

**DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: Self Initiated Inspection**

U7008012844716

FACILITY: K-Line Industries, Inc		SRN / ID: U70080128
LOCATION: 315 Garden Avenue, Holland		DISTRICT: Grand Rapids
CITY: Holland		COUNTY: OTTAWA
CONTACT:		ACTIVITY DATE: 06/07/2018
STAFF: Tyler Salamasick	COMPLIANCE STATUS: Compliance	
SUBJECT: Multi-media complaint investigation		
RESOLVED COMPLAINTS: C-18-01545		

Background

K-Line Industries, Inc. (K-Line) is a machining facility located at 315 Garden Avenue, Holland, Michigan. K-Line is located in a primarily industrial area with the nearest residential structure approximately 2000 feet to the north of the facility. The facility was inspected on 6/7/2018 by Tyler Salamasick, Environmental Quality Analyst of the Michigan Department of Environmental Quality, Air Quality Division and Wade O'Boyle, Environmental Quality Analyst of the Michigan Department of Environmental Quality, Waste Management and Radiological Protection Division. The intent of the inspection was to investigate complaint C-18-01545, which claimed that K-line directs its employees to place used oil and used coolant into a solid waste dumpster on the property. It also alleged that the facility has an air quality problem associated with metal dust.

Inspection

Site arrival was at 2:26 pm on 6/7/18. We drove around the facility and made general observations. I did not detect abnormal odors in the area. I did not observe fugitive dust or any visible emissions from the facility. We entered the property and we were granted access by K-Line staff member Andrea Rabineau. Controller and Director of Business Administrations, Steven Kammeraad met with us. Upon meeting we present our State of Michigan identification cards and informed the facility representative of the intent of the inspection. We informed him that we received a multi-media based complaint regarding potential air emission and improper waste handling and that we would like to inspect the facility.

Steven showed us the facility from a process-based approach. The facility manufactures specialized tools for agricultural equipment and heavy equipment. The facility uses high precision CNC cutting to form parts. Steve described the process starting with bar stock. The metal is cut in the CNC machine and some components are bent to shape. The facility uses an outside source to coat their parts. Once coated, the parts are shipped back to the facility where they are then laser etched and possibly cut or welded, depending on the project. The facility operates as a job shop, meaning that they run parts depending on customer demand. They may produce a part for a short period of time, and then not make that component again for extended periods of time.

The CNC and cutting was vented internally and did not appear to generate air contaminants to the outside air. The metal grinding was a wet grind with coolant and also vented internally. The majority of the facility's processes involved some form of metal cutting or CNC machining and they appeared to meet the R 336.1285(2) (l)(vi)(B) exemption from requiring a permit (Rule 201), which in part states...

...(2) The requirement of R 336.1201(1) to obtain a permit to install does not apply to any of the following:...

...(l) The following equipment and any exhaust system or collector exclusively serving the equipment:

vi) Equipment for carving, cutting, routing, turning, drilling, machining, sawing, surface grinding, sanding, planing, buffing, sand blast cleaning, shot blasting, shot peening, or polishing ceramic artwork, leather, metals, graphite, plastics, concrete, rubber, paper board, wood, wood products, stone, glass, fiberglass, or fabric which meets any of the following:...

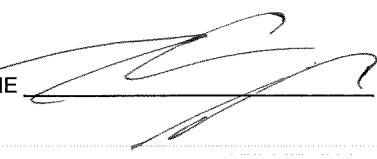
...(B) Equipment that has emissions that are released only into the general in-plant environment.

I did not observe any other processes during the investigation that would appear to generate significant air emissions. We walked outside of the facility and observed historic metal staining on the pavement near the doorways. There was a section of new pavement which was unstained and that appeared to indicate the dust was no longer an issue. Steven explained that he believed the stains were from well into the past when the facility used to do predominantly grinding.

Conclusion

It appears that K-line is in compliance with the Federal Clean Air Act Part 55, Air Pollution Control, of

the Natural Resources and Environmental Protection Act of 1994, PA 451, as amended, and Michigan's Air Pollution Control Rules. I did not substantiate the claims made in the complaint.

NAME 

DATE 6/20/2018

SUPERVISOR 