



**U.S. EPA, Region 5 Enforcement and  
Compliance Assurance Division  
77 West Jackson Street, Chicago, IL 60604**

**UNPERMITTED INDUSTRIAL FACILITY STORMWATER INSPECTION REPORT**

<b>Inspection Date(s):</b>			5/3/2022		
<b>Time:</b>			<b>Entry: 9:40 AM</b>		<b>Exit: 10:35 AM</b>
<b>Weather Conditions:</b>			Light rain, Temperature 45°F		
<b>Media/Program:</b>			Water – CWA §§ 301, 402 – Industrial Stormwater		
<b>Operator Name:</b>			Welch Bros., INC.		
<b>Owner Name:</b>			Brad Welch		
<b>Facility or Site Name:</b>			Welch Bros., INC.		
<b>Permit ID or Tracking # (leave blank if no permit):</b>					
<b>SIC Code(s) (Primary &amp; Relevant Others):</b>			3441		
<b>Facility Address:</b>			333 Hammond Ave.		
<b>(City, State, Zip Code)</b>			Elgin, IL		
<b>County:</b>			Cook and Kane Counties		
<b>Geographic Coordinates:</b>			Lat/Long: 42.015294, -88.271280		
<b>Operator Mailing address:</b>			1050 St. Charles Street, P.O. Box 749, Elgin, IL 60121-0749		
<b>Owner Mailing address:</b>			1050 St. Charles Street, P.O. Box 749, Elgin, IL 60121-0749		
<b>Regular Days/Hours of Operation:</b>			6:00 am – 4:00 pm, Monday - Saturday		
<b># of Employees at location:</b>			11		
<b>Size of Facility (in acres):</b>			4 acres		
<b>Receiving Water(s):</b>			Poplar Creek		
<b>Date facility est. @ location:</b>					
<b>Onsite Representative:</b>					
Name: Brad Welch		Title: Owner		Phone #: 847-741-6134	
				Email:	
<b>Authorized Official:</b>			→ Contacted? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
Name: Nick Martinec		Title: Operations Manager		Phone #: 847-741-6134	
				Email: <a href="mailto:nmartinec@welchbrothers.com">nmartinec@welchbrothers.com</a>	
<b>Additional Personnel Participating in Inspection:</b>					
Name:		Title:			
<b>Inspector(s):</b>					
Name(s):		Title:		Phone #:	
Andi Hodaj		Environmental Engineer		312-353-4645	
Matthew Schulte		Physical Scientist		312-886-2405	
<b>Inspection Report Author:</b>					
Name: Andi Hodaj		Signature/Date:		ANDI HODAJ <small>Digitally signed by ANDI HODAJ Date: 2022.05.13 05:53:35 -05'00'</small>	
<b>Supervisor Review:</b>					
Name: Molly Smith		Signature/Date:		MOLLY SMITH <small>Digitally signed by MOLLY SMITH Date: 2022.05.13 13:36:47 -05'00'</small>	

## 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: Andi Hodaj and Matthew Schulte, US EPA  
Brad Welch and Nick Martinec, Welch Bros., Inc.  
Andi Hodaj and Matthew Schulte (Collectively, EPA) introduced themselves and showed the inspector credentials to Mr. Welch and Mr. Martinec. EPA explained the purpose of the inspection and asked for some information on the operations taking place at the facility. EPA asked for permission to do a walkthrough of the outdoor area of the facility and take photographs.
  
- 2) Credentials presented to: Brad Welch and Nick Martinec
- 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:
  
- 5) 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:
  
- 6) 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).

Facility fabricates steel. It gets raw steel, bends it, cuts it and sends out to a third party galvanizer if needed or, sell it to customers.

Other industrial facilities owned/operated by same business entity? Yes No Describe:

Facility operates a retail store next to the steel fabrication facility. The retail store sells concrete and plastic septic tanks, PVC pipes, steel mesh, rolled mesh, metal pipes and corrugated pipes for culverts. Most are stored in outdoors uncovered areas and there is some stored in covered areas.

**SECTION II – OBSERVATIONS**

**SITE EVALUATION**

<b>Pollutant Sources</b>	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	None observed.
Industrial Manufacturing/ Processing Operations	None observed.
Industrial Machinery & Equipment Storage	None observed.

<p><b>Storage of Industrial Materials or Products</b></p>	<p>Steel is stored outdoors at the steel fabrication facility. The retail facility stored concrete and plastic septic tanks, PVC pipes, steel mesh, rolled mesh, metal pipes and corrugated pipes for culverts in its outdoor area.</p>
<p><b>Liquid Storage (e.g., Tanks, Liquid Storage Drums)</b></p>	<p>EPA observed two Duogard Citrus oil tanks under a covered area at the retail facility that had secondary containment.</p>
<p><b>Pollutant Sources</b></p>	<p>Note location (including whether occurring indoor or outdoor, and whether outdoor areas are paved or unpaved), quantity/size, design issues, any O&amp;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.</p>
<p><b>Waste Storage/Disposal Areas (solid and/or hazardous)</b></p>	<p>None observed.</p>
<p><b>Waste Treatment Facilities (e.g., Pretreatment Systems)</b></p>	<p>None observed.</p>
<p><b>Fueling Stations/Equipment Maintenance Areas &amp; Cleaning Areas</b></p>	<p>None observed.</p>
<p><b>Sediment &amp; Erosion Controls</b></p>	<p>None observed.</p>
<p><b>Spills/Leaks Handling</b></p>	<p>N/A</p>

<p>Outside Shelters</p>	<p><input type="checkbox"/> Temporary (Date Established _____) <input type="checkbox"/> Permanent</p> <p>N/A</p>
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**OUTFALL, STORMWATER DISCHARGE & RECEIVING WATER OBSERVATIONS**

<p>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).</p>	<p>There were two stormwater manholes at the steel fabrication facility that according to the company's representative, flow into the City of Elgin stormwater sewers.</p>
<p>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.</p>	<p>EPA observed pathways to the Poplar Creek from outdoor areas of the facility but there was no exposed material that pollute the stormwater except for some plastic bags and bottles at the outdoor retail store.</p>
<p>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.</p>	<p>None observed.</p>

**SECTION III – AREAS OF CONCERN**

CITATION	DESCRIPTION	SUPPORTING INFORMATION

**SECTION IV – CLOSING CONFERENCE**

**Attendees: Andi Hodaj, Matthew Schulte both of US EPA and Nick Martinec of Welch Bros., Inc.**

Was CBI collected?  Yes  No Describe:

Summary of areas of concern(s) listed above:

EPA observed some steel products on the banks of the Poplar Creek that could potentially fall into the Poplar Creek if the tree holding them broke or was uprooted during a highwater situation.

EPA observed some trash (plastic bags and bottles) along the property line and on the banks of the Poplar Creek, on the retail side of the facility.

Explanation of next steps: The final inspection report will typically be sent to the facility within 70 days. EPA has the option to offer expedited settlement agreements where facilities meet certain criteria.

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

*Attachment A – Aerial of facility*

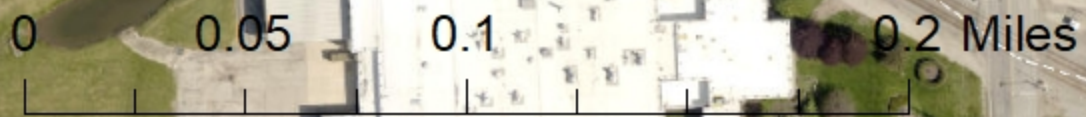
*Attachment B – Photograph Log*

# Aerial image of Welch Brothers Inc.



## Legend

- Welch\_Steel\_fabrication
- Welch\_retail
- Poplar\_Creek



Esri, HERE, Garmin, (c) OpenStreetMap contributors, and the GIS user community, Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community

**Welch Brothers, Inc.**  
**EPA Inspection 5/3/2022**  
**All photos taken by Andi Hodaj, Environmental Engineer, U.S. EPA**  
**Camera: RICOH WG-4**



1: RIMG2606

Description: Steel products stored on the concrete yard of Welch Brothers Inc.

Location: 333 Hammond Street, Elgin, IL

Camera Direction: East

Date/Time: 5/3/2022



2: RIMG2607

Description: Steel products stored on the concrete yard of Welch Brothers Inc.

Location: 333 Hammond Street, Elgin, IL

Camera Direction: East

Date/Time: 5/3/2022



3: RIMG2608

Description: Steel products stored close to the banks of Poplar Creek.

Location: 333 Hammond Street, Elgin, IL

Camera Direction: West

Date/Time: 5/3/2022



4: RIMG2609

Description: Steel products and wooden pallets stored on the yard of Welch Brothers Inc.

Location: 333 Hammond Street, Elgin, IL

Camera Direction: West

Date/Time: 5/3/2022



5: RIMG2610

Description: Indoor storage area with buckets filled steel material.

Location: 333 Hammond Street, Elgin, IL

Camera Direction: East

Date/Time: 5/3/2022



6: RIMG2611

Description: Steel products and wooden pallets stored on the yard on the banks of Poplar Creek.

Location: 333 Hammond Street, Elgin, IL

Camera Direction: East

Date/Time: 5/3/2022



7: RIMG2612

Description: Concrete and wooden material on the retail facility's yard.

Location: 333 Hammond Street, Elgin, IL

Camera Direction: North

Date/Time: 5/3/2022



8: RIMG2613

Description: Concrete and wooden material on the retail facility's yard.

Location: 333 Hammond Street, Elgin, IL

Camera Direction: North

Date/Time: 5/3/2022



9: RIMG2614

Description: Pile of steel product leaning against a tree on the south bank of Poplar Creek.

Location: 333 Hammond Street, Elgin, IL

Camera Direction: North

Date/Time: 5/3/2022



10: RIMG2615

Description: Gravel yard at the retail store and covered storage structure.

Location: 333 Hammond Street, Elgin, IL

Camera Direction: South

Date/Time: 5/3/2022



11: RIMG2616

Description: Tanks contains Duoguard Citrus oil used on concrete products.

Location: 333 Hammond Street, Elgin, IL

Camera Direction: South

Date/Time: 5/3/2022



12: RIMG2617

Description: PVC pipes and plastic bags at the retail store in an area surrounded by concrete blocks next to Poplar Creek.

Location: 333 Hammond Street, Elgin, IL

Camera Direction: Northeast

Date/Time: 5/3/2022



13: RIMG2618

Description: Steel products close to the banks of Poplar Creek at the retail store.

Location: 333 Hammond Street, Elgin, IL

Camera Direction: Northeast

Date/Time: 5/3/2022