

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

B539627546

FACILITY: CITIZENS ELEVATOR		SRN / ID: B5396
LOCATION: 415 NELSON ST, POTTERVILLE		DISTRICT: Lansing
CITY: POTTERVILLE		COUNTY: EATON
CONTACT: Bob Mansfield, Owner		ACTIVITY DATE: 10/22/2014
STAFF: Michelle Luplow	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: Unannounced, scheduled compliance inspection - includes determining NSPS DD subjectivity and MAERS reporting		
RESOLVED COMPLAINTS:		

Inspected by: Michelle Luplow (author) and Keisha Williams (AQD Toxics)

Personnel Present: John Pifer, Manager  
James Young, Office Manager ([jyoung@citizenselevator.com](mailto:jyoung@citizenselevator.com))

Other Relevant Personnel: Bob Mansfield ([bmansfield@citizenselevator.com](mailto:bmansfield@citizenselevator.com))

**Purpose:** Conduct an unannounced, scheduled compliance inspection by determining compliance with Citizens Elevator Permits to install (PTI) No.'s 4-86 and 567-88 for a Chicago Model 1500 continuous flow grain dryer and 1500 BPH QED grain dryer, and also to determine if Citizens is subject to the NSPS Subparts A and DD, Standards of Performance (NSPS) for Grain Elevators. This facility was last inspected in August of 1998.

**Facility Background/Regulatory Overview:** Citizens Elevator has several facilities throughout Michigan, with the accounting/merchandising office located at 421 N. Cochran Rd in Charlotte. Other facilities include Otto Rd in Charlotte and the Battle Creek. The Potterville Citizens Elevator is a grain handling operation that receives grain via truck and loads grain out via truck and rail. (Although John Pifer explained that the rail loadout hasn't happened in a number of years). Commodities include corn (majority is used for ethanol production), soybeans, and wheat (human consumption). Citizens also stores/sells dry fertilizer and handles liquid fertilizer (i.e., railcars transporting liquid fertilizer arrive at Citizens where the fertilizer is directly transferred from the railcar to the trucks. I viewed one of these transfers during the inspection). J. Pifer said that Citizens used to handle anhydrous ammonia. There were no anhydrous ammonia tanks located on site during the inspection.

The previous inspections conducted at this site were a result of dust complaints from the truck unloading stations and beeswings. There were no grain loading or unloading processes being conducted during the time of the inspection. There was, however, beeswing fallout from the operating grain dryer. After the inspection, K. Williams and I returned to the car to find a minor amount of beeswing fallout accumulation (~45 minutes-worth) on the windshield and hood of the car. No documented complaints have been received since the 1998 inspection. The elevator yard itself was clean and except for a few small spots of beeswing accumulation near the bases of the storage silos.

**Inspection:** This was an unannounced scheduled compliance inspection. At approximately 8:45 a.m. on October 22, 2014 I met with John Pifer, Manager, and James Young, Office Manager. I explained to them why I was there and provided them with a DEQ "Environmental Inspections: Rights and Responsibilities" brochure to illustrate what happens during a typical inspection procedure.

J. Pifer said that the two permitted dryers under PTI's 567-88 and 4-86 were removed and replaced with 2 identical Quality Efficiency Dependability dryers (QEDs) which burn natural gas. One of the two dryers was not operating so J. Pifer allowed Keisha and I to view the inside to verify that column plate perforations were less than the 0.094", a requirement that must be complied with in order for the grain dryers to be exempt from permitting (Rule 285(p)). The perforations appeared to be the appropriate size to meet the exemption. I will request that PTI's 567-88 and 4-86 be voided because the grain dryers associated with these permits have been removed.

In addition to the 2 grain dryers, Citizens also has 2 dump pits and 4 truck load outs, and 20 bins in various sizes (see attachment for the list of bins present on site, which J. Pifer provided to me).

According to J. Pifer, the Potterville elevator has a permanent storage capacity of approximately 800,000 bushels. In order to trigger 40 CFR 60, New Source Performance Standard DD, a grain elevator must have greater than 2.5 million bushels of permanent storage capacity. At this time, Potterville Citizens is not subject to NSPS DD. If Citizens Potterville ever exceeded 2.5 million bushels of permanent storage capacity, they would become subject to NSPS DD and automatically have to report to MAERS.

According to Angie Maguire, Citizen's VP of grain, the total throughput for the 2013 calendar year was 850,000 bushels. According to the white paper "Calculating Potential to Emit (PTE) and Other Guidance for Grain Handling Facilities" dated 11/14/95 from John Seitz, Director of the Office of Air Quality Planning and Standards, truck or rail receiving/truck or rail shipping (which is used at Citizens) has an associated PTE of 50 tons/year of PM-10 emissions for a throughput of 14 million bushels.

Assuming a linear relationship between the number of bushels and PM-10 emissions, the PTE PM-10 emissions from Citizens Potterville for approximately 850,000 bushels would be approximately 3 tons/year. Citizens would have to be emitting 15 tons of PM-10 per year in order to be required to report to MAERS.

Citizens Potterville is in compliance with all applicable permit conditions and applicable state and federal regulations at this time.

NAME Michelle Lybster

DATE 10-24-14

SUPERVISOR M. Webb