

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

M380725009

FACILITY: COOPERATIVE ELEVATOR CO - BAD AXE		SRN / ID: M3807
LOCATION: 210 THOMPSON ROAD, BAD AXE		DISTRICT: Saginaw Bay
CITY: BAD AXE		COUNTY: HURON
CONTACT: Burt Eichler , Safety Director		ACTIVITY DATE: 04/09/2014
STAFF: Richard Osentoski	COMPLIANCE STATUS: Compliance	SOURCE CLASS:
SUBJECT: Self initiated inspection of Bad Axe, MI anhydrous ammonia facility.		
RESOLVED COMPLAINTS:		

On April 9, 2014 Rich Osentoski from Saginaw Bay District (AQD) performed a self-initiated inspection of Cooperative Elevator Co. Bad Axe Anhydrous Ammonia Facility located at 210 Thompson Road, Bad Axe, MI 48755, facility SRN is M3807 with a PTIs #135-13 & 136-13. Upon 9 AM arrival at the facility, R. Osentoski met with Burt Eichler (Company Safety Director), Dutch Seley (Bad Axe Plant Manager) and John Boland (Yard Manager). R. Osentoski provided AQD ENVIRONMENTAL INSPECTION Brochures to Mr. Eichler & Mr. Seley, inspection process, rights/responsibilities were explained and discussed.

Required signage was posted at facility entrance with emergency phone numbers for facility contact, local & state police, local fire department and ambulance service.

Following greetings and introductions AQD Staff reviewed required records with (Bad Axe Plant Manager) Dutch Seley, (Cooperative Elevator Safety Director & Coordinator) Burt Eichler Yardman John Boland in office meeting room prior to inspection of the anhydrous ammonia plant facility. Current General Permit M3807, PTIs #135-13 & 136 was available onsite for review, current Risk Management Plan (RMP) is on file; plan will be reviewed and updated onsite with fire department, police and other emergency responders on May 6 2014. Annual safety training is provided to all staff or as needed. Training and certification records for all employees are maintained and available for review in safety/training notebook. Anhydrous Ammonia safety meeting is conducted annually in the spring for employees associated with the facility. Topics covered are safe operation of the facility, correct respirator use, emergency shutoff controls, water tank maintenance and locations. Demonstration and discussion of correct/safe operating procedures when transferring product from delivery trucks to storage tanks and from storage tanks to nurse tanks. Current and previous year's records were reviewed, all were found to be in compliance.

Plant Manager uses 3 ring notebooks to maintain records for all the anhydrous ammonia plant components, devices and nurse tanks. AQD staff reviewed the detailed records of inspection dates and repairs to facility storage tanks and associated components/devices. Current records show manufacture or recertification dates of hoses, safety and pressure relief valves for storage and nurse tanks. The 40 nurse tank pressure relief and pop off valves are/will be in compliance after inspections prior to 2014 use of equipment. Storage tank(s) pressure relief valves are in compliance. Plant Manager uses Appendix A Inspection and Maintenance checklists for the two storage tanks during spring inspections. Plant Manager has made up his own maintenance/inspection worksheets for the nurse tanks. Notebook with worksheets have tank ID # with inspection and valve replacement history for each tank, use of these worksheets will continue.

As Cooperative Elevator and AQD staff walked from the office to the anhydrous ammonia plant located South of office, behind fertilizer storage and blending buildings. Rfo observed grounds, liquid fertilizer/nitrogen storage tanks, dry fertilizer storage and blending structures are well maintained and in good repair.

A well maintained anhydrous ammonia storage and nurse tank filling site has (2) 18,000 gallon (water capacity) tanks set parallel to each other with dual nurse tank loading riser located west side of and parallel with the storage tanks. Mechanical cable system is attached to emergency shutoff valve, can be activated from various remote locations around the storage tanks including product receiving station. Burt/Dutch pointed out 150 gal safety water tank that will be filled and positioned near nurse tank riser platforms, observed piping is aboveground. AQD Staff observed guard rails protect pumping equipment and other devices used to fill storage and nurse tanks. Anhydrous ammonia receiving station emergency shutoff cable is accessible; bleed off water barrel trap will be brought from storage when needed. Pressure relief valves are located on top of each storage tank, LPG Service & Leasing, LLC is contracted

to service all pressure relief and emergency shut off valves when required. Supporting invoice for new emergency shut off valve and cable system installed in fall of 2013 was observed.

AQD Staff observed manufacture dates on safety valves/devices located on storage tanks, at receiving station and nurse tank loading station risers. In addition to the fixed storage tanks 40 1,000 gal nurse tanks are maintained for customers to transport and apply the nitrogen to their corn crop fields. Application tool bars and hoses are owned and maintained by both farmers and Cooperative Elevator. The nurse tanks and wagons are inspected prior to leaving facility with each new load of product, inspection results are recorded.

The facility reports no malfunction or spill event with release to the atmosphere during years owned and operated by Cooperative Elevator Co. Theft of anhydrous ammonia has not occurred from this facility, when each nurse tank is filled a plastic tie is used to secure each fill valve, this helps to ensure no theft has occurred. If theft was to occur a product dye is available to add to the ammonia which would quickly mark and identify thief with permanent marker. The facility is located approximately 1/2 mile South of Bad Axe City Limits, is modern and well maintained. The facility is has chain link fence & gate along 210 Thompson Road, is well lite at night, entrance gate is locked when facility is closed; police do occasional checks for suspicious activity when business is closed.

R. Osentoski found the facility to be well managed with required records complete, up to date and maintained in separate notebooks in main office along with General Operating Permit. AQD inspection findings were discussed with Safety Director and Plant Manager prior to leaving the facility.

AQD Staff has determined this Cooperative Elevator Co. Bad Axe, MI anhydrous ammonia facility to be in full compliance. Cooperative Elevator Co. Safety Director Burt Eichler is to receive a copy of this report, his E-mail: burt.eichler@coopelev.com , Cell: (989) 550-8919.

RFO, 4/25/2014

NAME Richard Osentoski

DATE 4/28/2014

SUPERVISOR C. Kere