

August 7, 2023

Mr. Sebastian Kallumkal
Environmental Quality Specialist
EGLE AIR QUALITY DIVISION
Warren District Office
2770 Donald Ct
Warren MI 48902

**Subject: Response to Violation Notice; Boiler MACT
Intertape Polymer Group SRN A6220**

Dear Mr. Kallumkal,

Intertape Polymer Group (IPG) has prepared this response to the Violation Notice (VN) dated July 18, 2023 that was issued to the IPG facility located in Marysville, St. Clair County. Based on information provided by IPG to the Michigan Department of Environment, Great Lakes, and Energy (EGLE) Air Quality Division (AQD) in a June 29, 2023 electronic mail message, EGLE AQD is alleging that IPG operated an existing boiler (EUBLDG41BOILER) that is subject to 40 CFR Part 63 Subpart DDDDD (5D or Boiler MACT) after the applicable compliance date without the required notifications and tune up / energy assessment.

The violation specified in the VN is presented below and IPG's responses follow. The VN requested that IPG provide a response by August 8, 2023.

Specified Violation

In the VN dated July 18, 2023, EGLE AQD alleges:

EUBLDG41BOILER is an existing boiler located at a major source of HAP emissions and is subject to NESHAP 5D. IPG's compliance date for this NESHAP was no later than January 31, 2016. IPG operated this boiler until 2019, but did not comply with NESHAP 5D requirements such as initial notification, notification of compliance status, two-year tune up, initial energy assessment, etc.

Response #1; Compliance Date and Notification

EUBLDG41BOILER is a relatively small boiler (rated heat input rate of 5.2 million Btu/hr) using a gas 1 fuel (pipeline natural gas) that was in use until September 2019. Regular operation ceased in September 2019 when the new solvent recovery system boiler (SRS Boiler) was started. Since that time, EUBLDG41BOILER has been maintained as a backup unit and only operated for maintenance and tune up activities.

EUBLDG41BOILER was inadvertently overlooked during IPG's assessment of the Boiler MACT applicability. The Renewable Operating Permit issued to IPG in January 2015 only

referenced MACT applicability for boilers with a design capacity greater than 10 million Btu/hr. However, after review of the 5D requirements following EGLE AQD's inquiry, IPG acknowledges that there are requirements in the Boiler MACT that apply to boilers with a heat input rating between 5 and 10 million Btu/hr (as described in the following sections of this document) and that EUBLDG41BOILER is a subject unit that operated after the January 2016 compliance date.

Response #2; Two-Year Tune Up

40 CFR 63.7500 (e) specifies that:

... Boilers and process heaters in the units designed to burn gas 1 fuels subcategory with a heat input capacity greater than 5 million Btu per hour and less than 10 million Btu per hour must complete a tune-up every 2 years as specified in § 63.7540. Boilers and process heaters in the units designed to burn gas 1 fuels subcategory are not subject to the emission limits in Tables 1 and 2 or Tables 11 through 15 to this subpart, or the operating limits in Table 4 to this subpart.

Regular boiler maintenance service has been performed for EUBLDG41BOILER as part of IPG's preventative maintenance and equipment readiness program. This service included emission checks for the combustion system exhaust (CO, NO_x, O₂ and CO₂ measurements) and post adjustment emission checks if it was determined that adjustments were necessary. These activities are consistent with boiler tune up requirements. Third-party maintenance service and exhaust gas readings were performed annually while the boiler was in regular operation (2016 through 2019) and again in 2022 after is ceased regular operation.

The Attachment provides records of combustion test results from the boiler service company (D.J. Conley Associates, Inc.) for EUBLDG41BOILER.

Response #3; Initial Energy Assessment

According to 40 CFR 63.7510 (e), an existing affected source must perform a one-time energy assessment, as specified in 5D Table 3, by the applicable compliance date. The boiler tune-up activities performed by D.J. Conley Associates, Inc. and the reports provided in the attachments verify that the boiler is operating at a satisfactory thermal efficiency. IPG has performed other energy assessment studies for its Marysville facility that includes steam and electricity use. These do not satisfy all the energy assessment elements specified in 5D Table 3.

IPG has no plans to use EUBLDG41BOILER on a regular basis and has decided to permanently decommission this unit. The boiler will be physically disconnected and blinded from the natural gas fuel line. IPG will provide EGLE AQD with photos of the physically disconnected and blinded fuel line by August 18, 2023.

Summary of Corrective Actions

During the time that EUBLDG41BOILER was operated on a regular basis between 2016 and 2019, IPG contracted a qualified boiler service company to perform annual preventative maintenance and measure exhaust gas pollutant concentrations to verify that air pollutant emissions were within acceptable ranges, consistent with the Boiler MACT tune up requirements. These records are provided in the attachments to this document.

IPG acknowledges that it did not satisfy the initial notification and biennial reporting requirements specified in 40 CFR 63.7550 and 5D Table 9, and the requirement to perform an initial energy assessment.

EUBLDG41BOILER has not been used since September 2019 (except for starting it for maintenance / tune-up activities). IPG has decided to permanently decommission this boiler and will physically disconnect it from the natural gas fuel line. IPG will provide EGLE AQD with photos of the physically disconnected and blinded fuel line by August 18, 2023.

We appreciate EGLE AQD's review of our response to the July 18, 2023 VN and look forward to your concurrence with the proposed corrective actions. Please contact Jonathan Seals (810-941-6382; jseals@itape.com) if you have any questions or require additional information.

Sincerely,

INTERTAPE POLYMER GROUP



Brian Newman
Operations Manager

C: Jenine Camilleri, EGLE Enforcement Unit Supervisor (via e-mail)

Attachments