



REGION 5

CHICAGO, IL 60604

MEMORANDUM

SUBJECT: CLEAN AIR ACT INSPECTION REPORT
Steel Warehouse of Ohio, Cleveland, Ohio

FROM: Matthew Walters, Environmental Engineer
AECAB (MN/OH)

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

TO: File

BASIC INFORMATION

Facility Name: Steel Warehouse of Ohio

Facility Location: 3193 Independence Road, Cleveland, OH 44105

Date of Inspection: April 25, 2024

EPA Inspector(s):

1. Matthew Walters, Environmental Engineer
2. Carlo Demma, Physical Scientist

Other Attendees:

1. Steven Balog, Quality Manager, Steel Warehouse of Ohio
2. Matt Woodward, Production Supervisor, Steel Warehouse of Ohio
3. Jamie Sobonya, Environmental Consultant, HZW

Contact Email Address: steven.balog@steelwarehouse.net, jdietz@hzwenv.com

Purpose of Inspection: HCl pickling line inspection

Facility Type: Steel pickling

Regulations Central to Inspection: Federally enforceable PTIO conditions (Permit No. P0128786)

Arrival Time: 8:15 a.m.

Departure Time: 9:25 a.m.

Inspection Type:

- ☐ Unannounced Inspection
- ☒ Announced Inspection

OPENING CONFERENCE

- ☒ Presented Credentials
- ☒ Stated authority and purpose of inspection
- ☒ Small Business Resource Information Sheet not provided. Reason: Not a small business.
- ☒ Provided CBI warning to facility

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

Process Description:

The facility has one HCl pickling line that was constructed in 2019. The facility normally operates from 6 a.m. to 4:30 p.m., Monday through Friday. Sheet steel produced at Steel Warehouse's adjacent main plant is received at the facility and staged for pickling. The facility does not perform any prewashing or shot blasting operations prior to pickling. The pickling line consists of one acid tank and one rinse tank. The acid tank is broken into stages to allow the HCl concentration to change as the steel plates move through the line, with 13% being the strongest HCl concentration used. The pickling line is enclosed, with emissions routed to a single stage scrubber. A blower at the exit of the pickling line removes rinse water and then rust inhibitor is applied to the steel sheet at the oiler machine.

TOUR INFORMATION

EPA Toured the Facility: Yes

Data Collected and Observations:

- Sheet steel was being pickled at the time of the inspection, with the acid tank operating at approximately 145°F. Inspectors did not observe any significant fugitive steam leaks from the pickling line enclosure.
- Inspectors observed the operation of the oiler at the end of the pickling line:
 - The surface of the steel plates was dry upon entering the oiler.
 - No oil overspray was observed.
 - Rags were positioned around the oiler to absorb oil drips.
 - Facility personnel indicated that a hydrostatic oiler was on order to provide better control of oil application.

- PTIO condition C.1(d)(2) states that the scrubber pressure drop shall be between 6 and 12 inches of water, scrubber liquid flow rate shall be not less than 2.0 gallons per minute when the emissions unit is in operation, and pH of the water flowing into the scrubber shall be maintained at a pH of not less than the pH of the incoming municipal water.
 - Inspectors observed the following continuously monitored scrubber parameters:
 - 7.5 inches of water scrubber pressure drop measured by a Magnehelic differential pressure gauge.
 - 2.8 gallons per minute of municipal makeup water measured by a rotometer.
 - Inspectors observed a sample port on the scrubber liquid circulation line where the facility takes grab samples to measure pH at an onsite lab. The pH probe in the lab was stored in pH 7 calibration solution at the time of the inspection.
- The “wet section” of the facility had drums containing an oil/water mixture and an anti-foam, two 10,000 gallon fresh HCl storage tanks, and two rust inhibitor storage tanks.

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

Field Measurements: were not taken during this inspection.

CLOSING CONFERENCE

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

Requested documents:

- The following daily scrubber records for each operating day from February 1st through April 25th:
 - Pressure drop (inches of water)
 - Flow (gallons per minute)
 - pH
- Pickling line stack test report
- Pickling line PTE calculations
- SDS for rust inhibitor oil
- Raw material HCl concentration

DIGITAL SIGNATURES

Report Author: **MATTHEW WALTERS**  Digitally signed by MATTHEW WALTERS
Date: 2024.05.30 15:54:23 -05'00'

Section Supervisor: **BRIAN DICKENS**  Digitally signed by BRIAN DICKENS
Date: 2024.05.31 09:28:30 -05'00'

APPENDICES

A. Digital Image Log

APPENDIX A: DIGITAL IMAGE LOG

Inspector Name: Carlo Demma

Archival Record Location: *R5 Electronic Record Center\AECAB Library\Enf_Steel Warehouse
Independence_OH_24\Inspection_2024.04.25\Photos*

Image Number	File Name	Date and Time (EDT)	Description of Image
1	IMG_0555.JPG	2024:04:25 09:06:36	Scrubber Magnehelic differential pressure gauge
2	IMG_0556.JPG	2024:04:25 09:08:45	City water line to scrubber makeup flow rotameter
3	IMG_0557.JPG	2024:04:25 09:08:56	Rotameter for scrubber makeup flow
4	IMG_0558.JPG	2024:04:25 09:10:17	Sample port for pH grab samples on scrubber liquid circulation line
5	IMG_0559.JPG	2024:04:25 09:12:39	Scrubber blower and stack
6	IMG_0560.JPG	2024:04:25 09:12:39	Scrubber blower and stack