



Summit Polymers

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AQD - KALAMAZOO

October 5, 2022

Ms Monica Brothers
Sr. Environmental Quality Analyst
Air Quality Division
269-312-2535

Dear Ms Brothers,

This letter is in response to the Violation Notice received by Summit Polymers Inc. dated September 15, 2022. The violation noted was the facility did not have cure oven temperature records, and the temperature of Section 1 of the cure oven was in exceedance of our permit at the time of inspection. Additionally, the facility could not provide acceptable 12 month rolling emission calculations. Lastly, the facility exceeded the usage limit for Group 4 coatings.

Dates of violation:

- PTI No. 64-17A was issued on July 31, 2019. Special conditions to keep continuous records of the cure oven temperature, not to exceed 15-minute intervals.
- PTI No. 64-17A was issued on July 31, 2019. Special conditions to keep sufficient records for the facility emissions on a 12-month rolling time-period as determined at the end of each calendar month.
- PTI No. 64-17A was issued on July 31, 2019. Special conditions to limit the annual usage limit within Material Coatings Groups 1-5 based on a 12-month rolling time frame to be determined at the end of each calendar month.

Causes of violation:

- The Dickson Temperature Monitor installed in the paint booth oven failed. The failure was not caught during the monthly verification performed by the company designate.
- The record keeping of the facility emissions was being updated each calendar month. However, the prior month records were not being retained. The record on file showed the most current month data.
- During the 4th Quarter of 2021 the paint used on a primary program changed from a Group 3 coating to a Group 4 coating. A review of the impact to the facility VOC limits was conducted concluding that the facility was not at risk of exceeding the permit. However, the review of the impact on the coating group limits was not taken into consideration.

Pavilion Plant 5858 E N Ave, Kalamazoo, MI 49048



Summary of actions taken to correct violation:

- The oven is setup to remain at a steady ambient temperature using heaters that fluctuate in temperature based off high and low set points. While a heater was out during the DEQ visit, the system also had a high point set at 194. The set point has been changed to 190, so the system has time to react and cool down, not exceeding 194 degrees. In addition, the Dickson Temperature Monitor is working correctly, and a monthly PM has been setup in the Preventative Maintenance System showing an action is due. Each month 15-minute interval ambient temperature readings are being observed and saved. Additional temperature monitoring and control hardware improvements are being investigated to make this process more robust & automated.
- 12 month rolling calculations are being saved monthly as a record of usage throughout the calendar year. 2022 has already been corrected and we have record today of each month usage based on a rolling 12-month period.
- Summit Polymers has contracted with Fishbeck Engineering to assist in modifying the facility permit for Group Coating limits based on our revised calculations for usage. This process is estimated by Fishbeck to be completed by the end of October 2022. We have added a component to the VOC monthly tracking document to capture our Group Coatings that will allow us to observe and predict if we are close to or exceeding our permit limits, monthly.

Sincerely,

Jody Flinton
General Manager, Summit Polymers Pavilion Plant