



REGION 5

CHICAGO, IL 60604

MEMORANDUM

SUBJECT: CLEAN AIR ACT INSPECTION REPORT
Highway Transport, Channahon, Illinois

FROM: Erin DuMontelle, Environmental Engineer
AECAB (MI/WI)

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

TO: File

BASIC INFORMATION

Facility Name: Highway Transport

Facility Location: 3801 Youngs Road, Channahon, Illinois 60410

Date of Inspection: November 2, 2023

EPA Inspector(s):

1. Erin DuMontelle, Environmental Engineer
2. Sasha Letuchy, Environmental Engineer

Other Attendees:

1. Robert Morrey, Service Center Manager
2. Travis O'Banion, Managing Director of Environmental Health and Sustainability - phone
3. Kevin Hales, Wastewater Operator 2
4. Luis Marin, Lead Supervisor

Contact Email Address: Rober Morrey – rmorrey@highwaytransport.com

Purpose of Inspection: Determine compliance with the Clean Air Act and the Illinois State Implementation Plan (SIP) requirements related to VOCs for tank and truck washing facilities

Facility Type: Truck washing and transportation company

Regulations Central to Inspection: the Clean Air Act (CAA) and the Illinois SIP

Arrival Time: 1:26 PM CDT

Departure Time: 3:00 PM CDT

Inspection Type:

- ☒ Unannounced Inspection
- ☐ Announced Inspection

OPENING CONFERENCE

- ☒ Presented Credentials
- ☒ Stated authority and purpose of inspection
- ☒ Provided Small Business Resource Information Sheet emailed with Inspection Report
- ☒ Provided CBI warning to facility

The following information was obtained verbally from Highway Transport representatives unless otherwise noted.

Company Ownership: Highway Transport has been the sole owner and operator of the facility since it opened in June 2022.

Process Description:

Highway Transport (the facility) is a tank washing facility that cleans truck trailers. The truck trailers are brought and staged onsite; all trailers are logged into the facility's system. If trailers come in with too much of a heel – the residual product remaining in the truck after unloading, they may be returned to the customer. The facility may also accept loaded tanks to be stored onsite for a minimal amount of time. Highway Transport has a planner that puts together a desired wash list of which trailers to clean; the cleaning schedule are determined by the previous contents. The trailer that needs to be cleaned is pulled from the yard and placed into one of three bays. The cleaning will follow the standard process of 1. draining the heel, 2. rinsing it out first with cold water and then a possible second rinsing with hot water, 3. washing the tank with a hot water solution that will break down any residue, 4. a final rinse, and 5. drying out the tank. Once clean, the trailers are brought back to the yard for staging before the carrier picks it up. The facility also has a small portion of loaded trailers onsite that are stored for a short period of time before the carrier picks it up for transport.

Staff Interview:

There are 17 employees, and the facility is open for cleaning from 6:00 AM to 6:30 PM, Monday through Friday. The facility has the ability to run partial operations on weekends. There is a maintenance shop onsite that is able to complete small repairs.

All trailers onsite are owned by Highway Transport. The facility is not a full-service facility; they do not provide storage or cleaning services to outside customers. The washes that the facility can complete are hot water, caustic, detergent, latex, and solvent washes. The hot water is kept at a temperature between 180° F and 200° F.

During the cleaning process, the first rinse is a cold wash. The final wash can be either hot or cold. All rinse water is collected into one of three storage tanks to be pretreated onsite before being pushed to

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the city sewer. A percentage of the final rinse water is recycled post pretreatment to supplement into the next first rinse.

Bay #3 is set up to only take trailers that previously contained latex-based products and solvent washing. Highway Transport has a knockout drum installed in Bay #3 that is used to collect the emissions during the solvent wash that uses MEA. At the time of the inspection, solvent washing was not a common type of wash completed onsite, but there are plans to increase the number of trailers that require it.

The company has multiple facilities across the United States. There are other facilities with emission controls such as a scrubber or thermal oxidizer.

TOUR INFORMATION

EPA Tour of the Facility: Yes

Data Collected and Observations:

Trailers in the yard are sorted and staged as clean, dirty, and loaded. The heels that are removed before cleaning are divided by type for RCRA removal and stored at the edge of Bay #3. There are exhaust vents above the trailers and on the side of the building that exhaust directly outside.

Photos and/or Videos: were taken during the inspection.
Photos were taken using a Canon 360HS digital camera.

Field Measurements: were not taken during this inspection.

CLOSING CONFERENCE

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

Requested documents:

1. The ROSS Permit Application for the facility and approval from IEPA,
2. The wash list for all trailers that have been washed since January 1, 2023, including the last contained products,
3. An excel spreadsheet of the Approved List for this facility,
4. The stack tests that were performed at the Louisiana facility for their thermal oxidizer,
5. The SDS for the MEA that is used for the solvent wash,
6. Last wastewater sampling information submitted to Joliet, and
7. The annual emission calculations for the facility from 2022.

Concerns: VOC emissions from truck washing are not being controlled.

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DIGITAL SIGNATURES

 Digitally signed by
ERIN DUMONTELLE
Date: 2023.11.29
10:28:29 -06'00'

Report Author: _____

 Digitally signed by
SARAH MARSHALL
Date: 2023.11.30
14:32:23 -06'00'

Section Supervisor: _____

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APPENDICES AND ATTACHMENTS

1. Appendix A: Digital Image Log

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APPENDIX A: DIGITAL IMAGE LOG

1. Inspector Name: Sasha Letuchy	2. Archival Record Location: Region 5 Electronic Record Center
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Image Number	File Name	Date and Time (CDT)	Description of Image
1	IMG_0486.JPG	11/02/2023 2:24 PM	Roof Vents between Bay 2 and Bay 3
2	IMG_0487.JPG	11/02/2023 2:24 PM	Duplicate of IMG_0486.JPG
3	IMG_0488.JPG	11/02/2023 2:24 PM	Wall vent by Bay 3
4	IMG_0489.JPG	11/02/2023 2:24 PM	Duplicate of IMG_0488.JPG