

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION

ACTIVITY REPORT: Scheduled Inspection

D120841214

FACILITY: VFW NATIONAL HOME FOR CHILDREN		SRN / ID: D1208
LOCATION: 3573 SOUTH WAVERLY ROAD, EATON RAPIDS		DISTRICT: Lansing
CITY: EATON RAPIDS		COUNTY: INGHAM
CONTACT: Todd Marriott		ACTIVITY DATE: 08/18/2017
STAFF: Michelle Luplow	COMPLIANCE STATUS: Compliance	SOURCE CLASS:
SUBJECT: Scheduled, unannounced inspection to determine compliance with General PTI 282-03.		
RESOLVED COMPLAINTS:		

Inspected by: Michelle Luplow

VFW contact: Todd Marriott (tmarriott@vfwnationalhome.org)

Purpose:

Conducted an unannounced, scheduled compliance inspection of VFW Home for Children (VFW) to determine compliance with General PTI 282-03 for a soil vapor extraction system equipped with a catalytic oxidizer. There are no AQD files which indicate that this source has been inspected in the past.

Facility Background/Regulatory Discussion

VFW obtained the General PTI for a Wess CR-300 gasoline vapor extraction device to remove the gasoline vapors from the soil, which are then released to the ambient air (diluted) to produce concentrations of BTEX less than 0.228 lb/hr.

I worked with staff in the Remediation and Redevelopment Division (RRD) of the Lansing District Office to determine if remediation was still ongoing at this source, as well as retrieving contact information. Attached is RRD's most recent semi-annual groundwater monitoring report for this location (6/26/2017). Richard Villa and Steve Dehring, of Villa Environmental Consultants are in charge of the remediation project.

Steve Dehring provided me with the background information and current status of the soil vapor extraction (SVE) system. He provided me with a map of the locale including the location of the SVE, attached. He said that the SVE system has been out of service for approximately 10 years: it operated from June 4, 2004 through April 30, 2007, during which time 373 gallons of gasoline was removed. The SVE was used to remediate the non-aqueous phase liquids (NAPL) from the soils caused by a gasoline release from an underground storage tank on the property. The system was removed from service because NAPL were no longer detected. Based on semi-annual monitoring of the groundwater, they will be able to determine whether the system needs to be started again. During semi-annual monitoring, the groundwater is analyzed for unleaded gasoline via EPA Method 8260B. Air emissions were also analyzed by the same method using Tedlar bags.

There is currently no SVE processes being conducted. The stack that was once located on the north side of the building that houses the equipment has since been removed. The General PTI requires a stack oriented vertically upwards at least 1.5 times the height of the building in order to operate the equipment.

Inspection:

I arrived at VFW at approximately 10:30 a.m and met with two of VFW's Facilities employees. Rob, one of the employees, opened the small shed that the SVE equipment is housed in. Attached are photos of the equipment, including the pipe that was once attached to the stack outside of the building. The shed is now used for storage.

I will work with Todd Marriott and Villa Environmental Consultants to get PTI 282-03 voided if they believe they no longer need the SVE system, or if they do, that they reinstall the stack to meet the General PTI requirements.

VFW is currently in compliance with PTI 282-03 at this time.



Image 1(Stack Pipe) : Pipe was once attached to a stack. Stack has been removed.

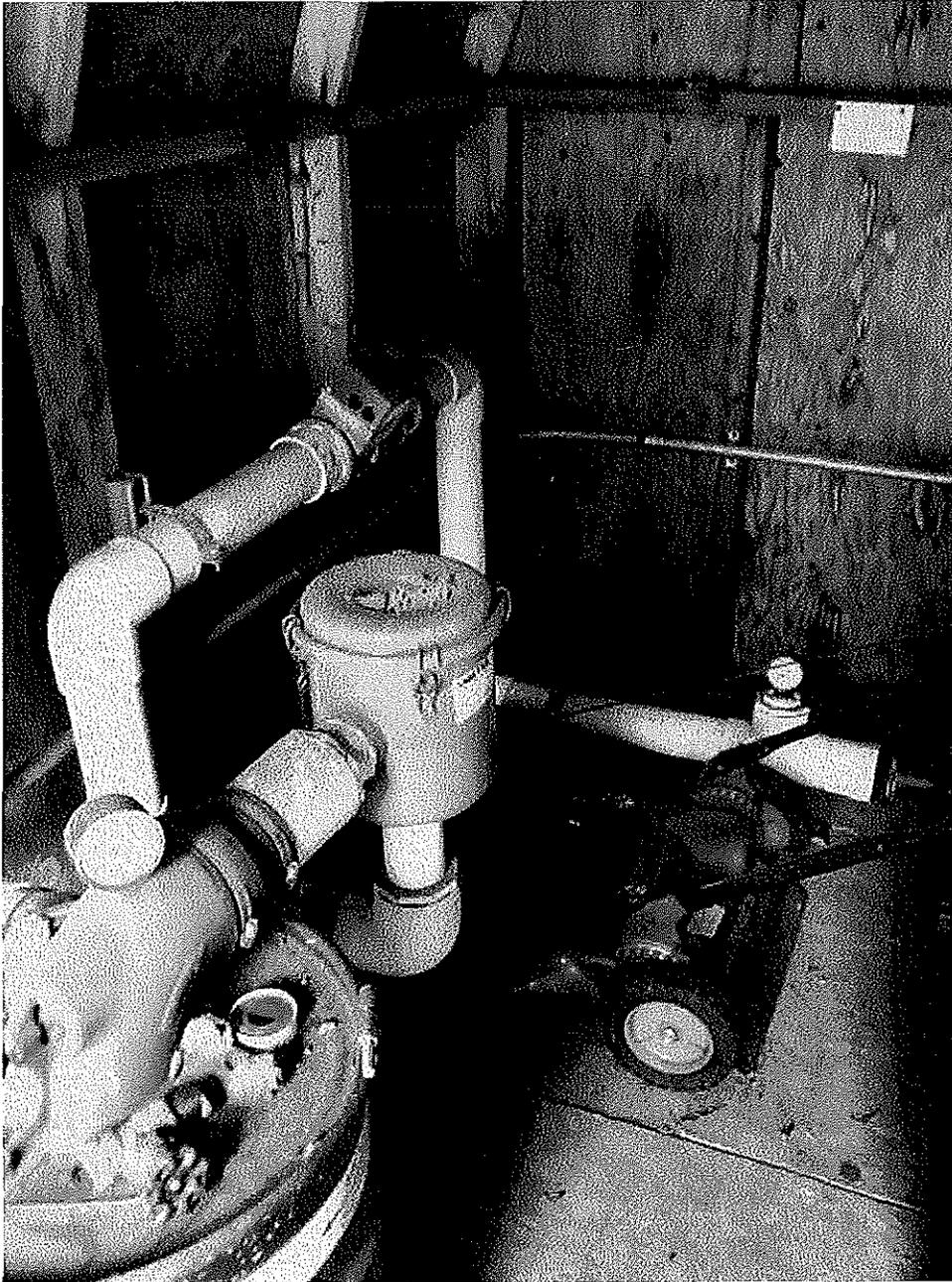


Image 2(SVE system) : Components of the SVE system

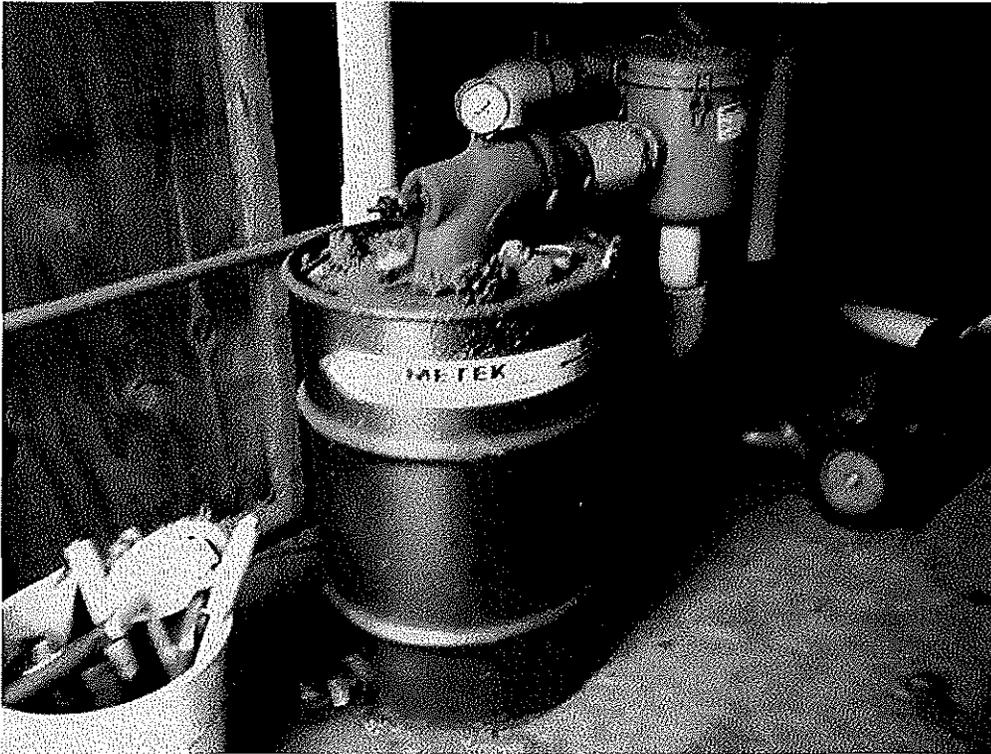


Image 3(SVE system) : Components of the SVE system



Image 4(SVE System) : Component of the SVE system which is attached to the pipe protruding out of the north side of the shed, once leading to the stack.

NAME Muellem Jones

DATE 9/29/17

SUPERVISOR B.M.





