

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

N826053699

FACILITY: KREBSVIEW FARMS		SRN / ID: N8260
LOCATION: 8760 MASON RD, FOWLerville		DISTRICT: Lansing
CITY: FOWLerville		COUNTY: LIVINGSTON
CONTACT: Fred Krebs , General Partner		ACTIVITY DATE: 12/20/2019
STAFF: Samantha Davis	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: Unannounced, scheduled inspection of anhydrous ammonia tank.		
RESOLVED COMPLAINTS:		

On December 20, 2019, I conducted an unannounced, scheduled inspection for compliance with General Permit to Install (GPTI) 86-09 for a single anhydrous ammonia storage tank and any associated handling process, nurse tanks or applicator tanks located at Krebsview Farms in Fowlerville. This process has never been inspected.

Facility Name/Address:

Krebsview Farms (N8260)
8760 Mason Rd.
Fowlerville, MI 48836

Facility Contact:

Mr. Fred Krebs, Owner, 517-223-8747, FredKrebs51@yahoo.com

Facility Description:

Krebsview Farms grows corn, beans, and wheat. Anhydrous ammonia is utilized as a fertilizer. The usage of anhydrous ammonia is a seasonal operation. Process consists of one 1 anhydrous ammonia permanent storage tank, filling station for nurse tanks, and nurse tanks for application of anhydrous ammonia.

Krebsview Farms is located South of the town of Fowlerville. The location of the ammonia tank is not at the farmstead, it is at a satellite farm location, therefore; requires Fred or Mark to meet out at the location. For this reason, I would recommend calling ahead for future inspections. The area surrounding the farm is rural and agricultural with some residential housing mixed in. The closest house is south of the permanent storage tank, nurse tank storage, and nurse tank fill loading station.

Regulatory Review:

The facility is a minor source of any regulated air contaminants including hazardous air pollutants (HAPs) and not subject to the Title V Renewable Operating Permit (ROP) program.

Other applicable regulations include the following -

Part 78, Storage and Handling of Anhydrous Ammonia", (MIOsha 1910.111) hereinafter Rule 7801. Michigan Occupational Safety and Health Act (MIOsha) safety standards.

Emergency Response Plan and Risk Management Plan (40 CFR 68)

Inspection:

Arrived: 1:30 pm

No visible emissions (VEs) were observed from the facility upon arrival. No ammonia odors were identified surrounding the facility.

I met Mr. Fred Krebs at the site of the ammonia tank, this is a satellite farm, and there are no residences on site. The purpose of my visit and the status of the facility operations were discussed. The only things located on site are a barn for implement storage, some silos for grain storage, and the anhydrous ammonia tank.

The permanent storage tank was not full and will be re-filled for fall application.

This satellite location appeared to be very neat and the ammonia tank appeared to be upkept in satisfactory manner.

Inspection notes per the Special Conditions (SC) of GPTI 86-09:

Emission Unit ID	Emission Unit Description
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EU-AMMONIA	A single anhydrous ammonia storage tank and any associated handling process, nurse tanks or applicator tanks.
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I. EMISSION LIMITS Not Applicable (N/A)

II. MATERIAL LIMITS N/A

III. PROCESS/OPERATIONAL RESTRICTIONS

1. Except where specific requirements of these special conditions are applicable and more stringent, EU-AMMONIA shall comply with the Department Of Labor and Economic Growth General Industry Safety Standards, Part 78. Storage and Handling of Anhydrous Ammonia – (1910.111) hereinafter Rule 7801. A copy of this document, which may be obtained by contacting the Michigan Occupational Safety and Health Administration, MIOSHA Standards Section, 7150 Harris Drive, P.O. Box 30643, Lansing, MI 48909-8143, shall be maintained for inspection at the facility.

Comments: A copy of this document is kept at the home office.

2. The permittee shall not operate EU-AMMONIA unless the inspection and maintenance program specified in Appendix A has been implemented and maintained.

Comments: Annual inspection and maintenance is performed on storage tank.

3. The permittee shall not operate EU-AMMONIA unless an emergency response plan, to be followed in the event of an emergency, has been approved by the local fire department or county emergency response agency and is implemented and maintained. Prior to each spring season, the permittee shall review this plan with the local fire department or emergency response agency and make any necessary updates.

Comments: An emergency response plan was provided to the local fire department but had not been updated. Mr. Krebs assured me that nothing has changed that would alter the plan but would call the local fire department to make sure they have a up-to-date version in house.

4. EU-AMMONIA shall be located a minimum of 50 feet from the property line, 300 feet from any existing places of residence or private or public assembly, 500 feet from a school, apartment building, or institutional occupancy, and not less than 1000 feet from a hospital or nursing home.

Comments: EU-AMMONIA meets the setback requirements.

5. The permittee shall not operate EU-AMMONIA unless all transfer operations including transport deliveries are performed by a reliable person properly trained and made responsible for proper compliance with all applicable procedures.

Comments: Transfer operations are always overseen by Fred Krebs or his brother.

6. Nurse and applicator tank storage shall be no less than 50 feet from the property line; 150 feet from any existing places of residence or private or public assembly; 250 feet from a school, apartment building, or institutional occupancy; and no less than 1000 feet from a hospital or nursing home.

Comments: During the off-season applicator tanks are not stored on site but are the appropriate set-back.

7. Nurse tank filling shall be done only from a permanent stationary storage tank.

Comments: Any nurse tanks are only filled at the stationary storage tank.

8. Nurse and applicator tanks shall be filled to no more than 85 percent of liquid capacity by volume. Storage tanks may be filled according to temperature density correction tables in Rule 7801(b)(11) where tanks have a thermometer well and suitable level gauge.

Comments: Applicator tanks are filled to the appropriate level to account for temperature and pressure change.

9. Vapor return lines shall be employed whenever necessary to ensure an accidental release from pressure relief valves will not occur during ammonia transfer operations.

Comments: Vapor return lines are utilized during transfers.

10. Nitrogen stabilizer shall not be added to any permanent stationary storage tank or to rail or truck transport tanks.

Comments: Nitrogen stabilizer are not added to stationary storage tank.

IV. DESIGN/EQUIPMENT PARAMETERS

1. All containers shall be fitted with safety relief valves in accordance with Rule 7801(b)(9). Such valves shall be stamped with the date manufactured, and shall be replaced, or re-tested and re-certified, at least every five years or more often if there is evidence of damage or deterioration.

Comments: Safety relief valves are present on the tank and are reviewed for damage or deterioration.

2. The permittee shall not operate EU-AMMONIA unless a remotely operated internal or external positive shut-off valve is installed to allow access for emergency shut-off of all flow from stationary storage containers.

Comments: There is an emergency shut off present at this site in case of emergency.

3. The permittee shall not operate EU-AMMONIA unless a bulkhead, anchorage, or equivalent system is used at each transfer area so that any break resulting from a pull will occur at a predictable location while retaining intact the valves and piping on the plant side of the transfer area.

Comments: There is a break-off coupling on the valve for the tank.

4. The permittee shall not operate EU-AMMONIA unless any liquid lines in rail and transport transfer areas are equipped with back pressure check valves and all liquid lines not requiring a back check valve and all vapor lines are equipped with properly sized excess flow valves. These valves shall be installed on the main container side of the predictable break point at the bulkhead.

Comments: Backflow prevention is in place for this tank.

5. All hoses shall be replaced five years after date of manufacture or more often if there is evidence of damage or deterioration.

Comments: Hoses and fittings are being replaced every five years or as needed.

6. Any vapor or liquid line, exclusive of couplings, requiring venting after ammonia transfer shall be vented through a water trap of 55 gallons minimum size. Safety water shall not be used for this purpose.

Comments: There is a water trap, but was not filled at the time due to off-season.

7. A sign shall be present and conspicuously placed at the facility entrance stating the emergency phone numbers for the owner, primary operator, local and state police, local fire department, and ambulance service.

Comments: Emergency contact information provided in the emergency plan.

V. TESTING/SAMPLING N/A

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years.

1. The permittee shall keep, in a satisfactory manner, records of the date, duration, and description of any malfunction or spill occurring from EU-AMMONIA, including the estimated amount of ammonia released into the atmosphere. Do not include trace amounts from normal hose coupling bleed downs. All records shall be kept on file and made available to the Department upon request.

Comments: There have not been any malfunctions or releases from EU-AMMONIA.

2. The permittee shall keep, in a satisfactory manner, records of the date of annual review and approval of the emergency response plan with the local fire department. All records shall be kept on file and made available to the Department upon request.

Comments: Annual maintenance is performed but has not been being recorded. Mr. Krebs has agreed to maintain these records in the future.

VII. REPORTING

1. The permittee shall notify the Pollution Emergency Alert System (PEAS) 1-800-292-4706 and/or the AQD District Supervisor immediately of any abnormal release of anhydrous ammonia from EU-AMMONIA. A normal release includes only hose coupling bleed downs, operation of hydrostatic relief valves, and normal pressure relief from the safety relief valve(s). Relief due to overfilling is not normal. All records shall be kept on file for a period of at least five years and made available to the Department upon request.

Comments: There have not been any releases of anhydrous ammonia.

VIII. STACK/VENT RESTRICTIONS N/A

IX. OTHER REQUIREMENTS

1. The permittee shall not replace or modify any portion of EU-AMMONIA, nor install new equipment unless all of the following conditions are met:

- a) The permittee shall update the general permit by submitting a new Process Information Form (EQP5731) to the Permit Section and District Supervisor, identifying the existing and new equipment a minimum of 10 days before the replacement, modification, or installation of new equipment.
- b) The permittee shall continue to meet all general permit to install applicability criteria after the replacement, modification or installation of new equipment is complete.
- c) The permittee shall keep records of the date and description of any replacement, modification, or installation of new equipment at the source. All records shall be kept on file for a period of at least five years and made available to the Department upon request.

Comments: There have not been any changes or modifications to the equipment.

Summary:

Due to the cooperation I received from Fred, and the agreement to update the emergency plan with the local fire department and keep records of annual maintenance reviews in the future, a violation will not be issued at this time. I have provided him with the contact information of the Michigan Agriculture Environmental Assurance Program (MAEAP) Technician that covers Livingston County if he needs help with an updated copy of the Emergency Plan. The facility appeared to be in compliance with GPTI 86-09.

NAME Samantha Davis

DATE 5/22/2020

SUPERVISOR B.M.