United States Environmental Protection Agency
Region 7
Enforcement and Compliance Assurance Division

Air Branch

Air Branch Inspection Report
Unannounced Full Compliance Evaluation
Clay & Bailey Mfg. Co.
6401 E 40th St
Kansas City, MO 64129
FRS# : 110001449549

Inspection Date :
October 18, 2022

Christopher Appier, Inspector, ECAD, Air Branch

Appier, Christopher
Digitally signed by Appier, Christopher
Date: 2022.12.06 09:40:54 -06'00'

Authorized for Release by :

Tracey Casburn, Air Branch Chief, ECAD

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CONTENTS

TABLES

APPENDICES

INSPECTION OVERVIEW

INSPECTION OBJECTIVE

The objective of the full compliance evaluation (FCE) inspection was to determine compliance of the facility with the Clean Air Act. The inspection was part of the U.S. Environmental Protection Agency's (EPA) Creating Cleaner Air for Communities National Compliance Initiative.

Table 1 lists the inspection team members.

Table 1. PROJECT TEAM MEMBERS		
Team Member	**Organization**	**Project Role**
Christopher Appier	EPA, Region 7, ECAD, Air Branch	Lead Inspector
Sean Bergin	EPA, Region 7, ECAD, Air Branch	Inspector

FACILITY CONTACT INFORMATION

Table 2 lists the primary facility contacts.

Table 2. FACILITY CONTACT INFORMATION		
Name, Title	**Phone No.**	**Email Address**
Michael Brown, CFO	816-924-3900	mbrown@claybailey.com
Andy Borst, Plant Manager		aborst@claybailey.com
Blake Breckenridge, Operations Manager		bbreckenridge@claybailey.com

FACILITY OVERVIEW

Clay & Bailey Mfg. Co. operates under a Permit to Construct (Permit Number: 1372) issued on September 20, 2013, by the Kansas City Health Department. None of the New Source Performance Standards or National Emission Standards for Hazardous Air Pollutants apply to this facility. This facilities' emissions are below de minimis level. Since the Permit to Construct was issued, the facility has stopped handling gray iron at its foundry.

FACILITY OPERATIONS SUMMARY

Clay & Bailey Mfg. Co. operates a metal foundry, castings, machining and fabricating facility in Kansas City, Missouri. The installation primarily handles aluminum, but also has the ability to pour zinc. Process operations include melting, pouring, casting, green sand mold and core production, parts finishing, and parts coating. The facility produces tank accessories for aboveground and underground storage tanks used by the petroleum industry as well as construction castings for municipalities.

FIELD ACTIVITIES SUMMARY

I arrived at the facility on October 18, 2022, at 09:15 and completed a drive by surveillance inspection. I made entry at the front gate, introduced myself and members of the inspection team, presented my credentials, and provided my business card to Mr. Brown, Mr. Borst, and Mr. Breckenridge. I conducted an opening conference during which I explained that the purpose of the visit was to conduct an inspection to determine compliance with the Clean Air Act. I explained that after asking for some general business information, I would observe and photograph work practices, process units, emission units, control equipment and review associated records demonstrating compliance with the Permit to Construct. I explained to Mr. Brown that the facility could make a claim of business confidentiality and provided them with a Confidential Business Information form (Appendix A). Mr. Brown did not make a claim of confidentiality.

I was given a facility safety briefing and asked to wear safety glasses by Mr. Borst. I was given a facility tour by Mr. Brown, Mr. Borst, and Mr. Breckenridge. During the tour, I observed the equipment listed in the Permit to Construct, as well as equipment that was not listed.

I reviewed the operating status of the equipment and the records used to demonstrate compliance with the conditions in the facility's Permit to Construct. I asked questions and reviewed documentation necessary to determine the applicability of any relevant MACT area source regulations. I obtained copies of these records as indicated on the Receipt for Documents (Appendix B).

I conducted a closing conference with Mr. Brown, Mr. Borst, and Mr. Breckenridge. I provided the facility with copies of the U.S. Small Business Resources Information Sheet, the Confidential Business Information Notice, the facility's Permit to Construct, a Receipt for Documents, and an Environmental Assistance Fact Sheet.

INVESTIGATION OBSERVATIONS AND POTENTIAL FINDINGS

All photographs are attached as Appendix C. During the opening conference, Mr. Borst informed me that there were changes to the equipment listed in the Permit to Construct. Two tumblers have been installed at the facility since the Permit to Construct was obtained. Mr. Borst informed me that the facility had determined that it was not required to apply for a Permit to Construct for any of the new equipment. Mr. Borst provided me with records necessary to determine that a permit was not necessary. I asked Mr. Brown, Mr. Borst, and Mr. Breckenridge questions necessary to determine if there are any applicable area source MACT regulations. The facility does not melt any iron or steel. The facility does not use paints containing target hazardous area pollutants as defined in 40 C.F.R. Part 63 Subpart HHHHHH. The facility melts less than 600 tons of aluminum per year. The facility does not melt post-consumer zinc scrap as defined in 40 C.F.R. Part 63 Subpart TTTTTT. It appears that they are not subject to any area source MACTs. I discussed all observations with facility representatives during the closeout meeting.

These observations are not final compliance determinations. The EPA Region 7 Air Branch case review team will make the final compliance determinations based on its review of this report and other technical, regulatory, and facility information.

I did not observe any potential findings at the time of the inspection.