



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

DATE: NOV 09 2018

SUBJECT: CLEAN AIR ACT INSPECTION REPORT
Kohler Co., Kohler, Wisconsin

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

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

TO: File

BASIC INFORMATION

Facility Name: Kohler Co.

Facility Location: 444 Highland Drive, Kohler, Wisconsin

Date of Inspection: 10/15/18 - 10/16/18

EPA Inspector(s):

1. Dakota Prentice, Environmental Engineer
2. David Sutlin, Environmental Engineer

Other Attendees

1. Michael Cassidy, Manager - EHS Technical Resources, Kohler
2. Howard Beumler - Principal Engineer, Kohler
3. Robert Halfmann - Maintenance, Kohler
4. Derek Mackenzie, Environmental Engineer - Cast Iron Division, Kohler
5. Rachel Rich - Senior Project Engineer - Wisconsin Faucet Operations, Kohler
6. Anna Scoggins, Environmental Engineer Co-Op - Cast Iron Division, Kohler

Contact Email Address: Michael Cassidy - mike.cassidy@kohler.com

Purpose of Inspection: To determine compliance with the facility's operating permits and any applicable federal regulations.

Facility Type: EPA's inspection focused on the facility's foundry operations.

Regulations Central to Inspection: The National Emission Standards for Hazardous Air Pollutants for Iron and Steel Foundries at 40 C.F.R. Part 63, Subpart EEEEE

10/15/18

Arrival Time: 2:10 PM

Departure Time: Approximately 5:00 PM

10/16/18

Arrival Time: 7:45 AM

Departure Time: Approximately 11:00 AM

Inspection Type:

- ☒ Unannounced Inspection
- ☐ Announced Inspection

OPENING CONFERENCE

- ☒ Credentials Presented
- ☒ CBI warning to facility provided

The following information was obtained verbally from Kohler representatives unless otherwise noted.

Process Description:

Iron Melting Operations

The Cast Iron Division produces sinks, bathroom tubs, and engine components. Production starts with the storage of raw material in a scrap metal yard adjacent to the meltshop building. Scrap metal is sent first to a preheater before being charged to one of five 40-ton electric induction furnaces (EIFs). The EIFs each have three emission capture points and are controlled by one baghouse. From the EIFs, the metal is tapped into transfer units and taken to one of three uncontrolled holding furnaces. The holding furnaces feed two uncontrolled mold lines. At the mold lines the molten iron is poured into molds of final products. Cast products leaving the mold line move to finishing operations including shot blasting, grinding, and enamel application.

Brass Melting Operations

Kohler has five 1,200-pound brass melting furnaces used to produce various brass components used in bathroom and kitchen faucets. Kohler uses a non-lead brass alloy (< 0.15% lead) and a leaded brass alloy (< 1.4% lead). The brass furnace emissions are routed to one of two stacks but are not controlled. From the brass furnaces, a ladle transports the molten brass to one of five casting units. At the casting units the molten brass is poured into a mold creating a final shape.

Staff Interview:**Iron Melting**

Due to a fire, the facility recently replaced two of the EIFs with two higher capacity EIFs; however, the overall capacity was limited by stepping down the voltage on one or more of the four power supplies for the five EIFs. The facility is also in the process of replacing one of its cast iron mold lines.

Brass Melting

Leaded brass products are used in non-potable water applications such as shower heads.

TOUR INFORMATION

EPA toured the facility: Yes

Data Collected and Observations:

During the plant tour, EPA observed the bag leak detection system readings at the electric melt baghouse control panel. The particulate level readings at "NW BH" remained at 0.000 milliamperes, while other particulate level readings appeared to fluctuate.

Photos and/or Videos: were taken during the inspection.

Field Measurements: were not taken during this inspection.

CLOSING CONFERENCE

EPA expressed concern that the BLDS system at the electric melt baghouse may not be operating properly.

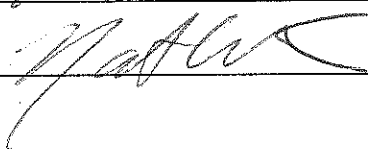
SIGNATURES

Report Author:



Date: 11/2/18

Section Chief:



Date: 11/9/18

Facility Name: Kohler Co.

Facility Location: 444 Highland Drive, Kohler, Wisconsin

Date of Inspection: 10/15/18 - 10/16/18

APPENDICES AND ATTACHMENTS

1. Appendix A: Digital Image Log

Facility Name: Kohler Co.

Facility Location: 444 Highland Drive, Kohler, Wisconsin

Date of Inspection: 10/15/18 - 10/16/18

APPENDIX A: DIGITAL IMAGE LOG

1. Inspector Name: D. Sutlin	2. Date(s) of Inspection: 10/15/18 - 10/16/18
3. Company/Facility Name: Kohler Co.	4. Street Address, City, State: 444 Highland Drive, Kohler, Wisconsin
5. Number of Images: 1	6. Archival Record Location: CD-R labeled as "Kohler Photo Log"

Image Number	File Name	Date and Time (CDT)	Latitude and Longitude	Description of Image
1	PA160001	10/16/2018 8:43	Not Recorded	Electric Induction Furnaces

