DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: On-site Inspection

P141370696

FACILITY: LINEAGE LOGISTICS		**SRN / ID:** P1413
LOCATION: 1151 S GRISWOLD STREET, HART		**DISTRICT:** Grand Rapids
CITY: HART		**COUNTY:** OCEANA
CONTACT: Glendon Sutliff , General Manager		**ACTIVITY DATE:** 01/11/2024
STAFF: Scott Evans	**COMPLIANCE STATUS:** Compliance	**SOURCE CLASS:** Minor
SUBJECT: On-site inspection to assess compliance with newly issued permit requirements.		
RESOLVED COMPLAINTS:		

Introduction

On January 11, 2024, State of Michigan Department of Environment, Great Lakes, and Energy Air Quality Division staff members Scott Evans (SE) and Laura Martin (LM) conducted an on-site inspection of the Lineage Logistics facility located at 1151 South Griswold St. in Hart, Michigan, to assess compliance with permitted requirements and all other applicable air quality rules and regulations. Lineage Logistics is a large-scale refrigeration facility that stores products such as frozen foods and produce prior to shipping to other facilities. This facility is classified as a minor source for all air pollutants and has one active Permit to Install (PTI): PTI No. 151-23.

Upon arrival at the facility, SE and LM conducted a perimeter inspection. No visible emissions were observed, and no odors were observed. SE and LM then entered the facility and were greeted by Glendon Sutliff (GS). After a discussion to explain the purpose of the visit, an inspection of the facility was conducted.

PTI No. 151-23

This PTI includes requirements for one emission unit (EU): EUREFRIG. This EU consists of an anhydrous ammonia refrigeration system with a high pressure receiver, high temperature recirculator tank, low temperature recirculator tank, multiple evaporators, and condensers.

This EU has four process restrictions. The first states that the process shall comply with the American National Standard for Safe Design of Closed-Circuit Ammonia Refrigeration Systems, ANSI/IIAR 2. During the inspection, documentation demonstrating these requirements was reviewed and appeared to meet requirements.

The second requirement states that the facility shall not operate EUREFRIG unless an emergency response plan, to be followed in the event of an emergency, has been approved by the local fire department or county emergency response agency and is implemented and maintained. A copy of this plan was reviewed during the inspection and a digital copy was provided to the AQD.

The third requirement states that all transfer operations including transport deliveries must be performed by a reliable person properly trained and made responsible for proper compliance with all applicable procedures. This was discussed and staff on site are well versed in the transfer of anhydrous ammonia. This is not a regular occurrence as the refrigeration system is a closed system and recharging is only necessary on occasion when the required levels are low due to leaks.

The final requirement is that vapor return lines shall be employed whenever necessary to ensure an accidental release from pressure relief valves will not occur during ammonia transfer operations. This was discussed and procedures are set to adhere to this requirement.

This EU has one design parameter that states any vapor or liquid line equipped with a mechanical connector, exclusive of couplings, requiring venting after ammonia transfer to an ammonia storage tank shall be purged into the storage tank or returned to the supplying vessel, or vented through a control device to minimize the release of ammonia emissions to the atmosphere. During a review of safety plans it could be seen that all such connectors are designed appropriately to ensure safety of facility staff and neighboring locations. Additionally, the facility inspection confirmed that equipment was properly equipped with necessary connectors that were all in good condition.

This EU has one recordkeeping requirement that states that a copy of the currently approved emergency response plan with the local fire department be dated and on site for review. The provided safety plan includes emergency response procedures and could be seen during the inspection to have appropriate dates and signatures.

Other Items

On August 22, 2023, it was reported through the Michigan PEAS system that an ammonia leak occurred at the facility. At the time, the facility had enacted appropriate safety measures and, in conjunction with local fire department assistance, were able to contain and halt the leak without injury to facility staff or community members. No violation notice was issued in response to the leak as it had been contained within hours of the leak. It was at this time that the facility was discovered to be out of compliance with air permitting exemption rules and would require a Permit to Install. As this facility had only been recently purchased by the current owners who were not made aware of the need to obtain a permit, no violation notice was issued with the expectation that the facility pursues permitting as soon as possible. The facility applied for the current PTI in October of 2023 and the permit was issued on December 21, 2023. At this time there are no ongoing leaks at this facility.

Conclusion

At the conclusion of this inspection the facility appeared to be compliant with all permit requirements as well as all other air quality rules and regulations.

NAME Scott Evans DATE 1/30/2024 SUPERVISOR HH