



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

DATE: See Date of Section Chief Signature Below

SUBJECT: CLEAN AIR ACT INSPECTION REPORT
Calumet Tank & Equipment, Chicago, IL

FROM: Emma Leeds, Environmental Engineer
AECAB (IL/IN)

THRU: Nathan Frank, Section Chief
AECAB (IL/IN)

TO: File

BASIC INFORMATION

Facility Name: Calumet Tank & Equipment (Calumet)

Facility Location: 12440 S Stony Island, Chicago, IL 60633

Date of Inspection: 8/4/2021

EPA Inspector(s):

1. Emma Leeds, Environmental Engineer
2. Karina Kuc, Environmental Engineer
3. Daniel Heins, Environmental Scientist

Other Attendees:

1. Jorge Garcia, Tank Wash Manager, Calumet
2. Kathy Fancher, Chief Financial Officer, Calumet
3. Mohammed Ammra, Environmental Engineer, Illinois Environmental Protection Agency (IEPA)

Contact Email Address: dfancher@calumetcontainer.com

Purpose of Inspection: To determine compliance with the Clean Air Act and relevant regulations and to determine if the facility requires air permits

Facility Type: Tank cleaning & heating

Regulations Central to Inspection: 35 IAC Part 218 Subpart TT: Organic Material Emission Standards and Limitations for the Chicago Area

Arrival Time: 2:30 PM

Departure Time: 4:15 PM

Inspection Type:

- ☒ Unannounced Inspection
- ☐ Announced Inspection

OPENING CONFERENCE

- ☒ Presented Credentials
- ☒ Stated authority and purpose of inspection
- ☒ Provided Small Business Resource Information Sheet via email on 8/5/2021
- ☒ Provided CBI warning to facility

The following information was obtained verbally from Calumet personnel unless otherwise noted.

Process Description:

Calumet is a trailer tank and ISO container washing facility that cleans an estimated 55 – 60 tanks per day at four identical bays. Tanks are brought into a bay, vented of excess pressure, and inspected for excess product remaining in the tank referred to as heel. Calumet either empties heel into on-site waste drums or returns the tank to the owner to recover their product. Once emptied of heel, tanks are heated to up to 200 degrees Fahrenheit and cleaned using steam, hot water, and occasionally detergent and acetone. After cleaning, the insides of the tanks are dried with a blower and then visually inspected to ensure sufficient cleaning before the tanks are returned to their owners. Calumet also provides heating services for tanks if necessary, which are then brought back to the facility for cleaning once emptied.

Staff Interview: Calumet has 22 employees and is in operation twenty-four hours, seven days a week. Before accepting a tank, Calumet requires the customer to provide the Safety Data Sheet (SDS) for the materials previously stored in the tank. Calumet does not accept tanks that previously contained lead, zinc, cyanide, or oils with polychlorinated biphenyls (PCBs). The most common materials in the tanks cleaned by Calumet include epoxy resin, fatty acid, latex, motor oil, and sodium methyllate. Resins take the longest to clean at approximately 1.5 hours.

Tanks are typically cleaned with the garage doors of the bays open, with any vapors from the cleaning process released directly to the atmosphere. During the winter, the garage doors of the bays are closed, and a ventilation system on the roof of the bays releases any vapors to the atmosphere.

Calumet uses approximately one 55-gallon drum of acetone per week in their cleaning process. Calumet stopped using caustic wash to clean tanks about two to three years ago.

Each bay has a drain that leads to the on-site wastewater treatment system. The system includes three settling and sludge decant tanks and one mix tank, ranging from 4,500 – 9,000 gallons in size, and utilizes sulfuric acid, aluminum sulfate, clay polymer, and lime. Solids from the sludge and mix tanks are pumped to an on-site sludge box and shipped off-site every two weeks.

Calumet personnel were unaware of any air permits ever issued to the facility.

TOUR INFORMATION

EPA Tour of the Facility: Yes

Data Collected and Observations:

Mr. Garcia lead EPA inspectors on a tour of the facility, starting with the bays. Two tank trailers and one ISO container with dimethyl carbonate were being cleaned at the time of the inspection. Inspectors next observed the wastewater pumphouse and then walked through the wastewater treatment system, where the three settling tanks were in operation but the mix tank was not. Moving back outside, inspectors observed the area to the north of the bays where tanks are pre-heated. About five tanks were being pre-heated at the time of the inspection. Finally, inspectors observed the boiler room. Mr. Garcia shared that the facility has one standby generator and two natural gas 300 horsepower boilers. Only one boiler was in operation at the time of the inspection.

Photos and/or Videos: were not 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:

At the time of the inspection, facility manager and primary contact for the facility Dale Fancher was out. EPA emailed Mr. Fancher for the below follow-up information on August 20th, 2021.

- Facility site map
- Wastewater treatment system information, including tank sizes, average throughput, and water sampling results
- Capacities of the boiler and standby generator
- An excel spreadsheet with information about each tank cleaned by the facility for a week, including the previous material in the tank
- SDSs for the five most common materials cleaned from tanks, as well as for the detergent and acetone used in the cleaning process

Concerns: Mr. Ammra of IEPA expressed concerns that Calumet may need air permits for their two boilers.

DIGITAL SIGNATURES

Report Author: **EMMA
LEEDS**

Digitally signed by EMMA
LEEDS
Date: 2021.09.23
17:42:14 -05'00'

Section Chief: **NATHAN
FRANK**

Digitally signed by
NATHAN FRANK
Date: 2021.09.28
16:21:27 -05'00'