REGION 5
CHICAGO, IL 60604

MEMORANDUM

SUBJECT: CLEAN AIR ACT INSPECTION REPORT
H. Kramer & Co., Chicago, Illinois

FROM: DeMarkus Hodge, Environmental Engineer
AECAB (MI/WI)

THRU: Sarah Marshall, Section Supervisor
AECAB (MI/WI)

TO: File

BASIC INFORMATION

Facility Name: H. Kramer & Co.

Facility Location: 1345 West 21st St, Chicago, IL 60608

Date of Inspection: February 4, 2025

EPA Inspector(s):
1. DeMarkus Hodge, Environmental Engineer
2. Charles Hall, Environmental Engineer

Other Attendees:
1. Cory Henry, Plant Superintendent
2. Adam Chapman, Executive VP
3. Sanchay Kumar, Safety Manager

Contact Email Address: henryc@hkramer.com

Purpose of Inspection: The purpose of this inspection is to determine compliance with 40 C.F.R. Part 63, Subpart TTTTTT

Facility Type: Secondary nonferrous metals processing facility

Regulations Central to Inspection: 40 C.F.R. Part 63, Subpart TTTTTT

Arrival Time: 9:40 AM CST
Departure Time: 12:00 PM CST

Inspection Type:
☒ Unannounced Inspection
☐ Announced Inspection

OPENING CONFERENCE

☒ Presented Credentials
☒ Stated authority and purpose of inspection
☒ Provided Small Business Resource Information Sheet
☐ Small Business Resource Information Sheet not provided.
☒ Provided CBI warning to facility
Was any information collected during the inspection claimed as CBI?
☐ Yes ☒ No.

The following information was obtained verbally from H. Kramer & Co. staff unless otherwise noted.

Process Description:

H. Kramer & Co. (H. Kramer) describes itself as a secondary nonferrous metals processing facility. H. Kramer produces brass ingots that have a wide range of applications. H. Kramer uses a variety of scrap to charge in their melting operations. H. Kramer charges scrap that requires less processing of the material in a coreless induction furnace. It charges the scrape that needs more refinement in a gas rotary furnace. H. Kramer has two gas rotary furnaces and three coreless induction furnaces. After the H. Kramer charges the scrap in the furnaces, the scrap is melted at the desired temperature. Once the heat is within specification, it pours the metal into molds, cools, and stacks the metal on pallets for shipment to customers. H. Kramer routes the emissions from the gas rotary furnaces to the north and south baghouses, while the emissions for the coreless induction furnaces are sent to Baghouse #4. The north and south baghouses have a HEPA filter to further control emissions from the scrap melting operations.

Staff Interview: H. Kramer operates the rotary furnaces 5 days a week and the coreless induction furnaces 6 days a week. H. Kramer employs 105 employees. H. Kramer uses a bar code to identify and maintain scrap in their inventory. It scans each scrap shipment and analyzes them to fulfill different material compositions required for orders. The coreless induction furnaces run completely on electricity. The gas rotary furnaces have a water jacket on the charge door and the burner is air cooled due to increased safety and efficiency. H. Kramer produces most of the product in the gas rotary furnaces.

TOUR INFORMATION

EPA Toured the Facility: Yes

Data Collected and Observations:
During the inspection, EPA visited the scrap storage area, gas rotary furnaces, coreless induction furnaces, and the baghouses associated with the gas rotary and coreless induction furnaces. EPA observed a variety of scrap used for producing brass ingots in the scrap storage area. EPA observed the coreless induction furnaces while the scrap melting operation occurred. During the scrap melting operation, the coreless induction furnace charged scrap using a charging box. In the coreless induction area, there were multiple emergency stops (e-stop) around the furnaces. H. Kramer uses the e-stops to manually halt the furnace operation. Next, EPA observed the melting and pouring operation occuring in the gas rotary furnace #2.

Photos and/or Videos: were taken during the inspection and are listed in Appendix A.

Field Measurements: were not taken during this inspection.

CLOSING CONFERENCE

☒ Provided U.S. EPA point of contact to the facility

Requested documents:

- Operational logs for all furnaces from February 2024 – February 2025;
- Maintenance and repair records for Rotary furnaces #1 and #2 from February 2024 – February 2025;
- Charge Sheets for Rotary furnaces #1 and #2 from February 2024 – February 2025;
- Most recent performance test for all baghouses;
- Monitoring plan for all baghouses;
- Pressure drop over time data for all baghouses from November 2024 – February 2025;
- Baghouse Inspections documents for all baghouses from February 2024 – February 2025; and
- Facility Map.

DIGITAL SIGNATURES

Report Author: DEMARKUS HODGE
Digitally signed by DEMARKUS HODGE
Date: 2025.03.18 07:27:05 -05'00'

Section Supervisor: SARAH MARSHALL
Digitally signed by SARAH MARSHALL
Date: 2025.03.18 07:32:34 -05'00'

APPENDICES

1. Appendix A: Digital Image Log and Digital Video Log

APPENDIX A: DIGITAL IMAGE LOG AND DIGITAL VIDEO LOG

Inspector Name: Charles Hall **Archival Record Location:** ***Electronic Record Center (ERC)***

Image Number	File Name	Date and Time (CST)	Description of Image
1	P2040001.JPG	2/4/2025 - 11:05 AM	Electric Furnace
2	P2040002.JPG	2/4/2025 - 11:06 AM	Electric Furnace
3	P2040003.JPG	2/4/2025 - 11:08 AM	Charge box preparing for charging of electric furnace
4	P2040004.JPG	2/4/2025 - 11:09 AM	Charging electric furnace
5	P2040005.JPG	2/4/2025 - 11:10 AM	Hood lifting in charging operation
6	P2040006.JPG	2/4/2025 - 11:10 AM	Charging of electric furnace
7	P2040007.JPG	2/4/2025 - 11:11 AM	Flame during charging of the electric furnace
8	P2040008.JPG	2/4/2025 - 11:19 AM	Differential pressure of baghouse #4
9	P2040009.JPG	2/4/2025 - 11:36 AM	Gas furnace pouring from rotary furnace #2
10	P2040010.JPG	2/4/2025 - 11:39 AM	Rotary gas furnace #2
11	P2040011.JPG	2/4/2025 - 11:39 AM	Rotary gas furnace #2
12	P2040012.JPG	2/4/2025 - 11:39 AM	Rotary gas furnace #1