

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

N830030423

FACILITY: K & S SERVICES		SRN / ID: N8300
LOCATION: 20401 GLADWIN AVE, TAYLOR		DISTRICT: Detroit
CITY: TAYLOR		COUNTY: WAYNE
CONTACT: Jeff Truitt , VP Operations		ACTIVITY DATE: 07/28/2015
STAFF: Katherine Koster	COMPLIANCE STATUS: Non Compliance	SOURCE CLASS: MINOR
SUBJECT: FY2015 Scheduled Inspection		
RESOLVED COMPLAINTS:		

REASON FOR INSPECTION: Targeted Inspection
 INSPECTED BY: Katie Koster, AQD
 PERSONNEL PRESENT: Grayson Layne
 FACILITY PHONE NUMBER: 734-374-0400
 FACILITY FAX NUMBER: 734-857-2058

FACILITY BACKGROUND

K+S Services performs mechanical and electronics equipment repair and has a facility in Taylor and one in Southgate which is also the corporate office. K+S Services also owns Beech Services, LLC which rebuilds electric motors. Beech Services used to be located in Dearborn Heights but moved to the K+S Taylor location in December 2008. The general repair process involves disassembly, sand blasting, degreasing, re-assembly, testing, varnish dipping, and painting. The current location employs runs one shift, Monday through Friday, from 7 a.m. to 5:00 p.m. Customers include the automotive, aerospace, and food and beverage industry.

INSPECTION NARRATIVE

AQD inspector, Katie Koster, arrived at K+S Services on July 28, 2015. I met with Mr. Grayson Layne, vice president of operations for K+S Services. I stated the purpose of my inspection and presented identification.

Mr. Layne accompanied me about the facility. The facility is involved in two separate repair functions. K+S repairs mechanical equipment such as pumps and cylinders and Beech Services repairs electric motors. The facilities have separate operations except that they share a paint booth.

Electric motor repair involves use of a burnoff oven, varnish dip, and bake oven. The mechanical repair side does not use any of this equipment except for some occasions when parts are placed in the bake oven to dry residual water.

We viewed the varnish dip tank which was not in use. At the time of the inspection, the cover was closed and appeared to be in acceptable condition. I did not observe any cracks or holes. Mr. Layne stated that the tank was filled with one 55 gallon drum of varnish per year. After the parts are varnish dipped, they are placed in an electric bake oven to cure the varnish. There are two bake ovens which operate between 225-250 degrees Fahrenheit. If the oven temperature exceeds 250, it automatically shuts off. One of the ovens is from Beech Services and the other was already on site at K+S Services.

A burnoff oven is on site which was located at the previous Dearborn Heights location. When the winding is removed from the motor, the varnish needs to be burned off so that the wire can be recoated. The oven was manufactured by Bayco is in use about twice a week, 3-4 hours at a time. It was not use. I inquired about the afterburner temperature records but Mr. Layne did not have any information.

One enclosed sand blasting unit and associated indoor fabric filter is present. Sand blasting is sometimes used to clean the parts, and the sand is continuously recycled throughout the process. This equipment is vented to the in-plant environment.

MACES- Activity Report

There is also an area where minor welding is performed and wire is stripped after the oven and this area was equipped with an interior hood and dust collector venting inside.

Various electrical and hydraulic test equipment is located throughout the facility.

There are parts washers throughout the facility that all appeared to be in use.

We proceeded to his office where we discussed the permit for the burnoff oven and records required. It did not appear that the facility was maintaining any of the required information. Complete temperature records were not available and the temperature graph provided did not appear to be reaching the required afterburner temperature.

APPLICABLE RULES/PERMIT CONDITIONS

Equipment appears to be exempt except for the burn off oven.

Varnish dip tank and bake ovens exempt per Rule 287(c)

Sand Blasting and wire stripping exempt per Rule 285(l)(vi)(B)

Welding exempt per Rule 285(i)

General Permit 195-09 – NOT IN COMPLIANCE. I requested the following records and facility was unable to provide any of them. Additionally, the one record of temperature that was provided indicated that the afterburner was not reaching the required minimum temperature.:

- Temperature records for the afterburner recorded once every 15 minutes from May – July 2015 per Condition 1.11. Note, the permit requires that records be maintained for the last 5 years.
- Calibration records demonstrating that the thermocouples for the primary chamber and afterburner have been calibrated on a yearly basis per Condition 1.9 and 1.10.
- Documentation of the presence of an interlock system that is activated when the afterburner is not operating properly per Condition 1.8 and 1.14.
- Records of any maintenance or malfunctions of the oven per Condition 1.12.
- Stack height per Condition 1.15.

APPLICABLE FUGITIVE DUST CONTROL PLAN CONDITIONS:

N/A

MAERS REPORT REVIEW:

N/A. This facility does not appear to be subject to MAERS reporting.

FINAL COMPLIANCE DETERMINATION:

At this time, the burn off oven does not appear to be operating in compliance with permit to install 195-09. A violation notice will be issued.

NAME Kate Kise

DATE 9/29/15

SUPERVISOR W.M.