

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

N329946009

FACILITY: General Devices & Fittings		SRN / ID: N3299
LOCATION: 107 East Oak Street, LELAND		DISTRICT: Cadillac
CITY: LELAND		COUNTY: LEELANAU
CONTACT:		ACTIVITY DATE: 09/06/2018
STAFF: Caryn Owens	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: Scheduled inspection and records review		
RESOLVED COMPLAINTS:		

**On Thursdays, August 2, 2018 and September 6, 2018, Ms. Caryn E. Owens of the DEQ-AQD conducted a scheduled inspection of General Devices located at 107 East Oak Street in Leland, Leelanau County, Michigan (SRN: N3299). The purpose of the field inspection and records review is to determine compliance with Permit to install (PTI) 1229-91. The site is currently a minor source, and not subject to Federal Regulations.**

### Evaluation Summary

Based on the activities covered during this field inspection, the facility appears to be in compliance with PTI 1229-91; however, there are activities that need to be conducted prior to operating the waste oil burner again. The onsite used oil would need to have an oil analysis completed prior to burning in the waste oil burner and the stack repaired. If the waste oil burner is no longer used in the future, AQD recommends properly disposing the onsite used oil from the Property.

### On-site Inspection:

During the field inspection on August 2, 2018, it was partly cloudy and approximately 75°F, with calm winds from the north. The site consisted of three buildings. Two of them were used as storage units, and the main building on the western portion of the exterior of the site appeared to be used for General Devices and Welding. During the inspection, the site was really run down with a lot of overgrown vegetation covering miscellaneous debris that consisted of but not limited to boat parts, metal bars, concrete pieces, an old dishwasher, tires, etc.

A metal stack that was all rusted was coming out of the eastern portion of the western-most building. The stack was approximately 15 feet above ground surface. No visible emissions or odors were present during the inspection. There was formerly a natural gas meter on the northwestern corner of the western-most building, but the meter has been removed and the piping is still connected. There was a sign at the top of the western building that said, "General Devices and Welding, 231-256-7915", which was the same phone number on the Storage Units signs that said, "Leland Storage Units Available". I attempted to call the number and received an answering machine. I left a message, as of the end of the week, August 3<sup>rd</sup>, have not received a response from the number. On Monday, August 6, 2018 I mailed a certified letter to the Property Owner requesting to meet me at the site for an inspection.

I received a call from Ms. Susan Lederle, and she was speaking on behalf of her husband, the Property owner. Ms. Lederle said that the waste oil burner will not be used and if they need it in the future they will switch it to natural gas, and that there was no need for an inspection. I attempted to let Ms. Lederle know that an inspection of the waste oil burner is necessary since they have an active permit, but I was unable to discuss this with her before she hung up.

On August 20, 2018 I submitted another certified letter explaining why an inspection was necessary for the site, and that I would be at the site on September 6, 2018 for an inspection and would need a representative of the Property to meet me there to get into the building.

On September 6, 2018, Ms. Holly Pennoni of the EIS-DEQ and myself met with Nicholas Lederle and Dudley Matthews for an onsite inspection. The inside of the building appeared to be a maintenance garage and was clean and organized. The waste oil burner was homemade by Mr. Lederle in 1973, and constructed of 12 grade steel, lined with firebricks in the combustion chamber. On the southern portion of the waste oil burner the oil is atomized using compressed air, that is combusted in the heating chamber. According to Mr. Lederle, the heat content of the burner is not known since it is homemade unit. Additionally, there were two 275-gallon storage tanks on shelves above the burner, and one approximately 200-gallon storage tank on the ground below the waste oil burner, which is the main feed to the waste oil burner. According to Mr. Lederle, there is approximately

400 gallons of used oil still onsite that has been collected from changing boat oil, but he is pretty much shut down at this time due to retirement and health reasons and has not operated the waste oil burner in at least 4 years. Mr. Lederle also indicated that he has stopped using the waste oil burner because a portion of the stack was deteriorated and has fallen and would need to be repaired prior to using the waste oil burner again.

**PTI Compliance Evaluation:**

**Emission Limits:**

During the inspection, the waste oil burner was not operating. Therefore, no visible emissions were observed.

**Material Limits:**

The permittee shall not fire the waste oil burner with any fuel other than distillate fuel oil or waste oil generated onsite. Additionally, all used oil shall be pretreated to reduce water and sediment being burned in the furnace. According to Mr. Lederle, some of the oil that is currently stored onsite has been brought to his site from changing oil on cars and/or boats. AQD recommends properly disposing this waste oil or performing an oil analysis prior to using it in the oil burner in the future.

**Process/Operational Restrictions:**

The permittee shall not exceed the maximum heat rate designed for the furnace. As previously stated, the heat rate is not known for this waste oil burner, but it was operated as designed.

**Design/Equipment Parameters and Testing/Sampling:** There are no applicable design/equipment parameters applicable at this time. Since this PTI has been issued, AQD has not requested stack testing or sampling at this facility.

**Monitoring/Recordkeeping or Reporting:**

There are no monitoring, recordkeeping, or reporting requirements associated with this PTI.

**Stack Restrictions**

During the field inspection, the stack appeared to be approximately 15 feet above ground surface. The stack appeared to be deteriorating at the top of it, and according to Mr. Lederle, the top of the stack fell off and would need to be repaired before he is able to operate the waste oil burner again.

**Other Requirements:**

No other requirements are associated with the waste oil burner.





NAME Chym Chens

DATE 9/6/18

SUPERVISOR SN