



RICK SNYDER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
GRAND RAPIDS DISTRICT OFFICE



C. HEIDI GREYHER  
DIRECTOR

January 24, 2017

Mr. Dan Belfer  
Industrial Container Services, LLC  
4336 Hansen SW  
Grand Rapids, Michigan 49548

SRN: B1715, Kent County

Dear Mr. Belfer:

**VIOLATION NOTICE**

On December 14, 2016, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of Industrial Container Services, LLC (ICS) located at 4336 Hansen SW, Grand Rapids, Michigan. The purpose of this inspection was to determine ICS'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 Permit to Install (PTI) numbers 874-91B and 430-83A.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
EUCOATINGLINE	PTI No. 430-83A, Special Condition 30	Failure to properly maintain record of Hazardous Air Pollutant emissions

ICS has not properly maintained acceptable records of Hazardous Air Pollutant (HAP) emissions. Specifically, a significant portion of reported emissions are for a HAP that has been delisted since 2004. In addition, several other coatings have HAP contents missing or incorrect quantities. Examples include tryethylamine, phenol and formaldehyde. Actual HAP emissions are unknown at this time.

As discussed, please provide a facility-wide Potential to Emit (PTE) demonstration for all pollutants at the source. A deadline for this information of March 3, 2017 has been agreed upon. Information on calculating PTE can be found at the following website:

<http://www.michigan.gov//deq/0,4561,7-135-3310---,00.html>

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Lastly, please submit a Malfunction Abatement/Preventative Maintenance Plan for the drum reconditioning furnace and thermal oxidizer by March 10, 2017.

Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by February 14, 2017 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the violation occurred; an explanation of the causes and duration of the violation; whether the violation is ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violation and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

If ICS 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 violation cited above and for the cooperation that was extended to me during my inspection of ICS. If you have any questions regarding the violation or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,



April Lazzaro  
Senior Environmental Quality Analyst  
Air Quality Division  
616-356-0248

cc: Ms. Heidi Hollenbach, DEQ  
cc/via e-mail: Ms. Lynn Fiedler, DEQ  
Ms. Mary Ann Dolehanty, DEQ  
Mr. Christopher Ethridge, DEQ  
Mr. Thomas Hess, DEQ