

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

M365427639

FACILITY: CARGILL, INC.		SRN / ID: M3654
LOCATION: 110 SHERWOOD STREET, DECATUR		DISTRICT: Kalamazoo
CITY: DECATUR		COUNTY: VAN BUREN
CONTACT: Mike Borrie , Plant Manager		ACTIVITY DATE: 10/27/2014
STAFF: Dorothy Bohn	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT:		
RESOLVED COMPLAINTS:		

This was sort of an announced inspection. I had tried to inspect on Friday (10/24) arriving at the facility about 11:15 am. Michael Borrie, plant manager, had a meeting with Amtrack at 1 pm and it was almost lunch time so I told him I would come back on Mon (10/27). Prior to going to the office on 10/24 I drove around the facility and took a few pictures (attached). I did not observe any visible emissions but there was some dust visible around vents on the tops of the silos and near one conveyor along the top of the silos on the NW side of the tracks. Other than that it looked pretty clean.

Before going to the facility office on the 27th I drove around the plant once. There did not appear to be as much activity as on Friday. I arrived at the office at 1 pm, asked for Michael and was told to drive over to the scale house at the center of the SE side of the plant.

The facility requires a safety vest, hard hat and safety glasses. First we toured the facility then reviewed records. They are mostly getting beans right now. Corn is later than normal due to immaturity. Michael said they do not have any cold cleaners, boilers (they have furnaces), or generators (fire pumps or electric). There is a building on the very SE side of the facility with a cyclone on the back. This is used for storage but Michael thinks a long time ago woodworking was done in there. The company's fiscal year is June through May.

The company got their first PTI #103-13 on 8/16/13 and began operation on 8/19/13. PTI #103-13A was issued on 8/22/14. The revised PTI has some higher throughput limits and takes the graduated process limits out of FGGrain since the control equipment is now installed.

EUDryFertilizer: This was not operating as it is primarily a spring time operation. Material unloading to storage bins occurs in a building. The scale is also inside at the north end of the wall. Material from the scale conveys through the wall to outside, then either into the blender or to a truck loadout. Michael said that a metal telescoping piece is added to the end of the conveyor to reduce emissions during truck loading. There is probably some dust that gets emitted from the scale and blender. Michael said that the scale is certified every 6 months (a Cargill policy, Ag requires once/year).

All trucks bringing in material for this operation go through the main scale house and they use those numbers for their recordkeeping. Michael said that they calculate their material processed by adding the amount of material that received with the amount that goes out and dividing by 2. He said this is how it's always done. This didn't seem quite right to me. I discussed it with my boss and she agreed that it should be what is going out. I will email Michael that it should be what goes out. Their records show that the highest monthly total was 1591 tons and the next highest was 4/14 at 709 tons. They have just completed 12 months of operation. The records were complete but a little hard to read the way they were set up. But at this level they are below their limit.

EULiquidFertilizer: This consists of 2 large tanks located between the main office and the dry fertilizer building that contain a mix of liquid nitrogen and water, the building just north of the dry fertilizer building and several smaller tanks on the NW side of the tracks south of the main office. I observed in this last area: tanks #13-17 were horizontal 10-11K gallons holding polyblend; two 2.5K and two 5K vertical tanks; three 12K, a 15K and 10K horizontal tanks. Michael said they plan to remove these tanks. There were also 2 vertical 20K tanks here that Michael said were to be moved to the area north of the dry fertilizer building. He said that the material over drive alongside these tanks is removed in the spring and there is cement underneath that is used as secondary containment for the tanks when they are processing the liquids.

The truck scale and a flowmeter are used to determine the amount processed. The amount processed is being calculated the same as the dry fertilizer, in plus out divided by 2. Their highest month is June with 2496 ton and the 2nd highest was in May with 754 ton. They have 12 MRT and are way below their limit. This should also be calculated by output.

EUTruckTraffic & Appendix A: I observed 8 mph signs posted. There are no outdoor storage piles. They have a lot of brooms for sweeping and a nurse tank equipped with a water bar to apply water. They do not record when they water though. I suggested that they log this also. SW Michigan Dust Control comes when called and applies brine on the roadways. They came on 10/23, 9/23, 8/14 in 2014 and also in 10/2013. It rained a lot earlier this year so it was not needed then. Michael said that customer's trucks come in tarped and Cargill trucks go out with at least 6" of freeboard in order to meet DOT weights.

FGGrain: The baghouse on the truck unloading was running but nothing was being loaded at first. The pressure drop was 0.0-0.1" H₂O which is really low. They had a log of readings for every day they operate. Michael said that the each baghouse has a sensor that alarms if a bag becomes disconnected. EUGrainReceivingN just started operating on 10/13/14. It has taken in 127,000 bushel since the 14th. North Receiving pit 2 is currently out of commission and maybe be permanently (the floor is not safe). Silos B11 and B12 have not been installed yet. It will probably be this spring.

When operating under the original PTI they tracked the amount of grain dried and received daily. From 8/16/13 until 8/31/14 they dried 2.359 MM bushels and took in 5.743 MM Bushels of grain. So that appears to comply with the limit in II.1. The 12 MRT for grain receiving/handling/storage was 5.734 MM bushel at the end of August, 2014, truck loading was 334,000 bushels and rail loading was 4.927 MM bushel at the end of 9/2014.

Condition III.2 requires a MAP to be submitted within 60 days of the control device being installed/implemented. At the time of the inspection this had not been submitted to the AQD. They completed the installation of the baghouse on SR2 on 6/25/14 and on NRL1 on 8/29/14. It is well past the 60 days for SR2 and just at the end of it for NRL1. I was given a copy of the PM/procedures at the inspection and the next day I received an email with additional information and another copy of the PM/procedures. This will be placed in a blue MAP folder. The maintenance is scheduled by the computer and says who is responsible for doing the work.

The stack testing was performed on Sept. 10th and 11th. The report was received on 10/24/14. The report states compliance with the limits but is still under review by the division. Everything seemed to be labeled.

FGDryers: There are 2 natural gas-fired dryers that are the same size. Neither were operating. They dry mostly corn but some beans also. It was very clean around the dryers. The dryer logs record throughput in bushels/hr, and column (grain) and plenum (burner) temperatures every 30 minutes. The amount of grain dried is based on the amperage and speed of the dryer balanced by the truck scale numbers. At the end of 9/2014 they had dried 2.266 MM bushel on a 12 MRT and at the end of 8/14 it was 2.359 MM bushel. On 10/26 they dried 39,000 bushel but none on Sat (10/27).

Consent order #41-2014: Paragraph 9.B – The effective date was 7/10/14. On-site installation of the baghouse for SR2 began on 2/26/14, and was completed on 6/25/14. The notification was received on 7/11/14 (and via email on 7/8). Installation of the baghouse for NRL1 began on 6/2/14 (footings) and the baghouse itself on 6/23/14. This notification was received on 7/11/14 (and via email on 7/8). The installation of the NRL1 baghouse was completed on 8/29/14 and the notification was received on 10/8/14 (and via email on 9/2).

Paragraph 9.C: The testing was performed on 9/10 & 11. The test plan and notification of test date was received on 8/14/14. The test report was received on 10/24/14.

I left at 4 pm. The company appeared to be in compliance at the time of the inspection since the MAP/PM information was given to me.

Dorothy Behn 10/3/14

MO 11/3/2014

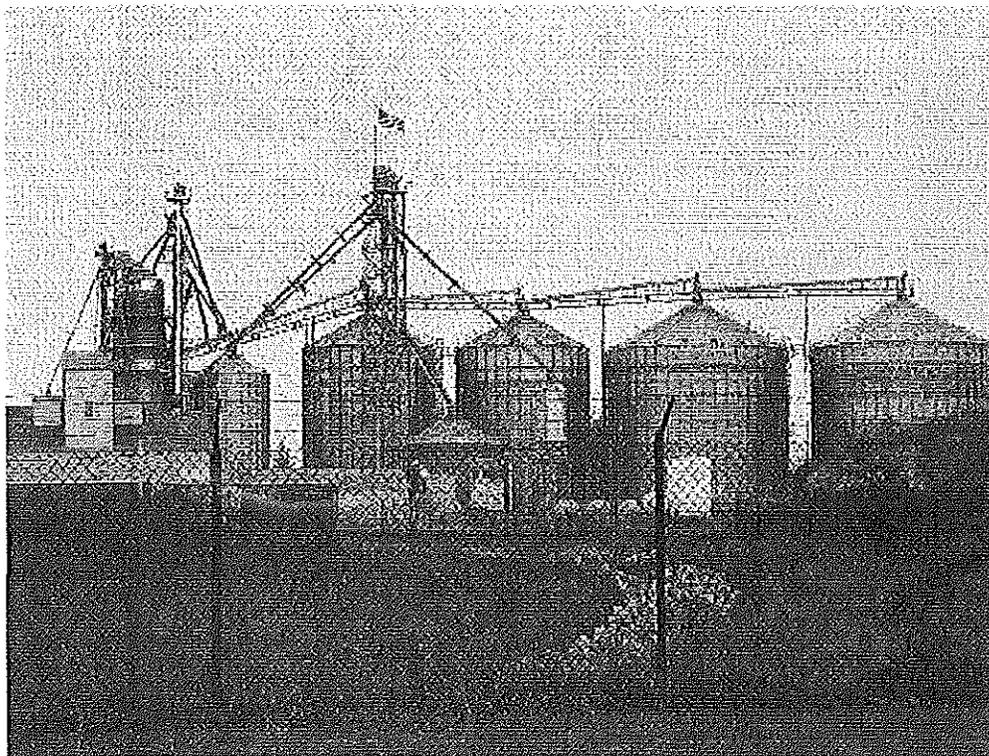


Image 1(Looking NW) : From Bronson St. - can see small tanks which are part of EU LiquidFert., silos and the corn dryer that are on the NW side of the RR tracks.

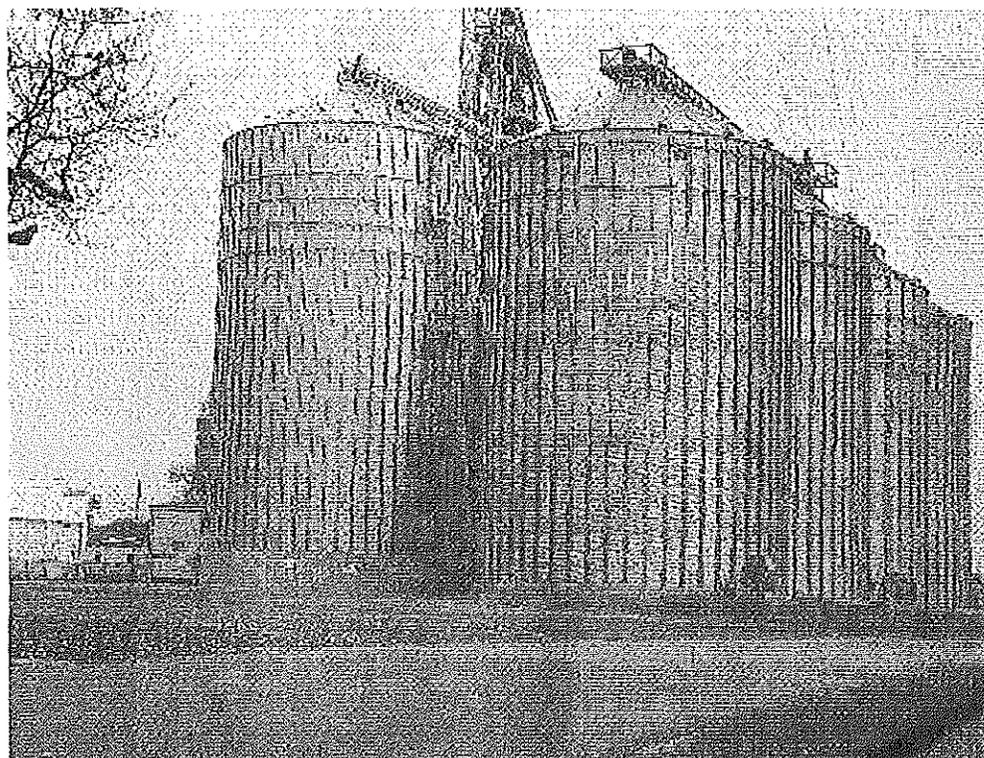


Image 2(Looking N) : from near Williams St and Beers St. The silos on the SE side of the tracks.



Image 3(SR1) : South Receiving pit in the middle of the silos. Looking NE from Williams St. Brown brick building is for storage.

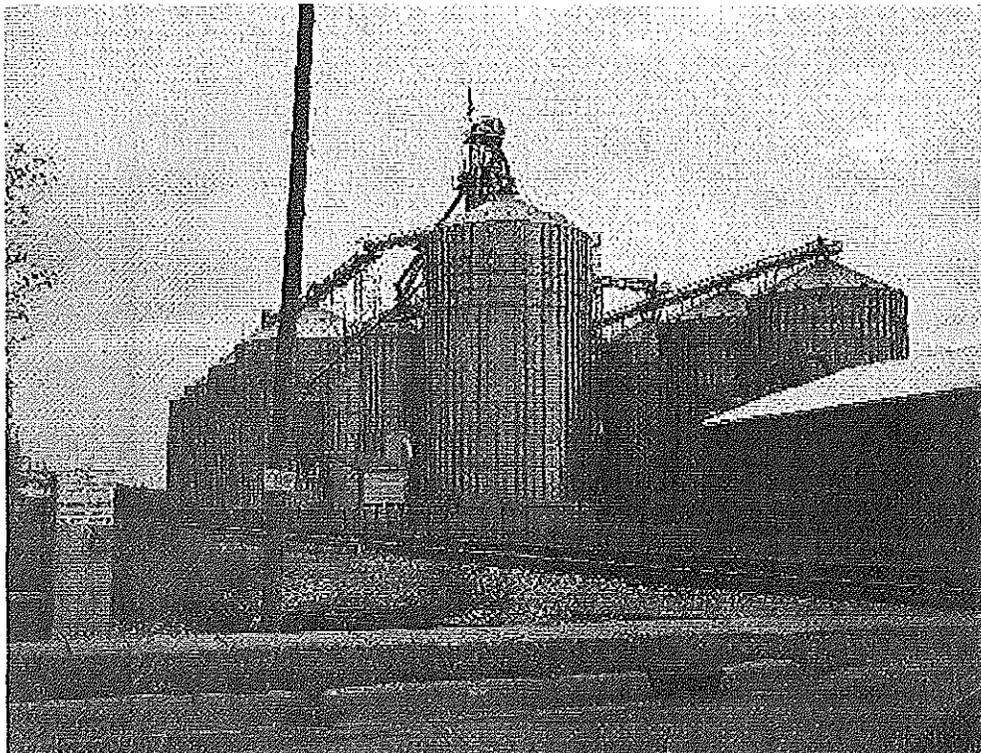


Image 4(South plant) : Looking NE from Williams St. Truck loadout and receiving pit.