

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

U8114146732656

FACILITY: Ann Arbor Transportation Authority		SRN / ID: U81141467
LOCATION: 2700 S. Industrial Highway, Ann Arbor		DISTRICT: Jackson
CITY: Ann Arbor		COUNTY: WASHTENAW
CONTACT: Terry Black , Manager of Maintenance		ACTIVITY DATE: 12/17/2015
STAFF: Zachary Durham	COMPLIANCE STATUS: Compliance	SOURCE CLASS:
SUBJECT: Scheduled, announced inspection of unregistered facility with previous odor issues.		
RESOLVED COMPLAINTS:		

Contact

Terry Black, Manager of Maintenance
tblack@theride.org
 (734)794-1750

Purpose

This was a scheduled inspection on site at the Ann Arbor Transportation Authority (AATA) to determine compliance with Michigan Air Pollution Control rules and regulations. I arrive at the facility at about 2:45pm on Thursday, December 17, 2015. The facility is unregistered in our system and doesn't have any active or voided air use permits. I met with John Edmunds upon arrival and Terry Black after a facility tour.

Background

This site has been the cause of nuisance odors in the past because of waste water hauling. Wastewater is generated from the washing and maintenance of the bus fleet. Complaints are generally received in the summer months when people are outdoors and the warm months have a larger impact on odors released. The close proximity to a DTE facility also falsely generates concern of natural gas leaks in the area, which have been communicated to both the AQD and DTE. Complaints have also been received from the nearby Great Lakes Commission.

The facility was issued a violation notice (VN) on 8/21/14 because of the excessive odors in order for corrective action to be pursued by AATA. Prior to this VN, the company would haul out the wastewater twice per year. Terry Black indicated that the biannual removal usually consisted of a single truck making about two trips. There have not been as many complaints received since this VN was issued and an attempt at resolution began.

Compliance Evaluation

During my inspection I observed several buses parked in a maintenance area receiving routine work. I was also shown the bus washing system, which looked similar to a standard automated car wash, only sized appropriately for a city bus. The water and other contaminants eventually drain into a holding tank where it is pumped out and removed.

Terry informed me that in order to resolve the VN they worked with a consulting company, Inland Waters (possibly HydroChem now), to implement a solution. They have doubled their frequency of evacuating their wastewater tanks, bringing it up to four times per year, or quarterly. This has the added benefits of reducing the residence time in the tank as well as only requiring one truck for pump out events. They have also been adding simple green to the load out truck in an attempt to mitigate any objectionable odors.

I also observed a number of cold cleaners in the bus maintenance area; John indicated that they have nine which use Safety-Kleen solutions. Safety-Kleen products do not contain halogenated solvents, which are a source of HAP and cause of concern for the AQD. Several of the stations were open at the time of the inspection and I informed him that each unit is exempt from permitting but should be kept closed while not in use. I provided John with 10 of the cold cleaner stickers that contains the detailed cold cleaner rule as well as highlighted best practices on the label.

Compliance Status and Recommendations

I have determined that this facility is in compliance.

I recommend another site visit during the time of a pump out event in order to observe the process they have contracted out. This would help to determine if the solution implemented is achieving the desired result.

Additionally, I recommend that the cold cleaner stickers be applied to the units or employees using them are informed that they shall close them between uses.

NAME Fach Durham

DATE 12/22/15

SUPERVISOR B