



GRETCHEN WHITMER  
GOVERNOR

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



PHILLIP D. ROOS  
DIRECTOR

October 23, 2024

VIA EMAIL

Paul Anderson, Chief Operating Officer & Vice President  
Granger Container Service  
16980 Wood Road  
Lansing, Michigan 48906

SRN: N5997, Clinton & Ingham County

Dear Paul Anderson:

**VIOLATION NOTICE**

On July 29, 2024, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of Granger Container Service located at 16980 Wood Road, Lansing, Michigan. The purpose of this inspection was to determine Granger Container Service'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 Renewable Operating Permit (ROP) number MI-ROP-N5997-2020a, Section 2.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
FGRULE287(2)(c)	Section 2, MI-ROP-N5997-2020a, Monitoring/Recordkeeping SC VI.1.a.	Actual gallons of paint used per month not being tracked. Purchase records used and averaged over several calendar months.
FGRULE287(2)(c)	Section 2, MI-ROP-N5997-2020a, Design/Equipment Parameters, SC IV.1 (emission units installed <u>before</u> 12/20/2016).	Particulate control system not properly installed.

During the on-site inspection, the AQD reviewed coating usage records from January – June 2024, which indicated that 100 gallons of paint was used per month during this time period. Granger staff explained that they took the quantity of paint purchased in 2024 (January – June) and then divided this total quantity by 6 months to get a “gallons used” per month.

This method of showing compliance with Rule 287(2)(c) does not meet the requirement established in the Rule, which requires actual usage of coating documented per month. This is a violation of FGRULE287(2)(c), SC VI.1.a. The AQD is unable to determine at this time, if Granger Container Service has stayed within the coating use limit of 200 gallons minus water per month.

During this inspection, the AQD staff noted many panel filters installed improperly: gaps were seen around the edges of several panel filters, which allows for uncontrolled paint particulate.

The paint booth was installed prior to December 20, 2016, and therefore, an exhaust system that serves only the coating spray equipment must have a properly installed, and operated particulate control system. Because the exhaust filters were not installed properly (gaps in several of the panel filters), this is a violation of FGRULE287(2)(c) for having improperly installed particulate control filters.

This has been a consistent issue at the facility: during the 2016 inspection, there were 2-3 filters that did not completely cover the exhaust openings. During the 2018 inspection there were 2 entire filter panels removed (which were reinstalled during the inspection). During the 2020 inspection, the panel filters were not installed properly – notable gaps around several of the panel filters were observed. In response to this, Granger staff posted a sign instructing Granger personnel on how to correctly install filters. During the 2022 inspection, I confirmed on-site that the sign was posted; however, although there were improvements noted with the filter installations, I also noted that there were still gaps between the filters and the exhaust openings, particularly in the corners of the exhaust openings. Filters were tucked in by Serenity Skillman during the inspection.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by November 13, 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 Michelle Luplow at EGLE, AQD, Lansing District, at 525 W. Allegan St., First Floor South, Lansing, Michigan 48933 or [LuplowM1@michigan.gov](mailto:LuplowM1@michigan.gov) and submit a copy to Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

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If Granger Container Service 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 Granger Container Service. 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,



Michelle Luplow  
Environmental Quality Analyst  
Air Quality Division  
517-294-9294

cc: Serenity Skillman, Granger  
Steven Blayer, Granger  
Annette Switzer, EGLE  
Christopher Ethridge, EGLE  
Brad Myott, EGLE  
Jenine Camilleri, EGLE  
Robert Byrnes, EGLE