

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

N800229693

FACILITY: NEXT DOOR OPERATIONS, LLC - SOIL REMEDIATION SYS		SRN / ID: N8002
LOCATION: STORE #12 493 E MAIN ST, FARWELL		DISTRICT: Saginaw Bay
CITY: FARWELL		COUNTY: CLARE
CONTACT: John Veldhuis, P.E.		ACTIVITY DATE: 05/29/2015
STAFF: Sharon LeBlanc	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: scheduled inspection.		
RESOLVED COMPLAINTS:		

On May, 29, 2015, AQD District Staff conducted a scheduled inspection of the Next Door Operations LLC, Soil Remediation Site located at 493 East Main Street, Farwell, Clare County, Michigan (SRN N8002). The facility is an active gas station.

One active permit issued to Next Door Operations LLC (N8002) (69-08) is of record for the system presently being operated onsite.

Site inspection was conducted with the intent of determining compliance with the most recent permit. The system was down upon arrival, per Compliance Inc. staff the Soil Vapor Extraction (SVE) portion of the facility has not been operated since apx. September 2011, and the air sparge portion of the system had been down since the beginning of the year.

Mark Peterson of Compliance Inc. the present remediation contractor was present onsite during AQD inspection activities. Mr. John Veldhuis, Project Manager of Compliance Inc. provided copies of R-2 (or equivalent) reporting forms for the system.

FACILITY DESCRIPTION

Located at 493 East Main Street, Farwell, Clare County, Michigan (SRN N8002). The facility is an active gas station located on the east end of town in a mixed use area. The facility is bounded immediately to the north by East Michigan Street, private residences and the local school. Properties located to the south across Main Street include both residential and commercial properties. Properties to the east (across Merrill Street) and to the west of the facility consist of private residences.

The onsite remediation activities were initiated to address impacted soil and groundwater in the former tanks area, and were initiated in approximately 1995. At that time the property was owned by Imperial Oil Company, and an air permit was obtained for onsite remediation activities. The property was sold to Next Door Operations, LLC in 2007. The present contractor took over remediation activities at the site with the installation of the present system (FG-REMEDIATION).

FG-REMEDIATION is housed in a secure structure, located at the northeast corner of the retail store. The system is a low-flow air sparge (AS) and VES (AS/VES). Equipment associated with FG-REMEDIATION consists of:

- One compressor and pressure tank for AS,

Note that the 7.5 HP Eaton compressor originally installed has since been replaced with a 5 HP Champion compressor.

- One knock out pot for entrained water from the VES,
- One blower for the VES,
- 16 sparge points and two vapor extraction lines with independent gauges.

Each set of 8 points are reported to be operated alternately from the other set. Volumetric flow through

each of the vapor extraction lines had historically reported to be 14 cubic feet per minute, which was lower than the anticipated operation rate. Compliance Inc. Staff reported that upon start-up activities and subsequent operational activities indicated that the system was able to achieve vapor flow thru the vadose soils at lower rates than anticipated.

No distressed vegetation, particulate matter, emissions or odors were noted during the site visit. No obvious staining to soils was noted.

COMPLIANCE EVALUATION

Evaluation of compliance was made with respect to conditions of General Permit 69-08, and was based on conditions noted during site inspection activities

Operating Status - FG-REMEDATION was not operating upon arrival. Compliance Inc. Staff were present onsite to answer questions regarding the system operation, as well as to conduct repair activities for the system. As previously noted the VES portion of the remedial activities have not been operating since apx. September 2011. The air sparge portion of the facility, more recently has been operating as a microsparge system.

Material Use - The equipment associated with FG-REMEDATION is electric powered.

Emission Point - One emission point is associated with FG-REMEDATION. The unobstructed stack is composed of PVC and extends a minimum of 20 feet above grade. No control devices are associated with FG-REMEDATION, extracted vapors from the VES system when operating are discharged directly out the stack. Stack height appears to be in general compliance with permit conditions.

With reference to conditions requiring a minimum exit velocity of 30 ft/second from the stack. As no VES activities have been conducted since September 2011, so the minimum exit velocity requirements do not apply under the present conditions.

Total VOC Emissions for the period of October 2010 thru September 2011 was reported to be approximately 62.43 lbs. Well below permit limits of 10 tons of Total VOCs and 1 ton of BTEX annually. Based on the reported concentrations no emission control device is required.

Monitoring and Testing - Monitoring and testing requirements associated with FG-REMEDATION include records regarding malfunction or maintenance of any emission control equipment associated with the facility/system. As previously noted, no control equipment is present onsite, so no records would be kept for the absent equipment.

Under the General permit for this facility, four weekly, 5 monthly and subsequent quarterly sampling per EPA Method 18 is required for system effluent. A review of the Appendix R-2 spreadsheet as part of the March 11, 2010, inspection indicated that initial sampling had been conducted each calendar week, meeting the weekly sampling conditions. A review of sampling activities for the next 6 sampling events indicated that "monthly" sampling events were conducted at approximately every 1.5 months, for the required 5 events, after which sampling activities were conducted within each calendar quarter as required. Copies of analytical data provided indicated that the analytical method used was EPA Method 18, as required.

As part of the May 29, 2015, site inspection, VES sampling data from March 3, 2010 through September 30, 2011, was reviewed for compliance. Data provided indicated that with the exception of samples collected on October 5, 2010, all sampling was conducted within each calendar quarter as required and that all sampling was conducted for the appropriate analytical method.

Reporting - Under the General Permit, the permittee is required to keep monthly and annual records of total VOC, gasoline and/or BTEX emissions from FG-REMEDATION. Copies of the Appendix R-2 forms summarizing emissions were provided, upon request. Compliance Inc. provided emission data for total VOC emissions. As BTEX compounds are constituents of total VOCs, and no exceedances of Total

VOCs were reported, permit requirements were met.

Other Requirements - Under the General Permit, the permittee is required to update the general permit by submitting a new Process Information form (EQP578) a minimum of 10 days before the replacement or modification of any control devices or installation of additional remediation processes (Special Condition IX.1(a)). More recently issued General Permits under the referenced special condition require submittal of the referenced form for replacement or modification of any portion of FG-REMEDIATION. As previously noted a switch out to a smaller electric compressor has been made onsite. Under the General Permit issued, no notification of the equipment switchout was required as the compressor does not represent a control device.

Summary- Compliance Inc. Staff reported that with the exception of the replacement of the Eaton Compressor with the smaller Champion Compressor no additional remediation equipment had been added to the system. Total emissions reported were well below permit limits for Total VOCs.

Based on information obtained as part of the May 29, 2015, site visit and compliance evaluation the facility appears to be in general compliance with the conditions of the permit.

NAME Shawn St. Blac

DATE 6/9/15

SUPERVISOR C. Ware