

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

N827125758

<b>FACILITY:</b> BISCHER FARMS PARTNERSHIP		<b>SRN / ID:</b> N8271
<b>LOCATION:</b> 6121 PURDY RD, RUTH		<b>DISTRICT:</b> Saginaw Bay
<b>CITY:</b> RUTH		<b>COUNTY:</b> HURON
<b>CONTACT:</b> Brade Geiger , President		<b>ACTIVITY DATE:</b> 06/10/2014
<b>STAFF:</b> Richard Osentoski	<b>COMPLIANCE STATUS:</b> Compliance	<b>SOURCE CLASS:</b> MINOR
<b>SUBJECT:</b> 4/10/2014 self-initiated anhydrous ammonia facility inspection. This date was a little early, training had not taken place, application equipment was still in storage. 6/10/2014 follow-up inspection was conducted. Facility is in compliance. rfo		
<b>RESOLVED COMPLAINTS:</b>		

On April 9, 2014 Rich Osentoski from Saginaw Bay District (AQD) performed a self-initiated inspection of Bischer Farms Partnership anhydrous ammonia facility located at 6121 Purdy Road, Ruth, MI 48470, facility SRN is N8251 with a PTIs #100-09. R. Osentoski arrived at farm office at 1 PM, met with Brad Geiger (President), Office Phone: (989) 479-3267, Cell: (989) 551-0095, E-mail: bischerfarms@yahoo.com. Rich provided AQD ENVIRONMENTAL INSPECTION Brochures to Mr. Geiger, inspection process, rights/responsibilities were explained and discussed.

Required anhydrous ammonia records are kept in file folders and notebook at the Bischer Farms Office, are maintained by Mr. Geiger and Office Personal. Current General Permit N8251, PTI #100-09 is on file. 2013 Risk Management Plan (RMP) is current, the 2014 is in process of being reviewed and updated with the fire department. Annual safety training is provided to all staff on as needed basis. Current training and certification records for all employees are maintained in safety/training notebook, updated records will be available for review after 2014 training is concluded.

Anhydrous Ammonia safety meeting is conducted annually in the spring for employees associated with the facility. Topics covered are safe operation of the facility, emergency shutoff controls, water tank maintenance and locations. Discussion/demonstration of correct/safe operating procedures when transferring product from delivery trucks to storage tanks and from storage tanks to nurse tanks is part of the training. 2013 records were reviewed and found to be in compliance, will be updated prior to 2014 anhydrous use.

Brad uses a 3 ring notebook to maintain records for the storage and nurse tank records. Detailed records of inspection dates and repairs to facility storage tank and associated components/devices were reviewed. Current records show manufacture or recertification dates of hoses, safety and pressure relief valves for the storage and nurse tanks, records show several relief valves will need replacement. Brad says the 10 1,000 gallon nurse tanks will be completely inspected when removed from storage. Wheel bearings, pressure relief valves, hoses and safety equipment will be checked and replaced as needed to be in full compliance prior use in 2014 application season.

A 32,066 gallon anhydrous ammonia rail car has been converted to an on farm storage tank, certification of present pressure relief valve expires in 2014, a new valve new is on backorder, was expected to be installed long before today's (4/9/14) inspection. Installation by Industrial Propane Service, Inc. of Byron, MI has been promised as soon as a new valve is received. Appendix (A) Inspection and Maintenance checklists/worksheets for the storage and nurse tank(s) worksheets are current and kept in a notebook, the worksheets have tank ID #'s with inspection and valve replacement history for each tank, use of the worksheets will continue.

The anhydrous ammonia storage and nurse tank filling site is located approximately 1½ miles East of the farm office located on Purdy Rd., is located 1/8 of a mile West of Ruth Rd. Required signage is posted at facility entrance and further back near the storage tank, emergency phone numbers for facility contact, local police and local fire department are posted. The storage tank is located approximately 500' to the north off of Purdy Rd. The storage and nurse tanks are kept locked when not in use. Nurse tank loading riser and product receiving valves/piping are located on west end of the tank, mechanical cable system is attached to emergency shutoff valve, can be activated from various remote locations around the storage tanks including product receiving station.

No posts or guard rails are installed to protect west end of storage tank piping, valves, emergency shutoff valve cable, receiving and loading stations. Brad pointed out water pond 60-70 ft. north of the storage

tank, said this pond is considered emergency water supply in case of anhydrous release. 55 gal water barrel will be brought from storage when needed for use as bleed off trap.

The facility reports no malfunction or spill event with release to the atmosphere during years owned by Bischer Farms. No theft has ever occurred from this storage facility or nurse tanks. Anhydrous ammonia purchased and stored at this facility is not for resale, is applied solely to Bischer Farm crops.

Overall R. Osentoski found the facility to be well managed with required records complete and current for 2013 growing season, records for the past two years are maintained in folders and notebooks in main office along with General Operating Permit. Previous three years are stored in file cabinet, are available upon request.

AQD inspection findings were discussed with Mr. Geiger prior to leaving the facility. Areas that need to be addressed prior to an early June 2014 follow-up inspection. Risk Management Plan (RMP) update needs completion. Employee safety training provided and records updated. Install pressure relief valve on storage tank when valve is received. Inspect nurse tanks when removed from storage; inspect/replace wheel bearings, pressure relief valves, couplings and hoses as needed. Protect west end of storage tank piping, valves and devices with large concrete blocks piled nearby. Provide a 150 gal or larger water tank for emergency water supply and discontinue reliance of nearby pond for emergency use. Update records as needed.

June 10, 2014 1 PM follow-up Inspection: R. Osentoski of AQD met with Mike Stacer (Forman) at the Bischer Farm Office for the follow-up inspection. Up-dated Risk Management Plan and employee safety training records were reviewed and found up to date. Nurse tanks have been pulled from storage. Wheel bearings, pressure relief valves, hoses and couplings were inspected/replaced as needed and records updated.

On date if inspection anhydrous ammonia delivery was observed at storage tank site, bleed off water barrel was being used; emergency water tank was in place as required. Large concrete blocks have been positioned on bulk head end of storage tank and along sides to protect piping, couplings and valves associated with product receiving and loading of nurse tanks.

Mr. Geiger planned to have the storage tank relief valve changed this spring when Industrial Propane Services, Inc. inspected/serviced the storage tank this spring, did not happen, no relief valve that fits the rail car converted to storage tank has been found. Brad Geiger provided AQD a copy of letter from Jerry Davis of IPS indicating difficulty of finding the correct relief valve, Mr. Stacer said as soon as possible the valve will be replaced. Attached letter on file at Saginaw Bay District Office.

AQD Staff has determined this Bischer Farms Partnership, Ruth, MI anhydrous ammonia facility to be in full compliance at time of inspection. Railcar ammonia storage tank relief valve will be replaced as soon as possible before it is non-compliant. Mr. Geiger will notify AQD Saginaw Bay District Manager when the valve has been replaced. Bischer Farms Partnership President Brad Geiger is to receive a copy of this report, his E-mail: bischerfarms@yahoo.com , Cell: (989) 551-0095.  
RFO, 7/1/2014

NAME Richard Osentoski

DATE 7/2/2014

SUPERVISOR C. Ware



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Date: 6-3-14

Brad  
Bischer Farms  
6121 Purdy Road  
Ruth, MI 48470

Brad,

We are in the process in finding a railcar relief valve for your system. I am sorry to say we are not having good luck but are still trying to find a relief valve. We will keep working on this and let you know what we find out. Thank you for your patients and look forward in working with you.

Please call if you have any questions.

Thank you  
Jerry Davis  
Industrial Propane Service, Inc.