

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

B921525156

FACILITY: COUSINS PETROLEUM		SRN / ID: B9215
LOCATION: 7965 HOLLAND TRAIL RD, TAYLOR		DISTRICT: Detroit
CITY: TAYLOR		COUNTY: WAYNE
CONTACT: Joanne Robinson , Owner		ACTIVITY DATE: 05/08/2014
STAFF: Katherine Koster	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: FY2014 Targeted Inspection		
RESOLVED COMPLAINTS:		

REASON FOR INSPECTION: Targeted Inspection

INSPECTED BY: Katie Koster, AQD

PERSONNEL PRESENT: Earl Henley, Fuel Tester

FACILITY PHONE NUMBER: 313-291-1700

FACILITY FAX NUMBER: 248-559-1861

FACILITY BACKGROUND

Cousins Petroleum is a bulk gasoline terminal previously owned by Martin Oil Company located in Taylor, MI. However, the facility no longer receives petroleum products from the pipeline. The tanks have been disconnected from the pipeline, and the loading rack has not been used in the last five years. Currently, tanks either store a spent water propylene glycol mixture that was used by the DTW airport for deicing or they are empty.

COMPLAINT/COMPLIANCE HISTORY

No complaints have been received against this facility.

Facility was previously inspected by AQD in 2011. According to information in the facility file, the facility was determined to be a major source of volatile organic compounds (VOC's) by Wayne County Air Pollution Control. The facility was notified in 1995 by Wayne County to submit a Renewable Operating Permit (ROP) application. However, an administratively complete application was never received. As a result, the facility was referred to the Wayne County enforcement unit and legal counsel in 1997 (letters attached as Appendix A). However, AQD staff could not find any indication that the referral was pursued.

Facility obtained an opt out permit in response to the 2005 AQD inspection and violation notice (PTI 345-05).

OUTSTANDING CONSENT ORDERS

None

OUTSTANDING LOVs

None

INSPECTION NARRATIVE

On May 8, 2014, AQD inspector, Katie Koster, arrived at Cousins Petroleum at approximately 1:00 p.m. I met with Mr. Earl Henley, fuel tester, in the control room and he accompanied me about the facility.

We discussed the facility operations which have not changed since the prior inspection. The facility no longer receives any products from the pipeline. All tanks are disconnected from the pipeline and Mr. Henley showed me the physical location where the piping had been disconnected.

There are five storage tanks on site:

MACES- Activity Report

Tank 1 – Constructed in the 1960's and installed a floating roof in 1988. 55,000 barrel capacity (2.3MM gallons). Initially used to store unleaded gasoline. Empty.

Tank 2 – Constructed in the 1960's and installed a floating roof in 1988. 55,000 barrel capacity. Initially used to store premium unleaded. Empty.

Tank 3 – Constructed in the 1960's and installed a floating roof in 1988. 80,000 barrel capacity (3.4MM gallons). Now stores a spent mixture of water/glycol that was used for de-icing planes.

Tank 4 – Constructed in 1988 with a fixed roof. 30,000 gallon capacity. Empty.

Tank 5 – Constructed in 1988 with a fixed roof. 30,000 gallon capacity. Empty.

All tank exteriors appeared to be in fair condition. I did not observe any signs of leakage. Tanks are surrounded by a gravel berm to contain leaks and spills. An underground collection system transports any surface water present via underground piping to a three stage oil water separator.

An empty 5000 gallon horizontal storage tank is located north of Tank 1 and used to store additives which used to be mixed into the gasoline during loading.

We walked to the loading rack which Mr. Henley stated has not been used for a long time. Hoses at the loading rack were missing attachments that would be needed for loading.

As stated above, Tank 3 contains a spent water/propylene glycol mixture; about 2 million gallons presently. The mixture is a maximum of 20% glycol with the remainder being water. The mixture is collected by EQ for further off site processing at one of their facilities. However, they do not have the capacity to store all of the mixture at one time so Cousins Petroleum is a holding facility for EQ. Tankers operated by MyWay trucking load the tank during the winter when the deicing fluid is being used at the airport and begin draining the tank in the spring and summer months for off site processing. Each load that they take is about 10,000 gallons. This does not occur at the loading rack. Flexible hoses from the tanker are used. I inspected the flexible hose and it appeared to be in good condition. Mr. Henley estimated that it will take about 3 months to drain the tank.

We returned to the office and Mr. Henley presented the recent receipts for the recent removal of the water/glycol mixture; each load was listed as being 10,000 gallons.

APPLICABLE RULES/PERMIT CONDITIONS

Since the facility is not storing gasoline, ethanol, or any other petroleum products at this time, there is no need to evaluate PTI 345-05 conditions or other state and federal regulations pertaining to gasoline storage and distribution.

The storage of water/glycol mixture in the tanks appears to meet the exemption criteria for Rule 285(b): "Changes in a process or process equipment which do not involve installing, constructing, or reconstructing an emission unit and which do not involve any meaningful change in the quality and nature or any meaningful increase in the quantity of the emission of an air contaminant therefrom."

The nature of emissions are similar (volatile organic compounds), toxicity of emissions are less for propylene glycol (ITSL = 6000 ug/m³) than gasoline emissions (IRSL = 2 ug/m³) which contains numerous HAPs, and the volatility of the deicing mixture of which the majority is water is far less than the volatility of gasoline which is 100% by weight. This results in a significantly lower quantity of VOC emissions.

APPLICABLE FUGITIVE DUST CONTROL PLAN CONDITIONS

There is a gravel lot leading into the main office of the facility. I did not notice a fugitive dust problem at the time of the inspection nor has AQD received any fugitive dust complaints against this facility.

FINAL COMPLIANCE DETERMINATION

At the time of the inspection, facility appears to be in exempt from Rule 201 based on current operation. Therefore, status of compliance was chosen.

NAME Kate Kye

DATE 5/19/14

SUPERVISOR W.M.