



State of Ohio Environmental Protection Agency

**Southeast District Office**

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Ted Strickland, Governor  
Lee Fisher, Lieutenant Governor  
Chris Korleski, Director

February 24, 2010

**Re: NOBLE COUNTY  
INTERNATIONAL CONVERTER, INC  
FACILITY ID# 0661000027  
HPV-M1B  
Certified: 70073020000178849286**

Mr. Rick Starling  
International Converter, Inc.-Caldwell  
17153 CR 57  
Caldwell, OH 43724

**Subject: Response to NOV**

Dear Mr. Starling:

On December 3, 2009, I received a letter in response to the notice of violation (NOV) I sent to you on October 29, 2009.

**Catalytic Incinerator Parameter Monitoring**

In your response to the NOV, you stated that I incorrectly stated that International Converter, Inc. (Converter) is not monitoring the inlet temperatures of the catalytic incinerator. You then proceeded to explain programming of your alarm system and how your temperatures are monitored. You also explained that Converter monitors the inlet temperature; however, the manufacturer's recommendation is to monitor the average catalyst bed temperature and not just the inlet temperature. It is for this reason you are monitoring both the inlet and the average temperature. Based on strip charts data submitted from the September 24, 2008 stack test, it appears that Converter's required minimum inlet temperature is 688 degrees which indicates that Converter is properly monitoring the inlet temperature as required in the permit. Converter is in compliance with this monitoring requirement. Converter has reported several incidents where the inlet temperature has fallen below 688 degrees which is still a violation of the permit. You have submitted to Ohio EPA an Engineering Study completed by Environ explaining why this temperature is not an accurate way to monitor the efficiency of the incinerator; however, Ohio EPA cannot approve alternative monitoring strategies without supporting data from the manufacturer.

**Use of Coatings with VOC Content in Excess of Permit Limits**

On January 28, 2010, Sarah Harter and I discussed this NOV with Rick Starling and Vasco Roma from Environ via conference call. During our call, you explained how Converter has supplied Ohio EPA with a copy of the standard operating procedures (SOP) and a return to compliance plan, and you assured us that training programs were in place to prevent future

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exceedences of your limits based on improper flagging of coatings. The SOP was formally implemented as of December 31, 2009. It is noted that on February 1, 2010, I received an e-mail from Rick Starling notifying me of another incident where solvent had been mistakenly identified as water-based and was used in Laminator 5. This error occurred in early October 2009 at which time the SOP had not been implemented formally. Because a formal SOP has been implemented since the time of the last deviation, Converter has been returned to compliance on this issue.

As for violations due to exceedances of VOC content when using Titan 210-1213 on Laminator 7, Ohio EPA is not able to return this emissions unit to compliance until a new PTI is issued. It is for this reason that you are required to submit a new PTI application 30 days upon receiving this letter that will adequately reflect Converter's potential to emit.

#### **Excess Emissions from Laminator 7**

As for violations due to exceedances of the hourly limit on Laminator 7, Ohio EPA acknowledges that Converter has not had a deviation in the 11.74 lbs/hr limit since the first quarter of 2009. We have discussed how the 11.74lbs/hr limit is not a true reflection of Converter's current potential to emit and how this limit needs to be increased so that operations at Converter are not hindered. Please include this information in the PTI application requested above.

I appreciate your willingness to discuss these issues. If you have any questions or concerns regarding the content of this letter or any requests made herein, please contact me at 740-380-5228 or at [erika.jackson@epa.state.oh.us](mailto:erika.jackson@epa.state.oh.us).

Sincerely,



Erika Jackson,  
Environmental Specialist II  
Division of Air Pollution Control

EJ/mlm

cc: Bruce Weinberg, SEDO-DAPC  
Jim Orlemann, CO-DAPC  
Lisa Holscher, USEPA Region V