

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

N598141308

FACILITY: AIRGAS SPECIALTY PRODUCTS		SRN / ID: N5981
LOCATION: 2271 W DEWEY RD, OWOSSO		DISTRICT: Lansing
CITY: OWOSSO		COUNTY: SHIAWASSEE
CONTACT: Mike Jones , Northern Regional Operation Manager		ACTIVITY DATE: 08/30/2017
STAFF: Julie Brunner	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: Compliance Inspection for PTI 249-96		
RESOLVED COMPLAINTS:		

On August 30, 2017, I conducted an inspection of Airgas Specialty Products (N5981) in Owosso for compliance with Permit to Install (PTI) 249-96.

Facility Name/Address:

Airgas Specialty Products (ASP)
2271 W. Dewey Road, Owosso, Michigan

Facility Contacts:

Mr. Mike Jones, Regional Operations Manager, 708-846-6279, mike.jones4@airgas.com
Mr. Rodney Shaydik, Lead Driver for Airgas Specialty Products, 989-217-0323, Rodney.Shaydik@airgas.com

Last AQD Inspection Date: 6/10/15

Inspections need to be coordinated with the Regional Operations Manager out of Chicago due to the "on-call" operation of facility.

Facility Description:

Formerly LaRoche Industries, Airgas Specialty Products is an anhydrous ammonia storage and distribution facility. The product is not directly distributed to farmers, yet distributed to industry and other distributors. 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 sharing a 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. The area surrounding the facility is mainly rural with some residential housing mixed in.

Staff #: 2 Days of Operation: Typically, deliveries are made 5 days a week

List of Active Air Use Permits:

PTI No. 249-96 for four (4) ammonia storage tanks.
Tank 1 – 12,000 gallon, Delta Southern Co., built 1963, Serial No. 30156 (Not in use)
Tank 2 – 18,000 gallon, Flint Steel Corp., built 1968, Serial No. 54322 (Not in use)
Tank 3 – 18,000 gallon, Flint Steel Corp., built 1968, Serial No. 54309
Tank 4 – 18,000 gallon, R.D. Cole Mfg. Co., built 1958, Serial No. 8775

Applicable Regulations:

The facility is a minor source of any regulated air contaminants including hazardous air pollutants (HAPs) and not subject to the Title V Renewable Operating Permit (ROP) program.

Anhydrous Ammonia Safety and Security Practices (AASSPs) in accordance with Anhydrous Ammonia Security Act, Public Act 417 of 2006

6 CFR Part 27 Appendix to Chemical Facility Anti-Terrorism Standards; Final Rule; Chemical of Interest List (for release, tanks > 10,000 lbs)

Part 78, Storage and Handling of Anhydrous Ammonia", (MIOSHA 1910.111) hereinafter Rule 7801. Michigan Occupational Safety and Health Act (MIOSHA)
Emergency Response Plan and Risk Management Plan (40 CFR 68)

Anhydrous ammonia information can be found at: http://www.michigan.gov/deq/0,4561,7-135-3310_70317-235143--,00.html

Michigan Air Emissions Reporting System (MAERS):

The facility is not required to report emission information to MAERS.

Inspection:

Arrived: 9:15 AM

Departed: 10:45 AM

Weather: 62°F, S @ 2 MPH, UV Index 1 Low

No visible emissions (VEs) were observed from the facility upon arrival. No ammonia odors were identified surrounding the facility.

The Airgas facility is fenced in with a chain link fence topped with barbed wire. On the entrance gate, there was a sign posted with "After Hours Emergency Contacts". Beside the entrance gate is a sign for "Airgas Emergency Phone Numbers 800-237-8643 and 911". Within the fenced area, there is a garage type maintenance shed, an office type building, and four (4) tanks on the property. I met Mr. Rodney Shaydik in the office. The purpose of my visit and the status of the facility operations were discussed.

The ammonia tanks are in pairs of two on the south-east side and north-west side of the fenced area and each pair is also fenced in. The north-west pair (Tanks 3 and 4) are in service. Tank 3 was 35% full and Tank 4 was currently empty. Anhydrous Ammonia was painted on them and a windsock was located on the top of the furthest north-west tank (Tank 4). The south-east pair (Tanks 1 and 2) are not in service. There is an old railroad bed on the east side of the property and these tanks were used when ammonia was shipped via rail. Nowadays, shipment of anhydrous ammonia is by semi usually brought in from Canada. Rodney was unsure of the plans for Tanks 1 and 2.

The facility is an all year-round operation not seasonal. The busiest times are, however, in the summer for ammonia deliveries.

PTI 249-96 - Special Conditions

13. Except where specific requirements of these supplemental conditions are applicable and more stringent, the anhydrous ammonia storage and handling facilities shall conform to the American National Standard, Safety Requirements for the Storage and Handling of Anhydrous Ammonia, ANSI K61.1-1989 (except for paragraph 5.3.1 and Table 3). A copy of this standard shall be maintained for inspection at the facility.

Notes – An up-to-date copy of this standard is available to facility staff.

14. Applicant shall not operate the facility unless an inspection and maintenance program, as approved by the District Supervisor, is in use.

Notes – The inspection and maintenance program is all online with notifications done electronically. Copies of the Monthly Inspection Program logs were obtained. They show valve and safety equipment checks, and documents any maintenance. Field services are out of Chicago for maintenance.

15. All containers shall be fitted with safety relief valves as required by the ANSI standard. Such valves shall be stamped with the date manufactured, and shall be replaced, or retested and recertified, at least every five years or more often if there is evidence of damage or deterioration. Safety relief valves on the stationary storage container shall be installed in a manifold meeting ANSI requirements.

Notes – Safety relief valves were changed in May of 2015. The monthly inspection report lists the expiration dates of the pressure relieve valves. For Tank 3, the valves expire 9-2019 and for Tank 4, the valves expire 9-2020. (Pictures were taken of the safety relief valves.)

16. Applicant shall not operate the facility unless a remotely operated internal or external positive shut-off valve is installed to allow access for emergency shut-off of all flow from stationary storage containers.

Notes – There are two (2) shut-off valves. One is in the office and the second is mounted on the side of the small compressor shed in front of Tank 4. (Pictures were taken of the shut-off valves.)

17. Applicant shall not operate the facility unless a bulkhead, anchorage, or equivalent system is used at each transfer area so that any break resulting from a pull will occur at a predictable location while retaining intact the valves and piping on the plant side of the transfer area.

Notes – Verified break points and valves located on the piping in the transfer area.

18. Applicant shall not operate the facility unless liquid lines in rail and transport transfer areas are equipped with back pressure check valves and all liquid lines not requiring a back check valve and all vapor lines are equipped with properly sized excess flow valves. These valves shall be installed on the main container side of the predictable break point at the bulkhead.

Notes – Verified valves installed on the main container side of the break point at the bulkhead. (Pictures were taken of the valves.)

19. All hose shall be replaced five years after date of manufacture or more often if there is evidence of damage or deterioration.

Notes – The hoses were dated 2016 on the liquid and vapor lines. They are also marked "Remove before 2025". There was no evidence of damage or deterioration. Hoses should be replaced by 2021. ASP has established in June of 2016, a new hose program called Exaro. All monthly and annual hose testing documentation and re-certification records are online. ASP may want to check the hose retirement dates listed in Exaro for consistency with the permit requirements on hose replacement.

20. Applicant shall not operate the facility unless all transfer operations including transport deliveries are performed by a reliable person properly trained and made responsible for proper compliance with all applicable procedures. At least one more person trained in the proper use of equipment and emergency procedures shall be present at the facility during all transfers.

Notes – Only the two (2) facility staff do all transfers. (Rodney is one of them.) ASP staff have annual safety trainings and are HAZWOPER certified.

21. The applicant shall develop an emergency response plan to be followed in the event of an emergency. This plan shall be submitted in writing to, and approved by, the District Supervisor before any operation of the facility. Applicant shall not operate the ammonia storage facility unless this approved plan has been implemented and is maintained and followed. Prior to each spring season, the applicant shall review this plan with the local fire department.

Notes – A copy of the Emergency Action Plan was provided. It was revised on 8/10/2017 and will be effective 9/1/2017. Once the revised plan is reviewed with the local fire department, it is approved.

22. Applicant shall notify the Pollution Emergency Alert System (PEAS) 1-800-292-4706 and/or the District Supervisor immediately of any abnormal release of anhydrous ammonia from the facility. A normal release includes only hose coupling bleed down and operation of hydrostatic relief valves.

Notes – There have been no PEAS incidents that Rodney knows of. (He has been at this facility for two (2) years.)

23. A sign shall be present and conspicuously placed at the facility entrance stating the emergency phone numbers for the owner, primary operator, local and state police, local fire department, and ambulance service.

Notes – The sign is on the facility gate with all emergency phone numbers listed. (See picture of sign.)

Records:

Copies of records are attached to this activity report.

1. Airgas Specialty Products Monthly Inspection Program logs – Dates 1/10/17 to 8/25/17
2. Airgas Specialty Products Certification of Inspection and Test (8/28/17)

Summary:

The facility appeared in compliance with PTI 249-96. The only outstanding question was whether the revised Emergency Action Plan (effective 9/1/2017) had been reviewed with the local fire department. Rodney was going to check into it.



Image 1(1) : Shut-off valve in office

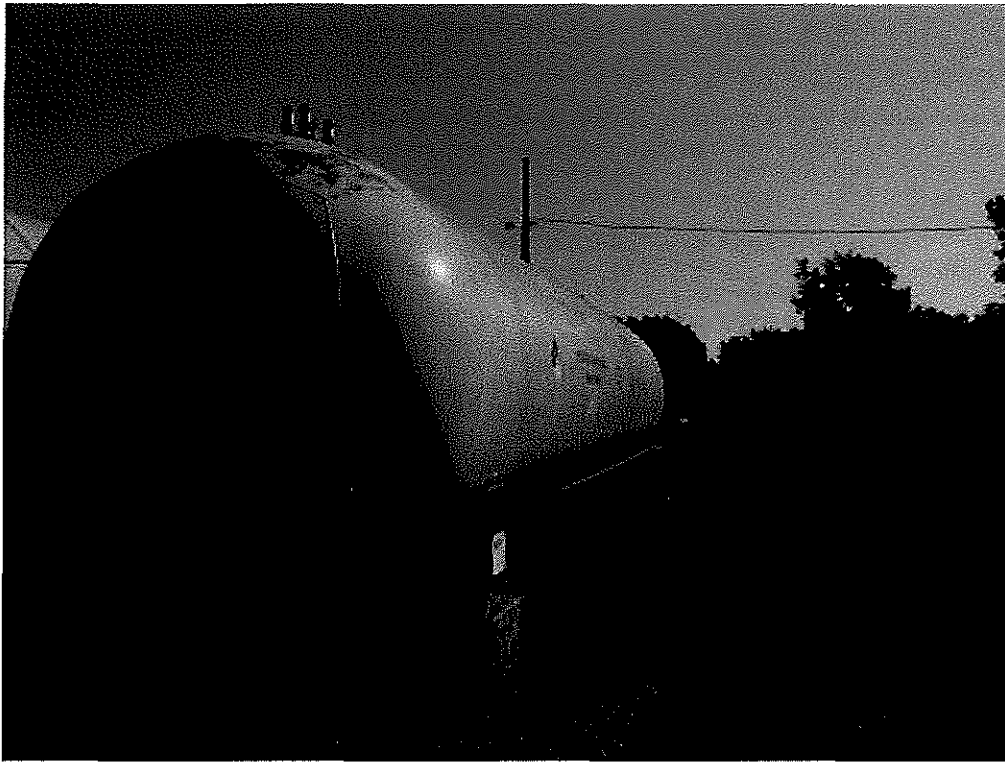


Image 2(2) : Tank 3 and safety relief valves

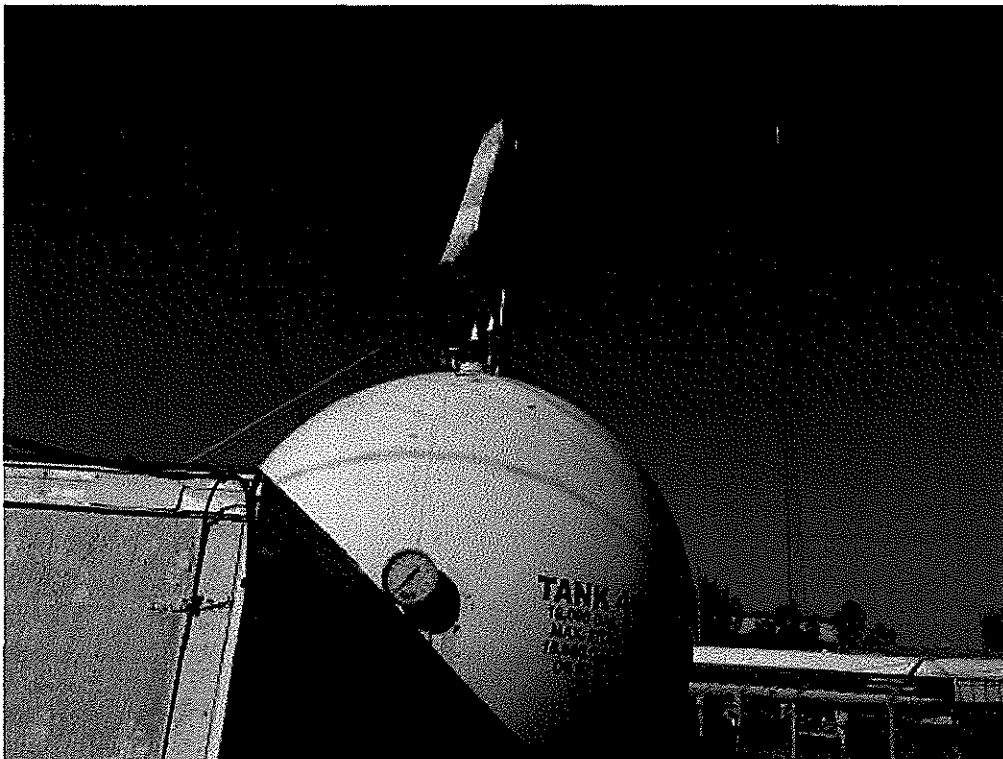


Image 3(3) : Tank 4 safety relief valves and shut-off switch on shed



Image 4(4) : Tank 4 - excess flow valve

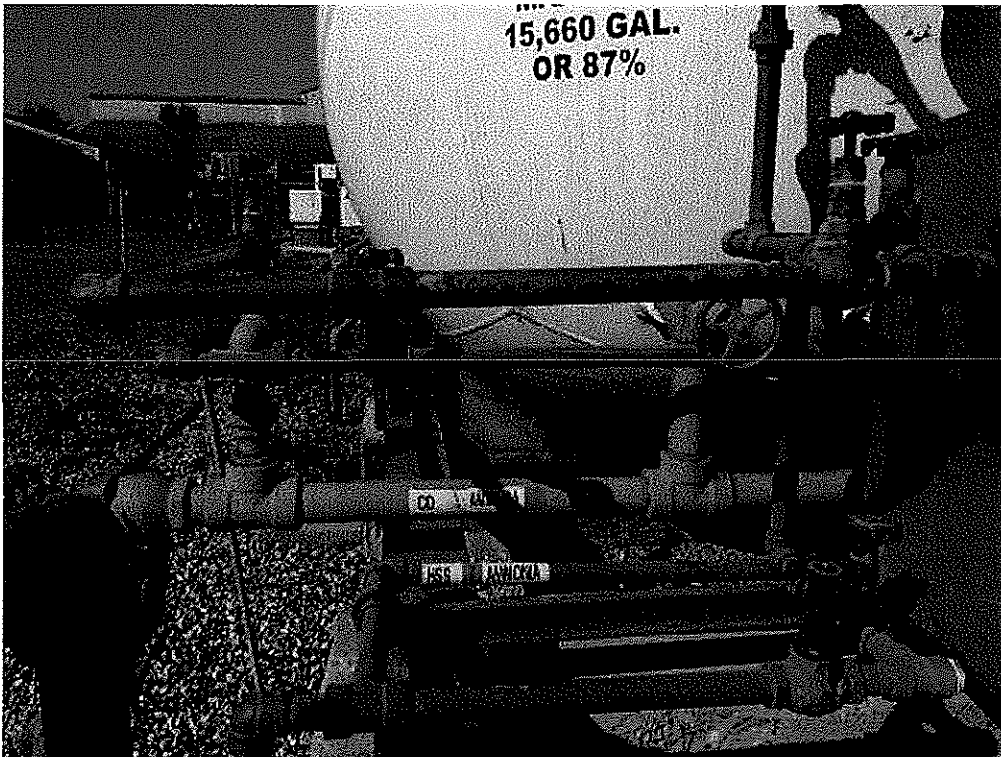


Image 5(5) : Excess flow valves and snappies in front of Tank 3.

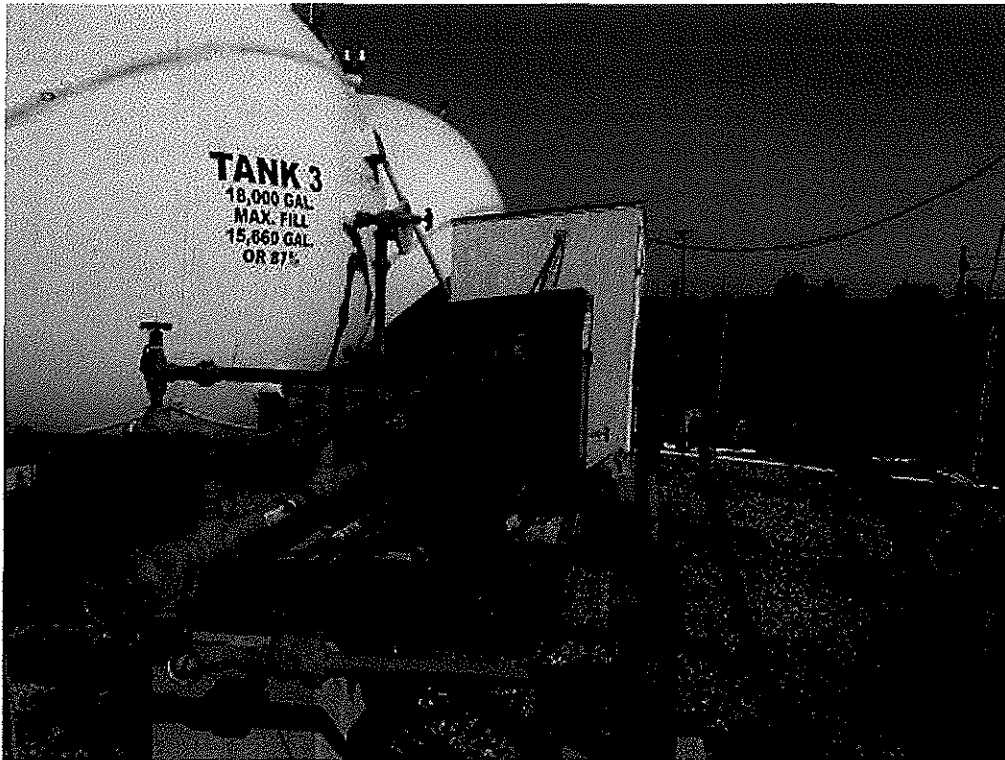


Image 6(6) : Header for both tanks and transfer hoses

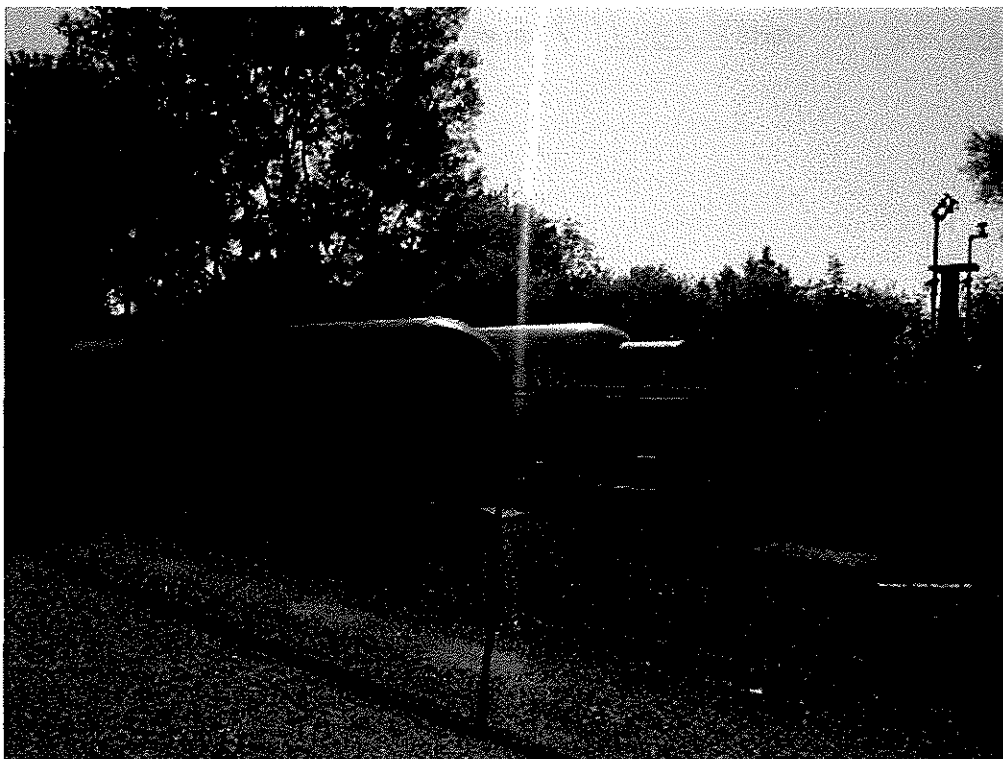


Image 7(7) : Out of service Tanks 1 and 2

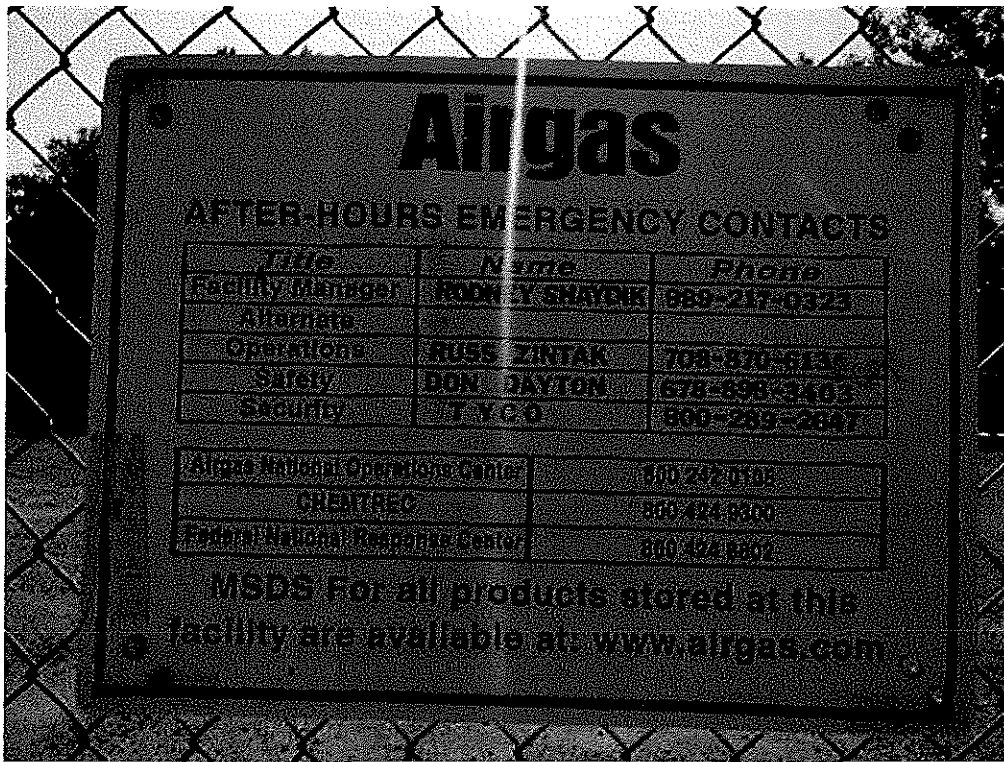


Image 8(8) : Emergency contacts sign

NAME Julie L. Brown DATE 8/31/17 SUPERVISOR B.M.