DEPARTMENT OF ENVIRONMENTAL QUALITY AIR QUALITY DIVISION

ACTIVITY REPORT: Scheduled Inspection

P050324401

FACILITY: IFCO Systems		SRN / ID: P0503	
LOCATION: 5445 International Pkwy SE, GRAND RAPIDS		DISTRICT: Grand Rapids	
CITY: GRAND RAPIDS		COUNTY: KENT	
CONTACT: Mike Dowker , General Manager		ACTIVITY DATE: 02/12/2014	
STAFF: David Morgan	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR	
SUBJECT:			
RESOLVED COMPLAINTS:			

At 11:00 A.M. on February 12, 2014, Air Quality Division staff Dave Morgan conducted an unannounced scheduled inspection of IFCO Systems located at 5445 International Pkwy SE in Cascade Township. The purpose of the inspection was to determine the facility's compliance with state and federal air pollution regulations. Accompanying AQD staff on the inspection was Mike Dowker, General Manager. A DEQ Inspection Brochure was presented to Mr. Dowker.

FACILITY DESCRIPTION

IFCO Systems receives, stores, repairs and re-paints wooden pallets. The facility consists of a single repair line and a coating operation. The facility is considered a true minor source of VOC and particulate emissions.

COMPLIANCE EVALUATION

There is a single conveyor line where pallets are repaired through a series of stations that include sawing, grinding, and nailing. Because any emissions from the grinding and sawing operations are released to the in-plant environment, these stations are exempt from air use permitting under Rule 285(I)(vi)(B).

After the pallets are refurbished, they are sent through one of two separate spray booths used to apply paint to two sides of the pallet. The paint is a Kelly Moore blue with a VOC content of 0.04 pounds per gallon. The pallets are then stenciled with a white inkjet ink. The ink has a VOC content of 0.85 pounds per gallon. The spray booths and ink station are all exempt from air use permitting under Rule 290. In February 2013, prior to installation, documentation was submitted which demonstrated that the equipment could meet Rule 290 limits. Records obtained as part of the inspection show that the company has not exceeded 12 pounds per month since beginning operation in March 2013. This is well below the VOC limit of 1,000 pounds per month in the rule (see attached records).

SUMMARY

IFCO appears to be in compliance with all applicable requirements. Attached to this report are company records.