DEPARTMENT OF ENVIRONMENTAL QUALITY AIR QUALITY DIVISION ACTIVITY REPORT: Scheduled Inspection

P043630260

FACILITY: MICHIGAN AGRICULTURA	L COMMODITIES INC NEWTON ST	SRN / ID: P0436
LOCATION: 305 N NEWTON STREET	MIDDLETON	DISTRICT: Lansing
CITY: MIDDLETON		COUNTY: GRATIOT
CONTACT: John Ezinga , Manager		ACTIVITY DATE: 06/24/2015
STAFF: Michelle Luplow	COMPLIANCE STATUS: Compliance	SOURCE CLASS: Minor
SUBJECT: Unannounced, scheduled compliance inspection. This was the first time this facility had been inspected since permit issuance in		
2013.	· ·	
RESOLVED COMPLAINTS:		

Inspected by: Michelle Luplow

Personnel Present: John Ezinga, Manager (jezinga@michag.com)

Other Relevant Personnel: Pam Thebo, Office Manager (pthebo@michag.com)

<u>Purpose:</u> Conduct an unannounced, scheduled compliance inspection by determining compliance with Michigan Agricultural Commodities' (MAC) Permit to Install (PTI) No. 49-13 for a fertilizer blending and storage facility. This will be the first time since permit issuance that this facility has been inspected.

Facility Background/Regulatory Overview: Michigan Agricultural Commodities (MAC) is a fertilizer storage and blending facility (EUPROCESS) that receives fertilizer by rail and by truck to be stored in a storage house, blended and loaded out for sale. It is located a few blocks and across the street from the MAC grain elevator located on N. Caroline St in Middleton. The fertilizer blending and storage facility is its own separate entity from the MAC grain elevator: the Newton St facility does not support the Caroline St facility and vice versa.

John Ezinga, Manager, said this facility was constructed and installed sometime during February or March of 2014.

Attached to this report are photos of the facility. Photos show both truck and rail unloading areas/dump pits (both unenclosed), the storage piles within the building where the unloaded fertilizers are sorted, the fertilizer blending hoppers and drum (where the urea, calcium, potash, etc is blended), and the loadout spout from the blending unit.

Inspection: This was an unannounced compliance inspection. At approximately 8:40 a.m. on June 24, 2015 I met with John Ezinga, Manager. I explained to J. Ezinga what to expect during an Air Quality inspection. I had previously provided him with a DEQ "Environmental Inspections: Rights and Responsibilities" brochure during the November 28, 2012 inspection of MAC located at 306 N. Caroline in Middleton.

PTI No. 49-13 for EUPROCESS

Visible emissions from all wheel loaders associated with the fertilizer blending/receiving are required to be under 5% opacity at all times, per Method 9D. Although I did not conduct a Method 9D I viewed two trucks driving through the facility's unpaved roads, which kept a reasonable speed through the plant yard, and the opacity was at or below 5% as they drove through. MAC is in compliance with the permitted opacity limits from truck traffic at this time.

There is also the requirement that no visible emissions be present from any of the enclosed conveyors, enclosed bucket conveyors, or the enclosed building, however no product was being conveyed or loaded out during the inspection to check for compliance with this condition. J. Ezinga said that when product is loaded out through the enclosed conveyor connected to the blending unit dust is generated within the truck as the product is being loaded, but the loadout spout does have a telescopic chute.

MAC is allowed to process up to 50,000 tons of material through the facility per 12-month rolling time period. P. Thebo provided me with inbound and outbound tonnage from June 2014 – May 2015. The 12-month rolling inbound tonnage was 28,105, which is well below the 50,000 ton limits. MAC is in compliance with the material limits at this time.

The Fugitive Dust Control Program for all plant roadways, the plant yard and material storage piles and material handling operations referenced in Appendix A of the permit must also be implemented.

Applications of water, calcium chloride or other fugitive dust control compounds are required on all roadways and the plant yard, and records shall be kept of the applications. Although J. Ezinga hasn't been keeping records, he recalled that the last application of calcium chloride was May 1, 2015. He assured me in an email following the inspection that dust suppressant records are now being kept.

All paved roadways and plant yards and any material spillage on the roads is required to be swept up immediately. During the inspection the roadways were virtually clean of all material spillage and dust.

All material storage piles are located within the storage building, the storage building itself was also virtually free of raw material on the loader traffic areas.

Trucks are allowed to travel at speeds up to 5 mph through the property. While viewing the trucks traveling into the facility I was not able to determine exact speeds, but they were moving at a relatively low speed. J. Ezinga said he has ordered speed limit signs and intends them to post them at the property to ensure that the truck drivers know the appropriate speed to travel at.

Currently MAC is in compliance with all conditions in the permit and Fugitive Dust Control Plan, as well as any state and federal applicable re quirements at this time.

MM 1/1 NAME

date <u>7-22-15</u>

SUPERVISOR