



Environmental  
Protection Agency

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

March 23, 2011

CERTIFIED MAIL

Mr. Greg Chrisman  
Edon Farmer's Co-Op  
205 South Michigan Avenue  
Edon, Ohio 43518

Re: Notice of Violation (NOV/non-HPF) to Edon Farmers Co-op (0386000002) based on complaint investigation and inspection conducted on August 19, 2010, with response due by April 20, 2011.

Dear Mr. Chrisman:

This letter shall serve as a follow-up to the complaint investigation and subsequent inspection of the above-referenced facility conducted on August 19, 2010, by Tom Cikotte and myself. On August 5, 2010, the Ohio Environmental Protection Agency's (Ohio EPA) Northwest District Office (NWDO), Division of Air Pollution Control (DAPC) was forwarded a complaint from US EPA Region V regarding fugitive dust. The complaint stated that fugitive dust generated during the loading of railcars blows over to his business, gets in his shop, covers his client's vehicles and makes it difficult to breathe.

Based on our discussion and my observations during the inspection, my findings are as follows:

1. A review of Ohio EPA's files demonstrates that possible modifications and new installations at the facility have not been accounted for over the years. Currently, the only permit NWDO, DAPC has for Edon Farmers Co-op (Edon) is a registration permit for a grain elevator and feed mill, emissions unit P004, effective November 1, 1985.
2. During the inspection, Edon stated that the total grain storage capacity of the facility is 2.2 million bushels. The following operations are located at the facility:
  - a. Feed Mill (assumed to be part of P004), with the following operations:
    - i. 40 bushel grain receiving pit/truck loading area with enclosure. It should be noted that Edon stated the doors are always open because the area is too small for a semi truck;
    - ii. Eight (8) storage bins and associated auger or belt transfer legs (no pneumatic transfer);
    - iii. One (1) hammermill and one (1) rollermill;
    - iv. Two (2) outside truck loading shoots; and
    - v. Two (2) ear corn receiving pits with a two-sided enclosure.

- b. Westside grain elevator (assumed to be the other operation identified as P004), a seasonal elevator installed in the mid-1970's. This operation consists of:
  - i. One (1) 300 bushel/hour grain receiving pit with no enclosure;
  - ii. Associated transferring and conveying operations;
  - iii. A 2000 bushel/hour natural gas fired grain dryer installed around 1977; and
  - iv. Nine (9) truck loadouts.
  
- c. Eastside grain elevator, installed in the late 1990's. This operation consists of:
  - i. One (1) 700 bushel/hour grain receiving pit offering minimal control of fugitive particulate emissions;
  - ii. One (1) 350 bushel/hour grain receiving pit with a two-sided enclosure;
  - iii. A 3000 bushel/hour, natural gas fired grain dryer installed in 1998;
  - iv. Associated transferring and conveying operations;
  - v. Three (3) truck loadouts; and
  - vi. One (1) 18,000 bushel/hour railcar loadout with telescoping spout. Scalping is also performed here.
  
- d. Paved and unpaved roadways. It was stated during our visit that roadways are treated twice per year with oil and tar.

At this time, Edon is in violation of OAC rule 3745-31-02 [prior to June 30, 2008], OAC rule 3745-35-02 [rescinded June 30, 2008], and ORC 3704.05 for the installation of the Eastside grain elevator operation prior to submitting and receiving a final permit-to-install and subsequent permit-to-operate. It should be noted that permitting for both the Feed Mill and the Westside grain elevator will also need to be revisited because the existing registration permit does not accurately reflect the facility as it currently operates.

- 3. With regards to the complaint that was received, Ohio EPA was unable to determine whether there was a specific event that prompted the initial complaint to US EPA. However, based on our discussion with the complainant and from photos that were provided, Ohio EPA suspects that grain receiving and railcar loading operations at the Eastside grain elevator could generate sufficient fugitive emissions when operating. These fugitive emissions could potentially be in violation of the opacity limitations established under best available technology, based on when the emissions units were installed.

At this time, Ohio EPA requests that Edon provide a compliance plan and schedule for addressing excessive fugitive emissions from grain receiving and railcar loading operations at the facility, in addition to submitting permit-to-install and operate (PTIO) applications, including appropriate emissions activity category (EAC) forms, for the entire facility. These forms are available for download on Ohio EPA's website at: <http://epa.ohio.gov/dapc/fops/eac/eacforms.aspx>. Please be advised that proper installation dates are essential to properly permit these emissions units and therefore we request that the applications include these dates as required. Edon should submit a response to letter, including requested information, no later than **April 20, 2011**.

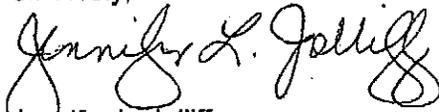
Mr. Greg Chrisman  
March 23, 2011  
Page 3

Ohio's regulations and permit applications can be complex and due to these complexities, Ohio EPA has established an Office of Compliance Assistance and Pollution Prevention (OCAPP) to help small facilities with the permitting process. You can contact OCAPP at (419) 373-3147, or via their website at: <http://www.epa.ohio.gov/Default.aspx?alias=www.epa.ohio.gov/ocapp>. If you feel you will need assistance calculating emission rates and possibly completing the appropriate forms, please let us know. If you choose to contact OCAPP, please notify the NWDO of this fact. The April 20, 2011, deadline for submitting this information may be extended if outside help is required.

Please note that the submission of information to respond to this letter does not constitute a waiver of 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.

Thank you for accommodating our unannounced visit. If the company has any questions and/or comments concerning this letter or the permitting process, please contact Julie Budge at the above address, by calling 419.373.3132, or electronically at [Julie.budge@epa.state.oh.us](mailto:Julie.budge@epa.state.oh.us).

Sincerely,



Jennifer L. Jolliff  
Division of Air Pollution Control

/l/r

pc: Julie Budge, DAPC-NWDO  
Ron Nabors, OCCAP-NWDO  
Tom Kalman, DAPC-CO  
William MacDowell, U.S. EPA Region V  
Michele Regan, U.S. EPA Region V  
DAPC-NWDO File  
Certified Mail Receipt Number 7009 1410 0001 1840 9757

ec: Jennifer Jolliff, NWDO, DAPC