



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

April 10, 2013

Certified Mail

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

RE: Notice of Violation (NOV/non-HPV) to Kalmbach Feeds, Inc. (0388010049) for failure to maintain ongoing compliance with issued Permits to Install/Operate (PTIOs)

Dear Mr. Bishop:

On February 5, 2013, Ohio EPA received Kalmbach Feeds annual Permit Evaluation Report (PER) for calendar year 2012. Numerous violations of Kalmbach Feeds PTIOs were reported in the PER. The violations are as follows:

1. Reports were submitted after their respective due dates:

Source Number/PTIO#	Report Type	Due Date	Date Submitted
B001/P0107588	Fuel Supplier Certification	1/30/12	3/06/2012
B001/P0107588 P004/P0087988 P005/P0107589 P006/P0087988 P007/P0087988	Annual Permit Exceedance Report	1/31/2012	3/06/2012
B001/P0107588 F001/P0087988 F002/P0087988 P001/P0109006 P002/P0087988 P003/P0087988 P004/P0087988 P005/P0107589 P006/P0087988 P007/P0087988 P008/P0112608 (Formerly PTIO P0087988) P009/P0107590 P010/P0109950 P011/P0109950	PER	2/15/2012	3/06/2012
Facility Wide	Synthetic Minor Fee Emission Report	4/15/2012	4/16/2012

2. Pressure Drop Readings Were Not Recorded: Sources F001 (P0087988), P001 (P0109006), P002 (P0087988), P003 (P0087988), P004 (P0087988), P005 (P0107589), P007 (P0087988), P009 (P0107590), and P010 (P0109950) pressure drop readings were not monitored from January 1, 2012 through March 4, 2012. The responsibilities have since been assigned to another person.

3. Pressure Drop Readings Outside Allowable Range:

Source Number/PTIO#	Dates Outside Range	Time outside range	Reason Outside Range
F001/P0087988	3/5/12 through 3/19/12 4/5/12 through 4/9/12 6/7/12 through 6/8/12 7/3/12 through 7/11/12 7/23/12 through Unknown ⁴ Week of 8/12/12 ⁴ Week of 9/9/12 ⁴ Week of 9/23/12 ⁴ 10/19/12 through 11/5/12 11/19/12 through 11/26/12	7 days 4 days 1 day 8 days Operating Normally ⁴ Not reported ⁴ Not reported ⁴ Not reported ⁴ 17 days 14 days	Bags Dirty Bags Dirty Bags Dirty Bags dirty Product Dense Not reported Not reported Not reported Plugged Bags Bags Dirty
P001/P0109006	3/5/12 through 3/12/12	7 days	Bags Dirty
P002/P0087988	3/5/12 through 4/2/12 4/11/12 through 4/25/12 5/7/12 through 5/21/12 5/28/12 through 6/7/12 6/12/12 7/31/2012 through 8/13/12 10/31/12 through 11/9/12 11/26/12 through 12/14/12	28 days 14 days 14 days 10 days 1 day 14 days 10 days 18 days	Bags Dirty Bags Dirty Bags Dirty Bags Dirty Bags Dirty Filter Damaged Bags Dirty Bags Dirty
P003/P0087988	3/5/12 through 4/2/12 4/11/12 through 4/25/12 5/7/12 through 5/21/12 5/28/12 through 6/7/12 6/12/12 7/31/2012 through 8/13/12 10/31/12 through 11/9/12 11/26/12 through 12/14/12	28 days 14 days 14 days 10 days 1 day 14 days 10 days 18 days	Bags Dirty Bags Dirty Bags Dirty Bags Dirty Bags Dirty Filter Damaged Bags Dirty Bags Dirty
P004/P0087988	4/5/12 through 4/9/12 4/26/12 through Unknown ¹	4 days 1 day ¹	Hole in Cyclone Reading Incorrect
P009/P0107590	4/26/12 through unknown ¹	Unknown ¹	
P010/P0109950	7/31/12 through 10/1/12	61 days	Bags needed replacement

¹Company did not specify the date that the meter was repaired. Ohio EPA requests that when monitoring equipment malfunctions, the facility state when it was repaired in the report.

²Identifying a permit issue does not resolve the permit violation. The company should have identified the specific dates the unit's control equipment operated outside its allowed range and contacted the Ohio EPA to resolve the issue through an administrative modification to the permit.

³The company needs to be more specific than "fluke". Ohio EPA requests that reports specifically identify whether this was a monitoring equipment, control equipment or source problem. The company also needs to specify when the issue was resolved. It should be noted that malfunctions of control equipment that cause emissions to be emitted in violation of any applicable laws are reported to Ohio EPA in accordance with OAC rule 3745-15-06

⁴Equipment operated outside of allowable range. The company must report dates, times and reason(s) that equipment was operated outside of allowable range and address the issue(s) that caused the excursion.

Failure to meet the monitoring, recordkeeping and reporting requirements of the permits identified above is also a violation of ORC 3704.05.

The company should provide the information in comments 1,3 and 4 above if it is available. If the information is not available state that. In addition, Kalmbach Feeds should provide the following additional information:

1. The PER cover letter states that no pressure drop readings were recorded for emissions unit P008 until July 31, 2012 because the baghouse unit was out of service until the week of July 29, 2012. You stated that the original unit was disconnected at the direction of an OSHA inspector who determined that it was an explosion hazard. Provide the Ohio EPA with the date the inspector requested that the baghouse be taken out of service and state whether the North Bagger was operated without the baghouse.
2. State the reason(s) for the delay to request the administrative modification for the PTIO for P008.

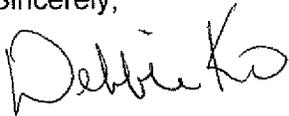
The company should also provide a written response to this letter by May 8, 2013. It should be submitted to Ohio EPA, Northwest District Office and contain a comprehensive malfunction abatement and maintenance plan to remedy the observed situations and prevent these, or any similar such situations, from occurring in the future.

Please note 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 as provided in Section 3704.06 of the Ohio Revised Code. Ohio EPA will determine later whether to pursue such penalties in this case.

Mr. Andrew Bishop
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If the company has any questions and/or comments concerning this letter, please contact me at the above address, by calling (419) 373-4112, or electronically via e-mail at debbie.ko@epa.state.oh.us.

Sincerely,



Debbie Ko
Division of Air Pollution Control

/cg

Enclosure

pc: Certified Mail Receipt Number 7011350000082042197

ec: Walter Ariss, NWDO, DSW
Debbie Ko, NWDO, DAPC
Mark Budge, NWDO, DAPC
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Brian Dickens, US EPA, Region 5