

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION

ACTIVITY REPORT: Self Initiated Inspection

U23161207237616

FACILITY: Michigan Bean and Spelt, LLC		SRN / ID: U231612072
LOCATION: 728 Montgomery St, Eaton Rapids		DISTRICT: Lansing
CITY: Eaton Rapids		COUNTY: EATON
CONTACT: Carleigh Nobach , Operations Manager		ACTIVITY DATE: 11/10/2016
STAFF: Michelle Luplow	COMPLIANCE STATUS: Compliance	SOURCE CLASS:
SUBJECT: Self-initiated compliance inspection to determine the facility's operating status and determine if the equipment associated with PTI 62-90 was still present.		
RESOLVED COMPLAINTS:		

Inspected by: Michelle Luplow

Personnel Present: Carleigh Nobach, Operations Manager (nobachca@gmail.com)

Purpose: Conduct an unannounced, self-initiated compliance inspection to determine if the facility was still present and if so, to determine compliance with the Permit to Install (PTI) No. 62-80 for grain dryer baghouse. Additionally, the inspection was conducted to determine if Michigan Bean & Spelt is subject to the NSPS Subparts A and DD, Standards of Performance (NSPS) for Grain Elevators, and whether they should be reporting to the Michigan Air Emissions Reporting System (MAERS). There are currently no records in MACES, nor in the AQD files that this facility has ever been inspected. This facility does not have a state registration number (SRN).

Facility Background/Regulatory Overview: Michigan Bean & Spelt, LLC became owners of this grain elevator in 2000, when Mr. Long sold the property under its former name, Long Bean and Grain (under which PTI 62-80 was issued). Carleigh Nobach, Operations Manager, said that they process, store, and sell corn, soybeans, spelt, and black beans for human consumption. She said the majority of their operations are for family or private farmers. They also store and use micro and macro nutrients.

Inspection: This was an unannounced self-initiated compliance inspection. At approximately 1:15 p.m. on November 10, 2016 I met with C. Nobach. I explained to her that the main reason I was there was to determine if the facility was still operating and if so, if they still had the equipment permitted under PTI No. 62-80. I provided her with a July 2014 Permit to Install Exemptions Handbook.

C. Nobach provided me with a map of the facility. There are currently 13 silos, 3 column grain dryers, 3 truck loadout areas, 2 dump pits, and a mill which includes a gravity table, dehullers, and an asperator. C. Nobach said that 2 of the 3 grain dryers are not used. See attached for elevator layout.

Exemption Rule 285(p)

All commercial equipment used for grain unloading, handling, cleaning, storing, loading, or drying in a column dryer that has a column plate perforation of not more than 0.094 inches are exempt from obtaining a permit to install. All equipment located at this site is exempt from a permit to install based on exemption Rule 285(p).

PTI No. 62-80

This PTI was issued for a baghouse installed upstream of the grain dryer. C. Nobach has yet to verify whether this equipment is still present onsite. At the time of the inspection she was unsure. I will void the permit upon request from Michigan Bean & Spelt. This equipment would be exempt under Rule 285(p), otherwise.

NSPS DD

C. Nobach said Michigan Bean & Spelt has a permanent storage capacity of 680,000 bushels, which is less than the 2.5 million bushels needed to be considered a "terminal grain elevator" and therefore subject to 40 CFR 60, New Source Performance Standard DD (NSPS Subpart DD). If Michigan Bean & Spelt decides to expand their permanent storage capacity and exceeds 2.5 million bushels of permanent storage capacity, they would become subject to NSPS DD and automatically have to report to MAERS. Also, any NSPS-subject "facilities" installed after the date the elevator became a terminal grain elevator may be subject to further requirements as spelled out in the regulation.

MAERS

C. Nobach provided numbers for the total throughput of corn, soy and spelt throughput at the grain elevator for 2015, totaling 110,585.06 bushels. According to the white paper "Calculating Potential to Emit (PTE) and Other Guidance for Grain Handling Facilities" dated 11/14/95 from John Seitz, Director of the Office of Air Quality Planning and Standards, truck

receiving/truck shipping has an associated PTE of 50 tons/year of PM-10 emissions for a throughput of 14 million bushels. Assuming a linear relationship between the number of bushels and PM-10 emissions, the PM-10 emissions from Michigan Bean and Spelt for approximately 111,000 bushels would be approximately 0.39 tons PM10/year for 2015. Michigan Bean & Spelt would have to be emitting 15 tons of PM-10 per year in order to be required to report to MAERS; at this time they are not required to report.

NAME Michelle LymanDATE 12/5/16SUPERVISOR B.M.