

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

N644237895

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: 12/01/2016
STAFF: April Lazzaro	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: Unannounced, self-initiated inspection.		
RESOLVED COMPLAINTS:		

Staff, April Lazzaro arrived at the Industrial Stripping Services (iSS) facility to conduct an unannounced, self-initiated inspection. No odors or visible emissions were identified upon approaching the facility. Staff met with Josh Zandstra, Plant Manager. I informed Mr. Zandstra of the fallout issues occurring to the east of him on 29<sup>th</sup> Street at several automotive dealerships.

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. Zandstra explained in detail how 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. Some Safety Data Sheets were provided and of those reviewed; they did not contain the restricted items. 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: not in operation  
 Oven 2: 1,640°F  
 Oven 3: 1,560°F  
 Oven 4: not in operation  
 Oven 5: not in operation  
 Oven 6: not in operation  
 Oven 7: 1,597°F  
 Oven 8: not in operation  
 Oven 9: not in operation

Mr. 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. A few of the ovens have had or will have some upgrades to the afterburner units and monitoring systems which based on the cost does not appear to be considered reconstruction on a per emission unit basis. The units involved include Oven 2, 3, 6 and 7. Additionally, the stacks and roof is inspected and approximately two 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.

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 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, which Mr. Zandstra confirmed is 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 compliance at the time of the inspection.

NAME Asu C. Zandstra

DATE 12-14-16

SUPERVISOR [Signature]