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):	May 3, 2022	
Time:	**Entry:** 9:48 a.m.	**Exit:** 1:05 p.m.
Weather Conditions:	Rainy	
Media/Program:	Water – CWA §§ 301, 402 – Industrial Stormwater	
Operator Name:	Rondout Iron and Metal	
Owner Name:	Sims Metal, Inc	
Facility or Site Name:	Rondout Iron and Metal	
Permit ID or Tracking # (leave blank if no permit):	ILR005968	
SIC Code(s) (Primary & Relevant Others):	5093, Subpart N and Sector N	
Facility Address:	13604 Rockland Road	
(City, State, Zip Code)	Lake Bluff, Illinois 60044	
County:	Lake	
Geographic Coordinates:	42.280366 N -87.897405 W	
Operator Mailing address:	13604 Rockland Road, Lake Bluff, Illinois 60044	
Owner Mailing address:	2500 South Paulina Street	
Regular Days/Hours of Operation:	M-F 7:30 a.m.-3:20 p.m.	
# of Employees at location:	Unknown, but the facility is part of a larger company with over 200 sites.	
Size of Facility (in acres):	1.9	
Receiving Water(s):	North Bank of the Chicago River	
Date facility est. @ location:	Unknown	
Onsite Representative:		
Name: Juliann Kramer	Title: Environmental Specialist	Phone #: 773-650-6492
		Email**:** **Juliann.kramer@simsmm.com**
Authorized Official: →	Contacted? ☐Yes ☒No.	
Name: George Malamis	Title: General Manager	Phone #:
		Email**:** **George.malamis@simsmm.com**
Additional Personnel Participating in Inspection:		
Name: Joe Nelson	Title: Yard Supervisor	
Inspector(s):		
Name(s): William Jones	Title: Wet Weather Program Manager	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: 2022.06.28 11:21:41 -05'00'	

Supervisor Review:	
Name: Molly Smith	Signature/Date: MOLLY SMITH Digitally signed by MOLLY SMITH Date: 2022.06.28 20:00:24 -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: Juliann Kramer and Joe Nelson were present at the opening. Ms. Kramer indicated that they have an industrial storm water permit. Juliann stated that 2017 was the date of the last Stormwater Pollution Prevention Plan (SWPPP), and that the SWPPP was being revised as of April 2022.

   The purpose was to conduct an industrial storm water inspection.

2) Credentials presented to: Juliann Kramer
3) Confidential Business Information (CBI) reviewed: ☐yes ☒no
4) Facility has been individually notified by Permit authority or EPA that it is subject to stormwater permitting requirements? ☐Yes ☐No Describe: unknown

   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: The facility is owned by Simms metal management, so they are over 100 employees. Facility claims they have coverage under ILR005968. Notice of Intent was dated 10/27/21, but no reply from IEPA. Enforcement and Compliance History Online (ECHO) shows permit expired 4/30/14.
5) 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).

Rondout Iron and Metal is owned by Sims metal, which is a business division of Sims Limited. Sims has over 4000 employees. Joe Nelson stated that Rondout buys and sells scrap metal, mainly ferrous, but also copper and other metals.

Ms. Kramer stated that they are a feeder yard. They have lead acid batteries, storage for DEF (Diesel Exhaust Fluid), and antifreeze. They refuel here and storm water flows to the north end of the site to a storm water receptacle and then it is filtered to a dewatering bag and then it flows to an infiltration area. Ms. Kramer does inspections.

Mr. Nelson said that they shear copper pipe. Batteries and other fluids were stored inside and cutting is done inside.

Other industrial facilities owned/operated by same business entity? ☒Yes ☐No Describe: over 200 facilities world-wide are owned by Sims.

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	Scrap metal is unloaded from vehicles outside. They purchase ferrous and non-ferrous scrap metal and electronic waste.
Industrial Manufacturing/ Processing Operations	The processing operations are bailing and shearing according to the company's website. The company has facilities indoor for shearing.
Industrial Machinery & Equipment Storage	The company has a car crusher located outside by the storm water collection area on the north end of the site.

Storage of Industrial Materials or Products	Scrap metal. A few vehicles. See photos.
Liquid Storage (e.g., Tanks, Liquid Storage Drums)	Tanks storing fuel and oil are located next to the stormwater collection area on the north side of the site. See photos.
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)	The facility stores scrap metal outdoor in the central and western portions of the site. Gasoline and oil are stored on the north end of the site. Nearby this storage area fluids are drained from vehicles. See attachment A and attached photos.
Waste Treatment Facilities (e.g., Pretreatment Systems)	Straw bales are used in the storm water collection area. Water is pumped from this area to a dewatering bag that was broken. Water is then drained to an infiltration area. The straw bales are improperly oriented around the pump (see photos).
Fueling Stations/Equipment Maintenance Areas & Cleaning Areas	There is secondary containment around a fuel tank shown as FAST-1 in attachment A. Water in the secondary containment is pumped onto the ground, according to Mr. Nelson.
Sediment & Erosion Controls	

Spills/Leaks Handling	
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).	The facility pumps water from a detention area to a dewatering bag. The dewatering bag was broken and not filtering the water. See photos. The water then flowed to an infiltration area. The water level was an inch or two below the top of a low rock berm on the north side. If the water flows over this berm it would reach a ditch that runs along the railroad tracks and flows to the north branch of the Chicago River. See photos and attachment A.
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
General permit F.1	The permittee must implement Best Management Practices (BMPs).	Housekeeping - Scrap material was outside of storage areas.

		Used motor oil, hydraulic fluid, and antifreeze did not have secondary containment. Secondary containment for the red gasoline tank appeared to be too small. See photo 5. Straw bales were not properly oriented. Filter bag needed replacing since it was ripped, and water was not being filtered. See photos. Industrial Storm water is within inches of overflowing the top of the berm on the north end of the site.

SECTION IV – CLOSING CONFERENCE

Attendees: Ms. Kramer, Mr. Nelson, Mr. Jones, Mr. Berger

Was CBI collected? ☐Yes ☒No Describe:

Summary of areas of concerns listed above. Additionally, preliminary findings were discussed during the closing conference and listed below:

- EPA inspection team did not see any annual inspection reports on site. Ms. Kramer was not able to produce a copy of the 2017 SWPPP on site, but there was an older version on site.
- Housekeeping and implementation of BMPs was identified as an area of concern. Specifically highlighted was the area by the roll off containers and just outside of the fence by the North Branch of the Chicago River.
- The roll off by the North Branch of the Chicago River had machined metal. The metal appeared oily and was spilling out near the fence and River.
- EPA noted an oil changing stand with the vehicle out in the open, without a cover.
- EPA noted a drum and tanks near the oil changing stand that did not have secondary containment.
- EPA noted strawbales were improperly installed on the north end of the site around the "storm water receptacle".
- EPA saw torn dewatering bag that were not functioning, as water was pumped into them.
- The EPA inspection team was unable to view the drafted, April 2022, update to the SWPPP.
- Ms. Kramer said that the facility had an extra dewatering bag and would replace it after the EPA inspection team left the site.

The EPA inspection team requested a copy of the 2017 SWPPP.

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

Attachment A – Aerial of facility from SWPPP
Attachment B – Photograph Log