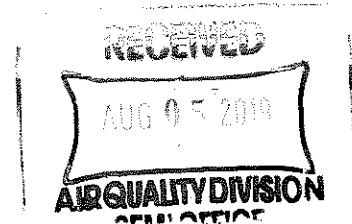


August 5, 2019

Ms. Joyce Zhu, District Supervisor
STATE OF MICHIGAN
Dept. of Environment, Great Lakes, and Energy
Air Quality Division
Southeast Michigan District Office
27700 Donaldson Ct
Warren MI 48092



Subject: Response to Violation Notice
Submittal of Additional Information
Intertape Polymer Group, Marysville, Michigan (SRN A6220)

Dear Ms. Zhu,

This correspondence is in response to the Violation Notice dated July 23, 2019 issued to Intertape Polymer Group (IPG; SRN A6220). The EGLE Violation Notice specifies three alleged deficiencies in the Renewable Operating Permit (ROP) renewal application submitted by IPG on July 12, 2019 and indicates that those deficiencies result in an application that is not administratively complete. Each alleged deficiency is addressed below along with a demonstration that the application submitted by IPG did satisfy the requirements for an administratively complete application.

Potential to Emit Calculations

The Violation Notice specifies that facility-wide criteria pollutant potential to emit calculations were not submitted with the application and references Part C, C4 of the ROP renewal application form.

Part C, C4 asks:

*Has the stationary source **added or modified** equipment since the last ROP renewal that changes the potential to emit (PTE) for criteria pollutant ... emissions?*

*If **Yes**, include potential emission calculations (or the PTI and/or ROP revision application numbers, or other references for the PTE demonstration) for the added or modified equipment on an AI-001 form.*

Part C, C4 does not ask for facility-wide potential to emit calculations as erroneously referenced in the Violation Notice. Part C, C4 specifically asks for potential emissions for the added or modified equipment and indicates that this requirement may be satisfied by providing the PTI for the new equipment that contains this information.

A new process (the coating extruder, EUWETMIXEXTRUDER) was installed subsequent to issuance of the previous ROP. IPG provided a copy of the new permit (Permit to Install 81-14) as part of the renewal application and PTI 81-14 clearly specifies a VOC emission limit

of 8.4 tons per year and PM10 emission limit of 0.315 pph (pounds per hour) for EUWETMIXEXTRUDER.

Therefore, IPG did satisfy the requirements of Part C, C4 by submitting a copy of PTI 81-14 that specifies the potential emissions for the added equipment.

The ROP renewal application submitted in 2014 for IPG was deemed administratively complete without facility-wide potential to emit calculations and it is unclear how this information would be useful or necessary for EGLE for reissuing the IPG ROP. Nonetheless, we recognize that EGLE has the authority to request the submittal of additional information as part of its technical review. If EGLE determines this to be necessary to complete its technical review of the application, IPG will provide this information upon request.

Replacement / Dismantled Emission Units

The Violation Notice specifies that Part E, E4 is marked "No" in response to whether emission units in the existing ROP had been dismantled. EGLE apparently disagreed with IPG's selection by citing that the SRS Boiler (EU-SRSBOILER) and emergency generator (EUGENERATOR) had been replaced.

Part E, E4 specifically asks *Have any emission units identified in the existing ROP been dismantled?* In the comments section of Part E of the ROP application, IPG specified that:

Both the Solvent Recovery System Boiler (EUSRSBOILER) and Emergency Generator (EUGENERATOR) have been replaced with newer units. The installation of the new equipment is exempt from Permit to Install (Rule 201) requirements. However, the installation of new units changes the applicability of 40 CFR Part 63 Subpart DDDDD (Boiler MACT) and 40 CFR Part 63 Subpart ZZZZ (RICE MACT) since these units were previously regulated as existing units under these provisions. The generator engine is now subject to 40 CFR Part 60 Subpart JJJJ (SI-RICE NSPS

As indicated by IPG in the application, the original equipment for the SRS Boiler and Generator were replaced with similar equipment. However, the emission units EUSRSBOILER and EUGENERATOR will remain in the permit. We did not consider this to be a dismantling of the emission units, which would imply that the applicant is requesting for the emission units be removed from the permit.

Information for the new SRS Boiler and Generator equipment was provided in the application (see AI-BOILERMACT and AI-RICEMACT_JJJJ) and any changes to the emission unit requirements were addressed extensively in Part H of the application forms and the Additional Information attachments. Therefore, all relevant information for these emission units was provided with the application for EGLE to perform its technical review.

There is no clear guidance or definitions provided in Michigan's Air Pollution Control Rules on whether equipment replacements should be categorized as 'dismantling'. This seems arbitrary and irrelevant to the review of the application since the actions taken by IPG were clearly explained in the application and all pertinent information was provided with the application submittal.

Nonetheless, we have modified the application form as requested.

Section F1, Permits to Install

The Violation Notice indicates that a box was not checked on Part F, F1 to the question on whether any Permits to Install have been issued to the facility that have yet been incorporated into the renewable operating permit.

Inadvertently, a box was not checked in Part F, F1, which was an oversight by the person preparing the form. However, all other information was provided in Part F, which included identification of the Permit to Install to be included in the ROP and responses for questions F2, F3, F4 and F5. Therefore, it can be reasonably inferred that the applicant intended to select the Yes box in F1.

All relevant information for the new permit (PTI 81-14) and a copy of PTI 81-14 was provided with the application for EGLE to perform its review despite the oversight in checking a box in question F1.

The application form Part F, F1 has been edited accordingly.

Administrative Completeness Determination

IPG disagrees with EGLE's assertion that the ROP application did not satisfy the requirements for being administratively complete. Michigan Air Pollution Control Rule 210(2) specifies that the application for renewal of a renewable operating permit:

... shall be considered an administratively complete application if it contains reasonable responses to all requests for information in the permit application form required by the department and a certification by a responsible official which states that, based on information and belief formed after reasonable inquiry, the statements and information in the application are true, accurate, and complete. The application form required by the department shall be consistent with the requirements of section 5507 of the act, except as provided for general renewable operating permits under R 336.1218. The application form shall also require a certification of compliance with all applicable requirements, a statement of methods used for determining compliance, including a description of monitoring, recordkeeping and reporting requirements, and test methods, and a statement indicating the stationary source's compliance status with any applicable enhanced monitoring and compliance certification requirements of the clean air act.

The renewal application provided by IPG contains the elements specified in Rule 210(2) for an administratively complete application. Detailed information was provided for any new or replacement emission units and all relevant information was submitted to EGLE for its technical review.

The criteria for being administratively complete as defined in Rule 210(2) indicates that the applicant must provide *reasonable* responses to all requests for information in the permit application form. For EGLE to maintain that an application is not administratively complete simply because the agency disagrees with which box was checked on a form, or to find a box that was inadvertently missed, does not comport with the definition provided in Rule 210(2).

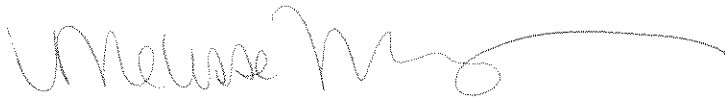
Therefore, it is IPG's position that the ROP renewal application that was submitted on July 12, 2019 does satisfy the criteria for being administratively complete as defined by Rule 210(2). IPG is requesting that EGLE reconsider its determination based on the information presented herein.

Enclosed is a revised version of the Renewable Operating Permit Renewal Application Form that includes the edits presented in this correspondence.

Please contact us should you have any questions or require additional information.

Sincerely,

INTERTAPE POLYMER GROUP

A handwritten signature in black ink, appearing to read "Melissa Oakley", with a long horizontal flourish extending to the right.

Melissa Oakley
Environmental, Health & Safety Manager

Enclosure