# DEPARTMENT OF ENVIRONMENTAL QUALITY AIR QUALITY DIVISION

**ACTIVITY REPORT: Scheduled Inspection** 

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FACILITY: AIRGAS SPECIALTY PRODUCTS		SRN / ID: N5981		
LOCATION: 2271 W DEWEY RD, OWOSSO		DISTRICT: Lansing		
CITY: OWOSSO		COUNTY: SHIAWASSEE		
CONTACT: Russ Zintak , Operations Manager		ACTIVITY DATE: 06/10/2015		
STAFF: Nathaniel Hude	COMPLIANCE STATUS: Pending	SOURCE CLASS: MINOR		
SUBJECT: Scheduled inspection after 5/13/15 attempt. Awaiting evidence of new hoses prior to determining compliance.				
RESOLVED COMPLAINTS:				

Inspection Report

N5981- Airgas Specialty Products 2271 W. Dewey Road, Owosso, Michigan

## Inspection Date:

6/10/15

## **Facility Contacts:**

Russ Zintak, Regional Operations Manager – 708-870-6134, <u>russ.zintak@airgas.com</u> Environmental/Regulatory: Kristina Ortiz

### **MDEQ AQD Personnel:**

Nathan Hude - 517-284-6779, huden@michigan.gov

# Facility Description:

Formerly LaRoche Industries, Airgas Specialty Products is an anhydrous ammonia (AA) storage and distribution facility. The product is not directly distributed to farmers, yet distributed to industry and other distributers. The site is not manned, but rather on call pending customer requirements or product receipt.

The facility is located adjacent to a dilapidated fertilizer facility with a sign the reads "?? Chemicals Inc., ?? of United States Steel Corporation, ??-Fertilizer Materials-Pesticides" in which they share the same driveway off from W. Dewey Road. The dilapidated facility looks to have a semi or heavy truck maintenance garage in operation in one portion of the building. Looking from the Airgas facility, steel tanks can be viewed inside of unknown size, contents, or purpose.

The Airgas facility is fenced at a height of about 6' and topped with 3 strands of barbed wire another 1'. At the entrance there was a sign posted with "After Hours Emergency Contacts" and a sign for "Airgas Emergency Phone Numbers 800-237-8643 and 911". Within the fenced area, there is a garage type maintenance shed, a office type building, and 4 tanks on the property. The tanks are in pairs of two on the south-east side and north-west side of the fenced area. The north-west pair looked newer and were approx. 30 feet long and 8 feet in diameter, "Anhydrous Ammonia" was painted on them both and a windsock was located on the top of the furthest north-west tank. The south-east pair looked older and were approx. 50 feet long and 6 feet in diameter, only one had visible labeling by paint, "Ammonia". There is an old railroad bed that is not operational running south-west to north-east on the east side of the property; incoming shipment of anhydrous ammonia is by semi usually brought in from Canada. Airgas distributes ammonia to industry, not farmers directly.

# **Applicable Regulations:**

- 1. MI-PTI-249-96
- 2. Anhydrous Ammonia Safety and Security Practices (AASSPs) in accordance with Anhydrous Ammonia Security Act, Public Act 417 of 2006
- 3. 6 CFR Part 27 Appendix to Chemical Facility Anti-Terrorism Standards; Final Rule; Chemical of Interest List (for release, tanks > 10,000 lbs)

#### **Key Concerns:**

- 1. No inspection on record for facility since permitting in 1996.
- 2. Inspections will need to be coordinated due to "on-call" operation of facility.

# **Emission Unit Summary Table**

None.

## Inspection Summary

I arrived onsite at 1245 for a scheduled and announced inspection. This was also an initial contact as the facilities new Air Inspector. I did not notice any odors or visual environmental concerns of the Airgas facility.

Ron was already onsite, yet we were waiting for the land owner to arrive with keys for access. After his arrival, we went to the office building. We reviewed the Rights and Responsibilities brochure and some documentation I had regarding ammonia. Ron found all of the required regulations required to be on hand at the site including ANSI K61.1-1999. Maintenance and inspection forms were provided to me as well as a copy of the Emergency Action Plan that had been reviewed by Michael Thonby of the Owosso Township Fire Department on 10/3/2014.

Thereafter we reviewed the special conditions of the permit. Ron pointed out the valves and check valves as cited in the permit. Although the valves were un-reachable due to height, inspection paperwork gave an expiration date of 01-2016. With the hoses we found 1 of the 2 to be outside of the 5 year range as required by the permit. The hoses are marked with an manufacture and expiration date by the manufacturer. I informed Ron that as long as I received documentation of new hoses being on hand prior to July (anticipated next operational date) I would not cite them with a violation.

The site is permitted under a General Permit (294-96). The permit does not list the number of tanks allowed on site or give tank specifics for sizes, National Board Numbers, or Serial Numbers. This information is only found in the permit application packet submitted in 1996 which lists 4 tanks with the National Board Numbers and Serial Numbers.

I found from Ron that the one of the two tanks on the south east side were not used, T1 was used in the past when receiving AA via rail but has not been used in several years. Yet, T1 is an original tank and matches the map on the 1996 permit application with a National Board # 750 and Serial Number 30156 with a capacity of 12,000 gallons.

T2 was not secured to the base and does not match the permit application. According to Ron, T2 is a portable rental tank; National Board # 1922 and Serial Number 23731. I informed Ron that due to its size of 18,000 gallons, whom ever rented the tank would be required to get a permit and that he should advise them of such.

T3 and T4 are on the northwest side and the National Board and Serial numbers both matched the permit application (T3 18,000 gallon, National Board # 54309, Serial Number 3691 and T4 18,000 gallon, National Board # 1543, Serial Number 8775).

Other than the hoses,	I found the site to be in con	npliance with the	permit. I departed	the site at approx.	1400.
NAME ///	D/	ATE <u>6/23/15</u>	SUPERVISOR	6. M.	