



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, ILLINOIS 60604**

DATE: MAY 02 2019

SUBJECT: CLEAN AIR ACT INSPECTION REPORT
United Alloy, Inc., Janesville, Wisconsin

FROM: David Sutlin, Environmental Engineer
AECAB (MN/OH)

THRU: Dakota Prentice, Acting Section Chief
AECAB (MN/OH)

TO: File

BASIC INFORMATION

Facility Name: United Alloy, Inc.

Facility Location: 4100 Kennedy Rd., Janesville, Wisconsin

Date of Inspection: March 5, 2019

EPA Inspector(s):

1. David Sutlin, Environmental Engineer
2. Cody Yarbrough, Environmental Engineer

Other Attendees

1. Tom Baer, Chairman, United Alloy
2. Rick Sullivan, Facilities & Production Quality Manager, United Alloy
3. Vanessa Dubick, CFO, United Alloy
4. Duffy Dillon, Internal Counsel (by phone)
5. Ted Flynn, EHS Manager, United Alloy (by phone)

Contact Email Address: rsullivan@unitedalloy.com (copy tombaer@aol.com)

Purpose of Inspection: To determine compliance with applicable federal regulations

Facility Type: metal fabrication and finishing

Regulations Central to Inspection: 40 CFR Part 63, Subpart XXXXXX - National Emission Standards for Hazardous Air Pollutants: Area Source Standards for Nine Metal Fabrication and Finishing Source Categories

Arrival Time: 1:10 PM

Departure Time: 3:30 PM

Inspection Type:

- ☒ Unannounced Inspection
- ☐ Announced Inspection

OPENING CONFERENCE

- ☒ Credentials Presented
- ☒ CBI warning to facility provided

The following information was obtained verbally from United Alloy personnel unless otherwise noted.

Process Description:

Sheets of mild steel are fabricated to form metal enclosures including fuel tanks, trailers and housings for generators. The enclosures are then processed through finishing operations, mainly powder coating, to produce the final products. Fabrication operations at the facility include five laser cutting stations, a plasma cutter, press brake forming equipment, manual and robotic welding. Finishing operations include minimal dry grinding and four powder coating lines. Powder coating occurs in filtered booths. The laser cutters and an enclosed automatic welding unit are controlled by dust collectors. Primarily copper-coated steel wire is used in the welding operations.

TOUR INFORMATION

EPA toured the facility: Yes

Data Collected and Observations:

EPA observed an acid wash operation, which uses a solution containing phosphoric acid to clean the metal parts prior to powder coating. Both inspectors experienced a strong odor and temporary breathing discomfort while standing in front of the wash area.

Photos and/or Videos: were not taken during the inspection.

Field Measurements: were not taken during this inspection.

CLOSING CONFERENCE

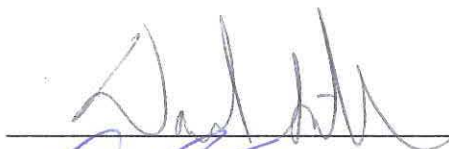
Requested documents:

- SDS for powder paint and acid wash

Compliance Assistance: EPA explained that the facility may be subject to the Area Source NESHAP for Nine Metal Fabrication and Finishing Source Categories, at 40 CFR Part 63, Subpart XXXXXX.

SIGNATURES

Report Author:



Date:

5/1/19

Section Chief:



Date:

5/2/19