

DEPARTMENT OF ENVIRONMENTAL QUALITY
 AIR QUALITY DIVISION
 ACTIVITY REPORT: Scheduled Inspection

P0227
 FY2016 Insp

P022732945

FACILITY: AGFA BP GAS	SRN / ID: P0227
LOCATION: 47407 7 MILE RD, NORTHVILLE	DISTRICT: Southeast Michigan
CITY: NORTHVILLE	COUNTY: OAKLAND
CONTACT: Roy Zaher, Owner	ACTIVITY DATE: 01/08/2016
STAFF: Iranna Konanahalli	COMPLIANCE STATUS: Compliance
SUBJECT: FY 2016 scheduled inspection of the above Gasoline Station - Agfa Enterprises or Agfa Gas, Inc.	SOURCE CLASS: MINOR
RESOLVED COMPLAINTS:	

P0227 - SAR - 2016 01 08

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 to evaluate the gas station's compliance with NESHAP / MACT 6C.

Terminal:

NA

Transporter:

NA

Gasoline Trailer License No.: NA

Trailer No.: NA

Driver: NA

Gasoline Delivery at:

Agfa Enterprises or Agfa Gas, Inc. (P0227)
BP Gas Station
47407 7 Mile Road (at Beck Road)
Northville, Michigan 48167-9208
Ph: 248-348-0077 Mr. Roy Zaher, Owner

On January 08, 2016, I conducted a level 2 **scheduled** inspection of the above Gasoline 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, Mr. Roy Zaher, Owner, assisted me via phone. Mr. Mohamed Harajli (Phone: 313-766-8594), Store Clerk, was also present.

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.

During FY2016 scheduled inspection loading was not in progress. I explained to Mr. Zaher the requirements for the gas station during the loading:

1. Proper connection of a vapor balance system in a leak-tight manner
2. Making sure spill containments or buckets are dry and empty of all liquids (gasoline, water) and debris. Ensuring spill containments are promptly cleaned up if spills occur during loading.
3. Ensuring that submerged fill pipe is not damaged
4. Ensuring tank truck has passed vapor-tightness test (required annually) according to Rule 336.627

AQD issued April 4, 2011, Violation Notice. Refer to the notice for additional details.

Conclusion

AQD issued April 4, 2011, Violation Notice.

FYI: April 04, 2011, VN

April 4, 2011

Mr. Roy Zaher, Owner

Mr. Greg Barrick, Gen. Manager

Agfa Gas Inc., BP Gas Station
 47407 7 Mile Road
 Northville, MI 48167-9208

B & R Trucking Company
 Barrick Enterprises
 4307 Delemere Court
 Royal Oak, Michigan 48073-1809

SRN: P0227, Wayne (82) County

Dear Zaher & Mr. Barrick:

VIOLATION NOTICE

On March 24, 2011, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of Agfa Gas Inc., BP Gas Station ("Agfa BP Gas" or "Agfa") located at 47407 7 Mile Road, Northville, Michigan 48167-9208, Michigan. The purpose of this inspection was to determine Agfa's compliance with the requirements of the federal Clean Air Act; Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451); and the administrative rules.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
<p>One gas tank, the submerged fill pipe (liquid line), the vapor balance system</p> <p>One of two tanks filled had gasoline spill problem. One of two spill containments had 5 gallons of gasoline and the other had 3 gallons of water.</p>	<p>Rule 336.1606 (3) / 336.1703 (2)</p>	<p>Broken / worn-out submerged fill pipe fittings or leaky fittings resulting in improper operation of vapor balance system during product loading or dropping into the gas station's underground tank as indicated by gasoline liquid standing 6-gallon spill containment. The liquid gasoline (about 5 gallon) from the spill containment would eventually evaporate to ambient air resulting in emissions of Volatile Organic Compounds (VOC).</p>
<p>One gas tank, the submerged fill pipe (liquid line), the vapor balance system</p> <p>One of two tanks filled had gasoline spill problem. One of two spill containments had 5 gallons of gasoline and the other had 3 gallons of water.</p>	<p>Rule 336.1910</p>	<p>Broken / worn out submerged fill pipe fittings or leaky fittings resulting in improper operation of vapor balance system during product loading or dropping into the gas station's underground tank as indicated by 5 gallon gasoline liquid standing in the spill containment that would eventually evaporate to ambient air resulting in emissions of Volatile Organic Compounds (VOC).</p>
<p>Owner or Operator means any person who owns, leases, operates, controls, or supervises a facility subject to regulation under the CAA, or a stationary source of which a regulated facility is a part. Hence, all companies / entities / persons referenced in this letter are owners or operators, who are responsible for compliance with Act 451 and CAA.</p>		
<p>Spilled gasoline (up to 5 gallons) into the spill containment must be managed as waste. It</p>		

must be pumped out immediately and stored in a closed container. The gasoline may eventually be recycled after treatment to bring it up to the gasoline quality standards. It may be noted that when a spill containment has liquid in it (either water or gasoline), it will not be able to contain spills that will occur and its purpose will be defeated. One of the two spill containments had 3 gallons of water. All liquids must be promptly removed from the spill containments.

On March 24, 2011, the AQD staff observed operation of the gas tank loading while the gasoline vapor balance system was malfunctioning due to defective submerged fill pipes (liquid line) or defective fittings with co-axial (4" diameter green liquid line and 2" diameter grey vapor line) Stage I vapor recovery system. This constitutes a violation of Act 451, Rule 910, which requires that air-cleaning devices, including the submerged fill pipe (co-axial) and the vapor balance system, shall be installed, maintained, and operated in a satisfactory manner and in accordance with the administrative rules and existing law.

The broken / worn-out submerged fill pipes or fittings (liquid) resulted in excess gasoline (up to 5 gallons for one containment) standing in the containment. I confirmed that the standing liquid was gasoline using a dip stick. The standing gasoline would eventually evaporate to ambient air resulting in emissions of Volatile Organic Compounds (VOC). One of two spill containments was filled with gasoline and the other had water standing. All liquids (gasoline or water) disable the function of a spill containment; i.e. to prevent gasoline spill on the concrete surface.

Mr. Mark Yuri Nehanivi, a driver, did not clean up the spilled gasoline stating that it was a responsibility of the owner of the BP gas station.

Please initiate actions necessary to correct the cited and submit a written response to this Violation Notice by April 25, 2011 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the occurred; an explanation of the causes and duration of the ; whether the ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

If Agfa believes the above observations or statements are inaccurate or do not constitute violations of the applicable legal requirements cited, please provide appropriate factual information to explain your position.

Thank you for your attention to resolving the cited above and for the cooperation that was extended to me during my inspection of Agfa . If you have any questions regarding the or the actions necessary to bring this facility into compliance, please contact me at the number listed below or the DEQ, Air Quality Division, Southeast Michigan District Office, 27700 Donald Court, Warren, Michigan 48092-2793.

Sincerely,

Iranna Konanahalli

Air Quality Division
586-753-3741

IK:VL

cc: Ms. Teresa Seidel, DEQ
Mr. Thomas Hess, DEQ
Mr. Christopher Ethridge, DEQ
Ms. Wilhemina McLemore, DEQ
Mr. Paul Owens, DEQ
Mr. Steve Weis, DEQ

NAME Steenahall DATE 01/13/2016 SUPERVISOR CJE