

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

B562732548

FACILITY: Nexeo Solutions, LLC		SRN / ID: B5627
LOCATION: 2011 TURNER ST, LANSING		DISTRICT: Lansing
CITY: LANSING		COUNTY: INGHAM
CONTACT: Mike Bommarito , Plant Manager		ACTIVITY DATE: 12/15/2015
STAFF: Nathaniel Hude	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: Completed FCE Inspection on the facility using PTI 95-15 and PTI 611-82A. No concerns were noted.		
RESOLVED COMPLAINTS:		

Inspection Report

B5627- Nexeo Solutions (formerly Ashland Chemical)
2011 Turner Street
Lansing, MI Inspection Date: 12/15/15

Facility Contacts:

Michael Bommarito- Plant Manager, 517-372-4166, mjbommarito@nexeosolutions.com

MDEQ AQD Personnel:

Nathan Hude – 517-284-6779, huden@michigan.gov

Facility Description:

Nexeo Solutions is a synthetic minor source of HAPs and VOCs and has an opt-out permit 95-15 which was issued on May 20, 2015. Nexeo does report to MAERS, but does not have a fee category.

Nexeo Solutions is a chemical distributor and packaging site. Many of the products they distribute can be found at local hardware's or home stores such as paint thinners. They also carry paint additives. Some simple blending is done onsite, but they do not use any sort of reactors. Products are packaged in 5 gallon pails, 55 gallon drums, 330 gallon totes, and 550 gallon totes.

The company employs 18 individuals and has two shifts; shift 1 is 7:00am-3:30pm and completes drum filling, bulk filling, mixing, and bulk receiving via semi; shift 2 is 1:00pm-9:30pm which monitors the site and conducts some filling of outbound tankers. The facility normally operates Monday through Friday, but does work a Saturday up to two times a year.

PPE required for the facility consists of hard hat, safety glasses and steel toe boots.

There are special entry considerations; entry should only be attained through the north gate on Turner Street. You will need to call 517-372-4166 to identify yourself and gain access.

Applicable Regulations:

PTI 611-82A

PTI 95-15

Previous Inspections:

8/27/14- Brian Culham, no concerns noted

6/21/11- Brian Culham, no concerns noted

8/26/10- Michael McClellan, no concerns noted

12/5/08- Michael McClellan, no concerns noted

Previous Violations:

4/24/14- 208a registration was not received, acceptable PTE provided by company proving minor source, resolved 7/30/14

Recent Complaints (within 2 years):

none

Inspection Key Concerns:

none

MAERS Reporting

NAICS 424690- Other Chemical and Allied Products Merchant Wholesalers

Fee Category- none

2014 Reporting Year Emissions- VOC 4 tons

MAERS Emission Units: twenty six tanks labeled EU-101 through EU-126, four tanks labeled EU-201 through EU-204, one tank labeled EU-302, EU-BOILER, EU-EMGEN, EU-FILLING, EU-FUGITIVE, and EU-LOADING.

Inspection Summary

This was a scheduled, unannounced, initial contact as the new inspector inspection.

I arrived onsite at approx. 8:40am, I did not see any VE's but did detect intermittent Level 1 VOC / paint thinner type odors while on Turner Street before entering the parking lot. There was a light wind out of the west with cloudy skies.

I entered the north gate and parked; as I exited my vehicle Mike met me. I introduced myself and informed him of why I was visiting. We went inside to the office area and sat down in a conference room. I provided Mike with a copy of my business card, the inspection brochure, and the boiler card. We reviewed the inspection brochure and outlined the inspection process. When asked, Mike replied that they have a boiler onsite. The boiler is used for heating two work areas in colder months; the heated storage area and the drum filling station. We then reviewed the boiler card and the regulation for "Area Sources of HAPs" 40CFR63 JJJJJJ to determine applicability. We were able to determine that they are not required to comply with the boiler MACT since the boiler is fueled by natural gas as listed under paragraph 63.11195.

We reviewed Permits 611-82A and 95-15 and then performed the inspection. The following is a review of the inspection in regards to conditions listed in each permit:

Inspection via 611-82A; Special Conditions (SC) 14-26

This permit has conditions for all equipment on site listed in the MAERS Reporting section of this report.

- SC's 14, 17, 21, and 25 are for a spray booth that was removed approx. 20 years ago. These conditions are no longer applicable.
- SC 24 requires tanks storing perchloroethylene and trichloroethylene to have carbon absorbers installed on the tank vents. Nexeo no longer stores perchloroethylene and trichloroethylene in bulk. SC 26 is also in reference to the carbon absorbers.
- SC 15 states there shall be no visible emissions from the paint spray booth (removed) and drum filling operation (EU-FILLING). During the inspection, EU-FILLING was not operational.
- SC 16 is in reference to the EU-BOILER and VE's. The boiler is natural gas fired and rated at max input rating 80,000 Btu/hr, max output rating 373,599 Btu/hr. There were no VE's.
- SC 18 is in reference substitutions of fuel which I believe is in regards to EU-BOILER. The boiler can only fire natural gas.
- SC 19 states the facility cannot handle / store any chemicals other than those listed in the permit application unless approved. The last updated materials list on file is from 1992. The company reports to MAERS using AP42 emission factors based on tanks type, color, size, and contents.
- SC 20 requires all tanks to have conservation vents unless storing methylene chloride, perchloroethylene, or trichloroethylene. Methylene chloride, perchloroethylene, and trichloroethylene are no longer stored in bulk tanks. These chemicals may be onsite, but would be stored in a 55 gallon drums, 330 gallon totes, or 550 gallon totes. I confirmed that all bulk tanks have 1-2 conservation vents installed. All tanks also have radar type sensors to monitor the content levels installed.
- SC 22 EU-FILLING stack conditions ≤8" diameter and 26' agl. I confirmed this by looking at the stack and it appears to meet the condition.
- SC 23 is a condition regarding noxious odors from the facility. There have not been recent complaints from the facility and the odor I detected that morning I would not consider noxious.

We observed the EU-LOADING station. This loading rack does not have specific condition or a control device for VOCs. As bulk chemicals are pumped from semi tankers, the void space is filled with nitrogen to create an atmosphere with minimal oxygen thus reducing the explosion hazard. As semi tankers are filled, they are also first filled with nitrogen which is then displaced as liquid is pumped into the tank; the nitrogen and VOCs are emitted directly to the ambient environment. Emission estimates for EU-LOADING are included in MAERS reporting, the estimates for 2014 was 1,238 lbs of VOC.

Inspection via 95-15

This permit does not list any emission units, but contains the Opt-Out limits for FG-FACILITY and all of the record keeping requirements of the site. The following information was gained by records check. Most records were provided in print for the period of August 2014 through September 2015 for 12 month rolling averages.

- SC I.1. Limit Individual HAP < 9.0 tpy rolling, Result aggregate HAPs 12 month rolling tpy 2.94
- SC I.2. Limit Aggregate HAP < 22.5 tpy rolling, Result aggregate HAPs 12 month rolling tpy 2.94
- SC I.3. Limit VOC < 90.0 tpy rolling, Result VOC 12 month rolling tpy 7.25
- SC II.1. Limit 37,151,000 gallon / year VOC containing material processed, Result 7,112,623 gallons

I did not look at EU-EMGEN but was told there were no changes. EU-EMGEN is a 30hp, 0.022mW, generator they claim is exempt per Rule 285(g). Emissions for this engine are included in the MAERS reporting; 2014 emissions were entered as 78lbs CO, 86lbs NOx, and 2lbs of VOC.

I departed the site at 10:25am with no concerns.

NAME

DATE

SUPERVISOR



1/28/16



