



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

DATE: MAR 22 2019
SUBJECT: CLEAN AIR ACT INSPECTION REPORT
ITW Specialty Films
FROM: Gregory Gehrig, Environmental Engineer
AECAB (MI/WI)
THRU: Sarah Marshall, Section Chief
AECAB (MI/WI)
TO: File

BASIC INFORMATION

Facility Name: ITW Specialty Films

Facility Location: 500 State Street, Chicago Heights, IL

Date of Inspection: March 15, 2019

EPA Inspectors:

1. Gregory Gehrig, Environmental Engineer
2. Eleanor Kane, Environmental Engineer

Other Attendees:

1. Paul Gniadek, Facilities Engineering Manager, ITW Specialty Films

Contact Email Address: paul.gniadek@itwsf.com

Purpose of Inspection: CAA Compliance

Facility Type: Web coating

Regulations Central to Inspection: SIP, NSPS and MACT

Arrival Time: 1245 hrs

Departure Time: 1445 hrs

Facility Name: ITW Specialty Films
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Date of Inspection: March 15, 2019

Inspection Type:

- ☒ Unannounced Inspection
- ☐ Announced Inspection

OPENING CONFERENCE

- ☒ Credentials Presented
- ☒ CBI warning to facility provided

The following information was obtained verbally from facility personnel. Company ownership information was also obtained from the company website.

Company Ownership: ITW Specialty Films division is part of the Specialty Products segment of Illinois Tool Works Inc., a Fortune 200 global manufacturing company headquartered in Glenview, IL. ITW Specialty Films is comprised of ITW Brand Identity (including CFC, CFC Europe, and Coding Products). This facility was formerly known and is sometimes still identified as CFC International. The facility has had the same ownership since at least 2013.

Process Description:

The ITW Specialty Films (ITW) facility embosses coatings on a polyethylene, PVC and polyester substrates that are received on rolls. Dyes are ground and mixed in solvents, including toluene, isopropyl ketone MEK and MIK. These materials are mostly hard piped from an outdoor tank farm to a mixing and grinding room where they are mixed and milled. Some solvents and dyes are held in drums and totes. Once mixed, coatings are applied to substrates in six coaters and 3 presses in a permanent total enclosure (PTE). Volatile organic compounds (VOCs) emitted from these coaters and presses are controlled by 4 regenerative thermal oxidizers (RTOs). One RTO is dedicated to coater C-22. The other 3 RTOs operate as necessary to control emissions from the remaining coaters and presses. Fans draw emissions via ducts associated with each coater and press while in operation. Coaters and presses cannot operate if the ducts are not drawing emissions to an operational RTO. Mixing drums are cleaned with solvent in the mixing and grinding room. VOC emissions from the mixing and grinding room are uncontrolled. Pressure drop at the duct inlet for each coater and press is monitored (i.e. facial pressure drop), but pressure drop across non-draft openings is not monitored for the PTE. Products are rolled for delivery to customers. No finishing is performed at this facility.

The facility is subject to NESHAP Subpart JJJJ for Web Coating.

TOUR INFORMATION

EPA toured the facility: Yes

Data Collected and Observations: EPA utilized a FLIR camera (MOV files) and regular camera (IMG files) to observe process operations and collect images.

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At the time of inspection, the facility was operating normally. VOCs were observed with the FLIR camera from:

- A tank being cleaned in the mixing and grinding room.
- Coater C-9.

Field Measurements: were not taken during this inspection.

RECORDS REVIEW

Facility layout (taken).
Process description (taken).

CLOSING CONFERENCE

Requested documents (to be provided via email):

- NESHAPs Subpart JJJJ Notice of Compliance Status.
- Any pressure monitoring for the PTE, including NDOs.
- Most recent performance test for each RTO.
- Any capture monitoring plan for the PTE.

SIGNATURES

Lead Inspector:



Date:

3-20-2019

Section Chief:



Date:

3/22/19

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DIGITAL IMAGE LOG*

1. Photographer: Gregory Gehrig, FLIR video and Eleanor Kane, photos	2. Date(s) of Inspection: March 15, 2019
3. Company/Facility Name: ITW Specialty Films	4. Street Address, City, State: 500 State Street, Chicago Heights, IL
5. Number of Images: 8	6. Archival Record Location: CD-R labeled ITW Images 3.15.2019

Image name	Date and Time* (CDT)	Description
IMG_0740.JPG	3/15/2019 13:50	Hard piping into mixing and grinding room.
IMG_0741.JPG	3/15/2019 13:54	Mixing tank.
IMG_0742.JPG	3/15/2019 13:57	Cleaning a mixing tank.
IMG_0743.JPG	3/15/2019 14:01	Mixing and grinding area.
IMG_0744.JPG	3/15/2019 14:05	Tank farm.
MOV_0032.mp4	3/15/2019 19:52	Cleaning a mixing tank.
MOV_0033.mp4	3/15/2019 20:00	Tank farm.
MOV_0034.mp4	3/15/2019 20:08	Coating line C-9.

*time stamp on MOV images (videos) is EDT.