

**Environmental
Protection Agency**

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

September 14, 2011

Re: Muskingum County
Ballas Egg Products
Facility ID # 0660010010
Air Compliance Inspection
Non HPV Warning Letter

Craig Ballas
Ballas Egg Products
40 North Second St.
Zanesville, OH 43701

Dear Mr. Ballas:

On August 24, 2011, I performed an inspection of the Ballas Egg Products' facility in Zanesville, Ohio (Muskingum County). The required inspection was conducted to determine the facility's compliance with State and federal air pollution rules and regulations prior to issuing the pending permit to install and operate (PTIO).

According to PTI 06-3249, and your effective permit to operate:

"Emissions of particulate matter shall not exceed 0.030 grain per dry standard cubic foot of exhaust gases or there shall be no visible particulate emissions, whichever is less stringent. Particulate emissions shall not exceed 0.8 pounds per hour.

The permittee shall perform daily checks for any visible particulate emissions from the exhaust of the fabric filter control system. The presence or absence of any visible emissions from the exhaust of the fabric filter control system shall be noted in an operations log. If any visible emissions are observed, corrective actions shall be taken to eliminate the visible emissions and these actions shall also be noted in the operations log."

During the inspection, I did observe intermittent visible emissions from the fabric filter egress. Please evaluate the cause of the visible emissions and determine what corrective action(s) need to be taken. You also indicated that you have not been conducting daily visible emissions checks, but instead have been relying on pressure drop readings from a magnahelic on the fabric filter to ensure that the fabric filter is operating properly. We discussed the possibility of changing your permit requirements to align with your current monitoring activities. Until an agreed upon change is made to the monitoring provisions of the PTIO, please conduct the daily visible emission checks to insure that the fabric filter is operating properly.

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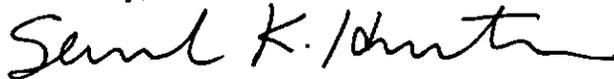
Please note that having visible emissions without an emissions test to show that the applicable emission limitations have not been exceeded; and not conducting the daily visible emissions checks are violations of the requirements in the PTI and permit to operate.

Within 30 days of receipt of this letter, Ballas Egg Products shall submit a compliance plan and schedule to return the facility to compliance. The plan should include a time line for completing corrective actions and specify the corrective actions taken.

Acceptance by Ohio EPA of a schedule for compliance does not constitute a waiver of Ohio EPA's authority to seek civil penalties as provided in section 3704.06 of the Ohio Revised Code. The determination to pursue or decline to pursue such penalties in this case will be made by Ohio EPA at a later date.

If you are unable to respond to any part of this request within the time frame discussed above, please inform us and explain so that we may be of assistance. Should you have any questions, feel free to contact me at (740) 380-5249 or email at sarah.harter@epa.state.oh.us

Sincerely,



Sarah Harter
Environmental Supervisor
Division of Air Pollution Control
Southeast District Office

SH/SJP/mlm

cc: Bruce Weinberg, DAPC-SEDO