

Manilla

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

P037223600

FACILITY: Speedway LLC - Mattawan		SRN / ID: P0372
LOCATION: 24118 COLE AVENUE, MATTAWAN		DISTRICT: Kalamazoo
CITY: MATTAWAN		COUNTY: VAN BUREN
CONTACT: Roy Hoin , Consultant		ACTIVITY DATE: 10/30/2013
STAFF: Dorothy Bohn	COMPLIANCE STATUS: Compliance	SOURCE CLASS: B
SUBJECT: targeted inspection of a remediation under a general PTI.		
RESOLVED COMPLAINTS:		

I went to the facility on October 30, arriving at about 9:25 and leaving about 9:35. There was no one at the trailer. I took 2 pictures (attached). The next day I called the ATC number that was on the trailer and was told that Roy Hoin was the contact to get the records for the facility. I called Roy and spoke with him and then on the 31<sup>st</sup> emailed him a list of questions and request for records. On 11/5/13, Roy emailed a response to my email (attached). The system is a vacuum enhanced groundwater extraction (VEGE) remediation system combining groundwater and soil vapor (SV) extractions. It began operation on 7/15/11.

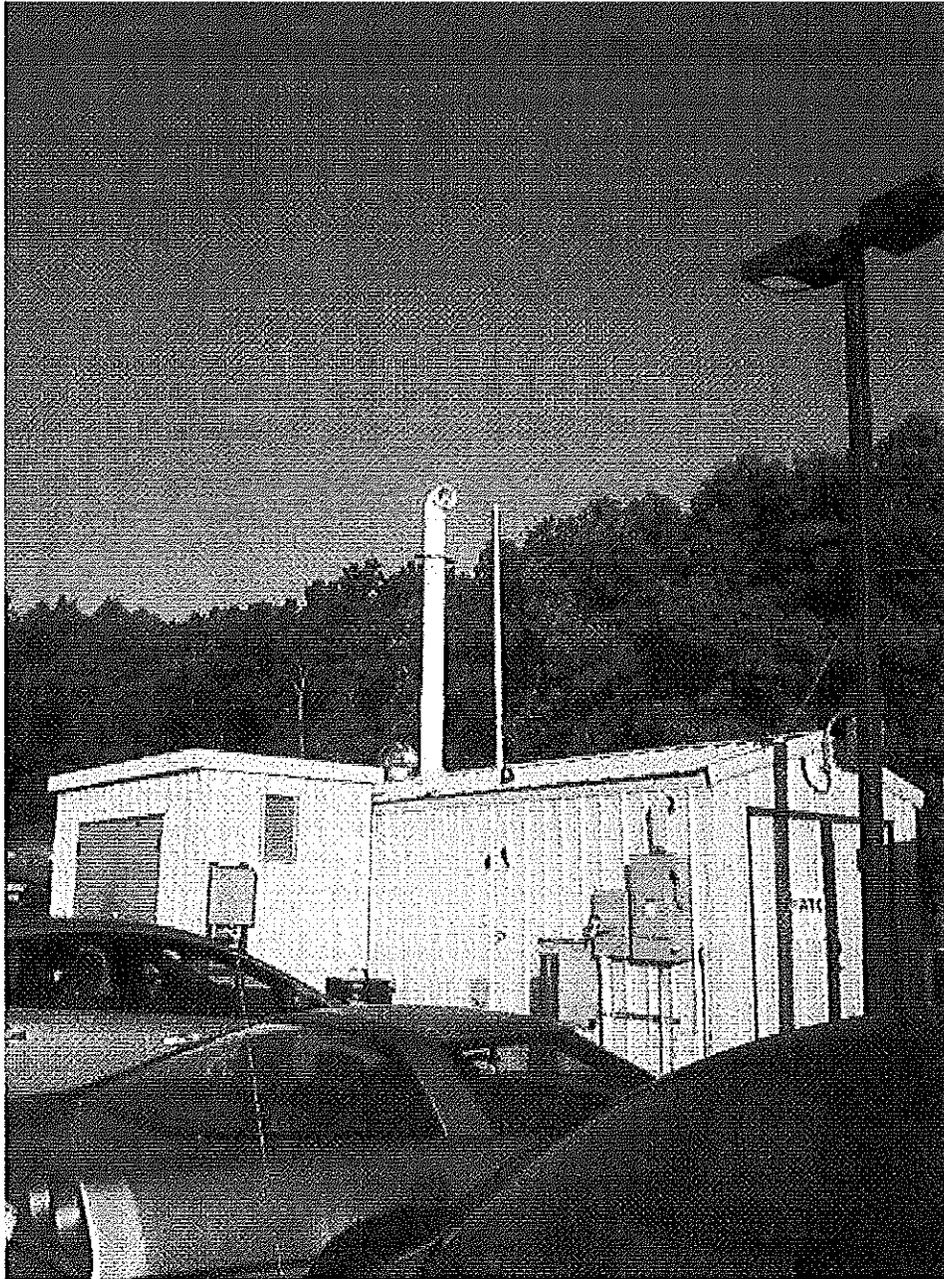
The groundwater extraction (GE) can be operated independently of the SVE. The GE separates any liquid petroleum product from the groundwater using 2 airstrippers (in parallel) and is considered pretreatment. The airstrippers exhaust through the PVC pipe that has a horizontal release. The water then goes through activated carbon control and is injected back into the ground.

Roy says that the airstrippers operated from 7/15/11 until 10/15/12 (prior to the startup of the SVE) under Rule 290 and after 10/15/12 the system was then operating under the PTI. The air strippers were removed as of 2/4/13 to improve system performance. Rule 290 records are attached. They show the 1<sup>st</sup> month (July '11) had the highest emissions at 15.65 # TPH. (I calculate 17#.) Both are less than 20#.

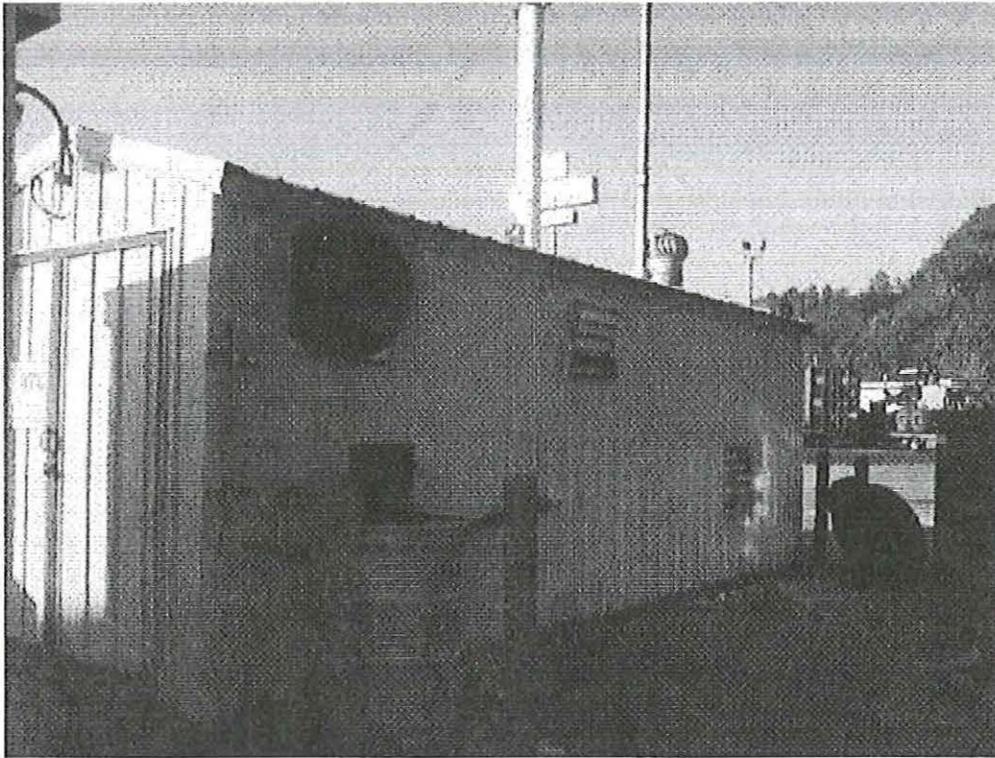
Once the SVE began operation then the whole system falls under the PTI. The SVE has a knock out tank for any liquid that might be in the vapor stream and then the air is released uncontrolled through the metal stack. So the PTI has been in effect since 10/15/12. The system has not operated since 3/15/13 due to a mechanical problem. The records show compliance with the 12 month rolling totals for BTEX and TPH.

There is a 55 gal drum on the north side of the trailer and Roy said this is connected to an oil-water separator to collect any potential liquid petroleum product in the groundwater. To-date they have not observed any.

It looks like for the period of time that the air stripper operated under the PTI it was in violation of the stack requirements since it did not discharge unobstructed vertically upwards. Since this part of the process is not being used anymore I will send an email to Roy that if they should restart it they need to correct this.



**Image 1(NW View)** : Picture of the trailer looking towards the NW. The PVC pipe (on left) is for the air strippers. The metal stack (on the right) is for the SVE system. Taken on 10/30 by DB.



**Image 2(North side) :** View is looking at the north side of the trailer. 55 gal drum is for petroleum product collected in the oil/water separator.

NAME Rosothy Bohm

DATE 11/8/13

SUPERVISOR MA 11/8/2013

