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

| SRN / ID: N1290 |
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| DISTRICT: Grand Rapids |
| COUNTY: OTTAWA |
| ACTIVITY DATE: 06/25/2015 |
| SOURCE CLASS: MINOR |
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Staff April Lazzaro of the Air Quality Division coordinated an inspection of Holland Terminal Company located at 630 Ottawa Avenue in Holland, MI. The facility is regulated pursuant to Permit to Install No. 395-97C.

The inspection began off-site utilizing a FLIR GF320 infra-red camera for optical gas imaging. Two certified operators for the Department of Environmental Quality (DEQ) ran the camera: Jorge Acevedo, Environmental Engineer and Stafford Dusenbury, Geologist. Also in attendance was Detective Ken Cerny, of the Department of Natural Resources.

The FLIR GF320 specification sheet is attached to this report, which includes the detection levels for specific gasses. On the day of the inspection, at the locations viewed, the FLIR GF320 did not identify emissions at Holland Terminal which were above the detection level. Videos were taken from off-site locations, and are attached to the report on a CD. Due to the fact that the camera is not intrinsically safe, it was not taken on-site to do additional inspections. As such, not every location at the facility that a leak could be present was viewed with the FLIR GF320.

At approximately 11:30 AM, Mike Swan was contacted and informed that a compliance inspection would be conducted at 1:00 PM.

Staff April Lazzaro and Det. Cerny arrived at the facility at 1:00 to conduct an on-site inspection. Staff met with Mike Swan, Owner; Kelly Lappinga, Facilities Maintenance and Jeff Pfost, EPI. Mr. Swan and Mr. Lappinga were provided with a copy of the DEQ Environmental Inspections: Rights and Responsibilities brochure and its contents were briefly discussed.

During the opening conference, staff presented Holland Terminal with the information that a FLIR camera had been used prior to coming on-site and no emissions above the detection level were identified. At that time, Mr. Swan asked AQD staff if he could have a copy of any video taken and he was told that a copy will be provided.

PTI No. 395-97C

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EULOADRACK

The permittee identified that they maintain the instrumentation to automatically start the vapor recover unit if the lifter roof height on EUTANK3 reaches 2/3 of the travel height. AQD review of the Malfunction Abatement Plan (MAP) for the facility, dated June 29, 2012, identified that additional information is needed with regard to the device referred to interchangeably as the "automatic switch", "lifter roof proximity sensor", "proximity switch" and "a.k.a. electric eye" located on Tank 3 which is associated with proper operation of the control system. Rule 911(2) does not appear to be met with regard to the "automatic switch". Due to the fact that the "automatic switch" is integral to the control system at the facility, Holland Terminal shall modify the existing MAP to include inspection and maintenance procedures and replacement parts for the "automatic switch" as well as any other requirement of Rule 911(2). This shall be submitted to the AQD by September 1, 2015. Per Mr. Pfost, the "Photohelix controller" identified in the MAP is present, but is no longer being used.

FGPETROLEUMTANKS

During the inspection of the tanks, AQD, DNR and facility staff consisting of Mr. Lappinga and Mr. Pfost accessed Tank 3 and Tank 6. Other tanks were not accessed due to rain.

As we climbed the ladder of Tank 3, moderate gasoline odors were noted as we passed the seal area of the lifter roof.

No gasoline odors were identified at Tank 6.

FGFACILITY

As indicated in the discussion of the control system identified in EULOADRACK, the AQD is requesting that Holland Terminal update the MAP to include inspections and maintenance procedures, with corresponding recordkeeping for the "automatic switch" located on Tank 3.

Mr. Lappinga provided me with his folder that included his documents describing maintenance activities are required by the current MAP. A random set of documents were requested, and Mr. Lappinga provided copies. (attached)

During the closing meeting, it was identified that Mike Swan and Jack Essenburg are the current owners of Holland Terminal. This was updated in the facility contact information.

Based on the information obtained during the inspection, the facility is in compliance. The AQD will look for submittal of the MAP addressing the "automatic switch", by September 1, 2015.

DATE 7-21-15

SUPERVISOR