



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

SUBJECT: CLEAN AIR ACT INSPECTION REPORT
Cedar Concepts, Chicago, Illinois

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

THRU: Nathan Frank, Section Supervisor
AECAB (IL/IN)

TO: File

BASIC INFORMATION

Facility Name: Cedar Concepts

Facility Location: 4342 S Wolcott Ave, Chicago, IL 60609

Date of Inspection: 7/6/2022

EPA Inspector(s):

1. Emma Leeds, Environmental Engineer
2. Jason Schenandoah, Environmental Engineer

Other Attendees:

1. Linda Boasmond, President – Cedar Concepts

Contact Email Address: purchasing@cedarconcepts.net

Purpose of Inspection: To investigate compliance with the Clean Air Act and the facility's Federally Enforceable State Operating Permit (FESOP)

Facility Type: Surfactant chemicals and personal care product manufacturing

Regulations Central to Inspection: FESOP I.D. No 031600FNM, specifically limits of 10 tons per year (tpy) for any single hazardous air pollutant (HAP), 25 tpy for any combination of HAPs, and 25 tpy for volatile organic material.

Arrival Time: 9:05 AM

Departure Time: 11:00 AM

Inspection Type:

- ☒ Unannounced Inspection
- ☐ Announced Inspection

OPENING CONFERENCE

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

The following information was obtained verbally from Linda Boasmond unless otherwise noted.

Process Description:

Cedar Concepts manufactures more than 300 separate products categorized into amphoteric, amides, esters, flaking products, fatty alcohol blends, amine oxides, and butanes. Raw materials, which are claimed as confidential business information (CBI) and included in paragraph one in the CBI section, are received by truck and stored in the main facility or the warehouse. Various reactions are used to create final products, including neutralization, condensation, blending, and flaking. Some products require only one reaction while others require a combination. Most reactions occur in reactor vessels, including neutralization and blending; however, some processes also require the use of condensers and flakers. The flakers receive liquid material from the condensers on a belt, where the liquid cools and immediately solidifies into small pieces. The small pieces are then dropped into sacs and drums.

The five condensers at the facility, each attached to an associated reactor, are used to both manufacture products and control air emissions. A baghouse is used to control emissions from the flakers.

Staff Interview: The facility operates with 36 employees for 24 hours a day, Monday through Friday. All materials are produced in batch processes.

The condensers are monitored for maximum temperature but not minimum temperature. Linda believed the lowest temperature the condensers ever reach is 41 degrees Fahrenheit. The baghouse is only used during specific batches where odor control is necessary.

At the time of the inspection, a new Cedar Concepts facility was being constructed at 4100 S Packers Avenue. This facility is planned to be smaller than the 4242 S Wolcott Ave facility, but will perform all the same processes, except for flaking. Linda believed that the general contractor for the new facility had submitted construction permit applications for the facility but was not sure.

The Plant Engineer is responsible for scheduling leak checks on the reactors, but the previous Plant Engineer stopped working at the facility about a month before the inspection. Leak checks are typically performed during the production of certain materials including alkanolamides and alkanolamines.

Cedar Concepts does not have a written dust control or particulate matter operating plan.

TOUR INFORMATION

EPA Tour of the Facility: Yes

Data Collected and Observations:

EPA toured the main production building of the facility as well as the storage warehouse. EPA noticed cracks in the ceiling of the main production building. Linda shared that some of the storage tanks are heated with steam, and the reactors use nitrogen blankets. EPA observed the baghouse, which uses tube filters and was not operational at the time of the inspection.

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

Field Measurements: were not taken during this inspection.

RECORDS REVIEW

EPA reviewed a recent maintenance work order form. Linda shared that a new maintenance paperwork program had just started that week. Copies of the work order form were not obtained.

CLOSING CONFERENCE

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

Requested documents:

- Any reports for air emission tests that have been performed at the facility, including the December 2, 2015 stack test
- Previous two Annual Air Emissions reports, and the supporting emission calculations (Excel spreadsheet format if possible)
- Safety Data Sheets for any materials used or produced at the facility containing chromium, lead, manganese, or nickel
- Hourly operation logs for each reactor for the past year
- Hourly operation logs for each condenser for the past year
- Monthly production rates of methyl esters, amides from methyl esters, low VOC amides, VOC related blends, and amino amines for the past year
- Monthly flake production rate for the past year

DIGITAL SIGNATURES

Report Author: **Leeds,
Emma**  Digitally signed by Leeds,
Emma
Date: 2022.08.09
09:48:44 -05'00'

Section Supervisor: **ETHAN CHATFIELD**  Digitally signed by
ETHAN CHATFIELD
Date: 2022.08.09
10:13:43 -05'00'
