

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

P0382
FY 2016 Insp-

P038236421

FACILITY: Marathon Gas Station		SRN / ID: P0382
LOCATION: 3490 WEST MAPLE ROAD, WALLED LAKE		DISTRICT: Southeast Michigan
CITY: WALLED LAKE		COUNTY: OAKLAND
CONTACT:		ACTIVITY DATE: 08/19/2016
STAFF: Iranna Konanahalli	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: FY 2016 inspection of Marathon Gas Station		
RESOLVED COMPLAINTS:		

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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:

Petroleum Transport
4967 Crooks Road
Troy, Michigan 48098
Phone: 248-267-8280 or 800-434-1173

**Gasoline Trailer License No.: D042248 Michigan
Trailer No.: 829**

Driver: Mr. James Curtis Beck (DOB: 06/13/1972)

Gasoline Delivery at:

**Marathon Gas Station (P0382)
3490 East West Maple Road
Commerce Township, MI 48390-3852**

On August 19, 2016, I conducted a level-2 self-initiated inspection of the above Gasoline Trailer and Gas Station. 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.

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 Commerce Twp., the loading of the gas station tank (dropping a load) was in progress. The loading was completed within a couple minutes of my arrival.

Two-point (Dual-point; not Co-axial) vapor and liquid lines connections were used. Simultaneously, two liquid lines were connected for dropping gasoline product.

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

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

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) lines 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.

Spill containment / spill bucket: Some water and liquid gasoline. I asked the gas station attendant to clean up water from the bucket. I observed some bubbles in water and the driver said he would replace the gasket.

Submerged fill pipe: As in most gas stations, submerged fill pipe was present. I did confirm

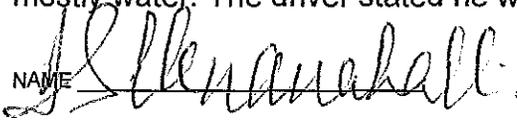
a submerged fill pipe going all the way down to the bottom of the tank when the liquid line was disconnected.

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 April 14, 2016, at United Tank, Inc. (313-338-1306), 19300 Maginnity Road, Melvindale, Michigan 48122.

Conclusion

Rule 627 Vacuum / Pressure test results were present on the truck. Vapor balance system was operated properly. The vapor lines were connected to a vapor manifold. Spill bucket had mostly water. The driver stated he would replace the gasket.

NAME



DATE



SUPERVISOR



