

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

N309664525

FACILITY: General Chemical Corp		SRN / ID: N3096
LOCATION: 12336 EMERSON DR, BRIGHTON		DISTRICT: Lansing
CITY: BRIGHTON		COUNTY: LIVINGSTON
CONTACT: Andre Anderson III , Supply Chain Manager		ACTIVITY DATE: 09/13/2022
STAFF: Matthew Karl	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: Unannounced, scheduled inspection to determine compliance with Michigan's Air Pollution Control Rules and to determine the applicability of any federal regulations.		
RESOLVED COMPLAINTS:		

Purpose:

The purpose of this inspection was to determine General Chemical Corp’s (N3096) compliance with Michigan’s Air Pollution Control Rules and the applicability of any federal regulations. The facility was last inspected on 08/27/2015 to determine compliance with applicable exemptions. The facility currently does not hold any air use permits.

Facility Description:

The facility stores, blends and packages specialty chemicals. The products include foundry chemicals, liquid peelable masking, lubricants, paint strippers, soldering fluxes, and vanishing oils. Equipment consists of storage and mixing tanks. Descriptions of the emission units and the applicable exemption are included in the table below:

Emission Unit Description	Applicable Exemption
Peelable coating mix tank	R 336.1284(2)(i) The requirement to obtain a permit to install does not apply to containers, reservoirs, or tanks used exclusively for any of the following: Storage, mixing, blending, or transfer operations of volatile organic compounds or noncarcinogenic liquids in a vessel that has a capacity of not more than 40,000 gallons where the contents have a true vapor pressure of not more than 1.5 psia at the actual storage conditions.
Three (3) hydrobromic acid tank with 5,000-gallon capacity	R 336.1284(2)(i)
Benzyl alcohol tank with 4,500-gallon capacity	R 336.1284(2)(i)

Vanishing oil tank	<p>R 336.1284(2)(c)</p> <p>The requirement to obtain a permit to install does not apply to containers, reservoirs, or tanks used exclusively for any of the following:</p> <p>Storage and surge capacity of lubricating, hydraulic, and thermal oils and indirect heat transfer fluids.</p>
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Inspection:

I (Matt Karl) met on-site with Andre Anderson II. We discussed the equipment present at the facility. There have not been any significant changes to the operations or equipment present since the last inspection. The emission unit descriptions and applicable permit exemptions still apply to the equipment present. Andre provided me with a floor plan of the facility. General Chemical Corp. rents ~75% of the building to other companies. General Chemical Corps operations are only contained in a few areas throughout the building. We performed a walkthrough of the facility.

I observed the acid mix room, which consists of three (3) hydrobromic acid tanks with 5,000-gallon capacity. The mix station has a hood and exhaust system, and each of the three tanks are tied into the exhaust system. The exhaust system is equipped with a filter control. The exhaust system has annual maintenance performed on it where the filter is replaced, the joints are replaced, and the ductwork is cleaned. The catwalk next to the acid tanks has had a rail added since the last inspection for safety purposes

I observed the coating mix area also had a hood and an exhaust system with a filter control.

I observed the exterior hydrobromic acid storage tank with storage capacity of 5,200 gallons. The exterior storage tank is equipped with a Duall Air & Water Technologies scrubber control. The scrubber control has its media replaced once a year.

The storage tank room consists of a deionized (DI) water tank, a non-hazardous resin tank, a benzyl-alcohol tank and a hydrocal lubricant (vanishing oil) 6,000-gallon tank. There is also an unused tank and an emergency spill tank. In the event of a spill there is a sump pump in the corner of the room that would pump any spilled contents into the emergency spill tank. There is also an exhaust system with a filter control in the room to deal with any vapors in the case of a spill.

The silicone mix tank is also equipped with an exhaust system with filter control.

The facility has a spill prevention plan and has contracted with a third party (Michigan Clean Water Solutions) to perform quarterly checks. The facility collects stormwater runoff samples after major precipitation events and has spill kits on site.

The facility stores final goods on shelves. Raw material drums are stored on pallets or shelves.

I noted waste solvent drums, which were kept covered. The facility contracts with US Industrial to dispose of waste solvent drums. Pick of waste occurs when there are 6 totes or multiple pallets of drums to dispose of.

The facility keeps track of the contents of materials used on a batch basis using material safety data sheets (MSDS) which it keeps electronic and hard copies of.

Conclusions:

At the time of the inspection, General Chemical Corp (N3096) was in compliance with Michigan Air Pollution Control Rules and does not appear to be subject to any federal regulations.

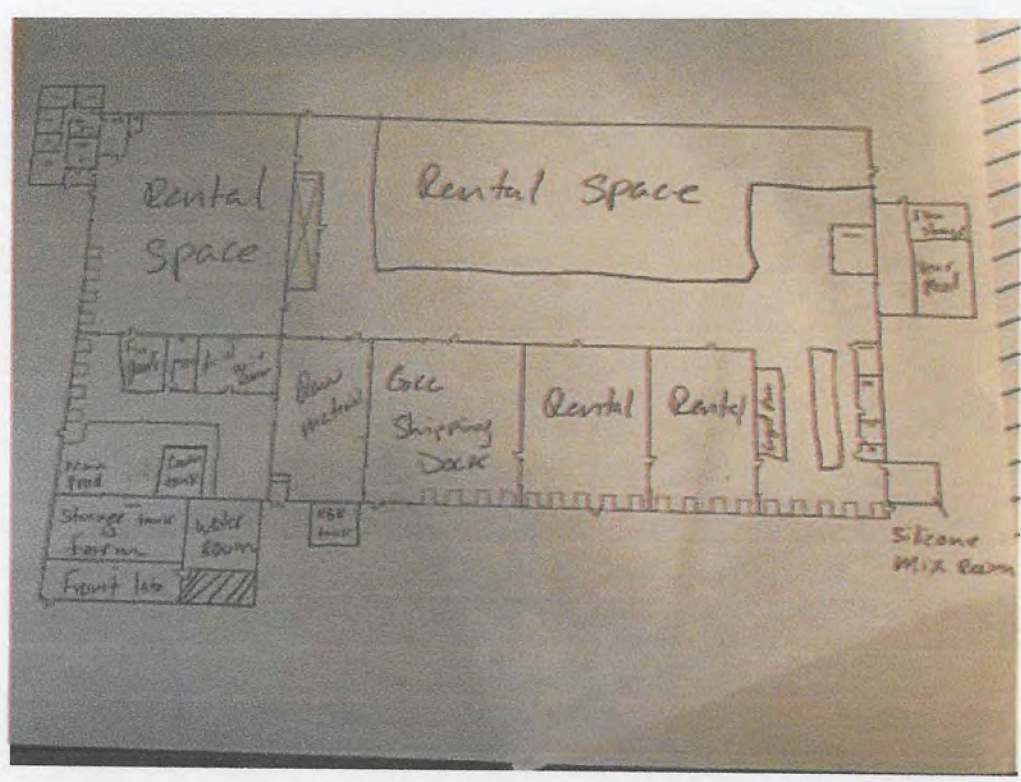


Image 1(Floor Plan) : Floor Plan of Facility

NAME Matthew R. Karl

DATE 09/13/2022

SUPERVISOR RB