

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

P070035058

FACILITY: HARDYS LLC		SRN / ID: P0700
LOCATION: 2402 S PIOTTER, BLISSFIELD		DISTRICT: Jackson
CITY: BLISSFIELD		COUNTY: LENAWEЕ
CONTACT: Gregg Hardy,		ACTIVITY DATE: 06/20/2016
STAFF: Michael Gabor	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: Scheduled, announced minor source inspection of Hardys LLC anhydrous ammonia storage facility, general permit no. 63-16.		
RESOLVED COMPLAINTS:		

Scheduled, Announced Inspection of Hardys LLC (Minor Source), located at 2402 South Piotter Highway, Blissfield, Michigan 49228.

State Registration Number (SRN): P0700

Facility Contacts

Greg Hardy (GH), Site Manager / Owner, 517-403-5247

Purpose

On June 20, 2016, Zack Durham, Air Quality Division (AQD) Inspector, and I conducted a scheduled, announced inspection of the Hardys LLC's (HL) facility located in Blissfield, Michigan (Lenawee County) at 2402 South Piotter Highway. The purpose of the inspection was to determine the facility's compliance status with applicable federal and state air pollution regulations, particularly with the Michigan Natural Resources and Environmental Protection Act 451 of 1994, Part 55, Air Pollution Control and the administrative rules, and the conditions of HL's General Permit (PG) number 63-16, issued April 12, 2016. This is a newly permitted facility.

Facility Location

The facility is located within the unincorporated Deerfield Township. It is immediately surrounded by agricultural farms and sources.

Arrival & Facility Contacts

Visible emissions or odors were not observed upon our approach to the storage tank via South Piotter Highway. We arrived at approximately 9:30 am. The facility site manager / owner, GH, was already onsite and greeted us. GH extended his full cooperation during the inspection and accompanied us during the entire inspection.

Regulatory Applicability

The facility is a minor source and was recently issued GP no. 63-16.

Facility Background

HL operates an anhydrous ammonia storage tank having an 18,000 gallon capacity. The anhydrous ammonia is a source of nitrogen fertilizer used by HL to farm and grow about 800 to 1,000 acres of corn. The tank is only in operation at the beginning of the growing season and is typically filled and emptied sometime between April 1st and May 31st. The master tank gauge indicated that it was empty at the time of inspection.

Onsite Inspection Narrative

I provided GH with a copy of the Michigan Department of Environmental Quality (MDEQ) brochure entitled *Rights and Responsibilities Environmental Regulatory Inspections* and reviewed it with him. I then suggested to GH that he explain the overall operations of the tank as we walk through the special conditions of GP no. 63-16. GH explained that their tank employs a vapor-based system rather than a liquid based system because it is safer. However, it is slower loading / unloading compared to the liquid system. He also pointed out where the tanks connect to the system in order to load and unload the anhydrous ammonia.

The overall tank appeared to be in good condition. The tank's exterior paint appeared to be in new condition and no signs of rust or corrosion were noted. GH provided examples of the inspection and maintenance program records required to maintain compliance with permit special condition (SC) III.2. He then confirmed that the local Deerfield Michigan Fire Department has their emergency plan on file and that they recently conducted their annual inspection. The only request to GH was to post a phone number on the entrance sign indicating whom to call in case of an emergency.

Per SCs III.4 and III.6, the tank appears to meet the land spacing requirements based on a visual assessment. In addition, the GP application provides distances that also meet SCs III.4 and III.6. GH confirmed that all users of the tank are trained in operating anhydrous ammonia tanks, per SC III.5. GH confirmed that only a nurse tank is filled from the permanent stationary storage tank, that the tank is not filled to more than 85% of its liquid capacity by volume, and he pointed out the vapor return lines, per SCs III.7, III.8 and III.9, respectively.

GH confirmed and pointed out the four tank safety valves, and confirmed that they were replaced on August 2014, which meets the replacement interval required by SC IV.1. He then pointed out the remotely operated external positive shut-off valve, as required by SC IV.2, and explained how it worked. It is located upwind of the loading area and employs a mechanical system rather than an electronic system for added durability and reliability. I suggested that he put a sign up to indicate the location of the emergency shut off valve and he agreed that would do so.

GH then pointed out the two bulkheads and valves used to comply with SCs IV.3 and IV.4, respectively. The hoses were installed during the month of March 2016 and meet the replacement interval required by SC IV.5. Since the anhydrous ammonia tank is currently empty for the remaining growing season of 2016, the minimum required 55 gallon sized water trap / drum, per SC IV.6 was not onsite. GH noted that one is onsite while the tank is in operation. GH confirmed that no malfunctions or spills have occurred since commencing operations, and no records are available per SC VI.1.

Post-Inspection Meeting

I thanked GH for his assistance and cooperation, and informed him that I had no compliance concerns. We departed the facility at approximately 10:20 am.

Recordkeeping Review

Records were reviewed, as indicated above in the *Onsite Inspection Narrative* section.

Compliance Summary

Based upon the visual observations, HL appears to be in substantial compliance with

the applicable GP No. 63-16 SCs and requirements.

NAME Michael M. Haber DATE 6/21/2016 SUPERVISOR [Signature]