



Environmental
Protection Agency

John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

Re: Wood County
Luckey Farmers, Inc.
Sugar Ridge Road
Bowling Green, OH 43402
Premise #0387020033
Notice of Violation (NOV/non-HPV)

December 29, 2011

Mr. William Wensink, Risk Coordinator
Luckey Farmers, Inc.
1200 West Main Street
P. O. Box 217
Woodville, Ohio 43469

Dear Mr. Wensink:

This letter shall serve as follow-up to the inspection I conducted at the above-referenced facility on December 16, 2011. The reason for the inspection was to determine if the emission units at Luckey Farmers, Inc. – Sugar Ridge branch (herein referred to as LFI-SR) are operating in compliance with the rules and regulations of the Division of Air Pollution Control (DAPC). The inspection was conducted on behalf of Ohio EPA's DAPC at the Northwest District Office (NWDO).

Based on my observations during the inspection, the information obtained from the facility operator onsite and a review of the facility files at the NWDO, the findings of the inspection are summarized as follows:

1. LFI-SR operates a grain elevator that currently has a storage capacity of about 0.9 million bushels. Emissions units identified at the facility are two (2) grain receiving stations (by truck), a column grain dryer installed a few years ago, and grain loading operations by truck (and possibly by rail). In addition, there are fertilizer receiving, mixing and loading operations that occur onsite.

Records indicate that this facility was installed in 1920. There have been a number of additions to the plant since that time. In 1974, LFI-SR installed a 2,000 bushel per hour Berico grain dryer that was issued a Notice of Registration on December 23, 1977. LFI-SR replaced that dryer with a natural gas-fired Zimmerman grain dryer rated at 3,500 bushels per hour. In addition, a bin was installed in 2007 that has a capacity of 377,000 bushels.

None of the emission units identified above have been permitted as is required by DAPC regulations. Therefore, the installation and operation of these emissions units are in violation of Ohio Administrative Code (OAC) rule 3745-31-02 and Ohio Revised Code (ORC) 3704.05. LFI-SR is required to submit a Permit to Install and Operate (PTIO) application, an Emissions Activity Category (EAC) form and a process flow diagram for each emissions unit. The submittal of this information is required no later than February 2, 2012.

2. Please note that Ohio EPA has an Office of Compliance Assistance and Pollution Prevention (OCAPP) that may be able to assist you in coming into compliance with the rules and regulations of DAPC. Additional information about this office can be found at <http://www.epa.ohio.gov/ocapp> or by calling OCAPP at 1-800-329-7518. The OCAPP representative at NWDO is Mr. Ron Nabors and he can be contacted at (419) 373-3147 or at ron.nabors@epa.state.oh.us.
3. Although this site visit was specific to the Sugar Ridge branch, please note that the violations indicated above are potentially applicable to several other branches that Luckey Farmers, Inc. owns and operates. In order to address this issue fully, current records at NWDO show the following:

Facility ID	Facility address	City	Operating status
0362000142	North Locust & Railroad (SR 19)	Oak Harbor	Permanently Shutdown
0362000144	Graytown Road	Graytown	Permanently Shutdown
0362000145	Water Street	Oak Harbor	Permanently Shutdown
0362000146	Clay Center Road	Curtice	Permanently Shutdown
0372000144	110 Ash Street	Lindsey	Operating
0372000181	Rail Road Street	Woodville	Operating
0387000034	Oak Street	Luckey	Permanently Shutdown
0387000039	Route 582	Dunbridge	Permanently Shutdown
0387020033	Sugar Ridge Road	Bowling Green	Operating
0387040021	23615 Lemoyne Road	Lemoyne	Operating
0387040251	11330 Ave Road	Perrysburg	Permanently Shutdown

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This list does not appear to be correct as a number of facilities indicated as being permanently shut down are still currently operating. Therefore, this list should be updated and corrected accordingly. It is necessary that the facility addresses reflect the physical location of the site. Take for example LFI-SR address of Sugar Ridge Road. This facility is at 11731 Long Street and not on Sugar Ridge Road. The records should include any additional facilities not indicated on the list (e.g., Bradner, Berkey, Genoa and Woodville). Please submit a correction to this list by no later than January 10, 2012.

It is highly recommended that PTIO applications and EAC forms be submitted for each facility since none of the locations indicated above appear to be permitted as required by DAPC regulations. Please be advised that the submission of the requested information to respond to this letter does not constitute waiver of the Ohio EPA's authority to seek civil penalties pursuant to ORC section 3704.06. The Ohio EPA will make a decision on whether to pursue or decline to pursue such penalties regarding this matter at a later date.

If you have any questions and/or concerns regarding this letter, feel free to contact me at (419) 373-3118 or by e-mail at mohammad.smidi@epa.state.oh.us.

Sincerely,



Mohammad Smidi
Environmental Specialist
Division of Air Pollution Control

/l/r

pc: DAPC-NWDO Facility File
Certified Mail Receipt Number 7009 1410 0001 1834 1309

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