H5921 MANILA

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

H592150748	- -					
FACILITY: Aevitas Specialty Services Corp.		SRN / ID: H5921				
LOCATION: 12680 BEECH-DALY, REDFORD TWP		DISTRICT: Detroit				
CITY: REDFORD TWP		COUNTY: WAYNE				
CONTACT: Greg Reichard, Environmental Manager		ACTIVITY DATE: 07/29/2019				
STAFF: Stephen Weis	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR				
SUBJECT: Compliance inspection of the General Oil Company/Aevitas Specialty Services Corporation facility in Redford Twp. The						
facility was added to my list of sources scheduled for inspection in FY 2019.						
RESOLVED COMPLAINTS:		· · · · · · · · · · · · · · · · · · ·				

Location:

General Oil Company/Aevitas Specialty Services (H5921) 12680 Beech-Daly Road Redford Township 48239

Date of Activity:

Monday, July 29, 2019

Personnel Present:

Steve Weis, EGLE-AQD Detroit Office

Purpose of Activity

A self-initiated inspection of the former General Oil Company/Aevitas Specialty Services Corporation facility site (hereinafter "General Oil") on Beech-Daly Road in Redford Township was conducted on Monday, July 29, 2019. The General Oil facility was included on my list of sources targeted for an inspection during FY 2019. The purpose of this inspection was to determine compliance of operations at the General Oil facility site with applicable rules, regulations and standards as promulgated by Public Act 451 of 1994 (NREPA, Part 55 Air Pollution Control), and with applicable Federal standards.

Facility Site Description

The General Oil facility property is located on the east side of Beech-Daly Road along the Northeast Service Road, between Glendale Street to the north and the CSX railroad right-of-way to the south. The facility's property consists of a roughly 1.25-acre parcel that stretches from the east side of the Service Road north up to Glendale. According to information from a commercial real estate website (LoopNet), the building structure that was most recently on the facility property was just over 5,361 square feet in area.

The area around the General Oil facility property includes a mix of uses. The areas immediately adjacent to the General Oil property are commercial and/or industrial in terms of zoning and usage. This is true of the properties located between Glendale and the railroad right-of-way both east and west of Beech-Daly. There are Steel Industries, Inc. facilities located on the north side of the railroad right-of-way on both the east and west sides of Beech-Daly; Franklin Fasteners on the west side of Beech-Daly; North Redford Towing at the southwest corner of Beech-Daly and Glendale; and a DTE Energy substation at the southeast corner of Beech-Daly and Glendale. The areas to the north of Glendale are residential on both sides of Beech-Daly. The closest residential properties are located about 100 yards to the north of the location of the building that was situated on the General Oil property.

Facility Operations

General Oil Company operated a used oil and oily wastewater treatment and recycling facility at this location for many years The General Oil facility consisted of the building structure, which contained offices, an on-site laboratory, and various material processing and storage tanks and pits, processing and storage tanks that were

located on the north and east side of the building, a tanker truck loading/offloading area, and adjacent open lots for tanker truck and employee parking.

On June 7, 2011, Aevitas Specialty Services, Inc. (Aevitas), a Canadian company that specializes in industrial waste management, purchased the operations of General Oil Company. The purchase included the operations of the General Oil facility on Beech-Daly that is the subject of this report, as well as the operations at an oil product blending facility located at 35796 Veronica Street in Livonia that had been operated by General Oil. Aevitas also purchased a property and building at 663 Lycaste Street in Detroit (SRN N7359), which had previously operated as Energis Detroit, LLC, a used oil processor. Aevitas continued to operate the Redford Township facility until they completed the installation of the used oil/oily wastewater treatment operations at the Lycaste facility. On September 10, 2012, Aevitas ceased operations at the Redford location, and all of the used oil and oily wastewater treatment and recycling business from the Redford facility, including the storage and treatment tanks, were permanently removed from the site. Only the building structure was left standing. The product blending operations from the Livonia facility on Veronica St. were also moved to the Lycaste facility, and Aevitas ceased operations.

In the time since Aevitas ceased operations at the General Oil facility in Redford, the facility property went into foreclosure and tax-reverted to the Wayne County Treasurer in 2016. Copies of a Notice of Judgment of Foreclosure and a Certificate of Forfeiture of Real Property that were entered by the Wayne County Treasurer are attached to this report for reference.

Inspection Narrative

On July 25, 2019, I saw a feature on the EGLE Twitter page about the removal of contaminated soil from the General Oil facility. I drove to the facility on July 29, and I took some pictures which are attached to this report for reference. The building structure had been demolished and removed, and the lot looked to have been graded with the addition of fill material. There were still a couple of pieces of heavy machinery on site that were presumably being used on the project.

I looked through the Asbestos Program files in the AQD-Detroit office, and I found the Notification of Intent to Renovate/Demolish form for the building, a copy of which is attached to this report. According to the form, asbestos containing material (ACM) was to be removed between May 28-31, 2019.

I also came across a document that was put forth by the Charter Township of Redford in June 2018 that addressed a special presentation regarding what was referred to as "General Oil Project (Abatement & Demolition)". This document includes a Community Relations Plan for the General Oil Site, and a Draft Analysis of Brownfield Alternatives for the General Oil Site. These documents describe that the General Oil facility property was transferred to the Michigan Land Bank Fast Track Authority on September 28, 2017; the condition on the property at the of the writing of the documents; the environmental clean-up options that were considered for the property; and the clean-up option that was chosen. A copy of these documents is attached to this report for reference.

I contacted Brandon Alger, a Geologist with EGLE's Remediation and Redevelopment Division's Southeast Michigan Office, to inquire about the project at the General Oil facility site. Brandon sent me an electronic version of a document that contained the Project Work Plan, the Asbestos Abatement Proposed Work Plan, and the Work Plan Figures for the project referred to as "Former General Oil Site." A copy of this information is attached to this report for reference. This information lists the owner of the site as "Michigan DTMB/Dept. of Environment, Great Lakes & Energy".

According to the "Scope of Work" section of the Project Work Plan report, the existing building was demolished, and asphalt and concrete within the excavation area was removed and disposed of. In addition, approximately 16,000 tons of petroleum impacted soil was removed from the site, a remaining underground storage tank was removed, and 16,000 tons of clean Class II sand backfill material and an estimated 500 tons of crushed aggregate were placed and compacted on the site. Brandon provided that, based on his records, the soil removal and backfilling took place between June 10 and August 1, 2019.

I sent an e-mail message to Greg Reichard of Aevitas, who also worked for General Oil, inquiring about the former General Oil site. Greg wrote back that Aevitas never owned the Redford location, but that the company did remove all of the tanks and equipment from the former facility "...and completely moved out of that location in early July 2013." He also wrote that Aevitas ended their operations at the Veronica Street location in spring of

2015, and "...completely moved out of the building and property back in June of 2015." A copy of the e-mail exchange with Greg is attached to this report.

Based on the information gathered in relation to the project at the facility location, the property is no longer owned by any entity associated with either the former General Oil Company, or Aevitas Specialty Services. The General Oil facility is no longer in existence, and all physical structures associated with the facility have been permanently removed from the site location. On a separate note, the building that housed General Oil's blending operations on Veronica Street is now occupied by Motion Control Corporation.

Permits/Regulations/Orders/Other

A review of the facility file and EGLE-AQD's Permit Cards database shows that there were some permits issued to General Oil by the former Wayne County Air Quality Management Division. Permit files were found for Wayne County Permits C-10639, C-8827-8831, C-6767, and C-5543-5548. In addition, Permit C-5363 is listed as an active permit for the facility in Permit Cards. These permits can be voided.

Compliance Determination

Based upon the results of the July 29, 2019 site visit and subsequent information, the General Oil Company facility of Beech-Daly Road in Redford Township has changed ownership. The remaining building structure on the site has been demolished, and the property is now open land. The facility file for the General Oil facility in Redford Township can be voided.

<u>Attachments to this report:</u> pictures of the former General Oil property in Redford Twp. and the building in Livonia that was used by General Oil for oil blending; copies of a Notice of Judgment of Foreclosure and a Certificate of Forfeiture of Real Property that were issued for the property; a copy of a document from Redford Township that includes a Community Relations Plan for the General Oil Site and a Draft Analysis of Brownfield Alternatives for the General Oil Site; a copy of the Michigan EGLE Twitter post from July 24, 2019 that mentions the project at the General Oil site; a copy of the Notification of Intent to Renovate/Demolish form for the building on the site; a copy of the Project Work Plan, the Asbestos Abatement Proposed Work Plan, and the Work Plan Figures for the project referred to as "Former General Oil Site."; a copy of an e-mail exchange with Greg Reichard of Aevitas.

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