



REGION 3

PHILADELPHIA, PA 19103

Report Title: Clean Air Act Inspection of Tech Met Glassport
Inspection Date(s): 03/12/2024
Regulatory Program(s): NSPS, NESHAP, MACT, SIP

Company Name: Tech Met Inc
Facility Name: Tech Met Glassport
Facility Location: 15 Allegheny Square
Glassport, PA 15045

Latitude: 40.32062 **Longitude:** -79.89238
County/Parish: Allegheny County

AFS/ICIS-Air Number: PAACH0004200300975
Permit Number: 0269-I002a, 0269-I003
NAICS Code: 332812 **SIC:** 3479
DSB ID #: ECAD-60

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Signature

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I. Introduction

The United States Environmental Protection Agency (EPA) conducted a Clean Air Act (CAA) inspection at Tech Met, Inc. (Tech Met or Facility) to verify compliance with applicable State and Federal regulations. The Allegheny County Health Department (ACHD) was notified of the inspection on February 26, 2024 via email. On March 8, 2024, EPA notified the Facility of the planned inspection via phone and email. EPA emailed a list of records for review to Mike Vidra, President of Tech Met, prior to the inspection (see Attachment 1). These records are listed in the Records Review section of the report.

The inspection included an evaluation of the Facility's processes and its compliance with the CAA. All information included in this report is the result of statements by the Facility representatives, materials shown to the inspectors by the Facility representatives, and/or documents provided by the Facility representatives to the inspectors at the time of, or subsequent to, the inspection. In addition, information gathered prior to the inspection from a review of EPA and State records may be included in Section A. Summary of the Facility.

A. Summary of the Facility

The Facility is located at 15 Allegheny Square, Glassport, PA 15045. Tech Met is a chemical milling company that uses acid to perform metal milling work instead of traditional machining techniques. This allows Tech Met to etch and cut the metal alloys. Tech Met mostly performs chemical milling services for the aerospace, medical, military, and other commercial entities that require precise milling according to their website: <https://www.techmetinc.com/>.

The Facility has received two Installation Permits (0269-I002a and 0269-I003) from ACHD. Permit 0269-I002a was issued on March 13, 2012, and amended May 13, 2022. Permit 0269-I003 was issued on October 1, 2013. Tech Met has submitted an operating permit application and several installation permit applications that are pending approval by ACHD.

Tech Met Glassport has not been determined to be a major or minor source. Emissions of potential concern include, but are not limited to, particulate matter (PM), sulfur dioxide (SO₂), volatile organic compounds (VOCs), nitrogen oxides (NO_x), carbon monoxide (CO) and hazardous air pollutants (HAPs). The Facility is subject to, or potentially subject to the following federal regulations:

- 40 CFR Part 63, Subpart HHHHHH – National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources
- 40 CFR Part 63, Subpart XXXXXX – National Emission Standards for Hazardous Air Pollutants Area Source Standards for Nine Metal Fabrication and Finishing Source Categories

B. Inspection Opening Conference

At 9:05 AM on March 12, 2024, EPA inspectors arrived at the Facility for a CAA Inspection and conducted a brief opening conference. Tech Met Inc. was represented by Mike Vidra, President of Tech Met; Paige Svetz, EHS Coordinator; Jonathan Yezioro, Maintenance Supervisor; Jordan Inurpi, Production Manager; Ed Palanko, Senior Process Engineer; and Robert Vaccaro, Tech Service Manager. Also, Allason Holt, Compliance Chief; Alanna Bachtlin, Inspector; Cali Conley, Admin II-AQ; and Nick Caito, Enforcement Engineer for ACHD were present. EPA inspectors, Scott Yanos and Paul Arnold, presented their credentials and explained the purpose of the visit was to conduct a CAA inspection to determine compliance with their permit and any applicable regulations. Additionally, EPA informed the facility representatives of their right to claim any confidential business information (CBI). At that time, Mike Vidra did not claim any photos or documentation as CBI.

II. Site Activity/Process Description

Tech Met is an employee owned, privately held company founded in 1985. Tech Met has been operating at the location in Glassport, PA since 2011. Since it began operation at the current location of Glassport, it has conducted chemical milling using acids to precisely mill fabricated components for the aerospace, medical, military, and commercial entities. In Glassport, Tech Met operates two separate buildings within the same complex, Building 15 which is the main building that houses the main process line, and Building 33 which has an additional automated process line. Building 15 operates Monday to Friday, 6:00 AM to 2:30 PM and Building 33 operates Monday to Thursday, 6:00 AM to 4:30 PM. At the time of EPA's inspection, to Mike Vidra, Tech Met was operating at 75% of their maximum capacity.

Chemical milling is a type of machining that uses strong acids in place of traditional mechanical machining in order to have a more precise and polished finish on the metal parts being worked on. According to Mike Vidra, traditional machining leaves behind marks and grooves on the metal part and these interfere with the operation of aerospace vehicles which need smooth surfaces on the metal parts in order to function correctly. The strong acid solutions are made up of a combination of Hydrochloric acid (HCl), Hydrofluoric acid (HF) and Nitric acid (HNO₃). These acids are used in varying concentrations and controlled amounts depending on the products and materials. The strength of the solution determines how quickly and deeply the metal part is etched. The strength and concentration of the acids is developed by the on-site lab to determine the best acid solution to perform the etching desired. Tech Met primarily works with two metal alloys, ferrous and titanium, which often contain nickel and chromium in various amounts depending on the contract materials being processed. The ferrous alloys are processed through the Ferrous Cell area and the titanium alloys are processed through the Titanium Cell area.

Depending on the contract, the metal parts may need to be prepared before going to the acid baths to be etched. One process used to prepare metal parts for either the coating or milling is abrasive blasting instead of mechanical milling. The abrasive blasting uses aluminum oxide. After a metal part has been

prepared by the abrasive blasting, the metal part is sent to be coated with a maskant that is acid resistant.

Tech Met uses a maskant called perchloroethylene (perc) which contains the chemical tetrachloroethylene. The maskant is also referred to as Adcoat 818. Perc is used to protect the areas that are not going to be etched with the chemical milling. Before the metal part goes to the acid baths to be etched, the metal part first is coated in perc through a dipping process. The metal parts are dipped several times in the perc to apply the coating to desired thickness. The parts are hung to dry between coats and after the final coat has been applied. Once the perc has fully dried, the metal parts are hand scribed, which removes the perc coating exposing the area that will be etched by the acid. All of the removed perc, both in the prepping and finishing processes, is recycled to be used again in the dipping process.

A second process that Tech Met uses at the Glassport location is a process where the acid roughens a surface instead of polishing it. This is primarily used in medical implants, but Tech Met has received contracts from various other industries that require a rough surface. This line is called the Hoist Automated Macro Roughening line (HAMR). This line is fully automated, employees load pieces onto racks which take the parts through the process. The HAMR line has an automated spray booth that is programmed to spray the certain areas to be roughed because although this maskant also contains tetrachloroethylene, it has a different make up that dissolves in the acid bath portion of the process and creates the rough surface that is desired. The acids used in this are HNO_3 and HF. Due the perc being dissolved, Tech Met is unable to recycle it in this process.

Tech Met also has a Manual Etch and Prime (MEP) process line but at the time of inspection this line was not being used and Mike Vidra stated that the line was being re-evaluated and it was unknown whether the line would resume production.

For the processes that require heating to perform the acid etching, Tech Met has seven process boilers. All six boilers are natural gas fired. The installation permit and Tech Met have referred to these boilers as Process Heaters #1-#6. The Ferrous Cell uses four of these boilers, Process Heaters #1, #2, #5 and #6 and the Titanium Cell has two, Process Heater #3 and #4. There is one boiler for the Manual Etch and Prime process line as well. Process Heaters #1 and #2 are both US Boiler Company boilers. Process Heater #1 has a max heat input rating of 0.285 MMbtu/hr and Process Heater #2 has a max heat input rating of 0.399 MMbtu/hr. The remaining four boilers are Lochinvar boilers. Process Heater #3 and #4 have a max heat input rating of 0.300 MMbtu/hr. Process Heater #5 and #6 have a max heat input rating of 0.215 MMbtu/hr. The MEP Boiler has a max heating input rating of 0.75 MMbtu/hr. None of the boilers have any emission controls.

HAP from the Titanium Cell and Ferrous Cell processes are controlled by a dual stage packed bed water scrubber. The Abrasive Blasting process uses a pulse jet baghouse to capture and control emissions from their blasting operations. The Maskant Room, where the parts are dipped in the perc, is kept

under negative pressure and emissions from this room are controlled using a granulated activated carbon bed.

Tech Met has one emergency generator which is Cummins GG1B-5702769 which uses natural gas as a fuel source and is rated as 225 BHP/ 150kW. The emergency generator has no emission controls to reduce emissions to the atmosphere.

The opening conference concluded at 10:03 AM.

III. Observations

EPA inspectors were led on a walkthrough of the Facility at 10:12 AM by Jonathan Yezioro and Ed Palanko of Tech Met. Allason Holt, Alanna Bachtlin, Cali Conley, and Nick Caito were also present for the walkthrough. EPA inspectors noted photos would be taken during the Facility walkthrough (Attachment 2).

The walkthrough started in Building 15. The first area observed during the walkthrough was the receiving area because it is where the parts are received and prepared to start the process of chemical milling. This area is also where the chemicals that Tech Met uses are received and behind this area is where all the chemical waste tanks are. There were four (4) chemical waste tanks in total. Three of the waste tanks have a capacity of 6,000 gallons while a fourth smaller tank has a capacity of 4,000 gallons. All the tanks are rated to receive all the acids that Tech Met uses in their chemical milling process which includes nitric acid, hydrochloric acid, hydrofluoric acid, and some sulfuric acid. This area has a containment wall lined with novolac epoxy which is acid resistant to contain spills. The two 6,000-gallon tanks that were observed on the back wall are actively being used to take waste acid from the titanium and ferrous cells. Vapors from these two tanks are routed to the dual packed bed scrubber for control. The other two tanks, a 6,000 gallon tank and 4,000 gallon tank closest to the Titanium Cell Scrubber, were recently installed and were not listed in the installation permits. These tanks are not connected to the production lines to receive waste acid and they were not connected to the Titanium Cell Scrubber either. Both of the newly installed tanks are not being used to take waste from the acid baths yet and were not being used at the time of this inspection. At current capacity, the two acid waste tanks that are being used need to be emptied every two and a half weeks. New acid is also received here before being placed in the acid storage area within the facility.

Located in this same area of Building 15's receiving area are three scrubbers that Tech Met uses for emissions control. Two of the scrubbers, the Titanium Cell scrubber and the Ferrous Cell scrubber, are located directly next to the acid waste storage. Both are dual stage packed bed scrubbers that use caustic soda as the primary treatment. The Ferrous Cell scrubber only handles emissions from the Ferrous Cell line of production while the Titanium Cell scrubber handles emissions from the Titanium Cell line of production and the acid waste storage tanks. A third scrubber, which is not listed in the installation permits is labeled as the Zinc scrubber and is located across from the Titanium Cell and Ferrous Cell scrubbers. This is a single stage scrubber. This scrubber is connected to a hydrochloric acid

bath and sodium hydroxide bath which is used to clean rollers that have accumulated material. This is a side process that Tech Met offers local industry.

The following data was collected at the time of the inspection for the three scrubbers:

	Inches of Water	Flow Rate (GPM)	pH
Titanium Cell Stage 1	1.0	320-350	9.24
Titanium Cell Stage 2	0.50	250-260	9.40
Ferrous Cell Stage 1	0.70	290-300	9.37
Ferrous Cell Stage 2	0.65	250-260	9.61
Zinc Scrubber	0.45	96.2	9.08

The roller cleaning line was observed next after the scrubbers. Tech Met provides a roller recovery service to local businesses who have steel rolling mills. These rollers get plated in metal alloys during use in the production of steel. Tech Met uses hydrochloric acid to dissolve the built-up plated material and clean the rollers. Since some of the metal alloys contain zinc, Tech Met uses the zinc scrubber to control the emissions from this process. After the hydrochloric bath, the rollers are put in a bath of sodium hydroxide to neutralize the acid. The EPA Inspectors observed the hydrochloric acid bath and sodium hydroxide bath with several rollers in front of them being prepared for cleaning. These baths were not being used during the time of the inspection due to work that was being performed in the area to change it over to a new production area.

After this, the EPA inspectors observed an emergency generator which is located outside next to the receiving area. The emergency generator was a Cummins 150 kW engine Model GG1B-5702769 which uses natural gas as a fuel source. The engine runtime meter displayed 136.8 hours at the time of inspection.

Next, the EPA Inspectors observed the Abrasive Blasting Room where the abrasive blasting preparation is performed before the metal parts go to the maskant room to have the Adcoat 818 coating applied. Aluminum oxide is used as the abrasive grit in the blasting process. The Econoline Abrasive Blaster is capable of blasting at a rate of 372 pounds per hour. The blaster exhaust was ducted to the baghouse. The baghouse was located outside of the building. At the time of the inspection, neither the abrasive blaster nor the baghouse was observed operating.

The EPA inspectors then observed the Maskant Room where the Adcoat 818 coating is applied to the metal parts by dipping them into a bath. Once dipped, the metal parts are hung to dry within the room. A part will be dipped multiple times to add thickness according to the needs of the contract and how much chemical milling is needed to be done to the metal part. The Maskant Room is kept under negative pressure and workers use a self-contained breathing apparatus to work within the room itself. The exhaust for the room is vented to a scrubber containing activated carbon for control. This control allows for the Adcoat 818 to be collected and recycled to be used again. A barrel is attached to the system in order to collect the Adcoat 818 that has been collected from the scrubber, it is then taken

back to the Maskant Room and placed back into the bath. The carbon within the scrubber is changed annually. The scrubber uses an electric boiler and Tech Met monitors the pressure and temperature for the scrubber.

Below where the Maskant Room scrubber is located is the Scribing Room. This is where Tech Met removes the maskant from the metal part that will be etched. Most of the metal parts are hand scribed with various hand tools but some of the parts require more work and scoring using mechanical tools like a Dremel. This process is highly variable depending on the metal part and the needs of the contract for that metal part.

Across from the Scribing Room is the Chemical Laboratory and the Acid Dispensing Area where the acids that are used for production are stored. The Chemical Laboratory tests the acid solutions in the acid baths to ensure the acid baths have the correct chemical make-up for the desired chemical milling. This is also the area where they will develop the acid solution they will use for a particular production line. The Acid Dispensing Area has two totes and one drum that store the acids to be dispensed to production areas, there is a 280 gallon tote that stores new hydrochloric acid, a 350 gallon tote that stores Nitric acid and a 55 gallon drum that stores Hydrofluoric acid. Employees take carboy containers that they fill up with the acid needed and convey it to the intended acid bath container. Emissions from the Chemical Laboratory and Acid Dispensing Area are controlled by a scrubber which Tech Met refers to as the Lab Exhaust Scrubber which is not in the installation permits. The Lab Exhaust Scrubber is a single stage Harrington fume scrubber and the following data was recorded for this scrubber at the time of the inspection: 0.75 inches of water, 70 GPM and 8.51 pH. Surrounding this scrubber were several barrels of citric acid which Tech Met uses to clean the scrubber.

From this area, the EPA Inspectors were next shown the Titanium Cell Production Area where the titanium process units are kept. Six large chem-mill tanks are reserved for regular use with the amount and size varying on contract. Parts are dipped into these tanks that usually have a solution of nitric acid and hydrofluoric acid to perform the chemical etching on the metal parts. Along with the tanks, eight spray boxes are in this area and are closed off so parts can be sprayed and etched with hydrofluoric acid instead of dipped in tanks. All eight spray boxes have intakes affixed directly to the box which leads to the titanium cell scrubber. The Titanium Cell Production has two Lochinvar EBN300 natural gas boilers which are used when a contract requires the acid solution to be heated. The are both rated as 0.300 MMbtu/hr. A heat exchanger is used to heat the acid solution.

Next to the Titanium Cell Production Area is the Ferrous Cell Production Area. There are a total of 15 production tanks within the room, a rinse tank filled with water, and two etch tanks filled with acid solutions. The Ferrous Cell production line uses mostly nitric acid, hydrochloric acid, and sulfuric acid in their solutions for etching. All the production units in this area perform chemical etching by dipping the metal parts into the acid solution filled tanks. All of the production units have intake ventilation that is connected to the ferrous cell scrubber. The ferrous cell production area has four boilers used in their production process. Two by US Boiler Company, Models APL-285B which is rated at 0.285 MMbtu/hr

and ASPN-399 which is rated at 0.399 MMbtu/hr. The other two natural gas boilers are Lochinvar Model CBN215 rated at 0.215 MMbtu/hr. A heat exchanger is used to heat the acid solution.

This concluded the walkthrough in Building 15 and the EPA inspection team proceeded to Building 33. Walking into Building 33, the Boiler used for the process heat in the building was observed. It is a Lochinvar Model PBN0752 rated 0.75 MMbtu/hr. Next the EPA inspectors were shown the HAMR Line Packed Bed Scrubber which is the emissions control for the HAMR Production Line. It is a single stage scrubber using caustic soda for treatment. The data collected for the scrubber at the time of the inspection is as follows: 1.1 inches of water, 133.6 GPM and 8.63 pH.

After observing the HAMR scrubber, the EPA Inspectors were shown the HAMR Production Line. The perc coating used in the HAMR line is applied using an automated spray booth. Tech Met programs what areas need the maskant and then an automated spraying arm applies the perc using an aerosol gun. The spray booth itself is fully self-contained room with a lower pressure which assists in the ventilation of the space. There is a vent within the booth with filters that are checked periodically while the machine is operating by the work who is unloading and loading the metal parts onto the machine to be sprayed. It is replaced when observed to be fully saturated. After the spray coating is applied, the metal parts are hung to dry near an IR heater then baked within Grieve Oven #3 which uses electric heat and has a vent that goes outside with no controls. Next, the metal parts are placed on the HAMR line, which is fully automated. The machine dips the parts in the various baths on the line. The production line contains eight tanks in total and can be switched depending on the needs of the contract. During this inspection, the acid solution tank started at Tank #3 with a rinse just after this tank. Starting at Tank #3 and continuing to Tank #6, there were direct intake ventilation attachments on the tanks that goes to the HAMR scrubber. Acids typically used in this process are nitric acid and hydrofluoric acid. After the acid solution tanks are two rinses and then a tank filled with sodium hydroxide which dissolves off any excess coating still left on the metal part.

Next, the Manual Etch and Prime Production Line, abbreviated by Tech Met as the MLE Line was observed. At the time of this inspection, the MLE Line was not being used because the contract that was using this production line had ended and Tech Met has still been deliberating on whether to keep the production line or re-purpose it for a future contract. This line has a scrubber referred to as the MLE Scrubber which was functioning at the time of inspection and had the following data recorded: 1.5 inches of water, 144 GPM, 8.6 pH. The EPA Inspectors observed the line which contained a total of nine (9) tanks. Two of the tanks held caustic solutions which were 700 gallons each and the remaining tanks were four rinse tanks and five drying tanks. Eight (8) of the tanks had their emissions controlled by a scrubber through an intake vent enclosure.

The final part of the walkthrough, the EPA Inspectors observed the Priming room of the MLE production line which contained two spray booths. One spray booth was used for manual spraying and the other is an automated spray booth that could be programed. Each of the spray booths were connected to vents with filters and a fan for emissions control. Outside of the Priming room is an

electric Grieve Oven #6, which was not being operated at the time of inspection, is vented outside with no controls.

The walkthrough concluded at 12:22 PM.

IV. Records Review

The records review commenced after the plant walkthrough at 14:53 PM. EPA inspectors talked with the Facility about the documents requested in the March 8, 2024 email to Mike Vidra (see Attachment 1). After a discussion about which records were available and the additional records the EPA Inspectors requested in addition to the original request concerning Tech Met's requests for determination and pending installation permits, it was decided that records would be best provided post inspection via the GoAnywhere Link by Mike Vidra. Below are the records requested and what was provided:

1. Provide a plot plan of the Facility. The plot plan should identify each production process unit to include but not limited to: titanium cell etch processing, iron cell etch processing, abrasive blasting operation, maskant room and process heaters.

Facility provided documents via secure link given by the EPA Inspectors post inspection on 4/2/2024.

2. Provide a detailed process description of the facility. This should include a description of each production process unit to include but not limited to: titanium cell etch processes, iron cell etch processes, finished product processing and emission control.

Confirmed the facility had the documents at the time of inspection, facility provided documents via secure link given by the EPA Inspectors post inspection on 4/2/2024.

3. For each of the process production unit, provide the following information:

- a. Date of construction, date operation commenced at the facility;
- b. Date the unit was modified or reconstructed;
- c. Provide the current and historical (as built) production capacity for each unit;

Facility provided documents via secure link given by the EPA Inspectors post inspection on 4/2/2024.

4. 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, HP or kW/hr);
 - iv. Days each unit operated and hours of operation¹ monthly from January 2019 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 2019.
- c. Records of each tune-up conducted at each unit since January 2019.

Facility provided documents via secure link given by the EPA Inspectors post inspection on

4/2/2024.

5. Provide copies of the emission statements submitted to ACHD 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.).
Facility provided documents via secure link given by the EPA Inspectors post inspection on 4/2/2024.
6. Annual emissions calculations (preferably emailed in an unlocked Microsoft Excel format from January 1, 2020 through January 31, 2024, including but not limited to:
 - a. Annual emissions (in tn/yr) of VOCs, PM, NOx, SOx, and HAPs (individual and combined) for each process unit and facility wide along with supporting calculations for (lbs/hr).Facility provided documents via secure link given by the EPA Inspectors post inspection on 4/2/2024.
7. Provide a list of any and each control device currently in use at Tech Met 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 capture and destruction efficiency for each control.The Facility provided documents via secure link given by the EPA Inspectors post inspection on 4/2/2024.
8. Copies of any stack tests conducted on any production process units, engines, or boilers to determine emission rate, control efficiency, or for compliance demonstrations, etc. conducted at the Facility since 2010.
Facility provided documents via secure link given by the EPA Inspectors post inspection on 4/2/2024.
9. Provide a list of each request for permit determination or permit application submitted to the ACHD since January 2020. Also, provide a list of each permit or permitting determination issued to Tech Met. This should include the date of the request/permit and the permit number, if applicable.
Facility provided documents via secure link given by the EPA Inspectors post inspection on 4/2/2024.
10. Provide copies of any initial notifications, compliance reports, and/or periodic reports submitted to either EPA or ACHD pursuant to applicable regulations under 40 C.F.R. Part 60 and 63.
Facility provided documents via secure link given by the EPA Inspectors post inspection on 4/2/2024.

V. Closing Conference

After the records review, EPA inspectors, Mike Vidra, Paige Svetz, Jonathan Yezioro, and Ed Palanko of Tech Met as well as Nick Caito for ACHD had a brief closing conference to ask additional questions and discuss observations. The EPA inspectors noted that the investigation is on-going, and any areas of concern identified in the final report do not necessarily reflect a violation or deviation, rather, they are areas that will require further investigation. EPA also noted that they would issue an inspection report within in 60 days, with a copy to the State. Simultaneously, EPA will perform a detailed review of records and may have additional questions. The inspection concluded at 15:45 PM.

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 Mike Vidra.

- Multiple processes observed during the walkthrough were not in the two Installation Permits provided to the EPA prior to the inspection which included the two recently installed acid tanks, the Chemical Lab Scrubber, and the Zinc Scrubber. The Installation Permits provided to the EPA before the inspection covered both the Titanium and Ferrous cell scrubbers, the two acid waste tanks, the abrasive blasting, the maskant dip room and the process heaters for the Titanium and Ferrous cell production area. Mr. Vidra said that many of these processes had Installation Permits or Request for Determinations submitted to ACHD and were pending approval with exception of the two Acid Waste Tanks which Mr. Vidra said they would be submitting after the inspection.
- Tech Met did not have the manufactures control and treatment efficiency documentation for any of the installed control devices. Mr. Vidra said this would be provided post inspection.
- Despite being at the current location since 2011, Tech Met is operating without an ACHD issued air operating permit.
- During the closing meeting, the applicability of 40 CFR Part 63, Subpart XXXXXX – National Emission Standards for Hazardous Air Pollutants Area Source Standards for Nine Metal Fabrication and Finishing Source Categories and 40 CFR Part 63, Subpart HHHHHH – National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operation at Area Sources was discussed. After discussing these two specific subparts, a general discussion about which regulations were applicable to Tech Met was had. This will require further investigation post inspection.

VI. List of Attachments

- Attachment 1: Email correspondence to Mike Vidra of records requested to review during inspection
- Attachment 2: Photo Log
- Attachment 3: Sign-In Sheet