

P1092

MANILA

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

P109251435

FACILITY: Penske Logistics	SRN / ID: P1092
LOCATION: 15520 Wayne Road, ROMULUS	DISTRICT: Detroit
CITY: ROMULUS	COUNTY: WAYNE
CONTACT: Mike Collins , Safety Manager	ACTIVITY DATE: 11/15/2019
STAFF: Todd Zynda	COMPLIANCE STATUS: Non Compliance
SUBJECT: November 15, 2018 Inspection	SOURCE CLASS: Minor
RESOLVED COMPLAINTS:	

PURPOSE OF INSPECTION: Targeted

INSPECTED BY: Todd Zynda (AQD)

PERSONNEL PRESENT: Mike Collins, Safety Manager; George Jenkins, Senior Operations Manager; Barry Robinson, Maintenance Manager; David Kissick, Assistant General Manager

FACILITY PHONE NUMBER: (586) 719-5153

FACILITY BACKGROUND

Penske Logistics (Penske) located at 15520 Wayne Road, Romulus, Michigan, is a cold storage distribution facility. The facility includes office space and cold storage warehousing. The facility operates 24 hours a day, seven days a week and employs approximately 558 employees.

COMPLAINT/COMPLIANCE HISTORY

On September 3, the U.S. EPA referred a complaint of Penske to the Department of Environment, Great Lakes, and Energy (EGLE) regarding the operation of an anhydrous ammonia refrigeration system (please see attached). The complaint prompted the inspection of the facility conducted on November 15, 2019 and is the subject of this report.

There have been no previous air quality inspections of the facility.

OUTSTANDING CONSENT ORDERS

None

OUTSTANDING VNs

None

INSPECTION NARRATIVE

On November 15, 2019 the EGLE Air Quality Division (AQD) inspector Mr. Todd Zynda conducted an unannounced inspection of Penske located at 15520 Wayne Road, Romulus, Michigan. During the inspection Mr. Mike Collins, Safety Manager, Mr. George Jenkins, Senior Operations Manager, Mr. Barry Robinson, Maintenance Manager, and Mr. David Kissick, Assistant General Manager, provided information and tour of facility operations. Additional information was provided via email by Mr. Chris Hawk, Environmental Engineer, on November 20, 2019.

The inspection was conducted to determine the facility's compliance with the Natural Resources and Environmental Protection Act (NREPA), Act 451, Part 55. The facility operates a 36,000 pound anhydrous ammonia refrigeration system, a 255 kilowatt (KW) diesel fueled emergency generator, and a cold cleaner.

During the inspection, the cold storage warehouse was observed. The facility receives and ships cold storage food for Kroger. The warehouse is divided into areas that vary by temperature: warm storage (55°F), cold storage (35°F), freezer (0°F), and ice cream (-15°F). To maintain the cold temperature storage areas the facility operates a 36,000 pound anhydrous ammonia refrigeration system. The

anhydrous ammonia storage tanks were observed during the inspection. The system is comprised of two tanks, estimated at 18,000 pounds each (approximately 3,600 gallons each [assuming 5 pounds per gallon]).

Following observation of the anhydrous ammonia system, the facility cold cleaner was observed in the maintenance shop. The cold cleaner is approximately 3 feet by 2 feet. Instructions were not posted. Cold cleaner instructions to post were provided by EGLE to the facility via email on November 18, 2019.

The inspection concluded with observation of the diesel fueled emergency generator. The plate on the generator indicates a rated capacity of 255 KW. During the inspection the emergency engine was observed to be equipped with a nonresettable hour meter. During the inspection the engine was not in operation. According to Mr. Jones the facility also operates a 15,000 gallon diesel underground storage tank.

APPLICABLE RULES/PERMIT CONDITIONS

Rule 201 – Anhydrous Ammonia System

The anhydrous ammonia system is in violation of R 336.1201 (Rule 201). Based on the capacity of the anhydrous ammonia system 36,000 pounds (7,200 gallons), the system does not meet the permit to install exemption below.

R 336.1280(2)(a): The requirement to obtain a permit to install does not apply to any of the following: cold storage refrigeration equipment and storage of the refrigerant, including cold storage equipment using anhydrous ammonia that has a storage capacity of less than 500 gallons.

Rule 707 – Cold Cleaner

The facility cold cleaner appears to meet the requirements of R 336.1707 (Rule 707). The SDS provided indicates that the solvent is 100% hydrotreated light distillate (petroleum). The SDS does not list a vapor pressure, but a google search indicates a vapor pressure of < 5 mm Hg at 38°C (0.09668 psi). The facility appears to be in compliance with Rule 707. During the inspections, instructions were not posted. The AQD provided instructions to post via an email on November 18, 2019 (see attached).

Federal Requirements

40 CFR Part 63, Subpart T – National Emission Standards for Halogenated Solvent Cleaning

According to 40 CFR 63.460(a), this standard applies to units that use solvents with concentrations of 5% or more by weight of halogenated compounds (methylene chloride, perchloroethylene, trichloroethylene, 1,1,1-trichloroethane, carbon tetrachloride, or chloroform). The SDS provided for the cold cleaner indicates that material used does not contain the above listed halogenated compounds. Therefore, this standard does not apply.

40 CFR Part 60, Subpart IIII – Standards of Performance for Stationary Compression Ignition Internal Combustion Engines

The emergency engine at the facility is subject to 40 CFR Part 60, Subpart IIII as the engine was constructed after July 11, 2005 and manufactured after April 1, 2006 per §60.4200(a)(2).

Owner/operator must comply with emission standards specified in this subpart (§60.4205). IN COMPLIANCE. The facility provided a picture of the U.S EPA certification that is placard on the engine.

Install a non-resettable hour meter (§60.4209(a)). IN COMPLIANCE. The unit is installed with a non-resettable hour meter.

Limit maintenance checks and readiness testing to 100 hours per year (§60.4211(e)). IN COMPLIANCE. The facility tracks hours of operation on weekly log sheets. Average use is one half hour per week (approximately 26hours per year). Example maintenance log sheets were provided (see attached).

PERMIT TO INSTALL EXEMPT EQUIPMENT

Cold Cleaner

The cold cleaner at the facility is exempt from PTI requirements under the following rule.

R336.1281(2)(h): "The requirement to obtain a PTI does not apply to cold cleaners that have an air/vapor interface of not more than 10 square feet."

Emergency Engine Diesel Storage Tank

The diesel storage tank associated with the emergency engine is exempt from PTI requirements under the following Rule.

R336.1284(2)(d): "Permit to install does not apply to...storage of..diesel fuel oils."

Emergency Engine

The diesel fired emergency engine has a capacity of 255 KW. The specification sheet provided for the generator indicates a maximum fuel usage rate of 17.6 gallons per hour. Based on the maximum fuel usage rate the maximum heat input capacity is 17.6 gallons per hour x 137,000 Btu per gallon = 2.41 MMBtu per hour. The emergency generators is exempt from PTI requirements under the following Rule.

R336.1285(2)(g): "Permit to install does not apply to...Internal combustion engines that have less than 10,000,000 Btu/hour maximum heat input."

APPLICABLE FUGITIVE DUST CONTROL PLAN CONDITIONS

Not Applicable. All lots are paved.

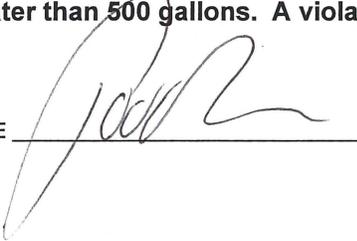
MAERS

At this time, the facility is not required to submit MAERS.

FINAL COMPLIANCE DETERMINATION:

At this time, the facility is in violation of Rule 201 for the installation of an anhydrous ammonia system greater than 500 gallons. A violation notice will be issued.

NAME



DATE

12/16/19

SUPERVISOR

JK