

INSPECTION REPORT

Inspection Entry Date/Time	6/19/2025 09:50 AM (CT)			Announced: Yes (tenants and related facilities)
Inspection Exit Date/Time	6/19/2025 10:40 AM (CT)			Access: Granted
Regulatory Program	RCRA			
Type of Inspection	Compliance Evaluation Inspection (CEI)			
Facility or Site Name	Crossroad Carries (dba Cedar Marine Terminals)			
Facility/Site Identifier	TXR000062273			
Facility/Site Physical Address	200 Atlantic Pipeline Road			
City, State, Zip Code	Baytown, TX 77523			
County/Borough	Chambers County			
Generator Status	Non-generator, Transporter only			
NAICS	48422			
Type of Operation	Cedar Marine Terminals (CMT) accepts used oil from various vendors. Before transport via barge, CMT stores the used oil in aboveground storage tanks.			
Geographic Coordinates	29.6712, -94.9264			
Additional Persons Participating in Inspection:				
Name	Title	Organization	Email	Phone
Andrew Swingler	Contractor	Eastern Research Group (ERG)	Andrew.Swingler@erg.com	(717) 357-6661
Lead Inspector:				
Janosh Wolters	Janosh Wolters		Digitally signed by Janosh Wolters Date: 2025.07.23 20:12:19 -04'00'	
	ERG	Janosh.Wolters@erg.com		(484) 678-8675

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

The Port of Cedar Bayou and surrounding facilities were selected for inspection based on a 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 other records, including photographs taken, verbal or written statements made during or after the on-site inspection, and/or materials shown, demonstrated, or submitted to the Environmental Protection Agency (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	Opening Conf.	Closing Conf.
Lead Inspector/ Contractor/ERG	Janosh Wolters	Yes	Yes
Chemical Engineer/ Contractor/ERG	Andrew Swingler	Yes	Yes
Cedar Marine Terminals/Director of Regulatory Affairs	Scott Ehrlich	Yes	Yes
Cedar Marine Terminals/Operations Supervisor	Mark Hallmark	Yes	Yes
Cedar Marine Terminals/Terminal Manager	Neil Ligertwood	Yes	Yes

Facility General Description

Tenant/Area	Inspection Date	Process Description	Area of Concern
Cedar Marine Terminals	6/19/2025	CMT collects used oil from various vendors and stores used oil in aboveground storage tanks prior to transport via barge to their facility in Marrero, Louisiana. The facility does not maintain a MARPOL COA.	No

SECTION II – OBSERVATIONS

Facility: Cedar Marine Terminals			
Section: 2.1	Date: 6/19/2025, 09:50 AM	Contains AOC: No	Contains CBI: No
Lead Inspector: Janosh Wolters	Attendees: Scott Ehrlich (Director of Regulatory Affairs), Mark Hallmark (Operations Supervisor), and Neil Ligertwood (Terminal Manager)		
CMT, located in Baytown, TX operates a marine terminal that collects used oil from various vendors. CMT receives used oil by truck and transfers the used oil to Marerro, LA, owned by the same parent company, by private barge. CMT operates as a transfer facility of used oil collecting and accumulating from various customers. All used oil on site in above-ground storage tanks. The facility has four tanks with a capacity to hold 13,000 barrels each, two tanks with a capacity of 10,000 barrels each, and two tanks with a capacity of 2,000 barrels each. CMT/Crossroad Carries is owned by parent company Vertex Energy Inc. and does business as CMT. CMT stores used oil in tanks prior to transferring the used oil by barge to a separate Vertex Energy Inc. facility in Marrero, Louisiana where the used oil is re-refined. CMT uses MPX-420 and MPX-429 barges in conjunction with either the Brendon Livingston or Brendon Crystal tugboats. CMT operates one dock space, approximately 300 feet in length, for their barges (see Appendix 1, Photo 1). CMT does not allow other vessels to use the dock space. It is exclusively used for CMT’s barges for the transportation of used oil. CMT does not generate or accumulate any other RCRA-regulated waste on site. CMT is registered with the EPA as a transporter of hazardous waste and a transporter of used oil under EPA ID TXR000062273. After the opening conference, the inspection team observed CMT’s used oil tanks. All used oil tanks were labeled “Used Oil” and had adequate secondary containment (see Appendix 1, Photo 2). Additionally, the inspection team observed a 300-foot dock (see Appendix 1, Photo 1). The used oil is pumped via direct piping from used oil tanks onto the barge’s tanks. All used oil shipments are tracked using internal tracking software. Mr. Ehrlich explained that used oil is not stored on site longer than 30 days. The inspection team viewed the tracking software on site and observed that the throughput of inbound vs outbound shipments usually show used oil is not stored on site longer than two weeks. The total amount of used oil being stored on site at the time of the inspection was 24,000 barrels. The inspection team did not observe any areas of concern (AOCs) at the time of the inspection. However, further EPA review may change or add to their potential AOCs. A closing conference was conducted at approximately 10:40 AM with CMT personnel.			

SECTION III – RECORDS REVIEW

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

SECTION IV – AREAS OF CONCERN

No AOCs were identified at the time of the inspection.

SECTION IV – FOLLOW UP

Not Applicable

Communication Log

24 hours prior to the on-site inspection, Erin Young-Dahl from EPA Region 6 notified the facility that ERG would be performing a CEI on 6/19/2025.

SECTION VI – LIST OF APPENDICES

Appendix 1. Photograph Log

APPENDIX 1.
PHOTOGRAPH LOG



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Photograph Log

Location: Cedar Marine Terminals		
City: Baytown	County/Parish: Chambers County	State: Texas



Photo No. 1

Photo File Name: DSCN8775.JPG

Date of Photo: 6/19/2025

Time of Photo: 1023 hrs.

Photographer: Janosh Wolters

Description: View of SMT's 300-foot dock used to for used oil transport services.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Photograph Log

Location: Cedar Marine Terminals		
City: Baytown	County/Parish: Chambers County	State: Texas



Photo No. 2

Photo File Name: DSCN8776.JPG

Date of Photo: 6/19/2025

Time of Photo: 1026 hrs.

Photographer: Janosh Wolters

Description: View of a 13,000-barrel tank accumulating used oil. This was taken as an example of how used oil tanks were observed during the visual inspection. All tanks were labeled with the words "Used Oil" and had adequate secondary containment.