

INSPECTION REPORT

Inspection Entry Date/Time	11/4/2024 9:42 (CT)			Announced: No (tenants and related facilities)
Inspection Exit Date/Time	11/4/2024 10:55 (CT)			Access: Granted
Regulatory Program	RCRA			
Type of Inspection	Focused Compliance Inspection (FCI)			
Facility or Site Name	P.C. Pfeiffer Co., Inc.			
Facility/Site Identifier	N/A			
Facility/Site Physical Address	1255 Main St.			
City, State, Zip Code	Beaumont, TX 77701			
County/Borough	Jefferson County			
Generator Status	Non-generator			
NAICS	488320			
Type of Operation	P.C. Pfeiffer offloads cargo from vessels and loads it onto trucks and railcars for delivery			
Geographic Coordinates	30.079435, -94.09214			
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
P.C. Pfeiffer, Co., Inc.	Chris Gobert	(409) 299-7097	ChrisG@PCPfeifferco.com	Yes	Yes

Facility General Description

Tenant/Area	Inspection Date	Process Description	Area of Concern
P.C. Pfeiffer Co., Inc.	11/04/2024	P.C. Pfeiffer (PCP) offloads cargo from vessels and loads it onto trucks and railcars for delivery. PCP is covered under the Port of Beaumont's MARPOL COA for Annexes I and V.	Yes

SECTION II – OBSERVATIONS

Tenant: P.C. Pfeiffer Co., Inc.			
Section: 2.1	Date: 11/04/24, 09:42 AM	Contains AOC: Yes	Contains CBI: No
Lead Inspector: Vince Damiano	Attendees: Chris Gobert (Superintendent)		
PCP is located within the Port of Beaumont and removes cargo from vessels and loads it onto railcars and trucks for delivery. Primarily, PCP handles pulp paper, project cargo, motors, steel, and rails. PCP stores the cargo in their warehouse before loading it for delivery. PCP uses its own equipment to move cargo which includes heavy-lift forklifts, small forklifts, and yard trucks. PCP generates used oil and oil filters from maintenance on its equipment which is picked up by Action Oil (TXR000085911) for recycling. PCP is covered under Port of Beaumont's MARPOL COA, but Mr. Gobert stated they do not remove trash or waste from vessels. PCP is not registered with the EPA and is considered a non-generator of hazardous waste. Following the opening conference, the inspection team conducted a visual inspection of PCP's maintenance area and fuel tank shed. The inspection team first entered the fuel shed where two fuel tanks were found: one 500-gallon tank contained unleaded gasoline and one 1000-gallon tank contained diesel fuel. Inside the fuel tank shed, the inspection team observed several containers and drums of material that appeared to be waste due to the condition of the containers. Mr. Gobert was unsure of the contents of the following containers found in the fuel shed: • Four 1-gallon containers were found on a shelf behind the fuel tanks which were one-quarter full to three-quarters full of material (see Appendix 1 – Photo 1). Mr. Gobert stated he believes the two blue 1-gallon containers are stencil dye, but they have not used that product in many years. • One half-full 5-gallon container which was unlabeled and appeared to contain oily liquid (see Appendix 1 – Photo 3). • Several 55-gallon drums were found in poor condition, three of which were storing material. The 55-gallon drum pictured in Photo 4 (one-quarter full), the red 55-gallon drum with the words waste oil pictured in Photo 5 (full), and the 55-gallon drum pictured in Photos 5-6 (full). Mr. Gobert stated these drums had been stored here since before his time at the facility and was unsure of their contents. • One 55-gallon drum that was half-full of material was found next to the fuel tanks (see Appendix 1 – Photo 9). The inspection team requested waste determinations on all of the drums and containers discussed above [AOC #1 – PCP did not make a waste determination – 40 CFR 262.11]. The inspection team also observed four			

discarded used oil filters in the fuel tank shed (see Appendix 1 – Photos 2 and 8). The filters were discarded for what appeared to be a long time and did not contain any free-flowing oil at the time of the inspection. Behind the fuel shed, the inspection team observed an oily sheen found accumulating on the water and concrete pad which shows evidence of an oil spill that was not properly managed (see Appendix 1 – Photos 10 to 11) [**AOC #2** – PCP did not respond to and properly manage a release of used oil – 40 CFR 279.22 (d)].

The inspection team moved into the maintenance area where PCP repairs their equipment. The inspection team observed several instances of used oil spills accumulating on the concrete floor throughout the maintenance area (see Appendix 1 – Photos 12 and 17 to 20) [see **AOC#2**]. PCP staff was actively cleaning up and containing used oil spills while the inspection team was conducting the visual inspection, as shown in Photo 12. Next, the inspection team observed PCP's used oil storage area found within the maintenance area. The inspection team observed one 500-gallon used oil container that was labeled "Used Oil." The container was closed and in good condition. PCP has three other 500-gallon containers that are no longer in use. On the ground of the used oil storage area, the inspection team observed six 5-gallon containers and one 10-gallon container storing used oil filters that still contained used oil (see Appendix 1 – Photos 12 to 14). Above the containers on the ground, there were several used oil filters draining into drip pads (see Appendix 1 – 15 and 16). Since the used oil filters were not drained by one of the methods in 40 CFR 261.4(b)(13), the used oil filters should be properly managed and labeled as "Used Oil" [**AOC #3**: PCP did not clearly label containers used to store used oil with the words "Used Oil." – 40 CFR 279.22 (c)(1)].

The inspection moved outside of the maintenance area where two 55-gallon drums were found storing liquid; both drums were approximately three-quarters full (see Appendix 1 – Photos 21 and 22). Mr. Gobert was uncertain about the contents of the two drums but guessed it may be rainwater. The inspection requested a waste determination (see **AOC#1**). The inspection team continued to conduct the visual inspection along the perimeter of the maintenance building and observed two discarded aerosol cans (see Appendix 1 – Photos 23 and 24). The aerosol cans were rusted and appeared to be left outside for some time.

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 their potential AOCs. A closing conference was conducted at approximately 11:00 AM with PCP personnel. The AOCs were communicated during the closing.

SECTION III – RECORDS REVIEW

No RCRA regulated records were reviewed during this focused onsite inspection besides those mentioned in Section II.

SECTION IV – AREA OF CONCERN

The presentation of Area(s) of Concern does not constitute a formal compliance determination or violation.

Tenant: P.C. Pfeiffer Co., Inc.		
AOC #1 – PCP did not make a waste determination.	Citation: 40 CFR 262.11	Section: 2.1
AOC #2 – PCP did not respond to and properly manage a release of used oil.	Citation: 40 CFR 279.22 (d)	Section: 2.1

AOC #3 – PCP 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
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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 the provision of documents requested.

SECTION VI – LIST OF APPENDICES

Appendix 1. Photograph Log

APPENDIX 1. PHOTOGRAPH LOG



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Location: P.C. Pfeiffer Co., Inc.		
City: Beaumont	County/Parish: Jefferson	State: Texas



Photo No. 1

Photo File Name: DSCN7620

Date of Photo: 11/04/2024

Time of Photo: 10:16 hrs.

Photographer: Vince Damiano

Description: View of four 1-gallon containers found on a shelf in the fuel tank shed containing material that was unidentified at the time of the inspection.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Location: P.C. Pfeiffer Co., Inc.		
City: Beaumont	County/Parish: Jefferson	State: Texas



Photo No. 2

Photo File Name: DSCN7621

Date of Photo: 11/04/2024

Time of Photo: 10:16 hrs.

Photographer: Vince Damiano

Description: View of a discarded used oil filter that was found on the floor of the fuel tank shed.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Location: P.C. Pfeiffer Co., Inc.		
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Photo No. 3

Photo File Name: DSCN7622

Date of Photo: 11/04/2024

Time of Photo: 10:18 hrs.

Photographer: Vince Damiano

Description: View of a half-full 5-gallon container found in the fuel tank shed; the contents were unknown at the time of the inspection but appeared to be an oily liquid.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Location: P.C. Pfeiffer Co., Inc.		
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Photo No. 4

Photo File Name: DSCN7623

Date of Photo: 11/04/2024

Time of Photo: 10:19 hrs.

Photographer: Vince Damiano

Description: View a 55-gallon drum found in the fuel tank shed that was $\frac{1}{4}$ full of an unknown material. The drum appeared to be old and rusted.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Location: P.C. Pfeiffer Co., Inc.		
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Photo No. 5

Photo File Name: DSCN7625

Date of Photo: 11/04/2024

Time of Photo: 10:20 hrs.

Photographer: Vince Damiano

Description: View of two full 55-gallon drums (red drum in the front and the drum directly behind the red one) found in the fuel tank shed that was storing unknown material at the time of the inspection. The other drums pictured were empty.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Location: P.C. Pfeiffer Co., Inc.		
City: Beaumont	County/Parish: Jefferson	State: Texas



Photo No. 6

Photo File Name: DSCN7626

Date of Photo: 11/04/2024

Time of Photo: 10:22 hrs.

Photographer: Vince Damiano

Description: View of a label on one of the 55-gallon drums found in the fuel tank shed found to be storing unknown liquids.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Location: P.C. Pfeiffer Co., Inc.		
City: Beaumont	County/Parish: Jefferson	State: Texas



Photo No. 7

Photo File Name: DSCN7627

Date of Photo: 11/04/2024

Time of Photo: 10:22 hrs.

Photographer: Vince Damiano

Description: Another view of the drums discussed above in Photos 5 and 6.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Location: P.C. Pfeiffer Co., Inc.		
City: Beaumont	County/Parish: Jefferson	State: Texas



Photo No. 8

Photo File Name: DSCN7628

Date of Photo: 11/04/2024

Time of Photo: 10:23 hrs.

Photographer: Vince Damiano

Description: View of three discarded used oil filters found in the fuel tank shed.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Location: P.C. Pfeiffer Co., Inc.		
City: Beaumont	County/Parish: Jefferson	State: Texas



Photo No. 9

Photo File Name: DSCN7629

Date of Photo: 11/04/2024

Time of Photo: 10:25 hrs.

Photographer: Vince Damiano

Description: View of a half-full 55-gallon drum found inside the fuel tank shed that was storing an unidentified liquid at the time of the inspection.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Location: P.C. Pfeiffer Co., Inc.		
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Photo No. 10

Photo File Name: DSCN7630

Date of Photo: 11/04/2024

Time of Photo: 1028 hrs.

Photographer: Vince Damiano

Description: View of the concrete pad behind the fuel tank shed that had evidence of a used oil spill that was not properly cleaned up.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Location: P.C. Pfeiffer Co., Inc.		
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Photo No. 11

Photo File Name: DSCN7631

Date of Photo: 11/04/2024

Time of Photo: 10:28 hrs.

Photographer: Vince Damiano

Description: Another view of the concrete pad behind the fuel tank shed that had evidence of a used oil spill that was not properly cleaned up.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Location: P.C. Pfeiffer Co., Inc.		
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Photo No. 12

Photo File Name: DSCN7632

Date of Photo: 11/04/2024

Time of Photo: 10:31 hrs.

Photographer: Vince Damiano

Description: View of used oil spills found inside the maintenance area. PCP personnel were actively cleaning the spills during the inspection which are the piles of absorbent seen in the photo.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Location: P.C. Pfeiffer Co., Inc.		
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Photo No. 13

Photo File Name: DSCN7633

Date of Photo: 11/04/2024

Time of Photo: 10:32 hrs.

Photographer: Vince Damiano

Description: View of four 5-gallon containers storing used oil filters that were not labeled found in the used oil storage area.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Location: P.C. Pfeiffer Co., Inc.		
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Photo No. 14

Photo File Name: DSCN76234

Date of Photo: 11/04/2024

Time of Photo: 10:32 hrs.

Photographer: Vince Damiano

Description: View of one 10-gallon container storing used oil filters which was not labeled found in the used oil storage area.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Location: P.C. Pfeiffer Co., Inc.		
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Photo No. 15

Photo File Name: DSCN7635

Date of Photo: 11/04/2024

Time of Photo: 10:32 hrs.

Photographer: Vince Damiano

Description: View of two drip pads storing used oil filters which were not labeled found in the used oil storage area.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Location: P.C. Pfeiffer Co., Inc.		
City: Beaumont	County/Parish: Jefferson	State: Texas



Photo No. 16

Photo File Name: DSCN7636

Date of Photo: 11/04/2024

Time of Photo: 10:32 hrs.

Photographer: Vince Damiano

Description: Overview of the used oil storage area including inactive oil storage tanks and used oil filters.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Location: P.C. Pfeiffer Co., Inc.		
City: Beaumont	County/Parish: Jefferson	State: Texas



Photo No. 17

Photo File Name: DSCN7637

Date of Photo: 11/04/2024

Time of Photo: 10:32 hrs.

Photographer: Vince Damiano

Description: View of a used oil spill found on the concrete floor of the maintenance area.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Location: P.C. Pfeiffer Co., Inc.		
City: Beaumont	County/Parish: Jefferson	State: Texas



Photo No. 18

Photo File Name: DSCN7638

Date of Photo: 11/04/2024

Time of Photo: 10:32 hrs.

Photographer: Vince Damiano

Description: View of a used oil spill found on the concrete floor of the maintenance area.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Location: P.C. Pfeiffer Co., Inc.

City: Beaumont

County/Parish: Jefferson

State: Texas



Photo No. 19

Photo File Name: DSCN7639

Date of Photo: 11/04/2024

Time of Photo: 10:33 hrs.

Photographer: Vince Damiano

Description: View of a used oil spill found on the concrete floor of the maintenance area.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Location: P.C. Pfeiffer Co., Inc.		
City: Beaumont	County/Parish: Jefferson	State: Texas



Photo No. 20

Photo File Name: DSCN7640

Date of Photo: 11/04/2024

Time of Photo: 10:33 hrs.

Photographer: Vince Damiano

Description: View of a used oil spill found on the concrete floor of the maintenance area.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Location: P.C. Pfeiffer Co., Inc.		
City: Beaumont	County/Parish: Jefferson	State: Texas



Photo No. 21

Photo File Name: DSCN7641

Date of Photo: 11/04/2024

Time of Photo: 10:41 hrs.

Photographer: Vince Damiano

Description: View of a 55-gallon drum that was found in front of the main entrance to the msintenance area storing unkown liquid; approximatley $\frac{3}{4}$ full.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Location: P.C. Pfeiffer Co., Inc.		
City: Beaumont	County/Parish: Jefferson	State: Texas



Photo No. 22

Photo File Name: DSCN7642

Date of Photo: 11/04/2024

Time of Photo: 10:41 hrs.

Photographer: Vince Damiano

Description: View of a 55-gallon drum that was found in front of the main entrance to the msintenance area storing unkown liquid; approximatley $\frac{3}{4}$ full.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Location: P.C. Pfeiffer Co., Inc.		
City: Beaumont	County/Parish: Jefferson	State: Texas



Photo No. 23

Photo File Name: DSCN7643

Date of Photo: 11/04/2024

Time of Photo: 10:43 hrs.

Photographer: Vince Damiano

Description: View of a discarded aerosol can found on the ground along the perimeter of the maintenance building.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Location: P.C. Pfeiffer Co., Inc.		
City: Beaumont	County/Parish: Jefferson	State: Texas



Photo No. 24

Photo File Name: DSCN7644

Date of Photo: 11/04/2024

Time of Photo: 10:43 hrs.

Photographer: Vince Damiano

Description: View of a discarded aerosol can found on the ground along the perimeter of the maintenance building.

Location: P.C. Pfeiffer Co., Inc.		
City: Beaumont	County/Parish: Jefferson	State: Texas



Photo No. 25

Photo File Name: DSCN7645

Date of Photo: 11/04/2024

Time of Photo: 10:48 hrs.

Photographer: Vince Damiano

Description: View of a 1-gallon container found on a shelf inside the fuel tank shed. The container was about full of unknown liquid.