



REGION 5

CHICAGO, IL 60604

MEMORANDUM

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

FROM: Natalia Vazquez, Environmental Engineer
AECAB (MI/WI)

THRU: Sarah Marshall, Section Supervisor
AECAB (MI/WI)

TO: File

BASIC INFORMATION

Facility Name: Tremco CPG Inc.

Facility Location: 4475 East 175Th Street, Cleveland, Ohio

Date of Inspection: April 22, 2024

EPA Inspector(s):

1. Natalia Vazquez, Environmental Engineer
2. Carlo Demma, Physical Scientist (Env.)

Other Attendees:

1. Nick Shun Environment, Health and Safety, Tremco
2. Igor Mijic, Plant Manager, Tremco
3. Philip Kalal Director of Manufacturing, Tremco
4. Michael Adamczyk, Engineering and Facilities Manager, Tremco

Contact Email Address: nshun@tremcoinc.com

Purpose of Inspection: Hazardous air pollutant inspection

Facility Type: Rubberized sealant manufacturing

Facility Name: Tremco CPG Inc.
Facility Location: Cleveland, Ohio
Date of Inspection: April 22, 2024

Regulations Central to Inspection: State permit requirements and may be subject to 40 C.F.R. Part 63 Subpart CCCCCC

Arrival Time: 1:00 p.m.

Departure Time: 5:00 p.m.

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 Nick Shun, Igor Mijic, Philip Kalal, and Mike Adamczyk unless otherwise noted.

Process Description:

Tremco CPG Inc. (Tremco or Facility) is a sealant manufacturer for the construction and restoration industry. All raw material is received by trucks. The bulk material storage area has nine storage tanks. Powder additives are stored in 50 pounds bags. The Facility has 15 mixers, referred to as kettles, used during the manufacturing of the solvent-based sealants. The odd numbered kettles manufacture longer chained polymers using urethane, while the even numbered kettles add additional additives to the long-chained polymer. Liquid and powder additive materials are added to the kettles to lower viscosity and for some products to provide ultraviolet light stability. The end products are packaged on five gallon buckets, cartridges, or sausage-shaped packages.

Staff Interview: The Facility has replaced some of its old packaging lines for automated lines, replaced some bulk storage tanks, and it has purchased a calk tube machinery within the past five years. There has been some increase in production, but it wasn't the basis for its capital investments.

TOUR INFORMATION

EPA Toured the Facility: Yes

Data Collected and Observations:

EPA examined the main baghouse. The baghouse had a large crack in the clean air side of that controls Unit K-10 Rotating Dryer emissions. The pressure gauge reading indicated 3.5 inches of water column.

Facility Name: Tremco CPG Inc.

Facility Location: Cleveland, Ohio

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EPA inspected all the tanks containing raw materials used in the rubber sealant process. Importantly, EPA noted the indicator screen on storage tank no. 150 wasn't functioning, and that the emergency vents of storage tanks no. 152, 153, and 156 had an emission leak and the top of the tank was stained with material spillage.

Table 1: Tanks inspection notes from C. Demma

Tank	Pressure (PSI)	% Full	Gallons stored (Lbs)	Notes (if applicable)
150	0.052	Broken	N/A	Continuous level monitor readout broken.
151	0.017	38%	N/A	
152	0.050	N/A	51,696	Gasket on emergency vent visibly leaking fumes. FLIR
153	0.157	N/A	66,240	Gasket on emergency vent visibly leaking fumes. FLIR
154	0.362	39.33	N/A	
155	3.8	16.739	N/A	
156	0.004	-	N/A	% full gauge not accessible. Has 2 emergency vents, FLIR. Gasket on emergency vent visibly leaking fumes.
124	0.065	78.9%	N/A	Has 2 emergency vents, FLIR
123	0.04	32%	N/A	Has 2 emergency vents, FLIR

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

Photographs were taken with a Canon 360HS digital camera.

Videos were taken with the FLIR GF 320 IR camera.

Field Measurements: were not taken during this inspection.

RECORDS REVIEW

1. Facility map

CLOSING CONFERENCE

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

Requested documents:

- Safety data sheets of materials that contain xylene, cadmium, chromium, lead, nickel and/or benzene;
- Last performance test (i.e., emission test, stack test) completed on the baghouse;

Facility Name: Tremco CPG Inc.
Facility Location: Cleveland, Ohio
Date of Inspection: April 22, 2024

- 12-month rolling averages of hazardous air pollutants (total and each individual HAP) for the past 3 years on an excel spreadsheet;
- Equations and assumptions used in the HAP calculations;
- Daily monitoring data of the dust collector for the past year; and
- 3 years of the annual deviation report and the last quarterly deviation report.

Concerns: The crack on the baghouse clean air side. The tank level sensor's screen appeared to be burned out, on storage tank 150. The emergency vent of three storage tanks were venting gas.

DIGITAL SIGNATURES

Report Author: NATALIA
VAZQUEZ RIVERA Digitally signed by NATALIA
VAZQUEZ RIVERA
Date: 2024.05.20 14:09:31
-05'00'

Section Supervisor: SARAH
MARSHALL Digitally signed by SARAH
MARSHALL
Date: 2024.05.22 09:42:28 -05'00'

APPENDICES

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

Facility Name: Tremco CPG Inc.
Facility Location: Cleveland, Ohio
Date of Inspection: April 22, 2024

APPENDIX A: DIGITAL IMAGE LOG AND DIGITAL VIDEO LOG

Inspector Name: Carlo Demma, Natalia Vazquez **Archival Record Location:** [Photographs](#), [videos](#)

Image Number	File Name	Date and Time (incl. Time zone and DST)	Description of Image
1	IMG_0568.JPG	4/22/2024 1:56:00 PM	Dust collector with hole on the exhaust pipe
2	IMG_0569.JPG	4/22/2024 1:57:00 PM EST	Dust collector with hole on the exhaust pipe
3	IMG_0570.JPG	4/22/2024 2:15:00 PM EST	Emergency vent of tank 152
4	MOV_0005.mp4	4/22/2024 3:22:00 PM EST	Emergency vent venting on storage tank number 153
5	MOV_0006.mp4	4/22/2024 3:23:00 PM EST	Emergency vent venting on storage tank number 153
6	MOV_0007.mp4	4/22/2024 3:23:00 PM EST	Emergency vent venting on storage tank number 153
7	MOV_0008.mp4	4/22/2024 3:24:00 PM EST	Emergency vent venting on storage tank number 153
8	MOV_0009.mp4	4/22/2024 3:24:00 PM EST	Emergency vent venting on storage tank number 153
9	MOV_0010.mp4	4/22/2024 3:31:00 PM EST	Emergency vent venting on storage tank number 152
10	MOV_0011.mp4	4/22/2024 3:33:00 PM EST	Emergency vent venting on storage tank number 152
11	MOV_0012.mp4	4/22/2024 3:47:00 PM EST	Emergency vent venting on storage tank number 156