



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

DATE: See Date of Section Chief Signature Below

SUBJECT: CLEAN AIR ACT INSPECTION REPORT
Centurion Container LLC, South Holland, IL

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

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

TO: File

BASIC INFORMATION

Facility Name: Centurion Container LLC

Facility Location: 15555 La Salle Street, South Holland, IL 60473

Date of Inspection: 9/10/21

EPA Inspector(s):

1. Sasha Letuchy, Environmental Engineer
2. Manoj Patel, Environmental Engineer

Other Attendees:

1. Michael A. Chorpash, President and CEO
2. Kay Robinson, Corporate Safety, Health, Environment & Quality (SHEQ) Director (via phone)
3. Tony Meadors, Plant Manager
4. Brandon Lucas, Corporate SHEQ Manager

Contact Email Address: kayr@c-containers.com

Purpose of Inspection: Clean Air Act Inspection

Facility Type: Industrial Bulk Container Reconditioner

Regulations Central to Inspection: SIP/Permit Compliance

Arrival Time: 9:15 am

Departure Time: 12:00 pm

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.
- Provided CBI warning to facility

The following information was obtained verbally from Michael A. Chorpash, Kay Robinson, Tony Meadors, and Brandon Lucas unless otherwise noted.

Company Ownership: The company was established in 2018

Process Description:

Centurion Container LLC (Centurion) is located at 15555 La Salle Street, South Holland, IL. The facility is an industrial bulk container recycler which processes two sizes of plastic totes (275 gal and 320 gal) and metal cages. The facility receives plastic bottles and cages from several industrial and commercial establishments. The bottles are supposed to be RCRA empty when they arrive on-site which means that should contain less than 1 inch of residue. Centurion requires that product labels are intact on the empty containers and requires that customers provide SDSs for the materials formerly contained in the totes. The company maintains records of the containers collected, which includes a description of the type of residue last in the container, if it was hazardous. Heavies are rejected based on a visual inspection and customers are required to arrange to pick them up.

cleans the bottles and cages in a series of washing and rinsing steps with pH adjusted hot water. The plastic bottle wash steps are:

- 1) Pre-flush (one station)
- 2) Wash (three stations)
- 3) Power wash (one station)
- 4) Fresh water rinser (one station)

There are four wash water tanks which are used to store and recycle wash water in the process. The fresh water tank (330 gallons) contains city water and feeds the rinser (step 4). The power washer tank (1500 gallons) receives used water exiting the fresh water rinser step (step 4) and

feeds the power washer (step 3). The wash heat tank receives used washer from power wash (step 3) and feeds the wands of the wash stations (step 2). Similarly, the pre flush heat tank receives washer the wash stations (step 2) and feeds the pre-flush (step 1). Wastewater from the pre-flush is collected in a tote and hauled offsite.

The plastic totes are washed for approximately 1.5 – 2 minutes at each station, except the fresh water rinse only takes 30 seconds. The maximum line speed is 30 – 40 bottles per hour.

Cage washing consists of a power washer. The power washer wands are also fed by the power washer tank used on the bottle line.

The facility operates Monday through Friday, 6:30 am – 3:00 pm. Approximately 500 – 600 totes are processed per day.

Emissions from the processes are not captured and are not controlled.

Staff Interview: The facility has not applied for a CAA permit from the Illinois Environmental Protection Agency (IEPA). A consultant is currently working on preparing an application, but nothing has yet been submitted. They haven't talk to anyone at IEPA.

Brandon Lucas stated that he was unaware of any air emissions testing or emissions estimates conducted for the facility, but that Kay would be the better person to ask. The facility has not been inspected by IEPA.

TOUR INFORMATION

EPA Tour of the Facility: Yes

Data Collected and Observations:

During the tour, cages were being processed on both the cage line and the container wash line.

Photos and/or Videos: were taken during the inspection.

CLOSING CONFERENCE

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

Concerns: EPA explained that it was concerned about the volatile organic compounds from the container wash line. It was concerned that the facility was not quantifying emissions from the wash line, that it had not conducted any emissions testing, and that it had not obtained a permit from IEPA.

DIGITAL SIGNATURES

Report Author: **ALEXANDR A LETUCHY** Digitally signed by
ALEXANDRA LETUCHY
Date: 2021.09.21
15:43:10 -05'00'

Section Chief: **SARAH MARSHALL** Digitally signed by
SARAH MARSHALL
Date: 2021.09.21
11:26:18 -05'00'

APPENDICES AND ATTACHMENTS

1. Appendix A Digital Image Log – CBI

Contains Items Claimed as CBI – Non-Releasable

Facility Name: Centurion Container LLC

Facility Location: 15555 LaSalle Street, South Holland IL 60473

Date of Inspection: September 10, 2021

APPENDIX A: DIGITAL IMAGE LOG - CBI

1. Inspector Name: Sasha Letuchy	2. Archival Record Location: C:\Users\aletuchy\OneDrive - Environmental Protection Agency (EPA)\Cases\Centurion\Photos - CBI
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Image Number	File Name	Date and Time (incl. Time zone and DST)	Latitude and Longitude	Description of Image
1	IMG_0001	2021:09:10 12:15:10		Cage Line
2	IMG_0002	2021:09:10 12:16:30		Wash Line
3	IMG_0003	2021:09:10 12:19:41		Fresh Wash Station
4	IMG_0004	2021:09:10 12:21:02		Power Wash Station
5	IMG_0005	2021:09:10 12:23:46		Wash Stations
6	IMG_0006	2021:09:10 12:24:06		Wash Station
7	IMG_0007	2021:09:10 12:24:57		Water Tank
8	IMG_0008	2021:09:10 12:25:15		Pre-flush Water Tank