



REGION 5

CHICAGO, IL 60604

MEMORANDUM

SUBJECT: CLEAN AIR ACT INSPECTION REPORT
Victory White Metal Company, Cleveland, Ohio

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

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

TO: File

BASIC INFORMATION

Facility Name: Victory White Metal Company

Facility Location: 3027 East 55th Street, Cleveland, Ohio

Date of Inspection: November 15, 2023

EPA Inspector(s):

1. Dakota Prentice, Environmental Engineer
2. Liam Klaiman, Environmental Engineer
3. Meaghan Pashen, Environmental Engineer

Other Attendees:

1. Ben Krafcik, Victory White Metal Company – Quality Manager

Contact Email Address: Ben Krafcik – bkrafcik@vwmc.com

Purpose of Inspection: to determine compliance with the Ohio state implementation plan (SIP)

Facility Type: Lead Alloy Manufacturing

Regulations Central to Inspection: Ohio SIP

Arrival Time: 8:30am

Departure Time: 9:45am

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 Ben Krafcik unless otherwise noted.

Process Description:

The facility produces lead alloy products including anodes, solder, ingots, and billets. Production starts at one of five melt pots in the casting area. At the melt pots, lead ingots are melted down with additional metals, typically tin and/or antimony, added to meet final product specifications. The melt pots are controlled by the facility's one baghouse. Process cycle times range from approximately one to three days. At the end of the cycle, the metal is cast to produce ingots or billets. Ingots are final products, while most billets move to extrusion. At one of three extrusion melt pots, the billets are melted down then extruded into wire or anodes. Emissions from the extruder melt pots are controlled by the baghouse. Final products are then shipped to customers.

Staff Interview: The facility operates Monday through Friday from 7:30am to 4:30pm and employs 30 people, 20 on the shop floor and 10 in the office. The facility does not have an air permit from Ohio EPA. There are respirator areas at the facility, including at casting and cutting. Blood-lead monitoring is conducted for facility personnel. The melt pots typically maintain some molten metal while the facility is not in operation. The baghouse may not always be operated while the furnaces contain molten lead. Baghouse fires have occurred previously. In response to these fires, a fire suppression system was installed at the baghouse. No previous emissions testing has been conducted at the baghouse.

TOUR INFORMATION

EPA Tour of the Facility: Yes

Data Collected and Observations:

EPA observed the five melt pots in the casting area. The largest melt pot, a 40,000 pound capacity unit, is currently not in operation due to a broken conveyor. EPA observed open roof monitors in the room containing these melt pots. Each melt pot has a hood for emission capture. At the extrusion process, EPA asked about a lack of airflow at a hood over a melt pot. EPA was informed that the facility's baghouse was not in operation. Facility personnel then turned the baghouse on. There is

neither monitoring nor specified operating parameter limits for baghouse pressure drop. The pressure drop across the baghouse at the time of the inspection, when operational, was approximately 0.1 inches of water. EPA observed building openings between respirator and non-respirator areas of the shop and building openings to atmosphere.

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

See Appendix A.

Field Measurements: were not taken during this inspection.

CLOSING CONFERENCE

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

Requested documents:

- Information on baghouse capacity;
- Baghouse manufacturers recommended operating conditions;
- Baghouse performance test records, if testing has been performed;
- Any permit documentation or communications with Ohio EPA and/or Cleveland Department of Public Health related to air emissions; and
- Facility emissions calculations.

Concerns: EPA noted the failure to operate the baghouse while lead emission units were in operation as an area of concern.

DIGITAL SIGNATURES

Report Author: **DAKOTA PRENTICE** Digitally signed by
DAKOTA PRENTICE
Date: 2023.11.27
09:38:16 -06'00'

Section Supervisor: **NATHAN FRANK** Digitally signed by
NATHAN FRANK
Date: 2023.11.30
16:47:57 -06'00'

Facility Name: Victory White Metal Company
Facility Location: 3027 East 55th Street, Cleveland, Ohio
Date of Inspection: November 15, 2023

APPENDICES AND ATTACHMENTS

Appendix A: Digital Image Log

Facility Name: Victory White Metal Company
Facility Location: 3027 East 55th Street, Cleveland, Ohio
Date of Inspection: November 15, 2023

APPENDIX A: DIGITAL IMAGE LOG

1. Inspector Name: M. Pashen	2. Archival Record Location: Region 5 Electronic Record Center
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Image Number	File Name	Date and Time (incl. Time zone and DST)	Latitude and Longitude	Description of Image
1	IMG_0441.JPG	2023:11:15 09:21:41	Not Available	Furnace Nos. 15, 16, 17, and 18
2*	IMG_0442.JPG	2023:11:15 09:25:27	Not Available	Extrusion Machine
3	IMG_0443.JPG	2023:11:15 09:29:35	Not Available	Baghouse
4	IMG_0444.JPG	2023:11:15 09:30:11	Not Available	Baghouse and duct run from furnaces

* Image No. 2 of the Extrusion Machine was claimed as confidential business information