

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

N395637953

FACILITY: RIVERDALE FEED & GRAIN		SRN / ID: N3956
LOCATION: 6658 MILL ST, RIVERDALE		DISTRICT: Lansing
CITY: RIVERDALE		COUNTY: GRATIOT
CONTACT: Jeff Meyer , Manager		ACTIVITY DATE: 12/14/2016
STAFF: Michelle Luplow	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: Scheduled, unannounced inspection to determine compliance with PTI No. 21-92.		
RESOLVED COMPLAINTS:		

Inspected by: Michelle Luplow
Personnel Present: Jeff Meyer, Manager (2174@ispmgt.com)

Purpose: Conduct an unannounced, scheduled compliance inspection by determining compliance with Riverdale Feed & Grains' Permits to Install (PTI) No. 21-92 for an animal feed mixing operation, including a grinder controlled by a cyclone, 3 mixers, a weigh hopper and up to 12 ingredient storage bins. There is no documentation in MACES or in Lansing District's paper files that this facility had ever been inspected.

Facility Background/Regulatory Overview: J. Meyer said that Riverdale Feed & Grain (Riverdale) manufactures cattle feed. They receive pre-dried corn and soybean meal which they store in silos. No drying operations are conducted at this site. Corn, soybean meal, and wheat are then blended and made into pellets. There is 1 truck loadout area and 1 truck receiving area.

Prior to this inspection I had attempted to conduct an inspection on August 18, 2016, but J. Meyer was not present. I had left a PTI Exemption Handbook, my card, and a Boiler MACT outreach card with the office staff for J. Meyer upon his return.

Inspection: This was an unannounced scheduled compliance inspection. At approximately 11 a.m. on December 14, 2016 I met with J. Meyer, Manager.

PTI No. 21-92: Animal Feed Mixing Operation, Grinder with cyclone, 3 mixers, weigh hopper, 12 ingredient storage bins

Table 1 shows the animal feed equipment that is currently onsite with respect to what was originally permitted in PTI 21-92.

Table 1. Animal Feed Mixing Operation Equipment

<u>EU</u>	<u>Description</u>	<u>PTI/Exemption</u>
Grinder (mill) controlled with cyclone	A grinder is present, but the emissions from the grinder are no longer exhausted to the ambient air.	21-92
Three mixers	Only 1 mixer is present	21-92/Rule 285(e) Mixer has baghouse control installed, see discussion below
Weigh hopper	There is one weigh hopper present	21-92/Rule 285(e) Hopper has baghouse control installed, see discussion below
12 ingredient storage bins	There are currently 4 mineral/ingredient storage bins	21-92

NA	18 grain storage bins	Exemption Rule 285(p) – storage of grain

There are 2 requirements under this permit: Visible emissions from any of the permitted equipment cannot exceed 20% opacity, and the grinder must have a cyclone that is installed and operating properly.

I saw no signs of opacity from the facility during the inspection.

The grinder no longer has vented emissions to the ambient air, but the emissions are recycled back into their processing for use, and therefore the cyclone is no longer necessary.

J. Meyer said that in the summer of 2016 they installed a baghouse to duct emissions from the weigh hopper and mixer (see attached photos). Particulate is collected in a drum below the baghouses. The vented mixer and weigh hopper are exempt from a permit to install per exemption Rule 285(dd)(iii).

Cleaver Brooks Boiler

J. Meyer informed me that a Cleaver Brooks natural gas-fired boiler was installed at Riverdale in 2011. The unit was installed as Riverdale entered a new business venture: producing cattle feed pellets. The steam produced from this boiler comes into direct contact with the corn/soybean meal mixture before it is extruded into pellets. The Cleaver Brooks boiler, Model CB-700-040-150ST, Serial Number T2077-1-1 is rated at 1.67 MMBtu/hr, and would be exempt from the requirement to obtain a permit to install under Rule 282(b)(i), as it is natural gas-fired and under 50 MMBtu/hr; however, the steam produced from the unit comes into direct contact with the feed meal to produce the animal feed pellets. Direct heating is outside the scope of exemption Rule 282(b)(i) and therefore Riverdale will have to obtain a permit to install for this unit. I will not cite a violation at this time but will ask that they submit the permit to install application by January 30, 2017.

This unit is only capable of burning natural-gas. The boiler is exempt from the Boiler MACT JJJJJJ for area sources because it is a natural gas-fired boiler (as determined using the Boiler MACT online tool provided in the brochure: www.deq.state.mi.us/eforms/BoilerTool/quiz.html).

J. Meyer said the boiler is annually inspected by Dean Boiler, to ensure proper operation. He also said that MDLARA's David Evans, inspects the boiler, with the most recent inspection on November 16, 2016.

At this time Riverdale is in compliance with their permit. I will make J. Meyer aware of the need to apply for a permit to install for the boiler. Failure to apply for a permit within the specified time period may result in a violation of Rule 201 for failure to obtain a permit to install prior to installation.

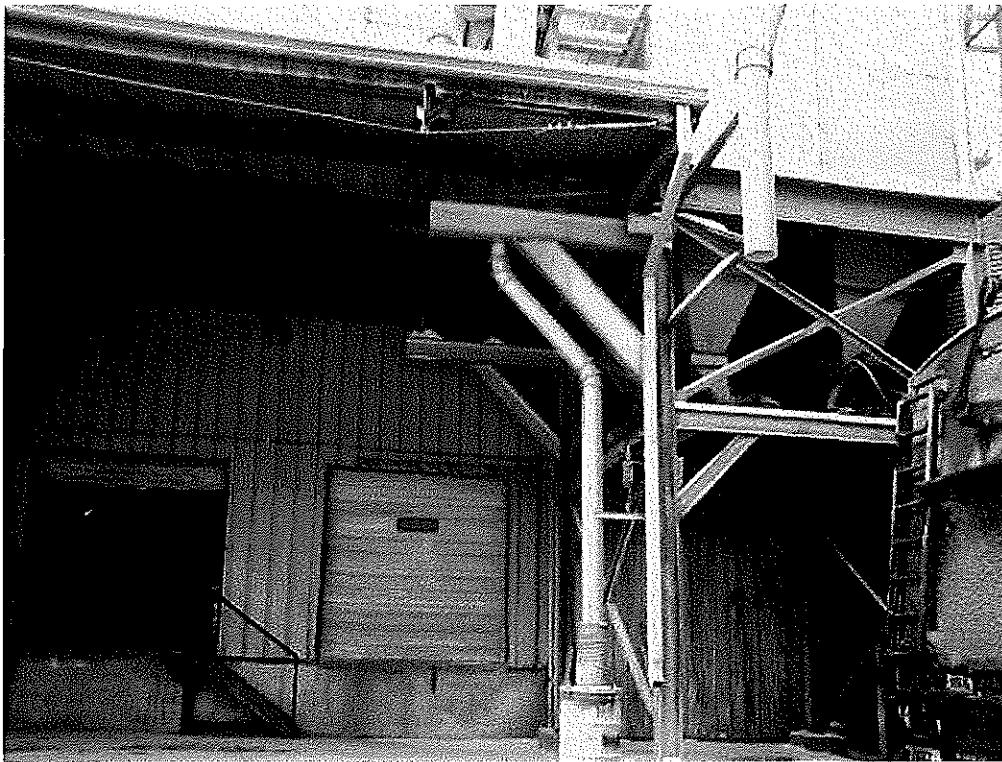


Image 1(Riverdale Baghouse) : Baghouse with collection system for particulate off of mixer and weigh hopper

NAME M. Lynn

DATE 1-13-17

SUPERVISOR B. M.

