



Industrial Container Services – MI, LLC  
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September 24, 2020

April Lazzaro  
Senior Environmental Quality Analyst  
Air Quality Division  
Michigan Department of Environmental Quality  
350 Ottawa Avenue, NW  
Unit 10  
Grand Rapids, MI 49503-2341

RE: Violation Notice August 31, 2020  
Industrial Container Services – MI, LLC  
SRN: B1715

Ms. Lazzaro,

This letter is in response to the Violation Notice dated 8/31/2020 pertaining to a failure to properly monitor and record visible emissions from the furnace in an acceptable manner.

The current opacity meter was installed in 2008 and has been in use ever since. The report logs from the meter were reviewed during the 2020 inspection and were deemed not acceptable anymore by Michigan DEQ. It was also discovered that the opacity meter was not included in the Preventative Maintenance Plan / Malfunction Abatement Plan.

This violation was found during the 7/8/2020 inspection. The violation was caused by the opacity logs being somewhat confusing and hard to read and since they are paper logs, they are even harder to read once they are scanned. The duration of this violation is not easily traced as the logs were used during submittals and readable in January of 2020 so it must have started sometime between then and now and would have been ongoing at that point.

To respond to and correct these items Industrial Container Services – MI, LLC (ICS-MI) has ordered a new digital data logging system. ICS-MI will be installing a Data-Q DI808 Web-based Data Logging System. It is accessible through any device that connects to the internet (web browser) and data can also be pulled from the data logger via USB. There will also be an alarm system warning the operator at 15% opacity and adjustments need to be made, and another at the high limit to tell the operator to stop loading the furnace.

ICS-MI has also revised the Preventative Maintenance Plan to include the opacity meter to be calibrated once a month (1<sup>st</sup> of every month is the plan). Calibration will follow the operation manual.

The Data logger has already been ordered and should be arriving at the facility in about 3 weeks. It will be installed as soon as it is in, so the estimated install date is 10/15/2020. Revisions to the PM Plan have already been made.

If you have any questions or comments feel free to reach out to Mike Laarman at [Mike.Laarman@mauserpackaging.com](mailto:Mike.Laarman@mauserpackaging.com) or (616) 205-1795 or Tyler Phillippeck at [tyler.phillipeck@mauserpackaging.com](mailto:tyler.phillipeck@mauserpackaging.com) or (513) 526-2471.

Regards,

Tyler Phillippeck  
Project Engineer  
Mauser Packaging Solutions