

INSPECTION REPORT

Inspection Entry Date/Time	05/20/2024 14:30 (CT)		Announced: No	
Inspection Exit Date/Time	05/20/2024 16:10 (CT)		Access: Granted	
Regulatory Program	RCRA			
Type of Inspection	Focused Compliance Inspection (FCI)			
Facility or Site Name	Martin Energy			
Facility/Site Identifier	TXR000042580			
Facility/Site Physical Address	1 Harbor Island Rd			
City, State, Zip Code	Aransas Pass, TX 75663			
County/Borough	Nueces County			
Generator Status	None			
NAICS	None			
Type of Operation	Martin Energy is a full-service oil field dock that provides vessels with supplies/groceries for production activities, fuels vessels, and offers forklift and crane services.			
Geographic Coordinates	27.847216, -97.061934			
Additional Persons Participating in Inspection:				
Name	Title	Organization	Email	Phone
Cameron Tanaka	Contractor	Eastern Research Group (ERG)	Cameron.Tanaka@erg.com	(508) 314-6432
Erin Young-Dahl	Inspector	EPA REGION 6	YoungDahl.Erin@epa.gov	(214) 665-3166
John Penland	Inspector	EPA REGION 6	Penland.John@epa.gov	(214) 665-9717
Lead Inspector:				
Brook McKeown				09/03/2024
	ERG	Brook.McKeown@erg.com		(410) 459-5811

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

The Port of Corpus Christi 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, and other 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	Brook McKeown	(410) 459-5811	Brook.McKeown@erg.com	Yes	No
RCRA Inspector/ Contractor/ERG	Cameron Tanaka	(508) 314-6432	Cameron.Tanaka@erg.com	Yes	No
Inspector/Enforcement Officer/EPA Region 6	Erin Young-Dahl	(214) 665-3166	YoungDahl.Erin@epa.gov	Yes	Yes
Inspector/Enforcement Officer/EPA Region 6	John Penland	(214) 665-9717	Penland.John@epa.gov	Yes	Yes

Facility General Description

Tenant/Area	Inspection Date	Process Description	Area of Concern
Martin Energy	05/20/24	Martin Energy (Martin) is a full-service oil field dock that provides vessels with supplies and groceries for production activities, fuels vessels, and offers forklift and crane services. The company takes off empty grocery boxes, empty tote tanks of fuel, empty baskets, maintenance waste, completely empty paint buckets, used batteries, trash, oily non-hazardous waste, and used oil (bilge or slop water) from vessels. Martin transfers these materials offsite through a third party. The facility also generates its own waste through maintenance activities in the form of used oil and oil contaminated debris. Martin maintains a MARPOL COA for Annex I and V.	Yes

SECTION II – OBSERVATIONS

Tenant: Martin Energy			
Section: 2.1	Date: 05/20/24, 02:30 PM	Contains AOC: Yes	Contains CBI: No
Lead Inspector: Brook McKeown	Attendees: Ben Plummer (Dispatcher)		
Martin is a full-service oil field dock that provides vessels with supplies and groceries for production activities, fuels vessels, and offers forklift and crane services. The company takes off empty grocery boxes, empty tote tanks of fuel, empty baskets, maintenance waste, completely empty paint buckets, used batteries, general trash, oily non-hazardous waste, and used oil (bilge or slop water) from vessels; it transfers these materials offsite through a third party. Martin mostly services production platforms and other vessels. Mr. Plummer also explained that they have 55-gallon drums of used oil filters on pallets in their warehouse. Martin is a registered used oil handler with EPA ID TXR000042580. Martin maintains any non-hazardous waste manifests that it receives from vessels. To the best of Mr. Plummer’s knowledge, they have never received any hazardous waste. The bilge and slop water Martin receives is pumped by vessels into one of Martin’s 16 used oil totes. These wastes are managed as used oil and are sent to Holcomb Environmental once every month or two months. The company also generates its own waste through maintenance activities in the form of used oil and oil contaminated debris. Martin personnel described their company as a used oil generator and transfer facility. In a follow-up document from Carl DiMario, the facility’s MARPOL COA was included as Attachment A (see Appendix 2). After the opening conference, the inspection team observed Martin’s general yard area, including its containment area, and its warehouse. Observations and areas of concern (AOCs) are organized by section below along with facility responses where relevant. Containment Area: During the inspection, the inspection team observed four red 55-gallon drums full of used oil and four black 55-gallon drums full of oil contaminated filters that were not labeled, along with five empty red 55-gallon drums in the containment area in Martin’s yard (see Appendix 1 – Photo 1) [AOC #1– Martin did not clearly label containers used to store used oil with the words “Used Oil” - 40 CFR 279.22(c)]. In his response, Mr. DiMario explained that the four full red drums were generated by Martin from facility maintenance tasks and containment pump outs, and he included an image of the drums with two visible “Used Oil” labels as Attachment C (see Appendix 2). General Yard Area: In the yard area the inspection team observed eight 55-gallon plastic drums partially filled with oily rags and debris (see Appendix 1 – Photo 2). One of these drums was not labeled (see Appendix 1 – Photos 2 and 3). In his response document, Mr. DiMario explained that the drum contained oily filters and rags generated by Martin personnel from maintenance tasks, and he included an image of the drum with a visible non-hazardous waste label as Attachment D (see Appendix 2). The inspection team also observed an unlabeled box used to store used lead-acid batteries generated by Martin’s customers (see Appendix 1 – Photos 4 and 5) [AOC #2– Martin did not store universal waste batteries or containers used to store waste batteries with a label containing one of the following phrases: “Universal Waste—Battery(ies),” or “Waste Battery(ies),” or “Used Battery(ies)” - 40 CFR 273.14(a)]. The box and the batteries were also not dated [AOC #3 – Martin did not demonstrate the length of time universal waste has been accumulating – 40 CFR 273.15(c)]. In his			

response document, Mr. DiMario explained these batteries are picked up by the supplier and replaced with new batteries through a recycling and reclamation program with the supplier. According to Mr. DiMario, Martin has contacted the battery vendor for a removal and swap out of the used batteries by no later than 06/05/2024 (see Appendix 2). The inspection team also observed five unlabeled black 55-gallon plastic drums (see Appendix 1 – Photos 6 and 7). The inspection team requested Martin personnel to provide the date the containers were brought to the facility and documentation of the contents of the containers. In his follow-up document, Mr. Dimario indicated that the containers held corrosion inhibitor, a customer's product material, and he included a picture of the containers with labels added as Attachment B (see Appendix 2).

Warehouse:

The inspection team also observed two drums of oily rags, pads, and filters with no label (see Appendix 1 – Photos 8 and 9). Mr. DiMario explained in his follow-up document that the oily rags, pads, and filters in this container were generated by Martin personnel from maintenance tasks at various locations on the facility, and he included an image of the drums with visible non-hazardous waste labels as Attachment E (see Appendix 2). The inspection team observed an empty tote that Martin uses to store generated used oil that was not properly labeled (see Appendix 1 – Photos 10 and 11).

After the visual inspection, the inspection team reviewed Martin's manifests for transfers of used oil. Two of the manifests indicated that Martin failed to transfer used oil within 35 days of receiving it onsite (see Appendix 1 – Photos 12 and 13) [**AOC #4** – *Martin held used oil for over 35 days before transfer – 40 CFR 279.45(a)*]. In his follow-up document, Mr. Dimario explained that Martin contacted their used oil vendor to set up automatic 30-day facility pickups to ensure Martin does not exceed the 35-day limitations for storing used oil at the facility (see Appendix 2).

A closing conference was conducted at approximately 4:00 PM with Martin personnel. The AOCs were communicated during the closing; however, further EPA review may change or add ot their potential AOCs. Besides the responses described above, Mr. DiMario also explained that on May 28, 2024, Martin completed training on the following topics, where MES stands for Martin Energy Services:

- "Storage, handling, and marking requirements for generators and or reception facilities (MES Harbor Island)
- Mixing used oil and hazardous waste
- Oil spill control and countermeasure (SPCC) requirements
- Special rules for mixtures, "derived-from" materials, oily rags and oil filters for MES Generators
- Used oil release reporting and response rules
- Rules for used permitted Oil Transfer Facilities (MES Harbor Island)" (see Appendix 2)

Mr. Dimario also included the training sign-in sheet in his response document (see Appendix 2).

SECTION III – RECORDS REVIEW

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

SECTION IV – AREAS OF CONCERN

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

Tenant: Martin Energy		
AOC #1 – Martin did not clearly label containers used to store used oil with the words “Used Oil.”	Citation: 40 CFR 279.22(c)	Section: 2.1
AOC #2 – Martin did not store universal waste batteries or containers used to store waste batteries with a label containing one of the following phrases: “Universal Waste—Battery(ies),” or “Waste Battery(ies),” or “Used Battery(ies).”	Citation: 40 CFR 273.14(a)	Section: 2.1
AOC #3 – Martin did not demonstrate the length of time universal waste has been accumulating.	Citation: 40 CFR 273.15(c)	Section: 2.1
AOC #4 – Martin held used oil for over 35 days before transfer.	Citation: 40 CFR 279.45(a)	Section: 2.1

SECTION V – FOLLOW UP

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. 05/28/24 Martin email – Carl DiMario sent an email including requested documents and responses to AOCs.

SECTION VI – LIST OF APPENDICES

Appendix 1. Photograph Log

Appendix 2. Martin Energy Follow-Up Document

APPENDIX 1.
PHOTOGRAPH LOG



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Photograph Log

Photo No. 1

Location: Martin Energy		
City: Aransas Pass	County/Parish: Nueces	State: Texas



Photo File Name: DSCN1065

Date of Photo: 05/20/2024

Time of Photo: 15:08 hrs.

Photographer: Cameron Tanaka

Description: View of four red 55-gallon drums full used oil and four black 55-gallon drums full of oil contaminated filters that were not labeled, along with five empty red 55-gallon drums in the containment area in Martin's yard.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 2

Location: Martin Energy		
City: Aransas Pass	County/Parish: Nueces	State: Texas



Photo File Name: DSCN1066

Date of Photo: 05/20/2024

Time of Photo: 15:10 hrs.

Photographer: Cameron Tanaka

Description: View of eight 55-gallon plastic drums partially filled with oily rags and debris in Martin's general yard area. One of these drums was unlabeled (observed).



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 3

Location: Martin Energy		
City: Aransas Pass	County/Parish: Nueces	State: Texas



Photo File Name: DSCN1067

Date of Photo: 05/20/2024

Time of Photo: 15:11 hrs.

Photographer: Cameron Tanaka

Description: Close-up view of the unlabeled 55-gallon plastic drum in the general yard area shown in Photo No. 2 (observed).



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 4

Location: Martin Energy		
City: Aransas Pass	County/Parish: Nueces	State: Texas



Photo File Name: DSCN1068

Date of Photo: 05/20/2024

Time of Photo: 15:19 hrs.

Photographer: Cameron Tanaka

Description: View of unlabeled box used to store used lead-acid batteries in Martin's general yard area.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 5

Location: Martin Energy		
City: Aransas Pass	County/Parish: Nueces	State: Texas



Photo File Name: DSCN1069

Date of Photo: 05/20/2024

Time of Photo: 15:19 hrs.

Photographer: Cameron Tanaka

Description: View of the inside of the unlabeled box used to store used lead-acid batteries in Martin's general yard area.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 6

Location: Martin Energy		
City: Aransas Pass	County/Parish: Nueces	State: Texas



Photo File Name: DSCN1070

Date of Photo: 05/20/2024

Time of Photo: 15:23 hrs.

Photographer: Cameron Tanaka

Description: View of five unlabeled black 55-gallon plastic drums in Martin's general yard area (observed).



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Photograph Log

Photo No. 7

Location: Martin Energy		
City: Aransas Pass	County/Parish: Nueces	State: Texas



Photo File Name: DSCN1071

Date of Photo: 05/20/2024

Time of Photo: 15:25 hrs.

Photographer: Cameron Tanaka

Description: Overview of the area in the general yard area where the drums shown in Photo No. 7 were located (observed).



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 8

Location: Martin Energy		
City: Aransas Pass	County/Parish: Nueces	State: Texas



Photo File Name: DSCN1072

Date of Photo: 05/20/2024

Time of Photo: 15:34 hrs.

Photographer: Cameron Tanaka

Description: View of a drum containing oily rags, pads, and filters with no label in Martin's warehouse (observed).



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 9

Location: Martin Energy		
City: Aransas Pass	County/Parish: Nueces	State: Texas



Photo File Name: DSCN1074

Date of Photo: 05/20/2024

Time of Photo: 15:35 hrs.

Photographer: Cameron Tanaka

Description: View of a drum containing oily rags, pads, and filters with no label in Martin's warehouse (observed).



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 10

Location: Martin Energy		
City: Aransas Pass	County/Parish: Nueces	State: Texas



Photo File Name: DSCN1075

Date of Photo: 05/20/2024

Time of Photo: 15:38 hrs.

Photographer: Cameron Tanaka

Description: View of an empty used oil tote in Martin's warehouse that was not properly labeled (observed).



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 11

Location: Martin Energy		
City: Aransas Pass	County/Parish: Nueces	State: Texas

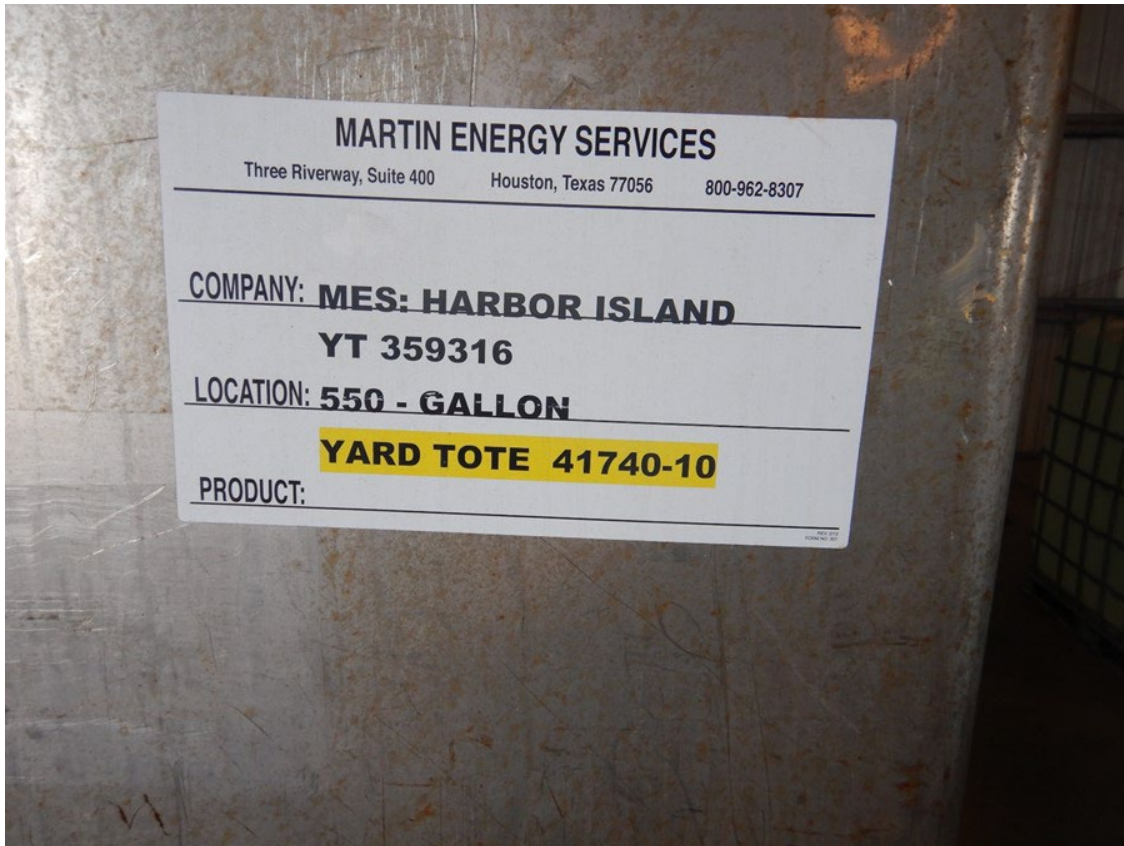


Photo File Name: DSCN1076

Date of Photo: 05/20/2024

Time of Photo: 15:38 hrs.

Photographer: Cameron Tanaka

Description: Close-up view of the label on the empty used oil tote in Martin's warehouse shown in Photo No. 10 (observed).



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 12

Location: Martin Energy		
City: Aransas Pass	County/Parish: Nueces	State: Texas

NON-HAZARDOUS MATERIAL MANIFEST - NOT NEGOTIABLE

1. GENERATOR NAME & ADDRESS
Name: Gulf Oceanic Marine
Street Address: LA 182
City, ST ZIP Code: Aransas Pass, TX 78008
Telephone No.: (985) 594 8221
US EPA #:

2. GENERATOR SITE: RIG OR VESSEL INFORMATION
Name: LOUIC
Street Address: LA 182
City, ST ZIP Code: Aransas Pass, TX 78008
Telephone No.: (985) 594 8221
US EPA #:

3. PICK UP LOCATION
Name:
Street Address:
City, ST ZIP Code:

4. MANIFEST NO.: 309734
VT 251435

5. CONTAINER IDENTIFICATION NUMBER(S), (SECURITY TAG#):
a) _____
b) _____
c) _____
d) _____
e) _____

6. TRUCK #
7. BRANCH #
8. TCEG#

9. CARGO MANIFEST #
10. AFE/REQ/TRA/PR #
11. THIRCC #

IN CASE OF SPILL, FIRE, LEAK OR OTHER EMERGENCY CALL MARTIN ENERGY SERVICES TOLL FREE (800) 962-8307

CUSTOMER ORDER INFORMATION

12. Description of Waste
a) Waste oil
b) Bilge
c) _____
d) _____
e) _____

13. # of Containers: 1
14. Container Size: 550 500
15. Total Qty: 550 500
16. Unit: Wt./Vol.
17. Additional Information:

GENERATOR INFORMATION
Generator represents, warrants and consents that the waste delivered to the service provider (Martin) at its designated facility hereunder will be acceptable waste and will not contain any unacceptable quantity of regulated hazardous waste not disclosed within waste characterization and waste profile documents submitted prior to approval before waste is removed from generation point. The material must also not contain any radioactive materials or substances, or toxic waste or substances, as defined by applicable Federal, State and Local laws and regulations without prior approval and profile documentation from service provider. Any waste which does not meet these requirements shall hereafter be referred to as "unacceptable waste". I certify that the materials described above on this Manifest are not subject to Federal regulations for reporting proper disposal of Hazardous Waste.

18. GENERATOR PRINTED/TYPED NAME: Jimmie Ordoyne
SIGNATURE: [Signature]
MO. DAY YR. 05-13-21

TRANSPORTER INFORMATION

19. TRANSPORTER 1 PRINTED/TYPED NAME: [Signature]
FACILITY US EPA #: [Signature]
SIGNATURE: [Signature]
MO. DAY YR. 05-13-21

20. TRANSPORTER 2 PRINTED/TYPED NAME: [Signature]
FACILITY US EPA #: [Signature]
SIGNATURE: [Signature]
MO. DAY YR. 05-13-21

DESTINATION FACILITY INFORMATION
Designated Facility Owner or Operator: Certification of Receipt of materials covered by the manifest

21. PRINTED/TYPED NAME: [Signature]
SIGNATURE: [Signature]
MO. DAY YR. 05-13-21

FACILITY NAME: [Signature]
FACILITY ADDRESS: [Signature]
FACILITY US EPA #: [Signature]

Photo File Name: DSCN1077

Date of Photo: 05/20/2024

Time of Photo: 15:56 hrs.

Photographer: Cameron Tanaka

Description: View of the first manifest for a used oil transfer that indicates the used oil had been on Martin's site for over 35 days.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 13

Location: Martin Energy

City: Aransas Pass

County/Parish: Nueces

State: Texas

NON-HAZARDOUS MATERIAL MANIFEST - NOT NEGOTIABLE

1. GENERATOR NAME & ADDRESS
Name: Buffalo Marine
Street Address: 8201 E. 61st St
City, ST, ZIP Code: Houston, TX, 77012
Telephone No.: 713-923-5571
US EPA #: 309756

2. GENERATOR SITE: RIG OR VESSEL INFORMATION
Name: San Roberto
Street Address: 8201 E. 61st St
City, ST, ZIP Code: Houston, TX, 77012
Telephone No.: 282-571-7238
US EPA #:

3. PICK UP LOCATION
Name:
Street Address:
City, ST, ZIP Code:

4. MANIFEST NO.: 309756

5. CONTAINER IDENTIFICATION NUMBER(S), (SECURITY TAG):
a)
b)
c)
d)
e)

6. TRUCK #
7. BRANCH #
8. TCEQ #

9. CARGO MANIFEST #
10. AFE/REG/OTFR #
11. TNRC #

IN CASE OF SPILL, FIRE, LEAK OR OTHER EMERGENCY CALL MARTIN ENERGY SERVICES TOLL FREE (800) 962-8307

CUSTOMER ORDER INFORMATION

12. Description of Waste
a) 5.11x45, 0.17 bags
b)
c)
d)
e)

13. # of Containers
14. Container Size
15. Total Qty.
16. Unit
17. Additional Information

GENERATOR INFORMATION
Generator represents, warrants and covenants that the waste delivered to the service provider (Martin) at its designated facility hereunder will be acceptable waste and will not contain any unacceptable quantity of regulated hazardous waste not disclosed within waste characterization and waste profile documents submitted prior for approval before waste is removed from generation point. The material must also not contain any radioactive materials or substances, or toxic waste or substances, as defined by applicable Federal, State and Local laws and regulations without prior approval and profile documentation from service provider. Any waste which does not meet these requirements shall hereinafter be referred to as "Unacceptable Waste". I certify that the materials described above on this manifest are not subject to Federal regulations for reporting proper disposal of Hazardous Waste.

18. GENERATOR PRINTED/TYPED NAME
SAN ROBERTO
SIGNATURE
MO. DAY YR. 08 21 23

TRANSPORTER INFORMATION

19. TRANSPORTER 1 PRINTED/TYPED NAME
Facility US EPA #
SIGNATURE
MO. DAY YR. 2 15 20

20. TRANSPORTER 2 PRINTED/TYPED NAME
Facility US EPA #
SIGNATURE
MO. DAY YR.

DESTINATION FACILITY INFORMATION
Designated Facility Owner or Operator: Certification of Receipt of materials covered by the manifest

21. PRINTED/TYPED NAME
SIGNATURE
MO. DAY YR.

FACILITY NAME
FACILITY ADDRESS
FACILITY US EPA #

Photo File Name: DSCN1078

Date of Photo: 05/20/2024

Time of Photo: 15:56 hrs.

Photographer: Cameron Tanaka

Description: View of the second manifest for a used oil transfer that indicates the used oil had been on Martin's site for over 35 days.

APPENDIX 2.
MARTIN ENERGY FOLLOW-UP DOCUMENT



May 28, 2024

In reference to: Martin Operating Terminal - POCCA Week 3 EPA RCRA Inspections

RE: MES Harbor Island facility Compliance Inspection 5/20/2024

To Whom It May Concern,

In response to the compliance inspection performed at the Harbor Island Facility, we have listed all corrective actions implemented and additional compliance training for personnel. Please see responses and corrective actions following each identified area of concern in enclosed Attachments.

If you have any questions or require additional information you may contact Mr. Carl DiMario at (251) 375-4264 or carl.dimario@martinmlp.com.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Carl DiMario', with a large, stylized flourish at the end.

Carl DiMario,
Waste Program Manager/Senior Environmental Specialist

Bob Winget, Harbor Island Facility Area Manager

cc:
Randall Whitmore, Martin Resource Management Corporate Environmental
Director Martin Files

Document Request

- 1 Please provide a copy of the facility's MARPOL Certificate of Adequacy **(See Attachment A)**
- 2 During the inspection we observed five unlabeled black 55-gallon plastic drums, for these containers, could you please provide: **(See Attachment B)**

The date the containers were brought to the facility.

Documentation of the contents of the containers. **(Customer Product "Corrosion Inhibitor")**
- 5 **see areas of concern #1** During the inspection we observed four red 55-gallon steel drums which reportedly contained used oil. For these drums, can you please provide the date the used oil drums were transferred to the site from your customer's vessel and documentation of the date they are transferred off-site (if the pick-up occurs within the next two weeks). **(Martin Generated from facility maintenance tasks) (See Attachment C)**

Areas of Concern

The following waste containers were not labeled as to their contents:

- 1 Four red 55-gallon steel drums of used oil generated by your customers in the containment area in the yard. **(Martin generated from containment pump outs and maintenance) (See Attachment C)**
- 2 One black 55-gallon plastic drum that contained spent oily filters/rags generated by your customers. This was staged with seven other 55-gallon black plastic drums, each of which were labeled. **(Drum containing oily filters/rags was generate by Martin personnel from maintenance tasks throughout the yard.) (See Attachment D)**
- 3 A box used to store lead-acid batteries, generated by your customers. **(Customer batteries for reclamation, these batteries are picked up by supplier and replaced with new batteries. This is a recycle program from supplier to client for reuse) Client has contacted vendor for removal/swap out of batteries that will be completed NLT 6/5/2024.**
- 4 Two 55-gallon drums containing oily filters/rags, generated by Martin Operating Terminal, located in the warehouse. **(Maintenance is performed at various locations within the confines of the facility on pumps and PIT equipment. Once maintenance tasks are completed the drums are moved to the "Used Oil laydown area.) (See Attachment E)**
- 5 Two shipments of used oil transferred to the facility were documented to have been stored on-site for longer than 35 days, based on the dates that your customer signed the manifest and the date the transporter signed that they picked the material up. As a transfer facility of used oil, used oil containers have a storage limit of 35 days. **(Martin has contacted our USED OIL vendor to automatically set up 30 day facility pickups to ensure Martin does not exceed the 35 day limitations for storing USED OIL on site)**

Please note: On May 28, 2024 training was completed on the following topics.

Storage, handling, and marking requirements for generators and or reception facilities (MES Harbor Island)

Mixing used oil and hazardous waste

Oil spill control and countermeasure (SPCC) requirements

Special rules for mixtures, "derived-from" materials, oily rags and oil filters for MES Generators

Used oil release reporting and response rules

Rules for used permitted Oil Transfer Facilities (MES Harbor Island)

Training sign in sheet attached **(See Attachment F)**

Attachment A

United States Coast Guard
Certificate Of Adequacy
for
Reception Facility



This certifies that: Martin Energy Services-Harbor Island has facilities adequate MARPOL I
to receive _____
_____ MARPOL V

From oceangoing ships, as required by the International Convention for the Prevention of Pollution from Ships, 1973. As modified by the protocol of 1978 (MARPOL 73/78), The Act to Prevent Pollution from Ships, 33 USC 1901-1912 and associated U.S. Regulations in 33 CFR 158.

This certificate is issued pursuant to an application dated 17FEB2022 and an inspection dated 02MAR2022, copies of which are attached, and part of this certificate. Each terminal listed in the application shall maintain a copy of this certificate available for inspection by Coast Guard personnel and the master, operator, agent, or owner of any ship using or intending to use this terminal.

Terminals and ports required to have an operations manual for oil transfer described in 33 CFR 154.300 shall attach a copy of this certificate thereto.

The terminal/port person in charge identified in the attached application shall notify the U.S. Coast Guard Captain of the Port (COTP) in writing after any of the reception facility information or terminal/port information identified in 33 CFR 158.165 changes.

The terminal/port owner, operator, or person in charge is liable for violations of the provisions of 33 CFR 158 and may be subject to the maximum penalty under 33 USC 1908, as adjusted for inflation and found at 33 CFR 27.3.

The terminal/port owner, operator, or person in charge shall ensure that the reception facility holds each state, local, and federal permit and license required by environmental laws and regulations concerning garbage, residues and mixtures containing oil or noxious liquid substances. This certificate certifies compliance with applicable sections of 33 CFR 158, but does not certify compliance with any other law or regulation.

This certificate is valid for a period of 5 years from the date issuance; or until suspended or revoked; or until 30 days after the operator cited on the certificate changes; at which time it shall be promptly returned to the U.S. Coast Guard COTP.

This Certificate Expires:

02MAR2027

5 years from date of issuance

D. Salik
Signature of COTP

D. SALIK CDR, USCG, By direction

Typed Name of COTP

Sector Corpus Christi

COTP Zone

02MAR22
Date

Date

Phone

The following waivers to this certificate are granted. The waivers shall be attached to and are part of this certificate.

Waiver Description (brief description)

Expire Date (if applicable)

Attachment B



Attachment C



Attachment D



Attachment E



Attachment F

Employee Training Records

Facility Name: HARBOR ISLAND Calendar Year: 5/28/2024
Use this form to document Employee Training conducted at the facility.

Key Objectives:

Understanding of the RCRA used oil rules found in 40 CFR 279 and TCEQ Used Oil Transfer Facilities regulations and requirements

How to properly store, handle, mark, and label used oil containers

Review the facility's used oil release reporting responsibilities

Review Manifests/Logs and transfer documents

Training Topics:

Storage, handling, materials, oily rags and oil filters for MES Generators and marking requirements for generators and or reception facilities (MES Harbor Island)

Rules for used permitted Oil Transfer Facilities (MES Harbor Island)

I have participated in the Spill Prevention Control & Countermeasure Plan Training. I understand the components and goals of the training.

Date	Employee Name	Employee's Title	Employee's Signature	Trainer's Name
5/28/24	Daniel Hawes	Utility IV		Carl DiMario 
5/28/24	Brian Cain	Utility IV		Carl DiMario 
5/28/24	Curtis Brothers	Utility III		Carl DiMario 
5/28/24	John Morey	Utility III		Carl DiMario 
5/28/24	Bob Winget	Area Facility Manager		Carl DiMario 