

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

U41160870235940

FACILITY: Plains LPG Services, L.P.		SRN / ID: U411608702
LOCATION: 6050 Alden Nash Avenue, Alto		DISTRICT: Grand Rapids
CITY: Alto		COUNTY: KENT
CONTACT: Steve Barnhart , Facility Supervisor		ACTIVITY DATE: 08/10/2016
STAFF: Steve Lachance	COMPLIANCE STATUS: Non Compliance	SOURCE CLASS:
SUBJECT: Self-initiated inspection based on neighbor complaint(s)		
RESOLVED COMPLAINTS:		

AQD Staff SLachance (SL) and CRobinson (CR) presented themselves to this facility at about Noon, Wednesday August 10, 2016. As described by Facility Supervisor Mr. Steve Barnhart, this is a Propane and Butane Terminal. The terminal has rail receipt capabilities; this is usually used for butane. Propane arrives on-site via truck. In addition to above-ground tanks, propane is also seasonally stored in underground caverns. This produces waste brine, which is also stored on-site. Finally, the facility "stanches" propane with the addition of ethylmercaptan.

SL explained the receipt of recent complaints and his intent to complete a facility inspection with respect to air use rules, regulations and requirements. Based on the "stanching" activities, handling of (odorous) butane, nocturnal site activities and proximity to the complainant's property, it appeared that this facility is the root of the complainant's concerns.

While no nuisance conditions attributable to the facility have been observed by AQD staff (none this day or during previous reconnaissance; the complainant reports issues in the "wee hours" of the morning), Mr. Barnhart agreed to provide 24/7 contact availability for the complainant. This would facilitate potential identification of processes or activities that could be triggering the complainant's concerns. This would be more efficient than routing complaints/concerns/activities through AQD. Of course, AQD is still available to receive citizen complaints. (SL provided the appropriate phone number to the complainant on the afternoon of August 10, 2016.)

Based on the time of year, no recent stanching activities and active, nocturnal butane rail unloading, it appears that the complaints might have arisen based on butane rail unloading. SL reviewed Daily Operations Logs for July 10/11, 2016 (when the first complaint was received), and these in addition to the attached "Daily Rounds/Routine Inspections" document indicate butane rail unloading corresponding to the complaint. No other issues are noted. Moreover, the site is monitored for leaks/odors, etc. and there were no indications of recent issues. The one issue requiring additional comments on the attached were for "over pressure" alarms in the Cavern Dilution Building; and Mr. Barnhart explained these as "nuisance" alarms that arise from naturally occurring temperature/pressure changes within the caverns.

The underground storage activities date to about 1952; the above-ground gas storage tanks were installed on-site in 2006. (These were built in 1973 but were re-located to this facility in 2006.) These tanks were inventoried as:

- Six (6) by 30,000-gallon butane tanks
- Three (3) by 90,000-gallon propane tanks

While the butane tanks are exempt from PTI requirements per Rule 284(b), the capacity of the propane tanks exceeds the 40,000-gallon threshold afforded by this rule. SL concludes that the tanks were installed in violation of Rule 201.

The stanching activities are considered exempt per Rule 288(a).

Mr. Barnhart stated that all pumps on-site are electric; none use fuel. Electric engines are not subject to air use requirements.

No other equipment on-site was noted to be subject to air use requirements.

SL considers the facility to be in non-compliance with Rule 201 for the installation of the three 90,000-gallon propane tanks without an air use permit. SL recommends issuance of a Violation Notice.

NAME 

DATE 8/12/16

SUPERVISOR 