DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: Site Review

B171543891

FACILITY: Industrial Container Services - MI, LLC		**SRN / ID:** B1715
LOCATION: 4336 HANSEN ST SW, GRAND RAPIDS		**DISTRICT:** Grand Rapids
CITY: GRAND RAPIDS		**COUNTY:** KENT
CONTACT: Brent Robinson , Facility Manager		**ACTIVITY DATE:** 03/29/2018
STAFF: April Lazzaro	**COMPLIANCE STATUS:** Compliance	**SOURCE CLASS:** SM OPT OUT
SUBJECT: Heavy black smoke observed from drum furnace, see file for disk with video recording.		
RESOLVED COMPLAINTS:		

At about 3:25 PM, I was driving northbound on US 131 when I saw heavy black smoke at the 44th St. exit. I took the exit and headed east and determined the smoke appeared to be originating from Industrial Container Services. I began to film the heavy black smoke which was at 100% opacity. The video of this smoke is on a disk along with a hard copy of this report in the file. As I pulled into the parking lot to observe the black smoke, I could see that the operator continued to load barrels into the furnace, even though there was clearly a problem. I used the video to read the opacity and came up with a 6-minute average of 18%. I did not include the approximately 2 minutes of heavy black smoke that I observed from the highway to the point where I began recording in my determination.

I did not have safety gear or I would have gone on-site, so instead I called and asked for Dan Belfer. I learned that Mr. Belfer no longer worked for the company and I spoke with Kyle. I told Kyle about the problem, which by then had discontinued. He said he'd inform the operator, but that I'd want to call back in the morning and talk to Brent because he was in charge.

I called the next morning before 8:00 and spoke with Brent Robinson, Facility Manager. He told me that a thermal couple had gone out and they had stopped running and replaced it. I told him that I observed the operator continue to feed barrels into the furnace, so that did not seem to be true.

I asked him to send me afterburner temperature records and the actions taken for March 29th. He asked if he could do it Monday, since he had a short day and would be traveling over the weekend and I agreed. The report did not come on Monday, so I called Tuesday Morning and he said he would get it to me. Included is a picture of the temperature chart for the 28th and 29th, as well as a photo of the opacity chart which confirms my observations.

During a phone review of the furnace and afterburner temperature charts, Mr. Robinson described how on both March 25 and 26, there were some temperature swings noted. Looking back on the data, this is an indicator that the thermocouple is failing.

Due to the fact that these temperature swings are an indicator of thermocouple failure, I requested that this scenario be added to the Malfunction Abatement Plan (MAP). Specifically, we identified that this should be added under "Condition" and "Action" on pg. 10. The condition is an unexplained temperature swing of afterburner temperature, but they need to describe it in a manner that the operator of the furnace will understand and take action on. The action is to inspect the thermocouple and replace it, so that complete failure does not occur. Industrial Container Services will add this to the MAP and resubmit it ASAP.

I also talked with Mr. Robinson about accountability, and how the expectation of the AQD is that the company employees will follow the new protocol to try and keep this from happening again. This requires education of facility staff of the requirements of the MAP. The company will also need to ensure that they document the actions taken as required in the MAP.

Mr. Robinson stated that they will get it done, and do what is necessary to avoid future issues.

Brian Grannan out of the company's Ohio facility was copied on some correspondence because he wrote the current MAP and I wanted him to be involved in updating the document as well as ensuring accountability for the Grand Rapids facility.

NAME [signature] DATE 4-4-18 SUPERVISOR [signature]