



March 20, 2026

SENT BY ELECTRONIC MAIL

ltaylor@portoforange.com

Lorrie Taylor
Executive Port Director/ CEO
1201 Childers Rd,
Orange, TX 77630

RE: EPA's RCRA Inspections of February and March 2024 ("Inspection"), Port of Orange (TXR000078782),
No Further Action

Dear Ms. Taylor,

As a follow up to the referenced Inspections, the Environmental Protection Agency, Region 6 (EPA) writes to you regarding the Port of Orange ("PO"), as you were involved in discussions with EPA's enforcement team during the course of the Inspection.

It remains EPA's position that any person generating or transporting characteristic and/or listed hazardous waste as defined by the Resource Conservation and Recovery Act (RCRA) and the regulations promulgated thereunder or owning a facility for the treatment, storage, and/or disposal of such substances is subject to the notification requirements of Section 3010(a) of RCRA, 42 U.S.C. § 6930. It follows, therefore, that EPA looks to the PO to understand its relationship with its tenants (who are often transitory) and to ensure that, where EPA cannot locate a tenant and/or a tenant does not accept responsibility for violations of RCRA and its regulations, the PO, as the owner of the referenced property, is liable.

Over the ensuing months as one of EPA's enforcement team worked with respective tenants, EPA was able to confirm that the issues identified during the inspections were addressed by respective tenants. EPA has decided to close the referenced inspections with no further action as to the PO. This determination applies solely to the PO in connection with this inspection and does not preclude future action should new information arise.

It should be emphasized that, if EPA conducts subsequent inspections at the PO and cannot identify or locate a tenant or other responsible party, EPA will hold the PO responsible for any RCRA violations (state and Federal) and pursue any associated civil penalties.

If you have questions or follow up, you may contact our attorney, Christyn Cavazos at Cavazos.Christyn@epa.gov.

Sincerely,

JEFFREY YURK Digitally signed by JEFFREY YURK
Date: 2026.03.20 06:20:54 -05'00'

Jeff Yurk
Manager
Waste and Chemical Enforcement Branch
EPA Region 6