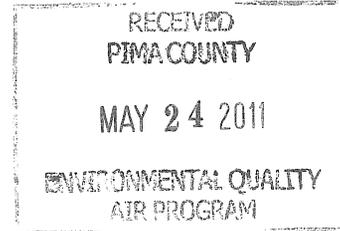




MATERION



May 23, 2011

Richard Grimaldi, Deputy Director
Pima County Department of Environmental Quality
33 N. Stone Ave. Suite 700
Tucson, AZ 85701

RE: Request to Reduce Stack Testing Frequency, Permit #1571

Dear Mr. Grimaldi,

This letter is being submitted as a request to reduce the stack testing frequency from once per year to once per permit cycle. Materion has continued to use current approved technology and leading indicators to ensure the effectiveness of its pollution control devices. During 2011 we purchased an additional particle analyzer and installed it in our stack. We also replaced the existing three (3) particle probes with new probes and purchased a new multi channel monitor that collects the data on a continuous basis from all four (4) probes and stores it electronically. While the proposed technology is not able to detect beryllium specifically, it still provides an additional layer of monitoring capability to our current system.

The new monitoring equipment coupled with our established inspection programs combine to provide a reliable, consistent process for effectively managing our pollution control equipment. These measures will help to ensure permit compliance as well as our environmental protection objectives. We feel that the necessity of performing annual stack testing has little to do with the daily safeguards and monitoring programs and therefore request that the stack testing be performed at one defined point within the permit cycle.

We appreciate your evaluation and consideration of this request.

Please contact me with any comments or questions concerning this matter.

Respectfully,

Richard Manes
EH&S Supervisor

Cc: K. Harrison
R. Napoles