



REGION 5

CHICAGO, IL 60604

MEMORANDUM

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

FROM: Sasha Letuchy, Environmental Engineer
AECAB (MI/WI)

THRU: Sarah Marshall, Section Supervisor
AECAB (MI/WI)

TO: File

BASIC INFORMATION

Facility Name: Calumet Tank & Equipment

Facility Location: 12440 S Stony Island Ave, Chicago, Illinois 60633

Date of Inspection: June 26, 2024

EPA Inspector(s):

1. Sasha Letuchy, Environmental Engineer
2. Erin DuMontelle, Environmental Engineer
3. Giles Chickering, Environmental Engineer

Other Attendees:

1. Dale Fancher, III, General Manager
2. Preston Forys, Environmental Manager (joined for closing conference only)

Contact Email Address: dfancher@calumetcontainer.com, pforys@calumettank.com

Purpose of Inspection: Determine compliance with the Clean Air Act and the Illinois State Implementation Plan (SIP) requirements related to volatile organic carbons (VOCs) for tank and truck washing facilities

Facility Type: Truck washing

Facility Name: Calumet Tank & Equipment
Facility Location: 12440 S Stony Island Ave, Chicago, Illinois 60633
Date of Inspection: June 26, 2024

Regulations Central to Inspection: Clean Air Act (CAA) and the Illinois SIP

Arrival Time: 8:55 AM

Departure Time: 10:25 AM

Inspection Type:

- ☒ Unannounced Inspection
- ☐ Announced Inspection

OPENING CONFERENCE

- ☒ Presented Credentials
- ☒ Stated authority and purpose of inspection
- ☒ Provided Small Business Resource Information Sheet: sent with inspection report
- ☐ Small Business Resource Information Sheet not provided.
- ☒ Provided CBI warning to facility

The following information was obtained verbally from Dale Fancher, III unless otherwise noted.

Process Description:

Calumet Tank & Equipment (the facility) is a tank washing facility. The facility provides these services for tank trailers and International Organization for Standardization (ISO) containers. Materials formerly held in the containers include latex, paints, fatty acids (wax), soaps, resins, oils, glycols, solvents (toluene, iso propyl alcohol), adhesives, slurries, distillates, and mineral spirits. Containers that formerly contained certain materials cannot be washed and are identified on the facility's Do Not Wash list.

Residuals are removed from the containers prior to cleaning, collected, and sent off for disposal.

Cleaning operations differ depending on the material formerly contained. Cleaning operations can consist of steaming, steaming and hot water, steam and detergent (in hot water), detergents with additives, and a simple rinse. Hot water is kept at 180 – 190 °F.

Container washing occurs in four bays; Bays 3 and 4 are dedicated to latex/paint. Washes take approximately 45 minutes to two hours depending on the material formerly contained. Wastewater from the wash step in six of the bays is collected in floor drains and is pumped to the wastewater treatment plant (WWTP). No wash water is recycled back into the process.

Trucks that need to be washed can be onsite for several days. The facility does not store any containers that are full onsite.

Road dust is controlled during dry months using a spray truck and calcium chloride, applied as a dust suppressant 1-2 times per year.

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Staff Interview:

The facility has 19 employees and operates Monday – Friday, 24 hours per day, and Saturday and Sunday from 8AM – 8PM.

Approximately 50 – 60 trucks can be washed in 24 hours. Prior to 2020, the Facility stated that they were cleaning higher numbers of tanks.

Calumet Tank & Equipment has not conducted any stack testing. They are covered under a ROSS permit and conducted emission calculations during the permitting process, but do not update the calculations annually.

Personal protective equipment is specified when washing the tanks depending on the previously contained materials; employees are required to wear half-mask respirators while cleaning some tanks.

TOUR INFORMATION

EPA Toured the Facility: Yes

Data Collected and Observations:

EPA toured the facility starting with the wash bays. Wash bays 1 – 4 are collocated in one building and were all in use. There were two pull behinds in Bay 4 and 3, a double ISO trailer with two containers in Bay 2, and one pull behind in Bay 1.

There is an exhaust point above each bay which is equipped with a fan. The bay doors are left open during the summer and closed during the winter. None of the bays at the Facility have controls for the emissions created during the cleaning process.

Two wash water drains are located in each bay.

Wash liquids are shared for Bay 3 and 4 and include cold water, hot water (at 190 °F), detergent (at 188 °F) and detergent (195 °F).

Photos and/or Videos: were taken during the inspection and are listed in Appendix A.

CLOSING CONFERENCE

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

Requested documents:

- The Ross Permit and IEPA approval of application;
- Calculations that were used for the Ross Permit application;
- Annual calculation of air emissions from the facility (2020 – 2023);

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- Do not wash list; and
- Washed Trailer Logs for the past year (June 2023 to June 2024), in an excel or compatible format. On the log, indicate the contents of the material formerly contained in the trailer. For contents identified by trade name, provide the chemicals or mixture of chemicals in the container or copies of the technical data sheet (or SDS).

Concerns: EPA stated that it was generally concerned with VOC emissions from washing operations and lack of controls. The facility indicated that it washed very few containers that formerly contained solvents.

DIGITAL SIGNATURES

Report Author: **ALEXANDR A LETUCHY** Digitally signed by
ALEXANDRA LETUCHY
Date: 2024.08.20
15:12:37 -05'00'

Section Supervisor: **SARAH MARSHALL** Digitally signed by
SARAH MARSHALL
Date: 2024.08.21
08:07:20 -05'00'

APPENDICES

1. Appendix A: Digital Image Log and Digital Video Log

Facility Name: Calumet Tank & Equipment
Facility Location: 12440 S Stony Island Ave, Chicago, Illinois 60633
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APPENDIX A: DIGITAL IMAGE LOG AND DIGITAL VIDEO LOG

Inspector Name: Erin DuMontelle **Archival Record Location:** *Electronic Records
Center\Enf_CalumetTank&Equipment_IL_24\Enf_CalumentTank
&Equipment_IL_24_Insp\Photos*

Image Number	File Name	Date and Time (incl. Time zone and DST)	Description of Image
1	P6260001.JPG	6/26/2024 9:50 AM CT	Bay 4 truck washing
2	P6260002.JPG	6/26/2024 9:55 AM CT	Wash water tanks in Bay 3/4
3	P6260003.JPG	6/26/2024 9:55 AM CT	Exhaust of Bay 4
4	P6260004.JPG	6/26/2024 9:58 AM CT	Front ISO in Bay 2 being steamed
5	P6260005.JPG	6/26/2024 9:59 AM CT	Detergent and hot water in Bay 2
6	P6260006.JPG	6/26/2024 10:02 AM CT	WWTP
7	P6260007.JPG	6/26/2024 10:26 AM CT	Bay 1 - 4