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DEPARTMENT OF ENVIRONMENTAL QUALITY AIR QUALITY DIVISION

ACTIVITY REPORT: Scheduled Inspection

P024848863		
FACILITY: AT&T MICHIGAN-JACKSON		SRN / ID: P0248
LOCATION: 1041 HURST ROAD, JACKSON		DISTRICT: Jackson
CITY: JACKSON		COUNTY: JACKSON
CONTACT: Steve Newlin , Consultant		ACTIVITY DATE: 05/14/2019
STAFF: Stephanie Weems	COMPLIANCE STATUS: Compliance	SOURCE CLASS: Minor
SUBJECT: Scheduled Inspection	of historic remediation site.	
RESOLVED COMPLAINTS:		

Minor Source Inspection - AT & T Michigan (P0248)

Facility Contacts:

Facility Contact: Steve Newlin - APEX Companies

Phone: 847-956-8589 x 3210 Email: snewlin@apexcos.com

Purpose

On May 14, 2019 I conducted an unannounced compliance inspection of AT & T Michigan – a remediation site located at 1041 Hurst Rd., Jackson, Ml. The purpose of the inspection was to determine the facility's compliance status with the applicable federal and state air pollution regulations, particularly Michigan Act 451, Part 55, Air Pollution Control Act.

Facility Location

The facility is located in an industrial park in Jackson County. See Image 1 for an aerial photo.

Facility Background

This is a remediation site located at an AT & T office building. Historically, air sparging was the remediation method that has been used at the site.

Regulatory Applicability

AT & T Michigan was issued a General PTI for Remediation Processes under PTI 91-11. The PTI was voided in 2015

The site was last inspected on April 20, 2012, and it was found to be in compliance.

Arrival & Facility Contact

I arrived at approximately 9:55 AM.

No visible emissions or odors were observed upon my approach to the facility.

Onsite Inspection

I drove around the parking lot and back and forth along the road adjacent to the building. Upon inspection of the area, it appeared that the trailer and remediation equipment had been removed from the site.

I departed the area at 10:00 AM.

Post-Inspection Correspondence

On May 16, 2019 I spoke with Indu Jayamani of EGLE's Remediation and Redevelopment Division in the Jackson District Office to inquire about the status of the site. She indicated that remediation was still occurring at the site and provided me with Steve Newlin's contact information, stating that he is the consultant working at the site.

I spoke with Steve on May 16th. He indicated that his consulting firm, Apex, took this site over from a different consulting firm. Upon acquiring this site, they determined that the air sparging system was not effective in the remediation of the site, and they changed to using an injection process. Steve inquired about whether an air permit would be needed for the site. I told him I would look into it and let him know.

On May 28th, Indu informed me that the site is currently using RegenOx with Direct Push injections. This process uses a slurry that is injected into the ground to destroy contaminants by means of chemical reactions. She included a 144-page attachment of the site's Assessment Report from when the remediation efforts were taken over by Apex. A few of the pages of that report are included with this inspection report in the file. This assessment indicates that the air sparging system ended operation around February 2017.

Additionally, I consulted with Michelle Rogers and Andrew Drury in the AQD permit section on whether this type of process might need a permit, or if we have ever issued a permit for something like this. They indicated that they were not familiar with the process, and if the process has no release of air contaminants a PTI would not be needed.

I relayed this information to Steve on May 30, 2019.

Compliance Summary

Based upon the site inspection and correspondence outlined above, this site should be considered closed and removed from future inspection lists.

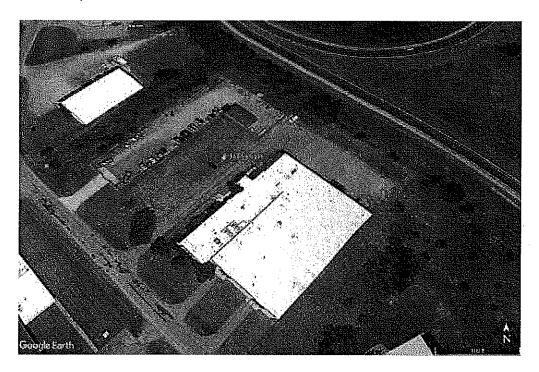


Image 1(1): Aerial view

NAME SUM WUW

DATE (1.7.10)

SUPERVISOR