



United States Environmental Protection Agency
Region 7
Enforcement and Compliance Assurance Division

Air Branch

**Air Branch Inspection Report
Unannounced Full Compliance Evaluation**

Loparex, Inc.

2000 Industrial Park Road
Iowa City, Iowa 52240
FRS# 110017406608

Inspection Date(s):

December 10-11, 2024

Christopher Appier, Inspector, ECAD, Air Branch

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APPENDICES

- A – DART Monitoring Report (# pages)
- B – Confidential Business Information (2 pages)
- C – Receipt for Samples (1 page)
- D – Field Video Log (1 page)
- E – Field Photograph Log (74 pages)

**This Contents page shows all the sections contained in this report
and provides a clear indication of the end of this report.**

INSPECTION OVERVIEW

INSPECTION OBJECTIVE

The objective of the full compliance evaluation (FCE) inspection was to determine compliance of the facility with the Clean Air Act (CAA), specifically those requirements listed in **Table 1**. The facility was identified as a possible source of odors and flagged for further investigation during an ambient air monitoring campaign conducted by the EPA in August 2024. The monitoring campaign report can be found in **Appendix A**.

Table 1. Applicable Regulations

Code of Federal Regulation	Standard Name
40 CFR Part 60	Subpart A, General Provisions
40 CFR Part 60	Subpart RR, Standards of Performance for Pressure Sensitive Tape and Label Surface Coating Operations
40 CFR Part 63	Subpart A, General Provisions
40 CFR Part 63	Subpart KK, National Emission Standards for the Printing and Publishing Industry
40 CFR Part 63	Subpart JJJJ, National Emission Standards for Hazardous Air Pollutants: Paper and Other Web Coating
40 CFR Part 63	Subpart DDDDD, National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters

Table 2 lists the inspection team members.

Table 2. Project Team Members

Team Member	Organization	Project Role
Christopher Appier	EPA Region 7, ECAD, Air Branch	Lead inspector
Ryan Stouder	Iowa Department of Natural Resources (IDNR)	Field team member

FACILITY CONTACT INFORMATION

Table 3 lists the primary facility contacts alphabetically.

Table 3. Facility Contact Information

Name, Title	Phone No.	Email Address
Bill Fahey, Maintenance and Engineering Manager	(708) 927-2904	bill.fahey@loparex.com
Marc Tucker, EHS Manager	(319) 538-4029	marc.tucker@loparex.com
Heather Schebel, Environmental Consultant	(515) 710-1059	heather@schebelplc.com

FACILITY OVERVIEW

The facility began operations in 1969. Loparex purchased the facility in 2001. The facility is operated 24 hours a day, 7 days a week and employs approximately 165 employees.

The facility produces specialty paper and film release liners. Operations include chemical storage and mixing, paper and film treatment, primer and coating applications, drying, printing, cutting, and auxiliary heat production.

The last onsite compliance monitoring activity at the facility was on December 19, 2022, and consisted of a FCE inspection conducted by IDNR. IDNR completed a Title V certification review on March 29, 2024.

According to EPA's [Enforcement and Compliance History Online](#) (ECHO) website, there has been one formal enforcement action at this facility in the past five years. EPA issued an Administrative Order on June 7, 2022, under the Resource Conservation and Recovery Act (RCRA) program.

According to Loparex's Title V operating permit issued by the Iowa Department of Natural Resources (IDNR) on March 17, 2022, the facility is subject to the regulations and standards subject to review during this inspection as noted in **Table 1**.

FACILITY OPERATIONS SUMMARY

The facility consists of nine production lines that produce various specialty paper and film release liners, and auxiliary equipment such as mixing booths and a boiler. Table 4 shows the various emission units for each production line and which regulation is applicable.

Table 4. Emission Units and Applicable Regulations

Line	Emission Point	Emission Unit	Description	NSPS	NESHAP
3	EP-003-1	EU-003-1	Corona Treater	RR	JJJJ
	EP-003-2	EU-003-2	Electron Beam Curing #1	RR	JJJJ
	EP-003-3	EU-003-3	Electron Beam Curing #2	RR	JJJJ
	EP-003-5	EU-003-5	UV Cure	RR	JJJJ
8	EP-008-1	EU-008-1A	Primer Coater		JJJJ
		EU-008-1B	Primer Coating Dryer		JJJJ
	EP-008-3	EU-008-3	Extrusion Coater		
	EP-008-4	EU-008-4	Print Treater		
12	EP-012-1A	EU-012-1C	Press Printer		KK
		EU-012-1D	Infrared Oven		KK
	EP-012-1	EU-012-1A	Primer Coater 1		KK
		EU-012-1B	Primer Dryer 1		KK
	EP-012-2	EU-012-2	Extruder Laminator 1		KK
	EP-012-3	EU-012-3	Primer Coater and Dryer 2		KK
	EP-012-4	EU-012-4	Extruder Laminator 2		KK
	012-5a	012-5-1a	Infeed Corona Treater		
		012-5-1b	Infeed Corona Treater		
	012-5b	012-5-2	Extruder #1 Treater		

	012-5c	012-5-3	Extruder #2 Treater		
14	EP-014-1	EU-014-1	Print Treater		JJJJ
	EP-014-3C	EU-014-3C	Silicon Coating Dryer 1, Zone 3		JJJJ
	EP-014-5C	EU-014-5C	Silicon Coating Dryer 2, Zone 3		JJJJ
	EP-014/016	EU-014-2	Floor Sweep from Coating Booth		JJJJ
		EU-014-3A	Silicon Coating Dryer 1, Zone 1		JJJJ
		EU-014-3B	Silicon Coating Dryer 1, Zone 2		JJJJ
		EU-014-5A	Silicon Coating Dryer 2, Zone 1		JJJJ
		EU-014-5B	Silicon Coating Dryer 2, Zone 2		JJJJ
		EU-014-6	Mixing Booth		
		EU-016-2	Floor Sweep from Coating Booth		JJJJ
		EU-016-3A	Silicon Coating Dryer 3, Zone 1		JJJJ
		EU-016-3B	Silicon Coating Dryer 3, Zone 2		JJJJ
		EU-016-3C	Silicon Coating Dryer 3, Zone 3		JJJJ
		EU-022-2	Rod Coating Head	RR	JJJJ
		EU-022-3	Arch Type Dryer Oven	RR	JJJJ
22	EP-022-1	EU-022-1	Mixing Room		
	EP-022-3	EU-022-2	Bypass: Rod Coating Head	RR	JJJJ
		EU-022-3	Bypass: Arch Type Dryer Oven	RR	JJJJ
	EP-022-4	EU-022-4	Corona Treater	RR	JJJJ
15	EP-015-1	EU-015-1a	Ink Dryer (2 MMBtu/hr)		KK
		EU-015-1b	Ink Application		KK
	EP-15-2	EU-15-2	Mix Booth		
16	EP-016-1	EU-016-1a	Corona Treater		JJJJ
		EU-016-1b	Flame Treater		JJJJ
	EP-016-4	EU-016-4	Mixing Area for Silicon Coatings		JJJJ
17	EP-017-1	EU-017-1	Corona Print Treater	RR	JJJJ
	EP-017-2 & EP-017-BP	EU-017-2	Coating Booth Floor Sweep	RR	JJJJ
		EU-017-3A	Silicon Coating Oven, Zone 1	RR	JJJJ
		EU-017-3B	Silicon Coating Oven, Zone 2	RR	JJJJ
	EP-017-3	EU-017-3C	Silicon Coating Oven, Zone 3	RR	JJJJ
	EP-017-4	EU-017-3D	Silicon Coating Oven, Zone 4	RR	JJJJ
	EP-17-5	EU-017-4	Mix Booth		
18	EP-17-6	EU-017-5	Auxiliary Heater		DDDDD
	EP-018-1	EU-018-1	Print Treater	RR	JJJJ
	EP-018-2 & EP-018-BP	EU-018-2	Coating Booth Floor Sweep	RR	JJJJ
		EU-018-3A	Silicon Coating Oven, Zone 1	RR	JJJJ
		EU-018-3B	Silicon Coating Oven, Zone 2	RR	JJJJ
	EP-018-3	EU-018-3C	Silicon Coating Oven, Zone 3	RR	JJJJ
	EP-018-4	EU-018-3D	Silicon Coating Oven, Zone 4	RR	JJJJ
	EP-018-5	EU-018-4	Mix Booth		
	EP-018-6	EU-018-5	Auxiliary Heater		DDDDD
	EP-018-7	EU-018-6	Boiler		DDDDD

	EP-018-8	EP-018-7	Flame Treater		
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FIELD ACTIVITIES SUMMARY

I arrived at the facility on December 10, 2024, at 9:30 a.m. I completed a drive by surveillance and did not observe visible emissions. I made entry at the front door at 9:45 a.m. and introduced myself and Ryan Stouder, presented my credentials, and provided my business card to Mr. Tucker. I conducted an opening conference during which I explained that the purpose of the visit was to conduct an inspection to determine compliance with the CAA, specifically, to determine compliance with the regulations and standards listed in **Table 1**. I explained that after asking for some general business information, I would observe process units, emission units, control equipment, and also review associated records demonstrating compliance with the applicable permit and regulatory requirements. I explained to Mr. Tucker that the facility would have an opportunity to make a claim of business confidentiality at the end of the inspection and provided him with a Confidential Business Information (CBI) form. Mr. Tucker did make a claim of confidentiality (**Appendix B**).

After the opening conference, I asked Messers. Tucker and Fahey questions about the facility's operations, reviewed the facility map, and discussed their investigations into community odor complaints.

The inspection team was given a facility tour by Messers. Fahey and Tucker. I wore a hard hat, steel toed boots, safety glasses, ear plugs, and cut resistant gloves during the facility tour per my site health and safety plan.

I obtained copies of the records as indicated on the Receipt for Documents (**Appendix C**) via a shared OneDrive folder. The documents were uploaded on December 12, 2024, through January 6, 2025. I received a paper copy of the facility map during the inspection.

I conducted optical gas imaging which is described in the **Measurement Activities** section below.

We broke for lunch at 11:45 a.m. and returned to the inspection at 12:45 p.m. The facility tour continued with Mr. Fahey and Ms. Schebel. After the facility tour, I discussed emission calculations with Ms. Schebel. I left the facility at 3:10 p.m.

I returned to the facility at 8:35 a.m. on December 11, 2024. Ms. Schebel and I continued our discussion on emission calculations. I also discussed the facility's wastewater handling with Mr. Fahey.

I conducted a closing conference with the facility contacts listed in Table 3. I provided the facility with copies of the CBI form and a Receipt for Documents. I left the facility at 10:15 a.m.

Observations and potential findings from the facility tour, records review, and measurement activities are noted in the **Investigation Observation and Potential Findings** section below.

Measurement Activities

I conducted optical gas imaging throughout the entire facility during the onsite inspection. A video was captured when emissions were observed and can be found in **Appendix D. Table 5** summarizes field measurement and field sampling activities.

All environmental measurement activities were performed in accordance with the EPA Region 7 quality system.

Table 5 summarizes field measurement activities.

Table 5. Field Measurement Activities

Date	Method and/or Procedure ¹ , and Equipment	Measurer Name
December 10, 2024	Region 7 procedure: <i>FLIR ThermoCAM™ GasFindIR, GF320, and Similar Infrared Cameras</i> Equipment: FLIR GX320, C15517 - FLIR GX320 – 10400138	Christopher Appier
¹ The current version of each procedure, at the time of the investigation, was followed.		

INVESTIGATION OBSERVATIONS AND POTENTIAL FINDINGS

Ambient weather, site conditions, and field activities were documented in the field records. All photographs are attached as **Appendix E**. I made the following observations during the inspection. I discussed all observations with facility representatives during the closeout meeting unless otherwise noted in the observation description.

These observations are not final compliance determinations. The EPA Region 7 Air Branch case review team will make the final compliance determinations based on its review of this report and other technical, regulatory, and facility information.

The equipment present at the facility appears to match the equipment listed in the facility's permits.

During the inspection, I observed emissions coming from the equipment in the line 14 mixing room. A video was recorded and can be seen in Appendix D. I did not observe any leaks from the underground storage tanks outside of the facility.

The records submitted to demonstrate compliance with the regulations listed in Table 1 are still under review as of the time of this report writing.

End of report.