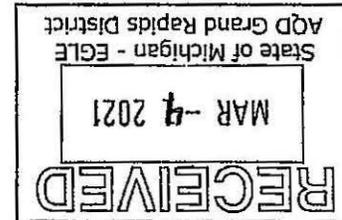




Industrial Container Services - MI, LLC  
4336 Hansen Street, SW  
Grand Rapids, MI 49548  
Phone (616) 534-9668  
Fax (616) 534-5430  
[www.mauserpackaging.com](http://www.mauserpackaging.com)

March 4, 2021

April Lazzaro  
Senior Environmental Quality Analyst  
Air Quality Division  
Michigan Department of Environmental Quality  
350 Ottawa Avenue, NW  
Unit 10  
Grand Rapids, MI 49503-2341



RE: Violation Notice August 31, 2020  
Industrial Container Services – MI, LLC  
SRN: B1715

Ms. Lazzaro,

This letter is in response to the Violation Notices dated 1/28/2021 and 2/11/2021 pertaining to a failure to properly monitor and record visible emissions from the furnace and exceeding the 6-minute average of % opacity.

The opacity meter and data logger were installed in October of 2020. And everything was set up and working in November of 2020. MI DEQ requested that the reading for the month of December 2020 be sent it to show compliance and to see everything is working correctly. Unfortunately, early January 2021 it was discovered that the datalogger was not plugged in. As a result of it not being plugged-in data was not recorded for the month of December 2020. This was not caught initially because there was some turnover with the maintenance manager position, where the company was without a maintenance manager for a month (December 2020).

Upon finding out that the datalogger was not recording ICS reached out to April Lazzaro explaining the situation. It was then decided the ICS would send the readings for a full week in 2021 to show compliance. ICS sent records for 1/6/2021 – 1/18/2021. Upon review MI DEQ discovered multiple exceedances of the 20% 6-minute averaging period.

The meter recorded opacity deviations on 1/7 (2), 1/12, and 1/17. Through ICS's investigation of the exceedances, it was found that 1/17/2021 was a Sunday and the plant was not in production during that day. This discovery brought into question if the reader was functioning correctly. In early February, we have noted that the meter has alarmed to indicate opacity over 10% when no visible emissions were present (this despite weekly calibrations).

ICS has asked our 3<sup>rd</sup> party engineering contractor to come to the site to evaluate the meter and correct any malfunctions.

Although ICS believes this might be a technical issue with the equipment used to read and/or log the data, ICS will still implement corrective actions to prevent/correct this type of issue in the future. ICS's proposed corrective actions are as follows:

- ICS management will check the previous weeks opacity readings for exceedances so we can correct the issues while they happen, and ensure ICS is not running out of compliance. Reviewing these records weekly will be a minimum requirement as management will also be reviewing the records after it was noted that the high alarm went off. This inspection/record review will be added to the Preventative maintenance and malfunction abatement plan.
- ICS management will inspect the actual datalogger itself to ensure it is plugged in and recording. ICS also plans to lock up the to prevent anyone from purposefully or accidentally unplugging the datalogger. Even after it is locked ICS will still be inspecting the datalogger to ensure it is connected. This inspection/record review will also be added to the Preventative maintenance and malfunction abatement plan. Pictures of the secured datalogger is in appendix A.

If you have any questions or comments feel free to reach out to Tyler Phillipeck at [tyler.phillipeck@mauserpackaging.com](mailto:tyler.phillipeck@mauserpackaging.com) or (513) 526-2471, or Kyle Malone at [kyle.malone@mauserpackaging.com](mailto:kyle.malone@mauserpackaging.com) or (616) 534-9668.

Regards,

Tyler Phillipeck  
Project Engineer  
Mauser Packaging Solutions

Appendix A

