

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

B578528960

FACILITY: CHEMICAL PROCESSING INC		SRN / ID: B5785
LOCATION: 5485 CONCORD, DETROIT		DISTRICT: Detroit
CITY: DETROIT		COUNTY: WAYNE
CONTACT: Bruce Kafarski, President		ACTIVITY DATE: 03/24/2015
STAFF: C. Nazaret Sandoval	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: FY 2015 Targeted Inspection		
RESOLVED COMPLAINTS:		

AQD Source ID (SRN): B5785
Source Name: CHEMICAL PROCESSING INC.
Source Location: 5485 CONCORD ST, DETROIT, MI, 48211
Contact: Bruce Kafarski (bruce.kafarski@chemprocess.com)
Phone Number: 313 720-7542
Activity: FY2015 Targeted Inspection
Inspection Date: March 24, 2015
Report Date: August 3, 2015
Inspector Name: Nazaret Sandoval

FACILITY BACKGROUND

Chemical Processing Inc. is a small miscellaneous metal part coating facility that has been in operation at 5485 Concord Ave., Detroit, MI 48211, since 1950. The emissions resulting from the metallic surface coating lines are mainly a product of Volatile Organic Compounds (VOCs) containing materials, including coatings, reducers, solvents and thinners. The operations at the facility were first regulated by Wayne County Permits, C-11708 and C-11709, issued on 9/4/98. Years later, the state of Michigan DEQ under the Air Quality Division (AQD) issued permits to install (PTI) that incorporated the existing equipment covered by the old Wayne County permits, as well as new equipment and new air regulations.

The active permit for this facility is an opt-out permit to install PTI- 251-00A that was issued by AQD on March 17, 2008.

This company has been housed in the southern part of the building occupied by the former "Packard Automotive Plant", which was closed in 1956 and turned into an industrial park. The industrial park was forced out in 1999 by the City of Detroit while lawyers fought over the property in court. A record in AQD Detroit files from an inspection conducted at the facility in 1999 indicates that there was a court case pending concerning the demolition of the entire building. A small portion of the plant (the northern section –North of E. Grand Blvd) was torn down by the city before a court order halted the demolition. The plant was stripped by scrappers, leaving the plant as we see it today (see attached picture). Chemical Processing, Inc. has been the last remaining tenant at the former Packard Plant Complex. However, over the past five years the plating and coating operations have decreased and most of the equipment has been dismantled. On a recent update (7/30/15) I have learned that a presumed demolition project of the former Packard Building will not proceed any time soon. There will be abatement of the asbestos from the Administration Building of the Complex followed by the renovation of it, but not demolition. As of now, they won't be starting until September 14.

REGULATORY COMPLIANCE

MACES- Activity Report

The opt-out permit PTI- 251-00A includes general and special conditions covering the emission units listed below:

Description	Installed Date	Dismantled Date
DIP SPIN COATING-1	01/01/58	02/01/13
DIP SPIN COATING LINE 16B	07/14/98	12/20/14
GAS FIRED PARTS DRYER	01/01/86	12/31/14
PHOSPHATE LINE A	01/01/58	12/31/12
PHOSPHATE LINE - BC	01/01/73	12/31/12
PHOSPHATE LINE A. BURNER	01/01/58	12/31/12
PHOSPHATE LINE BC -BURNER	01/01/73	12/31/12
PHOSPHATE LINE BC DRYER	01/01/73	12/31/12
TUMBLE COATING	01/01/60	12/31/12
ZINC PLATING LINE	01/01/63	12/31/12
ZINC PLATING LINE HEATERS	01/01/63	12/31/12

This table lists the emission unit description and the installation and dismantled dates for the equipment operating at 5485 Concord Ave., Detroit, MI 48211, as they were recorded on the 2014 MAERS report.

The permit has limits associated with VOCs and HAPs: 10 tons per year VOC (12-month rolling time period as determined at the end of each calendar month); and 2,000 pounds / month VOC (per calendar month).

HAPs limits are as follows: less than 9 tons per year for each individual HAP and less than 22.5 tons per year aggregate HAPs (12-month rolling time period as determined at the end of each calendar month)

INSPECTION NARRATIVE

The purpose of the inspection was to determine the facility's compliance with the requirements of the Federal Clean Air Act; Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451); the administrative rules and the conditions of Permit to Install No. 251-00A

On March 24, 2015, I drove to the location of Chemical Processing Inc. at 5485 Concord Ave., Detroit, Michigan. I checked the entrance to the building and knocked the door but there wasn't anybody available to open the door. The building appeared to be completely empty in an isolated and devastated neighborhood. I took some pictures of the front area and returned to the office.

On March 26, 2015, I contacted Mr. Kafarski, the owner and president of Chemical Processing Inc. via email. I notified him that I had visited the Detroit facility to verify if coating operations were still taking place at that location. I added that I couldn't get a hold of anybody there. I requested an update in relation to the production operations at the above listed location.

On March 30, 2015 Mr. Kafarski sent me an email with a notification letter dated 3/30/15 indicating that CHEMICAL PROCESSING INC. had completely ceased its operations at 5485 Concord Ave., Detroit, MI 48211, as of December 31, 2014. In the letter Mr. Kafarski added that any equipment generating air pollutants was last used on December 29, 2014.

A formal permit compliance determination, which would have included a process equipment operation inspection and in-depth record review, was not feasible due to the apparent closure of the location.

COMPLAINT/COMPLIANCE HISTORY

The last inspection of this facility was conducted on July 22, 2010. As a result of that inspection the facility was found to be in violation of various conditions of PTI No.251-00A, mostly related to improper recordkeeping. A Violation Notice was issued to the facility on September 29, 2010 and a Second Violation Notice issued on November 17, 2010.

The alleged violations seemed to have been resolved with the submittal of the required records.

There have been no complaints involving the operations of this facility during the last five years.

MAERS REPORT REVIEW

During the period from 01/01/2014 to 12/31/ 2014 this facility operated under the Opt-Out Permit to Install (PTI No. 251-00A). Therefore, the facility was required to report their annual emissions under MAERS. MAERS report submittal was due on March 16. The facility failed to submit the report by the due date and the AQD sent a dunning letter dated April 6, 2015 requesting the immediate submittal. The online submittal was received on April 8, 2015.

MAERS report was reviewed and the emissions appeared to have been accurately reported, with a few comments that were provided to Mr. Kafarski via email and he made the revisions.

The operations in 2014 were limited to the dip-spin coating line left onsite. Emissions from emission unit EU- DIP-SPIN-16B were recorded in MAERS, as well as the associated cleanup solvent usage and the EU-PARTS DRYER operated with natural gas. The paint and solvent throughput decreased 25 % or more when compared with the 2013 records. Paint usage for year 2013 was 182.2 gals and 132.2 gals in 2014. Solvent usage in 2013 was 100 gals and 75 gals in 2014. This translated into a decrease in the total VOC emissions, from 1,680 pounds (0.84 tons) in 2013 to 1,257 pounds (0.63 tons) in 2014. It is clear that the VOC emissions significantly below the permit limits.

Natural gas usage in the gas-fired parts dryers was under 0.9 MMCF for both years. The emissions of pollutants (CO, NOx, PM, and SO2) generated from burning less than 1 MMCF are insignificant.

FINAL COMPLIANCE DETERMINATION

As a result of the site visit and based on the information provided by Mr. Kafarski in his letter dated March 30, 2015, all production operations at Chemical Processing Inc., located at 5485 Concord Ave., Detroit, MI 48211 ceased as of December 31, 2014. Therefore, AQD Detroit Office will be submitting a request to AQD - Permit Section to void all the active permits regulating the source identified with the State Registration Number (SRN) B5785. In addition, an email notification has been sent to Mr. Bruce Karfaski on July 30, 2015 asking him for his concurrence with our determination of voiding the permits. Once we receive an agreement notification from Mr. Karfaski concurring with this AQD action, the file will be considered inactive.

In conclusion, since the facility appeared to have ceased its operations when the site inspection was conducted and there isn't any equipment generating air pollutants, we considered the source to be in compliance with the requirements of the Federal Clean Air Act; Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451) and the State of Michigan AQD administrative rules.

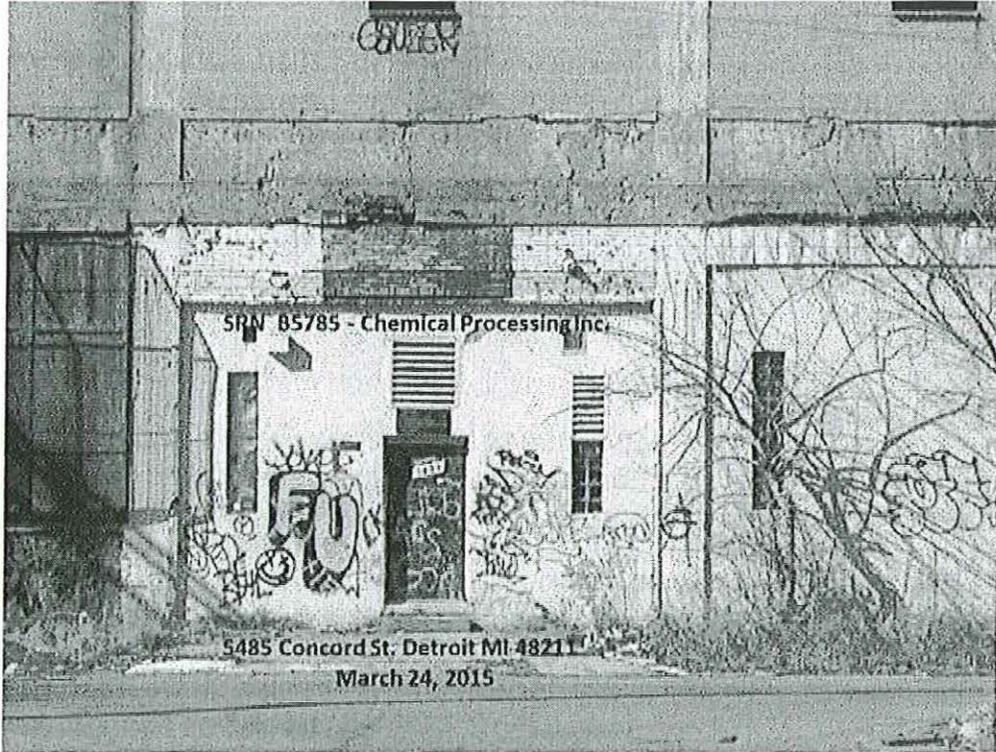


Image 1(SRN B5785) : Chemical Processing, Inc. Front Door - Facility ceased operations on 12/31/14

NAME Chandoval

DATE 8/3/15

SUPERVISOR JK