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

P047263396

FACILITY: Park Metallurgical Corp		SRN / ID: P0472
LOCATION: 6100 Vancouver Street, DETROIT		DISTRICT: Detroit
CITY: DETROIT		COUNTY: WAYNE
CONTACT:		ACTIVITY DATE: 05/24/2022
STAFF: Jorge Acevedo	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: Inspection		
RESOLVED COMPLAINTS:		

REASON FOR INSPECTION: Self-Initiated Inspection

INSPECTED BY: Jorge Acevedo(author), Jon Lamb, AQD

PERSONNEL PRESENT: Jack Hafendorfer , Warehouse Manager

FACILITY PHONE NUMBER: (734) 6737701

FACILITY WEBSITE: <https://www.duboischemicals.com/>

FACILITY BACKGROUND

DuBois is a leading single source specialty chemical supplier to the manufacturing, food and beverage, paper and pulp, and water treatment industries. Previously, the facility was Park Metallurgical, which was a subsidiary of Heatbath. DuBois acquired Heatbath in 2015. The corporate headquarters is located in Sharonville Ohio.

The facility is located at 8074 Military Avenue (South Building), and 6100 Vancouver Street (North Building), Detroit, Michigan. East and west of the South Building are industrial or commercial businesses. To the south of the South Building is an abandoned property (formerly industrial use).

PROCESS OVERVIEW

Dubois Chemicals' Detroit facility located at 6100 Vancouver Street is mainly a storage and distribution facility. The new operation began operating in 2021. Manufacturing in the building ceased in 2017 according to representatives from Park Metallurgical during the last inspection in 2017.

COMPLAINT/COMPLIANCE HISTORY

The Air Quality Division (AQD), Detroit Office, received several odor complaints over the past few weeks prior to conducting the on-site inspection. The purpose of the inspection was to determine the source of the odors.

The most recent inspection was conducted during June 26, 2017 by the Air Quality Division. At that time, it was determined that the facility was operating in compliance with applicable regulations. The facility was in the process of shuttering the facility.

OUTSTANDING CONSENT ORDERS

None

OUTSTANDING VIOLATION NOTICES

None

INSPECTION NARRATIVE

On May 24, 2022 the Michigan Department of Environment, Great Lakes, and Environment, AQD inspector Jorge Acevedo and Jon Lamb conducted an onsite inspection of Dubois Chemicals located at 6100 Vancouver Street, Detroit, Michigan. This was in response to several odor complaints received by the AQD Detroit Office over the previous weeks.

We arrived at the facility at 10:AM. Prior to arriving, We performed surveillance near the building. The company's south building appeared vacant. In the previous inspection(2017), it was shuttered as well. We entered the facility and met with the warehouse manager, Jack Hafendorfer. We explained the purpose of the inspection. We explained to Jack that we were there in response to complaints we received. Jon also explained to Jack that he performed odor surveillance the previous week and it appeared that the odors were coming from Dubois Chemicals. Jack mentioned that he has noticed odors from a nearby pallet/composting facility. Jon explained that the odor that he detected was of a chemical nature and not a compost or burning type of odor.

When we entered the facility, we did not observe any activity and we did not pick up any odors. Jack explained to us that DuBois purchased Park Metallurgical several years ago and that Dubois started operating in the building in 2021. Jack explained that the facility serves as a distribution hub where it brings in shipments twice a week and they ship off chemicals every day. They store chemicals in various containers ranging from 5 gallons to 330 gallon totes. Jack showed us one machine that they still use to process salt pellets. The machine essentially takes larger bags(2000 lbs) and fills 50 lb bags. There are minimal emissions and vented inside. The machine is used rarely and the entire process is about a hour and half. Jack showed us the silos and said that nothing has changed since the last inspection(2017). The silos were emptied out several years ago. Jack showed us the scrubber, which has not been used since 2016. We walked the entire warehouse and saw a variety of chemicals stored. We did not observe any equipment, exempt or non exempt, operating during the inspection.

After doing the walk through, we went back to a conference room. It appears that the equipment that previously operated under PTI 104-13 is no longer operating. We talked to Jack about voiding the PTI and he gave us a couple of company contacts that she should follow up with.

Deonta Waller 513 833 4911

Andy Law 513-766-6623

Jack provided us with some Safety Data Sheets for chemicals storing Sulfuric Acid and Phosphoric Acid. The sheets showed that they were less than 99% and 20% by weight, respectively. We left our contact information with Jack and he provided us a contact number for him in case we received future complaints. We left the facility at 10:49AM.

On June 28, 2022, I spoke to Andrew Law, Vice President, Engineering and Regulatory, and described AQD's findings and asked if DuBois Chemicals would like to have PTI 104-13 voided. He indicated that they would. I told him I would initiate the process and that a letter would be mailed to him when the PTI is finally voided.

APPLICABLE RULES/PERMIT CONDITIONS

Compliance with PTI 104-13 is described below:

The following conditions apply to: FGPLANT4SCRUBBER

DESCRIPTION: Dry powder mixers, a railcar/silo filling station, and a salt briquetter. Dust from these emission units are routed through a wet scrubber.

Emission Units: EUPOWDERMIXER01, EUPOWDERMIXER02, EUPOWDERMIXER03, EUPOWDERMIXER04, EUPOWDERMIXER05, EURAILCARLOADING, EUSALTBRIQUETTER.

POLLUTION CONTROL EQUIPMENT: Wet scrubber system ("Plant 4 Scrubber 01").

I. EMISSION LIMITS

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Compliance Determination

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Compliance Determination
1. PM10	2.0 pph	Test Protocol*	FGPLANT4SCRUBBER	Not Operating- Water line for scrubber was disconnected. Facility no longer manufacturing .

II. MATERIAL LIMITS

N/A

III. PROCESS/OPERATIONAL RESTRICTIONS

N/A

IV. DESIGN/EQUIPMENT PARAMETERS

1. The permittee shall not operate the mixers and other equipment controlled by the fume wet scrubber (FGPLANT4SCRUBBER) unless the wet scrubber system is installed, maintained, and operated in a satisfactory manner. (R 336.1331, R 336.1910)

Not Operating- Mixers are no longer used. Water line for scrubber was disconnected.

V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years. (R 336.1201(3))

N/A

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. (R 336.1201(3))

1. The permittee shall monitor and record the scrubber liquid flow rate for FGPLANT4SCRUBBER once each shift that the scrubber operates. (R 336.1910)

Not Operating- Scrubber is no longer used. Water line for scrubber was disconnected.

VII. REPORTING

N/A

VIII. STACK/VENT RESTRICTIONS

The exhaust gases from the stack(s) listed in the table below shall be discharged to the ambient air as noted:

Stack & Vent ID	Maximum Exhaust Diameter/ Dimensions (inches)	Minimum Height Above Ground (feet)	Compliance Determination
1. SV01	24"x24"	10	Compliance- Height and diameter appeared correct. Scrubber is no longer used.

IX. OTHER REQUIREMENTS

N/A

APPLICABLE FUGITIVE DUST CONTROL PLAN CONDITIONS:

Not applicable. Fugitive dust was not observed to be a problem during the inspection.

APPLICABLE EXEMPTIONS

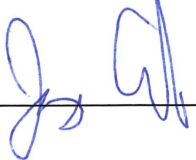
The facility stores several chemicals in containers ranging from 5 gallon to 330 gallon container. The sulfuric acid is 93% by weight and phosphoric acid is 1% by weight. Rule 336.1284 (h)(i) and R336.1284(h)(ii) address sulfuric acid and phosphoric acid weight percentages. The chemicals stored are below these thresholds.

MAERS REPORT REVIEW:

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

FINAL COMPLIANCE DETERMINATION:

At this time, this facility is not operating equipment and is only used for storage and distribution. The facility does not operate any cold cleaners or emergency generators. AQD will proceed with requesting the Permit Section to void PTI 104-13.

NAME 

DATE 6-28-22

SUPERVISOR April L. Wendling
6-29-2022