



State of Ohio Environmental Protection Agency

Northeast District Office

2110 East Aurora Rd.
Twinsburg, Ohio 44087

TELE: (330) 963-1200 FAX: (330) 487-0769
www.epa.state.oh.us

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

September 23, 2008

RE: ITEN INDUSTRIES, INC., PLANT 1
DAPC FACILITY ID # 02 04 01 0112
RETURNING TO COMPLIANCE
EMISSIONS UNITS K001, K002, K004
AND P003, WHICH ARE CONTROLLED
BY THE THERMAL OXIDIZER.

Mr. Jim Brady
Corporate Engineering Manager
Iten Industries, Inc., Plant 1
P.O. Box 2150
Ashtabula, OH 44005

Dear Mr. Brady:

This letter is to acknowledge that Iten Industries, Inc., Plant 1 ("Iten") has returned to compliance with the applicable VOC limits for overall control efficiencies for emissions units K001, K002, K004 and P003 and the destruction efficiency for the thermal oxidizer.

The Ohio EPA, Northeast District, office issued a notice of violation dated April 18, 2008, for not complying with the aforementioned VOC limits.

Iten had submitted a compliance plan dated April 29, 2008, and retested the emissions units on July 17, 2008. Custom Stack Analysis performed emission testing, and Ohio EPA witnessed the test.

This office has completed a review of the test report and found that emissions units K001, K002 and K004 have achieved an overall control efficiency for VOC above the limit of 81% by weight, and for emissions unit P003, above the limit of 85% by weight.

In addition, the thermal oxidizer had achieved an efficiency for the destruction of VOC emissions above the limit of 90%, by weight, from combined emissions vented from emissions units K001, K002, K004 and P003.

The control efficiency for each emissions unit, based on the average of three one-hour test runs, was 98.68%. The destruction efficiency of the thermal oxidizer, based on three one-hour test runs, was 98.68%.