

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: On-site Inspection

N644262725

FACILITY: INDUSTRIAL STRIPPING SERVICE		SRN / ID: N6442
LOCATION: 2235 29TH ST SE, GRAND RAPIDS		DISTRICT: Grand Rapids
CITY: GRAND RAPIDS		COUNTY: KENT
CONTACT: Josh Zandstra , Plant Manager		ACTIVITY DATE: 04/27/2022
STAFF: April Lazzaro	COMPLIANCE STATUS: Non Compliance	SOURCE CLASS: MINOR
SUBJECT: Unannounced inspection in response to complaint of smoke and odors.		
RESOLVED COMPLAINTS: C-22-00703		

Staff, April Lazzaro arrived at the Industrial Stripping Services (ISS) facility to conduct an unannounced, self-initiated inspection in response to a complaint for smoke and odors originating at the facility. No odors or visible emissions (smoke) were identified upon approaching the facility. Staff met with Brian Stuitje since Josh Zandstra, Plant Manager was not immediately available. Mr. Stuitje did contact Mr. Zandstra to inform him I was there. I informed the company representatives that I was there to conduct an inspection in response to a complaint alleging smoke and odors at approximately 9:30 AM on the previous two days. Mr. Zandstra was available to join us for the closing conference that followed the on-site inspection.

Industrial Stripping Services, LLC operates nine rack burn-off ovens which are covered by two Permits to Install, No.'s 574-97 and 168-01. PTI No. 574-97 covers eight separate burn-off units (#1-8) and limits opacity to 20% and requires a minimum afterburner temperature of 1,400°F. There is no required recordkeeping in the PTI, however iSS maintains daily temperature records when in operation. The log that is maintained demonstrated compliance with the temperature requirements. Mr. Stuitje confirmed that the units are set up to ensure that the afterburner chamber achieves the 1,400°F temperature prior to the primary chamber initiation. This information is also maintained on the recordkeeping.

PTI No. 168-01 covers oven #9, which requires a minimum temperature of 1,400°F, as well as a recordkeeping component. It requires that the facility not process any coatings that contain polyvinyl chloride, Teflon, or other halogenated compounds in oven #9. Mr. Zandstra indicated that they do not process those materials in any of the ovens. The oven is equipped with a circular chart to record the temperature and is also reviewed in operation on the daily sheet used for the entire facility.

Status of ovens and afterburner temperatures observed during the inspection:

Oven 1: just being loaded (this oven will be replaced soon by New Oven 2)

Oven 2: not in operation (aka New Oven 1)

Oven 3: just being unloaded

Oven 4: just being unloaded

Oven 5: not in operation

Oven 6: 1,540°F

Oven 7: 1,600°F

Oven 8: 1,580°F

Oven 9: not in operation

Mr. Stuitje and Zandstra indicated a detailed knowledge of the operations of the ovens during the inspection and displayed an understanding that maintenance and unit upkeep is critical. Additionally, the stacks and roof is inspected and approximately five years ago, guy wires were

added for stack stability. Any stack replacement that has taken place was like for like in size following the prior stack height increases that took place. Oven temperature records were requested and reviewed for the days smoke was observed. All temperatures of the ovens and afterburners were within compliant ranges.

In the spring of 2021, the facility installed a new ECO burn-off oven without obtaining a Permit to Install. This is a violation of Rule 201, and a Violation Notice will be issued. A second oven has been ordered and will be delivered in June 2022. Based on the size of the new ovens, the General Permit to Install is not an option, and the company will need to apply for a regular Permit to Install. Since Industrial Stripping Services is a small business, they will be referred to Jenifer Dixon, EGLE Environmental Support Division for assistance with their application. The permit section will require Safety Data Sheets for coatings that will be processed in the ovens, and that information will be relayed to the company.

When a burn-off oven processes coatings or materials that contain polyvinyl chloride, Teflon or other halogenated organic compounds, combustion by products can contain Hazardous Air Pollutants (HAP), which are regulated by Michigan Law and the Federal Clean Air Act. During the inspection, it was discussed and confirmed that this facility does not process racks with coatings containing any of these materials. Therefore, as long as this remains the case, this source appears to be a minor source of HAP emissions.

A media blast operation is located in the southwest corner of the building, and visual observation of the area confirmed it is still internally vented. The residue in the ovens is cleaned out as necessary and appeared to be disposed of properly.

Industrial Stripping Services, LLC. was in non-compliance at the time of the inspection.

NAME 

DATE 5/3/22

SUPERVISOR 

Industrial
stripping
5/3/22

	DATE	START TIME	NOTES	OVEN TEMPS
OVEN 1	4/25/2022	8:20 PM		800/1600
	4/26/2022	3:30 PM		800/1600
	4/27/2022	11:00 AM		800/1600
	4/28/2022	12:00 PM		798/1589
	4/29/2022	2:45 PM		800/1600

OVEN 2	4/25/2022	12:00 PM		800/1600
	4/26/2022	8:00 AM		800/1609
	4/27/2022	6:30 AM		800/1603
	4/28/2022	2:00 PM		303/1493
	4/29/2022	8:00 PM		800/1609

OVEN 3	4/25/2022	5:55 PM		680/1615
	4/26/2022	12:20 PM		500/1624
	4/27/2022	9:30 AM		800/1609
	4/28/2022	8:30 AM		795/1523
	4/29/2022	9:00 AM		799/1601

OVEN 4	4/25/2022	11:50 AM		800/1613
	4/26/2022	12:20 PM		550/1612
	4/27/2022	10:10 AM		500/1609
	4/28/2022	8:30 AM		801/1599
	4/29/2022	19:55		800/1601

OVEN 5	4/25/2022	9:50 PM		800/1600
	4/26/2022	7:00 AM		800/1600
	4/27/2022	9:10 AM		800/1600
	4/28/2022	10:30 AM		799/1601
	4/29/2022	8:30 PM		800/1600

OVEN 6	4/25/2022	6:30 PM		552/1544
	4/26/2022	11:45 AM		343/1540
	4/27/2022	1:35 PM		140/1454
	4/28/2022	3:45 PM		689/1557
	4/29/2022	8:15 PM		500/1585

OVEN 7	4/25/2022	10:20 AM		550/1608
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4/26/2022	8:30 AM		800/1609
4/27/2022	8:45 AM		800/1609
4/28/2022	3:45 PM		801/1604
4/29/2022	12:00 PM		500/1601

OVEN 8

4/25/2022	11:40 AM		500/1613
4/26/2022	12:35 PM		500/1608
4/27/2022	10:00 AM		800/1605
4/28/2022	9:30 AM		789/1587
4/29/2022	12:35 PM		419/1602

OVEN 9

4/25/2022	8:30 PM		800/1600
4/26/2022	12:30 PM		800/1600
4/27/2022	9:00 PM		800/1600
4/28/2022	12:00 PM		641/1544
4/29/2022	6:30 PM		800/1600