U.S. Environmental Protection Agency
Region 5

Purpose: Clean Water Act National Pollutant Discharge Elimination System Compliance Evaluation Inspection

Facility: Zekelman Industries, Inc. – Atlas Tube Division
1855 East 122nd Street
Chicago, Illinois 60633

Inspection Date: August 15, 2022

EPA Representatives:
Jake Berger, Physical Scientist, 312-353-8024, berger.jake@epa.gov
Jason Hewitt, Environmental Engineer, 312-353-3114, hewitt.jason@epa.gov

Facility Representatives:
Robert Werth, Environmental Manager
Eric Mouser, Warehouse Operations Manager
Gerald Kurelko, Plant Manager

Report Prepared by:
Jake Berger, Physical Scientist
Water Enforcement and Compliance Assurance Branch, Section 1

Inspector Signature and Date: Berger, Jake Digitally signed by Berger, Jake Date: 2022.08.31 08:10:46 -05'00'

Approver Name and Title: Molly Smith, Section 1 Supervisor, Water Enforcement and Compliance Assurance Branch

Approver Signature and Date: MOLLY SMITH Digitally signed by MOLLY SMITH Date: 2022.09.02 13:04:54 -05'00'

PURPOSE OF INSPECTION

The purpose of the inspection by the U.S. Environmental Protection Agency (USEPA) at Zekelman Industries, Inc. – Atlas Tube Division (Atlas Tube or Facility) was to describe, evaluate, and document compliance with the Clean Water Act (CWA) and their National Pollutant Discharge Elimination System (NPDES) permit.

BACKGROUND

Atlas Tube manufactures hollow steel products in Chicago, Illinois, and discharges to an unnamed tributary of Lake Calumet. Atlas Tube discharges non-contact cooling water from their cooling tower blowdown and industrial storm water runoff via one combined outfall. This outfall is covered by the Illinois Environmental Protection Agency (IEPA) NPDES Permit # IL0076627 (Permit) which has an Effective Date of February 1, 2018.

INSPECTION

Jake Berger and Jason Hewitt of USEPA first arrived at the Facility at 8:45 a.m. CDT and were met by Gerald Kurelko (Plant Manager). Jake Berger and Jason Hewitt showed him their inspector credentials and identification and were instructed to call Robert Werth (Environmental Manager) who was not at the Facility on the day of the inspection. Jake Berger called Robert Werth at 9:04 a.m. CDT and explained the purpose of the inspection and began the opening conference.

Opening Conference

USEPA staff explained to Robert Werth that the purpose of the inspection was to:

- Review Atlas Tube's records such as sample measurements, monitoring activities, and storm water plans, as required by the Permit
- Conduct a walkthrough of the Facility;
- Identify locations where storm water control had the potential to be insufficient; and
- Inform Atlas Tube of areas of concern regarding the records review and facility walkthrough.

Records Review

Since Robert Werth was not able to review documents in person with USEPA, Jake Berger requested electronic copies of Atlas Tube's Storm Water Pollution Prevention Plan (SWPPP), Spill Prevention Control and Countermeasures (SPCC) plan, quarterly visual observations, annual facility inspections, and employee storm water training records. Robert Werth sent these documents to Jake Berger via email on August 16. Upon USEPA's review of these documents (which occurred after the in-person inspection had concluded), no areas of concern were

identified. The phone call with Robert Werth concluded at 9:49 a.m. CDT and was immediately followed by a Facility walkthrough tour with Eric Mouser (Warehouse Operations Manager).

Facility Walkthrough

USEPA staff made the following observations during the Facility walkthrough, further documented in the Photograph Log (attached):

- As shown in Photo 2 and Photo 3, sections of the banks of the storm water swale have little to no vegetation and are showing signs of erosion.

- As shown in Photo 3, sections of the storm water swale contain underground pipes that are clogged with trash and debris.

- As shown in Photo 4, totes containing a mixture of oil and water are stored outside and lack secondary containment.

The Facility walkthrough tour ended at 10:40 p.m. CDT and was immediately followed by the closing conference.

Closing Conference

During the closing conference, USEPA staff explained to Eric Mouser that the provided documents would be reviewed later and that an inspection report would be sent to Robert Werth. USEPA confirmed that no information collected during the inspection was considered Confidential Business Information. USEPA concluded the inspection and left the Facility at 10:45 a.m. CDT.

Zekelman Industries, Inc. – Atlas Tube Division
EPA Inspection 8/15/2022
All photos taken by Jake Berger, Physical Scientist, U.S. EPA
Camera: Olympus TG-6

1: P8150001
Description: Starting location of storm water swale
Camera Direction: W
Date/Time: 8/15/2022 – 9:54 a.m. CDT

2: P8150002
Description: Storm water swale, open dumpsters, leachate in swale
Camera Direction: S
Date/Time: 8/15/2022 – 9:56 a.m. CDT

3: P8150003
Description: Storm water swale containing build up of trash and debris
Camera Direction: N
Date/Time: 8/15/2022 – 9:58 a.m. CDT

4: P8150004
Description: Totes containing a mixture of oil and water
Camera Direction: NW
Date/Time: 8/15/2022 – 10:05 a.m. CDT

5: P8150005
Description: Discharge of non-contact cooling water, drains to storm water swale
Camera Direction: E
Date/Time: 8/15/2022 – 10:11 a.m. CDT

6: P8150006
Description: Discharge of non-contact cooling water, drains to storm water swale
Camera Direction: E
Date/Time: 8/15/2022 – 10:11 a.m. CDT

7: P8150007
Description: Storm water inlets and laydown yard
Camera Direction: NW
Date/Time: 8/15/2022 – 10:19 a.m. CDT

8: P8150008
Description: Storm water inlets and laydown yard
Camera Direction: NW
Date/Time: 8/15/2022 – 10:19 a.m. CDT

9: P8150009
Description: Storm water swale near where outfall pipe leaves the property, facing upstream
Camera Direction: W
Date/Time: 8/15/2022 – 10:33 a.m. CDT

10: P8150010
Description: Storm water swale near where outfall pipe leaves the property, facing downstream
Camera Direction: E
Date/Time: 8/15/2022 – 10:33 a.m. CDT

11: P8150011
Description: Upstream view of storm water swale on north end of site
Camera Direction: E
Date/Time: 8/15/2022 – 10:34 a.m. CDT

12: P8150012
Description: Downstream view of storm water swale on north end of site
Camera Direction: W
Date/Time: 8/15/2022 – 10:35 a.m. CDT