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

SUBJECT:	CLEAN WATER ACT INSPECTION REPORT Calumet Specialty Products Partners, L.P., Burnham, Illinois
FROM:	Jason Hewitt, Life Scientist Water Enforcement Branch, Section 1
THRU:	Molly Smith, Section Chief Water Enforcement Branch, Section 1
TO:	File

BASIC INFORMATION

Facility Name: Calumet Specialty Products Partners, L.P.

Facility Location: 14000 Mackinaw Avenue, Burnham, Illinois 60633

NPDES Permit Number: *N/A*

Facility Type: Petroleum Products Transfer Terminal

Date of Inspection: May 28,2021

EPA Inspector(s):

1. Jason Hewitt, Life Scientist
2. Bill Jones, Environmental Engineer

Other Attendees:

1. Henry Banach, Calumet Specialty Products Partners, L.P., Plant Manager
2. Mark W. Cheesman, Calumet Specialty Products Partners, L.P., SR. HSE Assessor
3. Angie Martin, Heritage Environmental Services, Vice President
4. Steve Lucero, Heritage Environmental Services, Project Manager

Contact Email Address: henry.banach@calumetspecialty.com; mark.chessman@clmt.com

Inspection Type: Industrial Stormwater

Facility Notification:

☐ Unannounced Inspection
☒ Announced Inspection

Regulations Relevant to Inspection: Industrial Stormwater Exposure – 40 C.F.R. §122.26 Stormwater Discharges, Clean Water Act section 301

Arrival Time: **9:00 AM**
Departure Time: **12:00 PM**

OPENING CONFERENCE

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

The following information was obtained verbally from Henry Banach, Mark Chessman, Angie Martin, and Steve Lucero unless otherwise noted.

Company Ownership: Calumet Specialty Products Partners LP, 2780 Waterfront Parkway East Dr. Ste 200, Indianapolis, Indiana 46214.

Process Description:

Calumet Refining, LLC is nationwide company primarily engaged in blending, compounding, and re-refining lubricating oils and greases from purchased mineral, animal, and vegetable materials. The parent company is Calumet Specialty Products L.P. The Burnham Terminal location, which was inspected, is a terminal and blending facility that accepts petroleum products via rail, stores them on site, and receives tanker trucks that accept, load, and transport the product off site. The Terminal takes 2 switches per week, with an average throughput of 80 rail cars monthly, and loads approximately 14 trucks per day, 5 days per week. The facility can do some product blending and has an in-house lab to test and certify. The Burnham facility SIC code is 5171 (Petroleum Bulk Stations and Terminals).

Staff Interview(s):

Staff Interviews began at approximately 9:30 am with Jason Hewitt representing EPA and the aforementioned other attendees representing Calumet Specialty Products L.P. Bill Jones arrived at approximately 9:30 am.

Plant Manager Henry Banach stated that the facility operates as a bulk station and terminal and there is no vehicle maintenance and washing at the facility, vehicles are sent offsite for services.

Consultant Angie Martin stated that the facility does not have an EPA Clean Water Act (CWA) permit but does have coverage under the Illinois Registration of Smaller Sources (ROSS) Program and has a Cook County Environmental Control Permit. Additionally, the facility has a local stormwater permit agreement with Metropolitan Water Reclamation District (MWRD). The state has never requested that the facility apply for any additional CWA coverage.

Henry Banach stated that all stormwater onsite is collected and tested and pretreated for oil and grease prior to discharge to the sewer system, and that the facility is built to hold a 20-year 24 hour storm plus the volume of the largest tank. He also indicated that there were emergency spill kits on site and the facility has an emergency spill standard operating procedure.

As per Henry Banach, Angie Martin, and Steve Lucero, there is 1000ft of skirted boom on site and a small John Boat which can be used to place the initial boom. Additionally, there is an emergency contractor (Heritage Environmental) which is on hand if needed, has Oil Spill Response Organization (OSRA) certification, and that all oil spill response equipment including backups are held on site. Henry Banach stated that there have been no major spills in the past and provided spill reports for the previous 3 years.

Henry Banach stated that there have been no issues with water level or river flooding into or out of the site. A berm covers both sides of the site and has been around for a long time. The berm periodically gets rebuilt and is maintained frequently. For the stormwater system, there is regular maintenance on the skimmer system (oil water separator) and the system has an alarm. The collection tank for the oil water separator is frequently pumped out and the remaining oil sold back to market.

Henry Banach indicated that the lab does generate some hazardous waste. Angie Martin stated that Heritage Environmental disposes of the hazardous waste offsite.

Facility Walk-Through Occurred: Yes

Data Collected and Observations:

The facility walkthrough focused on the site perimeter controls and internal stormwater sewer system. Stormwater on site gravity drains to a series of inlets which are all on an internal sewer. The internal sewer is gravity fed to a pump room and then pumped to an oil water separator, prior to being held, and then discharged to MWRD. MWRD samples at a manhole located directly to the east, off property, of the site (see image 23). The facility also has a surge wall which protects stormwater from going off site where rail cars unload (see image 1). Multiple inlets with standing water were observed, and it was noticeable that these inlets were well maintained but draining water slowly were the gravity elevation was higher (see images 2, 3, 6, 6, 8, 11, 15, 16, 17, 25, 28, 32). No trains were active on site, but trucks were present loading product near inlets (see image 4, 14). General maintenance on site was good as evidence by lack

of sheen at most inlets, although sheen was present at the most low lying area (see image 28), and site flow characteristics were acting as designed with no evidence of water leaving the site or pooling in areas without inlets. One area of the site (see image 16) upper elevation east side, may not have had the necessary elevation gradient to ensure stormwater from heavy rainfall would stay on site, but this was not verified. All industrial waste and storage containers not actively being used were enclosed in the Inside storage Building on the North end of the site (see image 13). The pump room appeared in good working order (see images 18, 19, 20), and there was no evidence of issues with the oil/water seperator (see image 21).

Focusing on the low-lying areas of the site. It was evident that the height of the berm was sufficient to contain stormwater on the site (see images 24, 27, and 31) and there was no evidence of any petroleum product above the berm in the vegetation (see image 29, 30, 33, 34) or in the Grand Calumet (see image 26, 35). Also in the low lying area, the facility has a dry hydrant (see image 29 and 30) which is a non-pressurized permanent pipe system installed to allow the withdrawal of water from the Grand Calumet River to provide a water source for fire suppression close to potential areas of concern.

Additionally, while the facility was inspected following a rain event, there was no evidence of stormwater coming into contact with the site and leaving the site without pretreatment.

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

Field Measurements: were not taken during this inspection.

RECORDS REVIEW

1. Spill Notification Forms From 2016 to Present
2. Oil Water Skimmer Water Sample Test Results from 3/16/2016 to 5/12/2021

CLOSING CONFERENCE

☒ Provided U.S. EPA point of contact to the facility
☐ Facility staff indicated that CBI was collected during the inspection.
☒ Facility staff indicated that CBI was not collected during the inspection

Requested documents:

- Facility Spill Prevention, Control, and Countermeasure Plan (SPCC Plan) [Received 5/28/2021]

Compliance Assistance:

It is recommended that the site conditions around the inlet identified in image 16 be checked to confirm they are to the correct gradient to keep water gravity flowing away from the property line of the site.

Areas of Concern:

None

SIGNATURES

Report Date is date of Section Chief signature.

X JASON HEWITT

Digitally signed by JASON HEWITT
Date: 2021.07.06 10:13:33 -05'00'

Report Author

X MOLLY SMITH

Digitally signed by MOLLY SMITH
Date: 2021.07.09 12:51:59 -05'00'

Section Chief

APPENDICES AND ATTACHMENTS

1. Attachment A – Photo Log
2. Attachment B – Approximate Photo Locations
3. Attachment C – Facility Drainage Diagram

Calumet Specialty Products Partners, L.P. Burnham, IL
EPA Inspection May 28, 2021
All photos taken by Jason Hewitt, Environmental Engineer, U.S. EPA
Camera: Pentax Optio WG-1 GPS

1: IMGP0001
Description: Surge Wall
Location: See 1 on Attachment B
Camera Direction: East
Date/Time: May 28, 2021

2: IMGP0002
Description: Catch Basin
Location: See 2-4 on Attachment B
Camera Direction: North
Date/Time: May 28, 2021

3: IMGP0003
Description: Catch Basin South of Four Tanks
Location: See 2-4 on Attachment B
Camera Direction: North
Date/Time: May 28, 2021

4: IMGP0004
Description: Hose and Bucket Below Tank Truck
Location: See 2-4 on Attachment B
Camera Direction: South
Date/Time: May 28, 2021

5: IMGP0005
Description: Catch Basin
Location: See 5-6 on Attachment B
Camera Direction: East
Date/Time: May 28, 2021

6: IMGP0006
Description: Catch Basin
Location: See 5-6 on Attachment B
Camera Direction: East
Date/Time: May 28, 2021

7: IMGP0007
Description: Product Transfer Pumps
Location: See 7-8 on Attachment B
Camera Direction: Northeast
Date/Time: May 28, 2021

8: IMGP0008
Description: Catch Basin Near Pump
Location: See 7-8 on Attachment B
Camera Direction: North
Date/Time: May 28, 2021

9: IMGP0009
Description: Drip Pan
Location: See 9-11 on Attachment B
Camera Direction: East
Date/Time: May 28, 2021

10: IMGP0010
Description: Tanks
Location: See 9-11 on Attachment B
Camera Direction: West
Date/Time: May 28, 2021

11: IMGP0011
Description: Catch Basin
Location: See 9-11 on Attachment B
Camera Direction: West
Date/Time: May 28, 2021

12: IMGP0012
Description: Plant Pump House
Location: See 12 on Attachment B
Camera Direction: South
Date/Time: May 28, 2021

13: IMGP0013
Description: Inside Storage Building North end of Site
Location: See 13 on Attachment B
Camera Direction: East
Date/Time: May 28, 2021

14: IMGP0014
Description: Truck over Trench Drain
Location: See 14-16 on Attachment B
Camera Direction: West
Date/Time: May 28, 2021

15: IMGP0015
Description: Catch Basin West of Truck
Location: See 14-16 on Attachment B
Camera Direction: West
Date/Time: May 28, 2021

16: IMGP0016
Description: Catch Basin and Tank
Location: See 14-16 on Attachment B
Camera Direction: East
Date/Time: May 28, 2021

17: IMGP0017
Description: Catch Basin
Location: See 17 on Attachment B
Camera Direction: West
Date/Time: May 28, 2021

18: IMGP0018
Description: Pump Room with Progressive Cavity Pump
Location: See 18-20 on Attachment B
Camera Direction:
Date/Time: May 28, 2021

19: IMGP0019
Description: Pump Room with Progressive Cavity Pump
Location: See 18-20 on Attachment B
Camera Direction:
Date/Time: May 28, 2021

20: IMGP0020
Description: Pump Room with Progressive Cavity Pump
Location: See 18-20 on Attachment B
Camera Direction:
Date/Time: May 28, 2021

21: IMGP0021
Description: Oil/Water Seperator, Flow to POTW
Location: See 21 on Attachment B
Camera Direction: South
Date/Time: May 28, 2021

22: IMGP0022
Description: Emergency Boom, Site Berm
Location: See 22 on Attachment B
Camera Direction: South
Date/Time: May 28, 2021

23: IMGP0023
Description: Offsite Manhole where Metropolitan Water Recclamaition Disctrict Samples
Location: See 23 on Attachment B
Camera Direction: North
Date/Time: May 28, 2021

24: IMGP0024
Description: Berm and Standing Water on Low End of Site
Location: See 24 on Attachment B
Camera Direction: South
Date/Time: May 28, 2021

25: IMGP0025
Description: Catch Basin
Location: See 25 on Attachment B
Camera Direction: West
Date/Time: May 28, 2021

26: IMGP0026
Description: Grand Calumet Directly Adjacent to Site
Location: See 26-28 on Attachment B
Camera Direction: Southwest
Date/Time: May 28, 2021

27: IMGP0027
Description: Low End of Site Berm
Location: See 26-28 on Attachment B
Camera Direction: South
Date/Time: May 28, 2021

28: IMGP0028
Description: Catch Basin with Oil Sheen
Location: See 26-28 on Attachment B
Camera Direction: South
Date/Time: May 28, 2021

29: IMGP0029
Description: Dry Hydrant on Berm
Location: See 29-35 on Attachment B
Camera Direction: Southwest
Date/Time: May 28, 2021

30: IMGP0030
Description: Dry Hydrant on Berm
Location: See 29-35 on Attachment B
Camera Direction: Southwest
Date/Time: May 28, 2021

31: IMGP0031
Description: Standing water by Berm on Road
Location: See 29-35 on Attachment B
Camera Direction: West
Date/Time: May 28, 2021

32: IMGP0032
Description: Catch Basin Inlet in Standing Water
Location: See 29-35 on Attachment B
Camera Direction: North
Date/Time: May 28, 2021

33: IMGP0033
Description: Dense Vegetation Along Top of Berm
Location: See 29-35 on Attachment B
Camera Direction: North
Date/Time: May 28, 2021

34: IMGP0034
Description: Top of Berm
Location: See 29-35 on Attachment B
Camera Direction: West
Date/Time: May 28, 2021

35: IMGP0035
Description: Grand Calumet Off Site Entry
Location: See 29-35 on Attachment B
Camera Direction: West
Date/Time: May 28, 2021

FIGURE 3 – SITE PLAN

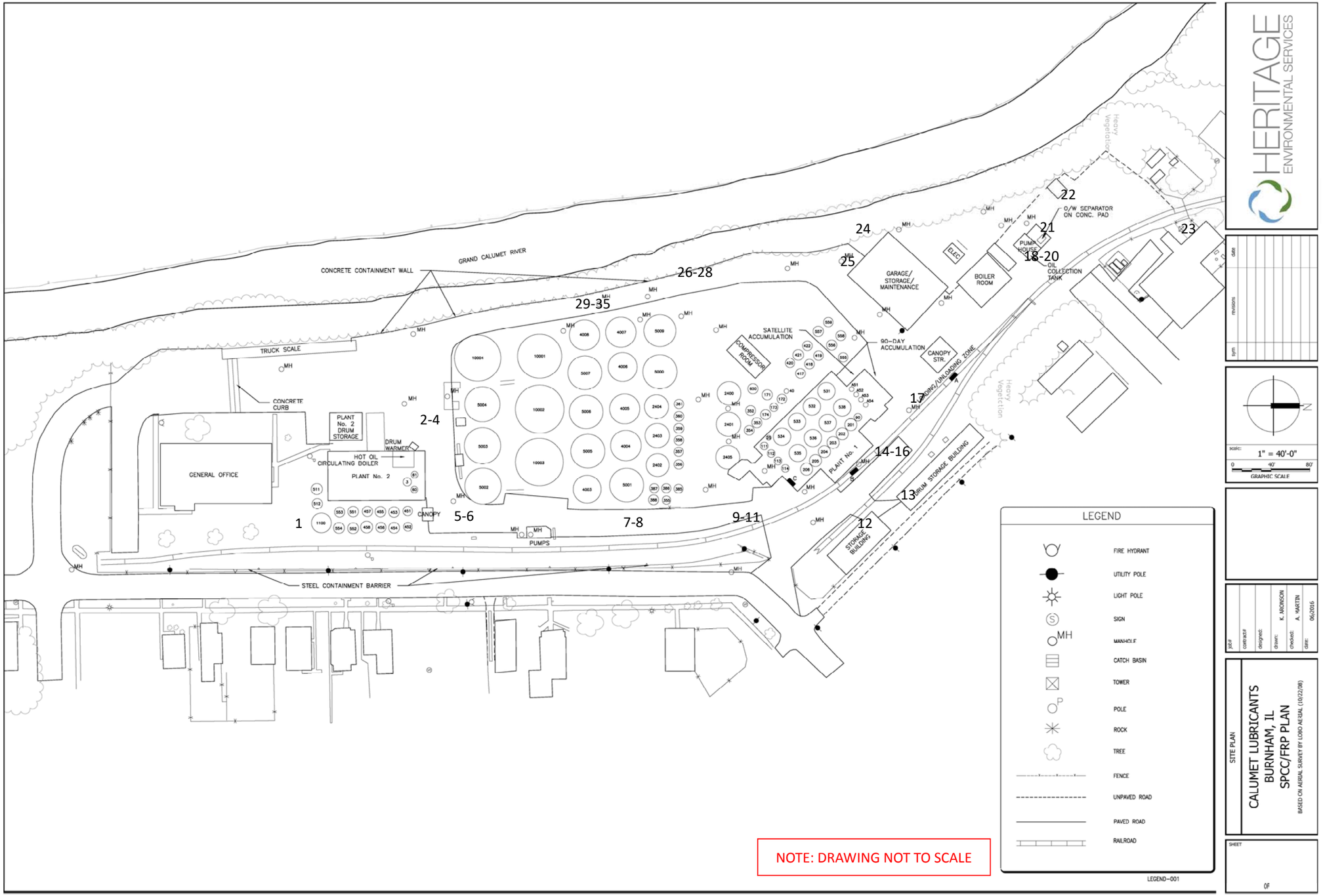

FIGURE 5 – FACILITY DRAINAGE DIAGRAM