

DEPARTMENT OF ENVIRONMENTAL QUALITY  
AIR QUALITY DIVISION  
ACTIVITY REPORT: Scheduled Inspection

A622041094

FACILITY: Intertape Polymer Group		SRN / ID: A6220
LOCATION: 317 Kendall Avenue, MARYSVILLE		DISTRICT: Southeast Michigan
CITY: MARYSVILLE		COUNTY: SAINT CLAIR
CONTACT: Melissa Oakley , EHS Manager		ACTIVITY DATE: 07/17/2017
STAFF: Rem Pinga	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MAJOR
SUBJECT: Unannounced Level 2 Target Inspection		
RESOLVED COMPLAINTS:		

On July 17, 2017, I conducted an FCE inspection at Intertape Polymer Group (IPG) located at 317 Kendall Avenue, Marysville, Michigan. The purpose of the inspection was to determine the facility'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 administrative rules, and the facility's Clean Air Act of 1990, Title V, Renewable Operating Permit (ROP) No. MI-ROP-A6220-2015. During the inspection, I was accompanied by Ms. Melissa Oakley, EHS Manager, and current facility contact person. At the pre-inspection conference, I showed my ID Badge and stated the purpose of my visit.

The facility manufactures pressure sensitive adhesive tape products. The process of manufacturing adhesive tape involves preparation and application of an adhesive coating and a release coating to the paper or film backing of the tape, and drying/curing the tape. The adhesive manufacturing steps are batch operations while the coating application and drying operations are continuous operations. At the facility, the process consists of three primary web coating lines controlled by a vapor-phase carbon adsorption solvent recovery system and a regenerative thermal oxidizer; a pilot web coating line and R&D web coating line controlled by the regenerative thermal oxidizer; a dry stock mixing area controlled by two fabric filter collectors; a research and development spray booth; cold cleaners; and other affiliated process operations.

The primary emission units at the facility include 3 pressure sensitive tape adhesive coating lines (EU COATING LINE1, EU COATING LINE3, EU COATING LINE4), one pilot line (EU PILOT-LINE), and associated adhesive wet mix and WHIP processes (EU WET MIX & WHIP-OP) that form FG COATING LINES flexible group. The facility operates two air pollution control devices to control VOC on portions of the adhesive coating lines, namely, a vapor phase Carbon Adsorption Solvent Recovery System (SRS) and a Regenerative Thermal Oxidizer (RTO). Also, the facility operates a dry ingredient Mixer (EU COMPOUNDING) controlled by two baghouses (North and South), two 20,000 gal underground solvent storage tanks (FG STORAGE TANKS), several parts washers (soak tanks) (FG COLD CLEANERS), a permit to install exempt paint booth (FG RULE 287), and a tote cleaning process.

The facility is subject to Title 40 of the Code of Federal Regulations (CFR), Part 70, because the potential to emit Volatile Organic Compounds (VOC) exceeds 100 tons per year and the potential to emit of any single HAP regulated by the federal Clean

Air Act, Section 112, is equal to or more than 10 tons per year and/or the potential to emit of all HAPs combined is more than 25 tons per year. Hence, the facility filed an application and obtained the Clean Air Act of 1990, Title V, Renewable Operating Permit (ROP) No. MI-ROP-A6220-2015 on January 12, 2015.

Per the ROP staff activity report document, the emissions units at the stationary source are currently not subject to the Prevention of Significant Deterioration (PSD) regulations of Part 18, Prevention of Significant Deterioration of Air Quality of Act 451 or 40 CFR, Part 52.21 because the process equipment was constructed/installed prior to June 19, 1978, the promulgation date of the PSD regulations. However, the facility is currently subject to PSD regulations and any modifications of the process equipment will be subject to the PSD requirements. For now, there are no Greenhouse Gas (GHG) applicable requirements to include in the ROP. The mandatory GHG Reporting Rule under 40 CFR Part 98 is not an ROP applicable requirement and was not included in the ROP.

EU COATING LINE 1, EU COATING LINE 3, EU COATING LINE 4, EU PILOT LINE, and EU WET MIX & WHIP-OP are not subject to the New Source Performance Standards (NSPS) for Pressure Sensitive Tape and Label Surface Coating Operations promulgated in Title 40 of the Code of Federal Regulations (CFR), Part 60, Subparts A and RR. However, the same emission units are subject to the Maximum Achievable Control Technology Standards (MACT) for Paper and other Web Coating (POWC) per 40 CFR Part 63, Subparts A and JJJJ. EU WET MIX & WHIP-OP is not subject to 40 CFR Part 63, Subpart HHHHH because the source is subject to 40 CFR Part 63, Subpart JJJJ, pursuant to 40 CFR 63.7985(a)(4). The emission units (EU COATING LINE 1, EU COATING LINE 3, EU COATING LINE 4, EU PILOT-LINE, EU WET MIX & WHIP-OP) in FG-COATING PROCESS are exempt from the requirements of the Federal Compliance Assurance Monitoring (CAM) regulation under 40 CFR Part 64, for VOC and HAP limitations because the VOC and HAP limitations are addressed by 40 CFR 63, Subpart JJJJ.

The applicable requirements in the ROP No. MI-ROP-A6220-2015 are organized into emission unit, EU COMPOUNDING, and flexible groups: FG-COATING PROCESS, FG-BOILER MACT, FG-RICE MACT, FG-STORAGE TANKS, FG-RULE 290, FG-RULE 287(c), and FG-COLD CLEANERS.

EU COMPOUNDING – the mixing of dry raw materials (powder fillers) to produce dry stocks used in the manufacture of adhesive. The process is controlled by two fabric filter collector (North and South) baghouses. Per ROP No. MI-ROP-A6220-2015 (C) EU COMPUNDING (IV.1 & 2), I observed the baghouses installed with pressure drop gauges. During inspection, the process was not operating and the pressure gauges showed zero readings. Per ROP No. MI-ROP-A6220-2015 (C) EU COMPUNDING (III.1), a revised MAP was submitted. Per ROP No. MI-ROP-A6220-2015 (C) EU COMPUNDING (VI.1), Ms. Oakley submitted records showing pressure drop readings are recorded once a day. Per ROP No. MI-ROP-A6220-2015 (C)

EUCOMPUNDING (IX.1), submitted records showed maintenance is conducted at least once per calendar year.

FG-COATINGPROCESS – includes three primary adhesive tape manufacturing web coating lines and one pilot web coating line. Collectively these lines comprise the units that are subject to the Printing and Other Web Coating (POWC) MACT standard. Affiliated operations such as wet mix and whip operations are included.

The emission units are EUCOATINGLINE1, EUCOATINGLINE3, EUCOATINGLINE4, EUPILOT-LINE, and EUWETMIX&WHIP-OP. During inspection, only Lines 1 & 3 were running. Line 4 was down. Per ROP No. MI-ROP-A6220-2015 (D) FG-COATINGPROCESS (I.1), the submitted coating records showed the daily VOC emission rate averaged about 0.03 lb./lb. coating solids and less than the 4.79 lb./lb. coating solids permit limit. Per ROP No. MI-ROP-A6220-2015 (D) FG-COATINGPROCESS (I.2), the submitted records showed that the highest VOC emission rate in lb./hr. from EUPILOT-LINE for FY2016 and FY2017 to date, occurred in February 2017 at 1.38 lb./hr. and less than the 32.87 lb./hr. permit limit. Per ROP No. MI-ROP-A6220-2015 (D) FG-COATINGPROCESS (I.3), the submitted records showed that the highest VOC emission rate in tpy from EUPILOT-LINE for FY2016 was 17.32 tons and less than the 65.74 tpy permit limit. Per ROP No. MI-ROP-A6220-2015 (D) FG-COATINGPROCESS (I.4a), the submitted records showed that the highest monthly average % mass of coating solids applied was about 1.8 % in FY2016 and FY2017 to date and less than the 20% permit limit. Per ROP No. MI-ROP-A6220-2015 (D) FG-COATINGPROCESS (I.4c), the submitted records showed that the highest monthly average % of mass of coating materials applied for FY2016 and FY2017 to date was about 0.8% and less than the 4% permit limit. Per ROP No. MI-ROP-A6220-2015 (D) FG-COATINGPROCESS (III.1 & 2), the facility installed an interlock system to ensure proper operation of the RTO. Per ROP No. MI-ROP-A6220-2015 (D) FG-COATINGPROCESS (III.3a & b), I observed 1495°F temperature of the RTO during inspection and the stack test conducted last April 2017 showed an average of 98.1% VOC destruction efficiency. Per ROP No. MI-ROP-A6220-2015 (D) FG-COATINGPROCESS (III.4), a CMS chart recorder records the temperature on continuous basis. Per ROP No. MI-ROP-A6220-2015 (D) FG-COATINGPROCESS (V), stack test was conducted in April 2017. Per ROP No. MI-ROP-A6220-2015 (D) FG-COATINGPROCESS (VI), facility implements MAP, conducts monitoring and keeps records for monitoring and VOC emissions.

FG-BOILERMACT – pertains to existing boiler or process heater in the units with design capacity greater than 10 MMbtu per hour to burn gas 1 fuels subcategory. During inspection, I observed a boiler with 29291000 BTU/hr. rated capacity with install date of 12/15/1981. Per ROP No. MI-ROP-A6220-2015 (D) FG-BOILERMACT (VI.1), facility conducted annual tune-up. Per ROP No. MI-ROP-A6220-2015 (D) FG-BOILERMACT (VI.2, 3 & 4), initial compliance demonstration, tune-up, and one-time energy assessment was submitted on February 2-3, 2017.

FG-RICEMACT – pertains to existing natural gas fired, stationary, less than 500 BHP, emergency, reciprocating internal combustion engine (RICE), exempt from permit to install requirements pursuant to R 336.1285(g), located at a major source of HAP emissions and subject to 40 CFR Part 63, Subpart ZZZZ-National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines. During inspection, I observed a Generac 2000 Series emergency generator (200 KW) with date of installation of 11/24/2003 and the non-resettable hour meter = 329.00. Per Ms. Oakley, 12.7 hours were recorded for FY2016 and 2.7 hours for FY2017 to date.

FG-STORAGETANKS – pertains to two underground storage tanks used to contain recovered solvent from the carbon adsorption system. Tanks are 20,000 gallons each. Per Ms. Oakley, Toluene is being stored in these tanks. Per ROP No. MI-ROP-A6220-2015 (D) FG-STORAGETANKS (IV.1), the vapor pressure of Toluene is 0.42 psia and less than the 1.5 psia permit limit.

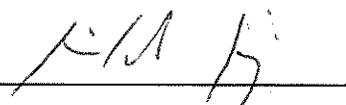
FG-RULE290 – pertains to any emission unit that emits air contaminants and is exempt from the requirements of Rule 201 pursuant to Rules 278 and 290. EURDPILOT-LINE operates under Rule 290. In FY 2016, the company reported a total of 167 lb. wet coating emitted and as of June 2017, 263 lb. wet coating emitted.

FG-RULE287(2)(c) – pertains to any emission unit that emits air contaminants and is exempt from the requirements of Rule 201 pursuant to Rules 278 and 287(2)(c). During inspection, I observed a small paint booth with filters in place. Facility keeps records of gallons of coating usage. Per ROP No. MI-ROP-A6220-2015 (D) FG-RULE287(2)(c) (II), records showed about 1.93 gallons of coating used in FY2016 and 2.04 gallons used in FY2017 through June 2017.

FG-COLDCLEANERS – pertains to any cold cleaner that is grandfathered or exempt from Rule 201 pursuant to Rule 278 and Rule 281(2)(h) or Rule 285(2)(r)(iv). Existing cold cleaners were placed into operation prior to July 1, 1979. New cold cleaners were placed into operation on or after July 1, 1979. During inspection, I observed a coldcleaner with 3'x2.5' opening dimension. Per ROP No. MI-ROP-A6220-2015 (D) FG-COLDCLEANERS (IV), the air vapor interface is less than 10 square feet and emissions are released in the in-plant environment. Per ROP No. MI-ROP-A6220-2015 (D) FG-COLDCLEANERS (VI), records were kept for each coldcleaner and written procedures were posted.

Overall, I did not find any noncompliance issues during inspection.

NAME



DATE

9/28/2017

SUPERVISOR

