

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

P0227
FY2016 Insp-

P022736420

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: 08/19/2016
STAFF: Iranna Konanahalli	COMPLIANCE STATUS: Compliance
SUBJECT: FY 2016 inspection of AGFA Gas Inc., BP Gas Station	SOURCE CLASS: MINOR
RESOLVED COMPLAINTS:	

P0227-SAR-2016 08 19

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.: D431281 Michigan
Trailer No.: 161**

Driver: Mr. Michael Ryan Rennie (DOB: 10/01/1983)

Gasoline Delivery at:

**AGFA Gas Inc., BP Gas Station (P0227)
47407 7 Mile Road
Northville, MI 48167-**

On August 19, 2016, 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 Northville, the loading of the gas station tank (dropping a load) was in progress.

Co-axial (not Dual-point; not Two-point) vapor and liquid lines connections were used. One liquid and one vapor lines were connected. Regular (Octane 87) gasoline product was dropped to only one tank.

Vapor manifold: Manifold vapor line for loading of tank was properly connected.

Vapor balance system: During gasoline loading, the vapor balance system was operated properly. Coaxial vapor and liquid lines were connected properly.

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: Empty. The driver properly poured liquid gasoline remaining in the hose to the tank.

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 April 25, 2016, at Heil Trailer International (423-745-5830), 1125 Congress Parkway, Athens, Tennessee 37303. Obviously, this is a brand new truck tank since first vapor tightness test was conducted at the manufacturer's facility.

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 involved was empty.

NAME J. Stenmahall DATE 09/09/2016 SUPERVISOR Joyce St

