



GRETCHEN WHITMER  
GOVERNOR

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



PHILLIP D. ROOS  
DIRECTOR

October 19, 2023

David Boogaard  
Industrial Container Services - MI, LLC  
1385 Blatt Boulevard  
Gahanna, Ohio 43230

SRN: B1715, Kent County

Dear David Boogaard:

**VIOLATION NOTICE**

On October 3, 2023, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted visible emissions observations and a subsequent records review at Industrial Container Services - MI, LLC located at 4336 Hansen Street SW, Grand Rapids, Michigan. The purpose of this review was to determine Industrial Container Services - MI, LLC'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) number 814-91B.

During the records review, staff observed the following:

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.
Drum reconditioning furnace	Rule 911(4)	Failure to implement Malfunction Abatement Plan.

On October 3, 2023, visible emissions were observed reaching 60% opacity from the drum reconditioning furnace thermal oxidizer stack. While the visible emissions readings taken by AQD staff did not exceed 20% opacity on a 6-minute average, Industrial Container Services - MI, LLC was contacted via email and asked to provide the required records of visible emissions for the day for review. Following that request, the AQD learned that Industrial Container Services - MI, LLC did not have the required records. An additional request for all opacity data from January 2021 to the present was made and the response identified that from September 6, 2021, to October 4, 2023 (with the exception of 3 days), no opacity data was available.

David Boogaard  
Industrial Container Services - MI, LLC  
Page 2  
October 19, 2023

This is a violation of PTI No. 814-91B and the facility's Malfunction Abatement Plan which requires that Industrial Container Services - MI, LLC monitor and record the visible emissions from the furnace on a continuous basis.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by November 9, 2023 (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 April Lazzaro at EGLE, AQD, Grand Rapids District, at 350 Ottawa Avenue NW, Unit 10, Grand Rapids, Michigan 49503 or [LazzaroA1@michigan.gov](mailto:LazzaroA1@michigan.gov) and submit a copy to Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Industrial Container Services - MI, LLC 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 Industrial Container Services - MI, LLC. 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,



April Lazzaro  
Senior Environmental Quality Analyst  
Air Quality Division  
616-558-1092

cc: Annette Switzer, EGLE  
Christopher Ethridge, EGLE  
Brad Myott, EGLE  
Jenine Camilleri, EGLE  
Heidi Hollenbach, EGLE