



SUMMIT POLYMERS, INC.
Plant Eight

Molded & Decorated Plastic Systems

June 21, 2022

Monica Brothers
Senior Environmental Quality Analyst
Michigan Department of Environment, Great Lakes, and Energy
Air Quality Division
Kalamazoo District Office
7953 Adobe Road
Kalamazoo, MI 49009-5025

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Ms. Brothers,

I am writing in response to the Violation Notice (VN) dated June 10, 2022. As requested in the VN, Summit Polymers, Inc. (Summit) is providing this response including: 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. The 4 violations cited in the VN, were self-reported by Summit for several instances of exceedances of the daily average VOC 5.0 lb/gal limit from PTI No. 228-04I. The duration of each of the instances was only for a single day and are not considered ongoing. The instances cited in the VN are listed below:

1. On May 6, 2021 on EU System 2 the daily average VOC #/gal minus water -exceeded 5.0#/gallon VOC. Customer demand fluctuations, resulted in the booth not being required to run any low VOC water base paint. Only two parts were coated on this day and the majority of the production was using a coating which exceeded 5 #/gal. The use of the other coating was not significant enough to lower the daily average #/gal. Summit did not have a system in place to know in real time that this was occurring. Summit would have had to paint additional parts and emit additional VOCs not necessary to be emitted to comply with the averaging. The corrective action was to have an indicator when limits were being approached.
2. On June 11, 2021 on EU System 2 the daily average exceeded 5.0 #/gallon VOC minus water. Following the instance on May 6, Summit Polymers began developing a production review process to schedule parts on the booths that would result in compliance with the daily average #/gal limit. Summit Polymers had not yet put in place the production review process that our department managers were developing. With the unbalanced production requirements we were not able to prevent the second occurrence prior to the review.
3. On February 9, 2022 on EU System 1 the daily average exceeded 5.0#/gallon VOC. The overage occurred during a service order job on this booth when no standard production was scheduled. The service run was for 82 pieces and used .35 gallons of paint and a total of only 1 pound of VOC was emitted from the booth this day.



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4. On May 18, 2022 on EU System 2 the daily average exceeded 5.0 #/gallon VOC. Summit Polymers believed that they had production scheduled appropriately to comply with the limit and was using both water_based and solvent based coatings on Eu System 2 that day. However, when Summit Polymers ran the totals for the day, the amount of water based paint sprayed was not of enough quantity to balance out below 5.0#/gallon for a 24 hour period.

We have identified the following causes.

1. EU System 2 runs a paint called twilight silver, which is a 2 component solvent based paint which is one of the few paints used by Summit which exceeds the 5.0 #/gal limit. When Summit Polymers is scheduled to use this coating, we try to schedule production in the same booth parts with a 1 component water based black, which has a 1.116 #/gallon VOC. Occurrences 1,2, and 4 had use of twilight silver without adequate balancing with the water_based black paint .
2. Our recording and calculations of the daily average of VOC for the day's production is done on the following day, which makes reacting to problems 24 hours too late.
3. Summit Polymers has seen that business with our customers recently has resulted in the use of water based paint decreasing and the use of solvent based paint increasing making averaging more difficult.

Summit Polymers Vicksburg has therefore been working on the following additional corrective actions:

1. Summit has been working with our paint supplier (Mankiewicz) to reformulate the twilight silver paint to reduce the VOC content to comply with the 5 #/gal limit. The paint has been approved by our customer (Ford) and will be in use no later than September 1, 2022. In the meantime, Summit Polymers will comply with the daily average #/gal by implementing new procedures discussed in Item 2 below.-
2. Summit Vicksburg has instituted a production monitoring screen for the day's production. Our corporate IT group is currently working on developing a system that will allow us to display the day's average VOC/gallon on the monitor so that scheduling can be managed in real time to keep below the target of 5.0#/gallon.

Summit Polymers will provide notice to EGLE when production has started full production use of the reformulated coating. In the notice, Summit will provide the recent month of VOC #/gal tracking to EGLE showing compliance with the #/gal limit. Summit Polymers is committed to Environmental Compliance and believe we have worked out a solution to this problem. Long term, Summit Polymers Vicksburg will be investigating RTO systems to use on booths with the higher VOC paints that our customers are wanting for future business. The decrease in the use of water based paints has made keeping the daily average below the 5.0 #/gallon limitation challenging. Timeline on such a RTO system is subject to customer and market demands.



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If you have any questions regarding this correspondence please contact me at 269-649-4900 ext. 68128 or email at rgippert@summitpolymers.com.

Thank you

A handwritten signature in black ink, appearing to read 'R. Gippert', is written over the typed name.

Richard Gippert
Sr. Manufacturing Engineer
Summit Polymers – Vicksburg

Cc

David Lee - General Manager Summit Polymers Vicksburg