

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: Self Initiated Inspection

P036445545

FACILITY: CRYSTAL FLASH - CORPORATE OFFICE		SRN / ID: P0364
LOCATION: 1754 ALPINE AVE NW, GRAND RAPIDS		DISTRICT: Grand Rapids
CITY: GRAND RAPIDS		COUNTY: KENT
CONTACT: John Wozniak , Plant & Environmental Safety Manager		ACTIVITY DATE: 08/10/2018
STAFF: Adam Shaffer	COMPLIANCE STATUS: Compliance	SOURCE CLASS:
SUBJECT: Self initiated inspection.		
RESOLVED COMPLAINTS:		

Air Quality Division (AQD) staff Adam Shaffer (AS) arrived at the facility at 10:39 am on August 10, 2018 to complete a self-initiated inspection. The weather conditions were sunny, winds from the east at 10-15mph and middle 70's°F.

Facility Description

Crystal Flash (CF) located in Grand Rapids, MI, is a fuel distribution company, with the site also being the corporate office location. The Grand Rapids, MI facility has one active general permit to install (PTI) No. 481-99 for two soil vapor extraction (SVE) systems. The layout for the property identified as 1760 Alpine Avenue NW consists of the gas station and associated convenience store. The property is owned by CF, but the convenience store is not operated by them. The parcel identified as 1754 Alpine Avenue NW is owned and operated by CF with the layout consisting of the corporate building, garage building, and loading station structure.

Compliance Evaluation

Prior to entering the facility, offsite odors and visible emissions observations were conducted. No odors or visible emissions were observed coming from the facility. Upon entering the facility, AQD staff AS met with Ms. Kathryn Stivers, Safety Administrator. Ms. Stivers provided a tour of the facility, helped answer site specific questions and provided requested data. The primary contact for the CF site is Mr. John Wozniak, Plant & Environmental Safety Manager, who was contacted following the site inspection for any remaining information.

PTI No. 481-99

PTI No. 481-99 was originally issued on December 21, 1999 with a modification for an additional air sparging system to be included on August 5, 2008. The soil vapor extraction (SVE) systems are for remediation that is located around the bulk terminal and at the convenience store. During the previous inspection on May 26, 2010, it was concluded that the SVE system for the bulk terminal remediation has been offline since 2004 and the store remediation SVE system has been off since May 31, 2010 due to a lighting strike. It was stated by Mr. Wozniak that the two SVE systems have not been in use since 2010. The SVE system near the bulk terminal had been dismantled and the parts were in a storage structure onsite. The remaining SVE system was dismantled following the inspection. Based on the two SVE systems no longer in operation on site, PTI No. 481-99 shall be voided.

Corporate Building

This structure consists of various offices and associated areas and is located on the western portions of the site.

Loading Station Building

This structure is used for loading of trucks with select fuels prior to being sent off site and is located centrally within the site.

- Several aboveground storage tanks (ASTs) containing diesel, gasoline and an additive were observed ranging in size up to approximately 1,000 gallons. A Safety Data Sheet (SDS) for the additive was requested and provided. The ASTs containing diesel, gasoline and the additive appear to be exempt per Rule 284(2)(g)(i) and Rule 284(2)(g)(ii).

Garage Building

This structure is used for maintenance and storage purposes. It was stated by CF staff that no major maintenance is completed for trucks on site.

- One parts washer was observed in the garage structure. The lid was open at the time of the inspection and an operating procedure label was observed. AQD staff AS reminded CF staff on keeping the lid closed when not in operation. The parts washer was less than 10 square feet in size and appears to be exempt per Rule 281(2)(h).
- Various storage containers were observed containing materials including motor oil, methanol and BlueDEF diesel exhaust fluid. The materials observed appear to be exempt per Rules 284(2)(c), 284(2)(n), and Rule 284(2)(g)(i) / Rule 284(2)(g)(ii) respectively.

Additional Observations

- The convenience store and associated gas station have ten underground storage tanks (USTs) ranging in size from 550 gallons to 12,000 gallons and containing kerosene, diesel, and various gasoline grades. The tanks appear to be exempt per Rule 284(2)(g)(ii).
- Large numbers of propane tanks ranging in size up to 500 gallons were observed along the eastern portions of the site. Additionally, one 30,000 gallon propane tank was observed. The propane tanks observed appear to be exempt per Rule 284(2)(b).
- Located adjacent to the loading station building is a tank farm containing tanks ranging in size up to 105,000 gallons and containing additives, diesel and gasoline. The tank farm appears to be exempt per Rule 284(2)(g)(i) and Rule 284(2)(g)(ii).

Additional Regulations

Following the site inspection, it was concluded that CF is considered a loading and dispensing facility. A phone conversation was held between CF staff Mr. Wozniak and AQD staff AS on September 10, 2018. During the conversation, it was concluded that loading and dispensing operations on site were installed post 1980 and, therefore, are subject to MDEQ Part 7 Air Pollution Control Rules, Emission Limitations and Prohibitions – New Sources of Volatile Organic Compound Emissions, specifically, Rules 703 – 705. Specifics for all gasoline tanks such as having submerged fill pipes, vapor balance systems, and vapor tight collection lines were discussed at length. After further review, it appears that CF is in compliance with MDEQ Part 7 Air Pollution Control Rules.

Based on the size of the tanks on site the facility is potentially subject to 40 CFR Part 60 Subpart Kb – Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984. However, after further review, it was concluded CF is not subject to 40 CFR Part 60 Subpart Kb based on 60.11b(b)(d)(4) - Vessels with a design capacity less than or equal to 1,589.874 m³ used for petroleum or condensate stored, processed, or treated prior to custody transfer.

CF is potentially subject to 40 CFR Part 60 Subpart CCCCC – Nation Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Dispensing Facilities. However, the MDEQ AQD does not have delegation for this federal regulation; therefore, it was not evaluated for compliance.

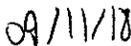
Conclusion

Based on the facility walkthrough, observations made, and items received, CF appears to be in compliance with applicable air quality rules at this time.

NAME



DATE



SUPERVISOR

