DEPARTMENT OF ENVIRONMENTAL QUALITY AIR QUALITY DIVISION

ACTIVITY REPORT: Scheduled Inspection

N	175	82	41	56	4

11.00211001					
FACILITY: MICHIGAN AGRICULTUR	SRN / ID: N7582				
LOCATION: 103 WATER ST, NEWA	DISTRICT: Grand Rapids				
CITY: NEWAYGO	COUNTY: NEWAYGO				
CONTACT: Mitchell Murray, Branch	ACTIVITY DATE: 09/14/2017				
STAFF: Adam Shaffer	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR			
SUBJECT: Scheduled, unannounced inspection.					
RESOLVED COMPLAINTS:					

Air Quality Division (AQD) staff Adam Shaffer (AS) arrived at the facility at 1:20 pm on September 14, 2017 to complete a scheduled, unannounced inspection. The weather conditions were low 70s F, overcast conditions and light winds.

Facility Description

Michigan Agricultural Commodities (MAC) is a grain storage facility and currently is in operation without a permit; however, based on the date of installation of all equipment, they are subject to New Source Performance Standards (NSPS) Subpart DD – Standards of Performance for Grain Elevators.

Compliance Evaluation

Prior to entering the facility, offsite odor and visible emission observations were completed. No odors were observed off site and the only operation running at the time of the inspection was loading of a truck via a front loader in the what was later identified as the cob plant area. No significant emissions were observed during loading operations.

Upon entering the facility, AQD staff AS met with Mr. Mitchell Murray, Branch Manager, and Mr. Josh Spegel, Safety & Security Manager. The purpose of the inspection was explained to Mr. Spegel and Mr. Murray, and included a facility walk through and wrap up discussion.

Since the last site inspection in 2008 several additions have been added to the MAC facility and are listed below.

- A 46,138,000 BTU/hr column dryer with a screen size of 0.0625 inches was installed on May 31, 2012. This dryer was later observed during the facility walk through. Opacity testing of the dryer was previously completed; however, a copy of the test report was stated by MAC staff to have been lost during a staff change in June 2012. It was concluded by AQD staff that no violation notice (VN) will be issued provided MAC retests the dryer for opacity and submits the results by the end of the fiscal year. A second column dryer that was previously installed was also noted during the inspection. In a follow up phone conversation on September 21, 2017 the screen size for the second dryer was confirmed to be 0.078 inches.
- An unloading leg was installed and opacity testing was completed on November 19, 2013. A copy of the
 test report was requested and provided. The opacity test results were 0% opacity throughout the entire
 testing period and was concluded to be acceptable.
- A river pit with dimensions 2 ft by 10 ft was previously installed. In 2011 the pit was expanded to 10 ft by 15 ft. Opacity testing of the river pit was previously completed; however, a copy of the test report was stated by MAC staff to have been lost during a staff change in June 2012. It was concluded by AQD staff that no VN will be issued provided MAC retests the river pit for opacity and submits the results before the end of the year.
- The main pit with a 450-bushel to 700-bushel capacity limit was installed and tested on November 9, 2015. A copy of the opacity test report was requested and provided. Reviewing the opacity results, the highest 6-minute average opacity reading was approximately 3.489% opacity. After further review of the opacity test report it was deemed acceptable.

Based on the screen size of the two column dryers used on site, all grain based equipment appears to be

exempt per Rule 285(2)(p). Storage on site at the time of the facility inspection included white wheat, corn, red wheat and oats. During truck loading operations, six spouts were observed that have been installed. MAC staff stated how during operations the spouts will extend down into the truck and rise as it is being filled, thus limiting the amount of opacity emissions during loading operations. The cob plant portion of the facility including the loading area was observed. This area of the facility is used for overflow when the main storage silos are already in use. No excessive waste grain was observed throughout the facility walk through. One parts washer was observed in the maintenance area of the site. The parts washer was closed at the time of the inspection. Based on the size of the parts washer (less than 10 square feet) it appears to be exempt per Rule 281(2)(h). Several pieces of equipment including a drill press, grinder, and band saw were also observed and appear to be exempt per Rule 285(2)(I)(vi)(A).

Conclusion

A final discussion was held with AQD staff and Mr. Murray. Based on the review of the records provided and the facility walk through, MAC is in compliance with all applicable air pollution rules and regulations at this time. Opacity testing will be required to be completed for this production year for the river pit and dryer with the test results submitted to AQD to verify compliance. If noncompliance is identified from the opacity test results then an addendum will be made to this report.

NAME

DATE

SUPERVISOR