



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

Re: Hardin County  
Heritage Cooperative, Ada Facility  
Premise # 0333000153  
**Resolution of Violation**

January 8, 2013

Mr. Max Perry  
Safety and Compliance  
Heritage Cooperative  
304 Bloomfield Avenue  
Urbana, Ohio 43078

Mr. Larry Kaiser  
Manager Ada Grain Branch  
Heritage Cooperative  
332 West Lincoln Street  
Ada, Ohio 45810

Dear Mr. Perry and Mr. Kaiser:

This letter shall serve as a follow-up to the Notice of Violation (NOV) letter dated December 10, 2012, for the above-referenced facility. The purpose of this letter is to indicate the facility's return to compliance status. This was accomplished by the following:

1. On November 30, 2012, Heritage Cooperative ("Heritage") supplied Division of Air Pollution Control (DAPC) with the year to date total of the facility's throughput for emission units having operational restrictions. Throughput totals did not exceed operational restrictions established in P0107346 issued April 2, 2011 and Heritage has developed a spreadsheet to record monthly throughput totals for the facility.
2. Heritage has resumed use of mineral oil to control fugitive emissions from F004 (Truck Unloading, Grain Transfer, Screening and Cleaning) and F005 (Truck and Railcar Loading) as established in P0107346.
3. Heritage has developed a daily weather log and a monthly calendar which will be used to record daily visible emissions (VE) observations and any control measures that need to be implemented as a result of the daily VE observations. These record keeping devices satisfy the monitoring and record keeping requirements established for F001 (Paved and Unpaved Roadways and Parking Areas), F004, and F005 in P0107346.

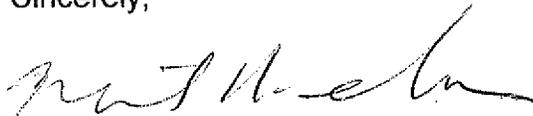
Mr. Max Perry  
Mr. Larry Kaiser  
January 8, 2013  
Page 2

- a. Upon the review of the daily weather log and monthly calendar developed by Heritage, DAPC recommends the following:
  - i. Expand the monthly calendar to include marking any days control measures were taken to eliminate visible emissions for all emission units (not just roadways); and
  - ii. Include each separate emission unit on the daily weather log which has a daily VE requirement so that daily observations are made individually and identified for each separate emission unit.

Please note that this does not preclude the Director from seeking civil penalties pursuant to ORC section 3704.06 for the violations noted in the NOV letter. The decisions on whether to pursue or decline to pursue such penalties regarding this are dependent on several factors, one of which is the company's future compliance with applicable Ohio EPA requirements.

Should you have any questions and/or comments concerning this letter, please feel free to contact me at (419) 373-3069 or electronically at [Miranda.Garlock@epa.ohio.gov](mailto:Miranda.Garlock@epa.ohio.gov).

Sincerely,



Miranda R. Garlock  
Division of Air Pollution Control

/cg

ec: Miranda Garlock, NWDO, DAPC  
Alyse Johnson, NWDO, DAPC  
Julie McCarthy, NWDO, DAPC  
Jennifer Jolliff, NWDO, DAPC  
Mark Budge, NWDO, DAPC  
Bruce Weinberg, CO, DAPC  
Bruce Dickens, U.S. EPA Region V