

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

M392745746

FACILITY: The Andersons Reading Grain Operations		SRN / ID: M3927
LOCATION: 313 S. ANN ST, READING		DISTRICT: Jackson
CITY: READING		COUNTY: HILLSDALE
CONTACT: Jake Drake, Operations Supervisor		ACTIVITY DATE: 08/23/2018
STAFF: Brian Carley	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: Unannounced scheduled inspection		
RESOLVED COMPLAINTS:		

Facility Contact: Jake Drake, Operations Supervisor
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Purpose

This was a targeted, unannounced inspection of the Andersons - Reading. The purpose of the inspection was to determine compliance with Permit-to-Install (PTI) #720-81 for a Super B Model S-2400 grain dryer. This facility is a true minor source that is now subject to 40 CFR Part 60 Subpart DD (subpart DD) for grain elevators. I arrived at the facility and with Mr. Jake Drake, Operations Supervisor.

Background

The Reading facility has three grain dryers, the S-2400, a vertical unit, and two tower dryers that were installed around 1999 or 2000. The larger tower unit can dry 3,000 pounds of grain per hour and the smaller unit 900 pounds per hour. The smaller unit is rarely used according to Mr. Drake. All three units meet the Rule 285(2)(p) exemption for needing a permit to install (i.e., they have a column plate perforation of less than 0.094 inches). In 2012, they closed the Jonesville grain elevator and diverted the grain from that location to this elevator in Reading. They have added more silos to handle the increase of grain but have not added anymore dryers. Approximately 75-80% of the grain is shipped out by rail, and 100% of the grain is brought in by truck from local farmers in the tri-state area.

Compliance Evaluation

The Super B Model S-2400 dryer has three special conditions in its permit. During the inspection the dryer was not operating so there were no visible emissions from the dryer (Special Condition (S.C.) No.14. As mentioned above, all of the dryers have column plate perforation with diameters less than or equal to 0.094 inches (SC No 15).

To help control fugitive dust at the facility now the company cleans the cemented area around the silos every night before closing. Any loads that are spilled onto the ground are cleaned up immediately. They also have a company from Litchfield, MI treat all the roads before the harvest season (SC No. 16).

According to Mr. Drake the facility has a capacity of 4,550,800 bushels of grain. The temporary bunker has a capacity of 450,000 bushels, which gives a total permanent bin capacity of 4,100,800 bushels. Since the facility is now over 2.5 million bushels capacity, they are now subject to the Subpart DD.

Compliance Determination

The last time this facility was inspected in 2010, the facility had a permanent bin capacity of 1,913,000 bushels. With the closure of the Jonesville facility in 2012 and the increase in capacity due to the grain being sent to the Reading facility, this facility is now subject to Subpart DD. They will need to do a VE test on the dryers and the grain handling operations and will also have fugitive emission limitations from the unloading stations, the truck loading station, and the grain handling operation. I am going to require the VE test be done during the upcoming harvest season. It is still to be determined if a particulate matter emissions test will be required and on what equipment, if any. I have determined that they are in compliance with their permit, but it is undetermined if they are in compliance with Subpart DD.

NAME

Brian Carley

DATE

9/6/18

SUPERVISOR

[Signature]