

Region 6 - Enforcement & Compliance Assurance Division
INSPECTION REPORT

Inspection Date(s):	08/18/2021	
Media Program:	RCRA	
Regulatory Program(s)	Hazardous Waste	
Company Name:	Custom Building Products, Inc.	
Facility Name:	Custom Building Products, Inc.	
Facility Physical Location:	1713 109 th Street	
(city, state, zip code)	Grand Prairie, TX 75050	
Mailing address:	--	
(city, state, zip code)	--	
County/Parish:	Dallas	
Facility Phone Number	972-641-6996	
Facility Contact:	Tim Spencer	Plant Manager
FRS Number:	NA	
Identification/Permit Number:	TX0000116376	
Media Identifier Number:	NA	
NAICS:	32739 - OTHER CONCRETE PRODUCT MANUFACTURING (20 Staff)	
SIC:	--	
Personnel participating in inspection:		
Debra Pandak	EPA Region 6	Inspector
EPA Lead Inspector Signature/Date		8/24/2021
	Debra Pandak	Date
Supervisor Signature/Date		8/24/21
	Jeff Yurk	Date

Section I – INTRODUCTION

PURPOSE OF THE INSPECTION

EPA Region 6 inspector Debra Pandak arrived at Custom Building Products, Inc. at 1:30 pm on 08/18/2021 for an unannounced inspection. I met with Tim Spencer, Plant Manager of Custom Building Products, Inc. (Custom) for an opening conference. I presented my credentials to Mr. Spencer and informed him that this was an EPA inspection to evaluate the facilities compliance with the Resource Conservation and Recovery Act (RCRA) regulations.

The scope of the inspection is a Compliance Evaluation Inspection (CEI) and includes evaluation of the facility's hazardous waste management activities.

FACILITY DESCRIPTION

Custom Building Products is North America's industry leader in flooring preparation products and tile and stone installation systems for residential and commercial projects.

The facility is registered as Very Small Quantity Generator (VSQG) since 2003.

Section II - OBSERVATIONS

EPA's review of RCRAinfo online records show Custom generates the following hazardous wastes:

- Characteristic: D001 D002 D003 D005 D006 D007 D008 D009 D018 D039
- Listed Waste: U019 U188

Texas Commission on Environmental Quality (TCEQ) registration data show 27 active wastes registered. TCEQ Annual Waste Summaries (AWS) were also reviewed for hazardous waste generation volumes.

Based on waste generation in 2018, 2019 and 2020, Custom potentially generated quantities of hazardous waste triggering Small Quantity Generator status requirements (greater than 100 kgs/month generation rate).

2018 TCEQ AWS	2019 TCEQ AWS	2020 TCEQ AWS
239 kgs/month	265.5 kgs/month	129 kgs/month
Manifest Data:		Kgs reported
3/12/2019	019878456JJK	1814
5/2/2019	020239346JJK	45
5/2/2019	020239344JJK	1269
1/3/2020	021376434JJK	113
2/13/2020	016045944JJK	317

10/14/2020	021046485JJK	11
10/14/2020	022083039JJK	1088

Section III – AREAS OF CONCERN

I provided a Notice of Potential Violation and Opportunity to Confer (NOPVOC) letter to Tim Spencer. The NOPVOC identified the following concerns:

- Notification – Failure to notify the EPA or authorized state adequately describing the hazardous waste generating activity at the Facility pursuant to Section 3010(a) of RCRA, 42 U.S.C. § 6930(a), and the regulation at 30 TAC 335.6.
- Hazardous Waste Determination – Failure to accurately characterize solid waste/hazardous waste pursuant to 40 CFR Part 261 Subpart C, 40 CFR Part 262.11.

EPA requested information specific to facility operations and hazardous waste management as part of the NOPVOC letter.

Section IV – FOLLOW UP

EPA extended Custom the opportunity to advise the Agency, via a conference call, or in writing via email, of any further information the EPA should consider with respect to the potential violations of the RCRA and the implementing regulations.

Custom has 14 days to notify EPA if interested in participating in an opportunity to confer with the Agency.