



REGION 6
DALLAS, TX 75270

January 2, 2025

SENT BY ELECTRONIC MAIL: houstonoperation@att.net

Fernando Bugtong
Gulfcoast Waste Services LLC
1003 Manor St.
Houston, Texas 77015

Re: EXPEDITED SETTLEMENT OPPORTUNITY
Notice of Investigation Results under the Resource Conservation and Recovery Act
Gulfcoast Waste Services LLC, EPA ID Number TXR000078576;
Docket Number RCRA-06-2025-0907

Dear Mr. Bugtong,

Improperly managed hazardous waste poses a serious threat to human health and the environment. Through implementation of the authorities in the Resource Conservation and Recovery Act ("RCRA"), 42 U.S.C. §§ 6901 – 6992k, the United States Environmental Protection Agency ("EPA") regulates hazardous waste activities from the "cradle-to-grave." This includes the generation, transportation, treatment, storage, and disposal of hazardous waste.

On March 14, 2023, the EPA Region 6 conducted a Compliance Evaluation Inspection (CEI) at the Gulfcoast Waste Services facility located at 1003 Manor St., Houston, Texas 77015. EPA's review indicates Gulfcoast Waste Services failed to close a container holding Universal Waste pursuant to 40 CFR 273.13(d)(1), mark or label its containers of Universal Waste pursuant to 40 CFR 273.14(e), and did not demonstrate the length of time that the Universal Waste has been accumulated from the date it became a waste or was received pursuant to 40 CFR 273.15(c). The inspection report can be viewed at <https://www.epa.gov/tx/enforcement-compliance-assurance-documents-texas>.

The EPA encourages Gulfcoast Waste Services LLC to immediately review its compliance with the foregoing requirements and if Gulfcoast Waste Services LLC disputes these violations, provide a written explanation, along with any documentation to Ashley Pederson at pederson.ashley@epa.gov within 10 days of your receipt of this letter.

The EPA is committed to a fair and quick settlement of this matter. Section 3008 of RCRA, 42 U.S.C. § 6928, authorizes EPA to pursue civil penalties of up to \$87,885 per day for each violation. By this letter, the EPA is offering Gulfcoast Waste Services LLC with an opportunity to quickly resolve these violations through an expedited settlement process with a substantially reduced penalty of \$1,250.

Expedited Settlement Agreement Process

To take advantage of the expedited settlement process, Gulfcoast Waste Services LLC must comply with each of the following conditions within 30 days of your receipt of this letter:

1. Correct the violations by ensuring that all managed Universal Waste is in compliance with the applicable RCRA Universal Waste requirements.
2. Sign and return the attached Expedited Settlement Agreement. In signing the attached Agreement, Gulfcoast Waste Services LLC is certifying under penalty of law that: (a) the violations have been corrected; (b) the assessed penalty has been paid; and (c) Gulfcoast Waste Services LLC is waiving its opportunity for a hearing or an appeal concerning the violations.
3. Pay the assessed penalty of \$1,250. Provide payment, by cashier or certified check, or by alternate payment method described at <https://www.epa.gov/financial/makepayment> and provide a copy of the penalty payment with the return of the Agreement. The payment shall reference Docket No. RCRA-06-2025-0907, be made payable to the "United States Treasury" and sent to:

U.S. Environmental Protection Agency
Fines and Penalties
Cincinnati Finance Center
P.O. Box 979078
St. Louis, Missouri 63197-9000.
4. Send, by email, a pdf copy of the signed Agreement and a copy of the penalty payment to Ashley Pederson at pederson.ashley@epa.gov.

If Gulfcoast Waste Services LLC can demonstrate in writing that it is technically infeasible or impracticable to correct the violations within 30 days, upon request, the EPA, at its discretion, may grant an extension. Extension requests and the above demonstration must be made in writing no later than 10 days before the end of the initial 30-day compliance period. The request must clearly indicate whether Gulfcoast Waste Services LLC intends to take advantage of the expedited settlement agreement process. Any extensions must be granted in writing by EPA.

If Gulfcoast Waste Services LLC does not follow the procedures outlined in this letter for expedited settlement (i.e., correct the violations, pay the assessed penalty, and sign and return the Agreement) within 30 days of Gulfcoast Waste Services LLC's receipt of this letter, then this settlement offer will be automatically withdrawn, without prejudice to the EPA's ability to file an enforcement action for the cited violations and to seek up to the statutory maximum penalty for each violation.

Thank you for your attention to this matter. If you have any questions, please contact Ashley Pederson, of my staff, at pederson.ashley@epa.gov or 214-665-7561.

Sincerely,

Jeff Yurk, Manager
Waste and Chemical Enforcement Branch

cc:
madelyn.flannagan@tceq.texas.gov
john.shelton@tceq.texas.gov

Attachment: Expedited Settlement Agreement