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

P054043238		
FACILITY: BLARNEY CASTLE-BEULAH		SRN / ID: P0540
LOCATION: 85 N. BENZIE BOULEVARD, BEULAH		DISTRICT: Cadillac
CITY: BEULAH		COUNTY: BENZIE
CONTACT: Erik Johnson, Environmental Manager		ACTIVITY DATE: 01/11/2018
STAFF: Caryn Owens	COMPLIANCE STATUS: Compliance	SOURCE CLASS:
SUBJECT: Scheduled Inspect	ion and Records Review	
RESOLVED COMPLAINTS:		

On Tuesday, January 11, 2018, Ms. Caryn E. Owens of the DEQ-AQD conducted a scheduled inspection of the Blarney Castle Remediation site located at 85 North Benzie Boulevard, in Beulah, Benzie County, Michigan (SRN: P0540). More specifically, the site is just south of the North Benzie Blvd and North Michigan Highway (US-31) split in Beulah, Michigan. The field inspection and records review were conducted to determine compliance with General Permit to install (PTI) 129-14. The site is currently an area source for hazardous air pollutants (HAPs) and a minor source of criteria pollutants, specifically volatile organic compounds (VOCs), 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 129-14. 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.

On-site Inspection:

During the field inspection it was mostly cloudy, overcast skies, and approximately 55°F, with winds approximately 10 to 15 miles per hour from the south. The site consists of an operating gas station, a convenience store, and a shed on the northern portion of the site. At the time of the inspection, it sounded like the remediation system was operating, but the shed to the building was locked.

A PVC stack was coming out of the wall of the shed, and connected to a metal pipe for support on the southeast portion of the shed, and extended approximately 20 feet above ground surface. No visible emissions or odors were present during the inspection in the area of the SVE system. An electrical box was observed on the northern portion of the shed, with a readout panel, but there were error signals on the readout panel. AQD had discussions with DEQ Remediation, Redevelopment Division (RRD), who indicated there was not a lot of information for this site, but an Annual Groundwater Monitoring Report dated February 4, 2016 indicated the groundwater impact around the air sparge/soil vapor extraction wells was decreasing over time. RRD has received no additional reports from this site, since February 2016.

Compliance Evaluation:

FG-REMEDIATION: Includes air strippers, soil vapor extraction (SVE) systems, and air sparging systems; associated equipment and pollution control devices. For sources with total potential VOC or gasoline emissions greater than 10 tons per year and/or total potential BTEX emissions greater than 1 ton per year, a pollution control device shall consist of a dual stage granular activated carbon unit, a thermal oxidizer, and internal combustion engine with dual catalytic converters, or a biofilter in combination with one of the other controls listed in this paragraph.

Emission Limits:

Based on the most recent analytical results reviewed, the BTEX emissions were all "U" for undetectable. No other air permitted sources were located at this site that emitted BTEX, VOCs, or gasoline emissions.

Material Limits:

There are no applicable Material Limit Conditions for FG-REMEDIATION.

Process/Operational Restrictions:

The total VOC and gasoline emissions are not greater than 10 tons per year and the total BTEX emissions are not greater than 1 ton per year, therefore, this site does not control the air emissions from the SVE system. As of the date of this report, the site has not been closed by the DEQ-RRD, and is still operating.

Design/Equipment Parameters and Testing/Sampling:

There are no applicable Design/Equipment Parameters and Testing/Sampling Conditions for FG-REMEDIATION.

Monitoring/Recordkeeping:

The site does not contain an air stripper and therefore no Monitoring requirements for FG-REMEDIATION.

As previously stated, the system is still in operation and operates 10 to 12 hours per day. The facility collected three separate air samples for this system between November 2016 through December 31, 2017. The air sample results indicated that BTEX emissions were non-detect. The company was not able to complete all the quarterly sampling during 2017 because the system was shut down for maintenance. Additionally, when the system is operating the air volume flow rate is at 26 cubic feet per minute. The SVE system has been operating since September 2014.

Reporting:

There are no applicable Reporting requirements for FG-REMEDIATION.

Stack Restrictions

During the field investigation, the stack appeared to be at least 20 feet above ground surface. No visible emissions or odors were present.

Other Requirements:

No modifications or new additional remediation systems are present at the site.

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SUPERVISOR