

N0246
MANILA

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

N024632490

FACILITY: HD INDUSTRIES		SRN / ID: N0246
LOCATION: 19455 GLENDALE, DETROIT		DISTRICT: Detroit
CITY: DETROIT		COUNTY: WAYNE
CONTACT:		ACTIVITY DATE: 11/06/2015
STAFF: Stephen Weis	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MAJOR
SUBJECT: Compliance inspection of the HD Industries facility. HD Industries is scheduled for inspection in FY 2016.		
RESOLVED COMPLAINTS:		

Location:

HD Industries, Inc. (SRN N0246)
19455 Glendale
Detroit

Date of Activity:

Friday, November 6, 2015 is the initial activity date, with several follow-up dates as described in the report.

Personnel Present:

Steve Weis, DEQ-AQD Detroit Office

Purpose of Activity

A self-initiated inspection of the HD Industries facility (hereinafter "HD") was initiated on Friday, November 6, 2015. The HD facility is on my list of sources targeted for an inspection during FY 2016. The purpose of this inspection was to determine compliance of operations at the HD facility with applicable rules, regulations 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. 242-06C, which was issued on May 31, 2013, as well as enforcement and court orders.

Facility Description

The HD facility is located on the south side of Glendale St. between Auburn and Westwood Streets. The area bounded by Evergreen Road on the west, the Southfield Freeway on the east, Interstate 96 to the south and West Davison Street to the north contains a mix of commercial and industrial properties. The area between West Davison and Schoolcraft Rd. is residential, and the closest residential property is located approximately 320 yards (less than 1/5 mile) from the HD facility.

The facility consists of a single building with a warehouse/processing area in the back portion of the building, and an open lot behind the building.

Facility Operations

HD operated a secondary aluminum recovery process at the facility. This process consisted of a natural gas-fired rotating barrel furnace that was used to melt aluminum dross material to recover residual aluminum from the dross. Dross is a byproduct produced during the aluminum smelting process; the dross is the impurities that are driven to and float on the surface of molten aluminum via a fluxing agent, which are skimmed off. Some of the dross is further processed via a thermal secondary recovery process through which the dross is melted, and residual aluminum is recovered. According to past inspection reports, HD received all of the aluminum dross that they processed from the Fritz Products facility in River Rouge, MI.

The HD facility was still operating in the autumn of 2014. An order from the Ingham County Circuit Court dated August 5, 2014 required that HD immediately cease operation of the gas-fired dross furnace, and prohibited HD from operating their secondary aluminum recovery process until authorized to do so by the Court. HD continued to operate after August 5; DEQ-AQD staff noted several occasions when it was apparent that the facility was

operating between August and early December 2014. It does not appear that HD has operated since December 2014.

Inspection Narrative

The primary purpose of my inspection was to determine whether HD has any presence at the facility on Glendale, and to determine whether the natural gas-fired furnace is still on site and capable of operating. I had driven by the HD facility on a regular basis since March 2015 as part of surveillance of a neighboring business, Kamp's Pallets, due to some complaints in the area. On these occasions, I never observed any activity at HD.

I made several visits to the facility as part of this compliance inspection. These visits are summarized below.

November 6, 2015 – I initiated the compliance determination for the HD facility by visiting the site on this date. I arrived at about 11:15am. I did not observe any activity at the site. I walked around the front of the building, and walked up the driveway on the east side of the building that leads to the rear of the property. I did observe a pile of tires that had been dumped alongside the driveway, up against the building. I observed even more tires in the lot behind the building, along with what appeared to be pieces of the ductwork and a portion of the baghouse, and other metal. I also noted a pile of a fine material that looked like dross/byproduct from the aluminum furnace; this material was also present in smaller quantities on other portions of the back lot. I took some pictures of the building, along with the tires and metal, and I forwarded them to staff with DEQ's Office of Waste Management and Radiological Protection (OWMRP) for their follow-up with the dumping.

January 26, 2016 – I visited the site as part of a multi-media inspection with staff from DEQ-OWMRP. Ann Vogen, Alexandra Clark and I arrived at the facility just after noon. There was no sign of activity at the site. We drove up the side driveway to the rear of the building. The building, itself was secure, and there was no way to look inside to check whether the furnaces are still inside the building. OWMRP staff noted the amount of tires at the site, as well as the fine material on the ground and the scrap metal. They planned to contact the City of Detroit DPW regarding the accumulated tires, and to check if they can help in accessing the building.

February 2016 - In the time after the January 26 visit, I drove by the facility and I noticed a vehicle parked in front of the building on a couple of occasions in February. I noted the license plate on the vehicle, and I checked the Motor City Mapping website to see if the person or parties listed as the property owner had changed. The website indicated that Danuta Zborowska was the owner; this was the case when HD was operating at the site. I contacted Det. Erick Thorson of DEQ's Environmental Investigation Section on February 23 to inquire if he could check the license plate to see if the vehicle is registered with any of the past owners of HD (Zborowska or Henry Kijanka). He replied that the vehicle was not registered to either one of them. On February 26, I received an e-mail informing me that Joe DeGrazia of DEQ's Remediation and Redevelopment Division (RRD) had received an inquiry from the Detroit Fire Department regarding the facility. I replied to Joe later that day; a copy of the e-mail exchange is attached to this report. Joe, Ann and I decided to try and perform a joint inspection of the site sometime in March, and to try and gain access to the inside of the building.

March 2016 – Ann Vogen of OWMRP received a response to an inquiry that she made regarding the tires through which she found the new owner of the property, Derrick Gergis. See the attached e-mail regarding the new owner, and his stated intentions for the property.

April 27, 2016 – I received a phone call from Gordon Mahrly of Dry Ice Works (www.dryiceworks.com). According to Gordon, the new owner of the building wants the ceilings renovated; this would involve removing rust and corrosion from the support trusses. Dry Ice Works utilizes dry ice to remove rust and paint. Gordon was concerned about the building based on information that he came across relating to the operations of H Industries. He wanted to make sure that any work that he may do in renovating the ceiling is compliant with environmental regulations.

I advised Gordon that from an AQD perspective, the key is ensuring that any dust generated by the dry ice blasting process is contained within the building, and does not escape to the ambient air. I also mentioned EPA's Lead Abatement Training and Certification Program, and Gordon indicated that his company was familiar with this program and its requirements.

From the perspective of other media, I provided Gordon with contact information for Jim Day of DEQ's OWMRP and Joe DeGrazia of DEQ's RRD. I advised Gordon to contact them to discuss the removal and disposal of any waste generated by the cleaning and renovation process. Gordon agreed to do so.

I drove by the facility periodically in the days after our conversation, and I did not observe any activity at the site.

May 11, 2016 – I drove by the HD facility, and I observed that some major renovation/demolition work was in progress on the building. I took some photos, some of which are attached to this report. I called Derrick Gergis, and spoke with him regarding the building. Derrick told me that he is stripping down much of the building, as much of it turned out to be in bad shape. Among his plans are taking down the metal sided walls, and having new masonry walls put up in their place. He is hoping to be able to re-purpose the building as a warehouse. Derrick told me that the furnace was being removed from the building and hauled away for scrapping that afternoon. I sent Derrick an e-mail requesting that he respond with a statement that the furnaces at the site had been removed, and how they were removed. My e-mail and Derrick's response are attached to this report.

I returned to the site at around 4pm, and when I arrived, the furnace was sitting on a flat-bed trailer, about to be hauled away. I took a couple of pictures of the furnace, and of the building. I spoke with a couple of the contractors at the site, and I inquired whether anyone involved with the work on the building had performed an asbestos survey, or submitted notification to DEQ-AQD. They were unaware of the regulations. I informed Asbestos Program staff in the AQD-Detroit Office of this project. On May 13, I received notice that Asbestos Program staff had visited the site, and taken some samples of materials suspected of containing asbestos. A "Notification of Intent to Renovate/Demolish" was submitted to DEQ with a notification date of May 23, 2016. Asbestos Program staff issued a Violation Notice dated June 30, 2016 based on the findings of their investigation. A copy of the notification and Violation Notice are attached to this report for reference.

Permits/Orders/Other

Prior to their ceasing, as it related to DEQ-AQD, the operations and processes at the HD facility were subject to a permit, a Federal regulation, and a DEQ-AQD Consent Order.

The last AQD Permit to Install that was issued to the facility, PTI No. 242-06C, was issued on May 31, 2013. This permit addressed the operation of the natural gas-fired rotating barrel furnace, which was designated in the permit as EUDROSSFURNACE.

The furnace was subject to the requirements of 40 CFR Part 63, Subpart RRR (National Emission Standards for Hazardous Air Pollutants for Secondary Aluminum Production).

HD entered into Consent Order AQD No 7-2008 on March 24, 2008.

These documents and regulations no longer apply to the site at 19455 Glendale, as the HD facility has permanently ceased operation.

Compliance Determination

Based upon the information gathered via the various site visits, communications and follow-ups related to the HD facility, it is determined that HD Industries, Inc. has permanently ceased operations at 19455 Glendale. All of the process equipment associated with HD has been permanently removed from the site. The property has a new owner, and the building is proposed to be used for storage and warehousing. As mentioned in the last section, all of the DEQ-AQD documents and regulations related to the operations at the now former HD are no longer active. The only outstanding air quality-related issue is the asbestos violation, which will be addressed by DEQ-AQD's Asbestos Program staff.

NAME

Steve Weis

DATE

7/20/16

SUPERVISOR

JK