

INTERNATIONAL CONVERTER
Correspondence



State of Ohio Environmental Protection Agency

Southeast District Office

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Logan, Ohio 43138

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

July 3, 2007

Re: Noble County
International Converter, Inc. - Caldwell
PREMISE #0661000027
Notice of Violations
Certified Mail #70063450000190546161

Ken Neyhard
International Converter, Inc. - Caldwell
17153 CR 57
Caldwell, OH 43724

Subject: Response to Recent Violations Discovered at International Converter

Dear Mr. Neyhard:

The purpose of this letter is to address current and past violations discovered at International Converter, Inc. located in Caldwell, Ohio.

Failed Stack Test

On August 29, 2006, International Converter, Inc. - Caldwell conducted a stack test of emissions units K001-K010. The test indicated non-compliance with the required overall control efficiency of 75%. The facility submitted a plan and schedule in a letter dated January 25, 2007 to bring K001-K010 back into compliance. The facility retested the emissions units on April 3 and 4, 2007. As indicated in the Ohio EPA letter dated June 25, 2007, emissions units K001-K010 have demonstrated return to compliance with the required control efficiency.

40 CFR Part 63, Subpart KK and 40 CFR Part 63, Subpart JJJJ Requirements

In a letter dated May 22, 2007, International Converter, Inc. indicated that the facility increased the production at Caldwell in 2006. As a result, the facility exceeded the major source threshold based on its emissions of toluene and became subject to 40 CFR Part 63, Subpart KK. In addition, the facility indicated in the letter that they ceased keeping the records required by 40 CFR Part 63, Subpart KK in 2000. The facility submitted a plan to return to compliance on June 6, 2007. It is Ohio EPA's understanding that the facility is working with the United States Environmental Protection Agency, Region V on these issues. If you have additional questions regarding these issues, please contact Sheila Desai, US EPA at (312) 353-4150.

Non-compliance with Minimum Incinerator Temperature Requirements

In the cover letter for the 4th Quarter/2nd Semi-annual Deviation Report and Annual Emission Report, the facility indicated that the incinerator was out of compliance with minimum temperature requirements. The failure to maintain the minimum temperature requirements of the incinerator is a violation of the Title V permit term Part III.A.II.3. Please provide a plan and schedule to address this violation within 15 days of receipt of this letter. The plan and schedule should explain why the violations occurred and include steps the facility is implementing to prevent such violations in the future.

Non-compliance with Required Monitoring Requirements for Incinerator

Per a telephone conversation on June 14, and in the cover letter for the 4th Quarter/2nd Semi-annual Deviation Report and Annual Emission Report, the facility indicates that they currently monitor the average temperature in the incinerator (the average of two thermocouples, one before the catalyst bed and one after the catalyst bed) and the outlet temperature. The failure to record and monitor the temperatures immediately upstream and downstream of the incinerator's catalyst bed is a violation of the Title V Permit Terms Part III.A.III.1 and Part III.A.III.2. Please provide a plan and schedule to address this violation within 15 days of receipt of this letter. The plan and schedule should explain why the violations occurred and include the steps the facility is implementing to prevent such violations in the future.

VOC lb/hr Emission Violation

In the 4th Quarter/2nd Semi-annual Deviation Report and Annual Emission Report, the facility indicated that Emissions Unit K003 exceeded the 75 lbs/hr VOC emission limitation on two occasions. These are violations of OAC rule 3745-31-05(A)(3). Please provide a plan and schedule to address this violation within 15 days of receipt of this letter. The plan and schedule should explain why the violations occurred and include the steps the facility is implementing to prevent such violations in the future.

2006 Title V Compliance Certification

International Converter failed to submit a complete compliance certification for the Calendar Year 2006 period, in violation of OAC rule 3745-77-07(C)(5), the terms and conditions of the Title V Permit (Part IA.), and Ohio Revised Code Section 3704.05(C). Provided below is a description of the deficiencies with your initial compliance certification submittal:

- In the cover letter for the 4th Quarter/2nd Semi-Annual/Annual 2006 Report, the facility indicates that a number of deviations/violations were identified after the submission of the 2006 Title V Compliance Certification. Therefore, the 4th Quarter/2nd Semi-Annual/Annual 2006 Report included these deviations/violations, but they were absent from the Compliance Certification.

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

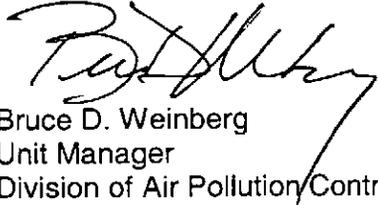
If you fail to submit the revised Title V Compliance Certification by the deadline, we will have no choice but to refer this matter to our Central Office for appropriate enforcement action that could include the assessment of civil penalties.

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

Ken Neyhard
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Should you have any questions, feel free to contact me at (740) 380-5257.

Sincerely,

A handwritten signature in black ink, appearing to read "Bruce D. Weinberg". The signature is fluid and cursive, with a long horizontal stroke at the end.

Bruce D. Weinberg
Unit Manager
Division of Air Pollution Control

BDW/CW/mlm

CC: Christina Wieg, DAPC/SEDO
Sheila Desai, USEPA/Region V
Lisa Holscher, USEPA/Region V
Jim Orlemann, DAPC/CO