REGION 5
CHICAGO, IL 60604

MEMORANDUM

SUBJECT: CLEAN AIR ACT INSPECTION REPORT
Keystone Automotive Industries, Inc., dba Transmetco

FROM: Linda H. Rosen, Environmental Engineer
AECAB (IL/IN)

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

TO: File

BASIC INFORMATION

Facility Name: Keystone Automotive Industries, Inc., dba Transmetco (Transmetco)

Facility Location: 1750 East Riverfork Drive, Huntington, Indiana

Date of Inspection: 10/30/2023

EPA Inspector(s):
1. Linda H. Rosen, Environmental Engineer
2. Liam Klaiman, Environmental Engineer

Other Attendees:
1. Angela Verseman, Air Compliance Inspector, Indiana Department of Environmental Management
2. Tony Okuly, Maintenance Manager, Transmetco

Contact Email Address: Tokuly@LKQcorp.com

Purpose of Inspection: Clean Air Act inspection of secondary aluminum production facility

Facility Type: Secondary aluminum production facility

Regulations Central to Inspection: National Emission Standards for Hazardous Air Pollutants for Secondary Aluminum Production, 40 C.F.R. Part 63, Subpart RRR (Secondary Aluminum Production NESHAP or NESHAP).

Arrival Time: 3:15 p.m.
Departure Time: 5:00 p.m.

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

The following information was obtained verbally from Tony Okuly unless otherwise noted.

Process Description:
The facility produces 356 aluminum ingots or sows which are sold to brokers and to the automotive industry. The facility started up in 2004-2005. The facility purchases scrap wheels from scrap yards. There are no contracts, only purchase orders. About 98 percent of the wheels are whole and 2 percent are incidentally crushed. There is no crusher at the facility. No formal inspections are conducted on the scrap, but the materials are segregated by type. Chrome plated materials and semi-truck wheels are sent back or sold as those alloys are not used in the products. Prior to melting the scrap, the wheels are "cleaned" with hand tools that remove the wheel weights and valve stems.

Operators place the scrap material onto a conveyor belt that feeds the materials into the furnace, identified as Sweat Furnace (SF)-1. The materials are added to the "stack" which is that part of the furnace where melting occurs. The facility occasionally adds alloying agents to the melt, including but not limited to strontium, silicon and titanium. The furnace operates at 1600-1700 degrees Fahrenheit. As the metal melts, the melt moves through an opening into a connected holding chamber. Once the holding chamber fills up, the furnace is opened and the metal moves through a trough and into an argon degasser which filters the impurities out. The metal is then poured into molds. The facility considers the process to be continuous. The furnace is controlled by a baghouse (not lime-injected) that is equipped with a bag leak detection system (BLDS) and exhausts through Stack S-2.

Staff Interview: LKQ owns the facility. The facility employs 42. Production operates 24/7 and the office is open 7 a.m. to 3 p.m. Chris Reynolds is the General Manager who would normally be involved in an inspection, but he was not present today. Production was about 162,000 pounds per day on average this month.

Tony Okuly stated that the facility does not add fluxing agents to the bath melt. However, a wall flux is used to clean the inside of the furnace Mondays, Wednesdays and Fridays when the furnace is empty.

The facility scrapes the side walls with a steel rake, and they do this right after the melt is done when the furnace is still warm. The baghouse is operating when the scraping is done.

The baghouse has 192 bags. The facility coats the filters/bags with carbon. This is done each time the bags are changed. All the bags were changed at the end of 2022.

Tony Okuly did not know whether the facility was a major or area source of hazardous air pollutants (HAPs). He said he was not too familiar with the NESHAP.

We discussed the bypass to the atmosphere that is on the duct from the top of the furnace to the baghouse. Tony Okuly said that there is a damper on the duct which can be manually or automatically opened and closed. The damper opens the bypass to the atmosphere through Stack S-1 when the furnace is not melting, such as during furnace maintenance work, furnace relining, malfunctions, or other types of shutdowns. The bypass stack might also be used if they are just holding metal. Tony did not know if the facility tracks when the damper and bypass are open. There is a visual alarm that activates if the damper is open.

Regarding the capture and collection of emissions at the furnace, Tony Okuly did not know whether the facility had done annual flow measurements. He said that the facility may have done an initial capture assessment, but he was not sure. The facility does have an Operation, Maintenance and Monitoring (OM&M) plan. The facility relies on the corporate environmental group for assistance with compliance. There was a stack test in 2023 but Tony did not know the details.

For the baghouse inlet temperatures (BIT), the facility tracks the continuous values. Tony Okuly did not believe they were calculating a 3-hour average BIT. He did not know the temperature setpoint value offhand. There are audible and visual alarms set up for the BIT: a high temperature alarm and a high-high temperature alarm. The facility also measures the exhaust temperature.

TOUR INFORMATION

EPA Tour of the Facility: Yes

Data Collected and Observations:
We observed the scrap wheels (Photo 1). We observed cladding being taken off to be discarded. We saw the conveyor where workers place the scrap and “clean” it for melting. There was general ventilation in this area. We observed the conveyor bringing the scrap to the top of the “stack” where it was dumped into the reverberatory furnace (Photo 2). We observed the furnace and ductwork from several angles (Photos 3-6, 12, and 13). There appeared to be three hoods on the furnace: (1) charge well; (2) top of the furnace; and (3) furnace door. (Photos 8-11). Tony Okuly said the furnace hood covered the holding chamber. EPA inspectors noted and told Tony Okuly that the facility did not have any furnace labels posted.

We observed the facility operator opening the furnace door to add alloys to the furnace (Photo 7). About 10 minutes later, an operator again opened the door to skim out the furnace dross. Tony Okuly said that the operator skims out the dross for 2-5 minutes about every hour. The dross is then taken to another area and cooled. We also observed another operator opening the door to the furnace to help the metal move through the opening to the holding part of the furnace.

We observed the duct from the top of the furnace which has a bypass to the atmosphere (Photos 14). We saw the molten metal moving through the trough and into the argon degasser.

We observed two baghouses outside (Photos 15-17). The one on the right in the photo is not in service but could be used. The current baghouse was installed due to the other one being too small.

We observed the building where the dross that is cleaned out of the furnace is cooled. One side was open. There was a window with a fan in it.

Photos and/or Videos: were taken during the inspection.
See Media Appendix A

Field Measurements: were not taken during this inspection.

RECORDS REVIEW

I obtained the following document from the facility, scanned it, and uploaded to EPA Region 5's Electronic Records Center: September 2018 OM&M plan.

CLOSING CONFERENCE

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

Requested documents:
I told Tony Okuly that we may request documents informally through an email or formally through a Request for Information.

Concerns:

We mentioned the following concerns to Tony Okuly;

- The facility did not have furnace labels posted. The Secondary Aluminum Production NESHAP requires that the facility place visible labels specifying specific information at each Group 1 furnace.
- The facility may not be calculating the 3-hour average BIT as required by the Secondary Aluminum Production NESHAP.

DIGITAL SIGNATURES

Report Author: Linda H. Rosen

Section Supervisor: NATHAN FRANK Digitally signed by NATHAN FRANK Date: 2023.12.20 09:33:40 -06'00'

APPENDICES AND ATTACHMENTS

1. Confidential Business Information Attachment
2. Appendix A: Digital Image Log

CONFIDENTIAL BUSINESS INFORMATION ATTACHMENT

Facility Name: Transmetco
Facility Location: 1750 East Riverfork Drive, Huntington, Indiana
Date of Inspection: October 30, 2023

Transmetco claimed the photos taken during the inspection as Confidential business Information (CBI). The facility did not claim the descriptions of the photos to be CBI.

APPENDIX A: DIGITAL IMAGE LOG

1. Inspector Name: Liam Klaiman	**2. Archival Record Location:** Region 5 Electronic Records Center-CBI folder

Image Number	File Name	Date and Time	Description of Image
1	IMG_0442.JPG	2023:10:30 16:02:58	Wheel scrap
2	IMG_0443.JPG	2023:10:30 16:06:44	Wheels moving up conveyor to "stack"
3	IMG_0444.JPG	2023:10:30 16:11:46	Furnace
4	IMG_0445.JPG	2023:10:30 16:11:57	Furnace
5	IMG_0446.JPG	2023:10:30 16:15:29	Furnace, hood over door
6	IMG_0447.JPG	2023:10:30 16:17:02	Furnace
7	IMG_0448.JPG	2023:10:30 16:18:28	Furnace door open
8	IMG_0449.JPG	2023:10:30 16:19:48	Furnace ductwork. Shows 3 areas of collection. Shows bypass
9	IMG_0450.JPG	2023:10:30 16:19:49	Furnace ductwork. Shows 3 areas of collection. Shows bypass
10	IMG_0451.JPG	2023:10:30 16:19:50	Furnace ductwork. Shows 3 areas of collection. Shows bypass
11	IMG_0452.JPG	2023:10:30 16:19:55	Furnace ductwork. Shows 3 areas of collection. Shows bypass
12	IMG_0453.JPG	2023:10:30 16:21:02	Furnace another angle
13	IMG_0454.JPG	2023:10:30 16:25:18	Ductwork from charge well and top of furnace
14	IMG_0455.JPG	2023:10:30 16:32:39	Closeup of bypass stack
15	IMG_0456.JPG	2023:10:30 16:35:03	Baghouse
16	IMG_0457.JPG	2023:10:30 16:35:03	Baghouse
17	IMG_0458.JPG	2023:10:30 16:35:04	Baghouse