



State of Ohio Environmental Protection Agency

Southeast District Office

2195 Front Street
Logan, Ohio 43138

TELE: (740) 385-8501 FAX: (740) 385-6490
www.epa.state.oh.us

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

October 3, 2008

**RE: Noble County
International Converter, Inc.
0661000027 K010
COMPLIANCE TEST**

CERTIFIED: 70063450000190559758

Mr. Russ Kapperman
International Converter, Inc.
11753 Industrial Highway
Caldwell, Ohio 43724

Dear Mr. Kapperman:

On June 5, 2008, Environmental Source Samplers performed volatile organic compounds emissions and overall control efficiency compliance test at 11753 Industrial Highway, Caldwell on laminator 7 (Emissions Unit K010). Ohio EPA received the test report on July 16, 2008. The test report has been reviewed and we have concluded that the test was conducted according to the procedures specified in 40 CFR Part 60, Appendix A, U.S. EPA Test Method(s) 1-4, 24, 25, 25A, 204 and 204B. The results of the test showed the source to be out of compliance with the applicable Ohio EPA regulations and your facility permit terms and conditions.

Our test review shows the following:

| | | |
|--------------------------|------------------|-----------------------------------|
| Tested Emission Rate: | 15.0 lbs/hr | 69.3% overall control efficiency |
| Allowable Emission Rate: | 11.74 lbs/hr | 90.0 % overall control efficiency |
| Source Operating Rate: | 99,300 sq. Ft/hr | |

Please submit to this office, within 30 days of receipt of this letter, a plan and schedule for achieving compliance. Submit this plan to the attention of Christina Wieg.

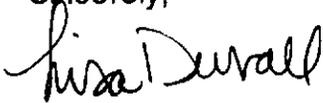
Acceptance by Ohio EPA of a compliance plan and schedule does not constitute a waiver of Ohio EPA's authority to seek civil penalties as provided in Section 3704.06 of the Revised Code. The determination to pursue or to decline to pursue such penalties in this case will be made by Ohio EPA at a later date.

Please refer any questions concerning the above requirements to Christina Wieg, Ohio EPA Southeast District Office, at 740-380-5223.

Mr. Russ Kapperman
International Converter, Inc.
October 3, 2008
Page 2

Thank you for your cooperation in this matter.

Sincerely,

A handwritten signature in cursive script that reads "Lisa Duvall".

Lisa Duvall
Environmental Specialist
Division of Air Pollution Control

LD/mlm

cc: Christina Wieg (Emissions Unit File Copy)
Dean Ponchak, DAPC-SEDO w/ CETA summary attachment
Lisa Holscher, U.S. EPA Region V
Tom Kalman, DAPC-CO
Test Report File Copy

DIVISION OF AIR POLLUTION CONTROL-SEDO

CETA APPENDIX K DATA

Stack Test Review Summary Form

FACILITY INFORMATION

FACILITY NAME: International Converter

Laminator 7

COUNTY: Noble

FACILITY ID: 0661000027 K010

SCC: 4 02 013 01

EMISSION TEST INFORMATION

POLLUTANT(S) TESTED: VOC

INTENT TO TEST (ITT) NOTIFICATION SUBMITTED: May 13, 2008

SCHEDULED TEST DATE FROM ITT: June 5, 2008

TESTING FIRM: Environmental Source Samplers

DATE TEST CONDUCTED: June 5, 2008

DAPC-SEDO TEST OVERSIGHT

NAME OF DAPC-SEDO STAFF WITNESS: none

WERE ALL RUNS WITNESSED?

*IF NO PROVIDE EXPLANATION: no

IS STACK TEST FIELD FORM COMPLETE? no

WERE AUDIT SAMPLES TAKEN? no

EMISSION UNIT INFORMATION

EMISSION UNIT ID#: K010

EMISSION UNIT DESCRIPTION: laminator 7

EMISSION UNIT MONITORING AND CONTROL

LIST EU MONITORING EQUIPMENT: none

LIST EU CONTROL EQUIPMENT: catalytic incinerator

TEST REPORT

TEST REPORT REVIEWER: Lisa Duvall

DATE TEST REPORT RECEIVED AT SEDO: July 16, 2008

POLLUTANT: VOC METHOD: 1-4,24, 25, 25A, 204, 204b,
204E
ALLOWABLE EMISSION RATE (UNITS): 11.74 lbs/hr
75% overall control efficiency
AVERAGE TEST EMISSION RATE(UNITS):15.0 lbs/hr
91.9% overall control efficiency
MAXIMUM PERMITTED OPERATING RATE FOR EU: sq ft/hr
AVERAGE TEST OPERATING RATE FOR THE THREE RUNS: 99,300 sq ft/hr
TEST PASSED NO
DATE TEST RESPONSE LETTER SENT TO FACILITY: October 3, 2008

I HEREBY VERIFY THAT THE INFORMATION CONTAINED WITHIN THE STACK TEST REPORT HAS BEEN REVIEWED AND IT HAS BEEN DETERMINED THAT THE TEST PROCEDURES, ANALYSES, AND CALCULATIONS ARE:

- AN ACCEPTABLE DEMONSTRATION OF CONFORMANCE WITH THE APPROVED TESTING METHODOLOGY**
- AN UNACCEPTABLE DEMONSTRATION OF CONFORMANCE WITH THE APPROVED TESTING METHODOLOGY**

Lisa Duvall

Date of Review

Reviewed by