

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

N755139940

FACILITY: CONOCO PHILLIPS CO - REMEDIATION SITE		SRN / ID: N7551
LOCATION: 3235 WEST WALTON BLVD, WATERFORD		DISTRICT: Southeast Michigan
CITY: WATERFORD		COUNTY: OAKLAND
CONTACT: Laura Sleeper, Project Manager		ACTIVITY DATE: 05/12/2017
STAFF: Rem Pinga	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: Level 2 Scheduled Inspection		
RESOLVED COMPLAINTS:		

On 05/12/2017, I conducted a level 2 target inspection at Conoco Phillips Co., located at 3235 West Walton Boulevard, Waterford, Michigan 48329. The purpose of the inspection was to determine the facility's compliance with the requirements of the Federal Clean Air Act; Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451), the Administrative Rules, and the facility's General Permit to Install (PTI) No. 298-05.

I was at the site on April 21, 2017 for inspection and found out that the facility was a Marathon Gas Station. I observed a stack from a small fenced building towards the east and back side corner of the facility property but the gate was padlocked and the cashier at the gas station had no idea about the remediation equipment. I noticed an "ATC" sign board on the fence with a telephone number. After getting nowhere with the gas station cashier, I decided to leave the property.

At the office, I called the ATC telephone number and eventually got referred to Ms. Laura Sleeper. I found out that ATC Group Services is now the current subcontractor of Conoco Phillips Co. to conduct remediation work at the facility site. I discussed with Ms. Sleeper regarding the facility's AQD PTI No. 298-05 for soil remediation and this year's facility inspection requirement to determine compliance with PTI No. 298-05, State and Federal air quality regulations.

On 5/12/2017, I met with ATC's Ms. Sleeper, David Reinhold, and Jogesh Panda at the site to conduct onsite inspection and discuss compliance with the above permit. During the pre-inspection meeting, I initially showed my credential (ID Badge) to Ms. Sleeper, and all three ATC employees accompanied me to the fenced building housing the remediation equipment.

PTI No. 298-05 was issued to regulate the contaminated soil remediation activity at the site. The facility's system consists of soil-vapor extraction system, oil-water separator, air stripper, activated carbon control for the groundwater/liquid component, and oxidizer control system for the stripped air component coming from the air stripper. Per Ms. Sleeper, ATC took over in 2011 the contract to continue with the remediation activities at the site from Conestoga-Rovers & Associates. However, ATC never operated the oxidizer and I was informed that it was taken off line in July 2009. I obtained an emailed copy of a communication from AQD Permit Engineer, Nicholas Zabrodsky, allowing the facility to discontinue the use of the oxidizer in July 2009 due to sample results showing very low concentration levels of VOC emission rates. Ms. Sleeper also mentioned to me that ATC is only pulling groundwater from certain wells in the site and remediating the groundwater by first going through the oil-water separator. The floating oil is skimmed and hauled off site. The sludge is also hauled off site. The remaining

ground water goes through the stripper (the stripped air is exhausted to atmosphere), then to the carbon control system prior to discharge into the sewer.

Per PTI No. 298-05 special condition FG-REMEDICATION(1.4), ATC continues to monitor water flow rates and collects influent and effluent samples for testing BTEX concentrations. Per PTI No. 298-05 special condition FG-REMEDICATION(1.7), ATC submitted records showing monthly and annual calculations based on monthly 12-month rolling totals of BTEX emissions from the collected sample test results. Per PTI No. 298-05 special condition FG-REMEDICATION(1.1c & 1.3), the submitted records showed the highest monthly 12-month rolling totals for BTEX emission for CY 2016 through April 2017, was 0.0226 lb. in April 5, 2017, and less than the 1 ton permit limit.

Overall, I did not find any noncompliance issues during inspection.

NAME

P. M. / 31

DATE

5/24/2017

SUPERVISOR

Joyce B