

Air Pollution Control Division

Canton City Health Department

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(330) 489-3385 • Fax: (330) 489-3335

Ohio Environmental Protection Agency
APC Contractual Representative
Serving All of Stark County

Daniel J. Aleman, MBA, PE
APCD Administrator

James M. Adams, RS, MPH
Health Commissioner

October 27, 2010

CERTIFIED MAIL

Scotty Richmond
PCC Airfoils, LLC
3860 Union Ave SE
Minerva, OH 44657

**Re: Warning Letter
Follow-up to Full Compliance Evaluation Inspection Conducted on September 27, 2010
PCC Airfoils, LLC
Facility ID 15 76 00 0096
Stark County**

Dear Mr. Richmond:

Thank you and Mr. Hadzinsky for meeting with me on 09/27/2010 during my onsite Full Compliance Evaluation Inspection. A thorough review of your facility operations and records was completed during that time. Your cooperation was greatly appreciated and your recordkeeping was found to be well organized. I found your facility to be well kept and clean demonstrating good housekeeping practices. The inspection also provided insight into your operations that will be useful in your FESOP permit writing that I will be completing in the near future.

In regards to your FESOP permit, a detailed technical review of the FESOP application will take place in the near future. At that point, a separate letter will be sent to you describing what actions are required of you to jump start the FESOP permit writing process again. These may include additional issues from the inspection, MACT rule applicability, and incorporation of the corrective actions requested in this letter. Please note that the draft FESOP permit terms and conditions that have been issued to you in the past were not used to determine your facility's compliance status.

After the onsite inspection, several emails of follow-up questions were sent to you on the days 09/28/2010, 09/29/2010, and 10/08/2010. You sent several emails on the days 09/27/2010, 09/28/2010, 09/29/2010, 10/05/2010 and 10/18/2010. You responded to the majority of my emailed questions in those emails. After thoroughly reviewing your answers to my questions and the information gathered during the inspection, several deficiencies have been identified.

The following are the deficiencies identified during my compliance evaluation of your facility and their requested corrective actions.

Recordkeeping for Acid Etch Lines (P078 & P079) Units with Scrubbers FS-1 & FS-2:

The most recent permits for Acid Etch Line P078 with Fume Scrubber FS-1 are PTI 15-738, which was modified in 03/23/1994, and the Permit-to-Operate (PTO) issued on 05/20/1994. Since the PTO is the most recently issued permit, it will be the permit referenced in the sections below. The most recent permit for Acid

Etch Line P079 with Fume Scrubber FS-2 is PTI 15-1126 which was issued on 07/07/1994. A PTO was applied for in 1994 as part of the FESOP application, but was never issued by this agency. The PTI will be the permit referenced in the sections below.

Finding #1: Once per week recorded readings of the pressure drop and water recirculation flowrate for scrubbers FS-1 and FS-2 are required per the air permits for emission units P078 and P079, respectively. In the P078 PTO, this requirement for weekly recorded readings is listed as term 4.C. In the P079 PTI, this requirement for weekly recorded reading is listed as term 2.C.

The documentation provided via email for the scrubber maintenance records showed weekly and quarterly preventative maintenance (PM) work orders. As indicated on the weekly PM work order record, the pressure drop and water recirculation flowrate are to be checked once per shift and recorded as such on the checklists TMFC #20-2035 "Daily Checklist for FS-1 Fume Scrubber" and TMFC #20-2036 "Daily Checklist for FS-2 Fume Scrubber". These checklists are also the record used to record the actual readings of the pressure drop and water recirculation flowrate for each scrubber once per week to comply with the permits. Per the completed checklists documentation provided via email, the weekly readings were not being recorded as required during the timeframe of 07/25/2010 – 09/26/2010. For the completed checklists for 09/26/2010 through 10/02/2010, actual readings were being recorded. All of those readings are in compliance with the permit levels.

Corrective Action #1: Immediately begin recording the pressure drop and water recirculation flowrate readings for scrubbers FS-1 and FS-2 at least once per week as required by the permits for P078 and P079. These readings may be recorded on the checklists TMFC# 20-2035 and TMFC #20-2036 if desired.

Please submit a copy of your recorded readings from 10/01/2010 through 11/19/2010 within 30 days of the date of this letter.

Finding #2 Both the checklists TMFC #20-2035 "Daily Checklist for FS-1 Fume Scrubber" and TMFC #20-2036 "Daily Checklist for FS-2 Fume Scrubber" have ranges indicated that do not match the permits' allowable ranges. For TMFC #20-2035 "Daily Checklist for FS-1 Fume Scrubber," the pressure drop should not exceed 2.5" H₂O, not the 3" H₂O included on the checklist. If the FS-1 scrubber was allowed to operate at 3" H₂O it would be in violation with the permit terms. For TMFC #20-2036 "Daily Checklist for FS-2 Fume Scrubber," the pressure drop should not exceed 5.5" H₂O, not the 3" H₂O included on the checklist, and the flowrate requires 76 gpm, not the 75 gpm included on the checklist. If the FS-2 scrubber was allowed to operate at 75 gpm it would be in violation with the permit terms.

Corrective Action #2: Please revise the checklists TMFC #20-2035 "Daily Checklist for FS-1 Fume Scrubber" and TMFC #20-2036 "Daily Checklist for FS-2 Fume Scrubber" to reflect the permits' allowable parameter ranges for pressure drop and water recirculation flowrate.

Please submit a copy of your revised checklists within 30 days of the date of this letter. This can be satisfied by submitting the Corrective Action #1 if these checklists are being used to record the actual readings for pressure drop and water recirculation flowrate.

Finding #3 The scrubber maintenance records provided via email were for the last 60 days, which is the maximum storage capacity for the maintenance recordkeeping system used at PCC Airfoils, LLC per the information exchanged during the inspection. Per P079 PTI term 2.F. all records of readings and maintenance conducted shall be retained for a minimum of 3 years. Per P078 PTO term 4.F. all records of readings and maintenance conducted shall be retained for a minimum of 2 years. Since records were only available for 60 days, neither of these permit terms are being complied with.

Corrective Action #3: Please develop a recordkeeping program to retain all readings and maintenance records for the minimum periods as required by the permits for P078 and P079. Submit a written description of the recordkeeping program developed within 30 days of the date of this letter.

During the next onsite inspection, the records for P078 and P079 will be reviewed to verify the implementation of the recordkeeping program.

Finding #4 During the inspection on 09/27/2010, both the scrubbers were not operating within the allowable permit ranges for water recirculation flowrate. The allowable permit ranges for P078 with FS-1 scrubber are maximum 2.5" H₂O and minimum 45 gpm water recirculation flowrate. During the inspection, the pressure drop was 1.4" H₂O and the flowrate was 43 gpm. The flowrate was below the minimum permit allowable level. The allowable permit ranges for P079 with FS-2 scrubber are maximum 5.5" H₂O and minimum 76 gpm water recirculation flowrate. During the inspection, the pressure drop was 5.5" H₂O and the flowrate was 51 gpm. The flowrate was below the minimum permit allowable level.

Corrective Action #4: Per the documentation provided via email on 09/27/2010, the out of permit allowable range scrubber flowrates observed on 09/27/2010 were corrected and training was conducted for the responsible maintenance staff. These are acceptable corrective actions for the deviation occurrences. These actions also show that PCC Airfoils, LLC is complying with the terms in both permits requiring immediate maintenance when the scrubber parameters are not within the permitted range. No further action is required at this time.

Recordkeeping and Operations for HMC Car Bottom Furnace (N005):

The most recent permit for the HMC Car Bottom Furnace N005 is PTI 15-1345, which was modified in 03/22/2001. A PTO was applied for in 2003 as part of the revised FESOP application, but was never issued by this agency. The PTI will be the permit referenced in the sections below.

Finding #5: Certain data is required to be recorded on a regular basis to comply with the N005 air permit. In the quarterly deviation reports submitted to this agency for N005, there is a statement saying "the data collection system for this furnace records the data of 21 different parameters every 30 seconds during the course of a cycle and is available upon request." This data was requested during the inspection for one day per month over the past 6 months as specified by this agency. The requested data was provided via email on 09/29/2010. Within that data there are several columns denoted with "TC" in the name that represent temperature readings. No explanation of what these data columns represent has been provided as requested via email on 10/08/2010. Additional data was provided on 10/18/2010 for the day 09/17/2010 for every 30 seconds that is recorded with the data columns explained.

Per the N005 permit term B.3.a, daily afterburner temperatures averaged in 3-hour blocks of time are to be recorded. Per the data provided as discussed above, the afterburner temperature is being recorded continuously (every 30 seconds) which complies with N005 permit term B.2. but does not average the temperature in 3 hour time periods as required by N005 permit term B.3.a.

- Corrective Action #5a:** Please provide a written description of what the temperature data provided via email on 09/29/2010 represents. In the description, answer the specific questions that were emailed on 10/08/2010. Here is a summary of these questions:
1. There are 6 columns that start with "TC" that are assumed to represent temperature data. What does each column stand for?
 2. Since there is continuous temperature measurement but only one temperature recording per batch per column, what does that value represent (i.e. minimum temperature for the cycle, average temperature for the cycle, temperature after 1 hour of the cycle start, etc.)?

Submit the written description within 30 days of the date of this letter.

- Corrective Action #5b:** In regards to the records for 3-hour average afterburner temperatures, please submit in writing a request to keep or remove this term from the N005 permit. Whichever the request is will be considered in the development of the draft Terms & Conditions (T&Cs) for the FESOP permit to be issued in the near future. Submit this written request within 30 days of the date of this letter.

No other corrective action is necessary at this time. If the 3-hour average afterburner temperature records are still a requirement, then a request will be made by this agency for PCC Airfoils, LLC to implement recordkeeping program changes (i.e. data collection system programming changes, etc) to accommodate this requirement prior to the FESOP permit being issued as final.

- Finding #6:** The N005 permit term A.3 states, "*The afterburner shall be operated such that a minimum residence time of 1.6 seconds is maintained at all times during operation. The permittee shall install and operate a flow monitor in order to demonstrate that this residence time is being achieved.*"

The minimum residence time value in the permit term was included as part of the original PTI application for N005 submitted on 08/06/1998. This residence time was calculated using the set volume of the afterburner (108 cubic feet) and a maximum air flowrate at 1400°F of 4026 cfm. During the stack test conducted for this unit on 08/12/1999, the agency inspector was able to record the air flowrate (blower flowrate) during the test. These flowrates were on average 943 cfm. This complies with both the residence time and the flow monitor requirements in permit term A.3.

However, during the inspection conducted on 09/27/2010 the air flowrate was not able to be observed due to no flow monitor was available to read. It was discussed during the inspection that the low-air alarm in the N005 electronic controls program is utilized to monitor air flow pressure and shuts down the furnace if it is out of the set range. Due to this current setup, no air flowrate measurements are being recorded. This does not comply with the N005 permit term 4 requiring daily records of the air flowrate to demonstrate the residence time requirement is being achieved.

Corrective Action #6: Please provide a detailed written description as to how the low-air alarm in the electronic controls functions and reflects the residence time is being achieved. Also provide a written response describing what happened to the blower flow meter available in 1999. Submit this written report within 30 days of the date of this letter.

After your written response is reviewed, a request may be made by this agency for PCC Airfoils, LLC to install an air flow monitor and implement a daily recording procedure.

Finding #7: In the data submitted via email on 10/18/2010 for the day 09/17/2010, as discussed in Finding #5, there is a column for the afterburner temperature setpoint and the actual afterburner temperature. Within that data, the afterburner temperature setpoint was maintained at 1400°F and there were 4 data recordings where the actual afterburner temperature was below that setpoint. These are summarized in the table below.

Date	Time	AB Temperature
09/17/2010	3:54:00 AM	1396°F
09/17/2010	3:54:30 AM	1396°F
09/17/2010	3:58:00 AM	1397°F
09/17/2010	3:58:30 AM	1398°F

During the inspection, it was discussed that there is a low-temperature alarm that will shut down the furnace when the afterburner temperature falls below the setpoint. When does the low-temp alarm go off if the furnace didn't shutdown during the identified 4 times in the table above? The afterburner temperature minimum of 1400°F was included as part of the original PTI application for N005 submitted on 08/06/1998. The afterburner temperature should never be allowed to fall below the setpoint, or minimum. This is especially important when the minimum afterburner temperature is defined as specified in Finding #11.

Corrective Action #7: Please provide a detailed written description explaining how the low-temperature alarm in the electronic controls functions and how it is possible to have temperatures less than the setpoint temperature. Submit this written request within 30 days of the date of this letter.

After your written response is reviewed, a request may be made by this agency for PCC Airfoils, LLC to update your electronic controls programming so the minimum temperature is always achieved.

Finding #8: Daily records are required for several N005 permit terms as identified previously. Of the records available, only 30 days of data was in the active database and approximately one year of data is kept in archive. Per the N005 PTI page 6 "Records Retention and Availability" section, records are to be retained for a minimum of 3 years.

Corrective Action #8: Please develop a recordkeeping program to retain all permit required records for the minimum 3 years as required. Submit a written description of the recordkeeping program developed within 30 days of the date of this letter.

During the next onsite inspection, the records for N005 will be reviewed to verify the implementation of the recordkeeping program.

Finding #9: Per the N005 permit term B.3.b., a daily log of downtime of the afterburner, collection system (fan), and monitoring equipment is to be recorded. During the inspection, it was discussed that the furnace is not capable of operating without the afterburner operating.

Corrective Action #9: Please provide a detailed written description explaining how the furnace is not able to operate without the afterburner operating. Submit this written request within 30 days of the date of this letter.

After your written response is reviewed, a request may be made by this agency for PCC Airfoils, LLC to update your electronic controls programming or recordkeeping program to include a means of recording afterburner downtime.

Finding #10: N005 afterburner inspections are being completed quarterly and recorded on form TMFC 20-2923. A copy of the inspection form is submitted quarterly to this agency as required by your old permit PTI 15-01345 issued in 1998. The current permit, issued in 2001, states in permit term B.5 that these inspections shall be completed annually, instead of quarterly. Various items to check during the inspection are specified within the inspection form TMFC 20-2923. Please review the permit term B.5 and B.6 to ensure all these specific inspection items are being completed as required.

Corrective Action #10: If necessary, update the details in the inspection form TMFC 20-2923 to coordinate with the permit language to demonstrate compliance with the permit term for annual inspections. If desired, start implementing annual inspections instead of quarterly inspections and submit the reports to this agency as in the past (required by permit term C.4.). Submit a written description of what was completed for this corrective within 30 days of the date of this letter, along with an updated copy of the inspection form if applicable.

Finding #11: The afterburner temperature minimum limit within the permit is based on stack test results as stated in N005 permit term A.2. on page 7. According to the results of the stack test completed on 08/12/1999 available in this agency's office, the lowest recorded afterburner temperature was 1615°F. However, the temperature setpoint for this unit is at 1400°F, as discussed in Finding #7. Additionally, the previously drafted FESOP T&Cs (from 2005) state the afterburner temperature limit is 1500°F. The afterburner temperature of 1500°F is the same as for N006, which is the most logical permit limit to be used.

Per the discussions during the inspection, the afterburner temperature setpoint should be 1500°F, which would make the permit compliance minimum afterburner temperature 1450°F (per permit term A.2). If this value is used as the permit limit, then 35% of the temperature recordings would be out of compliance from the data submitted for 09/17/2010 via email on 10/18/2010.

Corrective Action #11: Please provide a copy of the stack test afterburner temperature readings and a written proposal of an afterburner temperature minimum based on that data to be used as the permit limit within 30 days of the date of this letter. Upon Agency written approval and request, modify the electronic controls programming so that the afterburner temperature minimum is always achieved. The approved temperature value will be incorporated into the draft FESOP permit to be issued in the near future.

Recordkeeping and Operations for Pacific Kiln Mold Firing Furnace (N006):

The most recent permit for the Pacific Kiln Mold Firing Furnace N006 is PTI 15-01650 issued on 04/01/2008. There was no separate PTO application. The PTI will be the permit referenced in the sections below.

There was no separate PTO application due to the anticipation of the FESOP permit issuance and this emission unit being incorporated into that permit. This was discussed and agreed upon between PCC Airfoils, LLC and this agency. This deficiency will be discussed and a corrective action requested under separate cover.

Finding #12: Per the N006 permit term Part II.C.3., weekly checks for any visible particulate emissions from the stack serving the N006 emission unit are required to be completed. As discussed during the inspection, no visible emission checks are being conducted.

Per the N006 permit term Part II.D.3., semiannual written reports regarding the results of the visible emission checks are to be submitted to this agency. No semiannual reports have been submitted to or received by this agency. This is most likely due to the fact that these checks are not being conducted.

Corrective Action #12a: Immediately start conducting the required weekly visible emission checks. After 30 days from the date of this letter, submit a copy of all the completed visible emission check records that occurred within the timeframe elapsed.

Corrective Action #12b: Please provide a written letter detailing the visible emission deviations that occurred at N006 between 04/01/2008 through 06/30/2010. If no deviations occurred, then state such in the letter. Submit the letter within 30 days of the date of this letter.

Starting with the 2nd semester 2010 (July through December) and due by January 31, 2011, submit the required semiannual deviation report, and continue to do so on a semiannual basis as required by the permit.

Finding #13: Per the N006 permit terms Part I.A.2.b. and Part II.D.1., quarterly written deviation reports are required to be submitted to this agency. Also as part of the permit term Part I.A.2.b., if no deviations occurred during the reporting period, a quarterly report which states that no deviations occurred during the reporting period shall be submitted. No quarterly deviation reports have been submitted or received by this agency.

Corrective Action #13: Please provide a written letter detailing the deviations that occurred at N006 (if any) between 04/01/2008 through 09/30/2010. If no deviations occurred, then state such in the letter. Submit the letter within 30 days of the date of this letter.

Starting with the 4th quarter 2010 (October through December) and due by January 31, 2011, submit the required quarterly deviation report, and continue to do so on a quarterly basis as required by the permit.

- Finding #14:** Daily records are required per N006 permit terms Part II.C.1 and Part II.C.4. Of the records available, only 30 days of data was in the active database and approximately one year of data is kept in archive. Per your permit Part I.A.3, records shall be retained for a minimum of 5 years.
- Corrective Action #14:** Please develop a recordkeeping program to retain all permit required records for the minimum 5 years as required. Submit a written description of the recordkeeping program developed within 30 days of the date of this letter.

During the next onsite inspection, the records for N006 will be reviewed to verify the implementation of the recordkeeping program.

- Finding #15:** Certain data is required to be recorded on a regular basis to comply with the N006 air permit. This data was requested during the inspection for one day per month over the past 6 months as specified by this agency. The requested data was provided via email on 09/28/2010 and 09/29/2010. Within the data submitted via email on 09/28/2010, there is a column for afterburner temperature, which has one temperature value per batch the furnace operated. An explanation of what point during the batch cycle this singular temperature value represents was requested via email on 10/08/2010 but not yet provided.

As discussed during the inspection, the minimum afterburner temperature setpoint is at 1500°F, which is the same minimum afterburner temperature required within the N006 permit term Part II.B.2. In the data submitted via email on 09/28/2010, there were 3 afterburner temperature recordings that were below that setpoint and permit minimum. These are summarized in the table below.

Date	Batch # for day	AB Temperature
09/02/2010	2	1499°F
09/09/2010	1	1497°F
09/25/2010	2	1499°F

During the inspection, it was discussed that there is a low-temperature alarm that will shut down the furnace when the afterburner temperature falls below the setpoint. When does the low-temp alarm go off if the furnace didn't shutdown during the identified 3 times in the table above? Having a low temperature alarm complies with the requirement in the N006 permit term Part II.C.1. However, there are specific actions that are to take place according to the N006 permit terms Part II.B.2. and Part II.C.1.

- Corrective Action #15a:** Please provide a written description of what the temperature data provided via email on 09/28/2010 represents. In the description, answer the specific question that was emailed on 10/08/2010: "Since there is continuous temperature measurement but only one temperature recording per batch, what does that value represent (i.e. minimum temperature for the cycle, average temperature for the cycle, temperature after 1 hour of the cycle start, etc.)?" Submit this written report within 30 days of the date of this letter.

Corrective Action #15b: Please provide a detailed written description explaining how the low-temperature alarm in the electronic controls functions and how it is possible to have temperatures less than the setpoint temperature. Submit this written report within 30 days of the date of this letter.

After your written response is reviewed, a request may be made by this agency for PCC Airfoils, LLC to update your electronic controls programming so the minimum temperature and corrective action records are achieved and maintained.

Finding #16: N006 afterburner inspections are being completed weekly, monthly, bi-monthly, quarterly, and semi-annually. These inspections are recorded on the various electronic maintenance system work orders. A copy of the maintenance work orders was submitted to this agency via email on 10/05/2010. Various items to check during the inspection are specified within the maintenance work orders. Please review the N006 permit term Part II.C.2 to ensure all these specific inspection items are being completed as required.

Per the N006 permit term Part II.C.2, these inspections are only required annually. More frequent inspections are encouraged and do meet the annual permit requirement. Per the N006 permit term Part II.D.2, annual reports summarizing the inspections and corrective actions taken are to be submitted by January 15th. No such reports have been submitted to or received by this agency since the permit issuance on 04/01/2008.

Corrective Action #16a: If necessary, update the details in the inspection maintenance work orders to coordinate with the permit language to demonstrate compliance with the permit term for annual inspections. Submit a copy of the updated inspection maintenance work orders within 30 days of the date of this letter if applicable. If no changes were made, please submit a statement stating such instead.

Corrective Action #16b: Starting with the entire calendar year 2010, submit the annual inspection report due by January 15, 2011. Continue to submit the required annual report on an annual basis as required by the permit.

Finding #17: Per the N006 permit term Part II.B.2., all the N006 furnace gases are to exhaust to an afterburner (thermal oxidizer) which shall operate for the first hour when molds are processed and an additional hour if a low temperature alarm occurred in the first hour. During the inspection, it was discussed that the furnace is not capable of operating without the afterburner operating and that the afterburner operates for approximately 2 hours for every batch processed.

Corrective Action #17: Please provide a detailed written description explaining how the furnace is not able to operate without the afterburner operating and how long and when the afterburner operates during the furnace batch cycle. Submit this written report within 30 days of the date of this letter.

After your written response is reviewed, a request may be made by this agency for PCC Airfoils, LLC to update your electronic controls programming or recordkeeping program to include a means of recording afterburner operating time in relation to length of time the furnace was operating.

Finding #18: Per the N006 permit term Part II.B.2, the afterburner (thermal oxidizer) shall be operated and maintained at a minimum 1.5 seconds residence time. This residence time in the permit is incorrect. Your permit application submitted on 12/18/2006 provided a residence time value of

0.5 seconds, which matches the specification sheet for the N006 furnace that was submitted via email on 09/28/2010. Since the actual residence time value is 3 times smaller than the permit, this will be corrected in the FESOP permit to be issued in the near future.

Corrective Action #18: No Corrective action required at this time. This will be corrected in the FESOP permit to be issued in the near future.

Additional Requests:

Request #1: During the inspection, the spinner/hanger unit installed in 2008 was observed. As discussed during the inspection, a permit to install application was not submitted for this unit since it exhausts inside the plant and does not require a permit. Please provide a written explanation citing the Ohio air pollution regulation that exempts units exhausting inside the plant from receiving air permits. Submit this written report within 30 days of the date of this letter.

Request #2: During the inspection it was discussed that several of the production equipment is shutdown since the operation is now outsourced. Please provide a detailed list of what equipment no longer exists (finishing area, wax area, etc), and a new description for the affected emission units. Also provide a complete updated emission unit list indicating the operational status of each emission unit currently within the facility profile available in eBusiness: Air Services. This can be completed in a letter or by updating the facility profile in eBusiness: Air Services and submitting it to this agency. Submit this within 30 days of the date of this letter.

Request #3: During the inspection the beryllium use at the P077 Barn Vacuum Induction Melt Furnace was discussed. Please submit a written response indicating the last time beryllium was use in P077 and what the plans are for any continued use of beryllium in this emission unit. Complete this within 30 days of the receipt of this letter. Submit this written report within 30 days of the date of this letter.

Table Summarizing of the Corrective Actions & Requests

Below is a table that summarizes the corrective actions and requests detailed above and their due dates. Please refer to the detailed Corrective Actions and Requests listed above for the entire request details.

<u>Corrective Actions / Requests</u>	<u>Due Date</u>
Corrective Actions: #2, #3, #5a, #5b, #6, #7, #8, #9, #10, #11, #12b (first part), #13 (first part), #14, #15a, #15b, #16a, and #17. Requests: #1 through #3	Within 30 days of the receipt of this letter, or by 11/30/2010.
Corrective Actions: #12b (second part), #13 (second part), and #16b.	No later than 01/31/2011.
Corrective Actions: #4 and #18.	No Action Required
Corrective Actions: #1 and #12a.	Start recording immediately Submit records within 30 days of the receipt of this letter, or by 11/30/2010.

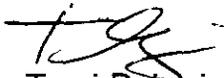
Mr. Richmond
PCC Airfoils, LLC
October 27, 2010
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If you would rather chose alternative corrective actions than those listed above, please submit a written request detailing the alternative corrective actions via mail or email by 11/05/2010 and your request will be considered. If you are not able to provide all this information within the timeframe requested, please send an extension request to me via mail or email along with the date that you can provide the information.

Please Note: The above listed findings are identified non-compliances with the most current issued air permits terms and conditions. As such, all these findings are in violation of OAC 3745-31-05 and ORC 3704.03 as well as the applicable requirements identified in those permits. Due to PCC Airfoils, LLC's good compliance record and this being the first identified violation for more than 10 years, this letter is a warning. If the above corrective actions requested are not completed in a timely manner, it is possible this warning will escalate into a notice of violation.

If you have any questions or concerns in regards to the contents of this letter, please contact me at tdzienis@cantonhealth.org or (330) 489-3385.

Sincerely,



Terri Dzienis
Air Pollution Control Engineer
Canton City Health Department

cc: David Hadzinsky, PCC Airfoils, LLC, 25207 Chargin Blvd, Beachwood, OH 44122
Dan Aleman, APCD, CCHD

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Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$ 5.54

Sent To
DAVID HADZINSKY, PCC AIRFOILS, LLC
Street, Apt. No. or PO Box No. **25207 CHARGIN BLVD.**
City, State, ZIP+4 **BEACHWOOD, OH 44122**

PS Form 3800, August 2006 See Reverse for Instructions

2662 4740 2000 0900 6002

SENDER: COMPLETE THIS SECTION

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- Print your name and address on the reverse so that we can return the card to you.
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1. Article Addressed to:
SCOTTY RICHMOND
PCC AIRFOILS, LLC
3860 UNION AVE SE
MINERVA OH 44657

2. Article Number
(Transfer from service label)

7009 0080 0002 0413 2480

PS Form 3811, February 2004

Domestic Return Receipt

102595-02-M-1540

COMPLETE THIS SECTION ON DELIVERY

A. Signature
 James W. Ratliff Agent Addressee

B. Received by (Printed Name) **JAMES W RATLIFF** C. Date of Delivery **10/29/10**

D. Is delivery address different from item 1? Yes No
If YES, enter delivery address below: **RC**

3. Service Type
 Certified Mail Express Mail
 Registered Return Receipt for Merchandise
 Insured Mail C.O.D.

4. Restricted Delivery? (Extra Fee) Yes

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
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1. Article Addressed to:
DAVID HADZINSKY
PCC AIRFOILS, LLC
25207 CHARGIN BLVD.
BEACHWOOD, OH 44122

2. Article Number
(Transfer from service label)

7009 0080 0002 0413 2497

PS Form 3811, February 2004

Domestic Return Receipt

102595-02-M-1540

COMPLETE THIS SECTION ON DELIVERY

A. Signature
 K. Neubel Agent Addressee

B. Received by (Printed Name) **K. Neubel** C. Date of Delivery **10-29-10**

D. Is delivery address different from item 1? Yes No
If YES, enter delivery address below:

3. Service Type
 Certified Mail Express Mail
 Registered Return Receipt for Merchandise
 Insured Mail C.O.D.

4. Restricted Delivery? (Extra Fee) Yes

**U.S. Postal Service™
CERTIFIED MAIL™ RECEIPT**
(Domestic Mail Only; No Insurance Coverage Provided)

For delivery information visit our website at www.usps.com

Postage	\$.44
Certified Fee	2.80
Return Receipt Fee (Endorsement Required)	2.30
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$ 5.54

Sent To
SCOTTY RICHMOND/PCC AIRFOILS, LLC
Street, Apt. No. or PO Box No. **3860 UNION AVE SE**
City, State, ZIP+4 **MINERVA, OH 44657**

PS Form 3800, August 2006 See Reverse for Instructions

0962 4740 2000 0900 6002