



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

SUBJECT: CLEAN AIR ACT INSPECTION REPORT
Leggett & Platt, Inc., Aurora, Illinois

FROM: Liam Klaiman, Environmental Engineer
AECAB (IL/IN)

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

TO: File

BASIC INFORMATION

Facility Name: Leggett and Platt, Inc.

Facility Location: 969 Corporate Blvd, Aurora, IL, 60502

Date of Inspection: 09/19/2023

EPA Inspector(s):

1. Liam Klaiman, Environmental Engineer
2. Dakota Prentice, Environmental Engineer

Other Attendees:

1. Ernesto Ochoa, Branch Manager
2. Kim Dolder, Human Resources and Safety

Contact Email Address: ernesto.ochoa@leggett.com

Purpose of Inspection: Responding to odor complaint

Facility Type: Carpet Foam Manufacturer

Regulations Central to Inspection: 40 C.F.R. Part 63, Subpart OOOOOO; National Emission Standards for Hazardous Air Pollutants for Flexible Polyurethane Foam Production and Fabrication Area Sources (NESHAP OOOOOO)

Facility Name: Leggett and Platt
Facility Location: 969 Corporate Blvd, Aurora, IL, 60502
Date of Inspection: September 19, 2023

Arrival Time: 10:38 AM
Departure Time: 11:35 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.
- ☒ Provided CBI warning to facility

The following information was obtained verbally from Ernesto Ochoa and Kim Dolder unless otherwise noted.

Process Description:

Leggett & Platt manufactures carpet padding from scrap or recycled foam at the Aurora facility, making it subject to NESHAP OOOOOO as a rebond foam affected source. Production begins with the delivery of unused and used polyurethane foam from other industries and uses, including recycled carpet padding and mattress foam scrap. The foam is then put through one of two shredders, followed by one of the three grinders. One of the grinders is referred to as the “cumberland” grinder. This processed polyurethane foam is first stored in large storage bins, then moved to hoppers and weighed. The foam can then be put through the “Log and Peel” or “Extruded Bun” process, both of which require an adhesive resin.

The log and peel process uses only foam processed by the cumberland grinder. During the log process the mixture of foam and resin is placed in a cylindrical shaped mold and steamed in order to create a 1,000-pound log of foam. This is then dried and “peeled” into 20-to-30-yard rolls.

The extruded bun process uses the same foam and resin mixture, but it is placed into a rectangular prism and steamed. This steam is captured by a hood, which is documented in the attached Photo Log. This creates a 5,000-pound bun that is then moved through a horizontal slicer to create the 20-to-30-yard rolls. The final step in production includes the laminating of the rolls by placing a layer of plastic on the foam before shipping them out.

Staff Interview: The facility was built in 1982, but Legget and Platt didn’t move in until 2008. The facility currently employs 100 people, the work is split between two 10 hours shifts from 5am until 2am, 5 days a week. The facility has three grinders and two shredders, one of the three grinders is referred to as a cumberland grinder, there is one electric and one hydraulic shredder.

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The facility has the capacity to produce 4,000 rolls a day but is currently operating at 3,200. Each log is turned into 15 rolls, while each bun can be turned into 50-100 rolls.

Legget & Platt stated it does not use products containing methylene chloride anywhere in the process, in compliance with NESHAP OOOOOO requirements at 40 C.F.R. § 63.11416(d)(2).

TOUR INFORMATION

EPA Tour of the Facility: Yes

Data Collected and Observations:

The tour began at 11:11AM with the end of the process. Inspectors observed the laminating process, then walked to the electric shredder. The material moves directly from shredder, to grinder, then onto storage and hopper.

Inspectors observed the extruded bun process, where steam can be seen being collected by a hood. There is one baghouse to control dust. This unit vents back into the system to reuse the material.

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 the three chemicals used in the adhesive mixture
- All data Leggett and Platt reports submitted to Illinois EPA
- Any records maintained pursuant to current operating permits issued by Illinois EPA
- Chemical usage information for the past year

DIGITAL SIGNATURES

Report Author: Klaiman, Liam Digitally signed by Klaiman, Liam
Date: 2023.10.10
10:42:10 -05'00'

Section Supervisor: DAKOTA PRENTICE Digitally signed by DAKOTA PRENTICE
Date: 2023.10.10
10:47:55 -05'00'

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APPENDICES AND ATTACHMENTS

1. Confidential Business Information Attachment
2. Digital Image Log

Facility Name: Leggett and Platt

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CONFIDENTIAL BUSINESS INFORMATION ATTACHMENT

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Singular picture of the extruded bun process

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APPENDIX A: DIGITAL IMAGE LOG

1. Inspector Name: Liam Klaiman	2. Archival Record Location: AECAB Library > Enf_LeggetandPlat_IL_23 > Enf_LeggettandPlatt_IL_23_Inspection
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Image Number	File Name	Date and Time (incl. Time zone and DST)	Latitude and Longitude	Description of Image
1	P9190126.JPG	09/19/2023 11:22 CST		Steam coming off the extruded bun process