



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

OCT 02 2019

DATE:

SUBJECT: CLEAN AIR ACT INSPECTION REPORT
EDCO Products Inc., Hopkins, MN

FROM: Luke Hullinger, Environmental Engineer
AECAB (MI/WI)

THRU: Ethan Chatfield, Acting Section Chief
AECAB (MI/WI)

TO: File

BASIC INFORMATION

Facility Name: EDCO Products Inc.

Facility Location: 8700 Excelsior Blvd, Hopkins, MN

Date of Inspection: 8/12/2019

EPA Inspector(s):

1. Luke Hullinger, Environmental Engineer
2. Kenneth Ruffatto, Environmental Engineer

Other Attendees

1. Mike DiSimone, EHS Facilities Specialist, EDCO Products Inc.
2. Jeffrey Williams, VP of Manufacturing, EDCO Products Inc.

Contact Email Address: mdesimone@edcoproducts.com and jwilliams@edcoat.com

Purpose of Inspection: Clean Air Act Inspection

Facility Type: Coating applicator for roof and siding panels

Regulations Central to Inspection: NESHAP MMMM and NESHAP SSSS

Arrival Time: 2:00 PM

Departure Time: 4:00 PM

Inspection Type:

- ☒ Unannounced Inspection
- ☐ Announced Inspection

OPENING CONFERENCE

- ☒ Credentials Presented
- ☒ CBI warning to facility provided

The following information was obtained verbally from Mike DeSimone and Jeffery A. Williams unless otherwise noted.

Process Description:

EDCO Products Inc. is a metal siding and roofing coating facility located in Hopkins, MN. Steel and aluminum coils are brought in on trucks and then used to produce painted parts for siding or roofing. The metal coils are unrolled, cleaned, and coated with pretreatment, which is a polyester coating. Next, the pretreated metal is cured in an infrared oven and is coated with the top coat. Then, the metal is cured in a natural gas oven, quenched in a water bath, and either sold to a customer for siding use or sent to the roofing area of the plant for further processing. The metal coils that are used for roofing go through the same process except there is no pretreatment process, and the metal is pressed into a roofing shape after the water quench.

Staff Interview: There is a fume hood over both paint application lines. The paint lines, infrared oven, and curing oven are vented to a thermal oxidizer. Air flow is continuously monitored into the coating room. Quarterly inspections are conducted for the air flow sensors. A monthly visual inspection is conducted on the duct work conveying emissions to the thermal oxidizer.

TOUR INFORMATION

EPA toured the facility: Yes

Data Collected and Observations:

The facility was not running during the inspection.

Photos and/or Videos: were not taken during the inspection.

Field Measurements: were not taken during this inspection.

RECORDS REVIEW

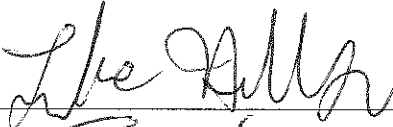
1. 2018 compliance summary

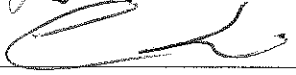
CLOSING CONFERENCE

Requested documents:

- 2016 thermal oxidizer stack test
- Last 2 years of deviation reports
- 2019 emissions summary report with calculations

SIGNATURES

Report Author:  Date: 10/3/2018

Section Chief:  for Eihan Chatfield Date: 10/3/2018

Attachment B-1
MACT Compliance Spreadsheet
Summary, 2018

EDCO Products Inc.

	Jan-19	Feb-19	Mar-19	Apr-19	May-19	Jun-19	Jul-19	Aug-19	Sep-19	Oct-19	Nov-19	Dec-19	2019
Coil													
lb hap uncontrolled	2108.21	1422.53	2340.61	2829.17	2868.35	2343.00	2267.30	0.00	0.00	0.00	0.00	0.00	16179
lb hap	105.41	71.13	117.03	141.46	143.42	117.15	113.36	0.00	0.00	0.00	0.00	0.00	809
gallons	3344.00	2674.00	3661.00	5587.00	4603.00	4483.00	3845.00	0.00	0.00	0.00	0.00	0.00	28197
gal solids	1435.74	1126.63	1305.14	2707.99	1946.57	2070.45	1564.98	0.00	0.00	0.00	0.00	0.00	12158
lb hap/gal solids	0.07342	0.06313	0.08967	0.05224	0.07368	0.05658	0.07244						0.06654
lb hap/gal solids	0.07342	0.06313	0.08967	0.05224	0.07368	0.05658	0.07244	0.00000	0.00000	0.00000	0.00000	0.00000	0.06654
Shingle													
lb hap	114.66	85.87	107.85	124.04	141.62	84.17	127.25	0.00	0.00	0.00	0.00	0.00	785
gallons	137.00	96.50	129.55	139.75	163.00	95.00	143.50	0.00	0.00	0.00	0.00	0.00	904
gal solids	16.16	12.13	15.20	17.54	20.20	11.83	17.98	0.00	0.00	0.00	0.00	0.00	111
lb hap/gal solids	7.10	7.08	7.09	7.07	7.01	7.12	7.08						7.1
lb hap/gal solids	7.10	7.08	7.09	7.07	7.01	7.12	7.08	0.00	0.00	0.00	0.00	0.00	7.1
Limit (lb HAP/gallon solids)	0.401	0.400	0.401	0.394	0.400	0.393	0.401	0.384	0.384	0.384	0.384	0.384	0.398
Limit (kg HAP/liter solids)	0.048	0.048	0.048	0.047	0.048	0.047	0.048	0.046	0.046	0.046	0.046	0.046	0.048
Monthly Value (lb HAP/gallon solids)	0.152	0.138	0.170	0.097	0.145	0.097	0.152	NA	NA	NA	NA	NA	0.130
Monthly Value (kg HAP/liter solids)	0.018	0.017	0.020	0.012	0.017	0.012	0.018	NA	NA	NA	NA	NA	0.016
Meet limit?	YES	YES	YES	YES	YES	YES	YES	NA	NA	NA	NA	NA	YES

Jan19-Jun19	Jul19-Dec19	2019
13912	2267	16179
696	113	809
24352	3845	28197
10593	1565	12158
0.066	0.072	0.067
0.066	0.072	0.067

658	127	785
761	144	904
93	18	111
7.1	7.1	7.1
7.1	7.1	7.1

0.397	0.401	0.398
0.048	0.048	0.048
0.127	0.152	0.130
0.015	0.018	0.016
YES	YES	YES

Example Calculation (January 2019)

Total Coil Controlled HAP (MACT SSSS) 105.41 lb HAP
Total Coil Gallon Solids 1435.74 Gallon Solids

Total Shingle HAP (MACT MMMM) 114.66 lb HAP
Total Shingle Gallon Solids 16.16 Gallon Solids

Calculated Limit Formula (lb HAP/gallon solids) = (Total Coil HAP + Total Shingle HAP)/(Total Coil Gallon Solids + Total Shingle Gallon Solids)
= (105.41+114.66)/(1435.74+16.16)
= 0.152 lb HAP/gallon solids

Conversion Factor
lb HAP/gallon solids * (453.6 g/lb * kg/1000 g) * (7.481 gallon/28.32 liters)
= 0.1515757 lb HAP/gallon solids * Conversion Factor
= 0.018 kg HAP/liter solids

Total HAP	1594	lb/yr
Total HAP	0.80	ton/yr