

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

N764324525

FACILITY: MICHIGAN FUELS INC		SRN / ID: N7643
LOCATION: 20700 MACK AVE, GRSSSE PTE WDS		DISTRICT: Detroit
CITY: GRSSSE PTE WDS		COUNTY: WAYNE
CONTACT: Dion Westfall , Manager		ACTIVITY DATE: 03/13/2014
STAFF: Terseer Hemben	COMPLIANCE STATUS: Pending	SOURCE CLASS:
SUBJECT: Remediation-VOC		
RESOLVED COMPLAINTS:		

Annual Scheduled Compliance Inspection

Michigan Fuels Inc. /Bill Saad Group

20700 Mack Ave, Grosse Pointe Woods, or 20755 West Road, Woodhaven, MI 48183

SRN: N7643

Permit#: 228-06

Responsible Official: Mr. Dion Westfall – 734-231-6019; 734-692-2700; FAX: 734-692-2118

Ms. Magham Yacoub- 313-886-7110

Date: March 13, 2014

Narrative

I arrived at the facility premises on March 13, 2014 at 1310 hours. The purpose of visit was to conduct an annual scheduled inspection for compliance with PTI No, 228-06. Snow covered the grounds. I met with the manager, Ms. Magham Yacoub. Ms. Yacoub took me into a side room where we conducted a pre-inspection interview. The manager informed the facility had not been modified since construction was completed. Additionally, the facility had not been inspected since permitted. We walked outside the gas station and examined the stack. I provided a list of records for Michigan fuels to furnish allowing 7 working days from the date of inspection for submittal to AQD office.

Permit #228-06: Basis for Compliance Evaluation

Based on the above permit regulating remediation sources involving soil vapor extraction system with 2 carbon adsorption units, and any other associated pollution control devices, the following agenda was provided to Michigan Fuels for providing emission records:

1. In compliance- Michigan Fuels Inc. (MFI) demonstrated there has not been any modification to any system, and/ or process at the above referenced facility in the last 24 months (Rule 336.1216). The manager, Magham Yacoub verbally stated no modifications were made at the facility since construction.
2. Not in Compliance- MFI did not demonstrate the total volatile organic compounds (VOC) emission rate from the control system did not exceed 10.0 tons per year based on 12-month rolling time period as determined at the end of each calendar month. Request maintenance records covering the last 12 months (SC. 1.1a). The facility has been cited for failure to provide records as requested in permit.

3. **Not in compliance – MFI did not demonstrate the total gasoline emission rate from the control system did not exceed 10.0 tons per year based on 12-month rolling time period as determined at the end of each calendar month. Request maintenance records covering the last 12 months (SC. 1.1b). The facility has been cited for failure to provide records as requested in permit.**
4. **Not in compliance- MFI did not demonstrate the total BTEX emissions rate from the control system did not exceed 10.0 tons per year based on 12-month rolling time period as determined at the end of each calendar month. Request maintenance records covering the last 12 months (SC. 1.1c). The facility has been cited for failure to provide records as requested in permit.**
5. **Not in compliance- MFI did not demonstrate there were no benzene, toluene, ethylbenzene, xylene, xylene or gasoline emissions at the stationary source other than those covered by this general permit at the site. Request confirmation records covering the last 12 months (SC. 1.2). The facility has been cited for failure to provide records as requested in permit.**
6. **Not in compliance – MFI did not demonstrate, if the source has potential VOC or gasoline emissions greater than 10 tons per year and/or total BTEX emissions greater than 1 ton per year, the permittee did not operate FGREMEDICATION unless the associated control device(s) were installed, maintained, and operated properly according to the manufacturer’s specifications. Request maintenance records covering the last 12 months if applicable (SC. 1.3). The facility has been cited for failure to provide records as requested in permit.**
7. **Not in compliance- MFI did not demonstrate, if applicable, the Activated Carbon adsorption system met the 95% carbon reduction of hydrocarbon emissions to the atmosphere, and the first canister of the dual-stage granulated activated carbon system was monitored for breakthrough and replaced when breakthrough was detected per condition 1.6 [SC. 1.3a). Request records covering the last 12 months. The facility has been cited for failure to provide records as requested in permit.**
8. **Not in compliance – MFI did not demonstrate, if applicable, the internal combustion engine used in remediation met the proper operation with minimum requirement of 98% reduction of hydrocarbon emissions to the atmosphere; the engine was equipped with two catalytic converters in series operated at minimum temperature of 650 F at the inlet of the first catalytic converter, and the temperature indication device was well maintained in accordance with manufacturer’s specifications [SC. 1.3d]. Request records covering the last 12 months. The facility has been cited for failure to provide records as requested in permit.**
9. **Not in compliance- MFI did not demonstrate that for ground water remediation, the permittee monitored and recorded the water flow rate and the VOC, gasoline or BTEX concentrations in the influent and effluent water streams of each air stripper, using Appendix R-1; and the monitoring frequency was once per week until four valid samples were obtained; and there after the monitoring frequency was quarterly; the influent and effluent ground water samples were analyzed using the analytical method SW-846-Method 8260 (analysis for methyl (tert)butyl ether must be specifically**

requested. (SC 1.4). **Request records covering last 12 months.** The facility has been cited for failure to provide records as requested in permit.

10. Not in compliance – MFI did not demonstrate for soil remediation, permittee monitored and recorded the gas flow rate and the VOC, gasoline or BTEX concentrations at the outlet of the soil vapor extraction system using Appendix R-2; and the monitoring frequency was once per week until four valid samples were obtained; and there after the monitoring frequency was once per month for five months; then the monitoring frequency was quarterly. The vapor stream(s) were analyzed using 40 CFR Part 60 method-Method 18 measurements, Measurement of gaseous Organic Compound Emissions by Gas Chromatography or equivalent. (SC 1.5). **Request records covering last 12 months.** The facility has been cited for failure to provide records as requested in permit.
11. Not in compliance – MFI did not demonstrate for a dual-stage granulated activated carbon system, the permittee monitored in a satisfactory manner, the dual-stage activated carbon system for breakthrough of the first canister at least once every two weeks. Breakthrough was evaluated via Tedler bag sampling followed by laboratory analysis; by use of a hand-held instrument capable of detecting concentrations at the levels expected; or an equivalent method. An initial monitoring test was conducted and the initial reading was recorded as soon as the process had reached a steady state condition, but not later than 12 hours after start-up of the process. A reading at the point between the first and second canisters that was 20 percent or more of the influent concentration into the first canister was considered to be breakthrough. If breakthrough detected, permittee did not operate the system until the carbon in the first canister had been replaced and operating order of the canister had been reversed. The initial monitoring test was repeated each time a carbon canister was replaced and the resulting influent concentration was used to establish breakthrough (SC. 1.6). **Request records covering last 12 months.** The facility has been cited for failure to provide records as requested in permit.
12. Not in compliance- MFI did not demonstrate the permittee kept in a satisfactory manner, monthly and annual records of the total VOC, gasoline and/or BTEX from FG-REMEDICATION; and annual records were based on a 12-month rolling time period as determined at the end of each calendar month. All records including Appendix R-1 and/or R-2 were kept on file for a period of at least five years and made available to the Department upon request (SC. 1.7). **Request records for the last 12 months.** The facility has been cited for failure to provide records as requested in permit.
13. Not in compliance- MFI did not demonstrate the permittee kept, in a satisfactory manner, records of the date, duration, and description of any malfunction of the control equipment, any maintenance performed, any replacement of catalyst, or control equipment media and any testing results for FG-REMEDICATION; all records were kept on file for a period of at least five years available to the Department upon request (SC. 1.8). **Request record of malfunction abatement plan.** The facility has been cited for failure to provide records as requested in permit.
14. Not in compliance- MFI did not demonstrate the exhaust gases from FG-REMEDICATION were discharged unobstructed vertically upwards to the ambient air at an exit point at least 1.5 times the building height (from ground level to point of

discharge), but not less than 20 feet above ground level, with minimum exit velocity of 30 feet per second (SC. 1.9). Visual inspection required. The facility has been cited for failure to provide records as requested in permit.

Inspection Areas of Focus:**1. Soil vapor extraction equipment**

The unit was fortified with a brick walls. However, the environment was clean. The stack was up and discharging exgahust gases unobstructed vertically to the ambient air.

2. Disposal of contaminants

There was no unusual odor indicating oxidized VOC. The air around the facility was fresh smelling in the snow environment.

3. Other general associated environmental processes on site

There were no open cans or containers or pool of standing water on the premise. There were no open cans or containers with organic liquids on the site. The environment was clean and did not emit unusual odors.

NB: Please respond to the requested items highlighted in bold within 7 working days. The records have not been delivered at this time of reporting.

Determination

In determination, AQD inspected the Michigan Fuels Inc. facility located at 20700 Mack Ave. The facility neither produced nor provided records as pledged to do during the inspection. The Company did not disclose if records were kept or not kept since facility was commissioned. I sent a violation notice to Michigan Fuels Inc. for failing to provide records for inspection. Michigan Fuels did not operate in compliance with General Permit # 228-06.

NAME ThermerDATE 3/15/2014 SUPERVISOR W.M.