

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

N663761555

FACILITY: D.C. Byers Co.		SRN / ID: N6637
LOCATION: 5946 Clay Ave SW, GRAND RAPIDS		DISTRICT: Grand Rapids
CITY: GRAND RAPIDS		COUNTY: KENT
CONTACT: Doug Lectka , President/Owner		ACTIVITY DATE: 01/12/2022
STAFF: April Lazzaro	COMPLIANCE STATUS: Non Compliance	SOURCE CLASS: Minor
SUBJECT: Unannounced, self-initiated inspection.		
RESOLVED COMPLAINTS:		

Staff, April Lazzaro, arrived at the facility to conduct an unannounced, self-initiated inspection and met with Doug Lectka, President/Owner.

FACILITY DESCRIPTION

D.C. Byers Co. conducts industrial sandblasting at this facility in a room at the rear of the building. This operation is permitted pursuant to Permit to Install 280-99. No odors or visible emissions were noted upon my arrival.

COMPLIANCE EVALUATION

Mr. Lectka escorted me to the rear of the building where sandblasting occurs. An employee dons a suit and utilizes a self-contained breathing apparatus while conducting the sandblasting. We were able to enter the room because the employee was taking a break and the sand had settled. The room is rectangular in size and is accessed by a door from inside the facility. The back wall has a square duct on the upper northeast side that vents to the cartridge filter collector system. The south end of the room has a large bay door that was not completely closed, and an additional closed man door was located along the southeast side.

When we exited out the man door of the sandblast room, I observed large quantities of sand covering the exposed portions of the parking lot, as well as sand on top of the snow downwind of the cartridge filter exhaust duct.

Mr. Lectka and I discussed the sand, and he informed me that he has been applying the dirty/used sandblast sand on the parking lot for traction on snow and ice. I informed him that this practice is not considered proper disposal of a waste and must be discontinued. He asked for additional information related to this practice, and I stated that it would be provided.

The employee started sandblasting, and there was some minor grittiness noted on my clipboard and paper, near the exhaust for the cartridge filter, however I did not observe a noticeable plume of sand. I asked Mr. Lectka how often the drum below the cartridge filter collector was emptied and he did not know.

Based on the amount of sand on the floor within the sandblast room, it is unlikely that the cartridge filter is collecting much sand. A visual observation did not find obvious defects to the unit, but the operating condition and filter status is unknown.

I discussed with Mr. Lectka that the use of the sand on the parking lot, and the fact that it was blowing around, as evidenced by the sand on undisturbed snow, is a violation of Air Quality Division Rules. Specifically, Rule 336.1370(1) states, "Collected air contaminants shall be removed as necessary to maintain the equipment at the required operating efficiency. The collection and disposal of air contaminants shall be performed in a manner so as to minimize the introduction of contaminants to the outer air."

PTI No. 280-99 requires maintenance of the cartridge filter system, and as indicated above the internal status of the unit is unknown. A request for an internal inspection, and report of findings will be made.

The permit also limits the amount of sand to 1,300 tons per 12-month rolling time period as determined at the end of each calendar month. Mr. Lectka is not maintaining 12-month rolling records, but he did provide me with his sand purchase records, which required that I total them for a 12-month period. The total I calculated was 306.7 tons of sand. While the unit appears within the sand usage limitation, the failure to maintain 12-month rolling totals is a violation of PTI No. 280-99 Special Condition No. 5.

CONCLUSION

D.C. Byers was in non-compliance at the time of the inspection for failure to properly collect and dispose of air contaminants and failure to maintain records required by PTI No. 280-99.



Image 1(EUSANDBLAST) : Cartridge filter collector for sandblasting operation.



Image 2(EUSANDBLAST) : Sand storage tower.



Image 3(EUSANDBLAST) : Base of sand storage tower and cartridge filter collector.



Image 4(EUSANDBLASTING) : One area of parking lot where sand has been applied and becoming air contaminant.

NAME April Lazzaro

DATE 01/20/2022

SUPERVISOR HH