



REGION 5

CHICAGO, IL 60604

MEMORANDUM

SUBJECT: CLEAN AIR ACT INSPECTION REPORT
Befesa Zinc US Inc., Chicago, Illinois

FROM: Victoria Nelson, Environmental Engineer
AECAB (MI/WI)

THRU: Sarah Marshall, Section Supervisor
AECAB (MI/WI)

TO: File

BASIC INFORMATION

Facility Name: Befesa Zinc US Inc. (Befesa)

Facility Location: 2701 East 114th Street, Chicago, Illinois

Date of Inspection: October 2, 2024

EPA Inspectors:

1. Victoria Nelson, Environmental Engineer
2. Alexandra Letuchy, Environmental Engineer

Other Attendees:

1. Ivan Znika, Assistant Plant Manager
2. Jeffrey Davids, Environmental Specialist
3. Eric Hunsberger, Director – Environmental Affairs (on phone)
4. Don Norton, Director of Operations West (on phone)
5. Jim Taylor, Environmental Affairs Manager West (on phone)

Contact Email Address: Ivan Znika - ivan.znika@befesa.com

Purpose of Inspection: To evaluate compliance with the Clean Air Act and the April 29, 2020 Consent Decree

Facility Type: Secondary zinc refiner

Facility Name: Befesa Zinc US Inc. (Befesa)
Facility Location: 2701 East 114th Street, Chicago, Illinois
Date of Inspection: October 2, 2024

Regulations Central to Inspection: The Illinois State Implementation Plan and the Facility's Title V and Construction Permits

Arrival Time: 10:30 AM

Departure Time: 5:30 PM

Inspection Type:

- ☒ Unannounced Inspection
- ☐ Announced Inspection

OPENING CONFERENCE

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

The following information was obtained verbally from Ivan Znika and Jeffrey Davids unless otherwise noted.

Company Ownership: Befesa acquired the facility from American Zinc Recycling in 2022.

Process Description:

Befesa receives dust from off-site electric arc furnaces (EAF) to its Conditioning and Blending (C&B) Building. The C&B Building has three baghouses, BC-11A, 11B, and 12 for dust control, which put the building under negative pressure. Incoming material is blended to form a homogenous composition. Material processed in the C&B building is next conveyed to the Feed Building, where coke can be added. Baghouse BC-E controls emissions associated with the conveyor (EB-5) that brings material from the C&B Building to the feed building, a transfer point in the rail unloading area, and the transfer of carbon material onto the EB-5 conveyor. The Feed Building consists of numerous conveyors and two pelletizers. The pelletizers use water and mix the dust to form pellets from a portion of the EAF material. Baghouses BC-A1, A2, B, and C control emissions at the Feed Building. Material from the Feed Building is routed to Kilns #1 and #2. BC-2 controls dust at the exchange point of two conveyors at the feed tower in between the Feed Building and the kilns. The two kilns operate under a countercurrent draft. Iron rich material (IRM) leaves one end of the kiln to be cooled and shipped offsite as product. Baghouse BC-D controls dust generated at the IRM discharge area. BC-D controls dust from the transfer of IRM to storage piles. Zinc gas leaves the molten material through the opposite end of the kilns. The zinc gas is cooled in a collecting chamber to form zinc oxide and is collected in two baghouses, referred to as product collectors PC-3 and PC-10.

Water collected from on-site stormwater basins is used to spray down molten material exiting the kilns. This water is also used in the pelletizers and is sometime used in the water truck for watering the roads.

The facility is required to continuously monitor pressure drop and fan amperage at each baghouse and to conduct indraft flow measurements at the C&B Building. Annually, Befesa is also required to measure the flow rates to the baghouses.

Staff Interview:

Vacuum truck

The facility uses a vacuum truck service to vacuum up material that falls off process equipment in the Feed Building and other areas of the facility. Vacuumed material is returned to the C&B Building. According to Ivan, the service is onsite five days a week for eight hours a day and sometimes also on the weekends. Ivan explained that the facility maintains a log of the amount of material removed, but not the location where the material was collected. He said that the time sheets may contain information of the locations of the spillage.

July 2024 semi-annual report

EPA requested an update on the action items taken since the July 2024 semi-annual report submitted under the Consent Decree. EPA summarized the items as low pressure drops at PC-3 and 10 and the BC-2 north fan being offline. Eric told EPA that no corrective actions were needed at PC-3 and 10 associated with the low pressure drops, since the pressure drops quickly returned to normal once the cleaning mechanism delayed cleaning. Ivan explained that the clean cycles activate based on a high differential pressure, so when the pressure drop is low, the clean cycles won't activate. Regarding BC-2, Jeff explained that parts had been ordered for the north fan, and Eric told EPA that the fan had to be taken offline because it had issues. According to Jeff, BC-2 has two fans, with one serving as a backup, so BC-2 south fan has been operating continuously during this time.

O&M plan preventative maintenance inspections

Eric explained that the preventative maintenance systems maintain logs of the preventative maintenance inspections. According to Jeff, three people (Jeff, the foreman, and one other operator) conduct the daily, weekly, monthly, quarterly, and annual preventative maintenance inspections. They also conduct daily EPA Method 22 checks at the buildings. Jeff provided EPA a copy of a daily preventative inspection sheet for BC-D for October 1, 2024 to review during the inspection. When asked what additional checks are done during the monthly, quarterly, and annual inspections, Jeff said nothing extra was done. When asked again later, Jeff found a record of the monthly inspections which did include additional items. When asked whether the inspections included anything on the interior of the building, Jeff said that he does check the interior of the building to see if any doors are left open and if any velocity monitoring doors on the C&B building are left open, but that this is not recorded anywhere. He noted an example when a forklift hit a building but said that this was not documented. When asked for any checks done on the capture system, Jeff was not aware of any and explained that his checks focus on operations of the baghouses. Ivan explained that personnel clean out the

ductwork every shift for all baghouses. Operators frequently need to clean out screens and push material deposited in ducts forward to get picked up by the airflow to the baghouse. Pieces of truck liner plastic often get mixed in with the EAF dust and get lifted into the ducts and stuck on the screens. The process continues to operate during clean outs. When asked whether staff at the facility are familiar with the Operation and Maintenance (O&M) plans, Jeff said that they were not.

Work orders

When the preventative maintenance inspections identify issues, facility personnel will create work orders. Jeff showed EPA a September 19, 2024 work order for BC-E which was created in response to seeing puffs of emissions from the baghouse stacks. EPA asked whether this was identified during a Method 22 observation. Jeff found a copy of the Method 22 observation which did not show any visible emissions. Jeff explained that this was likely due with the time of day, since the Method 22 was likely completed earlier in the day than when the issue was identified. EPA also asked whether a Method 9 reading was done to assess opacity from the stack. Jeff looked in the files and said there was no Method 9 reading conducted.

Industrial Hygiene Monitoring

EPA asked Befesa staff what type of industrial hygiene monitoring is conducted onsite. Ivan explained that the facility does quarterly blood monitoring and also does industrial hygiene monitoring. When EPA asked which areas would result in the highest exposures, Ivan stated that the results of industrial hygiene monitoring conducted for Befesa employees would likely be higher in the Feed Building and in areas where employees are exposed to the crude zinc oxide (CZO) product, such as those employees that maintain the BC3 and BC10 baghouse, since CZO has a higher lead content than the incoming EAF dust.

TOUR INFORMATION

EPA Toured the Facility: Yes

Data Collected and Observations:

C&B Building

EPA inspectors observed BC-12 and identified flexible ducting on the BC-12 hopper with duct-tape (Images 2 – 4). EPA also noted dust deposition on the berm of the stormwater collection pond (Image 5). During the tour of BC-12, EPA asked Jeff to show EPA what is checked with the daily preventative maintenance inspections. Jeff showed EPA items that he checked on the exterior of the baghouse including at the fan, at the man door to the baghouse, and at the pulsators. When asked whether he inspects the interior of the baghouse, Jeff explained that the facility only checks the interior of the baghouse when issues on the exterior are identified. EPA inspectors noted an open natural draft opening at the exterior wall of the Truck Unloading Bay, near BC-12 (Image 6). An operator closed the natural draft opening shortly after EPA inspectors pointed it out (Image 10).

EPA observed mixing in the C&B Building from the control room located in between the Truck Unloading Bay and the Mixing Bay. The operator used a crane to separate plastic liners from the EAF

dust and to mix the dust and load it onto a conveyor to take the material to the feed building. The operator identified the pickup points to BC-11A and 11B which had considerable dust build up (Image 20).

Sasha Letuchy observed the C&B Building on the interior during truck unloading. Operators wash down the trucks with water in the Truck Unloading Bay following unloading. To complete the truck washing, the operator opened the C&B Building Truck Unloading Bay door and pulled the truck forward. With the door open, the operator sprayed down the truck with water. Emissions continued to be generated while the truck pulled forward and during the washing. Victoria Nelson observed the C&B Building on the exterior and BC12 during truck unloading (Video 2).

EPA inspectors identified holes and openings identified in the walls of the C&B Building in the Truck Unloading Bay and Rail Unloading Bay. These included smaller holes and openings around doorways and ducts. (Image 10, 14, 15 – 17, 18, 27, 29, and 30). Some of these openings had been repaired with tin siding (Image 10) following EPA's August 2024 inspection.

Next, EPA inspectors asked to see the pickup points associated with BC-E. Only one BC-E collection point was shown at the Coke conveyor. The enclosure around the Coke conveyor had large openings. The Coke conveyor was not operating during EPA's observations. Areas of the Rail Unloading Bay were covered in piles of EAF dust that became airborne when exterior doors were opened and when people walked on the surfaces.

Feed Building

Befesa staff showed EPA the baghouses associated with the Feed Building, including the hoppers that collect dust from the baghouses. The material in the hoppers is returned to the C&B Building. For each of the baghouses, the flexible ducting connecting the outlet of the baghouse and the hopper was misaligned and a gap was visible between the ducting and the hopper (BC-A1 and A2 hoppers – Images 44 – 46; BC-F – Images 73-74; BC-B – Images 76-77; and BC-C – Image 75). The BC-F hopper was missing a lid and was open.

EPA inspectors observed piles of EAF dust throughout the Feed Building on the floor, catwalks, stairs, and walls (Images 47-55). EPA also observed holes and openings in the exterior walls of the Feed Building through which material had left the Feed Building (Image 51) and through which nearby accumulated EAF dust could escape the Feed Building (Images 69-72). Material deposition outside the baghouse hoppers, on the ground, and on the Feed Building walls appears to demonstrate EAF dust leaving the Feed Building through holes and openings (Images 44-45, 48-51; Videos 7-9). During EPA's inspection, Pelletizer #1 was running. Inspectors observed significant dust emissions coming off the pelletizer. The pick-up point at pelletizer was not capturing the observed dust emissions (Videos 4-6).

Kiln #1 Crown Firing Building

EPA observed the pickup point for BC-D in the Kiln Crown Firing Building. The pickup point had evidence of material collected on the grating/vent and was potentially clogged. Additionally, the Crown Firing Building had large openings in the walls (Images 79 – 84).

Kiln #2 CZO Cooling Chamber Hopper

EPA observed dust coming from an operator's activities at the Kiln #2 area where material from the CZO cooling chamber ED-3 drag chain collects in a hopper near the Feed Building. The operator removed a tarp to partially cover the hopper being moved to transfer material back to the C&B Building causing visible emissions to be generated (Videos 10-11).

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

Field Measurements: were not taken during this inspection.

RECORDS REVIEW

EPA inspectors reviewed the following information while on-site:

- Sample visible emissions inspection forms
- Example inspection and corrective action records and related work orders
- Fenceline monitoring data for 2019 through 2024
- Vacuum truck data for October 2, 2024 which showed that 17 tons were returned to the C&B Building
- October 2, 2024 daily inspection checklist

CLOSING CONFERENCE

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

Requested documents:

1. Visible emission readings taken from 2021 to present
2. Method 9 readings taken from 2021 to present
3. Fenceline monitoring data for 2019 to present and a site map showing the placement of monitors and where manganese samples are taken
4. Throughput and production data (tons per day) for October 2021 to present, including incoming EAF dust, outgoing products, and outgoing waste
5. Records of vacuum trucked material transferred from the Feed building and other areas of the plant back to the C&B Building (tons per day)
6. Records of baghouse hopper material transferred to the C&B Building (tons per day)
7. Description of how hoppers are emptied when material collected in hopper baghouses is sent to the C&B Building
8. Pressure drop and fan amperage data as 15-min. averages for each dust collector for October 2021 to present
9. Summary of pressure drop and fan amperages ranges and set points in the control system/human monitoring interface
10. Records of daily, monthly, weekly, quarterly, semi-annual, and annual inspections at the dust collectors and capture systems, including the Feed Building and Curing & Blending Building, for

October 2021 to present and any related corrective actions, work orders, or Method 9 readings stemming from those inspections

11. Example forms used by operators and environmental staff for each type of inspection
12. Work orders and documentation for actions taken to address concerns noted in the August 2024 inspection
13. Industrial Hygiene monitoring data from 2021 to present
14. Fugitive dust plan
15. Results from any ambient samples taken on-site or at the fenceline since 2019, e.g., any lead or cadmium sampling
16. Composite sampling analysis for incoming EAF dust
17. Diagram of feed building conveyors/pick up points
18. Information associated with the locations where the vacuum truck collected dust. Befesa stated during the inspection that this information might be included on time sheets. If this information is not available, provide a narrative response with an estimate of the amount of dust collected in each location serviced by the vacuum truck as a percentage.

Compliance Assistance: EPA recommended that the facility seal up openings in the C&B Building and Feed Building and send EPA photos when this work is completed. EPA also recommended that the facility start conducting inspections of the buildings to look for openings in the walls to its daily inspection checklist and also review its inspection checklists against the O&M plans.

Concerns: During the closing conference, EPA noted the following concerns:

1. Holes and openings identified in the walls of the C&B Building and the Feed Building. These included smaller holes in the exterior walls and openings around doorways and ducts.
2. Significant deposition of material throughout the Feed Building is an indication of poor capture.
3. Emissions capture at the Pelletizer #1 pickup points was poor.
4. Piles of EAF dust observed under one opening of the Feed Building. Potential for emissions leaving the building is high given the deposition of material throughout the building and numerous openings in the Feed Building walls and unsealed doors.
5. The O&M plans require a significant number of preventative maintenance inspections which were not described by personnel as part of their normal practices, including inspections of the hoods/ducts indoors.
6. Overhead doors in the Truck Unloading Bay were open while emissions associated with truck dumping and truck washing were still being generated.
7. The C&B Building did not appear to be structurally sound, due to supports propping up the building.

Facility Name: Befesa Zinc US Inc. (Befesa)
Facility Location: 2701 East 114th Street, Chicago, Illinois
Date of Inspection: October 2, 2024

DIGITAL SIGNATURES

Report Author: **VICTORIA NELSON**
Digitally signed by VICTORIA NELSON
Date: 2024.10.15 13:33:49 -05'00'

Section Supervisor: **SARAH MARSHALL**
Digitally signed by SARAH MARSHALL
Date: 2024.10.15 13:38:33 -05'00'

APPENDICES

1. Appendix A: Digital Video Log and Digital Image Log

Facility Name: Befesa Zinc US Inc. (Befesa)
Facility Location: 2701 East 114th Street, Chicago, Illinois
Date of Inspection: October 2, 2024

APPENDIX A: DIGITAL VIDEO LOG AND DIGITAL IMAGE LOG

Inspector Name: Victoria Nelson and Alexandra Letuchy **Archival Record Location:** R5 Electronic
Record Center – ECAD/AECAB
Library/CD_Befesa_IL_20/2024
Inspection/Photos

Video Number	File Name	Date and Time (Central Time)	Latitude and Longitude	Description of Video
1	MVI_1254.MOV	10/2/2024 12:43		C&B Building Truck Unloading Bay
2	MVI_1255.MOV	10/2/2024 12:45		BC-12 and exterior view of the C&B Building during truck unloading
3	MVI_1274.MOV	10/2/2024 13:15		C&B Building Railcar Unloading Bay
4	MVI_1283.MOV	10/2/2024 13:31		Operating Pelletizer #1 in the Feed Building
5	MVI_1284.MOV	10/2/2024 13:33		Operating Pelletizer #1 in the Feed Building
6	MVI_1285.MOV	10/2/2024 13:34		Operating Pelletizer #1 in the Feed Building
7	MVI_1286.MOV	10/2/2024 13:35		Collected material near opening in the Feed building exterior wall
8	MVI_1287.MOV	10/2/2024 13:35		Collected material near opening in the Feed building exterior wall
9	MVI_1288.MOV	10/2/2024 13:36		Collected material near opening in the Feed building exterior wall
10	MVI_1327.MOV	10/2/2024 14:33		Visible emissions from operator activity – transfer of hopper from CZO cooling chamber EB3 drag chain box back to C&B building
11	MVI_1328.MOV	10/2/2024 14:35		Visible emissions from operator activity – transfer of hopper from

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				CZO cooling chamber EB3 drag chain box back to C&B building
Image Number	File Name	Date and Time (incl. Time zone and DST)	Latitude and Longitude	Description of Image
1	IMG_1233.JPG	10/2/2024 10:33		Parking lot outside the facility fence
2	IMG_1234.JPG	10/2/2024 11:56		BC-12 hopper with duct-taped flexible ducting
3	IMG_1235.JPG	10/2/2024 11:57		BC-12 hopper with duct-taped flexible ducting
4	IMG_1236.JPG	10/2/2024 11:57		BC-12 hopper with duct-taped flexible ducting
5	IMG_1237.JPG	10/2/2024 11:58		Dust deposition on the berm of the stormwater collection pond next to the C&B Building
6	IMG_1238.JPG	10/2/2024 12:02		Exhaust duct to BC-12 and exterior wall of the Truck Unloading Bay of the C&B Building. Open natural draft opening.
7	IMG_1239.JPG	10/2/2024 12:13		BC-12
8	IMG_1240.JPG	10/2/2024 12:13		BC-12
9	IMG_1241.JPG	10/2/2024 12:15		Repair made to foundation below Truck Unloading Bay
10	IMG_1242.JPG	10/2/2024 12:16		Exterior wall of the Truck Unloading Bay with siding patches covering holes and cracks in the original siding
11	IMG_1243.JPG	10/2/2024 12:21		Material collection point and BC-12 pickup point in Truck Unloading Bay
12	IMG_1244.JPG	10/2/2024 12:22		Material collection point and BC-12 pickup point in Truck Unloading Bay
13	IMG_1245.JPG	10/2/2024 12:22		Material collection point and BC-12 pickup point in Truck Unloading Bay
14	IMG_1246.JPG	10/2/2024 12:22		BC-12 pickup point and exhaust duct with opening where the duct exits the exterior wall of the Truck Unloading Bay
15	IMG_1247.JPG	10/2/2024 12:25		Holes in the exterior wall of the Truck Unloading Bay
16	IMG_1248.JPG	10/2/2024 12:25		Holes in the exterior wall of the Truck Unloading Bay

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17	IMG_1249.JPG	10/2/2024 12:25		Holes in the exterior wall of the Truck Unloading Bay
18	IMG_1250.JPG	10/2/2024 12:26		Opening in the Truck Unloading Bay exterior wall where pipe leaves the building
19	IMG_1251.JPG	10/2/2024 12:27		Roof of the Truck Unloading Bay with natural draft opening
20	IMG_1252.JPG	10/2/2024 12:39		C&B Building Mixing Bay
21	IMG_1253.JPG	10/2/2024 12:40		Human monitoring interface/control system screen in the C&B Building Mixing Bay
22	IMG_1256.JPG	10/2/2024 12:52		Open Truck Unloading Bay door during truck washing following unloading
23	IMG_1257.JPG	10/2/2024 12:55		Open Truck Unloading Bay door during truck washing following unloading
24	IMG_1258.JPG	10/2/2024 12:57		BC-E and Coke collection hopper and conveyer to the Feed Building
25	IMG_1259.JPG	10/2/2024 13:02		Blurry image
26	IMG_1260.JPG	10/2/2024 13:03		Rail Unloading Bay
27	IMG_1261.JPG	10/2/2024 13:03		Holes in wall on Rail Unloading Bay door
28	IMG_1262.JPG	10/2/2024 13:03		Blurry image
29	IMG_1263.JPG	10/2/2024 13:04		Holes in wall on Rail Unloading Bay door
30	IMG_1264.JPG	10/2/2024 13:04		Interior view of openings and unsealed doorway in the wall of the C&B Building off the Rail Unloading Bay
31	IMG_1265.JPG	10/2/2024 13:05		Rail Unloading Bay floor
32	IMG_1266.JPG	10/2/2024 13:05		Material deposition near the door of the Rail Unloading Bay
33	IMG_1267.JPG	10/2/2024 13:05		Material deposition near the door of the Rail Unloading Bay
34	IMG_1268.JPG	10/2/2024 13:07		Additional supports at the C&B Building
35	IMG_1269.JPG	10/2/2024 13:07		Additional supports at the C&B Building
36	IMG_1270.JPG	10/2/2024 13:07		Disconnected drain pipe at the C&B Building above the Rail Unloading Bay door

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37	IMG_1271.JPG	10/2/2024 13:09		BC-E and Coke collection hopper and conveyer to the Feed Building
38	IMG_1272.JPG	10/2/2024 13:09		Coke conveyer to the Feed Building
39	IMG_1273.JPG	10/2/2024 13:15		Interior view of C&B Building near BC-E collection point and the Coke conveyer
40	IMG_1275.JPG	10/2/2024 13:17		Exterior view of openings and unsealed doorway in the wall of the C&B Building off the Rail Unloading Bay
41	IMG_1276.JPG	10/2/2024 13:18		Holes in the walls of the BC-E pick-up point at the Coke conveyer transfer point
42	IMG_1277.JPG	10/2/2024 13:18		Holes in the walls of the BC-E pick-up point at the Coke conveyer transfer point
43	IMG_1278.JPG	10/2/2024 13:20		Holes in the walls of the BC-E pick-up point at the Coke conveyer transfer point
44	IMG_1279.JPG	10/2/2024 13:24		BC-A1 hopper
45	IMG_1280.JPG	10/2/2024 13:24		BC-A2 hopper with misfitting flexible ducting
46	IMG_1281.JPG	10/2/2024 13:24		BC-A2 hopper with misfitting flexible ducting
47	IMG_1282.JPG	10/2/2024 13:29		Material deposition at top of Pelletizer #1 in the Feed Building
48	IMG_1289.JPG	10/2/2024 13:36		EAF deposition on siding installed to patch holes in the Feed Building wall sometime between August 2024 and October 2, 2024
49	IMG_1290.JPG	10/2/2024 13:37		EAF deposition on siding installed to patch holes in the Feed Building wall sometime between August 2024 and October 2, 2024
50	IMG_1291.JPG	10/2/2024 13:38		Feed Building door and new siding installed to patch holes in the Feed Building wall sometime between August 2024 and October 2, 2024
51	IMG_1292.JPG	10/2/2024 13:38		EAF dust exiting an opening in the Feed Building wall
52	IMG_1293.JPG	10/2/2024 13:38		Opening in the exterior wall of the Feed Building

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53	IMG_1294.JPG	10/2/2024 13:41		Hole at piping exiting the Feed Building wall
54	IMG_1295.JPG	10/2/2024 13:42		Interior view of EAF dust collecting at an opening in the exterior wall of the Feed Building
55	IMG_1296.JPG	10/2/2024 13:42		Interior view of EAF dust collecting at an opening in the exterior wall of the Feed Building
56	IMG_1297.JPG	10/2/2024 13:43		Pick-up point and torn skirt at non-operating Pelletizer #2 in the Feed Building
57	IMG_1298.JPG	10/2/2024 13:43		Pick-up point and torn skirt at non-operating Pelletizer #2 in the Feed Building
58	IMG_1299.JPG	10/2/2024 13:44		EAF deposition near openings in the base of the Feed Building exterior wall
59	IMG_1300.JPG	10/2/2024 13:47		EAF dust deposition under a conveyor in the Feed Building
60	IMG_1301.JPG	10/2/2024 13:47		EAF dust deposition under a conveyor in the Feed Building
61	IMG_1302.JPG	10/2/2024 13:47		EAF dust deposition under a conveyor in the Feed Building
62	IMG_1303.JPG	10/2/2024 13:47		Openings in the exterior walls of the Feed Building
63	IMG_1304.JPG	10/2/2024 13:48		Unsealed doors and EAF dust deposition at the exterior wall of the Feed Building
64	IMG_1305.JPG	10/2/2024 13:48		Unsealed doors and EAF dust deposition at the exterior wall of the Feed Building
65	IMG_1306.JPG	10/2/2024 13:49		Coke and EAF deposition in the Feed Building
66	IMG_1307.JPG	10/2/2024 13:49		Coke and EAF deposition near unsealed doors in the Feed Building
67	IMG_1308.JPG	10/2/2024 13:52		EAF material deposition in the Feed Building
68	IMG_1309.JPG	10/2/2024 13:52		EAF material deposition in the Feed Building
69	IMG_1310.JPG	10/2/2024 13:53		Unsealed door in the exterior wall of the Feed Building

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70	IMG_1311.JPG	10/2/2024 13:53		EAF deposition near unsealed door in the exterior wall of the Feed Building
71	IMG_1312.JPG	10/2/2024 13:53		Unsealed door in the exterior wall of the Feed Building
72	IMG_1313.JPG	10/2/2024 13:54		EAF deposition on the wall near opening in the exterior wall of the Feed Building
73	IMG_1314.JPG	10/2/2024 13:58		Open BC-F hopper with misfitting ducting and missing lid
74	IMG_1315.JPG	10/2/2024 13:58		Open BC-F hopper with misfitting ducting and missing lid
75	IMG_1316.JPG	10/2/2024 13:58		EAF deposition outside of BC-C hopper with misfitting ducting and openings
76	IMG_1317.JPG	10/2/2024 14:00		EAF deposition outside of BC-B hopper with misfitting ducting
77	IMG_1318.JPG	10/2/2024 14:00		EAF deposition outside of BC-B hopper with misfitting ducting
78	IMG_1319.JPG	10/2/2024 14:01		IRM collector and disconnected piping
79	IMG_1320.JPG	10/2/2024 14:06		Opening in the exterior wall of the Kiln #2 Crown Firing Building
80	IMG_1321.JPG	10/2/2024 14:06		Opening in the exterior wall of the Kiln #2 Crown Firing Building
81	IMG_1322.JPG	10/2/2024 14:06		Opening below a doorway near the Kiln #2 door in the exterior wall of the Kiln #2 Crown Firing Building
82	IMG_1323.JPG	10/2/2024 14:06		Large opening in the exterior wall of the Kiln #2 Crown Firing Building
83	IMG_1324.JPG	10/2/2024 14:07		Large opening in the exterior wall of the Kiln #2 Crown Firing Building
84	IMG_1325.JPG	10/2/2024 14:07		Large opening in the exterior wall of the Kiln #2 Crown Firing Building
85	IMG_1326.JPG	10/2/2024 14:31		BC-D pick-up point in the Kiln #2 Crown Firing Building