

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

H609225270

FACILITY: UNIVAR USA INC. - ROMULUS BRANCH		SRN / ID: H6092
LOCATION: 13395 HURON RIVER DR, ROMULUS		DISTRICT: Detroit
CITY: ROMULUS		COUNTY: WAYNE
CONTACT: Dave Cody , Plant Manager		ACTIVITY DATE: 05/28/2014
STAFF: Katherine Koster	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: Targeted FY2014 inspection		
RESOLVED COMPLAINTS:		

REASON FOR INSPECTION: Targeted Inspection
 INSPECTED BY: Katie Koster, AQD
 PERSONNEL PRESENT: Dave Cody, Plant Superintendent
 FACILITY PHONE NUMBER: 734-941-8235
 FACILITY FAX NUMBER: 734-941-7140

FACILITY BACKGROUND

UNIVAR Corp (formerly known as Chemcentral) is a chemical blending, repackaging, and distribution facility. The facility does not produce or manufacture chemicals; rather, it receives chemicals from manufacturers for distribution to other companies. Most of the products repackaged and blended are liquids in the form of paints, inks, and adhesives. Some solid chemicals are repackaged, too, although this accounts for only a small percentage of the business. The Corporate Headquarters are located in Seattle. The Romulus facility has existed at this location for the last thirty years and operates from approximately 5 a.m. to 9:30 p.m., Monday through Friday. Chemcentral was purchased by UNIVAR in 2007. Currently employs 33 people.

COMPLAINT/COMPLIANCE HISTORY

The last inspection of this facility was conducted in 2011. Facility was determined to be in compliance at that time.

OUTSTANDING CONSENT ORDERS

Facility is no longer operating under any state Consent Orders.

INSPECTION NARRATIVE

On May 28, 2014, AQD inspector Katie Koster conducted a targeted inspection. I arrived at approximately 9:00 a.m. and I did not detect any odors or observe any fugitive emissions from the facility upon arrival.

At the facility, I met with Mr. Dave Cody, Plant Superintendent. He provided an overview of the operations before we started the inspection. Solvent is generally received by tanker; however there are many "pass through" materials received in drums and totes by truck. Facility also receives methanol via railcar; on average of one per month. Upon delivery, bulk product is analyzed and either pumped into one of 14 aboveground compartmentalized storage tanks ("Tank Farm") or decanted into a portable tank or 55-gallon drum. All 14 storage tanks are horizontal (10' x 46') and each tank is divided into three to five fixed compartments for a total of 68 compartments. Compartment sizes range from 3,000 to 10,000 gallons each. Tanks are equipped with automatic shut off if the fill level exceeds 95% of the tank capacity. Each compartment has its own dedicated line and pump. Blend tanks are also in use for certain products. The remainder of facility is storage.

We viewed three drum filling lines, one tote line, and one canning line in the warehouse. The company fills about 1000 cans per month and 300-400 totes per month. Throughput has increased a little due to the absorption of the Grand Rapids tank farm business once it shut down. Emissions exhaust uncontrolled to a single stack. The drum and tote filling lines are automated and equipped with submerged fill. The canning line is currently manually operated but there are plans to upgrade it to automatic.

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We walked through the "pass through" storage area which is not temperature controlled. Other storage areas are a new "food grade" room, flammables, solvents, and oxidizers.

We walked outside and observed the tank farm which was installed in 1997 to replace the underground storage tanks. The tanks are contained in a concrete pit for spill protection and appeared to be in good condition. We proceeded to the loading rack. Product is pumped from the tanker to the storage tank. Maximum pumping rate for each pump is about 55-60 gal/min. There are 4 bays for unloading but not all bays can be used at the same time according to Mr. Cody. There is also a rail spur for railcar unloading.

The facility recently installed two remediation units which are each operating under Rule 290; a biological wastewater treatment system (WWT) for treating extracted groundwater in above-grade tanks, and a soil vapor extraction (SVE) system to remove volatile organic compounds (VOCs) from unsaturated soil at the site. We viewed both of these units. The WWT equipment is inside the warehouse in the east dock area. It works by utilizing solvent eating bugs. The SVE system is outside. Activated carbon is used for VOC control. We walked past the former site of the Aqua Detox Unit. It has been removed and replaced by the WWT system, which according to Mr. Cody, was approved by Beth Vens, DEQ.

Mr. Cody and I concluded the inspection in a conference room where we discussed recordkeeping and I stated that I would be following up via email with a records request.

APPLICABLE RULES/PERMIT CONDITIONS

Permits 160-97, 57-03, and 27-02 have been voided. Opt Out permit 118-06 was approved on July 11, 2006. The following is a list of the special conditions that were reviewed for compliance (they are paraphrased for brevity):

EU-CONT-FILL – Container filling operations (this includes bulk loading as well)

1.1a **IN COMPLIANCE.** VOC emissions are limited to 10.5 tons per 12 month rolling time period. According to the MAERS report, the container filling emissions were 1.44 tons for the 12 month rolling time period ending December 2013 according to the MAERS report.

1.1b **IN COMPLIANCE.** Each HAP is limited to 8 tons per 12 month rolling time period. According to the MAERS report, the total HAP emissions were approximately 0.35 for the 12 month rolling time period ending December 2013. This indicates compliance with the individual limit.

1.1c **IN COMPLIANCE.** Total HAP's are limited to 10.5 tons per 12 month rolling time period. See above.

1.2 **IN COMPLIANCE.** Throughput of each air contaminant shall not exceed the limit calculated in Appendix A. In no case shall the throughput of any individual contaminant exceed 15,000,000 gallons per 12 month rolling time period. Based on information submitted with the MAERS report, total throughput of all products for container filling and bulk loading in 2013 was 4,719,728 gallons which is below the limit of 15,000,000 gallons for a single TAC except for the following TAC's that have more restrictive limits: 2-propoxy-1-propanol, dimethyl glutarate, dimethyl adipate, dimethyl succinate, methylene chloride, trichloroethylene, triethylamine. Additional information was received on 7/21/14 for the TAC's listed above which shows yearly throughputs below the Appendix A limits. See attachment A.

1.4 **IN COMPLIANCE.** Shall keep in a satisfactory manner records of allowed throughput for each TAC as determined according to Appendix A. As agreed upon with the facility (see manila file) monthly and 12 month rolling throughputs only need to be maintained for methylene chloride, TCE, and triethylamine as these three chemicals have the most restrictive throughput limits based on the algorithm provided in the permit and the facility is maintaining these records. According to information received on 7/21/14, 2013 throughput was zero for methylene chloride, TCE, and triethylamine. See attachment A.

EUTANKFARM – 14 above ground storage tanks

2.1 **PENDING.** VOC emissions from EUTANKFARM shall not exceed 3.45 tons per 12 month rolling time period. The 2013 MAERS report shows emissions of 18.7 tons. AQD requested additional information via email (Attachment B). On 7/21/14, facility send additional information which included the following "a glitch in HCE's computer program as used for the air emission calculations, one that, through HCE's review, was discovered to assign the entire site-wide throughput to each storage tank containing said product (as opposed to, if applicable, proportionally allocating the site-wide throughput of a product to several tanks that store the said product), resulting in an overestimation of overall air emission quantities." A recalculation of emissions was attached with annual emissions of 2.11 tons. See Attachment C. However, the tank throughput in the 4U Annual Report 2013.pdf appears to be higher than the throughput initially reported in MAERS. AQD has requested additional information.

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2.2 IN COMPLIANCE. Product transfer rate into EUTANKFARM shall not exceed 211 gallons per minute. According to facility personnel, product is pumped at a rate of 60 gallons/minute per pump and all four pumps cannot be used at the same time as a matter of operational policy.

2.3 IN COMPLIANCE. Shall comply with all applicable provisions of NSPS Subpart Kb. Tank dimensions, capacity, and product stored record is maintained. See prior inspection records.

2.4 IN COMPLIANCE. Shall not operate any compartment of EUTANKFARM unless pressure/vacuum vent installed and operating properly. Tanks are equipped with shut off valves, conservation vents, and flame arrestors. According to facility, tanks were recently inspected by DEQ.

FGBLENDTANKS – 3 above ground blend tanks

3.1 – IN COMPLIANCE. Shall not use hexsolv in FGBLENDTANKS without prior notification to and approval by the AQD. Plant manager stated no hexsolv has been used.

S.C. 3.3 – IN COMPLIANCE. Shall not produce more than the following amount of each product per year (gallons). Throughput information for 2012 and 2013 is below (also see Attachment A).

Product	Limit	2012 throughput	2013 throughput
DT 885	25095	0	0
H-100	14300	0	0
Parcosol 131R	344232	0	0
Parcosol EC-6	46805	0	0
Parcosol T46537	1603	0	0
Polypurge 6773	89925	0	0
Polypurge OH	124235	46475	40249
T-9273	39600	651	8402

S.C. 3.4 – IN COMPLIANCE. Shall keep records of the amount of product produced. Records for 2013 and 2012 were provided.

FGFACILITY

4.1a PENDING. VOC limit of 20 tons per 12 month rolling time period. The 2013 MAERs report shows emissions of 21 tons. AQD requested additional information via email (Attachment B). On 7/21/14, facility send additional information which included the following "a glitch in HCE's computer program as used for the air emission calculations, one that, through HCE's review, was discovered to assign the entire site-wide throughput to each storage tank containing said product (as opposed to, if applicable, proportionally allocating the site-wide throughput of a product to several tanks that store the said product), resulting in an overestimation of overall air emission quantities." A recalculation of emissions was attached with annual emissions of 4.01 tons. See Attachment C. However, the tank throughput in the 4U Annual Report 2013.pdf appears to be higher than the throughput initially reported in MAERS. AQD has requested additional information.

EXEMPT EQUIPMENT

WWT and SVE unit are operating under R290. Monthly records were submitted with the 2013 MAERS and show compliance with the applicable emission limits (Attachment D).

In MAERS, the SVE has a throughput of zero but there are emission estimates. Monthly records for the soil vapor extraction system were submitted. Records are based on weekly sample results and indicate compliance with R290. Facility provided information that units for throughput are incorrect in MAERS so that is why they are reporting zero. See Attachment A and D.

AREA SOURCE MACTS and NSPS

As facility is not manufacturing any chemicals or coatings, it does not appear to be subject to area source MACT VVVVV – Chemical Manufacturing Area Sources.

NSPS Kb – Applicable conditions are incorporated into the permit.

APPLICABLE FUGITIVE DUST CONTROL PLAN CONDITIONS:

N/A. All lots are paved.

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MAERS REPORT REVIEW:

2013 MAERS was submitted on time. However, a review indicates noncompliance with tanks limits. Additional information was submitted on 7/21 and is being reviewed.

FINAL COMPLIANCE DETERMINATION:

At this time, based on permit conditions evaluated in this report, facility appears to be in compliance. However, several items are pending further information.

Follow up items:

- Recalculated MAERS data
- There are also 3 tanks in here labeled tergitol and DEA; each 6000 gallon capacity. Check exemption status.
- There are old Wayne County permits listed in permit cards that should be voided

NAME Kate Kosh

DATE 7/23/14

SUPERVISOR W.M.