

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

U8114146727487

FACILITY: Ann Arbor Transportation Authority		SRN / ID: U81141467
LOCATION: 2700 S. Industrial Highway, Ann Arbor		DISTRICT: Jackson
CITY: Ann Arbor		COUNTY: WASHTENAW
CONTACT:		ACTIVITY DATE: 10/02/2014
STAFF: Glen Erickson	COMPLIANCE STATUS: Compliance	SOURCE CLASS:
SUBJECT: Inspection of facility with Scott Miller, AQD Jackson District Supervisor, and meeting to discuss Maintenance Manager Terry Black's corrective action program he is implementing to mitigate and resolve odor problems resulting in VN of 8-21-14.		
RESOLVED COMPLAINTS:		

Scott Miller, AQD Jackson District Supervisor and I met with Terry Black, Maintenance Manager to inspect facility and to discuss his corrective action program he is implementing to resolve the VN sent 8-21-14 by AQD regarding on-going odor problems from the pumping down and power washing of the oil/water separator tanks at the AAATA facility.

His written response of 9-8-14 to the VN was not very specific about how and when he would contract with an environmental consulting firm to assist him in finding a solution to his wastewater odor problem that appears to have been going on for years. It appears that during the vacuum cleaning and pump out of the oil/water separator tanks, generally 3 times per year for a period of about 1/2 day to 2 days, that odors are generated which cause numerous reports to DTE-MichCon of suspected natural gas leaks, and on occasion, specific reports from nearby offices such as the Great Lakes Commission office across S. Industrial from AAATA that personnel were experiencing suspected health effects from the sulfurous odors.

Discussed with Black the environmental consultant's list developed by DEQ Office of Environmental Assistance as a possible starting point for his developing a request for proposal.

We inspected facility so Miller would have a clearer idea of the possible elements contributing to the odor problem.

Black showed us the bus wash, and the chassis wash and provided MSDS for the 2 types of cleaning detergents used in these systems. They operate a small wastewater recycling system attached to the bus wash stations in order to reduce the amounts of fresh water that they need. Appears that some amount of sludge is settled out here. The discharge drains to the oil/water separator tanks, and then on to the sanitary sewer.

We discussed with Black the need to evaluate possible alternatives to his current cleaning detergents, as well as, changes to the operation of his wastewater recycling system as potential elements of his odor control program.

We told Black to keep us updated on his proposal development, and stressed the need to move quickly so that mitigative actions could potentially be employed to reduce odor impacts from his next pump-out, scheduled for early December. A long term solution to the odor problem may take time beyond December, especially if it involves equipment or process modifications.

Miller and I left Black and proceeded to make contact with the complainant, Victoria Pebbles, Program Director, Great Lakes Commission, located on the east side of S. Industrial, across the street from AAATA.

We informed Pebbles of our enforcement activities with AAATA in which AQD issued a Violation Notice for a violation of our general nuisance Rule 901, based on the on-going nature of the odor problems associated with AAATA's pumping out of their oil/water separator tanks. The 8-14-14 pump-out event which generated her complaint concerning odors, and/or suspected health-related impacts to herself and her office staff, also generated 29 citizen calls to DTE-MichCon for suspected natural gas leaks.

We described how AAATA has responded to the VN with a corrective action program that involves a commitment to enlist the assistance of a professional environmental consultant with expertise in wastewater problem resolution, and air pollution control. We informed her that this resolution would

take some time to implement, and that we were pressuring AAATA to achieve some mitigative odor control progress before their next scheduled pump-out event for early December. A comprehensive resolution to the problem will certainly take time beyond December, but we are confident that a long term solution will be achieved. We said we would continue to keep her informed of the company's efforts to resolve this VN.

NAME GLEN ERIKSSONDATE 8-15-14SUPERVISOR 