

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

N589729561

FACILITY: MDNR GAYLORD REPAIR FACILITY		SRN / ID: N5897
LOCATION: 540 S OTSEGO AVE, GAYLORD		DISTRICT: Gaylord
CITY: GAYLORD		COUNTY: OTSEGO
CONTACT:		ACTIVITY DATE: 05/28/2015
STAFF: Bill Rogers	COMPLIANCE STATUS: Compliance	SOURCE CLASS:
SUBJECT: Scheduled inspection. Equipment removed.		
RESOLVED COMPLAINTS:		

On May 28, 2015, I inspected the site of a groundwater remediation system which was installed in 1996. The remediation was for contamination from a leaking fuel oil tank located at the DNR Gaylord Repair Facility, which was located at 540 South Otsego Avenue in Gaylord.

Our files contain a bit more than one calendar quarter of monitoring data for this remediation system. Estimated air emissions based on the difference between influent and effluent water calculate out to less than two pounds of VOCs per year. There is no monitoring data after the first full quarter is complete. There is no record that the equipment was removed, or if it was removed, when. However, with such low emissions there was little reason for this equipment to have an air permit.

The DNR Gaylord Repair Facility is gone. The building on site now is the 911 police dispatch center.

I announced myself at the door and spoke to "Jean," a worker there. Jean said there is some groundwater testing around the site but the workers in the center don't have much contact with the testers.

There is an area with many wells just north of the center's parking lot (which is behind, that is, west, of the building). Most of the apparent wells are round pipes sticking up about three feet above ground level. These have hinged, padlocked caps. Two or three of these are similar except that they are square metal posts. There are 11 of these in total, of the two types.

There are also four wells set in small concrete pads and capped with metal lids like miniature manhole covers. One of these is unmarked. Two have "Well, do not fill" cast into the metal and the last has "monitoring well" cast into the metal. The area has two holes, crudely covered with pallets, one of which is held down by a concrete block. A plastic pipe emerging from the ground is "capped" by a field stone set on top.

Denise Gruben of the DNR is their contact person for this site. She referred my questions about it to Adam Patton. On July 17, 2015, Mr. Patton sent me an email containing the following information:

Bill.

The old remediation equipment is present within the shed at the old GRS site. It was left in-place as a contingency in the event that it was ever needed in the future; however, I can't recall it being run for well over a decade. There have been no emissions during that time (system not even powered up as the main breaker is locked in the disconnect position).

The primary equipment that would have resulted in any emission at the site was an evaporator/blower associated with a groundwater injection gallery. However, the site has been historically impacted with a #7 fuel oil (like bunker oil), with little to no VOC content in groundwater.

Based on current site conditions, I no longer see any reason for the equipment to be run now or in the future.

J. Adam Patton, CHMM | Manager - Site Investigation Services

Although a strict interpretation of the permit would require emission reports even if the equipment is not operating, I do not intend to ask for these because it would serve no purpose. I have asked Ms. Gruben

to send us reports if the equipment ever operates. In the interim, in my judgment it is best to leave the permit in place in case the DNR wishes to operate this equipment again.

It is likely, with a heavy fuel oil, that this remediation would be exempt from permitting under our rules as they exist today. However, without emissions information I am not sure.

NAME William J Rogers Jr.

DATE 7/20/2015 SUPERVISOR _____

