DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: Self Initiated Inspection FY2015 Insp-

U63150234529213

FACILITY: BP Gas Station		**SRN / ID:** U631502345
LOCATION: 27700 Mound Road		**DISTRICT:** Southeast Michigan
CITY: Warren		**COUNTY:** OAKLAND
CONTACT:		**ACTIVITY DATE:** 04/14/2015
STAFF: Iranna Konanahalli	**COMPLIANCE STATUS:** Compliance	**SOURCE CLASS:**
SUBJECT: FY 2015 inspection of the Gasoline Trailer and Gas Station - BP Gas Station and AOG Trucking, Inc.		
RESOLVED COMPLAINTS:		

U-63-15-02345_SAR_2015 04 14

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:

AOG Trucking, Inc.
3335 Greenfield Road
Melvindale, Michigan 48122
Phone: 734-552-9198

Gasoline Trailer License No.: C547778 Michigan
Trailer No.: 400

Driver: Mr. Eric William-C Miller (DOB: 09/24/1975)

Gasoline Delivery at:

BP Gas Station (U-50-15-02345)
27700 Mound Road
Warren, MI 48092-4559

On April 14, 2015, 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 Detroit, the loading of the gas station tank (dropping a load) was in progress.

Co-axial (not Dual-point; Co-axial) vapor and liquid lines connections were used. Simultaneously, two liquid lines were connected. Octane 87 and Octane 93 gasoline products were dropped.

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 (co-axial).

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: Empty.

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 28, 2014, at AOG Trucking, Inc., 3335 Greenfield Road, Melvindale, Michigan 48122 (Phone: 734-552-9198).

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 was empty.

NAME Ellie marshall DATE 04/22/2015 SUPERVISOR CJE