



REGION 5

CHICAGO, IL 60604

MEMORANDUM

SUBJECT: CLEAN AIR ACT INSPECTION REPORT
The Garland Company, Cleveland, OH

FROM: Aileen Drum, Physical Scientist
AECAB (IL/IN)

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

TO: File

BASIC INFORMATION

Facility Name: The Garland Company

Facility Location: 3800 East 91st Street, Cleveland, OH 44105

Date of Inspection: April 23, 2024

EPA Inspector(s):

1. Aileen Drum, Physical Scientist
2. Natalia Vazquez, Environmental Engineer

Other Attendees:

1. Jeremy Penman, EHS Manager
 2. Derek Scavuzzo, Quality Manager
 3. Melissa Rus, R&D Director *
 4. Bryan Taylor, Plant Manager *
- * Participated in closing conference only.

Contact Email Address: jpenman@garland.com

Purpose of Inspection: To determine compliance with the conditions of the Air Pollution Permit to Install and Operate issued on January 24, 2022, and the Ohio State Implementation Plan (SIP).

Facility Name: The Garland Company
Facility Location: 3800 East 91st Street, Cleveland, OH 44105
Date of Inspection: April 23, 2024

Facility Type: Asphalt Shingle and Coating Materials

Regulations Central to Inspection: 40 C.F.R Part 63 Subpart AAAAAAA, the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Area Sources: Asphalt Processing and Asphalt Roofing Manufacturing and the Ohio SIP.

Arrival Time: 10:48 AM

Departure Time: 1:30 PM

Inspection Type:

- ☒ Unannounced Inspection
- ☐ Announced Inspection

OPENING CONFERENCE

- ☒ Presented Credentials
- ☒ Stated authority and purpose of inspection
- ☒ Provided Small Business Resource Information Sheet
- ☒ Provided CBI warning to facility

The following information was obtained verbally from Jeremy Penman, Derek Scavuzzo, Melissa Rus, and Bryan Taylor unless otherwise noted.

Process Description:

The Garland Company has two main processes. The first process is coating and adhesive manufacturing for the roofing industry. Raw materials including polymer, asphalt cutbacks, solvents, fillers, and additives are received by trucks and tanker trucks and stored in a tank farm. Raw materials are added to mixers in batches per work order instructions. Once mixed, products are quality tested, packaged, moved to a warehouse, and then shipped out to customers.

The second process is the roll goods process where roll roofing is manufactured. Raw products including polymer, asphalt, fillers, and additives are mixed per work order instructions and then added to a use tank where a continuous process commences. Large sheets of scrim are coated and then treated with additional material such as sand or granule to prevent sticking or to create a reflective quality. The sheets are cooled, packaged, quality tested, and then moved to a warehouse to await distribution to customers.

Staff Interview: The Garland Company operates 24/7 and has approximately 100 full-time employees. The facility has two dust collectors, one for the coatings and adhesives manufacturing process and one for the roll goods process. According to staff, pressure drop is monitored as an indicator of when filters need to be changed, and a reading of eight or nine inches of water would trigger a filter change.

TOUR INFORMATION

EPA Toured the Facility: Yes

Data Collected and Observations:

EPA walked the production line from where raw materials are received to where final products depart. EPA began with the coatings and adhesives manufacturing process. Five of the nine mixers were missing their lids and Mr. Penman and Mr. Scavuzzo were unsure of the last time the lids were intact on the machines that did not have them. EPA took photos of the mixers and a video of mixer five operating uncovered during the tour. The pressure drop on the dust collector was recorded fluctuating between 1.5 and 2.3 inches of water.

Next EPA observed the roll goods process. An indent was observed on a pipe connecting the use tank to the baghouse. Staff said the pipe had fallen, sustained the dent, and then was reinstalled by maintenance. A large exhaust fan was observed on the ceiling to draw air out of the building. A black residue was observed running along pipes leading to the baghouse and there were several areas on the piping that looked distressed. The pressure drop on the dust collector read 4.5 inches of water.

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

Field Measurements: were not taken during this inspection.

RECORDS REVIEW

- Manufacturing Flow Chart: Roll Goods (1 page)
- Manufacturing Flow Chart: Coatings & Adhesives (1 page)
- Manufacturing Flow Chart: Waterproofing-Cleveland (1 page)

CLOSING CONFERENCE

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

Requested documents:

- Site Specific Monitoring Plan;
- All Emissions tests dating back 10 years;
- 2023 Permit Evaluation Report (PER);
- 2023 and 2024 Quarterly Deviation Reports;
- Facility-wide emissions calculations including all emissions factors and assumptions in an unlocked excel spreadsheet for the preceding 12-months;
- Throughput and production calculations for the preceding 12-months;
- Initial Permit Application;
- Permit application that includes the ceiling fan above the “use tank” in the “roll goods” area;

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- Records of visual emissions/ opacity monitoring for the preceding 12-months;
- Capture efficiency and capacity for the baghouses;
- Incident report and maintenance records for the pipe that fell from the use tank;
- SDSs for all HAP and VOC containing materials (indicate whether the material is used or produced);
- Tank farm map;
- Initial notification of for NESHAP AAAAAAA;
- Notification of compliance status for NESHAP AAAAAAA; and
- Compliance report for NESHAP AAAAAAA.

Concerns: EPA expressed concern about the uncovered mixers, the distressed areas in the ventilation leading to the dust collector, and the exhaust fan on the ceiling.

DIGITAL SIGNATURES

Report Author: AILEEN
DRUM  Digitally signed by
AILEEN DRUM
Date: 2024.06.06
10:09:22 -05'00'

Section Supervisor: NATHAN
FRANK  Digitally signed by
NATHAN FRANK
Date: 2024.06.07
09:48:50 -05'00'

APPENDICES

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

Facility Name: The Garland Company
Facility Location: 3800 East 91st Street, Cleveland, OH 44105
Date of Inspection: April 23, 2024

APPENDIX A: DIGITAL IMAGE LOG AND DIGITAL VIDEO LOG

Inspector Name: Natalia Vazquez **Archival Record Location:** AECAB Library >
Enf_TheGarlandCompany_OH_24 > Enf_TheGarlandCompany_OH_24_Inspection

PHOTO LOG:

Image Number	File Name	Date and Time	Description of Image
1	IMG_0571.JPG	4/23/2024 10:56 AM CDT	Mixing tank no. 4 with closed cover in the coating and adhesive process.
2	IMG_0572.JPG	4/23/2024 10:57 AM CDT	Mixing tank no. 3 with cover open in the coating and adhesive process.
3	IMG_0573.JPG	4/23/2024 10:57 AM CDT	Mixing tank no. 2 without cover in the coating and adhesive process.
4	IMG_0574.JPG	4/23/2024 10:57 AM CDT	Mixing tank no. 1 without cover in the coating and adhesive process.
5	IMG_0575.JPG	4/23/2024 10:58 AM CDT	Mixing tank no. 7 with open with cover next to the tank in the coating and adhesive process.
6	IMG_0576.JPG	4/23/2024 10:59 AM CDT	Mixing tank no. 8 without cover in the coating and adhesive process.
7	IMG_0577.JPG	4/23/2024 10:59 AM CDT	Mixing tank no. 9 without cover in the coating and adhesive process.
8	IMG_0578.JPG	4/23/2024 11:01 AM CDT	Back side of mixing tank no. 5 in the coating and adhesive process.
9	IMG_0579.JPG	4/23/2024 11:01 AM CDT	Mixing tank no. 5 with open cover in the coating and adhesive process.
10	IMG_0581.JPG	4/23/2024 11:04 AM CDT	Mixing tank no. 6 with open cover in the coating and adhesive process.
11	IMG_0583.JPG	4/23/2024 11:09 AM CDT	Bottom of dust collector in the coating and adhesive process.
12	IMG_0584.JPG	4/23/2024 11:09 AM CDT	Drum used to empty dust collector in the coating and adhesive process.
13	IMG_0585.JPG	4/23/2024 11:09 AM CDT	Bottom of dust collector in the coating and adhesive process.
14	IMG_0586.JPG	4/23/2024 11:15 AM CDT	Pipe connecting mixer no. 2 to dust collector in the roll goods process.
15	IMG_0587.JPG	4/23/2024 11:15 AM CDT	Pipe connecting mixer no. 2 to dust collector in the roll goods process.
16	IMG_0588.JPG	4/23/2024 11:15 AM CDT	Dust in the area above mixer no. 2 in the roll goods process.
17	IMG_0589.JPG	4/23/2024 11:16 AM CDT	Dust in the area above mixer no. 2 in the roll goods process.

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18	IMG_0590.JPG	4/23/2024 11:17 AM CDT	Bottom of pipe connecting mixer 1 to dust collector in the roll goods process.
19	IMG_0591.JPG	4/23/2024 11:18 AM CDT	Pipe connecting mixer 1 to dust collector in the roll goods process.
20	IMG_0592.JPG	4/23/2024 11:18 AM CDT	Pipe connecting mixer 1 to dust collector (before elbow) in the roll goods process.
21	IMG_0593.JPG	4/23/2024 11:23 AM CDT	Pipe connecting use tank to dust collector that fell in roll goods process.
22	IMG_0594.JPG	4/23/2024 11:23 AM CDT	Pipe indentation on the pipe connecting use tank to dust collector that fell in roll goods process.
23	IMG_0595.JPG	4/23/2024 11:27 AM CDT	Fan above use tank on ceiling above use tank in the roll goods process.
24	IMG_0596.JPG	4/23/2024 11:30 AM CDT	Black stain in pipe routing emissions to dust collector.
25	IMG_0597.JPG	4/23/2024 11:32 AM CDT	Pipe routing emission to dust collector.
26	IMG_0598.JPG	4/23/2024 11:36 AM CDT	Capture hood above the asphalt saturator and coater in the roll goods process.
27	IMG_0599.JPG	4/23/2024 11:36 AM CDT	Capture hood above the asphalt saturator and coater in the roll goods process.
28	IMG_0600.JPG	4/23/2024 11:46 AM CDT	Asphalt storage tanks (only half of horizontal tank is being used) for the coating and adhesive process.
29	IMG_0601.JPG	4/23/2024 11:48 AM CDT	Dust collector for asphalt roll good process.

VIDEO LOG:

Image Number	File Name	Date and Time	Description of Video
1	MVI_0580.MP4	4/23/2024 11:01 AM CDT	Mixing tank no. 5 with open cover, while in operations, in the coating and adhesive process.
2	MVI_0582.MP4	4/23/2024 11:05 AM CDT	Pipe routing emissions from the mixing tanks to dust collector in the coating and adhesives process.