



City of Cleveland
Frank G. Jackson, Mayor

Department of Public Health
Division of Air Quality
1925 St. Clair Avenue
Cleveland, Ohio 44114-2080
216/664-2297 • Fax: 216/420-8047
www.clevelandhealth.org

SERVING OHIO EPA AS AGENCY 13
FOR CUYAHOGA COUNTY

CERTIFIED MAIL 7002 2030 0001 1808 4772
RETURN RECEIPT REQUESTED

September 8, 2008

Gordon Barr
Newkor, Incorporated
10410 Berea Road
Cleveland, OH 44102

NON-HPV

FACILITY ID: 13-18-00-5362

NOTICE OF VIOLATION: AIR POLLUTION NUISANCE AND OPERATING TWO DIP
TANKS WITHOUT PERMITS TO INSTALL AND OPERATE

Dear Mr. Barr:

On September 8, 2008, the Cleveland Division of Air Quality (CDAQ) responded to an odor complaint at Newkor, Incorporated located at 10410 Berea Road in Cleveland. This letter serves as notification that you are operating sources in violation of the following applicable air statutes, air regulations, or air permit conditions.

CDAQ detected chemical odors from Newkor, Incorporated's operation of P001: Midland Ross Gas-fired Batch Bake Oven #2, P002: Midland Ross Gas-fired Batch Bake Oven #1 and P004: Two Dip Tanks for Resin Application on Paper Rolls. The odors from P001 and P002 are a violation of the City of Cleveland Codified Ordinance 277.08 for creating an air pollution nuisance. The odors from P004 are a violation of the City of Cleveland Codified Ordinance 277.08 and Ohio Administrative Code (OAC) Rule 3745-15-07 for also creating an air pollution nuisance.

P004 has been operating without a permit to operate since 12/21/92. This is a violation of Ohio Administrative Code (OAC) Rule 3745-31-02 (A) (1) and Ohio Revised Code (ORC) 3704.05 (F) and (G).

Unless you undertake some type of corrective action with respect to the above noted violations, you will remain in non-compliance. CDAQ requests that Newkor, Incorporated submit a corrective action plan to decrease or eliminate the nuisance odors and to submit new Permit to Install/Operate (PTIO) applications (which can be found at <http://www.epa.state.oh.us/dapc/fops/eac/eacforms.html>) for the two dip tanks to the following enforcement representative:



Andrew Marantides
Cleveland Division of Air Quality
1925 St. Clair Avenue NE
Cleveland, Ohio 44114-2080

Your written response to this letter must be received by CDAQ within fourteen (14) days of your receipt of this letter. If there is insufficient time to correct the alleged violations within this timeframe, your response must include a timeline for correcting the alleged violations.

Violations of Ohio air pollution laws and /or permit terms and conditions are subject to the penalties stipulated in Ohio Revised Code Section 3704.99(A), which allows fines of not more than twenty-five thousand dollars or imprisonment for not more than one year, or both, for each violation.

Free assistance with state and/or federal regulations, rules, laws or permit conditions can be provided at no charge through the Ohio EPA Office of Compliance Assistance and Pollution Prevention (OCAPP). OCAPP can be contacted at <http://www.epa.state.oh.us/ocapp> or (614) 644-3469 or (800) 329-7518. CDAQ makes no guarantee that the facility will meet the qualifying guidelines established by OCAPP.

CDAQ issues this letter with Ohio EPA's concurrence. The failure to mention any specific violation does not excuse any violations of local, state and federal laws or regulations regarding air pollution control. Violations of air pollution control laws may be pursued in local court or referred to Ohio EPA or U.S. EPA for further enforcement action. Should you have any questions, please call Andrew Marantides at (216) 420-8049. All correspondence with CDAQ must include the Ohio EPA facility identification number for Newkor, Incorporated: 13-18-00-5362.

Sincerely,

George Baker
Chief of Enforcement, CDAQ

GB/AM

cc: Richard Nemeth and Michael J. Krzywicki, CDAQ
John Paulian, Ohio EPA Central Office
Lisa Holscher, U.S. EPA Region V
Facility File and L:\Data\Facilities\1318005362\2008-09-08 NOV.docx

Division of Air Quality

Date: January 05, 2009
To: FILE, 13-18-00-5362
From: Valerie Shaffer, Enforcement Specialist, Division of Air Quality
RE: Communications with NewKor personnel
Attach: 1/16/2009 email from Gordon Barr, NewKor
1/21/2009 email from Adrienne LaFavre, OCAPP
2/25/2009 email from Adrienne LaFavre, OCAPP

I talked with Gordon Barr via phone today. I told Mr. Barr that I was on my way out the door to pick up more information from Annette and if he was there that we could sit down and discuss all this. He wasn't at the office today and suggested tomorrow at 11:00 a.m.

He wanted to know if he was in trouble. I explained to him that normally what happens is that a NOV is issued and the facility then responds with a corrective action detailing how they will come into compliance. I explained the magnitude of noncompliance with him, specifically reflecting on the facility's usage of VOCs and methanol and phenol, which are both HAPs.

He exclaimed that usage was way down from when he bought the company and wondered how he wasn't aware of the permitting process. I explained that Title V came around in 1996, and that the latest application that we have for the dipping tanks was submitted in 1988 with the following usage 146,636 lbs/yr of Resin and 276,154 lbs/yr of IPA (solvent). This usage totals roughly 179 tpy of VOC (HAPs not calculated out). I also expressed to Mr. Barr that it wasn't normal to find a facility with such high actual emissions that has flown under our radar for so long. I mentioned that a fine could be assessed since his emissions were so high. I also informed Mr. Barr that my inspection report was not finished and that my supervisor had not reviewed my report yet.

I also pressed upon Mr. Barr that without production documents, testing, or analysis regarding his process, I must assume that all VOCs from the solvent and resin were being emitted to atmosphere. In response, Mr. Barr questioned Adrienne LaFavre's involvement, because CDAQ had directed him to her when NewKor was under odor complaint investigations.

I explained that since I was out there for a full compliance evaluation and found that NewKor is likely a major source of VOC (above the 100 tpy) and HAP (above the 10 tpy for Methanol alone) emissions; then Adrienne might not have jurisdiction, because NewKor no longer meets the criteria of a small business.

I also talked with Annette Kinder, the office manager, on 1/5/2009. She is finding out if and how much hazardous waste went out.



MEMORANDUM:
Cleveland Division of Air Quality

UPDATE: 1/6/2009

I revisit NewKor. Both Annette Kinder and Gordon Barr were present. According to them, no hazardous waste goes out. I gave Mr. Barr copies of the old PTOs and my calculations (based on the last 3 years of usage) showing NewKor as a major source for VOCs and HAPs. Mr. Barr wants to meet again with Adrienne LaFavre, and expressed a couple times that she is acting as NewKor's consultant.

In response, I said that's fine, but I will be issuing a NOV based on actual numbers. Mr. Barr kept mentioning that they could reduce their methanol usage and no longer use that much. I tried to explain that NewKor had already used that much, but for future use, it was up to him how they are going to proceed.

Mr. Barr also mentioned that he had talked with a chemist and believes that 20% of the solvent mixture and 100% of the phenol is absorbed, but stated that no analytical testing has been done to verify that.

Solvent usage totaled 110.22 tpy for 2008 with methanol at 33.07 tpy. At 20% absorbed, VOC emissions from the solvent still equal 88.18 tpy and 26.46 tpy for methanol. As seen by the following: $110.22 \text{ tpy} \times (1 - 0.20) = 88.18 \text{ tpy}$, and $33.07 \text{ tpy} \times (1 - 0.20) = 26.46 \text{ tpy}$. Usage-based totals are provided in Attachment 6 of the inspection report.

It should be reiterated that during both facility visits, phenolic odors were very strong. I would even describe the odors as overwhelming in the drying room.

UPDATE: 1/14/2009

I haven't heard from Mr. Barr or Adrienne LaFavre since 1/6/2009.

UPDATE: 1/15/2009

I spoke with Adrienne LaFavre with OCAPP on 1/15/2009. She believes that 90% of the resin and solvent mixture may be absorbed and therefore not emitted, based on what a chemist at Georgia Pacific (GP) has told NewKor. They are waiting on documentation from GP with that information.

I spoke with Bryan Sokolowski who accompanied me on the NewKor inspection and who has also investigated NewKor odor complaints. We believe resin and solvent would absorb into the cardboard tubes if and when they come into contact with the tubes. There is definitely a huge amount of solvent continually evaporating that doesn't even touch the tubes during the actual submersion. The process itself is very open with exhaust fans, located inside the dipping room and the drying room, pulling the vapors from inside of the building directly to the outside without controls.

UPDATE: 1/16/2009

I've attached an email from Gordon Barr received on 1/16/2009 at 4:47 PM.

UPDATE: 1/21/2009

CDAQ received an email from Adrienne LaFavre stating that the alcohol (solvent) used is only a carrier in the process, and therefore, not absorbed. Email is attached.



MEMORANDUM:
Cleveland Division of Air Quality

UPDATE: 2/11/2009

In response to NewKor's corrective action plan (CAP), dated 2/4/2009, I spoke via telephone with Annette Kinder (9:10 am). The CAP stated that a decrease in methanol usage will allow them to submit PTIO applications by March 15, 2009 for P001 and P003, and by April 15, 2009 for P004. I informed Annette that the dates are acceptable, but that the PTIO application determination is not acceptable, based on the fact that CDAQ does not have supporting information.

UPDATE: 2/25/2009

CDAQ receives email from Adrienne LaFavre that NewKor is proposing to submit a Synthetic Minor permit application. However, Adrienne provides calculations that show OCs to be over 100 tpy (email attached).

In response, I call Adrienne and leave a message asking about the amount of OC. And, I send an email to Adrienne asking about the OC emissions.

UPDATE: 2/27/2009

Valencia White, my supervisor, calls and speaks to Adrienne LaFavre. Adrienne is in agreement that NewKor is a Title V facility.

Marantides, Andrew

From: Marantides, Andrew
Sent: Thursday, October 23, 2008 2:40 PM
To: 'Gordon Barr'
Subject: RE: Odor complaints NewKor

At the Cleveland Division of Air Quality we can definitely relate to multi-tasking and how it can affect timeliness. For this reason, we would like to make the meeting as productive as possible. Having the requested process information available before the meeting will help us meet our common goals. I would like to get the information requested and go over the details with Adrienne LaFavre from OCAPP before we have a meeting, if one will still be necessary.

Could you elaborate on what it means "to establish a baseline for the smell"? I think of that as the level that is normally present, but may fluctuate up or down. Finding common language to describe the odor is also important.

I would like to emphasize that all inspectors' observations and personal accounts point to NewKor as the source. The reason I requested the information is to try to determine if a small step in the batch process may be responsible (especially given the short time window of the occurrences). From conversations with Linda Kimmy, Andrew Kenney, Bryan Sokolowski, and Adrienne LaFavre, the odor appears to be originating in the ovens/drying room area. Details of the batch process may indicate why the odor is not present throughout the remainder of the process.

As for the complaints, I did forward NewKor's plant line number to the complainants (and they agreed to call you and the Cleveland Division of Air Quality for any future occurrences). The general area of the complaints is the residential development across the tracks from your facility.

I understand that this issue is not straightforward and not able to be solved overnight, and I appreciate your efforts. Please continue to work with myself, Adrienne LaFavre of OCAPP, and your staff. I suggest that once the requested information is submitted to myself and Adrienne, we can revisit having a meeting.

Andrew Marantides
Enforcement Specialist I
Cleveland Department of Public Health
Division of Air Quality
1300 East 9th Street, Cleveland, OH 44114
(Office) 216-420-8049 / (Fax) 216-420-8047
amarantides@city.cleveland.oh.us
www.clevelandhealth.org

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From: Gordon Barr [mailto:gbarr@newkor.com]
Sent: Thursday, October 23, 2008 12:51 PM
To: Marantides, Andrew
Cc: 'Adrienne LaFavre'
Subject: Re: Odor complaints NewKor

Dear Andrew and Adrienne,

We are gathering the information per both your requests. As a small company we have to wear many hats. We

10/23/2008

have to run very lean. The burden of gathering falls on me and Annette as we do our other jobs (as a result, we are really good at multi-tasking but not as timely as we would like sometimes!).

The success of remediating this issue is contingent on two issues:

- 1). Source of the odor
- 2). How weather patterns distribute the odor

There have had 6 complaints since July 29th, 2008 (roughly one complaint every 15 days). The hang time seems to be about 15-30 minutes. The event is random.

Adrienne, currently I possess scant information about the location of the complaint. We have little information about the weather conditions at the time of occurrence. We need to build our data base on this information to give you what you need. That might take two or three more complaints.

I would like to propose the following:

- 1). A "odor seminar" at NewKor with Andrew M, Andrew Kenny, Bryan Sokolowski, Chris Christly (my plant manager), Annette Kinder (my Office manager), and myself. The purpose of this is to establish a baseline for the smell that the six of us can agree on.
- 2). When a odor complaint is lodged, representatives from NewKor and the Cleveland EPA respond to the "general area" of the odor. All six of us don't have to respond, but a member(s) from each team should be present. We can monitor weather conditions and agree to the odors smell (if it is NewKor, that will be self evident, if it is someone else, we re-adjust the investigation). Unfortunately, the hang time of the odor seems to be brief (20-30 minutes). We would have to respond quickly, in a timely manner.
- 3). If the person lodging the complaint could call the EPA and our plant line (our plant line is manned 16 hours a day/ 216-631-5978) so we can respond to the general area in a timely manner that would increase our chances greatly of tracking back to the odor's origin. By hitting *67 the person calling NewKor would be masked and their anonymity maintained.

We welcome the opportunity to try and solve this by working as a team (NewKor and The Cleveland Department of Public Health). In any event, we have to build our data base to quantitatively move forward.

Andrew, how do the following dates look for you, Bryan and Andrew(K) for the "odor seminar"?

Friday 10-24-08 / 10:00-11:00 or 2:00-4:00

Monday 10-27-08/ 10:00-11:00 or 2:00-4:00

Wednesday 10-29-08 / 10:00-11:00 or 2:00-4:00

Sincerely yours,

Gordon Barr

----- Original Message -----

From: Marantides, Andrew

To: 'gbarr@newkor.com'

Cc: 'Adrienne LaFavre'

Sent: Wednesday, October 22, 2008 10:13 AM

Subject: Odor complaints

Good morning Gordon,

This is Andrew Marantides from the Cleveland Division of Air Quality. I have a few suggested steps to follow through with on this issue. After that point, if you would still like me to come out and meet with you and your staff, I would be more than happy to do so.

First, I would like to get more information about your batch process. Things like types and amounts of chemicals used and times of different activities (ovens, drying room, etc.) would be helpful. Also, how many batches are run per day?

Second, Adrienne LaFavre from OCAPP forwarded me the e-mail from Monday and I spoke with her this morning. She stated that she is waiting on more information from you in order to go ahead and run the modeling for your facility. It is our hope that once the modeling is complete, the appropriate actions to alleviate the problem will become more apparent.

Third, I do want to emphasize that this odor nuisance issue has been investigated by four different CDAQ inspectors who are in agreement that the odor is coming from NewKor. Not only were other nearby industries investigated without results, but the odor that has been present outside has matched what is present inside of NewKor. While it appears to be the ovens or possibly the drying room, all I can say is that the odor nuisance problem needs to be addressed. Also, science research has proven olfactory fatigue is seen in many cases - after working in certain conditions for long periods of time, your nose becomes desensitized to them.

Again, please give Adrienne LaFavre of OCAPP the required information as soon as you are able so she can get going on running a model. Also, try to get me some information about your batch process so that I can determine the origin of the problem.

We, here at the Cleveland Division of Air Quality, appreciate your cooperation in this matter. It is not a straightforward problem to address and understand the difficulties encountered in fixing the problem. We hope to have it all resolved soon for everyone's benefit. If you have any further questions or concerns or would like to meet some time in the future, please let me know.

Andrew Marantides
Enforcement Specialist I
Cleveland Department of Public Health
Division of Air Quality
1300 East 9th Street, Cleveland, OH 44114
(Office) 216-420-8049 / (Fax) 216-420-8047
amarantides@city.cleveland.oh.us
www.clevelandhealth.org

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No virus found in this incoming message.

Checked by AVG.

Version: 7.5.549 / Virus Database: 270.8.2/1739 - Release Date: 10/22/2008 7:23 AM

Marantides, Andrew

From: Marantides, Andrew
Sent: Wednesday, October 22, 2008 10:13 AM
To: 'gbarr@newkor.com'
Cc: 'Adrienne LaFavre'
Subject: Odor complaints

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www.clevelandhealth.org

Serving as Ohio EPA Agency 13 for Cuyahoga County

10/22/2008

Marantides, Andrew

From: Gordon Barr [gbarr@newkor.com]
Sent: Tuesday, October 21, 2008 5:38 PM
To: Bryan Sokolowski
Cc: Marantides, Andrew; Annette
Subject: Re: Recent air complaint

Dear Bryan and Andrew,

Thanks for the update. Like you we want to get to the origin of this odor. The intermittent nature of the odor makes it hard to identify its source. Bryan, I know I sound like a broken record but the odor we encountered when you and Andrew Kenny were out was not ours.

Please understand, I am not using denial as a tactic regarding the odor complaint. Like you, we want to see it resolved and move on.

Andrew, Bryan, would it be possible to sit down with you two and my management team, pool our ideas, and work together to define a "phase one" action plan on identifying the source of the odor? If it is us, that will become self evident. But honestly, it is not us.

The complaints seem to come every three or four weeks. On a daily basis, we drive around smell hunting. On Monday 10-20-08 we detected nothing. Maybe we missed the time window when the event occurred. The intermittent nature of the odor is frustrating.

It would be helpful when a complaint comes in if representatives from NewKor and EPA could meet as soon as possible to track the smell. A day after the fact gives us little to work with.

If the complainant wanted to call us directly so we could track the thing in real time it would be a big help. Our plant line is manned 16 hours a day. That number is 216-631-5978. We are willing to work carefully with our neighbors as we are in this together.

Location of the smell would be helpful (cross streets). Is it always the same place? We can look at prevailing winds.

The hang time of the odor would be helpful. From past reports, it seems to be about a half hour. I want to point out that we run our ovens 12 to 16 hours a day/ five days a week. If we produce the odor, where does it go the other 15 hours/ the other 20-30 days a month?

NewKor has been in business since 1972 and we have never had a complaint like this. Again, this is very confusing (for all of us).

We want to work with you to get to the root of this. We are free afternoons Thursday and Friday of this week and Monday or Wednesday of next week. Working together, I believe we can solve this mystery. We ask your help in this matter. We look forward to brainstorming with you to find the odor genesis and a solution.

Sincerely yours,

Gordon Barr

10/22/2008

----- Original Message -----

From: Bryan Sokolowski

To: 'annette@newkor.com'

Cc: Marantides, Andrew

Sent: Tuesday, October 21, 2008 11:16 AM

Subject: Recent air complaint

Hello Annette,

This is Bryan Sokolowski with the Cleveland Department of Air Quality. Andrew Kenney and I visited your facility on 10-2-2008, to investigate an air complaint that was called in earlier that day. Yesterday, 10-20-08 at 9:00 a.m., we received another odor nuisance complaint regarding the same smell that was involved in the last complaint on October 2nd. The complainant mentioned that the smell was worse than it has ever been. The reason for the email is to notify you that another complaint was called in and at what date and time it was called in at, in hopes that it might help NewKor and Adrienne LaFarve in pinpointing the cause of the odor. Andrew Marantides is the primary agent dealing with this case, but if you have any questions regarding this most recent complaint feel free to email or call me back at (216) 420-7663.

Thanks,

Bryan Sokolowski

No virus found in this incoming message.

Checked by AVG.

Version: 7.5.549 / Virus Databasc: 270.8.2/1735 - Release Date: 10/20/2008 2:52 PM

Marantides, Andrew

From: Marantides, Andrew
Sent: Friday, October 03, 2008 3:58 PM
To: 'Annette'
Cc: 'gbarr@newkor.com'; 'Adrienne LaFavre'; Kimmy, Linda; Andrew Kenney; Bryan Sokolowski
Subject: RE: Notice of Violation

Dear Annette, Gordon, and Adrienne,

The events that transpired today seem to have been misunderstood. Andrew Kenney and Bryan Sokolowski of the Cleveland Division of Air Quality did go out and inspect an odor complaint at NewKor as well as their neighbors, Metal Fab.

When inspecting NewKor, they matched the odor they smelled a block away with the odor existing within NewKor. **It is very important to note that it was never concluded that the odor originated from Metal Fab.** Based on wind direction, Gordon and the two inspectors did smell the odor in front of Metal Fab while walking down Berea Road. However, after leaving NewKor, the two inspectors entered Metal Fab thoroughly and did not find any odors present whatsoever.

It is clear that the odor is coming from NewKor. This problem still needs to be addressed by NewKor in order to not be in violation of City of Cleveland Codified Ordinance 277.08 and Ohio Administrative Code Rule 3745-15-07 for creating an air pollution nuisance.

Please contact me with any questions.

Andrew Marantides
Enforcement Specialist I
Cleveland Department of Public Health
Division of Air Quality
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amarantides@city.cleveland.oh.us
www.clevelandhealth.org

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From: Annette [mailto:annette@newkor.com]
Sent: Friday, October 03, 2008 3:12 PM
To: Marantides, Andrew
Subject: Fw: Notice of Violation

----- Original Message -----

From: Annette
To: Adrienne.LaFavre@epa.state.oh.us ; amarantides@city.cleveland.oh.us ; lkimmy@city.cleveland.oh.us
Sent: Friday, October 03, 2008 2:50 PM
Subject: Notice of Violation

Dear Andrienne, Linda, and Andrew,

10/3/2008

We just had two gentleman (Andrew Kenney, we did not get the second young man's name) from the Cleveland E.P.A here at Newkor. They said there was a complaint last night around 5:30-6:00 of odors coming from Newkor which prompted their visit.

We were informed by both men that they smelled the odor blocks away and it seemed to be coming from Newkor. Gordon Barr and the two reps walked through the plant. There was little NewKor odor and no odors that went beyond our plant. There was no NewKor odors outside NewKor's facility including both parking lots (east and west).

The three then walked down Berea Road. The smell they detected became very apparent as they walked past Metal Fab, NewKor's neighbor. Gordon and the two EPA reps found that the odor has been coming from Metal Fab and not Newkor. Andrew and the other Rep were going into Metal Fab for an inspection there.

We wanted to update you. Please keep us informed as this appears to resolve our involvement with the odor issue. We continue to work on the permitting. If you have any questions please let us know.

We also would like to thank you for your help with this matter. Thank you for sending the two men out.

Sincerely,

Annette Kinder
Office Manager
NewKor, Inc.

Marantides, Andrew

From: Marantides, Andrew
Sent: Tuesday, September 23, 2008 1:48 PM
To: 'Gordon Barr'
Subject: RE: Notice of Violation

Thanks for keeping me updated.

Andrew Marantides
(216) 420-8049
amarantides@city.cleveland.oh.us

From: Gordon Barr [mailto:gbarr@newkor.com]
Sent: Tuesday, September 23, 2008 1:40 PM
To: Marantides, Andrew
Cc: Adrienne.LaFavre@epa.state.oh.us
Subject: Notice of Violation

Dear Andrew,

We met with Adrienne LaFarve today at Newkor. She is starting the permitting process for us. She has two issues for other companies in the cue ahead of ours and estimates starting on ours next week. We are not sure how long the process will take but it will be done in a timely manner.

Adrienne will also be talking to the OCAP engineers regarding our random oven odor issue.

Andrienne also has our consent to obtain any information from you that she will need.

Thank you for your help as we address these matters.

Sincerely yours,

Gordon L. Barr

NewKor, Inc.

10410 BEREA ROAD
CLEVELAND, OHIO 44102
FAX (216) 631-7886
PHONE (216) 631-7800.

To: Andrew Marantides **From:** Annette Kinder
Fax: 1-216-420-8047 **Pages:** 4 (including cover)
Co: City of Cleveland/EPA
Phone **Date:** September 11, 2008
Re: Permits **CC:**

Urgent For Review Please Confirm Please Reply

Andrew,

Attached you will find the 2008 City of Cleveland Air Contaminant Source Permits for both of the dip tanks and ovens.

This should satisfy the third paragraph from the violation letter.

We appreciate your help in this matter.

Have a good day!

Thank You

Annette Kinder



City of Cleveland

Frank G. Jackson, Mayor

Department of Public Health
Division of Air Quality
1925 St. Clair Avenue
Cleveland, Ohio 44114-2080

2008 City of Cleveland Air Contaminant Source Permit

Newkor, Incorporated

Facility ID:

13-18-00-5362

Facility Location:

10410 Berea Road

Cleveland

Ohio

44102

Permission is hereby granted for the operation of the following air contaminant source:

P003 Midland Ross Gas Fired Batch Bake Oven 2.2. MM BTU/HR

This annual permit authorizes the operation of the air contaminant source or control equipment described above pursuant to Chapters 257 and 259 of the City of Cleveland Health Code. This permit does not authorize emissions of air contaminants in excess of City, State and/or Federal regulations; nor does it exempt the permittee from complying with any applicable requirements of other Departments of the City of Cleveland, State, or Federal Agencies. The Commissioner of Air Quality, or his or her authorized representative(s) may enter this premises at any reasonable time, when a source is being operated, or when a violation is believed to have occurred or believed to be occurring, for the purpose of making inspections, conducting tests, and/or examining records or reports pertaining to the air contaminant source or control equipment described above. This permit is subject to annual renewal, however, the Commissioner may require this permit to be renewed at an earlier date, as specified in Chapter 259.06 of the City of Cleveland Health

A handwritten signature in black ink, appearing to read 'R. Nemeth'.

Richard Nemeth
Commissioner
Division of Air Quality

This permit expires July 31, 2009.



City of Cleveland
Frank G. Jackson, Mayor

Department of Public Health
Division of Air Quality
1925 St. Clair Avenue
Cleveland, Ohio 44114-2080

2008 City of Cleveland Air Contaminant Source Permit

Newkor, Incorporated

Facility ID:

13-18-00-5362

Facility Location:

10410 Berea Road
Cleveland Ohio 44102

Permission is hereby granted for the operation of the following air contaminant source:

P001 Midland Ross Gas Fired Batch Bake Oven 2.2. MM BTU/□HR

This annual permit authorizes the operation of the air contaminant source or control equipment described above pursuant to Chapters 257 and 259 of the City of Cleveland Health Code. This permit does not authorize emissions of air contaminants in excess of City, State and/or Federal regulations; nor does it exempt the permittee from complying with any applicable requirements of other Departments of the City of Cleveland, State, or Federal Agencies. The Commissioner of Air Quality, or his or her authorized representative(s) may enter this premises at any reasonable time, when a source is being operated, or when a violation is believed to have occurred or believed to be occurring, for the purpose of making inspections, conducting tests, and/or examining records or reports pertaining to the air contaminant source or control equipment described above. This permit is subject to annual renewal, however, the Commissioner may require this permit to be renewed at an earlier date, as specified in Chapter 259.06 of the City of Cleveland Health

A handwritten signature in black ink, appearing to read 'R. Nemeth'.

Richard Nemeth
Commissioner
Division of Air Quality

This permit expires July 31, 2009.

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NEWKOR

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City of Cleveland

Frank G. Jackson, Mayor

Department of Public Health
Division of Air Quality
1925 St. Clair Avenue
Cleveland, Ohio 44114-2080

2008 City of Cleveland Air Contaminant Source Permit

Newkor, Incorporated

Facility ID:

13-18-00-5362

Facility Location:

10410 Berea Road
Cleveland Ohio 44102

Permission is hereby granted for the operation of the following air contaminant source:

P004 2 Dip Tanks For Resin Application On Paper Rolls

This annual permit authorizes the operation of the air contaminant source or control equipment described above pursuant to Chapters 257 and 259 of the City of Cleveland Health Code. This permit does not authorize emissions of air contaminants in excess of City, State and/or Federal regulations; nor does it exempt the permittee from complying with any applicable requirements of other Departments of the City of Cleveland, State, or Federal Agencies. The Commissioner of Air Quality, or his or her authorized representative(s) may enter this premises at any reasonable time, when a source is being operated, or when a violation is believed to have occurred or believed to be occurring, for the purpose of making inspections, conducting tests, and/or examining records or reports pertaining to the air contaminant source or control equipment described above. This permit is subject to annual renewal, however, the Commissioner may require this permit to be renewed at an earlier date, as specified in Chapter 259.06 of the City of Cleveland Health

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Richard Nemeth
Commissioner
Division of Air Quality

This permit expires July 31, 2009.