DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: On-site Inspection

N832573044

FACILITY: WOODWORTH INC		**SRN / ID:** N8325
LOCATION: 4201 PIER NORTH BLVD, FLINT		**DISTRICT:** Lansing
CITY: FLINT		**COUNTY:** GENESEE
CONTACT: Sean Backer , Plant Manager		**ACTIVITY DATE:** 08/09/2024
STAFF: Daniel McGeen	**COMPLIANCE STATUS:** Compliance	**SOURCE CLASS:** MINOR
SUBJECT: Unannounced inspection of facility last inspected in 2016.		
RESOLVED COMPLAINTS:		

On August 9, 2024, the Michigan Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD) conducted an unannounced inspection of Woodworth Inc. (Woodworth), which had last been inspected by the AQD in 2016.

Environmental contact:

- Sean Backer, Plant Manager; 810-820-6780 ext. 302; sbacker@woodworthinc.com
- Robert Lixey, General Manager; 248-481-2354; rlixey@wwiflint.com

EGLE, AQD contact:

Dan McGeen, Inspector; 517-648-7547; McGeenD@michigan.gov

Facility description:

This is a metal heat treating facility that performs stress relief heat treating and gaseous ferritic nitrocarburizing (FNC) heat treating for automotive drive train components.

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Emission units:

Emission Unit* ID	Emission Unit Description	Permit To Install (PTI), Michigan Air Pollution Control (MAPC) Or Other Rule	Compliance Status
F-1	Tip-up style furnace, natural gas fired, 4 million Btu/hr, installed before 12/20/2016.	MAPC Rule 282(a)(i), rather than Rule 282(2)(a)(i)	Compliance; not operating
F-2	Tip-up style furnace, natural gas fired, 4 million Btu/hr, installed before 12/20/2016.	MAPC Rule 282(a)(i), rather than Rule 282(2)(a)(i)	Compliance; not operating
F-3			Compliance

	Tip-up style furnace, natural gas fired, 4 million Btu/hr, installed before 12/20/2016.	MAPC Rule 282(a)(i), rather than Rule 282(2)(a)(i)	
F-4	Tip-up style furnace, natural gas fired, 4 million Btu/hr, installed before 12/20/2016.	MAPC Rule 282(a)(i), rather than Rule 282(2)(a)(i)	Compliance; not operating
EUHEATTREAT5	A natural gas fired vacuum nitriding furnace that conducts heat treat and ferritic nitrocarburizing with a heat input rating of 1.23 MMBtu/hr with a burnoff flame rated at 0.182 MMBtu/hr.	PTI 41-19A	Compliance; not operating
EUHEATTREAT6	A natural gas fired vacuum nitriding furnace that conducts heat treat and ferritic nitrocarburizing with a heat input rating of 1.23 MMBtu/hr with a burnoff flame rated at 0.182 MMBtu/hr.	PTI 41-19A	Not yet installed
EUDEGREASER	Open top vapor degreaser with a refrigerated freeboard device.	PTI 97-20	Compliance, installed but never operated
EUAMMONIA (1)	12,000-gallon anhydrous ammonia tank.	Gen. PTI 213-09	Compliance
EUAMMONIA (2)	12,000-gallon anhydrous ammonia tank.	Gen PTI 214-09	Compliance
Emergency engine	Diesel fired emergency engine.	MAPC Rule 285(2)(g); 40 CFR Part 60, Subpart IIII	Did not observe

***An *emission unit* is any part of a stationary source that emits or has the potential to emit an air contaminant.**

Flexible Groups:**

NA

****A *flexible group* is used in a permit to install (PTI) or Renewable Operating Permit (ROP) to combine two or more emission units that have common or identical requirements.**

Regulatory overview:

This facility is considered a *minor source* of *criteria pollutants*, that is, those pollutants for which a National Ambient Air Quality Standard (NAAQS) exist. These include carbon monoxide, nitrogen oxides, sulfur dioxide, volatile organic compounds (VCOs), lead, particulate matter smaller than 10 microns (PM10), and particulate matter smaller than 2.5 microns (PM2.5). A *major source* of criteria pollutants has the potential to emit (PTE) of 100 tons per year (TPY) or more of any one of the criteria pollutants and would be subject to the Renewable Operating Permit program.

This facility is also considered to be a minor or *area source* for hazardous air Pollutants (HAPs), because it has a PTE of less than 10 TPY for any single HAP and less than 25 TPY for all HAPs combined.

The Michigan Air Pollution Control (MAPC) Rules contain exemptions from the requirement of MAPC Rule 201 to obtain a permit to install. These include:

- MAPC Rule 282(a)(i), as it existed prior to 12/20/2016, exempting furnaces for heat treating metal which fire sweet natural gas and rated at no more than 10 million Btu/hr which do not involve molten materials, oil-coated parts, or oil quenching. (On 12/20/2016, it became Rule 282(2)(a)(i) and excluded heat treating furnaces which involve ammonia.)
- MAPC Rule 285(2)(g), which exempts internal combustion engines that have less than 10,000,000 Btu/hour maximum heat input.

There are said to be no boilers onsite. The federal regulation 40 CFR Part 63, Subpart JJJJJJ—National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources was written for area sources of HAPs. Residential-size hot water heaters for restrooms are not likely to be subject to this boiler regulation. To meet the definition of a hot water heater in this area source Generally Achievable Control Technology (GACT) standard, the units must be no more than 120 gallons in capacity. Pursuant to Section 63.11195(f), because any units here are believed to be below 120 gallons, they are considered exempt from Subpart JJJJJJ.

Fee status:

This facility is not considered fee-subject, because it is not a major source for either criteria pollutants or HAPs, and because it is not subject to either a federal new source performance standard or a federal national emission standard for hazardous air pollutants except for the diesel fired emergency engine. Where an emergency alone is subject to a federal standard, AQD has not classified facilities as fee-subject..

This facility is not required to submit an annual air emissions report to the AQD. Criteria for determining if a facility should report emissions each year are contained in AQD Operational Memorandum No. 13.

Location:

- Address: 4201 Pier North Boulevard, Flint, 48504, Genesee County.
- Description: The facility is located at the very north end of an industrial park. To the immediate south are industries. To the southeast are businesses, and to the southeast by 1200 feet is a hotel. To the east is undeveloped land, with a mobile home park beyond that. To the west is undeveloped land, followed by a business and a residential area.

Operating schedule:

24 hours/day, 5 days/week*

***On Mondays the furnaces fire up in the afternoon but are not ready to heat treat parts until 8:00 or 9:00 PM. The facility conducts heat treating until Saturday mornings. Therefore, on Monday mornings it is not possible to observe any equipment operating.**

Safety apparel required:

Safety glasses are the required personal protective equipment for this facility.

Recent history:

PTI 49-19A, to add a new heat treat furnace, EUHEATTREAT6, to the plant, was approved on 8/8/2024, the day before the unannounced inspection. EUHEATTREAT6 was not installed yet, as of the date of the inspection.

Odor evaluation:

- Start time of odor evaluation: 10:02 AM.
- Weather conditions: Sunny, humid, and 73 degrees F, with winds out of the west at 0-5 miles per hour.
- Route taken: From Pierson Rd., turning north onto Pier North Blvd., and driving to the north end of the road, adjacent to Woodworth's property.
- Odors detected: No odors were detected from Woodworth.

Arrival:

AQD was represented by Dan McGeen, inspector.

- Arrival time: 10:07 AM.
- Weather conditions: Sunny, humid, and 73 degrees F, with winds out of the west at 0-5 miles per hour.
- Odors detected: None.
- Visible emissions detected: None.

D. McGeen checked in at the counter in the lobby. He had previously provided his credentials, per AQD procedure, during a site visit on 5/20/2024. Today he met with Sean Backer, Plant Manager, and explained the reason for the visit.

During the pre-inspection meeting, the issuance of PTI 41-91A the previous day was discussed. Installation of EUHEATTREAT6 has not begun yet. Recordkeeping was discussed prior to the plant walk-through.

Inspection:

S. Backer accompanied D. McGeen through the facility. Housekeeping was very good, and there were no odors inside the plant.

F-1 through F-4, 4 tip up style heat treating furnaces; MAPC Rule 282(2)9a)(i):

The current tip-up style furnaces are exempt from PTI requirements since they were installed prior to December 2016 when the exemptions were updated. The tip-ups push oxygen out with nitrogen and are then back-filled with ammonia.

Furnace F-3 was operating at the time of the inspection, finishing at 10:55 AM. There were no visible emissions from the exhaust stack, which was visible when one stood some distance to the north of the facility.

EUHEATTREAT5 and EUHEATTREAT6, PTI 41-19A:

The vacuum nitriding furnace (VNF) operates similarly to the 4 tip-up style furnaces; however, the VNF utilizes pumps to create vacuum during the heating stage. Drawing out the ambient air during the heating effectively decrease oxidation, and allows the metal parts to become hotter, creating a higher quality case-hardening. After the ambient air is pumped out, ammonia mixed with CO2 comes in. Nitrogen from the ammonia and carbon from the CO2 diffuse into the metal to create a protective layer.

EUHEATTREAT6 has not been installed yet, as PTI 41-19A which authorizes it was only approved 8/8/2024, the day before the inspection. AQD was shown where the unit will be installed. It will be identical to EUHEATTREAT5.

EUHEATTREAT5 was not operating at the time of the inspection. It was opened up for servicing. Please see compliance checklist below.

Compliance check with Special Conditions (SC) of PTI 41-19A:

EUHEATTREAT5 EMISSION UNIT CONDITIONS

DESCRIPTION: A natural gas fired vacuum nitriding furnace that conducts heat treat and ferritic nitrocarburizing with a heat input rating of 1.23 MMBtu/hr with a burnoff flame rated at 0.182 MMBtu/ hr.

Flexible Group ID: NA

POLLUTION CONTROL EQUIPMENT NA

Compliance check with PTI 41-19A, EUHEATTREAT5 SC:

PTI 41-19A SC	Requirement	Comments	Complies?
EUHEATTREAT5, SC I.	NA	NA	NA
EUHEATTREAT5, SC II.1	The permittee shall burn only natural gas fuel in EUHEATTREAT5.	The facility met this requirement, as the AQD was shown the natural gas fuel line.	Yes

EUHEATTREAT5, SC III.1	**The permittee shall not perform more than 625 FNC type heat treat cycles in EUHEATTREAT5 per 12-month rolling time period as determined at the end of each calendar month.**	**The facility met this requirement, as only 119 heat treat cycles have been run since the process was first installed, several years ago. 55 of those were in 2024.**	**Yes**
EUHEATTREAT5, SC IV.1	**The maximum combined design heat input capacity for EUHEATTREAT5 shall not exceed 2.0 MMBtu per hour on a fuel heat input basis.**	**The facility met this requirement by the design of the unit.**	**Yes**
EUHEATTREAT5, SC V.	**NA**	**NA**	**NA**
EUHEATTREAT5, SC VI.	**Records shall be maintained on file for a period of five years.**	**The facility met this requirement by.**	**Yes**
EUHEATTREAT5, SC VI.1	**The permittee shall complete all required calculations in a format acceptable to the AQD District Supervisor by the last day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition.**	**NA, as the permit does not require calculations.**	**NA**
EUHEATTREAT5, SC VI.2	**The permittee shall monitor and record, in a satisfactory manner, the total number of FNC heat treat cycles in EUHEATTREAT5 on a monthly and 12-month rolling time period basis. The permittee shall keep all records on file and make them available to the Department upon request.**	**The facility met this requirement.**	**Yes**
EUHEATTREAT5, SC VII.	**NA**	**NA**	**NA**

EUHEATTREAT5, SC VIII.	The exhaust gases from the stacks listed in the table below shall be discharged unobstructed vertically upwards to the ambient air unless otherwise noted:	Please see below.	See below
EUHEATTREAT5, SC VIII.1	Stack SV-FNC5 is required to have a maximum diameter of 24 inches and a minimum height of 50.3 feet above ground level.	The facility met this requirement, finding records which showed stack height was 50.33 feet.	Yes
EUHEATTREAT5, SC IX.	NA	NA	NA

EUHEATTREAT6 EMISSION UNIT CONDITIONS

DESCRIPTION: A natural gas fired vacuum nitriding furnace that conducts heat treat and ferritic nitrocarburizing with a heat input rating of 1.23 MMBtu/hr with a burnoff flame rated at 0.182 MMBtu/ hr.

Flexible Group ID: NA

POLLUTION CONTROL EQUIPMENT NA

Compliance check with PTI 41-19A, EUHEATTREAT6 SC:

PTI 41-19A SC	Requirement	Comments	Complies?
EUHEATTREAT6, SC I.	NA	NA	NA
EUHEATTREAT6, SC II.1	The permittee shall burn only natural gas fuel in EUHEATTREAT6.	Not yet installed.	Not installed
EUHEATTREAT6, SC III.1	The permittee shall not perform more than 625 FNC type heat treat cycles in EUHEATTREAT6 per 12-month rolling time	Not yet installed.	Not installed

	period as determined at the end of each calendar month.		
EUHEATTREAT6, SC IV.1	**The maximum combined design heat input capacity for EUHEATTREAT6 shall not exceed 2.0 MMBtu per hour on a fuel heat input basis.**	**Not yet installed.**	**Not installed**
EUHEATTREAT6, SC V.	**NA**	**NA**	**NA**
EUHEATTREAT6, SC VI.	**Records shall be maintained on file for a period of five years.**	**Not yet installed.**	**Not installed**
EUHEATTREAT6, SC VI.1	**The permittee shall complete all required calculations in a format acceptable to the AQD District Supervisor by the last day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition.**	**Not yet installed.**	**Not installed**
EUHEATTREAT6, SC VI.2	**The permittee shall monitor and record, in a satisfactory manner, the total number of FNC heat treat cycles in EUHEATTREAT6 on a monthly and 12-month rolling time period basis. The permittee shall keep all records on file and make them available to the Department upon request.**	**Not yet installed.**	**Not installed**
EUHEATTREAT6, SC VII.	**NA**	**NA**	**NA**
EUHEATTREAT6, SC VIII.	**The exhaust gases from the stacks listed in the table below shall be discharged unobstructed vertically upwards to the ambient air unless otherwise noted:**	**Not yet installed.**	**Not installed**
EUHEATTREAT6, SC VIII.1	**Stack SV-FNC6 is required to have a maximum diameter of 24 inches and a minimum height of 50.4 feet above ground level.**	**Not yet installed.**	**Not installed**
EUHEATTREAT6, SC IX.	**NA**	**NA**	**NA**

(End of compliance check.)

EUVAPORDEGREASER, PTI 97-20:

The batch vapor degreaser was installed, but has never operated, because the work for it did not materialize. It has not been charged with the cleaning solvent n-propyl bromide.

EUAMMONIA (1) and (2), General PTI 213-09 and 214-09:

The two 12,000-gallon anhydrous ammonia storage tanks are located outdoors on the north side of the plant. AQD was informed they are checked each shift, i.e. 3 times per day.

The east tank is no. 1 and the west is no. 2. Data on the tanks was as follows:

- No. 1: 41.3% full by telemetry unit, 44% full by analog gauge, and 110 psi.
- No. 2: 48.0% full by telemetry, 52% full by analog gauge, and 75 psi.

Because the two tanks, identified as 1 and 2, are identical, and the general permits are identical, one compliance checklist is being used to represent both tanks, below:

Compliance check with General PTI 213-09 and 214-09, EUAMMONIA SC:

Gen. PTI 213-09 and 214-09	Requirement	Comments	Complies?
EUAMMONIA, SC I.	NA	NA	NA
EUAMMONIA, SC II.	NA	NA	NA
EUAMMONIA, SC III.1	Except where specific requirements of these special conditions are applicable and more stringent, EUAMMONIA shall comply with the Department Of Labor and Economic Growth General Industry Safety Standards, Part 78. Storage and Handling of Anhydrous Ammonia – (1910.111) hereinafter Rule 7801. A copy of this document, which may be obtained by contacting the	The facility met this requirement, by maintaining a digital copy onsite.	Yes

	Michigan Occupational Safety and Health Administration, MIOSHA Standards Section, 7150 Harris Drive, P.O. Box 30643, Lansing, MI 48909-8143, shall be maintained for inspection at the facility.		
EUAMMONIA, SC III.2	**The permittee shall not operate EU-AMMONIA unless the inspection and maintenance program specified in Appendix A has been implemented and maintained.**	**The facility met this requirement, by having Air Gas inspect the tanks quarterly. See also the Appendix A (I & M program) checklist later in this report.**	**Yes**
EUAMMONIA, SC III.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.**	**The facility met this requirement, showing the AQD a current electronic copy with a 4/18/2024 signature by Elmer Wilson of Mt. Morris Fire Dept. The plan is said to be submitted to the fire dept. every year. They also internally do an evacuation exercise each year.**	**Yes**
EUAMMONIA, SC III.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.**	**The facility met this requirement, as measured by D. McGeen using Google Maps.**	**Yes**
EUAMMONIA, SC III.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.**	**The facility met this requirement, as Air Gas does the deliveries and transfers.**	**Yes**

EUAMMONIA, SC III.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.**	**NA, as this relates to portable tanks used for agriculture.**	**NA**
EUAMMONIA, SC III.7	**Nurse tank filling shall be done only from a permanent stationary storage tank.**	**NA, as this relates to portable tanks used for agriculture.**	**NA**
EUAMMONIA, SC III.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.**	**NA, as they have neither nurse nor applicator tanks. However, the facility does not fill ammonia tanks 1 and 2 over 85 percent of liquid capacity by volume.**	**NA**
EUAMMONIA, SC III.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.**	**The facility met this requirement.**	**Yes**
EUAMMONIA, SC III.10	**Nitrogen stabilizer shall not be added to any permanent stationary storage tank or to rail or truck transport tanks.**	**The facility met this requirement.**	**Yes**
EUAMMONIA, SC IV.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.**	**The facility met this requirement. The latest I&M report (attached) has dates of replacement as "C20", believed to mean they were certified or installed in 2020 and will not need replacement, retesting, or**	**Yes**

		recertification until 2025.	
EUAMMONIA, SC IV.2	The permittee shall not operate EU-AMMONIA unless a remotely operated internal or external positive shutoff valve is installed to allow access for emergency shut-off of all flow from stationary storage containers.	The facility met this requirement. Remote shutoff controls are accessible from inside the plant.	Yes
EUAMMONIA, SC IV.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.	This was unclear. The AQD can follow up with Robert (Bob) Lixey in the future, it was suggested.	Pending
EUAMMONIA, SC IV.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.	The facility met this requirement. Note: Liquid lines are outside the building, and only vapor lines enter the building itself.	Yes
EUAMMONIA, SC IV.5	All hoses shall be replaced five years after date of manufacture or more often if there is evidence of damage or deterioration.	NA, as they have steel pipelines instead of hoses.	NA
EUAMMONIA, SC IV.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.	NA, as they have pipelines and do not need to vent after ammonia transfer.	NA
			Yes

EUAMMONIA, SC IV.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.**	**The facility met this requirement, referencing a sign at their front door.**	
EUAMMONIA, SC V.	**NA**	**NA**	**NA**
EUAMMONIA, SC VI.	**Records shall be maintained on file for a period of five years.**	**The facility met this requirement.**	**Yes**
EUAMMONIA, SC VI.1	**The permittee shall keep, in a satisfactory manner, records of the date, duration, and description of any malfunction or spill occurring from EU-AMMONIA, including the estimated amount of ammonia released into the atmosphere. Do not include trace amounts from normal hose coupling bleed downs. All records shall be kept on file and made available to the Department upon request.**	**The facility indicated that they have never had a leak.**	**Yes**
EUAMMONIA, SC VI.2	**The permittee shall keep, in a satisfactory manner, records of the date of annual review and approval of the emergency response plan with the local fire department. All records shall be kept on file and made available to the Department upon request.**	**The facility met this requirement and showed the AQD a digital copy of the emergency response plan signed on 4/18/2024 by Elmer Wilson of Mt. Morris Fire Dept., and a copy signed by LEPC chairperson Christopher Vogt.**	**Yes**
EUAMMONIA, SC VII.1	**The permittee shall notify the Pollution Emergency Alert System (PEAS) 1-800-292-4706 and/or the AQD District Supervisor immediately of any abnormal release of anhydrous ammonia from EU-AMMONIA. A normal release includes only hose**	**So far this is NA, as they are said to have never had any abnormal releases.**	**NA**

	coupling bleed downs, operation of hydrostatic relief valves, and normal pressure relief from the safety relief valve(s). Relief due to overfilling is not normal. All records shall be kept on file for a period of at least five years and made available to the Department upon request.		
EUAMMONIA, SC VIII.	**NA**	**NA**	**NA**
EUAMMONIA, SC IX.1	**The permittee shall not replace or modify any portion of EU-AMMONIA, nor install new equipment unless all of the following conditions are met:**	**Please see below.**	**See below**
EUAMMONIA, SC IX.1(a)	**The permittee shall update the general permit by submitting a new Process Information Form (EQP5731) to the Permit Section and District Supervisor, identifying the existing and new equipment a minimum of 10 days before the replacement, modification, or installation of new equipment.**	**NA, as they have never replaced or modified any portion of the tanks.**	**NA**
EUAMMONIA, SC IX.1(b)	**The permittee shall continue to meet all general permit to install applicability criteria after the replacement, modification or installation of new equipment is complete.**	**NA, as they have never replaced or modified any portion of the tanks.**	**NA**
EUAMMONIA, SC IX.1(c)	**The permittee shall keep records of the date and description of any replacement, modification, or installation of new equipment at the source. All records shall be kept on file for a period of at least five years and made available to the Department upon request.**	**NA, as they have never replaced or modified any portion of the tanks.**	**NA**

Compliance check with APPENDIX A of General PTI 213-09 and 214-09, Page 2 of 2, Permanent Ammonia Storage Tank:

Note: Page 1 of 2 is NA, as it is only for nurse and applicator tanks

Permittee shall conduct inspections and complete form at least twice per year, prior to spring and fall application seasons

I&M Requirements	Comments	Complies?
1. Tank free of leaks.	This was met.	Yes
2. Tank supports in good condition (no cracked or crumbled concrete, etc.).	This was met.	Yes
3. Paint in good condition.	This was met.	Yes
4. Equipment locked when not in use.	This was met.	Yes
5. Tank properly labeled.	This was met.	Yes
6. Valves and fittings free from leaks and in good Condition.	This was met.	Yes
7. Piping properly supported and guards in place.	This was met.	Yes
8. Pipes free of physical damage and rust and properly painted.	This was met.	Yes
9. Employees trained in proper filling procedures.	This was met, by Air Gas staff.	Yes
	This was met, as Air Gas brings their own equipment.	Yes

10. Provisions provided for bleeding of transfer hose from the transport truck.		
11. Wheels properly chocked on the transport truck or rail tank car while unloading.	**Did not observe.**	**Did not observe**
12. Information and warning signs displayed and in good condition.	**This was met.**	**Yes**
13. Area free of weeds, trash and other unsafe conditions.	**This was met.**	**Yes**
14. Unused equipment stored out of the way.	**This was met.**	**Yes**
15. Chemical safety goggles available and in good condition.	**This was met. The AQD was shown goggles in cabinet.**	**Yes**
16. Protective gloves, boots, suits or slickers available and in good condition.	**This was met.**	**Yes**
17. Gas masks with ammonia type canisters and refill canisters within date limits available.	**This was met.**	**Yes**
18. Emergency clean water, shower or 75-gallon tank available nearby.	**This was met. Two showers outside plant.**	**Yes**
19. Hoses in good condition.	**NA, as have steel pipelines, not hoses.**	**NA**
20. Hoses no older than 5 years from date of manufacture and marked.	**NA, as have steel pipelines, not hoses.**	**NA**
21. Vapor and liquid hoses are proper ammonia type and free of damage or deterioration.	**NA, as have steel pipelines, not hoses.**	**NA**
		NA

22. Hoses suitably racked to prevent kinking.	**NA, as have steel pipelines, not hoses.**	
23. Hoses, including those on nurse tanks, securely clamped to the nipples.	**NA, as have steel pipelines, not hoses.**	**NA**
24. Gages, pressure and liquid level, operable.	**This was met.**	**Yes**
25. Valves properly labeled “liquid” and “vapor” **.**	**This was met by color coding, red for vapor, purple for liquid.**	**Yes**
26. Safety relief valves within 5 years of manufacture or recertification and marked.	**This was met, as vales were replaced or recertified in 2020.**	**Yes**
27. Outlet openings on valves and lines free of dirt and rust with protective caps in place.	**This was met.**	**Yes**
28. Safety relief valves free of debris with rain caps installed.	**This was met, with rubber caps.**	**Yes**
29. Safety relief valve manifold operable.	**This was met.**	**Yes**
30. Remote shut-off valve in working order.	**This was met, by a remote shut off for each tank at the closest respective “man door” to plant.**	**Yes**

(End of compliance check.)

Emergency engine; MAPC Rule 285(2)(g), 40 CFR Part 60, Subpart IIII:

D. McGeen did not remember the emergency engine during this inspection, but this can be checked during the next inspection here.

Departure:

- Time of departure: The AQD departed the site at 11:53 AM.
- Weather conditions: Sunny, humid, and 72 degrees F, with winds out of the west at 10 mph.
- Odors detected: There was a distinct and definite solvent-like odor from the cleaning of pavement of a truck loading bay at the northeast corner of the plant, but this appeared to be a very temporary situation. The odor did not have the duration, frequency, or intensity to cause unreasonable interference with the comfortable enjoyment of life and property.

Compliance concerns:

None were identified.

Conclusion:

No instances of noncompliance were identified.

NAME  DATE 10/7/2024 SUPERVISOR RB