



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
SOUTHEAST MICHIGAN DISTRICT OFFICE



DAN WYANT
DIRECTOR

October 4, 2013

Mr. Mike W. Roughton
Operations Manager
Intertape Polymer Group
317 Kendall Avenue
Marysville, Michigan 48040

SRN: A6220, St. Clair County

Dear Mr. Roughton:

VIOLATION NOTICE

On September 23, 2013, the Michigan Department of Environmental Quality-Air Quality Division (MDEQ-AQD) received from Intertape Polymer Group (Intertape) located at 317 Kendall Avenue, Marysville, Michigan, its Renewable Operating Permit (ROP) Semi-Annual Certification and Deviation Reports and the Semi-Annual Compliance Report for 40 CFR 63, Subpart JJJJ-National Emission Standards for Hazardous Air Pollutants: Paper and Other Web Coating (POWC) which were due by September 15, 2013. The purpose of these reports is to determine Intertape Polymer Group'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 Renewable Operating Permit (ROP) number MI-ROP-A6220-2009.

The alleged violations include the following:

Process Description	Rule/Permit Condition Violated	Comments
Intertape Polymer Group Coating Processes	MI-ROP-A6220-2009, General Condition 19 and 23, EUCOMPOUNDING, FGSTORAGETANKS, FGRULE287(c), FGCOLDCLEANERS, FGCOATINGPROCESS, Section VII, SC 1 & 2	Permittee did not submit the January 1-June 30, 2013, Renewable Operating Permit Semi-annual Report Certification by the due date of September 15, 2013.

Intertape Polymer Group Coating Processes	MI-ROP-A6220-2009 FGCOATINGPROCESS Section VII, SC 4 & 6	Permittee did not submit the January 1-June 30, 2013 Paper and Other Web Coating Industry-40 CFR 63, Subpart JJJJ-Semiannual Compliance Report by the due date of September 15, 2013.
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Furthermore, the following deficiencies were noted in the submitted reports received on September 23, 2013.

1. Renewable Operating Permit Semiannual Report Certification was not marked or dated properly.
2. The deviations reported in the ROP Semiannual Report and the "Paper and Other Web Coating Industry-40 CFR 63, Subpart JJJJ-Semiannual Compliance Report"- did not match.
3. "Paper and Other Web Coating Industry-40 CFR 63, Subpart JJJJ-Semiannual Compliance Report Certification" was not included with the submitted report.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by **October 25, 2013**. 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.

If Intertape Polymer Group 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. 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,



Sebastian G. Kallumkal
Senior Environmental Engineer
Air Quality Division
(586) 753-3738

SGK/DAC

cc/via email: Ms. Lynn Fiedler, DEQ
Ms. Teresa Seidel, DEQ
Mr. Thomas Hess, DEQ
Mr. Christopher Ethridge, DEQ