

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

P038148786

FACILITY: PREMCOR REFINING GROUP, INC		SRN / ID: P0381
LOCATION: 3280 SOUTH WAVERLY ROAD, LANSING		DISTRICT: Lansing
CITY: LANSING		COUNTY: EATON
CONTACT: Christian Seidel , Project Geologic Specialist		ACTIVITY DATE: 04/30/2019
STAFF: Michelle Luplow	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: Announced, scheduled inspection of the former Clark gas station remediation site to determine compliance with General PTI 143-12.		
RESOLVED COMPLAINTS:		

Inspected by: Michelle Luplow (author); Samantha Braman (AQD Lansing District); Marina Ostaszewski (AQD Permit Section)

Remediation Project onsite contact: Christian Seidel, Project Geologic Specialist (Christian.seidel@arcadis.com)
Additional project contacts: Bruce Rust (bruce.rust@arcadis.com)
John Tenison (john.tenison@valero.com)

Purpose:

Conducted an announced, scheduled compliance inspection of the Premcor Refining remediation site (Premcor) to determine compliance with General PTI 143-12 for a soil vapor vacuum extraction system. This site was last inspected July 2014.

Facility Background/Regulatory Discussion

Premcor obtained General PTI 143-12 for soil remediation of gasoline and BTEX from leaking tanks and lines at the former Clark gas station located at this address. The Clark station is gone and replaced with a small strip mall. Arcadis obtained this site from Premcor approximately 2 years ago. Based on the 2012 General PTI application, the remediation work was planned to take 5 years to complete. According to Christian Seidel, the system was shut off in August 2016 and 2018 soil testing (results of which were sent to the Remediation and Redevelopment Division [RRD] in the Lansing District Office) confirms that the remediation is no longer necessary. C. Seidel said they are in the process of creating a closure report that will be submitted to RRD sometime in December 2019.

Abby Leinbach, RRD Project Manager for the site, said that RRD will determine if the site has been remediated and can be closed based on the closure report.

Inspection:

Christian Seidel and I arranged to meet at the facility at 10 a.m. on 4/30/19 to get access to the remediation trailer, which is located behind the strip mall. Samantha Braman, Marina Ostaszewski and I arrived at 3280 S. Waverly at approximately 10:00 a.m and met with C. Seidel. I provided C. Seidel with a copy of the General PTI in addition to a January 2017 PTI exemption handbook.

The equipment/testing trailer is still present onsite. There is an ~2-inch PVC pipe which is utilized as a stack, that is 1.5 times the height of the trailer to exhaust vapor emissions from the soil vapor extraction system to ambient air. There is no control device associated with this equipment. The PVC piping used to route treated water to the storm sewer has been removed, as well as the connections from the trailer to the remediation wells located in the parking lot.

We were not able to observe the equipment inside the trailer as it was locked and C. Seidel did not have a key. Attached are photos taken by C. Seidel showing the equipment within the trailer. He said that the equipment is still capable of running for remediation purposes.

C. Seidel provided me with 2014 – 2016 emissions data. See Table 1. VOC and BTEX emissions are each limited to 10 tpy on a 12-month rolling basis. Although Table 1 presents the data by calendar year, the emissions are so low (~10% of limit) that any 12-month rolling period throughout these 3 years would show compliance with the limits.

Table 1. 2014-2016 VOC and BTEX emissions data

	2014	2015	2016
VOC	1.6 tpy	0.4 tpy	0.1 tpy
BTEX	0.02	0.01	0.00

Although remediation has not been conducted since 2016, the General PTI will remain active until the AQD has been notified that the trailer has been removed from the site. Once the closure report is received and reviewed by RRD staff, further determinations will be made regarding the status of remediation completion.

Compliance Statement: Arcadis is currently in compliance with PTI 143-12 at this time.



Image 1 (Test Trailer Stack) : Test Trailer with PVC Stack attached.

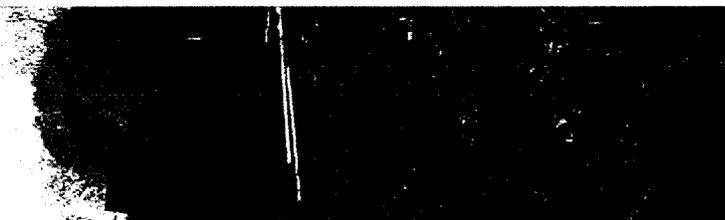


Image 2(f)



(groundwater)

NAME

[Handwritten Signature]

DATE

5/8/19

SUPERVISOR

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