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

SUBJECT:	CLEAN AIR ACT INSPECTION REPORT Edsal Manufacturing Company, Inc., Chicago, Illinois
FROM:	Karina Kuc, Environmental Engineer AECAB (IL/IN)
THRU:	Nathan Frank, Section Supervisor AECAB (IL/IN)
TO:	File

BASIC INFORMATION

Facility Name: Edsal Manufacturing Company, Inc.

Facility Location: 4400 and 4345 South Packers Avenue

Date of Inspection: August 11, 2022

EPA Inspectors:
1. Karina Kuc, Environmental Engineer
2. Victoria Nelson, Environmental Engineer

Other Attendees:
1. Ralph Herrera, Maintenance Manager

Contact Email Address: Bruce Murray - bmurray@edsal.com

Purpose of Inspection: to assess compliance with the facility's Clean Air Act Permit Program (CAAPP) permit and the Illinois State Implementation Plan (SIP)

Facility Type: furniture assembly and coating

Regulations Central to Inspection: applicable SIP regulations and permit requirements

Arrival Time: 9:45 AM
Departure Time: 10:50 AM

Inspection Type:

☒ Unannounced Inspection
☐ Announced Inspection

OPENING CONFERENCE

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

The following information was obtained verbally from company employees unless otherwise noted.

Company Ownership: Edsal Manufacturing Company, Inc (Edsal or the facility) was formerly a family-owned business but was sold to an investment company about 5-6 years ago.

Process Description: Edsal manufactures shelving units. Raw material comes in as blank steel, which is punched, formed and welded into shape. Each dip tank has a dedicated wash line. The pieces go through a washer to remove dirt and oil, are then rinsed with water, then go through a dryer. Next, the pieces are painted either in dip tanks or with automatic powder paint application and then baked in an oven for 30-45 minutes. Finally, the pieces are packed and shipped.

Staff Interview: The facility operates out of two buildings, 4400 S Packers Avenue and 4345 S Packers Avenue. In total, there are four spray booths, two manual touch-up spray booths, five ovens, and nine robotic welding stations. The ovens vent to the atmosphere. The powder paint booths have filters which reclaim the powder. The dip tanks contain water-based paint. The washers do not use degreasers but rather acidic or alkaline cleaners. Welding runs two shifts a day for four days a week.

The facility's CAAPP Permit No. 95120150 states that, "the Permittee shall only use coatings, thinners, and cleaning materials that contain no HAP on the Powder Coating Systems" and "the Dip Coating Systems shall use only coatings, thinners, and cleaning materials that contain no HAP". The safety Data Sheets (SDSs) obtained from the company indicate that the products do not contain any Hazardous Air Pollutant (HAP).

Bruce Murray stated that the facility used to be subject to the National Emission Standards for Hazardous Air Pollutants for Surface Coating of Metal Furniture, however, one of the chemicals in the water-based paint was declassified as a HAP, therefore, the facility is no longer subject.

TOUR INFORMATION

EPA Tour of the Facility: Yes

Data Collected and Observations: EPA observed the ovens and washers using a forward-looking infrared camera (FLIR) with optical gas imaging capability.

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:

- SDS for all paint used at the facility (powder and dipped water-based)
- SDS for the welding wire
- SDS for the soap and any other product used in the wash tanks
- Annual emissions tracking spreadsheet (unlocked with formulas and assumptions) for 2021
- Confirmation of whether there are any controls for volatile organic compounds (VOC) at the facility
- Reported HAP usage at the facility has dropped significantly since 2015 – what is the reason for this change?

DIGITAL SIGNATURES

Report Author: KARINA KUC Digitally signed by KARINA KUC Date: 2022.09.30 12:00:13 -05'00'

Section Supervisor: Frank, Nathan Digitally signed by Frank, Nathan Date: 2022.10.03 09:39:46 -05'00'

APPENDICES AND ATTACHMENTS

Appendix A: Digital Video Log

Facility Name: Edsal Manufacturing Company, Inc.
Facility Location: 4400 S. Packers Avenue, Chicago, Illinois 60609
Date of Inspection: August 11, 2022

APPENDIX A: DIGITAL VIDEO LOG

1. **Inspector Name:** Victoria Nelson	2. **Archival Record Location:** Region 5 Electronic Record Center

Video Number	File Name	Date and Time (Central time)	Description of Video
1	MOV_0478.mp4	8/11/2022 10:16	FLIR video of oven for black powder paint
2	MOV_0479.mp4	8/11/2022 10:19	FLIR video of oven for black powder paint
3	MOV_0480.mp4	8/11/2022 10:25	FLIR video of oven for black dipped line
4	MOV_0481.mp4	8/11/2022 10:28	FLIR video of oven for post line, shows visible smoke
5	MOV_0482.mp4	8/11/2022 10:32	FLIR video of wash tank combined with heat dryer associated with the post, shelf and maxi line