

Oakland

BP Gas Station

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

U-63-18-00 657  
 FY 2018 Insp

U63180065743265

FACILITY: BP Gas Station - Coolidge Mart Inc.		SRN / ID: U631800657
LOCATION: 4727 Coolidge Hwy.		DISTRICT: Southeast Michigan
CITY: Royal Oak		COUNTY: OAKLAND
CONTACT:		ACTIVITY DATE: 01/18/2018
STAFF: Iranna Konanahalli	COMPLIANCE STATUS: Compliance	SOURCE CLASS:
SUBJECT: FY 2018 inspection - BP Gas Station - Coolidge Mart Inc.		
RESOLVED COMPLAINTS:		

File: Gas Stations  
 Rules 336.1627, 336.1606 & 336.1703

Subject to: Area NESHAP / MACT 6C, 40 CFR, Part 63, Subpart CCCCC—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:

B & R Trucking  
 Barrack Enterprises

4338 Delemere Blvd.  
Royal Oak, Michigan 48073  
Phone: 313-530-1656 (supervisor Paul Jackson)

**Gasoline Trailer License No.: D630116 Michigan  
Trailer No.: 951**

**Driver:** Mr. Norman Kaine Torck (DOB: 01/04/1979)

**Gasoline Delivery at:**

BP Gas Station - Coolidge Mart Inc. (U-63-18- 00657)  
4727 Coolidge Hwy. (14 Mile / Coolidge)  
Royal Oak, Michigan 48073-1661  
Phone: (248) 549-2660

On January 11, 2018, I conducted a level 2 self-initiated inspection of the above Gasoline Trailer. 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. Norman Kaine Torck, a truck driver, assisted me.

When I arrived at the site in Royal Oak., 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. Both liquid and vapor connections were made properly.

**Vapor manifold:** Manifold vapor line for simultaneous loading of multiple tanks. Gasoline was dropped simultaneously to two underground tanks. Next, Premium, which I did not observe, was dropped.

**Vapor balance system:** During gasoline loading, the vapor balance system was operated properly. 2-inch diameter vapor lines and 4-inch diameter liquid lines were connected (dual-point, not co-axial). Gasoline was dropped simultaneously to two underground tanks.

Loading by gravity flow, simultaneously using two vapor lines (2-inch diameter gasoline vapor lines) to a common manifold and two liquid lines (4-inch diameter liquid gasoline lines).

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.

**Spill containment / spill bucket:** No spills occurred. All buckets were empty allowing them to operate properly when accidental spill occurs. 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 lines were 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 June 23, 2017, at Paul's Vapor Testing, Inc. (Phone: 313-530-1656), 20532 Pennsylvania Road, Taylor, Michigan 48180.

**Rule 627 Repairs:** Replaced vent boot.

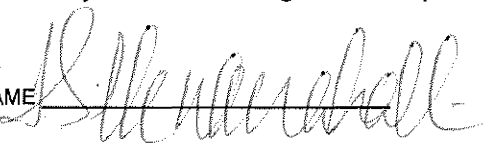
Pursuant to Executive Order 3012-14, LARA administers Rule 336.1627, vacuum / pressure (US EPA RM 27) test program.

Initial Pressure = 18 inches of water. Allowable pressure change ( $\Delta p$ ) = 3 inches of water in 5 minutes. Initial Vacuum = 6 inches. Allowable vacuum change ( $\Delta v$ ) = 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. Vapor lines were connected to a vapor manifold. Spill containments were dry with neither gasoline spills nor water due to either rain or snow.

NAME  DATE 02/08/2018 SUPERVISOR 