

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

Facility: Hanna Steel Corporation – Pekin Division Plant #7
220 Hanna Drive
Pekin, Illinois 61554

NPDES Permit Number: ILP000217

Purpose: To evaluate compliance with applicable pretreatment regulations under the Clean Water Act (CWA).

Date of Inspection: February 29th, 2024

EPA Region 5 Water Enforcement Compliance Assurance and Illinois EPA Representatives:

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Facility Representatives:

- David Frantz, Safety Environmental Coordinator, Hanna Steel Corporation, dfrantz@hannasteel.com, 309-478-3805
- Randy Rendfeld, General Manager, Hanna Steel Corporation, rrendfeld@hannasteel.com, 309-478-3837

Report Prepared by: Eric Small, Physical Scientist, Water Enforcement and Compliance Assurance Branch

Inspector Signature: ERIC SMALL  Digitally signed by ERIC SMALL
Date: 2024.05.03 14:27:14 -05'00'

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

Approver Signature and Date: Bahr, Ryan  Digitally signed by Bahr, Ryan
Date: 2024.05.06 09:47:33 -05'00'

INTRODUCTION

On February 29, 2024, representatives from the U.S. Environmental Protection Agency, Region 5 conducted a Compliance Evaluation Inspection at Hanna Steel Corporation – Pekin Division Plant #7 in Pekin, Illinois (“Hanna Steel” or “Facility”). The purpose of this inspection was to evaluate this Facility’s compliance with the Clean Water Act and all associated pretreatment regulations as an industrial user that has discharged to the City of Pekin Wastewater Treatment Plant #1.

Concerning pretreatment regulation, EPA has developed nationally applicable pretreatment standards under CWA section 307(b) in its General Pretreatment Regulations for Existing and New Sources of Pollution found in 40 CFR Part 403. There are two entities that maintain the responsibility to develop and implement the federal pretreatment program: an Approval Authority and a Control Authority. An Approval Authority is either the Director of a NPDES-authorized state with an EPA-approved pretreatment program or the Regional Administrator in a state without an approved pretreatment program. A Control Authority is either a Publicly Owned Treatment Works (POTW) with an approved pretreatment program or the Approval Authority for a POTW without an approved program. The City of Pekin Wastewater Treatment Plant #1 does not currently operate an approved pretreatment program and Illinois EPA has not been delegated the pretreatment program; therefore, U.S. EPA is both the Approval Authority and Control Authority for Hanna Steel.

The inspection consisted of the following: an opening conference and discussions surrounding the Facility’s pretreatment activities, a Facility walk-through, and a closing conference. A review of records submitted by the Facility was also conducted after the inspection. The EPA Inspection Team comprised four inspectors: Eric Small and Newton Ellens of U.S. EPA Region 5, and Shannon Soucie and Ying Hilton of Illinois EPA’s Peoria Field Operation Section. Any findings and concerns that EPA identified during the inspection are listed in the section entitled “Areas of Concern” starting on page 13 of this report.

FACILITY BACKGROUND

This Facility is situated on the far southern end of Pekin’s municipal boundaries and is approximately a mile up the bluff from the Illinois River. Inspection information indicates that the Facility was built in 1999 and is celebrating its 25th year of operation. Mr. Rendfeld estimated around 50 employees work at the Facility. Production hours are from 6:00 A.M. until 3:00 A.M. (the following morning) Monday through Thursday and shipping is from 6:00 A.M. until 11:00 P.M. Monday through Friday. Information indicates daily work is composed of two, 10-hour shifts, with workers typically working four 10-hour days each workweek. The inspector confirmed that the City of Pekin provides water to the Facility. When asked about the applicable industrial codes used to categorize Facility operations, Mr. Frantz followed up with

the inspector via email stating that the NAICS code was 332812: Metal Coating, Engraving (except Jewelry and Silverware), and Allied Services to Manufactures and the SIC code was 3317: Steel Pipe and Tubes.

Hanna Steel is headquartered in Hoover, Alabama and maintains two other plants located in Fairfield, Alabama (primarily for painting operations) and Tuscaloosa, Alabama (also with a tube mill). Inspection information indicated that the Facility's current primary product is camper axles, with over 7,000 tons stored inside the warehouse awaiting shipment. Mr. Frantz also stated that the camper axles are composed of steel tubing of varying lengths and sizes (e.g., 3/4" round and square to 4" square, 1/4" sticks, 2" x 5" rectangular, etc.) and are shipped in domestic markets. Additionally, Mr. Frantz indicated that about two years ago was their most successful year, and the commodity market in which they operate is currently steady. Thus, commodity market dictates their production, with little to no seasonal effect. Mr. Small asked the Facility about production variance over the past few years, to which Mr. Frantz, in a subsequent email, stated the following tons of steel have been processed in the past three years: 39,680 tons (2021), 23,916 tons (2022), and 30,000 tons (2023). Mr. Frantz stated that the process is currently a closed-loop system comprising a metal-cooling chiller system, which is routed to a tank and recycled back to the start of the system. Inspection information also indicated that the chiller system is constantly in operation.

Formerly, another process in the Facility involved process wastewater generation from a coil line pickle rinse. Inspection information indicates that the paint line and wastewater treatment system associated with this process has since been decommissioned, with water capped off on April 22, 2021. Mr. Frantz added that the painting jobs that had been fulfilled on Facility grounds have since been assigned to the Fairfield, Alabama plant, because of the metal building part market now preferring galvanized steel over painted product. Since the closure of this process, Mr. Frantz indicated that the Facility now only discharges domestic wastewater and was told by Illinois EPA to simply allow their former discharge permit to expire. The EPA Inspection Team requested any documentation from this discussion, of which Mr. Frantz provided in a follow-up email. As part of this discussion, Mr. Small also requested the past three months of water bills. When asked about Resource Conservation and Recovery Act (RCRA) information from the Facility, Mr. Frantz stated that the Facility was a former large quantity generator – mainly due to spent paint waste – but now is a very small quantity generator due to continued hazardous waste generation, primarily entailing mill coolant.

Receiving POTW

Wastewater from the Facility is within the City of Pekin's sewershed and is treated at the City of Pekin Wastewater Treatment Plant #1 (NPDES Permit No. IL0034995). The inspector received

confirmation during the inspection that pretreated waste, when pretreatment operations had occurred, would have been received by this POTW.

SITE INSPECTION



Exhibit 1: Hanna Steel Corporation – Pekin Division Plant #7, facing southwest; **Source:** Google Earth

Initial Inspection Discussion

The EPA Inspection Team arrived at the Facility at approximately 8:30 A.M. The weather was approximately 40° Fahrenheit and partly cloudy, with no measurable precipitation in the last 24 hours. EPA entered the Facility through the northwestern entrance where the main business office was denoted. The EPA Inspection Team walked into the office and announced their intentions to conduct an inspection under the Clean Water Act and were soon greeted by Mr. David Frantz, Safety Environmental Coordinator, and Mr. Randy Rendfeld, General Manager. Credentials were subsequently presented to both Facility representatives. The opening conference for the inspection commenced at 8:40 A.M. The EPA inspectors also noted that Confidential Business Information provisions could be claimed, though no such claim was made by Facility representatives. Inspectors emphasized the scope of this inspection would focus on pretreatment activities that were recorded to occur at the Facility through submissions to the EPA until June 2021, when the last semi-annual report for pretreatment was received by EPA.

EPA, Illinois EPA, Mr. Frantz, and Mr. Rendfeld then began discussing the Facility's wastewater processes and its compliance with associated environmental rules and regulations related to

pretreatment. The following is a summary of the discussions EPA had with Facility representatives before a walk-through of the site.

Facility Processes and Wastewater Generation

Prior to engaging in a discussion about the different Facility operations, the EPA Inspection Team requested a copy of the wastewater treatment schematic, which Mr. Frantz later provided to the inspector before the writing of this report.

When the wastewater treatment plant was operating, Mr. Frantz stated that it had two operators. Operators would work on three, 8-hour shifts originally, though, by 2008, this had shifted to a singular 10-hour shift three days each month. Mr. Frantz also said that the wastewater line is still present at the Facility as a relic and is relatively intact outside of a caustic tank that was cleaned out and scrapped. If slugs did occur, Mr. Frantz indicated that the Facility had the ability to recirculate water through the process to avoid any illicit discharge. When asked about how often the unit operated, Mr. Frantz said that the system would run a few weeks at a time as it was a “rolls to order” system. He also added that steel was domestically purchased. When asked about communication with the City of Pekin concerning the wastewater operation, Mr. Frantz stated that the main communication entailed obtaining a signature from the City Operator every five years during the permit renewal cycle.

The discussion then turned to a dialogue about how samples were collected. Information indicates that the Facility utilized a GLS composite sampler, which collected water samples for chromium (total), zinc, and cyanide (total) per guidance from the Illinois EPA Water Pollution Control Permit. Information indicates that the Permit matched the Facility with guidelines associated with 40 CFR 465 Subpart A – Steel Basis Material Subcategory requirements. Mr. Frantz added that calculations would also need to be performed from mg/L to lbs/day to evaluate limits. Additionally, pH range sampling was conducted using a dip tester as well as pH probes located in each tank that provided constant screening. Mr. Frantz indicated that each probe was calibrated daily using an in-house log system. Mr. Frantz also added that the Facility maintained a flowmeter for outgoing discharge and that the year of first discharge was also in 1999 when the Facility opened.

Members of the EPA Inspection Team also inquired as to whether or not the Facility had a stormwater pollution prevention plan (SWPPP), which Mr. Frantz indicated had been updated in 2022. Mr. Frantz added that the SWPPP has been shared with Tazewell County and the Pekin Fire Department. The inspectors also stated that no raw materials are stored outside and that Mr. Frantz periodically checks the drainage basin located to the northwest of the Facility.

The tube mill process begins with 40,000-60,000 pounds of coiled steel sent to a slitter, which Mr. Rendfeld said cuts coils into tubes. The tubes are subsequently sent to the tube mill, where

they are uncoiled and run through an accumulator. The accumulator ensures that there is enough steel fed into the system to keep making a weld. Following the accumulator, the steel passes through roller dies that convert the shape of the product from flat to round. The steel is then directed through a copper coil, which is connected to a high-frequency induction coil. Mr. Rendfeld indicated that the induction coil provides the heat necessary to combine adjoining ends. Following this process, a scarfing knife smooths the weld off and rolls excess product off to scrap. Mr. Frantz then said that the tubes are cooled in a cooling trough. Finally, after the tubes are cooled into their final shape, they are cut into varying lengths – averaging between 20-26' – up to 50' due to warehouse space constraints. Mill coolant is stored in process tanks until it is either spent or evaporated. Moreover, Mr. Frantz indicated that the tube mill area is cleaned on a schedule, specifically in the spring and fall.

Following this information, the EPA Inspection Team proceeded to shift the discussion to monitoring that had occurred while the wastewater treatment system was in operation. Mr. Frantz indicated that an ISCO system had assisted in the operation of the wastewater treatment system, which Mr. Frantz said consisted of intermittent discharges – approximately up to 19,000 gallons – at the end of a production line.

Facility Walk-Through

At approximately 10:20 A.M. the EPA Inspection Team was accompanied by Mr. Frantz and Mr. Rendfeld to conduct a walkthrough of the Facility, beginning with a focus on current Facility drains. The first stop on the walkthrough was to the breakroom, where Mr. Frantz uncovered a rug showing a drain (Photo 1 in Attachment A). Mr. Frantz then elaborated on drains found within the Facility, noting that each of two locker rooms had three floor drains as well. Mr. Frantz indicated that the only floor drains throughout the Facility were domestic. Following this discussion, the EPA Inspection Team walked to the north wall of the Facility, where Mr. Frantz pointed out the influent for the domestic waterline (Photo 2 in Attachment A). When Mr. Frantz asked if inspectors would like the serial number, Mr. Small asked for a common descriptor of the influent line. Mr. Frantz stated that the influent is known as “Bay 2 North Wall.” He also indicated that the Facility has two points where the Facility receives influent as well as two locations where effluent is discharged to the sewer system.

From the domestic influent location, the EPA Inspection Team walked the wastewater process in reverse order, guided by Mr. Rendfeld and Mr. Frantz. Mr. Rendfeld pointed out the entry uncoiler located in the northeastern wing of the Facility, which controls the speed and direction of a strip of metal as it unwinds from the coil before slitting (Photo 3 in Attachment A). Facility personnel also identified a filter press, which Mr. Frantz stated had been used to generate “sludge cakes” from the wastewater treatment system (Photo 4 in Attachment A). Mr. Frantz added that sludge from this process was disposed of at the Indian Creek Landfill, located in

rural Tazewell County, approximately three-to-four times a year and was collected in a 66" long dumpster after entering a hopper beneath the filter press. Based on this information, the EPA Inspection Team requested the last three manifests from this waste stream, which were later provided via email by Mr. Frantz.

The group proceeded to walk to the west along the north wall of the Facility to observe the wastewater treatment system. The EPA Inspection Team observed two clarifiers, each with a 2,000-gallon capacity (Photos 5 and 6 in Attachment A). Mr. Frantz stated that the newer clarifier was part of a wastewater treatment plant upgrade performed in June 2001. To the north of these clarifiers along the north Facility wall were the spent and new hydrochloric (HCl) acid tanks, which Mr. Frantz stated had contained HCl (18% by volume) to etch the surface of the steel prior to painting (Photos 7 and 8 in Attachment A). Walking further to the west, Mr. Frantz next pointed out the first of two, 5,000-gallon recirculating acid tanks, known as Recirculating Acid Tank #1 (Photo 9 in Attachment A). Mr. Rendfeld then explained how new HCl would be introduced to Recirculating Acid Tank #2 (Photo 19 in Attachment A) and circulate between the two tanks prior to being discharged. A control panel was also observed on a raised platform, next to two, 330-gallon neutralization tanks (Photos 10-12 in Attachment A). An old pH log was found next to the panel. Facility personnel explained how each neutralizer tank was used to balance out pH, aiding as to whether more acid or caustic should be used prior to discharge.

Mr. Frantz proceeded to turn around and point to the GLS automatic sampler (since decommissioned), located along the north wall (Photo 13 in Attachment A). Information indicates that the GLS had been located approximately 12 yards outside of the building within a horizontal section of the discharge pipe, but the sampler has since been moved inside. Mr. Frantz estimated that, when working, the GLS sampled batch discharge approximately every 10 to 15 minutes as needed. Mr. Frantz indicated that four, 150-gallon tanks at the base of the raised platform had contained a flocculant, water, and two designated smaller tanks for caustic (Photos 14-18 in Attachment A).

Following this observation, Mr. Rendfeld guided the EPA Inspection Team to a four-section water rinse, where water would cascade to wash product prior to being directed to the neutralizing tanks. The EPA Inspection Team then observed a leveler, which Mr. Rendfeld said flattened out the product prior to application of a chemical adhesive called Bondurite (Photo 20 in Attachment A).

Mr. Frantz proceeded to turn on power inside the former paint room. Mr. Frantz guided the EPA Inspection Team into the coater room, where the group observed a paint coater apparatus with two bridal rollers located on the bottom floor of the multi-story unit (Photo 22 in Attachment A). Inspection information indicated that the painting operation was housed over

five floors, with each floor having a designated task in the operation. According to Mr. Frantz, the second and third floors of this unit were used for heat induction, the fourth floor was a water jet, and the fifth floor housed a cooling tank when the painting line was in operation. Following the visit to the former paint room, Mr. Frantz and Mr. Rendfeld walked the EPA Inspection Team to the influent location for the coil line pickle rinse (Photo 23 in Attachment A). Information indicated that a now-decommissioned boiler had been used near this location. When in operation, the boiler was able to reclaim heat from the process.

The EPA Inspection Team and Facility staff proceeded to walk to the tube mill, where Mr. Rendfeld stated there were two tubing lines: one known as a small mill used to process $\frac{3}{4}$ " to 2" steel and another line to address larger-sized steel ranging from 2" to 4". Facility representatives began to describe to the EPA Inspection Team the tube mill processes being observed. From the uncoiler observed earlier, the EPA Inspection Team observed an end welder where Mr. Frantz stated pieces of steel are clamped and sheared into squares. Following the end welder that smooths the steel for additional processing, the accumulator collects the welded steel and directs it to the forming stand, where steel is shaped from flat to round. Walking through this process, inspectors proceeded to observe the first signs of a fluid at the induction welder, where steel is heated and multiple pieces are combined into one using electromagnetic processes (Photos 24 and 25 in Attachment A).

Mr. Frantz stated that the grates the EPA Inspection Team was walking on were part of the operation's secondary containment, and that any coolant spilled from the operation is directed into the 5,600-gallon cooling basin (Photo 27 in Attachment A). Inspectors continued to walk down the tube mill processing line to observe where tubes are cooled (Photo 26 in Attachment A). Once in the shipping section of the Facility, Mr. Frantz indicated that tubes become finished products once cut by a saw. Mr. Frantz also elucidated that the mill coolant is managed and recycled from the basin using a reverse osmotic process due to impurities, adding that there is a pipe with a weir to direct liquid back into the system and that solid residuals settle into the bottom of the basin. Inspection information and provided manifests indicate that solid residuals is designated as non-hazardous special waste that is disposed of at Indian Creek Landfill. Mr. Frantz also indicated that any water used for power washing this area would be contained within the closed system as well.

Following this discussion, the EPA Inspection Team walked through a portion of the Facility's shipping section where large stacks of finished product were being housed for shipment. Mr. Frantz indicated that a train had recently run into the loading dock door, which had inhibited some of their planned deliveries. Following Mr. Rendfeld and Mr. Frantz, the EPA Inspection Team proceeded to walk between buildings, taking a "shortcut" by walking outside along the building's southern perimeter. During this walk, the EPA Inspection Team noticed a dumpster

filled with scrap metal without a cover. No other containers, drums, or equipment were observed outside during the time of the inspection.

Closing Conference

In the Facility office, Mr. Small began the closing conference at approximately 11:50 A.M. All members of the EPA Inspection Team were present for the closing conference, along with Mr. Rendfeld and Mr. Frantz. The EPA Inspection Team thanked both Facility representatives for their time and noted that any Areas of Concern noted would be highlighted in the subsequent report. EPA indicated that it would review the information it had requested when received. Mr. Small stated that EPA would develop an inspection report that summarized its inspection of the Facility and anticipated that it would provide a copy of the report in approximately 60 days to both Mr. Rendfeld and Mr. Frantz. The closing conference was ended at approximately 11:57 A.M., and the EPA Inspection Team exited Facility grounds at approximately 12:00 P.M.

DOCUMENTS REQUESTED DURING THE INSPECTION:

- A schematic of the Facility's wastewater treatment system
- Any records from discussion with Illinois EPA regarding expiration of wastewater treatment permit.
- Last three semi-annual pretreatment reports
- Last three solid waste invoices/waste manifests related to sludge
- Most recent stormwater pollution prevention plan
- Last three annual stormwater inspection reports
- A copy of the Facility stormwater permit
- A copy of the most recent Illinois EPA Water Pollution Control Permit
- Past three months of water bills

DOCUMENTS OBTAINED AFTER THE INSPECTION:

- "Proposed Wastewater Treatment System Upgrade," dated June 13, 2001
- Notes from discussion with Illinois EPA regarding expiration of wastewater treatment permit, dated January 11, 2022
- Letter from Hanna Steel to Illinois EPA regarding Wastewater Permit 2017-EO-62627, dated January 11, 2022
- Last three semi-annual pretreatment reports, dated June 2020, January 2021, and June 2021
- "Illinois EPA Annual Facility Inspection Report for NPDES Individual Permit for Storm Water Discharges Associated with Industrial Site Activities," dated January 15, 2024
- "Illinois EPA Annual Facility Inspection Report for NPDES Individual Permit for Storm Water Discharges Associated with Industrial Site Activities," dated January 30, 2023
- "Green For Life Environmental Invoice," dated October 31, 2022
- "Peoria Disposal Company Services, Inc. Receipt" dated October 25, 2022
- "Green For Life Environmental Invoice," dated September 30, 2023
- "Green For Life Environmental Invoice," dated October 20, 2023
- "Hanna Steel Corporation Pekin, Illinois Facility Stormwater Pollution Prevention Plan," date unknown (email from Mr. Frantz states it was last updated in 2022)

FILE REVIEW:

“Proposed Wastewater Treatment System Upgrade,” dated June 13, 2001

The inspector requested a copy of a proposed wastewater treatment system schematic. Mr. Frantz provided a schematic from 2001 produced by Randolph & Associates, Inc., a consulting firm in Peoria, Illinois. It is the inspector's understanding that this schematic represents the last upgrade of the pickling production line and treatment system prior to its decommission in 2021. According to the schematic, the production line and treatment system comprised the following wastewater equipment: two 300-gallon neutralization tanks, a 200-gallon flocculation tank, two 2,000-gallon clarifiers, four 150-gallon reagent chemical feeds, a main control panel with an ESCO sampler and cost reporter, a tank deck, an inspection deck, a 5-ft³ automatic filter press with a 630-mm. plate size, an 18,000-gallon emergency holding tank and flow equalization tank, a 150-gallon filter press cleaning tank, and a final flow meter consisting of a totalizer and recorder with a 30 gallon-per-minute maximum reading.

Notes from discussion with Illinois EPA regarding expiration of wastewater treatment permit, dated January 11, 2022

Below this letter, Mr. Frantz provided the inspector with notes from a conversation with an Illinois EPA representative suggesting that they should let the permit expire, not need to send a report, and no fees would be assessed.

Letter from Hanna Steel to Illinois EPA regarding Wastewater Permit 2017-EO-62627, dated January 11, 2022

Mr. Frantz provided the inspector with a letter to the City of Pekin dated January 11, 2022 stating that Hanna Steel is no longer discharging process wastewater to the City of Pekin and has not done so since a final tank clean up in October of 2021.

Last three semi-annual pretreatment reports, dated June 2020, January 2021, and June 2021

Mr. Frantz emailed the inspector the last three semi-annual self-monitoring reports dated June 25, 2020, January 5, 2021, and June 23, 2021. The reports showed that the Facility discharged between five and seven times a month, with discharges ranging from 3,874 to 18,609 gallons over the three months reported. The document also showed how calculated results compared to reported limits for cyanide (total), chromium (total), and zinc. Analytical results from PDC Labs were also provided at the end of each report with no noted qualifiers.

“Illinois EPA Annual Facility Inspection Report for NPDES Individual Permit for Storm Water Discharges Associated with Industrial Site Activities,” dated January 15, 2024

The inspector reviewed the 2023 Annual Report, also stating that Hanna Steel did not experience any spills that resulted in pollutants being discharged into stormwater runoff. As with the 2022 Annual Report, Mr. Frantz is the contact person noted for the Facility. The attached weekly joint inspection report shares the same questions and characteristics as the 2022 report and was filled out on January 15, 2024. In the email containing this submission, Mr. Frantz added that stormwater inspections were performed in conjunction with RCRA inspections, as he was under the impression that one seemed conditioned to the other. Mr. Frantz also said that the annual reports were the only inspections where stormwater was evaluated independent of RCRA. In the email, Mr. Frantz stated that joint inspections were performed in December 2023 and January 2024 -- with the January 2024 inspection attached -- despite all hazardous waste including bulk paint, solvent, and other chemicals on site being shipped off-site on October 24, 2023.

“Illinois EPA Annual Facility Inspection Report for NPDES Individual Permit for Storm Water Discharges Associated with Industrial Site Activities,” dated January 30, 2023

The inspector reviewed the 2022 Annual Report, stating that no spills had occurred in 2022 leading to pollutants being discharged into stormwater runoff. A weekly joint inspection report noted as covering both stormwater and RCRA with a date of January 5, 2023 was also attached to this submission that assessed paint storage areas, waste storage areas, chemical storage and loading/unloading areas, and hydrochloric acid loading/unloading areas. Questions within the weekly inspection document address cleanliness and accessibility of chemical storage areas, proper storage and labeling, and signs of spills.

“Green For Life Environmental Invoice,” dated October 31, 2022, September 30, 2023, and October 20, 2023

The inspector requested and reviewed the last three manifests for sludge and wastewater cakes the Facility had produced. Mr. Frantz provided the last three sludge invoices (with tonnage) that contained the following pickup dates: October 25, 2022 (17.63 Tons) September 30, 2023 (13.06 Tons), and October 11, 2023 (16.77 Tons). Per GFL Environmental invoices, this waste was categorized as non-special waste. Mr. Frantz added in the email that the non-special waste entailed tube mill sludge and historically wastewater cakes from the pickling line. Information indicates that the tonnage was transported and scaled at the Indian Creek Landfill, located in rural Tazewell County.

“Peoria Disposal Company Services, Inc. Receipt” dated October 25, 2022

An additional invoice from the former Peoria Disposal Company (PDC) for a dump and exchange of a roll-off service container was provided by Mr. Frantz that coincides with the 2022 sludge invoice.

“Notice of Renewal – General Storm Water Permit for Industrial Site Activities,” dated August 4, 2023

Based on the Notice of Renewal provided by Illinois EPA to the inspector, Hanna Steel's General Storm Water Permit for Industrial Site Activities was renewed on August 4, 2023. Based on information in this letter, Hanna Steel has maintained a General NPDES Permit for stormwater since October 14, 1998.

“Hanna Steel Corporation Pekin, Illinois Facility Stormwater Pollution Prevention Plan,” date unknown (email from Mr. Frantz states document is from 2022)

Due to the stormwater permit being outside of the scope of this inspection, this document was received but has not been fully evaluated.

AREAS OF CONCERN:

EPA has identified areas of concern based on findings during the inspection of Hanna Steel as well as from a post-inspection review of the information provided to EPA by Facility representatives. An enumerated list of the areas of concern are listed below:

1. Uncovered scrap metal dumpster in parking lot: During the inspection, the EPA Inspection Team observed a dumpster with scrap metal located in the south portion of the parking lot, delineated in the SWPPP map as the waste storage area. As a best management practice noted in the SWPPP inspection checklist (found in Section 5.3.1: Waste Storage Area of the SWPPP) this dumpster should be properly covered to reduce any potential stormwater runoff or windblown debris.
2. Stormwater inspections: In the email containing follow-up documentation, Mr. Frantz indicated that stormwater inspections were conducted jointly as RCRA inspections. Since the Facility has recently become a Very Small Quantity Generator with the removal of the paint line, Mr. Frantz indicated that RCRA inspections of hazardous waste containers are no longer required. As stormwater inspection are still required according to the General Stormwater Permit and SWPPP, the provided checklist for the annual stormwater inspections should be amended to clearly reflect the ongoing inspection checklist and requirements under the Clean Water Act.

LIST OF ATTACHMENTS:

- A. Photograph Log
- B. Inspection Sign-In Sheet
- C. “Proposed Wastewater Treatment System Upgrade,” dated June 13, 2001
- D. Notes from discussion with Illinois EPA regarding expiration of wastewater treatment permit, dated January 11, 2022
- E. Letter from Hanna Steel to Illinois EPA regarding Wastewater Permit 2017-EO-62627, dated January 11, 2022
- F. Last three semi-annual pretreatment reports, dated June 2020, January 2021, and June 2021
- G. “Illinois EPA Annual Facility Inspection Report for NPDES Individual Permit for Storm Water Discharges Associated with Industrial Site Activities,” dated January 15, 2024
- H. “Illinois EPA Annual Facility Inspection Report for NPDES Individual Permit for Storm Water Discharges Associated with Industrial Site Activities,” dated January 30, 2023
- I. “Green For Life Environmental Invoice,” dated October 31, 2022
- J. “Peoria Disposal Company Services, Inc. Receipt” dated October 25, 2022
- K. “Green For Life Environmental Invoice,” dated September 30, 2023
- L. “Green For Life Environmental Invoice,” dated October 20, 2023
- M. “Notice of Renewal – General Storm Water Permit for Industrial Site Activities,” dated August 4, 2023
- N. “Hanna Steel Corporation Pekin, Illinois Facility Stormwater Pollution Prevention Plan,” date unknown (email from Mr. Frantz states 2022)

Attachment A

Hanna Steel - Pekin Division Plant #7

EPA Inspection Date: 02/29/2024

All photos taken by Newton Ellens, Environmental Engineer, U.S. EPA

Camera: Cannon Power Shot SX, 230HS



1: IMG_0536

Description: Break room floor drain

Location: Facility break room

Camera Direction: n/a

Date/Time: 02/29/2024



2: IMG_0537

Description: Bay two north wall influent

Location: Paint line area

Camera Direction: n/a

Date/Time: 02/29/2024



3: IMG_0538

Description: Entry uncoiler

Location: Paint line area

Camera Direction: n/a

Date/Time: 02/29/2024



4: IMG_0539

Description: Filter press

Location: Paint line area

Camera Direction: n/a

Date/Time: 02/29/2024



5: IMG_0540

Description: Clarifier 1 for former pickling rise wastewater (older clarifier)

Location: Paint line area

Camera Direction: n/a

Date/Time: 02/29/2024



6: IMG_0541

Description: Clarifier 2 for former pickling rinse wastewater (newer clarifier)

Location: Paint line area

Camera Direction: n/a

Date/Time: 02/29/2024



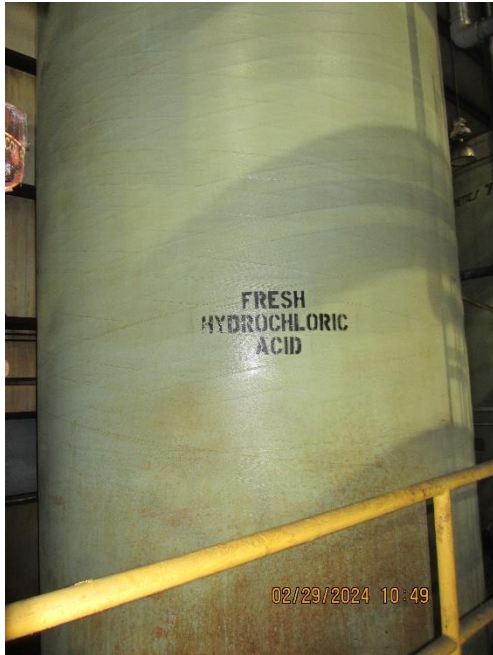
7: IMG_0542

Description: Spent hydrogen chloride (18% by volume) tank

Location: Paint line area

Camera Direction: n/a

Date/Time: 02/29/2024



8: IMG_0543

Description: Fresh hydrogen chloride tank

Location: Paint line area

Camera Direction: n/a

Date/Time: 02/29/2024



9: IMG_0544

Description: Recirculating acid tank #1

Location: Paint line area

Camera Direction: n/a

Date/Time: 02/29/2024



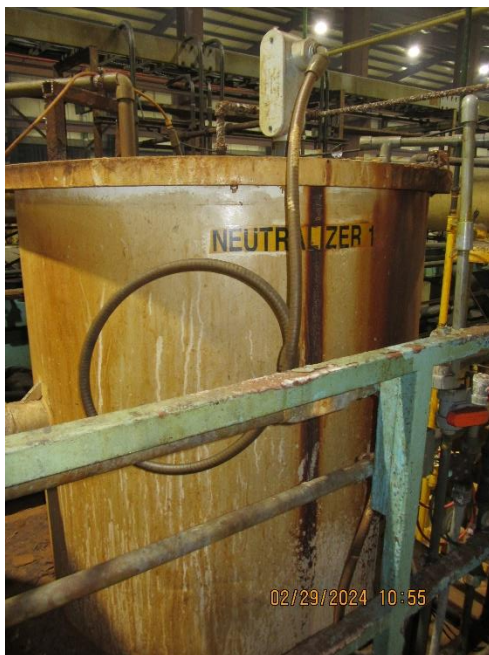
10: IMG_0545

Description: Control panel for wastewater treatment system

Location: Paint line area

Camera Direction: n/a

Date/Time: 02/29/2024



11: IMG_0546

Description: Neutralizer Tank #1

Location: Paint line area

Camera Direction: n/a

Date/Time: 02/29/2024



12: IMG_0547

Description: Neturalizer Tank #2

Location: Paint line area

Camera Direction: n/a

Date/Time: 02/29/2024



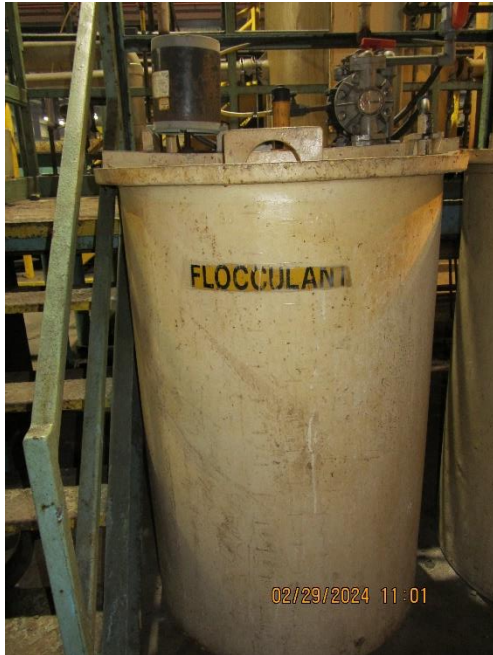
13: IMG_0548

Description: GLS automatic sampler and discharge pipe

Location: Paint line area

Camera Direction: n/a

Date/Time: 02/29/2024



14: IMG_0549

Description: Flocculant tank for wastewater treatment system

Location: Paint line area

Camera Direction: n/a

Date/Time: 02/29/2024



15: IMG_0550

Description: Water supply tank for wastewater treatment system

Location: Paint line area

Camera Direction: n/a

Date/Time: 02/29/2024



16: IMG_0551

Description: One of two caustic supply tank for wastewater treatment system

Location: Paint line area

Camera Direction: n/a

Date/Time: 02/29/2024



17: IMG_0552

Description: Second of two caustic supply tank for wastewater treatment system

Location: Paint line area

Camera Direction: n/a

Date/Time: 02/29/2024



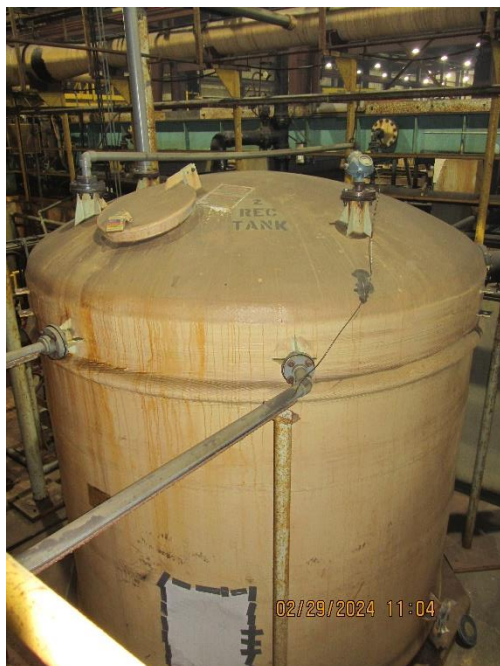
18: IMG_0553

Description: Caustic soda sign located above casutic soda tanks

Location: Paint line area

Camera Direction: n/a

Date/Time: 02/29/2024



19: IMG_0554

Description: Recirculating acid tank #2

Location: Paint line area

Camera Direction:

Date/Time: 02/29/2024



20: IMG_0555

Description: Four-section water rinse

Location: Paint line area

Camera Direction: n/a

Date/Time: 02/29/2024



21: IMG_0556

Description: Pretreatment chemical additive (right) and leveler (left)

Location: Paint line area

Camera Direction: n/a

Date/Time: 02/29/2024



22: IMG_0557

Description: Paint coater in paint room

Location: Paint line area

Camera Direction:

Date/Time: 02/29/2024



23: IMG_0558

Description: Influent for coil line pickle rinse

Location: Tube mill area

Camera Direction: n/a

Date/Time: 02/29/2024



24: IMG_0559

Description: Mill working fluid running off of equipment into secondary containment

Location: Tube mill area

Camera Direction: n/a

Date/Time: 02/29/2024



25: IMG_0560

Description: Induction coil for tube mill

Location: Tube mill area

Camera Direction: n/a

Date/Time: 02/29/2024



26: IMG_0561

Description: Cooling trough

Location: Tube mill area

Camera Direction: n/a

Date/Time: 02/29/2024



27: IMG_0562

Description: Coolant tank associated with tube milling activity

Location: Tube mill area

Camera Direction: n/a

Date/Time: 02/29/2024

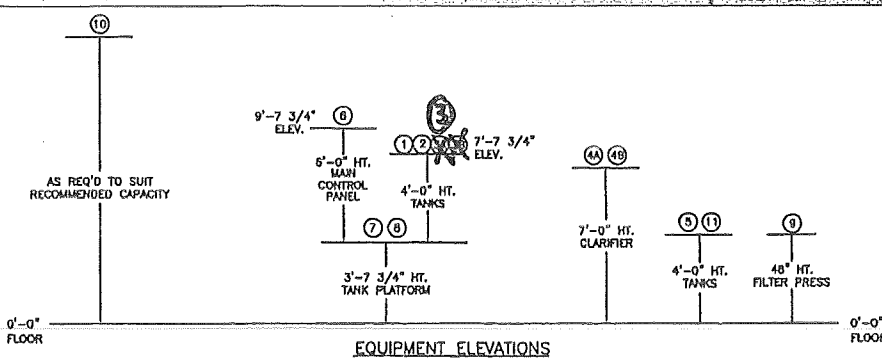
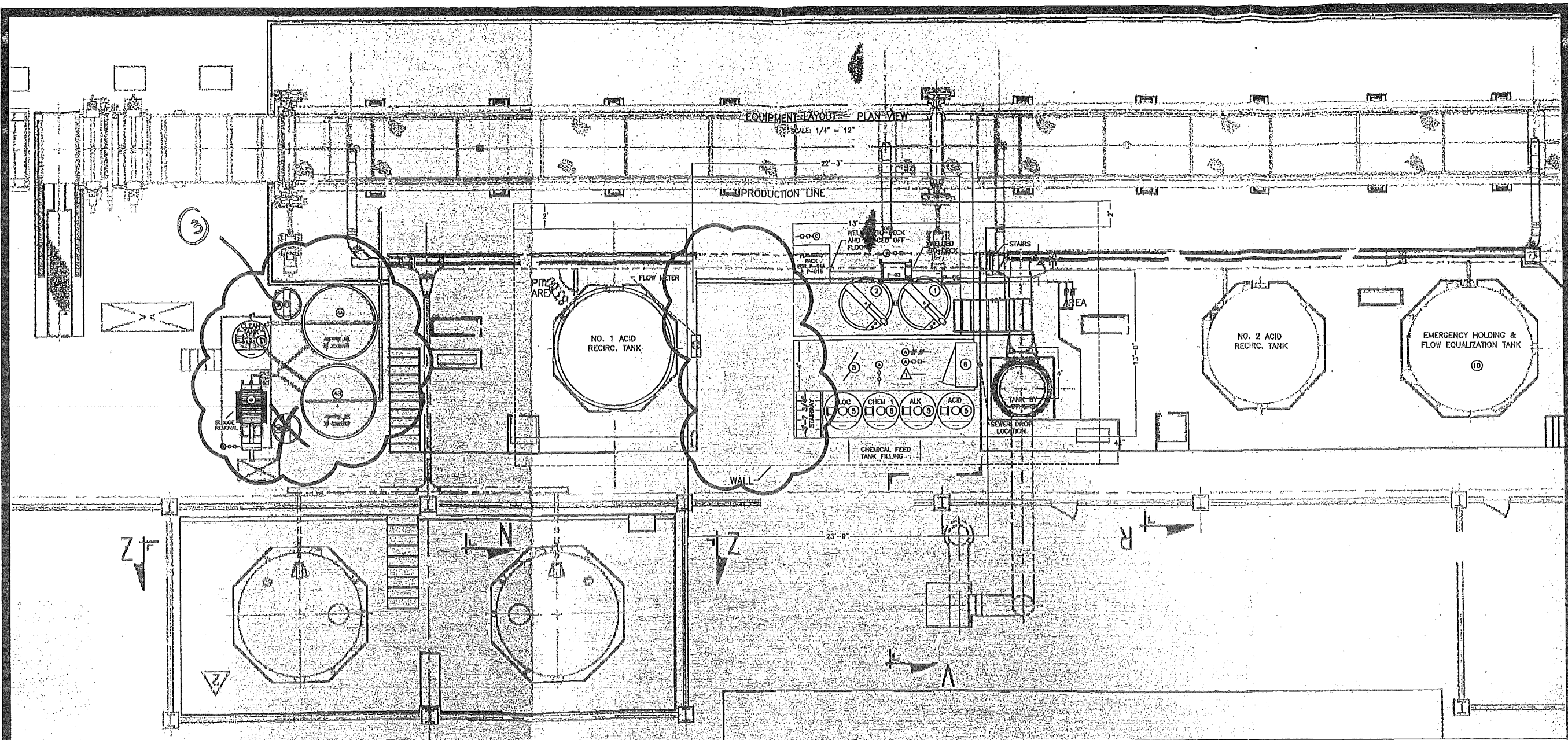
Location

2/24/2024

Pekin, IL

Participants

[illegible]



UTILITY REQUIREMENTS:

THE FOLLOWING UTILITIES SHALL BE SUPPLIED, INSTALLED & DROPPED TO SPECIFIC DEVICES BY CUSTOMER AS NOTED.

ELECTRICAL SERVICE:

- ① MAIN CONTROL PANEL
480 VOLTS/30 AMPS/3 PHASE/60 HERTZ W/EARTH GROUND
120 VOLTS/40 AMPS/1 PHASE/60 HERTZ W/EARTH GROUND

COMPRESSED AIR SUPPLY:

- 70 CFM @ 100 PSI W/REGULATOR AND FILTER (TOTAL). (DRY AIR PROTECTED TO 40° F PRESSURE DEWPOINT LEVEL)
- ④ MAIN CONTROL PANEL 5 CFM @ 80 PSI
- ⑤ FILTER PRESS FEED PUMP 20 CFM @ 100 PSI
- ⑥ MAIN FEED PUMP 20 CFM @ 40 PSI
- ⑦ FILTER PRESS RASH 25 CFM @ 100 PSI

JAWWATER SUPPLY:

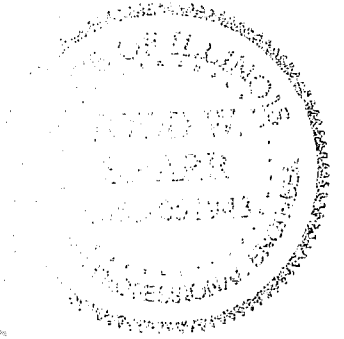
- 1" DIAMETER LINE W/AREA APPROVED BACKFLOW PREVENTER, PRESSURE REGULATOR, & SHUT-OFF VALVE.
- ③ CHEMICAL FEED TANKS

TELEPHONE SERVICE:

A VOICE GRADE DIAL-UP TELEPHONE LINE SHALL BE INSTALLED IN DMP'S MAIN CONTROL PANEL (NON-SWITCHBOARD). CUSTOMER SHALL PLACE DMP'S WASTEWATER TREATMENT EQUIPMENT IN ITS APPROXIMATE LOCATION PRIOR TO THE ARRIVAL OF DMP'S INSTALLATION CREW.

EQUIPMENT SCHEDULE:

- ① NEUTRALIZATION TANK N-1; OVF-45-330 GALS. x 4'-0" HT.
- ② NEUTRALIZATION TANK N-2; OVF-45-330 GALS. x 4'-0" HT.
- ③ FLOCCULATION TANK; OVF-31-150 GALS. x 4'-0" HT. ~~ORV-31-200 GALS. x 4'-0" HT.~~
- ④ & ⑤ CLARIFIER; OVF-84-2,000 GALS. x 7'-0" HT. EA.
- ⑥ (4) REAGENT CHEMICAL FEED TANKS; OVF-31-150 GALS. x 48" HT.
- ⑦ DMP E-CONTROLLER 10 MAIN CONTROL PANEL; 24" DP. x 42" WD. x 72" HT. W/ESCO & COST REPORTER
- ⑧ TANK DECK; 5'-0" WD. x 13'-4" LG. x 3'-7 3/4" HT.
- ⑨ INSPECTION DECK; 4'-0" WD. x 14'-4" LG. x 3'-7 3/4" HT.
- ⑩ 5 CU. FT. AUTOMATIC FILTER PRESS 630mm PLATE SIZE
- ⑪ EMERGENCY HOLDING TANK & FLOW EQUALIZATION TANK; 18,000 GALS. (FRP) (BY OTHERS)
- ⑫ FILTER PRESS CLEANING TANK; OVF-31-150 GALS. x 48" HT.
- ⑬ FINAL FLOW METER W/TOTALIZER & RECORDER 30 GPM MAXIMUM



PROPOSED WASTEWATER TREATMENT SYSTEM UPGRADE

HANNA STEEL — PEKIN, ILLINOIS

Page: 1 OF 1

Info:

Randolph & Associates, Inc.
 911 W. PIONEER PARKWAY, PEORIA, IL 61615-2124
 Tel. 309-693-8844 Fax. 309-693-6555 • 1-800-831-9221
<http://www.RANDOLPHinc.com>
 Consulting Engineers • Land Surveyors

Scale: NO SCALE	Proj. No.: 257.012
By: T. SNARR	Date: 6/13/01

WW Set To Expire OCT 31, 2022

Per Phone Conversation with EPA - Mike Kallen
(217) 785-6797

let expire -

Pay No Fees -

Send no Report -

< will DRAFT email To City of Peoria - MGR
Notice of End of WW

1/11/2022

DD

EPA

Mike Kallen

217-785

6797





Hanna Steel Corporation

Corporate Office
4527 Southlake Parkway
Hoover, AL. 35244

Hanna Steel Corporation, Pekin
220 Hanna Drive
Pekin, IL 61554
Tel (309) 478-3800
Fax (309) 478-3810

January 11, 2022

City of Pekin
Attn: City Manager: Mark Rothert
111 S. Capitol Street
Pekin, Illinois, 61554

Re: Waste Water Permit 2017-EO-62627

Dear Mr. Rothert,

Hanna Steel Pekin Plant has ended our paint process line as of last April, 2021 and subsequently, the waste water system as well. I have notified the IEPA that we will not renew our waste water permit prior to the expiration of our current permit which expires October 31, 2022. We have not generated any waste water since the final tank clean up October, 2021 and will not generate any going forward. We will continue to slit coils and manufacture steel tubing for the foreseeable future.

If you should have any questions or I can be of further assistance please contact me at (309) 478-3800.

Sincerely,

A handwritten signature in black ink, appearing to read "D. Frantz", with a long horizontal line extending to the right.

David Frantz
Env. / Safety Coordinator
Hanna Steel Corporation
Pekin, IL, 61554
dfrantz@hannasteel.com

HANNA

June 25, 2020

U.S. Environmental Protection Agency
Pretreatment Enforcement Manager &
Water Enforcement and Compliance
WUC-15J
77 Jackson Boulevard
Chicago, Illinois 60604-3590

RE: Semi-Annual Report for Permit 2017-EO-62627

Dear Branch Chief

Please find enclosed the semi-annual report for lab analysis and effluent flows for the month of June from Hanna Steel Corporations Industrial Wastewater System. The effluent sample was pulled on January 7, 2020. As you can see the lab results are in mg/l and I have converted them to lbs/per day on my report/flow sheet.

If you should have any questions please contact me at (309) 478-3805.

Sincerely,
Hanna Steel Corporation

David Frantz
Env. / Safety Coordinator
DFrantz@hannasteel.com

Hanna Steel Corporation

Corporate Offices
4527 Southlake
Parkway
Hoover, Alabama
35244

Hanna Steel, Pekin
220 Hanna Drive
Pekin, Illinois 61554
TEL (309) 478-3800
FAX (309) 478-3810

Revision: A
Date: 1/27/04

**Hanna Steel Corporation-Pekin
Industrial Wastewater Facility**

Effluent Flow's For The Month Of: JANUARY 2020

Date	Beginning	End	Total	Days Ran
1			0	
2			0	
3			0	
4			0	
5			0	
6	2499385	2511478	12093	1
7	2511478	2521478	10000	1
8	2521478	2534752	13274	1
9			0	
10			0	
11			0	
12			0	
13			0	
14			0	
15			0	
16			0	
17			0	
18			0	
19			0	
20			0	
21	2534752	2548333	13581	1
22	2548333	2555570	7237	1
23			0	
24			0	
25			0	
26			0	
27			0	
28			0	
29			0	
30			0	
31			0	

Monthly Total

56185

5

Average Daily Flow
Page 1 of 1

11237.00

Limits

Pollutant	1-Day Max. (lbs/day)	Mo. Avg. (lbs per day)
Cyanide (Total)	0.2	0.08
Chromium (Total)	0.29	0.12
Zinc	0.92	0.04

Actual

	1-Day Max. (lbs/day)	Mo. Avg. (lbs per day)
Cyanide (Total)	0.00005	0.0023
Chromium (Total)	0.00005	0.0023
Zinc	0.0091	0.0379



ANALYTICAL RESULTS

Sample: 0010769-01
Name: EFFLUENT COMPOSITE
Matrix: Waste Water - Composite

Sampled: 01/07/20 08:30
Received: 01/07/20 12:00
PO #: 194302

Parameter	Result	Unit	Qualifier	Prepared	Dilution	MRL	Analyzed	Analyst	Method
Total Metals - PIA									
Chromium	< 0.0050	mg/L		01/08/20 13:15	1	0.0050	01/14/20 15:25	ZSA	EPA 200.7 REV 4.4
Zinc	0.081	mg/L		01/08/20 13:15	1	0.010	01/14/20 15:25	ZSA	EPA 200.7 REV 4.4

Sample: 0010769-02
Name: EFFLUENT GRAB
Matrix: Waste Water - Grab

Sampled: 01/07/20 08:35
Received: 01/07/20 12:00
PO #: 194302

Parameter	Result	Unit	Qualifier	Prepared	Dilution	MRL	Analyzed	Analyst	Method
General Chemistry - PIA									
Cyanide	< 0.0050	mg/L		01/14/20 07:32	1	0.0050	01/14/20 14:34	PMN	EPA 335.4 REV1



NOTES

Specifications regarding method revisions and method modifications used for analysis are available upon request. Please contact your project manager.

* Not a TNI accredited analyte

Certifications

CHI - McHenry, IL - 4314 W Crystal Lake Road A, McHenry, IL 60050

TNI Accreditation for Drinking Water, Wastewater, Fields of Testing through IL EPA Lab No. 100279

Illinois Department of Public Health Bacteriological Analysis in Drinking Water Approved Laboratory Registry No. 17556

PIA - Peoria, IL - 2231 W Altorfer Drive, Peoria, IL 61615

TNI Accreditation for Drinking Water, Wastewater, Hazardous and Solid Wastes Fields of Testing through IL EPA Lab No. 100230

Illinois Department of Public Health Bacteriological Analysis in Drinking Water Approved Laboratory Registry No. 17553

Drinking Water Certifications: Iowa (240); Kansas (E-10338); Missouri (870)

Wastewater Certifications: Arkansas (88-0677); Iowa (240); Kansas (E-10338)

Hazardous/Solid Waste Certifications: Arkansas (88-0677); Iowa (240); Kansas (E-10338)

SPIL - Springfield, IL - 1210 Capitol Airport Drive, Springfield, IL 62707

TNI Accreditation through IL EPA Lab No. 100323

SPMO - Springfield, MO - 1805 W Sunset Street, Springfield, MO 65807

USEPA DMR-QA Program

STL - St. Louis, MO - 3278 N Highway 67, Florissant, MO 63033

TNI Accreditation for Wastewater, Hazardous and Solid Wastes Fields of Testing through KS Lab No. E-10389

TNI Accreditation for Wastewater, Hazardous, and Solid Waste Analysis through IL EPA No. 200080

Illinois Department of Public Health Bacteriological Analysis in Drinking Water Approved Laboratory Registry No. 171050

Missouri Department of Natural Resources

Microbiological Laboratory Service for Drinking Water



Certified by: Janet Clutters, Project Manager



PDC LABORATORIES, INC.
WWW.PDCLAB.COM

REGULATORY PROGRAM (Check one)		NPDES	☐
MORBCA	☐	RCRA	☐
CCDD	☐	TACO: RES OR INDCOMM	☐

CHAIN OF CUSTODY RECORD
STATE WHERE SAMPLE COLLECTED _____

ALL HIGHLIGHTED AREAS MUST BE COMPLETED BY CLIENT (PLEASE PRINT)

1 CLIENT Hanna Steel Corporation		PROJECT NUMBER		PROJECT LOCATION		PURCHASE ORDER #		3 ANALYSIS REQUESTED		4 (FOR LAB USE ONLY) LOGIN # 0616769-2 LOGGED BY: bly													
ADDRESS 220 Hanna Dr		PHONE NUMBER 478-3805		E-MAIL dfrantz@hannasteel.com		DATE SHIPPED				CLIENT: Hanna Steel Corp PROJECT MGR: Janet Clutters CUSTODY SEAL #:													
CITY Pekin IL 61555		SAMPLED (PLEASE PRINT) David Frantz		SIGNATURE (PLEASE PRINT) David Frantz		MATRIX TYPES: NO. 1 - WASTEWATER NO. 2 - WASTEWATER NO. 3 - WASTEWATER NO. 4 - WASTEWATER NO. 5 - WASTEWATER NO. 6 - WASTEWATER NO. 7 - WASTEWATER NO. 8 - WASTEWATER NO. 9 - WASTEWATER NO. 10 - WASTEWATER NO. 11 - WASTEWATER NO. 12 - WASTEWATER NO. 13 - WASTEWATER NO. 14 - WASTEWATER NO. 15 - WASTEWATER NO. 16 - WASTEWATER NO. 17 - WASTEWATER NO. 18 - WASTEWATER NO. 19 - WASTEWATER NO. 20 - WASTEWATER NO. 21 - WASTEWATER NO. 22 - WASTEWATER NO. 23 - WASTEWATER NO. 24 - WASTEWATER NO. 25 - WASTEWATER NO. 26 - WASTEWATER NO. 27 - WASTEWATER NO. 28 - WASTEWATER NO. 29 - WASTEWATER NO. 30 - WASTEWATER NO. 31 - WASTEWATER NO. 32 - WASTEWATER NO. 33 - WASTEWATER NO. 34 - WASTEWATER NO. 35 - WASTEWATER NO. 36 - WASTEWATER NO. 37 - WASTEWATER NO. 38 - WASTEWATER NO. 39 - WASTEWATER NO. 40 - WASTEWATER NO. 41 - WASTEWATER NO. 42 - WASTEWATER NO. 43 - WASTEWATER NO. 44 - WASTEWATER NO. 45 - WASTEWATER NO. 46 - WASTEWATER NO. 47 - WASTEWATER NO. 48 - WASTEWATER NO. 49 - WASTEWATER NO. 50 - WASTEWATER NO. 51 - WASTEWATER NO. 52 - WASTEWATER NO. 53 - WASTEWATER NO. 54 - WASTEWATER NO. 55 - WASTEWATER NO. 56 - WASTEWATER NO. 57 - WASTEWATER NO. 58 - WASTEWATER NO. 59 - WASTEWATER NO. 60 - WASTEWATER NO. 61 - WASTEWATER NO. 62 - WASTEWATER NO. 63 - WASTEWATER NO. 64 - WASTEWATER NO. 65 - WASTEWATER NO. 66 - WASTEWATER NO. 67 - WASTEWATER NO. 68 - WASTEWATER NO. 69 - WASTEWATER NO. 70 - WASTEWATER NO. 71 - WASTEWATER NO. 72 - WASTEWATER NO. 73 - WASTEWATER NO. 74 - WASTEWATER NO. 75 - WASTEWATER NO. 76 - WASTEWATER NO. 77 - WASTEWATER NO. 78 - WASTEWATER NO. 79 - WASTEWATER NO. 80 - WASTEWATER NO. 81 - WASTEWATER NO. 82 - WASTEWATER NO. 83 - WASTEWATER NO. 84 - WASTEWATER NO. 85 - WASTEWATER NO. 86 - WASTEWATER NO. 87 - WASTEWATER NO. 88 - WASTEWATER NO. 89 - WASTEWATER NO. 90 - WASTEWATER NO. 91 - WASTEWATER NO. 92 - WASTEWATER NO. 93 - WASTEWATER NO. 94 - WASTEWATER NO. 95 - WASTEWATER NO. 96 - WASTEWATER NO. 97 - WASTEWATER NO. 98 - WASTEWATER NO. 99 - WASTEWATER NO. 100 - WASTEWATER		DATE COLLECTED 1-7-20		TIME COLLECTED 8:30 AM		SAMPLE TYPE X		MATRIX TYPE WW		BOTTLE COUNT 1		PRESS CODE Cr & Zn		CN-T		REMARKS	
CONTACT PERSON David Frantz		DATE COLLECTED 1-7-20		TIME COLLECTED 8:35 AM		SAMPLE TYPE X		MATRIX TYPE WW		BOTTLE COUNT 1		PRESS CODE X		CN-T		REMARKS							
SAMPLE DESCRIPTION (PLEASE PRINT) Effluent Comp		DATE COLLECTED 1-7-20		TIME COLLECTED 8:35 AM		SAMPLE TYPE X		MATRIX TYPE WW		BOTTLE COUNT 1		PRESS CODE X		CN-T		REMARKS							
SAMPLE DESCRIPTION (PLEASE PRINT) Effluent Grab		DATE COLLECTED 1-7-20		TIME COLLECTED 8:35 AM		SAMPLE TYPE X		MATRIX TYPE WW		BOTTLE COUNT 1		PRESS CODE X		CN-T		REMARKS							
CHEMICAL PRESERVATION CODES: 1 - HCL 2 - H2SO4 3 - HNO3 4 - NAOH 5 - NA2S2O3 6 - UNPRESERVED 7 - OTHER		TURNAROUND TIME REQUESTED (PLEASE CHECK) (RUSH TAT IS SUBJECT TO PDC LABS APPROVAL AND SURCHARGE) NORMAL ☒ RUSH ☐		DATE RESULTS NEEDED		5 - UNPRESERVED		7 - OTHER		PROCEDURE WITH ANALYSIS AND QUALITY RESULTS: (PRINT)		COMMENTS: (FOR LAB USE ONLY)		SAMPLE TEMPERATURE UPON RECEIPT 43 °C		CHILL PROCESS STARTED PRIOR TO RECEIPT SAMPLE(S) RECEIVED ON ICE SAMPLE ACCEPTANCE NONCONFORMANT REPORTS NEEDED DATE AND TIME TAKEN FROM SAMPLE BOTTLE 4-3-20							
5 RUSH RESULTS VIA (PLEASE CHECK) EMAIL ☐ PHONE ☐		EMAIL IF DIFFERENT FROM ABOVE: PHONE IF DIFFERENT FROM ABOVE:		7 RELINQUISHED BY: (SIGNATURE) [Signature]		DATE 1-7-20		TIME 11:10		RECEIVED BY: (SIGNATURE) [Signature]		DATE 1-7-20		TIME 11:10		RECEIVED BY: (SIGNATURE) [Signature]		DATE 1-7-20		TIME 11:10			
7 RELINQUISHED BY: (SIGNATURE) [Signature]		DATE 1-7-20		TIME 11:10		RECEIVED BY: (SIGNATURE) [Signature]		DATE 1-7-20		TIME 11:10		RECEIVED BY: (SIGNATURE) [Signature]		DATE 1-7-20		TIME 11:10		RECEIVED BY: (SIGNATURE) [Signature]		DATE 1-7-20		TIME 11:10	
RELINQUISHED BY: (SIGNATURE) [Signature]		DATE 1-7-20		TIME 11:10		RECEIVED BY: (SIGNATURE) [Signature]		DATE 1-7-20		TIME 11:10		RECEIVED BY: (SIGNATURE) [Signature]		DATE 1-7-20		TIME 11:10		RECEIVED BY: (SIGNATURE) [Signature]		DATE 1-7-20		TIME 11:10	

HANNA

January 5, 2021

U.S. Environmental Protection Agency
Pretreatment Enforcement Manager &
Water Enforcement and Compliance
WUC-15J
77 Jackson Boulevard
Chicago, Illinois 60604-3590

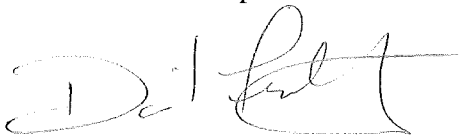
RE: Semi-Annual Report for Permit 2017-EO-62627

Dear Branch Chief

Please find enclosed the semi-annual report for lab analysis and effluent flows for the month of June from Hanna Steel Corporations Industrial Wastewater System. The effluent sample was pulled on June 23, 2020. As you can see the lab results are in mg/l and I have converted them to lbs/per day on my report/flow sheet.

If you should have any questions please contact me at (309) 478-3805.

Sincerely,
Hanna Steel Corporation



David Frantz
Env. / Safety Coordinator
Dfrantz@hannasteel.com

Hanna Steel Corporation

Corporate Offices
4527 Southlake
Parkway
Hoover, Alabama
35244

Hanna Steel, Pekin
220 Hanna Drive
Pekin, Illinois 61554
TEL (309) 478-3800
FAX (309) 478-3810

Revision: A
Date: 1/27/04

**Hanna Steel Corporation-Pekin
Industrial Wastewater Facility**

Effluent Flow's For The Month Of: JUNE 2020

Date	Beginning	End	Total	Days Ran
1	2783775	2783775	0	
2			0	
3			0	
4	2783775	2800305	16530	1
5			0	
6			0	
7			0	
8			0	
9			0	
10	2800305	2818914	18609	1
11	2818914	2822491	3577	1
12			0	
13			0	
14			0	
15			0	
16	2822491	2827330	4839	1
17	2827330	2840394	13064	1
18			0	
19			0	
20			0	
21			0	
22			0	
23	2840394	2853394	13000	1
24			0	
25			0	
26			0	
27			0	
28			0	
29			0	
30	2853394	2863575	10181	1
31			0	

Monthly Total

79800

7

Average Daily Flow

11400.00

Page 1 of 1

Limits

Pollutant	1-Day Max. (lbs/day)	Mo. Avg. (lbs per day)
Cyanide (Total)	0.2	0.08
Chromium (Total)	0.29	0.12
Zinc	0.92	0.04

Actual

	1-Day Max. (lbs/day)	Mo. Avg. (lbs per day)
Cyanide (Total)	0.0008	0.0033
Chromium (Total)	0.0008	0.0033
Zinc	0.0186	0.0799



ANALYTICAL RESULTS

Sample: 0064708-01

Name: EFFLUENT COMPOSITE

Matrix: Waste Water - Composite

Sampled: 06/23/20 09:35

Received: 06/23/20 11:10

PO #: 194302

Parameter	Result	Unit	Qualifier	Prepared	Dilution	MRL	Analyzed	Analyst	Method
Total Metals - PIA									
Chromium	< 0.0050	mg/L		06/24/20 10:30	1	0.0050	06/26/20 11:27	ZSA	EPA 200.7 REV 4
Zinc	0.12	mg/L		06/24/20 10:30	1	0.020	06/26/20 11:27	ZSA	EPA 200.7 REV 4

Sample: 0064708-02

Name: EFFLUENT GRAB

Matrix: Waste Water - Grab

Sampled: 06/23/20 09:37

Received: 06/23/20 11:10

PO #: 194302

Parameter	Result	Unit	Qualifier	Prepared	Dilution	MRL	Analyzed	Analyst	Method
General Chemistry - PIA									
Cyanide	< 0.0050	mg/L	Q3	06/29/20 08:08	1	0.0050	06/30/20 11:47	AMM	EPA 335.4 REV 1



2006

ROR, A.

TALCO: RES OR IND/COMM

CHAIN OF CUSTODY RECORD

STATE WHERE SAMPLE COLLECTED

[illegible]

HANNA

June 23, 2021

U.S. Environmental Protection Agency
Pretreatment Enforcement Manager &
Water Enforcement and Compliance
WUC-15J
77 Jackson Boulevard
Chicago, Illinois 60604-3590

RE: Semi-Annual Report for Permit 2017-EO-62627

Dear Branch Chief

Please find enclosed the semi-annual report for lab analysis and effluent flows for the month of January from Hanna Steel Corporations Industrial Wastewater System. The effluent sample was pulled on January 11, 2021. As you can see the lab results are in mg/l and I have converted them to lbs/per day on my report/flow sheet.

If you should have any questions please contact me at (309) 478-3805.

Sincerely,
Hanna Steel Corporation

David Frantz
Env. / Safety Coordinator
DFrantz@hannasteel.com

Hanna Steel Corporation

Corporate Offices
4527 Southlake
Parkway
Hoover, Alabama
35244

Hanna Steel, Pekin
220 Hanna Drive
Pekin, Illinois 61554
TEL (309) 478-3800
FAX (309) 478-3810

Revision: A
Date: 1/27/04

Hanna Steel Corporation-Pekin
Industrial Wastewater Facility

Effluent Flow's For The Month Of: JANUARY 2021

Date	Beginning	End	Total	Days Ran
1	3139279	3139279	0	
2			0	
3			0	
4			0	
5			0	
6			0	
7			0	
8	3139279	3149269	9990	1
9			0	
10	3149269	3161178	11909	1
11			0	
12			0	
13			0	
14			0	
15	3161178	3168319	7141	1
16			0	
17			0	
18	3168319	3172193	3874	1
19			0	
20			0	
21			0	
22			0	
23			0	
24			0	
25			0	
26			0	
27			0	
28			0	
29	3172193	3182823	10630	1
30			0	
31			0	

Monthly Total

43544

5

Average Daily Flow
Page 1 of 1

8708.80

Limits

Pollutant	1-Day Max. (lbs/day)	Mo. Avg. (lbs per day)
Cyanide (Total)	0.2	0.08
Chromium (Total)	0.29	0.12
Zinc	0.92	0.04

Actual

	1-Day Max. (lbs/day)	Mo. Avg. (lbs per day)
Cyanide (Total)	0.0005	0.0018
Chromium (Total)	0.0005	0.0018
Zinc	0.0019	0.0073



ANALYTICAL RESULTS

Sample: EA01773-01
Name: EFFLUENT COMPOSITE
Matrix: Waste Water - Composite

Sampled: 01/11/21 01:00
Received: 01/12/21 11:15
PO #: 194302

Parameter	Result	Unit	Qualifier	Prepared	Dilution	MRL	Analyzed	Analyst	Method
Total Metals - PIA									
Chromium	< 0.0050	mg/L		01/13/21 10:52	1	0.0050	01/15/21 14:49	TJJ	EPA 200.7 REV 4.4
Zinc	< 0.020	mg/L		01/13/21 10:52	1	0.020	01/15/21 14:49	TJJ	EPA 200.7 REV 4.4

Sample: EA01773-02
Name: EFFLUENT GRAB
Matrix: Waste Water - Grab

Sampled: 01/11/21 12:58
Received: 01/12/21 11:15
PO #: 194302

Parameter	Result	Unit	Qualifier	Prepared	Dilution	MRL	Analyzed	Analyst	Method
General Chemistry - PIA									
Cyanide	< 0.0050	mg/L		01/18/21 08:29	1	0.0050	01/19/21 11:09	AMM	EPA 335.4 REV1



CHAIN OF CUSTODY RECORD

STATE: WHERE SAMPLE COLLECTED _____

(FOR LAB USE ONLY)

CHEMICAL PRESERVATION CODES:		1 - HCL	2 - H2SO4	3 - HNO3	4 - NaOH	5 - NA2S2O3	6 - UNPRESERVED	7 - OTHER
5	TURNAROUND TIME REQUESTED (PLEASE CHECK) (RUSH TAT IS SUBJECT TO PDC LABS APPROVAL AND SURCHARGE)		☒ NORMAL ☐ RUSH		DATE RESULTS NEEDED			
	RUSH RESULTS VIA (PLEASE CIRCLE) EMAIL ☐ PHONE ☐							
PHONE # IF DIFFERENT FROM ABOVE: _____ PHONE # IF DIFFERENT FROM ABOVE: _____								
I understand that by initialing this box I give the lab permission to proceed with analysis, even though it may not meet all sample conformance requirements as defined in the receiving facility's Sample Acceptance Policy and the data will be qualified. Qualified data may NOT be acceptable to report to all regulatory authorities.								
PROCEED WITH ANALYSIS AND QUALIFY RESULTS: (INITIALS) _____								

REINQUISHED BY: (SIGNATURE)		DATE		RECEIVED BY: (SIGNATURE)		DATE		COMMENTS: (FOR LAB USE ONLY)	
7		1-12-21		[Signature]		11/12/21		8	
REINQUISHED BY: (SIGNATURE)		TIME		RECEIVED BY: (SIGNATURE)		TIME		SAMPLE TEMPERATURE UPON RECEIPT	
[Signature]		10:15 AM		[Signature]		10:15		_____ °C	
REINQUISHED BY: (SIGNATURE)		DATE		RECEIVED BY: (SIGNATURE)		DATE		CHILL PROCESS STARTED PRIOR TO RECEIPT	
		TIME				TIME		SAMPLE(S) RECEIVED ON ICE	
								SAMPLE ACCEPTANCE NONCONFORMANT	
REINQUISHED BY: (SIGNATURE)		DATE		RECEIVED BY: (SIGNATURE)		DATE		REPORT IS NEEDED	
		TIME				TIME		DATE AND TIME TAKEN FROM SAMPLE BOTTLE	



Hanna Steel Corporation

Corporate Office

4527 Southlake Parkway
Hoover, Alabama 35244

Hanna Steel Corporation, Pekin
220 Hanna Drive
Pekin, Il. 61554
Tel (309) 478-3800
Fax (309) 478-3810

January 15, 2024

Illinois Environmental Protection Agency
Water Pollution Control
Compliance Assurance Sec #19
1021 North Grand Avenue East
P.O. Box 19276
Springfield, Il. 62794-9276

Re: Storm Water Facility Inspection Report
Permit # ILR 005758

Dear Sir Or Madam

Please find enclosed a copy of the annual facility inspection report for the year 2023. Based on weekly inspections during the course of the reporting period, Hanna Steel did not experience any spills that resulted in pollutants being discharged into the storm water runoff.

If you should have any questions or I can be of further assistance please contact me at (309) 478-3805.

Sincerely
Hanna Steel Corporation

A handwritten signature in black ink, appearing to read "D. Frantz", with a long horizontal flourish extending to the right.

David Frantz
Env. / Safety Coordinator
DFrantz@Hannasteel.com



Illinois Environmental Protection Agency

Bureau of Water • 1021 North Grand Avenue East • P.O. Box 19276 • Springfield • Illinois • 62794-9276

Division of Water Pollution Control ANNUAL FACILITY INSPECTION REPORT

for NPDES Individual Permit for Storm Water Discharges Associated with Industrial Site Activities

This fillable form may be completed online, a copy saved locally, printed and signed before it is submitted to the Compliance Assurance Section at the above address. Complete each section of this report. Place a NA in sections that do not apply to your operation.

Report Period: From: January 2023 To: January 2024
(Month) (Year) (Month) (Year)

NPDES Permit No. IL00 5758

OWNER/OPERATOR INFORMATION: (As it appears on the current permit)

Name: Hanna Steel Corporation

Mailing Address: 220 Hanna Drive

City: Pekin State: IL Zip: 61554 Telephone: (309) 478-3800

Contact Person: David Frantz (Person responsible for Annual Report)

FACILITY/SITE INFORMATION: (As it appears on the current permit)

Facility Name: Hanna Steel Corporation

Facility Location: 220 Hanna Drive

City: Pekin IL Zip: 61554 County: Tazewell

Attach information concerning quarterly visual observations of discharges as found in Item H of your Permit. Include a summary of all periodic inspections required by the NPDES Permit.

Any person who knowingly makes a false, fictitious, or fraudulent material statement, orally or in writing, to the Illinois EPA commits a Class 4 felony. A second or subsequent offense after conviction is a Class 3 felony. (415 ILCS 5/44(h))

David Frantz
Owner Signature:

David Frantz

Printed Name:

11-15-2024

Date:

Environmental/Safety Coord.

Title:

EMAIL COMPLETED FORM TO: EPA.NPDES.Inspection@illinois.gov

or Mail to: ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

WATER POLLUTION CONTROL

COMPLIANCE ASSURANCE SECTION #19

1021 NORTH GRAND AVENUE EAST

POST OFFICE BOX 19276

SPRINGFIELD, ILLINOIS 62794-9276

HANNA STEEL CORP STORM WATER / RCRA WEEKLY INSPECTION

DATE: January 15, 2024

INSPECTED BY: David Frantz

5.1.1 Paint Storage

	Pass	Fail
1. Are all materials properly stored & labeled?	☒	☐
2. Do any containers show signs of deterioration or leaks? (if so give the paint line supervisor a copy of the checklist)	☒	☐
3. Does the storage or loading area show any signs of spills?	☒	☐
4. Is the storage and loading area clean?	☒	☐

5.3.1 Waste storage area

1. Does the storage area show any signs of spills?	☒	☐
2. Do any containers show signs of deterioration or leaks? (if so give the paint line supervisor a copy of the checklist)	☒	☐
3. Are all materials properly stored & labeled?	☒	☐
4. Is the storage area clean, free of debris?	☒	☐
5. Are containers covered and stored properly?	☒	☐

5.2.1 Chemical Storage & Loading / Unloading Areas

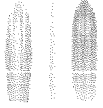
	Pass	Fail
1. Are all materials properly stored & labeled?	☒	☐
2. Do any containers show signs of deterioration or leaks? (if so give the paint line supervisor a copy of the checklist)	☒	☐
3. Is the storage area clean, free of debris?	☒	☐

5.4.1 Hydrochloric Acid Loading & Unloading Area

1. Are there signs of leaks or rust on valves or pipes?	☒	☐
2. Are there any problems that need repair? (If so, give the paint line supervisor a copy of the checklist)	☒	☐
3. Does the storage or loading area show any signs of spills?	☒	☐
4. Is spill response equipment adequate and accessible?	☒	☐

Notes: No Events for 2023

1/30/2023



To: EPA.NPDES.Inspection@illinois.gov
Cc: Randy Rendfeld/Hanna,
Bcc:
Subject: Annual Facility Inspection Report Hanna Steel Corp. IL 005758

Dear Sir or Madam,

Please accept Hanna Steel annual end of year report for 2022.



2022 Annual Storm Water NPDES Report.pdf

Thank you,

David Frantz
Env./Safety Coordinator
Hanna Steel Corp.
DFrantz@hannasteel.com
309-478-3805
Fax 309-478-3810
Pekin, IL, Division



Hanna Steel Corporation

Corporate Office

4527 Southlake Parkway
Hoover, Alabama 35244

Hanna Steel Corporation, Pekin

220 Hanna Drive
Pekin, IL 61554
Tel (309) 478-3800
Fax (309) 478-3810

January 30, 2023

Illinois Environmental Protection Agency
Water Pollution Control
Compliance Assurance Sec #19
1021 North Grand Avenue
P.O. Box 19276
Springfield, IL 62794-9276

Re: Storm Water Facility Inspection Report
Permit # ILR 005758

Dear Sir Or Madam

Please find enclosed a copy of the annual facility inspection report for the year 2022. Based on weekly inspections during the course of the reporting period, Hanna Steel did not experience any spills that resulted in pollutants being discharged into the storm water runoff.

If you should have any questions or I can be of further assistance please contact me at (309) 478-3805.

Sincerely
Hanna Steel Corporation

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David Frantz
Env. / Safety Coordinator
Dfrantz@Hannasteel.com



Illinois Environmental Protection Agency

Bureau of Water • 1021 North Grand Avenue East • P.O. Box 19276 • Springfield • Illinois • 62794-9276

Division of Water Pollution Control ANNUAL FACILITY INSPECTION REPORT

for NPDES Individual Permit for Storm Water Discharges Associated with Industrial Site Activities

This fillable form may be completed online, a copy saved locally, printed and signed before it is submitted to the Compliance Assurance Section at the above address. Complete each section of this report. Place a NA in sections that do not apply to your operation.

Report Period: From: January 2022 To: January 2023
(Month) (Year) (Month) (Year)

NPDES Permit No. IL00 5758

OWNER/OPERATOR INFORMATION: (As it appears on the current permit)

Name: Hanna Steel Corporation

Mailing Address: 220 Hanna Drive

City: Pekin State: IL Zip: 61554 Telephone: 309-478-3805

Contact Person: David Frantz (Person responsible for Annual Report)

FACILITY/SITE INFORMATION: (As it appears on the current permit)

Facility Name: Hanna Steel Corporation

Facility Location: 220 Hanna Drive

City: Pekin IL Zip: 61554 County: Tazewell

Attach information concerning quarterly visual observations of discharges as found in Item H of your Permit. Include a summary of all periodic inspections required by the NPDES Permit.

Any person who knowingly makes a false, fictitious, or fraudulent material statement, orally or in writing, to the Illinois EPA commits a Class 4 felony. A second or subsequent offense after conviction is a Class 3 felony. (415 ILCS 5/44(h))

David Frantz
Owner Signature:

David Frantz

Printed Name:

1/30/2023
Date:

Safety/Environmental Coord.

Title:

EMAIL COMPLETED FORM TO: EPA.NPDES.Inspection@illinois.gov

or Mail to: ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

WATER POLLUTION CONTROL
COMPLIANCE ASSURANCE SECTION #19
1021 NORTH GRAND AVENUE EAST
POST OFFICE BOX 19276
SPRINGFIELD, ILLINOIS 62794-9276

HANNA STEEL CORP

STORM WATER / RCRA

WEEKLY INSPECTION

DATE: January 5, 2023

INSPECTED BY: David Frantz

5.1.1 Paint Storage

1. Are all materials properly stored & labeled?
2. Do any containers show signs of deterioration or leaks? (if so give the paint line supervisor a copy of the checklist)
3. Does the storage or loading area show any signs of spills?
4. Is the storage and loading area clean?

Pass	Fail
☒	☐
☒	☐
☒	☐
☒	☐

5.2.1 Chemical Storage & Loading / Unloading Areas

1. Are all materials properly stored & labeled?
2. Do any containers show signs of deterioration or leaks? (if so give the paint line supervisor a copy of the checklist)
3. Is the storage area clean, free of debris?

Pass	Fail
☒	☐
☒	☐
☒	☐

5.3.1 Waste storage area

1. Does the storage area show any signs of spills?
2. Do any containers show signs of deterioration or leaks? (if so give the paint line supervisor a copy of the checklist)

☒	☐
☒	☐

5.4.1 Hydrochloric Acid Loading & Unloading Area

1. Are there signs of leaks or rust on valves or pipes?
2. Are there any problems that need repair? (If so, give the paint line supervisor a copy of the checklist)
3. Does the storage or loading area show any signs of spills?
4. Is spill response equipment adequate and accessible?

☒	☐
☒	☐
☒	☐
☒	☐

Notes: No Events for 2022



GFL Environmental
26999 Central Park Blvd
Suite 200
Southfield MI 48076

P: (309) 688-0760

PO# 276131

CUSTOMER #: P410812
INVOICE #: P40000089004
INVOICE DATE: 10/31/2022
TOTAL AMOUNT DUE: \$4,217.04
REF/PO #:

Page 1 of 1



DUE DATE:
Due Upon Receipt

DATE	DESCRIPTION	REFERENCE	RATE	QTY	AMOUNT
	(0001) HANNA STEEL CORP 220 HANNA DR , PEKIN IL Serv #001 RO WASTE PERM 22YD				
10/25/22	RO EXCHANGE W.O# 16090		\$330.00	1.00	\$330.00
10/25/22	NON SPECIAL WASTE - TONS	P6-26968	\$53.00/TN	17.63 TN	\$934.39
10/31/22	EQUIPMENT USE FEE Oct 16/22 - Oct 31/22		\$125.00	0.52	\$64.51
10/25/22	FUEL SURCHARGE				\$380.58
10/25/22	ENVIRONMENTAL SURCHARGE				\$164.37
	SITE TOTAL				\$1,873.85
	(0000)				
10/31/22	ADMIN FEE	SC91264			\$7.50
	SITE TOTAL				\$7.50
	PDO50 ENV07 HP 260146 REF 399033 11-21-22				

Notes:

Due to increased costs, your next invoice may reflect a price increase. Please remit payment immediately to avoid collections actions on your account.

**To pay your
 invoice online,
 please visit
 us at:
[www.gflenv.com/
 pay-my-bill/](http://www.gflenv.com/pay-my-bill/)**

CURRENT	31 - 60 DAYS	61 - 90 DAYS	OVER 90 DAYS	ACCOUNT TOTAL	TOTAL INVOICE
\$4,082.53	\$70.00	\$0.00	\$64.51	\$4,217.04	\$1,881.35

Please return bottom portion with your payment. Include customer and invoice numbers on check or money order.



GFL Environmental
26999 Central Park Blvd
Suite 200
Southfield MI 48076

P: (309) 688-0760

CUSTOMER #: P410812
INVOICE #: P40000089004
INVOICE DATE: 10/31/2022
TOTAL AMOUNT DUE: \$4,217.04

DUE DATE: Due Upon Receipt

AMOUNT OF REMITTANCE:

\$

PLEASE REMIT PAYMENT TO:

12654147-34-1 1 1



HANNA STEEL CORP
 220 HANNA DR
 PEKIN IL 61554-8793



GFL ENVIRONMENTAL
 PO BOX 555193
 DETROIT MI 48255-5193

00555193P4000008900400010812000000001881358



PDC Services, Inc.

P.O. Box 9071, Peoria, IL 61612-9071 www.pdcarea.com 309-688-0760

WO#: ~~16090~~ 16090 Date: 10-25-22
Cust Name: Hanna Steel
Address: _____
City: Peoria State: IL
Site Start Time: _____
Site End Time: _____ PO #: _____

Residential/Commercial Containers (Circle)

Container Size: _____
Container Delivery Extra Pick-Up
Empty and Leave Other _____
Retrieve
Extra Yardage (Quantity) _____

Roll-Off Service Containers (Circle)

Container Size: 225
Box Delivery Double Box Delivery
Dump/Return Open Top
Dump/Exchange Compactor Receiver
Dump/Final Self Contained Compactor
Demurrage Other/Notes DUT 225230
Relocate Box _____

Payment Received:

(Circle Payment Type)

Cash

Check # _____

Driver: 

Route ID: _____

Customer/Designee Signature (below) acknowledges service was provided by
PDC Services, Inc. and agrees to all terms and conditions as
listed on the reverse side of this Service Receipt

Customer Name (print): _____

Customer Signature: _____

Date: _____



GFL Environmental
26777 Central Park Blvd
Suite 255
Southfield MI 48076

P: (309) 688-0760

CUSTOMER #: P410812
INVOICE #: P40000174264
INVOICE DATE: 09/30/2023
TOTAL AMOUNT DUE: \$2,025.34
REF/PO #:

Page 1 of 1

DUE DATE:
Due Upon Receipt

DATE	DESCRIPTION	REFERENCE	RATE	QTY	AMOUNT
	(0001) HANNA STEEL CORP 220 HANNA DR, PEKIN IL Serv #001 RO WASTE PERM 22YD				
9/29/23	RO EXCHANGE W.O# 38086	P6-59204	\$347.00	1.00	\$347.00
9/29/23	NON SPECIAL WASTE - TONS		\$65.00/TN	13.06 TN	\$848.90
9/30/23	EQUIPMENT USE FEE Aug 22/23 - Sep 26/23		\$125.00	1.19	\$148.65
9/29/23	FUEL SURCHARGE				\$322.30
9/29/23	ENVIRONMENTAL SURCHARGE				\$298.98
	SITE TOTAL PD050/ENV07 HP #260146 PO# 409359 10/3/23				\$1,965.83

Notes:

Due to increased costs, your next invoice may reflect a price increase. Please remit payment immediately to avoid collections actions on your account.

To pay your
invoice online,
please visit
us at:
[www.gflenv.com/
pay-my-bill/](http://www.gflenv.com/pay-my-bill/)

CURRENT \$1,966.71	31 - 60 DAYS \$0.00	61 - 90 DAYS \$0.00	OVER 90 DAYS \$58.63	ACCOUNT TOTAL \$2,025.34	TOTAL INVOICE \$1,965.83
-----------------------	------------------------	------------------------	-------------------------	-----------------------------	-----------------------------

Please return bottom portion with your payment. Include customer and invoice numbers on check or money order.



GFL Environmental
26777 Central Park Blvd
Suite 255
Southfield MI 48076

P: (309) 688-0760

CUSTOMER #: P410812
INVOICE #: P40000174264
INVOICE DATE: 09/30/2023
TOTAL AMOUNT DUE: \$2,025.34

DUE DATE: Due Upon Receipt

AMOUNT OF REMITTANCE:

\$

HANNA STEEL CORP
220 HANNA DR
PEKIN, IL 61554

PLEASE REMIT PAYMENT TO:

GFL Environmental
PO BOX 555193
DETROIT MI 48255-5193

00555193P4000017426400010812000000001965835



GFL Environmental
26777 Central Park Blvd
Suite 255
Southfield MI 48076

P: (309) 688-0760

CUSTOMER #: P410812
INVOICE #: P40000180282
INVOICE DATE: 10/20/2023
TOTAL AMOUNT DUE: \$2,249.65
REF/PO #:

Page 1 of 1

DUE DATE:
Due Upon Receipt

DATE	DESCRIPTION	REFERENCE	RATE	QTY	AMOUNT
	(0001) HANNA STEEL CORP 220 HANNA DR, PEKIN IL Serv #001 RO WASTE PERM 22YD				
10/11/23	RO FINAL PULL W.O# 38895	PG-60371	\$347.00	1.00	\$347.00
10/11/23	NON SPECIAL WASTE - TONS		\$65.00/TN	16.77 TN	\$1,090.05
10/20/23	EQUIPMENT USE FEE Sep 27/23 - Oct 11/23		\$125.00	0.49	\$61.03
10/11/23	FUEL SURCHARGE				\$392.31
10/11/23	ENVIRONMENTAL SURCHARGE				\$359.26
	SITE TOTAL				\$2,249.65
PDOSO/ENV07 # 260146 Req # 409946 10/23/23 PO # 283691					

Notes:

Due to increased costs, your next invoice may reflect a price increase.

**To pay your
invoice online,
please visit
us at:
[www.gflenv.com/
pay-my-bill/](http://www.gflenv.com/pay-my-bill/)**

CURRENT \$2,249.65	31 - 60 DAYS \$0.00	61 - 90 DAYS \$0.00	OVER 90 DAYS \$0.00	ACCOUNT TOTAL \$2,249.65	TOTAL INVOICE \$2,249.65
------------------------------	-------------------------------	-------------------------------	-------------------------------	------------------------------------	------------------------------------

Please return bottom portion with your payment. Include customer and invoice numbers on check or money order.



GFL Environmental
26777 Central Park Blvd
Suite 255
Southfield MI 48076

P: (309) 688-0760

CUSTOMER #: P410812
INVOICE #: P40000180282
INVOICE DATE: 10/20/2023
TOTAL AMOUNT DUE: \$2,249.65

DUE DATE: Due Upon Receipt

AMOUNT OF REMITTANCE:

\$

PLEASE REMIT PAYMENT TO:

HANNA STEEL CORP
220 HANNA DR
PEKIN, IL 61554

GFL Environmental
PO BOX 555193
DETROIT MI 48255-5193

00555193P4000018028200010812000000002249654



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

1021 NORTH GRAND AVENUE EAST, P.O. BOX 19276, SPRINGFIELD, ILLINOIS 62794-9276 • (217) 782-3397

JB PRITZKER, GOVERNOR

JOHN J. KIM, DIRECTOR

August 4, 2023

SERGIO BECERRA
220 HANNA DR
PEKIN, IL. 61554

RE: Notice of Renewal - General Storm Water Permit for Industrial Site Activities
Facility: Hanna Steel Corporation - Pekin, IL - County: Tazewell
NPDES Permit No: ILR005758 Bureau ID: W1794730017

Dear NPDES Permittee:

We have reviewed your renewal application and determined that storm water discharges associated with industrial activity (excluding construction sites) are appropriately covered by the General NPDES Permit Issued by the Agency.

The Permit issued covers application requirements, a Storm Water Pollution Prevention Plan, and reporting requirements. Failure to meet any portion of the Permit could result in civil and/or criminal penalties. The Agency is ready and willing to assist you in interpreting any of the conditions of the Permit as they relate specifically to your discharge. An electronic copy of your facility's SWPPP must be submitted to the Agency in accordance with Part E.2 of the ILR00 Permit.

The Permit and attachments are available through the following website address:
<https://epa.illinois.gov/topics/forms/water-permits/storm-water/industrial.html>

Your discharge is covered by this permit effective as of the date of this letter. You have the right to appeal the Agency's decision to cover the discharge by the General Permit to the Illinois Pollution Control Board within a 35-day period following the date of this letter.

Your original approval date is 10/14/1998. Annual reports for your facility are required to be submitted to the Agency pursuant to Part K.2 of this permit. This letter shows your facility permit number below your facility name. Please reference this number in all future correspondence. Should you have any questions concerning the Permit, please contact the Permit Section at 217/782-0610.

Sincerely,

A handwritten signature in blue ink, appearing to read "Darin E. LeCrone".

Darin E. LeCrone, P.E.
Manager, Permit Section
Division of Water Pollution Control

HANNA STEEL CORPORATION

PEKIN, IL FACILITY

STORMWATER POLLUTION PREVENTION PLAN
(SWPPP)

NPDES PERMIT ILR005758
STORMWATER POLLUTION PREVENTION PLAN

- I. PLAN CONTENT. The purpose of this plan is to prepare and implement practices which shall:
 - A. Provide control sufficient to prevent or control pollution of storm water by soil particulates to the degree required to maintain compliance with the suspended solids limitations of the NPDES permit; and the water quality standard for turbidity applicable to the water body(s) receiving discharge(s) under this permit;
 - B. Prevent the spillage or loss of fluids, *oil*, grease, gasoline, etc. from vehicle and equipment maintenance activities and thereby prevent the contamination of storm water from these substances;
 - C. Prevent or minimize storm water contact with material stored on site;
 - D. Designate by position or name the person or persons responsible for the day to day implementation of the SWPP;
 - E. Provide for bi-weekly inspections, on days during which the facility is manned, of any structures that function to prevent storm water pollution or to remove pollutants from storm water and of the *facility in general* to ensure that the SWPP is continually implemented and effective;
 - F. Provide for the use and disposal of any material used to absorb spilled fluids that could contaminate storm water;
 - G. Develop a solvent management plan. The solvent management plan shall include as a minimum lists of the total organic compounds used; the method of disposal used instead of dumping, such as reclamation, contract hauling; and the procedures for assuring that toxic organics do not spill or leak into the storm water;
 - H. Provide for the proper disposal of all used oils, hydraulic fluids, solvent degreasing material, etc. in accordance with good management practices and any applicable state or federal regulation;
 - I. Include a diagram of the facility showing the locations where storm water exits the facility, the locations of any structures or other mechanisms intended to prevent pollution of storm water or to remove pollutants from storm water, the locations of any collection and handling systems; and
 - J. Bear the signature of an individual meeting the requirements for signing the Notice of Intent.

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 - Waste Storage Area
 - Chemical Storage Area & Unloading/Loading Areas
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- 2.2 Good Housekeeping
- 2.3 Preventative Maintenance
- 2.4 Spill Prevention and Response
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- 5.6 Spills within Bermed Area
- 5.7 Uncontaminated Spills
- 5.8 Emergency Response Checklist (ER)- Written Report

SECTION 6 - SPECIAL INSTRUCTIONS

- 6.1 Certification of BMP
- 6.2 SECTION 1 - NARRATIVE DESCRIPTION OF THE FACILITY

1.1 Nature of Industrial Activities

Hanna Steel Corporation is located at 220 Hanna Drive, Pekin, Illinois, 61554. Hanna was founded in 1954 and has two additional facilities in Alabama. The newest facility in Pekin, IL currently employs about 60 people and runs production on four, 10 hour first shifts being Monday through Thursday, 6 AM - 4:30 PM and four 10 hour third shifts 4:30 P.M. – 3:00 A.M. Shipping product services operate at two, 8 hour shifts being Monday through Friday, 6 AM - 10 PM.

The facility will consist of a coil pickling and coating line and two structural tube mills. The coil coating line will be capable of handling between 250,000- 300,000 ton per year of hot and cold- rolled carbon steel. Also, the line will process steel ranging up to 0.134 inch thick and 60 inches wide in rolls weighing up to 60,000 pounds. Coils of sheet steel are passed through a series of processes in order to produce a finished product of coated steel that is used primarily in the construction of prefabricated metal buildings and the manufacture of steel drums. (The aforementioned Process ended April of 2021 and will not resume.) The tube mill will produce round, square, and rectangular steel tubing used primarily for the mechanical, structural, and automotive industries. These products will be stored in the warehouse prior to customer pickup and delivery.

(*The coil coating (paint line) will consist of a hydrochloric acid pickling section, induction curing process, a double uncoiler, precision leveler, and a paint coating room. All fumes from the pickling and rinse sections of the line are vented to an extensive exhaust system attached to each section. These fumes are transported to a "wet" fume scrubber then rinsed and removed from the gas stream. A wastewater treatment system will handle the "rinse" water from the scrubber, taking care of chemical treatment of solids precipitation, pH control, and sludge disposal with a filter press. The final effluent will be discharged to the City of Pekin Wastewater treatment plant, and the filter cake shall be contract hauled to a non-hazardous Class D landfill.) (The *aforementioned Processes ended April of 2021 and will not resume.)

Another process is the spraying of the outer edges of the finished painted steel coils. This is done in front of a spray paint booth with water-based air-dry paints. A filtration and exhaust unit will capture particulate matter and exhaust fumes to the stack located outside and above the roof.

1.2 Materials, Equipment, and Vehicle Management Practices

The chemical storage area is in an exterior building. (See site map)

1.3 Methods of onsite storage and disposal of significant materials

Paint Storage Area

Good Housekeeping Operation & Maintenance: Clean up any spills immediately during loading of materials. Regularly pick up and dispose of garbage and waste material, keeping the area clean and free of unwanted debris.

Material Storage Practices: Provide adequate aisle space to facilitate material transfer and easy access for inspections. Store containers, drums, and bags away from direct traffic routes to prevent accidental spills. Stack containers according to manufacturers' instructions. Assign a limited number of people who are trained in handling hazardous materials.

Material Inventory Process: Keep an up-to-date inventory of all materials (hazardous and non-hazardous) present. Identify all chemical substances present in the workplace, and obtain Material Safety Data Sheets (MSDS), and/or (SDS) Safety Data Sheets to comply with the 2016 completion date set by OSHA GHS mandate for each. Label all containers to show the name and type of substance, stock number, expiration date, health hazards, suggestions for handling, and first aid information. Clearly mark on the inventory, hazardous materials that require special handling, storage, use, and disposal considerations. Limit the number of people that can handle hazardous material to those with proper training.

Preventative Maintenance

Carry out normal building and loading area maintenance.

Inspections

Daily inspection to see that all areas are clean and that all materials are properly stored and labeled.

Spill Prevention Response

The paint storage area should have adequate spill response materials at all times. The Spill Response Kit should be inventoried with all other materials. If there is a spill of any nature in the waste storage area that is not in a containment area, take immediate action to prevent it from contaminating the surrounding soils and storm water runoff. If it is a material that is potentially toxic notify the appropriate person according to the emergency response checklist (section 5.7 and 5.8).

Waste Storage Area

Good Housekeeping Operation & Maintenance: Clean up any spills daily. Keep appropriate cleaning material and spill response materials on hand.

Preventative Maintenance

Carry out proper waste handling, storage and treatment procedures. Provide for the safe and optimum storage of all containers in order to prevent storm water contamination.

Inspections

Bi-Weekly inspection to see that all containers and materials are properly stored and labeled and that there are no containers that show signs of deterioration or leakage.

Spill Prevention and Response

If there is a spill of any nature in the waste storage area that is not in a containment area, take immediate action to prevent it from contaminating the surrounding soils and storm water runoff. If it is a material that is potentially toxic notify the appropriate person according to the emergency response checklist (section 5.7 and 5.8).

Management of Runoff

If there is water in the containment area refer to checklist. Sample storm water as required by the storm water permit.

Chemical Storage Area & Unloading/Loading Areas

Good Housekeeping

Maintenance: Clean up any spills immediately during loading of materials. Regularly pick up and dispose of garbage and waste material, keeping the area clean and free of unwanted debris. Keep appropriate cleaning material and spill response materials on hand.

Material Storage Practices: Provide adequate aisle space to facilitate material transfer and easy access for inspections. Store containers, drums, and bags away from direct traffic routes to prevent accidental spills. Stack containers according to manufacturers' instructions. Assign a limited number of people who are trained in handling hazardous materials.

Material Inventory Process: Keep an up-to-date inventory of all materials (hazardous and non-hazardous) present. Identify all chemical substances present in the workplace, and obtain Material Safety Data Sheets (MSDS) and/or (SDS) Safety Data Sheets per GHS compliance for each. Label all containers to show the name and type of substance, stock number, expiration date, health hazards, suggestions for handling, and first aid information. Clearly mark on the inventory, hazardous materials that require special handling, storage, use, and disposal considerations. Limit the number of people that can handle hazardous material to those with proper training.

Preventative Maintenance

Carry out proper waste handling, storage and treatment procedures. Provide for the safe and optimum storage of all containers in order to prevent storm water contamination.

Inspections

Bi-Weekly inspection to see that all containers and materials are properly stored and labeled and that there are no containers that show signs of deterioration or leakage. Also inspection incoming chemical containers that are unloaded in the plant.

Spill Prevention and Response

If there is a spill of any nature in the waste storage area that is not in a containment area, take immediate action to prevent it from contaminating the surrounding soils and storm water runoff. If it is a material that is potentially toxic notify the appropriate person according to the emergency response checklist (section 5.7 and 5.8).

Management of Runoff

If there is water in the containment area refer to checklist. Sample storm water as required by the storm water permit.

1.4 Size of the Facility

The site is approximately 38.5 acres in size and is located Quarter W ½, Section 10, Township 24N, Range 5W, P.M 3rd and at latitude N 40-32' and longitude W 89-38' as indicated in the enclosed Topographical Map.

SECTION 2 - STORM WATER MANAGEMENT CONTROLS

2.1 SWPPP Personnel

The SWPPP team consists of the following members:

<u>Member - Title</u>	<u>Responsibility</u>
Randy Rendfeld, General Manager	Signatory authority; coordinate all stages of site development. Note any process changes; oversee employee training; and ensure compliance with all aspects of this plan.
David Frantz, Env./Safety Coordinator	Coordinate all stages of plan development and implementation; coordinate employee training programs; keep all records and ensure reports are submitted. Spill Response Team member; oversees good housekeeping. Conduct site inspections.
Derek Guidotti, Maint. Superintendent	Maintain preventative maintenance program and checklist and documentation for equipment maintenance.

2.2 Good Housekeeping

Good housekeeping practices are designed to maintain a clean and orderly work environment. The most effective first step towards preventing pollution in storm water from industrial sites simply involves using good common sense to improve the facility's basic housekeeping methods. Poor housekeeping can result in more waste being generated than necessary and an increased potential for storm water contamination. A clean and orderly work area reduces the possibility of accidental spills caused by the

Mishandling of chemical storage areas and will reduce the possibility of pollutants mixing with storm water.

Good housekeeping includes improved operations and maintenance of industrial machinery and processes, material inventory controls, routine and regular clean-up schedules, maintaining well organized work areas, and educational programs for all employees.

2.3 Preventative Maintenance

Preventative maintenance involves the regular inspection and testing of the plant, equipment, and operational systems. These inspections should uncover conditions such as cracks or slow leaks which could cause breakdowns or failures that result in discharges of chemicals to storm sewers and surface waters. The program should prevent breakdowns and failure by adjustment, repair or replacement of equipment. An effective preventative maintenance program should include the following elements:

- Identification of equipment, systems, and facility areas that should be inspected.

- Schedule for periodic inspection or tests of these equipment and systems.

- Appropriate and timely adjustment, repair or replacement of equipment and systems.

- Maintenance of complete records on inspection, equipment, and systems.

2.4 Spill Prevention and Response

Spills and leaks together are one of the largest industrial sources of storm water pollutants, and in most cases are avoidable. Development of spill prevention and response procedures is important.

The areas of likely spill are listed in Section 3.1.

2.5 Visual Inspections

Routine visual inspections are not meant to be a comprehensive evaluation of the entire storm water pollution prevention program. They are meant to be a routine look-over of the facility to identify conditions which may give rise to contamination of storm water runoff with pollutants from the facility.

2.6 Sediment and Erosion Control

There may be certain areas on the site which, due to construction activities, steep slopes, sandy soils, or other reasons, are prone to soil erosion.

2.7 Management of Runoff

The use of appropriateness of traditional storm water management practices (practices other than those which control the source of pollutants).

2.8 Solvent Management Plan

- a. Lacquer Thinner Aromatic 100 and MEK is to be used only on the paint line unless authorized by a supervisor.
- b. A supervisor may authorize the use of Aromatic 100 in other departments, but the supervisor must directly oversee the dispensing and use of the product.
- c. Hazardous material spillage must be reacted to immediately by the following Emergency Checklist (section 5.7 and 5.8). If the Emergency Coordinator (or his designee) determines that the spillage is within our own capabilities, he will authorize and supervise the clean-up.
 - 1) In the event of a hazardous spill, the source of the hazardous material should be immediately shut off or plugged.
 - 2) The emergency spill kit should be opened and the appropriate boom or absorbent used to contain the hazardous material in the smallest area possible.
 - 3) Once the spill has been contained the emergency coordinator (or his designee) will determine if the spilled material should be treated or neutralized before it is absorbed with absorbents from the emergency spill kit.
 - 4) Once the hazardous material has been absorbed, the used materials and booms should be placed in a hazardous material salvage drum.
 - 5) If the spill occurred on the ground, the dirt which has been contaminated should be placed in a separate salvage drum. Ensure that all contaminated soil is dug up to prevent seepage into the water table.
 - 6) In the event there is groundwater contamination the Illinois Environmental Protection Agency (IEPA) should be notified immediately.

SECTION 3 - ASSESSMENT

3.1 Potential Storm Water Contamination (Material Inventory)

There are two areas where material handling and storage activities take place.

The paint storage building (see site map) contains (55) gallon drums of paint. The paint storage building holds (15) drums.

There is a waste storage area (see site map) that is used for the collection and storage of waste materials prior to shipment for off-site disposal. This area will consist of a concrete pad and is covered and diked in order to further prevent the potential for storm water contamination.

Three loading and unloading areas at the facility.

1. Loading area at the paint storage building. The loading is done with a fork lift, from the truck to the building.
2. Loading area at the stores building where all other materials used in the plant are loaded. These materials typically come packaged in boxes, cartons, drums, and other commonly used packaging techniques.

3.2 Site Map

- See attached site map

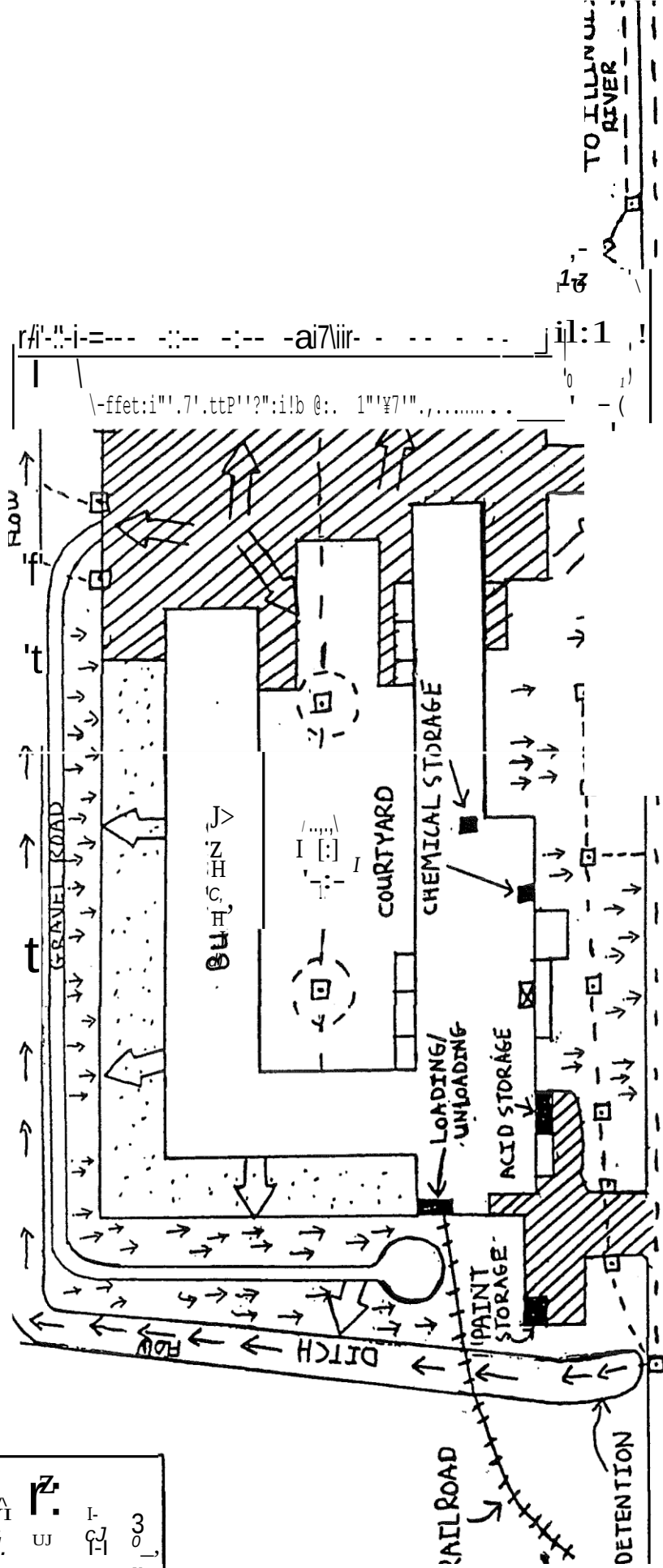
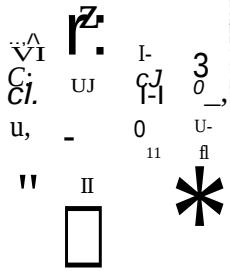
3.3 Topographic Map

- See attached Topographic Map

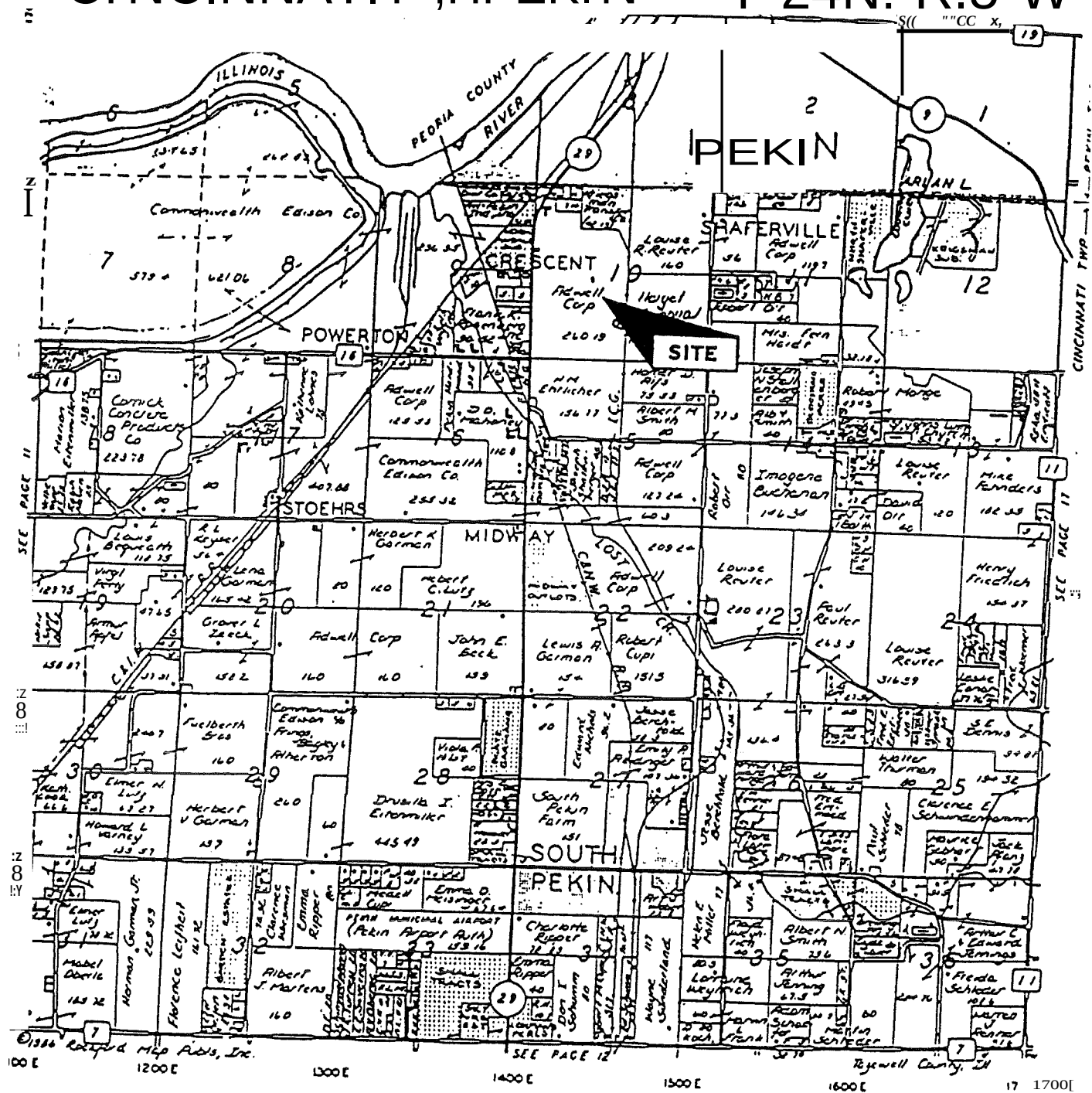
3.4 Past Spills and Leaks

The facility began production in the Spring of 1999, and there has been no significant event of potential storm water contamination.

- [] = STORM SEWER DRAIN
- [X] = WASTE WATER DISCHARGE
- = STORM WATER LINES



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3.5 Non-Storm Water Discharges

(*A wastewater treatment system will handle the "rinse" water from the fume scrubber taking care of chemical treatment of solids precipitation, pH control, and sludge disposal with a filter press. The final effluent will be discharged to the City of Pekin Wastewater treatment plant. The Illinois EPA Permit Number for this metal finishing pretreatment system is 2017-EO-62627.) (The *aforementioned Process ended April of 2021 and will not resume.) The 2017 permit will expire in 2022.

3.6 Storm Water Monitoring Data

Storm water sampling is currently not required under the General NPDES permit for this location.

Visual inspection and certification will be made of each storm water discharge and other areas that are included in the checklists.

3.7 Assessment and Summary

This SWPPP or BMP (Best Management Plan) will address the areas mentioned below.

Storm water from the paint storage building and the waste storage area.

SECTION 4 - MEETINGS, TRAINING, AND INSPECTION CHECKLISTS

4.1 Meetings

The BMP Committee will meet periodically. The purpose will be to discuss the implementation plan and set or revise time tables for accomplishment of planned BMP strategies. The group will report on the activities as assigned on the implementation page.

4.2 SWPPP Inspection Checklist Guide

BMP checklist should be done on the frequency listed below. There is to be a checklist book folder established for each week with all checklist included for use. After the checklists for the week are completed they are to be kept for a year.

BMP PLAN CHECKLIST GUIDE

CHECKLIST	FREQUENCY
General Facility Checklist	Daily
Paint Storage Area (PSAC)	Bi-Weekly
Chemical Loading/Unloading Area (CLUC)	Bi-Weekly
Petroleum Storage Area Checklist (PSC) - *if on-site	Daily
Waste Storage Checklist (WSC)	Bi-Weekly

4.3 Training

Each employee is to be trained in BMP by the following method. There will be a file on each one with the following checklist that must be completed within one month after employment. The completion of the training is the responsibility of the supervisor. See Checklist.

SECTION 5 - EMERGENCY RESPONSE

5.1 Potential Spill Sources

There are three possible spill scenarios which may occur:

- 1) Spill in the lacquer thinner loading area.
- 2) Spill in the paint storage building area.
- 3) Spill in the waste storage area.

5.2 Spill Control Equipment

Most spills and leaks will be less than 55 gallons and stay near the area of the spill. Dry clean up methods such as applying absorbent materials on spills, will be used where possible. Stained absorbent will be swept up using shovels, placed in drums, identified, dated, and handled as petroleum contaminated waste, or non-hazardous waste. Typical applications for adsorbent materials are shown in the following Figure.(Note that non-biodegradable absorbents for cleaning up hazardous waste spills must be used if the spent absorbent is intended for disposal in an approved landfill.

Hanna S I Corporation
Week of _/_/_

5.1.1 PAINT STORAGE

- 1 Are all materials properly stored and labeled?
- 2 Do any containers show signs of deterioration or leaks? (if so give the paint line supervisor a copy of the checklist)
- 3 Does the storage or loading area show any signs of spills?
- 4 Is the storage and loading area clean?

<u>Pass/Fail</u>	Pass/Fail
<u> </u>	<u> </u>
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Day	<u> </u>

5.2.1 CHEMICAL STORAGE & UNLOADING/LOADING AREAS

- 1 Are all materials properly stored and labeled?
- 2 Do any containers show signs of deterioration or leaks?
- 3 Is the loading/unloading areas clean?

<u>Pass/Fail</u>	<u>Pass/Fail</u>
<u> </u>	<u> </u>
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<u> </u>	<u> </u>
Initials	<u> </u>
Day	<u> </u>

5.3.1 Waste Storage Area

- 1 Does the storage area show any signs of spills?
- 2 Do any containers show signs of deterioration or leaks?
- 3 Are all containers properly/clearly labeled?
- 4 Is the storage area clean, free of debris?
- 5 Are containers covered and stored properly?

<u>Pass/Fail</u>	<u>Pass/Fail</u>
<u> </u>	<u> </u>
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5.4.1 Hydrochloric Acid & Lacquer Thinner Loading Areas

- 1 Are there any signs of leaks or rust on valves or pipes?
- 2 Are there any problems that need repair? (if so, give the paint line supervisor a copy of the checklist)
- 3 Does the loading area w any signs of spills?
- 4 Is spill response equipment adequate and accessible?

<u>Pass/Fail</u>	<u>Pass/Fail</u>
<u> </u>	<u> </u>
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HYDROCHLORIC ACID LOADING AREA CHECKLIST

DATE____ THRU____ _

NAME OF EMPLOYEE COMPLETING CHECKLIST

MON PASS/FAIL		TUES PASS/FAIL		WED PASS/FAIL		THUS PASS/FAIL		FRI PASS/FAIL		
D	D	D	D	D	D	D	D	D	D	1. Are there any signs of leaks or rust on valves or pipes?
D	D	D	☐	D	D	D	D	D	☐	2. Are there any problems that need repair (if so give the paint line supervisor the checklist)?
D	D	D	D	D	D	D	D	D	D	3. Does the loading area show any signs of spills?
D	D	D	D	D	D	D	D	☐	☐	4. Is the loading area clean?
D	D	D	D	D	D	D	D	D	☐	5. Is there any trash that has not been properly disposed?

5 Minor Spills

Petroleum spills of less than 55 gallons are considered minor spills. Breaks in hydraulic lines, fuel leaks, and oil leaks on heavy equipment are considered minor spills.

Hydraulic line ruptures represents the most common clean-up situations. Dry clean up methods, such as applying absorbent material on spills, will be used where possible.

Hydraulic fluid stained soil and absorbent will be excavated with shovels, placed in drums, and handled as oil contaminated waste. Minor fuel spills will also be cleaned up using absorbent and soil excavation methods.

5.4 Significant Spills

Petroleum spills of between 55 gallons and 1,000 gallons are considered significant spills. Significant spills of waste oil, hydraulic oil, or diesel fuel will first be prevented from entering storm water outfalls by containment walls. Since it is such a short distance from fueling area to storm water drainage, if the spill is outside the containment wall the best BMP is prevention. It is essential that all overflow equipment be operating and that someone trained in emergency procedure be present during fueling operations.

5.5 Major Spills

Petroleum product spills of over 1,000 gallons are major spills. This spill situation is unlikely because all of the bulk petroleum products are stored within contained area. However, a major spill could happen during fueling, during refilling of bulk storage tank, or due to a tornado. Since it is such a short distance from fueling area to storm water drainage, if the spill is outside the containment wall the best BMP is prevention. It is essential that all overflow equipment be operating and that someone trained in emergency procedure be present during fueling operations.

In the event of a major spill, immediately follow the emergency checklist attached (section 5.7 and 5.8).

5.6 Spills Within Bermed Area(* only if a petroleum tank is installed)

Petroleum products spills may require dry clean-up with non-biodegradable absorbents as shown in the following figure. Larger spills can be pumped back into the bulk storage tank or recycled as waste oil.

5.7 Uncontaminated Spills

In the event of a spill of oil product or hazardous chemical escape to a waterway beyond the plant site, the following agencies will be notified immediately by Bill Hackensmith or his designee:

1. Water Division
ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
(309) 693-5463 Peoria Office - Jim Kammuehler
(217) 785-0833 Springfield Office - Kevin Greene
(217) 782-3637 Emergency Response Unit
2. Illinois Emergency Management Agency(IEMA)
(800) 782-7860
3. Local Emergency Planning Commission
4. National Response Center
(NRC)(800) 424-8802

The report should contain the following information.

1. The name, address, and telephone number of the facility and the party who is in charge of operations at the site.
2. The location of the spill or discharge including the name of the waterway involved.
3. The date and time of spill or discharge.
4. The type of material spilled or discharged.
5. An estimate of the quantity of material spilled or discharged and the basis of the estimate.
6. The extent of the actual and potential water pollution.
7. The steps being taken or proposed to contain and clean up the material.

5.8 Written Report

In the event a spill of more than 1,000 gallons of petroleum product occurs, or two significant spills occur in a twelve (12) month period, a written report must be submitted with the following information within sixty (60) days to EPA

1. Name of facility
2. Name of owner or operator
3. Location of facility
4. Date and year of initial operation
5. Maximum storage or handling capacity
6. Description of facility
 - a. Maps
 - b. Flow diagrams
 - c. Topographic maps
7. Complete copy of SPCC Plan (If there is aboveground gas/diesel/hydraulic tanks that apply to the SPCC plan.)

8. Cause of Spill
9. Corrective actions and/or countermeasures taken
10. Additional preventive measures taken or completed
11. Other information EPA may require
12. A copy of all information provided to EPA will be sent to IEPA.

SECTION 6 - SPECIAL INSTRUCTIONS

6.1 Certification of BMP

This Best Management Plan must be signed by the official representative of the facility who is: the owner, the sole proprietor of a sole proprietorship, a general partner for a partnership, or by a ranking elected official or other daily authorized representative for a unit of government or an executive of at least the level of vice president for a corporation, having overall responsibility for the operation of the facility.

CERTIFICATION: I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information including the possibility of fine or imprisonment for knowing violations.

<u>Randy Rendfeld</u>	<u>220 Hanna Dr</u>	<u>309 478-3857</u>
Name & Official Title (type or print)	Address	Area Code & Phone Number
<u>Randy Rendfeld</u>	_____	<u>3/1/22</u>
Signature		Date Signed