



REGION 5

CHICAGO, IL 60604

MEMORANDUM

SUBJECT: CLEAN AIR ACT INSPECTION REPORT
Newkor Inc., Cleveland, Ohio

FROM: Justin Smith, Environmental Engineer
AECAB (IL/IN)

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

TO: File

BASIC INFORMATION

Facility Name: Newkor, Inc.

Facility Location: 10410 Berea Road, Cleveland, OH 44102

Date of Inspection: April 25, 2024

EPA Inspector(s):

1. Justin Smith, Environmental Engineer
2. Veronica Fischer, Environmental Engineer
3. Emily Szwiec, Life Scientist

Other Attendees:

1. Matthew Banks, Plant Manager, Newkor
2. Annette Kinder, Office Manager, Newkor

Contact Email Address: mbanks@newkor.com

Purpose of Inspection: To evaluate compliance with emission requirements in facility's Permit-to-Install and Operate (PTIO), P0129711. Facility was also inspected as a part of the Cleveland community group initiative.

Facility Type: Paper based tubing manufacturing

Facility Name: Newkor, Inc.
Facility Location: 10410 Berea Rd., Cleveland OH 44102
Date of Inspection: April 25, 2024

Regulations Central to Inspection: Facility is subject to their federally enforceable PTIO and Ohio's State Implementation Plan (SIP).

Arrival Time: 9:00 AM
Departure Time: 10:20 AM

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
- ☒ Provided CBI warning to facility

The following information was obtained verbally from Newkor staff unless otherwise noted.

Company Ownership: Newkor changed ownership in September 2023. The business was registered by AL Legacy, LLC, but the business name did not change.

Process Description:

The facility manufactures spiral wound phenolic and plain paper tubing. The facility receives recycled paper, paperboard, polymer and yeast-based adhesives, and phenolic resins. The paper is rolled around a mandrel to form a tube. The facility's coating line consists of two 400-gallon dipping tanks, a drying room, and two curing ovens. The paper tube is manually placed in the dipping tanks containing the liquid adhesives and resins. The coated paper tube is left in the drying room for at least a day before being placed into a curing oven. The cured paper tube is then packed and shipped.

Staff Interview:

The facility uses steel racks to manually transfer tubing through the coating line process. There are two storage tanks on site containing acetone, which is used to help facilitate the penetration process of the resin. Primarily, only one of the curing ovens is used, while the other is a backup in case more capacity is needed. There are three venting systems: one for the dipping room; one for the drying room; and one that encompasses both.

TOUR INFORMATION

EPA Toured the Facility: Yes

Data Collected and Observations:

EPA observed the dipping tanks. Paper tubing was not being coated at the time of inspection.

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

Field Measurements: were not taken during this inspection.

RECORDS REVIEW

1. 2018 Phenolic Resin SDS (9 pages)

CLOSING CONFERENCE

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

Requested documents:

- VOC and HAP emissions and the calculations of those emissions at the facility from March 2021 to March 2024
- SDSs for adhesives stored and used at the facility
- Any record of testing or analysis done on the resin received at the facility
- Deviation reports submitted to Ohio EPA from Q1 2021 to Q1 2024
- Latest copy of facility's PTIO

DIGITAL SIGNATURES

Report Author: Smith, Justin Digitally signed by Smith, Justin
Date: 2024.06.13 10:31:39
-05'00'

Section Supervisor: NATHAN FRANK Digitally signed by NATHAN
FRANK
Date: 2024.06.17 14:55:59 -05'00'