



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

DATE: *June 4, 2021*

SUBJECT: CLEAN AIR ACT INSPECTION REPORT
James Hardie Building Products, Inc., Peru, Illinois

FROM: Dakota Prentice, Environmental Engineer
AECAB (IL/IN)

THRU: Costantinos Loukeris, Acting Section Chief
AECAB (IL/IN)

TO: File

BASIC INFORMATION

Facility Name: James Hardie Building Products, Inc.

Facility Location: 17 Unytite Drive, Peru, Illinois

Date of Inspection: Opening Conference - April 27, 2021
Facility Tour - May 13, 2021
Closing Conference - May 13, 2021

EPA Inspectors¹:

1. Dakota Prentice, Environmental Engineer
2. Avery Bowers, Environmental Engineer
3. Brianna Fenzl, Environmental Engineer
4. Emma Leeds, Environmental Engineer

Other Attendees¹:

1. Jason Gahan, Plant Manager - James Hardie
2. JT Huey, Health and Safety Manager - James Hardie
3. Ryan Lampson, Environmental Health and Safety - James Hardie
4. Ryan Pugh, National Environmental Compliance Manager - James Hardie
5. Nick Tzourtzouklis, Environmental Director - James Hardie
6. Therese Dorigan – Burns McDonald

¹ Represents those people that attended either the opening conference and/or the facility tour and closing conference

Contact Email Address: Nick Tzourtzouklis - Nick.Tzourtzouklis@Jameshardie.com

Purpose of Inspection: Inspection to determine compliance with federally enforceable permits and applicable state and federal regulations.

Facility Type: Fiber Cement Board Manufacturing

Arrival Time: 10:30AM

Departure Time: 11:50AM

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: Not a small business
- Provided CBI warning to facility

The following information was obtained verbally from James Hardie representatives unless otherwise noted.

Process Description:

The facility manufactures concrete fiber board at what it describes as the “Sheet Plant” and the “Trim Plant”. Production at the Sheet Plant begins with preparation of certain raw materials at two ball mills and a mixer/digester. Raw material is then sent to one of two mixers that make up the mix plant. The mix plant produces a slurry that is piped to two tub machines. From the tub machines the sheets are imprinted with a pattern and cut to size. These “green sheets” are then loaded to autoclaves for curing under high pressure and temperature. Coating operations follow the autoclaves and include primer and final color coating application. Coated sheets are then sent to storage before shipment to customers. The overall process at the Trim Plant is similar to the Sheet Plant; however, the Trim Plant uses an extrusion process unit to create the trim product rather than a tub machine.

Staff Interview:

Emissions from the Sheet Plant autoclaves are controlled by a blowdown system. The blowdown system routes autoclave steam through a water tank, moving water-soluble organics to the water phase. Water from the blowdown tank is sent to the publicly owned treatment works

(POTW). The autoclaves at the Trim Plant are uncontrolled. Coating operations at the facility are not controlled; however, low volatile organic compound (VOC) coatings are reportedly used.

TOUR INFORMATION

EPA Tour of the Facility: Yes

Data Collected and Observations:

EPA walked the process for both the Sheet Plant and Trim Plant. At the Sheet Plant, the blowdown system was not in operation during the inspection due to an upset in the POTW system that caused damage to the blowdown tank.

Photos and Videos: were taken during the inspection.
See Appendix A

Field Measurements: were not taken during this inspection.

RECORDS REVIEW²

- Clean Air Act permits issued to the facility by Illinois EPA
- Process flow diagrams for the Sheet Line and Trim Line

CLOSING CONFERENCE

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

Requested documents:

- Performance test report for Blowdown System
- Trim Plant autoclave emissions estimates
- Title V permit application

EPA requested the above listed documents at the Opening Conference on April 27, 2021. James Hardie representatives have since provided all requested information.

² Provided by James Hardie representative prior to the Opening Conference

SIGNATURES

**DAKOTA
PRENTICE**

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DAKOTA PRENTICE
Date: 2021.06.04
12:19:56 -05'00'

Dakota Prentice
Report Author

**CONSTANTIN
OS LOUKERIS**

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Date: 2021.06.08 23:52:24
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Constantinos Loukeris
Acting Section Chief

Facility Name: James Hardie Building Products, Inc.
Facility Location: 17 Unytite Drive, Peru, Illinois
Date of Inspection: May 13, 2021

APPENDICES AND ATTACHMENTS

Appendix 1 – Digital Image Log
Appendix 2 – Digital Video Log

Facility Name: James Hardie Building Products, Inc.

Facility Location: 17 Unytite Drive, Peru, Illinois

Date of Inspection: May 13, 2021

APPENDIX A: DIGITAL IMAGE LOG

1. Inspector Name: B. Fenzl	2. Archival Record Location: R5 Electronic Record Center
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Image Number	File Name	Description of Image
1	IMG_1129.JPG	Sheet Plant Autoclave Pit
2	IMG_1130.JPG	Sheet Plant Autoclave Pit
3	IMG_1131.JPG	Accidental Photo
4	IMG_1132.JPG	Coating Line CP3 Dryer
5	IMG_1133.JPG	Blowdown System Tank
6	IMG_1134.JPG	Cooling Towers
7	IMG_1135.JPG	Ball Mill

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APPENDIX A: DIGITAL VIDEO LOG

1. Inspector Name: E. Leeds	2. Archival Record Location: R5 Electronic Record Center
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Video Number	File Name	Description of Image
1	MOV_2560.mp4	Sheet Plant Autoclave Pit
2	MOV_2561.mp4	Sheet Plant Autoclave Pit
3	MOV_2562.mp4	Coating Line CP3 Dryer
4	MOV_2563.mp4	Coating Line CP3 Dryer
5	MOV_2564.mp4	Blowdown System Tank
6	MOV_2565.mp4	Ball Mill