



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

**SUBJECT:** CLEAN AIR ACT INSPECTION REPORT  
Quala Services, LLC, Chicago, IL

**FROM:** Veronica Fischer, Environmental Engineer  
AECAB (MI/WI)

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

**TO:** File

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**BASIC INFORMATION**

**Facility Name:** Quala Services, LLC

**Facility Location:** 803 E 120th Street, Chicago, IL 60628

**Date of Inspection:** August 10, 2021

**EPA Inspector(s):**

1. Veronica Fischer, Environmental Engineer
2. Victoria Nelson, Environmental Engineer
3. Alexandra Letuchy, Environmental Engineer
4. Brittany Cobb, Environmental Engineer

**Other Attendees:**

1. Gus Rios, Facility Manager
2. Carlos Rodriguez, Operations Manager

**Contact Email Address:** [grios@quala.us.com](mailto:grios@quala.us.com)

**Purpose of Inspection:** Inspection of tanker and tote washing operations

**Facility Type:** Container washing operation

**Regulations Central to Inspection:** Illinois SIP, Permit

**Arrival Time:** 2:00 p.m. CST  
**Departure Time:** 3:55 p.m. CST

**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 Gus Rios unless otherwise noted.

**Process Description:**

Quala Services operates a container cleaning facility that processes containers with various residual liquids and dry bulk. All containers received are RCRA empty and Quala Services will not accept any containers that are over the RCRA empty threshold.

Mr. Rios estimated that approximately 40% of the containers processed are intermediate bulk containers, also referred to as totes, while the remaining containers that are processed are tankers. The totes processed are typically 275 gallons and contain residual inks, resins, paints, or varnishes. Approximately 70% of the tankers that are processed contain residual petroleum products, solvents, resins, or detergents, and 30% contain residual food grade material such as liquid or dry sugar, vegetable oil, or alcoholic beverages. The largest empty tanker that gets processed is 7,000 gallons.

**TOUR INFORMATION**

**EPA Tour of the Facility:** Yes

**Data Collected and Observations:**

Tanker wash bays 1 through 4 are used to process tankers containing residual light oils, moderate oils, solvents, detergents, and water solubles. The four bays are connected to a trench that collects the water used during washing and steaming for recirculation. The wash process starts by using high pressure steam for pre-cleaning of the tanker, followed by the addition of powdered detergent. After the detergent is added, the tanker is rinsed using three 30 second rinses of either hot or cold water, depending on the residual material. A 1.5-inch hose is put into the 22-inch manway on the tanker to perform the rinse. Tanker wash bays 7 and 8 use sodium

hydroxide for heavy washes of tankers with residual varnishes and paints. Heavy washes use hot water at 180 °F.

The tote washing building has two wash bays, each with six washing stations. The tote washes are heavy washes of residual inks, paints, and varnishes. Each wash starts with a hot water rinse using clean water that is not recirculated. Following the hot water rinse, the totes are typically washed for 20 minutes, although some may require a longer wash cycle. The water used for the 20-minute wash cycles is recirculated separately at each wash station.

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

**Field Measurements:** were not taken during this inspection.

### **RECORDS REVIEW**

1. 2001 Lifetime Operating Permit
2. ROSS permit

### **CLOSING CONFERENCE**

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

### **Requested documents:**

- 2020 daily residuals log
- SDS that corresponds to each product cleaned
- Corporate emissions testing records

**Compliance Assistance:** EPA inspectors suggested the use of a dust suppressant for dust seen in the parking lot.

### **Concerns:**

EPA discussed the following concerns with facility personnel.

- Dust in the air from trucks in the parking lot
- Use of the AP-42 emission factor for emissions calculations may underestimate the actual emissions from washing operations

### **DIGITAL SIGNATURES**

Report Author: **Veronica Fischer**  
Veronica Fischer  
Environmental Engineer

Digitally signed by  
Veronica Fischer  
Date: 2021.10.12  
12:22:11 -05'00'

Section Chief: SARAH  
MARSHALL

Digitally signed by  
SARAH MARSHALL  
Date: 2021.10.12  
11:55:10 -05'00'

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Sarah Marshall  
Section Chief

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**APPENDICES AND ATTACHMENTS**

1. Appendix A – Digital Image Log

**Facility Name:** Quala Services, LLC

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**APPENDIX A: DIGITAL IMAGE LOG**

<b>1. Inspector Name:</b> Brittany Cobb	<b>2. Archival Record Location:</b> <i>C:\Environmental Protection Agency (EPA)\Cobb, Brittany - Quala Photos</i>
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<b>Image Number</b>	<b>File Name</b>	<b>Date and Time (incl. Time zone and DST)</b>	<b>Latitude and Longitude</b>	<b>Description of Image</b>
1	IMG_0478	8/10/21 3:17 PM		Tanker wash bays 1 through 4
2	IMG_0479	8/10/21 3:19 PM		Tanker wash bays 1 through 4
3	IMG_0480	8/10/21 3:22 PM		Exhaust vent in tanker wash bay
4	IMG_0481	8/10/21 3:34 PM		Wash stations in tote cleaning building
5	IMG_0482	8/10/21 3:42 PM		Exhaust fan in tote cleaning building