



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

SUBJECT: CLEAN AIR ACT INSPECTION REPORT
Steel Warehouse Company, LLC, South Bend, Indiana

FROM: Natalie Schulz, Environmental Engineer
AECAB (MN/OH)

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

TO: File

BASIC INFORMATION

Facility Name: Steel Warehouse Company, LLC

Facility Location: 2722 West Tucker Drive, South Bend, IN 46619

Date of Inspection: March 30, 2022

EPA Inspector(s):

1. Natalie Schulz, Environmental Engineer
2. Patrick Miller, Environmental Engineer

Other Attendees:

1. Paul Karkiewicz, Indiana Department of Environmental Management
2. Bob Hutchison, Pickle Plant and Kirkendoll Building Manager

Contact Email Address: bobh@steelwarehouse.net

Purpose of Inspection: Steel pickle plant inspection

Facility Type: Steel Pickling

Regulations Central to Inspection: Permit emission limits and operation practices. Facility is an area source and not subject to the NESHAP Subpart CCC for Steel Pickling facilities.

Arrival Time: 1:30 p.m.

Departure Time: 3:05 p.m.

Inspection Type:

- ☒ Unannounced Inspection
- ☐ Announced Inspection

OPENING CONFERENCE

- ☒ Presented Credentials
- ☒ Stated authority and purpose of inspection
- ☒ Provided Small Business Resource Information Sheet *See additional document attached to the email delivering this report.*
- ☐ Small Business Resource Information Sheet not provided.
- ☒ Provided CBI warning to facility

The following information was obtained verbally from Bob Hutchison unless otherwise noted.

Process Description:

Steel rolls, coils, and other materials are delivered to the facility via rail and truck. The rolls and coils are first cut, slit, and prepared for pickling. The pickling process uses hydrochloric acid (HCl). There are three acid baths and four recirculating tanks; the pickle line acid baths are held at 175 degrees to 180 degrees. A scrubber is attached to the pickle line. Holding tanks for acid are located outside of the pickling plant. The undiluted acid stored in the outdoor tanks is held at ambient air temperature. The steel is dried, prepared, and recoiled after being pickled. Sodium hydroxide is used in the facility's wastewater to treat it prior to sending it to the city's treatment center.

Staff Interview:

HCl comes to the facility at a concentration of 32 to 42%. The HCl is diluted with water prior to use in the pickling process, with the highest used concentration at 12.5% and the lowest concentration at 3%.

Scrubber liquid flow is set by the operators to 3 gallons per minute; the permit requires the facility to maintain the flow at or above 1.5 gallons per minute, until a stack test is completed. A stack test on the scrubber was completed about two years ago. The stack test results were not known at the time of the inspection but were requested, along with the pressure drop logs and scrubbing liquid flow logs. The drop pressure and the scrubbing liquid flow are recorded per shift; the permit requires the facility to record these values daily. Storage tanks are vented to the scrubber. The style of scrubber was changed in 2015.

TOUR INFORMATION

EPA Tour of the Facility: Yes

Data Collected and Observations:

The scrubber, its flow, and its pressure drop were observed. The observed flow value was 3 gallons per minute. To measure the drop pressure during the tour, the plant manager opened one valve completely and one valve partially. The observed value was approximately 11.7 inches of water. The permit requires the facility to respond when the pressure is outside of the normal range; under the permit, the normal range for the scrubber is 11.0 to 16.0 inches of water unless different values are determined during the most recent stack test.

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

Field Measurements: were not taken during this inspection.

CLOSING CONFERENCE

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

Requested documents:

- Most recent scrubber stack test results
- SDS Sheets for hydrochloric acid and oil
- Tank list for hydrochloric acid, including the capacity and installation date
- 3 months of water flow, drop-cross pressure, and monthly maintenance records on the scrubber
- Date of when scrubber changed styles

DIGITAL SIGNATURES

Report Author: **NATALIE SCHULZ**  Digitally signed by NATALIE SCHULZ
Date: 2022.05.24 17:15:23 -05'00'

Section Supervisor: **Brian Dickens**  Digitally signed by Brian Dickens
Date: 2022.05.25 06:48:58 -05'00'

Facility Name: Steel Warehouse Company, LLC

Facility Location: 2722 West Trucker Drive, South Bend, Indiana 46619

Date of Inspection: March 30, 2022

APPENDICES AND ATTACHMENTS

- 1.* Appendix A: Digital Image Log

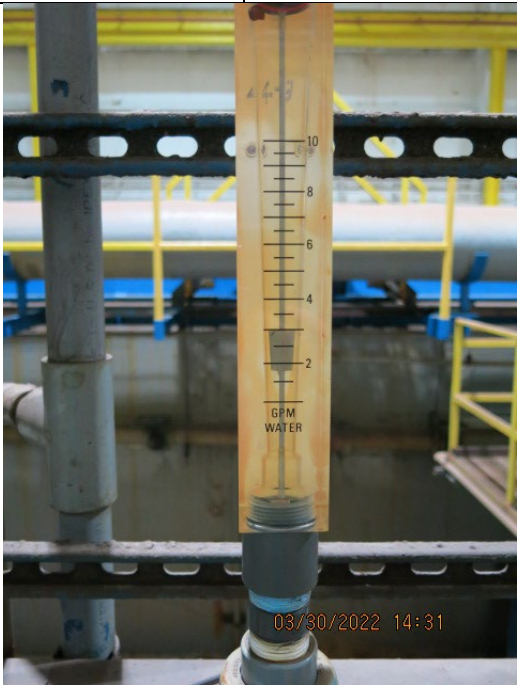
Facility Name: Steel Warehouse Company, LLC

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APPENDIX A: DIGITAL IMAGE LOG

1. Inspector Name: Patrick Miller	2. Archival Record Location: C:\Users\nschulz\Environmental Protection Agency (EPA)\Miller, Patrick - Steel Warehouse
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Image Number	File Name	Date and Time (incl. Time zone and DST)	Description of Image
	IMG_0639.JPG	2:31 PM EST	Scrubber water flow meter

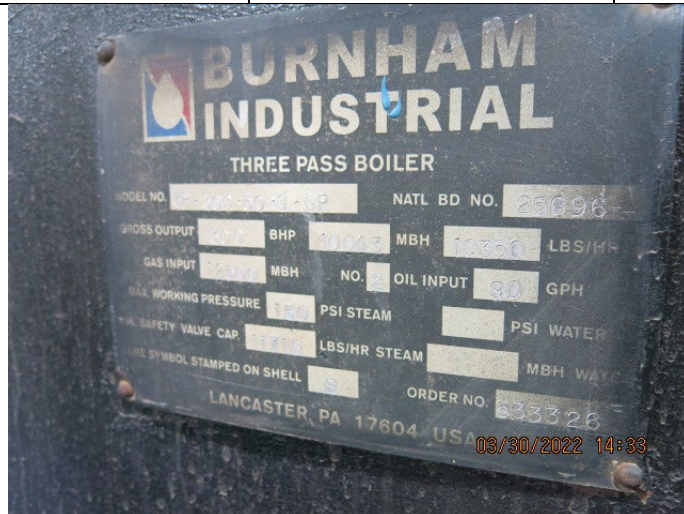
Facility Name: Steel Warehouse Company, LLC

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Date of Inspection: March 30, 2022



2	IMG_0640.JPG	2:32 PM EST	Drop pressure gauge
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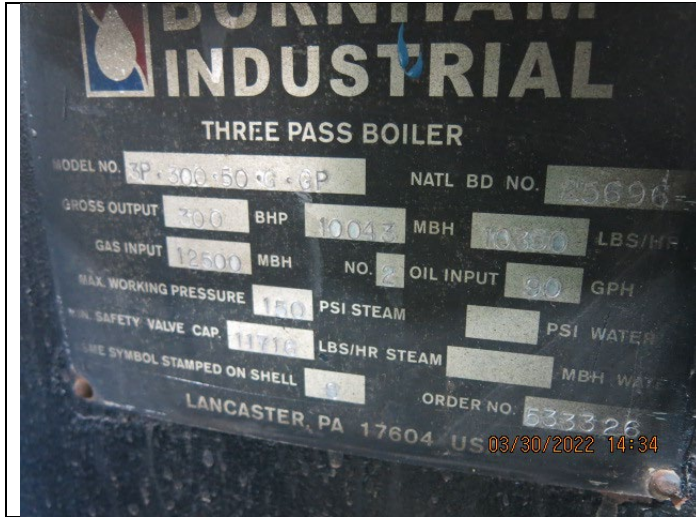


3	IMG_0641.JPG	2:33 PM EST	Boiler specifications
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Facility Name: Steel Warehouse Company, LLC

Facility Location: 2722 West Trucker Drive, South Bend, Indiana 46619

Date of Inspection: March 30, 2022



4	IMG_0642.JPG	2:34 PM EST	Boiler specifications
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