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DEPARTMENT OF ENVIRONMENTAL QUALITY AIR QUALITY DIVISION

ACTIVITY REPORT: Self Initiated Inspection

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FACILITY: Owens Petroleum		SRN / ID: B6856
LOCATION: 408 N. Albion, ALBION		DISTRICT: Kalamazoo
CITY: ALBION		COUNTY: CALHOUN
CONTACT: Randy Purucker , President		ACTIVITY DATE: 11/13/2013
STAFF: Rex Lane	COMPLIANCE STATUS: Compliance	SOURCE CLASS:
SUBJECT: Self-Initiated Ins	pection	
RESOLVED COMPLAINTS	:	

On November 13, 2013, Air Quality Division (AQD) staff (Rex Lane) arrived at Owens Petroleum, Inc. (OPI) located at 408 North Albion Street, Albion, Michigan at 12:45 p.m. to conduct an unannounced air quality inspection. The facility was last inspected by the AQD in March 2002 and was determined to be compliant at that time. Staff made initial contact with the office receptionist and was directed to the office of Mr. Randy Purucker, OPI, President. Staff stated that they would like to conduct an air quality inspection of the facility and provided Mr. Purucker with their inspector credentials, a business card and a copy of MDEQ's Environmental Inspections brochure.

Staff asked Mr. Purucker for some general facility information and he indicated that the facility commenced operation in 1975 and that they are currently open on weekdays from 8 to 5 pm. Staff then showed Mr. Purucker a copy of the above ground storage tank (AST) farm inventory from the 2002 inspection (see table below) and asked if there had been any changes since the last inspection.

2002 Tank Inventory Table (2013 Updates Included):

Tank ID	Type of Fuel Stored	Capacity (gallons)
1	# 2 fuel oil	20,304
2	Unleaded gasoline	20,304
3	Mid-grade gasoline (tank replaced in 2005)	20,304
4	Off-road diesel	10,211
5	# 1 Dyed Kerosene	11,897
6	Dyed High Sulfur Diesel	10,592
7	# 2 fuel oil	17,229

Mr. Purucker said that Tank # 3 was replaced in 2005 and placed on top of a concrete slab and that electronic overfill alarms were installed on all seven tanks in 2009. Per Mr. Purucker, all seven ASTs have fiberglass liners inside them one-half way up the tank sides and are located inside a diked area with a clay liner. The seven ASTs have fixed roofs with conservation vents, are painted white (in good condition), and have been equipped with bottom fill pipes. Staff asked Mr. Purucker about the fill pipes and he said that when empty, the tanks still have 8 – 9" of liquid product depth. Therefore, the fill pipe bottom is less than 12" from the bottom of each tank. Staff asked what the estimated monthly gasoline throughput was for the facility (AST plus UST detailed below) and he said between 10,000 and 100,000 gallons. The ASTs that contain diesel fuel, fuel oil or kerosene are exempt from air use permitting requirements under Rule 284(d). The ASTs that contain gasoline are exempt from air use permitting requirements under Rule 284(g)(i).

The facility appears to be exempt from the federal Standards of Performance for Volatile Organic Liquid Storage Vessels (40 CFR Part 60, Subpart Kb) based on the type of liquid stored, tank installation date prior to 7/23/84, tank capacity or per exemption under 40 CFR 60.110b(d)(6) for storage vessels located at gasoline service station defined as any site where gasoline is dispensed to motor vehicle fill tanks from stationary storage vessels.

Based on monthly gasoline throughput, the facility appears to be subject to the federal area source MACT standard for gasoline distribution or gasoline dispensing facilities (40 CFR Part 63, Subpart CCCCC). Staff did not evaluate compliance with 40 CFR Part 63, Subpart CCCCCC because the AQD has not taken over delegation for this federal regulation. Staff did provide Mr. Purucker with a copy of the federal regulation, a Q & A document, and a general information pamphlet and initial notification form developed by MDEQ's Office of

Environmental Assistance. Staff encouraged Mr. Purucker to review the documents and determine if the facility is subject to the area source MACT standard.

In 2005, the facility installed an 8,000 gallon underground storage tank (UST) with four 2,000 gallon compartments. On-road and off-road diesel, unleaded and mid-grade gasoline is stored in the individual compartments. The UST is exempt from air use permitting requirements under Rule 284(g)(i).

In 2011, the facility installed one- 30,000 gallon propane AST. Propane tanks with a capacity of less than 40,000 gallons are exempt from air use permitting requirements under Rule 284(b).

We did a quick tour of the facility property and staff asked what was in each of the outbuildings to the east of the propane tank. The easternmost building contains multiple ASTs that store miscellaneous lube and thermal oils and the tank dispensers are equipped with drip trays. These ASTs are exempt from air use permitting requirements under Rule 284(c). The other outbuildings were either vacant or used to store propane delivery vehicles.

Staff thanked Mr. Purucker for his time and left the facility at 1:30 pm. At the time of the inspection, the facility appeared to be in compliance with all state air quality regulations. -RIL

NAME Ker J. Lane

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