



REGION 5

CHICAGO, IL 60604

MEMORANDUM

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

FROM: Justin Smith, Environmental Engineer
AECAB (IL/IN)

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

TO: File

BASIC INFORMATION

Facility Name: EDCO Products Inc (EDCO)

Facility Location: 8700 Excelsior Blvd, Hopkins, MN

Date of Inspection: April 8, 2025

EPA Inspector(s):

1. Justin Smith, Environmental Engineer
2. DeMarkus Hodge, Environmental Engineer

Other Attendees:

1. Chad Hanlon, Paint Project Manager, EDCO
2. Jesse Klover, Project Engineer, EDCO
3. Matt Schleicher, Director of Manufacturing, EDCO
4. Patrick Hecht, Environmental Specialist, Minnesota Pollution Control Agency (MPCA)

Contact Email Address: Todd Strand, EHS Manager, EDCO (not in attendance)
tstrand@edcoproducts.com

Purpose of Inspection: To determine facility's compliance with its Air Permit, ID # 05301047-102, and its compliance with the National Emission Standards for Hazardous Air Pollutants: Surface Coating of Metal Coil (NESHAP SSSS).

Facility Name: EDCO Products Inc
Facility Location: 8700 Excelsior Blvd, Hopkins, MN
Date of Inspection: April 8, 2025

Facility Type: Steel Roof and Siding Manufacturing

Regulations Central to Inspection: The facility is subject to their federally enforceable Air Permit and NESHAP SSSS.

Arrival Time: 8:30 AM

Departure Time: 10:15 AM

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

Was any information collected during the inspection claimed as CBI?

☐ Yes ☒ No.

The following information was obtained verbally from EDCO staff unless otherwise noted.

Process Description:

The facility manufactures residential steel roofing and siding panels, using hot-dipped galvanized steel and aluminum coils as primary raw materials. The coils are delivered to the facility via semi-trailer trucks. In addition, solvents and coating materials (such as primers and topcoats) are received in drums and stored in the chemical storage area.

Coils are loaded onto an uncoiling machine and fed into a continuous coil coating line. The metal strip passes through two cleaning tanks to remove oils and dirt, and then through two rinse stages to eliminate cleaning agents or residues. A chemical pretreatment is applied to enhance coating adhesion. After pretreatment, the coil enters a priming station, where a layer of primer is roll-coated onto the strip. The primed coil then passes through an infrared (IR) curing oven, which dries and cures the primer layer. Emissions from the IR are captured and routed to a thermal oxidizer (TO). The strip is then cooled via a quench tank and a topcoat is applied through roll coating. The coated strip then passes through a gas-fired curing oven to fully cure the topcoat. Emissions from the gas oven are also directed to the TO. The strip is cooled again in a quench tank and is rerolled into a tight coil. The coil is inspected for defects and then packaged for storage or shipment. Both the prime and topcoat application zones are operated within an enclosure where air flow is monitored.

Staff Interview:

There are two separate air flow monitors for the prime and topcoat enclosures. The airflow into the enclosures is usually between 250 and 300 feet per minute (ft/min), and the airflow must be at a minimum of 200 ft/min. The minimum temperature limit for the TO is 1200 degrees Fahrenheit (°F). The TO and burners are inspected quarterly and the last performance test for the TO occurred approximately three years ago.

TOUR INFORMATION

EPA Toured the Facility: Yes

Data Collected and Observations:

EPA brought a FLIR optical gas imaging camera during the tour. At the time of the inspection, the coating line was not in operating due to a hydraulic fluid issue with the rewind coil machine. No emissions were seen with the FLIR coming from the coating enclosures or the ductwork to the TO.

EPA reviewed the control panel display for the TO and observed a current operating temperature of 1206 °F. EPA also examined the control panel monitoring airflow into the two coating enclosures. At the time of observation, both enclosures indicated airflow readings of less than 100 ft/min directed into the enclosures. Facility staff explained that the low airflow was due to coating line not being in operation and an enclosure door being opened. Staff further stated that the Continuous Parameter Monitoring System (CPMS) does not record airflow readings when the enclosure doors are open.

EPA reviewed the facility's "Hourly Incinerator Temperature Chart" for the TO, where staff manually record the temperature every 15 minute. EPA informed facility staff that some of the recorded temperature values were below 1200 °F. The facility staff adjusted the TO set point temperature from 1200 °F to 1207 °F, stating that the standard operating set point is typically 1207 °F. Staff indicated that the set point has likely been changed to 1200 °F during a quarterly inspection conducted on March 31, 2025.

Photos and/or Videos: were taken during the inspection and are listed in Appendix A.

Field Measurements: were not taken during this inspection.

CLOSING CONFERENCE

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

Requested documents:

- Semi-annual Reports for years 2023 and 2024;
- Thermal Oxidizer temperature logs (in 3-hour blocks) between January 1, 2023, and April 7, 2025;
- Scanned copy of the daily 15-minute Thermal Oxidizer logs between April 1, 2025, and April 7, 2025;

Facility Name: EDCO Products Inc
Facility Location: 8700 Excelsior Blvd, Hopkins, MN
Date of Inspection: April 8, 2025

- Latest Stack Test for the Thermal Oxidizer;
- Coating Enclosure air flow logs between February 1, 2025, and April 7, 2025; and
- Most recent Operation and Maintenance Plan.

DIGITAL SIGNATURES

Report Author: JUSTIN SMITH Digitally signed by JUSTIN SMITH
Date: 2025.05.09 15:06:29 -05'00'

Section Supervisor: Frank, Nathan Digitally signed by Frank, Nathan
Date: 2025.05.09 16:45:17 -05'00'

APPENDICES

1. Appendix A: Digital Image Log and Digital Video Log

APPENDIX A: DIGITAL IMAGE LOG AND DIGITAL VIDEO LOG

Inspector Name: DeMarkus Hodge **Archival Record Location:** *Enf_EDCO_MN_InspRep/Photos*

Image Number	File Name	Date and Time	Description of Image
1	P4080015.JPG	4/8/25 - 9:17 AM	TO temperature display on control panel
2	P4080016.JPG	4/8/25 - 9:17 AM	Enclosure air flow display on control panel
3	P4080017.JPG	4/8/25 - 9:26 AM	TO controller display after facility adjustment
4	P4080018.JPG	4/8/25 - 9:26 AM	Additional TO controller display
5	P4080019.JPG	4/8/25 - 9:27 AM	Hourly Incinerator Temperature Chart