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

P000727529

FACILITY: Speedway SuperAmerica LLC (SSA #2238)		**SRN / ID:** P0007
LOCATION: 2255 Crooks Rd, ROCHESTER HLS		**DISTRICT:** Southeast Michigan
CITY: ROCHESTER HLS		**COUNTY:** OAKLAND
CONTACT: Dave Reinhold , Project Geologist		**ACTIVITY DATE:** 02/03/2014
STAFF: Rebecca Loftus	**COMPLIANCE STATUS:** Compliance	**SOURCE CLASS:** Minor
SUBJECT:		
RESOLVED COMPLAINTS:		

On February 3, 2014, I, Rebecca Loftus, from the Department of Environmental Quality's (DEQ's), Air Quality Division (AQD), conducted an inspection of Speedway Super American LLC, SRN: P0007, located at 2255 Crooks Road, Rochester Hills, Michigan. The purpose of the inspection was to determine the facility's compliance with the requirements Michigan's Air Pollution Control Rules, the Federal Clean Air Act, Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act of 1994, PA 451, as amended, and Permit to Install (PTI) No. 271-09. I arrived on-site at 1:10pm and met with Mr. David Reinhold, Project Geologist.

PTI No. 271-09
On December 1, 2009, the AQD issued PTI No. 271-09 to Speedway Super American LLC for the operation of an SVE system with a catalytic oxidizer as control.

The permit has record keeping requirements which include temperature of the oxidizer, VOC influent concentrations, flow, and emission calculations (see permit for details). The catalytic oxidizer, must have a 97% destruction efficiency, maintain a temperature of 626°F (330°C), and have an automatic shutdown device for low temperature. The following emission limits are also established: 10 Tons/year VOC and 1.0 Ton/year BTEX.

During my inspection, Mr. Reinhold explained the SVE system and that the scope of the project which is estimated at 3-5 years. Currently, the site is operating five of the six extraction wells and a Falco 300 catalytic oxidizer. At the time of inspection, four wells were open and the oxidizer was operating at the following temperatures: T1 (Bed Entry) was 330°C, T2 (Bed Exhaust) was 370°C, T3 (Bed Interior) was 337°C. Mr. Reinhold explained that an alarm system has been installed and will shut down the system if the oxidizer falls below 330°C or if the exhaust temperature is too high. The SVE system's hour meter was at 1126 hours.

During my inspection, Mr. dunning provided me with copies of the site's emission calculations, operation and maintenance log for the SVE system and oxidizer, and the analytical results for air and water samples (see attached). Lishba Varughese, from the DEQ's Water Resource Division is responsible for the water discharged from the site.

From November 2013 through January 2014, air samples were taken on a weekly basis and Cardno recorded the following emissions: 11.90 lbs BTEX and 528.91 lbs of total petroleum hydrocarbons. The records also indicate that the catalytic oxidizer is being maintained above 626°F when in operation.

Conclusions
Based on information gathered, at this time, Speedway Super American LLC's SVE system appears to be in compliance with the conditions of PTI No. 271-09, Michigan's Air Pollution Control Rules, and the Federal Clean Air Act.

NAME Rebecca Loftus DATE 2/14/14 SUPERVISOR CTE