

October 5, 2016

Kerry Kelly  
State of Michigan  
Department of Environmental Quality  
Southeast Michigan District Office  
2700 Donald Court  
Warren, MI 48092-2793

**RE: Response to Violation Notice**

Dear Ms. Kelly

MPW Container Management Corp. is in receipt of the Violation Notice dated September 23, 2016 resulting from the inspection of MPW's Chesterfield facility conducted by you on August 2, 2016. Please accept this letter as MPW's written response to the Violation Notice.

The Violation Notice and Activity Report from your inspection indicate that on March 30, 2014, June 16, 2014, and December 22, 2014 the reported daily average number of totes cleaned per hour on the FG Offline was 4, in excess of the 3 totes per hour limit set in Section 5.1 of Permit to Install No. 79-03A and Paragraph 10.A. of AQD No. 16-2004. Following investigation into the dates of the alleged violation and corresponding records, MPW believes the alleged violations to be a result of error in records.

Each of March 30, 2014, June 16, 2014, and December 22, 2014 were Mondays. It appears that totes that had been cleaned at the end of the day on the preceding day were not recorded until the Mondays on which the alleged violations occurred. For comparison, the average totes on the days after the alleged violation were between 1 and 2 totes per hour. This is MPW's usual average per hour, per day. On the days before the alleged violation dates the daily average was .625 totes per hour, roughly one tote less per hour than MPW's usual average. On each of June 16, 2014 and December 22, 2014, 15 totes were recorded from the FG offline between 7:00 am and 9:00am. This line generally processes 14 or fewer totes per day. Also, it is not possible for MPW's FG offline to exceed the 3 tote per hour limit with the single wash head and rinse pad set up on that particular line. The 15 totes recorded on the mornings of the alleged violations could not have been cleaned at the rates documented and were most likely cleaned the day before and not recorded on the QC report until the morning of the alleged violations.

The alleged violations are not ongoing. Following the receipt of your Violation Notice and the investigation into how the alleged violations may have occurred, MPW has alerted all employees responsible for recording times and numbers of washed units to record the dates and times totes were cleaned to the plant supervisor in addition to the QC reports. Totes are only recorded on the QC reports when they have cleared final quality control, not when the cleaning on each line is actually finished. With the improved, more specialized reporting MPW's records should have greater accuracy of how many totes went through each line on what days. Special attention will be paid to the end of shifts, especially on end of week shifts where error has been most likely to occur. These measures have been implemented and will continue to be followed on a regular basis to avoid any further reoccurrence of the alleged violations.



[www.mpwservices.com](http://www.mpwservices.com)

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1.800.827.8790

If you have any questions or require any further information please feel free to contact me.

Sincerely,

A handwritten signature in black ink, appearing to read 'C Pray', followed by the date '10/5/16' written in a similar cursive style.

Curtis Pray  
Plant Services Manager, MPW Container Management Corp.  
[cpray@mpwservices.com](mailto:cpray@mpwservices.com)  
(586) 598-0528