



State of Ohio Environmental Protection Agency

Northwest District Office

347 North Dunbridge Road
Bowling Green, OH 43402-9398

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

Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korleski, Director

Certified Mail

June 4, 2007

Mr. Andrew Bishop
Kalmbach Feeds, Inc.
7148 State Route 199 N
Upper Sandusky, Ohio 43351

Subject: Notice of Violation (NOV-HPF) for Kalmbach Feeds, Inc. (0388010049) based on November 9, 2006 inspection with response due by July 2, 2007.

Dear Mr. Bishop:

This letter shall serve as a follow-up to the inspection conducted on November 9, 2006, of the above referenced facility by Andrea Chapman and this writer. The purpose of this inspection was to determine the compliance status of all air contaminant sources located there.

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

1. During the inspection pressure drop readings from all emissions units were reviewed. It was noted that all of the readings were being within the required pressure drop ranges and were consistently taken on a weekly basis. However, a review of PTI 03-17002 for P010 and P011 requires the company to perform daily readings. Failure to maintain records in accordance with C.1 is a violation of the PTI and ORC 3704.05.

If the company prefers to maintain pressure drop readings for these emission units on weekly basis, then a letter requesting an administrative modification changing this requirement is necessary. Otherwise, Kalmbach Feeds, Inc. needs to do daily pressure drop readings.

2. A review of the agency's file for P010 and P011 shows that Kalmbach Feeds, Inc. has not submitted permit to operate (PTO) applications for these emissions units. Failure to apply for PTOs is a violation of OAC rule 3745-35-02 and ORC 3704.05.
3. PTI 03-13584 was issued on September 20, 2001, for a 12.6 mmBtu/hour, no. 2 oil-fired boiler, emissions unit B001. This permit requires the company to maintain records of annual fuel usage and sulfur content of fuel that is received. In addition, the company is to supply, on a quarterly basis, copies of fuel supplier certifications and annual fuel usage reports.

Mr. Andrew Bishop
June 5, 2007
Page Two

As for reporting, the last report received, including fuel supplier certifications, by Ohio EPA for this emissions unit was for the 4th quarter of 2006. Failure to submit reports is a violation of the reporting requirements outlined in PTI 03-13584 and ORC 3704.05.

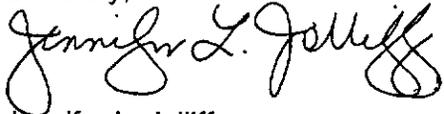
4. During the inspection, there was confusion as to whether emission unit P011, soft stock (east) receiving, permitted in permit to install (PTI) 03-17002, issued November 17, 2005, included the facility's west receiving operation or if the west receiving was even permitted. A review of the original application received on March 24, 1998 for the facility demonstrates that Kalmbach Feeds, Inc. applied for PTIs for both receiving operation separately. The west receiving operation is permitted as F001 in PTI 03-1330, issued November 23, 1999. Unless modifications have occurred, such as an increase in throughput or a change in the way emissions are controlled, no PTI is required for west receiving.
5. It was observed during the inspection that the facility maintains a 55 KW electrical generator for emergency purposes. On May 7, 2007, Ohio EPA received a permit-by-rule request for this generator. The request was processed on May 15, 2007 with the emissions unit being identified as P012.

PTO applications for P010 and P011 and a complete 1st quarter 2007 report for B001 need to be submitted no later than **July 2, 2007**. The company can also address how it plans to address the pressure drop monitoring of P010 and P011 at that time. Please note 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.

All other emissions sources appear to be in compliance with air pollution control regulations of the Ohio EPA at this time.

I would like to thank you and Stan White for escorting us around the facility. Should you have any questions or comments concerning this letter, please feel free to contact me at (419) 373-4112.

Sincerely,



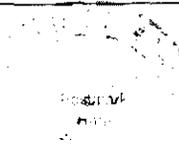
Jennifer L. Jolliff
Division of Air Pollution Control
/lb

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