REGION 5
CHICAGO, IL 60604

MEMORANDUM

SUBJECT: CLEAN AIR ACT INSPECTION REPORT
North Coast Container d/b/a Chicago Steel Container LLC, Chicago, IL

FROM: Aileen Drum
AECAB (IL/IN)

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

TO: File

BASIC INFORMATION

Facility Name: North Coast Container d/b/a Chicago Steel Container LLC
Facility Location: 1846 S. Kilbourne Ave Chicago, IL 60623

Date of Inspection: July 24,2024

EPA Inspector(s):
1. Aileen Drum, Physical Scientist
2. Karina Kuc, Environmental Engineer

Other Attendees:
1. Ben Andrews, Plant Manager, North Coast Container
2. Luis Ramirez, Quality Assurance and Special Products Manager, North Coast Container

Contact Email Address: bandrews@northcoastcontainer.com, lramirez@northcoastcontainer.com

Purpose of Inspection: To follow up on citizen complaints

Facility Type: Steel Drum Manufacturer

Regulations Central to Inspection: The Illinois State Implementation Plan (SIP) and the conditions of the facility's Clean Air Act Permit Program (CAAPP) Permit number 95120229

Arrival Time: 10:10 AM

Facility Name: North Coast Container
Facility Location: 1846 S. Kilbourn Ave Chicago, IL 60623
Date of Inspection: July 24, 2024

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: *Provided via email post-inspection*
☒ Provided CBI warning to facility

The following information was obtained verbally from Ben Andrews and Luis Ramirez unless otherwise noted.

Company Ownership: In 2022 Chicago Steel Container Corp was purchased by North Coast Container. The facility now uses the name Chicago Steel Container LLC.

Process Description:
North Coast Container, doing business as Chicago Steel Container LLC, manufactures steel drums. Steel coils are received, cut into 72 inch sheets, and rolled into cylinders. The seams are electrically welded together to form drums and several hoops are pressed into the shape to fortify the structure. Once formed the drums moves to a washer where soap is applied to remove oil and particulate, and phosphoric acid is applied to etch the steel to prevent corrosion and to help the paint adhere. The drums are then dried and sent on one of two routes, depending on whether the final product will be sent out uncoated or have a phenolic liner applied as an interior coating.

Drums without an interior coating are sent straight to the seamer where the tops and bottoms are affixed, moved to a spray booth where the exterior is painted, and then sent to a final oven to cure. Drums that do receive an interior coating have a phenolic liner applied in a spray booth after exiting the dryer. Following the interior coating the components move to the main oven to cure and are then sent to the seamer where the tops and bottoms are affixed to the drum. Once assembled the exterior spray is applied and the drums are sent to the final oven to cure. The final products are moved to a loading dock and shipped to customers.

Staff Interview: The facility employs approximately 55 employees and operates from 6 AM to 3:30 PM Monday through Friday, occasionally operating for additional hours on Saturday. Three spray booths are used in the process: one for the interior coating, one for the exterior coating, and one for coating parts (tops and bottoms). The spray booths are controlled by filters. Each booth has two sets of filters to control particulate, one of which is changed daily and one of which is changed weekly. Low VOM containing paints are used to comply with VOC limits. Three ovens are also used in the process: the main oven, the finishing oven, and a box batch oven. The box batch oven is used to cure agitators that

are placed into some of the drums, but the facility rarely uses this oven, as they prefer to buy this part already finished. All three ovens run at approximately 435 degrees Fahrenheit. Additional process equipment includes a sheet grinder and a gluing line. The sheet grinder is used to grind burs from the edges of steel sheets after they are cut to length and is controlled by a dust collector. The gluing line affixes gaskets to the drum cover.

Water from the washer is sent out every two weeks untreated. The washer, ovens, and spray booths are routed to stacks that exhaust to the atmosphere. The dust collector does not vent outside. Method 22 is performed semiannually to monitor opacity.

TOUR INFORMATION

EPA Toured the Facility: Yes

Data Collected and Observations:
EPA walked the production line from where raw materials are received to where final products depart. Pressure drop readings for the interior coating, parts coating, and exterior coating spray booths were recorded at 0.45 inches water column (in WC), 0.11 in WC, and 4.5 in WC respectively. The facility's CAAPP Permit number 95120229 states, "pursuant to 35 IAC 218.219(b) (1) through (6), the Permittee of a coating line described in 35 IAC 218.204(q), shall ensure that mixing and storage containers used for VOM-containing coatings, thinners, coating-related waste materials, and cleaning materials are kept closed at all times except when depositing or removing these materials". Several open containers containing coating were observed throughout the tour, documented in photos 1 and 2. The facility's permit also states, "pursuant to 35 IAC 212.123(a), the Permittee shall not cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30 percent, into the atmosphere from any emission unit specified in Condition 4.1.1, except as allowed by 35 IAC 212.123(b) and 212.124". EPA observed visual emissions leaving two stacks atop the building but did not perform a Method 9 analysis.

Photos and/or Videos: were taken during the inspection and are listed in Appendix A.

Field Measurements: were not taken during this inspection.

CLOSING CONFERENCE

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

Requested documents:

- Access to the Continuous Emissions Monitoring database files which hold SDSs, Emissions calculations, and coating/solvent usage
- Records of the last 3 years of visual emissions observations conducted at the facility to monitor opacity
- A copy of the most recent permit

Facility Name: North Coast Container
Facility Location: 1846 S. Kilbourn Ave Chicago, IL 60623
Date of Inspection: July 24, 2024

Concerns: EPA noted that to comply with the conditions of the facility's permit all containers containing coating should be kept closed at all times except when depositing or removing these materials.

DIGITAL SIGNATURES

Report Author: AILEEN DRUM Digitally signed by AILEEN DRUM Date: 2024.07.30 15:26:42 -05'00'

Section Supervisor: NATHAN FRANK Digitally signed by NATHAN FRANK Date: 2024.08.02 16:32:06 -05'00'

APPENDICES

1. Appendix A: Digital Image Log and Digital Video Log

APPENDIX A: DIGITAL IMAGE LOG AND DIGITAL VIDEO LOG

Inspector Name: Karina Kuc **Archival Record Location:** AECAB Library > Enf_NorthCoastContainer_IL_24 > Inspection

Image Number	File Name	Date and Time (CDT)	Description of Image
1	IMG_0626.JPG	7/24/24 11:32 AM	Uncovered paint buckets by the interior coating spray booth
2	IMG_0627.JPG	7/24/24 11:41 AM	Uncovered paint buckets by the manometer for the special parts spray booth