

**U.S. EPA, Region 5 Enforcement and
Compliance Assurance Division
77 West Jackson Street, Chicago, IL 60604**

UNPERMITTED INDUSTRIAL FACILITY STORMWATER INSPECTION CHECKLIST

Inspection Date(s):	June 8, 2022	
Time:	Entry: 12:00 p.m.	Exit: 2:15 p.m.
Weather Conditions:	Rainy	
Media/Program:	Water – Clean Water Act (CWA) §§ 301, 402 – Industrial Stormwater	
Operator Name:		
Owner Name:	Paul Kasperski	
Facility or Site Name:	Epix Tube Company	
Permit ID or Tracking # (leave blank if no permit):		
SIC Code(s) (Primary & Relevant Others):	3317	
Facility Address:	500 North Broadway	
(City, State, Zip Code)	Aurora, Illinois, 60505	
County:	Kane County	
Geographic Coordinates:	41.766879, -88.307662	
Operator Mailing address:	500 North Broadway, Aurora, Illinois 60505	
Owner Mailing address:	5800 Wolf Creek Pike, Dayton, Ohio 45426	
Regular Days/Hours of Operation:	6 days a week, 16 hours a day	
# of Employees at location:	22	
Size of Facility (in acres):	1.3 acres	
Receiving Water(s):	Indian Creek	
Date facility est. @ location:	Approximately 2009	
Onsite Representative:		
Name: Nancy Young	Title: Vice President – Aurora Office	Phone #: 937-529-4858
		Email:
Authorized Official:	→	Contacted? Not by EPA, but by Nancy Young
Name: Paul Kasperski	Title: Owner	Phone #:
		Email: pwk@clearlymachine.com
Additional Personnel Participating in Inspection:		
Name: Miguel Madrigal	Title: Plant Manager	
Inspector(s):		
Name(s): William Jones	Title: Wet Weather Program Mgr	Phone #: 312 886-6058
Jake Berger	Physical Scientist	312-353-8024
Inspection Report Author:		
Name: William Jones	Signature/Date: WILLIAM JONES	Digitally signed by WILLIAM JONES Date: 2022.08.02 07:30:53 -05'00'
Supervisor Review:		
Name: Molly Smith	Signature/Date: MOLLY SMITH	Digitally signed by MOLLY SMITH Date: 2022.08.01 16:54:00 -05'00'

SECTION I – INTRODUCTION

Purpose of the Inspection

The purpose of the inspection was to determine compliance with the industrial stormwater requirements under §§ 301 and 402(p) of the CWA and its implementing regulations found at 40 CFR Part 122.26. The inspection was (check one) ☒ unannounced ☐ announced and consisted of interviewing facility representatives, recording field observations, and taking photographs to document site conditions throughout the facility at the time of the inspection.

Opening Conference

- 1) Brief narrative documenting those present, introductions, and explanation of the purpose of the inspection.
Attendees: William Jones, Jake Berger, Miguel Madrigal, Nancy Young
- 2) Credentials presented to: Nancy Young
- 3) Confidential Business Information (CBI) collected: ☐ yes ☒ no
- 4) Facility has been individually notified by Permit authority or EPA that it is subject to stormwater permitting requirements? ☐ Yes ☒ No Describe: The facility representatives present were not aware of Industrial Stormwater Permits.
- 5) Has the Facility applied for an Industrial Stormwater Permit or a Waiver from the requirement to have one (such as through the filing of a No Exposure Certification)? ☐ Yes ☒ No Describe:
- 6) Overview of Facility (attach, if available):
 - a) Aerial of facility with immediate environs, especially any storm drain inlets and surface waters
☒ Yes ☐ No;
 - b) Site map showing industrial processes and locations ☐ Yes ☒ No; and
 - c) Facility schematics labeling industrial processes occurring onsite ☐ Yes ☒ No.

FACILITY'S OPERATION & PRODUCT DESCRIPTION

Brief description of business and industrial activities occurring throughout the site. Include operator's description and note any documentation that further establishes SIC code (permit applications, reports, business registries, website, etc).

Epix Tube in Aurora manufactures tube from sheets of metal by hot rolling and forming steel and galvanized steel. The Facility paints the tubes with acetone and a clear coat of paint. Additionally information can be found at: www.epixtube.com The facility sells the tubes.

Other industrial facilities owned/operated by same business entity? ☒ Yes ☐ No **Describe:** Epix Tube has a facility in Dayton, Ohio that employs around three to four times as many people as the Aurora location.

SECTION II – OBSERVATIONS

SITE EVALUATION

Pollutant Sources

Note location (including whether occurring indoor or outdoor, and whether outdoor areas are paved or unpaved), quantity/size, design issues, any operation and maintenance (O&M) deficiencies (including the nature and extent), potential pollutants, and evidence of exposure

	to stormwater. Are best management practices (BMPs) in place to minimize or eliminate stormwater discharges from industrial activities? If so, please describe.
Loading/Unloading Operations	The facility has tractor trailers unloading steel and picking up pipe and tubing on the south side of the building. There was also a tractor trailer parked near this area. The water was ponding near this area and had an oily sheen on it.
Industrial Manufacturing/Processing Operations	Epix manufacturing operations are located inside the buildings.
Industrial Machinery & Equipment Storage	
Storage of Industrial Materials or Products	
Liquid Storage (e.g., Tanks, Liquid Storage Drums)	Anti freeze is stored outside on the south side of the building in what appears to be a 55-gallon plastic container with an open lid and in a small bucket on the ground that is partially covered with a solid piece of material. Neither container had secondary containment and are just upslope of where the stormwater was running off the Facility into the stream. Miguel said that the Facility has a waste hauler come and take out the waste liquids, but did not know when they last picked up containers from the area on the west side of the Facility. To the west of the building (back of the building) there is a storage area of waste Toluene, waste acetone, and waste oil that is outside in 55-gallon drums. During the inspection, the Toluene and acetone drums were bulging at the top. Also, there were larger containers that were partially filled with Charcoal, which is what the Facility uses to cool their machinery. There were 55-gallon drums stored in a second smaller building near the entrance of the Facility.
Pollutant Sources	Note location (including whether occurring indoor or outdoor, and whether outdoor areas are paved or unpaved), quantity/size, design issues, any O&M deficiencies (including the nature and extent), potential pollutants, and evidence of exposure to stormwater. Are BMPs in place

	to minimize or eliminate stormwater discharges from industrial activities? If so, please describe.
Waste Storage/Disposal Areas (solid and/or hazardous)	To the west of the building (back of the building) there is a storage area of waste Toluene and waste acetone and waste oil that is outside in 55-gallon drums. At the time of the inspection, the Toluene and acetone drums were bulging at the top. Also, there were larger containers that were partially filled with Charcoal, which is what the Facility uses to cool their machinery. There were also 55-gallon drums stored in a second smaller building near the entrance of the site.
Waste Treatment Facilities (e.g., Pretreatment Systems)	
Fueling Stations/Equipment Maintenance Areas & Cleaning Areas	Near a southwestern corner of their building there was a black plastic container that was used to change oil. This container was left outside in the rain and there was an oily residue and sheen on the ground nearby the plastic container. Miguel stated that this was left by the contractor that they have come and change the oil on their three forklifts.
Sediment & Erosion Controls	
Spills/Leaks Handling	Facility reported that no spills have occurred.
Outside Shelters	☐ Temporary (Date Established _____) ☐ Permanent
OUTFALL, STORMWATER DISCHARGE & RECEIVING WATER OBSERVATIONS	
List any established stormwater discharge points. For each such discharge point, describe its location, the Facility areas it serves, Receiving Water/MS4 into which it discharges, Receiving Water appearance, date the discharge point was established, and evidence of present or past discharge (e.g., Facility records or visual evidence such as stains, deposits, ponding).	There is a manhole near the front of the Facility. In the manhole is a pipe that leads towards the stream to the south of the property. This receives water from the parking lot, sump pump discharge from the sump inside the Facility. There was rust colored staining on the ground from water that had drained to the manhole. On the north bank of Indian Creek, running along the Facility and just west of Broadway, there was a discharge coming from the Facility. There was a break in the barrier along the south side of the Facility that was discharging storm water into Indian Creek. Storm water drains to this area from the ponded area below the tractor trailers and from the area where the anti freeze was stored outside. An oily sheet was observed on top of the ponded water. See photos.

Note evidence of any discharge pathways from the Facility not otherwise noted above, and for each pathway, describe its location, slope, the Facility areas it may serve, evidence of past or present migration of pollutants offsite via the pathway (e.g., Facility records or visual evidence such as stains, deposits, ponding), Receiving Water/MS4, and Receiving Water appearance.	
Note evidence of any non-stormwater discharges, including process water discharges, from the Facility, and for any such discharge, describe its nature, source, discharge location, Receiving Water/MS4, Receiving Water appearance, and discharge authorization, if any.	

SECTION III – AREAS OF CONCERN

CITATION	DESCRIPTION	SUPPORTING INFORMATION
CWA § 301	Discharge without a permit. Water with rust was entering the storm drain inlet that led towards Indian Creek. Water with an oily sheen was also ponding on the Facility's site and then flowing off the south side of the Facility through a break in the berm and into Indian Creek.	See photographs.

SECTION IV – CLOSING CONFERENCE

Attendees:

Was CBI collected? ☐ Yes ☒ No Describe:

Summary of areas of concern(s) listed above:

From the Facility, EPA identified two discharges industrial stormwater without a permit via a storm drain and through a bermed area. Waste chemicals and antifreeze were stored outside where they could spill. A black plastic oil changing pan, stored outside, was identified, along with oil on the pavement. The inspectors also noted rusty sump water entering storm drain inlet.

SECTION V – LIST OF ATTACHMENTS (as identified in #6 above, where applicable)

Attachment A – Aerial of facility

Attachment B –Photograph Log