

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION

FCE Summary Report

Facility : DUNCAN AVIATION INC.	SRN : N3303
Location : 15745 S AIRPORT RD	District : Kalamazoo
	County : CALHOUN
City : BATTLE CREEK State: MI Zip Code : 49015	Compliance Status : Non Compliance
Source Class : SM OPT OUT	Staff : Rex Lane
FCE Begin Date : 8/27/2017	FCE Completion Date : 8/27/2018
Comments : FCE Report	

List of Partial Compliance Evaluations :

Activity Date	Activity Type	Compliance Status	Comments
08/15/2018	Self Initiated Inspection	Non Compliance	Self Initiated Inspection
11/30/2017	Telephone Notes		Call Received by Duncan Aviation's Consultant: Tom Senne, WLA Consulting

09/01/2017	NSPS (Part 60)	Compliance	<p>Review of Vapor Pressure Notification under 40 CFR 60.116b(d)</p> <p>On 07/17/17, Duncan Aviation (hereafter "facility") submitted a notification under 40 CFR Part 60, Subpart Kb that the true vapor pressure (TVP) for their 100LL (AvGas Low Lead) tank exceeded the limit of 27.6 kPa for June 2017 (27.9 kPa). The notification was received by our office on 07/20/17 and meets the notification requirement of 40 CFR 60.116b(d) which requires the owner or operator to notify the Administrator within 30 days when the maximum TVP of the liquid exceeds the respective maximum TVP values for each volume range. The facility completed installation of an internal floating roof (IFR) on their 100LL tank in November 2011 in response to an August 2010 violation notice to comply with NSPS, Subpart Kb.</p> <p>40 CFR 60.116(b)(d) states: Except as provided in paragraph (g) of this section, the owner or operator of each storage vessel either with a design capacity greater than or equal to 151 m3 storing a liquid with a maximum true vapor pressure that is normally less than 5.2 kPa or with a design capacity greater than or equal to 75 m3 but less than 151 m3 storing a liquid with a maximum true vapor pressure that is normally less than 27.6 kPa shall notify the Administrator within 30 days when the maximum true vapor pressure of the liquid exceeds the respective maximum true vapor vapor pressure values for each volume range.</p> <p>Prior correspondence from the facility's consultant and a web search for 100LL grade Aviation Gas (AvGas) indicates that this fuel type has a typical TVP range of 38 – 44 kPa. Because this fuel has a TVP that is normally above 27.6 kPa and the tank volume is between 75 m3 and 151 m3, the facility was not actually required to submit a written notification to this office under 40 CFR 60.116b(d). -</p>
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09/01/2017

NSPS (Part 60)

Compliance

RIL

09/01/2017	NSPS (Part 60)	Compliance	<p>Review of Vapor Pressure Notification under 40 CFR 60.116b(d)</p> <p>On 08/04/17, Duncan Aviation (hereafter "facility") submitted a notification under 40 CFR Part 60, Subpart Kb that the true vapor pressure (TVP) for their 100LL (AvGas Low Lead) tank exceeded the limit of 27.6 kPa for July 2017 (29.3 kPa). The notification was received by our office on 08/09/17 and meets the notification requirement of 40 CFR 60.116b(d) which requires the owner or operator to notify the Administrator within 30 days when the maximum TVP of the liquid exceeds the respective maximum TVP values for each volume range. The facility completed installation of an internal floating roof (IFR) on their 100LL tank in November 2011 in response to an August 2010 violation notice to comply with NSPS, Subpart Kb.</p> <p>40 CFR 60.116(b)(d) states: Except as provided in paragraph (g) of this section, the owner or operator of each storage vessel either with a design capacity greater than or equal to 151 m³ storing a liquid with a maximum true vapor pressure that is normally less than 5.2 kPa or with a design capacity greater than or equal to 75 m³ but less than 151 m³ storing a liquid with a maximum true vapor pressure that is normally less than 27.6 kPa shall notify the Administrator within 30 days when the maximum true vapor pressure of the liquid exceeds the respective maximum true vapor pressure values for each volume range.</p> <p>Prior correspondence from the facility's consultant and a web search for 100LL grade Aviation Gas (AvGas) indicates that this fuel type has a typical TVP range of 38 – 44 kPa. Because this fuel has a TVP that is normally above 27.6 kPa and the tank volume is between 75 m³ and 151 m³, the facility was not actually required to submit a written notification to this office under 40 CFR 60.116b(d). -</p>
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Name: RIL Date: 8/27/18 Supervisor: MA 8/27/2018

