



REGION 6

DALLAS, TX 75270

2/25/2025

SENT BY ELECTRONIC MAIL

Compliance@natureenviro.com

Nona Walker
18511 Beaumont Hwy
Houston, TX 77049

Re: Notice Letter
Resource Conservation and Recovery Act
Nature Environmental and Marine Services (TXR000084819)

Dear Ms. Walker:

Hazardous waste that is improperly managed poses a serious threat to human health and the environment. Through implementation of the authorities in the Resource Conservation and Recovery Act (RCRA), 42 U.S.C. §§ 6901 – 6992k, the United States Environmental Protection Agency (EPA) regulates the control of hazardous waste from the “cradle-to-grave.” This includes the generation, transportation, treatment, storage and disposal of hazardous waste.

On May 6, 2024, EPA, Region 6 conducted an inspection of Nature Environmental and Marine Services’ facility located in Houston, TX. The purpose of the inspection was to determine Nature Environmental and Marine Services’ compliance with the requirements of RCRA, and the implementing regulations. The information currently available to EPA, collected as a result of the inspection, suggests that Nature Environmental and Marine Services may be in violation of RCRA.

RCRA Violations

By this letter, EPA is extending Nature Environmental and Marine Services the opportunity to advise EPA, via a conference call, or in writing, of any further information EPA should consider with respect to the following potential violations of RCRA and the implementing regulations:

1. Failure to meet RCRA notification requirements pursuant to Section 3010(a) of RCRA and 42 U.S.C. 6930(a).
2. Failure to contain universal waste lamps in in closed containers or packages pursuant to 40 C.F.R. § 273.13(d)(1).

3. Failure to label or clearly mark universal wastes pursuant to 40 C.F.R. § 273.14.
4. Failure to keep containers and aboveground tanks used to store used oil in good condition pursuant to 40 C.F.R. § 279.45(c)(1) and 40 C.F.R. § 279.54(b)(1).
5. Failure to equip containers of used oil with a secondary containment system that is sufficiently impervious to used oil to prevent any used oil released into the containment system from migrating out of the system to the soil, groundwater, or surface water pursuant to 40 C.F.R. § 279.45(d)(2) and 40 C.F.R. § 279.54(e)(2).
6. Failure to label or clearly mark containers and aboveground tanks used to store used oil with the words "Used Oil" pursuant to 40 C.F.R. § 279.45(g)(1) and 40 C.F.R. § 279.54(f)(1).
7. Failure to maintain a copy of the contingency plan at the facility pursuant to 40 C.F.R. § 279.52(b)(3)(i).
8. Failure to amend the Spill Prevention, Control, and Countermeasures Plan when there is a change in the facility design, construction, operation, or maintenance that materially affects its potential for a discharge pursuant to 40 C.F.R. § 112.5(a).

Please review the additional information we have provided in the Enclosure.

Opportunity to Confer

This Notice provides you with the opportunity to confer with EPA within **10 business days** of receipt of this Notice. We request Nature Environmental and Marine Services contact Christyn Cavazos, with the Office of Regional Counsel, at Cavazos.Christyn or 214-665-6470.

Sincerely,

Jeff Yurk
Manager
Waste and Chemical Enforcement Branch

Enclosure: Additional Sources of Information

cc: madelyn.flannagan@tceq.texas.gov
john.shelton@tceq.texas.gov

ADDITIONAL SOURCES OF INFORMATION

- Information on RCRA and hazardous waste regulations
<https://www.epa.gov/rcra/resource-conservation-and-recovery-act-rcra-regulations>
- RCRA Civil Penalty Policy
<https://www.epa.gov/enforcement/resource-conservation-and-recovery-act-rcra-civil-penalty-policy>
- Consolidated Rules of Practice Governing the Administrative Assessment of Civil Penalties, 40 C.F.R. Part 22
https://www.epa.gov/sites/production/files/2013-10/documents/final-crop-fr_1.pdf
- Small Business Fact Sheet
www.epa.gov/compliance/small-business-resources-information-sheet