



GRETCHEN WHITMER
GOVERNOR

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



PHILLIP D. ROOS
DIRECTOR

March 7, 2024

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

SRN: N0656, Allegan County

Dear Brent Walter:

VIOLATION NOTICE

On January 26, 2024, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), received follow up correspondence and records to a previous violation notice sent to Drug & Laboratory Disposal, Inc. located at 331 Broad Street, Plainwell, Michigan. EGLE AQD Staff reviewed the provided records 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) number 239-10, 236-10, 759-83A, and 708-83A;

During the record review, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
FG-DLS-5-HOODS	PTI No. 239-10 Special Condition V.1	<p>The facility is required to change carbon filters when a breakthrough of 0.28 lbs per hour of required analytes are measured after the carbon filter in breakthrough testing. The following hoods had breakthrough readings that exceeded the 0.28 lbs per hour limit and the facility did not change the carbon filter as required.</p> <p>Hood 1 - April 2022, May 2022, June, 2022, July 2022, August 2022, September 2022, November 2022, December 2022, January 2023, February 2023, March 2023, April 2023, May 2023, June, 2023, July 2023, August 2023, September 2023, December 2023, and January 2024</p> <p>Hood 2 - January 2022, April 2022, May 2022, June 2022, July 2022, August 2022, September</p>

		<p>2022, November 2022, December 2022, January 2023, February 2023, March 2023, April 2023, May 2023, June 2023, July 2023, August 2023, October 2023, November 2023, December 2023, and January 2024</p> <p>Hood 4 - May 2022, July 2022, August 2022, September 2022, October 2022, November 2022, December 2022, January 2023, February 2023, March 2023, April 2023, May 2023, July 2023, August 2023, October 2023, November 2023, December 2023, and January 2024</p> <p>Hood 5 - May 2022, June 2022, July 2022, August 2022, September 2022, November 2022, December 2022, January 2023, February 2023, March 2023, April 2023, May 2023, June 2023, July 2023, August 2023, October 2023, November 2023, December 2023, and January 2024</p>
FG-DLS-5-SHRED	PTI No. 239-10 Special Condition V.1	The facility did not have influent concentration data of the analytes required for breakthrough testing. Because the facility was not measuring the influent concentrations as required the breakthrough requirements could not be determined for changing of the carbon filters.
EU-DLS-2-MILL	PTI No. 236-10 Special Condition V.1	The facility did not have influent concentration data of the analytes required for breakthrough testing. Because the facility was not measuring the influent concentrations as required the breakthrough requirements could not be determined for changing of the carbon filters.
FG-DLS-5-HOODS	PTI No. 239-10 Special Condition I.1	<p>The facility is limited to 600 lbs per year of combined VOC, acetone, methylene chloride, and tetrachloroethylene emissions for each hood in FG-DLS-5-HOODS on a 12-month rolling time period. The facility provided records that showed the facility exceeded the emission limit for the following hoods in the specified months.</p> <p>Hood 1 - January 2022, February 2022, March 2022, April 2022, May 2022, June 2022, July 2022, December 2022, January 2023, September 2023, October 2023, November 2023, December 2023, January 2024, and February 2024. The 12-month rolling emissions ranged from 603.6 lbs per year to 1,178.3 lbs per</p>

		<p>year, with April 2022 having the largest exceedance.</p> <p>Hood 2 - January 2022, February 2022, March 2022, April 2022, May 2022, June 2022, July 2022, August 2022, September 2022, October 2022, November 2022, December 2022, January 2023, February 2023, March 2023, April 2023, May 2023, June 2023, July 2023, August 2023, September 2023, October 2023, November 2023, December 2023, January 2024, and February 2024. The 12-month rolling emissions ranged from 1,562.2 lbs per year to 245,825.7 lbs per year, with February 2024 having the largest exceedance.</p> <p>Hood 5 - May 2022, June 2022, July 2022, August 2022, September 2022, October 2022, November 2022, December 2022, January 2023, February 2023, March 2023, April 2023, May 2023, June 2023, July 2023, August 2023, September 2023, October 2023, and February 2024. The 12-month rolling emissions ranged from 607.4 lbs per year to 35,882.0 lbs per year, with February 2024 having the largest exceedance.</p>
<p>FG-DLS-5-HOODS and FG-DLS-5-SHRED</p>	<p>Rule 201</p>	<p>The facility installed new equipment and relocated equipment and stacks associated with the cited flexible groups after a fire in 2015. The facility should have applied for a permit to install modification before operation of the new relocated units.</p>

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by March 28, 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.

Brent Walter
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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,

A handwritten signature in cursive script that reads "Cody Yazzie".

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