## DEPARTMENT OF ENVIRONMENTAL QUALITY

## AIR QUALITY DIVISION

ACTIVITY REPORT: Self Initiated Inspection

FY2015 INSP-

FACILITY: Mobil Gas Station	SRN / ID: U631509495
LOCATION: 4290 Walton Road	DISTRICT: Southeast Michigan
CITY: Waterford	COUNTY: OAKLAND
CONTACT: 10	ACTIVITY DATE: 05/29/2015
STAFF: Iranna Konanahalli COMPLIANCE STATUS: Co	ompliance SOURCE CLASS:
SUBJECT: FY 2015 inspection of the above Gasoline Trailer and Ga	s Station - McKinley Trucking & Mobil Gas Station
RESOLVED COMPLAINTS:	

U63 15 09495 - SAR - 2015 05 29

File: Gas Stations Rules 336.1627, 336.1606 & 336.1703

Subject to: Area NESHAP / MACT 6C, 40 CFR, Part 63, Subpart CCCCC—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:

McKinley Trucking 652 North Williams Road Carlson City, Michigan 48811

Gasoline Trailer License No.: C434960 Michigan

Trailer No.: 123T

Driver: Mr. Jeffrey Scott Sternbergh (DOB: 01/19/1962

Gasoline Delivery at:

Amir Yaldo, Owner Mobil Gas Station (U-63-15-09495) 4290 Walton Road Waterford, Michigan 48329-4180 (248) 674-4076)

On May 29, 2015, I conducted a level 2 self-initiated inspection of the above Gasoline Trailer. 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, the truck driver, assisted me.

When I arrived at the site in Waterford, the loading of the gas station tank (dropping a load) was in progress.

Two-point (Dual-point; not co-axial) vapor and liquid lines connections were used. Both liquid and vapor connections were made properly.

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

Vapor balance system: During gasoline loading, the vapor balance system was operated properly. 2-inch diameter vapor lines and 4-inch diameter liquid lines were connected (dual-point).

The driver first connected a vapor line (2-inch diameter gasoline vapor), 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 tank 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.

Loading was by gravity flow; vapor line (2-inch diameter gasoline vapor) to common manifold and liquid line (4-inch diameter liquid gasoline line).

**Spill containment / spill bucket:** Spill bucket had some gasoline in it. The driver refused to clean it up. I let the gas station owner know about it, who said he would clean it up.

**Submerged fill pipe:** As in most gas stations, submerged fill pipe was present. I did confirm a submerged fill pipe going all the way down to the bottom of the tank when the liquid lines were disconnected.

**Rule 627**: Pursuant to Rule 336.1627, vacuum / pressure (US EPA RM 27) test must be conducted on an annual basis and the driver did NOT have Rule 627 paperwork.

## Conclusion

Rule 627 Vacuum / Pressure test results were NOT present on the truck. Vapor balance system was operated properly. Yapor lines were connected to a vapor manifold. Spill containment had some gasoline.