



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

Re: Henry County
Grelton Elevator, Inc.
6944 County Road M
Grelton, Ohio 43523
Premise #0335000161
Notice of Violation (NOV/non-HPV)

August 27, 2013

Mr. Darwin Beck, Owner
Grelton Elevator, Inc.
P.O. Box 276
Ridgeville Corners, Ohio 43555

Dear Mr. Beck:

This letter shall serve as a follow-up to the inspection conducted at the above-referenced facility on August 20, 2013 by the Northwest District Office (NWDO) Division of Air Pollution Control (DAPC). The goal of this inspection was to determine the Grelton Elevator, Inc. (herein referred to as GEI) compliance status with DAPC rules and regulations.

Based on my discussions with Mr. Eric Norden, my observations during the inspection, and a review of the GEI files at NWDO, the findings of the inspection are as follows:

1. The emission units identified at the GEI facility can be summarized as follows:
 - Unpaved roadways and parking areas
 - Paved roadways and parking areas
 - Grain receiving by truck as well as transferring and conveying operations
 - Grain loading into trucks
 - 2,000 bushel per hour column grain dryer (installed in 1995)
 - 2,500 bushel per hour column grain dryer (built in 2008)
 - Dry fertilizer receiving, mixing and loading operations
 - Liquid fertilizer operations

It has been demonstrated based on US EPA's AP-42 emission factors that the emission units identified above require a Permit-to-Install and Operate (PTIO) pursuant to Ohio Administrative Code (OAC) rule 3745-31-02. The GEI facility has installed and operated these emission units prior to applying for, and being issued, a PTIO. Therefore, GEI is in violation of OAC rule 3745-31-02 and Ohio Revised Code (ORC) §3704.05. In order to resolve these violations, it is imperative that GEI submit PTIO applications for each of the identified emission units above that also includes corresponding Emissions Activity Category (EAC) forms and process flow diagrams. This information is required by no later than September 24, 2013.

GEI can submit the required information detailed above by filling out applications and EAC forms (along with process flow diagrams) which can be downloaded directly from Ohio EPA's website at <http://epa.ohio.gov/dapc/fops/eac/eacforms.aspx>.

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2. Although this may be the first correspondence sent recently to GEI regarding a violation status, Ridgeville Elevator in Fayette (Premise number 0326002015) received a similar type of NOV letter dated October 16, 2012. That letter was addressed to you as the owner of that facility. You are the sole incorporator at GEI and are therefore being sent this NOV letter. Please be aware that the facility located in Ridgeville Corners (Ridgeville Elevator, Inc. that has a premise number 0335000162) also is void of any permits and is considered in the same status as GEI. It is necessary that information (including full permit applications) be submitted for that location as well.

As stated to Mr. Norden during the inspection, Ohio EPA has an Office of Compliance Assistance and Pollution Prevention (OCAPP) which is available to assist qualifying small businesses in achieving and maintaining compliance with Ohio's environmental regulatory programs. OCAPP will be able to help you with the permit requirement determination and the permitting process. More information pertaining to OCAPP is also available on our website at <http://www.epa.state.oh.us/ocapp/ocapp.html>. Should you choose to contact OCAPP for assistance with issues pertaining to this letter, please contact Mr. Ron Nabors at (419) 373-3147 or by e-mailing ron.nabors@epa.ohio.gov.

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 §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.

If you have any questions or comments regarding this letter, please contact me at (419) 373-3118 or you may do so electronically to mohammad.smidi@epa.ohio.gov.

Sincerely,



Mohammad Smidi
Environmental Specialist

/cg

cc: Brian Dickens, US EPA Region V
Bruce Weinberg, DAPC-CO
Jennifer Jolliff, DAPC-NWDO
Mark Budge, DAPC-NWDO
Mohammad Smidi, DAPC-NWDO
Thomas Cikotte, DAPC-NWDO
Tom Norden