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April 29, 2011

Mr. Nedin Bahtic
Florida Department of Environmental Protection
Southwest District
13051 North Telecom Parkway
Temple Terrace, Florida 33637-0926

Dear Mr. Bahtic:

ArrMaz Custom Chemicals would like to provide additional information with respect to concerns that were expressed during your site visit on April 19, 2011.

Reaction Kettle #5 – Batch Size Exceedance

The old internal heating and cooling coils were removed from the inside of the reaction kettle, increasing the amount of usable space inside the vessel. Please be advised that ArrMaz will prepare and submit a permit modification to increase the batch size. Until such time as this permit amendment is approved, ArrMaz will limit the batch size. This limitation has been communicated to all affected plant personnel.

Scrubber pH Measurement – Documentation

There was a malfunction with the pH meter, probably due to a lightning strike. A new meter was ordered, and plant personnel have been instructed to utilize alternate methods of pH documentation whenever there is an issue malfunction with the pH meter readout. An approved alternate method to document compliance is to verify the pH in our QC. In addition, plant personnel can also record the value directly from the pH meter if it is only the computer screen readout that is incorrect.

Reaction Kettles Scrubber – Delta P

There were times when the Delta P was greater than 2 inches or water, which indicates potential issues with the equipment. ArrMaz will modify the form to include a "notes section" where operators can comment on how the high Delta P was addressed. Since there is not a section for this on the current form, it gives the impression that no action was taken.

Steve Basarab e-mailed electronic copies of the process parameters that you requested last week. Please let us know if there is any other additional information that you require in order to complete your inspection report.

Sincerely,

A handwritten signature in black ink that reads "Jacalyn McCarthy". The signature is fluid and cursive, with a long horizontal line extending from the end.

Jacalyn McCarthy
Arr-Maz Custom Chemicals
HSE Director