



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
SOUTHEAST MICHIGAN DISTRICT OFFICE



DAN WYANT
DIRECTOR

April 2, 2014

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

SRN: A6220, St. Clair County

Dear Mr. Roughton:

VIOLATION NOTICE

On March 17, 2014, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), received from Intertape Polymer Group located at 317 Kendall Avenue, Marysville, Michigan, its Renewable Operating Permit (ROP) Annual Certification, Semi-Annual Certifications 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 March 15, 2014. 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 |
|---------------------|---------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| FGCOATINGPROCESS | MI-ROP-A6220-2009, SC VI.14.(b) | Facility operated Coating Line 4 with the static pressure for C2 Oven below the 3-hour operating range specified in the capture system monitoring plan for several days during January, 2013 through December 2013. |
| FGCOATINGPROCESS | MI-ROP-A6220-2009, SC VI.14.(b) | Facility operated Coating Line 4 with the static pressure for C1 Oven below the 3-hour operating range specified in the capture system monitoring plan for several days during January, 2013 through December 2013. |

| | | |
|------------------|---------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| FGCOATINGPROCESS | MI-ROP-A6220-2009, SC VI.14.(b) | Facility operated Coating Line 3 with the static pressure for D5Z4 dryer below the 3-hour operating range specified in the Capture System Monitoring Plan during 11/15, 11/20, and 12/20/2013. |
|------------------|---------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

The reports show that the facility did not operate the capture system in compliance with the Capture System Monitoring Plan (Plan). The facility needs to thoroughly evaluate and address the causes of the repeated violations of the static pressure ranges for the ovens and dryers.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by April 23, 2014 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the violations occurred; an explanation of the causes and duration of the violations; whether the violation is 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