

International Converter
Noble
Correspondence



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

May 13, 2008

Re: International Converter, LLC
Noble County
Facility ID # 0661000027

Certified Mail: 70041160000169053186

Ken Neyhard
Vice President Operations
International Converter, LLC
600 Thilmany Road
P.O. Box 600
Kaukauna, WI 54130

Subject: failed to submit a complete Title V compliance certification, in violation of the Title V permit terms and conditions and Ohio Administrative Code (OAC) rule 3745-77-07(C)(5).

Dear Mr. Neyhard:

The purpose of this letter is to bring to your attention that International Converter- Caldwell failed to submit a complete compliance certification for the Calendar Year 2007 period in violation of OAC rule 3745-77-07(C)(5), the terms and conditions of your Title V Permit (Part I. A.), and Ohio Revised Code (ORC) Section 3704.05(C). Provided below is a description of the deficiencies with your initial compliance certification submittal:

- The facility submitted a timely 2007 Title V Annual Compliance Certification which indicated intermittence compliance for a number of terms and conditions in the facility's Title V permit. However, the facility failed to provide explanation of the nature, duration, and probable cause of the excursion/deviation, as well as any corrective action taken in the column labeled "other" on the Title V Compliance Certification form. Please see the enclosed example Title V Annual Compliance Certification for additional guidance.
- The facility indicated that emission units K001 through K007 and K009 failed to comply with emission limitations established in Part. III.A.I.1 of the facility's Title V permit. The facility failed to indicate the appropriate methodology that was used to determine compliance with the emission limitations as outline in Title V Permit, Section V. Testing Requirements for the involved emission units. Please see the enclosed example Title V Annual Compliance Certification for additional guidance.

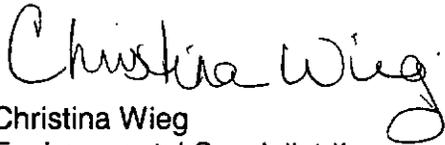
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It is important that your company immediately prepare a revised compliance certification and submit this required compliance certification, as soon as possible, but not later than 30 days from receipt of this letter.

If you fail to submit the revised Title V compliance certification by the deadline, we will have no choice but to refer this matter to Columbus for appropriate enforcement action that could include the assessment of civil penalties.

Should you have any questions regarding this matter, please feel free to contact Christina Wieg at christina.wieg@epa.state.oh.us or (740) 380-5223.

Sincerely,



Christina Wieg
Environmental Specialist II
Division of Air Pollution Control
Southeast District Office Ohio EPA

CW/mlm

Enclosed: Example Title V Annual Compliance Certification

CC: Mark Fuhrman, Plant Manager, International Converter (with enclosure)
Russ Kapperman, EHS Director, International Converter (with enclosure)