



GRETCHEN WHITMER
GOVERNOR

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



PHILLIP D. ROOS
DIRECTOR

October 23, 2023

Brian Newman
Intertape Polymer Group
317 Kendall Avenue
Marysville, Michigan 48040

SRN: A6220, St. Clair County

Dear Brian Newman:

VIOLATION NOTICE

On September 18, 2023, the Michigan Department of Environment, Great Lakes and Energy (ELGE), Air Quality Division (AQD), received from Intertape Polymer Group (IPG) located at 317 Kendall Avenue, Marysville, Michigan, its Renewable Operating Permit (ROP) Semi-Annual Certification and Deviation Report, the Semi-Annual Compliance Report for 40 CFR 63, Subpart HHHHH - National Emission Standards for Hazardous Air Pollutants: Miscellaneous Coating (MCM MACT) 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 MACT) which were due by September 15, 2023. The purpose of these reports is to determine IPG'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-A6220-2021.

These reports included several deviations of the MCM MACT, POWC MACT and the ROP. During the review, AQD determined that these deviations are violations of the conditions specified in the ROP.

Process Description	Rule/Permit Condition Violated	Comments
EUPROCESSVESSELS	MI-ROP-A6220-2021, EU-PROCESSVESSELS, SC III.1-3	The nitrogen dryout step for Mixer #6 was not vented through condenser for 10 batches during Jan-June 2023 reporting period. Similar deviations occurred during previous reporting periods.
EUPROCESSVESSELS	MI-ROP-A6220-2021, EU-PROCESSVESSELS, SC III.1-3	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.

FGCOATINGPROCESS	MI-ROP-A6220-2021, FGCOATINGPROCESS, SC VI.10	Facility operated 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.
FGCOATINGPROCESS	MI-ROP-A6220-2021, FGCOATINGPROCESS, SC VI.10	Facility operated 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.

The reports show that the facility did not operate the EUPROCESSVESSELS control system in compliance with 40 CFR 63, Subpart HHHHH requirements and FGCOATINGPROCESS capture system in compliance with the 40 CFR 63, Subpart JJJJ requirements. The facility needs to thoroughly evaluate and resolve the causes of the repeated violations related to the condenser controls and the static pressure ranges for the dryers and ovens.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by **November 13, 2023** (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 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.

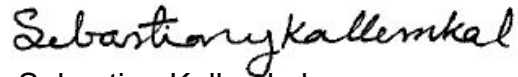
Please submit the written response to Sebastian Kallumkal at EGLE, AQD, Warren District, at 27700 Donald Court , Warren, Michigan 48092 or KallumkalS@michigan.gov and submit a copy to Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

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.

Brian Newman
Intertape Polymer Group
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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 Kallumkal
Environmental Quality Specialist
Air Quality Division
586-201-0175

cc: Jonathan Seals, IPG
Annette Switzer, EGLE
Christopher Ethridge, EGLE
Brad Myott, EGLE
Jenine Camilleri, EGLE
Joyce Zhu, EGLE