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L. M. Malcolm, P.E.
Administrator

December 5, 2008

Certified Mail

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

Re: September 11, 2008 proposed compliance plan and schedule

Dear Mr. Hamlin:

I am writing you to provide Ohio EPA's and ARAQMD's reaction to your correspondence of September 11, 2008. In that correspondence, you detail Procex's response to the Notice of Violation (NOV) issued August 15, 2008. While we appreciate Procex's willingness to discuss control measures to address the air pollution problems at its facility, we cannot agree to the timelines proposed by Procex, and it is necessary to clarify some of the factual positions Procex maintains in the September 11th letter.

1. Inductor Units (P003, P005, and P007)

As Procex indicated in its September 11th response, Ohio EPA and ARAQMD believe that the inductor units are subject to the requirements of OAC Rule 3745-17-11, since the emissions are vented to the ambient air through stacks. Procex appears to agree with this regulatory approach, but the company maintains that "it is not reasonable to expect, nor is it possible, to capture 100% of the emissions from the operations of the inductors." While the accuracy of Procex's position is debatable, we maintain that it is in the company's best interest to capture all (or as much as possible) of the emissions and vent the captured emissions to a control device. This will minimize the number of stacks that the company will have to test for any compliance demonstration. Furthermore, all uncontrolled stacks with visible emissions will need to be included in the testing along with the controlled stack.

After reviewing the compliance schedule proposed by Procex for the inductors, Ohio EPA and ARAQMD feel that a swifter, more aggressive schedule is necessary to address the air quality issues at the Procex facility. Specifically, January 2010, and beyond if additional control measures are needed, is too long and does not ensure that compliance will be timely attained for the inductors. Furthermore, your compliance plan does not provide project drawings of ventilation duct-work, air flow rates, emission pickup points, design specifications for the new wet scrubber, emissions capture and control efficiencies, and associated capital and operating costs. Finally, contrary to the position asserted by

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Procex, compliance is required by rule and law and cannot be conditioned on "receipt of adequate funding." Please resubmit a detailed compliance plan and expeditious schedule that address the deficiencies specified above, for the three inductors, by January 1, 2009.

2. Salt Bath (P006)

While we agree that OAC Rule 3745-17-09 is the appropriate emission control rule for the salt bath at the facility, your letter implies that ARAQMD and Ohio EPA reached this conclusion without input from your company. In point of fact, your own environmental consultant proposed this regulatory option as a way to address the emission concerns at your facility. Since the option of using OAC Rule 3745-17-09 was raised by Procex, it is reasonable to assume that the company fully investigated the rule's applicability to its operations and that additional time to analyze applying the rule is unnecessary.

Records retained by ARAQMD concerning the salt bath at Procex reveal a historical maximum charge rate of 600 lbs/hr. In its September 11th response, Procex cites a maximum charge rate of 3,416 lbs/hr. We are interested in how the company determined this new maximum charge rate and request a time/date to witness formal verification of the salt bath maximum charge rate. Please remember that the maximum charge rate shall be determined before emission testing for the salt bath is conducted. Furthermore, we suggest that the charge rate testing be performed during daylight hours in order to correlate production with visible emissions.

The compliance plan and schedule proposed by Procex regarding the salt bath seems appropriate and Ohio EPA and ARAQMD find it acceptable.

3. Nuisance issues at the Procex facility

Contrary to the suggestion made by Procex in recent correspondence, ARAQMD and Ohio EPA are not demanding that the company eliminate all odors emanating from the facility. However, we do expect the company to operate in a manner consistent with Ohio's air pollution laws and rules. Furthermore, Procex must take all necessary measures to ensure that operations at its facility do not present an air pollution nuisance to the surrounding community. We feel this can be quickly accomplished if Procex follows the guidance set out above, submits the necessary permit applications and timely implements any required control strategies. Anything less may subject Procex to increased enforcement.

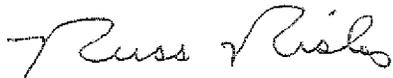
In an effort to ensure that the parties continue to move towards timely implementation of the compliance goals set out above, we expect Procex to respond to the information requests set out above and submit a revised compliance schedule for all three inductor units by January 1, 2009.

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The acceptance of a compliance plan and schedule to resolve the air pollution violations in this case in no way waives the right of Ohio EPA and U.S. EPA to pursue additional enforcement action in this matter.

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

Sincerely,



Russ Risley
Air Quality Engineer II

c: OEPA\Tom Kalman
Jim Orlemann
Marc Glasgow
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Lynn Malcolm