

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

P030745313

FACILITY: PINCIK FARMS - EDWARD G PINCIK		SRN / ID: P0307
LOCATION: 1405 N KERBY ROAD, CORUNNA		DISTRICT: Lansing
CITY: CORUNNA		COUNTY: SHIAWASSEE
CONTACT: Edward Pincik , Owner		ACTIVITY DATE: 07/24/2018
STAFF: Julie Brunner	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: Compliance inspection of an anhydrous ammonia storage tank and associated equipment on General Permit to Install (GPTI) 3-12.		
RESOLVED COMPLAINTS:		

On July 24, 2018, I conducted an unannounced, scheduled inspection for compliance with General Permit to Install (GPTI) 3-12 for a single anhydrous ammonia storage tank and any associated handling process, nurse tanks or applicator tanks located at Pincik Farms in Corunna. This process has never been inspected.

Facility Name/Address:

Pincik Farms
1405 North Kerby Road
Corunna, Michigan 48817

Facility Contact:

Mr. Edward Pincik, Owner, 989-743-5466, PincikFarms@yahoo.com

Facility Description:

Pincik Farms is 2,000 acres, and grows cash crops such as corn. Anhydrous ammonia is utilized as a fertilizer. The usage of anhydrous ammonia is a seasonal operation with application occurring in the spring and fall with a maximum operating schedule of 10 days per year. The process consists of one (1) 40,000 gallon anhydrous ammonia permanent storage tank, filling station for nurse tanks, and nurse tanks for application of anhydrous ammonia.

Pincik Farms is located northeast of the City of Corunna. The area surrounding the farm is rural and agricultural with some residential housing mixed in. The closest house is east 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)

Michigan Air Emissions Reporting System (MAERS):

The facility is not required to report emission information to MAERS.

Inspection:

Arrived: 9:50 am
Departed: 10:40 am
Weather: 71°F, WNW@4 MPH, UV Index 1 Low, light rain

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

I met Mr. Ed Pincik and his sons Brian and Jordan. The purpose of my visit and the status of the facility operations were discussed. A facility tour was taken to look at the equipment followed by a records review.

The permanent storage tank and the nurse tank loading station (north side of the permanent storage tank) are located northwest of the grain storage. The two (2) nurse tanks (wagons) are stored in a small pole barn directly west of the grain storage. The permanent storage tank was 15% full and will be re-filled for fall application.

Inspection notes per the Special Conditions (SC) of GPTI 3-12:

SC III.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. (R 336.1901)

Notes – A copy of this standard is maintained on file in the farm office.

SC III.2 The permittee shall not operate EU-AMMONIA unless the inspection and maintenance program specified in Appendix A has been implemented and maintained. (R 336.1901)

Notes – The inspections of the ammonia tank are logged (using Appendix A) in the spring and fall as required. Any maintenance performed is noted. Copies of the inspection and maintenance since the start of tank operation in 2012 until Spring 2018 are attached.

SC III.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. (R 336.1901)

Notes – The emergency response plan with all the emergency contact information was reviewed with the local fire department in the spring of 2018 according to Ed. (He was expecting a letter of confirmation from the fire department but never received one.) The Michigan Agricultural Environmental Assurance Program (MAEAP) recognizes that Pincik Farms has an emergency plan, and requires that emergency contact information be posted at the entrance of the farm. A picture of the tube with the emergency information is attached.

SC III.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. (R 336.1901)

Notes – The permanent storage tank and nurse tanks are stored at greater than 700 feet from the nearest residence. Storage of any tank is greater than 50 feet from property boundaries, and there is no school, apartment building, or institutional occupancy close to the property boundaries.

SC III.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. (R 336.1901)

Notes – Only the drivers (of the transport deliveries) load the permanent storage tank because they are trained to do it. Only trained people (Ed is one of them) load the nurse tanks.

SC III.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. (R 336.1901)

Notes – The nurse and applicator tanks are stored at greater than 700 feet from the nearest residence. Storage of any tank is greater than 50 feet from property boundaries, and there is no school, apartment building, or institutional occupancy close to the property boundaries.

SC III.7 Nurse tank filling shall be done only from a permanent stationary storage tank. (R 336.1901)

Notes – The nurse tank loading station is directly (hard wired) connected to the permanent storage tank. Filling of nurse tanks was not occurring during the inspection, but it would be difficult for filling of nurse tanks to occur anywhere else in the yard.

SC III.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. (R 336.1901)

Notes – Ed stated that the tanks are filled to 80%.

SC III.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. (R 336.1901)

Notes – Liquid fill lines are marked in orange and vapor return lines are marked in yellow. The lines are marked to and on the nurse tank filling station.

SC III.10 Nitrogen stabilizer shall not be added to any permanent stationary storage tank or to rail or truck transport tanks. (R 336.1901)

Notes – The nitrogen stabilizer is not added to the permanent storage tank. The stabilizer is injected into the ground at the same time the ammonia is injected from a 50 gallon tank on the applicator equipment.

SC IV.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. (R 336.1225, R 336.1901)

Notes – Safety relief valves are installed. There are three (3) on top of the permanent storage tank. The maintenance records show that the valves were replaced 4-20-2014. There was no evidence of damage or deterioration.

SC IV.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. (R 336.1225, R 336.1901)

Notes – Confirmed that the shut-off valve is installed on the permanent storage tank. It was also well labeled. See pictures of emergency shut-off valve.

SC IV.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. (R 336.1225, R 336.1901)

Notes – Confirmed installed. (See pictures.)

SC IV.4 The permittee shall not operate EU-AMMONIA unless 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. The permittee shall install these valves on the main container side of the predictable break point at the bulkhead. (R 336.1225, R 336.1901)

Notes – Confirmed installed. (See pictures.)

SC IV.5 All hoses shall be replaced five years after date of manufacture or more often if there is evidence of damage or deterioration. (R 336.1225, R 336.1901)

Notes – All hoses were in good shape. They are stamped with the date 2018. The maintenance records show that the hoses were replaced 9-1-2014. (See pictures.)

SC IV.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. (R 336.1225, R 336.1901)

Notes – An approximately 300 gallon tote water trap for vapor bleed off is located by the bulkhead. (See picture.)

SC IV.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. (R 336.1901)

Notes – A tube of emergency information (as required by MAEAP) is located at the front of the facility and posted on the filling station for the permanent storage tank. This is considered in compliance with the SC. (See pictures of signage.)

SC VI.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. (R 336.1201(3))

Notes – According to Ed, there has never been a release.

SC VI.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. (R 336.1201(3))

Notes – Ed was expecting a letter from the fire department after the spring review. I recommended that he develop a review signature page for the emergency response plan so that the dates of the review, approval, and who reviewed it are documented.

SC IX.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: (R 336.1201)

- 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.

Notes – No modifications or installation of new equipment has occurred since the GPTI was issued.

Records:

Copies of records are attached to this activity report.

1. Appendix A – Inspection and Maintenance Program logs

Summary:

The facility appeared to be in compliance with GPTI 3-12. The process was very well run, and documents organized.

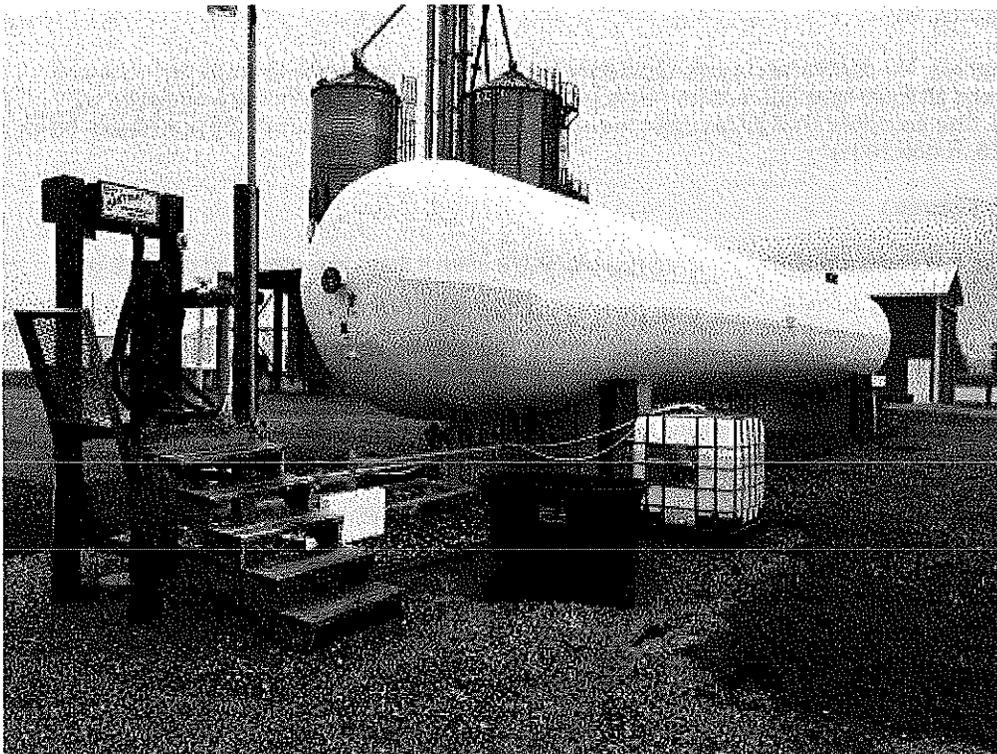


Image 1(001) : Permanent storage tank, nurse tank loading station, and water trap (tote).



Image 2(002) : Nurse tank load out with emergency contacts sign posted.

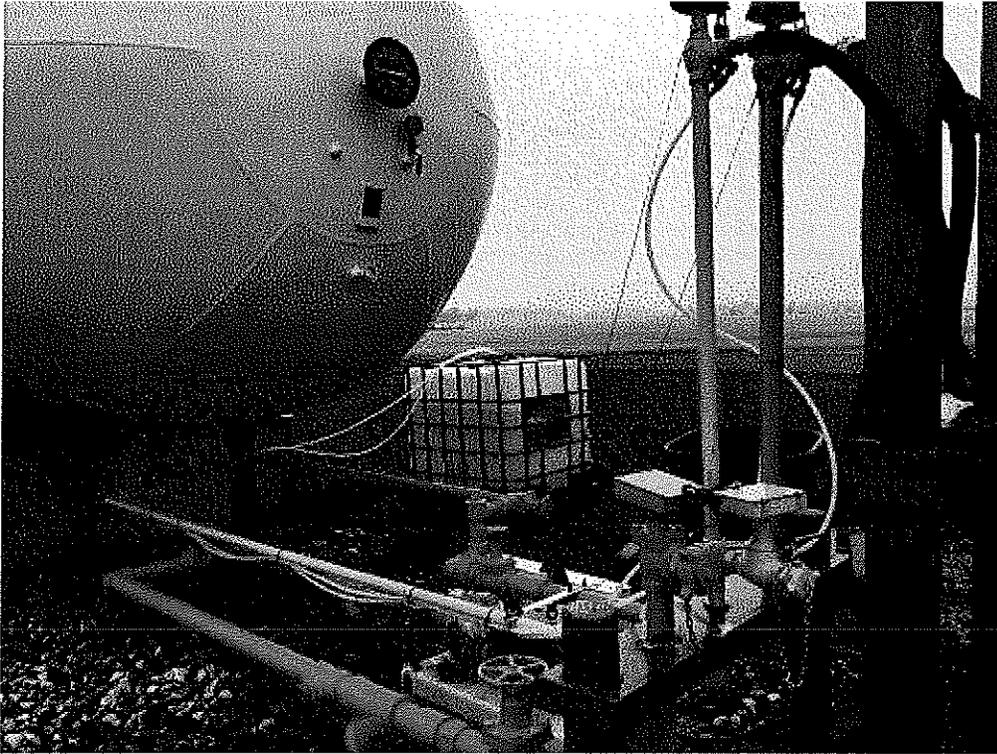


Image 3(003) : Yellow vapor return lines and orange liquid lines with check and flow valves.



Image 4(006) : Emergency shut-off valve.

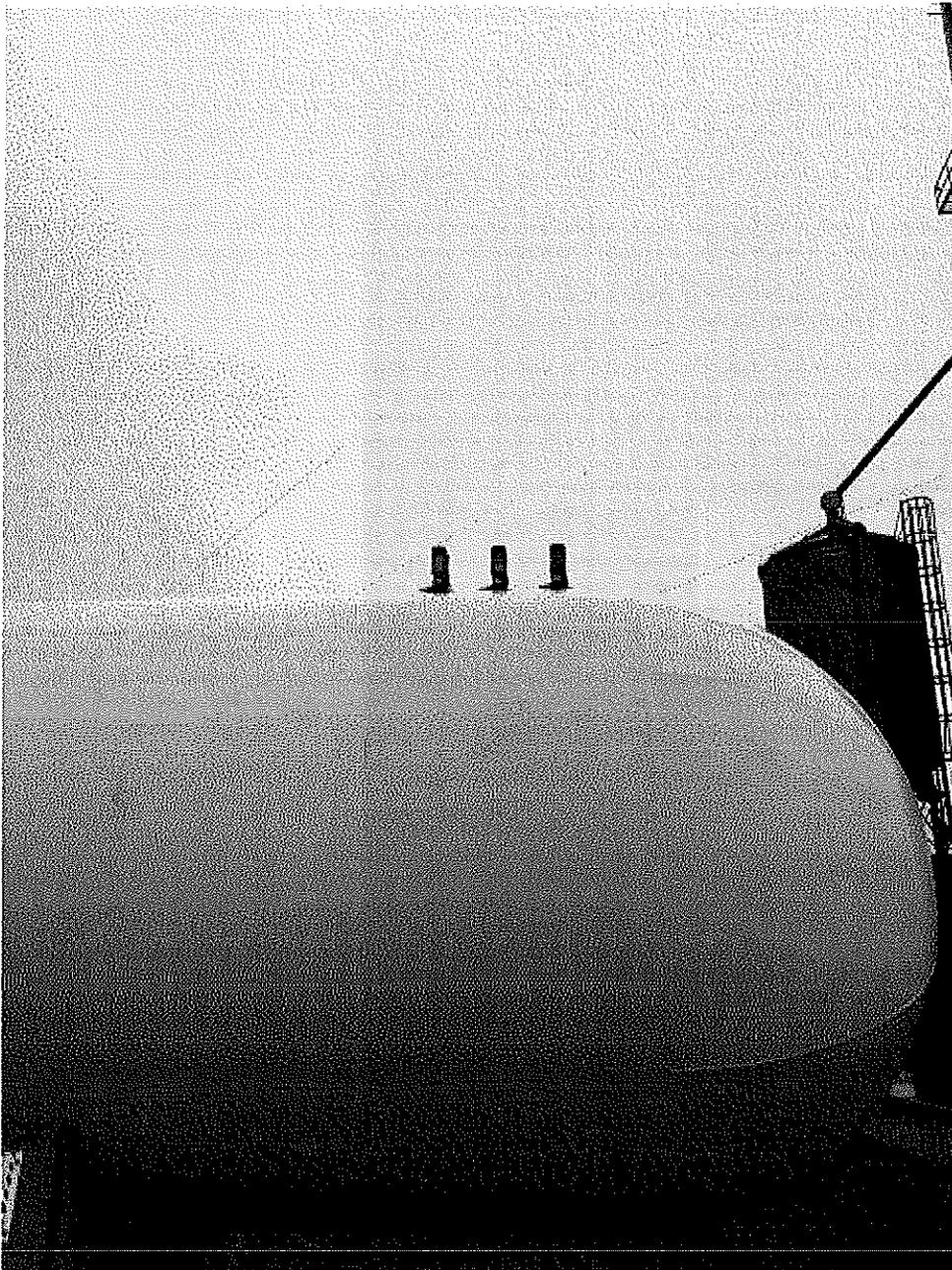


Image 5(007) : Safety relief valves



Image 6(009) : Tube with Emergency Plan posted at the front of the facility.

NAME Julie P. Bann

DATE 7/26/18

SUPERVISOR B.M.

