

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

U-63-18-08137
FY2018 Insp

U63180813746318

| | | |
|---|-------------------------------|------------------------------|
| FACILITY: Shell Gas Station | | SRN / ID: U631808137 |
| LOCATION: 1100 W. 8 Mile Road, Ferndale | | DISTRICT: Southeast Michigan |
| CITY: Ferndale | | COUNTY: OAKLAND |
| CONTACT: | | ACTIVITY DATE: 08/08/2018 |
| STAFF: Iranna Konanahalli | COMPLIANCE STATUS: Compliance | SOURCE CLASS: |
| SUBJECT: FY 2018 inspection of Shell Gas Station, 1100 W. 8 Mile Road, Ferndale | | |
| 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:

Mr. Jon Krueger

BNJ Leasing
205 N. Kinney Road
Mount Pleasant, MI 48858
Ph: 800-878-2000

Gasoline Trailer License No.: C474460 Michigan
Trailer No.: 375

Driver: Mr. David.

Gasoline Delivery at:

Shell Gas Station (U-63-18-08137)
1100 W. 8 Mile Road
Ferndale, Michigan 48220
(248) 544-2130

On August 08, 2018, I conducted a level 2 self-initiated **FY 2018 inspection** of Shell Gas Station, located at 1100 W. 8 Mile Road, Ferndale, Michigan 48220. 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, 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 Ferndale, the loading of the gas station tank (dropping a load) was complete. Hence, I did not observe vapor balance system in operation.

Co-axial / Two-point (Dual-point): NA.

Vapor manifold: NA.

Vapor balance system: NA.

Spill containment / spill bucket: NA

Submerged fill pipe: NA

Rule 627: Pursuant to Rule 336.1627, vacuum / pressure (US EPA RM 27) test was conducted based upon faxed copy (AQD received on August 08, 2018. Tested on Feb 14, 2018). The driver did NOT have the current Rule 627 test results but had expired January 18, 2017, test results; also, for incorrect Unit No. 206. The Rule 336.1627 test for Unit No. 375 that delivered the gas on this day was performed on February 14, 2018, at Paul's Vapor Repair, Inc. (313-530-1656), 20532 Pennsylvania Road, Taylor, Michigan 48160.

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 for correct unit and correct date were NOT present on the truck; AQD received a faxed copy (Unit No. 375. Tested on Feb 14, 2018). I did not observe Vapor Balance System in operation as dropping the product was completed before my arrival at the site.

NAME J. McNameahall

DATE 09/26/2018

SUPERVISOR

Joyce B.

