DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: On-site Inspection

N129059145

FACILITY: Holland Terminal Company		**SRN / ID:** N1290
LOCATION: 630 OTTAWA AVE, HOLLAND		**DISTRICT:** Grand Rapids
CITY: HOLLAND		**COUNTY:** OTTAWA
CONTACT: Kelly Lappinga , Owner		**ACTIVITY DATE:** 06/30/2021
STAFF: Kaitlyn DeVries	**COMPLIANCE STATUS:** Compliance	**SOURCE CLASS:** MINOR
SUBJECT: The purpose of this inspection was to determine compliance with the provisions of permit to install (PTI) No. 395-97F and other applicable air quality rules and regulations.		
RESOLVED COMPLAINTS:		

On Wednesday June 30, 2021, Department of Environment, Great Lakes, and Energy (EGLE) Air Quality Division (AQD) Staff Kaitlyn DeVries (KD) and Remediation and Redevelopment Division (RRD) Staff Chris Christensen conducted an unannounced, scheduled inspection of Holland Terminal Company located at 630 Ottawa Ave, Holland Michigan. The purpose of this inspection was to determine compliance with the provisions of permit to install (PTI) No. 395-97F and other applicable air quality rules and regulations. This inspection was done with joint EGLE staff for cross-training purposes.

KD and CC arrived on site around 9:00 am. Prior to arriving on site, the area surrounding the facility was observed for any excess odors or opacity. None were noted. Upon arriving on site, EGLE staff met with Mr. Kelly Lappinga, Owner, who called Mr. Jeff Pfost from Environmental Partners, Inc., the consultant for the facility. Once Mr. Pfost arrived on site, EGLE Staff, Mr. Lappinga, and Mr. Pfost discussed the purpose of the inspection and discussed any changes at the facility prior to being escorted by Mr. Pfost on a walk through the site. Proper PPE and social distancing were maintained.

Facility Description

Holland Terminal Company (HTC) is a bulk petroleum products storage and distribution facility. The facility receives product from the Wolverine Pipeline where it stores the petroleum in above ground storage tanks. The facility also distributes the petroleum by way of a distribution loading rack, used to load tanker trucks. The facility can operate 24 hours per day, 365 days per year.

Regulatory Analysis

HTC is a minor source of criteria pollutants and hazardous air pollutants (HAPs) and is currently operating under PTI No. 395-97F. The content of this permit will be discussed further in the Compliance Evaluation portion of this report (see below). In addition to the PTI, HTC is subject to the provisions of 40 CFR Part 63 Subpart BBBBBB the National Emissions Standards for Hazardous Air Pollutants for Gasoline Distribution Bulk Terminals, Bulk Plants, and Pipeline Facilities as an area source. The AQD, however, does not have delegation for this Federal Regulation; therefore, it will not be further evaluated.

Compliance Evaluation

EULOADRACK

This emission unit is for the loading rack for loading of tank trucks. The pumps that load the trucks have a maximum rate of 650 gallons per minute (gpm), each. The loading rack is

controlled by a vapor balance and/or vapor recovery unit. During the opening meeting, it was noted that HTC had replaced the Vapor Recovery Unit (VRU) that is used on site. The replacement of the VRU was done under Rule 201 permitting exemption Rule 285(2)(d). Per Mr. Lappinga, the new VRU was placed into service on March 30, 2021. This emission unit is required to have a Malfunction Abatement Plan (MAP), and HTC is required to implement and maintain that MAP. KD asked if the existing MAP that AQD had, dated June 2012, was the most up-to-date version. Mr. Pfost indicated that the MAP would need to be updated, and they were working out some final details of the MAP. Mr. Pfost indicated to KD that an updated MAP would be submitted to the AQD by August 1, 2021. KD will follow up with HTC to ensure the updated MAP is submitted. As part of the existing MAP, HTC supplied KD with records of the preventative maintenance that is conducted. The records indicate HTC is routinely conducting preventative maintenance, as outlined in the MAP.

KD watched a few trucks get loaded with petroleum and was able to see the vapor tight collection line and did not notice any odors while the trucks were loading. Tank 3 (EUTANK3) is equipped with a lifter roof with instrumentation to automatically start the VRU if the lifter roof height reaches two-thirds (2/3) of the travel height.

EUHORIZAST1

This emission unit is the new horizontal above ground storage tank, tank #1. This tank is a 13,800-gallon tank for emergency breakouts and was installed in 2017. The tank is equipped with a conservation vent to minimize breathing losses. HTC is required to keep records of the monthly throughput for this tank. This tank was not used in 2020 or 2021.

This emission unit also requires a MAP, and as previously mentioned HTC will be supplying an updated version. HTC is conducting preventative maintenance, as per the existing MAP.

FGPETROLEUMTANKS

This flexible group is comprised of several fixed roof tanks for storing organic compounds. Vapor balance and/or vapor recovery units for the tanks in gasoline service are used to control emissions from these tanks. These tanks can store a variety of compounds including petroleum and petroleum additives. EUTANK7 is only permitted to store fuel oil in that tank. The contents of these tanks all are required to have a true vapor pressure of not more than 1.5 psia, unless all the provisions of Rule 604 are met. Gasoline, diesel, and various additives that are unique and specific to the different where the fuel is going to be delivered were housed in each of the tanks at the time of the inspection.

HTC is tracking throughput for the tanks on site as well as compiling emissions data. Benzene emissions from the site were 0.22 tons per 12 month rolling time period as of May 2021. Similarly, Volatile Organic Compound (VOC) emissions from the site were 8.55 tons per 12 month rolling time period as of May 2021.

Miscellaneous

Per the site walk through and a discussion with Mr. Pfost, HTC does not have any cold cleaners, boilers, or generators.

It was noted on this inspection that HTC had an overfill incident on November 11, 2020 resulting in 630 gallons onto the ground and subsuently evaporating into the air. EGLE staff was able to see the area where this over-fill event occurred. HTC had a third party on site on the day of the inspection doing some additional remediation of the soil. Odors were noted near the trucks that were in use for the remediation and the sample wells being pumped. The odors were fleeting and dissipated quickly when EGLE staff left that area. HTC accounted for this overfill incident in its emission reporting.

Compliance Determination

Based upon the observations made during the inspection and a subsequent review of the records, it appears that Holland Terminal Company is in compliance with PTI No. 395-97F and other applicable Air Quality Rules and Regulations.

NAME Kaitlyn Davis DATE 7/20/2021 SUPERVISOR HH