

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
FIELD INSPECTION REPORT**



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SOURCE INFORMATION	
<u>SOURCE NAME</u>	ITU AbsorbTech, Inc.
<u>SOURCE LOCATION</u>	3900 W. William Richardson Drive, South Bend, Indiana 46628 St. Joseph County
<u>MAILING ADDRESS</u>	3900 W. William Richardson Drive, South Bend, Indiana 46628
<u>PLANT ID</u>	141-00116
<u>PERMIT INFORMATION</u>	Permit Type: TVOP Permit Number: 41541 Permit Expiration Date: 6/14/2022 VFC Document No.(hyperlink): 82824700
<u>ATTAINMENT STATUS</u>	☒ Attainment for all criteria pollutants ☐ Nonattainment for ☐ SO ₂ ☐ CO ☐ O ₃ ☐ NO ₂ ☐ Pb ☐ PM ₁₀ ☐ PM _{2.5}
<u>SOURCE STATUS</u>	☐ PSD Major (326 IAC 2-2) ☐ Major Source of HAPs ☐ Emission Offset (326 IAC 2-3) ☒ Area Source of HAPs ☐ Acid Rain (326 IAC 21)
<u>SOURCE DESCRIPTION</u>	Petroleum based dry cleaning operation. (Stoddard Solvent) The company processes rags, oil absorbent socks, gloves, and other oil-soaked materials at the facility.

INSPECTION INFORMATION			
<u>INSPECTED BY</u>	Richard Reynolds		
<u>INSPECTION DATE AND TIME</u>	12/16/2020	TIME IN: 10:00 AM	TIME OUT: 11:15 AM
<u>REPORTED BY</u>	Richard Reynolds <i>MRH</i> 12/18/2020	REPORT DATE: 12/17/2020	
<u>COMPLIANCE PERIOD REVIEWED</u>	11/1/2019 to 11/30/2020		
<u>INSPECTION NOTIFICATION</u>	☐ Unannounced ☒ Announced: Covid-19		
<u>INSPECTION OBJECTIVE(S)</u>	☒ Compliance Monitoring Strategy (CMS) ☐ Commitment ☐ Mega-Site: ☐ FCE ☐ PCE ☐ Complaint ☐ Other: ☐ Surveillance		
<u>ACES TRACKING NUMBER(S)</u>	Inspection: 253265	Complaint:	Violation/Warning: 253266
<u>RM TRACKING NUMBER(S)</u>	Complaint:		
<u>INSPECTION BACKGROUND</u>	Last inspection 10/24/2018. No violations were observed or determined during the inspection.		

SOURCE PERSONNEL INTERVIEWED			
Name	Title	Phone Number	Email Address
Jean Mavroff	Operations Manager	574-271-1900 Ext 229	jmaavroff@ituabsorbtech.com
Jerry Slocum	Maintenance Supervisor	574-271-1900 Ext 234	jslocum@ituabsorbtech.com

INSPECTION AND COMPLAINT HISTORY (PREVIOUS 5 YEARS)			
<i>Date</i>	<i>Inspection/Complaint Type</i>	<i>Result</i>	<i>Comments</i>
10/24/2018	CMS Inspection	No Violations Noted	
1/24/2017	CMS Inspection	No Violations Noted	

COMPLIANCE HISTORY (PREVIOUS 5 YEARS)			
Informal Enforcement Actions			
Date Issued	Action Taken	Describe Violation(s)	
	SELECT ACTION TAKEN		
Formal Enforcement Actions			
Case Number	Enforcement Type	Civil Penalty	Describe Violation(s)
	SELECT ENFORCEMENT TYPE	\$	
Other Relevant Actions			
Action Taken	Comments		

PERMIT SECTION D.1	
Emission Units and Control Devices:	
One (1) petroleum solvent dry-cleaning process, constructed in 1996, consisting of the following units:	
(a)	Nine (9) petroleum solvent recovery dryers, each with a maximum capacity of 100 pounds per load, each with lint bag for particulate control;
(b)	One (1) recovery tank, identified as T01, with a maximum capacity of five hundred (500) gallons of solvent, and an annual throughput of 3,877,600 gallons;
(c)	One (1) process tank, identified as T02, with a maximum capacity of 2,070 gallons of oil, and an annual throughput of 175,000 gallons;
(d)	One (1) process tank, identified as T03, with a maximum capacity of 7,260 gallons of oil, and an annual throughput of 150,000 gallons;
(e)	One (1) clean tank, identified as T04, with a maximum capacity of 7,260 gallons of solvent, and an annual throughput of 3,917,000 gallons;
(f)	One (1) transfer tank, identified as T05, with a maximum capacity of 5,165 gallons of solvent, and an annual throughput of 3,891,000 gallons;
(g)	One (1) dump tank, identified as T06, with a maximum capacity of 5,165 gallons of solvent, and an annual throughput of 3,891,000 gallons;
(h)	One (1) separator tank, identified as T07, with a maximum capacity of 1,500 gallons of solvent, and annual throughput of 3,891,000 gallons;
(i)	Three (3) chillers, each with a maximum capacity of 20 tons;
(j)	Three (3) primary stills, identified as Still-01, Still-02, and Still-03, each with a maximum capacity of 500 gallons per hour;

PERMIT SECTION D.1

- (k) One (1) secondary still, identified as Secondary Still-01, with a maximum capacity of 150 gallons per batch;
- (l) Three washers including the following:
- (1) One Washer, identified as W-01, with a maximum capacity of 500 pounds per load;
 - (2) One (1) washer, identified as W-03, approved in 2017 for construction, with a maximum capacity of 700 pounds of soiled towels per load; and
 - (3) One (1) washer, identified as W-02, approved in 2019 for construction, with maximum capacity of 700 pounds of soiled towels per load, with no control device.
- (m) Solvent recovery dry cleaning dryers, as follows
- (1) Two (2) petroleum solvent recovery dry cleaning dryers, identified as PM-10 and PM-11, each with a maximum capacity of 210 pounds per hour, constructed in 2014, each with lint bag for particulate control and exhausting to stack PRV-4.
 - (2) Three (3) solvent recovery dry cleaning dryers, identified as PM-12, PM-13, and PM-14, each with a maximum capacity of 210 pounds per hour, approved in 2019 for construction, each with lint bag for particulate control and exhausting to stack PRV-4

Pollutants with Emission Limits or Applicable Standards:

☐ SO₂ ☐ NO_x ☐ CO ☒ VOC ☒ PM ☒ PM₁₀ ☒ PM_{2.5} ☐ HAPS

Applicable Rules:

- 326 IAC 2-2, 2-7, 8-1, 6.5-1, 8-2

Requirement:	Applicable	Violation Noted
Emission Limitations and Standards	☒ Yes ☐ No	☐ Yes ☒ No
Preventive Maintenance Plan	☒ Yes ☐ No	☐ Yes ☒ No
Compliance Determination Requirements	☒ Yes ☐ No	☐ Yes ☒ No
Testing Requirements	☐ Yes ☒ No	☐ Yes ☐ No
Compliance Monitoring Requirements	☒ Yes ☐ No	☐ Yes ☒ No
Recordkeeping Requirements	☒ Yes ☐ No	☐ Yes ☒ No
Types of Records Reviewed: Material safety data sheets, Waste material being deducted, Total solvent input, Input of dry clean textiles, daily visible emission notations		
Reporting Requirements	☒ Yes ☐ No	☒ Yes ☐ No

Observations and Comments:

I met with Jean Mavroff and Jerry Slocum and provided compliance assistance for their permit and explained to them their permit and what was needed to maintain compliance. Ms. Mavroff was confused on how to calculate and record the input of new solvent to the entire dry-cleaning operation minus the amount of solvent which exited in the waste stream on a 12-month rolling average.

The pre-inspection review determined that the 2nd Q 2020 report was missing in VFC. During the inspection Ms. Mavroff confirmed that she had the 2nd Q report but had not submitted it yet. I explained to her that the failure to submit the 2nd quarters report in a timely manner would result in a violation letter.

Ms. Mavroff and Mr. Slocum accompanied me on an inspection of the facility. The facility was in operation at the time of the inspection as were the chillers and stills. I reviewed the VEE log and the preventative maintenance plan and found no problems.

Emission Unit or Control Device	Parameter	Permitted Value/Range	Observed
Lint bag	Opacity	40%	0% Opacity
Chillers and Stills	NA	NA	In Operation

PERMIT SECTION D.1					
<u>Permit Section Compliance Status:</u>					
☐ No violations were observed or determined for this permit section at the time of the inspection. ☒ The following violations were determined for this permit section at the time of the inspection:					
<table border="1" style="width: 100%; border-collapse: collapse;"> <tr style="background-color: #d9e1f2;"> <th style="text-align: left; padding: 2px;">Condition/Citation</th> <th style="text-align: left; padding: 2px;">Comments</th> </tr> <tr> <td style="padding: 2px;">D.1.11</td> <td style="padding: 2px;">Failure to submit a quarterly report within 30 days after the end of the reporting period.</td> </tr> </table>	Condition/Citation	Comments	D.1.11	Failure to submit a quarterly report within 30 days after the end of the reporting period.	
Condition/Citation	Comments				
D.1.11	Failure to submit a quarterly report within 30 days after the end of the reporting period.				

PERMIT SECTION D.2		
<u>Emission Units and Control Devices:</u>		
(a)	Emission units with PM and PM ₁₀ emissions less than five (5) tons per year, SO ₂ , NO _x and VOC emissions less than ten (10) tons per year, CO emissions less than twenty-five (25) tons per year, lead emissions less than two-tenths (0.2) tons per year, single HAP emissions less than one (1) ton per year, and combination of HAPs emissions less than two and a half (2.5) tons per year:	
(1)	One (1) welding and flame cutting station used for maintenance purposes];	
(b)	Paved roads and parking areas; and	
(c)	Natural gas fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour, including the following:	
(1)	One (1) natural gas-fired boiler, identified as B-01, constructed in 1996, with a maximum capacity of 4.1 million British thermal units per hour;	
(2)	One (1) natural gas-fired boiler, identified as B-02, constructed in 2017, with a maximum capacity of 4.2 million British thermal units per hour;	
(3)	One (1) natural gas-fired roof top heater, identified as RTU-2, constructed in 1996, with a maximum capacity of 0.8 million British thermal units per hour; and	
(4)	Two (2) natural gas-fired radiant space heaters, identified as MUA-1 and MUA-2, both constructed in 1996, each with a maximum capacity of 0.8 million British thermal units per hour.	
<u>Pollutants with Emission Limits or Applicable Standards:</u>		
☐ SO ₂ ☐ NO _x ☐ CO ☐ VOC ☒ PM ☐ PM ₁₀ ☐ PM _{2.5} ☐ HAPS		
<u>Applicable Rules:</u>		
• 326 IAC 6.5-1, 2-7		
<u>Requirement:</u>	Applicable	Violation Noted
Emission Limitations and Standards	☒ Yes ☐ No	☐ Yes ☒ No
Preventive Maintenance Plan	☒ Yes ☐ No	☐ Yes ☒ No
Compliance Determination Requirements	☐ Yes ☒ No	☐ Yes ☐ No
Testing Requirements	☐ Yes ☒ No	☐ Yes ☐ No
Compliance Monitoring Requirements	☐ Yes ☒ No	☐ Yes ☐ No
Recordkeeping Requirements	☐ Yes ☒ No	☐ Yes ☐ No
<u>Types of Records Reviewed:</u>		
Reporting Requirements	☐ Yes ☒ No	☐ Yes ☐ No
<u>Observations and Comments:</u>		

PERMIT SECTION D.2

The boilers and space heaters were in operation at the time of the inspection. No changes or modifications were observed. The preventative maintenance plan was reviewed.

<i>Emission Unit or Control Device</i>	<i>Parameter</i>	<i>Permitted Value/Range</i>	<i>Observed</i>
Boilers and space heaters	NA	NA	In Operation

Permit Section Compliance Status:

- ☒ No violations were observed or determined for this permit section at the time of the inspection.
☐ The following violations were determined for this permit section at the time of the inspection:

<i>Condition/Citation</i>	<i>Comments</i>

PERMIT SECTION E.1

Emission Units and Control Devices:

- (a) Nine (9) petroleum solvent recovery dry cleaning dryers, each with a maximum capacity of 100 pounds per load, each with lint bag for particulate control;
- (b) One (1) recovery tank, identified as T01, with a maximum capacity of five hundred (500) gallons of solvent, and an annual throughput of 3,877,600 gallons;
- (c) One (1) process tank, identified as T02, with a maximum capacity of 2,070 gallons of oil, and an annual throughput of 175,000 gallons;
- (d) One (1) process tank, identified as T03, with a maximum capacity of 7,260 gallons of oil, and an annual throughput of 150,000 gallons;
- (e) One (1) clean tank, identified as T04, with a maximum capacity of 7,260 gallons of solvent, and an annual throughput of 3,917,000 gallons;
- (f) One (1) transfer tank, identified as T05, with a maximum capacity of 5,165 gallons of solvent, and an annual throughput of 3,891,000 gallons;
- (g) One (1) dump tank, identified as T06, with a maximum capacity of 5,165 gallons of solvent, and an annual throughput of 3,891,000 gallons;
- (h) One (1) separator tank, identified as T07, with a maximum capacity of 1,500 gallons of solvent, and annual throughput of 3,891,000 gallons;
- (i) Three (3) chillers, each with a maximum capacity of 20 tons;
- (j) Three (3) primary stills, identified as Still-01, Still-02, and Still-03, each with a maximum capacity of 500 gallons per hour;
- (k) One (1) secondary still, identified as Secondary Still-01, with a maximum capacity of 150 gallons per batch;
- (l) Three washers including the following:
 - (1) One Washer, identified as W-01, with a maximum capacity of 500 pounds per load;
 - (2) One (1) washer, identified as W-03, approved in 2017 for construction, with a maximum capacity of 700 pounds of soiled towels per load; and

PERMIT SECTION E.1			
(3)	One (1) washer, identified as W-02, approved in 2019 for construction, with maximum capacity of 700 pounds of soiled towels per load, with no control device.		
(m)	Solvent recovery dry cleaning dryers, as follows		
(1)	Two (2) petroleum solvent recovery dry cleaning dryers, identified as PM-10 and PM-11, each with a maximum capacity of 210 pounds per hour, constructed in 2014, each with lint bag for particulate control and exhausting to stack PRV-4.		
(2)	Three (3) solvent recovery dry cleaning dryers, identified as PM-12, PM-13, and PM-14, each with a maximum capacity of 210 pounds per hour, approved in 2019 for construction, each with lint bag for particulate control and exhausting to stack PRV-4.		
<u>Pollutants with Emission Limits or Applicable Standards:</u>			
☐ SO ₂ ☐ NO _x ☐ CO ☒ VOC ☐ PM ☐ PM ₁₀ ☐ PM _{2.5} ☐ HAPS			
<u>Applicable Rule:</u>			
40 CFR Part 60, Subpart JJJ			
<u>Applicability Information:</u>			
ITU AbsorbTech, Inc. is an affected facility. The provisions of this subpart are applicable to affected facilities located at a petroleum dry cleaning plant with a total manufacturers' rated dryer capacity equal to or greater than 38 kilograms (84 pounds) that commences construction or modification after December 14, 1982.			
<u>Requirement:</u>		Applicable	Violation Noted
Emission Limitations/Standards		☐ Yes ☒ No	☐ Yes ☒ No
Work Practice/Operating Requirements		☒ Yes ☐ No	☐ Yes ☒ No
Compliance Monitoring Requirements		☒ Yes ☐ No	☐ Yes ☒ No
Testing Requirements		☒ Yes ☐ No	☐ Yes ☒ No
Record Keeping Requirements		☒ Yes ☐ No	☐ Yes ☒ No
Types of Records Reviewed: leak checks			
Reporting Requirements		☐ Yes ☒ No	☐ Yes ☐ No
Preventive Maintenance Plan [326 IAC 1-6-3]		☐ Yes ☒ No	☐ Yes ☐ No
<u>Observations and Comments:</u>			
The solvent dry-cleaning dryers were in operation at the time of the inspection as were the chillers and stills. The company had the equipment as stated in the permit. No changes or modifications were observed at the time of the inspection. There are no emissions limitations in Subpart JJJ, however; affected petroleum solvent dry-cleaning dryers shall be solvent recovery dryers. ITU AbsorbTech is using solvent recovery dryers. ITU AbsorbTech, Inc. is subject to 40 CFR 60.622(a) and was required to perform an initial test to verify that the flow rate of recovered solvent from the solvent recovery dryer at the termination of the recovery cycle is no greater than 0.05 liters per minute. On 1/6/1997 ITU AbsorbTech began testing for 35 days and determined compliance with notification to IDEM on 3/17/1997.			
<i>Emission Unit or Control Device</i>	<i>Parameter</i>	<i>Permitted Value/Range</i>	<i>Observed</i>
Solvent recovery dryer	Flow rate of recovered solvent	<0.05 liters per minute	<0.05 liters
<u>Permit Section Compliance Status:</u>			

PERMIT SECTION E.1	
☒ No violations were observed or determined for this permit section at the time of the inspection. ☐ The following violations were determined for this permit section at the time of the inspection:	
<i>Condition/Citation</i>	<i>Comments</i>

ADDITIONAL SOURCE COMPLIANCE REVIEW:	
The following reports are required and were reviewed: ☒ Annual Compliance Certification(s) ☒ Deviation & Compliance Monitoring Report(s) ☐ Annual Notification(s) ☐ Emission Statement(s)	
The reports are consistent with inspection observations.	☒ Yes ☐ No ☐ N/A
The permit accurately represents emission units observed on site.	☒ Yes ☐ No ☐ N/A
Compliance assistance was provided during the inspection.	☒ Yes ☐ No ☐ N/A
The source is required to have a Risk Management Plan [40 CFR 68]. If yes, the source has a plan. If yes, the employees have been trained.	☐ Yes ☒ No ☐ Yes ☐ No ☒ N/A ☐ Yes ☐ No ☒ N/A
Additional Information and Comments:	
The records review determined that the company is not violating the 75, 000 gallons per twelve (12) consecutive month period limit located in condition D.1.1.	
Additional Source Compliance Review Status:	
☒ No violations were observed or determined at the time of the inspection. ☐ The following violations were determined at the time of the inspection:	
<i>Condition/Citation</i>	<i>Description of Violation(s)</i>

INSPECTION FINDINGS	
☐ No violations were observed or determined at the time of the inspection. ☒ The following violations were determined at the time of the inspection:	
<i>Condition/Citation</i>	<i>Description of Violation(s)</i>
D.1.11	Failure to submit a 2 nd 2020 quarterly report within 30 days after the end of the reporting period.
RECOMMENDED ACTION	Issue inspection summary/violation letter.
EXIT INTERVIEW	I explained my findings, recommendations, and conclusions with Ms. Mavroff prior to exiting the facility.