



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

**DATE:** 06/29/2021

**SUBJECT:** CLEAN AIR ACT INSPECTION REPORT  
Allied Tube and Conduit Corp., Harvey, IL

**FROM:** Karyn DeFranco, Inspector  
AECAB (MN/OH)

**THRU:** Brian Dickens, Section Chief  
AECAB (MN/OH)

**TO:** File

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**BASIC INFORMATION**

**Facility Name:** Allied Tube & Conduit Corp

**Facility Location:** 16100 South Lathrop Avenue, Harvey, IL 60426

**Date of Inspection:** 05/25/2021 and 05/26/2021

**EPA Inspector(s):**

1. Karyn DeFranco
2. Patrick Miller

**Other Attendees:**

1. James Skalon, EHS Manager, Allied Tube and Conduit Corp.
2. Andrea Feeblackberg, Director for Environmental Sustainability, Atkore Int.
3. Bryan Hart, EHS Specialist Mechanical Products and Solutions, Allied Tube and Conduit Corp.
4. Christopher Pepper, Plant Manager, Allied Tube and Conduit Corp.

**Contact Email Address:** JSkalon@atkore.com

**Purpose of Inspection:** To investigate compliance with the NESHAP for Steel Pickling and the NESHAP for Surface Coating of Miscellaneous Metal Parts and Products.

**Facility Type:** Iron and Steel Pipe and Tube Manufacturing from Purchased Steel

**Regulations Central to Inspection:** 40 C.F.R. Part 63 Subpart CCC and 40 C.F.R. Part 63 Subpart MMMM

**Virtual Opening Conference Start Time:** May 25, 2021, 1:00pm (CST)

**Virtual Opening Conference End Time:** May 25, 2021, 2:01pm (CST)

**Arrival Time:** May 26, 2021, 9:19am (CST)

**Departure Time:** May 26, 2021, 12:25pm (CST)

**Inspection Type:**

- Unannounced Inspection
- Announced Inspection

**OPENING CONFERENCE**

- Presented Credentials
- Stated authority and purpose of inspection
- Provided Small Business Resource Information Sheet
- Small Business Resource Information Sheet not provided. Reason: Not a Small Business.
- Provided CBI warning to facility

The following information was obtained verbally from Allied Tube and Conduit Corporation (Allied Tube) unless otherwise noted.

**Process Description:**

Allied Tube operates a steel pickling and iron and steel pipe and tube manufacturing facility. The majority of steel coils used in production are pickled at the onsite steel pickling building, referred to as the SMPF building, located at 16001 Center Ave. The SMPF building has five acid baths ranging from 1.5-14% hydrochloric acid (HCl) and four recirculating tanks all vented to a scrubber. After pickling, the steel coils are transported to the 16100 South Lathrop Ave building where the coils are unwound, cleaned with an alkaline solution, painted, welded, cleaned with an alkaline and mild HCl solution, galvanized, sized, coated and cut.

**Staff Interview:**

The facility currently has approximately 400 manufacturing employees and typically run three shifts per day, five to six days per week.

Approximately 65 percent of the steel used in production is pickled at the SMPF building onsite. In the SMPF building there are several fan vents in the ceiling to outside. The HCl baths of the pickling line are gravity fed through recirculating tanks. Spent acid is stored temporarily in two spent acid tanks and removed from the facility approximately three times per week. Fresh acid is stored in two storage tanks, approximately 13,000 gallons each and is continuously added to

maintain the correct concentration in the HCl baths. All storage and recirculation tanks are vented to the scrubber as well.

There are seven mills at the facility, and each mill typically runs every day that the facility is operating. Mills #1, 2, 3, 5, 6, and 7 have their HCl-independent system. Mill #8 is a metalizing operation and does not use HCl and typically only runs raw tube or pre-galvanized strips. Mills #1, 2, 3, and 5 share the same alkaline bath/tank that is sealed and does not have an air collection system, and Mills # 6, 7, and 8 each have individual alkaline tanks. HCl concentration of approximately 9% is used in the mills from an 8,850-gallon above ground tank on the north side parking lot on South Lathrop Ave. According to permit requirements, emissions from Mills #1, 2, 3, 5, and 6 are combined and emissions from Mills #7 and #8 are independently calculated. Mills #1, 2, 3, 5, 6 and 7 have pickup points for zinc emission control. Mill #8's baghouse vents inside the building. Mills #1, 2, 3, 5, and 6 vent to cartridge baghouses referred to as "baker" baghouses and Mill #7 vents to a high energy air filtration (HEAF) filter. Mills #2, 3, 6, and 7 use a chromate coating right after the sizing section in the process.

All mill lines apply inner diameter coatings and exterior lacquer coatings. There are mostly water-based lacquer and inner diameter paint coatings in the paint storage and mixing area. Some coatings require the addition of zinc solids which are mixed approximately once per day.

## **TOUR INFORMATION**

**EPA Tour of the Facility:** Yes

### **Data Collected and Observations:**

EPA toured the facility. EPA inspected process areas and emission vents from units. EPA noticed visual emissions from the HCl tank located in the northern parking lot off of Lathrop Ave. EPA inspected the mills and observed fugitive galvanizing emissions from mill #2 directly below a roof opening. EPA also observed that the differential pressure on the Torit for mills #1, 2, 5, and 6 was approximately 0.5 inches of H<sub>2</sub>O.

**Photos and/or Videos:** were taken during the inspection.

**Field Measurements:** were not taken during this inspection.

## **CLOSING CONFERENCE**

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


### **Requested documents:**

- Emissions Calculations for the past 12 complete months;
- HCl usage at SMPF building for the past 12 months;
- Chromate usage for the past 12 months;

- Daily checks of all control devices for the past three months;
- Tank inventory list; and
- SDS and technical data sheets for:
  - General and extreme coatings;
  - Alkaline solution;
  - Degreasing solution; and
  - Flux.

**Concerns:** EPA expressed concerns about visible emissions on galvanizing mill #2. EPA also expressed concerns that the differential pressure on the Torit for mills #1, 2, 5, and 6 was low, potentially contributing to reduced control efficiency.

### **DIGITAL SIGNATURES**

Report Author: **KARYN  
DEFRANCO**  Digitally signed by KARYN  
DEFRANCO  
Date: 2021.06.30 15:20:31 -05'00'

Section Chief: **BRIAN  
DICKENS**  Digitally signed by BRIAN  
DICKENS  
Date: 2021.07.01 07:29:02  
-05'00'

**Facility Name:** Allied Tube and Conduit

**Facility Location:** 16100 South Lathrop Avenue, Harvey, IL 60426

**Date of Inspection:** May 26, 2021

**APPENDICES AND ATTACHMENTS**

1. Appendix A: Digital Image Log

**Facility Name:** Allied Tube and Conduit

**Facility Location:** 16100 South Lathrop Avenue, Harvey, IL 60426

**Date of Inspection:** May 26, 2021

**APPENDIX A: DIGITAL IMAGE LOG**

<b>1. Inspector Name:</b> Patrick Miller	<b>2. Archival Record Location:</b> <i>C:\Users\kdefranc\OneDrive - Environmental Protection Agency (EPA)\Allied Tube Conduit, IL\2021 Inspection\05262021 Inspection Photos</i>
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<b>Image Number</b>	<b>File Name</b>	<b>Date and Time (incl. Time zone and DST)</b>	<b>Latitude and Longitude</b>	<b>Description of Image</b>
1	P5260001.JPG	2021:05:26 09:14:31	41.596063, -87.641603	HCl tank for Mills on South Lathrop Ave
2	P5260002.JPG	2021:05:26 09:14:37	41.596063, -87.641603	HCl tank for Mills on South Lathrop Ave
3	P5260003.JPG	2021:05:26 09:14:42	41.5961, -87.641565	HCl tank for Mills on South Lathrop Ave
4	P5260004.JPG	2021:05:26 10:06:52	41.596111, -87.641389	SMPF Pickling facility heat exchanger and recirculation tanks
5	P5260005.JPG	2021:05:26 10:07:08	41.596111, -87.641389	SMPF Pickling Facility HCl tanks
6	P5260006.JPG	2021:05:26 10:13:08	41.596111, -87.641389	SMPF Pickling Facility Scrubber
7	P5260007.JPG	2021:05:26 10:18:03	41.596111, -87.641389	SMPF Pickling Facility rinse tanks
8	P5260008.JPG	2021:05:26 10:34:50	41.597027, -87.643213	SMPF Pickling Facility Stack
9	P5260009.JPG	2021:05:26 10:49:56	41.596389, -87.643333	Mill #7 scrubber
10	P5260010.JPG	2021:05:26 10:50:08	41.596389, -87.643333	Mill #7 Torit Baghouse
11	P5260011.JPG	2021:05:26 10:54:45	41.596389, -87.643333	Mill #7 HCl bath section with collection header to scrubber
12	P5260012.JPG	2021:05:26 10:57:04	41.596389, -87.643333	Mill #7 galvanizing section with moveable hood for baghouse

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13	P5260013.JPG	2021:05:26 11:01:31	41.596389, -87.643333	Mill #7 cut off/roll out collection hood
14	P5260014.JPG	2021:05:26 11:17:47	41.596389, -87.643333	Mills #6 "Baker" Baghouse for cut off/roll out emissions
15	P5260015.JPG	2021:05:26 11:20:05	41.596389, -87.643333	Mill #6 cut off/roll out collection hood
16	P5260016.JPG	2021:05:26 11:24:53	41.596389, -87.643333	Baker Units (filters) for Mills #1, #3, and #5 (foreground) and Mill #2 (background)
17	P5260017.JPG	2021:05:26 11:29:21	41.596389, -87.643333	Acid Scrubber for emissions from Mills #1, 2, 5, 6
18	P5260018.JPG	2021:05:26 11:31:24	41.596389, -87.643333	Fugitive galvanizing emissions from Mill #2

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**APPENDIX B: FIELD MEASUREMENT DATA**

None