UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

SEP 2 3 2009

REPLY TO THE ATTENTION OF:
(AR-18J)

Michael E. Hopkins, P.E.
Assistant Chief, Permitting
Ohio Environmental Protection Agency
Division of Air Pollution Control
P.O. Box 1049
Columbus, Ohio 43216-1049

Dear Mr. Hopkins:

This letter concerns Hi-Q Egg Products, LLC's (Hi-Q) proposal to construct an egg-laying facility in West Mansfield, Union County, Ohio. The Ohio Department of Agriculture has issued a draft Permit to Install and Permit to Operate for Hi-Q to address manure storage and management, vermin control, bird mortality management, and emergency response. These draft permits do not address Clean Air Act (CAA) requirements. According to the draft permits, the proposed facility will include 15 layer barns designed to accommodate six million birds.

Based on our experience with a similarly sized egg laying facility in Ohio, Buckeye Egg Farm, and data obtained through actual measurements of particulate emissions from Buckeye Egg Farm, Hi-Q's proposed facility would appear to be a major source of particulate emissions. As a major source, Hi-Q would need to go through the appropriate permitting processes under Ohio's State Implementation Plan (SIP) and federally approved Title V program. A detailed CAA preconstruction permit application would facilitate this effort.

Given Hi-Q's intent to begin construction, it would seem prudent to begin the permitting process immediately. Initiating the permitting process prior to any construction could help Hi-Q avoid costly future retrofitting.

Please note that this letter does not represent how you must interpret the permitting requirements that U.S. Environmental Protection Agency has approved into Ohio's SIP or its Title V program, nor does it represent final agency action. This letter is, however, intended to provide guidance to you to consider in your role as the Prevention of Significant Deterioration and Title V permitting authority.

As you may be aware, EPA is currently overseeing the collection of emissions information from various types of concentrated animal feeding operations (CAFOs) under its National Air Emissions Monitoring Study.

Recycled/Recyclable • Printed with Vegetable Oil Based Inks on 100% Recycled Paper (50% Postconsumer)

While the results of this study will help to inform future environmental permitting throughout the CAFO sector, we do not expect the results to be available until 2011.

In the matter of Hi-Q, EPA stands ready to assist the State in the regulation of this facility. Feel free to contact me directly, or if you would like additional technical information, contact Kaushal Gupta at (312) 886-6803.

Sincerely,

Pamela Blakley

Pamela Blakley, Chief
Air Permits Section