



November 9, 2023

VIA E-MAIL (LazzaroA1@michigan.gov ; camilleriJ@michigan.gov)

April Lazzaro
Senior Environmental Quality Analyst
Environmental, Great Lakes, and Energy (EGLE), AQD
250 Ottawa Ave. NW, Unit 10
Grand Rapids MI 49503

**Re: Response to Violation Notice Letter received dated October 19, 2023
Industrial Container Services – MI LLC., 4336 Hansen Street SW**

Dear Ms. Lazzaro:

This letter and attachments serve as the response of Mauser Packaging Solutions (Industrial Container Services-MI LLC.) to the Environmental, Great Lakes and Energy (EGLE) Violation Notice received on October 19, 2023, regarding failure to record visible emissions from the drum reconditioning furnace on a continuous basis for a two-year period and failure to implement a Preventative Maintenance and Malfunction Abatement Plan.

Over the past two years the site has experienced management turnover in addition to supporting EHS personnel. This turnover in key staff positions has caused a gap in continuity for some of our recordkeeping activities and control procedures. This gap became evident as we investigated the issued violation notice ,addressed corrective action, and implemented fail safes to prevent re-occurrence.

Violation:

Process Description	Rule/Permit Condition Violated	Comments
Drum reconditioning furnace	PTI No. 814-91B, EUDRUMFURNACE, Special Condition No. 1.11	Failure to record visible emissions from the drum furnace on a continuous basis for a two-year period.

Response:

Upon investigation, the opacity meter was functioning within manufacturers specifications. Opacity readout and alarms were operating correctly in real time and reacted to accordingly. Data capture frequency was at 8 readings per second and was directed to a single file source causing the creation of an extremely large data file. The sheer amount of data contained within

the data file caused fragmentation issues upon accessing and the data could not be recovered in a reviewable format even with the assistance of the software supplier.

To address the data capture issue, the site has implemented the following items:

- a) Within our EHS management software system, a weekly compliance task has been generated requiring site leadership to review and upload the opacity data. The upload of the data will serve as evidence the task was completed and serves as a repository for future data access. The Plant Manager will be primarily responsible for this task however a backup has been trained to complete this task if the Plant Manager is not onsite or is unavailable. A copy of the training record for the backup is provided as **Attachment A**.
- b) Opacity meter settings have been updated to capture one reading every 10 seconds. The meter was previously capturing 8 reading every second. The updated setting will prevent the generation of a large file that could lead to file fragmentation and data loss. The weekly compliance task in (a) will also serve as a check to ensure capture frequency remains at 1 reading every 10 seconds.
- c) Redundant file backup locations (systems) are being put in place. Previously one local backup drive was utilized. With the corrective action from (a), weekly files will now be uploaded into the EHSI management system for future access. A Third cloud-based backup system is currently being sourced and will be utilized in addition to the methods described above.

Violation:

Process Description	Rule/Permit Condition Violated	Comments
Drum reconditioning furnace	Rule 911(4)	Failure to implement Malfunction Abatement Plan.

Response:

The lack of visibility and training on the Preventative Maintenance and Malfunction Abatement Plan are key root causes to its limited implementation at the site. To correct this issue and fully implement this plan, the following steps have been taken.

- a) A copy of the plan has been posted in the control area of the Drum Reclamation Furnace as to provide a quick and easy reference for affected employees.
- b) A training session was held for all affected employees to review the plan and better understand the scope and procedures within the plan. A copy of the training record is provided as **Attachment B**.

Mauser Packaging Solutions (Industrial Container Services-MI LLC.) wishes to cooperate fully with EGLE. If you have any questions after reviewing this response, please do not hesitate to contact me at (614) 448-8454 or david.boogaard@mauserpackaging.com.

Sincerely,

MAUSER PACKAGING SOLUTIONS



David Boogaard
Regional EHS Manager – Midwest, NAIP

Attachments: A: Training record Opacity Review - Backup
B: Preventative Maintenance and Malfunction Abatement Plan training record

cc: David McDonald, MPS, Plant Manager
Peter DiPasca, MPS, Environmental & Sustainability Director
Rick Capps, MPS, EHS Director
Jason Shoff, MPS, Regional Operations VP
Jenine Camilleri, EGLE, Enforcement Unit Supervisor