

INSPECTION REPORT

Inspection Entry Date/Time	6/19/2025 11:15 AM (CT)			Announced: Yes (tenants and related facilities)
Inspection Exit Date/Time	6/19/2025 11:45 AM (CT)			Access: Granted
Regulatory Program	RCRA			
Type of Inspection	Compliance Evaluation Inspection (CEI)			
Facility or Site Name	Allwaste Industrial Services, LLC			
Facility/Site Identifier	TXR000085082			
Facility/Site Physical Address	8718 Unity Drive			
City, State, Zip Code	Baytown, TX 77523			
County/Borough	Chambers County			
Generator Status	Non-generator, Transporter (submitted in 2019 but never used)			
NAICS	48422			
Type of Operation	Allwaste Industrial Services, LLC (Allwaste) offers hydro excavation services for industries using pipelines.			
Geographic Coordinates	29.8197, -94.8801			
Additional Persons Participating in Inspection:				
Name	Title	Organization	Email	Phone
Andrew Swingler	Contractor	Eastern Research Group (ERG)	Andrew.Swingler@erg.com	(717) 357-6661
Lead Inspector:				
Janosh Wolters	Janosh Wolters		Digitally signed by Janosh Wolters Date: 2025.07.23 20:11:57 -04'00'	
	ERG	Janosh.Wolters@erg.com		(484) 678-8675

SECTION I – INTRODUCTION**Site Entry and Purpose of the Inspection**

The Port of Cedar Bayou and surrounding facilities were selected for inspection based on a 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 other records, including photographs taken, 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	Opening Conf.	Closing Conf.
Lead Inspector/ Contractor/ERG	Janosh Wolters	Yes	Yes
Chemical Engineer/ Contractor/ERG	Andrew Swinger	Yes	Yes
Allwaste Industrial Services, LLC/Supervisor	Stephen Smart	Yes	Yes

Facility General Description

Tenant/Area	Inspection Date	Process Description	Area of Concern
Allwaste Industrial Services, LLC	6/19/2025	(Allwaste) provides hydro excavation services for industries using pipelines. The facility does not maintain a MARPOL COA.	No

SECTION II – OBSERVATIONS

Facility: Allwaste Industrial Services, LLC			
Section: 2.1	Date: 6/19/2025, 11:15 AM	Contains AOC: No	Contains CBI: No
Lead Inspector: Janosh Wolters	Attendees: Stephen Smart (Supervisor)		
Allwaste, located in Baymont, TX, provides hydro excavation services to industries, primarily pipelines. Allwaste travels to job sites that require hydro excavation of sediment around pipelines to allow for pipeline repair work. Allwaste uses high pressure water for hydro excavation and collects the sediment/dirt by vacuuming it into a collection tank. The sediment/dirt undergoes analytical testing to ensure it is nonhazardous prior to transportation off the client site. The sediment/dirt analytical includes testing for RCRA metals. Allwaste does not store any hydro-excavated material on site and transports the material directly to Enterprise Cedar Bayou at the completion of services performed. Mr. Smart stated that though material is rarely hazardous, if it is, Allwaste leaves the material on site for the client to handle all hazardous waste generator duties, including transportation of hazardous waste offsite. Allwaste transports all non-hazardous hydro-excavated material using a bill of lading to Enterprise Cedar Bayou, located at 7705 West Bay Road in Baytown, TX 77523. Mr. Smart stated Allwaste does not transport or generate any hazardous waste and that he was unaware the facility had the active EPA ID TXR000085082. Per RCRAInfo, the facility applied for an EPA ID number in 2019 and was registered only as a hazardous waste transporter. After the opening conference, the inspection team observed Allwaste’s facility. The facility consisted of an office building, yard, and maintenance shop. The maintenance shop is used for truck maintenance and used oil is generated from maintenance completed on trucks. Inside the maintenance shop, the inspection team observed one 250-gallon tank of used oil that was approximately ¼ full. The used oil container was closed and labeled “Used Oil” (see Appendix 1 – Photo 1). Allwaste recycles used oil with Flex Oil Services, which picks up the used oil as needed based on truck maintenance completed. Flex Oil Services picks up the used oil at least once per year. At the time of the inspection, Allwaste was not accumulating any universal waste. Next, the inspection team walked through the yard that is used for parking trucks. The inspection team did not observe any waste being accumulated in the yard. The inspection team did not observe any 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 11:45 AM with Allwaste personnel.			

SECTION III – RECORDS REVIEW

No RCRA-regulated records were reviewed during this focused on-site inspection.

SECTION IV – AREAS OF CONCERN

No AOCs were identified at the time of the inspection.

SECTION V – FOLLOW UP

Not Applicable

Communication Log

24 hours prior to the on-site inspection, Janosh Wolters from ERG attempted to notify the facility that ERG would be performing a CEI at Allwaste. Janosh Wolters was forwarded to a voicemail and left a message, but did not receive a call back prior to the on-site inspection.

SECTION VI – LIST OF APPENDICES

Appendix 1. Photograph Log

APPENDIX 1.
PHOTOGRAPH LOG



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Location: Allwaste Industrial Services, LLC		
City: Baytown	County/Parish: Chambers County	State: Texas



Photo No. 1

Photo File Name: DSCN8777.JPG

Date of Photo: 6/19/2025

Time of Photo: 1130 hrs.

Photographer: Janosh Wolters

Description: View of 250-gallon tank accumulating used oil. The container was approximately $\frac{1}{4}$ full and was labeled with the words "Used Oil."