

AKRON REGIONAL
AIR QUALITY MANAGEMENT DISTRICT

Agent of the Ohio Environmental Protection Agency • Division of the Akron Health Department
Serving Medina, Portage and Summit Counties

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L. M. Malcolm, P.E.
Administrator

August 15, 2008

Certified Mail
Notice of Violation (non-HPV)

Mr. Earl Hamlin
Procex LTD
880 Cherry Street
PO Box 628
Kent, Ohio 44240

Dear Mr. Hamlin:

This Notice of Violation (NOV) is in response to an ongoing complaint investigation regarding excessive emissions and odors from your coating removal operations. The first two sections of this NOV contain applicable particulate emissions requirements, followed by relevant investigative observations/air pollution rule/law violations, for specific manufacturing operations. The third section addresses failure to obtain an air Permit to Operate (PTO) for one of your emissions units. The fourth section addresses violations of the Ohio EPA air pollution nuisance prohibition. The final section of the NOV requests a compliance plan that resolves the regulatory problems at your facility. (The Akron Regional Air Quality Management District (ARAQMD) is a contractual agent for Ohio EPA responsible for enforcing air pollution regulations in Summit, Portage, and Medina Counties.)

OEPA Emissions Unit IDs P003, P005, P007/Company IDs Inductor #4 (50 KW), Inductor #3 (35 KW), and Inductor #2 (200 KW), Respectively

The inductors are intended as the primary tools to heat metal parts coated with rubber and other materials, weakening the metal/coating bond, to facilitate removal of the coatings. All three inductor stations, which (except for power rating) are similar sources, are hooded and vented to a common wet scrubber. These three emissions units and the wet scrubber normally operate during four work shifts (each work shift runs from 9:00 p.m. until 8:00 a.m. - 10 hours work, plus 1 hour for lunch and breaks), from Monday night to Friday morning, each week.

The inductor stations are subject to the requirements of Ohio Administrative Code (OAC) rules 3745-17-07 "Control of visible particulate emissions from stationary sources" and 3745-17-11 "Restrictions on particulate emissions from industrial processes." OEPA has determined that OAC rule 3745-17-11 is applicable, since emissions from the inductor stations are vented to the ambient air through stacks, i.e., scrubber stack and building ventilation stacks. Note that this applicability determination is different from the rule previously indicated by ARAQMD.

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The applicable visible particulate emissions limitation from OAC rule 3745-17-07 is twenty percent opacity from any stack, as a six-minute average, except as provided by rule. OAC rule 3745-17-11 limits particulate emissions based on either maximum process weight rate (PWR) or uncontrolled mass rate of emissions (UMRE). It is estimated that the UMRE for each inductor station is less than 10 pounds per hour, thereby making Figure II not applicable. Therefore, the applicable limitation from OAC rule 3745-17-11, Table I (based on an estimated maximum PWR from coatings for each inductor station of less than 100 pounds of coatings per hour) for total stack particulate emissions appears to be 1.65 pounds per hour (three emissions units at 0.551 pound per hour each).

Observations by ARAQMD staff have shown three significant sources of uncontrolled visible particulate emissions: (1) emissions that overwhelm hood collection capacity and continuously bypass the hoods at all three inductor stations; (2) smoldering rubber removed from heated metal parts and the corresponding reclaimed hot metal parts placed in open collection bins or other devices or areas inside the building not served well by emissions capture; and (3) inductive heating not under a hood, typically for large parts, but also careless work habits of not maintaining parts under the hood. The poor collection efficiencies of the hood capture systems and the virtual absence of emissions capture for the other above-mentioned operations cause the building to fill with smoke, resulting in emissions not being vented to the scrubber and escaping uncontrolled through building roof stacks.

Method 9 readings recorded by ARAQMD staff on the scrubber stack and various roof stacks serving the inductor stations, which indicate visible particulate emissions exceeded twenty percent opacity, as a six-minute average, are shown below on the following dates:

June 6, 2007 (morning), six-minute average opacities of 42%, 28%, 36%, and 46% for the roof stack identified as "skinny stack" (18" diameter stack located at the Cherry Street side of building, above the 50 KW inductor station).

June 21, 2007 (morning), six-minute average opacities of 48% and 48% for the roof stack identified as "Stack #2" (36" diameter stack located at the west-end of building, with a flat-plate rain cap).

June 21, 2007 (evening), six-minute average opacities of 54% and 30% for the roof stack identified as "Stack #2" (36" diameter stack located at the west-end of building, with a flat-plate rain cap).

July 11, 2007 (morning), six-minute average opacities of 28% and 31% for the wet scrubber stack.

These Method 9 readings, which exclude the highest six-minute average over 20% opacity on each date, constitute violations of the visible particulate emission limitation from OAC rule 3745-17-07 and ORC § 3704.05(A) and (G).

Procex must improve its capture hoods and redesign its building vents, not only as a requirement

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to assist emissions control, but also to minimize the number of stacks that must be simultaneously tested to determine compliance with OAC rule 3745-17-11. The most cost-effective way to do this is to capture all uncontrolled emissions and vent them to a more efficient and larger control device, so that testing is limited to one stack, namely, the control device stack.

After mandatory effective capture/venting corrective actions are completed, as specified above, OEPA requests Procex conduct formal stack testing to evaluate compliance with OAC rule 3745-17-11. In order to accomplish this testing, Procex shall conduct Method 5 tests on the control device stack venting particulate emissions from all inductor stations operating simultaneously.

Keep in mind, significant visible emissions were observed from the scrubber stack, some of which exceeded the applicable limitation from OAC rule 3745-17-07. This questions the ability of the current wet scrubber to handle additional emissions inlet loading and comply with the applicable limitations from OAC rules 3745-17-07 and 3745-17-11. During a meeting with OEPA on March 12, 2008, you seemed to indicate a willingness to install not only capture/ventilation improvements, but also to replace the current wet scrubber with a more effective control device.

Please be aware, if stack testing is conducted as specified above on the current wet scrubber, test results may indicate noncompliance with applicable emission standards, requiring Procex to upgrade to a more effective particulate emissions control technology (e.g., a venturi scrubber system) in order to curb emissions to achieve compliance with OAC rules 3745-17-07, 3745-17-11, and 3745-15-07.

OEPA Emissions Unit ID P006/Company ID Salt Bath

The salt bath is intended as secondary treatment of coated metal parts to remove residual coating material missed by the inductor stations. Emissions from the salt bath are uncontrolled and exhausted to the ambient air principally through twin roof stacks above the salt bath location. This emissions unit normally operates during four work shifts (each work shift runs from 9:00 p.m. until 8:00 a.m. - 10 hours work, plus 1 hour for lunch and breaks), from Monday night to Friday morning, each week.

The salt bath is electrically heated and remains turned on and powered up around the clock (24/7), maintaining the salt, in a molten state, continuously at normal operating temperature. The molten salt is a mixture of two parts sodium nitrate and one part sodium nitrite. The molten salt does not appear to bubble, when the salt bath is idle (i.e., not processing parts) at normal operating temperature, which indicates the molten salt mixture is maintained at an operating temperature below the respective boiling points of the sodium nitrate (716 °F, decomposes, from CRC Handbook of Chemistry and Physics, 73rd edition) and sodium nitrite (608 °F, decomposes, from CRC Handbook of Chemistry and Physics, 73rd edition).

The salt bath is cleaned at the end of a work shift by dredging the bottom of the salt bath with a flat-

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bottom shovel. After cleaning, salt lost is replenished by adding two parts sodium nitrate to one part sodium nitrite. Salt is normally lost from the salt bath when the cleaning shovel removes a slurry of salt with melted and sometimes chunks of unmelted coating material too heavy to float to the top of the molten salt. Salt is also normally lost from the salt bath during the removal of a basket of processed and cleaned parts. The quantity, size, and shape of the parts, as well as the amount of time parts are allowed to drip free of molten salt, determine how much salt is retained with the parts during parts removal, and consequently how much salt is lost from the salt bath. Other quantities of salt can be lost from the salt bath from improper introduction of parts into the salt bath, parts containing too much coating material, or parts with reactive coatings, causing an overflow of salt onto the plant floor. Air emissions of salt may, to a lesser extent, make up the balance of salt lost and replenished.

Historically, the salt bath was regulated by OAC rule 3745-17-11, as established in Permit to Install (PTI) 16-00484, issued final October 16, 1986. OAC rule 3745-17-11 restricts particulate emissions from industrial processes by establishing allowable particulate emission rates based on process weight rate or uncontrolled emissions. From updated information provided by your consultant last year, a new regulatory determination appears to indicate OAC rule 3745-17-09 "Restrictions on particulate emissions and odors from incinerators" as being more applicable than OAC rule 3745-17-11 to regulate particulate emissions from the salt bath. Therefore, the salt bath shall be regulated by OAC rule 3745-17-09 instead of OAC rule 3745-17-11. This determination is consistent with the recommendation made by the company's consultant, GT Environmental, Inc.

OAC rule 3745-17-09 limits particulate emissions based on a material charging rate. Per OAC rule 3745-17-09, particulate emissions shall not exceed 0.10 pound per one hundred pounds of material charged, for units having capacities equal to or greater than one hundred pounds per hour; or 0.20 pound per one hundred pounds of material charged, for units having capacities less than one hundred pounds per hour. Based on a maximum capacity of 600 pounds of material charged per hour (from production information provided in a March 9, 1998 PTO application), the particulate emission limitation for the salt bath is 0.60 pound/hour. The emissions unit also is subject to the requirements of OAC rule 3745-17-07 "Control of visible particulate emissions from stationary sources." The applicable visible particulate emissions limitation from OAC rule 3745-17-07 is twenty percent opacity from any stack, as a six-minute average, except as provided by rule.

Observations by ARAQMD staff have indicated, during normal use of P006 (i.e., secondary treatment of coated metal parts), visible emissions from the salt bath stacks due to what appears to be residual combustible coating material, not removed by induction heating, flaking off the metal parts, at and/or floating to the salt bath surface, spontaneously igniting into flames. On each of June 8, June 18, and June 21, 2007, Method 9 readings indicated visible particulate emissions exceeded twenty percent opacity, as a six-minute average, for more than six consecutive minutes. Also on June 21, Method 9 readings showed visible emissions of more than sixty percent opacity, as a six-minute average. These exceedances constitute violations of the allowable visible emission

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limitations from OAC rule 3745-17-07. You informed ARAQMD that one of the exceedances was caused by improper use of the emissions unit. The salt bath shall only be used to remove residual coating material after manual stripping at the inductor stations, not the gross removal of material. Please remind your employees not to employ the salt bath for gross removal of coating materials.

Emissions unit P006 lacks reliable emissions information. PTI 16-00484 established an allowable emission rate based on a questionable best available technology (BAT) determination. Last year, Procex submitted an application to increase the permit allowable particulate emissions rate (before the submission of updated information and new regulatory determination indicated OAC rule 3745-17-09 is applicable instead of OAC rule 3745-17-11). Based on visible emissions consistently observed from P006, while in operation, some of which were in violation of OAC rule 3745-17-07, and due to a general lack of knowledge concerning P006, OEPA requests that Procex conduct simultaneous Method 5 tests on the twin stacks venting particulate emissions from the salt bath to the ambient air. Results from the stack testing shall establish potential uncontrolled particulate emissions from the salt bath for the purpose of determining compliance with OAC rule 3745-17-09. For convenience, the testing date of P006 may be coordinated with the testing of the wet scrubber.

Please be aware, if results from stack testing P006 indicate noncompliance with the mass particulate emission limitation, there is a continuation of visible emission violations, and/or the salt bath is causing a continuation of the air pollution nuisance, OEPA shall require Procex to implement appropriate measures to curb emissions to achieve compliance with OAC rules 3745-17-07, 3745-17-09, and 3745-15-07.

Air Permit to Operate

OAC rule 3745-35-02(A) stated, in part, "No person may cause, permit, or allow the operation or other use of any air contaminant source without applying for and obtaining a permit-to-operate from the director in accordance with the requirements of this rule" (This rule was recently replaced by new permit to install and operate requirements.)

Based on Agency records, your facility does not have a current air PTO for emissions unit P007, Inductor #2 (200 KW), and there is no record at this Agency that you, or the former owner of Procex, ever applied for a PTO for P007. This was a violation of OAC rule 3745-35-02(A) and ORC § 3704.05(G).

Air Pollution Nuisance

OAC rule 3745-15-07 "Air pollution nuisances prohibited" states, in part, the emission or escape into the ambient air from any source or sources whatsoever, of smoke, ashes, dust, dirt, acids, fumes, gases, vapors, odors, or any other substances or combinations of substances, in such manner or in such amounts as to endanger the health, safety or welfare of the public, or cause unreasonable injury

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or damage to property, is hereby found and declared to be a public nuisance. It shall be unlawful for any person to cause, permit or maintain any such public nuisance.

During investigative observations last summer on June 6, 7, 8, 12, 13, 14, 15, 18, 19, and 21, and July 9, 10, 11, and 13, ARAQMD staff witnessed heavy clouds of smoke and intense burnt rubber odors moving beyond your facility's fence line to neighborhood residential and commercial properties. On several nights of these observations, Overholt Road, east to Mogadore Road, filled with heavy haze and/or very strong burnt rubber odors from Procex. During one of these nights, ARAQMD staff were forced to leave the observation point, which was off your facility's premises, because the intensity of haze and odor caused breathing problems and stinging eyes. Similarly, on another night, heavy haze and strong burnt rubber odors from your facility were witnessed in the residential neighborhood across the Cuyahoga River north of your facility.

The June 2007 ARAQMD investigative observations of Procex recorded on field notes are summarized in the 3-page attachment to this NOV. The July 2007 investigative observations of Procex recorded on field notes, although not provided with this NOV, tell a similar story and are available for review.

ARAQMD's last summer observations of Procex characterize the typical manner in which the company operates and the impact manufacturing operations at Procex have on the ambient air in the surrounding communities, and are consistent with described conditions in complaints against Procex. Over the past two summers, when residents and businesses have windows and doors open, ARAQMD has received many complaints regarding nuisance emissions from Procex. One complainant logged incidents of burnt rubber odor and smoke emissions from your facility from 2004 to present. Twelve workers at a nearby company on Overholt Road last year submitted a written complaint of ongoing smoke and odor problems against your facility. Operating in this manner presents a nuisance to the surrounding communities and constitutes a violation of OAC rule 3745-15-07.

To eliminate the nuisance caused by the inductive heating operations, we believe Procex must effectively eliminate all sources of uncontrolled visible particulate emissions, and capture and vent all particulate emissions from the three inductors and all associated operations to a more efficient and larger control device. Building stacks or any other egress point(s), other than an effective emissions control device, must no longer be used to vent particulate emissions from inductive heating operations.

Compliance Plan

Please respond to this letter by September 15, 2008 by submitting a compliance plan and schedule to achieve compliance with applicable air pollution control requirements and perform the necessary emission tests. The compliance plan is requested to contain specific steps or actions that will be

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undertaken by Procex to achieve compliance in a timely manner with applicable requirements along with corresponding specific target dates or deadlines. Keep in mind, the target dates or deadlines may need to be modified to satisfy OEPA compliance progress demands.

The compliance plan is requested to specifically address: elimination of uncontrolled visible particulate emissions from all inductor stations through implementation of effective capture and ventilation improvements, such that all particulate emissions from the three inductors are captured and vented to the wet scrubber, or if necessary, a more effective emissions control device; elimination of uncontrolled visible particulate emissions from the smoldering scrap rubber and reclaimed metal; elimination of uncontrolled visible particulate emissions from parts too large to be processed at an inductor station; and elimination of uncontrolled visible particulate emissions through work practice improvements; and elimination of the public nuisance condition. The compliance plan must also provide for source testing to establish the compliance status of the inductors with the applicable allowable limitations from OAC rule 3745-17-11, and source testing to determine uncontrolled particulate emissions from the salt bath to establish the compliance status of the salt bath with the applicable allowable limitation from OAC rule 3745-17-09. Again, be aware that the scrubber control efficiency may need to be improved to handle increased emissions inlet loading due to capture remedial actions. Also, the compliance plan shall address how the company will ensure ongoing compliance for the visible and mass emissions from the salt bath.

The acceptance of a plan and schedule to resolve the air pollution violations in this case in no way waives the right of Ohio EPA or U.S. EPA to pursue additional enforcement action in this matter. Note that State law allows for monetary penalties of up to \$25,000 per day per violation. The decision to pursue or decline to pursue additional enforcement action will be made at a later date.

If you have any questions, please contact our office at 330-375-2480 or 800-589-2480.

Sincerely,



Russell Risley
Air Quality Engineer II

c: OEPA\Tom Kalman
Jim Oriemann
Mark Glasgow
ARAQMD\Frank Markunas
Lynn Malcolm

Enclosure

ATTACHMENT (page 1/3)
(Summarization of June 2007 Investigative Observations of Procex Ltd.)

June 6, 2007, morning daylight, winds 0 - 3 mph, overcast sky. Heavy visible emissions seen from the wet scrubber stack and two other stacks, causing large clouds of grayish smoke to drift east/southeast from your facility and burnt rubber odors of intensity level two at the Cherry Street/Mogadore Road intersection and intensity level one at the Cherry Street/State Route 43 intersection.

June 7, 2007, morning daylight, winds calm. Visible haze (smoke) seen leaving Procex and moving east/northeast across the Associated Redi-Mix Concrete (ARC) facility on the other side of Cherry Street from Procex. Burnt rubber odors of intensity level two were noticed on the ARC property. Burnt rubber odors of intensity level one were noticed in the residential area east/northeast, across the Cuyahoga River, from Procex. The ARC plant manager said he sees smoke and smells burnt rubber from Procex often when he arrives for work in the morning.

June 8, 2007, morning daylight, winds 5 - 10 mph out of south/southwest, clear sky. Very heavy visible emissions seen exiting the twin salt bath stacks (with some Method 9 readings of the stacks at or near 100% opacity), moving north/northeast away from your facility. At times, the salt bath stacks were emitting in a fashion similar to the explosive eruption of a volcano.

June 12, 2007, predawn, winds calm, clear sky. Scrubber stack emitting. Heavy visible emissions, seen exiting the salt bath stacks and two other stacks, were drifting south. Later, winds calm, heavy smoke plume from salt bath rose vertically. Burnt rubber odors of intensity level three and ground-level smoke haze noticed around Procex facility and along Overholt Road to Mogadore Road. Best way to describe the haze is like fog. The outline of light from street lights and car headlights was evident. After dawn, noticed burnt rubber odors of intensity level two and hazy air along Mogadore Road between Overholt Road and Cherry Street, and along Overholt Road at Procex and a nearby company. During the last twenty minutes of Procex operations, noticed ground-level haze/smoke contributions from Stack #2 located at western end of Procex building. Also, scrubber stack began belching heavy smoke. Overholt Road odors and haze slowly decreasing, but still lingering after the end of the Procex night/morning shift.

June 13, 2007, predawn, no winds, calm, clear sky. Burnt rubber odors of intensity level two and smokey haze noticed around properties on Overholt Road. Scrubber plume straight up. Near dawn, scrubber plume heavy and arcing southward. Emissions from Stack #2 causing additional haze on Overholt Road. The ambient air in areas affected by Procex operations appear foggy, similar to the previous night/morning shift described above.

June 15, 2007, predawn, light wind out of east, partly overcast sky. Inside of Procex building smokey. Stack #2 emissions and salt bath emissions cause smokey haze and burnt rubber odors of intensity level 1 on Overholt Road near Procex. Later, winds out of east/southeast. Scrubber emitting. Large pressure vessel inductively heated, while not under a hood, producing a lot of uncontrolled visible emissions. Inside of Procex building all smokey and murky, making production workers hard to distinguish. Haze drifting from Procex across Cherry Street. Burnt rubber odors

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(Summarization of June 2007 Investigative Observations of Procex Ltd.)

of intensity level 2 noticed at Associated Redi-Mix Concrete (ARC) facility entrance. After work shift ended, witnessed cleaning salt bath and salt replenishment with 14 bags (50 pound bags) of sodium nitrate and 7 bags (50 pound bags) of sodium nitrite.

June 18, 2007, evening daylight, light wind out of east/southeast, clear sky. Heavy scrubber plume. Thick fog of smoke inside Procex building. Another stack at west end of Procex discharging causing heavy haze on west end of building roof. Heavy cloud of smoke drifting west/northwest from Procex. Extremely heavy uncontrolled visible emissions seen inside building bypassing 50KW and 200KW inductor station hoods. A large pressure vessel, similar to the one described in the June 15, 2007 observation, worked on without emissions capture. Heavy, heavy smoke inside Procex building. Production workers hard to discern. Later, heavy discharge from salt bath. Very high Method 9 readings, some 100% opacity, at west salt bath stack. During one Method 9 reading, flame or spark appeared to exit west salt bath stack. Inside building, noticed flames about 10 feet high from salt bath, lasting 3 minutes. Later, noticed persistent haze and burnt rubber odors of intensity level 2 in residential area across Cuyahoga River west/northwest of Procex. Area here looks foggy. Similar to previous observations, the outline of light from street lights and car headlights was evident. Later, heavy smoke plumes from salt bath and scrubber. Flames once again seen inside Procex building from salt bath. Inside Procex building extremely smokey. Later, very heavy and steady plume of emissions from scrubber drifting north/northwest. Cherry Street at a facility west of Procex haze with burnt rubber odors of intensity level 1. A lot of haze looking east on Cherry Street to Procex. Later, heavy haze and burnt rubber odors of intensity level 3 noticed in residential area across Cuyahoga River north/northeast of Procex. This area very foggy, and again, the outline of light from street lights and car headlights was evident, even more than earlier observed. These conditions persisted as observations ended about midnight.

June 19, 2007, evening daylight, winds calm, broken clouds. Both salt bath stacks emit tremendous blast of smoke (similar to volcano) yellow/brown in color (est. 100% opacity, no background seen behind plume). Salt bath plume drifting south and falling to ground. West end of Procex building on roof all hazy/smokey. Overholt Road filling up with smoke and haze. Later, huge discharge from salt bath with flames, as viewed outside through Cherry Street window. Procex building all filled with very thick smoke. The 35KW and 200KW inductor stations billowing smoke, with no capture by hoods. The 50KW unit has make-shift plywood enclosure, but not effective – smoke mostly escaping capture. Later, Overholt Road very smokey/hazy with burnt rubber odors of intensity level 3 down to Mogadore Road. Corner of Cherry Street/Mogadore Road slight burnt rubber odor of intensity level 1. Later, huge discharge from salt bath. Smoke all around building and Overholt Road. Smoke drifting east/southeast. Overholt Road haze shows outline of light from street lights and car headlights. Later, very heavy smoke from scrubber. These conditions persisted as observations ended about 10:30 p.m.

June 21, 2007, morning daylight, winds 1 - 3 mph out of west/southwest, clear sky. Heavy smoke pouring out of Stack #2 and southwest corner stack. Method 9 performed on Stack #2 showed readings up to 70%. Building all covered in haze from smoke at about 50% opacity. Smoke drifting

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(Summarization of June 2007 Investigative Observations of Procex Ltd.)

east/northeast. Smoke and burnt rubber odors of intensity level 2 along Cherry Street before Mogadore Road. Burnt rubber odors of intensity level 1 to 2 at Cherry Street/Mogadore Road intersection, and intensity level 1 along Mogadore Road.

June 21, 2007, evening daylight, winds 3 - 5 mph out of north/northwest/northeast, clear sky. Stack #2 emits heavy smoke. Burnt rubber odors of intensity level 3 at City of Kent maintenance garage (Method 9 observation point). Later, ground-level smoke extremely heavy and burnt rubber odors of intensity level 4 on Overholt Road and City of Kent maintenance garage. Eyes hurting/stinging and breathing difficult. Must leave observation point. Area too irritating from smoke and odors. Before leaving area, Method 9 readings on Stack #2 were up to 80% opacity. Method 9 readings on salt bath stacks also were up to 80% opacity. Both Stack #2 and the salt bath stacks showed noncompliance with applicable visible emission requirements. Later, significant smoke escaping capture at 35KW, 50KW, and 200KW inductor stations. Salt bath burning unattended with moderate flames for about 20 minutes. Workers should skim off floating combustible materials to mitigate the burning. Later, scrubber plume extremely heavy. Very heavy smoke, emitted from Stack #2, the southwest corner stack (Stack #1), scrubber stack, and salt bath stacks, drifting southward. The whole sky south of the Procex plant filled with smoke. Later, 50KW inductor station with make-shift plywood enclosure allowing smoke to escape capture. Smoke pouring out of front of containment and from cracks between plywood panels. Scrubber smoke plume very heavy again. Inside Procex building full of smoke. Overholt Road filled with smoke and haze with odors of intensity level 3 and 4. Smoke everywhere on Overholt Road from Procex facility. These conditions persisted as observations ended about 11:00 p.m.