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

DATE: ***May 26, 2021***

SUBJECT: CLEAN AIR ACT INSPECTION REPORT
Libra Industries, Inc., Chicago, Illinois

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

THRU: Constantinos Loukeris, Acting Section Chief
AECAB (IL/IN)

TO: File

BASIC INFORMATION

Facility Name: Libra Industries, Inc.

Facility Location: 1951 Arthur Ave., Elk Grove Village, IL 60007

Date of Inspection: April 29 & 30, 2021

EPA Inspector(s):
1. Emma Leeds, Environmental Engineer
2. Karina Kuc, Environmental Engineer
3. Daniel Heins, Environmental Scientist
4. Brianna Fenzl, Environmental Engineer

Other Attendees:
1. Charles Lagoni – Libra Industries, Inc.
2. Bill Maki – Libra Industries, Inc.
3. Jennifer Kinsella – Libra Industries, Inc.

Contact Email Address: Clagoni@librasafety.com

Purpose of Inspection: To determine compliance with the Clean Air Act 40 CFR 63 Subpart M – Dry Cleaning NESHAP

Facility Type: Industrial dry-cleaning and reconditioning for personal protective equipment

Virtual Conference (4/29) Start Time: 1:00 PM
Virtual Conference (4/29) End Time: 2:30 PM
On Site (4/30) Arrival Time: 12:30 PM
On Site (4/30) Departure Time: 1:15 PM

Inspection Type:
☐ Unannounced Inspection
☒ Announced Inspection

OPENING CONFERENCE

☒ Presented Credentials
☒ Stated authority and purpose of inspection
☒ Provided Small Business Resource Information Sheet
☒ Provided CBI warning to facility

The following information was obtained verbally from Libra Industries, Inc. representatives.

Process Description:
Libra Industries, Inc. (Libra) cleans soiled personal protective equipment (PPE) for their industrial customers and returns the cleaned items for reuse. Libra predominantly clean gloves but also accept other types of PPE clothing. Eight perchloroethylene (PCE) dry-cleaning machines and five halogen-free organic solvent dry-cleaning machines are used to clean the soiled PPE materials. After dry-cleaning, materials are hand inspected on-site before they are sent back to their owners. The facility also has standard washing and drying machines that are used for certain materials.

To control volatile organic compound (VOC) and hazardous air pollutant (HAP) emissions created from the dry-cleaning process, each machine uses a refrigerated condenser with the exhaust passing through an activated carbon absorber. Concentrated dirty PCE is sent through a piping system to a Hydro-tech cooking machine which recycles PCE through a distillation process. The recovered PCE is sent back to dry-cleaning machines and the waste cake, composed of oils, metals and soil, is disposed as hazardous waste. The PCE recycling system is fully enclosed.

Staff Interview:
The facility began using the halogen-free organic solvent in 2008 to reduce perchloroethylene use. The halogen-free organic solvent machines are predominantly used for cotton materials and are not used for any leather or other skins because they leave a residue odor in these materials.

A photoionization detector is used to check the seals on the perchloroethylene machines and related piping on a weekly basis as part of the leak detection and maintenance plan.

TOUR INFORMATION

EPA Tour of the Facility: Yes

Data Collected and Observations:
Libra has not been using their Hoyt Sentinel – DF 2000 dry-cleaning machine because it is not as efficient as the other machines.

The carbon absorbers for the dry-cleaning machines are changed every two months.

Photos and/or Videos: were not taken during the inspection.

Field Measurements: were not taken during this inspection.

CLOSING CONFERENCE

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

Reviewed documents:
- 2019 Clean Air Act Permit Program permit
- Overview of emissions units and controls
- Process flow diagram for facility
- Monthly solvent use and VOC emissions for 2019 and 2020

Requested documents:
- PCE calculation spreadsheet
- Carbon absorber exhaust values
- Leak inspection records

SIGNATURES

X Emma Leeds Digitally signed by Emma Leeds Date: 2021.05.26 15:28:23 -05'00'

Emma Leeds
Report Author

X CONSTANTINOS LOUKERIS Digitally signed by CONSTANTINOS LOUKERIS Date: 2021.06.08 23:58:35 -05'00'

Constantinos Loukeris
Section Chief