

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

P074536832

FACILITY: K & R Services	SRN / ID: P0745
LOCATION: 601 East Roosevelt, ZEELAND	DISTRICT: Grand Rapids
CITY: ZEELAND	COUNTY: OTTAWA
CONTACT: Chris Young , Production Manager	ACTIVITY DATE: 09/21/2016
STAFF: April Lazzaro	COMPLIANCE STATUS: Non Compliance
SOURCE CLASS: Minor	
SUBJECT: Unannounced, self-initiated inspection.	
RESOLVED COMPLAINTS:	

Staff, April Lazzaro and Adam Shaffer arrived at the facility to conduct an unannounced, self-initiated inspection and met with Chris Young, Production Manager and Ashley Murphy, Accounting/Quality. The DEQ Environmental Inspections: Rights and Responsibilities brochure was provided and its contents briefly discussed. Mr. Young and Ms. Murphy were informed about the fallout occurring in the neighborhood. Neither indicated that they were familiar with the situation nor were they aware of fallout in their parking lot.

K & R Services is a metal cleaning operation which cleans metal parts coated with oil, using various cleaning solutions.

The first area viewed at the facility was where inspection takes place after the parts are cleaned. There employees sorted parts to make sure they meet visual specifications prior to going to the customer for final use. As we walked along the perimeter, there were various stations where this was taking place.

We observed the deburring and buffing equipment that was internally vented, and did not appear to be a source of air pollution. In one of the drums, corn cobs were used to dry the parts after the deburring process.

K & R operates two belt washer lines and two drum washer lines which all use the same chemicals to clean the metal parts. At the rear of the operations, the totes with the chemicals used were observed, and the names were written down. Instead of asking the employees for the Safety Data Sheets, AQD staff indicated we would get the information straight from the manufacturer. We indicated if we weren't successful, we would ask for K & R's assistance.

The items used include: MP227 a rust inhibitor, Parts wash L590 (potash/steel), Metclean 7LF (aluminum/brass), LB710 (finishing compound) and AD 593.

The Metclean 7LF and the LB710 polishing compound are both acids. Due to the fact that emissions generated from the lines are vented externally, this excludes them from utilizing the Rule 285(l)(iii) exemption. The ductwork collects the emissions off the line and then directs them to one main ductwork trunk which is exhausted out the side of the building through a large wall fan. The exterior housing of this fan has a buildup of material and emissions of mist/steam were observed as well as mild odors which were noted in the parking lot. The Rule 285(l)(iii) exemption provides that equipment and any exhaust system serving the equipment used for surface preparation of metals by use of aqueous solutions, except for acid solutions are exempt from needing a Permit to Install. A Violation Notice will be issued.

The facility also has two ultrasonic washers that are internally vented that utilize a citric acid cleaner. Due to the fact that these tanks are internally vented, they can use the Rule 285(r)(iv) permit exemption that allows equipment used for metal treatment process if the process emissions are only released into the general in-plant environment, and includes cleaning.

A copy of the Rule 290 exemption documentation will be provided to the company, however a permit is the recommended route to compliance.

The facility was in non-compliance at the time of the inspection.

NAME *[Handwritten Signature]*

DATE 9-28-16

SUPERVISOR *[Handwritten Signature]*