



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

DATE: APR 16 2019

SUBJECT: CLEAN AIR ACT INSPECTION REPORT
Whiting Metals, LLC, Hammond, Indiana

FROM: Dakota Prentice, Environmental Engineer
AECAB (IL/IN)

THRU: Nathan Frank, Section Chief
AECAB (IL/IN)

TO: File

BASIC INFORMATION

Facility Name: Whiting Metals, LLC

Facility Location: 2230 Indianapolis Boulevard, Hammond, Indiana, 46394

Date of Inspection: December 20, 2018

EPA Inspector(s):

1. Dakota Prentice, Environmental Engineer
2. Sarah Clark, Environmental Engineer
3. Andrew Maguire, On-Scene Coordinator

Other Attendees

1. Kevin T. Davis, Senior Environmental Manager, Indiana Department of Environmental Management (IDEM)
2. Lisa Brown, Environmental Manager II, IDEM
3. Jeff Condon, Managing Partner (Owner), Whiting Metals LLC
4. Bob Griffin, Plant Manager, Whiting Metals LLC

Contact Email Address: Alex Gross - agross@whitingmetals.com

Purpose of Inspection: baghouse dust sample collection

Facility Type: Nonferrous metals recycler

Arrival Time: 10:45 AM

Departure Time: 11:20 AM

Inspection Type:

- ☐ Unannounced Inspection
☒ Announced Inspection

OPENING CONFERENCE

Given that EPA provided notice of this inspection, Jeff Condon was waiting for EPA personnel upon arrival at the facility. Mr. Condon offered EPA a bag of baghouse dust; however, EPA insisted that samples needed to be collected by EPA personnel at the baghouses. Mr. Condon also briefly discussed a recent violation letter he had received from IDEM related to alleged RCRA violations. EPA personnel informed Mr. Condon that EPA could not speak to the contents or assertions made in the IDEM letter.

BAGHOUSE SAMPLE COLLECTION

Bob Griffith led EPA and IDEM personnel from the facility's offices to its baghouses. At the time of our inspection, four of the five Detinning units were operational, and the emission units K-6, K-14, and F-3 were all operational and processing lead.

EPA collected the following samples:

Sample 1

Location: Portable Baghouse No. 1

EPA Sample ID: EPA PB-1

IDEM Sample ID: 12/20/18-001

Notes: Sample collected from one of two drums present at Portable Baghouse No. 1 (see Photo Log)

Sample 2

Location: Portable Baghouse No. 2

EPA Sample ID: EPA PB-2

IDEM Sample ID: 12/20/18-002

Notes: Sample collected from one of two drums present at Portable Baghouse No. 2 (see Photo Log)

Sample 3

Location: Main Baghouse (i.e., American Air Bag Filter Dust Collector System)

EPA Sample ID: EPA MB

IDEM Sample ID: 12/20/18-003

Notes: Sample collected from one of two drums present at Main Baghouse (see Photo Log)

EPA collected baghouse dust samples consistent with the Baghouse Dust Sampling Investigation Quality Assurance Project Plan (QAPP), except for the following deviations:

- Sampling was not conducted at Portable Baghouse No. 3 because its drums were empty of baghouse dust, so there was no dust available for sampling. Whiting Metals personnel described the unit as not currently operational.
- Sampling was conducted at the Main Baghouse while the unit was in operation under the supervision of Whiting Metals personnel.
- EPA collected grab samples rather than composite samples.
- EPA collected two grab samples per baghouse, providing one sample to IDEM.

The samples were placed in a cooler with ice and hand-delivered to EPA's Chicago Regional Laboratory for total metals analysis as documented in the QAPP.

Baghouse dust sample analytical results are included as an attachment to this report.

CLOSING CONFERENCE

Upon completion of sampling activity, EPA thanked Whiting Metals personnel and exited the Whiting Metals property.

BAGHOUSE DUST ANALYTICAL RESULTS

EPA's Chicago Regional Laboratory provided final analytical test results on March 19, 2019. This analysis has confirmed the presence of lead and cadmium in the baghouse dust sample collected from the Main Baghouse. Results from samples collected at Portable Baghouse No. 1 and Portable Baghouse No. 2 confirmed the presence of lead; however, cadmium was not detected. Final analytical reports can be found in the attachments section of this report.

SIGNATURES

Report Author:  Date: 4/12/19

Section Chief:  Date: 4/19/19

Facility Name: Whiting Metals, LLC

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APPENDICES AND ATTACHMENTS

- Photo Log
- Photo Archive CD-R
- Copy of Chain of Custody Record
- Chicago Regional Laboratory Analytical Report

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APPENDIX A: DIGITAL IMAGE LOG

1. Inspector Name: S. Clark	2. Date(s) of Inspection: December 20, 2018
3. Company/Facility Name: Whiting Metals, LLC	4. Street Address, City, State: 2230 Indianapolis Boulevard, Hammond, Indiana
5. Number of Images: 18	6. Archival Record Location: CD-R Labeled "Whiting Metals Baghouse Sampling Dec. 20, 2018 Photos"

Image Number	File Name	Date and Time (Central Standard Time)	Latitude and Longitude	Description of Image
1	PC200001.JPG	12/20/2018 10:53	41.673889, -87.492778	Portable Baghouse No. 1
2	PC200002.JPG	12/20/2018 10:54	41.673889, -87.492778	Detinning Operations
3	PC200003.JPG	12/20/2018 10:58	41.67351, -87.495098	Sample Jars for Portable Baghouse No. 1
4	PC200004.JPG	12/20/2018 10:59	41.673483, -87.495087	Sample Jars for Portable Baghouse No. 1
5	PC200005.JPG	12/20/2018 11:00	41.673458, -87.495097	Portable Baghouse No. 1
6	PC200006.JPG	12/20/2018 11:01	41.673433, -87.495067	Duct at Exterior Wall of Room Housing Detinning Operations
7	PC200007.JPG	12/20/2018 11:03	41.67332, -87.495033	Sample Jars for Portable Baghouse No. 2
8	PC200008.JPG	12/20/2018 11:04	41.673398, -87.494937	Portable Baghouse No. 2
9	PC200009.JPG	12/20/2018 11:06	41.673562, -87.495733	Portable Baghouse No. 3
10	PC200010.JPG	12/20/2018 11:06	41.673555, -87.495812	Portable Baghouse No. 3
11	PC200011.JPG	12/20/2018 11:06	41.673573, -87.495913	Emission Unit K-6
12	PC200012.JPG	12/20/2018 11:10	41.67347, -87.496107	Sample Jars for Main Baghouse
13	PC200013.JPG	12/20/2018 11:11	41.673567, -87.4964	Drums Collecting Baghouse Dust at Main Baghouse
14	PC200014.JPG	12/20/2018 11:11	41.673567, -87.49655	Main Baghouse

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15	PC200015.JPG	12/20/2018 11:11	41.673567, -87.49655	Main Baghouse Ductwork
16	PC200016.JPG	12/20/2018 11:12	41.673733, -87.496082	Emission Units K-13 (left) and K-14 (right)
17	PC200017.JPG	12/20/2018 11:13	41.673685, -87.496027	Emission Unit F-3
18	PC200018.JPG	12/20/2018 11:18	41.673611, -87.495833	East Exterior of Whiting Metals Facility