CORRESPONDENCE/MEMORANDUM

State of Wisconsin

DATE: 03/21/2006 FILE REF:

TO: Didion File

FROM: Mike Sloat

SUBJECT: Site Visit of 3/18/2006

I performed an unannounced site visit to Didion Milling, located in Cambria, Wisconsin on March 20, 2006. I met with Dale Drachenburg, plant manager.

I told him that the visit was to see how compliance with the NSR permit issued on May 12, 2005, permit number 02-RV-166.

Basically, the findings of the visit include the following:

1) For S01/P01 - no malfunction prevention abatement plan done as of yet. However, there is no definitive timeline in the permit for it to be done as of now. I have to assume then that as long as the MPAP is done by the end of the construction permit, they are in compliance. Dale Drachenburg and I went over what is required and where the requirements lie in NR 439.

2)S08/P08 - no malfunction prevention abatement plan [MPAP]

3) S10/P10 - no MPAP

4) S11/P11 - no MPAP

5) S12/P12 - no MPAP

6) S14/P14 - no MPAP

7) S17/P15 - no MPAP

8) S21/P19 - no MPAP

9) S22/P20 - not installed this process as of yet. I informed him that the construction permit was going to expire and that unless an extension was requested, a new permit would need to be obtained to construct/finish construction.

10) S24A-E/P22 - have not installed any control device. This was due within 90 days of permit issuance. See next item for full discussion.

11) S25A-AO/P23 - have not installed any control device as of this date, due 90 days after permit issuance. Dale informed me that this has not been done as of yet. Dale said that according to engineers familiar with the silo construction and

the grain milling storage industry, there was a very real possibility that a pressure may develop within the silo that would cause a catastrophic failure. They were looking into the installation of a series of 3 baghouses that would take the exhaust flow from the silos. Each baghouse would be piped to a discrete number of silos. They were in the process of obtaining quotes on the installation. I asked why they had not contacted me regarding this development as there may have been a satisfactory "official" mechanism to allow for this. I also asked why when DNR had allowed them the flexibility of choosing a particulate matter control device, John Didion had been adamant on not using baghouses due to cost and that the compromise solution was the simple fabric socks. They had been aware of the limitations of such control devices and the requirement that very frequent manual inspections would be needed. An inference to corporate differences of opinion was all that could be offered.

12) S24A-E and S25A-AO - have not removed rainhats for unimpeded flow of exhaust. This relates to the above discussion as the rainhats were not removed to prevent precipitation from getting to dried corn.

13) Have not formally completed a fugitive dust plan. According to Dale Drachenburg, the elements are contained in individual standard operating plans for each process.

They appear to be taking the necessary pressure drop readings. I asked to see records of all pressure drop readings. The records are compiled in a large 3 ring binder and are grouped individually. I did a quick review of arbitrary selections of readings and all appeared to be in compliance with pressure drop ranges as required in the permit. I left without looking at all the readings because of an OSHA accident last year and there were going to be lawyers wanting to talk to everyone. I asked that since time was short, if they would send me the latest pressure drop readings for a more thorough review. They will be mailing me samples of the reports. [In my review of the samples, everything appeared to be in order.]

I inquired into the air monitoring station that is required in the permit. Dale said the station was in place and operational. Filter samples were being analyzed and there had been no violations detected. I inquired as to where it was located. He said it was in the NW corner of the facility. I questioned the placement, but was told that is where Bruce Rodger had indicated the station to be set up.

I observed no fugitive emissions or opacity coming from any of the stacks. Paved roads were in good condition with very little in the way of material which could become airborne due to truck traffic. There did not appear to be any further construction of air emission sources at the facility.

C: Pam Kober – SCR Enforcement