



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
Four Penn Center – 1600 John F Kennedy Blvd
Philadelphia, Pennsylvania 19103-2852

Report Title: Clean Air Act Inspection of Robert C Jones Alloy
Inspection Date(s): June 27, 2023
Regulatory Program(s): NSPS, NESHAP, MACT

Company Name: Robert C Jones Alloy
Facility Name: Robert C Jones Alloy
Facility Location: 515 W 8th Avenue, Suite 101
Huntington, WV 25705

Latitude: 38.411 **Longitude:** -82.461
County/Parish: Cabell County

AFS/ICIS-Air Number: N/A
Permit Number: N/A
NAICS Code: N/A **SIC:** N/A
Unique Project #: 3E23CA075A

Facility Representatives:

Point of Contact

Robert C Jones, Owner



Phone: (304) 697-3221 Email: N/A

Andrea Bourdelais, Owner of Level 1 Fasteners, Inc



Phone: (304) 697-2323 Email: N/A

EPA Inspectors:

Kim Laufenberg, Air Inspector & Compliance Officer, 3ED21

Phone: (215) 814-2265 Email: Laufenberg.Kim@epa.gov

Scott Yanos, Air Inspector & Compliance Officer, 3ED21

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State/Local Inspectors:

Joshua Woody, Compliance & Enforcement Officer, WVDEP

Phone: (304) 400-9974 Email: Joshua.M.Woody@wv.gov

EPA Lead Inspector

Signature

Kim Laufenberg

Date

1600 John F Kennedy Blvd
Philadelphia, PA 19103-2852

Supervisor

Signature

Kristen Hall

Date

Table of Contents

I. Introduction.....	3
A. Summary of the Facility	3
B. Inspection Opening Conference.....	4
II. Site Activity/Process Description.....	4
III. Observations.....	4
IV. Records Review	5
V. Closing Conference	5
VI. List of Attachments.....	5

I. Introduction

The United States Environmental Protection Agency (EPA) tried to conduct a Clean Air Act (CAA) inspection at Robert C Jones Alloy (RCJ Alloy or Facility) to verify compliance with applicable State and Federal regulations. The West Virginia Department of Environmental Protection (WVDEP) was notified of the inspection on June 12, 2023, via email. On June 23 & 26, 2023, EPA inspector, Kim Laufenberg, tried to notify the Facility several times of the planned inspection via phone, yet the voicemail inbox was indicated as full, and no message could be left. Nor did any representative answer any of EPA's calls.

The inspection was intended to be an evaluation of the Facility's processes and its compliance with the CAA. All information included in this report is the result of observations by EPA inspectors while on-site, materials gathered by the inspectors, and/or statements by employees of neighboring companies to the Facility. In addition, information gathered prior to the inspection from a review of EPA and State records may be included in Section A below.

A. Summary of the Facility

The Facility is located at 515 W 8th Avenue, Suite 101, Huntington, WV 25705. RCJ Alloy is noted online to be a nickel processing plant. No company website could be found; instead, the Facility's Facebook (<https://www.facebook.com/profile.php?id=100070351178601>) and Dunn & Bradstreet were reviewed for additional background.

The Facility does not have any Clean Air Act (CAA) Federal or State permits. The Facility is/was subject to, or potentially subject to the following federal regulations:

- 40 C.F.R. Part 60, Subpart Dc – Standards of Performance for Small Industrial, Commercial, and Institutional Steam Generating Units
- 40 C.F.R. Part 63, Subpart N – National Emissions Standards for Chromium Emissions from Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks
- 40 C.F.R. Part 63, Subpart T – National Emission Standards for Halogenated Solvent Cleaning
- 40 C.F.R. Part 63, Subpart CCC – National Emission Standards for Hazardous Air Pollutants for Steel Pickling: HCl Facilities and Hydrochloric Acid Regeneration Plants
- 40 C.F.R. Part 63, Subpart DDDDD – National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers
- 40 C.F.R. Part 63, Subpart YYYYY – National Emission Standards for Hazardous Air Pollutants for Area Sources: Electric Arc Furnace Steelmaking Facilities
- 40 C.F.R. Part 63, Subpart JJJJJ – National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources
- 40 C.F.R. Part 63, Subpart WWWW – National Emission Standards for Hazardous Air Pollutants: Area Source Standards for Plating and Polishing Operations
- 40 C.F.R. Part 63, Subpart ZZZZZ – National Emission Standards for Hazardous Air Pollutants: Area Source Standards for Aluminum, Copper, and other Nonferrous Foundries

B. Inspection Opening Conference

At 8:22AM on June 27, 2023, EPA inspectors arrived at the Facility for a CAA Inspection. Also present was Joshua Woody from WVDEP. EPA inspectors, Kim Laufenberg and Scott Yanos, discussed RCJ Alloy background with the WVDEP inspector and proceeded to attempt to make contact with any Facility representative on-site to present their credentials and explain the purpose of the visit was to conduct a CAA inspection to determine compliance with their permit and any applicable regulations. No such contact was made.

II. Site Activity/Process Description

As no Facility representative was present, nor could an opening conference be conducted, no further process descriptions could be gathered. Instead, inspectors gathered visual observations of the site during the walkthrough, which is discussed in Section III of this report, and associated company neighbors were talked to for further background.

III. Observations

EPA inspectors began their walkthrough of the site surrounding the Facility at approximately 8:30AM and Joshua Woody of WVDEP was also present for the walkthrough, joining at 9:00AM. EPA inspectors took photos during the site walkthrough (Attachment 1).

Initially, EPA inspectors tried to make contact with the Facility by knocking on what appeared to be the front door (off of 8th Avenue). Visually, the door appeared to be welded shut and nothing could be heard from inside. Overgrown plants covered most of the right side of the building, some of the front loading dock, and one sign which noted the name of the Facility (Robert C Jones Alloy Metal Processing) along with the address (515 W. 8th Ave.)

Inspectors continued to walk around the site (down W 5th St, to W 9th Ave), passing around Magnetech Industrial Services, Inc., to get to the side and back of RCJ Alloy. One barrel of potential waste (as noted by a label) was noticed near the side entrance. WVDEP and EPA inspectors then talked to two Magnetech employees, who were observed behind the neighboring business. Inspectors asked if they had recently seen any people or trucks in and out of the Facility. They replied they had not; no activity had been seen for years.

Continuing to walk around the site, inspectors came to the back of the Facility. Again, the building appeared to be abandoned. All the doors were locked, nothing could be heard from inside, and when glancing through a glass door, rubble, and debris were observed on the floor.

At that point in time, a Valicor Oil employee (the other neighboring business) asked if the inspectors wanted entry to the building. EPA inspector, Kim Laufenberg, conveyed she wanted to talk to a Facility representative from RCJ Alloy or the owner of the building. The employee stated that RCJ Alloy left years ago. He also stated Level 1 Fasteners, Inc owned the entire complex (including Valicor Oil) and was located on the other side of Valicor Oil.

The inspectors then continued/walked to Level 1 Fasteners, Inc. Andrea Bourdelais, the owner of Level 1 Fasteners, Inc spoke with EPA and WVDEP about the recent history of RCJ Alloy. She said the Facility had stopped paying rent about 3 years ago and thus were evicted. Andrea confirmed the site was now abandoned, with the only activity being installation of monitoring devices in the building's wells. After talking to Ms. Bourdelais, EPA inspector, Kim Laufenberg, notified her manager via voicemail, Kristen Hall, of the site being abandoned. WVDEP inspector called a contact at the City of Huntington to check if perhaps the company had moved to another location. No additional interview information, photographs, or documentation was gathered after this point. The walkthrough concluded at 10:15AM.

IV. Records Review

A request for records was intended to be conveyed, but as no contact could be made with the Facility or its representatives, records noted in Attachment B could not be requested. EPA inspectors plan to continue to evaluate business records if the company moved and if so, send the attached records' request to continue the CAA inspection.

V. Closing Conference

EPA notes that the investigation is on-going, and any areas of concern identified in this report do not necessarily reflect a violation or deviation, rather, they are areas that will require further investigation. EPA notified WVDEP that an inspection report would be issued within 60 days. Simultaneously, EPA will continue to evaluate the Facility's potential operations at another location and may have additional questions. The inspection concluded at 10:15AM.

The following have been identified as *potential* issues during the inspection. They are issues that require either further investigation by EPA or additional information or explanation by RCJ Alloy.

- *Operation at a new location, and*
- *Air Permit and Clean Air Act regulation(s) applicability.*

VI. List of Attachments

Attachment A: Photo Log for Robert C Jones Alloy Inspection

Attachment B: Intended Records Request

ATTACHMENT A: PHOTO LOG

Facility: Robert C Jones Alloy

Location: 515 W 8th Avenue, Suite 101, Huntington, WV 25701

Inspection Date: 6/27/2023

EPA Inspector(s): Kim Laufenberg

Photographer: Scott Yanos



Photo Number: DSC00479

Photo Description: Back View of Facility



Photo Number: DSC00480

Photo Description: View of Back Door of Facility



Photo Number: DSC00481

Photo Description: Noted Debris and Indication of Eviction Inside Back Door of Facility



Photo Number: DSC00482

Photo Description: Overgrown Vegetation on Front Right Side of Facility



Photo Number: DSC00483

Photo Description: Front View of Facility



Photo Number: DSC00484

Photo Description: Facility Sign and Noted Overgrown Vegetation



Photo Number: DSC00485

Photo Description: Front Door, Welded Shut

ROBERT C JONES ALLOY (FACILITY)

EPA CAA Inspection Records Request

June 27, 2023

Please provide electronic copies of the following records, unless otherwise specified:

1. Provide a plot plan of the Facility. Also, provide a paper copy during the opening conference.
2. Provide a detailed description of the Huntington Plating's process(es).
3. A list of all combustion sources at the Facility such as furnaces, boilers, and/or engines.
 - a. For each boiler or engine identified, provide:
 - i. Date of installation;
 - ii. Type of fuel(s) combusted;
 - iii. Maximum heat input rating (MMbtu or kW/hr);
 - iv. Hours of operation monthly from January 2020 to the present.
 - b. Fuel usage on a monthly basis for any combustion equipment at the Facility (boilers, emergency generators, fire pumps, etc.) since January 2020.
 - c. Records of each tune-up conducted at each unit since January 2020.
4. For each of Huntington Plating's tanks, provide:
 - a. Whether the tank is existing or new (include date of installation);
 - b. The rectifier capacity (volume – gallons);
 - c. Material stored (content held within the tank);
 - d. Annual tank turnover since January 2020;
 - e. The control device(s) used;
 - f. Copies of monitoring records since January 2020;
 - g. A copy of the operation and maintenance plan required by 40 C.F.R. § 63.342(f)(3).
5. Provide copies of the emission statements submitted to WVDEP for the years 2020-2022. These emission statements shall include the emission factors used to determine emissions and the derivation of each factor (stack test, CEMS, AP-42, etc.).
6. Annual production and emissions calculations (preferably emailed in an unlocked Microsoft Excel format) since 2020, including but not limited to:
 - a. Records on the amount of any electroplating, machining, welding, plating, boring, grinding, honing, milling, polishing, and turning on an annual basis;
 - b. Monthly emissions of VOCs, HAPs and NOx for each process unit and facility wide along with supporting calculations for 2020-2022 (lbs/hr).
7. Provide a list of each control device currently in use at the Huntington Plating used to control or reduce emissions from any emission point at the site. The list should include:
 - a. The make/model of the control;
 - b. Date of installation at the Facility;
 - c. Which pollutant(s) are being controlled;
 - d. Each source or emission point being controlled;
 - e. The reduction efficiency (%) for each control;
 - f. Copies of any stack tests conducted to determine emissions, control efficiency, for compliance demonstrations, etc. conducted at the Facility since 2000.
8. Provide a list of each request for permit determination or permit application submitted to the WVDEP since January 2020. Also, provide a list of each permit or permitting determination issued to Huntington Plating. This should include the date of the request/permit and the permit number, if applicable.
9. Provide copies of any initial notifications, compliance reports, and/or periodic reports submitted to either EPA or WVDEP for 40 C.F.R. Parts 60 and 63.