



# Clean Air Act Compliance Inspection Report

United States Environmental Protection Agency  
Region 10 – Seattle, WA

## *Full Compliance Evaluation*

### **Cascade Steel Rolling Mills, Inc. McMinnville, Oregon**

**Inspection Dates: February 23-24, 2021**

**JON KLEMESRUD**

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Report Author Signature

Date

Jon Klemesrud  
Inspector  
EPA Region 10

**ZACHARY HEDGPETH**

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Peer Review Signature

Date

Zach Hedgpeth, PE  
Environmental Engineer  
EPA Region 10

**KATHERINE MCCLINTOCK**

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Date

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|-------|-----------------------------------------------------------|----|
| -     | <b>Contents</b>                                           |    |
| I.    | Facility Information .....                                | 3  |
| II.   | Inspection Information.....                               | 4  |
| III.  | Facility Background.....                                  | 4  |
| IV.   | Inspection Chronology.....                                | 5  |
| V.    | Opening Conference .....                                  | 6  |
| VI.   | Site Review .....                                         | 6  |
| VII.  | Records/Permit Conditions Review.....                     | 9  |
| VIII. | Potential Compliance Concerns.....                        | 11 |
|       | A. Wheel Weights Observed in Scrap Storage Area .....     | 11 |
|       | B. Frequency of Maintenance Required for Baghouse 1 ..... | 12 |
|       | C. Operation and Maintenance of Baghouse 1A Bags .....    | 13 |
| IX.   | Closing Conference.....                                   | 13 |

ATTACHMENT A – Aerial Image (Google Earth)

ATTACHMENT B – Title V Permit #36-5034-TV-01

ATTACHMENT C – Permit Review Report

ATTACHMENT D – Pre-Enforcement Notice - 2020-PEN-5618

ATTACHMENT E – Photograph Log

## I. Facility Information

|                      |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
|----------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Facility Name:       | Cascade Steel Rolling Mills, Inc. (CSRM)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| Facility Owner:      | Schnitzer Steel Industries, Inc.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| Facility Address:    | 32000 N Highway 99W<br>McMinnville, Oregon 97128                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| Mailing Address:     | P.O. Box 687<br>McMinnville, Oregon 97128                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| Facility Contact(s): | <p>Daniel Lee - Director, Environmental Engineering<br/>Schnitzer Steel Industries, Inc.<br/>(503) 434-3324, <a href="mailto:dlee@schn.com">dlee@schn.com</a></p> <p>Tim Sturdavant – Environmental Operations Director<br/>Schnitzer Steel Industries, Inc.<br/>(801) 317-7626, <a href="mailto:tsturdavant@schn.com">tsturdavant@schn.com</a></p> <p>Matt Ruckwardt – VP/COO/CFO, CSS Business<br/>Schnitzer Steel Industries, Inc.<br/>(503) 323-2814, <a href="mailto:mruckwardt@schn.com">mruckwardt@schn.com</a></p> <p>Andres Wollmann – GM of Operations, CSRM<br/>Schnitzer Steel Industries, Inc.</p> <p>Tori Syverson – Regional Safety Manager, CSRM<br/>Schnitzer Steel Industries, Inc.</p> |
| Latitude/Longitude:  | N 45. 22863 W -123. 15905                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| NAICS Code(s):       | 331111 – (Iron and Steel Mills)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| AFS/FRS Number:      | OR0000004107105034                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| Permit Number:       | Title V, 36-5034-TV-01<br>Issued 04/01/2020; Expires 04/01/2025                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |

### Disclaimer:

Unless otherwise noted, all details in this inspection report were obtained from conversations with Daniel Lee, Tim Sturdavant, Andres Wollmann, Matt Ruckwardt or from observations made during the inspection and/or file review. The report is a summary of observations and information gathered, it does not constitute a final decision regarding compliance with the Clean Air Act (CAA) and applicable regulations or permits.

## II. Inspection Information

Inspection Date(s): February 23-24, 2021

EPA Inspector(s): Jon Klemesrud, Inspector  
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Oregon Department of Environmental Quality  
Western Region – Salem Office  
(503) 378-5070 [eisele.michael@state.or.us](mailto:eisele.michael@state.or.us)

Inspection Start/End Times: Day 1, 9:00 – 16:00  
Day 2, 9:00 – 12:45

Inspection Notice: Announced

This was a full compliance evaluation (FCE) by the Environmental Protection Agency Region 10 (EPA R10) and the Oregon Department of Environmental Quality (ODEQ) to determine the facility's compliance with the issued Title V operating permit and regulations under the Clean Air Act (CAA).

## III. Facility Background

Cascade Steel Rolling Mills, Inc (CSRM) is owned and operated by Schnitzer Steel Industries, Inc (SSI). The facility processes ferrous scrap metal to produce various steel products, such as reinforcing bar (rebar), coiled rebar, wire rod and other specialty products. Current staffing at CSRM is approximately 400 employees. The facility is located in the northeastern edge of McMinnville, Oregon, an aerial image is attached to this report (**Attachment A**) for a general footprint and location.

CSRM was founded in 1968 and was acquired by SSI in 1984. The facility's main components include scrap metal receiving and storage, a melt shop, a rod and bar mill, product storage and supporting operations.

The facility operates under State-issued Oregon Title V Permit #36-5034-TV-01 (**Attachment B**). The permit was reissued on April 1, 2020 with a current expiration date of April 1, 2025.

Steel production at CSRM consists of the following processes:

1. receiving and storing scrap metal
2. melting scrap metal in an electric arc furnace (EAF) and removing impurities
3. adjusting the molten metal chemistry in the ladle furnace
4. pouring the molten metal into a continuous caster to form billets
5. reheating the billets and rolling them into the various metal products

There are nine emission units (EUs) listed within the current permit including: Melt Shop Baghouses (EU-1), Melt Shop Baghouse Dust Handling (EU-2), Melt Shop Roof (EU-3), Melt Shop Vertical Preheater (EU-4), Melt Shop Slag Handling (EU-5), Rod Bar and Mill (EU-7), Scrap Yard (EU-9), Billet Cutting (EU-10) and Unpaved Roads (EU-11).

A more detailed process and emission unit description can be found in the facility's Permit Review Report (**Attachment C**) associated with the Title V permit.

There are currently no major source National Emission Standard for Hazardous Air Pollutants (NESHAP) standards applicable to CSRM as the facility is not a major source of hazardous air pollutants (HAP). The facility is subject to federal requirements under the area source NESHAP standards for Electric Arc Furnace Steelmaking Facilities (40 CFR Part 63 Subpart YYYYYY) and Reciprocation Internal Combustion Engines (RICE) (40 CFR Part 63 Subpart ZZZZ), as well as the New Source Performance Standards (NSPS) for the electric arc furnaces (Subpart AAa). Applicable State requirements include Chapter 340 of the Oregon Administrative Rules (OAR) for emission limits and compliance assurance monitoring, recordkeeping, and reporting.

The most recent source testing at the facility had occurred in May of 2016.

The facility was last inspected by ODEQ on August 23, 2018. The inspection report stated that the facility was in compliance with the terms and conditions of the permit at the time of review.

In 2020, the facility was issued a pre-enforcement notice by ODEQ (**Attachment D**) based on two Class I violations that were reported under their Title V permit during the spring of 2020.

#### IV. Inspection Chronology

This inspection of CSRM was originally announced and scheduled to occur on December 01, 2020. The inspection was postponed indefinitely due to the COVID-19 pandemic and eventually rescheduled to February 2021. On February 16, 2021, I contacted CSRM Environmental Engineering Director Daniel Lee to announce the inspection. We discussed that Zach Hedgpeth (EPA) and I would be conducting a routine full compliance evaluation (FCE) inspection for coverage under their Title V permit. I informed Mr. Lee that we would be joined on the inspection by Oregon

Department of Environmental Quality (ODEQ) representative Michael Eisele. We agreed on the February 23, 2021 inspection start date.

Upon arriving to the facility, the inspection team checked in with security at the front desk. We presented our credentials and reviewed the facility's mandatory safety booklet. Mr. Lee met us at the security desk and escorted us to a conference room to begin the inspection. The inspection included an opening conference, a facility walk-through, a records review, and a closing conference.

For the facility walk-through, we observed the general facility operations, process flow, and toured each emission unit (EU) and monitoring areas associated with the Title V Permit. We were allowed to inspect all areas requested. The facility-walk through occurred over the course of two days (Day 1 and Day 2) as discussed in this inspection report.

The records review and closing conference occurred within the facility's conference room following the walk-through on Day 2. During the closing conference, the inspection team discussed our observations from the walk-through and from the initial records review. Portions of the record review occurred after the inspection in an attempt to limit on-site interaction due to the ongoing COVID-19 pandemic.

## **V. Opening Conference**

The opening conference was held in one of the facility's larger conference rooms. In addition to the inspection team and Mr. Lee, we were also joined by facility representatives Andres Wollman, Matt Ruckwardt, Tim Sturdavant and Tori Syverson. We had our initial introductions, exchanged business cards and presented our EPA inspector credentials to the group. I explained that I would be leading the inspection for on-the-job training (OJT) associated with the EPA's CAA training requirements, with Zach Hedgpeth assisting as a senior EPA CAA credentialed inspector.

I discussed the purpose and expectations of the inspection and provided Mr. Lee with a copy of the EPA Small Business Resource Information Sheet as well as EPA's Confidential Business Information (CBI) Notice Forms. We discussed the EPA forms and also how photographs would be taken during the site walk-through. It was agreed that Mr. Lee would take side-by-side photos on the facility's behalf.

## **VI. Site Review**

Following the opening conference, Matt Ruckwardt (VP/COO & CFO) conducted a short PowerPoint presentation for the inspection team on the facility history and general operations. At the conclusion of the presentation and brief discussion, Tori Syverson (Regional Safety Manager) provided a safety briefing prior to us leaving the conference room to begin the walk-through. For the entire walk-through, we were joined by Mr. Lee and Mr. Sturdavant. Mr. Wollmann was present for the morning walk-through on Day 1.

The walk-through began at approximately 10:50am on Day 1. The photographs used in this inspection report and a complete photo log appears in **Attachment E**.

At the time of the walk-through, the facility was in full operation for rebar production. According to the facility, the melt shop typically runs 4/days a week on average. The rolling mill is in continuous operation 7/days a week with approximately 8-hours per week of shutdown for cleaning and maintenance.

We first observed the scrap metal handling area (**Photo 1**) associated with the melt shop. According to the facility, 85% of scrap metal used in the mill is sourced internally by SSI and the facility is served by both truck and rail. At the scrap handling area, two cranes unload scrap from rail to the main scrap piles southeast of the melt shop. The piles are also fed by on-site dump trucks that transfer scrap from the incoming receiving/trucking area east of the administration office building. From the scrap handling area, scrap is brought into the adjacent melt shop.

Emissions from the melt shop activities are primarily captured by three baghouses [Melt-Shop Baghouses (EU-1)] which include: BH-1, BH-1A and BH-2. Prior to entering the melt shop to observe the EAF, we viewed the baghouse lines and upper roof canopy (**Photo 2**).

BH-1 is a mechanical-shaker baghouse with 12 compartments and operates using three separate 800 horsepower fans, BH-1A and BH-2 are reverse air baghouses (**Photo 3 & Photo 4**).

Once inside the melt shop, we observed the EAF in operation from the control room (**Photo 5**). Charge buckets deposit scrap from the scrap yard into the EAF. According to the Permit Review Report, oxygen is added directly to the melt for oxygen lacing and limerock. Coke and coal are also added to arrive at the correct metallurgical properties in the melt. The EAF is operated by three electrodes.

Emissions generated within the EAF are pulled directly from the “4<sup>th</sup> hole” of the EAF cover (aka direct shell evacuation system) (**Photo 6**), through a heat exchanger, and conveyed to baghouses BH-1 and BH-1A. The “4<sup>th</sup> hole” is the primary capture exhaust system on the EAF. (**Photo 7**). Emissions generated during the charging and tapping activities at the EAF are released inside the melt shop and are designed to be captured by an overhead canopy that is vented to BH-1 and BH-1A.

A barrier wall (**Photo 8**) and secondary canopy is designed to block and capture additional emissions that might escape the primary canopy. Emissions collected via the secondary canopy are conveyed to BH-2. According to Mr. Lee, the barrier wall, secondary canopy and BH-2 were installed approximately in the early 2000’s.

Per compliance with the permit, fan motor amperes and damper position is monitored on a once-per-shift basis. Real time data is displayed within the control room.

Particulate matter collected from the baghouses [Melt Shop Baghouse Dust Handling (EU-2)] are transferred to a dust hopper and then emptied via an enclosed screw conveyor to a railcar stationed in an enclosed building. The air from the railcar is evacuated back to BH-1. According to Mr. Lee, a rail car is filled and sent to “Zinc National” every 2-3 days, while the spent teflon lined polyester bags used in the baghouses are exclusively sent to US Ecology for disposal as of 2021.

According to the Permit Review Report, during the melting of the scrap in the EAF, nonferrous scrap constituents float to the top of the EAF vessel and are decanted off into a slag pit [Melt Shop Slag Handling (EU-5)]. Slag is removed from the pit with a front-end loader by contractor Tube City IMS (TCIMS). TCIMS operates their own slag crushing and screening plant onsite. TCIMS operates their plant under its own separate ODEQ Air Contaminant Discharge Permit.

Following our observations of the EAF and collection system, we continued to the northwest end of the melt shop to view the next stage in the process, the ladle furnace and tundish used in billet casting (**Photo 9**).

During the continuous casting, emissions from the ladle furnace and ladle heater are collected and vented through BH-1 and BH-1A. Fugitive emissions during the ladle transfer and casting process are emitted through the roof monitors [Melt Shop Roof (EU-3)]. There are no emission controls serving the roof monitors. Some visible emissions were observed within the casting area inside the melt shop at the time of the inspection. Weekly visible emission observations (EPA Method 9) are required for EU-3 per the permit. The limit is a six-minute block average of 20% opacity.

The Melt Shop Vertical Preheater (EU-4) provides additional heating of the ladle furnace and tundish. According to the Permit Review Report, the preheater is fueled by natural gas and vents to a stack on the melt shop roof.

Once poured into molds, billets are cut into sections (**Photo 10**) via natural gas torches [Billet Cutting (EU-10)]. The sections are cooled with water, and then stored in the billet storage yard or transferred directly to the rod and bar rolling mill for processing. Near the billet storage area, we observed a large divider/barrier netting material (**Photo 11**). According to Mr. Lee this barrier wall was installed in 2019 to address a complaint from a neighboring nursery business located approximately 100 feet north of the billet storage area.

We toured the Rod and Bar Mill (EU-7) (**Photo 12**) which consists of the reheat furnace, mill, cooling bed, and rod block. At this location the metal billets are reheated using ultra-low NO<sub>x</sub> burners equipped with flue gas recirculation (FGR) to control emissions. The billets are then rolled into the final products, cooled, and then cut and/or coiled depending on the product.

We viewed the final product storage area and then broke for a brief lunch at approximately 1:10pm. We regrouped at approximately 2:00pm and visited the visible

emissions (VE) monitoring locations (**Photo 13 & Photo 14**).

According to Mr. Lee, CSRM has approximately 10 staff certified to perform the daily EPA Method 9 readings required for permit compliance. Method 9 readings were not taken by facility staff nor the inspection team at the time of inspection. No visible emissions were observed during our walk-through of the facility operations. One instance of visible emissions was observed post inspection, while exiting the facility near the main office building. It appeared the visible emissions were coming from above the Melt Shop.

In addition to the monitoring locations, we visited the baghouse control area and railcar enclosure as part of the facility walk-through. The baghouse/railcar area was observed to be clean and the capture system/conveyor appeared to be operating properly.

We then toured the scrap storage area (**Photo 15**), slag handling area (**Photo 16**), stockpile areas (**Photo 17**), and billet storage areas (**Photo 18**). According to Mr. Lee the facility has an on-site sweeper that is on a continuous schedule where the majority of areas are swept four days per week. The facility uses a water truck as needed to water down dust from unpaved roads. We also returned to the melt shop to revisit the operation of the ladle furnace. Our Day 1 walk-through concluded at approximately 3:50pm.

We began the Day 2 at 9:00am, our walk-through included visiting the facility's emergency generator (**Photo 19**) and fueling area (**Photo 20**) for compliance with the Reciprocating Internal Combustion Engine (RICE) NESHAP and Federal Gasoline Dispensing Facility NESHAP requirements. The facility's emergency generator was manufactured by Caterpillar®, the meter read 433.6 hours. Monthly maintenance is recorded on a log sheet posted within the compartment door (**Photo 21**) and was last marked completed on February 11, 2021.

We returned to the conference room at approximately 9:55am to go through requested records.

## VII. Records/Permit Condition Review

Following our walk-through on Day 2, the inspection team reviewed permit related records that were requested to be available. The requested date range was October 2018–February 2021 and requests were numbered 1-21:

1. Fugitive Emissions Surveys and Corrective Actions Taken (Permit Citation 5.c.i): Records provided were complete. The facility conducts weekly surveys from four separate perimeter locations: Yard Office, Vineyard, Kraemers Nursery, Scale Ponds.
2. Paved Area Cleanings and/or Treatment Log (Permit Citation 5.c.ii): Records provided were complete. The facility has a sweeping schedule/plan, areas are

broken up into five areas (A-E), each area is swept four days a week.

3. Spillage Cleanup Log (Permit Citation 5.c.iii): Records provided were complete.
4. Nuisance Complaint Log (Permit Citation 8): Records provided were complete. The facility maintains a log of nuisance complaints with the permit required documentation. The facility has documented 22 complaints since the last inspection. The complaints have all come from a neighboring plant nursery business (Kreamer's Garden) which is located approximately 100 feet west of the billet storage area. The complaints occurred within a date range of 02/08/2019 – 10/16/2020. Each complaint had a documented action and response, including the installation of a large WeatherSolve® structure/netting to assist in controlling fugitive emissions.
5. Visible Emission Survey Records for Melt Shop Baghouses (EU-1) (Permit Citation 11.c): Survey/opacity readings (EPA Method 9) are conducted during each day when the furnace is operating for the EU-1 baghouses. Records were provided and selected at random for review. Reviewed records were complete, no opacity exceedances were documented in the surveys reviewed.
6. Source Test Results/Data for EU-1 (Permit Citation 15.d, 18.b, 20.b): The most recent Source Test had occurred on May 17-19, 2016 by Horizon Engineering LLC. The Source Evaluation Report was provided and partially reviewed post-inspection.
7. EU-1 Fan Motor Amperes and Damper Positions (Permit Citation 16.a.iii): Records were provided and were reviewed post-inspection. Fan motor amperes and damper positions are recorded on a once-per-shift basis.
8. EU-1 Capture System Inspections and Maintenance Performed (Permit Citation 16.b.i): Records were provided and were reviewed post-inspection. Capture system inspections and maintenance are performed and documented by CSRM contractors.
9. Deviations of Pressure Drop Action Levels for BH-1, BH-1A, BH-2 (Permit Citation 16.v.c.iv): Records provided were complete, this data is also provided in the semi-annual and annual reports that are submitted by CSRM.
10. Inspections and Maintenance Performed on Baghouse or Bags (BH-1, BH-1A, BH-2) (Permit Citation 16.d.i., 16.e): Records provided were reviewed post-inspection and were complete. Inspections and maintenance are completed by CSRM contractors. Some baghouse bags were still being sent to the EAF as late as 11/25/20. According to Mr. Lee, CSRM has since changed their policy and now all baghouse bags are being sent to a hazardous waste landfill.
11. Visible Emission Records for Melt Shop Roof (EU-3) (Permit Citation 24.d):

Records were provided and complete. Records were provided for each survey and selected at random for review. No opacity exceedances were documented in the surveys reviewed.

12. Source Test Results/Data for EU-3 (Permit Citation 26.b): The most recent Source Test occurred on May 17-19, 2016 by Horizon Engineering LLC. The Source Evaluation Report was provided and partially reviewed post-inspection.
13. Fuel Records for Vertical Preheater (EU-4) and Reheat Furnace (EU-7) (Permit Citation 30. and 34.): Records provided were complete.
14. Visible Emission Records for Vertical Preheater (EU-4) and Reheat Furnace (EU-7) (Permit Citation 28.a. and 32.a): Records provided were complete.
15. Source Test Results/Data for Reheat Furnace (EU-7) (Permit Citation 35.b): The most recent Source Test occurred on May 17-19, 2016 by Horizon Engineering LLC. The Source Evaluation Report was provided and partially reviewed post-inspection.
16. Visible Emission Records for Billet Cutting (EU-10) (Permit Citation 37.e.): Records provided were complete.
17. Source Test Results/Data for Billet Cutting (EU-10) (Permit Citation 39.b): The most recent Source Test occurred on May 17-19, 2016 by Horizon Engineering LLC. The Source Evaluation Report was provided and partially reviewed post-inspection.
18. 2019 Annual Report (Permit Citation 57): The 2019 Annual Report was provided and reviewed. The report was submitted on March 10, 2020.
19. 2019 and 2020 Semi-Annual Reports (Permit Citation 56., 57. (Part 2 of 2) 6.a. and 6.b.): The 2019 and 2020 semi-annual reports were provided and reviewed. The 2019 semi-annual report was submitted on August 9, 2019, the 2020 semi-annual report was submitted on August 14, 2020.
20. Emergency Generator Operations Log (Permit Citation 40.e.vi., 40.e.vii.): The emergency generator operations log was provided and reviewed.
21. Pollution Prevention Plan (Permit Citation Part 2 of 2, 2.a., 5.a., 5.b.): The pollution prevention plan was provided and reviewed.

## **VIII. Potential Compliance Concerns**

Observations during the inspection and records review identified the following potential compliance concerns:

### **A. Wheel Weights Observed in the Scrap Storage Area**

Part 2 of 2 of the Title V Operating Permit includes provisions from the Electric Arc Furnace Steelmaking Facilities Area Source NESHAP (40 CFR part 63 subpart YYYYYY)

Condition 2 of Part 2 of 2: *Control of Chlorinated Plastics, Lead, and Free Organic Liquids* states: “For metallic scrap utilized in an EAF at the facility, the permittee must comply with the requirements in either Condition 2.a. or 2.b below. The permittee may have a certain scrap at the facility subject to Condition 2.a and other scrap subject to Condition 2.b. provided the scrap remains segregated until the charge make-up.”

Condition 2.a.i(1) states: “the permittee must operate according to the Pollution Prevention Plan submitted to DEQ on 6/20/08.”

Section I.B. of the facility’s Pollution Prevention Plan states that “Lead-containing components of scrap, such as batteries, battery cables, and wheel weights, must be removed, to the extent practicable, prior to charging in the furnace unless the scrap is used produce leaded steel.”

At the time of inspection, during our facility walk-through on Day 2, we observed 4 vehicle wheels (approx.) within the scrap storage area that contained wheel weights (**Photo 22**). The concern is that the wheel weights were not rejected/identified during receiving and had the potential to be charged in the furnace.

According to Mr. Lee, visual inspections of incoming scrap are being conducted to identify and reject such prohibited items. It is possible the items were near the bottom of the incoming load as were not identified. We discussed CSRM scrap inspection and corrective action procedures. Mr. Lee said he would address the issue with the appropriate staff.

During the time between the walk-through and the closing conference, CSRM staff inspected the scrap storage area. At the closing conference it was stated that 165 wheels were sorted from the scrap area and 12 weights were found and removed.

### **B. Frequency of Maintenance Required for Baghouse 1**

Condition 16.b of Part 1 of 2 of the Title V Operating Permit states: “the permittee must perform monthly operational status inspections of the equipment that is important to the performance of the total capture system (i.e., pressure sensors, dampers, and damper switches). This inspection must include observations of the physical appearance of the equipment (e.g., presence of holes in ductwork or hoods, flow constriction caused by dents or accumulated dust in ductwork, and fan erosion). Any deficiencies must be noted and proper maintenance performed. [40 CFR 60.274a(d)]

During the records review of the Maintenance Attention List (2020, 2019, 2018) which occurred post-inspection, it was observed that for Baghouse 1, compartments found

“leaking” is a common issue noted during the inspections. For 2020, this comment was indicated on 6/1/20, 7/31/20, 10/3/20, 10/16/20, 10/17/20, 10/19/20, 10/23/20. The concern is the frequency of compartments found “leaking” within Baghouse 1 which has the potential to contribute to excess emission events.

During the records review of the 2018 Maintenance Attention List, on 01/27/18 it was documented that the Baghouse 1 booster fan was inspected and cleaned with the following note: “small directional blades are coming apart. Reported problem to supervisor. Going to be fixed on down time per supervisor.” This note was repeated for inspections that occurred on 02/02/18, 02/10/18, 02/16/18, 3/02/18, 03/06/18 and 3/15/18. The concern is the length of time between when the deficiency was initially documented and when the maintenance/repair occurred.

### **C. Operation and Maintenance of Baghouse 1A Bags**

During the records review of the 2018 Maintenance Attention List, it was documented that for the “Ext Furnace Baghouse” (identified as BH-1A by Mr. Lee during the inspection) the comment “shacked all bags in all four compartments for better DP.” This note is found approximately weekly from 01/06/18 through 7/20/18.

At the time of inspection, facility personnel described BH-1A as reverse air unit that had been installed in the early 2000’s (approx.). The concern is that per design, reverse air designed baghouse bags should typically not be manually shaken.

## **IX. Closing Conference**

Following the walk-through inspection and initial file review, a closing conference was held with Mr. Lee, Mr. Wollman, Mr. Ruckwardt, and Mr. Sturdavant where we discussed our inspection observations and Potential Compliance Concern A. We then thanked all representatives for their time and cooperation with the inspection.

Following the closing conference, remaining portions of the records review occurred both at the facility and off-site after the inspection.