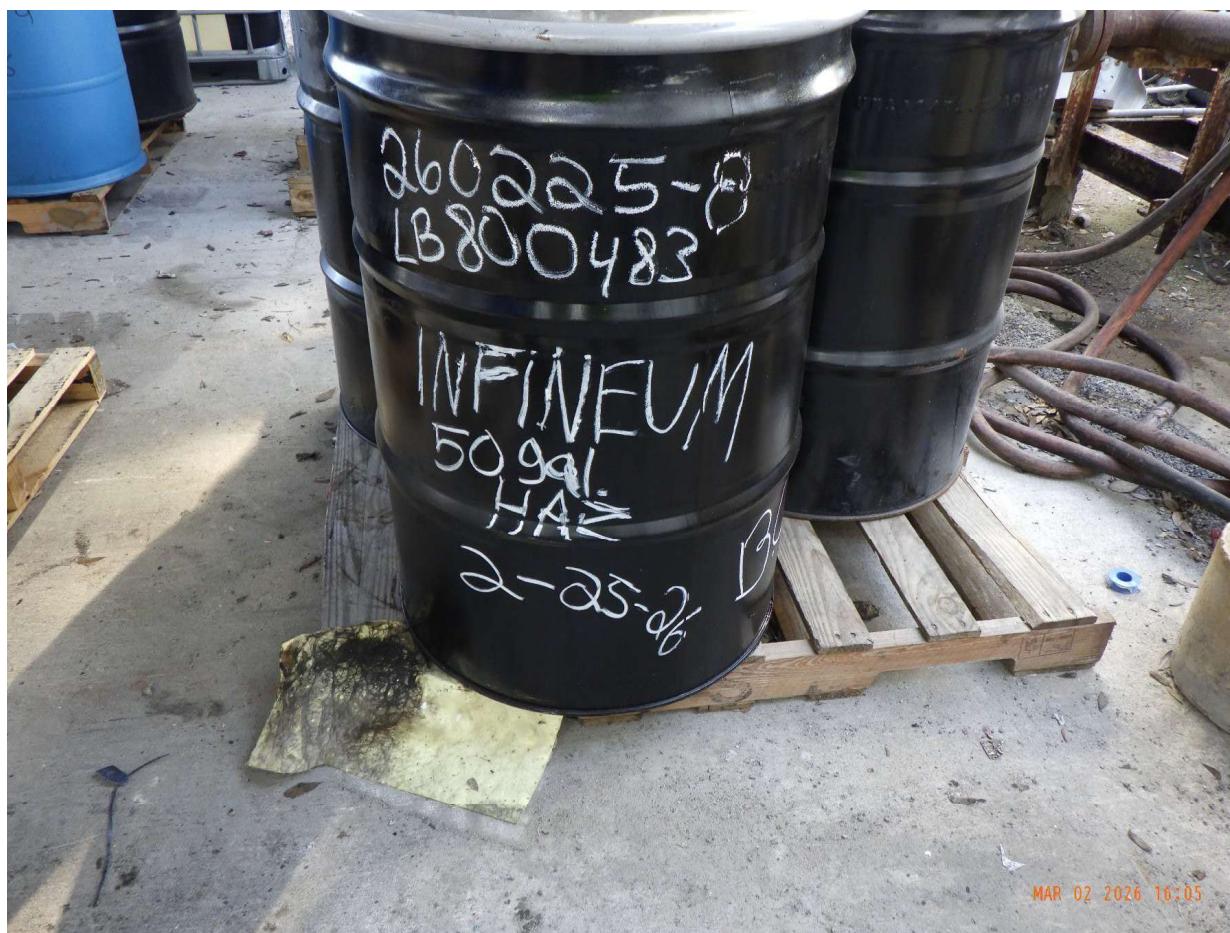


UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 8

Facility/Location:		Cotac					
City:	Pasadena	County:	Harris	State:	TX	Direction:	E
Filename:	TWC_0846.JPG	Photo Date:		03/02/2026		Time:	16:07:38
Photographer:	Bill Mansfield			Witness Name:		NA	



Description:	Drum of hazardous waste not labeled with the words "Hazardous Waste" or an indication of the hazards of the contents.		



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 9

Facility/Location:		Cotac					
City:	Pasadena	County:	Harris	State:	TX	Direction:	N
Filename:	TWC_0847.JPG	Photo Date:		03/02/2026		Time:	16:05:14
Photographer:	Bill Mansfield			Witness Name:		NA	



Description:	Drum of hazardous waste not labeled with the words "Hazardous Waste" or an indication of the hazards of the contents.		

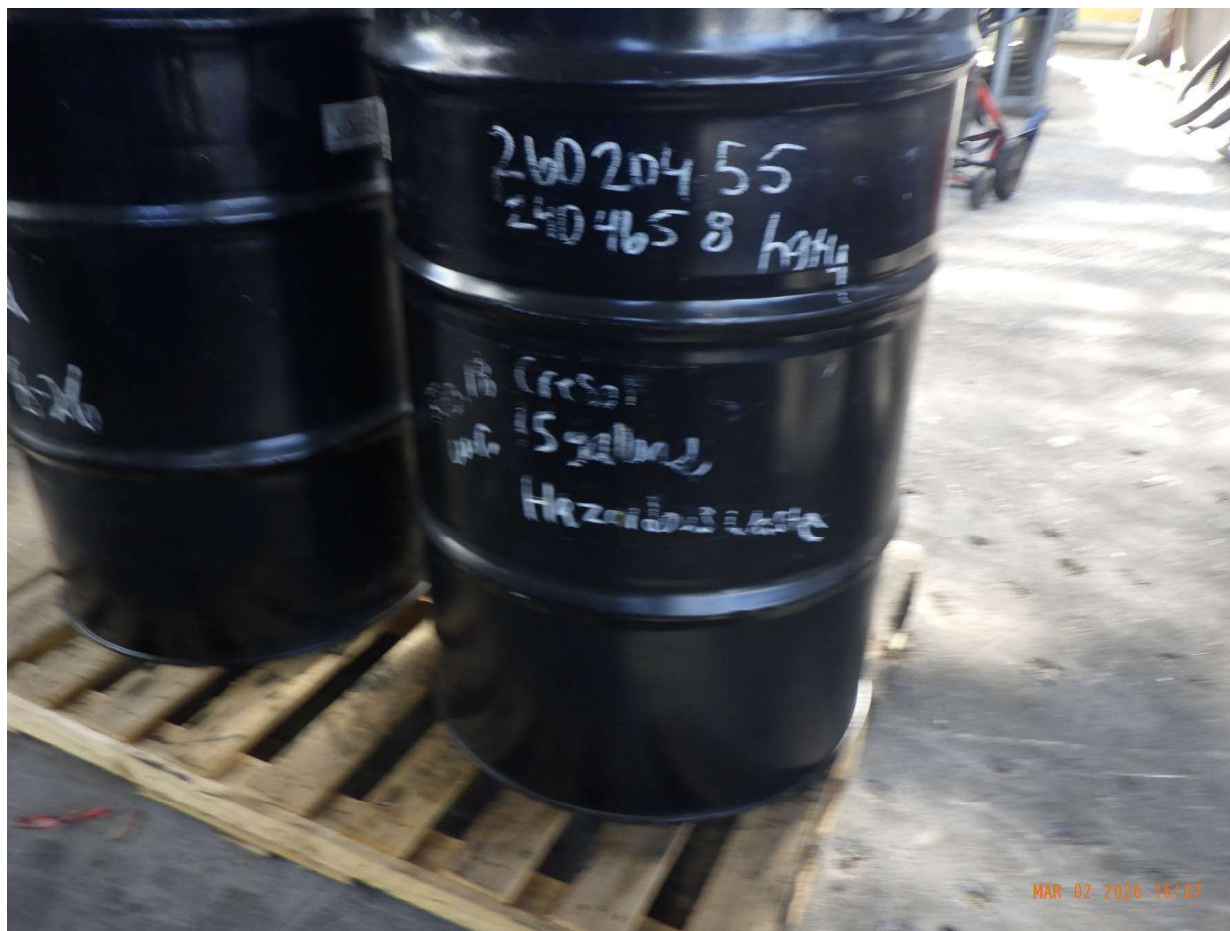


UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 10

Facility/Location:		Cotac					
City:	Pasadena	County:	Harris	State:	TX	Direction:	W
Filename:	TWC_0848.JPG	Photo Date:		03/02/2026		Time:	16:07:50
Photographer:	Bill Mansfield			Witness Name:		NA	



Description:	Drum of hazardous waste not labeled with an indication of the hazards of the contents.		

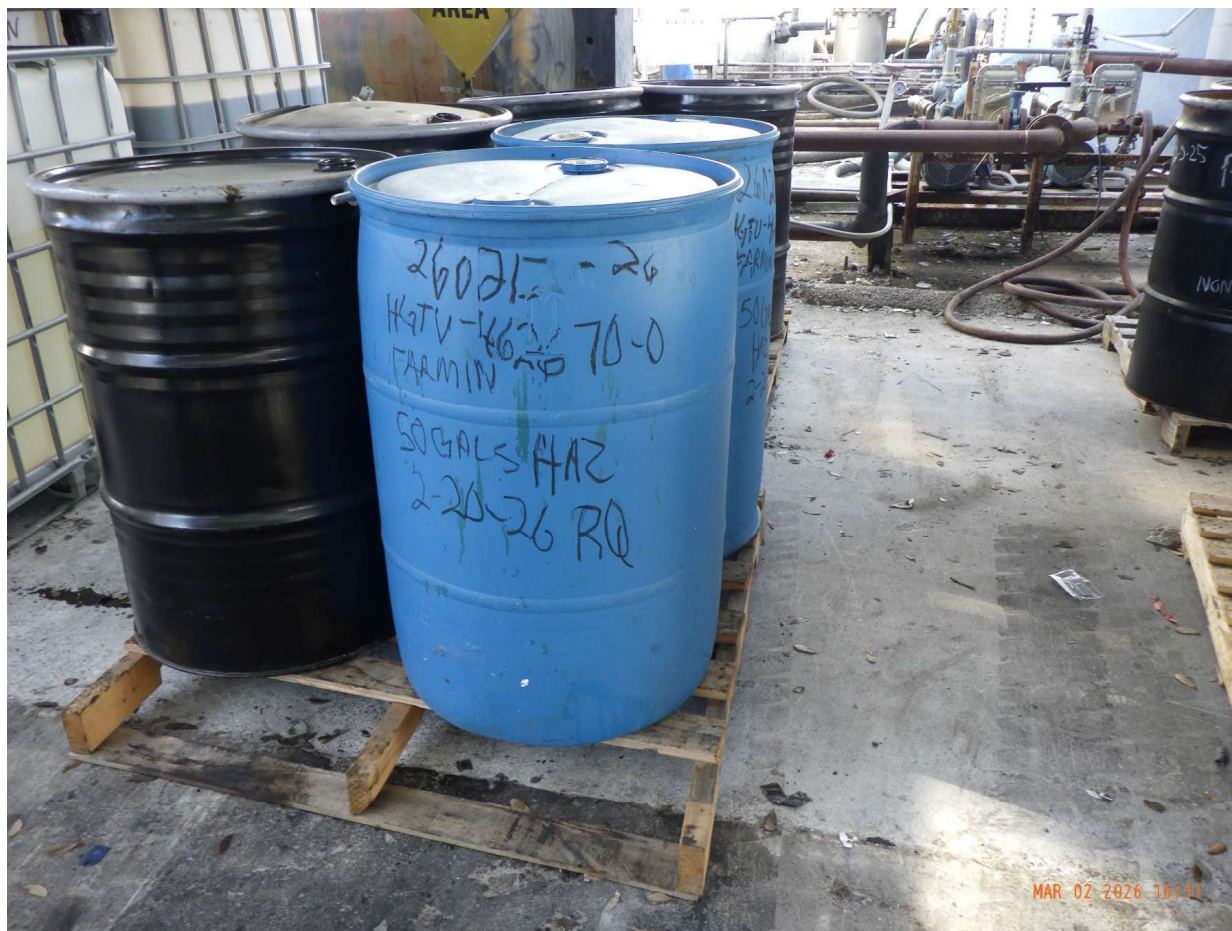


UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 11

Facility/Location:	Cotac						
City:	Pasadena	County:	Harris	State:	TX	Direction:	S
Filename:	TWC_0849.JPG	Photo Date:	03/02/2026		Time:	16:25:21	
Photographer:	Bill Mansfield			Witness Name:	NA		



Description:	Drum not labeled with the words "Hazardous Waste" or an indication of the hazards of the contents.		



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 12

Facility/Location:	Cotac						
City:	Pasadena	County:	Harris	State:	TX	Direction:	NW
Filename:	TWC_0850.JPG	Photo Date:	03/02/2026		Time:	16:35:49	
Photographer:	Bill Mansfield			Witness Name:	NA		



Description:	Container being washed.		



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 13

Facility/Location:		Cotac					
City:	Pasadena	County:	Harris	State:	TX	Direction:	N
Filename:	TWC_0851.JPG	Photo Date:		03/02/2026		Time:	17:01:24
Photographer:	Bill Mansfield			Witness Name:		NA	



Description:	pH paper after testing the water on the floor in wash bay 6. It was neutral.		

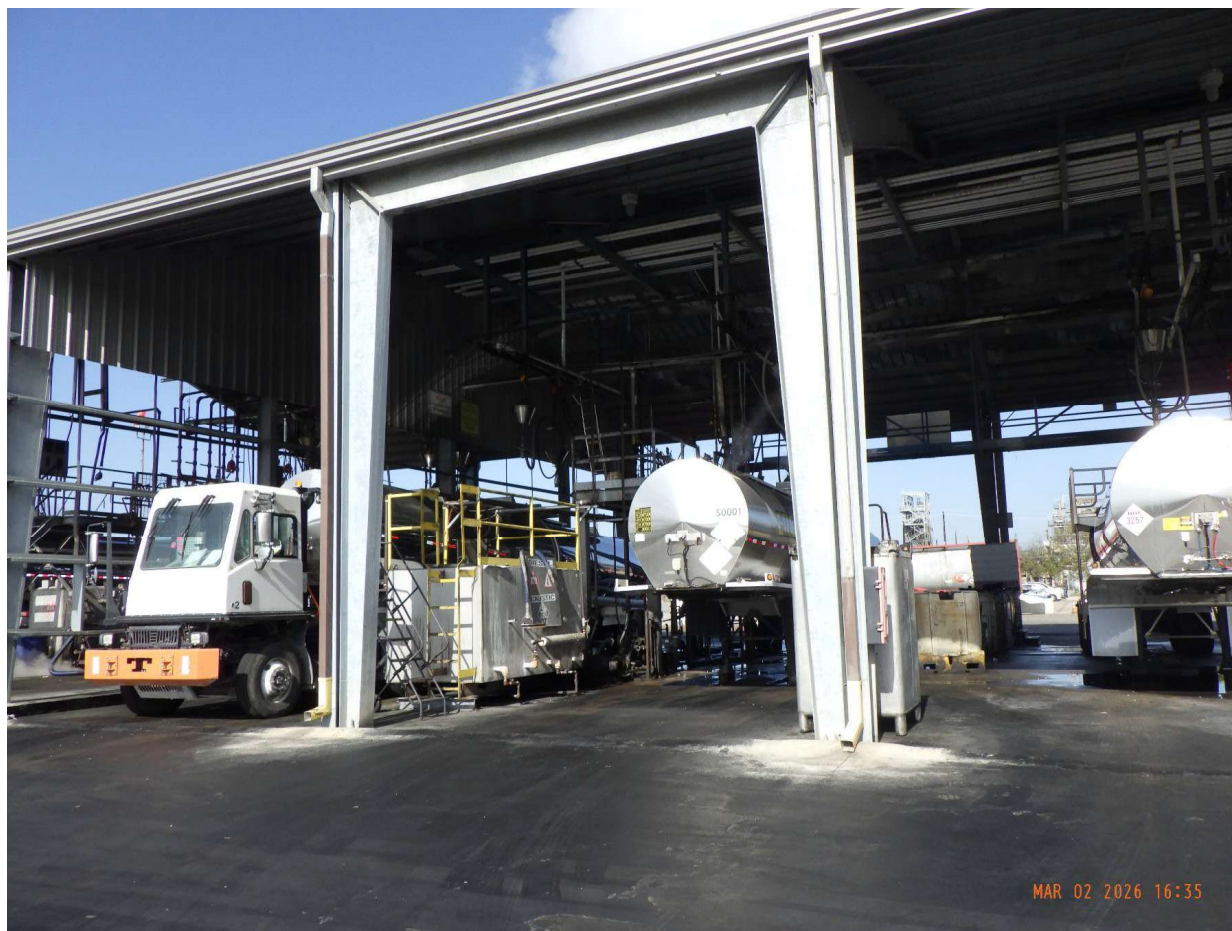


UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 14

Facility/Location:	Cotac						
City:	Pasadena	County:	Harris	State:	TX	Direction:	E
Filename:	TWC_0852.JPG	Photo Date:	03/02/2026		Time:	16:11:19	
Photographer:	Bill Mansfield			Witness Name:	NA		



Description:	Photo shows diesel and caustic wash containers in bay 8.		

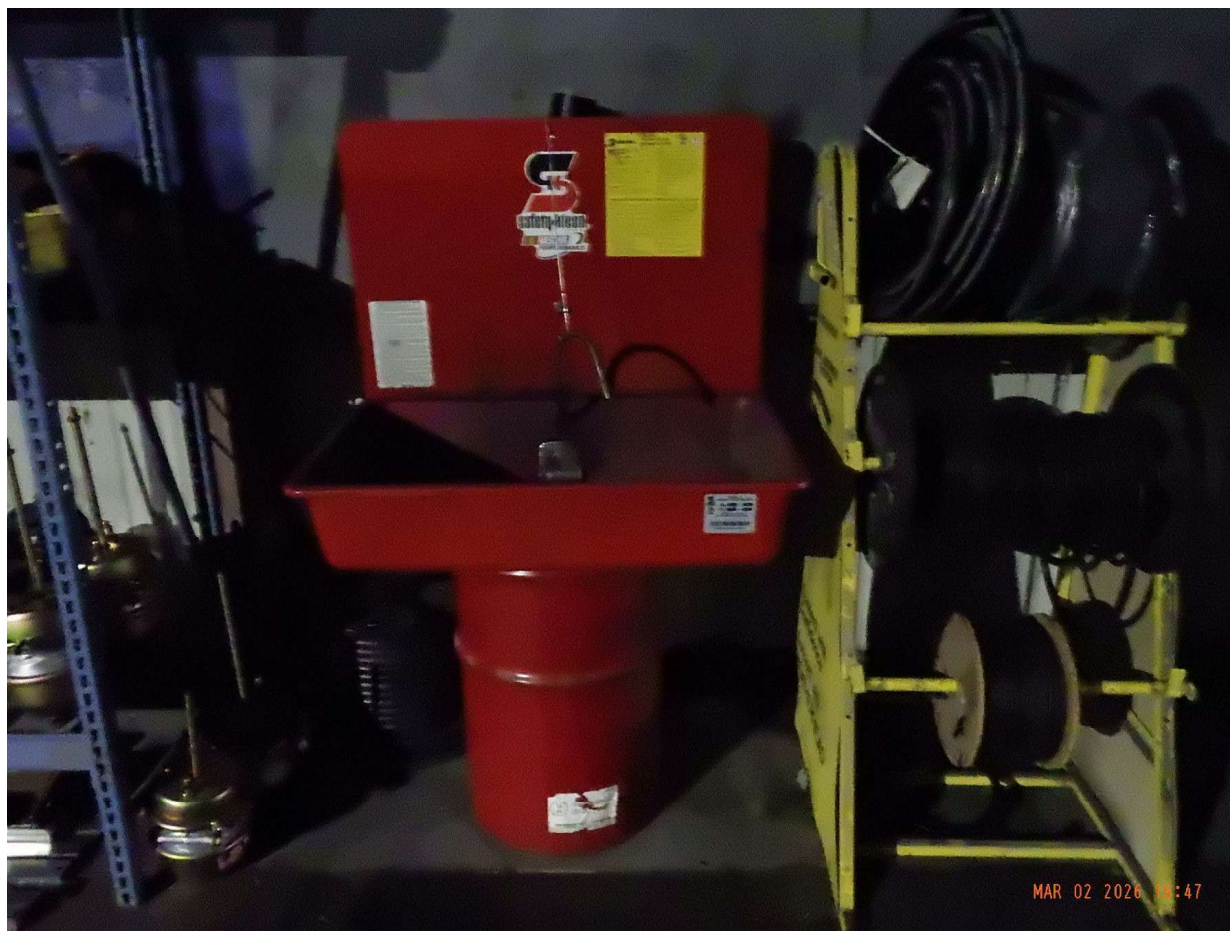


UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 15

Facility/Location:		Cotac					
City:	Pasadena	County:	Harris	State:	TX	Direction:	
Filename:	TWC_0853.JPG	Photo Date:		03/02/2026		Time:	16:25:30
Photographer:	Bill Mansfield			Witness Name:		NA	



Description:	Solvent Wash Station.		



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 16

Facility/Location:	Cotac						
City:	Pasadena	County:	Harris	State:	TX	Direction:	NW
Filename:	TWC_0854.JPG	Photo Date:	03/02/2026		Time:	16:47:25	
Photographer:	Bill Mansfield			Witness Name:	NA		



Description:	Overview of wastewater tank, dewatering container, and oil water separator.		