



**Environmental
Protection Agency**

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

Re: Van Wert County
Scott Equity Exchange Co.
305 Bonnewitz Avenue
Van Wert, OH 45891
Premise #0381020013
Notice of Violation (NOV/non-HPV)

December 16, 2011

CERTIFIED MAIL

Mr. Tom Bowers, Branch Manager
Scott Equity Exchange Company
P. O. Box 505
Van Wert, Ohio 45891

Mr. Bowers:

This letter shall serve as follow-up to the inspection conducted at Scott Equity Exchange Company (herein referred to as "Scott Equity") on December 5, 2011. The reason for the inspection was to determine the compliance status of the emission units that are operating at Scott Equity with the rules and regulations of the Division of Air Pollution Control (DAPC). The inspection was conducted by Ms. Carol Norman and me, both representatives of Ohio EPA's DAPC at the Northwest District Office (NWDO).

Based on our discussions with you as well as a review of the Scott Equity files at NWDO, the findings of the inspection are summarized as follows:

1. Scott Equity was issued a Permit to Install (PTI) Number 03-13032 on February 18, 1999, for the following emission units:
 - a. F001 (grain receiving, transferring/conveying and screening/cleaning operations);
 - b. F002 (10,000 bushel/hr railcar load-out operations);
 - c. F003 (2,000 bushel/hr column grain dryer);
 - d. F004 (2,500 bushel/hr column grain dryer).

It appears that truck load-out operations are currently unpermitted. The installation and operation of this emissions unit is in violation of Ohio Administrative Code (OAC) rule 3745-31-02 and Ohio Revised Code (ORC) 3704.05. Therefore, the facility is required to submit a Permit to Install and Operate (PTIO) application for this emissions unit, an Emissions Activity Category (EAC) form and a process flow diagram. Scott Equity is also required to submit PTIO applications, forms and diagrams for the emission units permitted under PTI #03-13032.

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Permit applications and EAC forms can be downloaded from Ohio EPA's website by going to <http://www.epa.ohio.gov/dapc/fops/eac/eacforms.aspx>. If assistance is needed in filling out these forms, please contact me. For convenience, a blank PTIO application and instruction page with an EAC form will be included with this letter.

2. Scott Equity is in violation of the reporting requirements detailed in PTI #03-13032 for not having submitted annual reports since 2008. These reports must be submitted.

Scott is required to submit the information detailed above by no later than January 19, 2012. Please be advised 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. The Ohio EPA will make a decision on whether to pursue or decline to pursue such penalties regarding this matter at a later date.

If you have any questions and/or concerns regarding this letter, feel free to contact me at (419) 373-3118 or by e-mail at mohammad.smidi@epa.state.oh.us.

Respectfully,



Mohammad Smidi
Environmental Specialist
Division of Air Pollution Control

/llr

Enclosure

pc: DAPC-NWDO Facility File

ec: Carol Norman, DAPC-NWDO
Jennifer Jolliff, DAPC-NWDO
Tom Kalman, DAPC-CO
William MacDowell, US EPA Region V