



GRETCHEN WHITMER
GOVERNOR

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



LIESL EICHLER CLARK
DIRECTOR

January 28, 2021

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

SRN: B1715, Kent County

Dear Mr. Phillipeck:

VIOLATION NOTICE

On December 21, 2020, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), requested records from Industrial Container Services - MI, LLC (ICS) located at 4336 Hansen Street SW, Grand Rapids, Michigan. The purpose of this request was to determine ICS' 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 records request, staff observed the following:

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

After a December 21, 2020 request for opacity data logger records, ICS reported on January 8, 2021, that they discovered the data logger had been inadvertently unplugged and that no data was collected for the time period of late November 2020 until the first week of January 2021. This is a violation of PTI No. 814-91B, Special Condition 1.11 that requires the monitoring and recording of visible emissions from the furnace on a continuous basis in a manner and with instrumentation acceptable to the Air Quality Division.

Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by February 18, 2021 (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; whether the violation is ongoing; a summary of the actions that have been taken and

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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.

In addition, as previously requested, please include in the response all opacity data for the month of January 2021 that is available, and the updated Preventative Maintenance Plan/Malfunction Abatement Plan.

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