

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

N826130366

FACILITY: JORGENSEN FARM ELEVATOR		SRN / ID: N8261
LOCATION: 2215 DIETZ RD, WILLIAMSTON		DISTRICT: Lansing
CITY: WILLIAMSTON		COUNTY: INGHAM
CONTACT: Michael Turner, Vice President		ACTIVITY DATE: 07/23/2015
STAFF: Nathaniel Hude	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT:		
RESOLVED COMPLAINTS:		

Inspection Report

N8261- Jorgensen Elevator
2215 Dietz Road, Williamston, Michigan 48895

Inspection Date:

7/23/15

Facility Contacts:Mike Turner- 517-655-2121, jorgensenfe@gmail.com**MDEQ AQD Personnel:**Nathan Hude – 517-284-6779, HUDEN@michigan.gov**Facility Description:**

The site is a farm elevator for receiving and shipment of bulk grain. There is not a railway onsite, so shipment of grain is done by truck and tractor. It is located in a rural setting surrounded by farmland approx. two miles south of I-96.

Applicable Regulations:

1. General PTI 102-09
2. General PTI 234-09
3. General PTI 235-09
4. General PTI 236-09
5. Anhydrous Ammonia Safety and Security Practices (AASSPs) in accordance with Anhydrous Ammonia Security Act, Public Act 417 of 2006
6. 6 CFR Part 27 Appendix to Chemical Facility Anti-Terrorism Standards; Final Rule; Chemical of Interest List (for release, tanks > 10,000 lbs)
7. 40CFR60 DD does not apply due to storage capacity.

Previous Inspections:

10/07/09, Brian Culham, no concerns noted

This Inspection Key Concerns:

1. 3 of the 4 hoses expire this year and are in need of replacement prior to 2016
2. 1 of the 4 hoses expire in 2016 and will need to be replaced prior to 2017
3. One valve at the loading station was not under lock and could be opened thus enabling anhydrous ammonia release. This was corrected the day of finding.

Permit Unit Summary Tables

None

Unit Identification

None

MAERS Reporting

None

Inspection Summary

This was a unscheduled self-initiated inspection identified while in the area conducting other inspections. The site has PTI's for four tanks, though the PTI's are general and do not list or identify the specific tanks. All of the PTI's are identical in content.

I arrived around 1230 and went to the office. I asked for a manager or the owner while introducing myself and explaining the intent of my visit. Mike was in the office and introduced himself as the manager. I informed Mike of the purpose of my visit and he directed me to the tank area. Once we arrived, I provided Mike with a copy of the Inspection Brochure and reviewed it with him. I informed him that I would be performing the inspection to determine compliance with the 4 permits issued for the site.

Upon walking up to the tanks, I could hear a quiet hissing sound and smell anhydrous ammonia. I pointed the source to Mike and he tightened a valve to stop the slow leak. I informed Mike that the valve needs to be secured by lock to prevent accidental release or theft. He stated he has a lock for the valve and would ensure it was installed that day. I informed Mike that the situation was in violation to his permit and requested proof of the correction. Mike stated he would email me a picture of the valve under lock once completed. (I received a picture via email the following day, the picture was date stamped on the day of the inspection. Picture attached below)

All four tanks are routed to one distribution point. Piping maintenance was completed within the last two years by a local plumbing company.

The inspection was conducted using the sites permit(s).

Process/Operational Restrictions

2. The permittee shall not operate EU-AMMONIA unless the inspection and maintenance program specified in Appendix A has been implemented and maintained. (R 336.1901)
Notes: Confirmed via maintenance records check, performed by Mark House
3. The permittee shall not operate EU-AMMONIA unless an emergency response plan, to be followed in the event of an emergency, has been approved by the local fire department or county emergency response agency and is implemented and maintained. Prior to each spring season, the permittee shall review this plan with the local fire department or emergency response agency and make any necessary updates. (R 336.1901)
Notes: Reviewed ERP with Mike, document was signed by Mark House (who is acting Leroy Township Fire Chief)
4. EU-AMMONIA shall be located a minimum of 50 feet from the property line; 300 feet from any existing places of residence or private or public assembly; 500 feet from a school, apartment building, or institutional occupancy; and not less than 1000 feet from a hospital or nursing home. (R 336.1901)
Notes: confirmed via site observation, nearest residence is greater than 500 feet to the south
5. The permittee shall not operate EU-AMMONIA 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. (R 336.1901)
Notes: Did not observe transfer activities, yet operation is completed by only trained personnel via discussion with Mike.
6. Nurse and applicator tank storage shall be no less than 50 feet from the property line; 150 feet from any existing places of residence or private or public assembly; 250 feet from a school, apartment building, or institutional occupancy; and no less than 1000 feet from a hospital or nursing home. (R336.1901)
Notes: All nurse tanks are kept in locked buildings and located well outside distance requirements.
7. Nurse tank filling shall be done only from a permanent stationary storage tank. (R 336.1901)
Notes: Did not observe filling operations
8. Nurse and applicator tanks shall be filled to no more than 85 percent of liquid capacity by volume. Storage tanks may be filled according to temperature density correction tables in Rule 7801(b)(11) where tanks have a thermometer well and suitable level gauge. (R 336.1901)
Notes: Tanks were well less than 85%
9. Vapor return lines shall be employed whenever necessary to ensure an accidental release from pressure relief valves will not occur during ammonia transfer operations. (R 336.1901)
Notes: Confirmed installed
10. Nitrogen stabilizer shall not be added to any permanent stationary storage tank or to rail or truck transport tanks. (R 336.1901)
Notes: Did not discuss.

Design/Equipment Parameters

1. All containers shall be fitted with safety relief valves in accordance with Rule 7801(b)(9). Such valves shall be stamped with the date manufactured, and shall be replaced, or re-tested and re-certified, at least every five years or more often if there is evidence of damage or deterioration. (R 336.1225, R 336.1901)

Notes: In place, confirmed installation in 3/14/12 via records check.

2. The permittee shall not operate EU-AMMONIA 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. (R 336.1225, R 336.1901)

Notes: Confirmed in place

3. The permittee shall not operate EU-AMMONIA 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. (R 336.1225, R 336.1901)

Notes: Confirmed in place with manual emergency shutoff.

4. The permittee shall not operate EU-AMMONIA unless any 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. (R 336.1225, R 336.1901)

Notes: Confirmed in place.

5. All hoses shall be replaced five years after date of manufacture or more often if there is evidence of damage or deterioration. (R 336.1225, R 336.1901)

Notes: Found that 3 of the 4 hoses expire this year and will need to be replaced prior to next season. The other hose was valid for one more year.

6. Any vapor or liquid line, exclusive of couplings, requiring venting after ammonia transfer shall be vented through a water trap of 55 gallons minimum size. Safety water shall not be used for this purpose. (R 336.1225, R 336.1901)

Notes: Tanks was on site and filled with water.

7. 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. (R 336.1901)

Notes: Confirmed on site.

I left the site around 1330 noting the concerns of future hose replacements and the unsecure valve. These findings, if found to be repetitive in future inspections, will warrant a notice of violation.



Image 1(Valve Locks) : Valve Locks

NAME *J. Miller*

DATE 8/6/15

SUPERVISOR *B. M.*