



4404 Haygood Street  
Houston, Texas 77022  
P.O. Box 7303  
Houston, Texas 77248

October 28, 2020

USEPA Docket No. RCRA-06-2020-0952

U.S. EPA Region 6  
1201 Elm Street, Suite 500  
Enforcement and Compliance Assurance Division  
ATIN: Adolphus Talton  
Dallas, TX 75270

**Re: Administrative Compliance Order on Consent ("ACOC")**

Dear Mr. Talton:

On August 5, 2020 WFI International – a Bonney Forge Company (WFI), located at 4407 Haygood Street, Houston, Harris County, Texas, received an Administrative Compliance Order on Consent ("ACOC"). The ACOC alleges that WFI is Small Quantity Generator (SQG) of hazardous waste, therefore is subject to applicable 40 CFR Subchapter I – Solid Wastes and 30 TAC 335 Industrial Solid Waste and Municipal Hazardous Waste regulations.

We have endeavored to fully comply with the below ACOC consent/compliance order as follows including provision of detailed attachments as listed.

Section VI. *Compliance Order* describes the actions WFI is required to undertake and to provide to EPA the following documentation to support and demonstrate that they have met their compliance requirements and obligations.

- Assessed all of the solid wastes' streams generated at the facility and determined the accurate waste codes for each stream.
  - o A spreadsheet with the generated waste streams and assigned appropriate waste codes to each.

**See Attachment A**

- Developed and Implemented a Standard Operation Procedure (SOP) in the form of a Waste Management Plan (WMP) that describes the procedures for:
  - o Making hazardous waste determinations.
  - o Managing hazardous wastes.
  - o Reporting requirements
  - o Transportation requirements
  - o Disposal requirements
  - o Preparing manifest documents
  - o Land Disposal Restrictions

**See Attachment B**

- As part of RCRA Section 3010 Notification, based on WFI's current generation of hazardous waste we fall under VSQG status and therefore do not have to register and obtain an EPA ID number. However, WFI has established a Solid Waste Registration (SWR) number with the Texas State of Environmental Quality via the State of Texas Environmental Electronic Reporting System (STEERS) because WFI manages Industrial Class 1 non-hazardous waste.

**See Attachment C**

"I certify under the penalty of law that this document and all of its attachments were prepared by me or under my direct supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

Please contact us should you have any questions or need clarifications on any of the attachments or documents we have provided.

Respectfully,

A handwritten signature in dark ink, appearing to read "Glenn L. Gribble". The signature is stylized with a large initial "G" and a cursive script.

Glenn L. Gribble  
Vice President, Human Resources & Safety

GG/mp/ 1  
Attachments