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

DATE: ***September 21, 2021***

SUBJECT: CLEAN AIR ACT INSPECTION REPORT
Gatto Industrial Platers, Inc., Chicago, IL

FROM: Emma Leeds, Environmental Engineer
AECAB (IL/IN)

THRU: Nathan Frank, Section Chief
AECAB (IL/IN)

TO: File

BASIC INFORMATION

Facility Name: Gatto Industrial Platers, Inc. (Gatto)

Facility Location: 4620 Roosevelt Rd., Chicago, IL 60644

Date of Inspection: 7/26/21

EPA Inspector(s):
1. Emma Leeds, Environmental Engineer
2. Victoria Nelson, Environmental Engineer

Other Attendees:
1. George Gatto Jr., President – Gatto Industrial Platers, Inc.
2. Andrew Gruda, Technical Director – Gatto Industrial Platers, Inc.

Contact Email Address: g.gattojr@gattoplaters.com

Purpose of Inspection: To assess compliance with any applicable Clean Air Act regulations

Facility Type: Electroplating Facility

Regulations Central to Inspection: 40 CFR Part 63 Subpart WWWWWW – National Emission Standards for Hazardous Air Pollutants (NESHAP): Area Source Standards for Plating and Polishing Operations

Arrival Time: 2:50 PM
Departure Time: 4:00 PM

Inspection Type:
☒ Unannounced Inspection
☐ Announced Inspection

OPENING CONFERENCE

☒ Presented Credentials
☒ Stated authority and purpose of inspection
☒ Provided Small Business Resource Information Sheet (via email following inspection)
☒ Provided CBI warning to facility

The following information was obtained verbally from Gatto Industrial Platers, Inc. unless otherwise noted.

Process Description:
Gatto provides zinc plating, zinc-nickel plating, and aluminum chromating to customers for a wide range of products, with unique capabilities for plating large-scale industrial products. The process begins when parts are received at the facility and first go through an alkaline cleaner followed by a hydrochloric acid bath to activate the metal surfaces for plating. Parts are then set up for either barrel plating or rack plating depending on their size, and then are electroplated with a zinc or zinc-nickel solution. The batch time for the electroplating process ranges from 10 minutes to 4 hours. After plating, some parts are dried in ovens and then sent to chromate conversion baths for further corrosion protection, which involves dunking and agitating the parts twice. Lastly, parts are washed, dried, inspected, and then packaged and loaded to be returned to customers.

Staff Interview: The facility was first opened in 1988 and currently has approximately 150 employees. The facility has four lines for zinc and zinc-nickel plating, including one line that can plate parts up to 27 feet long, and one much smaller line for aluminum chromating. Etching can also be performed on the aluminum chromate line. Gatto personnel estimated that 300 tons of parts are plated per day, with 60% of production going through the zinc rack plating line. Overall, approximately 30% of parts receive zinc-nickel plating and 70% receive zinc plating.

The solutions in the electroplating tanks, chromate conversion tanks, and cleaning tanks are all heated anywhere from 90 degrees Fahrenheit (° F) to 140 ° F. The facility also has ten bake ovens and two natural gas boilers. Only one boiler is operated at a time.

Gatto personnel claimed that the facility does not have any air permits from the federal, state, or municipal government and did not believe that any air regulations applied to their facility. The facility does not use any air control equipment or practices, including but not limited to fume suppressants, and do not create any semiannual or annual reports required by the Clean Air Act.

Approximately 6 different types of chromate are used at the facility for chromate conversion process, including hexavalent and trivalent chromate, chosen depending on the level of corrosion prevention required by the customer. Gatto also offers aluminum chromating, which is applied to approximately 10% of products. The facility does not offer polishing services.

TOUR INFORMATION

EPA Tour of the Facility: Yes

Data Collected and Observations:
EPA inspectors toured the facility from around 3:15 PM to 3:40 PM, accompanied by Mr. Gruda and Mr. Gatto. The tour began in the zinc-nickel electroplating portion of the facility, where both barrel and rack plating were occuring. Employees rolled around large bins and racks between different processes, sometimes sliding bins unmanned across the facility floor. Inspectors noticed multiple puddles of bright yellow liquid that seemed to be seeping from the ground in highly trafficked areas. Mr. Gatto claimed that the liquid was from their electroplating solutions and would all drain into the on-site wastewater treatment system.

Next inspectors observed one of the zinc rack plating lines, followed by the aluminum chromating line which was in a separate room and did not appear to be operating during the inspection. Mr. Gatto explained that the aluminum chromating line is used on a daily basis. Inspectors next walked through the wastewater treatment portion of the facility, which included a belt press and a large settling tank for coagulation and filtration, amongst other processes. Inspectors noticed a tank in the wastewater treatment area that was overflowing with approximately 2 feet high of bubbles. Mr. Gruda claimed that the tank usually looks this way, and that it is a sign that the water is being cleaned properly. Mr. Gruda and Mr. Gatto also claimed that the entire facility has a secondary containment system and that all drains within the facility lead to their wastewater treatment system.

Following the wastewater treatment system, inspectors walked through the packaging and shipping warehouse area. Mr. Gatto explained that the facility has their own fleet of five trucks for pick-up and shipping of parts and plans to expand.

Inspectors next observed the "King Kong line," which is used for zinc electroplating on large parts up to 27 feet long. Outside, inspectors observed four large plastic hydrochloric acid storage tanks and three large temporary storage tanks. Mr. Gatto explained that the temporary storage tanks are used for electroplating solutions if any of the lines require maintenance, and estimated that the electroplating tanks leak approximately once a year.

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

Field Measurements: were not taken during this inspection.

CLOSING CONFERENCE

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

Requested documents:

- Safety data sheets for all zinc-nickel electroplating materials used by the facility

Concerns: EPA inspectors explained that the facility may be subject to NESHAP WWWWWW regulations for area source plating and polishing operations depending on the nickel content in their zinc-nickel electroplating solutions. At the time of the inspection, the facility was not complying with these regulations because they did not believe they were subject.

Inspectors also expressed concern about the puddles of electroplating solution on the floor throughout the facility, and about the overflowing tank in the wastewater treatment system.

SIGNATURES

X Leeds, Emma

Digitally signed by Leeds, Emma
Date: 2021.09.21 10:16:49 -05'00'

Emma Leeds
Report Author

X NATHAN FRANK

Digitally signed by NATHAN FRANK
Date: 2021.09.22 11:41:06 -05'00'

Nathan Frank
Section Chief

APPENDICES AND ATTACHMENTS

1. Appendix A - Digital Image Log

Contains Items Claimed as CBI – Non-Releasable
Facility Name: Gatto Industrial Platers, Inc.
Facility Location: 4620 Roosevelt Rd., Chicago, IL 60644
Date of Inspection: July 26, 2021

CONFIDENTIAL BUSINESS INFORMATION ATTACHMENT

Facility Name: Gatto Industrial Platers, Inc.
Facility Location: 4620 Roosevelt Rd., Chicago, IL 60644
Date of Inspection: July 26, 2021

All photos are considered CBI.

Facility Name: Gatto Industrial Platers, Inc.
Facility Location: 4620 Roosevelt Rd., Chicago, IL 60644
Date of Inspection: July 26, 2021

APPENDIX A: DIGITAL IMAGE LOG

1. **Inspector Name:** Victoria Nelson	2. **Archival Record Location:** https://usepa.sharepoint.com/:f:/r/sites/R5_Work/r5erc/ecad/AECAB%20Library/Enf_GattoIndustrial_IL_21/Enf_GattoIndustrial_IL_21_Inspection/Digital%20Image%20Log?csf=1&web=1&e=ly9rOq

Image Number	File Name	Date and Time (Central Time)	Description of Image
1	IMG_1247.JPG	07/26/2021; 15:18:09	Zinc-nickel barrel plating line **[CBI]**
2	IMG_1248.JPG	07/26/2021; 15:21:37	Bright yellow puddles of zinc / zinc-nickel liquid **[CBI]**
3	IMG_1249.JPG	07/26/2021; 15:33:19	Large indoor settling pond, part of wastewater treatment process **[CBI]**
4	IMG_1250.JPG	07/26/2021; 15:37:33	Ovens for drying parts between electroplating and chromate conversion **[CBI]**
5	IMG_1251.JPG	07/26/2021; 15:37:48	Ovens for drying parts between electroplating and chromate conversion **[CBI]**