



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

DATE: JUN 18 2019

SUBJECT: CLEAN AIR ACT INSPECTION REPORT
ChemDesign, Marinette, Wisconsin

FROM: Alexandra Letuchy, Environmental Engineer
AECAB (MI/WT)

THRU: Sarah Marshall, Section Chief
AECAB (MI/WT)

TO: File

BASIC INFORMATION

Facility Name: ChemDesign

Facility Location: 2 Stanton Street, Marinette, Wisconsin

Date of Inspection: April 30, 2019

EPA Inspector(s):

1. Alexandra Letuchy, Environmental Engineer
2. Albana Bega, Environmental Engineer

Other Attendees

1. David J. Mielke, President & CEO
2. Joel D. Salzman, Vice President of Operations
3. Tom Willis, Director of Health, Environmental, and Safety
4. Chris Karikula, RCRA

Contact Email Address: Tom Willis, twillis@chemdesign.com

Purpose of Inspection: Chemical manufacturing plant inspection

Facility Type: Chemical manufacturing plant

Regulations Central to Inspection: MACT Subpart VVVVVV (Subpart 6V)

Arrival Time: 2:15 PM

Departure Time: 5:30 PM

Inspection Type:

- ☒ Unannounced Inspection
- ☐ Announced Inspection

OPENING CONFERENCE

- ☒ Credentials Presented
- ☒ CBI warning to facility provided

The following information was obtained verbally from facility personnel unless otherwise noted.

Process Description:

ChemDesign operates a contract manufacturing chemical plant. Operations at the facility include charging chemicals, mixing, reacting, filtration, centrifugation, distillation, phase separation, and drying. The facility has 40 – 45 reactors that can be used in production. Emissions from the various operations are controlled by wet scrubbers.

Batch sheets are used for each process. Solvent tanks that range in size from 8,000 – 10,000 gallons contain isopropyl alcohol, methanol, toluene, isohexane, and chlorobenzene. Two tanks onsite contain hazardous waste.

The facility operates a process that uses a Subpart 6V chemical to produce a material described by North American Industry Classification System code 325. This process is described in the Confidential Business Information portion of this report.

The facility has a leak detection and repair program for the hazardous waste portion of the site but not for the process side. Pressure checks are conducted as part of batch set up.

Staff Interview: ChemDesign has not assessed whether the facility is subject to and complying with Subpart 6V.

TOUR INFORMATION

EPA toured the facility: Yes

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

Field Measurements: were not taken during this inspection.

RECORDS REVIEW

1. Diagram of process that uses a Subpart 6V chemical (copy obtained)

CLOSING CONFERENCE

Requested documents:

- Subpart 6V Summary of Applicability and Requirements
- Emission calculation for Subpart 6V chemical

Compliance Assistance: EPA discussed with ChemDesign personnel which portions of Subpart 6V may apply to the facility based on the process description.

Concerns: EPA expressed concern that the facility may not be currently complying with Subpart 6V.

SIGNATURES

Report Author: A. Sedykh Date: 6/18/19

Section Chief: Sam W. [Signature] Date: 6/18/19