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

FY2015 Insp-

U82150408329433

FACILITY: BP Gas Station, B & A Fuel, Inc.	**SRN / ID:** U821504083
LOCATION: 4125 E. 8 Mile Road	**DISTRICT:** Detroit
CITY: Detroit	**COUNTY:** WAYNE
CONTACT:	**ACTIVITY DATE:** 05/01/2015
STAFF: Iranna Konanahalli **COMPLIANCE STATUS:** Compliance	**SOURCE CLASS:**
SUBJECT: FY 2015 inspection of Gasoline Trailer and Gas Station: BP Gas Station (B & A Fuel, Inc.) & Barrick Enterprises (B & R Trucking, Inc.)	
RESOLVED COMPLAINTS:	

U82 15 04083_SAR-2015 05 01

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:

Barrick Enterprises
B & R Trucking, Inc.
4307 Delemere Court

Royal Oak, Michigan 48073
Phone: 313-530-1656 Paul Jackson

Gasoline Trailer License No.: C665925 Michigan
Trailer No.: 135

Driver: Mr. Gary Joseph Langland (DOB: 02/11/1979)

Gasoline Delivery at:

BP Gas Station (U-82-15-04083)
B & A Fuel, Inc.
4125 E. 8 Mile Road
Detroit, MI 48234-1014

On May 01, 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 Detroit, 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. Simultaneously, two liquid lines were connected.

Vapor manifold: Manifold vapor line for simultaneous loading of multiple tanks.

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.

Spill containment / spill bucket: I asked the gas station attendant and the driver to clean up

water from the bucket.

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 August 05, 2014, at Paul's Vapor Repair, Inc. (313-530-1656), 20532 Pennsylvania Road, Taylor, Michigan 48180.

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. One spill bucket had water.

NAME [signature] DATE 05/15/2015 SUPERVISOR CJE