



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
KALAMAZOO DISTRICT OFFICE



C. HEIDI GREYER
DIRECTOR

September 5, 2018

Mr. Dan Brown
Summit Polymers
5858 East North Avenue
Kalamazoo, Michigan 49048

SRN: P0815, Kalamazoo County

Dear Mr. Brown:

VIOLATION NOTICE

On July 19, 2018, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of Summit Polymers-Plant 18 (Facility), located at 5858 East North Avenue, Kalamazoo, Michigan. The purpose of this inspection was to determine the Facility'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 Air Pollution Control Rules; and the conditions of Permit to Install (PTI) No. 64-17.

During the inspection, staff of the AQD observed the following:

Process Description	Rule/Permit Condition Violated	Comments
EUCOATING: Coating booth with one primer booth, two top-coat booths, flame treating process, flash-off areas, and electric IR cure oven.	PTI No. 64-17 Special Condition IV.3 and VI.2	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.
EUCOATING: Coating booth with one primer booth, two top-coat booths, flame treating process, flash-off areas, and electric IR cure oven.	PTI No. 64-17 Special Condition VI.1	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 recordkeeping format.
EUCOATING: Coating booth with one primer booth, two top-coat booths, flame treating process, flash-off areas, and electric IR cure oven.	PTI No. 64-17 Special Condition VI.5	The Facility was not keeping track of PCBT at the time of inspection
EUCOATING: Coating booth with one primer booth, two top-coat booths, flame treating process, flash-off areas, and electric IR cure oven.	PTI No. 64-17 Special Condition VI.6	The Facility was not keeping methyl isobutyl ketone or PCBT records at the time of the inspection.
FGFACILITY	PTI No. 64-17 Special Condition VI.1	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 recordkeeping format.
FGFACILITY	PTI No. 64-17 Special Condition VI.3	The Facility was not keeping track of methyl isobutyl ketone or PCBT or at the time of inspection.
FGFACILITY	PTI No. 64-17 Special Condition VI.4	The Facility did not have these records at the time of inspection.

At the time of the inspection, the Facility did not have many of the required records. The records were also disorganized, sometimes erroneous, and difficult to decipher. The DEQ requests that the Facility improve their recordkeeping format and understandability of their calculations.

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Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by September 26, 2018 (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 the DEQ, AQD, 7953 Adobe Road, Kalamazoo, Michigan 49009; and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor, DEQ, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If the Facility 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.

Thank you for your attention to resolving the violations cited above and for the cooperation that was extended to me during my inspection of the Facility. If you have any questions regarding the violations or the actions necessary to bring this Facility into compliance, please contact me at the telephone number listed below.

Sincerely,



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

MB:CF

Enclosure

cc: Mr. Joe Winston, Summit Polymers
Ms. Mary Ann Dolehanty, DEQ
Mr. Craig Fitzner, DEQ
Mr. Christopher Ethridge, DEQ
Ms. Jenine Camilleri, DEQ
Ms. Mary Douglas, DEQ