

DEPARTMENT OF ENVIRONMENTAL QUALITY  
AIR QUALITY DIVISION

ACTIVITY REPORT: Self Initiated Inspection

B736430652

|   |                               |                           |
|---|-------------------------------|---------------------------|
| FACILITY: Crop Production Services  |                               | SRN / ID: B7364           |
| LOCATION: 211 REESE ST, WOODBURY  |                               | DISTRICT: Lansing         |
| CITY: WOODBURY  |                               | COUNTY: EATON             |
| CONTACT: Mark Alverson ,  |                               | ACTIVITY DATE: 08/04/2015 |
| STAFF: Michelle Luplow  | COMPLIANCE STATUS: Compliance | SOURCE CLASS: MINOR       |
| SUBJECT: Self-initiated, unannounced compliance inspection to determine compliance with CPS' newly issued permit, PTI No. 7-15. |                               |                           |
| RESOLVED COMPLAINTS:  |                               |                           |

Inspected by: Michelle Luplow (author), Nick Zabrodsky (AQD permit section)  
Personnel Present: Mark Alverson (mark.alverson@cpsagu.com)

**Purpose:** Conduct an unannounced, self-initiated compliance inspection by determining compliance with Crop Production Services' (CPS) General Permit to Install (PTI) No. 7-15 for anhydrous ammonia storage and handling.

**Facility Background/Regulatory Overview:** Crop Production Services is a leading provider of agricultural inputs, including fertilizers, herbicides, insecticides and fungicides. The Woodbury location is a retail location that sells both liquid and dry fertilizers. The facility is located in a commercial, light industrial area just north of M-43 and east of M-66 in Woodbury. During the September 2014 inspection of the facility it was recommended by Brad Myott (LDO) that CPS obtain a general permit to install for their 2 anhydrous ammonia tanks, 18,000 gallons and 30,000 gallons, located onsite, but which have been installed since the 1950's according to the 2014 report. The general PTI was issued February 10, 2015. The General Permit to Install special conditions are created based on consideration of Best Available Control Technology for toxics (T-BACT), the American National Standard (ANSI) for Safety Requirements for the Storage and Handling of Anhydrous Ammonia, and MIOSHA requirements summarized in the Department of Labor and Economic Growth General Industry Safety Standards, Part 78 for Storage and Handling of Anhydrous Ammonia (1910.111).

**Inspection:** This was an unannounced compliance inspection. At approximately 11:20 a.m. on August 4, 2015 N. Zabrodsky and I met with Mark Alverson. I explained to him that I was there to inspect the newly permitted anhydrous ammonia tanks. This is the first inspection of the anhydrous ammonia tanks to be conducted since the general permit was issued. I provided M. Alverson with a DEQ "Environmental Inspections: Rights and Responsibilities" brochure to illustrate a typical inspection procedure.

M. Alverson explained that the planting season is from April 1<sup>st</sup> – June 1<sup>st</sup> and that they fill the permanent storage tanks in the winter for that season. He also said that CPS is removing themselves from the anhydrous ammonia business. M. Alverson said that they disconnected their 2 anhydrous ammonia tanks at the end of June 2015. M. Alverson showed me the risers for the 18,000 gallon tank and that the lines from the tank to the riser rack (where the nurse tanks were filled from) have been permanently removed (the metal pipelines were cut and removed). I checked the gauge on the 18,000 gallon tank, which showed that the tank was empty (0% full). M. Alverson plans to sell the 18,000 gallon tank. The 30,000 gallon tank, located in the back of the facility, has also had piping removed. All the piping at the bottom of the tank and from the top (the vapor lines) have been torn off, including the piping that was connected to the risers. At this time CPS is not sure how they will remove the 30,000 gallon tank, only because of its size, weight, and the location in proximity to the other agricultural liquid tanks. He said they are also currently using 5-6 nurse tanks from their fleet, the "left over" anhydrous ammonia from this season, that they will use before doing away with anhydrous ammonia completely. M. Alverson said the nurse tanks may be sold once CPS uses all of the remaining NH3. M. Alverson hopes that the anhydrous ammonia from the remaining nurse tanks will be used during the fall application season. It is my professional opinion that both permanent storage tanks have been rendered permanently inoperable at the site. I mentioned to M. Alverson that he may want to get the permit voided, but he said he wanted to keep the permit just to be safe.

### **FGNH3TANKS – EU30000NH3 & EU18000NH3**

#### **III. Process/Operational Restrictions**

CPS is required to comply with the Appendix A Inspection and Maintenance program for the nurse tanks and permanent storage tanks. M. Alverson provided me with the inspection lists that they use for the nurse tanks and those that they use for the permanent storage tank. For the permanent storage tanks, they use their inspection sheet on a monthly basis: see the "Agrum Retail" Monthly Ammonia Storage Facility Inspection Report" attached. While this is not the inspection list in Appendix A, it encompasses all the items in the inspection sheet provided in Appendix A. The monthly inspections of the tank also meet the requirement of having to conduct inspections twice per year, prior to spring and fall application seasons.

M. Alverson said the nurse tank inspections are conducted every time the nurse tanks are being used, otherwise they are inspected every 3 years via the "Nurse Tank Inspection Report," attached, or every time they were being loaded from the rack. The permit's Appendix A for the nurse tank inspections and maintenance require that the inspections be performed on a daily

basis and documented at the permittee's discretion. All maintenance and repairs are required to be documented. Because the nurse tanks are inspected whenever they are used (which is nearly every day per nurse tank), this satisfies the inspection requirement for the nurse tanks.

An emergency response plan (ERP) is also required and it is to be reviewed by the local fire department or emergency response agency annually. M. Alverson showed me the "Handi-Plan" emergency response plan that CPS uses and provides to the Local Emergency Planning Committee (LEPC) for review and approval. He said that the plan is posted in every building onsite. He explained that every March the LEPC gets a copy of the ERP and gives CPS verbal approval of the plan during their annual SARA Title III meeting, in which CPS invites all emergency personnel, including the local fire department. This satisfies the requirement to have a plan that is annually approved.

CPS is also required to allow only properly trained persons to conduct the transfer operations for all transport deliveries. M. Alverson said that he has 6 people onsite that are trained in anhydrous ammonia transfer, who also make sure that the water tanks are full, that there is no leaking from the valves, conduct walk-arounds on the tires and that all moving parts are properly greased. CPS meets the requirements of having properly trained personnel conducting the transfer operations.

Using an aerial map (see attachment), CPS' permanent anhydrous ammonia tank and nurse/appliator tanks are determined to be stored at a distance greater than 50' from the property line, as required by permit. The closest residence in proximity to the nurse tank storage area is approximately 250' away, and the closest residence to the closest permanent storage tank is approximately 230' according to the Google Maps scale. The permit requires that the nurse tanks and permanent storage tanks be 150' and 200', respectively, from residences. CPS is in compliance with these distance requirements. There are no schools, apartment buildings, institutions or hospitals/nursing homes within the permitted distance limits near CPS at this time.

#### IV. Design/Equipment Parameters

Signs are required to be present and conspicuously placed at the facility entrance with emergency names and contact numbers. I verified that there was a sign, and it is placed on the fence at the entry point into the facility's yard.

**Compliance Statement:** At this time, CPS is in compliance with their General PTI conditions for Anhydrous Ammonia Storage and Handling, and all state and federal requirements at this time.

NAME Michael Lipton

DATE 9-30-15

SUPERVISOR B. M.