



STATE OF MICHIGAN  
 DEPARTMENT OF  
 ENVIRONMENT, GREAT LAKES, AND ENERGY  
 GRAND RAPIDS DISTRICT OFFICE



GRETCHEN WHITMER  
 GOVERNOR

LIESL EICHLER CLARK  
 DIRECTOR

August 31, 2020

Mr. Mike Laarman  
 Industrial Container Services - MI, LLC  
 4336 Hansen Street SW  
 Grand Rapids, Michigan 49548

SRN: B1715, Kent County

Dear Mr. Laarman:

**VIOLATION NOTICE**

On July 8, 2020, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of Industrial Container Services - MI, LLC located at 4336 Hansen Street SW, Grand Rapids, Michigan. The purpose of this inspection was to determine Industrial Container Services - MI, LLC's compliance with the requirements of the federal Clean Air Act; Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451); the Air Pollution Control Rules; and the conditions of Permit to Install (PTI) number 814-91B.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
Drum Reclamation Furnace	Permit to Install No. 814-91B, Special Condition No. 1.11	Failure to monitor and record visible emissions from the furnace in an acceptable manner

Data collected by the opacity monitor was reviewed and discussed with company representatives. This review indicated that while opacity data was being collected, it is not in a format that can be used to determine compliance and as such is not considered acceptable to the AQD.

Additionally, the current Preventative Maintenance Plan / Malfunction Abatement Plan does not include the opacity monitor. Pursuant to this letter, please revise the plan to include the calibration, cleaning and maintenance of the opacity monitor.

Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by September 21, 2020 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the violation occurred; an explanation of the causes and duration of the violation;

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whether the violation is ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violation and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

Please submit the written response to EGLE, AQD, Grand Rapids District, at 350 Ottawa Avenue NW, Unit 10, Grand Rapids, Michigan 49503 and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Industrial Container Services - MI, LLC believes the above observations or statements are inaccurate or do not constitute violations of the applicable legal requirements cited, please provide appropriate factual information to explain your position.

Thank you for your attention to resolving the violation cited above and for the cooperation that was extended to me during my inspection of Industrial Container Services - MI, LLC. If you have any questions regarding the violation or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,



April Lazzaro  
Senior Environmental Quality Analyst  
Air Quality Division  
616-558-1092

cc: Ms. Mary Ann Dolehanty, EGLE  
Dr. Eduardo Olaguer, EGLE  
Ms. Jenine Camilleri, EGLE  
Mr. Christopher Ethridge, EGLE  
Ms. Heidi Hollenbach, EGLE