

DEPARTMENT OF ENVIRONMENTAL QUALITY  
AIR QUALITY DIVISION  
**ACTIVITY REPORT: On-site Inspection**

P033156896

<b>FACILITY:</b> AMD FUTURE, INC.		<b>SRN / ID:</b> P0331
<b>LOCATION:</b> MOBILE GAS STATION, NOVI		<b>DISTRICT:</b> Warren
<b>CITY:</b> NOVI		<b>COUNTY:</b> OAKLAND
<b>CONTACT:</b> Michaelle Wright ,		<b>ACTIVITY DATE:</b> 11/13/2020
<b>STAFF:</b> Iranna Konanahalli	<b>COMPLIANCE STATUS:</b> Compliance	<b>SOURCE CLASS:</b> MINOR
<b>SUBJECT:</b> FY2021 scheduled inspection of AMD Future, Inc., Mobil Gas Station		
<b>RESOLVED COMPLAINTS:</b>		

**AMD Future, Inc. (P0331)**  
**Mobil Gas Station**  
**43407 Grand River**  
**Novi, Michigan 48375-1106**  
**248-305-3085**  
**Ms. Michelle Wright, Store Manager**

**File: Gas Stations**  
**Rules 336.1627, 336.1606 & 336.1703**

**Subject to: Area NESHAP / MACT 6C, 40 CFR, Part 63, Subpart CCCCCC**—National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Dispensing Facilities (GDF). National Emission Standards for Hazardous Air Pollutants for Source Categories: Gasoline Distribution Bulk Terminals, Bulk Plants, and Pipeline Facilities; and Gasoline Dispensing Facilities, Page 1916, Federal Register / Vol. 73, No. 7 / Thursday, January 10, 2008 / Rules and Regulations/ Final rule.

The NESHAP / MACT is for each GDF that is located at an area source. The affected source includes each gasoline cargo tank during the delivery of product to a GDF and also includes each storage tank. AQD has decided not to take delegation of these standards and therefore no attempt has been made evaluate the gas station's compliance with NESHAP / MACT 6C. The stack appears to be not conducted to satisfy MACT 6C.

**VN:** AQD issued April 5, 2012, Violation Notice (VN) for Rules 606/703 and 910. AQD received the VN response letter dated April 9, 2012 from Ms. Debbie Ott (Ph: 517-223-7663) of Ott Trucking, Inc., 7040 N. Fowlerville Road, Fowlerville, MI 48836-8743. Ms. Ott stated in her April 5, 2012, letter that the staff training was conducted regarding the vapor balance system and the errant driver Mr. Dwayne Alton Sauls (DOB: 04/25/1972) was terminated.

**Rule 627:** Pursuant to Executive Order 3012-14, LARA administers Rule 336.1627, vacuum / pressure (US EPA RM 27) test program.

Initial Pressure = 18 inches of water. Allowable pressure change ( $\Delta p$ ) = 3 inches of water in 5 minutes. Initial Vacuum = 6 inches. Allowable vacuum change ( $\Delta v$ ) = 3 inches of water in 5 minutes.

*Additional requirements:* Pursuant to Act 451, Part 121, Sec. 12113(2), gasoline spilled into the spill containment must be pumped out immediately and stored in a closed container to prevent evaporative losses; absorbent towels, pads, tails or pigs may also be used. It must be managed as hazardous material (HM) / liquid industrial waste (LIW) according to Act 451, Part 121 Sec. 12102a(a) if recycled as fuel. The gasoline may eventually be recycled after treatment to bring it up to the gasoline quality standards. It may be noted that when spill containment has liquid in it (either water or gasoline or debris), it will not be able to contain spills that will occur, and its purpose will be defeated. In addition, if spill containment fails to function as designed, the gasoline will spill over to concrete surface causing fire and explosion safety hazard; evaporation will cause air pollution. All liquids and debris must be promptly removed from the spill containments and disposed of properly. Act 451, Part 5, Sec. 280.20 requires properly operating spill containment such that release of gasoline product to the environment (air, water, soil) does not occur.

On November 13, 2020, I conducted a level 2 FY2021 scheduled inspection of AMD Future, Inc., Mobil Gas Station, located at 43407 Grand River Road, Novi, Michigan 48375. The inspection was conducted to determine compliance with the Federal Clean Air Act; Article II, Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 (PA 451); and Michigan Department of Environment Great Lakes and Energy, Air Quality Division (EGLE-AQD) administrative rules (Rules 336.1627 & 336.1606 / 336.1703).

During the inspection, Mr. Tanik Jindal, an attendant at the Novi Mobil gas station, assisted me.

Any existing gasoline tank (placed into operation before 07/01/79) shall comply with the requirements of Rule 606 (R336.1606). Any new gasoline tank (placed into operation on or after 07/01/79) shall comply with the requirements of Rule 703 (R336.1703). Both rules require a permanent submerged fill pipe, an interlocking system and a vapor balance system subject to throughput and capacity conditions described in the rules. Wayne, Oakland, Macomb, Washtenaw, St. Clair, Livingston, etc. counties of Southeast Michigan are required implement Stage I vapor recovery. Vapor balance system is required for all gasoline products but not for diesel.

**Rule 627:** Pursuant to Rule 336.1627, vacuum / pressure (US EPA RM 27), the vacuum / pressure test for vapor tightness is required for all trucks delivering gasoline products; but not for diesel delivery trucks. .

When I arrived at the site in Novi on November 13, 2020, the loading of the gas station tank (dropping a load) was NOT in progress as there was no gasoline delivery truck during the inspection. I asked the attendant, Jindal, to clean up the spill buckets and maintain them clean: free of debris, gasoline, and water. I also advised Jindal of importance of connecting a vapor balance system properly in a leak-proof and spill-proof manner.

**Two-point (Dual-point):** vapor and liquid lines connections for four (4) tanks.

**Spill containment / spill bucket:** All four containments had some debris and water. I asked Mr. Jindal to clean up the spill buckets.

**Submerged fill pipe:** Present.

**Conclusion:**

Some debris and water were present in the spill buckets (< 25%). I asked the attendant, Jindal, to clean up the spill buckets and maintain them clean. Spill bucket is regulated by Tanks Program.

NAME *J. S. Marshall*

DATE February 5, 2021 SUPERVISOR *Joyce*