

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

N693154841

FACILITY: Tanks R Us		SRN / ID: N6931
LOCATION: 2217 3rd Street, NILES		DISTRICT: Kalamazoo
CITY: NILES		COUNTY: BERRIEN
CONTACT: Kelly Lappinga , Manager		ACTIVITY DATE: 08/21/2020
STAFF: Matthew Deskins	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: This was an announced scheduled inspection due to the COVID-19 Pandemic along with the fact that the facility is not manned operation.		
RESOLVED COMPLAINTS:		

On August 21, 2020 AQD Staff (Matt Deskins) went to conduct an announced scheduled inspection of the Tanks-R-Us (N6931) facility located in Niles, Berrien County. The inspection had to be scheduled due to the Covid-19 Pandemic and the fact that the facility is not "manned". According to district file information, the facility is a true minor source with only one active air permit (PTI No. 348-00A) with the AQD for a 2.772 million gallon storage tank. They are also subject 40 CFR Part 60 Subpart Kb (NSPS for Volatile Organic Liquid Storage Vessels) and those conditions are contained within the PTI. Lastly, the facility is also subject to 40 CFR Part 63 Subpart BBBBBB (NESHAP for Gasoline Distribution Bulk Terminals, Bulk Plants, and Pipeline Facilities at area sources) that took effect in 2008; however, the AQD is not currently delegated by the EPA to enforce that regulation so no compliance determination will be made with regards to it. The intent of staff's inspection will be to determine compliance with their air permit along with the NSPS Kb. Staff's inspection was scheduled for 10:30 a.m. so staff departed the district office at approximately 8:55 a.m.

Staff arrived at the facility at approximately 10:15 a.m. and noted that the gate was unlocked and open. Staff proceeded to drive along what appeared to be the secondary containment dike which also served as the perimeter/access road. Staff then observed a couple of vehicles parked near a storage shed and proceeded to that area. Upon exiting the vehicle staff introduced them self to Kelly Lappinga (Manager for Tanks R Us) and Phil Vander Werf who is their electrical contractor and gave them his business card.

As noted in the introduction, there is not much to the facility outside of the storage tank itself and the following is a brief summary of staff's discussion with Kelly and Phil.

According to Kelly, the tank is still the same one that was permitted back in 2000 and is the same size (2.772 million gallons). The tank is equipped with an internal floating roof that staff later verified and doesn't have a control panel or anything. Kelly then mentioned and Phil later verified that that it had its last ASTM internal inspection back in in 2011. According to Kelly, the tank is what is called a breakout tank in the petroleum industry where it has a 16" line coming into it and 8" line going out. He said that all petroleum products out of Chicago have to come through the Niles terminal(s) before heading north. The product that comes into their tank is considered a base product (84 Octane) and will later get ethanol and possibly other additives added to it at other facilities to make it at a minimum of 87 Octane. Staff then asked about the various records required to be kept by the permit and Kelly mentioned that Environmental Partners handles all their compliance reporting and that he would have Bruce Connell e-mail staff everything that staff would need to see. Staff later received the records on ~~???~~ and the following lists special conditions of PTI No. 349-00A and staff's comments regarding them. 8/26/20 RIL

SPECIAL CONDITIONS OF PTI No. 348-00A

EMISSION UNIT SUMMARY TABLE

The descriptions provided below are for informational purposes and do not constitute enforceable conditions.

Emission Unit ID	Emission Unit Description	Installation Date /	Flexible Group ID
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	(Process Equipment & Control Devices)	Modification Date	
EUSTORAGETANK	A vertical storage tank with the storage capacity of 2,772,000 gallons equipped with an internal floating roof with a mechanical shoe seal	August 2001	NA
Changes to the equipment described in this table are subject to the requirements of R 336.1201, except as allowed by R 336.1278 to R 336.1290.			

The following conditions apply to:
EUSTORAGETANK

DESCRIPTION: A vertical storage tank with the storage capacity of 2,772,000 gallons equipped with an internal floating roof with a mechanical shoe seal

POLLUTION CONTROL EQUIPMENT: Internal floating roof with mechanical shoe seal

I. EMISSION LIMITS

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Testing / Monitoring Method	Underlying Applicable Requirements
1. VOC	3,138 pounds per year	12-month rolling time period as determined at the end of each calendar month	EUSTORAGETANK	SC VI.2	R 336.1205(3) R 336.1702(a)

AQD Comment: Appears to be in Compliance with the above. Records reviewed by staff indicate emissions at 2,232 pounds for the most recent 12-Month Rolling Time Period ending in July 2020. (See Attached Spreadsheet)

II. MATERIAL LIMITS

Material	Limit	Time Period / Operating Scenario	Equipment	Testing / Monitoring Method	Underlying Applicable Requirements
1. Gasoline	283.8 million gallons per year	12-month rolling time period as determined at the end of each calendar month	EUSTORAGETANK	SC VI.1	R 336.1205(3) R 336.1702(a)

AQD Comment: Appears to be in Compliance with the above. Records reviewed by staff indicate throughputs at 111,234,270 for the most recent 12-Month Rolling Time Period ending in July 2020. It doesn't appear from looking at the last couple of year of data that they've even come close to the permit limit. (See Attached Spreadsheet)

IV. DESIGN/EQUIPMENT PARAMETERS

- The permittee shall comply with all design provisions of the Federal Standards of Performance for New Stationary Sources as specified in 40 CFR Part 60 Subparts A and Kb, as they apply to EUSTORAGETANK. The provisions of 40 CFR Part 60 Subpart Kb include, but are not limited to,

equipping EUSTORAGETANK as follows: (40 CFR Part 60 Subparts A & Kb, 40 CFR 63.11087)

- a. Each internal floating roof shall be equipped with one of the following closure devices between the wall of the storage vessel and the edge of the internal floating roof: (40 CFR 60.112b(a)(1)(ii))
 - i. A mechanical shoe seal. A mechanical shoe seal is a metal sheet held vertically against the wall of the storage vessel by springs or weighted levers and is connected by braces to the floating roof. A flexible coated fabric (envelope) spans the annular space between the metal sheet and the floating roof.

AQD Comment: Appears to be in Compliance with the above. The tank equipped with an IFR along with a mechanical shoe seal.

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. (R 336.1201(3))

1. The permittee shall keep records of the EUSTORAGETANK throughput of gasoline for each calendar month and 12-month rolling time period. The permittee shall keep all records on file at the facility and make them available to the Department upon request. (R 336.205(3), R 336.1702(a))

AQD Comment: Appears to be in Compliance with the above. (See Attached Spreadsheet)

2. The permittee shall keep, in a satisfactory manner, monthly and 12-month rolling time period records of VOC emissions calculations for EUSTORAGETANK. The permittee shall keep all records on file for a period of at least five years and make them available to the Department upon request. (R 336.1205(3), R 336.1702(a))

AQD Comment: Appears to be in Compliance with the above. (See Attached Spreadsheet)

3. The permittee shall perform inspections and monitor operating information for EUSTORAGETANK as required by §60.113b. These requirements include, but are not limited to, the following: (R 336.1205(3), R 336.1225, R 336.1702(b), R 336.1910, 40 CFR Part 60 Subparts A & Kb):

- a. For Vessels equipped with a liquid-mounted or mechanical shoe primary seal, visually inspect the internal floating roof and the primary seal or the secondary seal (if one is in service) through manholes and roof hatches on the fixed roof at least once every 12 months after initial fill. If the internal floating roof is not resting on the surface of the VOL inside the storage vessel, or there is liquid accumulated on the roof, or the seal is detached, or there are holes or tears in the seal fabric, the owner or operator shall repair the items or empty and remove the storage vessel from service within 45 days. If a failure that is detected during inspections required in this paragraph cannot be repaired within 45 days and if the vessel cannot be emptied within 45 days, a 30-day extension may be requested from the Administrator in the inspection report required in §60.115b(a)(3). Such a request for an extension must document that alternate storage capacity is unavailable and specify a schedule of actions the company will take that will assure that the control equipment will be repaired or the vessel will be emptied as soon as possible. (40 CFR 60.113(b)(a)(2))

AQD Comment: Appears to be in Compliance with the above. (See Attached Tank Inspection Report)

4. The owner or operator of each storage vessel as specified in §60.110b(a) shall keep readily accessible records showing the dimension of the storage vessel and an analysis showing the capacity of the storage vessel. (40 CFR 60.116b(b))

AQD Comment: Appears to be in Compliance with the above.

5. The permittee shall monitor emissions and operating information for EUSTORAGETANK in accordance with the federal Standards of Performance for New Stationary Sources as specified in 40 CFR Part 60 Subpart Kb. The permittee shall keep records of all source emissions data and operating information on file on-site and make them available to the Department upon request. (R 336.1702(a), 40 CFR 60 Subpart Kb)

AQD Comment: Appears to be in Compliance with the above.

VII. REPORTING

1. The permittee shall notify the Department in writing at least 30 days prior to the filling or refilling of each storage vessel for which an inspection is required by paragraphs (a)(1) and (a)(4) of §60.113b to afford the Administrator the opportunity to have an observer present. If the inspection required by paragraph (a)(4) of §60.113b is not planned and the owner or operator could not have known about the inspection 30 days in advance or refilling the tank, the owner or operator shall notify the Administrator at least 7 days prior to the refilling of the storage vessel. Notification shall be made by telephone immediately followed by written documentation demonstrating why the inspection was unplanned. Alternatively, this notification including the written documentation may be made in writing and sent by express mail so that it is received by the Administrator at least 7 days prior to the refilling. (40 CFR 60.113b(a)(5))

AQD Comment: Appears to be in Compliance with the above. The facility has been submitting these.

IX. OTHER REQUIREMENTS

1. The permittee shall comply with all applicable provisions of the Standards of Performance for New Stationary Sources, as specified in 40 CFR, Part 60, Subpart A and Subpart Kb, as they apply to EUSTORAGETANK. (40 CFR Part 60, Subparts A and Kb)

AQD Comment: Appears to be in Compliance with the NSPS Subparts A and Kb.

2. The permittee shall comply with all applicable provisions of the Standards of Performance for Source Category: Gasoline Distribution Bulk Terminals, Bulk Plants, and Pipeline Facilities, as specified in 40 CFR Part 63, Subpart A and Subpart BBBBBB, as they apply to EUSTORAGETANK. (40 CFR 63, Subparts A and BBBBBB)

AQD Comment: Staff did not make a compliance determination with regards to the NESHAP BBBBBB since the AQD currently isn't delegated by the EPA to enforce it at area sources of HAPs. However, the facility has been submitting annual reports to the AQD.

INSPECTION CONCLUSION: The facility appears to be in Compliance with the Special Conditions contained in PTI No. 348-00A along with the NSPS Kb. As just mentioned above, staff did not make a compliance determination with regards to the NESHAP BBBBBB since the AQD isn't currently delegated by the EPA to enforce it area sources of HAPs. However, the facility has been submitting annual reports to the AQD.

NAME Matt Deskin

DATE 9-3-20

SUPERVISOR RL 9/9/20