

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

P035623755

FACILITY: ARROW CHEMICAL PRODUCTS INC.		SRN / ID: P0356
LOCATION: 2067 STE ANNE ST., DETROIT		DISTRICT: Detroit
CITY: DETROIT		COUNTY: WAYNE
CONTACT: Nanci Wallace , Owner		ACTIVITY DATE: 12/04/2013
STAFF: Todd Zynda	COMPLIANCE STATUS: Compliance	SOURCE CLASS: Minor
SUBJECT: FY 2014 Targeted Inspection		
RESOLVED COMPLAINTS:		

REASON FOR INSPECTION: Targeted Inspection
 INSPECTED BY: Todd Zynda, AQD
 PERSONNEL PRESENT: Nanci Wallace, Owner
 FACILITY PHONE NUMBER: 313-237-0277
 FACILITY FAX NUMBER: 313-237-0279
 FACILITY WEBSITE: www.arrowchemicalproducts.com

FACILITY BACKGROUND

Arrow Chemical Products, Inc. (ACP), a manufacturer of cleaning products, is located at 2067 Saint Anne Street, Detroit, Michigan. ACP currently has 22 employees and operates Monday through Friday from 7:00 AM to 4:30 PM. The facility comprises three buildings, used for storage, office, and production. Residential properties are located immediately to the south and east. A commercial/industrial property is located to the west. A rail line is located to the north.

PROCESS OVERVIEW

ACP manufactures cleaning products for the following industries: food service, health care, education, hospitality, industrial, automotive, building contractors. ACP operates 22 mixing and storage tanks ranging from 300 gallons to 4,500 gallons in volume, three silk screen printing lines, two automated fill lines, and two manual fill lines.

The facility receives raw materials from various chemical distribution companies in the area and blends the chemicals into a variety of cleaning products via a product-specific recipe. No chemical reactions are involved in the process; products are produced by mixing varying amounts of raw materials and water or by mixing dry powders. Cleaning products are packaged in bulk containers for janitorial service sales and in small containers for consumer sales.

COMPLAINT/COMPLIANCE HISTORY

The most recent complaint occurred on June 4, 2012. At that time a bleach-like odor was detected in the vicinity of ACP. As a result of the odors detected during the complaint investigation in the vicinity of ACP, AQD performed a self-initiated inspection of the facility. The inspection resulted in a Rule 201 violation. The violation was resolved through ACP obtaining a PTI to operate the chemical manufacturing facility. Facility operations could have been exempt from PTI requirements through the Rule 290 exemption, but ACP opted for a PTI to ease the rigorous record keeping requirements under Rule 290.

OUTSTANDING CONSENT ORDERS

None

OUTSTANDING VIOLATION NOTICES

None

INSPECTION NARRATIVE

On December 4, 2013 the Michigan Department of Environmental Quality (MDEQ) Air Quality Division (AQD)

inspector, Mr. Todd Zynda conducted an unannounced level 2 inspection of ACP. During the inspection, Ms. Nanci Wallace provided information and a tour of facility operations relating to air quality permits.

The inspection was conducted to determine the facility's compliance with the Natural Resources and Environmental Protection Act (NREPA), Act 451, Part 55, and permit to install (PTI) No. 20-13.

At 9:00 AM, AQD staff arrived onsite and performed outside observations. Visible emissions were not observed and odors were not detected at the time of the inspection. At 9:15 AM Mr. Zynda entered the facility, stated the purpose for the inspection, and was greeted by Ms. Wallace. During the opening meeting PTI 20-13 record keeping requirements and facility operations were discussed. Ms. Wallace displayed records that are maintained on a monthly basis. The records track raw materials and hydrochloric acid used along with volatile organic compound (VOC) and hydrochloric acid (HCl) calculated emissions. Mr. Zynda stated that the even though 12 months has not occurred since ACP began maintaining records, that the 12-monthly rolling spreadsheets should be maintained as required in PTI 20-13. It was agreed that ACP would provide the records through November 2013 by December 11, 2013.

Following an introductory meeting, a tour of the facility was conducted. During the tour the following equipment was observed: mixing and storage tanks ranging from 300 gallons to 4,500 gallons in volume, three silk screen printing lines, two automated fill lines, and two manual fill lines were observed. ACP operations occur in three buildings. The building located at 2055 St. Anne is used for office space and warehouse storage. No blending occurs at this address. The building located at 2067 St. Anne and the building ("across the alley") located adjacent to 20th Street, house the mixing and storage tanks, fill lines, and printing lines. The final product after mixed is filled quart, gallon, 5 gallon bucket, 55 gallon barrel, or 250 gallon tote plastic containers. During the inspection, one manual fill line and a silk screen printing line was in operation.

On December 11, 2013, ACP requested an extension on providing the required records. The extension request was granted. ACP provided the required records on December 18, 2013 (Attachment A). The records provided demonstrate that ACP is maintaining records of raw material used, along with calculated VOC and HCl emissions on a monthly basis. Since the facility has only been maintaining records since the issuance of PTI 20-13, records have only been maintained since April 2013. The 12-month rolling records have not been fully developed as 12 months has not passed since the beginning of record collection. As provided in Attachment A, the facility records the pounds of raw material used on a monthly basis. The pounds of material used is converted to gallons (using specific gravity) which is then multiplied by the appropriate emission factor.

APPLICABLE RULES/PERMIT CONDITIONS

Permit to Install No. 20-13

The Special Conditions (SC) are listed as appropriate. For brevity, permit conditions and the language of federal and state rules have been paraphrased.

SC I. 1. IN COMPLIANCE. VOC emissions shall be less than 9 tons per year on a 12-month rolling basis. As described above, ACP is maintaining monthly VOC emissions. Emissions from April 2013 through November 2013 are significantly less than 9 tons per year.

SC I. 2. IN COMPLIANCE. Hydrochloric acid (HCl) emissions shall be less than 3 tons per year on a 12-month rolling basis. As described above, ACP is maintaining monthly HCl emissions. Emissions from April 2013 through November 2013 are significantly less than 3 tons per year (Attachment A).

SC II. 1. IN COMPLIANCE. Raw materials used (excluding HCl and water) shall be less than 2.5 million gallons per year on a 12-month rolling basis. Records of raw materials used are maintained on a monthly basis. Raw material used from April 2013 through November 2013 is significantly less than 2.5 million gallons (Attachment A).

SC II. 2. IN COMPLIANCE. Hydrochloric acid usage shall be less than 250,000 gallons per year on a 12-month rolling basis. Records of hydrochloric acid used are maintained on a monthly basis. Hydrochloric acid used from April 2013 through November 2013 is significantly less than 250,000 gallons (Attachment A).

Permit to Install Exempt Equipment

Silk Screen Printing

The silk screen printing lines are exempt from PTI requirements under the following rule.

R336.1287(e): "The requirements to obtain a permit to install does not apply to...a silkscreen process".

APPLICABLE FUGITIVE DUST CONTROL PLAN CONDITIONS:

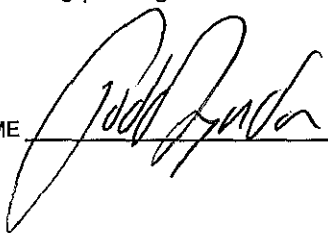
Not Applicable. All lots are paved.

MAERS REPORT REVIEW:

The facility is not required to submit Michigan Air Emissions Reporting System (MAERS).

FINAL COMPLIANCE DETERMINATION:

The facility is in compliance with PTI No. 20-13 and current federal and state air quality regulations. The silk screening printing lines are exempt from PTI requirements under Rule 287(e).

NAME 

DATE 12/19/13

SUPERVISOR 