



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6

1445 ROSS AVENUE, SUITE 1200

DALLAS, TEXAS 75202-2733

February 21, 2019

CERTIFIED MAIL: RETURN RECEIPT REQUESTED: 700801500003 0411 5283

Craig Smethie
Plant Manager
Henry Company
3802 Miller Park Road
Garland, Texas 75042

Re: EPA RCRA Compliance Evaluation Inspection – October 30, 2018; EPA ID#
TXR000084812 – Henry Company – Garland, Texas

Dear Mr. Smethie,

On October 30, 2018, the United States Environmental Protection Agency (EPA) conducted an announced Compliance Evaluation Inspection (CEI) at the Henry Company located in Garland, Texas. I would like to thank you for the time and the courtesy you and your staff extended to our inspectors. Enclosed, please find a copy of the CEI Report which chronicles the inspection findings. A copy of this CEI Report will be transmitted separately to the Texas Commission on Environmental Quality (TCEQ).

Based on the information contained in the enclosed inspection report, EPA will not be pursuing enforcement action under the Resource Conservation and Recovery Act (RCRA).

If you have any questions regarding this matter, please contact Mr. Bill Mansfield of my staff at (214) 665-8321 or email to Mansfield.william@epa.gov.

Sincerely,

A handwritten signature in dark ink, appearing to read "H. Troy Stuckey", is written above the typed name.

H. Troy Stuckey Ph.D.

Chief

Waste Compliance III Section (6EN-H3)

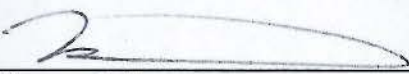
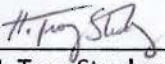
Waste Enforcement Branch

Enclosure

cc: James Gradney, james.gradney@tceq.texas.gov

cc: Casey Grunnet, casey.grunnet@tceq.texas.gov

**Region 6 Compliance Assurance and Enforcement Division
INSPECTION REPORT**

Inspection Date(s):	10/30/2018		
Media:	RCRA		
Regulatory Program(s)	Hazardous Waste		
Company Name:	Henry Company		
Facility Name:	Henry Company		
Facility Physical Location:	3802 Miller Park Road		
(city, state, zip code)	Garland, TX		
Mailing address:	Same		
(city, state, zip code)	Same		
County/Parish:	Dallas		
Facility Contact:	Craig Smethie	Plant Manager	
	csmethie@henry.com		
FRS Number:	None		
Identification/Permit Number:	None		
Media Number:	TXR000084812		
NAICS:	324122 Asphalt Shingle and Coating Materials Manufacturing		
SIC:	None		
Personnel participating in inspection:			
Bill Mansfield	EPA/6EN-H3	Inspector	214-665-8321
EPA Lead Inspector Signature/Date			
	Bill Mansfield		Date 02/21/19
Supervisor Signature/Date			2-21-19
	H. Troy Stuckey Ph.D.		Date

Section I – INTRODUCTION

PURPOSE OF THE INSPECTION

I, Bill Mansfield, EPA Region 6 inspector, arrived at the Henry Company facility at 9:25 AM on 10/30/18 for an announced inspection. I met with Michael De La Cruz/Operations Manager and David Vives/Environmental Health and Safety Coordinator for an opening conference. I presented my credentials to Michael and told him this was an EPA inspection to determine compliance with the Resource Conservation and Recovery Act (RCRA). The scope of the inspection is a full Compliance Evaluation Inspection (CEI).

FACILITY DESCRIPTION

Henry Company in Garland, Texas is a manufacturing facility that produces asphalt roofing materials and coatings. The facility employees approximately 30 people.

Section II - OBSERVATIONS

I observed tank T58 (Attachment 1, photo 2), which was the former reused mineral spirits tank and tank 61 (Attachment 1, photo 1), which is an oil tank. Reused mineral spirits were used to make products in the past, however the facility discontinued the use of reused mineral spirits in 2016 and tank T58 was empty during the inspection. I then observed 12 totes (Attachment 1, photo 3) containing a bad batch of product awaiting disposal as waste. Michael said they use process knowledge to determine the waste is non-hazardous and provided me with safety data sheets as part of the determination. Michael also said the facility produces a bad batch 3-4 times a year, which consists of 6 to 8, 275-gallon totes each time. I then observed drip buckets that collect asphalt leaks at pump connections. Michael said when the material in the buckets is dry, it is disposed of in the trash.

During the inspection I reviewed shipping documents for waste and some products coming in to the facility. I also reviewed hazardous waste determinations.

Section III – AREAS OF CONCERN

I observed no areas of concern at the time of the inspection.

Section IV – FOLLOW UP

No information was received by EPA after exiting the Facility on 10/30/18.

Section V – LIST OF APPENDICES

Appendix 1 – Photograph log

Appendix 1

Photograph Log



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 1

Location: Henry Co

City: Garland

County/Parish: Dallas

State: Texas



Photo File Name: P1

Date of Photo: October 30, 2018

Time: 10:05 a.m.

Photographer: Bill Mansfield, EPA Inspector

Description: T61 Oil tank



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 2

Location: Henry Co		
City: Garland	County/Parish: Dallas	State: Texas



Photo File Name: P2

Date of Photo: October 30, 2018

Time: 10:07 a.m.

Photographer: Bill Mansfield, EPA Inspector

Description: Tank T58 former reused mineral spirits tank.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 3

Location: Henry Co

City: Garland

County/Parish: Dallas

State: Texas



Photo File Name: P3

Date of Photo: October 30, 2018

Time: 10:15 a.m.

Photographer: Bill Mansfield, EPA Inspector

Description: 12 totes of bad batch of product awaiting disposal (non-hazardous per waste determination)