DEPARTMENT OF ENVIRONMENTAL QUALITY AIR QUALITY DIVISION

ACTIVITY REPORT: Self Initiated Inspection

N714747248		•
FACILITY: DeWitt Barrels, Inc		SRN / ID: N7147
LOCATION: 1125 Comstock Street, MARNE		DISTRICT: Grand Rapids
CITY: MARNE		COUNTY: OTTAWA
CONTACT: Peter DeWitt , Vice President		ACTIVITY DATE: 12/03/2018
STAFF: Tyler Salamasick	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: Evaluation of paint b	ooth installation/operating status.	
RESOLVED COMPLAINTS:		

Background

Dewitt Barrels SRN: N7147 is barrel recycling facility that specializes in washing and reconditioning used chemical barrels and totes. The production facility is located at 1125 Comstock Street, Marne, Michigan 49435. Dewitt Barrels is located in a small industrial area surrounded by agricultural and residential areas. The nearest residential structure is located approximately 850 feet ESE of the facility. The facility was inspected on 12/3/2018 by Wade O'Boyle Environmental Quality Analyst of the Michigan Department of Environmental Quality, Hazardous Waste and Radiological Protection Division and by Tyler Salamasick, Environmental Quality Analyst of the Michigan Department of Environmental Quality, Air Quality Division.

The MDEQ was conducting a follow up inspection based upon an inspection conducted on 1/11/2018. Dewitt Barrel was recently acquired by ICS which was then acquired by Mauser Packaging Solutions. The facility has gone through significant restructuring. During the past inspection, Kim Miller Environmental Director (now Vice President of Environmental, Health and Safety) from Dewitt Barrel's parent company Industrial Container Services (now the Reconditioning Division Mauser Packaging Solutions) indicated that Dewitt did not intent to operate the facility's permitted paint booth and would request that the permit be voided. Almost a year later the facility was flagged to report for MAERS. Dewitt had not requested to void the permit for the coating line and was still potentially subject to reporting emissions.

Inspection

We arrival on site on 12/3/2018. We met with Jason Dewitt, Facility Manager, introduced ourselves and informed Jason of the intent of the inspection. I explained to Jason that the facility was flagged to report to MAERS and that I was informed that they were going to put in a request to void the paint booth permit (PTI 134-02D) but had not yet submitted the request.

Jason told me that the facility has not been using the paint booth and that the majority of the booth was disconnected and partially removed. He also told me that the barrel and drum washing has been moved to different states. Dewitt is currently in the process cleaning out left over steel drums that were too damaged to recondition and are sending the barrels to a scrap metal recycler. The facility is not currently operating any of the washing lines for totes, drums or barrels. Jason indicated that he did not know if they would be washing any containers, instead they may convert the facility into a distribution hub.

After our discussion we walked through the facility and confirmed that the drum line, the tote line and the barrel line were no longer operating. The facility did not have as strong of a chemical odor as it had during the previous inspection on 1/11/2018. We also inspected the paint coating line, which was no longer operable. The paint guns, atomizers, control panel and power were disconnected. The facility no longer has coating stored in the paint area. The remainder of the booth is primarily just the shell with a

remaining disconnected conveyor system.

While walking through the facility we observed a significant amount of liquid under the steel drum line. The liquid was purple with a white froth or crust. The majority of the facility has a black grim on the ground. During this time, Wade discussed some of the hazardous waste regulation with Jason.

After the inspection Wade provided Jason Dewitt, Tyler Phillipeck and Kim Miller with additional information as well as a few suggested areas of improvement. Wade informed them that the owners (Mauser Packaging Solutions) must submit an up to date Site ID. He also noted that the waste generated on site must be characterized and managed correctly.

Kim and I discussed the permit and she had Barry Robertson from Stillwater Technologies submit a request to have the air permit voided (see attachment). The equipment is no longer functional and is in the process of being completely removed. The other processes with the potential to generate air contaminants at the facility have either been removed or are no longer being operated. Dewitt Barrel no longer appears to generate any significant air emissions.

Conclusion

It appears that Dewitt Barrels is in compliance with the requirements of the federal Clean Air Act; Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451); the Air Pollution Control Rules; and PTI No.134-02D. The request to void PTI No. 134-02D has been submitted and the equipment has been uninstalled. The equipment has not been operated and the facility will not need to submit emissions records to MAERS.

DATE 12/13/18