



**Environmental
Protection Agency**

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

Re: Wyandot County
Kalmbach Feed, Inc.
Premise #0388010049
Notice of Violation (Non-HPV)

April 3, 2011

Mr. Andrew Bishop, Vice President of Operations
Kalmbach Feeds, Inc.
7148 State Highway 199
Upper Sandusky, Ohio 43351

Dear Mr. Bishop:

The Ohio EPA has reviewed the information submitted on January 6, 2012, for the grain dryer, emissions unit P009, in response to the agency's December 15, 2011, inspection letter/Notice of Violation. The Ohio EPA has determined that the stack test conducted on October 14, 2011, could not be accepted because the cold end cyclone was not included as part of the test.

The agency has reviewed the permit applications that were submitted for the grain dryer and they do not document the existence of a separate "cold end" for the dryer, vent and cyclone. Upon review of the information submitted on January 6, 2012, the agency has determined that the "cold end" for the dryer, and cyclone are part of the dryer emissions unit and must be included in compliance testing. In addition, the assumed 100% capture efficiency that was applied to the dryer in emission calculations for previous permits must be reevaluated.

Kalmbach Feed, Inc. is in violation of Permit to Install and Operate (PTIO) P0107590, issued April 19, 2011, Section C.1.f)(1.) since testing of P009 was performed within 6 months after permit issuance but was invalidated and therefore did not demonstrate compliance with the established emissions limitations. The company should submit an Intent to Test notification for the dryer, including the "cold end", by May 2, 2012. Additionally, a revised PTIO application that quantifies all emissions from the dryer is required within 14 days of the stack test submittal.

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 section 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.

Mr. Andrew Bishop, Vice President of Operations
April 3, 2012
Page 2

Should you have any questions or comments concerning this letter, please feel free to contact me at the above referenced address or call (419) 373-3106.

Sincerely,



Debbie Ko
Division of Air Pollution Control

/llr

pc: DAPC-NWDO File

ec: Debbie Ko, NWDO, DAPC
Tom Sattler, NWDO, DAPC
Tom Kalman, CO, DAPC
Jennifer Jolliff, NWDO, DAPC
William MacDowell, US EPA, Region 5