

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: On-site Inspection

P008057236

FACILITY: Speedway Gas Station #8814		SRN / ID: P0080
LOCATION: 24771 Coolidge Hwy, OAK PARK		DISTRICT: Warren
CITY: OAK PARK		COUNTY: OAKLAND
CONTACT:		ACTIVITY DATE: 03/03/2021
STAFF: Iranna Konanahalli	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: FY 2021 scheduled inspection (on-site) of Speedway Gas Station #8814 ("Speedway #8814").		
RESOLVED COMPLAINTS:		

Speedway Gas Station #8814 (P0080)
24771 Coolidge Road
Oak Park, Michigan 48237-1484
Ms. Latonya Johnson, Manager
(248) 547-6890

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.

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. The stack appears to be not conducted to satisfy MACT 6C.

VN: AQD issued March 24, 2010, Violation Notice (VN) for Rules 606/703 and 910 (the broken submerged fill pipe (liquid) resulted in excess gasoline (about 1 gallon liquid) pooling in a manhole near concrete surface where liquid line connection is made). AQD received the VN response letter dated April 21, 2010, from Ms. Michelle McKee (937-863-7034), Environmental Manager. Ms. McKee stated, on August 16, 2010, that the parent company, Marathon, would require removal of any product spilled. Marathon would require repairs for seals and fittings. Marathon is also requiring McKinley Trucking Co. to carry hand-pumps on their truck to assist in removal of product in the spill containments.

Rule 627: 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.

On March 3, 2021, I conducted a level 2 **FY 2021 scheduled inspection (on-site)** of Speedway Gas Station #8814 ("Speedway #8814"). 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 Environment Great Lakes and Energy, Air Quality Division (EGLE-AQD) administrative rules (Rules 336.1627 & 336.1606 / 336.1703).

During the inspection, Ms. Latonya Johnson (Phone: 248-547-6890), Manager, Speedway Gas Station #8814, 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.

Rule 627: Pursuant to Rule 336.1627, vacuum / pressure (US EPA RM 27), the vacuum / pressure test for vapor tightness is required for all trucks delivering gasoline products; but not for diesel delivery trucks. .

When I arrived, on March 3, 2021, at the site at Speedway Gas Station #8814, Oak Park, the loading of the gas station tank (dropping a load) was NOT in progress as there was no gasoline delivery truck during the inspection. I asked Ms. Jonson to maintain at all times the spill buckets clean: free of debris, gasoline, and water. I also advised Ms. Jonson of importance of connecting a vapor balance system properly in a leak-proof and spill-proof manner.

Two-point (Dual-point): vapor and liquid lines connections.

Spill containment / spill bucket: Clean.

Submerged fill pipe: Present.

I walked around the Speedway #8814 site and I did not find any remediation work.

Conclusion

Speedway #8814 is in compliance.

NAME *J. S. Marshall* DATE March 10, 2021 SUPERVISOR *Joyce*