

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

*FY 2015 Insp*

U63150041428299

FACILITY: USA-2-GO Sunoco	SRN / ID: U631500414
LOCATION: 30560 Milford Road	DISTRICT: Southeast Michigan
CITY: New Hudson	COUNTY: OAKLAND
CONTACT: <i>[Signature]</i>	ACTIVITY DATE: 10/01/2014
STAFF: Iranna Konanahalli	SOURCE CLASS:
COMPLIANCE STATUS: Compliance	
SUBJECT: FY 2015 inspection of USA-2-GO Sunoco, New Hudson	
RESOLVED COMPLAINTS:	

*U-63-15-00414-SAR-2014 10 01*

**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. Amended at 73 FR 12276, March 7, 2008; 73 FR 35944, June 25, 2008; 76 FR 4181, January 24, 2011.**

Page 12275 Federal Register / Vol. 73, No. 46 / Friday, March 7, 2008 / Rules and Regulations / Final rule; correction

Page 35939, Federal Register /Vol. 73, No. 123 /Wednesday, June 25, 2008 /Rules and Regulations / Direct final rule. amendments for GDF MACT 6C that EPA promulgated on January 10, 2008, and amended on March 7, 2008.

Page 4156, Federal Register / Vol. 76, No. 15 / Monday, January 24, 2011 / Rules and Regulations/ Final rule/; amendments for GDF MACT 6C that EPA promulgated on January 10, 2008, and amended on March 7, 2008.

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.

**Terminal:**

**NA**

**Transporter:**

**BNJ Leasing**  
**205 N. Kinney**  
**Mount Pleasant, MI 48858**

**Gasoline Trailer License No.: B286753 Michigan  
Trailer No.: 206**

**Driver: Mr. David Lane Sturgil (DOB: 12/05/1962)**

**Gasoline Delivery at:**

**USA-2-GO Sunoco (U-63-15-00414)  
30560 Milford Road  
New Hudson, Michigan 48165-8583  
Mr. NA, Store Manager  
Phone: (248) NA**

On October 01, 2014, I conducted a level 2 self-initiated inspection of USA-2-GO Sunoco, located at 3560 Milford Road, New Hudson, Michigan. 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 Environmental Quality, Air Quality Division (MDEQ-AQD) administrative rules (Rules 336.1627 & 336.1606 / 336.1703).

During the inspection, Mr. David Lane Sturgil, a truck driver, 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.

When I arrived at the site in New Hudson, the loading of the gas station's tank (dropping a load) using only gravity (no pump) was in progress.

The driver first connected a vapor line (2-inch diameter line), which was connected to a vapor manifold, and then liquid (gasoline, 4-inch diameter line) line before loading the underground tank. When a vapor balance system is connected properly, gasoline vapors from a gas station's tanks are expected to transfer to a trailer tank and not to ambient air; the trailer tank is expected to return vapors to a gasoline storage and distribution terminal.

**Co-axial** vapor and liquid lines connections were used. Two liquid and two vapor lines were connected simultaneously.

**Two-point (Dual-point; not Co-axial):** Not used.

**Vapor manifold:** Manifold vapor line for simultaneous loading of multiple tanks.

**Spill containment / spill bucket:** The containments were okay.

**Submerged fill pipe:** present.

**Vapor balance system:** During gasoline loading vapor balance system was operated properly. 2-inch diameter vapor and 4-inch diameter liquid lines were connected properly.

**Rule 627:** Pursuant to Rule 336.1627, vacuum / pressure (US EPA RM 27) test was conducted. The driver did have the current Rule 627 test results. The Rule 336.1627 test was performed on February 17, 2014, at Paul's Vapor Repair (Phone: 313-530-1656), 20532 Pennsylvania Road, Taylor, Michigan 48180.

**Conclusion:**

Rule 627 Vacuum / Pressure test results were present on the truck. Vapor balance system was operated properly.

NAME J. L. Hannahell DATE 01/15/2015 SUPERVISOR CJE