

INSPECTION REPORT

Inspection Entry Date/Time	09/27/2023 10:00 AM (CT)	Announced: No	
Inspection Exit Date/Time	09/27/2023 02:30 PM (CT)	Access: Granted	
Weather	Cloudy with Intermittent Mist/Rain		
Media	Water		
Statute(s)/Program(s)	Clean Water Act, National Pollutant Discharge Elimination System (NPDES), Stormwater – Industrial		
Type of Inspection	Compliance Evaluation Inspection (CEI), Industrial Stormwater Inspection (ISI)		
Permittee Name	Indian Creek Development Company		
Facility or Site Name	Indian Creek Development Company (J.B. Industries, Inc.)		
Facility/Site Physical Address	601 North Farnsworth Avenue		
City, State, Zip Code	Aurora, Illinois 60505		
County/Borough/Parish	Kane		
Facility GPS Coordinates	41.76812, -88.27967		
FRS ID	110011264997		
Permit Number(s) (If Applicable)	ILR005954, IWDP-172		
SIC and/or NAICS	3494 / 333912		
Regulatory Representatives Participating in Inspection:			
Title	Name	Organization	
Environmental Engineer	Keith Middleton	EPA Region 5	
Lead Inspector:			
Eric Small	Small, Eric		Digitally signed by Small, Eric Date: 2023.11.14 08:39:20 -06'00'
	EPA Region 5	Small.Eric@epa.gov	(312) 886-6680
Supervisor Review:			
Ryan Bahr	RYAN BAHR		Digitally signed by RYAN BAHR Date: 2023.11.16 18:20:48 -06'00'
	EPA Region 5	bahr.ryan@epa.gov	

SECTION I – INTRODUCTION**Site Entry and Inspection Objectives**

On September 27, 2023, representatives from the United States Environmental Protection Agency, Region 5 (EPA team) conducted an unannounced Compliance Evaluation Inspection at J.B. Industries, Inc., a tenant property within Indian Creek Development Company, located at 601 North Farnsworth Avenue, Aurora, Illinois 60505 (hereinafter referred to as the Facility). The EPA team consisted of Eric Small and Keith Middleton, both of whom are credentialed NPDES inspectors for EPA. The purpose of this inspection is to assess and document the Facility's overall compliance with the Clean Water Act (CWA), any National Pollutant Discharge Elimination System Permit (NPDES Permit) it maintains, and all associated pretreatment regulations as an industrial user operating within the Fox Metro Water Reclamation District (FMWRD).

Concerning pretreatment regulation, EPA has developed nationally applicable pretreatment standards under CWA section 307(b) in its General Pretreatment Regulations for Existing and New Sources of Pollution at 40 CFR Part 403. There are two entities that maintain the responsibility to develop and implement the federal pretreatment program: an Approval Authority and a Control Authority. An Approval Authority is either the Director of a NPDES-authorized state with an EPA-approved pretreatment program or the Regional Administrator in a state without an approved pretreatment program. A Control Authority is either a Publicly Owned Treatment Works (POTW) with an approved pretreatment program or the Approval Authority for a POTW without an approved program. FMWRD currently manages an approved pretreatment program and is therefore the Control Authority for Indian Creek Development Company.

Prior to the inspection, FMWRD provided EPA with a copy of Industrial Wastewater Zero Discharge Permit IWDP-172, which was issued to the Indian Creek Development Company on July 16, 2023 and will expire on July 15, 2028. Moreover, since the State of Illinois does not have an approved pretreatment program, the EPA Regional Administrator is the Approval Authority for the Facility. As a result of this configuration, FMWRD has direct enforcement authority and EPA maintains oversight authority over Indian Creek Development Company's pretreatment practices.

This report is based on information supplied by representatives from J.B. Industries, Inc./Indian Creek Development Company, direct observations made by the EPA Region 5 inspectors, records and reports maintained by the permittee and other information including: photographs taken by EPA Region 5 inspectors, written statements made by Facility representatives during or subsequent to the on-site inspection, and materials, processes, data, photographs, or documents shown, demonstrated, or submitted to the EPA Region 5 inspectors by Facility representatives during or subsequent to the on-site inspection. In addition, information gathered prior to or subsequent to the inspection from a review of EPA, State, and/or public records may be included in this report.

Prior to entering the Facility, EPA was joined by three representatives of FMWRD: Michael Tucker (Environmental Compliance Coordinator), Nicolette Montes De Oca (Environmental Compliance Technician), and Andreas Ortiz (Environmental Compliance Technician). Upon entering the Facility at the southeastern security gate, EPA and FMWRD were greeted by a site representative who immediately contacted the Facility President, Mr. Ron Hill, by phone. EPA spoke with Mr. Hill about the purpose of the inspection and consented to waiting for the environmental consultant, Mr. Scott Gloss of American Safety & Environmental Consultants, Inc. (ASEC), to arrive on-site prior to beginning the inspection. As the EPA team was preparing for the opening conference, Mr. Dave Madden, Chief Technology Officer, escorted EPA and FMWRD into one of the Facility's conference rooms. Once Mr. Gloss arrived, an opening conference for the inspection commenced at 11:37 AM CT.

Attendees

Organization	Attendee Name	Title	Present in Opening Conf.	Present in Closing Conf.
EPA Region 5	Eric Small	Lead Inspector	Yes	Yes
EPA Region 5	Keith Middleton	Inspector	Yes	Yes
J.B. Industries	Dave Madden	Chief Technology Officer	Yes	No
American Safety & Environmental Consultants, Inc.	Scott Gloss	Consultant	Yes	Yes
Fox Metro Water Reclamation District	Michael Tucker	Environmental Compliance Coordinator	Yes	Yes
Fox Metro Water Reclamation District	Nicolette Montes De Oca	Environmental Compliance Technician	Yes	No
Fox Metro Water Reclamation District	Andreas Ortiz	Environmental Compliance Technician	Yes	No

Facility/Site Description

As the opening conference began, EPA personnel showed inspector credentials to Mr. Madden and Mr. Gloss. The EPA team stated their intentions to inspect Facility grounds for both pretreatment and stormwater purposes as well as perform a review of site documentation pertaining to the Clean Water Act. EPA inspectors also informed the J.B. Industries representatives of their rights to claim Confidential Business Information (CBI), though no such claim was made.

The first series of questions surrounded general business information and were directed to Mr. Madden. Information arising from this discussion indicated that J.B. Industries is predominantly a manufacturer of Heating, Ventilation, Air Conditioning, and Refrigeration (commonly known as HVACR) parts. They produce over 5,000 stock keeping units (SKU) and sell to wholesale distributors, with both domestic and international clientele. J.B. Industries began as an Aurora-based company in 1967 and moved to the Farnsworth Avenue location in 1981. Mr. Madden stated that the business has been growing at an inflationary pace and has introduced more machines as well as other innovative technologies over the years. Standard operating hours at the Facility are from 6:00 AM to 5:00 PM Monday through Friday. Overtime can occur especially in spring and summer months, as customer demand for products peaks during that time. Mr. Madden informed EPA inspectors that J.B. Industries employs approximately 100 people, split between its office space (approximately 20 workers) and plant (approximately 80 workers).

Information gathered from the inspection indicates that J.B. Industries is the largest tenant under the Indian Creek Development Company. While the property does maintain numerous other tenants, it was determined that this inspection would concentrate on the pretreatment activities of J.B. Industries and the property (i.e., Indian Creek Development Company) stormwater permit. Inspection information indicated that the property is considered to be composed of eight separate buildings, though this definition could vary due to buildings being interconnected.

Inspection Focus Areas

Location/Area/Sub-area
Interview at J.B. Industries Conference Room
Pretreatment Process and Reporting
Production Process
Sampling
Stormwater Discussion
Physical Inspection of the J.B. Industries Facility Production Areas
Assembly Department
Machine Shop
Pump Department
Shipping and Receiving Department
Physical Inspection of Indian Creek Development Company Facility Grounds

SECTION II – OBSERVATIONS

Location: Interview at J.B. Industries Conference Room/Production Process	
Observation #: ES3-OB-001	Date: 09/27/2023
Mr. Madden explained that while the Facility does not manufacture raw materials, these materials are machined and assembled using a variety of screw machines, horizontal and vertical CNC machines, brazing lines, and a variety of other custom automation. J.B. Industries' plant can be classified into four main sections: (1) Shipping and Receiving Department, (2) Assembly Department (3) Pump Department, and (4) Machine Shop Department. Mr. Madden also indicated that the burnishing area operated, in part, as its own department but for the purposes of this report will be incorporated primarily within the Assembly Department. Additionally, Mr. Madden confirmed that no plating is performed on-site. Waste streams noted during the opening conference included brass and metal scrap, used oil, and corrugated cardboard. Brass and metal (aluminum and steel) scrap is recovered during machining operations, dried using a mechanical spinner, and purchased by a scrap metal hauler. Inspection information indicates that oil is used in the Machine Shop Department within a closed system. Cutting lubricants and oils are used within the machining process, specifically within the CNC machines and vacuum pump, and are recirculated in these systems. Moreover, corrugated cardboard is collected and recycled by the Facility. Mr. Madden stated that all water utilized during these processes is potable water from the City of Aurora, though historically an on-site well may have been used. Outside of sanitary needs, Mr. Madden estimated that the vast majority of water at the Facility is evaporated through one of two evaporator units; one of which is relatively new. Mr. Madden stated that wastewater generated from brazing operations is primarily used as a cooling agent and is recirculated multiple times through brazing equipment prior to being placed into the evaporator tank. Wastewater and residual solids that cannot be evaporated are hauled off-site by a registered waste hauler. The EPA team proceeded to request waste manifests for the last twelve months. Throughout the discussion, Mr. Madden also noted that J.B. Industries uses bright dip, as a chemical solvent for burnishing products, and a parts washing solvent: both of which could be found in wastewater. During this exchange, the EPA team requested the Safety Data Sheets for each. Mr. Gloss emphasized that the Facility maintains a three-step approach to spill abatement: (1) Contain, (2) Collect, and (3) Dispose of. However, Mr. Madden added that no major spills have recently occurred.	

Once products are ready to be shipped out, they are sent to wholesale distribution centers throughout the United States as well as some international clientele. Over 5,000 Stock Keeping Units can be generated from operations at this Facility, with sales and production growing at an inflationary rate. Mr. Madden also provided a product estimate from the Pump Department that approximately 200 pumps are produced per day at the Facility. Since the company's inception, Mr. Madden indicated that new machines have been added and replaced over time, with the addition of more CNC machines and a new evaporator as the most recent capital expenditures for equipment. Mr. Gloss shared that the Facility has both a North America Industry Classification System (NAICS) code of 333912: Air and Gas Compressor Manufacturing and Standard Industrial Classification (SIC) code of 3494: Valves and Pipe Fittings, Not Elsewhere Classified.

Near the conclusion of this portion of the opening conference, the Facility's brazing line was discussed in further detail. Mr. Madden stated that the determination is made to transfer wastewater from the brazing line to the evaporator through a variety of factors, including water temperature, condition, and visual inspection. When this wastewater is placed into one of two interconnected holding tanks, it is batch-discharged to the older evaporator located adjacent to the brazing line. Mr. Madden informed the EPA team that the evaporator has a capacity of approximately 300 gallons and can evaporate 17-18 gallons per hour on average. The evaporator process eventually resulted in the generation of solid residuals, with Mr. Madden estimate approximately one-to-three 55-gallon drums are generated from this process per quarter. Near the end of this discussion, the EPA team requested a process diagram of the brazing line process to further understand wastewater management within this system.

Location: Interview at J.B. Industries Conference Room/Pretreatment Process and Reporting

Observation #: ES3-OB-002

Date: 09/27/2023

When asked about pretreatment processes, Mr. Madden stated that no pretreatment occurs on site due to a lack of industrial wastewater discharge to the sewer system. The EPA team also inquired about the number of connections to the sewer, given the age of buildings, their historical purpose, and number of buildings located within the Facility's boundaries. Mr. Gloss remarked that there may be multiple connections from the Facility to the sewer, though he would check to see if there was any documentation that could support this statement. Information prior to the tour of production areas indicated that any floor drains within the buildings would connect to the sewer and any outside crates or floor drains would funnel stormwater to Indian Creek. Reports certifying no discharge are submitted annually to FMWRD.

Location: Interview at J.B. Industries Conference Room/Sampling

Observation #: ES3-OB-003

Date: 09/27/2023

Mr. Madden and Mr. Gloss stated that no sampling occurs on-site due to a lack of a discharge. Moreover, Mr. Madden stated that no flow meters or pH meters are installed for wastewater within the Facility.

Location: Interview at J.B. Industries Conference Room/Stormwater Discussion

Observation #: ES3-OB-004

Date: 10/30/2023

During the inspection, Mr. Gloss shared that the Facility maintained one NPDES permit (ILR005954) issued by the State of Illinois as a General Storm Water NPDES Permit for Industrial Activity. When asked about whether the business has been subjected to flooding, Mr. Madden indicated that a serious flood had occurred in 1996 (with over 16" of rainfall recorded) where the banks of Indian Creek rose to levels that affected nearby equipment and buildings. Mr. Madden said that since the 1996 flood, there has been an effort to dredge areas

downstream of the Facility's location and that J.B. Industries has proactively kept items and equipment on racks in case a storm event of that magnitude reoccurs.

Inspection information indicates that Mr. Gloss performs stormwater oversight for the entire campus each month, and inspection logs are generated during each inspection that indicate any concerns related to the SWPPP or stormwater management at-large. After learning this information, the EPA team requested the last annual stormwater report, last 4 quarterly stormwater inspection reports, and the Facility's SWPPP. When inquiring about winter weather site management, Mr. Madden stated that snow removal for the site parking lots is performed by a contractor. Inspection information also noted that large amounts of packaged salt are stowed outside in preparation for shipment by one of the Facility tenants. After learning this information, the EPA team requested their most recent Notice of Intent, the last annual inspection, and a copy of their NPDES permit.

Location: Physical Inspection of the J.B. Industries Facility Production Areas/Assembly Department

Observation #: ES3-OB-005

Date: 09/27/2023

The EPA team began their tour of J.B. Industries' indoor operations by inspecting the Assembly Department, where a combination of custom automation, brazing lines, and hard packaging occurs. This portion of the inspection commenced at 12:40 P.M., and the EPA team was accompanied by Mr. Madden, Mr. Gloss, and Mr. Tucker. At this location, inspectors observed two types of brazing units: a circular brazing unit and a high temperature/gas flux brazing unit (see IMG_0139, IMG_0140, and IMG_0141). Mr. Madden said this area is mostly driven by hand assembly of parts, and water is used to cool parts before workers individually pick them up again. The technology employed machines brass parts, combining them with copper components to form brazed units. Mr. Madden added that brazing technology is used instead of soldering due to refrigeration pressure requirements. Inspection information indicates water within these units is recirculated until it becomes cloudy, where it is handled by forklift to be vacuumed out and directed into the nearby evaporator (see IMG_0144). Mr. Madden stated that the green hue observed in both the flame and recirculated water is related to the use of gas flux in the process.

The group proceeded to walk over to an adjacent room where both the evaporator and burnishing line operated. Mr. Madden explained that the burnishing area is a three-step process whereby brazed parts are (1) treated with a solvent called Bright Dip, (2) rinsed with water, and (3) polished using a component agitator. Images IMG_0142 and IMG_0143 in the report showcase this process. Mr. Madden said wastewater from the burnishing area is transported approximately ten feet from this setup into one of two interconnected 300-gallon holding tanks (see IMG_0145). Mr. Madden stated that these tanks only connect to the evaporator. Due to the potentially acidic nature of the wastewater, Mr. Madden asked for Mr. Avis Kelley, Maintenance Technician, to visit the group and explain how he tests the wastewater prior to placement into the tanks. Mr. Kelley stated that he ensures that the pH of the wastewater is between 7.6 and 7.8 before it is directed into the evaporating setup, using caustic soda as the principal adjustment chemical. Inspection information indicated that the residual product from the evaporator is pumped into 55-gallon drums to be hauled by a licensed waste transporter. Two 55-gallon drums were observed on individual pallets next to the evaporator (see IMG_0146). Mr. Kelley stated that approximately three-to-eight drums are picked up by licensed waste transporters quarterly. The EPA team proceeded to request manifests to reflect these shipments. The EPA inspection team did not observe any floor inlets in this area.

Photo(s)

1. [IMG_0142.JPG](#)
2. [IMG_0139.JPG](#)
3. [IMG_0140.JPG](#)
4. [IMG_0144.JPG](#)
5. [IMG_0143.JPG](#)
6. [IMG_0146.JPG](#)
7. [IMG_0141.JPG](#)
8. [IMG_0145.JPG](#)

Location: Physical Inspection of the J.B. Industries Facility Production Areas/Shipping and Receiving Department

Observation #: ES3-OB-006

Date: 09/27/2023

After visiting the Assembly Department, the inspectors -- accompanied by Mr. Madden, Mr. Gloss, and Mr. Tucker -- walked through the Shipping and Receiving Department. Mr. Madden also stated that repairs are performed in this area of the Facility. The EPA team did not observe any wastewater, stored chemicals, or floor inlets in this area. As a result, no photographs were taken in this area during the inspection.

Location: Physical Inspection of the J.B. Industries Production Areas/Machine Shop

Observation #: ES3-OB-007

Date: 09/27/2023

The penultimate department visited on the inspection was the Machine Shop Department. The EPA team observed a singular parts washer, which Mr. Madden stated is used to wash oil (cutting fluid) off of parts prior to burnishing (see IMG_0147). Moreover, the EPA team asked Mr. Angel Valenzuela, Machine Shop Lead, about the unit, and he estimated that approximately 1 drum per month is generated from this operation. Inspection information indicates that drummed wastewater from this parts washer is sent to the Facility's newer evaporator tied to operations within the Machine Shop Department.

An additional activity noted in the Machine Shop Department was another burnishing area, where aluminum parts are shined using a combination of mechanical energy and rinse water before being dried by a dryer. Mr. Madden stated that rinse wastewater from this area is also evaporated by the adjacent newer evaporator through two 300-gallon collection tanks (see IMG_0149). Inspection information also indicates that this wastewater is tested until it is between a pH of 7.6-7.8, using the caustic soda agent as needed for pH adjustment. Mr. Madden also explained that, prior to evaporation, a sand treatment is employed in this process (see IMG_0148).

Photo(s)

1. [IMG_0147.JPG](#)
2. [IMG_0148.JPG](#)
3. [IMG_0149.JPG](#)

Location: Physical Inspection of the J.B. Industries Facility Production Areas/Pump Department

Observation #: ES3-OB-008

Date: 09/27/2023

Mr. Madden and Mr. Gloss next led the EPA team and Mr. Tucker to the Pump Department, which had additional CNC machines operating to manufacture pump parts. Mr. Madden stated that prior to shipment, finished vacuum pumps are assembled and tested using a variety of pneumatic and hydraulic processes. The EPA

team noted two 300-gallon totes that Mr. Madden said comprise the vacuum pump oil recovery system (see IMG_0150). Inspection information indicates that these totes assist with recirculating used oil during pump assembly operations. No floor inlets or processes using water were observed in this portion of the inspection.

Photo(s)

1. [IMG_0150.JPG](#)

Location: Physical Inspection of Indian Creek Development Company Facility Grounds**Observation #:** ES3-OB-009**Date:** 09/27/2023

Following the inspection of J.B. Industries' production areas, the EPA team, Mr. Tucker, and Mr. Gloss walked around the outside of the premises to observe current stormwater practices. This portion of the inspection began at 1:15 PM. The group proceeded to walk over to the first area of interest: where Indian Creek flows underneath the Facility production building (see IMG_0151). The EPA team observed that the creek does not reemerge from this location until the western side of Farnsworth Avenue.

The group then walked the streambank to the east as the creek flows under a series of three bridges. Discharge pipes were observed intermittently throughout this area. Mr. Gloss stated that some pipes assist with stormwater drainage from Facility and tenants' roofs and grounds, while the others are disconnected from previous internal production operations (see IMG_0152, IMG_0153, and IMG_0155). The EPA team also observed numerous stacked pallets of packaged salt stored immediately to the south of the building where Accurate Color, a tenant company, operates. Plastic packaging from several of the salt containers was observed on the ground, with one piece of plastic partially obstructing a storm drain (see IMG_0154). Following this observation, the EPA team emphasized the importance of general housekeeping practices to prevent debris from entering a water body or becoming windblown.

The group proceeded to walk to the northeast of the salt storage area back to the creek, where an additional series of discharge pipes was observed to be placed on the banks of Indian Creek. One brown and one gray pipe on the southern side of the creek to the immediate east of the middle Facility bridge had observable discharge at the time of inspection (see IMG_0156). During the inspection, these two pipes were the only two observed pipes to have a discernable discharge into Indian Creek from the Facility. When asked about these two pipes discharging, Mr. Gloss stated that they were related to stormwater from the parking lot. During a post-inspection phone conversation with Mr. Gloss on November 31st, Mr. Gloss added that any time newer pipes are observed during a monthly SWPPP inspection, they are promptly investigated by ASEC personnel. He also noted that when these investigations have occurred in the past, new air compressors from tenants have been the observed cause. Mr. Gloss also added in an email sharing this information that he will continue to investigate this noted concern and provide any additional information pertaining to these pipes as soon as possible.

After this observation, the group moved to the north of the creek (see IMG_0158), where the EPA team noted a variety of tenant operators operating off of two primary access roads (see IMG_0160). During this portion of the inspection, Mr. Gloss stated that he speaks with these tenants if any witnessed practice is out of compliance with the SWPPP during monthly drive-by inspections. In recent memory, he recalled a "burn pit" located in a gravel pit on the northeastern side of the property. The EPA team did not observe this detail at the time of the inspection. Mr. Gloss said he had noted this in monthly SWPPP inspection prior to this inspection, but he was glad to see its removal since the September 5, 2023 SWPPP inspection.

A roofing company was among the tenants operating on the Facility grounds. Workers were observed to be unloading their trucks with construction and demolition debris material. Two debris piles noted from this practice were captured in IMG_0157. After following the creek upstream further to the east (see IMG_0159 and IMG_0161), the group elected to return to the main J.B. Industries conference room to conduct a closing conference.

Photo(s)

1. [IMG_0157.JPG](#)
2. [IMG_0153.JPG](#)
3. [IMG_0151.JPG](#)
4. [IMG_0155.JPG](#)
5. [IMG_0158.JPG](#)
6. [IMG_0154.JPG](#)
7. [IMG_0152.JPG](#)
8. [IMG_0156.JPG](#)
9. [IMG_0160.JPG](#)
10. [IMG_0159.JPG](#)
11. [IMG_0161.JPG](#)

SECTION III – RECORDS REVIEW

Records may not be in sequential order.

Record: Permit		AOC: Yes
Ref #: ES3-RR-020	Reviewed By: Eric Small	Reviewed Date: 11/03/2023
The current Illinois General NPDES Permit For Storm Water Discharges from Industrial Activity was reviewed by the inspector to determine the Facility's compliance with its permit. Attachment 1: Sector Specific Requirements For Industrial Activity was also used as a reference for this portion of the review. Based on information collected and inspection observations, the inspector noted the following: - No posted signage that designated the possession of the Facility's General NPDES Permit was visible at the time of the inspection. - It is unclear whether the two discharges observed during the inspection were related to industrial activity. Based on this information, it has yet to be determined if quarterly visual observation of discharges is required for this Facility.		
Document(s)		
1. ILR00 Industrial Renewed 7_1_2023 New General Permit.pdf 2. industrial-permit-attachment-1 (1).pdf		
Record: Communications		AOC: No
Ref #: ES3-RR-019	Reviewed By: Eric Small	Reviewed Date: 11/02/2023
In this email, Mr. Gloss provided all six Semi-Annual Zero Discharge Certification Statements for the last three years that were requested.		
Document(s)		
1. USEPA Clean Water Act Inspection Follow-Up - Document Request 11.02.2023.pdf		
Record: Other - Industrial Pretreatment Program Semi-Annual Zero Discharge Certification Statements		AOC: No
Ref #: ES3-RR-018	Reviewed By: Eric Small	Reviewed Date: 11/02/2023

As part of inspection follow-up, the EPA team requested Semi-Annual Zero Discharge Certification Statements for the last three years. Mr. Gloss subsequently sent over six pages of these semi-annual reports covering the reporting period from June 2020 - May 2023.

Document(s)

1. Fox Metro Certs ALL.pdf

Record: Personnel Training**AOC:** No**Ref #:** ES3-RR-017 **Reviewed By:** Eric Small**Reviewed Date:** 11/02/2023

The inspector reviewed an October 31, 2023 training sign in sheet with Mr. Gloss as the instructor. Approximately 20 attendants signed their name on the document.

Document(s)

1. SWPPP training.pdf

Record: Communications**AOC:** No**Ref #:** ES3-RR-016 **Reviewed By:** Eric Small**Reviewed Date:** 11/02/2023

The email transmittal contains additional documents and information requested as part of the CWA inspection. Information from this email was reviewed by the inspector and incorporated into the inspection report. In this email, Mr. Gloss also identified that any tenant's new discharge pipes will be addressed immediately.

Document(s)

1. USEPA Clean Water Act Inspection Follow-Up - Document Request 11.01.2023.pdf

Record: Notice of Intent**AOC:** Yes**Ref #:** ES3-RR-015 **Reviewed By:** Eric Small**Reviewed Date:** 11/02/2023

The inspector reviewed the Notice of Intent (NOI) for General Permit to Discharge Storm Water associated with Industrial Activity signed by Jeff McComb, Controller for J.B. Industries, on May 2, 2023. The facility name on the NOI is Indian Creek Development Company. Mr. Gloss added in the email with this attachment that J.B. Industries believes the NOI is still under review by the State of Illinois due to the absence of a reissuance letter. The 4-Digit SIC Code obtained during the inspection does not match what is noted on the NOI. Additionally, the coordinates provided on this document must reflect the current geographical location of the site. Moreover, since this submission, Illinois EPA has effectuated a new General NPDES Permit For Storm Water Discharges from Industrial Activities, which has been in effect since July 1, 2023. The inspector proceeded to contact Illinois EPA post-inspection regarding this matter, who said the Facility received notification of renewal on July 28, 2023 and that they would resend a renewal letter to the Facility. As a result, this compliance evaluation was performed relative to the 2023 General NPDES Permit.

Document(s)

1. NOI ILR005954.pdf

Record: SWPPP**AOC:** Yes**Ref #:** ES3-RR-014 **Reviewed By:** Eric Small**Reviewed Date:** 10/16/2023

The inspector obtained a copy of the SWPPP (with a revision date of May 2, 2023). The SWPPP indicated that the document is intended to cover the Indian Creek Development Company property and listed its eighteen tenants (and the type of industrial activity performed in each) as follows: J.B. Industries, Inc., Accurate Color (Plastic Company), Action Metals (Cut Flat Stock), Affordable Roofing (Roofing), Balco (Ball Valve Manufacturer), Guzman Auto (Auto Repair), SGT Roofing (Roofing), Outdoor Masters (Outdoor Renovation),

Andres Alcala (Kitchen Remodel), Danko (Precision Machining), ID Additives (Storage), FSA Awning & Tents (Storage), Palera Paving (Storage), Jr.'s Welding (Welding), Ting Automotive (Auto Renovation), Gusco Silicone Rubber (Rubber Molding), Power Diesel (Diesel Repair), and Midwest Pool (Pool Installation). After reviewing the 2023 General NPDES Permit produced by Illinois EPA, the EPA team noted the following general items on the SWPPP:

- The Facility's SIC code is not identified on the SWPPP and would be helpful to have listed.
- The topographical map is outdated and should be revised to reflect current site and surrounding conditions.
- Language stating that the SWPPP was designed for a 24-hour, 25-year storm event was not found.
- Due to the large amount and diversity of operating tenant facilities on-site, additional information may be necessary to explain the nature of industrial practices at each tenant business.
- The SWPPP states that "all of the facilities have floor drains that flow directly to the storm sewer," which is potentially inconsistent to information obtained during the inspection and also would require all operations within the Facility's interior to be described in the Plan.
- The "List Of Pollutants" found under Section 5.0 does not currently indicate or delineate tenant company chemicals.
- An email for the individual(s) responsible for developing, implementing, and revising the SWPPP was not apparent. If multiple individuals are responsible for the Plan's implementation, all of the applicable contact information should be added to the report.
- A certification that the discharge has been tested or evaluated for the presence of non-storm water discharge was not identified.
- Based on the SIC code provided, benchmark monitoring requirements are in effect for this Facility if it discharges; records for monitoring were requested as of this inspection but not identified.
- There is no signature by the preparer of the report on the document.
- The first two sentences (Section 2.1) of the SWPPP identify Indian Creek Development Company as both an "owner and operator" that "does not operate any manufacturing on site." The inclusion of both statements is mutually incompatible.
- Section 10.8 of the SWPPP identifies Facility representative Jeff McComb as the individual – and only designated member of the storm water pollution prevention personnel – who performs monthly visual inspections. Documentation provided does not indicate that Mr. McComb has performed these inspections within the time period reviewed. This item should reflect current practices.

The inspector also noted the following pertaining to the SWPPP Facility map:

- No clear outline of stormwater discharge paths nor direction of flow for Indian Creek was observed.
- Areas with solid waste dumpsters were not delineated.
- The inspectors observed loading areas throughout the site that could not be found.
- The direction of stormwater flow was not observed.
- The areas containing construction and demolition debris material and salt storage noted during the inspection was not identified on the map.
- Four floor drains within Tenant A depicted on the SWPPP were not observed during the inspection, nor does any documentation received describe their current status.

Document(s)

1. SWPPP 2023.pdf

Record: Other - Authorized Representative of Industrial User Notice

AOC: Yes

Ref #: ES3-RR-013

Reviewed By: Eric Small

Reviewed Date: 09/27/2023

The inspector obtained and reviewed this document prior to the inspection. The notification serves to recognize that Mr. Jeff McComb, Controller for J.B. Industries, is the individual responsible for correspondence with Fox Metro Water Reclamation District for the following submittals: annual inspections, reports, documentation, and wastewater discharge occurrences. This document is dated January 11, 2021. It is noted that the language in the second sentence of the document should be updated to reflect "facility name" and "facility business address."

Document(s)

1. Fox Metro Ordinance Acknowledgement.pdf

Record: Permit**AOC:** No**Ref #:** ES3-RR-012**Reviewed By:** Eric Small**Reviewed Date:** 09/27/2023

Prior to the inspection, FMWRD provided the inspector with a copy of the Facility's Industrial Wastewater Zero Discharge Permit IWDP - 172. This permit was issued on July 16, 2023 and will expire on July 15, 2028. Conditions of a Zero Discharge Permit are also contained in this document. This permit was reviewed by the inspector.

Document(s)

1. Fox Metro Water Reclamation District Industrial Wastewater Zero Discharge Permit.pdf

Record: Annual Reports**AOC:** Yes**Ref #:** ES3-RR-010**Reviewed By:** Eric Small**Reviewed Date:** 10/23/2023

The inspector reviewed the last Annual Facility Inspection Report for NPDES Individual Permit for Storm Water Discharges Associated with Industrial Site Activities submitted to the Illinois EPA's Compliance Assurance Section. The document references the reporting period from September 2022 to September 2023 and the NPDES Permit No. IL00005954, which is not the active site permit number. The inspector noted that the Facility is stated as being located in Cook County on the document, though J.B. Industries, Inc. is located in Kane County. Additionally, the inspector noted that this annual report is for NPDES individual permittees, though information from the inspection indicates that the Facility only maintains a general permit.

Document(s)

1. Annual Inspection Report 2023.pdf

Record: Other - Stormwater Monthly Inspection Summary Reports**AOC:** No**Ref #:** ES3-RR-009**Reviewed By:** Eric Small**Reviewed Date:** 10/23/2023

The inspector requested the last four quarterly stormwater reports submitted to Illinois EPA. From this request, the inspector received and reviewed the last six stormwater monthly inspection summary documents. Inspections were performed by David Genslinger and Scott Gloss of American Safety & Environmental Consultants, Inc. Items noted in the last six months during these inspections include a burn pit located in the gravel lot of Indian Creek Development Company, an open top to an intermediate bulk container in the northwestern portion of the field, and open dumpsters adjacent to one of the company's tenants, Outdoor Masters. In a subsequent email exchange between the inspection team and Mr. Gloss, he stated that the checklist observed on page 36 of the SWPPP is used as a guide for these quarterly reports.

Document(s)

1. Stormwater Monthly Inspections.pdf

Record: Communications**AOC:** No**Ref #:** ES3-RR-008**Reviewed By:** Eric Small**Reviewed Date:** 10/23/2023

The email transmittal contains documents and information requested as part of the CWA inspection. Information from this email was reviewed by the inspector and incorporated into the inspection report.

Document(s)

1. USEPA Clean Water Act Inspection Follow-Up - Document Request for J_B Industries, Inc..pdf

Record: Manifests**AOC:** No**Ref #:** ES3-RR-007**Reviewed By:** Eric Small**Reviewed Date:** 10/23/2023

The inspector requested the last 12 months of waste manifests during the inspection to understand the quantity and composition of waste emanating from the Facility. The inspector reviewed the seven manifests received, covering shipment dates from January 11, 2023 to September 21, 2023. Information from the manifests indicates that waste has been hauled by Enviro-Safe Transportation to either Enviro-Safe Resource Recovery, LLC. of Germantown, WI or Envirite of Illinois, Inc. of Harvey, IL. Additionally, waste shipped was intermittently tagged with one or more the following codes: IL14 (other organic liquid), D002 (corrosive waste), and D008 (lead).

Document(s)

1. Waste Manifest 12mo.pdf

Record: Process Description/Flow Diagram**AOC:** No**Ref #:** ES3-RR-006**Reviewed By:** Eric Small**Reviewed Date:** 10/23/2023

The inspector requested a process flow diagram of the Facility's brazing operation during the inspection and proceeded to review the submitted diagram. The process flow diagram summarizes how wastewater is recirculated through the brazing apparatus to cool parts until it deemed to be spent and pumped into a 300-gallon tank. Once pH is tested, this water is directed into an evaporating unit, and residual from this unit is removed and placed into 55-gallon drums to be hauled away from the Facility.

Document(s)

1. braze flow chart.pptx

Record: Other - Safety Data Sheet for Burnishing Department Solvent**AOC:** No**Ref #:** ES3-RR-005**Reviewed By:** Eric Small**Reviewed Date:** 10/23/2023

The SDS of Hydrite Bright Dip #380 -- used to enhance sheen and remove roughness during the burnishing process -- was reviewed by the inspector. The product is produced by Hydrite Chemical Company and is a mixture of phosphoric acid (<40%), sulfuric acid (<15%), nitric acid (<15%), and benzotriazole, sodium salt (<3%). Due to its composition, it maintains a pH below 1 and is an oxidizer. However, this product does not maintain a flash point. Aqueous waste from this chemical product could be considered characteristic hazardous waste due to its corrosivity (D002).

Document(s)

1. Bright Dip 380.pdf

Record: Other - Safety Data Sheet for Parts Washer Fluid**AOC:** No**Ref #:** ES3-RR-004**Reviewed By:** Eric Small**Reviewed Date:** 10/20/2023

The SDS of the product used for the on-site parts washer was reviewed by the inspector. The product, Evercycle ACI, is an industrial acid cleaner produced by Ransohoff – Cleaning Technologies Group. By weight, this mixture is composed of 75-85% deionized water, 10-30% ammonium citrate tribasic, and 1-5% ethoxylated propoxylated C8-C10 alcohols. The product also maintains a pH of 5.1, does not have an applicable flash point, and is not reactive.

Document(s)

1. Evercycle ACI GHS-SDS.pdf

Record: Other - Water Bills Issued by City of Aurora**AOC:** No**Ref #:** ES3-RR-003**Reviewed By:** Eric Small**Reviewed Date:** 10/20/2023

During the inspection, water bills were requested for the last three months. Due to the bimonthly nature of reports, J.B. Industries submitted invoices from April 27, 2023 to June 30, 2023 (544 hundred cubic feet used)

and from June 30, 2023 to August 27, 2023 (405 hundred cubic feet used). Both reports were reviewed by the inspector.

Document(s)

1. Water Bills 3mo.pdf

SECTION IV – SAMPLING ACTIVITIES AND ANALYTICAL RESULTS

No sampling was conducted.

SECTION V - AREA OF CONCERN

Area(s) of Concern (AOC) may not be in sequential order.

The presentation of Area(s) of Concern does not constitute a formal compliance determination or violation.

AOC Reference #: ES3-OB-005	Location: Physical Inspection of Indian Creek Development Company Facility Grounds
Regulation and/or Permit Requirement <u>Permit Part F.2.c.</u> Good Housekeeping and Pollution Prevention Practices - Good housekeeping requires the maintenance of clean, orderly facility areas that discharge storm water. Material handling areas shall be inspected and cleaned as necessary to reduce the potential for pollutants to enter the storm water conveyance system. The Permittee shall implement pollution prevention practices in areas that include, but are not limited to, trash containers, storage areas, loading docks, vehicle fueling, and maintenance. Exposed areas that may contribute pollutants to storm water shall be minimized to reduce or eliminate contaminated storm water runoff.	
AOC #1: Plastic packaging from several of the salt containers was observed on the ground, with one piece of plastic partially obstructing a storm drain (see IMG_0154).	
AOC #2: One brown and one gray pipe on the southern side of the creek to the immediate east of the middle Facility bridge had observable discharge at the time of inspection (see IMG_0156). During the inspection, these two pipes were the only two observed pipes to have a discernable discharge into Indian Creek from the Facility. When asked about these two pipes discharging, Mr. Gloss stated that they were related to stormwater from the parking lot. During a post-inspection phone conversation with Mr. Gloss on November 31st, Mr. Gloss added that any time newer pipes are observed during a monthly SWPPP inspection, they are promptly investigated by ASEC personnel. He also noted that when these investigations have occurred in the past, new air compressors from tenants have been the observed cause. Mr. Gloss also added in an email sharing this information that he will continue to investigate this noted concern and provide any additional information pertaining to these pipes as soon as possible.	

AOC Reference #: ES3-RR-010	Records Review: Annual Reports
Regulation and/or Permit Requirement <u>Permit Standard Condition 12(h)</u> Where the permittee becomes aware that it failed to submit any relevant facts in a permit application, or submitted incorrect information in a permit application, or in any report to the Agency, it shall promptly submit such fact or information.	
AOC #3:	

The document references the reporting period from September 2022 to September 2023 and the NPDES Permit No. IL00005954, which is not the active site permit number. The inspector noted that the Facility is stated as being located in Cook County on the document, though J.B. Industries, Inc. is located in Kane County.

Regulation and/or Permit Requirement

Permit Standard Condition 12(h) Where the permittee becomes aware that it failed to submit any relevant facts in a permit application, or submitted incorrect information in a permit application, or in any report to the Agency, it shall promptly submit such fact or information.

AOC #4:

The inspector noted that this annual report is for NPDES individual permittees, though information from the inspection indicates that the Facility only maintains a general permit.

AOC Reference #: ES3-RR-013

Records Review: Other - Authorized Representative of Industrial User Notice

Regulation and/or Permit Requirement

Permit Standard Condition 12(h) Where the permittee becomes aware that it failed to submit any relevant facts in a permit application, or submitted incorrect information in a permit application, or in any report to the Agency, it shall promptly submit such fact or information.

AOC #5:

The language in the second sentence of the document should be updated to reflect "facility name" and "facility business address."

AOC Reference #: ES3-RR-014

Records Review: SWPPP

Regulation and/or Permit Requirement

Permit Part E.1.a. The SWPPP shall be designed for a storm event equal to or greater than a 25-year 24-hour rainfall event unless federal regulations allow for a less restrictive rainfall event.

AOC #6:

Language stating that the SWPPP was designed for a 24-hour, 25-year storm event was not found.

Regulation and/or Permit Requirement

Permit Condition E.5.c.i. The Plan shall provide a description of potential sources which may be expected to add significant quantities of pollutants to storm water discharges, or which may result in non-storm water discharges from the facility. The Plan shall include, at a minimum, the following items...A narrative description of the following potential pollutant sources...The nature of the industrial activities conducted at the site and a list of the activities exposed to storm water.

AOC #7:

Due to the large amount and diversity of operating tenant facilities on-site, additional information is necessary to explain the nature of industrial practices at each tenant business.

Regulation and/or Permit Requirement

Permit Standard Condition 12(h) Where the permittee becomes aware that it failed to submit any relevant facts in a permit application, or submitted incorrect information in a permit application, or in any report to the Agency, it shall promptly submit such fact or information.

AOC #8:

The SWPPP states that "all of the facilities have floor drains that flow directly to the storm sewer," which is potentially inconsistent to information obtained during the inspection and also would require all operations within the Facility's interior to be described in the Plan.

Regulation and/or Permit Requirement

Permit Part E.5.c.ii. The Plan shall provide a description of potential sources which may be expected to add significant quantities of pollutants to storm water discharges, or which may result in non-storm water discharges from the facility. The Plan shall include, at a minimum, the following items...A narrative description of the following potential pollutant sources...A list of pollutant(s) or pollutant constituents associated with each identified activity above, which could be exposed to storm water or snowmelt and could be discharged from the facility. The Permittee must document all significant material that have been handled, treated, stored or disposed of, and that have been exposed to Storm Water in the three years prior to the date the Permittee prepares or amends its SWPPP. Materials, equipment, and vehicle management practices employed to minimize contact of significant materials-with storm water discharges (include on site map).

AOC #9:

The "List Of Pollutants" found under Section 5.0 does not currently indicate or delineate tenant company chemicals.

Regulation and/or Permit Requirement

Permit Part E.7. Storm Water Pollution Prevention Personnel; Identification by name, job titles, direct telephone numbers and email addresses (if available) of the individuals who are responsible for developing, implementing, and revising the Plan. All storm water pollution prevention personnel must have ready access to the most updated copy of the SWPPP and all associated documents and information as required by this permit.

AOC #10:

An email for the individual(s) responsible for developing, implementing, and revising the SWPPP was not apparent. If multiple individuals are responsible for the Plan's implementation, all of the applicable contact information should be added to the report.

Regulation and/or Permit Requirement

Permit Part E.8. Non-Storm Water Discharges; The Permittee shall include a certification that the discharge has been tested or evaluated for the presence of non-storm water discharges. The certification shall include a description of any tests for the presence of non-storm water discharges, the methods used, the dates of the testing, and any onsite drainage points or outfalls that were observed during the testing and action(s) taken to eliminate the discharge or documentation that a separate NPDES Permit was obtained. Except as provided in Part A.8 of this permit, discharges not comprised entirely of storm water are not authorized by this Permit or the permit shield provision in CWA Section 402(k) and must be covered by another NPDES Permit.

AOC #11:

A certification that the discharge has been tested or evaluated for the presence of non-storm water discharge was not identified.

Regulation and/or Permit Requirement

Permit Part J.2. Benchmark Monitoring. This permit specifies pollutant benchmark concentrations that are applicable to certain sectors/subsectors as specified in Attachment 1. Benchmark monitoring data are primarily for the Permittee's use to determine the overall effectiveness of specific control measures and to assist Permittees in knowing when additional corrective action(s) may be necessary to comply with the discharge limitations in Part F.

AOC #12:

Based on the SIC code provided, benchmark monitoring requirements are in effect for this Facility if it discharges; records for monitoring were requested as of this inspection but not provided by the Facility.

Regulation and/or Permit Requirement

Permit Part E.14. The Plan shall include the signature and title of the person responsible for preparation of the Plan and include the date of initial preparation and each amendment thereto.

AOC #13:

There is no signature by the preparer of the report on the document.

Regulation and/or Permit Requirement

Permit Standard Condition 12(h) Where the permittee becomes aware that it failed to submit any relevant facts in a permit application, or submitted incorrect information in a permit application, or in any report to the Agency, it shall promptly submit such fact or information.

AOC #14:

The first two sentences (Section 2.1) of the SWPPP identify Indian Creek Development Company as both an "owner and operator" that "does not operate any manufacturing on site." This information is unclear and should be clarified.

Regulation and/or Permit Requirement

Permit Part G.1. The Permittee shall conduct facility inspections covering all the areas subject to the requirements of this permit and identified in the SWPPP within 72 hours of the beginning of a storm event...Inspections must be performed by qualified personnel (as defined in Part M.12) with at least one member of the storm water pollution prevention personnel participating.

AOC #15:

Section 10.8 of the SWPPP identifies Facility representative Jeff McComb as the individual – and only designated member of the storm water pollution prevention personnel – who performs monthly visual inspections. Documentation provided does not indicate that Mr. McComb has performed these inspections within the time period reviewed.

Regulation and/or Permit Requirement

Permit Part E.5.b.ii The Plan shall provide a description of potential sources which may be expected to add significant quantities of pollutants to storm water discharges, or which may result in non-storm water discharges from the facility. The Plan shall include, at a minimum, the following items... A site map showing... An outline of the storm water drainage areas for each storm water discharge point, location, and identification of any MS4 to which the industrial site discharges storm water.

AOC #16:

No clear outline of stormwater discharge paths nor direction of flow for Indian Creek was observed.

Regulation and/or Permit Requirement

Permit Part E.5.b.iv The Plan shall provide a description of potential sources which may be expected to add significant quantities of pollutants to storm water discharges, or which may result in non-storm water discharges from the facility. The Plan shall include, at a minimum, the following items...A site map showing... Areas used for outdoor manufacturing, storage trash dumpsters and compactors or disposal of significant materials, including activities that generate significant quantities of dust or particulates.

AOC #17:

Areas with solid waste dumpsters were not delineated.

Regulation and/or Permit Requirement

Permit Part E.5.b.ix. The Plan shall provide a description of potential sources which may be expected to add significant quantities of pollutants to storm water discharges, or which may result in non-storm water discharges from the facility. The Plan shall include, at a minimum, the following items...A site map showing... Material loading, unloading, transfer, and access areas.

AOC #18:

The inspectors observed loading areas throughout the site that were not identified on the site map in the SWPPP.

Regulation and/or Permit Requirement

Permit Part E.5.b.x. The Plan shall provide a description of potential sources which may be expected to add significant quantities of pollutants to storm water discharges, or which may result in non-storm water discharges from the facility. The Plan shall include, at a minimum, the following items...A site map showing... Direction of storm water flow (use arrows).

AOC #19:

The direction of stormwater flow was not observed in the SWPPP.

Regulation and/or Permit Requirement

Permit Part E.5.b.xvii. The Plan shall provide a description of potential sources which may be expected to add significant quantities of pollutants to storm water discharges, or which may result in non-storm water discharges from the facility. The Plan shall include, at a minimum, the following items.....A site map showing...Location of any material storage areas (i.e., deicing material, fertilizers, soil stockpiles, etc.).

AOC #20:

The areas containing construction and demolition debris material and salt storage noted during the inspection was not identified on the site map in the SWPPP.

AOC # 21:

Four floor drains noted within Tenant A depicted on the SWPPP were not observed during the inspection, nor does any documentation received describe their current status.

AOC Reference #: ES3-RR-020**Records Review: Permit****Regulation and/or Permit Requirement**

Permit Part C.4. The permittee must post a sign of permit coverage (except in the instance where other laws or local ordinances prohibit such signage) at a safe, publicly accessible location in close proximity to the facility. This notice must include basic information about the facility (e.g., the NPDES ID number), information that informs the public on how to request the facility's Stormwater Pollution Prevention Plan (SWPPP), and how to contact the facility and IEPA if stormwater pollution is observed in the stormwater discharge.

AOC #22:

No posted signage that designated the possession of the Facility's General NPDES Permit was visible at the time of the inspection.

Regulation and/or Permit Requirement

Permit Part J.1. Quarterly Visual Observation of Discharges - The requirements and procedures for quarterly visual observations are applicable to all facilities covered under this permit, regardless of the Permittee's sector of industrial activity.

AOC #23:

It is unclear whether the two discharges observed during the inspection were related to industrial activity.

AOC Reference #: ES3-RR-015**Records Review: Notice of Intent****Regulation and/or Permit Requirement**

Permit Standard Condition 12(h) Where the permittee becomes aware that it failed to submit any relevant facts in a permit application, or submitted incorrect information in a permit application, or in any report to the Agency, it shall promptly submit such fact or information.

AOC #24:

The 4-Digit SIC Code obtained during the inspection does not match what is noted on the NOI.

Regulation and/or Permit Requirement

Permit Standard Condition 12(h) Where the permittee becomes aware that it failed to submit any relevant facts in a permit application, or submitted incorrect information in a permit application, or in any report to the Agency, it shall promptly submit such fact or information.

AOC #25:

The coordinates provided on this document must reflect the current geographical location of the site.

AOC Reference #: ES3-OB-002	Location/Area: Interview at J.B. Industries Conference Room/Pretreatment Process and Reporting
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AOC #26:
Information from the opening conference of the inspection indicated that that there may be multiple connections from the Facility to the sewer. However, no documentation has been provided to support or refute this statement.

SECTION VI – CLOSING CONFERENCE AND FOLLOW UP

Closing Conference

The EPA team held a closing conference with Facility personnel at 02:17 PM C.T. on 09/27/2023 for the inspection. During the closing conference, EPA Region 5 Lead Inspector discussed the preliminary observations and Area(s) of Concern identified during the inspection. Observations and Area(s) of Concern have not yet been evaluated for a formal compliance determination. The EPA team proceeded to exit the Facility at 2:30 PM.

Communication Log

The following information was received by EPA Region 5 on/after exiting the Facility on 09/27/2023.

Type	Point of Contact	Job Title/Organization	Description	Contains PII	Date
Phone	Michael Tucker	Environmental Compliance Coordinator/Fox Metro Water Reclamation District	On Tuesday, September 26th, I received a phone call from Michael Tucker, who was returning a voicemail I had left earlier in the day. Mr. Tucker and I discussed EPA's intention to conduct an unannounced Clean Water Act inspection of the Indian Creek Development Company property the following day (9/27). Mr. Tucker expressed interest for members of the Fox Metro Water Reclamation District to accompany EPA onto the property.	No	09/26/2023 09:34 AM (CT)
Email	Scott Gloss	Consultant/American Safety & Environmental Consultants	On Tuesday, October 10th, I received an email from Mr. Gloss that contained follow-up information related to the inspection. The email contained the following nine attachments: an industrial stormwater permit, the current SWPPP, the 2023 annual inspection report, the last six monthly stormwater inspections, water bill invoices for the last three months, waste manifests for the last year, a process flow diagram of the brazing line, an SDS for the parts washer, and an SDS for a burnishing additive. Follow-up information was also embedded within the text of the email.	No	10/10/2023 04:00 PM (CT)
Email	Scott Gloss	Consultant/American Safety & Environmental Consultants	In an acknowledgement to a document request and inspection follow-up email, Mr. Gloss replied on Tuesday, October 3rd and asked for clarity concerning how many months of manifests have been requested.	No	10/03/2023 04:50 PM (CT)

Email	Scott Gloss	Consultant/American Safety & Environmental Consultants	On Thursday, October 26th, I received confirmation from Mr. Gloss that he would look into obtaining additional documentation requested.	No	10/26/2023 11:29 AM (CT)
Phone	Scott Gloss	Consultant/American Safety & Environmental Consultants	On Tuesday, October 31st, I received a phone call from Mr. Gloss seeking clarity on requested information from a Wednesday, October 25th CWA follow-up email. Mr. Gloss specifically asked for clarification on inquiries relating to the Facility's industrial stormwater permit, monthly visual inspections, and records related to discharge. I provided Mr. Gloss some additional context surrounding my questions, and he stated that he will provide prompt follow-up. Items specifically discussed in this phone call will be reflected upon in the appropriate sections of this report.	No	10/31/2023 02:38 PM (CT)
Email	Scott Gloss	Consultant/American Safety & Environmental Consultants	On Wednesday, November 1st, I received an email from Mr. Gloss regarding a series of follow-up information pertaining to the CWA inspection. The email comprised four attachments: SWPPP training documentation, two attachments containing certification statements of zero discharge to FMWRD, and the most recent Notice of Intent for General Permit to Discharge Storm Water associated with Industrial Activity submitted to Illinois EPA. Information noted from the October 31st phone call was also reiterated in this email.	No	11/01/2023 04:48 PM (CT)
Phone	Scott Gloss	Consultant/American Safety & Environmental Consultants	On Thursday, November 2nd, Mr. Gloss called to ensure I had received the documents from the November 1st email. He also emphasized that he is continuing to work toward collating documents related to	No	11/02/2023 11:42 AM (CT)

			the follow-up email and will provide me with them as soon as possible.		
Email	Scott Gloss	Consultant/American Safety & Environmental Consultants	On Thursday, November 2nd, I received an attachment from Mr. Gloss that included Semi-Annual Zero Discharge Certification Statements for the three-year time period requested.	No	11/02/2023 03:14 PM (CT)

SECTION VII – LIST OF APPENDICES

1. Photo Log
2. Document Log

APPENDIX 1: PHOTO LOG



IMG_0139			IMG_0139.JPG
09/27/2023 12:44 PM	No CBI	No PII	Photographer: Keith Middleton
Physical Inspection of the J.B. Industries Facility Production Areas/Assembly Department			Location: J.B. Industries – Production Area
Description: Circular Brazing Unit			



IMG_0140			IMG_0140.JPG
09/27/2023 12:46 PM	No CBI	No PII	Photographer: Keith Middleton
Physical Inspection of the J.B. Industries Facility Production Areas/Assembly Department			Location: J.B. Industries – Production Area
Description: Circular Brazing Unit (2)			



IMG_0141			IMG_0141.JPG
09/27/2023 12:47 PM	No CBI	No PII	Photographer: Keith Middleton
Physical Inspection of the J.B. Industries Facility Production Areas/Assembly Department			Location: J.B. Industries – Production Area
Description: High Temperature/Gas Flux Brazing Unit			



IMG_0142			IMG_0142.JPG
09/27/2023 12:49 PM	No CBI	No PII	Photographer: Keith Middleton
Physical Inspection of the J.B. Industries Facility Production Areas/Assembly Department			Location: J.B. Industries – Production Area
Description: Bright Dip Acid Rinse			



IMG_0143			IMG_0143.JPG
09/27/2023 12:51 PM	No CBI	No PII	Photographer: Keith Middleton
Physical Inspection of the J.B. Industries Facility Production Areas/Assembly Department			Location: J.B. Industries – Production Area
Description: Component Agitator			



IMG_0144			IMG_0144.JPG
09/27/2023 12:51 PM	No CBI	No PII	Photographer: Keith Middleton
Physical Inspection of the J.B. Industries Facility Production Areas/Assembly Department			Location: J.B. Industries – Production Area
Description: Wastewater Evaporator (top, middle/right)			



IMG_0145			IMG_0145.JPG
09/27/2023 12:54 PM	No CBI	No PII	Photographer: Keith Middleton
Physical Inspection of the J.B. Industries Facility Production Areas/Assembly Department			Location: J.B. Industries – Production Area
Description: Wastewater Storage Location (both storage tanks shown)			



IMG_0146			IMG_0146.JPG
09/27/2023 12:55 PM	No CBI	No PII	Photographer: Keith Middleton
Physical Inspection of the J.B. Industries Facility Production Areas/Assembly Department			Location: J.B. Industries – Production Area
Description: Off-Specification Wastewater Storage Area			



IMG_0147			IMG_0147.JPG
09/27/2023 12:59 PM	No CBI	No PII	Photographer: Keith Middleton
Physical Inspection of the J.B. Industries Facility Production Areas/Machine Shop			Location: J.B. Industries – Production Area
Description: Finished Parts Washer			



IMG_0148			IMG_0148.JPG
09/27/2023 01:04 PM	No CBI	No PII	Photographer: Keith Middleton
Physical Inspection of the J.B. Industries Facility Production Areas/Machine Shop			Location: J.B. Industries – Production Area
Description: Wastewater Sand Treatment System, Prior to New Wastewater Evaporator			



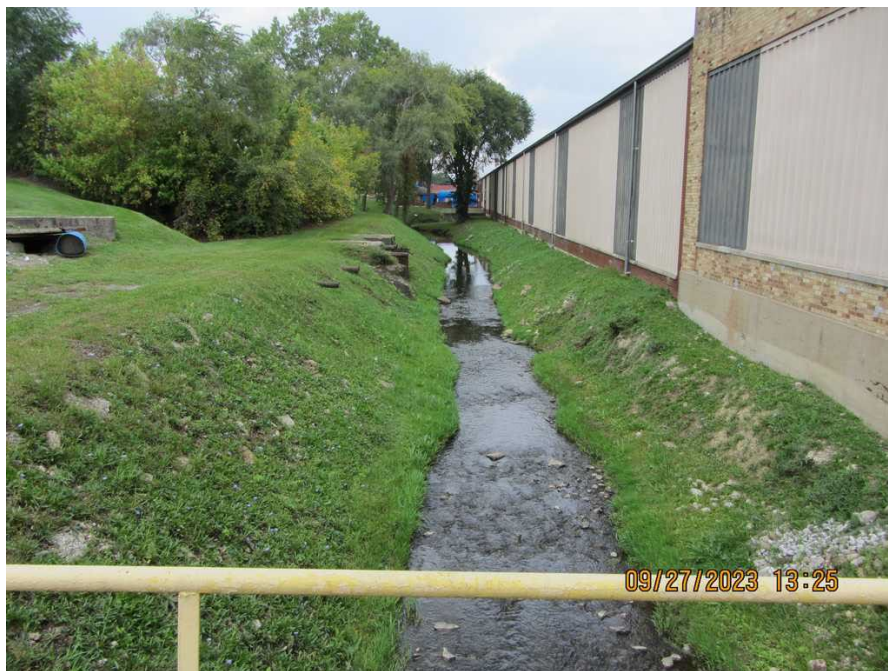
IMG_0149			IMG_0149.JPG
09/27/2023 01:05 PM	No CBI	No PII	Photographer: Keith Middleton
Physical Inspection of the J.B. Industries Facility Production Areas/Machine Shop			Location: J.B. Industries – Production Area
Description: New Wastewater Evaporator (top/middle of photograph)			



IMG_0150			IMG_0150.JPG
09/27/2023 01:10 PM	No CBI	No PII	Photographer: Keith Middleton
Physical Inspection of the J.B. Industries Facility Production Areas/Pump Department			Location: J.B. Industries – Production Area
Description: Vacuum Pump Oil Recovery System			



IMG_0151			IMG_0151.JPG
09/27/2023 01:18 PM	No CBI	No PII	Photographer: Keith Middleton
Physical Inspection of Indian Creek Development Company Facility Grounds			Location: J.B. Industries/Indian Creek Industrial Park – Facility Grounds
Description: Indian Creek; Flowing Under the J.B. Industrial Production Building; Camera Direction: Northwest			



IMG_0152			IMG_0152.JPG
09/27/2023 01:25 PM	No CBI	No PII	Photographer: Keith Middleton
Physical Inspection of Indian Creek Development Company Facility Grounds			Location: J.B. Industries/Indian Creek Industrial Park – Facility Grounds
Description: Indian Creek; Looking Downstream Towards J.B. Industries Production Building; Camera Direction: West			



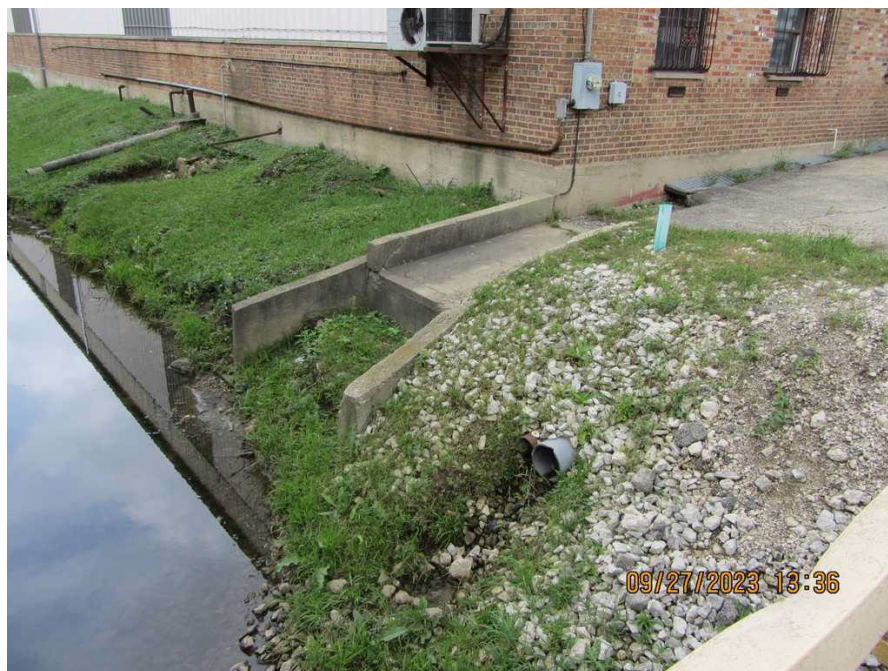
IMG_0157			IMG_0153.JPG
09/27/2023 01:25 PM	No CBI	No PII	Photographer: Keith Middleton
Physical Inspection of Indian Creek Development Company Facility Grounds			Location: J.B. Industries/Indian Creek Industrial Park – Facility Grounds
Description: Indian Creek; Looking Upstream Through Indian Creek Industrial Park; Camera Direction: East			



IMG_0154			IMG_0154.JPG
09/27/2023 01:30 PM	No CBI	No PII	Photographer: Keith Middleton
Physical Inspection of Indian Creek Development Company Facility Grounds			Location: J.B. Industries/Indian Creek Industrial Park – Facility Grounds
Description: Stormwater Inlet and Dumpsters; Near Salt Storage South of Building Complex; Camera Direction: North			



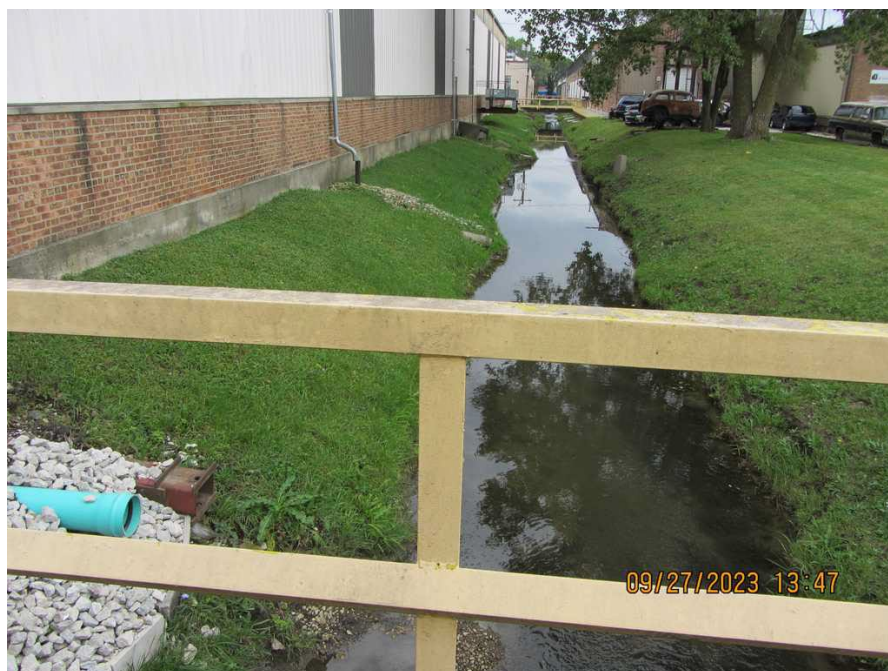
IMG_0155			IMG_0155.JPG
09/27/2023 01:34 PM	No CBI	No PII	Photographer: Keith Middleton
Physical Inspection of Indian Creek Development Company Facility Grounds			Location: J.B. Industries/Indian Creek Industrial Park – Facility Grounds
Description: Indian Creek; Looking Upstream Towards Indian Creek Industrial Park (further upstream than Photograph 17); Camera Direction: East			



IMG_0156			IMG_0156.JPG
09/27/2023 01:36 PM	No CBI	No PII	Photographer: Keith Middleton
Physical Inspection of Indian Creek Development Company Facility Grounds			Location: J.B. Industries/Indian Creek Industrial Park – Facility Grounds
Description: Rooftop Drainage to Indian Creek from Building East of J.B. Industries Production Area, with two pipes discharging near center of photograph; Camera Direction: Southeast			



IMG_0157			IMG_0157.JPG
09/27/2023 01:43 PM	No CBI	No PII	Photographer: Keith Middleton
Physical Inspection of Indian Creek Development Company Facility Grounds			Location: J.B. Industries/Indian Creek Industrial Park – Facility Grounds
Description: Outdoor Storage Area, East of Indian Creek Industrial Park Buildings; Camera Direction: East			



IMG_0158			IMG_0158.JPG
09/27/2023 01:47 PM	No CBI	No PII	Photographer: Keith Middleton
Physical Inspection of Indian Creek Development Company Facility Grounds			Location: J.B. Industries/Indian Creek Industrial Park – Facility Grounds
Description: Indian Creek; Looking Downstream Through Indian Creek Industrial Park; Camera Direction: West			



IMG_0159			IMG_0159.JPG
09/27/2023 01:48 PM	No CBI	No PII	Photographer: Keith Middleton
Physical Inspection of Indian Creek Development Company Facility Grounds			Location: J.B. Industries/Indian Creek Industrial Park – Facility Grounds
Description: Indian Creek; Looking Upstream to Indian Creek Industrial Park East Property Line; Camera Direction: East			



IMG_0160			IMG_0160.JPG
09/27/2023 01:52 PM	No CBI	No PII	Photographer: Keith Middleton
Physical Inspection of Indian Creek Development Company Facility Grounds			Location: J.B. Industries/Indian Creek Industrial Park – Facility Grounds
Description: Access Road Within Indian Creek Industrial Park; Camera Direction: North			



IMG_0161			IMG_0161.JPG
09/27/2023 02:05 PM	No CBI	No PII	Photographer: Keith Middleton
Physical Inspection of Indian Creek Development Company Facility Grounds			Location: J.B. Industries/Indian Creek Industrial Park – Facility Grounds
Description: Indian Creek; Looking Upstream to Indian Creek Industrial Park East Property Line; Camera Direction: East			

APPENDIX 2: DOCUMENT LOG

Document Type	Document Name	Contains CBI	Contains PII	Uploaded By	Date Received
Communications	USEPA Clean Water Act Inspection Follow-Up - Document Request 10.03.2023.pdf	No	No	Eric Small	10/16/2023
Other - Water Bills Issued by City of Aurora	Water Bills 3mo.pdf	No	No	Eric Small	10/20/2023
Other - Safety Data Sheet for Parts Washer Fluid	Evercycle ACI GHS-SDS.pdf	No	No	Eric Small	10/20/2023
Other - Safety Data Sheet for Burnishing Department Solvent	Bright Dip 380.pdf	No	No	Eric Small	10/23/2023
Process Description/Flow Diagram	brazo flow chart.pptx	No	No	Eric Small	10/23/2023
Other - Stormwater Monthly Inspection Summary Reports	Stormwater Monthly Inspections.pdf	No	No	Eric Small	10/23/2023
Annual Reports	Annual Inspection Report 2023.pdf	No	No	Eric Small	10/23/2023
Communications	USEPA Clean Water Act Inspection Follow-Up - Document Request for J_B Industries, Inc..pdf	No	No	Eric Small	10/23/2023
Manifests	Waste Manifest 12mo.pdf	No	No	Eric Small	10/23/2023
Permit	Fox Metro Water Reclamation District Industrial Wastewater Zero Discharge Permit.pdf	No	No	Eric Small	10/23/2023
Other - Authorized Representative of Industrial User Notice	Fox Metro Ordinance Acknowledgement.pdf	No	No	Eric Small	10/23/2023
SWPPP	SWPPP 2023.pdf	No	No	Eric Small	10/23/2023
Communications	USEPA Clean Water Act Inspection Follow-Up - 10.26.2023.pdf	No	No	Eric Small	10/30/2023
Notice of Intent	NOI ILR005954.pdf	No	No	Eric Small	11/02/2023
Communications	USEPA Clean Water Act Inspection Follow-Up - Document Request 11.01.2023.pdf	No	No	Eric Small	11/02/2023

Indian Creek Tenants

Inspection Date(s):

09/27/2023 - 09/27/2023

Personnel Training	SWPPP training.pdf	No	No	Eric Small	11/02/2023
Other - Industrial Pretreatment Program Semi-Annual Zero Discharge Certification Statements	Fox Metro Certs ALL.pdf	No	No	Eric Small	11/02/2023
Communications	USEPA Clean Water Act Inspection Follow-Up - Document Request 11.02.2023.pdf	No	No	Eric Small	11/02/2023
Permit	ILR00 Industrial Renewed 7_1_2023 New General Permit.pdf	No	No	Eric Small	11/03/2023
Permit	industrial-permit-attachment-1 (1).pdf	No	No	Eric Small	11/03/2023