

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

H609243551

FACILITY: UNIVAR USA INC. - ROMULUS BRANCH		SRN / ID: H6092
LOCATION: 13395 HURON RIVER DR, ROMULUS		DISTRICT: Detroit
CITY: ROMULUS		COUNTY: WAYNE
CONTACT: Dave Cody , Plant Manager		ACTIVITY DATE: 03/09/2018
STAFF: Katherine Koster	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: FY2018 Targeted Inspection		
RESOLVED COMPLAINTS:		

REASON FOR INSPECTION: Targeted Inspection
INSPECTED BY: Katie Koster, AQD
PERSONNEL PRESENT: Dave Cody, Plant Superintendent; Shamille Goins, Regional Regulatory Manager
FACILITY PHONE NUMBER: 734-941-8235
FACILITY FAX NUMBER: 734-941-7140

FACILITY BACKGROUND

UNIVAR Corp. (formerly known as Chemcentral) is a chemical blending, repackaging, and distribution facility. The facility does not produce or manufacture chemicals; rather, it receives chemicals from manufacturers for distribution to other companies. Most of the products repackaged and blended are liquids in the form of paints, inks, and adhesives. Some solid chemicals are repackaged too; although this accounts for only a small percentage of the business. The corporate headquarters are in Seattle. The Romulus facility operates from approximately 5 a.m. to 9:30 p.m., Monday through Friday, and has been at this location for the last 40 years. Chemcentral was purchased by UNIVAR in 2007. Annual throughput for the tank farm for 2017 was 3,224,600 gallons. In 2016 it was 2,442,480.

COMPLAINT/COMPLIANCE HISTORY

The last inspection of this facility was conducted in 2014. Facility was determined to be in compliance at that time.

OUTSTANDING CONSENT ORDERS

Facility is no longer operating under any state consent orders.

INSPECTION NARRATIVE

On March 9, 2018, AQD inspector Katie Koster conducted a targeted inspection. I arrived at approximately 9:30 a.m., and I did not detect any odors or observe any fugitive emissions from the facility upon arrival. Note, safety glasses, boots, and hard hat are required.

At the facility, I met with Mr. Dave Cody, Plant Superintendent, and Ms. Shamille Goins, Regional Regulatory Manager. We started the inspection in the conference room. Mr. Cody stated that there have not been any changes to the facility, no big swings in production, and no generators have been installed on site. We briefly discussed federal regulations related to generators.

Solvent is generally received by tanker; however, there are many “pass through” materials received in drums and totes by truck. The facility also receives methanol via railcar; on average of one per month. Upon delivery, bulk product is analyzed and either pumped into one of 14 aboveground compartmentalized storage tanks (“Tank Farm”) or decanted into a portable tank or 55-gallon drum. All 14 storage tanks are horizontal (10’ x 46’) and each tank is divided into three to five fixed compartments for a total of 68 compartments. Compartment sizes range from 3,000 to 10,000 gallons each. About half of the tank compartments are solvent. Tanks are equipped with automatic shut off if the fill level exceeds 95% of the tank capacity. Each compartment has its own dedicated line and pump. Blend tanks are also in use for certain products. Blend tanks are located outside near the loading rack. The remainder of facility is storage.

First, we walked through a portion of the warehouse to get to the tank farm. The “pass through” storage area is not temperature controlled. Other storage areas are food grade, flammables, solvents, and oxidizers.

We walked outside and observed the tank farm which was installed in 1997 to replace the underground storage tanks. The tanks are contained in a concrete pit for spill protection and appeared to be in good condition. We proceeded to the loading rack. Product is pumped from the tanker to the storage tank. There are now 3 bays for loading, as opposed to 4, as one bay has been converted to fall protection equipment. There is also a rail spur for railcar unloading. I observed the three blend tanks in this area as well; they appeared to be in average condition.

We viewed three drum filling lines, one tote line, and one canning line in the warehouse. Emissions exhaust uncontrolled to a single stack. They are all automatic submerged fill. The stack is listed in the permit. However, I could not see the stack from ground level.

The facility recently installed two remediation units which are each operating under the Rule 290 exemption; a biological wastewater treatment system (WWT) for treating extracted groundwater in above-grade tanks, and a soil vapor extraction (SVE) system to remove volatile organic compounds (VOCs) from unsaturated soil at the site. We viewed both units. The WWT equipment is inside the warehouse in the east dock area. It works by utilizing solvent eating bugs. The SVE system is outside. Activated carbon is used for VOC control. We walked past the former site of the Aqua Detox Unit. It has been removed and replaced by the WWT system, which according to Mr. Cody, was approved by Beth Vens, DEQ. The soil vapor extraction unit generates about 1 drum of waste per quarter.

I concluded the inspection in a conference room where we discussed recordkeeping, and I stated that I would be following up via email with a records request.

APPLICABLE RULES/PERMIT CONDITIONS

Permits 160-97, 57-03, and 27-02 have been voided. Opt Out permit 118-06 was approved on July 11, 2006. The following is a list of the special conditions that were reviewed for compliance (they are paraphrased for brevity):

EU-CONT-FILL – Container filling operations (chemicals stored at the facility are loaded in to five gallon cans, 55 gallon drums, portable tanks, and bulk transports for shipment offsite).

1.1a IN COMPLIANCE. VOC emissions are limited to 10.5 tons per 12 month rolling time period. According to the report entitled UNIVAR Emissions Inventory Report 4U Branch, March 2018, the container filling emissions were 0.601 tons for the 12 month rolling time period ending December 2017.

1.1b IN COMPLIANCE. Each HAP is limited to 8 tons per 12 month rolling time period. According to the UNIVAR Emissions Inventory Report 4U Branch, the total HAP emissions were approximately 0.611 for the 12 month rolling time period ending December 2017 for the entire facility. This indicates compliance with the individual limit.

1.1c IN COMPLIANCE. Total HAP's are limited to 10.5 tons per 12 month rolling time period. See above.

1.2 IN COMPLIANCE. Throughput of each air contaminant shall not exceed the limit calculated in Appendix A. In no case shall the throughput of any individual contaminant exceed 15,000,000 gallons per 12 month rolling time period. Based on information submitted (4U.Air.Monthly.Rolling Annual Truck Loading and Container Filling.04.26.2018), no material had a 12 month throughput greater than 15,000,000 gallons for the period ending in December 2017. The total throughput for container filling for all materials in 2017 was below 15,000,000 gallons. The following TAC's have more restrictive limits: 2-propoxy-1-propanol, dimethyl glutarate, dimethyl adipate, dimethyl succinate, methylene chloride, trichloroethylene, triethylamine. The referenced report does not have any throughput associated with these materials.

1.4 IN COMPLIANCE. Shall keep in a satisfactory manner records of allowed throughout for each TAC as determined according to Appendix A of the permit. Allowed throughput was calculated during the permit process. It is in the permit file. According to the company, no new products have been introduced so no new throughput calculations have been necessary.

1.5 IN COMPLIANCE. Shall keep monthly and 12 month rolling records of the throughput of each toxic air contaminant. Throughput of each product is tracked and if it is a VOC or HAP that information is listed in a separate column. Monthly throughput is contained in 4U Air Monthly Rolling Annual Truck Loading and Container Filling.04.26.18 documents. 12 month rolling throughput is in the 4U Rolling Annual Report for each month for 2017. Total 12 month rolling throughput for 2017 for container fill was 2,839,520 for 2017 and truck loading was 1,104,708 gallons. The sum of these is less than 15,000,000 gallons.

The following have more restrictive limits than 15,000,000 gallons: 2-propoxy-1-propanol, dimethyl glutarate, dimethyl adipate, dimethyl succinate, methylene chloride, trichloroethylene, triethylamine. A review of the 2017 and 2018 data in the 4U Air Monthly Rolling Annual Truck Loading and Container Filling 04.26.18 spreadsheet did not indicate any throughput of these materials.

1.6 IN COMPLIANCE. Monthly and 12-month rolling VOC and HAP calcs are maintained. 4U.Air.Monthly.Rolling Annual Truck Loading and Container Filling.04.26.18 contains this information. However, it has to be summed (container filling and truck loading) to reflect total emissions from the emission unit.

1.7a – IN COMPLIANCE. 28 feet above ground level, exhaust unobstructed vertically upwards. Facility initially provided information that the stack was 27 feet above ground level. The company re-measured and determined that stack to be 28 feet. See attached email.

EUTANKFARM – 14 above ground storage tanks

2.1 IN COMPLIANCE. VOC emissions from EUTANKFARM shall not exceed 3.45 tons per 12 month rolling time period. UNIVAR Emissions Inventory Report 4U Branch, March 2018 shows emissions of 1.12 tons from the tank farm for the 12 month rolling period ending in December 2017.

2.2 UNKNOWN. Product transfer rate into EUTANKFARM shall not exceed 211 gallons per minute. According to facility personnel, the pumping rate cannot exceed 100 gallons per minute. However, awaiting further explanation on whether more than 2 pumps can operate at a time.

2.3 IN COMPLIANCE. Shall comply with all applicable provisions of NSPS Subpart Kb. Tank dimensions, capacity, and product stored record is maintained. See prior inspection records and attached.

2.4 IN COMPLIANCE. Shall not operate any compartment of EUTANKFARM unless pressure/vacuum vent installed and operating properly. Tanks are equipped with shut off valves, conservation vents, and flame arrestors. According to facility, tanks were recently inspected by DEQ.

2.6 IN COMPLIANCE. Monthly records of throughput in the EUTANKFARM. See attached (4U Air.Rolling.Annual TOTALS.04.26.2018).

2.7 IN COMPLIANCE. VOC emissions rate from the TANKFARM on a monthly and 12 month rolling time period. See attached (4U Air Tank Summaries).

FGBLENDTANKS – 3 above ground blend tanks

3.1 – IN COMPLIANCE. Shall not use hexsolv in FGBLENDTANKS without prior notification to and approval by the AQD. Plant manager stated no hexsolv has been used. Records also indicate no hexsolv has been used,

3.3 – IN COMPLIANCE. Shall not produce more than the following amount of each product per year (gallons). Throughput information for 2012 and 2013 and 2017 is below (from UNIVAR Emissions Inventory Report 4U Branch, March 2018)

Product	Limit	2012 throughput	2013 throughput	2017
DT 885	25095	0	0	0
H-100	14300	0	0	3,073
Parcosol 131R	344232	0	0	0
Parcosol EC-6	46805	0	0	0

Parcosol T46537	1603	0	0	0
Polypurge 6773	89925	0	0	0
Polypurge OH	124235	46,475	40,249	15,661
T-9273	39600	651	8402	2,621

3.4 – IN COMPLIANCE. Shall keep records of the amount of product produced. Records for 2017 were requested and provided. See UNIVAR Emissions Inventory Report 4U Branch, Romulus Michigan, March 2018.

FGFACILITY

4.1a IN COMPLIANCE. VOC limit of 20 tons per 12 month rolling time period. UNIVAR Emissions Inventory Report 4U Branch, March 2018 listed facility wide VOC emissions are 1.753 tons for 12 month rolling period ending in December 2017.

4.1b and c. IN COMPLIANCE. HAP limit of less than 9 tons for a single HAP and less than 22.5 tons for all HAPS. UNIVAR Emissions Inventory Report 4U Branch, March 2018 listed facility wide HAP emissions are 0.897 tons for 12 month rolling period ending in December 2017.

4.3 PENDING. Monthly and 12 month rolling facility wide HAP and VOC calcs. Monthly information exists but does not appear to be summed together; it is maintained separately for truck loading and container filling and tanks. Annual 2017 facility wide values are listed in 2017 4U Annual Report. Facility is in the process of improving record keeping database, reports, and format.

Note: Overall records are very cumbersome and difficult to follow. Facility and AQD cannot easily determine compliance status. A separate file with multiple page spreadsheets exists for each 12 month rolling period. A summarized view needs to be created for quick assessment of the compliance status for the facility environmental personnel.

EXEMPT EQUIPMENT

WWT and SVE unit are operating under the Rule 290 exemption. Facility combined emissions from both units into one Rule 290 exemption. See attached.

AREA SOURCE MACTS and NSPS

As facility is not manufacturing any chemicals or coatings, it does not appear to be subject to area source MACT VVVVVV – Chemical Manufacturing Area Sources.

NSPS Kb – Applicable conditions are incorporated into the permit.

APPLICABLE FUGITIVE DUST CONTROL PLAN CONDITIONS:

N/A. All lots are paved.

MAERS REPORT REVIEW:

2017 MAERS was not submitted on time. Facility attributed this to a change in consulting company. Facility received a dunning letter but submitted the MAERS report before a VN was issued.

FINAL COMPLIANCE DETERMINATION:

At this time, facility appears to be in compliance with conditions that were evaluated in this report.

In general, emissions appear to be well below permitted limits However, the records are very difficult to follow. The company is in the process of revamping reports and compliance information. I will follow up with the company to see if recordkeeping format has been improved in about 6 months. At that time, I will re-evaluate compliance with a satisfactory manner and whether a VN is needed. At a minimum, a

summary view needs to be created to that 20+ files do not have to be opened to evaluate compliance over a single year period.

NAME Kaluzise

DATE 3/15/18

SUPERVISOR W.M