

Region 6 - Enforcement & Compliance Assurance Division
INSPECTION REPORT

Inspection Date(s):	08/25/2021	
Media Program:	RCRA	
Regulatory Program(s)	Hazardous Waste	
Company Name:	Weathermatic	
Facility Name:	Weathermatic	
Facility Physical Location:	3301 W. KINGSLEY RD	
(city, state, zip code)	Garland, TX 75041	
Mailing address:	P.O. Box 180205	
(city, state, zip code)	Dallas, TX 75218-0205	
County/Parish:	Dallas	
Facility Phone Number	972-278-6131	
Facility Contact:	Todd Grant	Vice President of Operations
FRS Number:	NA	
Identification/Permit Number:	TXD007333255	
Media Identifier Number:	NA	
NAICS:	332919 Other Metal Valve and Pipe Fitting manufacturing	
SIC:	--	
Personnel participating in inspection:		
Debra Pandak	EPA Region 6	Inspector
EPA Lead Inspector Signature/Date		
	Debra Pandak	Date
Supervisor Signature/Date		
	Jeff Yurk	Date

Section I – INTRODUCTION

PURPOSE OF THE INSPECTION

I, Debra Pandak, EPA Region 6 inspector arrived at Weathermatic at 2:05 pm on 08/25/2021 for an unannounced inspection. I met with Todd Grant, Vice President of Operations for an opening conference. I presented my credentials and informed Mr. Grant 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

Weathermatic manufactures sprinkler systems and controllers. Weathermatic has been operational for 75 years.

The facility registered as Very Small Quantity Generator (VSQG) in 2013, until 02/2019 when Weathermatic was registered as a Small Quantity Generator (SQG). In June 2019, they reverted to a VSQG.

Section II - OBSERVATIONS

EPA's review of RCRAInfo database show Weathermatic generates hazardous wastes from cleaning parts in the manufacturing process or service activities. Wastes include oil water emulsions, non-halogenated solvents, spent acids and caustics. One container storage area is used on-site.

EPA's RCRAInfo database and Texas Commission on Environmental Quality (TCEQ) registration data show Weathermatic registered characteristic waste codes: D001, D002, D008, D018, D039, D040.

TCEQ Annual Waste Summaries (AWS) were also reviewed for hazardous waste generation volumes.

Based on waste generation in 2020, Weathermatic appears to have generated quantities of hazardous waste triggering Small Quantity Generator status requirements (greater than 100 kgs/month generation rate). A copy of the associated manifest was emailed to Mr. Grant following the inspection.

Manifest Date:	Manifest No.	Kgs reported
10/30/2020	001078095 WAS	1,451 kg

Section III – AREAS OF CONCERN

I provided a Notice of Potential Violation and Opportunity to Confer (NOPVOC) letter to Mr. Grant. 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 conduct a hazardous waste determination pursuant to 40 C.F.R. § 262.11 and 30 TAC 335.62.

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

Section IV – FOLLOW UP

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

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