



REGION 5

CHICAGO, IL 60604

MEMORANDUM

SUBJECT: CLEAN AIR ACT INSPECTION REPORT
Calumet Container Corp., Chicago, IL

FROM: Erin DuMontelle, Environmental Engineer
AECAB (MI/WI)

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

TO: File

BASIC INFORMATION

Facility Name: Calumet Container Corp.

Facility Location: 12158 S Stony Island Avenue Chicago, IL 60633

Date of Inspection: October 25, 2023

EPA Inspector(s):

1. Erin DuMontelle, Environmental Engineer
2. Sasha Letuchy, Environmental Engineer

Other Attendees:

1. Kevin McGuffey, Manager
2. Dale Fancher, General Manager

Contact Email Address: kmcguffey@calumetcontainer.com

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

Facility Type: Transportation Company

Regulations Central to Inspection: Clean Air Act and Illinois' SIP

Arrival Time: 1:30 pm CDT

Departure Time: 2:52 pm CDT

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Inspection Type:

- ☒ Unannounced Inspection
- ☐ Announced Inspection

OPENING CONFERENCE

- ☒ Presented Credentials
- ☒ Stated authority and purpose of inspection
- ☒ Provided Small Business Resource Information Sheet with this report
- ☒ Provided CBI warning to facility

The following information was obtained verbally from representatives of Calumet Container Corp unless otherwise noted.

Company Ownership: The company has not changed ownership in the last 5 years.

Process Description:

Calumet Containers Corp. (the facility or Calumet) is a storage and maintenance facility for ISO shipping containers. ISO containers are a type of containment that is standardized by the International Organization for Standardization and utilized for intermodal transportation between ship, rail, and truck. Calumet is a hub that works with customers to provide a place to store ISO tanks on-site for an undetermined amount of time, from a couple days to over a year until the customer reaches out to have them removed from the site and shipped elsewhere. If the tanks arrive and need basic maintenance or the tanks are required to be prepped for shipment with certain components, the facility has a covered warehouse area that allows for maintenance such as valve replacements, pressure testing, or small surface repairs. The facility does not have cleaning services onsite.

Staff Interview:

The facility has been providing its services since 2001. Calumet is open 8:00 AM to 5:00 PM Monday through Friday, and there are 13 employees on-site, comprised of repair techs, lift guys, and office personnel. The customers are repeats with long-term relationships with the company, and all communication is done through emails. Yearly rates for different tasks that need to be done for the ISO tanks are given to the customer. These rates include lifting the tank, daily storage rates, and maintenance/labor that is required on the tank. The customer reaches out to Calumet Container Corp. with arrival paperwork that notes that they plan to send tanks to the site. The tanks could arrive within the following days or after multiple months. The arrival paperwork will include the cleaning certificate, a possible pressure test, and SDS sheets that denote what the container previously or currently contains.

The facility receives an average of 30 tanks a day, but this is flexible based on market demand. When the truck comes onsite, the facility puts the information for the tank into their inventory system. Each tank is inspected from the outside and all damages or issues are photographed and noted within the inventory system. The tanks can arrive empty and clean, but the facility also accepts dirty tanks with a heel or full containers. Dirty tanks and full containers are kept onsite temporarily, usually less than one week. Dirty tanks with a heel are washed offsite and returned to the facility. Full containers

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are to be returned to the customer for product removal. The facility will deny any tank on arrival that does not have arrival paperwork though. During these instances, the delivery truck will wait outside the facility's gate until the correspondence with the customer delivers the required paperwork. In certain cases, the ISO tanks will be brought back on-site; others leave with the delivery truck to either another site or back to the customer. There are certain tanks that the facility will deny if they are deemed too dangerous.

TOUR INFORMATION

EPA Tour of the Facility: Yes

Data Collected and Observations:

The ISO tanks that are brought onsite are stacked throughout the yard. There were four ISO tanks within the maintenance warehouse. A Calumet Container Corp representative noted that there were between 900 and 1000 ISO tanks being stored on-site during the day of the inspection. The representative also noted that the iPad used to check-in the trucks has access to the yard inventory list. Any tank can be referenced based on its outside information. Noteworthy tanks are flagged within the system and red-lined within the inventory system.

Photos and/or Videos: were not taken during the inspection.

RECORDS REVIEW

EPA reviewed example arrival documents from a customer that showed an incoming set of tanks that include their UN Number as well as the current status of the tanks. There is also a spot to include instructions on maintenance that would need to be completed for the tanks upon arrival.

CLOSING CONFERENCE

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

Requested documents:

The inventory records of all tanks that have come on to the site since January 1, 2019 with details regarding dates of arrival and removal and possible contents and their shipping. A call from Calumet to EPA on October 26, 2023 following the follow-up email concluded that EPA will accept the previous month's data instead of the last 5 years with the ability to request other months if needed.

DIGITAL SIGNATURES

 Digitally signed by ERIN
DUMONTELLE
Date: 2023.12.15 12:05:50
-06'00'

Report Author: _____

 Digitally signed by SARAH
MARSHALL
Date: 2023.12.15 12:10:33
-06'00'

Section Supervisor: SARAH MARSHALL