

N1105  
MAY 14DEPARTMENT OF ENVIRONMENTAL QUALITY  
AIR QUALITY DIVISION  
ACTIVITY REPORT: On-site Inspection

N110573019

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: 05/31/2024
STAFF: Jill Zimmerman	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: Target Inspection		
RESOLVED COMPLAINTS:		

DATE OF INSPECTION : 05/31/2024  
TIME OF INSPECTION : 10:00 am  
INSPECTED BY : Jill Zimmerman  
PERSONNEL PRESENT : Arjun Dhake  
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 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 manufactures both solvent based and water-based paint. Approximately 54% of the paint produced is shipped internationally to countries such as Canada, China, Mexico and India.

## PPE REQUIRED

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

## COMPLAINT/COMPLIANCE HISTORY

In the past, this facility has been the suspected source of odor complaints in the area. However, no odor complaints have been received in the past 12 months from the inspection date.

## 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. The water-based paints contain less than 1% VOCs, and the solvent-based paint contains 3.2% VOCs. The paint ingredients are placed in the paint mixer container to begin this batch process. The ingredients are then mixed together

to form 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, like 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**

As I was walking into the facility, I did not detect paint odors outside of the facility.

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. The paint product is made as needed, so there is not extra product stored onsite.

After the pre-inspection meeting, Mr. Dhake escorted me 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.

The facility operates a quality lab to determine that the paint product meets the quality standards. A small sample of paint from each batch is sprayed on a metal test piece to check for quality standards, such as color, and thickness. The paint is sprayed in a small paint booth. Records for each test spray are maintained onsite and were reviewed during the onsite inspection. Filters were present in the paint spray booth. The facility uses about 1 or 2 gallons of paint per month in this booth.

## **APPLICABLE RULES/PERMIT CONDITIONS**

Currently Dhake Industries operates under 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:

1. COMPLIANCE – Facility cannot produce more than 200,000 gallons of paint per year. Mr. Dhake stated that the facility produced about 90,000 gallons of paint in the last year or about 400 gallons of paint per day.
2. COMPLIANCE – Based on the production of 90,000 gallons of paint produced and the maximum VOC content of the paint as 3.2%, the facility emitted about 1.44 tons of VOC in the last year which is less than the limited 9.71 tons per year.
3. 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.
4. COMPLIANCE – All paints must be covered. All paints were covered during the onsite inspection.
5. COMPLIANCE – All solvent must be stored covered. All raw materials were stored covered in
6. COMPLIANCE – During the past 12 months no odor complaints have been recieved.

The special conditions for C-7984 are:

1. COMPLIANCE – No VE's were seen coming from the mixer during the onsite inspection.
2. 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.
3. 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.

#### **SLEIS 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. Odor surveillance will continue in response to any future odor complaints.

NAME 

DATE 8/12/24

SUPERVISOR JK