

EPA REGION 6 Enforcement Division
INSPECTION REPORT

Inspection Entry Date/Time	05/08/2024 2:45 PM (CT)		Announced: No (tenants and related facilities)	
Inspection Exit Date/Time	05/08/2024 4:45 PM (CT)		Access: Granted	
Regulatory Program	RCRA			
Type of Inspection	Focused Compliance Inspection (FCI)			
Facility or Site Name	PBI International			
Facility/Site Identifier	N/A			
Facility/Site Physical Address	1220 Miller Cut Off Rd			
City, State, Zip Code	La Porte, TX 77571			
County/Borough	Harris			
Generator Status	None			
NAICS	N/A			
Type of Operation	PBI International is a transporter that owns a large truck fleet including vacuum trucks. The company moves materials to and from its clients' facilities.			
Geographic Coordinates	29.706134, -95.066529			
Additional Persons Participating in Inspection:				
Name	Title	Organization	Email	Phone
Dedriel Gardner	Inspector	EPA REGION 6	Gardner.Dedriel@epa.gov	(281) 983-2133
John Penland	Inspector	EPA REGION 6	Penland.John@epa.gov	(214) 665-9717
Anshul Paripati	Contractor	Eastern Research Group (ERG)	Anshul.Paripati@erg.com	(571) 535-1503
Lead Inspector:				
Cameron Tanaka				07/25/2024
	ERG		Cameron.Tanaka@erg.com	(703) 633-1632 ext. 11632

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

Type of inspection: Focused Compliance Inspection (FCI)

The Port of Houston 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	Cameron Tanaka	(703) 633-1632 ext. 11632	Cameron.Tanaka@erg.com	N/A	N/A
RCRA Inspector/ Contractor/ERG	Anshul Paripati	(571) 535-1503	Anshul.Paripati@erg.com	N/A	N/A
Inspector/Enforcement Officer/EPA Region 6	Dedriel Gardner	(281) 983-2133	Gardner.Dedriel@epa.gov	N/A	N/A
Inspector/Enforcement Officer/EPA Region 6	John Penland	(214) 665-9717	Penland.John@epa.gov	N/A	N/A

Facility General Description

Tenant/Area	Inspection Date	Process Description	Area of Concern
PBI International	05/08/24	PBI International (PBI) is a transporter at their other locations, but they do not accept waste on their site. They have tanker trucks that only come back to the site completely cleaned out. PBI does not have a MARPOL COA.	Yes

SECTION II – OBSERVATIONS

Tenant: PBI International			
Section: 2.1	Date: 05/08/24, 2:45 PM	Contains AOC: Yes	Contains CBI: No
Lead Inspector: Cameron Tanaka	Attendees: Jordy Dumas (Safety Director)		
PBI is a transporter that owns a large truck fleet including vacuum trucks. The company moves materials to and from its clients’ facilities. At PBI’s facility on the Houston Ship Channel, all vacuum trucks and containers brought on site or stored on site are empty and clean. Mr. Dumas indicated that the facility does not have any waste on site. After transportation jobs are completed, PBI’s trucks are taken to a third-party tank washer for servicing. This includes heel stripping and cleaning. PBI does not have a MARPOL COA. During the inspection, the inspection team observed PBI’s yard. Observations and Areas of Concern (AOCs) are organized below along with facility responses where relevant. The inspection team viewed many empty drums and other containers scattered throughout the site. In the far back of the facility’s property, the inspection team observed three roll-off boxes, two of which had faded hazardous waste stickers, that contained what appeared to be sandblast media (see Appendix 1 – Photos 1, 2, 3, and 4). PBI stated that the containers were left at their site by the company that owned the property before them [AOC #1 – <i>PBI International must make an accurate determination as to whether the sandblast media in the roll-offs is a hazardous waste to ensure wastes are properly managed according to applicable RCRA regulations - 40 CFR 262.11</i>]. The inspection team also observed that approximately 5000 square feet of sandblast media was covering a part of the ground of the site (see Appendix 1 – Photo 5). This material also did not have a waste determination [AOC #2 – <i>PBI International must make an accurate determination as to whether the sandblast media on the ground is a hazardous waste to ensure wastes are properly managed according to applicable RCRA regulations - 40 CFR 262.11</i>]. The inspection team did not observe other AOCs at the time of the inspection. A closing conference was conducted at approximately 4:30 PM with Mr. Dumas. The AOCs were communicated during the closing. On 06/27/2024, Jason Mungia with PBI responded that the company had collected samples and would develop a disposal plan based on the results (see Appendix 2).			

SECTION III – RECORDS REVIEW

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

SECTION IV – APPARENT AREAS OF CONCERN

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

Tenant: PBI International		
AOC #1 – PBI International must make an accurate determination as to whether the sandblast media in the roll-offs is a hazardous waste to ensure wastes are properly managed according to applicable RCRA regulations.	Citation: 40 CFR 262.11	Section: 2.1
AOC #2 – PBI International must make an accurate determination as to whether the sandblast media on the ground is a hazardous waste to ensure wastes are properly managed according to applicable RCRA regulations.	Citation: 40 CFR 262.11	Section: 2.1

SECTION V – FOLLOW UP**Follow-Up**

Any facility follow-up items are as discussed in each facility's observations in Section II. Documents or files provided by the facilities 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. 06/27/24 PBI International email – Jason Mungia sent an email describing corrective action performed for the lack of waste determinations at their site.

SECTION VI – LIST OF APPENDICES

Appendix 1. Photograph Log

Appendix 2. Follow-Up Email from PBI International

APPENDIX 1.
PHOTOGRAPH LOG



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 1

Location: PBI International		
City: La Porte	County/Parish: Harris	State: Texas



Photo Name: DSC04177

Date of Photo: 05.08.2024

Time of Photo: 15:40 hrs

Photographer: Anshul Paripati

Description: Overview of three roll off containers onsite dating back to 8.11.2023. The containers are believed to be from the previous owners. All three containers had what appeared to be sandblast media and two of them had faded hazardous waste labels.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 2

Location: PBI International		
City: La Porte	County/Parish: Harris	State: Texas

05 08 2024

Photo Name: DSC04178

Date of Photo: 05.08.2024

Time of Photo: 15:40 hrs

Photographer: Anshul Paripati

Description: Close up of the label on the red roll off container shown in photo 41.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 3

Location: PBI International		
City: La Porte	County/Parish: Harris	State: Texas

05 08 2024

Photo Name: DSC04179

Date of Photo: 05.08.2024

Time of Photo: 15:40 hrs

Photographer: Anshul Paripati

Description: Close up of the label on the furthest right brown roll off container shown in picture 41.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 4

Location: PBI International		
City: La Porte	County/Parish: Harris	State: Texas

05 08 2024

Photo Name: DSC04182

Date of Photo: 05.08.2024

Time of Photo: 15:40 hrs

Photographer: Anshul Paripati

Description: Close up of the label on the middle brown roll off container shown in picture 41.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 5

Location: PBI International		
City: La Porte	County/Parish: Harris	State: Texas



Photo Name: DSC04183

Date of Photo: 05.08.2024

Time of Photo: 15:45 hrs

Photographer: Anshul Paripati

Description: Overview of the area covered with sandblast media.

APPENDIX 2.
FOLLOW-UP EMAIL FROM PBI INTERNATIONAL

RE: Follow-Up on EPA Inspection 5/8/24 (PBI International)

Jason Munguia <jason.munguia@pbi-international.com>

Thu 2024-06-27 4:30 PM

To: Cameron Tanaka <Cameron.Tanaka@erg.com>

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

Good afternoon,

I apologize for the delayed response as your emailed went to my other inbox. We have pulled samples to be sent for analytical then based on the results we will develop a disposal plan.

Jason Munguia

361-947-4433

www.pbi-international.com



From: Cameron Tanaka <Cameron.Tanaka@erg.com>

Sent: Monday, June 24, 2024 5:22 PM

To: Jason Munguia <jason.munguia@pbi-international.com>

Subject: Re: Follow-Up on EPA Inspection 5/8/24 (PBI International)

Hi Jason,

I wanted to let you know that we are working on getting the report out this week. Let me know if you have your follow-up information or when you will be able to send it.

Best,

Cameron