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

CERTIFIED MAIL
7002 2030 0001 1807 8085
RETURN RECEIPT REQUESTED

SERVING OHIO EPA AS
AGENCY 13 FOR CUYAHOGA
COUNTY

June 1, 2009

Gordon L. Barr
NewKor, Inc.
10410 Berea Road
Cleveland, Ohio 44102

Dear Mr. Barr:

The Cleveland Division of Air Quality (CDAQ) has received an application for an Ohio Permit to Install/Operate (PTIO) from NewKor, Inc. located in Cleveland, Ohio. Our technical review of this application has determined that the application cannot be processed. Consequently, the application is being returned to NewKor, Inc. for the reason noted below.

The paper coating operation described in the application exceeds the limit established in Ohio Administrative Code rule 3745-21-09(F). This rule establishes an allowable emission limit of 2.9 pounds of VOC per gallon of coating, excluding water and exempt solvents. Currently, NewKor, Inc. is using coatings that exceed this limitation. There are options available that may allow you to achieve compliance with the 21-09(F) rule including: use of compliant coatings; daily volume weighted average; or add-on controls.

Please submit a revised PTIO application for these coating operations that demonstrates compliance with applicable air pollution rules. This application must be submitted through Ohio EPA's eBusiness Center within 60 days of receipt of this letter.

If you would like to further discuss the compliance requirements described in this letter either over the phone, or in person, please feel free to contact me at 216-664-3540.

Sincerely,

Lawrence M. Maline, Jr.

Environmental Compliance Specialist
Cleveland Division of Air Quality

Enclosure
cc: Valerie Shaffer, CDAQ Enforcement

Georgia Pacific Chemicals LLC

Tel: 770-593-6800 Fax: 770-322-9973 www.gp.com

GP 5101

Product Data Sheet

Typical Properties	
Appearance	Light amber liquid
Viscosity, cPs @25C	340 – 470
% Water, by KF	5.0 – 11.0
pH	7.8 – 8.2
% Free Formaldehyde	Less than 0.5%
% Free Phenol	8.5 – 11.5%
% Non-Volatiles@135°C	64.0 -66.0
Storage Temperature	10 – 15C

Georgia-Pacific Chemicals

NFPA Ratings
Flammability
Health 2 3 1 Reactivity
Specific

Material Safety Data Sheet

GP® 5101 TYBON® Phenolic Saturating Resin

Section 1. Chemical Product and Company Identification

Product / Trade Name	GP® 5101 TYBON® Phenolic Saturating Resin
Synonyms	RPPF 5101
Chemical Family	Phenol-Formaldehyde Resin
Chemical Formula	$(C_6H_6O \cdot CH_2O)_x$
Manufacturer	**Georgia-Pacific Chemicals LLC** 2883 Miller Road Decatur, GA 30035 (770) 593-6874 (Non-Emergency)
Emergency Phone (24 hours):	**CHEMTREC 1-800-424-9300**

Section 2. Composition and Information on Ingredients

Hazardous Components	CAS #	% by Weight	ACGIH TLV™	OSHA PEL
Methanol	67-56-1	25.0 max.	TWA: 200 ppm STEL: 250 ppm [skin]	TWA: 200 ppm
Phenol	108-95-2	11.5 max.	TWA: 5 ppm [skin]	TWA: 5 ppm [skin]
Formaldehyde	50-00-0	< 0.5	CEIL: 0.3 ppm	TWA: 0.75 ppm STEL: 2 ppm

[skin] This notation indicates that absorption through skin can contribute significantly to overall exposure.
TWAs are 8 hour exposures unless otherwise noted. STELs are 15 minute exposures unless otherwise noted.

Section 3. Hazards Identification

HMIS

Health Hazard	2
Fire Hazard	3
Reactivity	1
Personal Protection	

Note: Personal protective equipment (PPE) is related to conditions of use. Determination of PPE is the responsibility of the employer. Refer to *Section 8* **(Exposure Controls / Personal Protection)** of this MSDS for recommendations.

Emergency Overview Light amber to brown liquid; alcohol-phenolic odor.

WARNING! Flammable liquid. Keep away from heat, sparks, and flames. Vapors can travel to a source of ignition and flash back. Unvented containers may develop pressure on prolonged exposure to heat. Eye irritation or injury may result from exposure to this product. Prolonged contact may cause skin irritation.

Continued on Next Page

Effective Date: 12/09/2004

Potential Health Effects

Eye contact	Contact with liquid or mist can cause severe eye irritation or injury. Vapors released from product can cause severe eye irritation. Symptoms may include redness, watering, itching, or a burning sensation in the eyes.
Skin Contact	A prolonged single exposure may produce mild to moderate skin irritation. Symptoms may include itching, scaling, cracking, reddening, or blistering at the site of contact.
Inhalation	This product is not expected to be toxic by inhalation. However, prolonged inhalation of vapors released from hot or curing product may be irritating to the nose, throat, and lungs. Symptoms may include coughing or shortness of breath, nausea, headaches, dizziness or drowsiness.
Ingestion	Not expected to be orally toxic. In normal industrial use, ingestion is not considered a probable route of exposure.
Chronic	This product contains formaldehyde which may cause cancer. Repeated or prolonged exposure to formaldehyde may cause skin sensitization, dermatitis, or other allergic reactions. The degree of sensitivity varies with individuals.
	This product contains ingredients which may affect the following target organs: **Respiratory system, eyes, skin, nervous system, kidneys, liver, gastrointestinal tract**
	See *Section 11* Toxicological Information for additional information.

Section 4. First Aid Measures

Eye contact	Immediately rinse with water. Remove contact lenses. Hold eyelids apart and flush eyes with water for at least 15 minutes. Get immediate medical attention.
Skin Contact	Remove contaminated clothing. Wash skin thoroughly with soap and water. Get medical attention if irritation persists. Launder contaminated clothing before reuse.
Inhalation	Remove to fresh air. Rest in half-upright position. Get medical attention if necessary.
Ingestion	If conscious, immediately rinse mouth and give large quantities of water. Get immediate medical attention. Never give anything by mouth to an unconscious person.

Section 5. Fire and Explosion Data

Fire Hazards	**Flammable liquid.** Keep away from heat, sparks, open flame, or other ignition sources.		
Flash Point	approximately 69°F (20.5°C) [Pensky-Martens Closed Cup]		
Flammable Limits (% by volume)	Methanol	LOWER: 6	UPPER: 36.5
Extinguishing Media	Use alcohol foam, carbon dioxide, or dry chemical.		
Fire Fighting Instructions	Use self contained breathing apparatus and protection for skin. Use water spray to cool fire exposed containers. Stay away from ends of container.		
Combustion Products	Irritating fumes and toxic gases.		
Special Hazards	• CAUTION: Vapors can travel to a source of ignition and flash back. • Hazardous polymerization may take place if exposed to fire conditions. • Unvented containers can build up pressure if exposed to heat (fire) and rupture violently. • Water runoff can cause environmental damage. Dike and collect water used to fight fire.		

Section 6. Accidental Release Measures

Spill and Leak Procedures

- Turn off all sources of heat or ignition.
- Stop leak if you can do so without risk.
- Ventilate area with explosion-proof equipment.
- Use PPE appropriate to spill size and risk of exposure.
- Confine spillage and absorb on earth, sand, or other non-combustible absorbent material.
- Retain all contaminated water for removal and treatment. DO NOT flush to sewer.

Section 7. Handling and Storage

Handling

- Flammable liquid. Avoid contact with eyes, skin, and clothing. Use proper protective equipment. (see *Section 8*)
- Avoid breathing mist or vapor. Use only in a well ventilated area.
- Ground and bond containers when transferring material. Use explosion-proof pumps.
- Unvented containers may develop pressure. Open with caution.
- Wash thoroughly after handling.
- Eyewash stations and safety showers should be easily accessible to areas where product is used.

Storage

- Keep away from heat, sparks, open flame, or other sources of ignition.
- Do not store portable containers in direct sunlight.
- Keep containers closed when not in use.
- For maximum storage life, store at temperatures below 50°F (10°C).
- Protect from freezing.
- Store away from incompatible materials. (see *Section 10*)

Section 8. Exposure Controls / Personal Protection

Personal Protective Equipment (PPE)

Eyes and Face: Face shield with safety glasses or chemical safety goggles.

Skin: Rubber or neoprene gloves. Wear additional protective clothing as appropriate to protect skin. Chemical resistant apron or other impervious clothing.

Respiratory: If feasible engineering controls do not prevent overexposure, a full-face respirator with cartridges approved by NIOSH/MSHA for formaldehyde, organic vapors, and dusts/mists may be used only when exposure levels are known to be within the unit's capability.
Use a positive pressure air supplied respirator if there is any potential for an uncontrolled release, exposure levels are not known, or in any situation where air purifying respirators may not provide adequate protection.

Engineering Controls

Use ventilation as necessary to keep exposure to airborne contaminants below the exposure limits. Use explosion-proof ventilation equipment.

Section 9. Physical and Chemical Properties

Physical appearance	Light amber to brown liquid
Odor	alcohol-phenolic
pH (as is)	approximately 8.0
Boiling Point	approximately 171°F (77.2°C)
Melting Point	not applicable
Specific Gravity (25°C)	approximately 1.12
Vapor Pressure (mm Hg)	not available

Continued on Next Page

Vapor Density	not available
% Volatile (w/w)	approximately 35%
Solubility in Water	insoluble

Section 10. Stability and Reactivity Data

Chemical Stability	This product is stable under the recommended storage conditions.
Conditions to Avoid	Avoid storage in unagitated bulk containers. Avoid storage at temperatures above 80°F (26.7°C). (see *Section 7*)
Incompatibility with Other Materials	Avoid contact or contamination with strong oxidizers, acids, modified phenols (*e.g.* resorcinols, cresols) and isocyanates.
Hazardous Decomposition Products	None known.
Hazardous Polymerization	Unagitated, bulk material may slowly exotherm when stored at temperatures above 80°F (26.7°C). These conditions may result in hazardous exothermic polymerization at temperatures above 104°F (40.0°C), or if mixed with incompatible materials.
Special Remarks	Elevated storage temperatures will shorten product storage life. Product may darken with time.

Section 11. Toxicological Information

Eye	A similar product was a severe eye irritant when tested as described in 29 CFR 1910.1200, Appendix A (OSHA Hazard Communication Standard).
Dermal	The effects of skin exposure to this product are not known. This product may be a skin irritant but is not expected to be dermally toxic.
Inhalation	A similar product was not toxic by inhalation when tested as described in 29 CFR 1910.1200 , Appendix A (OSHA HCS).
Oral	A similar product was not orally toxic when tested as described in 29 CFR 1910.1200, Appendix A (OSHA HCS).
Subchronic Effects	Exposure to formaldehyde may cause temporary irritation to the nose and throat and may lead to respiratory disorders. However, in a thorough review of sensory/respiratory irritation studies of formaldehyde from the standpoint of occupational exposure, an expert panel has observed that exposure to concentrations of 0.3 ppm or lower failed to produce irritation. Individuals, in general, do not report irritation until concentrations reach 0.5 - 1 ppm. Respiratory disorders studies have concluded the threshold for long-term exposures causing chronic pulmonary effects is between 0.4 and 3 ppm and chronic obstructive pulmonary disease is 2 ppm. Additionally, persons with asthma responded no differently than healthy individuals at concentrations as high as 3 ppm. Pre-existing respiratory disorders may be aggravated by exposure.
Chronic Effects	
Carcinogenicity	The International Agency for Research on Cancer (IARC) classifies formaldehyde as a carcinogen. This classification is based on the increased occurrence of a rare cancer of the nasopharyngeal cavity. IARC determined that there was insufficient evidence of other cancers including cancer of the oral cavity, oro- and hypopharynx, larynx, lung, sinonasal cavity, pancreas, brain and leukemia. The National Toxicology Program (NTP) includes formaldehyde in its Annual Report on Carcinogens. OSHA regulates formaldehyde as a potential carcinogen for exposures at or exceeding 0.5 ppm.
Target Organs	See *Section 3.*

Continued on Next Page

Section 12. Ecological Information

Ecotoxicity	This product is biodegradable under aerobic and anaerobic conditions.

Section 13. Disposal Considerations

Waste Disposal	Dispose of absorbed material in accordance with all federal, state, and local regulations. Dispose of contaminated water in a contained waste treatment system.
RCRA	This product has a flash point less than 140°F. Upon disposal, it would be considered a hazardous waste exhibiting the characteristic of ignitability (Hazardous Waste No. D001). **Note:** If this product is altered, it is the responsibility of the user to determine whether the material meets the criteria for hazardous waste at the time of disposal.

Section 14. Transportation Information

DOT Regulated as indicated below.

Shipping Description	Rail Cars & Tank Trucks	Tote-bin Quantities or Less
Proper Shipping Name	Resin solution	Resin solution
Hazard Class	3	3
Identification Number	UN 1866	UN 1866
Packing Group	II	II
Reportable Quantities	RQ (Methanol, Phenol, Formaldehyde)	Not applicable.
Placards / Labels	**Placards:** Flammable.	**Labels:** Flammable liquid
Special Provisions for Transport	None.	When shipping by air, consult the IATA regulations.

Section 15. Regulatory Information

Federal Regulations ***The following regulations may have reporting requirements for the components listed. See "Key to Abbreviations and Acronyms" under Section 16 for definitions.***

CERCLA / SARA Emergency Reporting

A spill or release of this material may trigger the emergency release reporting requirements under CERCLA (40 CFR Part 300) and/or SARA Title III (40 CFR Part 355). State or local reporting requirements may differ from federal requirements. Consult counsel for further guidance on your responsibilities under these laws.

Methanol, Phenol, Formaldehyde

SARA Title III Section 313 Supplier Notification

This product is known to contain the following chemicals which are listed in 40 CFR 372.65 as toxic chemicals requiring notification. This information must be included in all MSDS's that are copied and distributed for this product.

Component	CAS #	% by Weight
Methanol	**67-56-1**	**25.0 max.**
Phenol	**108-95-2**	**11.5 max.**
Formaldehyde	**50-00-0**	**< 0.5**

CWA Section 307

The following chemicals are listed under Section 307 as toxic pollutants not eligible for waiver from best available technology economically achievable (BAT) effluent limitations.

Phenol

Continued on Next Page

CWA Section 311	The following chemicals are listed under Section 311 as hazardous substances requiring the submission of a National Pollutant Discharge Elimination System (NPDES) permit application to EPA. **Phenol, Formaldehyde**
TSCA	All components of this product are listed on the Toxic Substances Control Act Inventory or are excluded from listing requirements.
Other Regulations	See the OSHA Formaldehyde Standard 29 CFR 1910.1048 for worker training, workplace monitoring, and medical surveillance requirements. California Safe Drinking Water and Toxic Enforcement Act (Proposition 65): This product contains the following substance(s) known to the State of California to cause cancer: **Formaldehyde** Canada: All components of this product are listed on the Canadian Domestic Substances List (DSL) or otherwise comply with CEPA new substance notification requirements.

Section 16. Other Information

FDA Status	Not applicable.
Other Special Considerations	**CAUTION:** Empty containers may contain product residue. Continue to observe recommended safety precautions when handling empty containers.
Supersedes Date	All Previous
Section(s) Changed Since Last Revision	11. Toxicological Information
Key to Abbreviations and Acronyms	ACGIH - American Conference of Governmental Industrial Hygienists ANSI - American National Standards Institute CEIL - Ceiling value CERCLA - Comprehensive Environmental Response, Compensation, and Liability Act CFR - Code of Federal Regulations CWA - Clean Water Act DOT - Department of Transportation FDA - Food and Drug Administration HCS - Hazard Communication Standard HMIS - Hazardous Materials Information System IARC - International Agency for Research on Cancer LC_{50} - The concentration of a material expected to kill 50% of an animal test group. LC_{LO} - Lowest lethal concentration of a substance LD_{50} - The dose of a material expected to kill 50% of an animal test group. LD_{LO} - Lowest lethal dose of a material MSHA - Mine Safety and Health Administration N.O.S. - Not Otherwise Specified NFPA - National Fire Protection Association NIOSH - National Institute for Occupational Safety and Health NTP - National Toxicology Program OSHA - Occupational Safety and Health Administration PEL - Permissible Exposure Limit (OSHA) RCRA - Resource Conservation and Recovery Act RQ - Reportable Quantity SARA - Superfund Amendments and Reauthorization Act STEL - Short Term Exposure Limit TLV - Threshold Limit Value (recommended by ACGIH) TSCA - Toxic Substances Control Act TWA - Time Weighted Average

Continued on Next Page

IMPORTANT:

This MSDS was prepared and is to be used only for this product in its present form. If this material is altered or used as a component in another material, the information on this MSDS may not be applicable. This document is generated for the purpose of distributing health, safety, and environmental data. It is not a specification sheet nor should any displayed data be construed as a specification. Some of the information presented and conclusions drawn herein are from sources other than direct test data on the product.

This information and the data herein are believed to be accurate and have been compiled from sources believed to be reliable. It is offered for your consideration, investigation, and verification. Buyer assumes all risk of use, storage, and handling of the product in compliance with applicable federal, state, and local laws and regulations.
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Georgia-Pacific will not be liable for claims relating to any party's use of or reliance on information and data contained herein regardless of whether it is claimed that the information and data are inaccurate, incomplete, or otherwise misleading.

NewKor, Inc.

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

To:	**Valerie Shaffer**	**From:**	Annette Kinder
Fax:	1-216-420-8047	**Pages:**	3(including cover)
Co:			
Phone		**Date:**	April 17, 2009
Re:	Chemical Solvents	**CC:**	

☐ **Urgent** ☑ **For Review** ☐ **Please Confirm** ☐ **Please Reply**

Hi Valerie,

Attached is the Chemical Solvents invoice and all the paperwork pertaining to the blend we recently received.

Please let me know if you need anything else.

Have a good day!

Annette Kinder

80% Methanol Solution
Shipment Rec'd
4/16/09

INVOICE

Innovative Solutions for Industry and the Environment

Chemical Solvents, Inc.

TELEPHONE
(216) 741-9310

FAX
(216) 741-4080

TOLL FREE
(800) 362-0693

3751 JENNINGS RD.
CLEVELAND, OH 44109

REMIT TO
P.O. BOX 931705
CLEVELAND, OH 44193-1113

CUST. NO:	647123
INV. NO	201985
INV. DATE:	04/06/09
SHIP DATE:	04/06/09
B/L NO:	262353

CHEMICAL SOLVENTS SHOWS ITS COMMITMENT TO RECYCLING BY USING RECYCLED PAPERS

SOLD TO
NEWKOR
10410 BEREA ROAD
CLEVELAND, OH 44102

SHIP TO
NEWKOR
10410 BEREA ROAD
CLEVELAND, OH 44102

CUSTOMER	ORDER NO.	FREIGHT CHARGES	SHIPPED VIA	SALESMAN	TERMS
RBAL ANNETTA		PREPAID	OUR TRUCK	130	NET 15 DAYS

UNITS ORDERED	PRODUCT CODE	DESCRIPTION	BILLING UNITS	UNIT PRICE	AMOUNT
2990.88	N928	NEWKOR 92/8 ALCOHOL SOLUTION	2991G	3.4500	10318.5
		SUBTOTAL			10318.5
		TAX STATUS N/A			.0
		FUEL SURCHARGE			20.0

4.9.09

SELLER REPRESENTS THAT WITH RESPECT TO THE PRODUCTION OF THE ARTICLES COVERED BY THIS INVOICE IT HAS FULLY COMPLIED WITH THE PROVISIONS OF THE FAIR LABOR STANDARDS ACT OF 1938, AS AMENDED.

TOTAL DUE 10338.5

A FINANCE CHARGE OF 1.5% PER MONTH (10% ANNUAL RATE) WILL BE ASSESSED TO BALANCE OVER 30 DAYS. ALL RETURNED MATERIAL SUBJECT TO 20% HANDLING CHARGE.

CUSTOMER COPY

Innovative Solutions for Industry and the Environment

Chemical Solvents, Inc.

CERTIFICATE OF ANALYSIS

PRODUCT DESIGNATION: Newkor 92/8 Alcohol Solution

QUANTITY: 3000 GALLONS
CUSTOMER: NEWKOR
CUSTOMER ORDER NO.: VERBAL-Annetta

CODE #: N928
REVIEWED: 04/3/09

DATE SHIPPED: 4-6-09
LOCATION: CLEVELAND, OH
INVOICE NO.: 262353
LOT NO. 040309
SAMPLE NO.: D09-121
TOTE NO.:

THIS IS TO CERTIFY RECORDS ARE ON FILE FOR THE ABOVE REFERENCED SHIPMENT OF TESTS TO INDICATE COMPLIANCE WITH APPLICABLE SPECIFICATIONS AND TO CERTIFY MATERIALS USED IN THE ABOVE SHIPMENT ARE ORIGINAL MANUFACTURER SOLVENTS AND ARE NOT RECYCLED SOLVENTS.

TEST	TEST METHOD	SPECIFICATION	RESULTS
ASSAY:	G.C.		
Isopropanol			92%
Methanol			8%
WATER CONTENT:	ASTM D 1364	1.0% MAX	0.35%
COLOR, PT.-CO.:	ASTM D 1209	10 MAX.	0
APPEARANCE:	Visual	Clear, Free of Particles	Pass

This document constitutes the only warranty of the product made by CHEMICAL SOLVENTS INC. CHEMICAL SOLVENTS INC. makes no other warranties, expressed or implied warranties of merchantability or fitness for any particular purpose. The determination of the suitability, compatibility and use of this product is your sole responsibility

DATE: April 3, 2009 SIGNATURE: Kay Lesesne

04/17/2009 00:47 21663178[illegible] NEWKOR PAGE 04/04

This Shipping Order must be legibly filled in, in Ink, in Indelible Pencil, or in Carbon, and retained by the Agent.

PAGE 1 OF 1

Chemical Solvents, Inc.

TELEPHONE (216) 741-9310
FAX (216) 741-4080
TOLL FREE (800) 362-0693
3751 JENNINGS RD. CLEVELAND, OH 44109

ORDER DATE: 04/01/09
B/L NUMBER: 262353

SHIP TO
NEWKOR
10410 BEREA ROAD
CLEVELAND, OH 44102

SOLD TO
NEWKOR
10410 BEREA ROAD
CLEVELAND, OH 44102

CUSTOMER NO.	SALESMAN	OPERATOR	REQ. NO.	SHIPPED VIA	SHIP DATE REQUESTED
647133	1130	KKES		OUR TRUCK	04/06/09

CUST. ORDER NO.	WHSE	FRT. PPD. ADD/COLLECT	FOB REMARKS
VERBAL ANNETTA	11	PREPAID	

QUANTITY	BACK ORDERED	PRODUCT CODE	HM	DESCRIPTION	WEIGHT	FRT CLASS
3000 GL COMP'S 1/3		N928	X	ISOPROPANOL SOLUTION 3,UN1219,PGII NAERG# 129 NEWKOR 92/8 ALCOHOL SOLUTIO 1 CARGO TANK TRUCK		

TOTAL NET WEIGHT:

****
216-631-7800 CONTACT: BARB HORVATH
* GC & CERT TO BE FAXED OR SENT WITH DRIVER *
* STANDARD EQUIPMENT W/60' HOSE *
* JOHN PAVLISH MUST GIVE FINAL APPROVAL OF ALL SHIPMENTS.
DRIVER ENTER GATE JUST PAST METAL FAB. TANK IS IN THE BACK
OF BUILDING NEXT TO THE DOCK. FULL IN.
****

NOTE - Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property.
The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding:
$ _____ per _____

This is to certify that the above-named materials are properly classified, described, packaged, marked and labeled and are in proper condition for transportation according to the applicable regulations of the Department of Transportation.
Keith Brennan 4/3/09
Signature

Subject to Section 7 of the conditions, if this shipment is to be delivered to the consignee without recourse on the consignor, the consignor shall sign the following statement:
The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges.
(Signature of Consignor)

FOR CHEMICAL EMERGENCY PHONE NUMBER 1-800-424-9300

RECEIVED, subject to the classifications and lawfully filed tariffs in effect on the date of the issue of this Bill of Lading, the property described above in apparent good order, except as noted (contents and condition of contents of packages unknown), marked, consigned, and destined as indicated above which said carrier (the word carrier being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its route, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed as to each carrier of all or any of said property over all or any portion of said route to destination and as to each party at any time interested in all or any said property, that every service to be performed hereunder shall be subject to all the bill of lading terms and conditions in the governing classification on the date of shipment.
Shipper hereby certifies that he is familiar with all the bill of lading terms and conditions in the governing classification and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.

SHIPPER	CARRIER		COD Amt: $
LOADED BY: Keith	PLACARDS OFFERED DRIVER PLEASE INITIAL.	PLACARDED ☐ NAME OF PLACARD	FREIGHT CHARGES If charges are to be prepaid, write or stamp here, "TO BE PREPAID."
DELIVERED BY: Kenny	AGENT		CONSIGNEE CERTIFIES THAT THE ABOVE DESCRIBED LOAD IS B UNLOADED UNDER CONSIGNEES DIRECTION AND/OR SUPERVI IF A BULK LOAD CHEMICAL SOLVENTS TRUCK IS PROPI CONNECTED TO THE CORRECT LINES AND TANK, THAT ALL NECES VALVES ARE PROPERLY LINED UP AND THAT THE TANK TO W CHEMICAL SOLVENTS TRUCK IS CONNECTED HAS SUFFIC CAPACITY TO RECEIVE THE LOAD. P.T.O.
U-43/T-3	PER		CONSIGNEE RECEIVED
	TOTAL NO. OF PACKAGES REC'D.		

CHEMICAL SOLVENTS, INC.

"This is to certify that the above materials are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation, according to the applicable regulations of the Department of Transportation."

*MARK WITH "X" TO DESIGNATE HAZARDOUS MATERIALS AS DEFINED IN TITLE 49 OF FEDERAL REGULATIONS.

CALCULATIONS FOR
NEWKOR, INC.

NewKor, Inc. manufactures the core of paint rollers. The core is made from ~~tape~~ paper which is wound and glued together with an adhesive (Evans Adhesive 08032). After being formed, the core is soaked in a phenolic resin (Georgia-Pacific Chemicals GP 5101 RESI-MIX Plywood Adhesive) and alcohol (Chemical Solvents Newkor Blend N92.5/7.5 co nsisting of 92. 5% isopropanol and 7.7% methanol). The resin and alcohol are contained in a double dip tank system. Each tank is 4,000 gallons. The tanks measure 46"x70" and 76" deep. The tanks are filled about once a month. The dip tanks are permitted as P004.

After soaking in the tanks, the cores are air dried for two days and then undergo curing in an oven. Curing consists of a 2-3 hour oven dry followed by a 3 hour bake. NewKor, Inc. has two shifts for five days per week for 52 weeks per year. There are two ovens permitted as P001 and P002. They are identical Midland Ross 2.2 million BTU gas fired ovens. Ovens are used equally.

The primary pollutants are phenols from the resin, methanol and isopropyl from the alcohols. The alcohol evaporates in the dip room and drying room. It has evaporated fully before the tubes go into the ovens. The phenol is emitted during the oven curing process. During 2008, NewKor, Inc. used 232,960 pounds of resin (116.48 ton/yr) and 220,435 pounds of alcohol (110 ton/yr).

Chemical Solvents Newkor Blend N92.5/7.5 consists of 7.5% methanol and 92.5% isopropyl alcohol. Georgia-Pacific Chemicals GP 5101 TYBON Phenolic Saturating Resin (GP 5101) contains phenol (11.5%) and formaldehyde (<0.5 %). MSDS are attached for each of these materials. This mixture is absorbed into the fibrous walls of the tubes. When the tubes are baked, the phenolic resin is thermoset into a material called Bakelite.

Calculations for emissions based on 2008 material usage leads to NewKor requiring a Title V permit. These are below.

	(amount of resin)	(% emitted)[1]	(% phenol, formaldehyde or alcohol)	
Emissions of resin =	(116.48 ton/yr)	(0.35)	(0.115)	= **4.7 ton/yr**
Emissions of formaldehyde	(116.48 ton/yr)	(0.35)	(0.005)	= **0.2 ton/yr**
Emissions of alcohol	(116.48 ton/yr)	(0.35)	(0.25)	= **10.2 ton/yr**

	(amount of alcohol)	(% emitted)	(% methanol or isopropyl)	
Emissions of methanol	(110 ton/yr).	(100%)	(0.075)	= **8.25 ton/yr**
Emissions of isopropanol	(110 ton/yr)	(100%)	(0.92.5	= **102 ton/yr**

Total emissions of VOC = 125.35 ton/yr with 12.95 HAPS

[1]The percent volatile is 35%. For these calculations, it will be assumed all the phenol volatilizes.

NewKor would like to apply for a synthetic minor permit, emitting less than 100 ton/year of volatile organic compounds and less than 25 ton/year of Hazardous Air Pollutants (HAP) with less than 10 ton/year of any individual HAP. Therefore the calculations are based on using 25% less material. This is possible because NewKor has had a decrease in business.

NewKor is actively looking into material changes which will lead to lower alcohol emissions. The goal is to have these changes in place before business increases. Lowering alcohol emissions will allow for more material to be processed.

Calculations for emissions for the permit application are below.

From resin

(amount of resin) (% emitted)[1] (% phenol, formaldehyde or alcohol)

Emissions of phenol = (88 ton/yr) (0.35) (0.115) = **3.5 ton/yr**
Emissions of formaldehyde (88 ton/yr) (0.35) (0.005) = **0.15 ton/yr**
Emissions of isopropyl (88 ton/yr) (0.35) (0.25) = **7.7 ton/yr**

From added alcohol

(amount of alcohol) (% emitted) (% methanol or isopropyl)

Emissions of methanol (88 ton/yr). (100%) (0.075) = **6.6 ton/yr**
Emissions of isopropyl (88 ton/yr) (100%) (0.92.5 = **81.4 ton/yr**

Total phenol = 3.5 ton/yr
Total formaldehyde = 0.15 ton/yr
Total methanol = 6.6 ton/yr
Total isopropyl = 89.1
Total alcohol = 95.7 ton/yr
Total emissions of VOC = 99.35 ton/yr with 10.25 Total HAPS

[1]The percent volatile is 35%. For these calculations, it will be assumed all the phenol volatilizes.

Emission Unit	Compound	Emission (lb/hr)	Emission (ton/yr) at 8760 hr/year	Emission (ton/yr) at 4160* hr/yr
P001, P002	Phenol	1.68**	7.4**	3.5**
P001, P002	Formaldehyde	0.07**	0.3**	0.15**
P001, P002	Total HAPs	1.75**	7.7**	3.65**
P001, P002	Total VOC	1.75**	7.7**	3.65**
P004	Methanol	3.17	13.9	6.6
P004	Isopropyl	42.84	187.6	89.1
P004	Total HAPs	3.17	13.9	6.6
P004	Total VOC	46.01	201.5	95.7

*16 hour/day, 5 day/week, 52 week/yr
**on the application these emissions are divided by 2, half for each oven

The alcohols are emitted during the dipping and drying process. These air emissions will be included with unit P004. The phenol and formaldehyde are emitted during the baking process. These will be included in the air emissions for units P001 and P002.

PTI/PTIO Application A0037248
NEWKOR, INC.
1318005362
April 14, 2009

Division of Air Pollution Control

Application for Permit-to-Install or Permit-to-Install and Operate

This section should be filled out for each permit to install (PTI) or Permit to Install and Operate (PTIO) application. A PTI is required for all air contaminant sources (emissions units) installed or modified after January 1, 1974 that are subject to OAC Chapter 3745-77. A PTIO is required for all air contaminant sources (emissions units) that are not subject to OAC Chapter 3745-77 (Title V). See the application instructions for additional information.

For OEPA use only:				
	☐	Installation	☒	Request Federally enforceable restrictions
	☐	Modification	☐	General Permit
	☒	Renewal	☐	Other

1. Please summarize the reason for this permit application. This text will be in the public notice that will appear in the newspaper of the county where the facility is located.

   Newkor, Inc. is applying for a renewal of PTI/PTIO application to continue to do business as a manufacturer of paper and phenolic products.

   Is the purpose of this application to transition from OAC Chapter 3745-77 (Title V) to OAC Chapter 3745-31 (PTIO)?

   No

2. **Establish PER Due Date** - Select an annual Permit Evaluation Report (PER) due date for this facility (does not apply to facilities subject to Title V, OAC Chapter 3745-77). If the PER has previously been established and a change is now desired, a PER Change Request form must be filed instead of selecting a date here.

   PER not applicable (Title V) or due date already established

3. **Federal Rules Applicability**

New Source Performance Standards (NSPS) *New Source Performance Standards are listed under 40 CFR 60 - Standards of Performance for New Stationary Sources.*	Not affected
National Emission Standards for Hazardous Air Pollutants (NESHAP) *National Emissions Standards for Hazardous Air Pollutants are listed under 40 CFR 61. (These include asbestos, benzene, beryllium, mercury, and vinyl chloride).*	Not affected
Maximum Achievable Control Technology (MACT) *The Maximum Achievable Control Technology standards are listed under 40 CFR 63 and OAC rule 3745-31-28.*	Not affected
Prevention of Significant Deterioration (PSD) *These rules are found under OAC rule 3745-31-10 through OAC rule 3745-31-20.*	Not affected
Non-Attainment New Source Review *These rules are found under OAC rule 3745-31-21 through OAC rule 3745-31-27.*	Not affected
112 (r) - Risk Management Plan *These rules are found under 40 CFR 68.*	Not affected
Title IV (Acid Rain Requirements) *These rules are found under 40 CFR 72 and 40 CFR 73.*	Not affected

4. **Express PTI/PTIO** - Do you qualify for express PTI or PTIO processing?

   No

5. **Air Contaminant Sources in this Application** - Identify the air contaminant source(s) for which you are applying below. Attach additional pages if necessary. Section II of this application and an EAC form should be completed for each air contaminant source.

Emissions Unit ID	**Company Equipment ID** (company's name for air contaminant source)	**Equipment Description** (List all equipment that are a part of this air contaminant source)

P001	OVEN # 2 (FORMERLY KNOWN AS OVEN # 1)	
P003	OVEN #1 (FORMERLY KNOWN AS OVEN #2)	
P004	DIPPING ROOM	

The Emissions Unit ID would have been created when a previous air permit was issued. If no previous permits have been issued for this air contaminant source, leave this field blank. If this air contaminant source was previously identified in STARShip applications as a Z source (e.g., Z001), please provide that identification and a new ID will be assigned when the PTI/PTIO is issued.

6. **Trade Secret Information** - Is any information included in this application being claimed as a trade secret per Ohio Revised Code (ORC) 3704.08?

   No

7. **Permit Application Contact** - Person to contact for questions about this application:

Gordon Barr		President/Owner
Name		Title
10410 Berea Road	Cleveland, OH	44102
Street Address	City/Township, State	Zip Code
2166317800		gbarr@newkor.com
Phone	Fax	E-mail

8. **Application Attachments**

Description	Type	EAC Form Type	Public Document Id
Newkor Diagram	Process flow diagram		258173
Newkor Calculations	Calculations		258172

Section II - Specific Air Contaminant Source Information

Facility ID: 1318005362
Emissions Unit ID: P001
Company Equipment ID: OVEN # 2 (FORMERLY KNOWN AS OVEN # 1)

One copy of this section should be filled out for each air contaminant source (emissions unit) covered by this PTI/PTIO application identified in Section I, Question 5. See the application instructions for additional information.

1. **Air Contaminant Source Installation or Modification Schedule** Check all that apply (must be completed regardless of date of installation or modification):

   Renewal of an existing permit-to-operate (PTO) or PTIO Identify the date operation began after installation or latest modification (month/year)

2. **SCC Codes** - List all Source Classification Code(s) (SCC) that describe the process(es) performed by this air contaminant source (e.g., 1-02-002-04).

   See Facility Profile

3. **Emissions Information** - The following table requests information needed to determine the applicable requirements and the compliance status of this air contaminant source with those requirements. Suggestions for how to estimate emissions may be found in the instructions to the Emissions Activity Category (EAC) forms required with this application. If you need further assistance, contact your District Office/Local Air Agency representative.
   - If total potential emissions of HAPs or any Toxic Air Contaminant (as identified in OAC rule 3745-114-01) are greater than 1 ton/yr, fill in the table for that (those) pollutant(s). For all other pollutants, if Emissions before controls (max), lb/hr multiplied by 24 hours/day is greater than 10 lbs/day, fill in the table for that pollutant.
   - Actual emissions are calculated including add-on control equipment. If you have no add-on control equipment, Emissions before controls will be the same as Actual emissions.
   - Actual emissions and Requested Allowable should be based on operating 8760 hr/yr unless you are requesting federally enforceable operating restrictions to limit emissions. If so, calculate emissions based on requested operating restrictions and describe in your calculations.
   - If you use units other than lbs/hr or ton/yr, specify the units used (e.g., gr/dscf, lb/ton charged, lb/MMBtu, tons/12-months).
   - Requested Allowable (ton/yr) is often equivalent to Potential to Emit (PTE) as defined in OAC rule 3745-31-01 and OAC rule 3745-77-01.

Pollutant	Emissions before controls (max)* (lb/hr)	Actual emissions (lb/hr)	Actual emissions (ton/year)	Requested Allowable (lb/hr)	Requested Allowable (ton/year)
Particulate emissions (PE/PM) (formerly particulate matter, PM)	0	0	0	0	0
PM # 10 microns in diameter (PE/PM10)	0	0	0	0	0
PM # 2.5 microns in diameter (PE/PM2.5)	0	0	0	0	0
Sulfur dioxide (SO2)	0	0	0	0	0
Nitrogen oxides (NOx)	0	0	0	0	0
Carbon monoxide (CO)	0	0	0	0	0
Organic compounds (OC)	0	0	0	0	0
Volatile organic compounds (VOC)	0	0	0	0	0
Lead (Pb)	0	0	0	0	0
Total Hazardous Air Pollutants (HAPs)	0.875	0.875	1.83	0.878	3.85

P001	OVEN # 2 (FORMERLY KNOWN AS OVEN # 1)	
P003	OVEN #1 (FORMERLY KNOWN AS OVEN #2)	
P004	DIPPING ROOM	

The Emissions Unit ID would have been created when a previous air permit was issued. If no previous permits have been issued for this air contaminant source, leave this field blank. If this air contaminant source was previously identified in STARShip applications as a Z source (e.g., Z001), please provide that identification and a new ID will be assigned when the PTI/PTIO is issued.

6. **Trade Secret Information** - Is any information included in this application being claimed as a trade secret per Ohio Revised Code (ORC) 3704.08?

   No

7. **Permit Application Contact** - Person to contact for questions about this application:

Gordon Barr		President/Owner
Name		Title
10410 Berea Road	Cleveland, OH	44102
Street Address	City/Township, State	Zip Code
2166317800		gbarr@newkor.com
Phone	Fax	E-mail

8. **Application Attachments**

Description	Type	EAC Form Type	Public Document Id
Newkor Diagram	Process flow diagram		258173
Newkor Calculations	Calculations		258172

Section II - Specific Air Contaminant Source Information

Facility ID: 1318005362
Emissions Unit ID: P003
Company Equipment ID: OVEN #1 (FORMERLY KNOWN AS OVEN #2)

One copy of this section should be filled out for each air contaminant source (emissions unit) covered by this PTI/PTIO application identified in Section I, Question 5. See the application instructions for additional information.

1. **Air Contaminant Source Installation or Modification Schedule** Check all that apply (must be completed regardless of date of installation or modification):

   Renewal of an existing permit-to-operate (PTO) or PTIO Identify the date operation began after installation or latest modification (month/year)

2. **SCC Codes** - List all Source Classification Code(s) (SCC) that describe the process(es) performed by this air contaminant source (e.g., 1-02-002-04).

   See Facility Profile

3. **Emissions Information** - The following table requests information needed to determine the applicable requirements and the compliance status of this air contaminant source with those requirements. Suggestions for how to estimate emissions may be found in the instructions to the Emissions Activity Category (EAC) forms required with this application. If you need further assistance, contact your District Office/Local Air Agency representative.
   - If total potential emissions of HAPs or any Toxic Air Contaminant (as identified in OAC rule 3745-114-01) are greater than 1 ton/yr, fill in the table for that (those) pollutant(s). For all other pollutants, if Emissions before controls (max), lb/hr multiplied by 24 hours/day is greater than 10 lbs/day, fill in the table for that pollutant.
   - Actual emissions are calculated including add-on control equipment. If you have no add-on control equipment, Emissions before controls will be the same as Actual emissions.
   - Actual emissions and Requested Allowable should be based on operating 8760 hr/yr unless you are requesting federally enforceable operating restrictions to limit emissions. If so, calculate emissions based on requested operating restrictions and describe in your calculations.
   - If you use units other than lbs/hr or ton/yr, specify the units used (e.g., gr/dscf, lb/ton charged, lb/MMBtu, tons/12-months).
   - Requested Allowable (ton/yr) is often equivalent to Potential to Emit (PTE) as defined in OAC rule 3745-31-01 and OAC rule 3745-77-01.

Pollutant	Emissions before controls (max)* (lb/hr)	Actual emissions (lb/hr)	Actual emissions (ton/year)	Requested Allowable (lb/hr)	Requested Allowable (ton/year)
Particulate emissions (PE/PM) (formerly particulate matter, PM)	0	0	0	0	0
PM # 10 microns in diameter (PE/PM10)	0	0	0	0	0
PM # 2.5 microns in diameter (PE/PM2.5)	0	0	0	0	0
Sulfur dioxide (SO2)	0	0	0	0	0
Nitrogen oxides (NOx)	0	0	0	0	0
Carbon monoxide (CO)	0	0	0	0	0
Organic compounds (OC)	0	0	0	0	0
Volatile organic compounds (VOC)	0	0	0	0	0
Lead (Pb)	0	0	0	0	0
Total Hazardous Air Pollutants (HAPs)	0.875	0.875	1.83	0.875	0

Highest single HAP	[illegible]	0.84	1.75	0.84	3.70

4. **Best Available Technology (BAT)** - For each pollutant for which the Requested Allowable in the above table exceeds 10 tons per year, BAT, as defined in OAC 3745-31-01, is required. Describe what has been selected as BAT and the basis for the selection:

   Care will be used in process to limit material usage. In addition the amounts of methanol have been significantly reduced from 70%/30% blend to 92%/8% blend. We are continuing with our testing to eliminate methanol altogether.

5. **Control Equipment** - Does this air contaminant source employ emissions control equipment?
   See Facility Profile

6. **Process Flow Diagram** - Attach a Process Flow Diagram to this application for this air contaminant source. See the application instructions for additional information.
   Process Flow Diagrams:

Description	Type	EAC Form Type	Public Document Id
Newkor Diagram	Process flow diagram		258173

7. **Modeling information: (Note: items in bold in Tables 7-A and/or 7-B, as applicable, are required even if the tables do not otherwise need to be completed. If applicable, all information is required** An air quality modeling analysis is required for PTIs and PTIOs for new installations or modifications, as defined in OAC rule 3745-31-01, where either the increase of toxic air contaminants from any air contaminant source or the increase of any other pollutant for all air contaminant sources combined exceed a threshold listed below. This analysis is to assure that the impact from the requested project will not exceed Ohios Acceptable Incremental Impacts for criteria pollutants and/or Maximum Allowable Ground Level Concentrations (MAGLC) for toxic air contaminants. (See Ohio EPA, DAPCs Engineering Guide #69 for more information.) Permit requests that would have unacceptable impacts cannot be approved as proposed. See the line-by-line PTI/PTIO instructions for additional information.
   See Facility Profile

8. **Request for Federally Enforceable Limits** - As part of this permit application, do you wish to propose voluntary restrictions to limit emissions in order to avoid specific requirements listed below, (i.e., are you requesting federally enforceable limits to obtain synthetic minor status)?
   Yes
   If yes, why are you requesting federally enforceable limits?
   - Avoid being a major Title V source (see OAC rule 3745-77-01 and OAC rule 3745-31)

9. **Continuous Emissions Monitoring** Does this air contaminant source utilize any continuous emissions monitoring (CEM) equipment for indicating or demonstrating compliance? This does not include continuous parametric monitoring systems.
   See Facility Profile

10. **EAC Forms** The appropriate Emissions Activity Category (EAC) form(s) must be completed and attached for each air contaminant source. At least one complete EAC form must be submitted for each air contaminant source for the application to be considered complete. Refer to the list attached to the application instructions. Please indicate which EAC form corresponds to this air contaminant source.
    Process Flow Diagrams:

Description	Type	EAC Form Type	Public Document Id
Newkor P001	EAC	3100 Process operation (2003)	258180

Section II - Specific Air Contaminant Source Information

Facility ID: 1318005362
Emissions Unit ID: P004
Company Equipment ID: DIPPING ROOM

One copy of this section should be filled out for each air contaminant source (emissions unit) covered by this PTI/PTIO application identified in Section I, Question 5. See the application instructions for additional information.

1. **Air Contaminant Source Installation or Modification Schedule** Check all that apply (must be completed regardless of date of installation or modification):

   Renewal of an existing permit-to-operate (PTO) or PTIO Identify the date operation began after installation or latest modification (month/year)

2. **SCC Codes** - List all Source Classification Code(s) (SCC) that describe the process(es) performed by this air contaminant source (e.g., 1-02-002-04).

   See Facility Profile

3. **Emissions Information** - The following table requests information needed to determine the applicable requirements and the compliance status of this air contaminant source with those requirements. Suggestions for how to estimate emissions may be found in the instructions to the Emissions Activity Category (EAC) forms required with this application. If you need further assistance, contact your District Office/Local Air Agency representative.
   - If total potential emissions of HAPs or any Toxic Air Contaminant (as identified in OAC rule 3745-114-01) are greater than 1 ton/yr, fill in the table for that (those) pollutant(s). For all other pollutants, if Emissions before controls (max), lb/hr multiplied by 24 hours/day is greater than 10 lbs/day, fill in the table for that pollutant.
   - Actual emissions are calculated including add-on control equipment. If you have no add-on control equipment, Emissions before controls will be the same as Actual emissions.
   - Actual emissions and Requested Allowable should be based on operating 8760 hr/yr unless you are requesting federally enforceable operating restrictions to limit emissions. If so, calculate emissions based on requested operating restrictions and describe in your calculations.
   - If you use units other than lbs/hr or ton/yr, specify the units used (e.g., gr/dscf, lb/ton charged, lb/MMBtu, tons/12-months).
   - Requested Allowable (ton/yr) is often equivalent to Potential to Emit (PTE) as defined in OAC rule 3745-31-01 and OAC rule 3745-77-01.

Pollutant	Emissions before controls (max)* (lb/hr)	Actual emissions (lb/hr)	Actual emissions (ton/year)	Requested Allowable (lb/hr)	Requested Allowable (ton/year)
Particulate emissions (PE/PM) (formerly particulate matter, PM)	0	0	0	0	0
PM # 10 microns in diameter (PE/PM10)	0	0	0	0	0
PM # 2.5 microns in diameter (PE/PM2.5)	0	0	0	0	0
Sulfur dioxide (SO2)	0	0	0	0	0
Nitrogen oxides (NOx)	0	0	0	0	0
Carbon monoxide (CO)	0	0	0	0	0
Organic compounds (OC)	46.01	46.01	95.7	46.01	201.5
Volatile organic compounds (VOC)	46.01	46.01	95.7	46.01	201.5
Lead (Pb)	0	0	0	0	0
Total Hazardous Air Pollutants (HAPs)	0	0	0	0	0
Highest single HAP	3.17	3.17	6.6	3.17	13.9

Highest single HAP	.84	0.84	1.75	0.84	0

4. **Best Available Technology (BAT)** - For each pollutant for which the Requested Allowable in the above table exceeds 10 tons per year, BAT, as defined in OAC 3745-31-01, is required. Describe what has been selected as BAT and the basis for the selection:

   Care will be used in process to limit material usage. In addition the amounts of methanol have been significantly reduced from 70%/30% blend to 92%/8% blend. We are continuing with our testing to eliminate methanol altogether.

5. **Control Equipment** - Does this air contaminant source employ emissions control equipment?
   See Facility Profile

6. **Process Flow Diagram** - Attach a Process Flow Diagram to this application for this air contaminant source. See the application instructions for additional information.
   Process Flow Diagrams:

Description	Type	EAC Form Type	Public Document Id
Newkor Diagram	Process flow diagram		258173

7. **Modeling information: (Note: items in bold in Tables 7-A and/or 7-B, as applicable, are required even if the tables do not otherwise need to be completed. If applicable, all information is required** An air quality modeling analysis is required for PTIs and PTIOs for new installations or modifications, as defined in OAC rule 3745-31-01, where either the increase of toxic air contaminants from any air contaminant source or the increase of any other pollutant for all air contaminant sources combined exceed a threshold listed below. This analysis is to assure that the impact from the requested project will not exceed Ohios Acceptable Incremental Impacts for criteria pollutants and/or Maximum Allowable Ground Level Concentrations (MAGLC) for toxic air contaminants. (See Ohio EPA, DAPCs Engineering Guide #69 for more information.) Permit requests that would have unacceptable impacts cannot be approved as proposed. See the line-by-line PTI/PTIO instructions for additional information.
   See Facility Profile

8. **Request for Federally Enforceable Limits** - As part of this permit application, do you wish to propose voluntary restrictions to limit emissions in order to avoid specific requirements listed below, (i.e., are you requesting federally enforceable limits to obtain synthetic minor status)?
   Yes
   If yes, why are you requesting federally enforceable limits?
   - Avoid being a major Title V source (see OAC rule 3745-77-01 and OAC rule 3745-31)

9. **Continuous Emissions Monitoring** Does this air contaminant source utilize any continuous emissions monitoring (CEM) equipment for indicating or demonstrating compliance? This does not include continuous parametric monitoring systems.
   See Facility Profile

10. **EAC Forms** The appropriate Emissions Activity Category (EAC) form(s) must be completed and attached for each air contaminant source. At least one complete EAC form must be submitted for each air contaminant source for the application to be considered complete. Refer to the list attached to the application instructions. Please indicate which EAC form corresponds to this air contaminant source.
    Process Flow Diagrams:

Description	Type	EAC Form Type	Public Document Id
Newkor P003	EAC	3100 Process operation (2003)	258182

4. **Best Available Technology (BAT)** - For each pollutant for which the Requested Allowable in the above table exceeds 10 tons per year, BAT, as defined in OAC 3745-31-01, is required. Describe what has been selected as BAT and the basis for the selection:

   Care will be used in process to limit material usage. In addition the amounts of methanol have been significantly reduced from 70%/30% blend to 92%/8% blend. We are continuing with our testing to eliminate methanol altogether.

5. **Control Equipment** - Does this air contaminant source employ emissions control equipment?
   See Facility Profile

6. **Process Flow Diagram** - Attach a Process Flow Diagram to this application for this air contaminant source. See the application instructions for additional information.
   Process Flow Diagrams:

Description	Type	EAC Form Type	Public Document Id
Newkor Diagram	Process flow diagram		258173

7. **Modeling information: (Note: items in bold in Tables 7-A and/or 7-B, as applicable, are required even if the tables do not otherwise need to be completed. If applicable, all information is required** An air quality modeling analysis is required for PTIs and PTIOs for new installations or modifications, as defined in OAC rule 3745-31-01, where either the increase of toxic air contaminants from any air contaminant source or the increase of any other pollutant for all air contaminant sources combined exceed a threshold listed below. This analysis is to assure that the impact from the requested project will not exceed Ohios Acceptable Incremental Impacts for criteria pollutants and/or Maximum Allowable Ground Level Concentrations (MAGLC) for toxic air contaminants. (See Ohio EPA, DAPCs Engineering Guide #69 for more information.) Permit requests that would have unacceptable impacts cannot be approved as proposed. See the line-by-line PTI/PTIO instructions for additional information.
   See Facility Profile

8. **Request for Federally Enforceable Limits** - As part of this permit application, do you wish to propose voluntary restrictions to limit emissions in order to avoid specific requirements listed below, (i.e., are you requesting federally enforceable limits to obtain synthetic minor status)?
   Yes
   If yes, why are you requesting federally enforceable limits?
   - Avoid being a major Title V source (see OAC rule 3745-77-01 and OAC rule 3745-31)

9. **Continuous Emissions Monitoring** Does this air contaminant source utilize any continuous emissions monitoring (CEM) equipment for indicating or demonstrating compliance? This does not include continuous parametric monitoring systems.
   See Facility Profile

10. **EAC Forms** The appropriate Emissions Activity Category (EAC) form(s) must be completed and attached for each air contaminant source. At least one complete EAC form must be submitted for each air contaminant source for the application to be considered complete. Refer to the list attached to the application instructions. Please indicate which EAC form corresponds to this air contaminant source.
    Process Flow Diagrams:

Description	Type	EAC Form Type	Public Document Id
Newkor P004	EAC	3103 Surface Coating Operations (2003)	258184

FOR OHIO EPA USE
FACILITY ID: _____

EU ID: _____ PTI #: _____

EMISSIONS ACTIVITY CATEGORY FORM
GENERAL PROCESS OPERATION

This form is to be completed for each process operation when there is no specific emissions activity category (EAC) form applicable. If there is more than one end product for this process, copy and complete this form for each additional product (see instructions). Several State/Federal regulations which may apply to process operations are listed in the instructions. Note that there may be other regulations which apply to this emissions unit which are not included in this list.

1. Reason this form is being submitted (Check one)

   ☐ New Permit ☒ Renewal or Modification of Air Permit Number(s) (e.g. P001) P001

2. Maximum Operating Schedule: 24 hours per day ; 365 days per year

   If the schedule is less than 24 hours/day or 365 days/year, what limits the schedule to less than maximum? See instructions for examples. _____

3. End product of this process: paint roll tubes

4. Hourly production rates (indicate appropriate units). Please see the instructions for clarification of "Maximum" and "Average" for new versus existing operations:

Hourly	Rate	Units (e.g., widgets)
Average production	966	paint roller tubes
Maximum production	966	paint roller tubes

5. Annual production rates (indicate appropriate units) Please see the instructions for clarification of "Maximum" and "Actual" for new versus existing operations:

Annual	Rate	Units (e.g., widgets)
Actual production	231840	paint roller tubes
Maximum production	231840	paint roller tubes

6. Type of operation (please check one):

☐ Continuous
☐ Batch (please complete items below)

Minimum cycle* time (minutes): 300
Minimum time between cycles (minutes): 15
Maximum number of cycles per daily 24 hour period: 8
(Note: include cycle time and set up/clean up time.)

*"Cycle" refers to the time the equipment is in operation.

7. Materials used in process at maximum hourly production rate (add rows/pages as needed):

Material	Physical State at Standard Conditions	Principle Use	Amount**
impregnated paper tabs	solid	paint rollers	

** Please indicate the amount **and** rate (e.g., lbs/hr, gallons/hr, lbs/cycle, etc.).

8. Please provide a narrative description of the process below (e.g., coating of metal parts using high VOC content coatings for the manufacture of widgets; emissions controlled by thermal oxidizer...):

Please see calculations page for narrative description

FOR OHIO EPA USE
FACILITY ID: _____

EU ID: _____ PTI #: _____

EMISSIONS ACTIVITY CATEGORY FORM
GENERAL PROCESS OPERATION

This form is to be completed for each process operation when there is no specific emissions activity category (EAC) form applicable. If there is more than one end product for this process, copy and complete this form for each additional product (see instructions). Several State/Federal regulations which may apply to process operations are listed in the instructions. Note that there may be other regulations which apply to this emissions unit which are not included in this list.

1. Reason this form is being submitted (Check one)

   ☐ New Permit ☒ Renewal or Modification of Air Permit Number(s) (e.g. P001) P003

2. Maximum Operating Schedule: 24 hours per day ; 365 days per year

   If the schedule is less than 24 hours/day or 365 days/year, what limits the schedule to less than maximum? See instructions for examples. _____

3. End product of this process: paint roller tubes

4. Hourly production rates (indicate appropriate units). Please see the instructions for clarification of "Maximum" and "Average" for new versus existing operations:

Hourly	Rate	Units (e.g., widgets)
Average production	966	paint roller tubes
Maximum production	966	paint roller tubes

5. Annual production rates (indicate appropriate units) Please see the instructions for clarification of "Maximum" and "Actual" for new versus existing operations:

Annual	Rate	Units (e.g., widgets)
Actual production	231840	paint roller tubes
Maximum production	231840	paint roller tubes

6. Type of operation (please check one):

☐ Continuous
☐ Batch (please complete items below)

Minimum cycle* time (minutes): 300
Minimum time between cycles (minutes): 15
Maximum number of cycles per daily 24 hour period: 8
(Note: include cycle time and set up/clean up time.)

*"Cycle" refers to the time the equipment is in operation.

7. Materials used in process at maximum hourly production rate (add rows/pages as needed):

Material	Physical State at Standard Conditions	Principle Use	Amount**
impregnated paper tubes	Solid	Paint rollers	

** Please indicate the amount **and** rate (e.g., lbs/hr, gallons/hr, lbs/cycle, etc.).

8. Please provide a narrative description of the process below (e.g., coating of metal parts using high VOC content coatings for the manufacture of widgets; emissions controlled by thermal oxidizer...):

Please see Calculation page for narrative description

FOR OHIO EPA USE
FACILITY ID_____
EU ID _____ PTI# _____

EMISSIONS ACTIVITY CATEGORY FORM
SURFACE COATING OPERATIONS

This form is to be completed for each operation in which coatings are applied to parts, substrates, or other materials for functional, decorative, or protective purposes. State/Federal regulations which may apply to surface coating operations are listed in the instructions. Note that there may be other regulations which apply to this emissions unit which are not included in this list.

1. Reason this form is being submitted (Check one)

   ☐ New Permit ☒ Renewal or Modification of Air Permit Number(s) (e.g. K001) P004

2. Maximum Operating Schedule: 24 hours per day; 365 days per year

   If the schedule is less than 24 hours/day or 365 days/year, what limits the schedule to less than maximum? See instructions for examples. _____

3. What type of material(s) are being coated or painted in this operation? Check all that apply.

   ☐ Metal ☐ Plastic ☐ Wood ☐ Rubber ☐ Ceramic ☒ Paper ☐ Fabric
   ☐ Other, describe_____

4. Does this operation involve coating any of the following? Check all that apply.

   ☐ Automobiles/trucks (at assembly plants)
   ☐ Used automobiles (body/collision repair shops)
   ☐ Customized motor vehicles
   ☐ Large appliances
   ☐ Aluminum or copper wire for electromagnetic coils
   ☐ Paper web (roll)
   ☐ Fabric web (roll)
   ☐ Metal cans
   ☐ Metal coils
   ☐ Metal furniture
   ☐ Marine vessels (exterior)
   ☐ Airplanes (exterior)
   ☐ Vinyl
   ☐ Miscellaneous metal parts

5. Is any type of curing or flash-off oven associated with this coating operation?

   ☒ Yes. Complete oven information below. ☐ No, coatings are air-dried.

Oven #1:	☐ Electric	☐ Infrared (IR)	☐ Ultraviolet (UV)	☒ Gas-fired, total burner rating (BTU/hr)_____
Oven #2:	☐ Electric	☐ Infrared (IR)	☐ Ultraviolet (UV)	☒ Gas-fired, total burner rating (BTU/hr)_____
Oven #3:	☐ Electric	☐ Infrared (IR)	☐ Ultraviolet (UV)	☐ Gas-fired, total burner rating (BTU/hr)_____

For fuel fired ovens only: Do coating or solvent vapors come in direct contact with flame? ☐ Yes ☒ No
If "yes", list applicable oven numbers _____

6. How are parts cleaned prior to coating application?

☒ Not done
☐ Water-based parts washer
☐ Manual wipe with solvent
☐ Solvent bath immersion
☐ Solvent vapor immersion
☐ Bake oven

If a solvent is used for cleaning the parts, list the type and annual usage (in gallons) below.

Name of solvent:_____ Annual usage:_____ gallons
Solvent density : _____lb/gal

7. Does the coating operation employ a booth or enclosure for coating application?

☐ Yes ☒ No, explain tanks are in A room.

If "Yes", complete the table below: (see instructions)

Booth Manufacturer	Make or Model Number	Exhaust Equipment

8. Check the method(s) of coating application and provide the accompanying information:

☐ Spray ____ Air gun ____ Airless ____ Electrostatic ____ High Volume Low Pressure (HVLP)
____ Other, describe_____

☐ Electrodeposition: Tank capacity (gallons_____
Tank Dimensions (feet): length ____ height ____ width ____

☒ Dip tank: 2 tanks ea. Capacity (gallons) 4000 each
Dimensions (feet): length 70" height 76" width 46"

☐ Roll coating ☐ Brush

☐ Powder coating ☐ Other, describe _____

9. How are parts transferred in and out of coating operation? ☒ Manually ☐ Conveyor

10. **Coating Type and Usage Data**

Complete Table 1 on the following page identifying the types and usages of all coatings, thinners, reducers, etc. used in this coating operation. **See Instructions for completing this section.**

11. Are any of the coatings listed in Table 1 required to be baked, heat-cured, or heat polymerized at temperatures above 250°F?

☒ Yes ☐ No

If yes, list all coatings required to be baked, heat cured, or heat polymerized:

_____

12. Are any photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5), used in this air contaminant source (including cleanup)? ☒ Yes ☐ No

13. Complete the following table for all cleanup materials and solvents used in the coating operation to clean paint guns, booth walls, etc. Do not include the amounts of solvents used for parts cleaning (question 6) or for thinning or reducing coatings (question 10, Table 1).

No clean-up

Name of cleanup material/solvent	Solvent density (lb/gal)	Maximum Monthly Use (gallons)	Maximum Annual Use (gallons)

14. If any used solvents from this operation are reclaimed on-site using a solvent reclaiming unit (still), provide the capacity of the still and the approximate number of gallons reclaimed annually.

No

Still capacity = _____ gallons Amount reclaimed = _____ gal/yr

15. If any used solvents from this operation are sent off-site for disposal, provide the following information: None

Minimum amount of solvent waste disposed of throughout the year: _____gallons

Average solvent content of solvent waste: _____percent by volume

Shaffer, Valerie

From: Annette [annette@newkor.com]
Sent: Friday, April 17, 2009 11:37 AM
To: Shaffer, Valerie
Subject: Re: date of using 7.5 methanol blend

Hi Valerie,

The first deliver of the methanol/alcohol blend was on 4/6/09. According to the invoice the blend came in at 92%-8%. I would be happy to fax you a copy of the invoice. If there is anything else you need please let me know.

See attached.

Have a good day!

Annette Kinder
Newkor, Inc.
Phone: 216-631-7800
---- Original Message -----

From: Shaffer, Valerie
To: 'Gordon Barr' ; Annette
Sent: Friday, April 17, 2009 10:28 AM
Subject: date of using 7.5 methanol blend

Gordon or Annette,

I need the exact date when NewKor started using the 7.5% methanol/92.5% alcohol blend. As CDAQ understands, NewKor used a 15% methanol and 85% IPA blend in the month of February. In addition, can you provide me with a copy of production records being kept which shows the amounts of methanol and IPA being used?

Also, the permit application submittals for P001, P003, and P004 are in Air Services/Stars 2.

Please call if you have any questions.

As of 4/14/09.

Respectfully,

Valerie L Shaffer
Environmental Enforcement Specialist
Cleveland Division of Air Quality
75 Erieview Plaza
Cleveland, OH 44114
phone: 216/ 664-6292
email: vshaffer@city.cleveland.oh.us

CALCULATIONS FOR
NEWKOR, INC.

NewKor, Inc. manufactures the core of paint rollers. The core is made from paper which is wound and glued together with an adhesive (Evans Adhesive 08032). After being formed, the core is soaked in a phenolic resin (Georgia-Pacific Chemicals GP 5101 RESI-MIX Plywood Adhesive) and alcohol (Chemical Solvents Newkor Blend N92.5/7.5 co nsisting of 92. 5% isopropanol and 7.7% methanol). The resin and alcohol are contained in a double dip tank system. Each tank is 4,000 gallons. The tanks measure 46"x70" and 76" deep. The tanks are filled about once a month. The dip tanks are permitted as P004.

After soaking in the tanks, the cores are air dried for two days and then undergo curing in an oven. Curing consists of a 2-3 hour oven dry followed by a 3 hour bake. NewKor, Inc. has two shifts for five days per week for 52 weeks per year. There are two ovens permitted as P001 and P002. They are identical Midland Ross 2.2 million BTU gas fired ovens. Ovens are used equally.

The primary pollutants are phenols from the resin, methanol and isopropyl from the alcohols. The alcohol evaporates in the dip room and drying room. It has evaporated fully before the tubes go into the ovens. The phenol is emitted during the oven curing process. During 2008, NewKor, Inc. used 232,960 pounds of resin (116.48 ton/yr) and 220,435 pounds of alcohol (110 ton/yr).

Chemical Solvents Newkor Blend N92.5/7.5 consists of 7.5% methanol and 92.5% isopropyl alcohol. Georgia-Pacific Chemicals GP 5101 TYBON Phenolic Saturating Resin (GP 5101) contains phenol (11.5%) and formaldehyde (<0.5 %). MSDS are attached for each of these materials. This mixture is absorbed into the fibrous walls of the tubes. When the tubes are baked, the phenolic resin is thermoset into a material called Bakelite.

Calculations for emissions based on 2008 material usage leads to NewKor requiring a Title V permit. These are below.

	(amount of resin)	(% emitted)[1]	(% phenol, formaldehyde or alcohol)	
Emissions of resin =	(116.48 ton/yr)	(0.35)	(0.115) =	**4.7 ton/yr**
Emissions of formaldehyde	(116.48 ton/yr)	(0.35)	(0.005) =	**0.2 ton/yr**
Emissions of alcohol	(116.48 ton/yr)	(0.35)	(0.25) =	**10.2 ton/yr**

	(amount of alcohol)	(% emitted)	(% methanol or isopropyl)	
Emissions of methanol	(110 ton/yr).	(100%)	(0.075) =	**8.25 ton/yr**
Emissions of isopropanol	(110 ton/yr)	(100%)	(0.92.5 =	**102 ton/yr**

w/ the 70%/30% blend

Total emissions of VOC = 125.35 ton/yr with 12.95 HAPS

[1]The percent volatile is 35%. For these calculations, it will be assumed all the phenol volatilizes.

NewKor would like to apply for a synthetic minor permit, emitting less than 100 ton/year of volatile organic compounds and less than 25 ton/year of Hazardous Air Pollutants (HAP) with less than 10 ton/year of any individual HAP. Therefore the calculations are based on using 25% less material. This is possible because NewKor has had a decrease in business.

For 2009?

NewKor is actively looking into material changes which will lead to lower alcohol emissions. The goal is to have these changes in place before business increases. Lowering alcohol emissions will allow for more material to be processed.

Calculations for emissions for the permit application are below.

From resin

(amount of resin) (% emitted)[1] (% phenol, formaldehyde or alcohol)

Emissions of phenol = (88 ton/yr) (0.35) (0.115) = **3.5 ton/yr**
Emissions of formaldehyde (88 ton/yr) (0.35) (0.005) = **0.15 ton/yr**
Emissions of isopropyl (88 ton/yr) (0.35) (0.25) = **7.7 ton/yr**

From added alcohol

(amount of alcohol) (% emitted) (% methanol or isopropyl)

Emissions of methanol (88 ton/yr). (100%) (0.075) = **6.6 ton/yr**
Emissions of isopropyl (88 ton/yr) (100%) (0.92.5 = **81.4 ton/yr**

Total phenol = 3.5 ton/yr
Total formaldehyde = 0.15 ton/yr
Total methanol = 6.6 ton/yr
Total isopropyl = 89.1
Total alcohol = 95.7 ton/yr
Total emissions of VOC = 99.35 ton/yr with 10.25 Total HAPS

[1]The percent volatile is 35%. For these calculations, it will be assumed all the phenol volatilizes.

Emission Unit	Compound	Emission (lb/hr)	Emission (ton/yr) at 8760 hr/year	Emission (ton/yr) at 4160* hr/yr
P001, P002	Phenol	1.68**	7.4**	3.5**
P001, P002	Formaldehyde	0.07**	0.3**	0.15**
P001, P002	Total HAPs	1.75**	7.7**	3.65**
P001, P002	Total VOC	1.75**	7.7**	3.65**
P004	Methanol	3.17	13.9	6.6
P004	isopropyl	42.84	187.6	89.1
P004	Total HAPs	3.17	13.9	6.6
P004	Total VOC	46.01	201.5	95.7

***16 hour/day, 5 day/week, 52 week/yr**
****on the application these emissions are divided by 2, half for each oven**

The alcohols are emitted during the dipping and drying process. These air emissions will be included with unit P004. The phenol and formaldehyde are emitted during the baking process. These will be included in the air emissions for units P001 and P002.

Shaffer, Valerie

From: Shaffer, Valerie
Sent: Thursday, April 02, 2009 9:30 AM
To: 'Gordon Barr'; Annette
Cc: 'Adrienne LaFavre'; White, Valencia
Subject: applications submitted via Stars2

Mr. Barr,

CDAQ is in receipt of your letter on April 1, 2009. The letter states that as of 3-15-09, NewKor has completed entry of requested permit(s) electronically. The letter continues to state that NewKor submitted an application as a synthetic minor facility.

I have accessed the Ohio EPA database "Air Services" (Stars 2) and I am unable to verify that permit applications have been submitted electronically for air emission sources at your facility.

CDAQ did receive hard-copy applications via postal mail on March 17, 2009. As you are aware, all synthetic minor applications must be submitted via "Air Services" as of June 30, 2008.

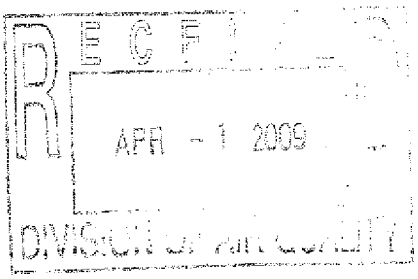
Sincerely,

Valerie L Shaffer
Environmental Enforcement Specialist
Cleveland Division of Air Quality
75 Erieview Plaza
Cleveland, OH 44114
phone: 216/ 664-6292
email: vshaffer@city.cleveland.oh.us

- Need verification of electronic submittal as 4/1/09.

NewKor, Inc

10410 Berea Road * Cleveland, Ohio 44102
Telephone (216) 631-7800
Fax (216) 631-7886
gbarr@newkor.com



Ms. Valencia White
Cleveland Division of Air Quality
1925 St. Clair Avenue
Cleveland, Ohio
44114-2080

Dear Ms. White,

3-25-09

We have been working closely with Adrienne La Farve from the Ohio EPA Office in Twinsburg. I just wanted to address a few of your points from your letter of March 9th, 2009.

Regarding failure to submit a timely Title V permit, I bought the company in November of 1999. We had several EPA permits that we have always paid and are up to date. We were unaware of the other permit requirements. As of 3-15-09 NewKor submitted both hard copy and completed entry of our permit electronically.

Regarding failure to submit a acceptable corrective action plan cited in January 27, 2009 NOV, could you please clarify why our response of 2-4-09 was not acceptable? Again, we worked closely with Adrienne La Farve and several members of the Ohio EPA's Twinsburg office. They felt our response was reasonable and proper.

Regarding our failure to submit a timely corrective action plan for odor nuisance violations cited in the September 8th, 2008 NOV, we have been working with CDAC to determine where and when the odor exists. The complaints come in every 30-45 days and have a hang time of 10-15 minutes. We don't even know if the odor is coming from our plant. We are working with the OCAPP and are doing modeling of the emissions to see if stack height might make a difference. However, the data points are so small and random conclusions are really hard to draw.

Regarding exceeding organic compound emissions, we have reformulated our resin mixes that will bring us in line as a synthetic minor. We used the same protocols as the prior owner. When we realized the error, we acted quickly to right the error.

Unfortunately, the new formulations are dramatically more expensive. This is going to hurt our business at a time when we can least afford to be hurt.

Regarding not submitting annual fee emissions reports or paying fees, we are starting to do that now. In the years I have owned the company, we have been paying many fees to the Ohio EPA. We have been in full view of the Ohio/ Cleveland EPA.

Regarding adding Methanol to our IPA, we only recently realized our permit requirement for this. We used the processes we inherited when I bought the business. As soon as we realized the requirement, we immediately started instituting changes to our process. We have almost totally eliminated the use of methanol. Acetone and water based products are being explored as well to further reduce emissions.

Regarding emissions exceeding the allowable limit of forty pounds…., we were not aware of these limits. We have instituted changes that will result in significant reduction/ the elimination of most VOC/ OC emissions.

Regarding a detailed engineering study…reducing VOC emissions… The EPA Twinsburg office and NewKor decided that instead of an engineering study we are changing materials so as to limit emissions.

To sum up, NewKor with the help of the staff of the Twinsburg EPA office submitted an application as a synthetic minor facility and is now operating as one. NewKor plans to operate as a synthetic minor in the future and plans to continue to limit further its VOC and OC emissions by adjusting content materials in its resin mix.

We really appreciate your help. As a manufacturing company we face many challenges such as the collapse of the manufacturing economy, harsh competition from China, the cost of third party environmental firms, and the expensive raw material changes we are making to our resin process. It was really great to work with the OCAPP as they helped guide us through this process.

Sincerely yours,

Gordon L. Barr
President

NewKor, Inc. **13-18-00-5362**

Solvent Purchased Solvent purchased is 70 IPA/30 Methanol blend: MSDS S.G. = 0.79; lbs/gal = 6.59

Year	Date	gallons purchased	lbs (*6.59 lbs/gal)	Total lbs/year	tpy (/2000)	VOC tpy	Methanol HAP (tpy)	Comments
2006	12/20/2005	3040	20033.6					On 2-24-06 and 4-28-06, two additional shipments of a 85/15 solvent were purchased (see purchase records in Exhibit 5); which added 20.09 tpy VOC and 3.02 tpy HAP to the 2006 totals. See below.
	1/19/2006	3043	20053.37					
	4/5/2006	3009	19829.31					
	6/5/2006	2839	18709.01					
	6/27/2006	2906	19150.54					
	7/24/2006	2951	19447.09					
	8/22/2006	3462	22814.58					
	9/13/2006	3102	20442.18					
	10/11/2006	3088	20349.92	241,020	120.51	120.51	33.15	addition of added purchases 85/15 blend
	11/8/2006	3036	20007.24	~~200,837~~	~~100.42~~	~~100.42~~	~~30.13~~	
2007	11/30/2006	3003	19789.77					
	1/12/2007	2909	19170.31					
	2/12/2007	2824	18610.16					
	3/21/2007	3070	20231.3					
	4/25/2007	2967	19552.53					
	5/23/2007	3006	19809.54					
	6/25/2007	2933	19328.47					
	8/7/2007	3000	19770					
	9/21/2007	3122	20573.98					
	10/26/2007	3036	20007.24	196,843	98.42	98.42	29.53	
2008	11/21/2007	3033	19987.47					
	1/7/2008	3097	20409.23					
	2/4/2008	2979	19631.61					
	2/27/2008	3043	20053.37					
	3/27/2008	2909	19170.31					
	4/28/2008	2985	19671.15					
	6/3/2008	3009	19829.31					
	7/3/2008	3033	19987.47					
	7/30/2008	2991	19710.69					
	9/5/2008	3380	22274.2					
	10/7/2008	2991	19710.69	220,436	110.22	110.22	33.07	

* Solvent is 30% methanol (HAP)

	2006	2007	2008	
Combined resin and solvent VOC total (tpy)	172.15	133.80	156.07	TOTAL VOC (tpy)
Combined resin and solvent HAP total (tpy)	39.83	34.10	38.99	TOTAL HAP (tpy)

NewKor, Inc. **13-18-00-5362**

Resin Purchased Supplier: Georgia Pacific

11.5 % phenol; 0.05 % by wt. formaldehyde; 35% by wt. volatile

Year	Date	lbs purchased	Total lbs/year	tons/yr (TPY)	VOC (tpy)	Phenol HAP (tpy)	Formaldehyde HAP (tpy)	TOTAL HAP (tpy)
2006	12/19/2005	29,040						
	1/26/2006	28,720						
	3/5/2006	27,320						
	4/13/2006	26,920						
	5/14/2006	29,980						
	6/19/2006	28,160						
	7/18/2006	6,380						
	7/21/2006	31,220						
	8/24/2006	29,140						
	9/21/2006	28,840						
	10/22/2006	29,340	295,060	147.53	51.64	5.94	0.74	6.68
2007	12/3/2006	29,000						
	2/4/2007	28,960						
	4/9/2007	29,360						
	5/13/2007	30,000						
	6/24/2007	28,780						
	8/12/2007	28,160						
	10/1/2007	27,920	202,180	101.09	35.38	4.07	0.51	4.57
2008	11/14/2007	29,040						
	1/17/2008	28,680						
	2/24/2008	27,740						
	4/8/2008	29,520						
	5/18/2008	29,220						
	7/10/2008	29,420						
	8/5/2008	29,340						
	9/14/2008	29,600						
	11/13/2008	29,440	262,000	131	45.85	5.27	0.66	5.93

* resin contains phenol and formaldehyde which are both HAPs

** MSDS provided in Exhibit 6

	2006	2007	2008	
Combined resin and solvent VOC total (tpy)	172.15	133.80	156.07	
Combined resin and solvent HAP total (tpy)	39.83	34.10	38.99	