



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

DATE: See date of Section Chief signature

SUBJECT: CLEAN AIR ACT INSPECTION REPORT
Italmatch SC, Bedford Park, IL

FROM: Daniel Heins, Environmental Scientist
AECAB (IL/IN)

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

TO: File

BASIC INFORMATION

Facility Name: Italmatch SC, LLC

Facility Location: 7201 W 65th St, Bedford Park, IL 60638

Date of Inspection: July 14, 2021

EPA Inspector(s):

1. Daniel Heins, Environmental Scientist
2. Brianna Fenzl, Environmental Engineer

Other Attendees:

1. Meagan Albon, EHS Specialist – Italmatch SC

Contact Email Address: m.albon@italmatch.com

Purpose of Inspection: Compliance with Clean Air Act and permit requirements

Facility Type: Metalworking lubricants and additives manufacturer

Arrival Time: 14:00

Departure Time: 15:20

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. Reason: Not a small business
- Provided CBI warning to facility

The following information was obtained verbally from Meagan Albon.

Company Ownership: This facility was previously owned by Afton Chemical. Under both Afton and Italmatch, the facility has been producing products under the Polartech line.

Process Description:

Italmatch SC (or “the Facility”) produces metalworking lubricants and additives in a batch process. Raw materials (both liquid and solid) arrive on site via drums, totes, and tanker trucks. There are 10 bulk liquid storage tanks on site that vent to atmosphere. There are approximately 15 reactors on site of variable size, up to 40,000 kilogram capacity. Products are sent off site in bulk or packaged into drums, totes, and pales. All of the reactors can be vented to one of two scrubbers, a thermal oxidizer (TO), or directly to the atmosphere. Both the TO and the scrubbers are used to control volatile organic compounds (VOC). Scrubber flow rates in gallons per minute and TO temperature are recorded on circle charts. The charts from each day are paired with log sheets documenting the batch information, including product and hours of runtime.

Staff Interview:

The Facility prefers to route emissions to the scrubbers due to cheaper operating costs, however some products (oxidized batches) must always have their emissions routed to the TO. The TO is turned on ahead of running batches that need it. The Facility described the TO as “fairly old” with occasional operational issues, and it was shut down for maintenance last year. No batches requiring the TO were run during this time. The TO takes 4 to 5 hours to start up. The TO sometimes will turn off during power surges, forcing a re-start. The damper controlling emissions venting to the TO will only be opened if the TO is at or above 1420 degrees Fahrenheit. The TO is inspected and maintained by a third-party contractor. The reactors are cleaned with water or caustic.

TOUR INFORMATION

EPA Tour of the Facility: Yes

Data Collected and Observations:

EPA walked by the storage tanks, reactors, and control devices. No controls were operating at the time of the inspection.

Photos and/or Videos: were not taken during the inspection.

Field Measurements: were not taken during this inspection.

RECORDS REVIEW

Copies only taken if indicated:

- Sample TO batch and temperature log sheets
- Sample scrubber batch and temperature log sheets
- 2011 Lifetime Operating Permit
- Operating hour log spreadsheet
- Emissions calculations spreadsheet
- Storage tank capacity chart (copy taken)

CLOSING CONFERENCE

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

Requested documents:

- 2020 Emissions Report
- Permit Application
- TO maintenance record
- Monthly batch hours log spreadsheet
- Emissions calculation spreadsheet
- 2009 stack information document

DIGITAL SIGNATURES

Report Author: **DANIEL HEINS**  Digitally signed by DANIEL HEINS
Date: 2021.09.17 16:52:34 -05'00'

Section Chief: **NATHAN FRANK**  Digitally signed by NATHAN FRANK
Date: 2021.09.21 08:19:09 -05'00'