



City of Cleveland

Frank G. Jackson, Mayor

Department of Public Health
Division of Air Quality
75 Erievew Plaza, Suite 200
Cleveland, Ohio 44114-1839
216/664-2297 • Fax: 216/420-8047
www.clevelandhealth.org

SERVING OHIO EPA AS AGENCY 13
FOR CUYAHOGA COUNTY

CERTIFIED MAIL 7002 2030 0001 1807 7828
RETURN RECEIPT REQUESTED

December 7, 2009

Mr. Gary Calhoun
Alcon Industries, Inc.
7990 Baker Avenue
Cleveland, Ohio 44102

FACILITY ID: 13-18-00-7755
RECEIPT OF CORRECTIVE ACTION PLAN: AIR POLLUTION NUISANCE

Dear Mr. Calhoun:

On April 4, 2009, the Cleveland Division of Air Quality (CDAQ) issued a Notice of Violation requesting that Alcon Industries, Inc. (Alcon) adhere to their timeline for their December 8, 2008, corrective action plan that was updated April 6, 2009, and September 29, 2009. CDAQ is in receipt of an update to the corrective action plan dated November 25, 2009, that was received November 30, 2009, stating that Alcon is still attempting to identify and evaluate options for financial assistance for odor neutralizer spray and engineering controls.

Alcon is still expected to comply with updating the progress on their corrective action plan no later than February 15, 2010. Failure to do so may result in referral to Ohio EPA or U.S. EPA for further enforcement action. Fulfillment of your commitments included in the corrective action plan and/or any modifications contained within this letter does not constitute a waiver of CDAQ's ability to refer this matter to Ohio EPA or U.S. EPA for further enforcement action. Please submit any future correspondence related to this matter to the following enforcement representative:

Linda Kimmy
Cleveland Division of Air Quality
75 Erievew Plaza, 2nd Floor
Cleveland, Ohio 44114-1839

CDAQ issues this letter with Ohio EPA's concurrence and does not excuse any violations of local, state and federal laws or regulations regarding air pollution control. Violations of air pollution control laws may be pursued in local court or referred to Ohio EPA or U.S. EPA for further enforcement action. Should you have any questions, please call Linda Kimmy at 216-664-2985. All correspondence with CDAQ must include the Ohio EPA facility identification number for Alcon: 13-18-00-7755.

SENDER COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:
 MR. Gary Calhoun, FAC/comp
 Alcon Industries, Inc.
 7990 Baker Avenue
 Cleveland, OH 44102

COMPLETE THIS SECTION ON DELIVERY

A. Signature Age Add
** Benjamin Butler*

B. Received by (Printed Name) Age Add
 BENJAMIN BUTLER

C. Date of Delivery

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
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4. Restricted Delivery? (Extra Fee) Yes

2. Article Number
 (Transfer from service label) 7002 2030 0001 1807 7628



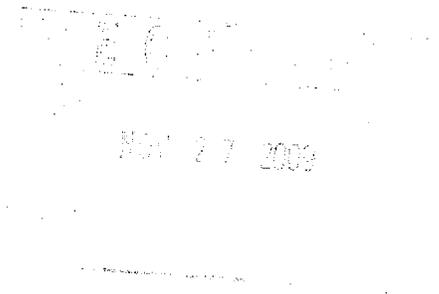
November 25, 2009

Ms. Linda Kimmy
Environmental Compliance Specialist
Ohio EPA - (Agency 13)
Cleveland Division of Air Quality
75 Erieview Plaza, 2nd Floor
Cleveland, Ohio 44114

ALCON INDUSTRIES, INC.
7990 BAKER AVENUE
CLEVELAND OH 44102

Also Via Email: LKimmy@city.cleveland.oh.us

**RE: Plan of Action Update – Nuisance Odors
Alcon Industries, Inc.
7990 Baker Avenue
Cleveland, Ohio 44102
Facility ID: 13-18-00-7755**



Dear Ms. Kimmy:

On behalf of Alcon Industries, Inc. (Alcon) I am pleased to provide you with this update on progress we have made since our last communication to your office dated September 29, 2009. Prompted by nuisance odor complaints from its neighbors, Alcon identified seven actions to be taken in order to further address nuisance odors associated with manufacturing operations

As communicated in our letter dated July 30, 2009, and inadvertently mailed to your office on September 29, 2009, Alcon has completed four action items in the list of seven action item originally proposed by Alcon to address the issues identified in your Notice of Violation (NOV) letter dated April 22, 2009. Two of the remaining action items identify potential capital improvements to potentially address odor emissions at the facility. The two action items that would require capital expenditure are summarized as follows:

Action Item 2: Odor Neutralizer Spray (EcoSorb)

Alcon has reviewed the product EcoSorb as a possible odor neutralizing agent. The product review consisted of a review of the company literature, review of a cost proposal prepared by a representative of OMI Industries (OMI) and a meeting at the Alcon facility with representatives ATC Associates Inc. (ATC) and OMI in October 2008.

T 216.961.1100

F 216.961.5611

W www.alconind.com



Cost Considerations: First year costs for equipment and product ranged from approximately \$20,000 to \$25,000 with subsequent annual costs of approximately \$12,000.

Feasibility: Given the current cost constraints on the company, the ability of Alcon to pursue this option is tied to its ability to obtain financial support. In addition, this option is a less desirable option compared to action item number three below because it relies on masking the odors and may not be consistently effective in doing so.

Current Status: Possible financial support options are being evaluated as indicated in action item number 7.

Action Item 3: Emissions Engineering Controls for Sand Molds

Alcon has reviewed possible air emissions control structures and technology to better control emissions from cooling sand molds. This review began with an internal discussion and vendor identification process where two vendors were identified for further discussion.

- Alcon met with representatives from ATC and Cantonese Applied Technologies, LLC (CAT) in May 2009 to discuss possible emission control options. CAT proposed construction of a room to house cooling sand molds where emissions could be collected and routed through a blower to a single stack. The CAT proposal also included the option for a scrubber.
- Alcon also solicited design and cost information from AER Control Systems (AER) on their emissions control equipment. The AER system would consist of a mold cooling room, blower and stack as above with an optional activated carbon component.

Cost Considerations:

The following first year cost estimates include equipment purchase and installation of only and do not include operation and maintenance cost estimates.

CAT Option 1: Room, blower and stack	\$85,000
CAT Option 2: Room, blower, stack and scrubber	\$235,000
AER Option 1: Room, blower and stack	\$60,000
AER Option 2: Room, blower, stack and carbon unit	\$75,000

Feasibility: Given the current cost constraints on the company, the ability of Alcon to pursue any of the above options is tied to its ability to obtain financial support.

Current Status: Possible financial support options are being evaluated as



ALCON

indicated in action item number 7.

The following provides an update on progress made on action item number seven (i.e., Financial Assistance - Engineering Control Equipment & Installation) on the list of seven action items identified in Alcon's plan of action contained in the letter to the Division of Air Quality (DAQ) dated December 9, 2008.

Action Item No. 7 – Financial Assistance for Engineering Controls

Alcon looked into the possibility of obtaining financial assistance from the Ohio Air Quality Development Authority and the Ohio Department of Development Ohio Energy Office. Alcon contacted representatives with both organizations and obtained information on funding opportunities. Initially, the Clean Air Resource Center (CARC) of the Ohio Air Quality Development Authority (OAQDA) was the only source identified for possible funding. The CARC provides support to small businesses that need support for emission control projects.

At the suggestion of Mr. Darrell Fields with Forbes, Fields & Associates, General Counsel to the OAQDA, Ward 17 Councilman Mark Zone was contacted for information on other potential funding options. Councilman Zone and Ms. Marilyn Mazinski, Community Development Director with the Detroit Shoreway recommended contacting Mr. Jeff Shoykhet, Business Development representative with the City of Cleveland office of Economic Development. Information on possible support options offered by the CARC and the City of Cleveland are summarized as follows.

I. CARC funding options.

1. On-line registration was completed by Alcon.
2. A grant application was completed and submitted by Alcon on October 8, 2009 and it identified the AER option number two project described in action item number three above.
3. Key feedback from the CARC on the grant application included the following:
 - Alcon was eligible as a small business to receive a grant to cover the closing costs on a loan if a loan is selected.
 - If financing is selected, Alcon would select their lender of choice and an application would be run through the CARC.
 - If financing is selected, the CARC provides tax breaks on the initial purchase of products and equipment to be installed for the project.
 - Additional tax breaks are also provided on the products and equipment



financed over the life of the loan.

4. Although there are incentives provided by the CARC for this project, Alcon would have to finance the majority of the project cost (over 96%).

II. City of Cleveland, Office of Economic Development Funding Options.

1. Key feedback from the City of Cleveland on the included the following:
 - There are two programs that Mr. Shoykhet mentioned, the "One Retention Program" targets job retention and another program targets business expansion and job creation.
 - The One Retention Program was established to help businesses who could not get financing for buying inventory. The program provides low interest (currently at 2.84%) loans up to \$200,000 and could be used for the air emissions control project. The program also provides deferred payments for the first three months of the loan term.
 - The One Retention Program is currently out of money for this year but is expected to be refunded in 2010. In 2009, the program provided \$3.2 million in loans to businesses.
 - Mr. Shoykhet is also going to ask internally if the CARC program could be used in conjunction with their program.

Feasibility: Given the current financial constraints on the company, the ability of Alcon to finance the AER option number 2 described above of approximately \$75,000 for engineering controls is currently not possible.

Current Status: Alcon is currently evaluation the feasibility of pursuing the project utilizing the financial support options identified above.

Please do not hesitate to contact me with any questions you may have about this response.

Sincerely,
Alcon Industries, Inc.

Gary Calhoun
Facilities / Compliance Manager

cc: Scott McCready, ATC Associates Inc.