



State of Ohio Environmental Protection Agency

Northwest District Office

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Ted Strickland, Governor
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June 30, 2010

Mr. Don Verhoff, General Manager
Verhoff Alfalfa Mills, Inc.
1188 Sugar Mill Drive
Ottawa, Ohio 45875

Re: Notice of Violation based on inspection of Verhoff Alfalfa Mills (0369000004) on June 16, 2010, with response due by July 27, 2010.

Dear Mr. Verhoff:

This letter shall serve as a follow-up to the inspection conducted on June 16, 2010, of the above referenced facility by Wendy Licht and this writer. The purpose of this inspection was to determine the compliance status of all air contaminant sources located at the facility. Based on observations made by another Division of Air Pollution Control inspector, significant opacity was observed coming from Verhoff Alfalfa Mills' (Verhoff) wood fired alfalfa dryer with cyclone, emission unit P001, on June 7, 2010.

Based on our discussions, my observations during the inspection and a review of the company's files, my findings are as follows:

1. Emission unit P001 was not operating during our site visit so §40 CFR Part 60, Appendix A, Method 9 visible emissions readings were not performed in order to confirm or disprove opacity issues. The emissions unit last operated on June 14, 2010. Please provide an estimated 30-day operating schedule for this emissions unit so that arrangements can be made to return to the facility and observe the process and associated emissions.
2. On December 15, 2009, Verhoff was issued a final renewal permit-to-install and operate (PTIO). This permit (P0087438) supersedes the permit to operate (PTO) that was issued on July 24, 1992.

During the inspection, we requested to see Verhoff's records for daily visible emission checks for P001. We were told that the facility didn't have any recordkeeping requirements in their permit. We proceeded to clarify that P0087438 did indeed have recordkeeping requirements for the unit. Failure to maintain records in accordance with the monitoring and recordkeeping requirements of P0087438 is a violation of OAC rule 3745-31-02 and ORC 3704.05. Verhoff should immediately start maintaining daily visible emission check records for P001, as required in the PTIO.

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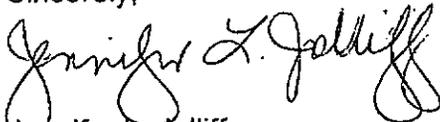
3. At the time of our discussion, it was also stated that, starting back in 1955, Verhoff mills the alfalfa further and pelletizes it. P001 is controlled by two cyclones, while the hammermill and pellet mill cooler are each controlled by a baghouse. Verhoff is in violation of OAC rule 3745-35-02 (recently rescinded), OAC rule 3745-31-02 and ORC 3704.05 for operating the alfalfa pelletizer process without a PTO or a PTIO.

In order to correct this violation, Verhoff is required to submit a completed permit-to-install and operate (PTIO) application and emissions activity category (EAC) forms for process operation and material handling. Electronic PTIO and EAC forms are available on Ohio EPA's website at <http://epa.ohio.gov/dapc/fops/eac/eacforms.aspx>. Please include equipment operating capacity information, emissions calculations, a process flow diagram, baghouse manufacturer operating specifications and equipment installation and/or replacement dates to aid the processing of the application.

Ohio EPA requests a written response to the violations cited, including all requested information for items #1 and #3, by no later than **July 27, 2010**. Please note that the submission of the requested information to respond to this letter does not constitute a waiver of the Ohio EPA's authority to seek civil penalties pursuant to ORC section 3704.06. The Ohio EPA will make the decision on whether to pursue or decline to pursue such penalties regarding this matter at a later date.

I would like to take this opportunity to thank you for speaking with us during our unannounced visit. Should you have any questions or comments concerning this letter, please feel free to contact me at the above referenced address, by email at jennifer.jolliff@epa.state.oh.us or call (419) 373-4112.

Sincerely,



Jennifer L. Jolliff
Division of Air Pollution Control

/l/r

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