

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION

ACTIVITY REPORT: Scheduled Inspection

D126332387

FACILITY: EATON FARM BUREAU CO-OP		SRN / ID: D1263
LOCATION: 2328 E CLINTON TRAIL, CHARLOTTE		DISTRICT: Lansing
CITY: CHARLOTTE		COUNTY: EATON
CONTACT: Larry Crouch , General Manager		ACTIVITY DATE: 11/20/2015
STAFF: Michelle Luplow	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: Unannounced, scheduled compliance inspection to determine compliance with PTI No. 650-83 and determine applicability of the NSPS Subpart DD.		
RESOLVED COMPLAINTS:		

Inspected by: Michelle Luplow (author, LDO) and Nathan Hude (Lansing District Office)

Personnel Present: Larry Crouch, General Manager (LCrouch@eatoncoop.com)

Purpose: Conduct an unannounced, scheduled compliance inspection by determining compliance with Eaton Farm Bureau's (EFB) Permit to Install (PTI) No. 650-83 for two 150,000 bushel grain storage bins and one 3000 bushel/hour Chicago grain dryer, in addition to determining the applicability of NSPS Subparts A and DD, Standards of Performance (NSPS) for Grain Elevators. There are currently no records in MACES or in the General County file that this facility has ever been inspected.

Facility Background/Regulatory Overview: Eaton Farm Bureau Co-op is a farm cooperative that is farmer-owned. They receive and sell corn, oats, wheat and soybeans from farmers. They also have an animal feed plant on the property where they mix grain with other additives. The animal feed plant has 10 bushels of storage for feed ingredients such as soybean meal and distiller's grain. According to L. Crouch, the elevator has been in existence since the 1950's. L. Crouch said EFB is a Licensed Agricultural Grain Dealer.

Inspection: This was an unannounced, scheduled compliance inspection. At 12:30 p.m. on November 20, 2015 N. Hude and I met with Larry Crouch, General Manager. I explained to him that we were there to determine compliance with PTI No. 650-83, and determine the applicability of the New Source Performance Standard (NSPS) Subparts A and DD for Grain Elevators to EFB. I provided him with a DEQ "Environmental Inspections: Rights and Responsibilities" brochure to illustrate what happens during a typical inspection procedure, as well as a July 2014 Permit to Install Exemptions handbook, pointing out to him where the exemptions were listed for grain elevator processes (R 285(o) & (p)).

EFB currently has at least 10 silos, 4 column grain dryers, 5 dump pits (3 are enclosed and the other 2 are not being used), truck loadout, and the capability for rail loadout but L. Crouch said they are currently not using it. All grain dryers appeared to have column plate perforations of less than 0.094 inches, which meets exemption Rule 285(p), and also the permit condition, which requires the same.

PTI No. 650-83

For all grain handling operations, EFB is required to keep all dust at or below the 20% opacity standard. During the inspection we witnessed one truck loadout. N. Hude and I agreed that, averaged over a 6-minute period, the opacity generated from the loadout would not exceed 20%. We saw no other visible emissions during the inspection. EFB is in compliance with this standard, as well as the 5% opacity standard for the permitted Chicago grain dryer.

EFB is only allowed to load trucks and railcars if the end of the loading spout is below the level of the top of the truck. L. Crouch said that all of the loadout areas that are outside have telescoping chutes that can go below the top level of the truck/railcar. EFB is in compliance with this condition at this time.

NSPS Subpart DD

According to L. Crouch, the EFB elevator has a permanent storage capacity of 2.3 million 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, EFB is not subject to NSPS DD. If EFB decides to build additional permanent storage that increases the permanent storage capacity above 2.5 million bushels, they are required to notify the DEQ that NSPS Subpart DD applies at that time. At that point it would also be beneficial for EFB to create a list of all new installations (i.e. installations that occurred after EFB exceeded 2.5 million bushels permanent storage capacity) of truck loading and unloading stations, railcar loading and unloading stations, grain dryers, and all grain handling operations. If EFB becomes NSPS DD subject, they will also automatically have to report to MAERS because of the NSPS applicability.

The newest installed equipment was a grain dryer in 2008 and 2 storage silos with 150,000 capacity in 2015.

MAERS

L. Crouch also said that the total throughput for the 2014 calendar year was 2.3 million 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 has an associated Potential to

Emit (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 PM-10 emissions from EFB 2.3 million bushels would be approximately 8.2 tons PM-10/year. EFB would have to be emitting 15 tons of PM-10 per year (equivalent to a throughput of 4.2 million bushels per year) in order to be required to report to MAERS.

Eaton Farm Bureau Co-op is currently in compliance with all applicable state and federal regulations at this time.

NAME M. M. Lupton

DATE 12-4-15

SUPERVISOR B. M.