DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: On-site Inspection

B562767904

FACILITY: Nexeo Solutions, LLC (DBA Univar Solutions USA)		**SRN / ID:** B5627
LOCATION: 2011 TURNER ST, LANSING		**DISTRICT:** Lansing
CITY: LANSING		**COUNTY:** INGHAM
CONTACT: Mike Bommarito , Plant Manager		**ACTIVITY DATE:** 06/15/2023
STAFF: David Rauch	**COMPLIANCE STATUS:** Compliance	**SOURCE CLASS:** SM OPT OUT
SUBJECT: An unannounced routine inspection of the facility was conducted to ensure compliance with PTIs 611-82A and 95-15.		
RESOLVED COMPLAINTS:		

On June 15, 2023 the State of Michigan's (SOM), Environment Great Lakes and Energy (EGLE), Air Quality Division (AQD), conducted a routine inspection of Univar Solutions. The facility location is at 2011 Turner St. Lansing, MI.

The Environmental Contact:

Michael Bommarito, Senior Facility Manager, Michael.bommarito@univarsolutions.com.

517-372 -4166

Facility Description:

This facility is used for distribution of chemicals for various uses such as thinners and solvents. The facility holds these chemicals in 31 total tanks. From the tanks the chemicals are distributed in volumes between 5-, 55-, 330, and 550-gallon containers. The facility runs 2 shifts and currently employees 17 workers. The two shifts run from 7:00am-3:30pm and 1-9pm. The first shift completes filling drums, bulk filling, mixing, and bulk receiving, while the second shift does some filling and monitors the site. The facility runs Monday through Friday.

Location:

This facility is located at 2011 Turner St and is at the intersection of Turner St and Douglas Ave. Upon arrival entry is only granted at the North Gate for visitors and you must call 517-372-4166 to open the gates. The facility location is in a very residential area, to the East, North and South there are homes. To the West it is an industrial park. The facility is located just west of Old US 27.

Regulatory Overview:

This facility is classified as a synthetic minor source for HAPs and VOCs and has an opt-out permit 95-15. This facility reports to MAERS as a Category E facility.

MAERS Reporting for 2022:

Emissions Units:

EU-101 through EU-126, EU-201 through EU-204, EU-302 [31 Tanks], Eu-Boiler, EU-EMENG, EU-Filling, EU-Fugitive, EU-Loading

Emission Units:

Storage Tank	Capacity	Type Tank	Product

	(gallons)	FIX – fixed roof tank IFR – internal floating roof	(Tank contents)
101	5000	FIX	Glycol Ether DB
102	5000	FIX	Hexane
103	9700	FIX	N-Butyl-Acetate
104	9700	FIX	N-Propyl-Acetate
105	11500	FIX	Methyl Isobutyl Ketone
106	11500	FIX	Ethyl Acetate 99%
107	5000	FIX	Ethyl Acetate 99%
108	12000	FIX	Methyl Acetate
109	12000	FIX	Methyl Ethyl Ketone
110	12000	FIX	Methyl Amyl Ketone
111	12000	FIX	Mineral Spirits 66 1%
112	15000	FIX	Isopropanol 99%
113	15000	FIX	Aromatic 150 ND
114	15000	FIX	Propanol

115	15000	FIX	Odorless Mineral Spirits
116	15000	FIX	Glycol Ether DB
117	15000	FIX	Heptane
118	15000	FIX	Acetone
119	15000	FIX	Acetone
120	20000	FIX	Methanol
121	20000	FIX	Xylene
122	20000	FIX	Toluene
123	20000	FIX	Methanol
124	20000	FIX	Toluene
125	20000	FIX	Glycol Ether EB
126	20000	FIX	VM&P Naptha
127	20000	FIX	Out of Service- EMPTY
201	1500	FIX	Blend Tank
202	8800	FIX	Blend Tank
203	8800	FIX	Heptane
204	6400	FIX	Solvent 142-66
302	12200	FIX	Kwik Dri 66

EU-EMGEN, EU-BOILER, EU-FUGITIVE, EU-LOADING, EU-FILLING were all observed during the facility, and all were in compliance with the PTI 95-15 and applicable exemptions for EU-BOILER and EU-EMGEN.

Facility History:

This facility was previously Ashland Chemical then Nexeo Solutions and is now Univar Solutions. This facility has two active PTI's 611-82A and 95-15, both were issued under the previous facility names. One for Ashland Chemical and one under Nexeo Solutions.

Inspection:

Arrived at the facility at 9:00am at the North gate where I called the number 517-372-4166 to gain entry. I was met by Michael Bommarito at the gate where I was directed to park on the side of the office building. Michael and I met in a conference room to discuss the facility and emissions. The facility has added two tanks and now has 31 total tanks although the 2 new tanks are currently not in use. Michael stated the facility uses an internal environmental group to determine emissions and chemical changes to tanks. Facility provided records from 2020 to the current month June 2023.

This facility was currently housing 24 tanks in one large open air storage section that is surrounded by a concrete wall and lower than ground level to ensure any leaks or spills will be caught. The tanks are split into rows with staircases between the rows and the ability to get to each tank was possible. Each tank has its own meter on it indicating the tank level in feet of liquid being held in the unit.

The metal pole warehouse section has fumed dry silica, and empty totes broken up into individual bays waiting for distribution. This section also houses salt and winter equipment for the facility. This warehouse was very clean and well organized. The pole barn is used for non-liquid products.

The primary warehouse has the staging area and warm room, this is where all the chemicals are held in smaller totes and barrels. The staging area has hoses and roller tracks to fill and move drums and totes of chemicals to holding areas until they are ready to be sold. The facility also uses a warm room to ensure the chemical that freeze are maintained in a liquid state and held at proper temperatures. All chemicals in this area are labeled and dated with the dates of when they were filled.

At the back of the facility there is a train yard where one or two tanker train cars can be held and filled. The facility has an overflow plan for any of the train cars that may be overfilled or leak. The facility designed a lagoon for major spills and as a catch all in case there should be a major failure. The emergency plan would be to drain the lagoon of any spilled chemicals and remove all foliage.

All records were reviewed offsite after the inspection, records were sent via email. Records were properly maintained and in compliance.

Facility PTI 611-82A was reviewed and the permit conditions were met as follows:

SC 14, 17, 21 and 25; are no longer applicable due to the facility no longer having the paint booth on site.

SC 15 states there shall be no visible emissions from the paint spray booth, and drum filling operation EU-FILLING. During inspection the drum filling station was not in use, no emissions were observed.

SC 16 references the EU-Boiler and visible emissions from the boiler. The boiler is a natural gas fired boiler with a BTU input rating of 80,000 per hour and a BTU output of 379,599 per hour. There were no visible emissions observed during the inspection.

SC 18 discusses fuel changes, but does not discuss an applicable EU, based on the permit it is assumed to be the Boiler which is only natural gas fired.

SC 19 states the facility shall not hold chemicals that are not approved without written consent from the AQD. This list of chemicals has not been updated since 1992 and there are letters in the folder for PTI 611-82A. Facility does actively report to MAERS and uses AP42 emission factors based on size of tanks, tank type and chemical contents.

SC 20 requires all tanks to have a conservation vent unless storing methylene chloride, perchloroethylene, or trichloroethylene. All three of these chemicals are no longer stored on site in large tanks but may be stored in drums or totes at a max quantity of 550-gallons. The tanks do have the conservation vents as well as a radar monitoring system for monitoring levels in the tanks.

SC 22 requires the exhaust vent from the drum filling station to be 26' tall and 8" in diameter, based on observations the stack meters these criteria.

SC 23 specifies that the facility cannot produce noxious odors and impact the general living environment in the surrounding area near the facility. No odors were detected, and no odor complaints were received prior to the inspection.

SC 24 states tanks with methylene chloride, perchloroethylene, or trichloroethylene shall have carbon absorbers, these chemicals are no longer stored in the tanks. There are no carbon absorbers for these chemicals. SC 26 discusses installation of carbon absorbers, but the chemicals are no longer stored in tanks.

Review of PTI 95-15 which was the review of facility records to ensure they are within their emission limits. Records were pulled for 2020 thru 2023 and the rolling average for each year. Facility record keeping in report shows the rolling average for each year and the rolling average for both HAPs and VOCs.

SC I.1 Each Individual HAP <9.0tpy rolling; facility was in compliance for all years reviewed.

SC I.2 Aggregate HAPs <22.5tpy rolling; facility was in compliance for all years reviewed.

SC I.3 VOC totals <90tpy rolling; facility was in compliance for all years reviewed.

SC II.1 Total VOC Containing Materials <37,151,000 gal/year

Total gal of VOC containing materials Rolling:

June 2022: 9,038,361.01

June 2023: 6,507,631.88

A call was made on July 25, 2023 with Crystal Jones the Regional Regulatory Manager from the office in Illinois to discuss the facilities PTI 611-82A. The facility will be in discussion with AQD and the Permit Section to bring the old permit up to date and add the new chemicals on site.

Fee Status:

This facility is a Category E facility and does not currently pay MAERS fees for emissions.

Facility Record Keeping: Rolling Averages, shows end of 12-month Avg.

Facility Emissions	2020	2020 Tons	2021	2021 Tons	2022	2022 Tons	2023*
Total VOCs (lbs)	9370.39	4.685	11100.83	5.550	11904.76	5.952	10687.81*
Total HAPs(lbs)	1684.54	0.842	3159.19	1.579	2809.26	1.404	2282.24*
Total Acetone (lbs)	2864.84	1.432	2675.73	1.337	3180.65	1.590	2643.57*

***= 12month Avg was taken from most recent month's data.**

Conclusions:

This facility was in compliance with the two active PTIs 611-82A and 95-15. There were no odors or emissions viewed prior to or during the inspection. The facility was clean, and all materials were properly stored during the inspection. All chemicals had sections of spill prevention to keep the chemicals contained incase of a leak or major spill. Facility MAERS were accurate and facility record keeping is properly maintained.

NAME David Rauch DATE 07/14/2023 SUPERVISOR RB