



REGION 5

CHICAGO, IL 60604

MEMORANDUM

SUBJECT: CLEAN AIR ACT INSPECTION REPORT
National Container Services (Mauser Packaging Solutions), Chicago, IL

FROM: Giles Chickering, Physical Scientist
AECAB (MI/WI)

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

TO: File

BASIC INFORMATION

Facility Name: National Container Services

Facility Location: 3620 West 38th Street, Chicago, Illinois 60632

Date of Inspection: November 5, 2024

EPA Inspector(s):

1. Giles Chickering, Physical Scientist
2. Sasha Letuchy, Environmental Engineer

Other Attendees:

1. Jason Shoff, Regional VP of Operations, Mauser

Contact Email Address: jason.shoff@mauserpackaging.com

Purpose of Inspection: To oversee a stack test at the drum/tank washing facility required by EPA via a Section 114 Information Request issued on March 28, 2022.

Facility Type: Drum/tank washing facility

Regulations Central to Inspection: Illinois State Implementation Plan

Facility Name: National Container Services
Facility Location: 3620 West 38th Street, Chicago, Illinois 60632
Date of Inspection: November 5, 2024

Arrival Time: 10:00 AM CST

Departure Time: 4:00 PM CST

Inspection Type:

- ☐ Unannounced Inspection
- ☒ Announced Inspection

OPENING CONFERENCE

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

The following information was obtained verbally from facility personnel unless otherwise noted.

Process Description:

Portions of the process description were obtained from December 7, 2024 inspection report summarizing EPA's October 19, 2021 inspection at the facility.

National is an industrial bulk container recycler. There are two process lines; the first is for poly drums (55 gallons, 30 gallons, or 15 gallons) and another for plastic Industrial Bulk Containers (IBC) (275 gallons and 330 gallons). The larger container line was completed in July 2024, replacing an older system for washing larger containers. The facility receives poly drums and IBC in cages from several industrial and commercial establishments. National only accepts RCRA empty poly drums and containers that meet the facility's container acceptance guidelines.

The poly drums' washing steps are as follows:

- 1) Pre-flush with cold water (Station#1)
- 2) External washing/delabeling (Station #2)
- 3) Internal washing with warm water (Station #3)
- 4) Vacuuming for water removal/drying
- 5) Drums Inspection Station - Air leak testing if passed/ground and recycled if failed

The IBC (275 and 330 gallons) washing steps are as follows:

- 1) Pre-flush with cold water
- 2) External washing
- 3) Hot water interior wash
- 4) Vacuuming for water removal/drying
- 5) Pressure testing for leaks

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The facility can process approximately 1,000 drums per day and about 20 totes per hour.

The facility also power washes the cages in which the IBCs and poly drums are delivered in. Stained or broken tote containers are removed and broken down using a partially automated process called an automated destruction line that prepares the plastic to be recycled. Everything that goes through a grinder for recycling has been washed.

Emissions from the processes are not captured and are not controlled. Wastewater is partially treated for pH, oil/water separation, and acid cracking.

Staff Interview:

During the stack test on November 5, 2024, EPA observed the tote line operation. The first test run started at 2:45 PM CST. The poly drum line test took place on November 7, 2024.

The facility staff notified EPA about an auxiliary hot water heater that was not used during the test runs and the potential impacts this could have for setting the baseline for their operations.

TOUR INFORMATION

EPA Toured the Facility: Yes

Data Collected and Observations:

Bungs are removed by a technician in open air on the exterior loading dock of the facility before they are fed onto the conveyor to enter the first pre-flushing step of washing. EPA discussed with TRC how this could be considered an emission outside of the enclosure.

Totes washed during run 1 stored materials including formic acid (90%), acetic acid (90%), Diethylamino ethanol, Versenex 80, Bardac 114, and Barquat 1552.

During the first run, the hot water tanks feeding the tote line were at 68°C (Heat Tank 1) and 86°C (Heat Tank 2).

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

Field Measurements: were not taken during this inspection.

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CLOSING CONFERENCE

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

DIGITAL SIGNATURES

Report Author: **GILES
CHICKERING** Digitally signed by GILES
CHICKERING
Date: 2024.12.13 08:55:33
-06'00'

Section Supervisor: **SARAH
MARSHALL** Digitally signed by
SARAH MARSHALL
Date: 2024.12.13
11:10:51 -06'00'

APPENDICES

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

Facility Name: National Container Services
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APPENDIX A: DIGITAL IMAGE LOG AND DIGITAL VIDEO LOG

Inspector Name: Sasha Letuchy (Flir)
[LLC IL 22 Stack Test 2024](#)

Archival Record Location: [Enf National Container Group](#)

Image Number	File Name	Date and Time (incl. Time zone and DST)	Description of Image
1	DC_3493.jpg	3:39 PM CST	TRC Exhaust fan
2	DC_3494.jpg	3:39 PM CST	CBI** Tote Wash Line
3	DC_3495.jpg	3:39 PM CST	CBI** Tote Wash Line