

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

P0672
 FY 2019 Insp -

P067246985

FACILITY: Costco Livonia II Warehouse No. 391		SRN / ID: P0672
LOCATION: 20000 Haggerty Road, LIVONIA		DISTRICT: Southeast Michigan
CITY: LIVONIA		COUNTY: WAYNE
CONTACT:		ACTIVITY DATE: 10/30/2018
STAFF: Iranna Konanahalli	COMPLIANCE STATUS: Compliance	SOURCE CLASS: Minor
SUBJECT: FY 2019 inspection of Costco Gas Station (Costco Livonia II Warehouse No. 391)		
RESOLVED COMPLAINTS:		

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 no delegation of these standards and therefore no attempt has been made to evaluate the gas station’s compliance with NESHAP / MACT 6C.

Terminal:

NA

Transporter:

Kenn Advantage Group, Inc.
Advantage Tank Lines, Inc.

**5318 Stickney Ave.
Toledo, OH 43612
Ph: 419-729-4880**

**Gasoline Trailer License No.: P549795 Indiana
Trailer No.: 13018**

Driver: NA – Refused to give his name

Gasoline Delivery at:

**Costco Livonia II Warehouse No. 391 Gas Station, Livonia (P0672)
20000 Haggerty Road
Livonia, Michigan 48152-1011
Mr. Zack Teague, Asst. General Manager
(734) 464-6399**

On October 30, 2018, I conducted a level 2 self-initiated FY 2019 inspection of Costco Gas Station (Costco Livonia II Warehouse No. 391) located at 20000 Haggerty Road, Livonia, Michigan 48152-1011. 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 my inspection, Zack Teague, Asst. General Manager, Livonia Costco Store, assisted me.

During the inspection, a truck driver, assisted me. He refused to give his name.

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 Livonia, the loading of the gas station tank (dropping a load) was about to begin.

Two-point (Dual-point and not Co-axial) vapor and liquid lines connections were used.

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 were connected properly (dual-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) 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.

To two (2) underground tanks, Regular 87 gasoline product was dropped simultaneously.

Spill containment / spill bucket: Spill containment had neither water nor gasoline. In order for any spill bucket to function as intended it must be empty; i.e. to hold gasoline spill. LARA's (Dept. of Licensing and Regulatory Affairs) Storage Tank Division (STD) must ensure proper surface hydraulics such that spill bucket is located at higher level on the ground to prevent storm water entry into it.

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 May 02, 2018 (Tank # 13018), at United Tank Parts, Inc. (313-388-3306), 19300 Meginnity Road, Melvindale, Michigan 48122.

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 (Δp) = 3 inches of water in 5 minutes. Initial Vacuum = 6 inches. Allowable vacuum change (Δv) = 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.

Conclusion:

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

NAME J. Llanawhall DATE 11/19/2018 SUPERVISOR Joyce