



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

DATE: APR 05 2019

SUBJECT: CLEAN AIR ACT INSPECTION REPORT
ASW.Pengg, LLC, Bedford Heights, Ohio

FROM: David Sutlin, Environmental Engineer
AECAB (MN/OH)

THRU: Brian Dickens, Section Chief
AECAB (MN/OH)

TO: File

BASIC INFORMATION

Facility Name: ASW.Pengg, LLC

Facility Location: 26300 Miles Road, Bedford Heights, Ohio

Date of Inspection: February 5, 2019

EPA Inspector(s):

1. David Sutlin, Environmental Engineer
2. Gina Harrison, Environmental Scientist

Other Attendees

1. Charles White, R.G., EH&S Manager, ASW
2. Mike Howard, Operations Manager, ASW
3. Jeff Bokshom, Maintenance, ASW

Contact Email Address: cwhite@aswpengg.com

Purpose of Inspection: To determine compliance with ASW's operating permit and applicable federal regulations

Facility Type: Steel wire drawing

Regulations Central to Inspection: Ohio SIP

Arrival Time: 11:30 AM
Departure Time: 2:00 PM

Inspection Type:

- ☒ Unannounced Inspection
- ☐ Announced Inspection

OPENING CONFERENCE

- ☒ Credentials Presented
- ☒ CBI warning to facility provided

The following information was obtained verbally from Mr. White, Mr. Howard, or Mr. Bokshom unless otherwise noted.

Company Ownership: Pengg Austria GmbH purchased half of ASW in October 2016. Subsequently, the current owner is ASW.Pengg, LLC.

Process Description:

Raw materials consist of 5000 lb steel wire coils. The wire goes through a patenting process, in which it is continuously fed through a lead bath at 1600°F. It continues out of the bath and is slowly air-cooled to 800°F, which softens the wire before it is drawn through dies to elongate it.

The wire next goes through a tempering process in which it is heated to 1600°F and then quenched in mineral oil to rapidly cool it to below 200°F. It then passes through another lead bath, which heats the wire to 800°F for 4 to 24 hours, depending on the wire's diameter, and produces a martensite grain structure in the steel. The wire is then shipped to other facilities, which produce the final spring products.

In both patenting and tempering processes, the lead bath consists of a 50,000 lb capacity elongated pot, which is heated either by natural gas burners or electric induction. Lead is added to the pot in the form of 75lb pigs. Just as the lead starts to melt, a 4" layer of pea coke is added to cover the lead and suppress particulate emissions.

Staff Interview:

The pea coke layer's thickness is inspected daily by visually gauging the height of the exposed sidewall of the pot. The consistency of the pea coke is monitored weekly, and it is replaced approximately once per month. The spent pea coke is raked into a hopper and passed through a mesh where some of the lead falls through and can be reclaimed. The spent pea coke containing some oxidized lead is sent to one of two offsite third-party hazardous waste facilities.

The exhaust hoods on the tempering lines are centered over the mineral oil quenching process, which tends to produce the most emissions. The facility conducts quarterly lead monitoring of the indoor air. The last performance test was in 2015 for the T1 and T2 tempering furnaces. T1

has since been shut down and removed. The facility is currently constructing a new patenting line and new tempering line to process fine wire.

TOUR INFORMATION

EPA toured the facility: Yes

Data Collected and Observations:

At tempering line T3, fumes from the quenching process were observed escaping the exhaust hood. Mr. White stated that the emissions were from nitrogen introduced into the kettle to prevent oxygen from contacting the wire.

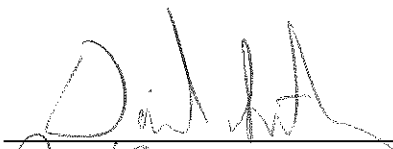
Photos and/or Videos: were taken during the inspection.

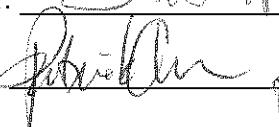
CLOSING CONFERENCE

Requested documents:

- Active air permits
- 2015 performance test report
- Annual emission calculations
- Indoor lead air monitoring results
- List of lead waste handlers used by the facility

SIGNATURES

Report Author:  Date: 4/5/19

Section Chief:  for Brian Dickens Date: 4/5/19

Facility Name: ASW.Pengg, LLC
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APPENDICES AND ATTACHMENTS

Appendix A: Digital Image Log

Facility Name: ASW.Pengg, LLC

Facility Location: 26300 Miles Road, Bedford Heights, Ohio

Date of Inspection: February 5, 2019

APPENDIX A: DIGITAL IMAGE LOG

1. Inspector Name: David Sutlin	2. Date(s) of Inspection: February 5, 2019
3. Company/Facility Name: ASW.Pengg, LLC	4. Street Address, City, State: 26300 Miles Road, Bedford Heights, Ohio
5. Number of Images: 4	6. Archival Record Location: Images are saved to a CD-R labeled "Contains CBI; ASWPENG, Bedford Heights, OH; 2/5/19 Inspection; Images"

Image Number	File Name	Date and Time (EST)	Description of Image
1	P2050012.JPG	2/5/2019 11:43	Patent line, P1
2	P2050013.JPG	2/5/2019 11:43	Patent line, P1
3	P2050014.MOV	2/5/2019 11:55	Tempering line, T3, quenching process
4	P2050015.JPG	2/5/2019 11:58	Cold kettle