

INSPECTION REPORT

Inspection Entry Date/Time	6/24/2025 9:30 AM (CT)	Announced: Yes
Inspection Exit Date/Time	6/24/2025 10:10 AM (CT)	Access: Granted
Regulatory Program	RCRA	
Type of Inspection	Focused Compliance Inspection (FCI)	
Facility or Site Name	Chemical Response and Remediation Contractors, Inc.	
Facility/Site Identifier	TXR000040014	
Facility/Site Physical Address	18635 Primera Rd. Unit #1	
City, State, Zip Code	Harlingen, TX 78552	
County/Borough	Cameron	
Generator Status	N/A	
NAICS	48411, 56291	
Type of Operation	Chemical Response and Remediation Contractors, Inc. (CRRC) performs environmental remediation and transportation of non-hazardous waste.	
Geographic Coordinates	26.226111, -97.727579	

Additional Persons Participating in Inspection:			
Name	Title	Organization	Email
Cameron Tanaka	Contractor	Eastern Research Group (ERG)	Cameron.Tanaka@erg.com
Lead Inspector:			
Vince Damiano		Vincent Damiano	Digitally signed by Vincent Damiano Date: 2025.08.06 12:57:35 -04'00'
	ERG	Vince.Damiano@erg.com	

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

The Port Harlingen 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 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	Vince Damiano	Yes	Yes
RCRA Inspector/ Contractor/ERG	Cameron Tanaka	Yes	Yes
President/CRRC	David Hanawa	Yes	Yes

Facility General Description

Tenant/Area	Inspection Date	Process Description	Area of Concern
Chemical Response and Remediation Contractors, Inc.	6/24/25	CRRC performs environmental remediation and transportation of non-hazardous waste. The facility does not maintain a MARPOL COA.	Yes

SECTION II – OBSERVATIONS

Facility: Chemical Response and Remediation Contractors, Inc.			
Section: 2.1	Date: 6/24/25, 9:30 AM	Contains AOC: Yes	Contains CBI: No
Lead Inspector: Vince Damiano	Attendees: David Hanawa (President)		
CRRC, located in Harlingen, TX, performs environmental remediation and transportation of non-hazardous waste. As an environmental remediation contractor, CRRC cleans or removes asbestos, mold, trash, spills on land and in water, soil, and caustic materials and acts as the transporters for these cleanup activities. CRRC only transports non-hazardous and DOT Class I hazardous materials (not hazardous waste), which are occasionally brought onto the CRRC site and stored in roll-offs while waste profiles are rendered. Although CRRC is registered with the EPA as a hazardous waste transporter (EPA ID TXR000040014), CRRC does not typically transport hazardous waste or RCRA-regulated waste, and DOT hazardous materials generated at a remediation site are transported by a third-party transporter. CRRC transports and stores materials and waste from multiple remediation sites at once in three-quarter-ton trucks, trailers, roll-off trucks, and roll-off containers. CRRC transports these materials and wastes to US Ecology in Robstown, TX, or the LaGloria landfill in Edinburg, TX. The facility does not have any dock space. The facility generates used oil from onsite maintenance activities and sends it to a recycler approximately once a month. Facility personnel indicated that they generate approximately 50 gallons of used oil per month. CRRC has a third-party transporter that takes its used oil off-site to the recycler. The facility also generates used batteries that are recycled at the original battery supplier’s facility, transported there also by the supplier. CRRC also collects waste from local schools and educational chemistry laboratories to be lap packed and sent for disposal. At most, CRRC will do this 1-2 times a year, but will sometimes not conduct a lab pack collection over the course of a calendar year. The schools are considered the generators of waste on manifests; however, Mr. Hanawa explained that approximately 80% of the waste picked up from this activity is non-hazardous, 15% of the waste is DOT hazardous, and only 5% of the waste is RCRA-regulated hazardous waste, such as paint, corrosives, or acids. All waste collected and handled by CRRC from the schools is typically one pint to one quart in size. Mr. Hanawa stated that any hazardous waste would not be handled by CRRC, and a third-party transporter is contracted to move that waste; an example manifest of this situation is provided in Appendix 2. Mr. Hanawa stated that the waste is segregated in the field for incompatibles and profiled once brought back to the facility. It takes about 30 days to have the lab packs completely profiled and shipped to the disposal facility. After the opening conference, the inspection team observed CRRC’s operations, including the yard area and the garage. In the yard area, close to the garage, the inspection team observed one 300-gallon tank storing used oil that CRRC generated, but the tank was not labeled as “Used Oil” (see Appendix 1 – Photo 1) [AOC #1 – CRRC did not clearly label a container used to store used oil with the words “Used Oil” - 40 CFR 279.22(c)(1)]. CRRC personnel immediately labeled the containers as used oil using spray paint (see Appendix 1 – Photo 3). In the garage area, the inspection team observed approximately 25 universal waste batteries that were not			

labelled or dated (see Appendix 1 – Photo 2) [**AOC #2** – CRRC did not label batteries being managed as universal waste properly or store the batteries in a properly labeled container – 40 CFR 273.14(a)] & [**AOC #3** – CRRC did not demonstrate the accumulation start date for universal waste– 40 CFR 273.15(c)].

The inspection team did not observe other 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 10:10 AM with CRRC personnel. The AOCs identified at the time of the inspection were communicated during the closing. Following the inspection on 8/4/2025, Mr. Hanawa provided pictures of the used oil tank labeled and the battery storage area labeled (see Appendix 3).

SECTION III – RECORDS REVIEW

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

SECTION IV – AREAS OF CONCERN

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

Facility: Chemical Response and Remediation Contractors, Inc.

AOC #1 – CRRC did not clearly label a container used to store used oil with the words “Used Oil.”	Citation: 40 CFR 279.22(c)(1)	Section: 2.1
AOC #2 – CRRC did not label batteries being managed as universal waste properly or store the batteries in a properly labeled container.	Citation: 40 CFR 273.14(a)	Section: 2.1
AOC #3 – CRRC did not demonstrate the accumulation start date for universal waste.	Citation: 40 CFR 273.15(c)	Section: 2.1

SECTION V – FOLLOW UP

Not Applicable

Communication Log

24 hours prior to the on-site inspection, Erin Young-Dahl from EPA notified the facility that ERG would be performing a FCI at the facility.

SECTION VI – LIST OF APPENDICES

Appendix 1. Photograph Log

Appendix 2. Example Manifest of Hazardous Waste Pick Up

Appendix 3. CRRC Follow-Up Photos

APPENDIX 1.
PHOTOGRAPH LOG

Location: Chemical Response and Remediation Contractors, Inc.		
City: Harlingen	County/Parish: Cameron	State: Texas



Photo No. 1

Photo File Name: DSCN8780

Date of Photo: 6/24/2025

Time of Photo: 0957 hrs.

Photographer: Vince Damiano

Description: View of a 300-gallon tank storing used oil in the facility's yard area that was not labeled.

Location: Chemical Response and Remediation Contractors, Inc.		
City: Harlingen	County/Parish: Cameron	State: Texas



Photo No. 2

Photo File Name: DSCN8781

Date of Photo: 6/24/2025

Time of Photo: 1001 hrs.

Photographer: Vince Damiano

Description: View of about 25 unlabeled universal waste batteries in the facility's garage area.

Location: Chemical Response and Remediation Contractors, Inc.		
City: Harlingen	County/Parish: Cameron	State: Texas



Photo No. 3

Photo File Name: DSCN8782

Date of Photo: 6/24/2025

Time of Photo: 1003 hrs.

Photographer: Vince Damiano

Description: View of a 300-gallon tank storing used oil in the facility's yard area that CRRC personnel spray painted a "Used Oil" label after the inspection team observed that there was no label.

APPENDIX 2.
EXAMPLE MANIFEST OF HAZARDOUS WASTE PICK UP

Please print or type.

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number TXCESQG		2. Page 1 of 4		3. Emergency Response Phone 800 535 5053 INFOTRAC		4. Manifest Tracking Number 006937009 GBF			
		5. Generator's Name and Mailing Address WESLACO ISD PO BOX 533207, HARLINGEN, TX 78553						Generator's Site Address (if different than mailing address) 319 WEST FOURTH STREET WESLACO, TX 78596			
6. Transporter 1 Company Name ENVIROMAID INDUSTRIAL SYSTEMS/SERVICES		U.S. EPA ID Number TXR000080274									
7. Transporter 2 Company Name GRUENE TRANSPORTATION, LLC		U.S. EPA ID Number TXR000080576									
8. Designated Facility Name and Site Address NSSI 5711 ETHRIDGE, HOUSTON, TX 77087		U.S. EPA ID Number TXD982560294									
Facility's Phone: 713.641.5331											
GENERATOR	9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))				10. Containers		11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes	
						No.	Type				
	X	1. UN1760, RQ, Waste Corrosive liquids, n.o.s. (hydrochloric acid), 8, PGII ERG #154				1	DF	55	G	CESQ001H D002	
	X	2. UN2813, Waste Water-reactive solid, n.o.s. (calcium, magnesium ribbon), 4.3, PGII ERG #138				1	DF	5	G	CESQ001H D003	
	X	3. UN1479 RQ, Waste Oxidizing solid, n.o.s. (chromium nitrate) 5.1, PGII ERG #140				1	DF	5	G	CESQ001H D007 D001	
X	4. UN1325, Waste Flammable solids, organic, n.o.s. (activated charcoal), 4.1, PGII ERG #133				1	DF	55	G	CESQ001H D001		
14. Special Handling Instructions and Additional Information 1. LP1 * 4. LP6 2. LP5 * 5. LP8 INFOTRAC Chemical Services Contract # 93531											
15. 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. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.											
Generator's/Offeror's Printed/Typed Name <i>Teresa Flores - Agent for Generator</i>											
Signature <i>[Signature]</i>											
Month Day Year 4 12 23											
INT'L	16. International Shipments ☐ Import to U.S. ☐ Export from U.S. Part of entry/exit: _____ Date leaving U.S.: _____										
	Transporter signature (for exports only): _____										
TRANSPORTER	17. Transporter Acknowledgment of Receipt of Materials										
	Transporter 1 Printed/Typed Name <i>Enviromaid Industrial Systems/Services</i>										
	Signature <i>[Signature]</i>										
DESIGNATED FACILITY	Month Day Year 11 12 23										
	Transporter 2 Printed/Typed Name _____ Signature _____ Month Day Year _____ _____ _____										
	18. Discrepancy										
18a. Discrepancy Indication Space ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection Manifest Reference Number: _____											
18b. Alternate Facility (or Generator) U.S. EPA ID Number _____											
Facility's Phone: _____											
18c. Signature of Alternate Facility (or Generator) _____ Month Day Year _____											
19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)											
1. _____ 2. _____ 3. _____ 4. _____											
20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a											
Printed/Typed Name _____ Signature _____ Month Day Year _____											

APPENDIX 3. CRRC FOLLOW-UP PHOTOS



Designated Used Battery Storage Area



Batteries with Removed Dates

UNIVERSAL WASTE
USED OIL

USED OIL