

B4354
MAY 14

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

B435450747

FACILITY: RECYCLING AND TREATMENT TECHNOLOGIES OF DETROIT		SRN / ID: B4354
LOCATION: 530 ROUGE ST S, DETROIT		DISTRICT: Detroit
CITY: DETROIT		COUNTY: WAYNE
CONTACT:		ACTIVITY DATE: 09/12/2019
STAFF: Stephen Weis	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: Compliance inspection of the Recycling and Treatment Technologies of Detroit facility in Detroit. The facility was added to my list of sources scheduled for inspection in FY 2019.		
RESOLVED COMPLAINTS:		

Location:

Recycling and Treatment Technologies of Detroit

(SRN B4354)

530 Rouge Street

Detroit

Date of Activity:

Thursday, September 12, 2019

Personnel Present:

Steve Weis, EGLE-AQD Detroit Office

Jeff Benya, EGLE-AQD Detroit Office

Issam Musaibli, U&I Properties

Don Kaniowski, Clean Earth Inc. (via telephone)

Purpose of Activity

A self-initiated inspection of the Recycling and Treatment Technologies of Detroit facility (hereinafter "RTTD") was conducted on Thursday, September 12, 2019. RTTD was on my list of sources targeted for an inspection during FY 2019. The purpose of this inspection was to determine compliance of operations at the RTTD facility with applicable rules, regulations and standards as promulgated by Public Act 451 of 1994 (NREPA, Part 55 Air Pollution Control) and Federal standards. The facility is also subject to the terms and conditions of Permit to Install No. 181-13, which was issued on April 15, 2014.

Facility Site Description

The RTTD facility operated as a liquid waste treatment and recycling facility. The facility occupies a parcel of land roughly 5 acres in size that is located at the northwest corner of Fordson and

Ormond Streets in the portion of Southwest Detroit bounded by Dix Street, Oakwood Blvd. and the Rouge River. The facility consists of a few building structures (facility offices, the treatment building, a boiler house and a filtration building), several above ground liquid storage and treatment tanks, and some below grade liquid storage and treatment tanks and pits. A site description drawing is attached to this report for reference, as well as a site map from Google Earth that shows the layout of the facility.

The area immediately adjacent to the RTTD facility along Fordson Street is a mix of commercial and industrial properties, with a variety of automotive repair, welding and fabrication, and auto salvage type businesses. Much of the areas to the north, west and south of RTTD contain some of the area's notable heavy industrial facilities. The area to the west of Dix Avenue features the AK Steel operations (on the opposite side of the Rouge River), an Edward C. Levy slag processing facility, a Sunoco Terminal and the Cadillac Asphalt Plant. The Marathon Petroleum refinery is located about ½ mile south of RTTD along Oakwood Blvd. The closest residential neighborhood, called Oakwood Heights, lies just over ¼ mile to the east/southeast of the RTTD facility. This neighborhood used to feature a dense concentration of residential properties, but as a result of buyout offers from Marathon when the refinery expanded, Oakwood Heights has become sparsely populated over the past several years.

Facility Operations

The RTTD facility and associated property has been owned by Central Ohio Oil, a company based in Columbus, Ohio. Central Ohio purchased the RTTD facility in January of 2014.

As mentioned in the last section of this report, the RTTD facility operated as a liquid waste treatment facility. When RTTD was in operation, materials were brought to the facility by liquid hauling trucks for treatment, and finished product and treatment by-product materials were similarly shipped from the site via liquid hauling trucks. The waste materials that were received at RTTD were treated to separate and remove recoverable and reusable petroleum product in the incoming waste stream from water and solids. RTTD has an active Permit to Install (PTI) that permits the company to accept used oil, oily wastewaters, wastewater, and recycled petroleum products at the facility for treatment, recycling and disposal.

During my most recent previous site visit at the RTTD facility on August 16, 2018, I was told by the Plant Manager at that time, Don Kaniowski, that facility operations were very limited. He told me that most of the process equipment that is part of EU-OIL in the facility's PTI has not operated in the time since the PTI was issued in 2014. Don said that the controls for the boilers are damaged beyond repair, and as a result, none of the boilers at the facility had operated since February of 2015. Don told me that the storage tanks designated in the EU-STORAGE Emission Unit in the PTI were empty and no longer in use, and all but a few of the tanks in the facility's treatment building were empty and had not been used since the facility's PTI was issued in 2014. Don mentioned that there were thoughts of selling the property.

During a site visit to Clean Earth, Inc. (SRN A8065) on August 16, 2019, I spoke with Don Kaniowski; he is now working at Clean Earth. During the site visit, Don told me that RTTD has ceased operations, and that the facility property is in the process of being sold. He told me that he has been in contact with the new owners/tenants of the property, answering questions that they have about the property and the buildings and equipment that remain on it.

Inspection Narrative

After receiving the information from Don regarding the operational status of the RTTD facility, I visited the RTTD facility later on August 16. I noted that there was a sign affixed to the property's perimeter fencing on the Fordson Street frontage that reads "Knaggs Trucking 530 S Rouge". I also observed that the large empty storage tank that is located on the south side of the Fordson entrance to the property had been disturbed, with a portion of the exterior shell having been removed. I took a picture of the Knaggs Trucking sign that also shows the storage tank; a copy of the picture is attached to this report for reference. I surveyed the facility from the Ormond Street side, and I observed a pile of debris on the south side of the main processing building in the area that was used for truck loading of product. I took a picture of the debris pile, which is attached to this report for reference. I also observed a smaller debris pile outside of the office and laboratory building. I was concerned that demolition and equipment removal was taking place on the property that could involve disturbing asbestos containing material (ACM). I notified AQD-Asbestos Program staff, sending them an e-mail that included the picture. It was agreed that I would visit the site, accompanied by an AQD-Asbestos Unit staff person.

On September 12, 2019, I visited the RTTD site with Jeff Benya, Asbestos Program staff from the AQD-Detroit Office. Jeff and I arrived at the facility at 10:45am, entered via the Fordson Street driveway, and we were met by Issam Musaibli, who identified himself as being with U&I Properties. He told us that U&I had entered into a purchase agreement with RT Holdings of Ohio (hereinafter "RT"), who had been the owner/operator of the RTTD facility (presumably as a subsidiary of Central Ohio Oil), in March of 2019. He explained that Knaggs Trucking was involved with U&I, and that the RTTD property was purchased to use it as the location of a trucking business. Jeff and I asked him about what appeared to be demolition and equipment removal projects at the site. He told us that U&I has been working to have items left by RTTD scrapped, and to have the property cleaned up. He called a person that he identified as the owner of U&I, Rico Elgrami, to pose some of our questions to him. Rico recommended contacting Don Kaniowski, stating that Don has been his resource regarding the specifics involving the facility. Issam called Don, and put the phone on speaker while he, Jeff and I walked around the facility property.

Don provided us with some background about the transfer of ownership of the RTTD facility property. He said that the property was purchased from RT Holdings in March 2019, and that part of the purchase agreement is that RT is responsible for clean up at the site. We began speaking with Don when we were in the area that was designated as the K-Area that includes three vertical tanks that were designated as K1, K2 and K3 and were used to treat K listed waste material, and a horizontal tank. These tanks have been unused and empty for some time, and Don confirmed that these tanks were emptied, triple rinsed, and a closure plan for these tanks was submitted to and approved by DEQ's Storage Tanks Division in 2012. The K-Area tanks were addressed as the EU-RPP Emission Unit in the RTTD facility's PTI. We walked by the below grade receiving pits that were identified as the A pits by RTTD; Don told us that the material in these pits was analyzed by Bucks Oil, and that RT is still removing material from the pits. He said that RT is working with Envirosolids (SRN B9080) to remove the material from the pits.

We took a look at the large tank near the Fordson driveway. Jeff asked if an asbestos survey has been done at the facility. Don replied that a baseline environmental assessment (BEA) and an

asbestos survey had been performed around 2013 when Magnus International Group was the owner of the facility. Don recalled that samples had been taken of the shell material from the two 365,000-gallon empty storage tanks that were identified as Tanks 60 and 61 and located at the northeast part of the property, as well as of insulation materials in the processing building and the filter press building. He was not sure if RT Holdings or Magnus would be in possession of the BEA-related documents. He offered that RTTD's environmental consultant, Rick Harding of Integrated Environmental in Livonia, MI, was involved with the BEA. Don suggested that either Rick Harding or Eric Lofquist of Magnus would be good points of contact regarding the information from the BEA. Issam said that he recalled that Rico Elgrami had received a copy of the information on behalf of U&I Properties, and he provided us with Rico's phone number and U&I's business address.

We then toured the processing building. The processes/tanks inside of this building were addressed by the EU-OIL Emission Unit in PTI No. 181-13. Don told us that the tanks in the processing building had been emptied and cleaned by RT, and that Envirosolids is interested in purchasing the tanks, as well as the filter press. According to Don, the scrubber system, which had been purchased new in correlation with the issuance of PTI No. 181-13 but was never installed, was taken to Chicago by Magnus. He also said that Magnus took the pumps and the centrifuge that were in this building. I took some pictures of some of the tanks in the processing building that show the condition of the tanks on the date of the site visit, and some of them show the date that the tanks were emptied and cleaned. The pictures are attached to this report.

We walked through the building that formerly contained the facility's boilers. During my site visit in August 2018, Don told me that the controls for the boilers were damaged beyond repair, and that the boilers had not operated since 2015. The boilers have been removed from the facility. Jeff Benya took some pictures inside of this building that show the status of the boiler area on the date of the site visit. The pictures are attached to this report for reference.

Don told us that the horizontal tanks at the northwest corner of the facility (near the Fordson Street fence line), identified as Tanks 43-47, were emptied and cleaned by RT, and that these tanks are going to be scrapped. The below-grade pits identified as the B pits are going to be emptied and cleaned by RT. Don told us that the large open pits that are located to the north of Tanks 43-47 and the B pits had been emptied and cleaned 5-6 years ago, their liners removed, and the surface of the pits power washed. Don told us that he notified the Great Lakes Water Authority of the transfer of responsibility for the facility, and that the wastewater effluent discharge permits for RTTD were closed out.

Issam, Jeff and I walked to the building that was used as RTTD's office and laboratory. We walked inside and were shown the work that has been to this point in removing equipment from the building. Jeff discussed asbestos notification requirements. He was once again told that U&I was told that there was a survey done for asbestos on the property. Jeff made sure that he had the contact information for Rico Elgrami from U&I, and I provided Jeff with the contact information for Rick Harding of Integrated Environmental. It is assumed that Jeff is addressing any potential asbestos-related issues at the RTTD site. Jeff and I left the facility at 11:45am.

Based on the visual observations from the September 12 site visit and the accompanying discussion with Don Kaniowski, the process equipment that was associated with the RTTD facility has either been removed from the site, is in the process of being emptied and cleaned prior to

removal, and/or is awaiting scrapping. This includes the process equipment that is addressed in PTI No. 181-13. The process equipment looks to have been rendered inoperable; if an entity wanted to operate a facility similar to RTTD's on the facility property, they would need to install new equipment, new piping and connections.

Prior to the site visit, I had sent an e-mail message to Paul Owens (EGLE Remediation and Redevelopment Division - Warren District Supervisor) and Tracy Kecskemeti (EGLE Office of Waste Management and Radiological Protection – Warren District Supervisor) on August 19 to let them know of the change in ownership and responsibility for the RTTD facility property. Regarding Paul, I asked him who the new owners/operators of the site could contact with questions regarding whether any environmental assessments have been performed at the property, and how to address environmental issues on the property. Paul replied on August 30 that I could provide his contact information to the new owners of the property, and I provided his contact information to Don Kaniowski later that day. A copy of the e-mail exchanges is attached to this report.

Permits/Orders/Regulations

As previously referenced, Permit to Install No. 181-13 was issued to RTTD on April 15, 2014. The permit addressed the various liquid waste treatment related processes at the RTTD facility.

With the change in ownership/operational status of the facility and its associated property, the process equipment that was addressed by this permit has either been removed from the site, is in the process of being emptied and cleaned prior to removal, and/or is awaiting scrapping. For the purposes of the permit, the equipment that it addressed has been rendered inoperable. If an entity wanted to operate a facility similar to RTTD at the site, they would need to install some new process equipment, and would need to apply to EGLE-AQD for a new Permit to Install. Permit to Install No. 181-13 can be voided.

Compliance Determination

Based upon the results of the September 12, 2019 site visit and subsequent discussions, the RTTD facility has changed ownership. The process equipment that was operated by RTTD as part of their treatment operations, including the equipment that was addressed by PTI No. 181-13, is in the process of being emptied and cleaned prior to removal, and/or is awaiting scrapping. The RTTD facility operations have been rendered inoperable. Going forward, the property at 530 South Rouge in Detroit should no longer be associated with RTTD's operations.

Attachments to this report: a printout of the RTTD facility site plan; a Google Earth view of the facility and its property; copies of e-mail exchanges regarding the change in ownership/responsibility for the RTTD facility; pictures taken at RTTD in August and September 2019.

NAME

Steve W...

DATE

12/3/19

SUPERVISOR

JK