

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

N166444746

FACILITY: KAMPS PALLETS, INC		SRN / ID: N1664
LOCATION: 2900 PEACH RIDGE NW, GRAND RAPIDS		DISTRICT: Grand Rapids
CITY: GRAND RAPIDS		COUNTY: KENT
CONTACT: Nate VanEck , General Manager		ACTIVITY DATE: 06/14/2018
STAFF: Adam Shaffer	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: Scheduled unannounced inspection.		
RESOLVED COMPLAINTS:		

Air Quality Division (AQD) staff Adam Shaffer (AS) arrived at the facility at 2:20 pm on June 14, 2018 to complete a scheduled, unannounced inspection. The weather conditions were partly cloudy, winds from west at 5-10mph, and low 80's°F.

Facility Description

Kamps Pallets, Inc. (KP) is a pallet reconstruction and mulch producing facility. The company does not operate with a permit, but instead utilizes exemptions for all on site processes.

Compliance Evaluation

Prior to entering the facility, offsite visible emissions and odor observations were completed from areas to the north, east and west. Wood odors were identified to the north and east; however, no odor complaints have been recently received from surrounding properties. While observing mulching operations on the eastern portions of the site, fugitive dust could be seen blowing around the site. This will be discussed further below in the inspection report.

Upon entering the facility, AQD staff AS met with Mr. Tim Coole, Manager, who provided a tour of the facility and provided answers to site specific operations. Phone conversations were completed with Mr. Nate Vaneck, Regional Manager, following the site inspection regarding remaining site-specific questions.

- **Office Building** – This building is located along the southwestern portions of the site and consisted of offices and the front desk.
- **Building A** – This is the dispatch office and is located along the western portions of the site.
- **Building B** – This is where cutting operations occur on site. Wood pallets are initially brought in from off site. The wood pallets and boards are then cut down to the desired product size. Approximately 22,000 boards are cut each day.
 - Ten cutting machines were observed in this building. Ceiling fans were observed throughout the building that keep emissions down during the cutting process. Additionally, one fan was located along the eastern wall that vents externally unobstructed. No significant amounts of dust or debris were observed adjacent to the fan leading outside. The ten cutting machines appear to be exempt per Rule 285(2)(l)(vi)(B). A conveyer belt was observed that takes scrap wood from cutting operations and loads it into a trailer that was observed adjacent to the building.
- **Building C** – This is the mechanic building where all forklift and trailer repairs are completed.
 - One above ground non-highway diesel fuel tank was observed adjacent to the building. The diesel tank appears to be exempt per Rule 284(2)(d).
 - One above ground used oil tank from the fork lifts on site was observed within the interiors of the building. The tank appears to be exempt per Rule 284(2)(c).
 - Various saws, machines, and a drill press were observed that appear to be exempt per Rule 285(2)(l)(vi)(B).
 - One parts washer was observed during the inspection. The parts washer is less than ten square feet and utilizes Ultra Solv 221 Red. A Material Safety Data Sheet was requested and provided for the material used, verifying a volatile organic compound (VOC) content of 95 percent. The

parts washer was not in use at the time of the inspection, but the lid was open. AQD staff AS reminded KP staff to keep the lid closed when not in operation. An operating procedure label was observed on the parts washer. Based on the size of the parts washer, it appears to be exempt per Rule 281(2)(h).

- **Building D** – This is the repair building where all pallets are reconstructed. Here pallets go through one of two processes. A “recon” process is where minor repairs to a pallet such as replacing a board are completed. A “reman” process is where a pallet is reconstructed from scratch.
- **Building E** – This is a storage building for pallets following the heat treating process in the wood drying heat-treating units.
 - Two wood drying heat-treating units were observed adjacent to the storage building. Here wood pallets are heat treated prior to being stored and shipped off site. Heat treatment of pallets is done in order to eliminate insect larvae and prevent a potential insect reinfestation. The wood drying heat-treating units are potentially subject to Rule 201. In the previous inspection, the one wood drying heat-treating unit on site at the time appeared to have been exempt from permitting per Rule 290. Based on records reviewed, conflicting emission factors appeared to have been previously used in determining emissions from heat treating operations. A Rule 278a request dated July 18, 2018 was sent to the company and a response was received on August 1, 2018. Also, a meeting between AQD staff AS and several KP staff was held on August 1, 2018, where the wood drying heat-treating units and calculating emissions were discussed at length. KP is using emission factors from the “EPA Region 10 HAP and VOC Emission Factors for Lumber Drying, December 2012” document and believes the two wood drying heat-treating units are exempt per Rule 290. Monthly production records and emission records were provided from July 2017 through June 2018. It should be noted that wood being processed that is of interest is green untreated wood. Most of the wood that is heat treated at the Grand Rapids KP site is recycled wood that would have already been treated. The emissions from previously treated wood appear to be negligible. Minor changes were noted, and the records were resubmitted. After review of the records, the use of Rule 290(2)(a)(ii) appears to be acceptable.
- **Mulch Operations** – Here scrap pallets that are not reconstructed are instead ground into mulch.
 - Two mulch pickup areas were observed throughout the facility. KP staff stated that the mulch pickup area located adjacent to Building E is for smaller jobs (less than six yards). The larger mulch pickup area is located in the eastern portions of the facility. Several large piles of scrap pallets, uncolored mulch and colored mulch were observed in the eastern portions of the site. During the walk through, site conditions observed were dry with fugitive dust observed being generated on site. AQD staff AS observed opacity emissions of 5-10% that appeared to be going off site to the wooded areas to the south. AQD staff AS spoke with Mr. VanEck, Regional Manager, regarding the fugitive emissions. According to KP staff, only the tub grinder machine used to break pallets into mulch has dust suppression. The tub grinder machine was not observed in operation at the time of the inspection. The grinding machine is equipped with a 2-inch water hose that sprays water into the mill to wet wood before and after grinding. No watering is completed for roadways or storage. In the future, KP shall implement more acceptable dust suppression practices in order to reduce fugitive emissions.
 - One above ground non-highway diesel fuel tank was observed. The diesel tank appears to be exempt per Rule 284(2)(d).
 - One color machine was in operation at the time of the inspection that is used to color mulch. Safety Data Sheets (SDS) were requested and provided for the colors used in the process which are red, dark red, dark walnut, coffee brown, espresso, gold and black. Additionally, information was requested and provided from the supplier stating no VOCs are in any of the materials used. However, upon review of the SDSs, hazardous air pollutant (HAP) components were identified in the coffee brown coloring used. A Rule 278a request, dated July 18, 2018 was submitted to the company for additional information which included information regarding the mulch coloring machine. A response was received on August 1, 2018. In the response, it was stated by KP that the coffee brown colorant in their mulch coloring process is no longer used at the Grand Rapids KP site. Based on this, it appears that there are no emissions generated from this piece of equipment.

Conclusion

Based on the facility walkthrough, observations made, and the records provided, KP appears to be in compliance with applicable air quality rules and regulations at this time.

NAME adam E. Shaffer

DATE 08/03/18

SUPERVISOR 