

INSPECTION REPORT

Inspection Entry Date/Time	06/17/2025 09:15 AM (CT)	Announced: Yes	
Inspection Exit Date/Time	06/17/2025 10:32 AM (CT)	Access: Granted	
Regulatory Program	RCRA		
Type of Inspection	Compliance Evaluation Inspection (CEI)		
Facility or Site Name	Shamrock Products Victoria Terminal		
Facility/Site Identifier	TXR000087028		
Facility/Site Physical Address	1894 FM 1432		
City, State, Zip Code	Victoria, TX 77905		
County/Borough	Victoria		
Generator Status	Very Small Quantity Generator (VSQG)		
NAICS	424720		
Type of Operation	Shamrock Products Victoria Terminal (Shamrock) is a bulk liquid storage terminal where trucks, and railcars transport petroleum products in and out of the facility.		
Geographic Coordinates	28°41'28.42"N, 96°58'1.58"W		
Additional Persons Participating in Inspection:			
Name	Title	Organization	Email
Andrew Swingler	Contractor	Eastern Research Group (ERG)	Andrew.Swingler@erg.com
Lead Inspector:	Janosh Wolters Digitally signed by Janosh Wolters Date: 2025.07.23 20:16:14 -04'00'		
Janosh Wolters	Contractor	Eastern Research Group (ERG)	Janosh.Wolters@erg.com

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

The Port of Victoria 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
RCRA Inspector/ Contractor/ERG	Andrew Swinger	Yes	Yes
CEO/Shamrock Products	Shane Steagall	Yes	Yes
Vice President/Shamrock Products	Steve Hernandez	Yes	Yes

Facility General Description

Tenant/Area	Inspection Date	Process Description	Area of Concern
Shamrock Products	6/17/25	Shamrock is a bulk liquid storage terminal where trucks and railcars transport petroleum products in and out of the facility. The facility maintains a MARPOL Annex I and V COA.	No

SECTION II – OBSERVATIONS

Facility: Shamrock Products			
Section: 2.1	Date: 06/17/25, 09:15 AM	Contains AOC: No	Contains CBI: No
Lead Inspector: Janosh Wolters	Attendees: Shane Steagall and Steve Hernandez		
Shamrock, located in Victoria, TX, operates as a bulk liquid storage terminal where trucks and railcars transport petroleum products in and out of the facility. The facility receives petroleum products via truck and railcar. Petroleum products are stored onsite in tanks prior to distribution to clients by rail. Shamrock pumps petroleum products from tanks into outgoing railcars and places secondary containment around the hoses during all transfers. Shamrock leases the property from the Port of Victoria. The Union Pacific Railroad operates the railcars and tracks onsite. Shamrock only generates hazardous waste when it cleans its storage tanks. Shamrock has not needed to clean out any tanks since beginning their operations in May 2023. Shamrock is registered with the EPA as a non-generator of hazardous waste under EPA ID TXR000087028, however, Mr. Steagall stated the facility updated Shamrock’s generator status in March 2025 because Shamrock anticipates needing to clean their storage tanks soon. (see Appendix 2). Shamrock is still exploring what types of chemicals, if any, will be required for tank cleaning. (see Appendix 2). After the opening conference, the inspection team observed Shamrock’s tank storage areas. Shamrock has 16 tanks; 15 tanks have a 1,000-barrel storage capacity, and one decommissioned tank has a 400-barrel storage capacity. The inspection team observed one 55-gallon container of hazardous waste inside the tank farm. The container was closed, in good condition, and labeled. Mr. Steagall explained the waste was from a cleanup effort after an onsite slop oil spill in January 2024. The spill occurred when a transport truck struck a valve on one of the tanks, resulting in a spill of about 500 barrels of slop oil. The investigation is closed and no readings above background were observed. The inspection team did not observe other wastes being accumulated on site. 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 10:25 AM with Legacy personnel. Following the inspection on 6/17/2025, Mr. Steagall sent a follow-up email providing Shamrock’s <i>Texas Commission on Environmental Equality Notice of Registration</i> (see Appendix 2).			

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

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.

Communication Log

24 hours prior to the on-site inspection, Erin Young-Dahl (EPA Region 6) notified the facility that ERG would be performing a CEI at Shamrock.

During the inspection, Mr. Wolters requested the following documents:

1. EPA ID notification (if previously obtained)
2. Texas ID notification

Shamrock responded to the request and provided the *Texas Commission on Environmental Equality Notice of Registration*. VSQGs of hazardous waste do not need to obtain EPA ID numbers because they are exempt from the notification requirements in the Resource Conservation and Recovery Act (RCRA) section 3010 (40 CFR section 262.14).

SECTION VI – LIST OF APPENDICES

Appendix 1. Photograph Log

Appendix 2. 6/18/2025 Response from Shamrock Products

APPENDIX 1.
PHOTOGRAPH LOG

Location: Shamrock Products Victoria Terminal		
City: Victoria	County/Parish: Victoria	State: Texas



Photo No. 1

Photo File Name: DSCN8764
Date of Photo: 6/17/2025
Time of Photo: 1012 hrs.
Photographer: Janosh Wolters

Description: Petroleum products storage tanks.

Location: Shamrock Products Victoria Terminal		
City: Victoria	County/Parish: Victoria	State: Texas



Photo No. 2

Photo File Name: DSCN8765

Date of Photo: 6/17/2025

Time of Photo: 1013 hrs.

Photographer: Janosh Wolters

Description: View of the fence line and how railcars enter the facility.

APPENDIX 2. 06/17/2025 RESPONSE FROM SHAMROCK PRODUCTS

RE: Follow-up from EPA Inspection on 6/17/2025

From Shane Steagall <shane@shamrockproductsusa.com>

Date Tue 6/17/2025 10:27 PM

To Janosh Wolters <janosh.wolters@erg.com>; Steve Hernandez <steve@shamrockproductsusa.com>

Cc Andrew Swingler <Andrew.Swingler@erg.com>

 1 attachment (24 KB)

IHW_NOR_FACREG99113.PDF;

CAUTION: Don't open links or attachments unless you recognize the sender and know they are safe.

Janosh – it was our pleasure, and thanks for the communication on coordinating the meeting. I hope your travels were better today than yesterday!

I've attached the information that I have. I will ask our consultant to see where our EPA ID document came from. I'll be in touch in the coming days.

Feel free to reach out anytime if you need anything further.

Best regards,

Shane

Shane Steagall

Shamrock Products, LLC, President

(832) 427-9251

1110 NASA Parkway, Suite 460

Houston, Tx 77058

<http://www.Shamrockproductsusa.com>



From: Janosh Wolters <janosh.wolters@erg.com>

Sent: Tuesday, June 17, 2025 6:37 PM

To: Shane Steagall <shane@shamrockproductsusa.com>; Steve Hernandez <steve@shamrockproductsusa.com>

Cc: Andrew Swingler <Andrew.Swingler@erg.com>

Subject: Follow-up from EPA Inspection on 6/17/2025

Hi Shane,

I am following up with a list of items and notes from our inspection today. Below is my document request:

- EPA ID notification listing Shamrock as a VSQG
- Texas ID notification

Thank you for taking the time out of your day to meet with us. Please let us know if you have any questions or concerns.

Thanks,
Janosh

Janosh Wolters | ERG
484-678-8675 (cell)

www.ERG.com

Please send any CUI or sensitive information to my ERG email account at janosh.wolters@ergvault.com.

Notice of Registration
Industrial and Hazardous Waste

99113

SHAMROCK PRODUCTS VICTORIA TERMINAL

Solid Waste Registration Number: 99113 EPA Id: TXR000087028

Company Name: Shamrock Products, LLC
Site Name: SHAMROCK PRODUCTS VICTORIA TERMINAL
Site Location:
Primary Contact: STEAGALL, DAVID
Mailing Address: 1110 NASA PKWY STE 460
HOUSTON, TX 77058-3346

Region: 14
County: 235 VICTORIA
Land Type: Private
Title: PRESIDENT
Site Street Address: 1894 FM 1432
VICTORIA, TX 77905

Initial Registration Date: 03/21/2025
Last Amendment Date: 03/21/2025
Last Date NOR Computer update: 04/03/2025
Phone: 281-984-7016

Registration Status: Active
Registration Type: Generator
Generator Type: Industrial
Receiver Type:
Transporter Type:
Transport Wst Class:

Reporting Method: PAPER

Hazardous Waste Generation Status: Conditionally Exempt Small Quantity Generator

Universal Waste Activity:

Large Quantity Handler of Universal Waste (you accumulate 5,000 kg or more):

Type(s) Managed:

Destination Facility for Universal Waste:

NAICS Code: 424710 Petroleum Bulk Stations and Terminals
Tax Identification #: 32064547865
Handler Status:

Operator Information

Name: Shamrock Products, LLC
Phone: 281-984-7016
Address: 1110 NASA PKWY STE 460
HOUSTON, TX 77058-3346

Owner Information:

Name: Shamrock Products, LLC
Phone: 281-984-7016
Address: 1110 NASA PKWY STE 460
HOUSTON, TX 77058-3346

Other Contact: Manager, Environmental
Mailing Address: 1110 NASA PKWY STE 460
HOUSTON, TX 77058-3346

Role: IHW: Owner Contact

Phone: 281-984-7016

As of 03/21/2025 - The next unassigned sequence number for WASTES is 0002 and
The next unassigned sequence number for UNITS is 002

*** TEXAS COMMISSION ON ENVIRONMENTAL QUALITY ***
Notice of Registration
Industrial and Hazardous Waste

Page: 2
Date: 04/04/2025

99113

SHAMROCK PRODUCTS VICTORIA TERMINAL

**** WASTE INFORMATION ****

Texas Waste Code	Waste Class	Status	Date of Status	Managed Onsite/ Offsite	Radio-active	TCEQ Audit Complete
***** Active Wastes *****						
00012191	1	Active	03/21/2025	Off-site	No	No
Description from Generator: OILY WATER, SEDIMENTS AND SLUDGE CONTAINING HYDROCARBONS CAN BE GENERATED FROM FILLING AND EMPTYING THE TANKS, ROUTINE MAINTENANCES, AND/OR TANK CLEANING PROCESS. SPENT FILTERS AND OILY RAGS CAN ALSO BE GENERATED FROM MAINTENANCES, INSPECTIONS, AND CLEANING PROCESS.						
Texas Form Code: 219 Other organic liquids						
Origin Code: 1 Generated on-site from a product process or service activity						
Current Management Units: None						

As of 03/21/2025, The next unassigned sequence number for WASTES is 0002

**** UNITS AT THIS SITE MANAGING WASTE ****

Unit Number	Unit Type	Unit Status	Date of Status	Classes of Waste Managed in Unit Onsite / Offsite	Unit Permit Number	Unit # on Permit	Regulatory Status	Deed Recording Needed/Date
001	Container storage area	ACTIVE	03/21/2025	NA / NA	NA	NA	13 RCRA Pmt Exempt - Accumulation Time	YES /
Description from Company: CENTRAL WASTE MANAGEMENT AREA								
System Types: 141 Storage, bulking, and/or transfer off site -no treatment/recovery, fuel blending or disposal at this site.								

As of 03/21/2025, The next unassigned sequence number for UNITS is 002