Compliance and enforcement for hazardous waste facilities in the Texas Hill Country

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In 1976, the Resource Conservation and Recovery Act (RCRA) gives the EPA the authority to control hazardous waste from the "cradle-to-grave." This includes the generation, transportation, treatment, storage, and disposal of hazardous waste https://www.epa.gov/laws-regulations/summary-resource-conservation-and-recovery-act. In 1984, the Federal Hazardous and Solid Waste Amendments to RCRA focused on waste minimization and phasing out land disposal of hazardous waste as well as corrective action for releases. Some of the other mandates of this law include increased enforcement authority for EPA, more stringent hazardous waste management standards, and a comprehensive underground storage tank program. In 1986, additional amendments to RCRA enabled EPA to address environmental problems that could result from underground tanks storing petroleum and other hazardous substances.

The EPA website https://echo.epa.gov provides a database of all RCRA regulated facilities, including compliance and enforcement information and data. The purpose of this report is to present, for the Hill Country area, a list of all hazardous waste facilities and summaries of compliance and enforcement for the facilities.

A summary of the compliance and enforcement history for the facilities, as of September 25, 2018, is as follows:

- 1198 hazardous waste facilities exist in the Hill Country area.
- 14 of the facilities are currently non compliant and an additional 2 facilities have significant violations.
- During the last 3 years, 9 of the facilities were non compliant every quarter.
- During the last 3 years, there were 276 total quarters of non compliance for the 1198 facilities.
- During the last 3 years, 5 of the facilities had at least one quarter with significant non compliance and 2 of those had significant non compliance every quarter.
- During the last 5 years, only 108 total inspections were made of the 198 facilities. 1117
 (93%) of the facilities had no inspections during the period.
- During the last year, about 492,000 pound of chemicals were released on land and more than 5 million pounds of chemicals were transferred off site.
- During the past 5 years, only 47 informal enforcement actions were taken against the facilities and 29 formal enforcement actions were made.
- During the past 5 years, total penalties against all facilities were about \$991,000.

The following tables present, for selected column headings, the facilities with the most infractions. A table presenting summary compliance and enforcement for each facility in the Hill Country is presented at the end of this report.

Facilities with current status of Noncompliance or Significant Violation

			Population	
			Density	Current
			per square mile	Compliance
Facility Name	City	County	within 3 miles	Status
ALAMO ENVIRONMENTAL	SAN ANTONIO	BEXAR	685.32	Significant Violation
RIVER CITY METAL FINISHING	SAN ANTONIO	BEXAR	1728.34	Significant Violation
BROOKS CITY BASE	BROOKS CITY BASE	BEXAR	1514.86	Noncompliance
UNIVERSAL PRESSURE PUMPING	ELMENDORF	BEXAR	234.28	Noncompliance
M7 AEROSPACE	SAN ANTONIO	BEXAR	2931.17	Noncompliance
ASTRO PLATING	SAN ANTONIO	BEXAR	5232.15	Noncompliance
NEWELL RECYCLING OF SAN ANTONIO	SAN ANTONIO	BEXAR	5510.22	Noncompliance
MOONEY INTERNATIONAL KERVILLE	KERRVILLE	KERR	136.16	Noncompliance
TEXAS LEHIGH CEMENT	BUDA	HAYS	597.7	Noncompliance
DEPOSITION TECHNOLOGY	AUSTIN	TRAVIS	3990.81	Noncompliance
MACYS LA CANTERA	SAN ANTONIO	BEXAR	1659.13	Noncompliance
MACYS SOUTH PARK CENTER	SAN ANTONIO	BEXAR	3932.72	Noncompliance
MACYS INGRAM PARK	SAN ANTONIO	BEXAR		Noncompliance
DANNY PRIESS	FREDONIA	MASON		Noncompliance
ADVANCED INTEGRATED TECHNOLOGY	SAN ANTONIO	BEXAR	2943.57	Noncompliance
SURE CAST	BURNET	BURNET	262.05	Noncompliance

Facilities with at least 6 Non Compliant quarters during the last 3 years

Facility Name	City	County	Population Density per square mile within 3 miles	Number Quarters Non Compliant Last 3 yrs
ALAMO ENVIRONMENTAL	SAN ANTONIO	BEXAR	685.32	12
RIVER CITY METAL FINISHING	SAN ANTONIO	BEXAR	1728.34	12
BROOKS CITY BASE	BROOKS CITY BASE	BEXAR	1514.86	12
UNIVERSAL PRESSURE PUMPING	ELMENDORF	BEXAR	234.28	12
M7 AEROSPACE	SAN ANTONIO	BEXAR	2931.17	12
ASTRO PLATING	SAN ANTONIO	BEXAR	5232.15	12
NEWELL RECYCLING OF SAN ANTONIO	SAN ANTONIO	BEXAR	5510.22	12
MOONEY INTERNATIONAL KERVILLE	KERRVILLE	KERR	136.16	12
DANNY PRIESS	FREDONIA	MASON		12
TEXAS LEHIGH CEMENT	BUDA	HAYS	597.7	11
DEPOSITION TECHNOLOGY	AUSTIN	TRAVIS	3990.81	10
MACYS LA CANTERA	SAN ANTONIO	BEXAR	1659.13	9
MACYS SOUTH PARK CENTER	SAN ANTONIO	BEXAR	3932.72	9
MACYS INGRAM PARK	SAN ANTONIO	BEXAR		8
M2 GLOBAL TECHNOLOGY	SAN ANTONIO	BEXAR	3730.42	8
WOOD INDUSTRIES PA 1299	SAN ANTONIO	BEXAR	492.76	7
METHODIST HOSPITAL	SAN ANTONIO	BEXAR	4732.37	7
CENTEX PLATING	AUSTIN	TRAVIS	4977.81	7
LTD MATERIAL	AUSTIN	TRAVIS	2339.64	7
MT TEXAS	SAN ANTONIO	BEXAR	3008.31	7
BORACAY NEW BRAUNFELS	NEW BRAUNFELS	COMAL	277.44	6

Facilities with significant Non Compliance quarters during the last 3 years

Facility Name	City	County	Population Density per square mile within 3 miles	Quarters with Significant Non Compliance Last 3 yrs
ALAMO ENVIRONMENTAL	SAN ANTONIO	BEXAR	685.32	12
RIVER CITY METAL FINISHING	SAN ANTONIO	BEXAR	1728.34	12
LTD MATERIAL	AUSTIN	TRAVIS	2339.64	7
WOOD INDUSTRIES PA 1299	SAN ANTONIO	BEXAR	492.76	2
TEXAS FLUORESCENCE LABORATORIES	AUSTIN	TRAVIS	1096.94	1

Facilities with Chemical Land Releases last year

Facility Name	City	County	Population Density per square mile within 3 miles	Chemical Land Releases (in pounds)
CALAVERAS LAKE PLANT	SAN ANTONIO	BEXAR	146.22	389,298
CAMP BULLIS TRAINING SITE	SAN ANTONIO	BEXAR	37.43	92,204
RANDOLPH AFB AIR EDUCATION AND TRAINING COMMAND	RANDOLPH AFB	BEXAR	1635.1	5,317
CAMP STANLEY STORAGE ACTIVITY MCAAP JMC	BOERNE	BEXAR	502.38	4,518
TXI HUNTER CEMENT PLANT	NEW BRAUNFELS	COMAL	114.45	915
AUSTIN WHITE LIME MCNEIL PLANT AND QUARRY	AUSTIN	TRAVIS	2375.46	178
SAN ANTONIO WORKS	ELMENDORF	BEXAR	246.13	0.9

Facilities transferring at least 100,000 pounds of chemicals off site last year

Facility Name	City	County	Population Density per square mile within 3 miles	Off Site Chemical Transfer (in pounds)
SAMSUNG AUSTIN SEMICONDUCTOR	AUSTIN	TRAVIS	1258.78	1,398,047
ICU MEDICAL FLEET SERVICES	AUSTIN	TRAVIS	2548.79	1,156,653
AZZ GALVANIZING SAN ANTONIO	SAN ANTONIO	BEXAR	1417.8	576,067
JOHNSON CONTROLS BATTERY GROUP SAN ANTONIO	SAN ANTONIO	BEXAR	3453.23	508,623
CALAVERAS LAKE PLANT	SAN ANTONIO	BEXAR	146.22	289,986
NXP USA	AUSTIN	TRAVIS	1941.71	238,855
TOYOTA MOTOR MANUFACTURING TEXAS	SAN ANTONIO	BEXAR	58.61	128,228
ENTEGRIS	BURNET	BURNET	258.99	120,982
TOWERJAZZ TEXAS	SAN ANTONIO	BEXAR	3794.97	116,000
NXP USA	AUSTIN	TRAVIS	2115.35	107,056

Note: An additional 29 facilities transferred less than 100,000 pounds of chemicals off site last year.

Facilities with at least two Informal Enforcement Actions during the last 5 years

			Population	Informal
			Density	Enforcement
			per square mile	Actions
Facility Name	City	County	within 3 miles	Last 5 yrs
CALUMET SAN ANTONIO REFINERY	SAN ANTONIO	BEXAR	2974.1	5
REDS INDOOR RANGE NORTH	PFLUGERVILLE	TRAVIS	3021.23	3
DANNY PRIESS	FREDONIA	MASON		2
TEXAS FLUORESCENCE LABORATORIES	AUSTIN	TRAVIS	1096.94	2
JULIO S AND MARIA I ALONSO DBA A-1	VON ORMY	BEXAR		2
NYTEX AUTOMATIC PRODUCTS	FREDERICKSBURG	GILLESPIE	290.08	2
CENTEX PLATING	AUSTIN	TRAVIS	4977.81	2

Note: An additional 29 facilities had one Informal Enforcement Action.

Facilities with at least one Formal Enforcement Action during the last 5 years

Facility Name	City	County	Population Density per square mile within 3 miles	Formal Enforcement Actions Last 5 yrs
TEXAS FLUORESCENCE LABORATORIES	AUSTIN	TRAVIS	1096.94	3
COX MANUFACTURING	SAN ANTONIO	BEXAR	2075.21	2
NYTEX AUTOMATIC PRODUCTS	FREDERICKSBURG	GILLESPIE	290.08	2
CENTEX PLATING	AUSTIN	TRAVIS	4977.81	2
REDS INDOOR RANGE NORTH	PFLUGERVILLE	TRAVIS	3021.23	2
CALUMET SAN ANTONIO REFINERY	SAN ANTONIO	BEXAR	2974.1	2
UNIVERSAL PRESSURE PUMPING	ELMENDORF	BEXAR	234.28	1
TEXAS LEHIGH CEMENT	BUDA	HAYS	597.7	1
DEPOSITION TECHNOLOGY	AUSTIN	TRAVIS	3990.81	1
MACYS LA CANTERA	SAN ANTONIO	BEXAR	1659.13	1
MACYS SOUTH PARK CENTER	SAN ANTONIO	BEXAR	3932.72	1
MACYS INGRAM PARK	SAN ANTONIO	BEXAR		1
WEATHERFORD SATX HUB	SAN ANTONIO	BEXAR		1
OMNICARE SAN ANTONIO	SAN ANTONIO	BEXAR	3943.4	1
TLMI	AUSTIN	TRAVIS	4278.92	1
APS-SUMMIT CARE PHARMACY AUSTIN	AUSTIN	TRAVIS	4132.83	1
SAN ANTONIO TESTING LABORATORY	SAN ANTONIO	BEXAR	5535.82	1
PATHOLOGY REFERENCE LABORATORY	SAN ANTONIO	BEXAR	4462	1
SYNERGISTIC ENVIRONMENTAL SYSTEMS SES	SAN ANTONIO	BEXAR	519.21	1
MEMORIAL HERMANN TMC	HOUSTON	HAYS	5895.77	1
JULIO S AND MARIA I ALONSO DBA A-1	VON ORMY	BEXAR		1
ALERE TOXICOLOGY SERVICES	AUSTIN	TRAVIS	3301.08	1

Facilities penalized with fines for violations during the last 5 years

			Population	Penalty
			Density	Fines
			per square mile	(in dollars)
Facility Name	City	County	within 3 miles	Last 5 yrs
UNIVERSAL PRESSURE PUMPING	ELMENDORF	BEXAR	234.28	501,175
ALERE TOXICOLOGY SERVICES	AUSTIN	TRAVIS	3301.08	186,226
TEXAS LEHIGH CEMENT	BUDA	HAYS	597.7	72,512
CENTEX PLATING	AUSTIN	TRAVIS	4977.81	68,938
DEPOSITION TECHNOLOGY	AUSTIN	TRAVIS	3990.81	57,808
CALUMET SAN ANTONIO REFINERY	SAN ANTONIO	BEXAR	2974.1	37,225
REDS INDOOR RANGE NORTH	PFLUGERVILLE	TRAVIS	3021.23	18,001
COX MANUFACTURING	SAN ANTONIO	BEXAR	2075.21	15,188
NYTEX AUTOMATIC PRODUCTS	FREDERICKSBURG	GILLESPIE	290.08	12,750
SAN ANTONIO TESTING LABORATORY	SAN ANTONIO	BEXAR	5535.82	10,768
TEXAS FLUORESCENCE LABORATORIES	AUSTIN	TRAVIS	1096.94	6,300
JULIO S AND MARIA I ALONSO DBA A-1	VON ORMY	BEXAR		3,883