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

N383645894

FACILITY: Millers Short Stop		SRN / ID: N3836
LOCATION: 8634 Center Road, MAPLE CITY		DISTRICT: Cadillac
CITY: MAPLE CITY		COUNTY: LEELANAU
CONTACT:		ACTIVITY DATE: 08/02/2018
STAFF: Caryn Owens	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: Scheduled Inspec	tion	
RESOLVED COMPLAINTS:		

On Thursday, August 2, 2018 Ms. Caryn E. Owens of the DEQ-AQD conducted a scheduled inspection of Miller's Short Stop located at 8634 Center Road in Maple City, Michigan (SRN: N3836). The field inspection and records review were conducted to determine compliance with Permit to install (PTI) 537-92A. The site is currently a minor source, and not subject to Federal Regulations.

Evaluation Summary

Based on the activities covered during this field inspection, the facility appears to be in compliance with PTI 161-05. Review of the records for the facility indicates the facility was in compliance with emission limits in accordance with the current PTI. No further actions are necessary at this time. Specific permit conditions that were reviewed are discussed below.

Source Description:

During the field inspection it was cloudy, approximately 71°F, with calm winds from the north. The site consists of an active gasoline station with a convenience center and an area with covered pump stations. The soil vapor extraction (SVE) and air sparge systems were located in a pole barn building on the northern portion of the site. I was able to see the system through the windows at the site, but the system was not operating. Based on discussions with the DEQ Remediation, Redevelopment Division (RRD) the remediation system has been off since prior to 2008.

A stack was located on the western portion of the building extending approximately 22 feet above ground surface. Based on the facility diagrams in the PTI file, the existing stack appears to be in a separate location than the stack in the diagram, and there appeared to be a patch in the roof of the pole building in the location that was proposed on the diagram. I was not able to determine if the stack on the western portion of the pole building was connected with the SVE and air sparge system. No visible emissions or odors were present during the inspection. An aerial photograph is attached for reference.

The original release at the site was due to a release from an underground storage tank system that impacted the soil and groundwater in the area. The soil vapor extraction (SVE) system began operating in 1991 and was monitored on a daily basis, and the exhaust gas would flow through a carbon canister for control, and the facility would monitor the exhaust gases for breakthrough to know when to replace the carbon canister. Operations included air sampling the influent, intermediate, and effluent sample ports on a monthly basis.

Compliance Evaluation:

<u>Special Condition (SC) 15:</u> Visible emissions from the SVE system shall not exceed 0% opacity. As previously stated, the SVE and Air sparge system was not operating during the field inspection, therefore, no opacity was observed onsite.

- <u>SC 16:</u> The operations at the facility haven't operated in many years. AQD attempted to receive the most recent records for the facility, but it has been prior to 2008 since the system has operated, and the records could not be located at this time.
- <u>SC 17:</u> Verification of VOC emission rates from the system and control through testing may be requested by AQD. As of the date of this inspection report, AQD has not requested verification of emission rates at the facility.
- <u>SC 18:</u> The permittee shall not operate the system unless the control is installed and operating properly. At the time of issuance of this PTI, the facility captured the exhaust and control air emissions using a carbon canister.
- SC 19: The permittee shall monitor and record the flow rate and total VOC concentration of the influent

stream. The system is not currently operating and hasn't operated since prior to 2008.

SC 20: The exhaust gases from the system and control shall be discharged unobstructed vertically upwards to the ambient air from a stack with a maximum diameter of 18 inches at an exit point not less than 32 feet above ground level. During the inspection, AQD observed a stack potentially associated with the SVE system, however, the stack was approximately 22 feet above ground surface, and contained a rain cap. If the system were to begin operating again, the cap would need to be removed and a verification of the stack height would be necessary.

<u>SC 21:</u> The permittee shall monitor the control for breakthrough and shall immediately replace the control or shut down the SVE unit if breakthrough is detected. It has been a while since the system has operated, and therefore this Condition is not applicable at this time.

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