

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

N598129409

FACILITY: AIRGAS SPECIALTY PRODUCTS		SRN / ID: N5981
LOCATION: 2271 W DEWEY RD, OWOSSO		DISTRICT: Lansing
CITY: OWOSSO		COUNTY: SHIAWASSEE
CONTACT: Russ Zintak , Operations Manager		ACTIVITY DATE: 05/13/2015
STAFF: Nathaniel Hude	COMPLIANCE STATUS: Unknown	SOURCE CLASS: MINOR
SUBJECT: First site inspection, unannounced, initial contact to determine compliance with Michigan Rules, AASSPs, and Risk Management Plan requirements.		
RESOLVED COMPLAINTS:		

Inspection Report

N5981- Airgas Specialty Products
2271 W. Dewey Road, Owosso, Michigan

Inspection Date:

5/13/15

Facility Contacts:

Operations: Russ Zintak – 708-870-6134, russ.zintak@airgas.com
Environmental/Regulatory: Kristina Ortiz

MDEQ AQD Personnel:

Nathan Hude – 517-284-6779, huden@michigan.gov

Facility Description:

Formerly LaRoche Industries, Airgas Specialty Products is an agriculture anhydrous ammonia storage and distribution facility. The site is not manned, but rather on call pending customer requirements or product receipt.

The facility is located adjacent to a dilapidated fertilizer facility with a sign the reads “?? Chemicals Inc., ?? of United States Steel Corporation, ??-Fertilizer Materials-Pesticides” in which they share the same driveway off from W. Dewey Road. The dilapidated facility looks to have a semi or heavy truck maintenance garage in operation in one portion of the building. Looking from the Airgas facility, steel tanks can be viewed inside of unknown size, contents, or purpose.

The Airgas facility is fenced at a height of about 6’ and topped with 3 strands of barbed wire another 1’. At the entrance there was a sign posted with “After Hours Emergency Contacts” and a sign for “Airgas Emergency Phone Numbers 800-237-8643 and 911”. Within the fenced area, there is a garage type maintenance shed, a office type building, and 4 tanks on the property. The tanks are in pairs of two on the south-east side and north-west side of the fenced area. The north-west pair looked newer and were approx. 30 feet long and 8 feet in diameter, “Anhydrous Ammonia” was painted on them both and a windsock was located on the top of the furthest north-west tank. The south-east pair looked older and were approx. 50 feet long and 6 feet in diameter, only one had visible labeling by paint, “Ammonia”. There is an old railroad bed that is not operational running south-west to north-east on the east side of the property; it is assumed that incoming shipment of anhydrous ammonia is by semi.

Applicable Regulations:

1. MI-PTI-249-96 (unknown on date of inspection, found upon return to office)
2. Anhydrous Ammonia Safety and Security Practices (AASSPs) in accordance with Anhydrous Ammonia Security Act, Public Act 417 of 2006
3. 6 CFR Part 27 Appendix to Chemical Facility Anti-Terrorism Standards; Final Rule; Chemical of Interest List (for release, tanks > 10,000 lbs)

Key Concerns:

1. No inspection on record for facility since permitting in 1996.
2. Unknown compliance with regulations and permit due to inability to access.
3. Inspections will need to be coordinated due to “on-call” operation of facility.

Emission Unit Summary Table

None.

Inspection Summary

I arrived onsite at 0800 for an internally scheduled yet unannounced inspection. This was also an initial contact as the facilities new Air Inspector. I did not notice any odors or visual environmental concerns of the Airgas facility. At the time, I was unaware that the facility had a General Permit, (I later found it was issued 294-96 upon returning to the office on 5/14/15).

The gate was locked and there was no evidence of personnel onsite. I took notes of the facility and pictures of the fencing, signage, tanks, and overall layout. I also took a picture of the adjacent building. All notes and descriptions are listed above in the "facility Description" section.

I attempted to contact personnel as listed on the "After Hours Emergency Contacts" sign posted on the gate. I started with calling the listed "Facility Manager- Scott Buck at 989-217-0323" and received his voicemail. I left a message informing him of the purpose of the call and requesting he call me back on my personal cell phone. I then call the next number "Operations, Russ Zintak at 708-870-6134". Russ answered and I informed him of the purpose of my call. He stated that the facility operated on a "on call status", Scott Buck was no longer with the company and that he was in South Carolina for a meeting/conference. When I asked him if the site had a permit for the tanks, he stated he was unaware if the site had a permit. I informed him that due to the size of their tanks (>500 gallons), a permit would be required for the facility by Michigan rules. Due to his location and the complexity of the discussion, he gave me his e-mail address so that I could contact and coordinate a inspection for determining compliance. He also stated that Kristina Ortiz was their Environmental/Regulator contact but did not provide contact information.

I departed the site at 0835.

Upon returning to the office on 5/13/15, I emailed Russ the following:

Russ,

While looking at your facility through the fence, it looks like a permit is required for the site. We have exemptions for tanks of 500 gallons or less, but anything over that amount requires a General Permit, possibly one permit per tank depending on storage size.

40CFR68 also requires a risk management plan (RMP) and compliance with federal chemical facility security standards.

I realize you are out of town for a conference and may not be able to gather everything, but when you get a chance please send me the following information.

1. Each tank storage capacity in gallons.
2. Tank serial numbers, with site orientation.
3. A copy of the RMP.

We'll have to get the ball rolling on the permit asap and I can help you in accomplishing the task.

I'll also need to coordinate a date/time to meet someone out at the facility to inspect the tanks.

I plan to be in the office the remainder of the week and all of next week. Feel free to call me at the below number if you have any questions.

The following day, I found that the site does have a permit, 294-96 issued under "LaRoche Industries". I responded to my previously sent email with the following:

Russ,

After further digging, I found that your site does have a permit. PTI 294-96 dated September 13, 1996 under LaRoche Industries.

I do not know for sure, but we may have to upgrade this for new rules and regulations based on Meth and DHS concerns. I will check with our permit staff and let you know what I find out.

While searching the permit file, I found that the facility was existing at the time of permitting ("The facility has been there ~30yrs; the last tank was installed more than 12 years ago").

The permit application listed the following information on the tanks (pressure vessels):

T-1: 12,000 Gallons, Built 1963, Serial # 30156

T-2: 18,000 Gallons, Built 1968, Serial # 54322

T-3: 18,000 Gallons, Built 1968, Serial # 54309

T-4: 18,000 Gallons, Built 1958, Serial # 8775

A map of the site was also included, yet it is unclear which tank is which on the key.

I also found that notification of the name change and assumption of permit 294-96 via letter was provided to the permit section on July 15, 2005 signed by Michael H. Jones, Airgas Safety Director.

As of the time of writing this report on 5/14/15 at 1200, I have not received a response from Russ.

Further inspection activities will be coordinated and documented in a separate activity report.



Image 1(Adjacent Facility) : Dilapidated Adjacent Facility

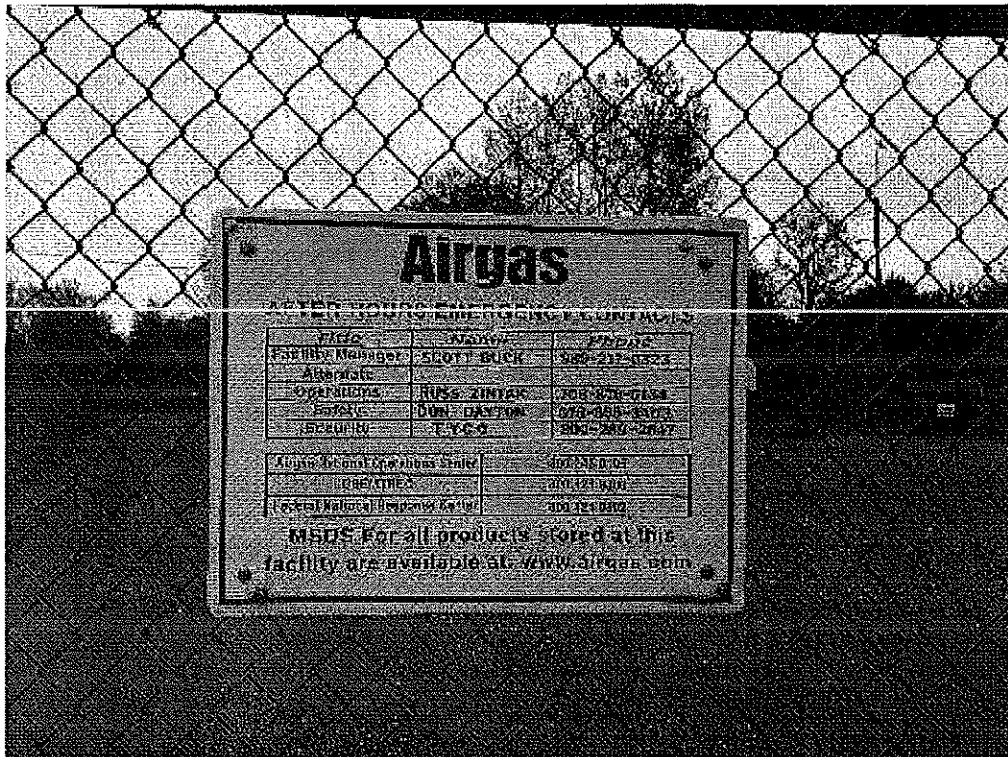


Image 2(After Hours Emergenc) : After Hours Emergency Contacts

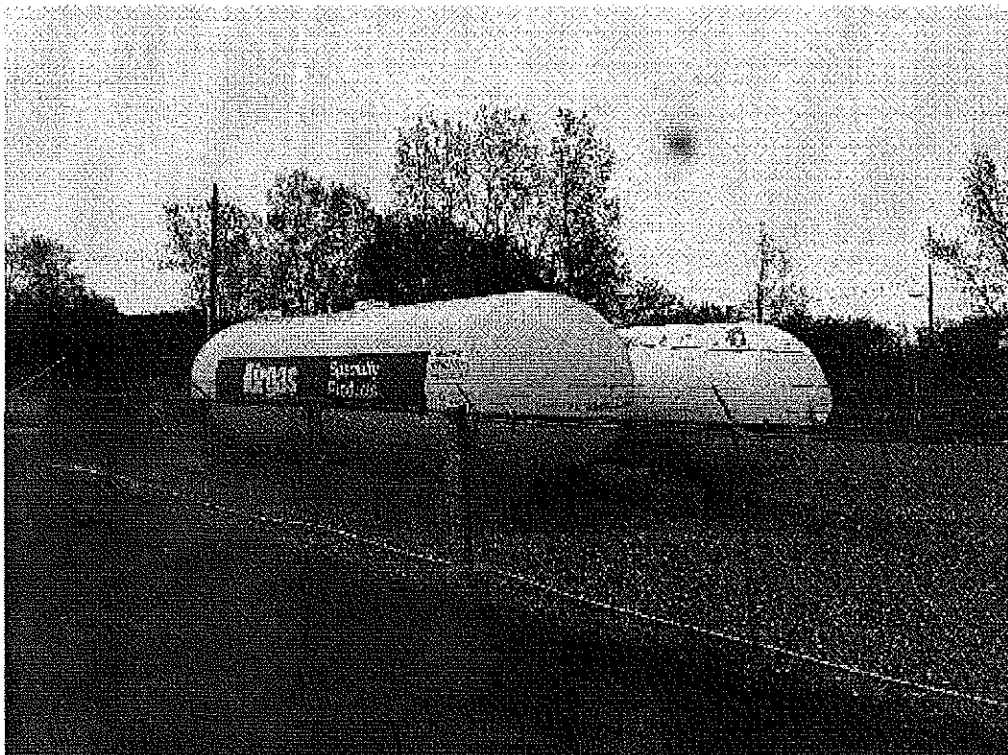


Image 3(NW Tanks) : North-west Tanks



Image 4(SE Tanks) : South-east Tanks

NAME *A. Hill*

DATE 5/15/15

SUPERVISOR *B.M.*

