

**Environmental
Protection Agency**

**Governor
Lt. Governor
Director**

November 9, 2011

RE: PROCEX, LTD.
OHR000115352
PORTAGE COUNTY
LQG CEI NOV #4/ PRTC

Earl Hamlin, Owner
Procex, Ltd.
880 Cherry St.
Kent, OH 44240

CERTIFIED MAIL

Dear Mr. Hamlin:

On September 26th, September 27th and October 31st, 2011, we received letters from you responding to my September 8, 2011 third notice of violations letter. With your letters you submitted an analytical report, inspection logs, contingency plan cover letters, training documentation and a blank land disposal restriction form. After reviewing this information, we find the following violations remain.

1. **Satellite Accumulation (>55 Gallons and Incorrect Date) - OAC 3745-52-34(C)(1)&(2)**

Your September 23rd letter and attachments implies that you have established two <90 day accumulation areas, one on the north wall and a second one on the east wall. Your responses did not address the satellite accumulation area by the salt bath. How do you plan to label, date, and manage any containers of hazardous waste in this area?

2. **Incomplete LDR Form - OAC 3745-270-07(A)(2)**

The land disposal restriction form for the salt bath sludge going to Chemtron appeared to be missing a second page that would show which underlying hazardous waste constituents would be present. You submitted a blank two page Chemtron LDR form. Please submit a **completed** LDR form for your salt bath sludge. You can probably obtain a copy of this completed form from Chemtron.

Please address each of these violations immediately and submit the requested responses and documentation within 5 days of the date of this letter. Copies of the cited rules can be found at http://www.epa.ohio.gov/dhwm/laws_regs.aspx.

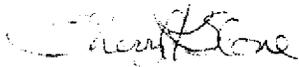
Also since you now have two <90 day storage areas, they both need to be located on your facility map in your contingency plan. Please update your map to include both areas and replace the out of date map in your contingency plan. Submit the revised page to me and the other local emergency authorities.

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In your September 27, 2011 letter, you requested two diagrams be sent back to you. I assume you mean the two facility layout maps that were included with your contingency plan and they are enclosed.

Should you have any questions related to this letter, please feel free to call me at (330) 963-1226.

Sincerely,



Sheryl K. Slone, P.E.
District Engineer
Division of Materials and Waste Management

SKS:ddw

Enclosure

ec: Natalie Oryshkewych, DMWM, NEDO
Nyall McKenna, DMWM, NEDO
Jeff Mayhugh, DMWM, CO
cc: Marlene Kinney, DMWM, NEDO

The absence of a specific deficiency or violation in this letter does not relieve your facility from the obligation to comply with all applicable regulations.