



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

DATE: MAY 10 2019
SUBJECT: CLEAN AIR ACT INSPECTION REPORT
Wheatland Tube Company, Chicago, Illinois
FROM: Linda H. Rosen, Environmental Engineer
AECAB (IL/IN)
THRU: Nathan Frank, Section Chief
AECAB (IL/IN)
TO: File

BASIC INFORMATION

Facility Name: Wheatland Tube Company

Facility Location: 4435 South Western Boulevard, Chicago, Illinois

Date of Inspection: 11/27/2018

EPA Inspector(s):

1. Linda H. Rosen, Environmental Engineer, Environmental Engineer
2. Jason Schenandoah, Environmental Engineer

Other Attendees

1. Rob Werth, Environmental Manager, Wheatland Tube
2. Christine Walczak, Quality Manager, Wheatland Tube
3. Axel Avila, Coatings Support Specialist, Wheatland Tube
4. James K. Lee, Crest Industries
5. Jose Camargo, Crest Industries
6. Rick Sleckman, Crest Industries
7. Steve Anderson, Consultant, Admiral Environmental

Contact Email Address: Robert.Werth@zekelman.com

Purpose of Inspection: The purpose of the site visit was to observe Method 24 sampling on Wheatland Tube's coatings, as requested by EPA.

Facility Type: Wheatland Tube is a steel pipe and tube manufacturing facility.

Arrival Time: 8:05 a.m.

Departure Time: 9:30 a.m.

Inspection Type:

- ☐ Unannounced Inspection
- ☒ Announced Inspection

OPENING CONFERENCE

- ☒ Credentials Presented
- ☒ CBI warning to facility provided

The following information was obtained verbally from Wheatland Tube representatives unless otherwise noted.

Process Description:

Purchased steel, in coils, is cut to a specific width and the strips are welded end to end. The extended strip enters the accumulator where a high pH cleaner removes oils. The strip is rolled into a tube and welded at the seam. An Inner Diameter (ID) coating is applied, usually a slip coat. The tube enters a tube wash and hydrochloric acid is used to clean the oxides from the weld. The tube then goes through induction where it is heated to 2000 °F. Galvanizing is next where molten zinc is poured onto the tube then quenched to cool. The tube then undergoes sizing where it can be formed to any shape. A polymer pre-coat is then applied to the outside of the tube followed by an Outer Diameter (OD) coating applied by a vacuum coater. The tube is then exposed to heat to cure the coating. The inside of the tube is purged with N₂ to blow out any excess ID coating. The tubes are then cut to length and packaged. Some end spray occurs after packaging. The previously described process takes place in four mills. Control devices such as dust collectors, wet scrubbers, and acid scrubbers are used throughout the process in varying numbers.

Staff Interview: Prior to the date of the test observation, EPA had requested through email that Rob Werth identify the coatings to be sampled and tested. Mr. Werth indicated that ID-143B (reformulated version), ID-168, ID-150, OD-236 and OD-1735 would be sampled and analyzed. We asked why none of the colored coatings would be sampled and analyzed and Mr. Werth wrote in an electronic mail message that: "As of September 2017, colored water-based OD coatings are no longer in use at the facility."

TOUR INFORMATION

EPA toured the facility: Yes

Data Collected and Observations:

The facility sampled the following coatings: ID-143B, ID-168, ID-150, OD-236, and OD-1735. All the coatings except OD-1735 are manufactured by Crest Industries. Coating ID-143B has been reformulated since the time EPA's Finding of Violation was issued. OD-1735 is manufactured by the Thermoclad Company.

The ID-168 coating has zinc dust in it as applied. We observed the sample put into a tin can with a label and chain of custody form. When Steve Anderson from Admiral took the sample, there was no air space in the container but when Crest took its own sample, there was some air space. Two samples were taken of each coating, one for the facility and the other for the manufacturer.

Photos and/or Videos: were taken during the inspection.

Field Measurements: were not taken during this inspection.

RECORDS REVIEW

During the site visit, representatives from Crest Industries provided technical data sheets and safety data sheets for each of its four coatings. Mr. Werth provided a technical data sheet and a safety data sheet for the Thermoclad Company's OD-1735 coating.

CLOSING CONFERENCE

We thanked the facility for their cooperation during the site visit and said we looked forward to seeing the report within 30 days.

Report Author: _____

Date: _____

Section Chief: _____

Date: _____

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APPENDICES AND ATTACHMENTS

I. Media Appendix A

APPENDIX A: DIGITAL IMAGE LOG

1. Inspector Name: Jason Schenandoah	2. Date(s) of Inspection: 11/27/2018
3. Company/Facility Name: Wheatland Tube Company	4. Street Address, City, State: 4435 South Western Boulevard, Chicago, Illinois
5. Number of Images: 3	6. Archival Record Location: CD-R labeled "Wheatland Tube 11/27/2018, Chicago IL, Method 24 Sampling Photos"

Image Number	File Name	Date and Time (CST)	Description of Image
1	PB270001.JPG	11/27/2018 8:49 a.m.	Sampling of ID-168 in Mill 3
2	PB270002.JPG	11/27/2018 8:49 a.m.	Sampling of ID-168 in Mill 3
3	PB270003.JPG	11/27/2018 8:55 a.m.	Sampling of ID-143B in Mill 4