



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6  
1445 ROSS AVENUE, SUITE 1200  
DALLAS TX 75202-2733

DEC 02 2016

Mr. Brian Nichols  
Katy Industries, Inc.  
11840 Westline Industrial Drive  
Suite 200  
St. Louis, Missouri 63146

Re: Ready for Reuse Determination  
W.J. Smith Wood Preserving Company  
1700 West Morton Street  
Denison, TX 75020  
EPA ID Number: TXD066368879

Dear Mr. Nichols:

The United States Environmental Protection Agency (EPA) Region 6 has determined that the W.J. Smith Wood Preserving Company site (the "Property") is Ready for Reuse. A Ready for Reuse Determination is an acknowledgement that environmental conditions on the Property are protective of human health and the environment based on its current and anticipated future use.

The Property was historically used to pressure treat railroad ties, utility poles, fence posts and other wood products with creosote and other special creosote solutions to preserve these products against decay. Pressure treating operations began in 1909 and ceased in 1991. Subsequently, the majority of the structures at the Property were decommissioned and removed between May 1991 and February 1992. This Ready for Reuse Determination is being issued for Parcels 1, 2, 3, and 4 of the Property, depicted in Enclosure 1 to this letter. The parcels cover approximately 71.2, 8.3, 5.6, and 15.8 acres, respectively.

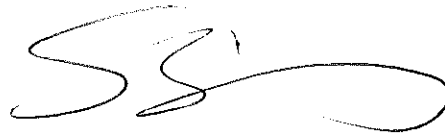
With this Ready for Reuse Determination, EPA Region 6 agrees that Katy Industries, Inc. has successfully conducted investigation, remediation and risk management activities, and that environmental conditions at the Property are protective of human health and the environment based on its current and anticipated future uses. Specifically, Parcel 1 is protective for residential use, whereas Parcels 2, 3, and 4 are protective for commercial/industrial use. The Ready for Reuse Basis of Decision (BOD) is provided as Enclosure 2 to this correspondence. Information concerning the current environmental conditions at the site and risk management activities to ensure protectiveness are summarized in Appendix F to the BOD. Copies of relevant documents are available in electronic format on the compact disk labeled as Attachment

I to the BOD, on file at the Grayson County Clerk's Office in the W. J. Smith Wood Preserving Company deed records.

If conditions on the Property change (e.g. land use is altered or new site receptors are identified) or additional impacted media are discovered, the current owner/operator will notify TCEQ and it may become necessary to perform additional investigation and/or remediation to ensure continued protectiveness. The undersigned expressly reserves all rights and authorities to require further action by owners or operators if new or additional information is discovered that impacts this Ready for Reuse Determination, whether such information is known as of this date or becomes available in the future.

Congratulations on this most noteworthy achievement!

Sincerely,

A handwritten signature in black ink, appearing to read 'SS', with a long horizontal flourish extending to the right.

Susan G. Spalding  
Associate Director  
Hazardous Waste Branch  
Multimedia Division

Enclosures

ENCLOSURE 1

PARCEL LAYOUT  
FORMER W.J. SMITH WOOD PRESERVING COMPANY PROPERTY



**LEGEND**

APPROXIMATE PROPERTY BOUNDARY

DRAINAGE DITCH

PARCEL 1 - RAW WOOD & FINISHED PRODUCT STORAGE / UNUSED AREA

PARCEL 2 - LAND TREATMENT UNIT (LTU)

PARCEL 3 - IMPACTED DRAINAGE DITCH

PARCEL 4 - CREOSOTE STORAGE AND USE AREA



Title: **PARCEL LAYOUT**  
**FORMER W.J. SMITH WOOD PRESERVING CO. PROPERTY**  
 1700 WEST MORTON STREET  
 DENSON, TEXAS

Prepared For: **KATY INDUSTRIES, INC.**

<b>ROUX</b> ROUX ASSOCIATES, INC. Engineering & Construction	Compiled by: TZ	Date: 09/23/2016	FIGURE
	Prepared by: TZ	Scale: AS SHOWN	
	Project Mgr: TVA	Project:	3
	File: FIGURE_1 (PROPOSED PARCELS).DWG		

ENCLOSURE 2

READY FOR REUSE  
BASIS OF DECISION