

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

FY2015 Insp

U8210042628900

FACILITY: Shell Gas Station #2543, True North Energy, Inc.	SRN / ID: U82100426
LOCATION: 47373 Five Mile Road, Plymouth	DISTRICT: Detroit
CITY: Plymouth	COUNTY: WAYNE
CONTACT:	ACTIVITY DATE: 03/11/2015
STAFF: Iranna Konanahalli	COMPLIANCE STATUS: Compliance
SUBJECT: FY 2015 inspection of the Gasoline Trailer and Gas Station: Shell Gas Station #2543 and Landmark Contracting Goodwill, LLC	SOURCE CLASS:
RESOLVED COMPLAINTS:	

U-82-10-0426-SAR-2015 03 11

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:

Landmark Contracting Goodwill, LLC
40500 Ann Arbor Road
Plymouth, Michigan 48170

Phone: 734- 207-1414

**Gasoline Trailer License No.: D092675 Michigan
Trailer No.: 1067**

Driver: Arrif Missed Ali (DOB: 09/11/1966)

Gasoline Delivery at:

**Shell Gas Station #2543 (U-82-10-0426)
True North Energy, Inc.
aka JBR Associates
47373 Five Mile Road
Plymouth, MI 48170-3768**

On March 11, 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 Plymouth, 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.

Vapor manifold: Manifold vapor line for simultaneous loading of multiple tanks. However, driver dropped gasoline product into one tank.

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 (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) 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.

The driver dropped the product into only one underground tank.

Spill containment / spill bucket: Gasoline spill occurred into the bucket due to leaky connections during the loading. The driver cleaned it up upon request. The bucket must be empty in order for it to work properly; room for spills.

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 September 17, 2014, at Custom Tank, Inc. (Phone: NA), 10200 Harrison Road, Romulus, Michigan 48174.

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. The driver cleaned up the spill bucket of gasoline spill.

NAME Jill Hannahall DATE 03/23/2015 SUPERVISOR CJE