

INSPECTION REPORT

Inspection Entry Date/Time	03/14/2024 08:30 (CT)			Announced: No
Inspection Exit Date/Time	03/14/2024 11:40 (CT)			Access: Granted
Regulatory Program	RCRA			
Type of Inspection	Focused Compliance Inspection (FCI)			
Facility or Site Name	Valero Bill Greehey Refineries East			
Facility/Site Identifier	TXD008132268			
Facility/Site Physical Address	1147 Cantwell Ln			
City, State, Zip Code	Corpus Christi, TX 78407			
County/Borough	Nueces County			
Generator Status	Large Quantity Generator (LQG)			
NAICS	32411			
Type of Operation	Valero Bill Greehey Refineries operates as a refinery producing several products including gasoline, jet fuel, diesel, asphalt, and other petrochemicals.			
Geographic Coordinates	27.820277, -97.435			
Additional Persons Participating in Inspection:				
Name	Title	Organization	Email	Phone
Joyce Johnson	Inspector	EPA REGION 6	Johnson.Joyce@epa.gov	(214) 665-8548
Erin Young-Dahl	Inspector	EPA REGION 6	YoungDahl.Erin@epa.gov	(214) 665-3166
Andrew Gates	Contractor	Eastern Research Group (ERG)	Andrew.Gates@erg.com	(657) 206-7829
Lead Inspector:				
Vince Damiano				07/11/2024
	ERG		Vince.Damiano@erg.com	(703) 633-1732

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

The Port of Corpus Christi 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 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
RCRA Inspector/ Contractor/ERG	Andrew Gates	(657) 206-7829	Andrew.Gates@erg.com	Yes	Yes
Inspector/Enforcement Officer/EPA Region 6	Joyce Johnson	(214) 665-8548	Johnson.Joyce@epa.gov	Yes	Yes
Inspector/Enforcement Officer/EPA Region 6	Erin Young-Dahl	(214) 665-3166	YoungDahl.Erin@epa.gov	Yes	Yes

Facility General Description

Tenant/Area	Inspection Date	Process Description	Area of Concern
Valero Bill Greehey Refineries East	03/14/24	Valero Bill Greehey Refineries (Valero) operates as a refinery producing several products including gasoline, jet fuel, diesel, asphalt, and other petrochemicals. Valero receives raw material primarily via ship, but also by pipeline. Refined products go out via ship, barge, truck, and pipeline. The facility maintains a MARPOL COA for Annex I, II, and V but does not receive waste from vessels.	Yes

SECTION II – OBSERVATIONS

Tenant: Valero Bill Greehey Refineries (East)			
Section: 2.1	Date: 03/14/24, 8:30 AM	Contains AOC: Yes	Contains CBI: No
Lead Inspector: Vince Damiano	Attendees: Joe Almaraz (HSE Director), Meagan Marguard (PSM Manager), Marin Maldonado (Environmental Engineer), Faren VonDuben (Environmental Engineer), Kelli Coates (Complex Manager), Marco Rocha (Environmental Tech)		
Valero is located along the Port of Corpus Christi shipping channel and operates as a refinery for fuel oils and petrochemicals. Materials are moved via pipeline, barges, ships, and sometimes trucks. Valero operates on five public docks owned by the Port of Corpus Christi. Valero maintains a MARPOL COA for Annex I, II, and V from the USCG and operates as a LQG of hazardous waste (EPA ID TXD00813268). Valero personnel stated they do not accept waste from ships across their docks and are unaware of any ship-to-ship transfers of waste occurring at their dock spaces. During the inspection, the inspection team observed Valero’s dock spaces. At each dock, there is a rainwater collection sump that collects rainwater and any other liquid material that may end up in the sump. The material is pumped back to Valero’s wastewater treatment plant where it is treated. The inspection team arrived at Oil Dock #6 where a yellow trashcan was found storing a mix of aerosol cans and hydrocarbon contaminated waste debris (see Appendix 1 – Photos 1 through 3). The facility stated that that drum is designated for hydrocarbon waste debris only. The drum was found to be unlabeled and storing unpunctured aerosol cans. [AOC #1 – Valero did not clearly label its containers as “Hazardous Waste” and indicate the hazardous contents – 40 CFR 262.15 (a)(5)] The inspection team did not observe other apparent AOCs at the time of the inspection. A closing conference was conducted at approximately 11:30 PM with Valero personnel. The AOC was communicated during the closing. On 03/15/2024, Valero personnel followed up with an email stating the aerosol cans have been removed from the oily trash and transported to the puncture station. A new SAA was set up at Oil Dock #6 for aerosol can management with proper labeling (see Appendix 2).			

SECTION III – RECORDS REVIEW

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

SECTION IV – AREAS OF CONCERN

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

Tenant: Valero Bill Greehey Refineries (East)		
AOC #1 – Valero did not clearly label its containers as “Hazardous Waste” or indicate the hazardous contents.	Citation: 40 CFR 262.15 (a)(5)	Section: 2.1

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 provision of documents requested.

Communication Log

During and after the inspection, additional information was emailed to EPA including:

1. 03/15/24 Valero email – Faren Von Duben sent an email with their response and corrections made to the AOC noted during the inspection.

SECTION VI – LIST OF APPENDICES

Appendix 1. Photograph Log

Appendix 2. Valero Response 03/15/24

APPENDIX 1.
PHOTOGRAPH LOG



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 1

Location: Valero Bill Greehey Refineries East

City: Corpus Christi

County/Parish: Nueces

State: Texas



Photo File Name: DSCN7157

Date of Photo: 03/14/2024

Time of Photo: 09:29 hrs.

Photographer: Vince Damiano

Description: View of unlabeled drum designated for oil rags containing an unpunctured aerosol can at Oil Dock 6.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 2

Location: Valero Bill Greehey Refineries East		
City: Corpus Christi	County/Parish: Nueces	State: Texas



Photo File Name: DSCN7158

Date of Photo: 03/14/2024

Time of Photo: 09:29 hrs.

Photographer: Vince Damiano

Description: View of an unlabeled drum designated for oil rags containing an unpunctured aerosol can at Oil Dock 6.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 3

Location: Valero Bill Greehey Refineries East

City: Corpus Christi

County/Parish: Nueces

State: Texas



Photo File Name: DSCN7159

Date of Photo: 03/14/2024

Time of Photo: 09:29 hrs.

Photographer: Vince Damiano

Description: View of an unlabeled drum designated for oil rags containing an unpunctured aerosol can at Oil Dock 6.

APPENDIX 2.
VALERO RESPONSE 03/15/24

RE: Follow-up from EPA Visit 3/14/2024

Von Duben, Faren <Faren.VonDuben@valero.com>

Fri 3/15/2024 2:32 PM

To: Vince Damiano <Vince.Damiano@erg.com>; Almaraz, Joe <Joe.Almaraz@valero.com>; Marquard, Meagan <Meagan.Marquard@valero.com>; Maldonado, Marin <Marin.Maldonado@valero.com>; Coates, Kelli <Kelli.Coates@valero.com>; Almaraz, Aimee <Aimee.Almaraz@valero.com>
Cc: Andrew Gates <andrew.gates@erg.com>; Johnson, Joyce-R6 <johnson.joyce-r6@epa.gov>; Young-Dahl, Erin <YoungDahl.Erin@epa.gov>

 1 attachments (253 KB)

Valero CC Follow-up EPA Inspection on 3-14-24.pdf;

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

Hello Vince,

Attached is the follow up from the RCRA inspection on 3/14/2024 at Valero Corpus Christi East Plant Docks as referenced in the email below.

Please let us know if you have any questions, comments, or concerns.

Thank you,

Faren Von Duben

Sr Environmental Engineer
Valero - Bill Greehey Refineries
Office: 361-887-4169
Mobile: 956-454-2517

From: Vince Damiano <Vince.Damiano@erg.com>

Sent: Thursday, March 14, 2024 5:19 PM

To: Almaraz, Joe <Joe.Almaraz@valero.com>; Meagan.marguard@valero.com; Marin.maldonado@valeo.com; Von Duben, Faren <Faren.VonDuben@valero.com>; Coates, Kelli <Kelli.Coates@valero.com>

Cc: Andrew Gates <andrew.gates@erg.com>; Johnson, Joyce-R6 <johnson.joyce-r6@epa.gov>; Young-Dahl, Erin <YoungDahl.Erin@epa.gov>

Subject: Follow-up from EPA Visit 3/14/2024

Hello Joe,

I am following up with a list of items and notes from our inspection today. Below are initial Areas of Concern and items requested:

- Follow-up drum found in Oil Dock 6 designated for oily rags but had aerosol cans in it.

Again, 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. Any follow-up can be sent to myself and the persons attached.

Thanks,
Vince



Vince Damiano

Chemical Engineer, Chantilly Office

Cell: (570) 956-1468

Vince.Damiano@erg.com



Valero Corpus Christi Refinery – East Plant
EPA RCRA Inspection on March 14, 2024
Areas of Concern Response

Area of Concern and Items Requested:

Follow-up drum found in Oil Dock 6 designated for oily rags but had aerosol cans in it.

Valero's Follow-Up (3/15/2024):

On 3/14/2024, aerosol cans that were found in the yellow oily trash bin were separated from the oily trash and transported to the puncture station to safely puncture, drain, and recycle the puncture aerosol cans. A new satellite accumulation area (SAA) was set up at Oil Dock 6 for aerosol can management. A 55-gallon drum with a latching lid was placed in the SAA, with a yellow hazardous waste label, to store the emptied aerosol cans.

The photo below shows the completed follow up.

