



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

SUBJECT: CLEAN AIR ACT INSPECTION REPORT
Indiana Pickling & Processing Company, Portage, Indiana

FROM: Brittany Cobb, Environmental Engineer
AECAB (MI/WI)

THRU: Sarah Marshall, Section Supervisor
AECAB (MI/WI)

TO: File

BASIC INFORMATION

Facility Name: Indiana Pickling & Processing Company

Facility Location: 6650 Nautical Dr Portage, Indiana

Date of Inspection: 6/9/2022

EPA Inspector(s):

1. Brittany Cobb, Environmental Engineer
2. Daniel Schaufelberger, Environmental Scientist

Other Attendees:

1. Thalia Hobson, Air Compliance Inspector – IDEM
2. Erik Alsman, Assistant Plant Manager - Indiana Pickling & Processing Co.
3. Jason Hudson, Plant Manager - Indiana Pickling & Processing Co.
4. Derek Logsdon, Wastewater Manager - Indiana Pickling & Processing Co.
5. Mike Hemp, Maintenance Manager - Indiana Pickling & Processing Co.
6. George Stephens, Maintenance Lead - Indiana Pickling & Processing Co.

Contact Email Address: jhudson@feralloy.com, ealsman@feralloy.com

Purpose of Inspection: To determine compliance with the Clean Air Act

Facility Type: Steel pickling facility

Regulations Central to Inspection: 40 CFR Part 63 Subpart CCC: National Emission Standards for Hazardous Air Pollutants for Steel Pickling (NESHAP Subpart CCC) and other applicable regulations and permits.

Arrival Time: 9:15 AM CT

Departure Time: 11:00 AM CT

Inspection Type:

- ☒ Unannounced Inspection
- ☐ Announced Inspection

OPENING CONFERENCE

- ☒ Presented Credentials
- ☒ Stated authority and purpose of inspection
- ☒ Provided Small Business Resource Information Sheet via email
- ☒ Provided CBI warning to facility

The following information was obtained verbally from Indiana Pickling & Processing Co. employees unless otherwise noted.

Process Description:

Indiana Pickling & Processing Co. (Indiana Pickling or facility) performs pickling on steel coils with hydrochloric acid (HCl). The steel is uncoiled, cleaned with a steel brush and transferred to the push/pull steel pickling line. The pickling line consists of four (4) enclosed HCl baths fed from four (4) enclosed storage tanks, which contain 18% concentrated HCl. There is also a 20,000-gallon tank for waste HCl. HCl emissions from the pickling line are controlled by a wet scrubber and particulate emissions from the steel brush process are controlled by a baghouse.

Staff Interview:

Indiana Pickling was originally constructed in 1991. The facility operates up to 24 hours per day, 7 days per week. Currently the facility is operating 5 or 6 days per week because of low demand. There are approximately 53 employees.

Indiana Pickling monitors the temperature of the baths once per hour and maintains the temperature at approximately 180° F. There are two 11.7 MMBtu/hr boilers on site to heat the tanks. Indiana Pickling relines the tanks, on average, once every two years. In the last few years, the facility has increased their steel pickling production rate to 723,000 tons per year and 103 tons per hour and simultaneously decreased their HCl usage from 5 gallons of HCl utilized per ton of steel to 3.5 gallons per ton of steel. Indiana Pickling performs a scrubber stack performance test every 5 years; the most recent was in 2021. The HCl emission rate from that test was 0.0082 lbs of HCl per hour. The facility measures the scrubber pressure drop and water flow rate once per day and performs daily and quarterly preventative maintenance/inspections of the scrubber.

TOUR INFORMATION

EPA Tour of the Facility: Yes

Data Collected and Observations:

EPA was led on a tour by Erik Alsman and Jason Hudson. EPA observed the differential pressure for the baghouse to be 3.4 inches of water column and the wet scrubber to be 6.5 inches of water column. The flow rate for the scrubber was 6 gallons per minute.

Photos and/or Videos: were not taken during the inspection.

Field Measurements: were not taken during this inspection.

RECORDS REVIEW

1. Scrubber water flow

CLOSING CONFERENCE

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

Requested documents:

- Previous 2 performance tests
- 2018 – 2021 emission calculations
- Production data
- Records of scrubber preventative maintenance

DIGITAL SIGNATURES

Report Author: Brittany Cobb Digitally signed by
Brittany Cobb
Date: 2022.07.21
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Section Supervisor: SARAH MARSHALL Digitally signed by
SARAH MARSHALL
Date: 2022.07.22
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