

N1105
MANILA

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

N110554904

FACILITY: DHAKE INDUSTRIES		SRN / ID: N1105
LOCATION: 15169 NORTHVILLE RD, PLYMOUTH		DISTRICT: Detroit
CITY: PLYMOUTH		COUNTY: WAYNE
CONTACT:		ACTIVITY DATE: 08/12/2020
STAFF: Jill Zimmerman	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT:		
RESOLVED COMPLAINTS:		

DATE OF INSPECTION : 08/12/2020
 TIME OF INSPECTION : 12:15 pm
 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 June 18, 2019. 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

The most recent complaint received for this facility was July 2, 2019.

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 solvent-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 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

On May 14, 2020, I contacted Arjun Dhake, VP of Business Development regarding the operations at the facility. Mr. Dhake stated at the time that the facility was shut down due to the COVID 19 pandemic and the stay home orders imposed to stop the spread of the virus. Mr. Dhake stated that the facility planned to slowly reopened as their customers began to reopen, but that based on business projections, demand would remain low.

On August 12, 2020, I performed odor surveillance in the area of the facility. During this activity, I did not detect any odors.

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:

1. 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 during a typical operating year. Because the facility was shut down during a portion of 2020, production was lower than a typical year.
2. COMPLIANCE – Based on the production of 15,000 gallons of paint produced, and the EPA emission factors from MAERS, the facility emitted about 0.04 tons of VOC in the last year which is less than the limited 9.71 tons per year.
3. COMPLIANCE – The facility typically operates 7.5 hours per day, 5 days per week, which converts to 1950 hours, which is less than the limited 2000 hours annually. Because of the government imposed shutdown, this number will be lower than a typical year.
4. COMPLIANCE – All paints must be covered.
5. COMPLIANCE – All solvent must be stored covered. All raw materials were stored covered in a storage room.
6. 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.
7. Compliance – During the past year, one paint odor complaint has been received. No odors were detected during surveillance in the area in August 2020. Odor surveillance will continue in the area to determine the source of the odor complaints.

The special conditions for C-7984 are:

1. COMPLIANCE – No VE's were seen coming from the mixer during the onsite inspection.
2. COMPLIANCE – During between March 2020 and at least May 2020 the entire plant was shutdown.
3. COMPLIANCE – All conditions of Wayne County Permit C-7125 were in compliance during the onsite inspection.

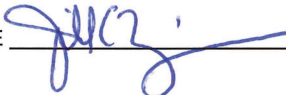
The number of mixers at the facility does not match the number of mixers listed in the permits. Further investigation will continue to verify which mixers are associated with which permits.

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 August 12, 2020. Odor surveillance will continue in response to the odor complaints.

NAME 

DATE 7/8/2022

SUPERVISOR JK