



State of Ohio Environmental Protection Agency

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**CERTIFIED MAIL # 91 7108 2133 3932 4450 2571**

September 11, 2008

Mr. Harry Newton  
Plant Manager  
Sanimax, Inc.  
599 Frank Road  
Columbus, OH 43223

**Re: ID# 0125040083; Follow-up to October 10, 2007 Notice of Violation**

Dear Mr. Plante:

On October 10, 2007, Ohio EPA, Division of Air Pollution Control, Central District Office (CDO), sent Sanimax a Notice of Violation (NOV) concerning some previous complaint investigations and updating operations with some permitting actions. On January 31, 2008, Ohio EPA, CDO received a response to the NOV. This letter outlines some remaining issues that Sanimax needs to address.

### General

In recognition of the changes to the facility made by Sanimax (such as ducts, new oxidizing wet scrubber, fuel changes in boilers, instrumentation, etc.) and in recognition of the need for permits-to-install-and-operate (PTIOs) to be issued, CDO requests that Sanimax submit updated permit-to-install-and-operate applications, and/or emissions activity category forms, reflecting current operating conditions for:

- the Raw Material Handling building (P002; receiving, conveying and grinding),
- the Rendering Line, including the process building (P003; cooker, cooking room and wastewater treatment room),
- meal grinding and screening,
- grease processing, and
- roadways and parking areas.

In April 2008, CDO received notice from Sanimax that B006 had been permanently shut down. Please note that, starting June 30, 2008, the Division's permit program has evolved to permits-to-install-and-operate, which involves new application forms. Please submit complete applications on current application PTIO forms or utilize DAPC's Air Services software. For more information, see <http://www.epa.state.oh.us/dapc/airservices>.

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

CDO has visited the site several times since the October 10, 2007 NOV, including site visits on July 23, 2008, and September 3, 2008. Equipment and organizational changes continue to be made at the facility. See Findings below.

**Finding One - Improperly Permitted Air Contaminant Source (Wickes Boiler)**

In October 2007, a permit-by-rule was issued for the new Wickes boiler, B007. CDO is aware that this new gas-fired boiler is being used as an air pollution control device for the facility's cooker. This function was served by B006 (English), until Sanimax shut down B006 in October 2007. During an inspection of the facility by CDO, the connection between the cooker exhaust and the new boiler, B007, was noted. Because of this connection, the new boiler no longer qualifies for a permit-by-rule under OAC 3745-31-03(A)(4)(j)(i)(c):

*(c) The emissions from the air contaminant source consist entirely of the products of fuel combustion.*

**Resolution Action**

Sanimax should submit an application for a permit-to-install-and-operate (PTIO) for its new Wickes boiler, B007, functioning both as a steam generator for the facility and as an air pollution control device for the cooker.

**Finding Two - Unpermitted Air Contaminant Source (York Boiler)**

CDO is aware that the new gas-fired boiler (York, B007) is also being used as an air pollution control device for the facility's cooker. This boiler was installed in February 2008. During an inspection of the facility by CDO, the connection between the cooker exhaust and the new boiler, B007, was noted. Because of this connection, the new boiler does not qualify for a permit-by-rule under OAC 3745-31-03(A)(4)(j)(i)(c):

*(c) The emissions from the air contaminant source consist entirely of the products of fuel combustion.*

This boiler is currently installed and operating prior to obtaining a PTIO, in violation of Ohio Administrative Code 3745-31-02(A)(1)(b):

*(1) Except as provided in rule 3745-31-03 of the Administrative Code, no person shall cause, permit, or allow the:*

*"(b) Installation or modification, and subsequent operation of any new source ..., without first obtaining a PTIO from the director;"*

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### Resolution Action

Sanimax should submit an application for a PTIO for its new York boiler, functioning both as a steam generator for the facility and as an air pollution control device for the cooker.

The February 2000 Consent Order (in paragraph 8) for this facility required an Odor Review and Abatement Study, which was submitted in April 2000. Numerous changes to the facility have been made by Sanimax in the past two years, some of which may have made portions of that study currently outdated/inaccurate. CDO requests that, accompanying the applications above, Sanimax submit a revised Odor Control Operations and Maintenance (OCOM) Plan for the facility's emission control systems and scrubbers.

Please submit these permit applications, and the OCOM plan **within thirty (30) days** of receiving this letter.

Please note that Ohio EPA has the authority to seek civil penalties as provided in section 3704.06 of the ORC. This letter or information submitted pursuant to this letter does not constitute a waiver of Ohio EPA's authority to seek civil penalties as provided in the ORC. The decision on whether or not to seek such penalties will be made by Ohio EPA at a later date.

If you have any questions concerning the issues addressed in this letter, you may contact Richard Lindstrom of my staff at (614) 728-3778.

Sincerely,



Mike Riggleman  
Air Permits and Compliance Supervisor  
Division of Air Pollution Control  
Central District Office

c: Jean-Luc Plante, Sanimax, Inc. Canada  
Steve Herman, Corporate Environmental Manager, Sanimax AMX, LLC  
John Paulian, DAPC/CO  
Adam Ward, DAPC/CDO