



REGION 3

PHILADELPHIA, PA 19103

Report Title: Clean Air Act Inspection of American Stripping Company
Inspection Date(s): 11/14/2023
Regulatory Program(s): NESHAP

Company Name: American Stripping Company
Facility Name: American Stripping Company
Facility Location: 5736 Sellger Drive

Norfolk, Virginia 23502

Latitude: 36.83871 **Longitude:** -36.20793

County/Parish: Norfolk

AFS/ICIS-Air Number: VA0000005171000272

Permit Number: 61365

NAICS Code: 238320 **SIC:** 3479

Unique Project #: 3E23CA30A

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I. Introduction

The United States Environmental Protection Agency (EPA) conducted a Clean Air Act (CAA) inspection at American Stripping Company (ASCO or Facility) to verify compliance with applicable State and Federal regulations. The Virginia Department of Environmental Quality (VADEQ) was notified of the inspection on October 30, 2023, via email. On November 9, 2023, EPA notified the Facility of the planned inspection via phone and email. EPA emailed a list of records for review to Todd Randall, prior to the inspection (see Attachment 1). These records are listed in the Records Review section of the report.

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 after, 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 5736 Sellger Drive, Norfolk, Virginia 23502. ASCO offers abrasive blasting and surface coating services. ASCO primarily operates as a surface coater that performs subcontracting services for the Department of Defense (DOD). However, ASCO does perform surface coating jobs for private citizens and companies. ASCO is privately owned and operated.

The Facility received a Synthetic Minor Operating Permit No. 61365 (Permit) from VADEQ issued on May 9, 2018.

ASCO is classified as Synthetic Minor for volatile organic compounds (VOC). The Facility is subject, or potentially subject, to the following federal regulations:

- 40 CFR Part 63, Subpart XXXXXX—National Emission Standards for Hazardous Air Pollutants Area Source Standards for Nine Metal Fabrication and Finishing Source Categories (Subpart 6X)
- 40 CFR Part 63, Subpart HHHHHH—National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources (Subpart 6H)

B. Inspection Opening Conference

At 8:35 AM on November 14, 2023, EPA inspectors arrived at the Facility for a CAA Inspection and conducted a brief opening conference. ASCO was represented by Todd Randall, President, and Joe Beard, Quality Assurance Manager. Also, Collin Blalock, of VADEQ, was present. EPA inspectors, Paul Arnold and Alex Everhart, presented their credentials and explained the purpose of the visit was to conduct a CAA inspection to determine compliance with their permit and any applicable regulations.

Additionally, EPA informed the facility representatives of their right to claim any confidential business information (CBI). At that time, Todd Randall did not claim any photos or documentation as CBI.

II. Site Activity/Process Description

ASCO has been operating at the Sellger Drive location for about 10 years. ASCO is sited on about three acres and has six buildings that have a combined 28,000 square feet under roof. ASCO has about twenty-one employees. ASCO offers abrasive blasting and surface coating services. ASCO has a total of four abrasive blasting booths and six paint booths. Two of the six paint booths are powder coating booths. ASCO has two natural gas-fired curing ovens, both are associated with the powder coating booths, and both are rated at 900 MBtu. ASCO has one, 950 MBtu, natural gas-fired burn off oven. The burn off oven is used to remove, or burn off, the accumulation of paint from metal hangers that are used when applying the surface coatings to products. ASCO does not perform metal fabrication and does only “limited amounts of maintenance welding”. Mr. Randall stated that ASCO was operating at about 40% of facility capacity at the time of EPA’s site visit. ASCO has no boilers and no emergency generators onsite. ASCO operates Monday through Friday, from 8 AM to 5 PM. ASCO is privately owned and operated.

Generally, items that are received for surface coating are initially deposited in an outdoor staging area (Photo 1), where they are held until they can be moved to either a paint spray booth, or a powder coat booth. If the item(s) require abrasive blasting, they are first taken to one of the four blast booths for blasting. After surface blasting occurs, the item(s) are taken to either, a paint booth, or a powder coat booth (Photo 7). If an item is coated with paint in one of the paint booths, it is allowed to air dry. If an item is powder coated in one of the two powder coat booths, it requires the additional step of being placed in one of the two powder coat ovens to properly complete the powder coat curing process. The powder coat ovens operate at 450° fahrenheit. After an item has been coated and allowed to dry, it is stored inside Building 2 (Photo 11), where finished products are stored prior to pick up or shipping.

All blast booths exhausts are vented through dedicated Donaldson Torit Dust Collectors. All surface coating booths are equipped with exhaust filters. All blast booths and coating booths are equipped with pressure drop gauges (Photos 2, 3, 6, 8, 9 & 10).

Mr. Randall stated that, in early 2023, ASCO installed a 20’ x 40’ blast booth. Mr. Randall stated that the 20’ x 40’ blast booth and dedicated baghouse were both initially intended to be temporary and were needed to accommodate large metal objects from a recent DOD subcontract. The 20’ x 40’ blast booth (Photo 5) and dedicated baghouse (Photo 4) were both installed, and operated, without a Stationary Source Permit to Construct from VADEQ.

Occasionally, ASCO receives metal objects that require minor welding maintenance, or repair. In those situations, ACS performs the welding required, but Mr. Randall stated that ASCO does not regularly perform welding. ASCO has one Millermatic 210 MIG Welder onsite.

The opening conference concluded at 9:10 AM.

III. Observations

EPA inspectors were led on a walkthrough of the Facility at 9:15 AM by Todd Randall and Joe Beard of ASCO and Collin Blalock of VADEQ also present for the walkthrough. EPA inspectors noted photos would be taken during the Facility walkthrough (Attachment 2).

EPA observed the outdoor product staging area before proceeding to Building 6, which has three blast booths. None of the three blast booths were actively blasting at the time of the walkthrough. All blast booths vented to dust collectors and exhausted, via stacks, through the roof. After exiting Building 6, EPA noticed a large blast booth (about 20' x 40') that was not inside any building. At that time Mr. Randall stated the 20' x 40' blast booth was installed earlier in the year and that it was not listed in the permit and that ASCO has not obtained a permit to install, or operate, the large blast booth. EPA observed a dedicated baghouse used to control particulate matter emissions from the large blast booth. The baghouse was manufactured by Empire. The 20 x 40' blast booth was not operating during EPA's walkthrough.

Next, EPA observed the paint booths inside both Building 4 (one paint booth) and Building 3 (two paint booths). All paint booths had filters installed and all vented, via stacks, through the roof. Neither Building 4, nor Building 3, were actively conducting surface coating operations during EPA's walkthrough. EPA entered Building 1, which had two power coat booths. One powder coat booth was in use during EPA's walkthrough. Building 1 also houses two powder coat curing ovens. Both curing ovens are natural gas-fired, and both are rated at 900 MBtu. However, ASCO's Permit had both ovens rated at 200 MBtu. One curing oven was operating at a temperature of 450° F during EPA's walkthrough.

Building 5 contains the burn off oven. It was not operating during the walkthrough and was observed as having a rating of 950 MBtu. However, ASCO's Permit had the burn off oven rated at 350 MBtu.

Building 2 is used, by ASCO, to house finished products that await customer pickup or offsite shipping. EPA's walkthrough concluded after observing Building 2.

The walkthrough concluded at 10:20 AM.

IV. Records Review

The records review commenced immediately after the plant walkthrough at 10:20 AM. EPA inspectors reviewed documents requested in the November 9, 2023, email to Todd Randall (see Attachment 1). Records were provided at the time of the inspection by Todd Randall. Below are the records requested and what was provided:

EPA reviewed the following records.

- Welding wire usage
 - From 2020-2023, ASCO purchased about 60 pounds of wire, per year.
- Spray Booth filter purchase records
 - From 2019 to October 2023, ASCO purchased replacement spray booth filters that were consistent with manufacture's recommendations.
- Visible Emissions (VE) logs
 - From January 2019 through October 2023, ASCO maintained VE logs for all spray booths and blast booths listed in the permit.
- Pressure Drop Gauge logs.
 - From January 2019 through October 2023, ASCO maintained pressure drop logs for all spray booths and blast booths listed in the permit. ASCO's Permit has no federally enforceable pressure drop operating range.
- Blast material usage.
 - From January 2019 through December 2022, ASCO's reported annual blasting media usage in blast booth 001BR was below the annual permit limit of 312 tons per year. See Table 1.
- VOC content of coating materials.
 - ASCO provided a list of applied coating materials. None of the listed materials exceeded the permit limits of 3.5 lbs VOC/gal coating or 4.3 lbs VOC/gal for clear coatings.
- Annual VOC emissions
 - From January 2019 through December 2022, ASCO reported annual VOC emissions below the annual VOC permit limit of 7 tons/year. See Table 1.

TABLE 1		
	VOC (tons per year)	Blast Media (tons/year)
<i>Permit Limit</i>	<i>7</i>	<i>312</i>
2022	1.25	212
2021	1.53	206
2020	1.64	239
2019	1.55	211

V. Closing Conference

After the records review, EPA inspectors, Todd Randall, Joe Beard and Collin Blalock had a brief closing conference to ask additional questions and discuss observations. The EPA inspectors noted that the investigation is on-going, 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 in 60 days, with a copy to the State. Simultaneously, EPA will perform a detailed review of records and may have additional questions. The inspection concluded at 1:45 PM.

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 American Stripping Company.

- In early 2023, ASCO installed, a large spray booth without applying for, or had been issued, a Stationary Source Permit to Construct from VADEQ.
- The three gas-fired ovens observed onsite, at ASCO, have BTU ratings that are greater than the listed BTU rating listed in Operating Permit 61365. If ASCO has been reporting emissions based on the lower BTU ratings listed in the Permit, ASCO will have to resubmit, to VADEQ, previously reported air emissions.
- Pending additional review of metal hazardous air pollutants (MHAP) information that ASCO must submit to EPA, ASCO may be subject to the provisions of 40 CFR Part 63, Subpart 6X.
- Pending additional review of MHAP information that ASCO must submit to EPA, ASCO may be subject to the provisions of 40 CFR Part 63, Subpart 6H.

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VI. List of Attachments

Attachment 1: Email correspondence to Todd Randall of records requested to review during inspection

Attachment 2: Photo Log