



REGION 3

PHILADELPHIA, PA 19103

Report Title: Clean Air Act Inspection of CR&S
Inspection Date(s): March 13, 2024
Regulatory Program(s): MACT

Company Name: CR&S
Facility Name: CR&S
Facility Location: 6588 Mason Dixon Hwy
Blacksville, WV 26521
Latitude: 39.72150881095056, **Longitude:** -80.23630525723514
County/Parish: Monongalia County, West Virginia and Green County,
Pennsylvania

AFS/ICIS-Air Number: ICIS 03000WV00018
Permit Number: N/A
NAICS Code: 562111 **SIC:** 4212
DSB ID #: ECAD-5449

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EPA Lead Inspector

Signature

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Date

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Supervisor

Signature

Kristen Hall

Date

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I. Introduction

The United States Environmental Protection Agency (EPA) conducted a Clean Air Act (CAA) inspection at CR&S (CR&S or Facility) to verify compliance with applicable State and Federal regulations. The Pennsylvania Department of Environmental Protection (PADEP) and West Virginia Department of Environmental Protection (WVDEP) were notified of the inspection on February 26, 2024, via email. The Facility owner, Mr. Neil Chisler, was notified in person on March 12, 2024.

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 Section A. Summary of the Facility.

A. Summary of the Facility

The Facility is located at 6588 Mason Dixon Hwy. Blacksville, WV 26521. CR&S is a solid waste and recycling hauling company, with the business property spanning across the WV and PA state line.

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 Part 63: Subpart ZZZZ – National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines

B. Inspection Opening Conference

EPA inspectors arrived at the Facility on March 13, 2024, for a CAA Inspection and conducted a brief opening conference at 9:56 am. CR&S was represented by the company owner Neil Chisler. Also present was Dana Donovan – Environmental Trainee from PADEP and Brian Tephabock – Regional Office Supervisor from WVDEP. EPA inspectors, Alex Everhart and Stafford Stewart presented their credentials and explained the purpose of the visit was to conduct a CAA inspection to determine compliance with any applicable CAA regulations. Additionally, EPA informed the facility representatives of their right to claim any confidential business information (CBI). At that time, CR&S did not claim any photos or documentation as CBI.

II. Site Activity/Process Description

Neil Chisler stated that CR&S stands for Chissy's Recycling and Solid Waste and he is the sole owner of CR&S. He stated it was founded in 2010 when he bought three separate waste hauling companies located in West Virginia and Pennsylvania and combined them into one. In 2018 Mr. Chisler purchased the property located at 6588 Mason Dixon Hwy to use the home located at the property as the office

for CR&S. The Facility footprint is approximately two acres. Mr. Chisler stated that CR&S has both a West Virginia and Pennsylvania business License. CR&S has four full time employees and four part time employees and operates Monday through Friday 7:00 AM to 5:00 PM. He stated that CR&S has ten trash trucks and two “roll-off” trucks. Mr. Chisler stated that CR&S picks up residential waste with the trash trucks and both commercial waste and residential waste with the roll-off trucks in containers, but he typically only operates five trucks a day. He stated that waste is picked up in both Pennsylvania and West Virginia from households and commercial businesses; however no industrial facilities are served by CR&S. Mr. Chisler also stated the only waste from oil and gas facilities in the area that he accepts are used piping and “regular” trash. In addition to waste being brought to the Facility by CR&S trucks the public can also bring in residential waste and drop it off. CR&S has one scale that is used to track incoming and outgoing waste. Mr. Chisler stated that CR&S has a temporary transfer station permit from Pennsylvania and no hazardous or liquid waste is accepted by CR&S.

Mr. Chisler stated that he has one mechanic on-site that performs routine maintenance such as changing tires and replacing brakes and changing oil on the Facility’s trucks and equipment. Mr. Chisler stated CR&S has a 500 gallon off road diesel tank used for CR&S equipment and a 4,000 gallon on-road diesel storage tank used for fueling the on-road equipment.

Mr. Chisler stated his typical process is to send the trash trucks directly to the landfill or local transfer station while the roll-off containers are brought back to the Facility. Once at the Facility the waste is sorted and segregated. Mr. Chisler stated that metals are pulled out and sorted based on their type prior to being sent out to a metal processing facility. Mr. Chisler stated that no waste is stored or stockpiled at the facility only materials to be recycled are allowed at the facility after the close of the day. He stated that he averages disposing of approximately 25 tons of waste per day. Mr. Chisler stated that in addition to pulling out metal, clean wood is pulled out to be burned and that he has a burn permit from Wayne Township in Green County Pennsylvania to burn clean wood. EPA Inspectors asked to view the permit and Mr. Chisler stated he would provide the burn permit via email; however, as of this report he has not done so. Mr. Chisler stated that historically the burning of clean wood occurred out in the open on the ground; however, during an inspection in 2023 a PADEP inspector stated he could not burn on the open ground, and it needed to be containerized. Following that inspection Mr. Chisler had a third party fabricate a large container for the Facility to use to burn waste in. EPA inspectors ask Mr. Chisler to explain the incident involving the burning of “Pit Liner” on March 20, 2023. Mr. Chisler stated that prior to 2020 a company in New York would purchase used Pit Liner that was used to line ponds at Marcellus Shale oil and gas sites. He stated that during Covid the company stopped purchasing the liner but asked him to stockpile it for purchase at a later date. At around 10:00 AM on March 20, 2023, a new hire was using a grinder when some sparks flew onto the stockpile of Pit Liner causing it to ignite. Mr. Chisler stated that the fire burned until it was extinguished at about 2:00 PM. Following the incident, the Facility had the remainder of the Pit Liner shipped to the landfill and no longer accepts it.

The opening conference concluded at 10:25 AM.

III. Observations

EPA inspectors were led on a walkthrough of the Facility at 10:30 AM by Neil Chisler of CR&S. EPA inspectors noted photos would be taken during the walkthrough.

The inspection team began their walkthrough by exiting Mr. Chisler's office and headed west into the CR&S waste sorting and recycling storage area. A Caterpillar 930 and a Liebherr material handler were both observed in operation at the time on the walkthrough. One employee was actively sorting and removing metal from a roll-off box. The inspection team was then led along the western boundary of the facility where the waste burning tub was located along with numerous empty containers. Mr. Chisler was not actively burning at the time of the walkthrough. The inspection team observed numerous empty roll-off boxes and rear load containers staged along the southwest edge of the property that had been refurbished. Mr. Chisler stated he has approximately 60 roll-off boxes and 100 rear load containers. He stated that the roll-off boxes are sent off site for refurbishment by a third party and the small boxes are refurbished by his staff. EPA inspectors asked if any of the refurbishment on-site include abrasive blasting, welding, or painting. Mr. Chisler stated that no abrasive blasting occurs on site and only small spot welding occurs occasionally, and the only painting is done by hand with brushes and/or rollers. EPA inspectors were then led to the east. Immediately adjacent to the sorting area was the 500-gallon offroad diesel storage tank and adjacent to the south of the storage tank was the Ingersol light plant. EPA inspectors asked Mr. Chisler how long the light plant had been in its current location and Mr. Chisler stated it had been there for the past four years and is used during the wintertime to provide light in the evening to the unloading area. The light plant is powered by a 19.0 horsepower, 14.2-kilowatt Kohler engine. He stated that annual maintenance is performed including oil changes and greasing; however, he doesn't keep any records of it.

The observations concluded at 10:45 AM

IV. Closing Conference

After the observations, EPA inspectors and Neil Chisler had a brief closing conference to ask additional questions and discuss observations. The EPA inspectors noted that the investigation is ongoing, 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 60 days of the date of the inspection, with a copy going to both the State of West Virginia and Pennsylvania. The inspection concluded at 10:55 AM.

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 CR&S.

- The 19.0 horsepower, 14.2-kilowatt Kohler light plant has been located at the site in the same location for more than 12 consecutive months may no longer be a nonroad engine as defined by 40 CFR 1068.30 "Nonroad engine" and therefore be subject to the requirement listed in 40

CFR Part 63: Subpart ZZZZ – National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engine.

- Mr. Chisler stated that CR&S doesn't have an air permit and has never submitted a request for determination to either West Virginia or Pennsylvania.

DSB ID #: ECAD-5390

VI. List of Attachments

Attachment 1: Inspection Sign-in sheet

Attachment 2: Photo Log

Inspection Sign-In Sheet	
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Facility: Chissys Salvage & CS & R.

Date: 3/13/24

[illegible]



Photo Number: 001

Photo Description: Salvaged vehicle in the yard 10:06 AM



Photo Number: 002

Photo Description: 4000 gallons double walled diesel storage tank 10:13 AM



Photo Number: 003

Photo Description: CRS Truck in yard 10:29 AM

CR&S 03/12/2024



Photo Number: 004

Photo Description: CRS Truck engine 10:34 AM



Photo Number: 005

Photo Description: CRS Truck engine label 10:34 AM



Photo Number: 006

Photo Description: DEF tank on truck 10:37 AM



Photo Number: 007

Photo Description: Another CR&S owned truck in yard 11:21 AM



Photo Number: 008

Photo Description: Waste sorted and segregated in various containers 11:09 AM



Photo Number: 009

Photo Description: Waste burn container (tub) 9:33 AM



Photo Number: 010

Photo Description: Snap-On cutting tool 8:49 AM

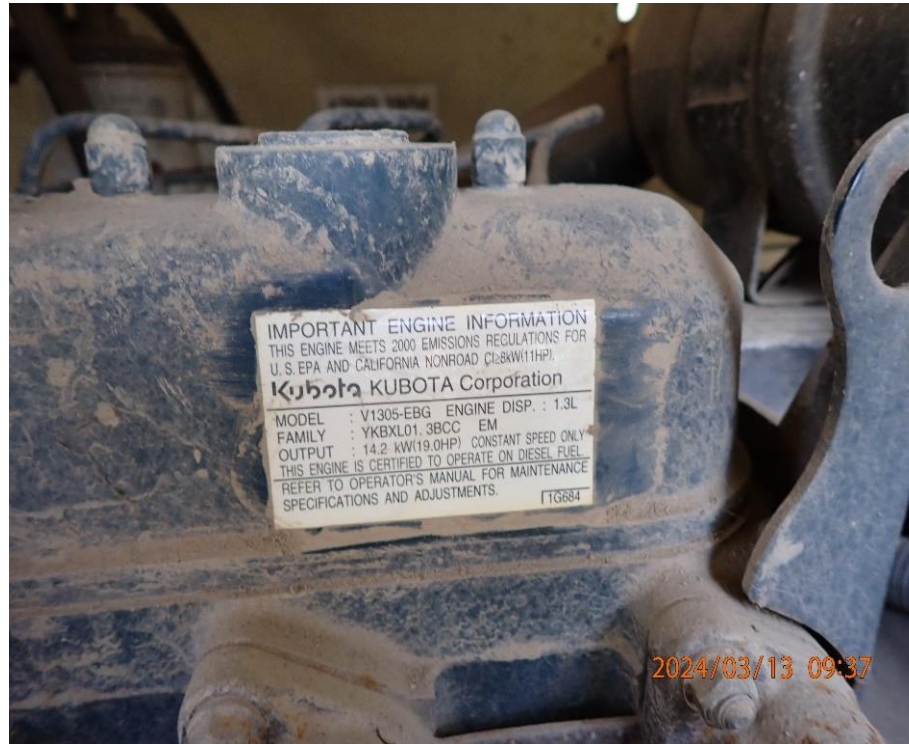


Photo Number: 011

Photo Description: Label on lighting plant engine 9:37 AM