



## REGIONAL AIR POLLUTION CONTROL AGENCY

Serving Clark, Darke, Greene, Miami, Montgomery & Preble Counties  
117 South Main Street, Dayton, Ohio 45422-3280  
(937) 225-4435 – Fax: (937) 225-3486

[www.rapca.org](http://www.rapca.org)

March 8, 2012

Tim Steward, Plant Manager  
Yoder Industries, Inc.  
2520 Needmore Road  
Dayton, Ohio 45414

Re: Ohio EPA Facility ID 0857731276  
Exceedance of PTIO P0107204 5% VE Opacity limit

### **WARNING LETTER**

Dear Mr. Stewart;

On February 27, 2012, the Regional Air Pollution Control Agency (RAPCA) received a complaint of black smoke coming from a smoke stack at this facility on Sunday afternoon, February 26, 2012. On February 28, 2012, a representative of RAPCA performed a complaint investigation, and conducted visible emissions observations (VEOs) using U.S. EPA Reference Method 9 on the tall white/gray round stack located at the southeast side of the building. The VEOs performed on the stack documented a violation of the visible particulate emissions limit established in Final Air Pollution Permit-to-Install and Operate (PTIO P0107204) pursuant to Ohio Administrative Code (OAC) rule 3745-31-05(A)(3).

Specifically, Emissions Unit Terms and Conditions 1.(b)(1)a. states, “visible particulate emissions from any stack shall not exceed 5 percent opacity as a six-minute average”. The VEOs performed by RAPCA on February 28, 2012 resulted in the documentation of two non-overlapping exceedances of the 5% opacity limitation, as a six-minute average. The VEO readings were 12.7 and 13.8 % opacity, as a six-minute average. This exceedance is in violation of the PTIO and Ohio Revised Code (ORC) 3704.05.

During the investigation, the Production Manager stated that he believes the visible emissions problem may be caused by improper combustion and that they have plans to repair the burner assembly on Sunday, March 4, 2012. RAPCA acknowledges this timely effort to repair the burner assembly as your plan to bring the emission unit into compliance with the visible particulate emission limit.

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Within 7 days receipt of this letter, please respond to RAPCA with the date upon which repairs were performed and the extent of the repairs made. If you have any questions concerning this matter, please contact Jefferis R. Canan at (937) 225-5934.

Sincerely,

A handwritten signature in black ink, appearing to read "Jefferis R. Canan". The signature is fluid and cursive, with a long horizontal stroke at the end.

Jefferis R. Canan  
Enforcement Group Supervisor

Cc: Dean Wade, RAPCA  
Tom Kalman, Ohio EPA  
William MacDowell, U.S. EPA