



SUMMIT POLYMERS, INC.

**Plant 18 – 5858 East N Ave.
Kalamazoo, Michigan 49048
(269) 585-6800**

Molded & Decorated Plastic Systems -----

September 26, 2018

Ms Monica Brothers
Environmental Quality Analyst
Air Quality Division
269-567-3552

Dear Ms. Brothers,

This letter is in response to the Violation Notice received by Summit Polymers Inc. dated September 5, 2018. The violations were in contrast to conditions outlined in our Permit No. 64-17.

Violations:

- The temperature monitor for the cure oven was not being calibrated, maintained or operated properly. Accurate temperature data was not being recorded since commencement of operations in February 2018.
- The facility did not have some of the required calculations completed at the time of the inspection. Records were also difficult to decipher with multiple spreadsheets being used and some data missing or unclear. It is recommended that the facility improve their record keeping format.
- The facility was not keeping methyl isobutyl ketone or PCBT at the time of the inspection.

Causes of violation:

- The calibration record for the Dickson unit that was installed during the construction of the paint booth at Plant 18 was misplaced and therefore, there was no record of calibration. The unit was also not installed properly to record ambient temperature data per the permit requirements.
- The monthly usage data for Plant 18 was erroneously being input into the tracking form created for permit No. 70-14A which was the form created for the previous plant rather than the form created for permit 64-17. Both tracking forms were stored in the same folder. Permit 70-14A did not require the tracking of PCBT and methyl isobutyl ketone.

Summary of actions taken to correct violation:

- The Dickson unit was replaced on July 20, 2018 and the record of calibration was retained and entered into Preventative Maintenance system for annual calibration. The unit is installed and actively capturing ambient temperature data per our permit requirements. See attached printout of temperatures for August 14, 2018 – September 26, 2018.
- The electronic folders for tracking have been reorganized and separated by year and Permit No.
- Summit Polymers, Plant 18 utilizes two separate excel files to summarize all of the data required per our permit no. 64-17. VOC and HAP's usage is tracked monthly with one excel file. The 5 lb. daily VOC calculation is tracked daily in a separate excel file.
- Usage data was transferred into the correct file for Permit No. 64-17. The updated file was emailed to Ms. Brothers on August 17, 2018. See attached copy of current file.

Sincerely,



Dan Brown
General Manager
Summit Polymers, Inc.
Pavilion Plant 18

Cc: Ms. Jenine Camilleri, DEQ Enforcement Unit
Mr Dennis Bateman, SPI
Ms Amanda Crux, SPI