

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: Scheduled Inspection

N368950440

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| FACILITY: Consolidated Stripping & Derusting | | SRN / ID: N3689 |
| LOCATION: 942 Industrial Parkway, PLAINWELL | | DISTRICT: Kalamazoo |
| CITY: PLAINWELL | | COUNTY: ALLEGAN |
| CONTACT: Don Schmidtke , CFO | | ACTIVITY DATE: 08/28/2019 |
| STAFF: Cody Yazzie | COMPLIANCE STATUS: Non Compliance | SOURCE CLASS: |
| SUBJECT: Scheduled Inspection | | |
| RESOLVED COMPLAINTS: | | |

On August 29, 2019 Air Quality Division (AQD) staff (Cody Yazzie, Rachel Benaway, and Matt Deskins) arrived at 942 Industrial Parkway Plainwell, Michigan at 9:30 AM to conduct an unannounced air quality inspection of Consolidated Stripping & Derusting (hereafter CSD). Staff made initial contact with Don Schmidtke and stated the purpose of the visit was to conduct an unannounced inspection of the facility.

The facility manufactures their own line of blasting cabinets, media reclaimers, blast room equipment. The facility also serves as a paint removal and blasting media needs. CSD has around 9 staff that are currently employed. The facility typically operates Monday through Friday from 8:30 AM to about 3:30 PM.

CSD was last inspected by the AQD on July 11, 2006 and appeared to be in Compliance at that time with PTI No. 173-93. Staff asked, and Mr. Schmidtke stated that the facility does not have any emergency generators or cold cleaners.

Mr. Schmidtke escorted Staff around the facility. Required personal protective equipment are safety glasses, hearing protection, and steel toe boots. Staff observations and review of records provided during and following the inspection are summarized below:

Blu-Surf Bake-Off Oven:

During the inspection the facility had active PTI No. 178-93 that was issued on May 1, 1993. Since that time AQD has record of inspecting the facility a few times with the most recent being on July 11, 2006. It was observed during the inspection that the Bake-off Oven was removed. Mr. Schmidtke was able to find record of when the oven was sold. Staff was provided with a letter from Mr. Schmidtke that PTI No. 178-93 should be voided due to it being sold on October 31, 2018 and no longer located at the facility.

Gasification Wood Boiler:

Staff received a referred complaint from the EPA on September 4, 2018. This complaint showed a YouTube Video of Mr. Schmidtke using a tire to fuel the gasification boiler at the facility. Staff questioned Mr. Schmidtke about burning tires in the gasification boiler. Mr. Schmidtke did admit to using a tire as fuel once for that specific YouTube Video. Mr. Schmidtke stated that he never again burned any tires in the boiler. Staff was informed that the boiler is used during the winter months to provide space heating for the facility. When Staff looked inside the boiler during the inspection the burn box of the boiler appeared to only have remnants of wood pallets that are typically the fuel source of choice for the facility. Mr. Schmidtke did state occasionally a stump or other wood that is piled up next to the boiler could be used.

The gasification boiler is a homemade boiler that Mr. Schmidtke designed himself. The exemption for fuel-burning equipment which is used for space heating or service water heating does have specific requirements in type of fuel that can be used and to what maximum rated heat input capacity the boiler can have. Staff explained that the only materials that can be used as fuel in the wood boiler are wood, wood residue, or wood waste that is not painted or treated with wood preservatives, which does not contain more than 25% plywood, chipboard, particleboard, and other types of manufactured wood boards that are not contaminated with other waste materials. Staff further explained that this would mean that tires could not be burned in gasification wood boiler.

Staff was provided with the dimensions of the fire box. The fire box of this gasification boiler was reported as 33 inches wide, 40 inches tall, and 28 inches deep. This was compared to other wood boilers with fire boxes of similar volume. Specifically the GS400 from Heat Masters reports that this series of wood boilers have a BTU of 340,000. The dimensions of the GS400 series boiler are 30 inches wide, 42 inches in length, and 40 inches in height. It would appear that the gasification boiler's maximum heat input capacity would be less than 6,000,000 BTU.

Coating Line:

CSD does have a coating line that applies paint at the facility. Staff was provided with the label of the paint that the facility uses. The label indicated that the paint was a BEHR Premium Plus Interior / Exterior Hi-Gloss Enamel Deep Base No. 8300. The SDS indicates that the coating contains 115 gm/L excluding water. Mr. Schmidtke indicated that the coating line used about 4 gallons of paint per month. Rule 287(2)(c) exempts all coating lines from obtaining a PTI if the coating usage rate is not more than 200 gallons, as applied, minus water, per month. The rule also requires that any exhaust system that serves only coating spray equipment is supplied with a dry filter control or water wash equipment. No records were provided to show that the required less than 200 gallons per month were being applied on that coating line. Records are required to be maintained on file for the most recent 2- year period and are made available upon request. The facility was also spraying the coatings with guns outside with no control equipment. Staff told Mr. Schmidtke that this was not in compliance with the exemption Rule 287(2)(c) and is a Rule 201 violation.

Sand Blasting Operations:

The facility has 3 hand sandblasting units and 1 sandblasting room located inside the facility. The sandblasting units and room are equipped with dust collectors that vent inside. This equipment appears to be exempt from permitting under Rule 285(2)(l)(vi)(B).

Metal Fabrication Equipment:

CSD also operated small welding and metal fabrications stations. Observed equipment would be used for welding, grinding, and shearing. These equipment stations appear to be exempt from permitting under Rule 285(2)(i) and Rule 285(2)(l)(vi)(B).

At the time of the inspection and based on a review of records obtained during or following the inspection, the facility appears to be in non-compliance with Rule 201. Staff stated to Mr. Schmidtke that a violation notice would be sent to the facility for the not complying with the requirements under Rule 287(2)(c). If a coating line is not following the requirements under 287(2)(c) then this is a violation of Rule 201 for not obtaining a permit to install. The facility should respond to the sent violation notice with how the company plans to comply with Rule 287(2)(c) or apply for a Permit To Install. Staff concluded the inspection at 11:00 AM.-CJY

NAME Cathy Yonagan

DATE 9/18/19

SUPERVISOR RIL 9/20/19