

INSPECTION REPORT

Inspection Entry Date/Time	05/21/2024 09:20 (CT)		Announced: No	
Inspection Exit Date/Time	05/21/2024 11:45 (CT)		Access: Granted	
Regulatory Program	RCRA			
Type of Inspection	Focused Compliance Inspection (FCI)			
Facility or Site Name	G&H Towing Company			
Facility/Site Identifier	None			
Facility/Site Physical Address	1420 Harbor Drive			
City, State, Zip Code	Corpus Christi, TX 78407			
County/Borough	Nueces County			
Generator Status	N/A			
NAICS	None			
Type of Operation	G&H Towing Company provides ship docking and tugging of ships in Corpus Christi, operating 12 tugs.			
Geographic Coordinates	27.811794, -97.408807			
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 (POCC) 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 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
G&H Towing Company	05/21/24	G&H Towing Company (G&H) operates a permanently moored barge to moor tugs. The company provides ship docking and tugging of ships in Corpus Christi, operating 12 tugs. G&H use their tugs to assist vessels, barges, and cargo ships going inbound and outbound of the port waterway. It does not provide any offloading or loading for these boats. G&H generates wastes including spent filters, oily rags, bilge slops, liquid paint waste, used batteries, and empty paint cans. Maintenance on its tugboats generating used oil is performed by a third party. The facility does not maintain a MARPOL COA.	Yes

SECTION II – OBSERVATIONS

Tenant: G&H Towing Company			
Section: 2.1	Date: 05/21/24, 9:20 AM	Contains AOC: Yes	Contains CBI: No
Lead Inspector: Brook McKeown	Attendees: Tim Dement (Sr. PE)		
G&H operates a dock and a permanently moored barge to moor tugs at its property which is leased from the POCC. The company provides ship docking and tugging of ships in Corpus Christi, operating 12 tugs. G&H uses its tugs to assist vessels, barges, and cargo ships going inbound and outbound of the port waterway. The company does not provide any offloading or loading for these boats. Maintenance on its tugboats generating used oil is performed at John Bludworth Shipyard by a third party and G&H does not generate used oil at its Corpus Christi location. G&H generates wastes including spent filters, oily rags, bilge slops, liquid paint waste, used batteries, and empty paint cans at its Corpus Christi site. Gainco, Inc., a third-party vendor, handles and disposes of all of G&H's generated slops, used oil, and paint wastes. Kirby Inland Marine and Southwest Shipyard, third-party vendors, dispose of bilge slops and trash generated by G&H. Spent filters and oily rags are considered non-hazardous wastes. G&H has two containers for paint waste that are removed about every six months, or at most once a year. G&H does not have an EPA ID. G&H did not respond to the inspection team to clarify if they have a MARPOL COA. During the inspection, G&H personnel did not think they had one. During the inspection, the inspection team visually inspected G&H's warehouse and waste area. The warehouse held boat parts and supplies. The waste area contained spent filters, oily rags, bilge slops, used batteries, and liquid paint waste (see Appendix 1 – Photos 1 and 2). The inspection team observed five containers of engine slop/oily rags and one container of waste paint that were partially full and not labeled as to their contents [AOC #1 – G&H did not clearly label containers used to store waste paint with the words "Universal Waste: Paint and Paint Related Waste" – 30 TAC 335.262(c)(2)(F); AOC #2 – G&H did not clearly label containers used to store used oil with the words "Used Oil" - 40 CFR 279.22(c)(1)]. Mr. Dement indicated that when the liquid paint waste containers are about 75% full, a third party takes the container off-site. After the walk through, the inspection team observed G&H's log of wastes coming onsite and going offsite, a Gainco, Inc. oily waste profile from US Ecology, and a non-hazardous paint waste manifest from 2019. The inspection team noted no issues with these documents. A closing conference was conducted at approximately 11:30 AM with G&H personnel. During the closing conference, the inspection team communicated the AOCs and requested the following documents and clarifications: • Confirmation on whether G&H has a MARPOL COA and a copy of it, if applicable; • Shipping papers or manifests for the last two shipments of waste paint; • The waste profile for the paint waste. Mr. Dement sent a follow-up email on 06/07/2024, which only included a non-hazardous waste manifest from May 2024 (see Appendix 2). The inspection team noted no issues with this manifest. Further EPA review may change or add potential AOCs.			

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: G&H Towing Company		
AOC #1 – G&H did not clearly label containers used to store waste paint with the words “Universal Waste: Paint and Paint Related Waste”.	Citation: 30 TAC 335.262(c)(2)(F)	Section: 2.1
AOC #2 – G&H did not clearly label containers used to store used oil with the words “Used Oil”.	Citation: 40 CFR 279.22(c)(1)	Section: 2.1

SECTION V – FOLLOW UP

Any facility follow-up items are as discussed in the observations in Section II. Documents or files provided by the facility 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. 06/07/24 G&H email – Tim Dement sent a non-hazardous waste manifest from May 2024.

SECTION VI – LIST OF APPENDICES

Appendix 1. Photograph Log

Appendix 2. G&H Towing Non-Hazardous Waste Manifest from May 2024

APPENDIX 1.
PHOTOGRAPH LOG



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Photograph Log

Photo No. 1

Location: G&H Towing Company		
City: Corpus Christi	County/Parish: Nueces	State: Texas



Photo File Name: DSCN1079
Date of Photo: 05/21/2024
Time of Photo: 09:55 hrs.
Photographer: Cameron Tanaka
Description: Overview of G&H's waste area.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 2

Location: G&H Towing Company		
City: Corpus Christi	County/Parish: Nueces	State: Texas



Photo File Name: DSCN1080

Date of Photo: 05/21/2024

Time of Photo: 09:55 hrs.

Photographer: Cameron Tanaka

Description: View of unlabeled container of paint waste in G&H's waste area.

APPENDIX 2.
G&H TOWING NON-HAZARDOUS WASTE MANIFEST FROM MAY 2024

NON-HAZARDOUS WASTE MANIFEST		1. Generator ID Number <i>N/A</i>		2. Page 1 of 1		3. Emergency Response Phone <i>861 884-8791</i>		4. Waste Tracking Number <i>20243005</i>	
		5. Generator's Name and Mailing Address <i>5411 TOWERS 1420 HAZARD DRIVE CORPUS CHRISTI TX 78401</i>		Generator's Site Address (if different than mailing address) <i>5411 TOWERS 1420 HAZARD DRIVE CORPUS CHRISTI TX 78401</i>					
Generator's Phone: <i>861 884-8791</i>		6. Transporter 1 Company Name <i>Gunnco, Inc</i>		U.S. EPA ID Number <i>TXR000080455</i>		7. Transporter 2 Company Name <i>Gunnco, Inc</i>		U.S. EPA ID Number <i>TXR000080455</i>	
8. Designated Facility Name and Site Address <i>UT's Ecology of Texas 3277 CR 669 ROBESON TX 78380</i>		U.S. EPA ID Number <i>TXD0167452340</i>		Facility's Phone: <i>381 3518</i>					
9. Waste Shipping Name and Description		10. Containers		11. Total Quantity		12. Unit Wt./Vol.			
		No.	Type						
1. Non Hazardous, Non DOT Regulated, NA		6	DM	2016	P	HS	NHNI		
2. Non Hazardous, Non DOT Regulated, NA		1	DM	336	P	HS	NHNI		
3.									
4.									
13. Special Handling Instructions and Additional Information <i>1. WSA 010131444-D - Debris, DIE contaminated w/ hydraulic oil 2. WSA 010136717-D - Filters, Contaminated w/ hydraulic oil</i>									
14. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations.									
Generator's/Offlor's Printed/Typed Name <i>James Powers</i>		Signature <i>[Signature]</i>				Month Day Year <i>5 30 20</i>			
15. International Shipments ☐ Import to U.S. ☐ Export from U.S. Port of entry/exlt: _____ Date leaving U.S.: _____									
16. Transporter Acknowledgment of Receipt of Materials									
Transporter 1 Printed/Typed Name <i>Gunnco, Inc</i>		Signature <i>[Signature]</i>				Month Day Year <i>5 30 20</i>			
Transporter 2 Printed/Typed Name <i>Gunnco, Inc</i>		Signature <i>[Signature]</i>				Month Day Year <i>5 30 20</i>			
17. Discrepancy									
17a. Discrepancy Indication Space ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection									
Manifest Reference Number: _____									
17b. Alternate Facility (or Generator)		U.S. EPA ID Number							
Facility's Phone: _____									
17c. Signature of Alternate Facility (or Generator)						Month Day Year			
18. Designated Facility Owner or Operator: Certification of receipt of materials covered by the manifest except as noted in Item 17a									
Printed/Typed Name <i>Ernie J. Vela</i>		Signature <i>[Signature]</i>				Month Day Year <i>5 30 20</i>			