



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

DATE: *August 19, 2021*

SUBJECT: CLEAN AIR ACT INSPECTION REPORT
GCP Applied Technologies, Bedford Park, IL

FROM: Brittany Cobb, Environmental Engineer
AECAB (MI/WI)

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

TO: File

BASIC INFORMATION

Facility Name: GCP Applied Technologies

Facility Location: 6051 W 65th St., Bedford Park, IL 60638

Date of Inspection: 6/28/2021

EPA Inspector(s):

1. Alexandra (Sasha) Letuchy, Environmental Engineer
2. Brittany Cobb, Environmental Engineer

Other Attendees:

1. Mike Phillips – Plant Manager, GCP Applied Technologies
2. Brian O’Connell – Senior Environmental Manager, GCP Applied Technologies
3. Darin Clark – Regional Safety Manager, GCP Applied Technologies
4. Bill Sigel – Production Manager, GCP Applied Technologies

Contact Email Address: Michael.Phillips@gcpat.com, Brian.E.OConnell@gcpat.com,
Darin.Clark@gcpat.com

Purpose of Inspection: To determine Clean Air Act (CAA) Compliance.

Facility Type: Manufacturer of Construction Materials.

Regulations Central to Inspection: 40 CFR 60 Subparts A and De – NSPS for Small Industrial Commercial Institutional Steam Generating Units. 40 CFR 60 Subpart Kb – NSPS for Volatile Organic Liquid Storage Vessels with a capacity greater than or equal to 75 cubic meters used to store volatile organic liquids

Arrival Time: 10:40AM

Departure Time: 1:20PM

Inspection Type:

- ☒ Unannounced Inspection
- ☐ Announced Inspection

OPENING CONFERENCE

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

The following information was obtained verbally from Mike Phillips or Brian O’Connell unless otherwise noted.

Company Ownership: The facility changed ownership in 2016 to GCP Applied Technologies. The facility was previously owned by WR Grace for approximately 50 years.

Process Description:

GCP Applied Technologies makes general construction materials. They have two segments of their facility: water proofing and specialty construction. Some of their products include roofing underlayment, De Neef injection grouts, and concrete mixtures. The raw products are asphalt, rubber, propylene, glycol, and node oil.

There are 15 buildings and eight production lines. The Rubberized Asphalt Line includes: two mixers, rubber cyclones controlled by a baghouse and six storage/process tanks for rubberized asphalt, process oil and asphalt. Rubber is brought into the facility in 50 lb bags and is ground into smaller pieces. Multiple cyclones are used to recover material from the grinding process. The process oil is pumped directly out of trucks without a vapor balance performed. The rubber, oil, and asphalt are combined in the two mixers and then the rubberized asphalt is rolled, cooled, and dried at 300 degrees F. The pollution controls on this line consist of one baghouse for the rubber grinder to control dust. The baghouse exhausts outdoors.

The next production line is Line 4 for solvent cleaning and laminating. The third line is the Liquid Water Proofing Membrane Production Line, which includes one solid handling mixer controlled by a dust collector, another mixer and two storage tanks for process oil and asphalt.

Next there is the Concrete and Masonry Products Production Line, which includes two concrete product mixers, seven Masonry Product mixers and eight storage tanks. The Perm-A-Barrier Production Line includes one mixer. The Urethane Products Production Line includes two reactors. The Catalyst Blending Process Line also includes two mixers. The final line is the Liquid Membrane Activator Production Line, which also includes one mixer. Additionally, there are two natural gas-fired boilers which are less than 10,000,000 BTU.

Staff Interview: There are 36 employees, 10 of them are in management. Line 4 operates 7am – 5pm, Monday – Friday, and the rest of the production lines run 7am-3:30pm, Monday – Friday. There is small second shift for the Concrete and Masonry Products Production Line (3pm – 11pm).

GCP Applied Technologies previously had a ROSS permit and a FESOP. This facility was able to opt out of the FESOP when they got rid of certain processes. At a later point, they applied for a lifetime operating permit because of an increase in production, specifically in line 4, meant that they no longer qualified for the ROSS permit.

TOUR INFORMATION

EPA Tour of the Facility: Yes

Data Collected and Observations:

Mike Phillips led the inspectors on a tour of the production lines and baghouse. There was a vent over the rubberized asphalt line, in which the outlet could not be accounted for. The inspectors observed excess white dust on and underneath the baghouse. The inspectors did not see the cyclones. The rubber grinder and associated baghouse were not operating during the inspection and the Magnehelic showed < 0” W.C.

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

Field Measurements: were not taken during this inspection.

RECORDS REVIEW

1. Lifetime Operating Permit

CLOSING CONFERENCE

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

Requested documents:

1. Lifetime Operating Permit
2. Annual emissions reports for 2017 – present
3. Baghouse
 - a. Maintenance records for 2017 – present

- b. Inspection reports of for 2017 – present
- 4. Condensers
 - a. Maintenance records for 2017 – present
 - b. Inspection reports for 2017 – present
- 5. Information on where the exhaust from the rubberized asphalt line goes

Concerns: The inspectors were concerned that there was excess dust on and around the baghouses.

SIGNATURES

**X Cobb,
Brittany** Digitally signed by Cobb,
Brittany
Date: 2021.08.19
14:53:26 -05'00'

Brittany Cobb
Environmental Engineer

**X SARAH
MARSHALL** Digitally signed by
SARAH MARSHALL
Date: 2021.08.23
07:13:02 -05'00'

Sarah Marshall
Section Chief

Facility Name: GCP Applied Technologies

Facility Location: 6051 W 65th St., Bedford Park, IL 60638

Date of Inspection: June 28, 2021

APPENDICES AND ATTACHMENTS

1. Digital Image Log

Facility Name: GCP Applied Technologies
Facility Location: 6051 W 65th St., Bedford Park, IL 60638
Date of Inspection: June 28, 2021

APPENDIX A: DIGITAL IMAGE LOG

1. Inspector Name: Brittany Cobb	2. Archival Record Location: https://usepa.sharepoint.com/:f:/r/sites/R5_Work/r5erc/ecad/AECAB%20Library/Enf_GCP Applied Technologies IL 21
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Image Number	File Name	Date and Time (incl. Time zone and DST)	Description of Image
1	Photo 1.jpg	06/28/21, 12:00 CST	Site Map
2	Photo 2.jpg	06/28/21, 12:06 CST	Baghouse with white dust
3	Photo 3.jpg	06/28/21, 12:06 CST	Baghouse
4	Photo 4.jpg	06/28/21, 12:07 CST	Full view of Baghouse
5	Photo 5.jpg	06/28/21, 12:07 CST	Side view of baghouse
6	Photo 6.jpg	06/28/21, 12:07 CST	Close up of baghouse ID number – DC-140-010
7	Photo 7.jpg	06/28/21, 12:08 CST	Baghouse with white dust
8	Photo 8.jpg	06/28/21, 12:14 CST	Air outlet on baghouse
9	Photo 9.jpg	06/28/21, 12:14 CST	Close up of roof
10	Photo 10.jpg	06/28/21, 12:16 CST	Rubberized asphalt mixing tank (M-11)