

Jim Doyle, Governor
Matthew J. Frank, Secretary
Lloyd L. Eagan, Regional Director

P.O. Box 281
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53959
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January 4, 2008

Mr. Dale Drachenberg, Vice President Operations
Didion Milling, Inc.
501 South Williams Street
Cambria, WI 53923
Subject: Letter of Noncompliance

Dear Mr. Drachenberg:

I have completed my review of monitoring sample analysis from site monitor 550210018 that Didion Milling is required to have in place according to permit conditions of the last two construction permits issued [06-DCF-166 and 07-DCF-003]. I was able to complete my investigation with the submittal of the requested wind rose data on December 28, 2007.

In reviewing the laboratory data from the analysis of the sample filters, the grain dust portion ranged from a low of 47% to a high of 95%. You indicated in your letter of December 7, 2007 that these 5 sample exceedances were due to construction activities associated with the new expansion. While all samples had an inorganic contribution of greater than 10%, the May 24 sample was there a very significant contribution [34%] which may be of that origin, the majority material collected was grain dust. Since Didion Milling is the only operation that may be a source for the grain dust during this time frame, the responsibility of the exceedances is Didion's and thus the basis for this Letter of Noncompliance.

There were additional samples that indicated a NAAQS exceedance as well, but due to lack of sufficient sample time collection, were disallowed. Your letter of December 7 indicates that Didion assumes the responsibility for those sampling dates as well. You indicated that the source for these exceedances was the North truck/rail unload and Mill truck bulk load out and that plastic strip doors had been installed.

In reviewing the fugitive dust plan and malfunction and abatement plan, there are many proactive measures being taken with regard to monitoring of control device pressure drops. You also mention observations of fugitive dust by personnel. I do have a concern that no one has the specific task for frequent observation of potential stack emissions as well as fugitive dust. I would suggest that someone at the facility become certified to read visible emissions and have as a job duty to view stack emissions, as well as fugitive dust, several times a day and maintain a log of these activities. By only relying on pressure drop readings once per day/shift, control system malfunctions may go unnoticed for several hours. As your certified reader becomes familiar with the emission sources and devises strategies to resolve your company's culpability for these exceedances, I ask that you please update your plans as appropriate and notify me of the changes. Your ability to devise a more comprehensive procedure(s) for controlling dust emissions may factor in the final determination of these exceedances. Should you have any questions, I can be reached at 608-768-5693.

Sincerely,

/s/ *Michael R. Sloat*

Michael R. Sloat, Compliance Inspector
South Central Region

c: Colin Duffy AM/7
SCR Files