



GRETCHEN WHITMER  
GOVERNOR

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



PHILLIP D. ROOS  
DIRECTOR

December 20, 2023

Brent Walter  
Drug & Laboratory Disposal, Inc.  
331 Broad Street  
Plainwell, Michigan 49080

SRN: N0656, Allegan County

Dear Brent Walter:

**VIOLATION NOTICE**

On November 29, 2023, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of Drug & Laboratory Disposal, Inc. located at 331 Broad Street, Plainwell, Michigan. The purpose of this inspection was to determine Drug & Laboratory Disposal, Inc. 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) numbers 239-10, 236-10, 759-83A, and 708-83A;

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
FG-DLS-5-HOODS	PTI No. 239-10 Special Condition III.1	During the inspection the facility appeared to be operating FG-DLS-5-HOODS without an OMP plan submitted to the AQD District Office.
FG-DLS-5-HOODS	PTI No. 239-10 Special Condition VI.2	The facility did not provide results of breakthrough testing. Only records of dates that the testing occurred were provided.
FG-DLS-5-HOODS	PTI No. 239-10 Special Condition VI.1	Staff was not provided with maintenance records associated with OMP plan.
FG-DLS-5-HOODS	PTI No. 239-10 Special Condition VI.3	Staff was not provided with records of the waste category and the amount of each waste category that was processed in FG-DLS-5-HOODS on a calendar month basis. Staff requested last 18 months.

FG-DLS-5-HOODS	PTI No. 239-10 Special Condition VI.6	Staff was not provided emission calculations for VOC, acetone, methylene chloride, and tetrachloroethylene for FG-DLS-5-HOODS. Staff requested last 18 months.
FG-DLS-5-SHRED	PTI No. 239-10 Special Condition III.1	During the inspection the facility appeared to be operating FG-DLS-5-SHRED without an OMP plan submitted to the AQD District Office.
FG-DLS-5-SHRED	PTI No. 239-10 Special Condition VI.2	The facility did not provide results of breakthrough testing. Only records of dates that the testing occurred were provided.
FG-DLS-5-SHRED	PTI No. 239-10 Special Condition VI.1	Staff was not provided with maintenance records associated with OMP plan.
FG-DLS-5-SHRED	PTI No. 239-10 Special Condition VI.3	Staff was not provided with records of the waste category and the amount of each waste category that was processed in FG-DLS-5-SHRED on a calendar month basis. Staff requested last 18 months.
FG-DLS-5-SHRED	PTI No. 239-10 Special Condition VI.6	Staff was not provided emission calculations for VOC, acetone, methylene chloride, and tetrachloroethylene for FG-DLS-5-SHRED. Staff requested last 18 months.
EU-DLS-2-MILL	PTI No. 236-10 Special Condition VI.3	The facility did not provide results of breakthrough testing. Only records of dates that the testing occurred were provided.
EU-DLS-2-MILL	PTI No. 236-10 Special Condition VI.1	Staff was not provided with all the maintenance records associated with the OMP plan for EU-DLS-2-MILL. Only records for activated carbon filters were provided.
EU-DLS-2-MILL	PTI No. 236-10 Special Condition VI.4	Staff was not provided with records related to the particulate control filter replacements.
EU-DLS-2-MILL	PTI No. 236-10 Special Condition VI.5	Staff was not provided with records of the waste category and the amount of each waste category that was processed in EU-DLS-2-MILL on a calendar month basis. Staff requested last 18 months.
EU-DLS-2-MILL	PTI No. 236-10 Special Condition VI.7	Staff was not provided emission calculations for VOC, acetone, methylene chloride, and tetrachloroethylene for EU-DLS-2-MILL. Staff requested last 18 months.

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FGTANKS	PTI No. 759-83A Special Condition 2.1	The facility did not provide results of breakthrough testing. Only records of dates that the testing occurred were provided.
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Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by January 10, 2024 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the violations occurred; an explanation of the causes and duration of the violations; whether the violations are ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violations 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 Cody Yazzie at EGLE, AQD, Kalamazoo District, at 7953 Adobe Road, Kalamazoo, Michigan 49009 or YazzieC@michigan.gov and submit a copy to Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Drug & Laboratory Disposal, Inc. 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 violations cited above and for the cooperation that was extended to me during my inspection of Drug & Laboratory Disposal, Inc. If you have any questions regarding the violations or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,



Cody Yazzie  
Environmental Engineer  
Air Quality Division  
269-312-2754

cc: Annette Switzer, EGLE  
Christopher Ethridge, EGLE  
Brad Myott, EGLE  
Jenine Camilleri, EGLE  
Monica Brothers, EGLE