

Region 6 - Enforcement & Compliance Assurance Division
INSPECTION REPORT

Inspection Date(s):	February 6, 2025	
Media Program:	Resource Conservation and Recovery Act	
Regulatory Program(s)	Very Small Quantity Generator	
Company Name:	Sound Resource Solutions, LLC	
Facility Name:	Sound Resource Solutions	
Facility Physical Location:	731 FM 1127 Road	
(city, state, zip code)	Shepherd, Texas 77371	
Mailing address:	731 FM 1127 Road	
(city, state, zip code)	Shepherd, Texas 77371	
County/Parish:	San Jacinto County	
Facility Phone Number	404-735-2818	
Facility Contact:	Thomas Mwangi	Owner
	thomasm@soundrs.net	
FRS Number:	110040102288	
Identification/Permit Number:	NA	
Media Identifier Number:	TXR000079927	
NAICS:	484220	
SIC:		
Personnel participating in inspection:		
John Penland	USEPA Region 6 (ECAD)	Senior Environmental Scientist
Thomas Mwagni	Sound Resource Solutions, LLC.	Owner
Kyle Marcantel	Sound Resource Solutions, LLC.	Material Handler
Greg Watson	R and F Industries	General Manager
Stu McBride	Ridgeline Engineering, LLC.	Environmental Consultant
EPA Lead Inspector Signature/Date	JOHN PENLAND John Penland - Lead Inspector	Digitally signed by JOHN PENLAND Date: 2025.03.11 10:16:29 -05'00' Date
Supervisor Signature/Date	DEBRA PANDAK Debra Pandak – RCRA Section Supervisor	Digitally signed by DEBRA PANDAK Date: 2025.03.11 11:49:36 -05'00' Date

Section I – INTRODUCTION

On February 6, 2025, I John Penland conducted an unannounced inspection of the Sound Resource Solutions, LLC. (SRS) facility located at 731 FM 1127 in Shepherd, Texas, for compliance with the Resource Conservation and Recovery Act (RCRA). Upon entry to the facility, I met with Mr. Kyle Marcantel, an employee of SRS. I presented my credentials to him and informed him that this was an EPA inspection under the authority of Section 3007 of RCRA. Mr. Marcantel contacted Mr. Greg Watson, former facility manager, and Mr. Thomas Mwagni, SRS owner, to notify them that I was there for an unannounced inspection. They instructed Mr. Marcantel to act as an escort and liaison for me during this inspection.

The SRS facility was selected for inspection to evaluate the continuing operations of SRS and assess the company's cleanup efforts following a November 2023 fire that destroyed all the facility structures and operating equipment.

The facility occupies 30 acres located at 731 FM 1127 in Shepherd, Texas. SRS is currently in the process of closing the facility and maintains only one employee onsite as it unwinds its operations. The November 2023 fire destroyed all structures and operating equipment on the property. Since the fire, SRS began solvent blending operations using portable tanks, but this operation ceased prior to January 10, 2025. Raw materials, production wastes, and some unsold products remain stored in containers onsite. In addition, some debris and materials impacted by the fire remain at the facility. The facility remains unsecured with uncontrolled pedestrian access and only one person present during normal business hours. Some of the management personnel and many of the raw materials are being transferred to R and F Industries located in Luling, Texas, a facility recently purchased by some of the owners of SRS.

The site is registered as a very small quantity generator with the EPAID: TXR000079927.

Section II – OBSERVATIONS

Beginning at approximately 9:30am on February 6, 2025, and accompanied by Kyle Marcantel, I conducted a walkthrough of the facility. During this walkthrough, I took an inventory of chemical containers stored onsite and documented the facility's condition. This walkthrough was documented using a hand-drawn map, photographs, and a written table using the labels and Mr. Marcantel's knowledge to determine the contents of the containers. Photographs taken during this inspection are included as Appendix 1. The hand-drawn site map is included as Appendix 2.

Prior to January 10, 2025, the facility conducted chemical blending and repackaging operations. At the time of this inspection, containers of these products and raw materials were still located onsite. According to Mr. Marcantel, the facility had not determined how these materials were going to be managed and were being stored until that determination could be made. The facility is also storing empty containers both new and used. The used containers are intended to be sent for scrap metal recycling and new containers sent to the R & F Industries location in Luling, TX.

The facility is also continuing remediation activities from the November 2023 fire. One pile of fire debris was still present on the concrete foundation of the former plant office building. According to Mr. Stu McBride, the contractor overseeing the remediation, the waste pile was sampled and determined to be a non-hazardous industrial solid waste. This waste was awaiting transport to an offsite landfill. During the immediate response, the facility constructed a large retention pond to impound the firefighting water generated during the response. This firefighting water was sent to Texas Molecular in Deer Park, Texas for disposal in a hazardous waste injection well. However, SRS has been unable to complete the sampling for closure of this surface impoundment due to refill from rainwater runoff at the site.

I concluded my walkthrough and departed the facility at approximately 12:15pm.

Section III – FOLLOW-UP

On February 24, 2025, I sent Mr. Mwagni an inventory of the chemical containers located at the Shepherd facility accompanied by the following request for information:

“The definition of solid waste codified at 40 CFR 261.2 includes storage in anticipation of or in lieu of disposal. Since the facility has ceased manufacture of its products, it is currently engaged in storage of the various chemicals present on the site at the time of this inspection with no anticipated onsite use. Therefore, for each container or material onsite, I am requesting:

1. A determination of whether that material will be managed as a solid or hazardous waste or as a commercial chemical product.
2. For each material determined to be a waste, what are the EPA and State waste codes that apply to that waste and what will be the anticipated means of disposal?
3. For each material determined to be a product, who will be taking possession of the material and what is its anticipated use?”

Mr. Mwagni provided a response to this request on March 4, 2025, in the form of an annotated version of the site inventory I provided on February 24, 2025. This document is included as Appendix 3. On March 5, 2025, Mr. Mwagni supplemented this response with shipping documents for those chemicals that had been shipped offsite as of that date. These records are included as Appendix 4

Section IV – AREAS OF CONCERN

Identification and Management of Hazardous Waste

The RCRA regulatory standards applicable to hazardous waste generators are codified at 40 Code of Federal Regulations (CFR) Part 262. These regulations require generators of solid waste to make a waste determination at the point of generation for any waste they generate (40 CFR 262.11). This point of generation is where the material in question meets the definition of solid waste codified in 40 CFR Part 261.2 and includes the point at which a material is being stored before or in-lieu of disposal.

When the facility ceased manufacturing operations on January 10, 2025, the chemicals remaining at the facility started a period of storage where they were destined for either sale or disposal. At the time of this inspection on February 6, 2025, the facility had not made any waste determinations or marked any of the chemical containers according to the requirements for hazardous waste containers. After the inspection, documents provided by SRS indicated that up to 22 of the containers observed could have contained hazardous waste.

Section V – LIST OF APPENDICES

Appendix 1 – Inspection Photo Log

Appendix 2 – Inspector’s Site Map

Appendix 3 – Annotated Container Inventory

Appendix 4 – Container Shipping Records as of March 5, 2025

Appendix 5 – Daily Inspection Summary and Follow-up Information Request

Appendix 6 – Notice of Registration for Sound Resource Solutions, LLC. as of February 6, 2025

Appendix 1

Inspection Photo Log

Camera:	Dell Latitude 7230	
S/N:	B87D0659-00000-00003-AA951	
EPA Tag:	None	

Photo Number	File Name		Date	Time	Photographer	Description
1	WIN_20250206_10_04_29_Pro	.JPG	6-Feb-25	10:04am	John Penland	SRS facility entrance off FM1127
2	WIN_20250206_10_05_09_Pro	.JPG	6-Feb-25	10:05am	John Penland	Debris pile from November 2023 fire. Sampled by SRS. Characterized as non-hazardous industrial waste for disposal
3	WIN_20250206_10_06_23_Pro	.JPG	6-Feb-25	10:06am	John Penland	275-gallon containers located in area A on site map. Two sulfuric acid and two water
4	WIN_20250206_10_08_47_Pro	.JPG	6-Feb-25	10:08am	John Penland	Tanker trailers 1 through 13 on site map.
5	WIN_20250206_10_09_41_Pro	.JPG	6-Feb-25	10:09am	John Penland	Containers located in area B on site map.
6	WIN_20250206_10_10_04_Pro	.JPG	6-Feb-25	10:10am	John Penland	Containers located in area B on site map.
7	WIN_20250206_10_14_45_Pro	.JPG	6-Feb-25	10:14am	John Penland	Containers located in area B on site map.
8	WIN_20250206_10_15_51_Pro	.JPG	6-Feb-25	10:15am	John Penland	Containers located in Area C on site map.
9	WIN_20250206_10_15_59_Pro	.JPG	6-Feb-25	10:15am	John Penland	Containers located in Area C on site map.
10	WIN_20250206_10_16_02_Pro	.JPG	6-Feb-25	10:16am	John Penland	Containers located in Area C on site map.
11	WIN_20250206_10_16_08_Scan	.JPG	6-Feb-25	10:16am	John Penland	Containers located in Area C on site map.
12	WIN_20250206_10_16_21_Scan	.JPG	6-Feb-25	10:16am	John Penland	Containers located in Area C on site map.
13	WIN_20250206_10_16_38_Scan	.JPG	6-Feb-25	10:16am	John Penland	Containers located in Area C on site map.
14	WIN_20250206_10_20_51_Pro	.JPG	6-Feb-25	10:20am	John Penland	Containers located in Area C on site map.
15	WIN_20250206_10_20_57_Pro	.JPG	6-Feb-25	10:20am	John Penland	Containers located in Area C on site map.
16	WIN_20250206_10_21_03_Pro	.JPG	6-Feb-25	10:21am	John Penland	Containers located in Area C on site map.
17	WIN_20250206_10_21_11_Pro	.JPG	6-Feb-25	10:21am	John Penland	Containers located in Area C on site map.
18	WIN_20250206_10_21_18_Pro	.JPG	6-Feb-25	10:21am	John Penland	Containers located in Area C on site map.

Camera:	Dell Latitude 7230	
S/N:	B87D0659-00000-00003-AA951	
EPA Tag:	None	

Photo Number	File Name		Date	Time	Photographer	Description
19	WIN_20250206_10_21_28_Pro	.JPG	6-Feb-25	10:21am	John Penland	Containers located in Area C on site map.
20	WIN_20250206_10_21_37_Pro	.JPG	6-Feb-25	10:21am	John Penland	Containers located in Area C on site map.
21	WIN_20250206_10_22_07_Pro	.JPG	6-Feb-25	10:22am	John Penland	Containers located in Area C on site map.
22	WIN_20250206_10_22_12_Pro	.JPG	6-Feb-25	10:22am	John Penland	Containers located in Area C on site map.
23	WIN_20250206_10_22_21_Pro	.JPG	6-Feb-25	10:22am	John Penland	Containers located in Area C on site map.
24	WIN_20250206_10_22_28_Pro	.JPG	6-Feb-25	10:22am	John Penland	Containers located in Area C on site map.
25	WIN_20250206_10_22_41_Pro	.JPG	6-Feb-25	10:22am	John Penland	Containers located in Area C on site map.
26	WIN_20250206_10_23_01_Pro	.JPG	6-Feb-25	10:23am	John Penland	Containers located in Area C on site map.
27	WIN_20250206_10_23_12_Pro	.JPG	6-Feb-25	10:23am	John Penland	Containers located in Area C on site map.
28	WIN_20250206_10_23_20_Pro	.JPG	6-Feb-25	10:23am	John Penland	Containers located in Area D on site map.
29	WIN_20250206_10_23_29_Pro	.JPG	6-Feb-25	10:23am	John Penland	Containers located in Area D on site map.
30	WIN_20250206_10_23_57_Pro	.JPG	6-Feb-25	10:23am	John Penland	Containers located in Area I on site map.
31	WIN_20250206_10_24_04_Pro	.JPG	6-Feb-25	10:24am	John Penland	Containers located in Area I on site map.
32	WIN_20250206_10_24_08_Pro	.JPG	6-Feb-25	10:24am	John Penland	Containers located in Area I on site map.
33	WIN_20250206_10_24_12_Pro	.JPG	6-Feb-25	10:24am	John Penland	Containers located in Area I on site map.
34	WIN_20250206_10_24_24_Pro	.JPG	6-Feb-25	10:24am	John Penland	Containers located in Area I on site map and TT19 and TT20
35	WIN_20250206_10_24_35_Pro	.JPG	6-Feb-25	10:24am	John Penland	Containers located in Area I on site map.
36	WIN_20250206_10_24_53_Pro	.JPG	6-Feb-25	10:24am	John Penland	Containers located in Area H on site map.
37	WIN_20250206_10_25_19_Pro	.JPG	6-Feb-25	10:25am	John Penland	Containers located in Area E on site map.
38	WIN_20250206_10_25_53_Pro	.JPG	6-Feb-25	10:25am	John Penland	Containers located in Area F on site map.

Camera:	Dell Latitude 7230	
S/N:	B87D0659-00000-00003-AA951	
EPA Tag:	None	

Photo Number	File Name		Date	Time	Photographer	Description
39	WIN_20250206_10_26_17_Pro	.JPG	6-Feb-25	10:26am	John Penland	Containers located in Area F on site map.
40	WIN_20250206_10_26_22_Pro	.JPG	6-Feb-25	10:26am	John Penland	Containers located in Area J on site map.
41	WIN_20250206_10_26_31_Pro	.JPG	6-Feb-25	10:26am	John Penland	Containers located in Area F on site map.
42	WIN_20250206_10_27_19_Pro	.JPG	6-Feb-25	10:27am	John Penland	Containers located in Area G on site map.
43	WIN_20250206_10_27_33_Pro	.JPG	6-Feb-25	10:27am	John Penland	Containers located in Area G on site map.
44	WIN_20250206_10_27_43_Pro	.JPG	6-Feb-25	10:27am	John Penland	Containers located in Area G on site map.
45		.JPG			John Penland	
46		.JPG			John Penland	
47		.JPG			John Penland	
48		.JPG			John Penland	
49		.JPG			John Penland	
50		.JPG			John Penland	
51		.JPG			John Penland	
52		.JPG			John Penland	
53		.JPG			John Penland	
54		.JPG			John Penland	
55		.JPG			John Penland	
56		.JPG			John Penland	
57		.JPG			John Penland	
58		.JPG			John Penland	



Photo 1



Photo 2



Photo 3



Photo 4



Photo 5



Photo 6



Photo 7



Photo 8



R&L Carriers

4359 W. 36TH ST.
Chicago, IL 60632

Product for Reuse

Shipping Description:



R&L Carriers

375 Second ST
Elgin, IL. 60123

Product for Reuse

Shipping Description:

Photo 12

1850 5605-6
ELG

1850 5605-6
ELG



Photo 13



Photo 14



Photo 15

R&L Carriers

375 Second ST

Elgin, IL. 60123

Product for Reuse

Shipping Description:

20 P BULK VESSEL
LIQUIDS, CHEMICALS
3.19 g/l





Photo 17





Photo 19



Photo 20



Photo 21



RECYCLE

Order #: 629303-07 (E)

FEDERAL AND/OR STATE LAW PROHIBITS IMPROPER DISPOSAL
If found, contact the nearest police or public safety authority, the
U.S. Environmental Protection Agency or the State Department of
Environmental Protection

GENERATOR INFORMATION:
Kuraray America, Inc. - Eval
11500 Bay Area Blvd, Pasadena TX 77507-1312
PPA ID: TXD981148059

UN1230

D.O.T. PROPER SHIPPING NAME:
UN1230, METHANOL, 3, PG II, ERG 131

Waste Name: Methanol and Water (Product)
State/ Waste Codes: RECYCLED
Manifest ID #: RERS000906 | Line #: 1 | Seq #:
Approval Number
TSD#: Solid Resource Solutions (SRS)
PUP: 09/24/2024
RERS00906 | 8





Photo 23



Order #: 629578-04 (E)

RECYCLE

FEDERAL AND/OR STATE LAW PROHIBITS IMPROPER DISPOSAL
If found, contact the nearest police or public safety authority, the
U.S. Environmental Protection Agency or the State Department of
Environmental Protection.

GENERATOR INFORMATION:

ADVARTO GALVESTON COUNTY, LLC
2301 HWY 146 S. TEXAS CITY TX 77590
EPA ID: TXR000084112

UN1989

D.O.T PROPER SHIPPING NAME:

RQ, UN1989, ALDEHYDES, N.O.S. (CONTAINS BUTRALDEHYDE,
ISOBUTRALDEHYDE), 3, PG II (RQ = 100), ERG 129p

Waste Name: BUTYRALDEHYDE FOR RECYCLE

State Waste Codes: RECY

EPA Waste Codes:

Manifest ID #: SRS629578 Line #: 1 | Sec: 2

Approval Number: 214124

TSD#: Sound Resource Solutions (SRS)

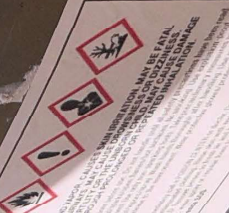
PUP: 09/25/2024



SRS629578-1-2



FLAMMABLE
EXCEPTED



HAZARDOUS MATERIALS
UN 1200
FLAMMABLE LIQUIDS
EXCEPTED
CLASS 3
PACKING GROUP II
NET WEIGHT 1500 LBS

Transport
1650 kg max



Photo 26



Photo 27



Photo 28







Photo 31







Photo 34





Photo 36



Photo 37



Photo 38



Photo 39



Photo 40



Photo 41



Photo 42





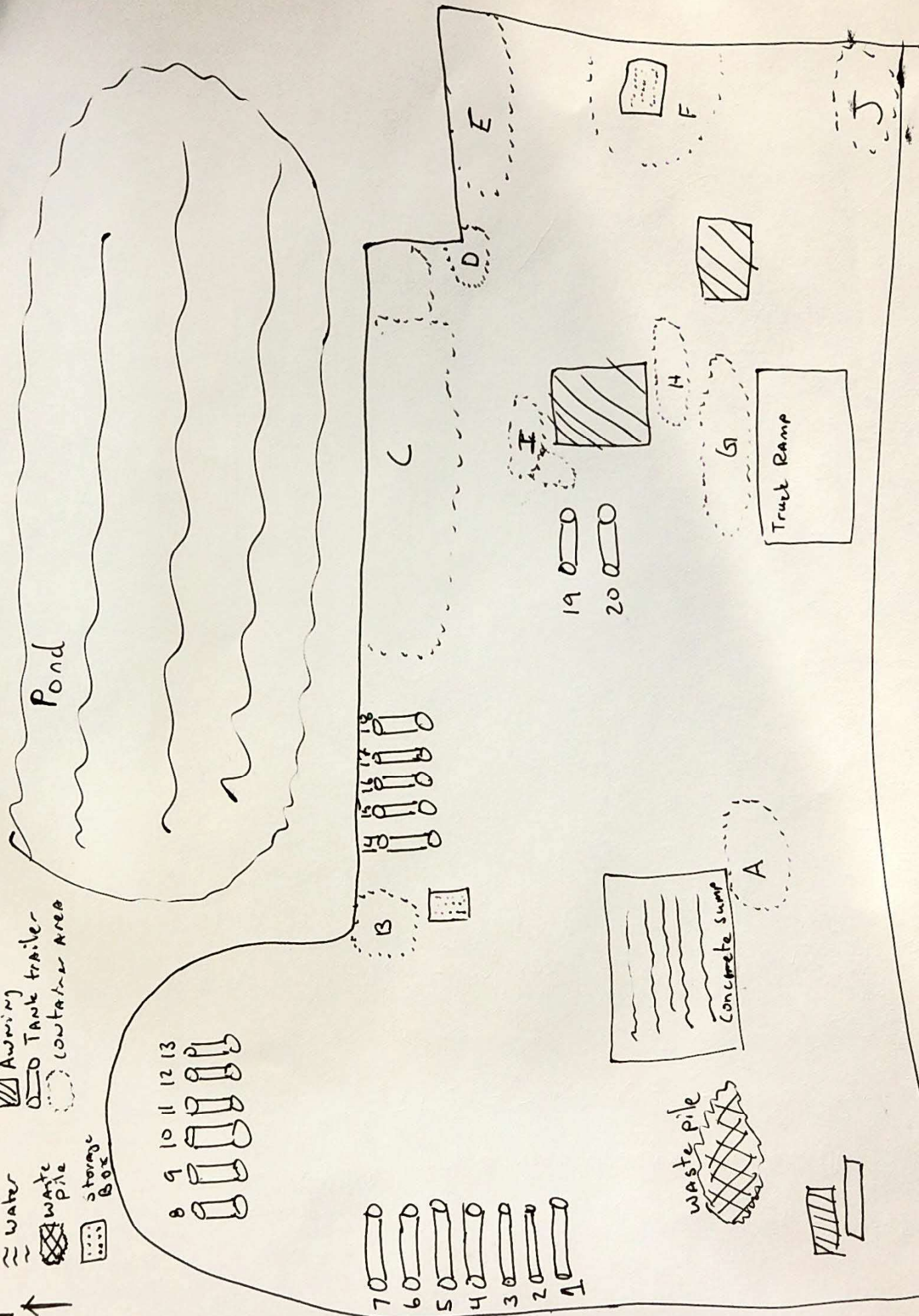
Photo 44

Appendix 2

Facility Site Map

N ↑

- Water
- Water pile
- Storage Box
- Awaying
- Tank trailer
- Container Area



FM 1127

Appendix 3

Annotated Container Inventory

Location	Container Type	Quantity	Contents	Comments	Material Type	Company Taking Possession	BOL Number	Address	Anticipated Use	EPA Waste Code	Texas Waste Code	Means of Disposal
F	275-gallon tote	1	12012 Product	50 Gallons	Universal Hazardous Waste	Buzz Unicom USA	251305-001	2524 South Springs St Cape Girardeau, MO 65703	Thermal Destruction			
TT18	Tanker Truck	1	Flammable Liquid NOS		Universal Hazardous Waste	Buzz Unicom USA	251305-001	2524 South Springs St Cape Girardeau, MO 65703	Thermal Destruction			
C	275-gallon tote	3	Heane		Universal Hazardous Waste	Buzz Unicom USA	251305-001	2524 South Springs St Cape Girardeau, MO 65703	Thermal Destruction			
TT16	Tanker Truck	1	Heane		Universal Hazardous Waste	Buzz Unicom USA	250205-001	2524 South Springs St Cape Girardeau, MO 65703	Thermal Destruction			
C	275-gallon tote	2	Isopropyl Alcohol and Diesel		Universal Hazardous Waste	Buzz Unicom USA	251305-002	2524 South Springs St Cape Girardeau, MO 65703	Thermal Destruction			
C	275-gallon tote	2	Methanol		Universal Hazardous Waste	Buzz Unicom USA	251305-002	2524 South Springs St Cape Girardeau, MO 65703	Thermal Destruction			
C	55-gallon drum	2	Methanol		Universal Hazardous Waste	Buzz Unicom USA	251305-002	2524 South Springs St Cape Girardeau, MO 65703	Thermal Destruction			
C	275-gallon tote	2	UVA150		Universal Hazardous Waste	Buzz Unicom USA	250205-002	2524 South Springs St Cape Girardeau, MO 65703	Thermal Destruction			
G	Misc	?	Scrap containers		Scrap	J and L Recycling		2501 US -49 Shepherd, Texas 77371	Recycled			
J	?	?	Scrap containers		Scrap	Montgomery-Wheeler Corporation		2501 US -49 Shepherd, Texas 77371	Recycled			
TT10	Tanker Truck	1	Isopropyl Alcohol		Commercial Chemical Product	Montgomery-Wheeler Corporation	021225-14	2535 Plantation Center Dr. Matthews NC 28105	Resale			
C	275-gallon tote	42	Isopropyl Alcohol		Commercial Chemical Product	Montgomery-Wheeler Corporation	030525-14	2535 Plantation Center Dr. Matthews NC 28105	Resale			
B	325-gallon tote	1	50% Sodium Hydroxide		Commercial Chemical Product	R&F Industries, Inc.	250215-001	402 W Davis St Luling, TX 72486	Bending Operations			
C	15-gallon drum	1	50% Sulfuric Acid		Commercial Chemical Product	R&F Industries, Inc.	250215-001	402 W Davis St Luling, TX 72486	Bending Operations			
B	15-gallon drum	4	85% Sulfuric Acid		Commercial Chemical Product	R&F Industries, Inc.	250215-001	402 W Davis St Luling, TX 72486	Bending Operations			
F	275-gallon tote	1	Acid Rinse		Commercial Chemical Product	R&F Industries, Inc.	250215-001	402 W Davis St Luling, TX 72486	Bending Operations			
C	275-gallon tote	1	Acid Rinse Water		Commercial Chemical Product	R&F Industries, Inc.	250215-001	402 W Davis St Luling, TX 72486	Bending Operations			
C	275-gallon tote	1	Acetylenes		Commercial Chemical Product	R&F Industries, Inc.	250215-002	402 W Davis St Luling, TX 72486	Bending Operations			
D	55-gallon drum	1	Diesel		Commercial Chemical Product	R&F Industries, Inc.	250215-002	402 W Davis St Luling, TX 72486	Compressor Oil			
E	275-gallon tote	1	Diesel		Commercial Chemical Product	R&F Industries, Inc.	250215-002	402 W Davis St Luling, TX 72486	Bending Operations			
B	275-gallon tote	1	Endry		Commercial Chemical Product	R&F Industries, Inc.	250215-002	402 W Davis St Luling, TX 72486	Bending Operations			
C	275-gallon tote	1	Endry		Commercial Chemical Product	R&F Industries, Inc.	250215-002	402 W Davis St Luling, TX 72486	Bending Operations			
C	275-gallon tote	100	Endry		Commercial Chemical Product	R&F Industries, Inc.	250215-002	402 W Davis St Luling, TX 72486	Bending Operations			
G	55-gallon drum	32	Endry		Commercial Chemical Product	R&F Industries, Inc.		402 W Davis St Luling, TX 72486	Packaging			
C	275-gallon tote	2	2000 Series Sulfur Purge		Commercial Chemical Product	R&F Industries, Inc.	250215-002	402 W Davis St Luling, TX 72486	Bending Operations			
H	275-gallon tote	2	2000 Series Sulfur		Commercial Chemical Product	R&F Industries, Inc.	250215-002	402 W Davis St Luling, TX 72486	Bending Operations			
C	275-gallon tote	5	Recycled Solvent		Commercial Chemical Product	R&F Industries, Inc.	250215-002	402 W Davis St Luling, TX 72486	Bending Operations			
H	275-gallon tote	1	Recycled Solvent		Commercial Chemical Product	R&F Industries, Inc.	250215-002	402 W Davis St Luling, TX 72486	Bending Operations			
H	275-gallon tote	2	Recycled Solvent		Commercial Chemical Product	R&F Industries, Inc.	250215-002	402 W Davis St Luling, TX 72486	Bending Operations			
A	275-gallon tote	6	Sulfuric Acid		Commercial Chemical Product	R&F Industries, Inc.	250215-001	402 W Davis St Luling, TX 72486	Bending Operations			
B	275-gallon tote	6	Sulfuric Acid		Commercial Chemical Product	R&F Industries, Inc.	250215-001	402 W Davis St Luling, TX 72486	Bending Operations			
F	55-gallon drum	1	Xylene		Commercial Chemical Product	R&F Industries, Inc.	250225-001	402 W Davis St Luling, TX 72486	Bending Operations			
TT20	Tanker Truck	1	Xylene		Commercial Chemical Product	R&F Industries, Inc.	250225-001	402 W Davis St Luling, TX 72486	Bending Operations			
C	55-gallon drum	1	Xammet(?)		Universal Hazardous Waste (Xylene)	Sound Resource Solutions LLC		731 FM 1127 Rd Shepherd, Texas 77371	Universal Hazardous Waste	Class 1		Hazardous Waste Landfill
C	55-gallon drum	1	Lauryl Alcohol	in overpack	Universal Waste	Sound Resource Solutions LLC		731 FM 1127 Rd Shepherd, Texas 77371	Universal Hazardous Waste	N/A		Hazardous Waste Landfill
C	24-gallon drum	1	Methanol	in overpack	Universal Hazardous Waste	Sound Resource Solutions LLC		731 FM 1127 Rd Shepherd, Texas 77371	Universal Hazardous Waste	Class 1		Hazardous Waste Landfill
F	Misc	?	Scrap containers		Solid Waste	Sound Resource Solutions LLC		731 FM 1127 Rd Shepherd, Texas 77371	Solid Waste			
C	55-gallon drum	2	Unknown	in overpack	Universal Hazardous Waste (Heptane)	Sound Resource Solutions LLC		731 FM 1127 Rd Shepherd, Texas 77371	Universal Hazardous Waste	Class 1		Hazardous Waste Landfill
F	275-gallon tote	8	Unknown	Possibly fire damaged	Solid Waste	Sound Resource Solutions LLC		731 FM 1127 Rd Shepherd, Texas 77371	Solid Waste			
C	55-gallon tote	1	Unknown (Flammable Liquid)	in overpack	Universal Hazardous Waste (Isopropanol)	Sound Resource Solutions LLC		731 FM 1127 Rd Shepherd, Texas 77371	Universal Hazardous Waste	Class 1		Hazardous Waste Landfill
A	275-gallon drum	2	Water		Commercial Chemical Product	Sound Resource Solutions LLC		731 FM 1127 Rd Shepherd, Texas 77371	Regular Cleaning			
D	275-gallon tote	1	Water		Commercial Chemical Product	Sound Resource Solutions LLC		731 FM 1127 Rd Shepherd, Texas 77371	Regular Cleaning			
F	275-gallon tote	1	Water		Commercial Chemical Product	Sound Resource Solutions LLC		731 FM 1127 Rd Shepherd, Texas 77371	Regular Cleaning			
C	55-gallon drum	1	Zip Brake wash (Heptane)		Universal Hazardous Waste (Heptane)	Sound Resource Solutions LLC		731 FM 1127 Rd Shepherd, Texas 77371	Universal Hazardous Waste	Class 1		Hazardous Waste Landfill

Appendix 4

Container Shipping
Records as of March 5,
2025

B/L: 021225-14

Bill of Lading

Carrier Name: The Cashion Co. ATTN: Dispatch
Pickup Date: 2/12/25 (Wednesday) @ AM

MRC PO #: 19658-0225

From: R&F Industries c/o Sound Resource Solutions
Address: 731 FM 1127 Road
Shepherd, Texas 77371
(214) 405-9641 ph.

TO: Montgomery-Rinehardt Corp.
Address: 2435 Plantation Center Dr.
Matthews, NC 28105
(704) 545-0190 ph.
Contact: John Turner

SPECIAL INSTRUCTIONS:

Material will load from totes

RATE QUOTED:

N/A

FOR PAYMENT, SEND BILL TO:

Montgomery-Rinehardt Corp.

SHIPPERS INTERNAL DATA:

WEIGHT	UNIT	HM	PRODUCT, KIND OF PACKAGING SPECIAL MARKS, ETC.
--------	------	----	--

12,315 lbs.
(Net Wt.)

T/T,1 X UN 1219, Isopropanol 3, PG II

"FLAMMABLE LIQUID"

Emergency Contact: Chemtrec (800) 424-9300-CCN693554
Emergency Response Guide: 129

Kellie H.

- Shipment Coordinator- 2-12-25

Bill Ham

SRS Shipping Signature

Cashion Driver Signature

SHIPPER'S CERTIFICATION: This is to certify that the above-named materials are properly classified, described, packaged, marked and labeled and are in proper condition for transportation according to the applicable regulations of the Department of Transportation. (Signature/Title)

2/12/25

Bill of Lading

B/L: 030525-14

Carrier Name: **ATTN: Dispatch**
 Pickup Date: **3/5/25 (Wednesday) @ AM**

MRC PO #: 19712-0325

From: R&F Industries c/o Sound Resource Solutions
 Address: 731 FM 1127 Road
 Shepherd, Texas 77371
 (214) 405-9641 ph.

TO: Montgomery-Rinehardt Corp.
 Address: 2435 Plantation Center Dr.
 Matthews, NC 28105
 (704) 545-0190 ph.
 Contact: John Turner

SPECIAL INSTRUCTIONS:

RATE QUOTED:

n/a

FOR PAYMENT, SEND BILL TO:
 Corviva dba Express Logistics, Inc.
 4651 121st St.
 Urbandale, IA 50323

SHIPPERS INTERNAL DATA:

WEIGHT	UNIT	HM	PRODUCT, KIND OF PACKAGING SPECIAL MARKS, ETC.
38,250 lbs.	Tote, 1	X	UN 1219, Isopropanol Solution, 3, II
(Gross Wt.)			18 x 1,900 lb. net weight totes of IPA 80%
			"FLAMMABLE LIQUID"
			Emergency Contact: Chemtrec (800) 424-9300—CCN693554
			Emergency Response Guide: 129

Kyle R. Shipment Coordinator
 3-5-25

John R.

SRS Shipping Signature

Pickup Driver Signature

SHIPPER'S CERTIFICATION: This is to certify that the above-named materials are properly classified, described, packaged, marked and labeled and are in proper condition for transportation according to the applicable regulations of the Department of Transportation. (Signature/Title)

SHIP FROM

Bill of Lading Number: 250218-002

SOUND RESOURCES SOLUTIONS
731 FM 1127 ROAD
SHEPHERD, TX 77371

BAR CODE SPACE

SHIP TO

Carrier Name:/Pick up Time

R & F INDUSTRIES, INC
402 W DAVIS STREET
LULING, TX 78648 830-875-6927

Trailer:
Tractor:

THIRD PARTY FREIGHT CHARGES BILL TO

SCAC:

BAR CODE SPACE

Special Instructions:

Freight Charge Terms (Freight charges are prepaid unless marked otherwise):

Prepaid X Collect 3rd Party

Phone: 832-469-7584

CUSTOMER ORDER INFORMATION

Customer Order No.

of Packages

Weight

Pallet/Slip
(circle one)

Additional Shipper Information

Dry Van

12

32,000

Y N
Y N
Y N
Y N

Grand Total

CARRIER INFORMATION

Handling Unit		Package		Weight	HM (X)	Commodity Description Commodities requiring special or additional care or attention in handling or stowing must be so marked and packaged as to ensure safe transportation with ordinary care. See Section 2(e) of NMFC item 360	LTL Only	
Qty	Type	Qty	Type				NMFC No.	Class
2	T330	2	Tote	8492	(X)	UN 1823, Sodium Hydroxide, 8, II		
1	T330	1	Tote	2560	(X)	UN 3082, Environmentally hazardous substances, liquid n.o.s. (Nonylphenol, Ethoxylated), 9, III		
6	T330	6	Tote	14,640	(X)	UN 1263, Paint Related Material, 3, II (Solvent Wash)		
1	T330	1	Tote	2640	(X)	UN 1350, Sulphur, 4.1, III		
1	T330	.5	Tote	1540	(X)	UN 1989, Aldehydes. NOS 3, II		
1	T330	1	Tote	2098	(X)	UN 1219, Isopropanol, 3, II		
1		12		32,000		Pounds		

Note: Liability limitation for loss or damage in this shipment may be applicable. See 49 USC § 14706(c)(1)(A) and (B).

Received, subject to individually determined rates or contracts that have been agreed upon in writing between the carrier and shipper, if applicable, otherwise to the rates, classifications, and rules that have been established by the carrier and are available to the shipper, on request, and to all applicable state and federal regulations.

**Hazardous Materials Emergency Phone
Number: 1-800-424-9300**

Shipper Signature/Date

Trailer Loaded:

☒ By shipper
By driver

Freight Counted:

☒ By shipper
☐ By driver/pallets said to contain
☐ By driver/pieces

Carrier Signature/Pickup Date

This is to certify that the above named materials are properly classified, packaged, marked, and labeled, and are in proper condition for transportation according to the applicable regulations of the DOT.

Carrier acknowledges receipt of packages and required placards. Carrier certifies emergency response information was made available and/or carrier has the DOT emergency response guidebook or equivalent documentation in the vehicle. Property described above is received in good order, except as noted.

Maris Grubbs 02-18-2025

Date 2/14/2025

UNIFORM STRAIGHT BILL OF LADING – NOT NEGOTIABLE

Page 1

SHIP FROM

SOUND RESOURCES SOLUTIONS
731 FM 1127 ROAD
SHEPHERD, TX 77371

Bill of Lading Number: 250219-001

SHIP TO

R & F INDUSTRIES, INC
402 W DAVIS STREET
LULING, TX 78648 830-875-6927

Carrier Name:/Pick up Time

Trailer:

Tractor:

THIRD PARTY FREIGHT CHARGES BILL TO

SCAC:

PART CARRIER SPACE

PART CARRIER SPACE

Special Instructions:

Freight Charge Terms (Freight charges are prepaid unless marked otherwise):

Prepaid X Collect 3rd Party

Phone: 832-469-7584

CUSTOMER ORDER INFORMATION

Customer Order No.

of Packages

Weight

Pallet/Slip
(circle one)

Additional Shipper Information

Dry Van

12

42,865

Y

N

Y

N

Y

N

Y

N

Grand Total

CARRIER INFORMATION

Handling Unit

Package

Qty Type Qty Type Weight HM (X)

Commodity Description

Commodities requiring special or additional care or attention in handling or stowing must be so marked and packaged as to ensure safe transportation with ordinary care. See Section 2(e) of NMFC item 360.

LTL Only

NMFC No.

Class

6	Drums	6	Drums	3,900	(X)	UN 1830 Sulfuric Acid, 8, II		
7	T330	7	Totes	27,293	(X)	UN 1830 Sulfuric Acid, 8, II		
3	T330	3	Totes	2,620	(X)	UN 1830 Sulfuric Acid, 8, II (Acid Wash Totes)		
7	Drums	7	Drums	560		Overpack Drums / Spill Kits		
2	T330	2	Totes	8,492	(X)	UN 1823, Sodium Hydroxide, 8, II		
16		16		42,865		Pounds		



Note: Liability limitation for loss or damage in this shipment may be applicable. See 49 USC § 14706(c)(1)(A) and (B).

Received. Subject to individually determined rates or contracts that have been agreed upon in writing between the carrier and shipper, if applicable, otherwise to the rates, classifications, and rules that have been established by the carrier and are available to the shipper, on request, and to all applicable state and federal regulations.

**Hazardous Materials Emergency Phone
Number: 1-800-424-9300**

Shipper Signature/Date

8/2/2025 11:23 AM
This is to certify that the above named materials are properly classified, packaged, marked, and labeled, and are in proper condition for transportation according to the applicable regulations of the DOT.

Trailer Loaded:

☒ By shipper
☐ By driver

Freight Counted:

☒ By shipper
☐ By driver/pallets said to contain
☐ By driver/pieces

Carrier Signature/Pickup Date

Carrier acknowledges receipt of packages and required placards. Carrier certifies emergency response information was made available and/or carrier has the DOT emergency response guidebook or equivalent documentation in the vehicle. Property described above is received in good order, except as noted.

Date 2/25/2025

UNIFORM STRAIGHT BILL OF LADING – NOT NEGOTIABLE

Page 1

SHIP FROM

SOUND RESOURCES SOLUTIONS
731 FM 1127 ROAD
SHEPHERD, TX 77371

Bill of Lading Number: 250226-001

SHIP TO

R & F INDUSTRIES, INC
402 W DAVIS STREET
LULING, TX 78648 830-875-6927

Carrier Name:/Pick up Time

Trailer:

Tractor:

THIRD PARTY FREIGHT CHARGES BILL TO

SCAC:

Special Instructions:

Freight Charge Terms (Freight charges are prepaid unless marked otherwise):

Prepaid X Collect 3rd Party

Phone: 832-469-7584

CUSTOMER ORDER INFORMATION

Customer Order No.

of Packages

Weight

Pallet/Slip
(circle one)

Additional Shipper Information

Dry Van

18

37,620

Y

N

Y

N

Y

N

Y

N

Grand Total

CARRIER INFORMATION

Handling Unit

Package

LTL Only

Qty	Type	Qty	Type	Weight	HM (X)	Commodity Description	NMFC No.	Class
18	Totes	18	Tote	2090	(X)	UN 1307, XYLENES, 3, PG III, RQ		

Commodities requiring special or additional care or attention in handling or stowing must be so marked and packaged as to ensure safe transportation with ordinary care. See Section 2(e) of NMFC item 360.

18

37,620

Pounds

Note: Liability limitation for loss or damage in this shipment may be applicable. See 49 USC § 14706(c)(1)(A) and (B).

Received, subject to individually determined rates or contracts that have been agreed upon in writing between the carrier and shipper, if applicable, otherwise to the rates, classifications, and rules that have been established by the carrier and are available to the shipper, on request, and to all applicable state and federal regulations.

Shipper Signature/Date

Trailer Loaded:

☒ By shipper

By driver

Freight Counted:

☒ By shipper☐ By driver/pallets said to contain☐ By driver/pieces

Carrier Signature/Pickup Date

Carrier acknowledges receipt of packages and required placards. Carrier certifies emergency response information was made available and/or carrier has the DOT emergency response guidebook or equivalent documentation in the vehicle. Property described above is received in good order, except as noted.

This is to certify that the above named materials are properly classified, packaged, marked, and labeled, and are in proper condition for transportation according to the applicable regulations of the DOT.

**Hazardous Materials Emergency Phone
Number: 1-800-424-9300**

1122150

Date 2/13/2025

UNIFORM STRAIGHT BILL OF LADING – NOT NEGOTIABLE

Page 1

SHIP FROM		Bill of Lading Number: 251305-001	
Sound Resource Solutions 731 FM 1127 Rd Shepherd, TX 77371		BAR CODE SPACE	
SHIP TO		Carrier Name:/Pick up Time	
Lonestar Industries 2524 South Sprigg St. Cape Girardeau, MO 63703		Sound Resource Solutions Logistics 7-8am Trailer: 36 Tractor: 1754 B.T.I.	
THIRD PARTY FREIGHT CHARGES BILL TO		SCAC:	
		BAR CODE SPACE	
Special Instructions: TW522		Freight Charge Terms (Freight charges are prepaid unless marked otherwise): Prepaid X Collect 3rd Party	
Phone: 573-335-8878			

CUSTOMER ORDER INFORMATION

Customer Order No.	# of Packages	Weight	Pallet/Slip (circle one)		Additional Shipper Information
TANKER			Y		
			Y	N	
			Y	N	
			Y	N	
Grand Total					

CARRIER INFORMATION

Handling Unit		Package					LTL Only	
Qty	Type	Qty	Type	Weight	HM (X)	Commodity Description	NMFC No.	Class
						Commodities requiring special or additional care or attention in handling or stowing must be so marked and packaged as to ensure safe transportation with ordinary care. See Section 2(e) of NMFC item 360		
1	TT	7000	P	45,000	(X)	UN 1993, FLAMMABLE LIQUID NOX, 3, PG II		
						SRS VA-150		
1		7000		45,000		Pounds		

Note: Liability limitation for loss or damage in this shipment may be applicable. See 49 USC § 14706(c)(1)(A) and (B).

Received, subject to individually determined rates or contracts that have been agreed upon in writing between the carrier and shipper, if applicable, otherwise to the rates, classifications, and rules that have been established by the carrier and are available to the shipper, on request, and to all applicable state and federal regulations.

Hazardous Materials Emergency Phone Number: 1-800-424-9300

Shipper Signature/Date

This is to certify that the above named materials are properly classified, packaged, marked, and labeled, and are in proper condition for transportation according to the applicable regulations of the DOT.

Trailer Loaded:

☒ By shipper
By driver

Freight Counted:

☒ By shipper
☐ By driver/pallets said to contain
☐ By driver/pieces

Carrier Signature/Pickup Date

Carrier acknowledges receipt of packages and required placards. Carrier certifies emergency response information was made available and/or carrier has the DOT emergency response guidebook or equivalent documentation in the vehicle. Property described above is received in good order, except as noted.

Brund LLC

2/14/25

Load Number: LC1122150

Load Date: 2/14/2025

Print Date: 2/17/2025

Generator Information

Generator: **SOUND RESOURCE SOLUTIONS**

Manifest No: **251305-001**

Profile: TW2522

Address: 731 FM 1127

SHEPARD, TX 77371

Telephone: (214) 405-9641

Contact: GEOFF HARFIELD

Transporter Information

Name: SOUND RESOURCE LOGISTICS

Address:

Telephone:

Contact:

Driver: NOT LEGIBLE

Trailer #: 36

Time Arrived: 9:10 AM

Time Spotted: 9:15 AM

Time Left Plant: 11:04 AM

Load Information

Manifest Quantity: 45,000 Pounds

Unloaded Quantity: 31,660 Pounds (5,557 Gallons)

PO Number:

Reference:

Sludge Volume: 0 Pounds After Unloading

Agitate Load: No

Truck Washed: No

Able to Backflush: No

Excessive Cleaning: No

Volume

Gross Weight: 64,220

Tare Weight: 32,560

Net Weight: 31,660

Tonnage: 15.83

Laboratory Information

Sample Number: 2501315

Tank Compatibility: Yes

BTU/lb: 18,898

Moisture: 0.55 %

Chlorine: 0.05 %

Sulfur: 0.55 %

Density: 5.70 lb/gal

pH: 3.54

Mercury: N/A

Comments

VISUALLY EMPTY

Operators' Signatures:

See Comments section above

Transporter's Signature:

Date Completed:



Cape Girardeau Alternative Fuels
P.O. Box 968 Cape Girardeau, MO 63702
573-335-2083

Certificate of Reuse

Generator: SOUND RESOURCE SOLUTIONS
Address: 731 FM 1127
SHEPARD, TX 77371

Pounds Received: 31,660

We have received and reused material from SOUND RESOURCE SOLUTIONS identified as follows:

Manifest Number: 251305-001	Our Reference Load Number: LC1122150	Profile Number: TW2522
---------------------------------------	--	----------------------------------

**And hereby certifies that this material was subsequently destroyed in
accordance with the requirements of 40 CFR 268.42 on or about 02/14/2025**

Title: Facility Manager

Signed: *Bradley T Meyr*

Date: Friday, February 14, 2025



BUZZI UNICEM USA, CAPE GIRARDEAU PLANT

Cape Girardeau Alternative Fuels

23121 NETWORK PLACE

CHICAGO, IL 60673-1231

PHONE: 573-335-2083

FAX: 573-335-1119

Invoice No: 251912

Date: 2/17/25

SOUND RESOURCE SOLUTIONS
731 FM 1127 ROAD
SHEPERD, TX 77371

Attn:

Email: gharfield@soundrs.net

Terms: Net 30 days

Due Date: 3/19/2025

FOR THERMAL DESTRUCTION SERVICES AT CAPE GIRARDEAU ALTERNATIVE FUELS

Generator: SOUND RESOURCE SOLUTIONS

Load Number: LC1122150

Rec'd Date: 2/14/2025

Profile(s): TW2522

Manifest(s): 251305-001

BTUs/lb:

18,898

% CL:

0.05

% Moisture:

0.55

Quantity	Description	Unit Price	Discount	Extended Amount
31,660	Pounds Received	\$0.00		\$0.00
1	Minimum Load Charge	\$750.00		\$750.00
Load SubTotal:				\$750.00

SOUND RESOURCE SOLUTIONS SubTotal:

\$750.00

Grand Total:

\$750.00

You can now view/print your manifest from the EPA's E-Manifest website:
<https://rcrainfo.epa.gov/rcrainfoprod/action/secured/login>

1122072

Date 2/5/2025

UNIFORM STRAIGHT BILL OF LADING – NOT NEGOTIABLE

Page 1

SHIP FROM		Bill of Lading Number: 250205-001	
Sound Resource Solutions 731 FM 1127 Rd Shepherd, TX 77371		BAR CODE SPACE	
SHIP TO		Carrier Name:/Pick up Time	
Lonestar Industries 2524 South Sprigg St. Cape Girardeau, MO 63703		Sound Resource Solutions Logistics 7-8am Trailer: Tractor:	
THIRD PARTY FREIGHT CHARGES BILL TO		SCAC:	
		BAR CODE SPACE	
Special Instructions: TW2522		Freight Charge Terms (Freight charges are prepaid unless marked otherwise):	
Phone: 573-335-8878		Prepaid X Collect 3rd Party	

CUSTOMER ORDER INFORMATION

Customer Order No.	# of Packages	Weight	Pallet/Slip (circle one)	Additional Shipper Information
TANKER			Y	
			Y N	
			Y N	
			Y N	
Grand Total				

CARRIER INFORMATION

Handling Unit		Package					LTL Only	
Qty	Type	Qty	Type	Weight	HM (X)	Commodity Description Commodities requiring special or additional care or attention in handling or stowing must be so marked and packaged as to ensure safe transportation with ordinary care. See Section 2(e) of NMFC item 360	NMFC No.	Class
1	TT	7000	P	45,000	(X)	UN 1993, FLAMMABLE LIQUID NOX, 3, PG II		
						SRS VA-150		
1		7000		45,000		Pounds		

Note: Liability limitation for loss or damage in this shipment may be applicable. See 49 USC § 14706(c)(1)(A) and (B).

Received, subject to individually determined rates or contracts that have been agreed upon in writing between the carrier and shipper, if applicable, otherwise to the rates, classifications, and rules that have been established by the carrier and are available to the shipper, on request, and to all applicable state and federal regulations.

Hazardous Materials Emergency Phone Number: 1-800-424-9300

Shipper Signature/Date

John
This is to certify that the above named materials are properly classified, packaged, marked, and labeled, and are in proper condition for transportation according to the applicable regulations of the DOT.

Trailer Loaded:

☒ By shipper
☐ By driver

Freight Counted:

☒ By shipper
☐ By driver/pallets said to contain
☐ By driver/pieces

Carrier Signature/Pickup Date

ASL 2/10/25
Carrier acknowledges receipt of packages and required placards. Carrier certifies emergency response information was made available and/or carrier has the DOT emergency response guidebook or equivalent documentation in the vehicle. Property described above is received in good order, except as noted.

John 1754 Monday 8 Am



Buzzi Unicem USA

Cape Girardeau Alternative Fuels
P.O. Box 968
Cape Girardeau, MO 63702
(573) 335-2083

Liquid Load Report

Load Number: LC1122072

Load Date: 2/11/2025

Print Date: 2/12/2025

Generator Information

Generator: **SOUND RESOURCE SOLUTIONS**

Manifest No: **250205001**

Profile: TW2522

Address: 731 FM 1127

SHEPARD, TX 77371

Telephone: (214) 405-9641

Contact: GEOFF HARFIELD

Transporter Information

Name: SOUND RESOURCE LOGISTICS

Address:

Telephone:

Contact:

Driver: J CLARK

Trailer #:

Time Arrived: 8:30 AM

Time Spotted: 10:00 AM

Time Left Plant: 10:41 AM

Load Information

Manifest Quantity: 45,000 Pounds

Unloaded Quantity: 43,440 Pounds (6,442 Gallons)

PO Number:

Reference:

Sludge Volume: 0 Pounds After Unloading

Agitate Load: No

Truck Washed: No

Able to Backflush: No

Excessive Cleaning: No

Volume

Gross Weight: 75,540

Tare Weight: 32,100

Net Weight: 43,440

Tonnage: 21.72

Laboratory Information

Sample Number: 2501179

Tank Compatibility: Yes

BTU/lb: 18,003

Moisture: 2.35 %

Chlorine: 0.33 %

Sulfur: 0.05 %

Density: 6.74 lb/gal

pH: 5.86

Mercury: N/A

Comments

VISSUALLY EMPTY

Operators' Signatures:

See Comments section above

Transporter's Signature:

Date Completed:



Cape Girardeau Alternative Fuels
P.O. Box 968 Cape Girardeau, MO 63702
573-335-2083

Certificate of Reuse

Generator: SOUND RESOURCE SOLUTIONS
Address: 731 FM 1127
SHEPARD, TX 77371

Pounds Received: 43,440

We have received and reused material from SOUND RESOURCE SOLUTIONS identified as follows:

Manifest Number: 250205001	Our Reference Load Number: LC1122072	Profile Number: TW2522
--------------------------------------	--	----------------------------------

**And hereby certifies that this material was subsequently destroyed in
accordance with the requirements of 40 CFR 268.42 on or about 02/11/2025**

Title: Facility Manager

Signed: *Bradley T Meyr*

Date: Tuesday, February 11, 2025



BUZZI UNICEM USA, CAPE GIRARDEAU PLANT

Cape Girardeau Alternative Fuels

23121 NETWORK PLACE

CHICAGO, IL 60673-1231

PHONE: 573-335-2083

FAX: 573-335-1119

Invoice No: 251816

Date: 2/12/25

SOUND RESOURCE SOLUTIONS
731 FM 1127 ROAD
SHEPERD, TX 77371

Attn:

Email: gharfield@soundrs.net

Terms: Net 30 days

Due Date: 3/14/2025

FOR THERMAL DESTRUCTION SERVICES AT CAPE GIRARDEAU ALTERNATIVE FUELS

Generator: SOUND RESOURCE SOLUTIONS

Load Number: LC1122072

Rec'd Date: 2/11/2025

Profile(s): TW2522

Manifest(s): 250205001

BTUs/lb:

18,003

% CL:

0.33

% Moisture:

2.35

Quantity	Description	Unit Price	Discount	Extended Amount
43,440	Pounds Received	\$0.0236		\$1,025.18
Load SubTotal:				\$1,025.18
SOUND RESOURCE SOLUTIONS SubTotal:				\$1,025.18

Grand Total:

\$1,025.18

You can now view/print your manifest from the EPA's E-Manifest website:
<https://rcrainfo.epa.gov/rcrainfoprod/action/secured/login>

Appendix 5

Daily Inspection
Summary and Follow-up
Request

From: [Penland, John](#)
To: thomasm@soundrs.net
Cc: [Pandak, Debra](#)
Subject: Daily Summary - USEPA Region 6 RCRA Inspection - Sound Resource Solutions - Shepherd, TX (TXR000079927)
- February 6, 2025
Date: Thursday, February 6, 2025 10:01:00 PM

All,

Here is a summary of my notes from today's inspection. If there are any errors or omissions, please let me know.

Introduction

On February 6, 2025, I, John Penland, will be conducted an unannounced inspection of the Sound Resource Solutions (SRS) facility located at 731 FM 1127 in Shepherd, Texas, for compliance with the Resource Conservation and Recovery Act (RCRA). The inspection included a walkthrough of the facility and will continue with a review of records following this onsite portion.

Purpose

The SRS facility was selected for inspection to evaluate the continuing operations at the facility following the November 2023 fire.

Inspection Attendees

Name	Title	Representing	Phone	Email
John Penland	Lead Hazardous Waste Inspector	US EPA Region 6	214-665-9717	Penland.john@epa.gov
Thomas Mwagni	Owner	Sound Resource Solutions		thomasm@soundrs.net
Greg	General Manager	R & F Industries – Luling, TX	830-445-1375	
Stu McBride	Environmental Consultant	Ridgeline Engineering, LLC.		
Kyle Marcantel	Material Handler	Sound Resource Solutions		

Daily Summary

Initial Entry to the facility - approximately 9:00am

I presented my credentials to Mr. Kyle Marcantel and informed him that I was there to conduct an inspection of the facility under the authority of section 3007 of the Resource Conservation and Recovery Act (RCRA). Mr. Marcantel informed me that the facility had ceased production prior to January 10, 2025. He was the only current employee at the facility and in a caretaker position. Following this introduction, I requested he contact relevant management or ownership to inform them of this inspection. Mr. Marcantel contacted the general manager of R&F Industries in Luling, TX and the SRS owner.

RCRA Section 3007

For purposes of developing or assisting in the development of any regulation or enforcing the provisions of this chapter, any person who generates, stores, treats, transports, disposes of, or otherwise handles or has handled hazardous wastes shall, upon request of any officer, employee or representative of the Environmental Protection Agency, duly designated by the Administrator, or upon request of any duly designated officer, employee or representative of a State having an authorized hazardous waste program, furnish information relating to such wastes and permit such person at all reasonable times to have access to, and to copy all records relating to such wastes. For the purposes of developing or assisting in the development of any regulation or enforcing the provisions of this chapter, such officers, employees or representatives are authorized—

(1) to enter at reasonable times any establishment or other place where hazardous wastes are or have been generated, stored, treated, disposed of, or transported from;

(2) to inspect and obtain samples from any person of any such wastes and samples of any containers or labeling for such wastes.

SRS has the right to assert a Confidential Business Information claim for records requested by EPA (see attachment).

Process for transferring electronic records – EPA has set up a Microsoft OneDrive folder with access restricted to the inspection participants.

Facility Description

SRS is in the process of ceasing operations as a business. The facility occupies 30 acres located at 731 FM 1127 in Shepherd, Texas. The facility currently only has one employee onsite as it unwinds its operations. The November 2023 fire destroyed all structures and operating equipment on the property. Since the fire, SRS began solvent blending operations using portable tanks but this operation ceased prior to January 10, 2025. Raw materials, production wastes, and some unsold product remain stored in containers onsite. In addition, some debris

and materials impacted by the fire remain at the facility. The facility remains unsecured with uncontrolled pedestrian access and only one person present during normal business hours.

The site is registered as a very small quantity generator with the EPAID: TXR000079927.

Facility Walkthrough

Beginning at approximately 9:30am

Accompanied by Kyle Marcantel, I took an inventory of containers and waste piles located on the site. This inventory was documented using a hand-drawn map, photographs, and a written inventory using the labels and Mr. Marcantel's knowledge to determine the contents of the containers. Copies of the map and inventory are scanned into shared OneDrive Folder.

Follow-up information requested

The definition of solid waste codified at 40 CFR 261.2 includes storage in anticipation of or in-lieu of disposal. Since the facility has ceased manufacture of its products, it is currently engaged in storage of the various chemicals present on the site at the time of this inspection with no anticipated onsite use. Therefore, for each container or material onsite, I am requesting:

1. A determination of whether that material will be managed as a solid or hazardous waste or as a commercial chemical product.
2. For each material determined to be a waste, what are the EPA and State waste codes that apply to that waste and what will be the anticipated means of disposal?
3. For each material determined to be a product, who will be taking possession of the material and what is its anticipated use?

I will be transcribing my handwritten inventory into a spreadsheet and will email it separately.

Departed Facility at approximately 12:15pm

From: [Penland, John](#)
To: thomasm@soundrs.net
Cc: [John Shelton](#); [Pandak, Debra](#)
Subject: USEPA Region 6 RCRA Inspection - Sound Resource Solutions - Shepherd, TX (TXR000079927) - February 6, 2025
Date: Monday, February 24, 2025 10:48:00 AM
Attachments: [SRS Site inspection inventory.xlsx](#)

Following up from my inspection of the Sound Resource Solutions facility in Shepherd, TX, please find attached an inventory of chemicals present onsite at the time of this inspection. This inventory is based on my notes at the time of the inspection and may not be complete.

Please use this inventory to respond to my request for additional information.

For each container or material onsite, I am requesting:

1. A determination of whether that material will be managed as a solid or hazardous waste or as a commercial chemical product.
2. For each material determined to be a waste, what are the EPA and State waste codes that apply to that waste and what will be the anticipated means of disposal?
3. For each material determined to be a product, who will be taking possession of the material and what is its anticipated use?

I will be in touch shortly to discuss this request.

Thank you,

John Penland
Sr. Environmental Scientist
Enforcement and Compliance Assurance Division (ECAD)
United States Environmental Protection Agency – Region 6
1201 Elm Street, Suite 500, Dallas, TX 75270
214-665-9717
Penland.john@epa.gov

Appendix 6

Notice of Registration
for Sound Resource
Solutions, LLC. as of
February 6, 2025

88918 SOUND RESOURCE SOLUTIONS

Solid Waste Registration Number: 88918 EPA Id: TXR000079927

Company Name: SOUND RESOURCE SOLUTIONS LLC

Site Name: SOUND RESOURCE SOLUTIONS

Site Location: 731 FM 1127 RD SHEPHERD TX

Primary Contact: HARFIELD, GEOFF

Mailing Address: 731 FM 1127 RD

Region: 10

County: 204 SAN JACINTO

Land Type: Private

Title: OWNER

Site Street Address: 731 FM 1127 RD

SHEPHERD, TX 77371-7037

SHEPHERD, TX 77371

Registration Status:

Registration Type: Generat

Generator Type: Industrial

Receiver Type:

Transporter Type:

Transport West Class:

Reporting Method: STEERS

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): No

Type(s) Managed:

Destination Facility for Universal Waste: No

NAICS Code: 484220 Specialized Freight (except Used Goods) Trucking,

Tax Identification #: 12754826431

Handler Status:

Operator Information

Name: SOUND RESOURCE SOLUTIONS LLC

Phone: 214-405-9641

Address: 731 FM 1127 RD

SHEPHERD, TX 77371-7037

Owner Information:

Name: SOUND RESOURCE SOLUTIONS LLC

Phone: 214-405-9641

Address: 731 FM 1127 RD

SHEPHERD, TX 77371-7037

Other Contact: Manager, Environmental

Mailing Address: 731 FM 1127 RD

SHEPHERD, TX 77371-7037

Role: IHW: Owner Contact

Phone: 214-405-9641

As of 05/02/2024 -

The next unassigned sequence number for WASTES is 0101 and

The next unassigned sequence number for UNITS is 006

Industrial and Hazardous Waste

Texas Waste Code	Waste Class	Status	Date of Status	Managed Onsite/ Offsite	Radio-active	TCEQ Audit Complete
***** Active Wastes *****						
00082191	1	Active	05/02/2024	On-site	No	No
Description from Generator: NH Organic Liquids NOC for disposal Texas Form Code: 219 Other organic liquids Origin Code: 1 Generated on-site from a product process or service activity Company's Internal Code(s): NH ORGANIC LIQUIDS Current Management Units: Container storage area 001						
00094091	1	Active	05/02/2024	On-site	No	No
Description from Generator: Debris contaminated with Polymers/organic liquids Texas Form Code: 409 Other non-halogenated organic solids Origin Code: 1 Generated on-site from a product process or service activity Company's Internal Code(s): NH IMPACTED DEBRIS Current Management Units: Container storage area 001						
0010110H	H	Active	05/02/2024	On-site	No	No
Description from Generator: Aqua Ammonia (Out of spec/out of date); Related to Episodic Event Texas Form Code: 110 Caustic aqueous waste EPA Form Code: W119 Other inorganic liquid Origin Code: 4 Received from off-site and was not recycled or treated on-site Source Code: G11 Discarding off-specification or out-of-date chemicals or products NAICS Code: 425120 Wholesale Trade Agents and Brokers Company's Internal Code(s): AQUA AMMONIA EPA Hazardous Waste Numbers: D002 Current Management Units: Container storage area 004						
0011212H	H	Active	05/02/2024	On-site	No	No
Description from Generator: Styrene (out of date/off spec); Related to Episodic Event Texas Form Code: 212 Reactive or polymerizable organic liquids EPA Form Code: W219 Other organic liquid Origin Code: 4 Received from off-site and was not recycled or treated on-site Source Code: G11 Discarding off-specification or out-of-date chemicals or products NAICS Code: 425120 Wholesale Trade Agents and Brokers Company's Internal Code(s): STYRENE EPA Hazardous Waste Numbers: D001 Current Management Units: Container storage area 004						

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

88918

SOUND RESOURCE SOLUTIONS

Texas Waste Code	Waste Class	Status	Date of Status	Managed Onsite/ Offsite	Radio-active	TCEQ Audit Complete
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***** Active Wastes *****

00121011	1	Active	05/02/2024	On-site	No	No
Description from Generator: Water from fire fighting activities and rain						
Texas Form Code: 101 Aqueous waste with low solvents						
Origin Code: 2 Result of spill clean-up, equipment decommissioning or emergency removal						
Company's Internal Code(s): FIRE WATER						
Current Management Units: Surface impoundment 005						

00133011	1	Active	05/02/2024	On-site	No	No
Description from Generator: Misc. Asphalt, and small metal bits						
Texas Form Code: 301 Soil contaminated with organics						
Origin Code: 1 Generated on-site from a product process or service activity						
Company's Internal Code(s): ASPHALT WASTE						
Current Management Units: Container storage area 003						

0100101H	H	Active	05/02/2024	On-site	No	No
Description from Generator: Firefighting waste water						
Texas Form Code: 101 Aqueous waste with low solvents						
EPA Form Code: W101 Very dilute aqueous waste containing more than 99% water						
Origin Code: 2 Result of spill clean-up, equipment decommissioning or emergency removal						
Source Code: G32 Cleanup of spill residues						
NAICS Code: 484220 Specialized Freight (except Used Goods) Trucking,						
Company's Internal Code(s): FIREFIGHTING WATER						
EPA Hazardous Waste Numbers: U039						
Current Management Units: Surface impoundment 005						

Notice of Registration Industrial and Hazardous Waste

Texas Waste Code	Waste Class	Status	Date of Status	Managed Onsite/ Offsite	Radio-active	TCEQ Audit Complete
** No Longer Generated Wastes **						
00014891	1	Inactive	05/02/2024	No	No	No
Description from Generator: CLEAN UP MATERIALS, MAINLY OIL-SOAKED CLAY, OR FLOR-DOI, FROM SMALL OIL RELEASES TO CONCRETE, OILY RAGS, OILY DEBRIS 10/08/2009						
Texas Form Code: 489 Petroleum contaminated solids						
Origin Code: 1 Generated on-site from a product process or service activity						
Current Management Units: None						
00026031	1	Inactive	05/02/2024	No	No	No
Description from Generator: OILY SLUDGE FROM PROCESS EQUIPMENT AND STORAGE TANKS. 10/08/2009						
Texas Form Code: 603 Oily sludge						
Origin Code: 1 Generated on-site from a product process or service activity						
Current Management Units: None						
00033101	1	Inactive	05/02/2024	No	No	No
Description from Generator: SPENT FILTERS AND FILTER MEDIA FROM PROCESS UNITS 10/08/2009						
Texas Form Code: 310 Spent solid filters or adsorbents						
Origin Code: 1 Generated on-site from a product process or service activity						
Current Management Units: None						
00049992	2	Inactive	05/02/2024	No	No	No
Description from Generator: PLANT TRASH 10/08/2009						
Texas Form Code: 999 Class 2 plant trash						
Origin Code: 1 Generated on-site from a product process or service activity						
Current Management Units: None						
00052051	1	Inactive	05/02/2024	No	No	No
Description from Generator: WATER - OIL EMULSION MIXTURE 10/08/2009						
Texas Form Code: 205 Oil-water emulsion or mixture						
Origin Code: 1 Generated on-site from a product process or service activity						
Current Management Units: None						
0006209H	H	Inactive	05/02/2024	No	No	No
Description from Generator: PAINT RELATED WASTE 10/08/2009						
Texas Form Code: 209 Organic paint, ink, lacquer, or varnish						
EPA Form Code: W209 Paint, ink, lacquer, or varnish						
Origin Code: 1 Generated on-site from a product process or service activity						
Source Code: G06 Painting and coating						
NAICS Code: 425120 Wholesale Trade Agents and Brokers						
EPA Hazardous Waste Numbers: D001 D007 D035						
Current Management Units: None						

Date: 05/06/2024

Date: 05/06/2024

Date: 05/06/2024

Date: 05/06/2024

Date: 05/06/2024

88918

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	CLOSURE REQUEST	07/29/2013	1 / NA	NA	NA	13 RCRA Pmt Exempt - Accumulation Time	YES /
	Description from Company:	CONTAINER STORAGE AREA						
	System Types:	141 Storage, bulking, and/or transfer off site - no treatment/recovery, fuel blending or disposal at this site.						
	Wastes Currently Managed at Unit:	00082191 NH Organic Liquids NOC for disposal						
		00094091 Debris contaminated with Polymers/organic liquids						
	Wastes Previously Managed at Unit:	00014891	00026031	00033101	00052051	0006209H	0007211H	
002	Container storage area	CLOSURE REQUEST	07/29/2013	1 / NA	NA	NA	13 RCRA Pmt Exempt - Accumulation Time	YES /
	Description from Company:	ROLL-OFF BOX STORAGE AREA						
	System Types:	141 Storage, bulking, and/or transfer off site - no treatment/recovery, fuel blending or disposal at this site.						
	Wastes Previously Managed at Unit:	00014891	00026031	00033101	00052051	0006209H	0007211H	
003	Container storage area	CLOSURE REQUEST	07/29/2013	12 / NA	NA	NA	13 RCRA Pmt Exempt - Accumulation Time	YES /
	Description from Company:	TRASH DUMPSTER						
	System Types:	141 Storage, bulking, and/or transfer off site - no treatment/recovery, fuel blending or disposal at this site.						
	Wastes Currently Managed at Unit:	00133011 Misc. Asphalt, and small metal bits						
	Wastes Previously Managed at Unit:	00049992						
004	Container storage area	ACTIVE	06/09/2022	NA / H1	NA	NA	13 RCRA Pmt Exempt - Accumulation Time	YES /
	Description from Company:	Container Storage Area						
	System Types:	141 Storage, bulking, and/or transfer off site - no treatment/recovery, fuel blending or disposal at this site.						
	Wastes Currently Managed at Unit:	0010110H Aqua Ammonia (Out of spec/out of date); Related to Episodic Event						
		0011212H Styrene (out of date/off spec); Related to Episodic Event						
005	Surface impoundment	ACTIVE	11/15/2023	NA / H1	NA	NA	10 RCRA Permit exempt - Other	YES /
	Description from Company:	Surface pond for firefighting water						
	System Types:	134 Deepwell or underground injection (with or without treatment) 141 Storage, bulking, and/or transfer off site - no treatment/recovery, fuel blending or disposal at this site.						
	Wastes Currently Managed at Unit:	00121011 Water from fire fighting activities and rain						
		0100101H Firefighting waste water						

As of 05/02/2024, The next unassigned sequence number for UNITS is 006