

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

U41190260047978

FACILITY: Imperial Metal Products Company		SRN / ID: U411902600
LOCATION: 835 Hall Street S.W., Grand Rapids		DISTRICT: Grand Rapids
CITY: Grand Rapids		COUNTY: KENT
CONTACT: Adam R. Dean , General Manager		ACTIVITY DATE: 02/22/2019
STAFF: Adam Shaffer	COMPLIANCE STATUS: Compliance	SOURCE CLASS:
SUBJECT: Self-initiated inspection		
RESOLVED COMPLAINTS:		

Air Quality Division (AQD) staff Adam Shaffer (AS) arrived at the Imperial Metal Products Company (IMP) located in Grand Rapids, MI at 10:08 am on February 22, 2019 to complete a self-initiated inspection.

Facility Description

Prior to entering the facility, off-site odors and visible emission observations were completed. The weather conditions at the time of the inspection were winds from the east at 5-10mph, high 20's °F and sunny skies. Emissions observed appeared to be steam and no identifiable odors were noted.

Upon arrival, AQD staff AS met with Mr. Adam R. Dean, General Manager, who provided a tour of the facility, provided requested documents and helped answer site specific questions. IMP is a metal fabrication facility for various areas of business such as automotive, aerospace and defense. The site currently doesn't operate with an air pollution control permit, but instead utilizes equipment which potentially falls under various air permit exemptions.

Observations

- During the course of the inspection, various stages of metal fabrication such as cutting, threading and bending of metal products was observed. Cutting oils were used in several of the metal fabrication areas. Emissions from the metal fabrication processes were vented internally and appear to be exempt per Rule 285(2)(l)(i) or Rule 285(2)(l)(vi)(B).
- Two reclaim hoppers were observed where cutting oil is reclaimed from waste metal shavings from the fabrication process. One hopper was observed venting internally and the second was observed venting externally into a waste container located adjacent to the building. Piles of metal shaving waste were observed adjacent to the waste container. Moving forward, IMP shall adequately capture waste from the hopper. In a phone conversation on February 28, 2019, it was stated that Mr. Dean had spoken with maintenance to get it cleaned up.
- A welding area was observed that appears to be exempt per Rule 285(2)(l).
- Several stacks and other associated air emission equipment was observed on the northeastern portion of the site building. Mr. Dean stated that this was from previous site operations and no longer in use.
- Two parts washers were observed during the course of the site inspection. One parts washers' lid was open at the time of the inspection. AQD staff AS informed IMP staff to keep the lid closed when not in use to prevent fugitive emissions. The two parts washers have an air/vapor interface area of less than 10 square feet and appear to be exempt per Rule 281(2)(h) and/or Rule 281(2)(k).
- Two washing machine systems were observed during the course of the site inspection. Metal parts from the fabrication process, which are covered in cutting oil, are sent to these two units. One washing system vents internally and appears to be exempt per Rule 285(2)(r). The second washing machine was observed and initially believed to vent externally. In a phone conversation on February 28, 2019, between AQD staff AS and IMP staff Mr. Dean, it was concluded that the fan for the stack doesn't work and the unit vents internally. Moving forward, it was discussed with IMP staff on capping or removing the stack to adequately demonstrate that the washing system does vent internally. The second washing system appears to be exempt per Rule 285(2)(r).

Conclusion

Based on the review of the records provided and the facility walk through, IMP appears to be in compliance with all applicable air pollution control rules.

NAME Adam J. Bradford

DATE 03/06/19

SUPERVISOR 