



Environmental
Protection Agency

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

Re: Hancock County
Heritage Cooperative
301 West Sumner Street
Arlington, OH 45814
Premise #0332000001
Post-Inspection/Complaint Letter
Notice of Violation (NOV/non-HPV)

November 17, 2011

CERTIFIED MAIL

Mr. Charles Swinehart, Regional Manager
Heritage Cooperative
P. O. Box 170
Arlington, Ohio 45814

Dear Mr. Swinehart:

This letter shall serve as follow-up to the inspection and complaint investigation conducted at Heritage Cooperative ("Heritage") on October 25, 2011. The reason for the inspection was to determine if the emission units at Heritage are operating in compliance with the rules and regulations of the Division of Air Pollution Control (DAPC), as well as to investigate the complaint lodged against the facility on October 18, 2011.

Based on my observations during the inspection, as well as a review of the facility files at the Northwest District Office (NWDO), the findings of the inspection are summarized as follows:

1. The facility was issued a renewal Permit to Install and Operate (PTIO), Permit Number P0108513, on August 16, 2011 for five emission units:
 - a. F001 (1,500 bushels per hour MC column grain dryer);
 - b. F002 (5,000 bushels per hour Zimmerman column grain dryer);
 - c. F003 (Truck receiving operations – 2 dump pits, each controlled by a cyclone);
 - d. F004 (14,00 bushels per hour railcar load-out operations); and
 - e. F005 (5,000 bushels per hour truck load-out operations).

As discussed during the inspection, this renewal PTIO will need to be revised. The dryer throughput limitations appear to be inaccurate and exceed the potential for each dryer. In addition, the PTIO requires the grain receiving operations to use a three-sided enclosure but this requirement is not being met. This same requirement is found in the superseded permit, Permit to Install (PTI) #03-13796 issued on August 15, 2002. This noncompliance issue can be rectified by way of a permit revision. The emissions unit number will need to be changed as well since both grain receiving pits are partially controlled by a cyclone.

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In addition, the emission factor used to establish the emission limitation for the railcar load-out operations is incorrect and will need to be revised. Therefore, Heritage must submit a written letter requesting a modification of this permit to properly reflect the changes indicated above. An updated Emissions Activity Category (EAC) form shall also be included with this letter.

2. The PTIO requires the facility to maintain record of grain throughput from each emissions unit indicated above in tons per month. These records are not being formally kept. A separate spreadsheet that maintains tonnage records of grain dried per month in each dryer, amount of grain received per month and amount loaded out via truck and railcar is necessary.
3. The facility installed and operated a seasonal grain storage pile that requires permitting. The installation and operation of this emissions unit is in violation of Ohio Administrative Code (OAC) rule 3745-31-02 and Ohio Revised Code (ORC) 3704.05. Therefore, the facility is required to submit a PTIO application, an EAC form and a process flow diagram for this emissions unit.
4. The facility roadways were witnessed during the inspection to have been oiled. It was mentioned that dust suppressant was applied to the roadways on October 21, 2011. There were no signs of any dust or dirt at the time of the inspection. For this reason, the justification of the complaint cannot be ascertained at this time.
5. A meeting was held at NWDO on November 10, 2011 to discuss the issues discussed above in detail. Mr. Aaron Schnitkey, Mr. John Smith, and Mr. Max Perry represented Heritage during that meeting.

Heritage is required to submit the information detailed above by December 29, 2011. 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
DAPC-NWDO

/l/r

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