

INSPECTION REPORT

Inspection Date(s):	02/15/2022 - 02/16/2022	Announced: No			
Time:	Entry: 09:15 AM (CT)	Exit: 11:47 AM (CT)			
Media:	Water				
Statute(s)/Program(s):	Clean Water Act, NPDES, Stormwater – Industrial				
Type of inspection:	CEI - Compliance Evaluation Inspection				
Access:	Granted				
Permittee Name:	HRP BROWNSVILLE				
Facility or Site Name:	HRP BROWNSVILLE				
Facility/Site Physical Address:	16200 JOSE GARZA RD				
(City, state, zip code)	BROWNSVILLE, TX 78521				
County/Parish:					
Facility GPS Coordinates:	25.966119, -97.369274				
Mailing address: (If different)					
(City, state, zip code)					
Facility/Site Identifier:	110064287999				
Permit Number:	TXR05DF29				
SIC or NAICS:					
Persons Participating in Inspection:					
Title	Name	Phone	Email	Present at Opening Conf.	Present at Closing Conf.
Lead Inspector	Kenneth AuBuchon	(281) 983-2151	aubuchon.kenneth@epa.gov	Yes	Yes
EPA Inspector	Scott Rice	(304) 231-0501	rice.scott@epa.gov	Yes	Yes
SteelCoast President	Mark Hodgson	(956) 509-2031	m Hodgson@steelcoastus.com	Yes	Yes
EHS Manager	Felipe Ramirez	(956) 509-2031	framirez@steelcoastus.com	Yes	Yes
VP-Marine Operations	Mike Furgatch	(956) 509-2031	mfurgatch@steelcoastus.com	Yes	No
Project Accountant	Antonio Medrano	(956) 509-2031-783	amedrano@steelcoastus.com	Yes	No
Chief Financial Officer	Alberto Garcia	(956) 509-2031	agarcia@steelcoastus.com	Yes	No
EPA Inspector	Jessica Schlafstein	(912) 667-6492	schlafstein.jessica@epa.gov	Yes	No

EPA Inspector - EPA Site Lead	Angela Hays	(214) 665-2285	hays.angela@epa.gov	Yes	No
EPA Contractor	Lydia Johnson		lydia.johnson@erg.com	Yes	No
OSHA Inspector	Saul Charles			Yes	No
OSHA Inspector	Stephanie Dovalina			Yes	No

Lead Inspector:

Kenneth AuBuchon

REGION 6

aubuchon.kenneth@epa.gov

Supervisor Review:

Roberto Bernier

REGION 6

bernier.roberto@epa.gov

SECTION I – INTRODUCTION**Site Entry and Inspection Objectives**

REGION 6 Lead Inspector, Kenneth AuBuchon, arrived at the HRP BROWNSVILLE (the “Site” or “Facility”), located at 16200 JOSE GARZA RD, at 09:15 AM (CT) on 02/15/2022 for an unannounced inspection. REGION 6 Lead Inspector presented his/her credentials to Mike Furgatch and informed him/her that this was a REGION 6 inspection to determine compliance with the Clean Water Act (CWA) and the National Pollutant Discharge Elimination System (NPDES) permit program. The inspection was conducted under the authority of REGION 6 NPDES permit program, under the authority of the Federal CWA of Section 308. The table above identifies the attendees that participated in the inspection. This report is based on information supplied by HRP BROWNSVILLE representatives, observations made by the REGION 6 inspector, and records and reports maintained by the permittee and the REGION 6 including: direct observations made by the REGION 6 Inspector(s), photographs taken by REGION 6 inspector(s), physical evidence collected by the REGION 6 inspector(s), measurements taken by REGION 6 inspector(s), verbal or written statements made by information supplied by HRP BROWNSVILLE representatives(the permittee) during or subsequent to the on-site Inspection, and materials, processes, data, photographs, or documents shown, demonstrated, or submitted to the REGION 6 inspector(s) by HRP BROWNSVILLE representatives during or subsequent to the on - site Inspection. In addition, information gathered prior to or subsequent to the Inspection from a review of USEPA, State, and public records may be included in this report.

Facility/Site Description

REGION 6 lead inspector confirmed the following facility information:

HRP Brownsville, LLC dba Steel Coast is a ship recycling and scraps processing company with one of the largest and most technologically advanced reclamation, remediation, and recycling facilities located in North America. Located 16200 Jose Garza Rd. Brownsville, Texas on an 82-acre Facility on the North side of the Port of Brownsville, Texas, Steel Coast dismantles US Navy and Merchant Ships by evaluating each ship for hazardous materials and liquids before dismantling occurs on cutting pads and metal separation areas. Metals are separated by type and transported for off-site recycling. The Facility also provides automotive Industrial decommissioning as well as other industrial and commercial sources of recyclable metals. The facility coordinates are N 25° 57' 52" Latitude and W 97° 22' 12" Longitude. The facility is located in Cameron County. A Site Location Map and a Surface Drainage Diagram (Appendix A), of the Facility are provided. This Facility operates under the primary NAICS code of 423930 - Recyclable Materials Merchant Wholesalers and the primary SIC Code 5093 - Scrap and Waste Materials. The Facility operates 13 hours a day M-F (6 am to 7 pm) and 4 hrs on some Saturdays.

Facility/Site Information

Responsible official	Mark Hodgson
Name of the person engaging with the inspector	Felipe Ramirez
Is the SWPPP team present	Yes
Size of Facility	88 acres

Shifts/Hours/Days of Operations/Shutdowns	13 hours M-F 6am -7pm
Is property owned or leased?	Leased (site is owned by Brownsville Navigation District)
Type of Operation	Ship Recycling and Scrap process
Industrial Sector/Sub-sector	SIC 5093
Industrial activities exposed to stormwater	Marine vessel dismantling and recycling, Torch cutting, metal scrapping and recycling, vehicle shredding
BMPs/Stormwater Treatment	See SWPPP
Number/location of Stormwater Inlets/ Outfalls/Drains including near docks or storage areas and where they initially drain (MS4, ditch detention basin)	See SWPPP
Receiving Water	Brownsville Ship Channel, Reach Basin: South Bay (Oyster Waters)

Location(s)

Location/Area/Sub-area	Description
Stormwater SWPPP	Discharge Locations listed in the SWPPP
Wastewater	Discharge - Pretreatment Process

SECTION II – OBSERVATIONS

Observations may not be in sequential order.

Location: Stormwater SWPPP	Contains CBI: No
Observation #: KA1-OB-001	Date: 02/15-16/2022
As part of the inspection, the Storm Water Pollution Prevention Plan (SWPPP) was reviewed for the effectiveness and implementation to protect storm water discharges. No areas of concern were noted with the SWPPP during this review.	

SECTION III – RECORDS REVIEW

Records may not be in sequential order.

Record: SWPPP		AOC: No
Ref #: KA1-RR-001	Reviewed By: Kenneth AuBuchon	Reviewed Date: 02/15-16/2022

SECTION IV – SAMPLING ACTIVITIES AND ANALYTICAL RESULTS

No sampling was conducted.

SECTION V - AREAS OF CONCERN

I observed no areas of concern at the time of the inspection.

SECTION VI – CLOSING CONFERENCE AND FOLLOW UP

Closing Conference

The REGION 6 Lead Inspector held a closing conference with Facility personnel at 11:47 AM (CT) on 02/16/2022 for the inspection. During the closing conference, REGION 6 Lead Inspector discussed the observations and Areas of Concern identified during the inspection. Observations and Areas of Concern have not yet been evaluated for a formal compliance determination.

Follow Up

No follow up was required after exiting the facility on 02/15/2022.

I observed no follow up at the time of the inspection.

Communication Log

No additional information received by REGION 6 after exiting the Facility on 02/16/2022.