



— PSC METALS, INC. —



Via Certified Mail - Return Receipt Requested

March 27, 2017

Compliance Tracker (AE-17J)
Air Enforcement and Compliance Assurance Branch
EPA, Region 5
77 West Jackson Boulevard Chicago, Illinois 60604
Email: r5airenforcement@epa.gov

**RE: Proceeding to Assess a Civil Penalty Under Section 113(d) of the Clean Air Act:
CAA-05-2017-0010; PSC Metals, Inc., Mayfield Heights, Ohio
Paragraph 38 of the Consent Agreement and Final Order, SEP Completion Report**

To Whom it May Concern:

This letter is the SEP Completion Report and documents that PSC Metals, Inc. ("PSC") has completed the Supplemental Environmental Project, as required in the Consent Agreement and Final Order ("CAFO") referenced above, Paragraph 38, as follows:

Supplemental Environmental Project

38. *Respondent must submit a SEP completion report to EPA within 45 days from the effective date of this CAFO. This report must contain the following information:*
- a. *Documentation that a payment was made by PSC to the Knox County Public Schools; and*
 - b. *Statement from the Knox County Public Schools certifying that the money was received and has been put towards the BAS Project or a copy of a signed agreement between PSC and Knox County Public Schools specifying that the funds provided by PSC will be used for the BAS Project.*

38.a. Documentation that a Payment was Made

Pursuant to communication with EPA, the effective date of the CAFO was February 9, 2017. On March 6, 2017, William Hansard, PSC Director of Environmental Affairs, sent a check in the amount of \$60,000 to Knox County Schools (PSC Check No. 406564) along with a letter agreement addressed to Zane Foraker, BAS Project Manager, Knox County Schools. The letter package was received and signed for by Knox County Schools on March 8, 2017, as shown in Attachment 1, Certified Mail Domestic Return Receipt.

Compliance Tracker (AE-17J)
Air Enforcement and Compliance Assurance Branch
EPA, Region 5
March 14, 2017
Page 2 of 2

38.b Statement and Signed Agreement from Knox County Public Schools

Mr. Zane Foraker wrote a letter to Mr. Joe King, Vice President and General Counsel of PSC Metals, Inc., dated March 9, 2017, confirming receipt of the \$60,000 check and stating that "Knox County Public Schools intends to put the money received from PSC Metals toward a Building Automation System ("BAS") which is part of an Energy Conservation Project at Farragut Middle School in Knoxville, Tennessee." This letter is enclosed as Attachment 2.

Mr. Foraker also signed and returned the letter agreement sent to him by William Hansard on March 6 for the BAS project. This letter agreement was prepared to meet the requirements of paragraph 38 of the CAFO and is included as Attachment 3.


Summary

PSC has completed all of the requirements for the SEP Completion Report, as stated in the CAFO paragraphs 34-40 and requests that EPA notify PSC in writing that it has met these obligations, as provided in paragraph 41 of the CAFO. The following certification for the SEP completion report is required pursuant to paragraph 40 of the CAFO.

I certify that I am familiar with the information in this document and that, based on my inquiry of those individuals responsible for obtaining the information, it is true and complete to the best of my knowledge. I know that there are significant penalties for submitting false information, including the possibility of fines and imprisonment for knowing violations.

Sincerely yours,

PSC Metals, Inc.



Joseph King
Vice President
PSC Metals, Inc.

Cc: William Hansard, Director of Environmental Affairs, PSC Metals
Doug Cohen, Counsel, Brown and Rudnick
Jose C. de Leon, Office of Regional Counsel, USEPA
Regional Hearing Clerk (E-19J)

ATTACHMENT 1

PSC Metals, Inc.

Proceeding to Assess a Civil Penalty Under Section 113(d) of the Clean Air Act:
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Paragraph 38 of the Consent Agreement and Final Order, SEP Completion Report

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3.
- 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:

ZANE FORAKER
KNOX CO. SCHOOLS
900 EAST 5TH AVE.
KNOXVILLE, TN 37917



9590 9402 2590 6336 4076 74

Transfer from service label

7036 0750 0000 4062 8996

COMPLETE THIS SECTION ON DELIVERY

A. Signature Agent
[Signature] Addressee

B. Received by (Printed Name) C. Date of Delivery
[Signature] 9/2/17

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

3. Service Type
- Adult Signature
 - Adult Signature Restricted Delivery
 - Certified Mail®
 - Certified Mail Restricted Delivery
 - Collect on Delivery
 - Collect on Delivery Restricted Delivery
 - Insured Mail
 - Priority Mail Express®
 - Registered Mail™
 - Registered Mail Restricted Delivery
 - Return Receipt for Merchandise
 - Signature Confirmation™
 - Signature Confirmation Restricted Delivery
- Mail Restricted Delivery (500)

ATTACHMENT 2

PSC Metals, Inc.

Proceeding to Assess a Civil Penalty Under Section 113(d) of the Clean Air Act:
CAA-05-2017-0010; PSC Metals, Inc., Mayfield Heights, Ohio
Paragraph 38 of the Consent Agreement and Final Order, SEP Completion Report

March 9, 2017

Joseph King, Vice President
PSC Metals, Inc.
5875 Landerbrook Drive #200
Suite 200
Mayfield Heights, OH 44124

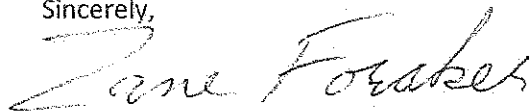
Re: Supplemental Environmental Project "SEP"

Dear Mr. King:

This letter will serve as confirmation that Knox County Public Schools received \$60,000 from PSC Metals Inc. on March 8, 2017. Knox County Public Schools intends to put the money received from PSC Metals, Inc. toward a Building Automation System ("BAS") which is part of an Energy Conservation Project at Farragut Middle School in Knoxville, Tennessee. Knox County Public Schools will be responsible for selecting, purchasing and installing the equipment on the school grounds. A description of the possible materials to be used for the BAS project was included in Attachment A to the Consent Agreement and Final Order (CAA-05-2017-0010) dated February 7, 2017.

Thank you for PSC Metals contribution to this project, which will reduce both greenhouse gas emissions and utility costs for Knox County Schools.

Sincerely,

A handwritten signature in cursive script that reads "Zane Foraker".

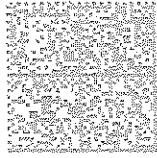
Zane Foraker, P.E., C.E.M.
Energy Manager
Knox County Schools

62716204

ZANE FORAKER
KNOX COUNTY SCHOOLS
MAINTENANCE & OPERATIONS DPT
900 East Fifth Avenue
Knoxville, TN 37917



714 372
155 MAR 17
PM 2 1



02 1P
\$ 000.46
0000276171 MAR 09 2017
MAILED FROM ZIP CODE 37917

WILL HANSARD
PSC Metals, Inc
710 South 1st Street
NASHVILLE, TN 37213

37213-142510

ATTACHMENT 3

PSC Metals, Inc.

Proceeding to Assess a Civil Penalty Under Section 113(d) of the Clean Air Act:
CAA-05-2017-0010; PSC Metals, Inc., Mayfield Heights, Ohio
Paragraph 38 of the Consent Agreement and Final Order, SEP Completion Report



— PSC METALS, INC. —

Via Certified Mail

March 6, 2017

Mr. Zane Foraker
Energy Manager
Knox County Schools
900 East 5th Ave.
Knoxville, Tennessee 37917

RE: Letter Agreement for SEP/Energy Conservation Project at Farragut Middle School

Dear Mr. Foraker,

PSC Metals is pleased to offer the Knox County School system \$60,000 in partial funding for the Building Automation System Project at Farragut Middle School. A description of the BAS Project is included as Attachment A.

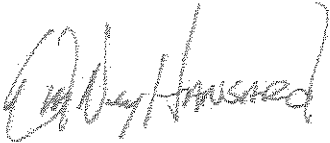
This offer is subject to the terms of the Consent Agreement and Final Order (CAFO-see Attachment B) between the USEPA and PSC Metals. One of the terms of this agreement is that PSC Metals contribute to a Supplemental Environmental Project. The BAS Project is the Supplemental Environmental Project selected for this CAFO.

The CAFO requires the following:

1. That PSC Metals pay \$60,000 in partial funding for the BAS within 30 days of execution of the CAFO (due March 10, 2017)
2. That PSC Metals submit a SEP completion report within 45 days from the effective date of the CAFO (due March 27, 2017)
3. The completion report must contain documentation that payment was made by PSC Metals to the Knox County Public Schools (A receipt and letter of transmittal is requested from you on receipt of the funds.)
4. A statement from the Knox County Public Schools certifying that the money was received and has been put towards the BAS Project or a copy of a signed agreement between PSC Metals and Knox County Public Schools specifying that the funds provided by PSC Metals will be used for the BAS Project.

Accordingly, PSC Metals agrees to pay \$60,000 in settlement of the SEP to Knox County Schools to satisfy paragraph 36 of the CAFO. Knox County Schools 1) agrees to provide documentation that the \$60,000 payment was made to Knox County Schools, and 2) agrees to support the SEP as indicated above and in the attachments, and 3) assures that the funds provided by PSC Metals will be used for the BAS Project. Please sign and date on the appropriate line below.

Mr. Zane Foraker
Knox County School System
March 6, 2017
Page 2 of 2



Signature
William Hansard
Director of Environmental Affairs
PSC Metals, Inc.

March 6, 2017
Date



Signature
Zane Foraker
Energy Manager
Knox County School System

3/8/2017
Date

Cc: Joe King, Vice President and General Counsel, PSC Metals
Doug Cohen, Counsel, Brown Rudnick