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Air Enforcement: U.S. Environmental Protection Agency and Chicago Steel Pickling Facility Enter into Consent Agreement

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The United States Environmental Protection Agency ("EPA") and Nacme Steel Processing, LLC ("NSP") entered into an August 7th Consent Agreement and Final Order ("CAFO") addressing an alleged Clean Air Act violation. See Docket No. CAA-05-2025-0039.

The CAFO provides that NSP owns and operates a steel pickling facility in Chicago, Illinois.

The facility is stated to include the operation of a steel coil pickling line that includes four HCl tanks connected in a series controlled by a scrubber. This includes the ownership and operation of an "emission source" within the meaning of Section 114(a)(1) of the Clean Air Act.

EPA is stated to have conducted an inspection of the facility on December 9, 2021, to evaluate compliance with the Clean Air Act.

Further, pursuant to Section 114(a) of the Clean Air Act, EPA issued a request to provide information. In response NSP provided EPA with the following:

- Records of pressure drop.
- Temperature of the pickling tanks.
- Steel coil throughput.
- Scrubber manufacturer's recommendations.
- HCl usage from January 1, 2018, to December 10, 2021.

After a meeting between the parties, EPA requested that NSP conduct a performance test for HCl and particulate matter (PM) at the inlet and outlet of the pickling line scrubber. The performance test was submitted to EPA and the CAFO provides that NSP complied with its FESOP – HCl emissions limitation of 10 tons/year while operating at adjusted pickling tank and scrubber operating parameters.

The CAFO provides that NSP violated Condition 9(a)(iv) of its FESOP by exceeding the maximum pickling tank temperature of 190°F in the pickling tanks on 6,085 occasions, from September 25, 2018, to December 10, 2021.

NSP neither admits nor denies the allegations in Section E of the CAFO.

A civil penalty of \$49,900.00 is assessed.

A copy of the CAFO can be downloaded [here](#).

