

N1105
MANILA

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

N110549223

FACILITY: DHAKE INDUSTRIES		SRN / ID: N1105
LOCATION: 15169 NORTHVILLE RD, PLYMOUTH		DISTRICT: Detroit
CITY: PLYMOUTH		COUNTY: WAYNE
CONTACT: B.G. Dhake , President		ACTIVITY DATE: 06/18/2019
STAFF: Jill Zimmerman	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: Inspection resulting from odor complaints		
RESOLVED COMPLAINTS: C-19-00892, C-19-01615, C-19-01686, C-19-01706, C-19-01725		

DATE OF INSPECTION : 06/18/2019
 TIME OF INSPECTION : 10:45 am
 NAICS CODE : 325510
 INSPECTED BY : Jill Zimmerman
 PERSONNEL PRESENT : B.G. Dhake, President and CEO
 FACILITY PHONE NUMBER : 734-420-0101
 FACILITY EMAIL : adhake@dhakeindustries.com

FACILITY BACKGROUND

Dhake Industries is a paint mixing facility. A true minor source, the facility operates one shift per day, five days per week, about 37.5 hours per week. The facility was last inspected on January 20, 2017. The facility mixes paint in one of seven portable mixers or four stationary mixers. The facility operates 7:30 am through 4:00 pm Monday through Friday. An automated measuring line for adding the paint ingredients has been installed since the last inspection. The facility manufactures both solvent based and water-based paint. Approximately 54% of the paint produced is shipped internationally to countries such as Canada, China, Mexico and India.

PPE REQUIRED

During the onsite inspection, I wore steel toed shoes and safety glasses.

COMPLAINT/COMPLIANCE HISTORY

Recently, odor complaints have been received regarding this facility. Odor surveillance has been preformed in the area, though odors have not been verified. No odors were detected outside of the building during the onsite inspection. The bay door, which is located on the southwest corner of the facility, is typically opened. This area of the facility is used for storing the final product in closed containers, and was opened during the onsite inspection.

PROCESS EQUIPMENT AND CONTROLS

Dhake Industries operates seven portable paint mixers and four stationary mixers, all contained in a paint mixing room in the facility. The water-based paints contain less than 1% VOCs, and the solvents based paint contains 3.2% VOCs. The paint ingredients are placed in the paint mixer container to begin this batch process. The ingredients are then mixed together to form the final product. The facility completes approximately three batches per day or 1,000 to 1,500 gallons per week. During the mixing, a cover is placed on the paint mixer to contain VOCs. When the containers are not being used to mix the product, they are covered to keep dirt and debris from setting into the container. When the paint is finished mixing, a plastic cover, like a shower cap, is placed over the container until the paint is placed in the final container. Paint is sold in 1 gallon, 5 gallon and 55-gallon containers.

INSPECTION NARRATIVE

As I was walking into the facility, I did not detect paint odors outside of the facility. I also observed people in the direct area running or biking past the facility.

This unannounced inspection began with a pre-inspection meeting with Mr. B.G. Dhake, where I explained the purpose of the inspection. Mr. Dhake explained that no changes had been made to the process since the last time that this facility was inspected on January 20, 2017. The paint product is made as needed, so there is not extra product stored onsite.

After the pre-inspection meeting, Mr. Dhake escorted me through the facility. One batch of paint was being mixed. The other mixing vessels in the mixing room were covered. The vessels are covered when not being used to keep dirt and debris out of the vessels.

Next, we walked through a storage area where empty containers are stored. All containers that are to be used for mixing are stored with the shower cap covering inside the container so that when product is added, the cover is readily available. All used containers are sent to a facility to be recycled. Paint is only stored in new containers. All waste drums were covered and properly labeled.

The facility operates a quality lab to determine that the paint product meets the quality standards. A small sample of paint from each batch is sprayed on a metal test piece to check for quality standards, such as color, and thickness. The paint is sprayed in a small paint booth. Records for each test spray are maintained onsite and were reviewed during the onsite inspection. Filters were present in the paint spray booth. The facility uses about 1 or 2 gallons of paint per month in this booth.

APPLICABLE RULES/PERMIT CONDITIONS

Currently Dhake Industries operates under two Wayne County Permits to install. Permit C-7125 allows the installation of a paint mix room exhaust system for 4 paint mixers and was issued on 12/11/1985. Permit C-7984 allows the installation of a paint mixer / high speed dispersion mill and was issued on 2/17/1988.

The special conditions for C-7125 are:

16. COMPLIANCE – Facility cannot produce more than 200,000 gallons of paint per year. Mr. Dhake stated that the facility produces 10,000 gallons to 15,000 gallons of paint per year. Mr. Dhake said that production was down by approximately 40% during the past two years but has been starting to increase again lately.
17. COMPLIANCE – Based on the production of 15,000 gallons of paint produced and the maximum VOC content of the paint as 3.2%, the facility emitted about 0.04 tons of VOC in the last year which is less than the limited 9.71 tons per year.
18. COMPLIANCE – The facility is operating 7.5 hours per day, 5 days per week, which converts to 1950 hours, which is less than the limited 2000 hours annually.
19. COMPLIANCE – All paints must be covered. All paints were covered during the onsite inspection.
20. COMPLIANCE – All solvent must be stored covered. All raw materials were stored covered in a storage room.
21. COMPLIANCE – The minimum stack height is 24 feet, the roof of the building is at least 30 feet, and the stack is taller than the roof.
22. UNDETERMINED – During the past year, paint odor complaints have been

received. These odors have not been verified. Odor surveillance will continue in the area to determine the source of the odor complaints.

The special conditions for C-7984 are:

16. COMPLIANCE – No VE's were seen coming from the mixer during the onsite inspection. One batch was being mixed and a second batch was about to be mixed during the onsite inspection.
17. COMPLIANCE – Only one mixer was being used during the onsite inspection. A second mixer as being prepared to be used. The remaining 3 mixers were not being used.
18. COMPLIANCE – All conditions of Wayne County Permit C-7125 were in compliance during the onsite inspection. Recent odor complaints have not been verified. Surveillance in the area will continue in an effort to verify the source of the odors.

MAERS REPORT REVIEW

NA

FINAL COMPLIANCE DETERMINATION

Dhake Industries appears to be operating in compliance with all state and federal regulations, as well as all permit conditions as of the onsite inspection on June 18, 2019. Odor surveillance will continue in response to the odor complaints.

NAME *Jill Zimmer* DATE 10/8/19 SUPERVISOR JK