

**CWA COMPLIANCE EVALUATION INSPECTION REPORT
U.S. ENVIRONMENTAL PROTECTION AGENCY, REGION 5**

Purpose:

Compliance Evaluation Inspection

Facility:

Pilkington North America, Inc.
300 20th Avenue
Ottawa, Illinois 61350
LaSalle County
41.330620202591625, -88.87690647116492

NPDES Permit Number:

IL0001384
ILR007526
ILP000368

Date of Inspection:

March 13, 2025

EPA Representatives:

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Report Prepared by:

Benjamin Atkinson, Inspector

Inspector Signature: Atkinson, Benjamin Digitally signed by Atkinson, Benjamin
Date: 2025.05.09 13:20:21 -05'00'

Approver Name and Title: Ryan J. Bahr, Section 2 Supervisor, Water Enforcement and Compliance Assurance Branch

Approver Signature: Bahr, Ryan Digitally signed by Bahr, Ryan
Date: 2025.05.09 13:43:16 -05'00'

1. BACKGROUND

On March 13, 2025, EPA conducted an NPDES Clean Water Act (CWA) compliance inspection at the Pilkington North America, Inc facility (Facility) in Ottawa, Illinois. This inspection was performed pursuant to Section 308(a) of the Federal Water Pollution Control Act, as amended.

This report is based on information supplied by Pilkington North America, Inc. representatives, direct observations made by EPA Region 5 inspectors, records and reports maintained by the Facility and other information including: photographs taken by EPA Region 5 inspectors, verbal or written statements made by Facility representatives during or subsequent to the on-site Inspection, and materials, processes, data, photographs, or documents shown, demonstrated, or submitted to the EPA Region 5 inspectors by Facility representatives during or subsequent to the on-site Inspection. In addition, information gathered prior to or subsequent to the Inspection from a review of US Environmental Protection Agency (EPA), state, and/or public records may be included in this report.

The Facility is a float glass manufacturing operation. The Facility takes earth materials (low iron silica sand, dolomite, limestone), salt cake, soda ash, and cullet (broken recycled glass) and combines them in a furnace. The molten glass is then extruded on a bed of molten tin. The molten glass has a lower density than the molten tin and floats across the tin. The glass is then stretched and widened to the necessary thickness. Different coatings are then sprayed onto the glass to give it the desired properties (e.g. reflectiveness or heat resistance). The Facility produces approximately 400-500 tons of glass every day. The Facility has approximately 188 employees and operates 3 shifts 24 hours a day with no scheduled shutdown periods.

All sanitary and process wastewater is discharged to the City of Ottawa's Publicly Owned Treatment Works (NPDES Permit #IL0030384). Municipal water is used at the Facility for kitchens, bathrooms, to wash coating sprayers, and to rinse the finished glass. Coating sprayer wash water is collected in a tank, checked for pH, and then discharged to the sanitary sewer. 40 CFR 403.5(a)(1) states that "These general prohibitions and the specific prohibitions in paragraph (b) of this section apply to each User introducing pollutants into a POTW whether or not the User is subject to other National Pretreatment Standards or any national, State, or local Pretreatment Requirements". 40 CFR 426 Subpart E – Float Glass Manufacturing Subcategory states that "The provisions of this subpart are applicable to discharges of pollutants resulting from the process in which several mineral ingredients (sand, soda ash, limestone, dolomite, cullet, and other ingredients) are mixed, melted in a furnace, and floated on a molten tin bath to produce float glass." Based on the process description, the Facility would meet the applicability for inclusion in Subpart E. 40 CFR 426.56, pretreatment standards for new sources, states "Any new source subject to this subpart that introduces process wastewater pollutants into a publicly owned treatment works must comply with 40 CFR part 403." There are no pretreatment standards for existing sources listed under 40 CFR 426 Subpart E.

All raw materials are brought in by truck or rail. Raw materials are stored indoors. Cullet glass is stored outdoors. Chemicals used at the Facility are stored in the Hazardous Material Buildings which have no floor drains and spill kits available. Used oil is collected in drums and removed by a third-party. The Facility uses self-contained parts washers with the spent cleaning liquid being removed by a third-party.

Storm water from the Facility either flows southeast to the Illinois River or is collected in the storm water collection system and conveyed to the Illinois River through one of the five permitted outfalls. Storm water discharges from the Facility are currently covered by administratively extended NPDES Permit IL0001384 which expired August 31, 2017. The Facility applied for coverage under the Illinois General Storm Water Permit for Industrial Site Activities and were granted coverage on June 4, 2018. The Facility submitted a Notice of Intent for renewal of the General Storm Water Permit on August 4, 2022. On August 5, 2022, the Facility received a notice of non-receipt for DMRs required by IL0001384. On January 2, 2023, the Facility requested termination of IL0001384 as they had coverage under the general storm water permit. On July 27, 2023, IEPA notified the Facility that they were not eligible to be covered under the general storm water permit as their discharges had an existing individual permit that contained limitations or conditions not part of the general permit and that the Facility would need to reapply for the individual permit. The Facility submitted their reapplication and received their draft individual permit for review on April 19, 2025.

2. SITE INSPECTION

US EPA inspectors Ben Atkinson and Sophie Bazan (the Inspectors) met with Illinois EPA working supervisor Nancy Sisson arrived at the Facility at approximately 9:20 AM on March 13, 2025. The Inspectors met with Mr. Michael Melton, EHS Group Leader, and presented their credentials, explained the purpose of the inspection, and asked if there was a space where they could meet to collect background information about the Facility. Mr. Melton led the Inspectors to a conference room where the opening conference and interview portion of the inspection were held. The Inspectors explained the format of the inspection, that they would be making observations regarding both pre-treatment and industrial storm water. They also notified Mr. Melton of the Facilities right to claim information as confidential business information (CBI). Mr. Melton stated that he did not think there would be CBI, but he would inform the Inspectors if CBI became relevant.

The Inspectors then conducted the interview portion of the inspection. Information collected is presented in Section 1 above.

Following the interview portion of the inspection, the Inspectors along with Mr. Melton and Ms. Sisson began the walkthrough of the Facility. The Inspectors walked through the transfer hall and observed a spill kit (photo 1). The Inspectors walked south through the equipment repair shop and observed water on the ground (photo 2) where equipment had been washed. The Inspectors observed that the water was flowing to a floor drain (photo 3). EPA continued walking south and observed a used oil storage area and a self-

contained parts washer (photos 4 and 5). The Inspectors continued walking south and observed a brick cutting area for refractory brick with wet saws. EPA observed floor drains below the saws with standing water (photos 6 and 7). Adjacent to the brick cutting area, the Inspectors observed a storm water sewer manhole cover and questioned if the wet saw drains were connected to the storm water sewer. The facility inspector stated that he believed all internal drains were connected to the sanitary sewer (photo 8).

The Inspectors continued walking south and observed a pile of cullet and debris in the area identified as Hogan's Alley (photo 10). The Inspectors then walked south and observed storm water drains in a loading dock and outside of the southwest corner of Building 5 (photos 11 and 12).

The Inspectors then observed the hazardous material storage buildings. The Inspectors observed the collection sump pits within the hazardous material storage building. Facility personnel stated that the sump pits would be pumped out in the event of a spill and that they were not connected to either the sanitary or storm water drains (photos 13 and 14). The Inspectors walked east and observed tanks marked as corrosive and toxic as well as barrels of antifreeze (photos 15-17).

The Inspectors then walked northeast to the fin fans and cooling water tower. The Inspectors observed a pipe from the cooling water tower that was routed down to a storm water drain (photos 18 and 19). The Inspectors observed multiple storm water drains around the fin fans as well as a leaking pipe (photos 20-25).

The Inspectors walked southwest to the south side of the hazardous material building and observed a concrete structure in the ground with a metal lid. The Inspectors looked inside and observed storm water pipes. The Inspectors noted that the pipes were approximately half filled with sediment and glass fragments (photos 26 and 27).

The Inspectors walked west and observed two open top dumpsters (photo 28). The Inspectors walked southwest and observed Building 7 which was used now for storage (photos 29 and 30). The Inspectors then walked east and observed fuel tanks within a concrete containment structure (photo 31).

The Inspectors then walked southwest and observed the lift station that had been installed to convey sanitary and process waste water from the Facility to the municipal sewer system. The Inspectors observed a storm water drain with fragments of silt fence around it west of the lift station (photo 32). The Inspectors also observed a large concrete pit into which water was flowing (photo 33). The Inspectors observed the location from which the sample collected samples from the discharge from the lift station (photos 34 and 35).

The Inspectors then walked northeast to what was identified by the facility personnel as Outfall 002. The Inspectors observed that there was flow from the outfall (photos 36 and 37). The Inspectors asked when the most recent precipitation event had occurred. The facility personnel stated it was March 4th. The Inspectors walked north and observed a storm water drain (photo 38). The Inspectors heard the sound of water flowing in the

drain. The Inspectors walked northeast and observed a concrete structure into which it appeared that two pipes discharged from the north and one pipe conveyed flow to the south toward the Illinois River (photos 39 and 40). The Inspectors then walked southeast and observed what was identified as Outfall 003. The Inspectors observed flow coming from the outfall to the Illinois River (photo 41). The Inspectors observed a white manhole east of Outfall 003 (photo 42). The Inspectors continued to walk northeast and observed what was identified as Outfall 005. The Inspectors observed slight flow coming from the outfall and more flow from under the outfall pipe (photo 43). The facility personnel stated that this outfall was sampled monthly using a 6-foot sampling pole.

The Inspectors walked northeast and observed the area around the bulk batch building. The Inspectors observed white powder on the road, ground, on the concrete slope down to the Illinois River, and around a storm water drain (photos 44-49). The Inspectors also observed Outfall 008 (photo 50). The Inspectors observed a waste bag with white powder around the base near a storm water drain inlet on the northeast side of the bulk batch building (photo 53 and 54). The Inspectors also observed a white pipe discharging a liquid from the northeast side of the bulk batch building (photos 55 and 56). The Inspectors also observed a storm water drain with a sediment filter (photo 57).

The Inspectors walked northeast and observed a structure with a concrete pit with pipes (photos 58 and 59). Facility personnel stated that they weren't sure what the structure had been used for, but that it was no longer in use. The Inspectors walked southwest to the area south of the south end of the furnace building and observed an open topped dumpster with damage that would allow storm water to flow out, a storm water drain with no filter, and a storm water drain with a filter (photos 60, 61, and 63). The Inspector then walked into the north end of the furnace building and observed where mixed batches of raw materials are fed into the furnace (photo 62).

The Inspectors then walked to the maintenance building and observed the pH neutralization tank (photos 64 and 66). The facility personnel stated that the wash water from the coating applicators was collected and sent to the tank for testing and pH adjustment, if necessary, prior to discharge to the sanitary sewer. The Inspectors observed the "Neutralization Tank Drainage Record" (photo 65). The Inspectors noted that the pH seemed relatively stable around pH 7 with one outlier showing a pH of 2.28 with the note "Not drained. Added NaOH".

The Inspectors then walked north in the building and observed the coating sprayers with collection pit below for wastewater collection (photo 67). The Inspectors then walked north and observed the glass leaving the tin bath and proceeding down the cold end of the building (photo 68). The Inspectors observed chemical storage and water filtration equipment within containment curbs. The Inspectors noted what appeared to be chemicals that had seeped out of containment (photos 69-71). The Inspectors continued walking north and observed the area used to wash the glass prior to cutting to size (photos 72 and 73).

This concluded the walkthrough of the facility and the Inspectors returned to the conference room for further records review and the closing conference.

3. Closing Conference and Post-Inspection

Upon returning to the conference room, the facility personnel provided a binder with the facility's SWPPP, inspection records, training records, and correspondence with EPA and IEPA concerning permitting and pretreatment requirements. The Inspectors requested that a copy of the binder be sent to EPA for review. While reviewing the documents, the Inspectors realized that Outfall 004 had not been observed. The facility personell stated that he believed he had mis-named the first outfall observed as 002 when it was in fact 003. This meant that what was previously identified as Outfall 002 was Outfall 003 and what was Outfall 003 was Outfall 004.

The Inspectors identified the following areas of concern during the inspection:

1. EPA observed white powder around the bulk batch building including in the road, around storm water drains, and on the concrete embankment, and up to the edge of the Illinois River.
2. EPA observed non-stormwater discharges from the outfalls 003, 004, and 005 occuring during dry weather.
3. EPA observed the proximity of the brick cutting wet saw collection drain to a storm water manhole.

Following the inspection, the facility submitted the copy of the binder electronically. A list of the documents received are in attachment C. On a follow-up call, facility personnel stated that the white powder observed on the ground near the bulk batch building was silica sand, crushed dolomite, and limestone. Adittionally, facility personnel stated that the reported flow reported on monthly Dischare Monitoring Reports for Outfall 005 is calculated based on precipitation amount.

Additional areas of concern identified after the inspection:

1. The permit applications included documents that state that the receiving water (Illinois River) is not impaired. The Illinois River is listed as impaired on the 303D list for bacteria and other microbes, mercury, PCBs, and pesticides.

The current permit (IL0001384) requires under Special Condition 6. A. that for waters not classified as impaired pursuant to Section 303 {d) of the Clean Water Act:

“Unless otherwise specified by federal regulation, the storm water pollution prevention plan shall be designed for a storm event equal to or greater than a 25-year 24-hour rainfall event.”

For waters classified as impaired pursuant to Section 303(d) of the Clean Water Act:

“For any site which discharges directly to an Impaired water Identified In the Agency's 303(d) listing, and If any parameter In the subject discharge has been identified as the cause of impairment, the storm water pollution prevention plan shall be designed for a storm event equal to or greater than a 25-year 24-hour rainfall event. If required by federal regulations, the storm water pollution prevention plan shall adhere to a more restrictive design criteria.”

The SWPPP provided by the facility listed estimated discharge quantities based on the 10-year 24-hour rainfall event.

2. The current permit (IL0001384) requires under Special Condition 6. E. that the SWPPP contain a topographic map or site map showing, among other things
 - a. Discharge points
 - b. Storm water conveyance and discharge structures

The SWPPP provided by the facility did not show the actual discharge points or storm water conveyance structures.

3. The SWPPP Section 12. Good Housekeeping states that “Good housekeeping practices are designed to maintain a clean and orderly work environment. By implementing careful materials handling and storage practices and properly maintaining equipment potential pollution problems are eliminated. Spills and leaks of any size are properly and promptly cleaned.”

EPA observed white powder around the bulk batch building including in the road, around storm water drains, and on the concrete embankment, and up to the edge of the Illinois River which had not been properly and promptly cleaned.

4. The current permit (IL0001384) requires under Special Condition 6. D. that “The plan should also be amended if the discharger is in violation of any conditions of this permit, or has not achieved the general objective of controlling pollutants in storm water discharges.”

EPA observed white powder around the bulk batch building including in the road, around storm water drains, and on the concrete embankment, and up to the edge of the Illinois River which is not achieving the general objective of controlling pollutants in storm water discharges.

5. The current permit (IL0001384) requires under Special Condition 6. G. states that “The [SWPPP] shall include a certification that the discharge has been tested or evaluated for the presence of non-storm water discharge. The

certification shall include a description of any test for the presence of non-storm water discharges, the methods used, the dates of the testing, and any onsite drainage points that were observed during the testing. Any facility that is unable to provide this certification must describe the procedure of any test conducted for the presence of non-storm water discharges, the test results, potential sources of non-storm water discharges to the storm sewer, and why adequate tests for such storm sewers were not feasible.”

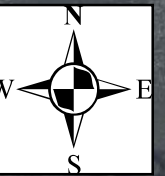
The SWPPP states “NSG hereby certifies that the storm water discharge has been evaluated for the presence of non-storm water discharges. This evaluation was a visual check of all storm water discharge points from the facility during a storm water event. All discharge pipes have traced to origin to assure that non-storm water discharges were not occurring.”

The certification in the SWPPP does not include the method used or the dates of the testing. Additionally, EPA observed non-storm water discharges from outfalls 003, 004, and 005 during the inspection.

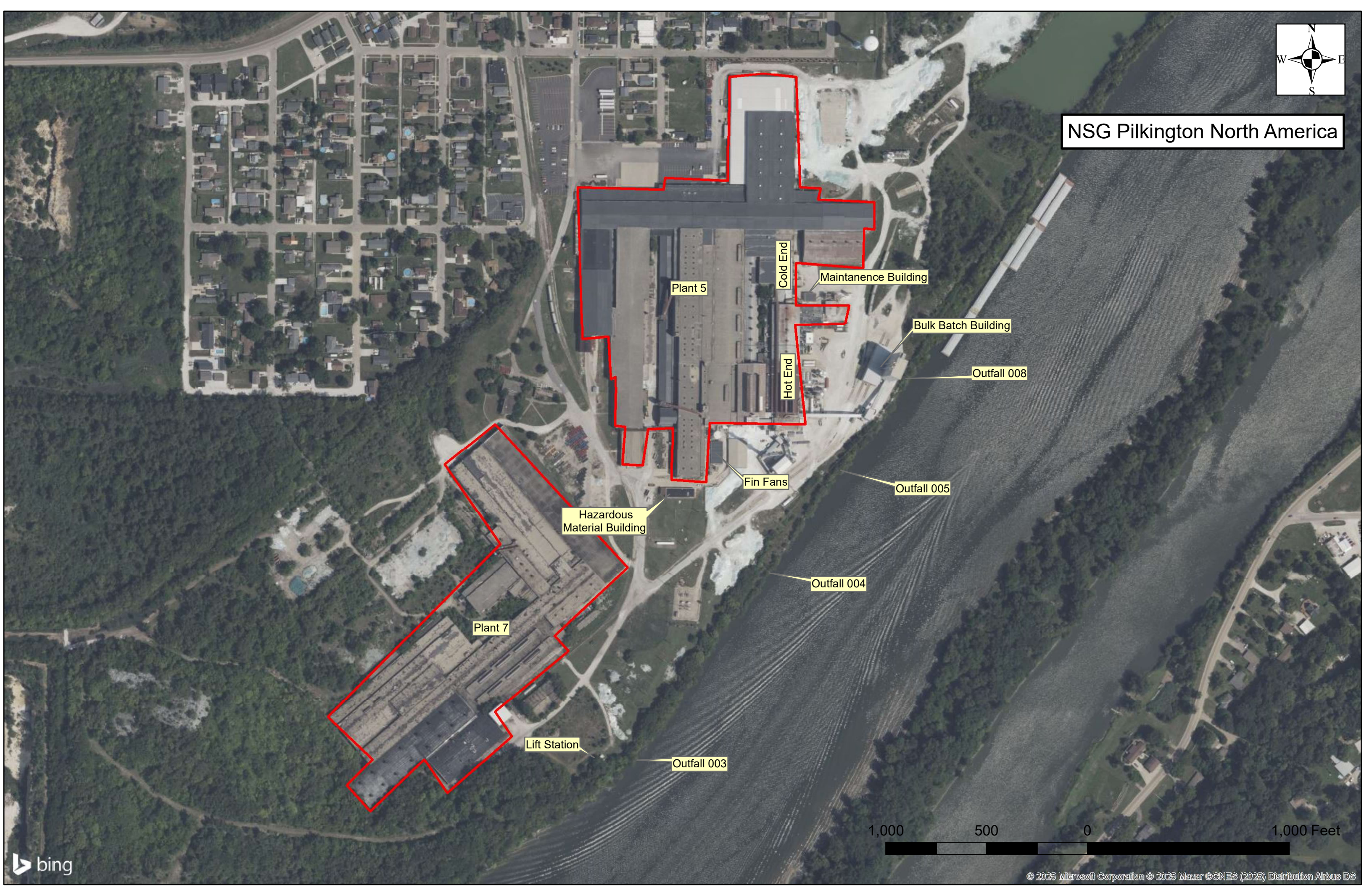
1. LIST OF ATTACHMENTS

- A) Aerial photograph of NSG Pilkington Group North America with buildings and waterways labeled.
- B) Site map from the SWPPP
- C) List of documents received from the facility
- D) Photolog

Attachment A



NSG Pilkington North America



Attachment B

Attachment C

Attachment C

Documents Received from Facility

1. PNA SWPPP TOC.pdf
2. Tab 1 - IEPA 06 24 2018 letter providing NPDES Permit No ILR007525 Notice of Coverage including PNA NOI in scan.pdf
3. Tab 1 - NPDES No. IL0001384.pdf
4. Tab 1 - NPDES No. ILR000000.pdf
5. Tab 1 - NPDES No. ILR007526.pdf
6. Tab 1 - PNA NOI email letter and form correspondence dated 08 04 2022 to renew NPDES Permit No ILR007526.pdf
7. Tab 2 - IEPA letter dated 12 22 2021 for failure to submit 06 18 to 06 19 and 06 20 to 06 21 Annual Inspection Reports.pdf
8. Tab 2 - PNA 01-07-2022 email to IEPA providing missing reports outlined in 12-22-2021 IEPA Letter.pdf
9. Tab 2 - PNA Annual NPDES Inspection Report submitted 07 09 2023 for 06 22 to 06 2023.pdf
10. Tab 2 - PNA Annual NPDES Inspection Report submitted 08 09 2022 for 06 2021 to 06 2022.pdf
11. Tab 2 - PNA Annual NPDES Inspection Report submitted for 06 2023 to 06 2024.pdf
12. Tab 2 - PNA current SWPPP as Document No 906I2073 SOP Revision No 15 in 10 2024.pdf
13. Tab 2 - Training records for NPDES Permit Reporting Year Ending 06 2023.pdf
14. Tab 2 - Training records for NPDES Permit Reporting Year Ending 06 2024.pdf
15. Tab 2 - Training records for NPDES Permit Reporting Year Ending 06 2025.pdf
16. Tab 3 - 2024 Storm Water Visual quarterly inspection Q4 .pdf
17. Tab 3 - 2024 Storm Water Visual quarterly inspection Q1 .pdf
18. Tab 3 - 2024 Storm Water Visual quarterly inspection Q2 .pdf
19. Tab 3 - 2024 Storm Water Visual quarterly inspection Q3 .pdf
20. Tab 3 - 2025 Storm Water Visual Quarterly Inspection Q1.pdf
21. Tab 5 - August 2022 emails between PNA and IEPA over DMR requirements for terminated NPDES Permit No IL0001384.pdf
22. Tab 5 - IEPA 02 01 2018 correspondence on No Exposure Certification letter submitted by PNA on 12 27 2017.pdf
23. Tab 5 - IEPA 06 04 2018 IEPA Letter to PNA Providing Notice of Coverage for NPDES Permit No ILR007526.pdf
24. Tab 5 - March 2024 email exchange between IEPA and PNA related to January 2009 categorical baseline report submittal.pdf

25. Tab 5 - Nov and Dec 2022 emails between PNA and IEPA over DMR needs for terminated NPDES Permit No. IL0001384.pdf
26. Tab 5 - Paper copy of 01 29 2009 PNA Baseline Report per 40 CFR 403.12.pdf
27. Tab 5 - PNA 01 02 2023 correspondence to IEPA to terminate NPDES permit #IL0001384.pdf
28. Tab 5 - PNA 04 25 2023 email to NetDMR notifying that PNA requested that IEPA terminate NPDES Permit No IL0001384.pdf
29. Tab 5 - PNA 07 18 2024 letter to IEPA Providing Annual Certification Report per 40 CFR part 403.12.pdf
30. Tab 5 - PNA 08 07 2023 Annual Certification Report to IEPA per CFR part 403.12.pdf
31. Tab 5 - PNA 08 15 2022 Annual Certification Report to IEPA per 40CFR part 403.12.pdf
32. Tab 5 - USEPA 02 08 2024 Correspondence related to wastewater discharge to sewers and need to submit info via online portal.pdf

Attachment D

Pilkington North America, Inc.
EPA Inspection 3/13/2025
All photos taken by Sophie Bazan, Physical Scientist, U.S. EPA
Camera: Canon PowerShot SX230 HS
NOTE: Times shown in photo timestamp are one hour early.



1: IMG_0178

Description: Spill Kit located in transfer hall.

Location: Transfer Hall.

Camera Direction: West

Date/Time: 3/13/2025 11:13



2: IMG_0179

Description: Water flowing from washed down equipment to a drain inside the facility.

Location: Equipment Repair Shop.

Camera Direction: West

Date/Time: 3/13/2025 11:17



3: IMG_0180

Description: Water flowing from washed down equipment to a drain inside the facility.

Location: Equipment repair shop.

Camera Direction: West

Date/Time: 3/13/2025 11:17



4: IMG_0181

Description: Used oil storage.

Location: Equipment repair shop.

Camera Direction: South

Date/Time: 3/13/2025 11:19



5: IMG_0182

Description: Self contained parts washer.

Location: Equipment repair shop.

Camera Direction: West

Date/Time: 3/13/2025 11:21



6: IMG_0183

Description: Wet brick cutting area with drain below.

Location: Brick shop.

Camera Direction: West

Date/Time: 3/13/2025 11:23



7: IMG_0184

Description: Drain with standing water below wet brick cutting area.

Location: Brick shop.

Camera Direction: Down

Date/Time: 3/13/2025 11:24



8: IMG_0185

Description: Storm sewer manhole adjacent to brick shop.

Location: Adjacent to brick shop.

Camera Direction: Down

Date/Time: 3/13/2025 11:27



9: IMG_0186

Description: Make up water flow meter.

Location: Plant 5.

Camera Direction: North

Date/Time: 3/13/2025 11:28



10: IMG_0187

Description: Landfill-bound cullet and other debris.

Location: Hogan's Alley.

Camera Direction: West

Date/Time: 3/13/2025 11:33



11: IMG_0188

Description: drain on southwest corner of Plant 5.

Location: Southwest Corner of Plant 5.

Camera Direction: East

Date/Time: 3/13/2025 11:41



12: IMG_0189

Description: Drain on the southwest corner of Plant 5.

Location: Southwest Corner of Plant 5.

Camera Direction: Northeast

Date/Time: 3/13/2025 11:42



13: IMG_0190

Description: Sump pit inside hazardous material building.

Location: Hazardous Material Building.

Camera Direction: South

Date/Time: 3/13/2025 11:44



14: IMG_0191

Description: Overview of a room inside the hazardous material building.

Location: Hazardous material building.

Camera Direction: South

Date/Time: 3/13/2025 11:45



15: IMG_0192

Description: Tanks with corrosive/toxic chemicals east of hazardous material building.

Location: Northeast corner of hazardous material building.

Camera Direction: East

Date/Time: 3/13/2025 11:48



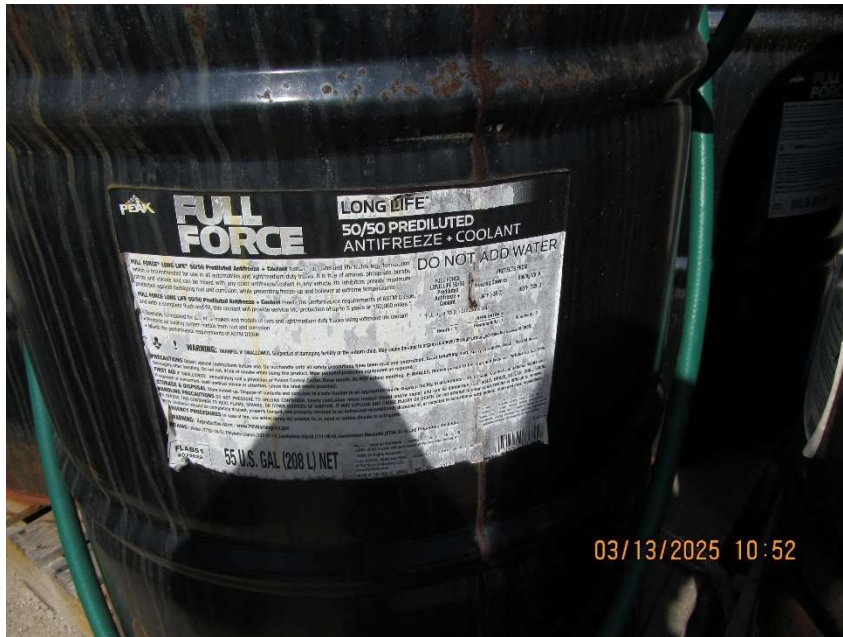
16: IMG_0193

Description: Drums of antifreeze near cullet yard.

Location: Cullet yard.

Camera Direction: Northwest

Date/Time: 3/13/2025 11:52



17: IMG_0194

Description: Label on drum of antifreeze near cullet yard.

Location: Cullet Yard.

Camera Direction: Northwest

Date/Time: 3/13/2025 11:52



18: IMG_0195

Description: Pipe entering drain from cooling water tower.

Location: Cooling water tower.

Camera Direction: down

Date/Time: 3/13/2025 11:57



19: IMG_0196

Description: Cooling water tower.

Location: Cooling water tower on south side of plant 5.

Camera Direction: West

Date/Time: 3/13/2025 11:58



20: IMG_0197

Description: Drain adjacent to cooling water tower.

Location: South side of plant 5.

Camera Direction: down

Date/Time: 3/13/2025 12:00



21: IMG_0198

Description: Drain outside plant 5.

Location: South side of plant 5.

Camera Direction: Southwest

Date/Time: 3/13/2025 12:00



22: IMG_0199

Description: Pipes with cooling water heading to cooling water tower.

Location: South side of Plant 5.

Camera Direction: Northeast

Date/Time: 3/13/2025 12:02



23: IMG_0200

Description: Drain outside Plant 5

Location: south side of Plant 5

Camera Direction: down

Date/Time: 3/13/2025 12:02



24: IMG_0201

Description: Drain under fin fans.

Location: East side of Plant 5

Camera Direction: Northeast

Date/Time: 3/13/2025 12:03



25: IMG_0202

Description: Water dripping from cooling water pipe to fin fans.

Location: South of cooling water tower.

Camera Direction: East

Date/Time: 3/13/2025 12:03



26: IMG_0203

Description: Underground pipes filled about halfway with sediment and glass pieces.

Location: South side of hazardous material building

Camera Direction: down

Date/Time: 3/13/2025 12:07



27: IMG_0204

Description: Underground pipes filled about halfway with sediment and glass pieces.

Location: South side of hazardous material building.

Camera Direction: down

Date/Time: 3/13/2025 12:07



28: IMG_0205

Description: Open top dumpsters southwest of hazardous material building.

Location: Southwest of hazardous material building.

Camera Direction: North

Date/Time: 3/13/2025 12:09



29: IMG_0206

Description: Looking southwest inside plant 7.

Location: Northeast corner of plant 7.

Camera Direction: Southwest

Date/Time: 3/13/2025 12:20



30: IMG_0207

Description: Looking northwest in plant 7.

Location: Northeast corner of plant 7.

Camera Direction: Northwest

Date/Time: 3/13/2025 12:20



31: IMG_0208

Description: Gasoline and diesel tanks with secondary containment.

Location: East side of Plant 7.

Camera Direction: Northeast

Date/Time: 3/13/2025 12:23



32: IMG_0209

Description: Drain with filter fabric on northwest side of lift station.

Location: Lift station.

Camera Direction: Southwest

Date/Time: 3/13/2025 12:32



33: IMG_0210

Description: Pit on west side of lift station with water flowing in.

Location: West of lift station.

Camera Direction: West

Date/Time: 3/13/2025 12:33



34: IMG_0211

Description: Lift station pump with composite sampler from third party sampling company.

Location: South side of the lift station.

Camera Direction: North

Date/Time: 3/13/2025 12:38



35: IMG_0212

Description: Lift station pump with composite sampler.

Location: Lift station.

Camera Direction: down

Date/Time: 3/13/2025 12:38



36: IMG_0213

Description: Identified as Outfall 002 during inspection. Later clarified as actually being Outfall 003.

Location: Outfall 003.

Camera Direction: South

Date/Time: 3/13/2025 12:42



37: IMG_0214

Description: Identified as Outfall 002 during inspection. Later clarified as actually being Outfall 003. Note flowing water.

Location: Outfall 003.

Camera Direction: down Date/Time: 3/13/2025 12:42



38: IMG_0215

Description: Drain north of Outfall 003 with audible water.

Location: Outfall 003.

Camera Direction: North/down

Date/Time: 3/13/2025 12:44



39: IMG_0216

Description: Concrete structure with two inlet pipes and one outlet pipe north of Outfall 004.

Location: North of outfall 004.

Camera Direction: down

Date/Time: 3/13/2025 12:52



40: IMG_0217

Description: Outlet pipe receiving flow from the two inlet pipes in the concrete structure north of Outfall 004.

Location: North of Outfall 004.

Camera Direction: down/East

Date/Time: 3/13/2025 12:53



41: IMG_0218

Description: : Identified as Outfall 003 during inspection. Later clarified as actually being Outfall 004. EPA observed flowing water from the outfall.

Location: Outfall 004.

Camera Direction: Southwest/Down

Date/Time: 3/13/2025 12:59



42: IMG_0219

Description: White manhole east of Outfall 004.

Location: Outfall 004.

Camera Direction: down/East

Date/Time: 3/13/2025 13:04



43: IMG_0220

Description: Outfall 005 with very light flow and groundwater flow beneath the pipe.

Location: Outfall 005.

Camera Direction: Down

Date/Time: 3/13/2025 13:09



44: IMG_0221

Description: White powder on concrete slope down to Illinois River.

Location: South of bulk batch building.

Camera Direction: East

Date/Time: 3/13/2025 13:13



45: IMG_0222

Description: White powder on road, ground, and concrete slope down to Illinois River.

Location: South of bulk batch building.

Camera Direction: East

Date/Time: 3/13/2025 13:13



46: IMG_0223

Description: White powder on road, ground, and concrete slope down to Illinois River.

Location: South of bulk batch building.

Camera Direction: East

Date/Time: 3/13/2025 13:13



47: IMG_0224

Description: White powder on road, ground, and concrete slope down to Illinois River.

Location: South of bulk batch building.

Camera Direction: East

Date/Time: 3/13/2025 13:14



48: IMG_0225

Description: White powder on road, ground, and concrete slope down to Illinois River.

Location: South of bulk batch building.

Camera Direction: South

Date/Time: 3/13/2025 13:14



49: IMG_0226

Description: Storm drain with white powder on it.

Location: South of bulk batch building.

Camera Direction: South/down

Date/Time: 3/13/2025 13:15



50: IMG_0227

Description: Outfall 008.

Location: Outfall 008.

Camera Direction: Southeast/down

Date/Time: 3/13/2025 13:18



51: IMG_0228

Description: Sampling point for Outfall 008 in roadway south of bulk batch building.

Location: Outfall 008.

Camera Direction: down

Date/Time: 3/13/2025 13:19



52: IMG_0229

Description: Additional storm water drain south of bulk batch building.

Location: South of bulk batch building.

Camera Direction: Southeast

Date/Time: 3/13/2025 13:22



53: IMG_0230

Description: Bag receiving material to be discarded on the east side of the bulk batch building.
Note white powder around the base.

Location: Bulk batch building.

Camera Direction: West

Date/Time: 3/13/2025 13:22



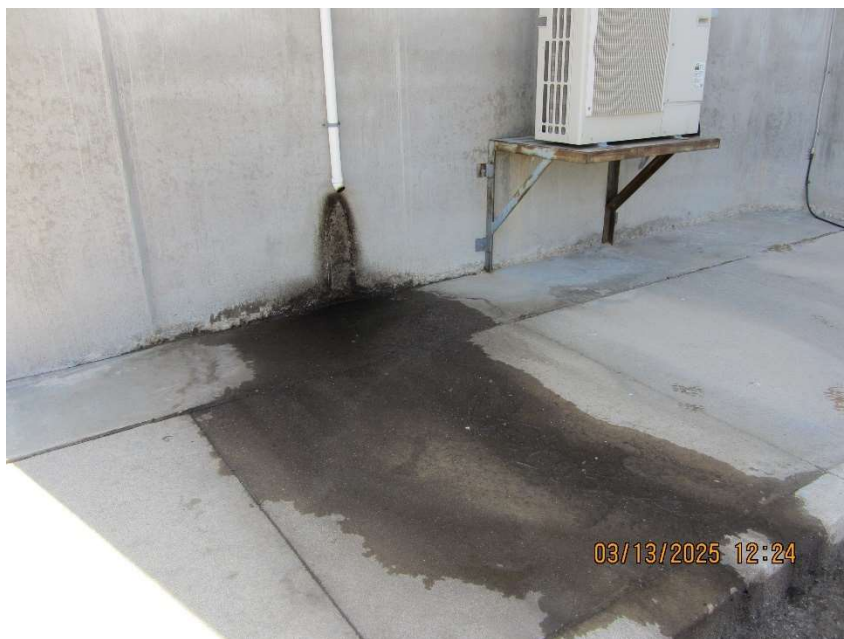
54: IMG_0231

Description: Possible flow path from bulk batch bag to storm water drain.

Location: East side of bulk batch building.

Camera Direction: South

Date/Time: 3/13/2025 13:22



55: IMG_0232

Description: Water draining from pipe on northeast corner of bulk batch building.

Location: Bulk batch building.

Camera Direction: Northwest

Date/Time: 3/13/2025 13:24



56: IMG_0233

Description: Water draining from pipe on northeast corner of bulk batch building.

Location: Bulk batch building.

Camera Direction: Northeast

Date/Time: 3/13/2025 13:24



57: IMG_0234

Description: Storm water drain with filter.

Location: North of bulk batch building.

Camera Direction: Northeast

Date/Time: 3/13/2025 13:25



58: IMG_0235

Description: Building with a small pipe heading northeast.

Location: Northeast of bulk batch building in unnamed structure.

Camera Direction: down

Date/Time: 3/13/2025 13:27



59: IMG_0236

Description: Unnamed structure with small pipe inside heading northeast.

Location: Unnamed structure northeast of bulk batch building.

Camera Direction: East

Date/Time: 3/13/2025 13:28



60: IMG_0237

Description: Dumpster with holes in the bottom east of the furnace building.

Location: East of furnace room.

Camera Direction: North

Date/Time: 3/13/2025 13:34



61: IMG_0238

Description: Storm drain (red arrow).

Location: South of furnace room.

Camera Direction: South

Date/Time: 3/13/2025 13:34



62: IMG_0239

Description: Batch entering furnace on the south end of plant 5.

Location: Furnace room.

Camera Direction: Northwest

Date/Time: 3/13/2025 13:41



63: IMG_0240

Description: Storm water drain with filter around it.

Location: Northeast of maintenance building.

Camera Direction: Down

Date/Time: 3/13/2025 13:52



64: IMG_0241

Description: Neutralization tank which receives collected waste from coating sprayer wash.

Location: Maintenance building.

Camera Direction: Southwest

Date/Time: 3/13/2025 13:54



66: IMG_0243

Description: Sign on neutralization tank showing the capacity of the tank.

Location: Maintenance building.

Camera Direction: West

Date/Time: 3/13/2025 14:00



67: IMG_0244

Description: Coating sprayers and sump below sprayers.

Location: North side of the hot end of the furnace building.

Camera Direction: South

Date/Time: 3/13/2025 14:10



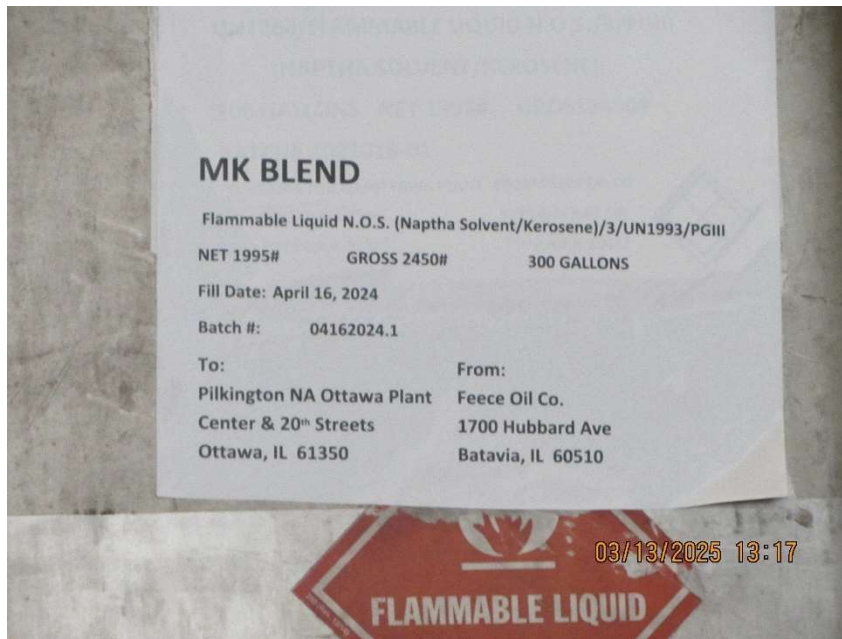
68: IMG_0245

Description: Glass leaving furnace (hot end) and entering cold end of the furnace building.

Location: Furnace building cold end.

Camera Direction: West

Date/Time: 3/13/2025 14:14



69: IMG_0246

Description: Description of chemical contents on container on the south side of the cold end.

Location: Cold end of furnace building.

Camera Direction: North

Date/Time: 3/13/2025 14:17



70: IMG_0247

Description: Containment with contents listed in photo 69.

Location: Cold end furnace building.

Camera Direction: North

Date/Time: 3/13/2025 14:17



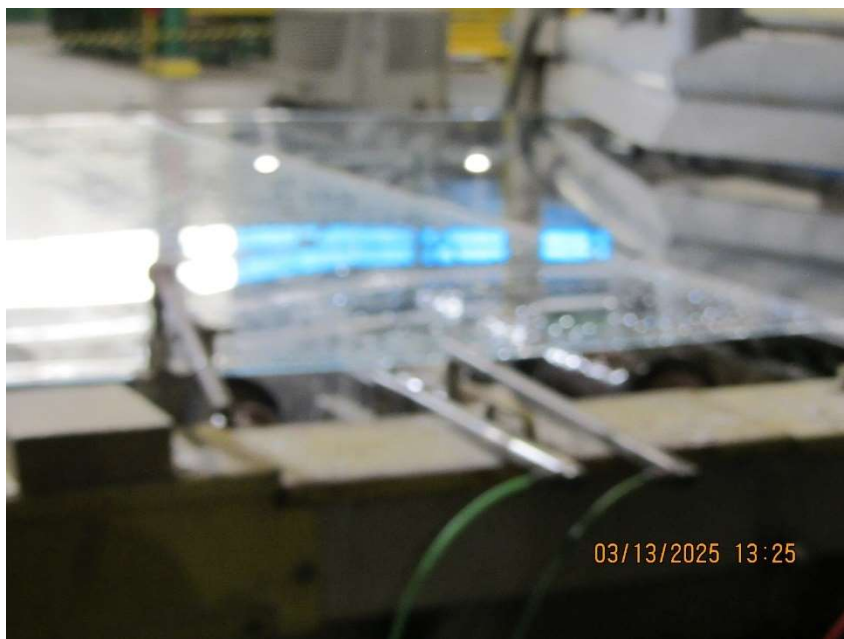
71: IMG_0248

Description: Acids and solids outside of berm.

Location: Cold end of furnace building.

Camera Direction: Northwest

Date/Time: 3/13/2025 14:21



72: IMG_0249

Description: Water used to wash coating off bottom of glass.

Location: Cold end of furnace building.

Camera Direction: Northwest

Date/Time: 3/13/2025 14:25



73: IMG_0250

Description: Water being used to wash coating off bottom side of glass.

Location: Cold end of furnace building.

Camera Direction: Northwest

Date/Time: 3/13/2025 14:25



74: IMG_0251

Description: Map of facility from SWPPP binder.

Location: Conference Room.

Camera Direction: down

Date/Time: 3/13/2025 14:49



75: IMG_0252

Description: Map of facility from SWPPP binder.

Location: Conference Room.

Camera Direction: Down

Date/Time: 3/13/2025 14:49



76: IMG_0253

Description: Map of facility from SWPPP binder.

Location: Conference Room.

Camera Direction: down

Date/Time: 3/13/2025 14:49