

P0313

MANILA

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

P031355379

FACILITY: EXXON MOBIL OIL CORPORATION		SRN / ID: P0313
LOCATION: 11250 HAGGERTY ROAD, BELLEVILLE		DISTRICT: Detroit
CITY: BELLEVILLE		COUNTY: WAYNE
CONTACT:		ACTIVITY DATE: 09/23/2020
STAFF: C. Nazaret Sandoval	COMPLIANCE STATUS: Compliance	SOURCE CLASS: Minor
SUBJECT: FY 2020 Scheduled Inspection		
RESOLVED COMPLAINTS:		

SRN: P0313
SOURCE: Exxon Mobil Oil Corporation
FACILITY ADDRESS: 11250 Haggerty Road, Belleville, MI 48111
INSPECTION DATE: 9/23/2020
INSPECTOR: Nazaret Sandoval – EGLE, Air Quality Division

BACKGROUND

According to AQD records a general permit to install (PTI) was issued to this source in 2012. PTI 13-12 issued on 2/2/2012 approved the installation of a groundwater/soil remediation process to address a release from a Leaking Underground Storage Tank (LUST) System. This type of general permit is issued by AQD (with certain restrictions) to 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. The PTI would have included the following emission units grouped under FG-REMEDICATION: air strippers, soil vapor extraction systems, and air sparging systems; with associated equipment and pollution control devices. However, the permit was voided on 12/19/2012 per applicant request. Apparently, the permit was no longer needed because the proposed treatment system was not going to be installed and the selected treatment alternative would not include the emissions of contaminants to the open air.

This site was inspected on 4/4/2013 to determine the facility's compliance status and to decide whether SRN P0313 should be deactivated from the AQD database. During that inspection I verified that a Mobil Gas Station was still operating at 11250 Haggerty Road, Belleville, MI. I checked the area and I did not notice any evidence of a remediation system or any other activity in the parking lot around the building or near the location of the underground storage tanks. The AQD record was kept active and compliance status was not completed at that time due to insufficient information related to the LUST fate and/or the remediation technology outcome.

The source was reassigned for inspection on FY 2020 to resolve the compliance status.

INSPECTION NARRATIVE

On 9/23/2020 I arrived at the site at about 4:50 PM and inspected the area. The Mobil Gas Station is located at the NW corner of Haggerty Rd. and N. Interstate 94 Service Drive (refer to the attached copy of the aerial photography from Google Earth).

I walked around the building and parking lot. The Mobil Mart building was closed, and the pump station was not operating, all pump handles were covered with plastic bags. I observed various construction cones on the back area of the parking lot at the southwest corner of the parcel. The area surrounded with the construction cones was an excavation near the rectangular concrete pad that contains the UST manholes. The opening was of a certain depth and had standing water with tall grass surrounding what appeared to be a monitoring well. I did not observe any equipment installed at the site with air emission releases to the

atmosphere. I took some pictures from various angles within the parcel. The pictures are part of this report.

COMPLIANCE EVALUATION

As part of this inspection I consulted the EGLE-Remediation and Redevelopment Division (RRD) website, specifically the LUST program and the LUST database. As a result of my investigation I found out that the inspected facility is qualified as an OPEN LUST site (per RRD classification). In other words, a release has occurred from an underground storage tank system and the corrective actions have not been completed to meet the appropriate land use criteria.

When I searched the RRD LUST database using the address for the site, the results showed a facility identified under the name "Belleville Oil Inc.", Facility ID: 00016590.

A print-out from the query is attached to this report and it shows that the site originally had nine fuel storage tanks. Tanks No.1 to No. 5 were installed in 1972 and tanks No.6 to No.9 were installed in 1988. According to the last tank information, updated in 2016, tanks No.1 to No. 5 were removed and the rest of the tanks were still in use.

I also consulted the webpage for the Bureau of Fire Services, Department of Licensing and Regulatory Affairs (LARA) to obtain additional information on the UST status since the UST program was transferred to that entity effective 12/2/2012. However, I did not find anything different from what RRD had, except that I found the specific dates when tanks No.1 to No. 5 were removed from the site. Tank No.1 was removed on 9/30/1990 and the four remaining tanks were removed on 9/28/1990.

During the investigation I also reached out to Joan Parks (RRD- LUST program) to find out details about the status of the remediation project. She confirmed that there was soil and groundwater contamination at that facility and the UST site is still an OPEN LUST. She indicated that the last report was submitted on 6/19/2014. However, she did not clarify the type of corrective action implemented by the facility in terms of remediation systems, but she forwarded my concerns to Beth Vens, RRD Supervisor. With respect to the type of well currently installed at the site, Ms. Vens confirmed in an email dated 9/30/2020 that the well is part of the UST monitoring system. The link to a UST equipment manufacturer provided by Mr. Steven Hoin, RRD, showed a picture that matched the well cover I observed at the site. It was an orange/gray well cap identified as a "Vapor Adapter Cap" featuring a lockable cap and a cam system designed for Stage I vapor recovery dual point systems.

CONCLUSION

At the time of the inspection, the site did not have a remediation system installed with emission to the atmosphere which would require an AQD permit. I did not observe any air strippers, soil vapor extraction systems, or air sparging systems, with associated equipment and pollution control devices. Therefore, the facility appears to be in compliance with applicable State and federal air pollution laws and regulations, as there does not appear to be equipment on-site at present releasing emissions to the ambient air. However, based on the site inspection and visual observations, in conjunction the LUST systems database search results and the information provided by RRD staff, the presence of an UST monitoring well in an active site with an OPEN LUST was confirmed. Hence, AQD will keep this source as an active facility under record number SRN P0313 because there might a need for a remediation system regulated under the AQD general permit in the future.

NAME H. Anderson

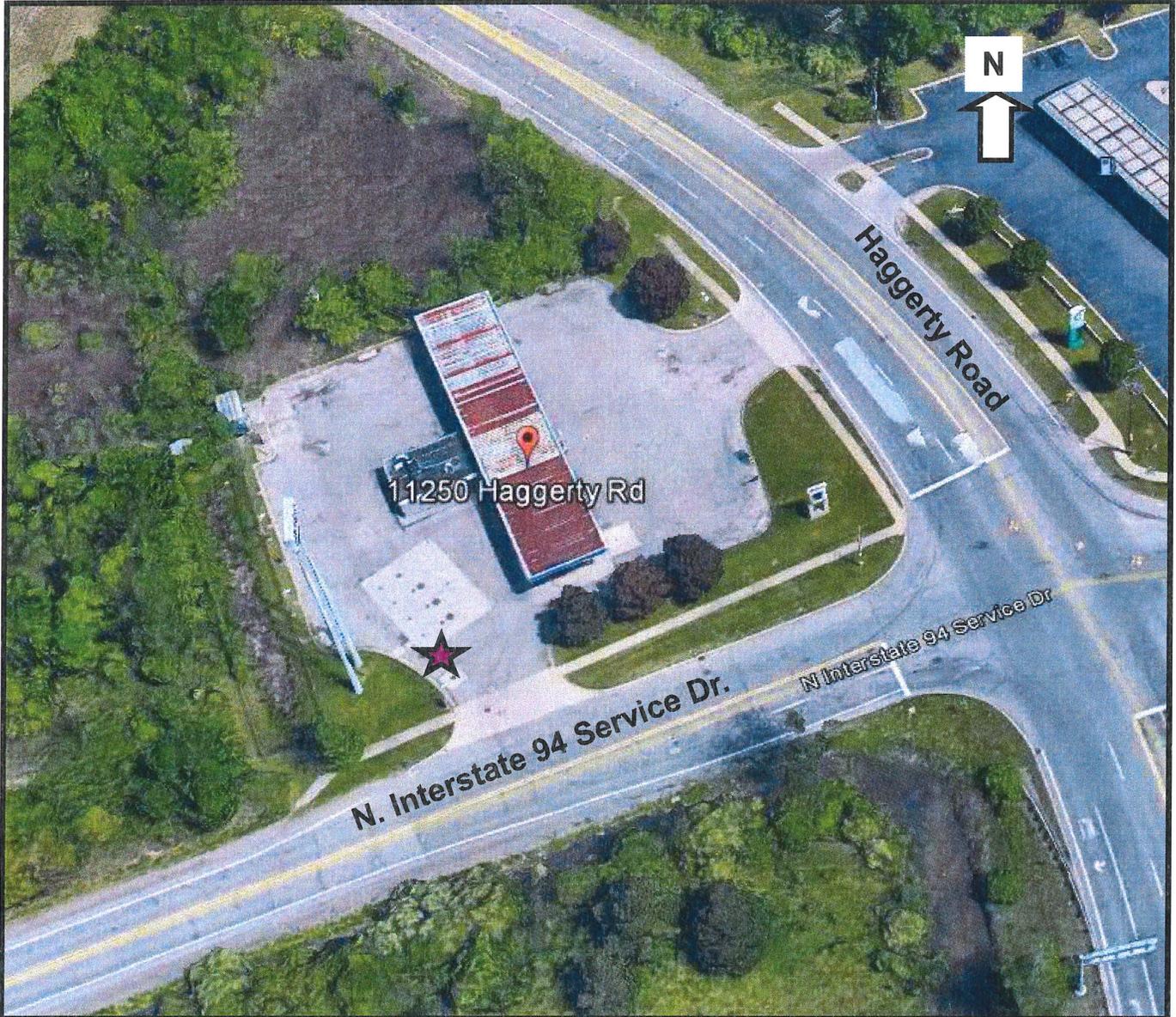
DATE 10/28/2020 SUPERVISOR JIK

SRN P0313

EXXON MOBIL OIL CORPORATION

11250 Haggerty Rd., Belleville, MI 48111

Inspection Date: 9/23/2020



Facility Location

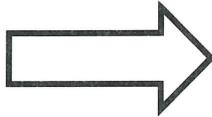
Aerial Photography from Google

The star marks the location of the excavation

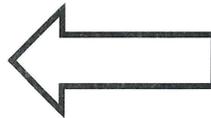
SRN P0313

EXXON MOBIL OIL CORPORATION
11250 Haggerty Rd., Belleville, MI 48111
Inspection Date: 9/23/2020

Mobil Mart Building was closed



**All pumps handles were covered.
Pump station was not operating**



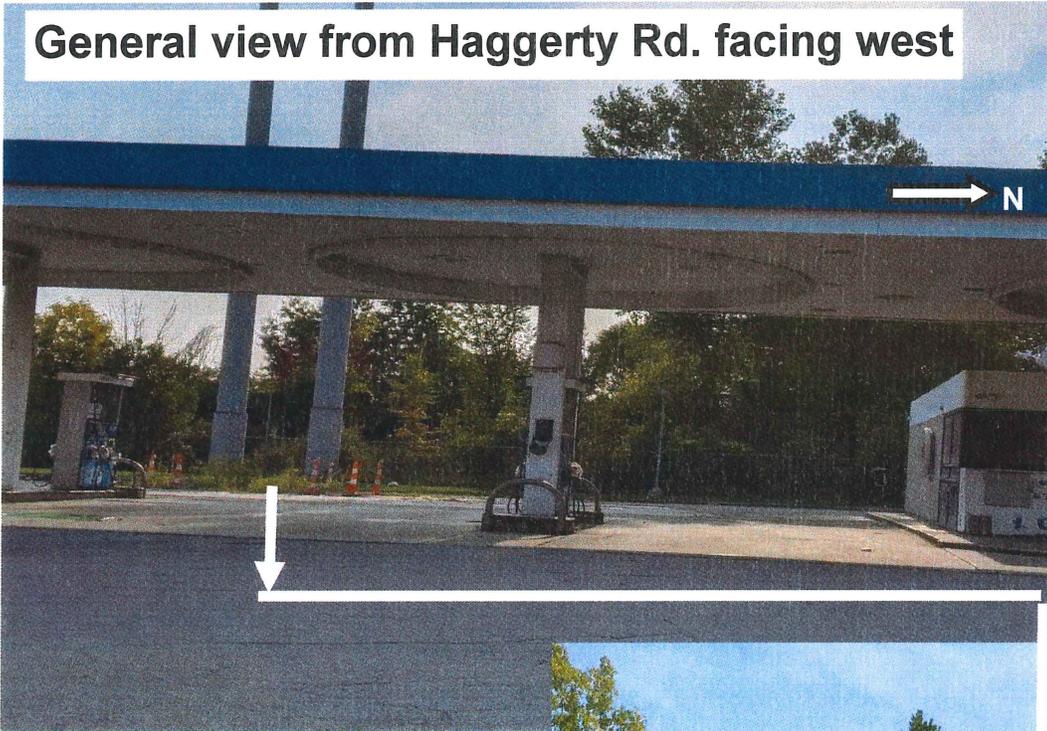
SRN P0313

EXXON MOBIL OIL CORPORATION

11250 Haggerty Rd., Belleville, MI 48111

Inspection Date: 9/23/2020

General view from Haggerty Rd. facing west



**Excavation Detail - Groundwater Monitoring Well Location
SW corner near the "rectangular patch" with manholes covers**

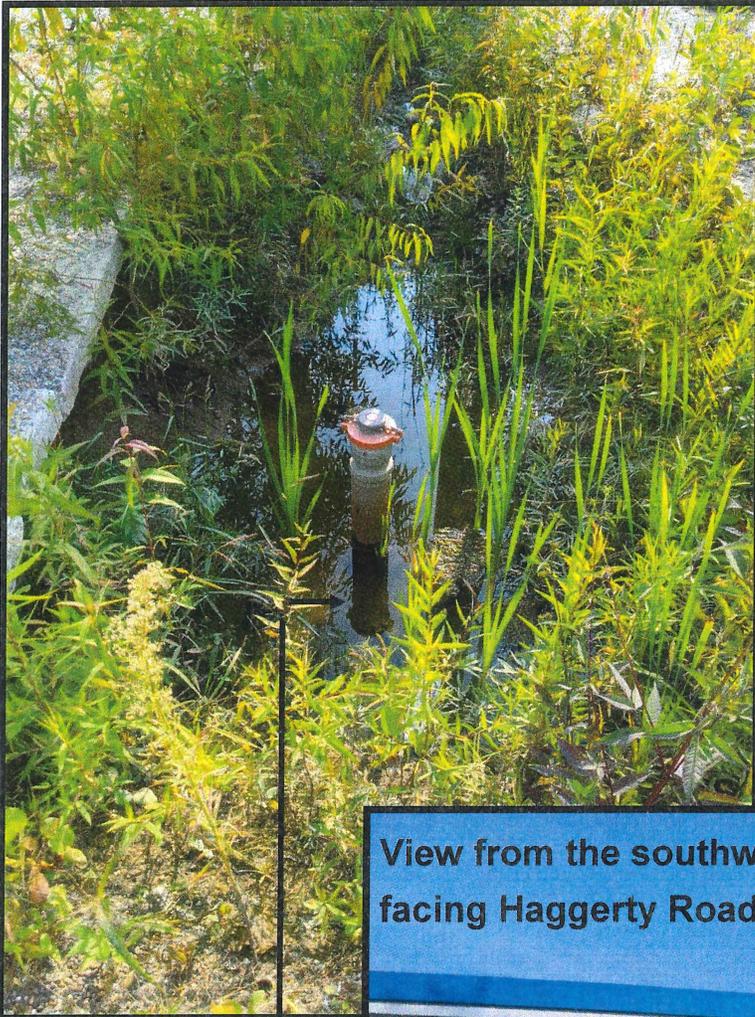


SRN P0313

EXXON MOBIL OIL CORPORATION

11250 Haggerty Rd., Belleville, MI 48111

Inspection Date: 9/23/2020



Monitoring Well

View from the southwest corner of the parking lot facing Haggerty Road

