

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

M364423696

FACILITY: Hoffman Ag Service, Ltd.		SRN / ID: M3644
LOCATION: 21521 E MICHIGAN AVE, MARSHALL		DISTRICT: Kalamazoo
CITY: MARSHALL		COUNTY: CALHOUN
CONTACT: Duane Hoffman, Owner		ACTIVITY DATE: 11/13/2013
STAFF: Rex Lane	COMPLIANCE STATUS: Compliance	SOURCE CLASS:
SUBJECT: Self-Initiated Inspection		
RESOLVED COMPLAINTS:		

On November 13, 2013, Air Quality Division (AQD) staff (Rex Lane) arrived at Hoffman Ag Services, Ltd. (HASL) which was formerly known as Dale Hoffman & Sons located at 21521 East Michigan Avenue, Marshall, Michigan at 2:45 p.m. to conduct an unannounced air quality inspection. The facility was last inspected by the AQD in December 2001 and was determined to be compliant at that time.

Upon arrival, staff noted that there were several trucks waiting in the unpaved parking area to use the weigh scale on the north side of the office building. Staff made contact in the office with Mr. Duane Hoffman and stated that they would like to conduct an air quality inspection of the facility. Mr. Hoffman said that the office manager had gone home ill and he was running the scale and grain moisture receipts by himself and asked if staff could come back at a later date. Staff stated that the AQD usually performs unannounced inspections and that they would only need 15 - 20 minutes of his time and would work around his customers entering the office. Mr. Hoffman consented and staff provided him with their inspector credentials, a business card and a copy of MDEQ's Environmental Inspections brochure.

According to the 2001 AQD inspection, the facility had four grain storage units and one storage barn for a total grain storage capacity of 225,000 bushels. The facility also had two Meyer 1400 tower grain dryers that were installed in 1997 and 1999. As time permitted, staff asked Mr. Hoffman if there were any changes in their operation since 2001. Mr. Hoffman said that all the equipment from the previous inspection is still there and the only change is that two 140,000 bushel grain storage units were installed in 2010. Staff then showed Mr. Hoffman an aerial picture of the facility and asked about the westernmost outbuilding. He said that the building is used to store bagged seed corn and the seven seed bins on the west side are used to store seed beans. According to Mr. Hoffman, beans are stored in bins rather than bags because the planting rate per acre is four times higher for beans (2 bag equivalents/acre) versus corn.

Staff asked if the facility had any boilers or emergency generators. Mr. Hoffman said that there are some small gas fired space heaters and one generator that is a portable unit. The space heaters would be exempt from air use permitting requirements under Rule 282(b)(i). Because the generator is a portable unit, it is exempt from applicable federal NSPS and/or MACT standards that apply only to stationary emergency generators.

Rule 285(p) exempts grain column dryers that have a plate perforation of not more than 0.094 inch from air use permitting requirements. According to information staff obtained from the dryer manufacturer's web site (attached), the wall screens are standard 0.094-inch perforation stainless steel outside therefore the grain tower dryers meet the Rule 285(p) exemption requirements. The grain and seed bean storage units are also exempt from air use permitting requirements under Rule 285(p).

Staff thanked Mr. Hoffman for his time and asked for permission to look at the grain dryers and storage bin area. Staff observed that both grain tower dryers were in operation and noted that there was a slight amount of bees wings coming out of the dryer exhaust and that there was also some accumulating on the outside portion of the screens on the upper sections of the tower dryers. Staff left the facility at 3:10 pm.

The current total grain storage capacity of the facility is 505,000 bushels. As long as the permanent grain storage capacity remains below 2.5 million bushels, the facility will be exempt from regulation under the federal Standards of Performance for Grain Elevators, 40 CFR Part 60, Subpart DD.

At the time of the inspection, the facility appeared to be in compliance with all state and federal air quality regulations. -RIL

NAME Rex J. Lane

DATE 11/26/13

SUPERVISOR MA 11/26/2013