

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: Self Initiated Inspection

D083730650

FACILITY: CITIZENS ELEVATOR CO		SRN / ID: D0837
LOCATION: 870 S MAIN, VERMONTVILLE		DISTRICT: Lansing
CITY: VERMONTVILLE		COUNTY: EATON
CONTACT: Mark Braeutigam , Manager		ACTIVITY DATE: 08/10/2015
STAFF: Michelle Luplow	COMPLIANCE STATUS: Compliance	SOURCE CLASS: Minor
SUBJECT: Self-initiated compliance inspection to determine NSPS DD applicability.		
RESOLVED COMPLAINTS:		

Inspected by: Michelle Luplow (author) and Sue Thelen (Permit Section Secretary)

Personnel Present: Mark Braeutigam, Manager (mbraeutigam@citizenselevator.com)
Nick Engelsman
Crystal McDonald, Office Manager

Purpose: Conduct an unannounced, self-initiated compliance inspection by determining if Citizens is subject to the NSPS Subparts A and DD, Standards of Performance (NSPS) for Grain Elevators. There are currently no records in MACES that this facility has ever been inspected; however, AQD files indicate that in May 2005 AQD received a complaint of fugitive dust from Citizens' parking lot. Per Permit Cards, this facility does not have an air-use permit at this time.

Facility Background/Regulatory Overview: Citizens Elevator has several facilities throughout Michigan, with the accounting/merchandising office located at 421 N. Cochran Rd in Charlotte; the Vermontville office is the main office. Other facilities include Otto Rd in Charlotte, 1 in Battle Creek, and 1 in Pottersville. The Vermontville Citizens Elevator is a supplier and offers application services of agricultural chemicals. They also process and store round-up grade soybeans, wheat, and corn.

They have multiple liquid storage bins for fertilizers (32% nitrogen and 28% nitrogen fertilizers) and other liquid chemicals such as pesticides and herbicides.

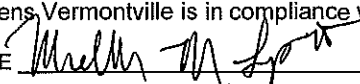
Inspection: This was an unannounced self-initiated compliance inspection. At approximately 9:15 a.m. on August 10, 2015 S. Thelen and I met with Nick Engelsman, who gave us a tour of the facility. I explained to him that currently the facility does not have an air-use permit but that the main reason we were there was to determine NSPS DD subjectivity and to receive a tour of the facility. I provided him with a DEQ "Environmental Inspections: Rights and Responsibilities" brochure, as well as an exemption handbook and my business card, which he passed along to manager, Mark Braeutigam.

There are currently 19 silos, 3 column grain dryers, 2 dump pits and 1 truck loadout area. See attached for elevator layout.

According to the bin capacity record that C. McDonald provided me, the Vermontville elevator has a total permanent storage capacity of approximately 877,848 bushels. In order to trigger 40 CFR 60, New Source Performance Standard DD, a grain elevator must have greater than 2.5 million bushels of permanent storage capacity. At this time, Vermontville Citizens Elevator is not subject to NSPS DD. If Citizens Vermontville ever exceeded 2.5 million bushels of permanent storage capacity, they would become subject to NSPS DD and automatically have to report to MAERS.

During the inspection we watched a truck getting loaded out with corn. The opacity from this process was 80% - 100% opacity. At that time I was a certified Method 9 reader. N. Engelsman said that a truck loadout takes about 20 minutes. I did not conduct a Method 9 reading at that time, but informed N. Engelsman that this would be a violation of the 20% opacity standard. I also met with M. Braeutigam at the end of the inspection and explained to him what a Method 9 reading was, what the standard for opacity was, and that loading out corn for 20 minutes at 80-100% opacity would be considered a violation if a Method 9 had been conducted. I told him that while I wouldn't send a violation notice, especially because we haven't had any complaints of dust from the facility other than road dust, I do expect that Citizens Elevator look into controlling their dust via oil application, decreasing the drop distance from the loadout spout to the truck or some other form of dust control. He explained to me that the quality of the corn is what causes there to be excessive dust and did not believe that dust control would be a financially viable option. Residences are approximately 250' away from the truck loadout area. I will follow up with N. Engelsman in the future to see what measure have been taken to control dust, in addition to driving past the facility when I am in the area.

Citizens Vermontville is in compliance with all applicable state and federal regulations at this time.

NAME  DATE 9-30-15 SUPERVISOR 