



State of Ohio Environmental Protection Agency

Northwest District Office

347 North Dunbridge Road
Bowling Green, Ohio 43402

TELE: (419) 352-8461 FAX: (419) 352-8468
www.epa.state.oh.us

Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Laura H. Powell, Acting Director

Re: Seneca County
Bascom Elevator & Supply Assn
6100 West Poplar Road
Bascom, OH 44809
Premise #0374000183
Warning Letter

January 23, 2007

Mr. Michael Coppus, General Manager
Bascom Elevator & Supply Association
PO Box 305
6100 West Poplar Road
Bascom, Ohio 44809

Dear Mr. Coppus:

This letter shall serve as a follow-up to the inspection conducted of the facility on December 20, 2006 by the Northwest District Office (NWDO) Division of Air Pollution Control (DAPC). The goal of this inspection was to determine the facility's compliance status with DAPC rules and regulations.

Based on my discussions with you, my observations during the inspection, and a review of the company files at NWDO, the findings of the inspection are as follows:

1. The emission units identified at the facility can be summarized as follows:
 - Unpaved/paved roadways and parking areas
 - Grain receiving by truck as well as transferring and conveying operations and screening and cleaning operations
 - Grain loading into trucks
 - Grain loading into railcars
 - 2,500 bushel per hour column grain dryer (installed in 1976)
 - 2,000 bushel per hour column grain dryer (built in 1971)
 - Fertilizer mixing losses
 - Fertilizer receiving by truck(s)
 - Loading of fertilizer into truck(s)
 - Gasoline dispensing facility (GDF)
 - Feed milling plant

The facility has both column dryers on registration status. However, it has been demonstrated based on US EPA's AP-42 emission factors that these emission units require a Permit to Install (PTI) and/or Permit to Operate (PTO). Therefore, the facility is required to submit a PTI application for any of the indicated emission units above if

Mr. Michael Coppus
January 23, 2007
Page Two

installation occurred after 1973. Also, any emission unit considered to be modified after 1973, thereby increasing its emissions, would also be required to submit a PTI application. For emission units indicated above, the company is also required to submit PTO applications.

You indicated during the inspection that Mr. Matthew Langhals is the facility's risk coordinator. I have dealt with Mr. Langhals previously on other facilities and he would be aware of what is necessary for your facility to be in compliance.

2. The facility may be exempt from the permitting requirements regarding the GDF. The facility should review OAC rule 3745-31-03(A)(1)(ee) and (ff) to determine whether the GDF qualifies for a PTI exemption. If the GDF does not qualify for either exemption, a PTI and PTO application would be required.
3. The facility owns a location one block away that contains the fertilizer plant (at 6071 Poplar Street) called Bascom Elevator Fertilizer Plant. The emission units at this physical location (fertilizer mixing losses, fertilizer receiving, fertilizer loading) are considered a part of Bascom Elevator & Supply Association.
4. The facility is required to submit an Emission Activity Category (EAC) form with the applications detailed above for the following:
 - Roadways and Parking Areas (Form 3111)
 - Grain Terminals and Elevators (Form 3120/3121)
 - Fertilizer Mixing/Blending Plants (Form 3127)
 - Gasoline/Diesel/Kerosene Dispensing Facility (Form 3105/3106) All of the information required above is to be submitted by no later than March 9, 2007. If you have any questions, please contact me at (419) 373-3118.

Sincerely,



Mohammad Smidi
Environmental Specialist

/lb

pc: Andrea Odendahl, DAPC/NWDO
Don Waltermeyer, DAPC/NWDO
Samir Araj, DAPC/NWDO

 DAPC/NWDO File