



GRETCHEN WHITMER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF  
ENVIRONMENT, GREAT LAKES, AND ENERGY  
WARREN DISTRICT OFFICE



LIESL EICHLER CLARK  
DIRECTOR

July 23, 2019

Mr. Brian Newman, Operations Manager  
Intertape Polymer Group  
317 Kendall Avenue  
Marysville, Michigan 48040

SRN: A6220, St. Clair County

Dear Mr. Newman

### VIOLATION NOTICE

On July 12, 2019, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), received the renewal application for Renewable Operating Permit (ROP) No. MI-ROP-A6220-2015a for Intertape Polymer Group located at 317 Kendall Avenue in Marysville, Michigan. The AQD staff has reviewed the application and has determined the application is not administratively complete, pursuant to Section 5507, Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended, (Act 451).

As required by Rule 210(2), this letter is to notify Intertape Polymer Group of this finding and to specify the discrepancies and all supplemental materials needed for an administratively complete application from the facility. The application is deficient for the following reason(s):

1. Part C, C4 - Facility-wide Potential to emit calculations for criteria pollutants were not included with the submitted ROP Renewal Application.
2. Part E, E4 is marked "No" in response to if any emission unit identified in the existing ROP has been dismantled. However, in the comments section of this Part E form identified that the SRS boiler and EUGENERATOR are replaced.
3. Part F, F1 - None of the boxes marked.

Please submit the above information using copies of the appropriate Renewable Operating Permit Application forms by **August 6, 2019** (14 days from the date of the letter). Certification by a Responsible Official using the Renewable Operating Permit Application C-001 (Certification) Form must be included with all submittals.

The application received by this office on July 12, 2019, which was the last day of the submittal deadline pursuant to Rule 210(9), was not administratively complete and hence not timely. As a result, this facility has failed to obtain an application shield. Operation of the process or process equipment without the benefit of the application shield constitutes a violation of Rule 210(1).

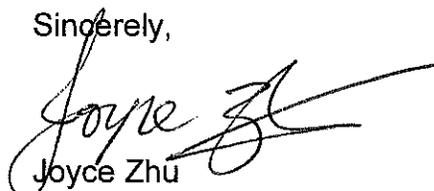
Mr. Brian Newman  
Intertape Polymer Group  
Page 2  
July 23, 2019

Furthermore, on January 12, 2020, Intertape Polymer Group ROP will expire. In accordance with Rule 217(1)(c), the source will lose its "permit shield" upon expiration of the ROP. In addition, according to Section 5506(2) of Act 451, the expiration of an operating permit terminates the person's right to operate a source. Therefore, if the ROP renewal is not issued by January 12, 2020, and this source continues to operate after this date, Intertape Polymer Group is in violation of Section 5506(2) of Act 451.

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.

The AQD may require additional information as the technical sections of the application are reviewed. If you have any questions regarding the violations or the actions necessary to bring this facility into compliance, please contact Sebastian Kallumkal at 586-753-3738, or you may contact me at the number listed below.

Sincerely,



Joyce Zhu  
Warren District Supervisor  
Air Quality Division  
586-753-3748

cc: Ms. Mary Ann Dolehanty, EGLE  
Dr. Eduardo Olaguer, EGLE  
Ms. Jenine Camilleri, EGLE  
Mr. Christopher Ethridge, EGLE  
Mr. Sebastian Kallumkal, EGLE