

N1105
MAWIK

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

N110541598

FACILITY: DHAKE INDUSTRIES		SRN / ID: N1105
LOCATION: 15169 NORTHVILLE RD, PLYMOUTH		DISTRICT: Detroit
CITY: PLYMOUTH		COUNTY: WAYNE
CONTACT: Arjun Dhake , Vice President Business Development		ACTIVITY DATE: 01/27/2017
STAFF: Jill Zimmerman	COMPLIANCE STATUS: Compliance	SOURCE CLASS: Minor
SUBJECT: Target Inspection		
RESOLVED COMPLAINTS:		

DATE OF INSPECTION : 01/27/2017
 TIME OF INSPECTION : 9:45 am
 LEVEL OF INSPECTION : II
 NAICS CODE : 325510
 EPA POLLUTANT CLASS : VOC
 INSPECTED BY : Jill Zimmerman
 PERSONNEL PRESENT : Arjun Dhake, Vice President Business Development
 FACILITY PHONE NUMBER : 734-420-0101
 FACILITY EMAIL : adhake@dhakeindustries.com

FACILITY BACKGROUND

Dhake Industries is a paint mixing facility. A true minor source, the facility operates one shift per day, five days per week, about 37.5 hours per week. The facility was last inspected on August 18, 2011. The facility mixes paint in one of seven portable mixers or four stationary mixers. The facility operates 7:30 am through 4:00 pm Monday through Friday. The facility is planning to install an automated measuring line for adding the paint ingredients. No equipment for this planned project has been installed at this time. The facility manufactures both solvent based and water based paint internationally, with more solvent based paint being shipped internationally.

PPE REQUIRED

During the onsite inspection, I wore steel toed shoes and safety glasses.

COMPLAINT/COMPLIANCE HISTORY

One odor complaint was received on August 25, 2016. The odors were not confirmed. Additional odor complaints were received sporadically during the spring and summer of 2017. However, the odors have not been verified.

PROCESS EQUIPMENT AND CONTROLS

Dhake Industries operates seven portable paint mixers and four stationary mixers, all contained in a paint mixing room in the facility. Depending on the customers needs, approximately 60% to 70% of the product produced is water based paint, and the remainder is solvent based paint. The water based paints contain less than 1% VOCs, and the solvents based paint contains 3.3% VOCs. The paint ingredients are placed in the paint mixer container to begin this batch process. The ingredients are then mixed together and mixed forming the final product. The facility completes approximately three batches per day or 1,000 to 1,500 gallons per week. During the mixing, a cover is placed on the paint mixer to contain VOCs. When the containers are not being used to mix the product, they are covered to keep dirt and debris from setting into the container. When the paint is finished mixing, a plastic

cover, similar to a shower cap, is placed over the container until the paint is placed in the final container. Paint is sold in 1 gallon, 5 gallon and 55 gallon containers.

INSPECTION NARRATIVE

This unannounced inspection began with a pre-inspection meeting with Mr. Arjun Dhake, where I explained the purpose of the inspection. Mr. Dhake explained that no changes had been made to the process since the last time that this facility was inspected on August 16, 2011. The paint product is made as needed, so there is not extra product stored onsite.

After the pre-inspection meeting, Mr. Dhake escorted through the facility. One batch of paint was being mixed. The other mixing vessels in the mixing room were covered. The vessels are covered when not being used to keep dirt and debris out of the vessels.

Next we walked through a storage area where empty containers are stored. All containers that are to be used for mixing are stored with the shower cap covering inside the container so that when product is added, the cover is readily available. All used containers are sent to a facility to be recycled. Paint is only stored in new containers. All waste drums were covered and properly labeled.

APPLICABLE RULES/PERMIT CONDITIONS

Currently Dhake Industries owns two Wayne County Permits to install. Permit C-7125 allows the installation of a paint mix room exhaust system for 4 paint mixers, and was issued on 12/11/1985. Permit C-7984 allows the installation of a paint mixer / high speed dispersion mill and was issued on 2/17/1988.

The special conditions for C-7125 are:

16. COMPLIANCE – Facility cannot produce more than 200,000 gallons of paint per year. Mr. Dhake stated that the facility produces 20,000 gallons to 25,000 gallons of paint per year.
17. COMPLIANCE – Based on the production of 25,000 gallons of paint produced, and the EPA emission factors from MAERS, the facility emitted about 0.06 tons of VOC in the last year which is less than the limited 9.71 tons per year.
18. COMPLIANCE – The facility is operating 7.5 hours per day, 5 days per week, which converts to 1950 hours, which is less than the limited 2000 hours annually.
19. COMPLIANCE – All paints must be covered. All paints were covered during the onsite inspection.
20. COMPLIANCE – All solvent must be stored covered. All raw materials were stored covered in a storage room.
21. COMPLIANCE – The minimum stack height is 24 feet, the roof of the building is at least 30 feet, and the stack is taller than the roof.
22. UNDETERMINED – During the past year, paint odor complaints have been received. These odors have not been verified. Odor surveillance will continue in the area in an effort to verify the source of the odor complaints.

The special conditions for C-7984 are:

16. COMPLIANCE – No VE's were seen coming from the mixer during the onsite inspection. One batch was being mixed and a second batch was about to be mixed during the onsite inspection.
17. COMPLIANCE – Only one mixer was being used during the onsite inspection. A second mixer as being prepared to be used. The remaining 3 mixers were not being used.

18. COMPLIANCE – All conditions of Wayne County Permit C-7125 were in compliance during the onsite inspection. Recent odor complaints have not been verified. Surveillance in the area will continue in an effort to verify the source of the odors.

MAERS REPORT REVIEW

NA

FINAL COMPLIANCE DETERMINATION

Dhake Industries appears to be operating in compliance with all state and federal regulations, as well as all permit conditions as of the onsite inspection on January 27, 2017. Odor surveillance will continue in response to the odor complaints.

NAME 

DATE 9/25/17

SUPERVISOR JK