



REGION 3

PHILADELPHIA, PA 19103

Report Title: Clean Air Act Inspection of ATI Precision Finishing
Inspection Date(s): 06/05/2024
Regulatory Program(s): CAA MACT
Facility Name: ATI Precision Finishing - Monaca
Facility Location: 2070 Pennsylvania Ave
Monaca, PA 15061
Latitude: 40.68515 **Longitude:** -80.26783
County/Parish: Beaver County
AFS/ICIS-Air Number: 16725711
Permit Number: N/A
NAICS Code: 332312
DSB ID #: ECAD - 70

Facility Representatives: **Point of Contact**

Deborah Calderazzo, Director, Environmental Affairs ☒

Phone: (724)226-5947 Email: Deborah.calderazzo@ATImaterials.com

**Additional Facility Representatives identified in report body and an attached sign in sheet.*

EPA Inspectors:

Parmatma Adhikari, Air Inspector

Phone: (215)814-2161 Email: Adhikari.parmatma@epa.gov

Paul Arnold, Air Inspector

Phone: (215)814-2194 Email: Arnold.paul@epa.gov

Steven Ott, Air Inspector

Phone: (215)814-2267 Email: Ott.steven@epa.gov

State/Local Inspectors:

Scott Beaudway, Air Quality Specialist, PADEP

Phone: (412)417-7952 Email: sbeaudway@pa.gov

EPA Lead Inspector

Signature

Parmatma Adhikari

Date

1600 John F Kennedy Blvd
Philadelphia, PA 19103-2852

Supervisor

Signature

Martin Matlin

Date

Table of Contents

I. Introduction	3
A. Summary of the Facility.....	3
B. Inspection Opening Conference.....	3
II. Site Activity/Process Description	4
III. Observations	4
IV. Records Review	5
V. Closing Conference	7
VI. List of Attachments	9

I. Introduction

The United States Environmental Protection Agency (EPA) conducted a Clean Air Act (CAA) inspection at ATI Precision Finishing LLC - Monaca (ATI or Facility) to verify compliance with applicable State and Federal regulations. The Pennsylvania Department of Environmental Protection (PADEP) was notified of the inspection on May 14, 2024, via email. On May 31, 2024, EPA notified the Facility of the planned inspection via phone and email. EPA emailed a list of records for review to Deborah Calderazzo and William McCaslin, 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 this report.

A. Summary of the Facility

The Facility is located at 2070 Pennsylvania Ave, Monaca, PA 15061. ATI provides finishing services that includes surface grinding, precision grinding & polishing, abrasive saw cutting, band saw cutting, shearing, non-destructive testing, vacuum creep flattening (VCP) and water jet cutting.

The Facility does not have any federal or state CAA permits. The Facility is subject to, or potentially subject to the following federal regulations:

- 40 CFR 63 Subpart WWWW—National Emission Standards for Hazardous Air Pollutants: Area Source Standards for Plating and Polishing Operations
- 40 CFR 63 Subpart XXXXX—National Emission Standards for Hazardous Air Pollutants Area Source Standards for Nine Metal Fabrication and Finishing Source Categories

B. Inspection Opening Conference

At 9:30 AM on June 5, 2024, EPA inspectors arrived at the Facility for a CAA Inspection and conducted a brief opening conference. ATI was represented by Deborah Calderazzo (Director, Environmental Affairs), Andrew Blanchard (Superintendent of Operation), Mark Sedlak (Environmental Engineer), and Mike Stesiak (Superintendent of Maintenance). Also, Scott Beaudway, Air Quality Specialist from PADEP was present. EPA inspectors, Parmatma Adhikari, Paul Arnold and Steven Ott, presented their credentials and explained the purpose of the visit was to conduct a CAA inspection to determine compliance with any applicable regulations. Additionally, EPA informed the facility representatives of their right to claim any confidential business information (CBI). At that time, the Facility did claim any process related information and photos as CBI. On June 7, 2024, Deborah Calderazzo, of ATI, emailed and claimed furnace dimensions and temperature (kneeling temperature) as CBI.

II. Site Activity/Process Description

ATI Monaca was established in the late 1990s. This facility is one of ATI's finishing services providers. ATI also operates two additional finishing services provider facilities (Rochester and Zelienople) in Pennsylvania. This facility covers an area of about 10 acres and has two buildings measuring 82x722 sq ft and 124x463 sq ft. There are currently 94 employees at the facility, and it operates 24 hours a day, Monday through Friday.

ATI's process equipment includes: two (2) precision wet grinders (wet belt sanders), five (5) gantry wet grinders (wet belt sanders for dry use with a small percentage of stainless plate), four (4) vacuum creep flattening (VCF) electric furnaces, one (1) acetylene torch cutter, four (4) wet cutting bandsaws, three (3) waterjet cutters, one (1) abrasive wet saw with Rotoclone emissions control device, and one (1) mechanical shear.

The process at the Monaca Facility involves several key stages. First, specialty metals plate (raw material) undergoes grinding and polishing using various equipment, including precision and gantry wet grinders. The material goes through annealing or heat treating in four vacuum creep flattening electric furnaces. The next step involves cutting the material using an acetylene torch cutter with a smoke eater filter, wet cutting bandsaws, waterjet cutters, and an abrasive wet saw. Finally, the finished plate is inspected at ultrasonic testing stations before being packaged and shipped to the customer on wooden pallets or boxes. Each vacuum creep-flattening electric furnace has a cooling tower and an abrasive wet saw equipped with a Rotoclone (an emission control device).

The facility has one 300 gallons above ground diesel storage tank. The Facility does not have any underground storage tanks, emergency generator, or process boiler.

The opening conference concluded at 10: 10 AM.

III. Observations

EPA inspectors were led on a walkthrough of the Facility at 10:15 AM by Deborah Calderazzo, Andrew Blanchard, Mark Sedlak, and Mike Stesiak of ATI. Scott Beaudway from PADEP was also present for the walkthrough. EPA inspectors noted photos would be taken during the Facility walkthrough (Attachment 2).

The walkthrough started with observing the VCF electric furnace in building #1. Physically, areas designated as buildings #1 and #2 are a single building; ATI separates them into two parts for convenience. Similarly, areas designated as buildings #3 and #4 are also a single building, with no physical separation. Mr. Blanchard mentioned that the raw material (stainless and specialty alloy plate, a product from the ATI Washington facility) is placed over the furnace and heated, for about 6-8 hours, to reach a specific temperature to straighten the deflected metal plate. From the VCF furnace, the metal plate undergoes a non-contact cooling process. Each furnace has a single-cell cooling tower outside Building #1. EPA inspectors observed the cooling towers 3, 1, 2, and 4 placed from left to right.

The inspection team advanced to observe the precision grinding area. There were two precision grinding machines, one measuring 48" wide and the other 60" wide. ATI mentioned that both Precision Grinding machines perform identical functions but differ in size. Both precision grinding operations use water for dust control, so ATI refers to them as wet grinding. ATI mentioned that each grinding operation takes about four hours.

From the precision wet grinder observation, the Inspection team advanced toward the acetylene torch cutter. ATI mentioned that the acetylene torch cutter had a 'smoke eater filter,' which means it doesn't vent emission outside. Then, the inspection team was guided to the ultrasonic testing stations. ATI mentioned that ultrasonic testing is non-destructive and required to ensure the finished product's quality.

Then, the inspection team observed both vertical and horizontal bandsaws. ATI mentioned that both types are used for wet cutting, with water being used to suppress dust. The inspection team also observed waterjet cutters and gantry wet grinders, which are wet belt sanders. ATI mentioned using dry belt sanders for a small percentage of stainless plates. After exiting the building, the inspection team proceeded to buildings #3 and #4. In building #3, the inspection team first observed three gantry wet grinders. The EPA inspection team observed an abrasive wet saw equipped with a Rotocolone (an emissions control device). ATI mentioned that the area after the abrasive wet saw is considered Building #4.

Additionally, the inspection team noticed the maintenance shop in the corner of buildings #3 and #4, which ATI uses for general equipment maintenance. The inspection team observed a small grinding machine, drill press, and portable MIG welder in the maintenance shop. Finally, inspection team observed waterjet cutters and the material packing and shipping area in building #4.

The walkthrough concluded at 11:30 PM.

IV. Records Review

The records review commenced immediately after the plant walkthrough at 11:40 AM. EPA inspectors reviewed documents requested in the May 31, 2024, email to Deborah Calderazzo and William McCaslin (see Attachment 1). Records were provided at the time of the inspection by Deborah Calderazzo. Below are the records requested and discussed during the inspection:

1. Provide a plot plan of the Facility that identifies each production process unit/area, emission controls and exhaust stack locations.
⇒ *ATI provided a plot plan of the Facility at the time of inspection.*
2. Copy of any current Clean Air Act (CAA) operating permit (Title V or state-only) and all installation/construction permits issued to the Facility.
⇒ *ATI mentioned that they do not have any CAA operating permits or installation /construction permits.*

3. Provide the potential to emit PM, NO_x, SO₂, VOC, and HAP for the Facility. The potential to emit shall include the calculations and emission factor for each pollutant and the derivation of each emission factor.

⇒ *ATI provided the potential to emit (PTE) calculation for PM₁₀, NO_x, CO, VOC, SO₂, chromium (Cr), nickel (Ni), and manganese (Mn). The PTE calculation is summarized in the following table.*

Emissions Unit	PM ₁₀	NO _x	CO	VOC	SO ₂	Cr	Ni	Mn
	Tons/Year							
Torch Cutter	0.005	0.04						
VCF Furnace 1 Cooling Tower	0.06							
VCF Furnace 2 Cooling Tower	0.06							
VCF Furnace 3 Cooling Tower	0.06							
VCF Furnace 4 Cooling Tower	0.06							
Abrasive Saw & Rotocolone	0.18					0.0041	0.0014	0.0003
Five (5) Gantry Grinders	0.06					0.0002	0.00006	0.00001
Natural Gas Usage	0.03	0.39	0.32	0.02	0.002			

4. Provide the actual PM, NO_x, SO₂, VOC, and HAP emissions for 2020 -2023. Include the calculations and emission factors for each pollutant and the derivation of each emission factor.

⇒ *ATI provided facility-wide emission from 2020 to 2023 for PM₁₀, NO_x, CO, VOC, SO₂, Cr, Ni, and Mn. The facility-wide emission is summarized in the following table.*

Year	PM ₁₀	NO _x	CO	VOC	SO ₂	Cr	Ni	Mn
	Tons/year							
2020	0.25	0.17	0.14	0.01	0.001	0.0015	0.0005	0.0001
2021	0.20	0.22	0.18	0.01	0.001	0.0009	0.0003	0.0001
2022	0.23	0.27	0.22	0.01	0.002	0.0011	0.0004	0.0001
2023	0.27	0.28	0.22	0.01	0.002	0.0014	0.0005	0.0001

5. For each fire pump, generator, or engine located onsite, provide:
- The make and model of the unit;

- b. The size of the unit (HP and displacement (L));
 - c. Fuel amount and type combusted monthly (gallons) from January 2022-present;
 - d. Hours of operation monthly from January 2021-present.
- ⇒ *ATI mentioned that the information does not apply to the Facility since they do not have a fire pump, generator, or engine.*
6. Provide copies of plan approval applications or requests for permitting determination documents submitted to, or received from, a local agency, State, or EPA from January 1, 2015, through December 31, 2023.
- ⇒ *ATI mentioned that they never requested permitting determination.*
7. Provide Copies of any performance tests conducted on any source to determine emission rates, concentrations, or compliance since 2015.
- ⇒ *ATI mentioned that they have not conducted any performance tests in the past.*
8. Provide copies of any initial notifications or periodic reports submitted to either EPA or PADEP for any regulations under 40 CFR Part 60 or Part 63.
- ⇒ *ATI mentioned that the information does not apply to the Facility. ATI was unaware of any regulations under 40 CFR Part 60, 61, or 63 that may be applicable.*
9. Provide records of any visible emissions monitoring conducted at the Facility from January 2022 to present. This includes Method 9 observations or any general visible emission monitoring.
- ⇒ *ATI mentioned that they have not conducted any visible emission monitoring.*
10. Provide copies of any enforcement actions issued to the ATI Precision Finishing LLC - Monaca Facility by PADEP or EPA for any media since 2017.
- ⇒ *ATI mentioned that PADEP or EPA has not taken any enforcement actions.*

V. Closing Conference

After the records review, EPA inspectors, Deborah Calderazzo, Andrew Blanchard, Mark Sedlak, Mike Stesiak of ATI and Scott Beaudway of PADEP 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 sixty (60) days, with a copy to the State. Simultaneously, EPA will perform a detailed review of records and may have additional questions.

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 ATI.

- The Potential to Emit (PTE) calculation only covers some emission sources. It is currently based only on emissions from torch cutters, VCFs, gantry grinders, and natural gas usage for space heating.

- ATI provided facility-wide emissions data for PM₁₀, NO_x, VOC, SO₂, chromium (Cr), nickel (Ni), and manganese (Mn) from 2020 to 2023. However, the derivation of the emission factor is not clarified.
- As ATI uses materials containing metal fabrication or finishing metal HAP (MFHAP) such as Cr, Ni, and Mn, it is more likely to be subject to 40 CFR 63, Subpart XXXXX. EPA needs additional information to determine the applicability of 40 CFR 63, Subpart XXXXX.

The inspection concluded at 1:00 PM.

VI. List of Attachments

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