

November 8, 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;
EUPROCESSVESSELS and FGCOATINGPROCESS
Intertape Polymer Group SRN A6220**

Dear Mr. Kallumkal,

Intertape Polymer Group (IPG) has prepared this response to the Violation Notice (VN) dated October 23, 2023 that was issued to the IPG facility located in Marysville, St. Clair County. The violations specified in the VN are presented below and IPG's responses and corrective actions follow. The VN requested that IPG provide a response by November 13, 2023.

Specified Violation #1; Mixer #6 Dryout Step

In the VN dated October 23, 2023, the Michigan Department of Environment, Great Lakes, and Energy (EGLE) Air Quality Division (AQD) alleges:

The nitrogen dryout step for [EUPROCESSVESSELS] Mixer #6 was not vented through condenser for 10 batches during Jan-June 2023 reporting period. Similar deviations occurred during previous reporting periods.

Response #1

IPG self-reported the deviations with the semi-annual deviation report that was postmarked by the required submittal date. The exhaust from the Mixer #6 dry-out is directed to the chilled condenser for any adhesive mix batches that are shipped off-site. The 10 batches in question were all performed by one new equipment operator that did not follow IPG's procedures for proper operation of this process. This incident identified a deficiency in clarity during the new hire training process with respect to the Mixer #6 operation and the importance of dry-out initiation. IPG has updated the training program for all personnel that operate the Mixer #6 production that focuses on the "why" of the process. Additionally, IPG has updated the Mixer #6 operating procedures to boldly and specifically highlight the dry-out step. Equipment operators must now initial the batch sheet signifying that dry-out was performed.

For the current reporting period, through the end of October 2023, IPG has produced 63 regulated batches in Mixer #6 with no dry-out deviations.

Specified Violation #2; Mixer #6 Condenser Temperature

In the VN EGLE AQD alleges:

The Mixer #6 condenser did not achieve emission control standards for one day during Jan-June 2023 reporting period. Similar deviations occurred during previous reporting periods.

Response #2

The condenser temperature deviation was self-reported by IPG with the semi-annual deviation report. When the deviation was discovered by IPG the system was immediately shutdown and the cause investigated. It was determined that debris from a failed temperature unit elsewhere within the chilled water system had become lodged in the heat exchanger associated with the Mixer #6 condenser. The heat exchanger system was disassembled and flushed with a high-pressure external pump to remove the debris. Piping upstream of the heat exchanger was also cleaned as needed. After reassembly, full chilled water flow was returned to the condenser and the system operated as designed.

This was an unusual malfunction event and is considered resolved.

Specified Violation #3; Coating Line 4 Static Pressures

In the VN EGLE AQD alleges:

Facility operated [FGCOATINGPROCESS] Coating Line 3 for several days with 3-hour average static pressure for dryer 5 Zones 1 and 4 below the 3-hour operating range specified in the Capture System Monitoring Plan during Jan-June 2023 reporting period. Similar deviations occurred during previous reporting periods.

Response #3

The static pressure deviations for Coating Line 3 were self-reported by IPG with the semi-annual deviation report. IPG operates the coating line dryer zones (i.e., air collection system) within a certain tolerance of the static pressures observed during the test event. When reviewing the recorded static pressure data for the reporting period, it was discovered that the control system static pressure setpoints had not been updated for consistency with those recorded during the most recent compliance testing. This oversight was attributed to several personnel changes in the Maintenance and Environmental departments that occurred at IPG in December 2022 through March 2023. At the time of discovery (while preparing the deviation report), the correct setpoints were entered into the process control system and the number of deviations has decreased significantly following that change.

The dryers and air collection systems in question operated properly during the reporting period, however, there were periods of time when the static pressures were less than those

recorded during the most recent compliance testing because the setpoints had not been updated.

Specified Violation #4; Coating Line 4 Static Pressures

In the VN dated October 23, 2023, EGLE AQD alleges:

Facility operated [FGCOATINGPROCESS] Coating Line 4 for several days with 3-hour average static pressure for Ovens A, C1 and C2 below the 3-hour operating range specified in the Capture System Monitoring Plan during Jan-June 2023 reporting period. Similar deviations occurred during previous reporting periods.

Response #4

The static pressure deviations for Coating Line 4 were self-reported by IPG with the semi-annual deviation report. The cause and corrective action response for this item are the same as that for item #3.

Summary of Corrective Actions

IPG acknowledges the deviations specified in the October 23, 2023 VN as they are consistent with those self-reported by IPG. The apparent cause and corrective action are presented with each item in this letter. We appreciate EGLE AQD's review of our response to the October 23, 2023 VN and look forward to your concurrence with the specified 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



Jonathan A. Seals
EHS Manager, IPG

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