App #202400059

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EGLE Michigan Department of Environment, Great Lakes, and Energy - Air Quality Division

APR 25 2024

AIR QUALITY DIVISION
WARREN DO

RENEWABLE OPERATING PERMIT APPLICATION
C-001: CERTIFICATION

This information is required by Article II, Chapter 1, part 55 (Air Pollution Control) of P.A. 451 of 1994, as amended, and the Federal Clean Air Act of 1990. Failure to provide this information may result in civil and/or criminal penalties. Please type or print clearly.

This form is completed and included as part of Renewable Operating Permit (ROP) initial and renewal applications, notifications of change, amendments, modifications, and additional information.

Form Type **C-001**	SRN A6220

Stationary Source Name	Intertape Polymer Group	
City	Marysville	County St. Clair

SUBMITTAL CERTIFICATION INFORMATION

1. Type of Submittal *Check only one box.*

☐ Initial Application (Rule 210) ☒ Notification / Administrative Amendment / Modification (Rules 215/216)

☐ Renewal (Rule 210) ☐ Other, describe on AI-001

2. If this ROP has more than one Section, list the Section(s) that this Certification applies to ____

3. Submittal Media ☐ E-mail ☐ FTP ☐ Disk ☒ Paper

4. Operator's Additional Information ID - Create an Additional Information (AI) ID that is used to provide supplemental information on AI-001 regarding a submittal.

AI

CONTACT INFORMATION

Contact Name	Jonathan Seals	Title	EH&S Manager
Phone number	810-941-6382	E-mail address	jseals@itape.com

This form must be signed and dated by a Responsible Official.

Responsible Official Name	Nathan Reynolds	Title	Operations Manager

Mailing address 317 Kendall Ave

City	Marysville	State	MI	ZIP Code	48040	County	St. Clair	Country	USA

As a Responsible Official, I certify that, based on information and belief formed after reasonable inquiry, the statements and information in this submittal are true, accurate and complete.

Nathan R. Reynolds — Signature of Responsible Official

2024-04-23 — Date

App #202400059

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Michigan Department of Environment, Great Lakes, and Energy
Air Quality Division

RENEWABLE OPERATING PERMIT
M-001: RULE 215 CHANGE NOTIFICATION
RULE 216 AMENDMENT/MODIFICATION APPLICATION

This information is required by Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended, and the Federal Clean Air Act of 1990. Failure to obtain a permit required by Part 55 may result in penalties and/or imprisonment.

1. SRN A6220	2. ROP Number MI-ROP-A6220-2021	3. County St Clair
4. Stationary Source Name Intertape Polymer Group		
5. Location Address 317 Kendall Ave		6. City Marysville

7. Submittal Type - *The submittal must meet the criteria for the box checked below. Check only one box. Attach a mark-up of the affected ROP pages for applications for Rule 216 changes.*

- ☐ **Rule 215(1) Notification of change.** *Complete Items 8 – 10 and 14*
- ☐ **Rule 215(2) Notification of change.** *Complete Items 8 – 10 and 14*
- ☐ **Rule 215(3) Notification of change.** *Complete Items 8 – 11 and 14*
- ☐ **Rule 215(5) Notification of change.** *Complete Items 8 – 10 and 14*
- ☐ **Rule 216(1)(a)(i)-(iv) Administrative Amendment.** *Complete Items 8 – 10 and 14*
- ☐ **Rule 216(1)(a)(v) Administrative Amendment.** *Complete Items 8 – 14. Results of testing, monitoring & recordkeeping must be submitted. See detailed instructions.*
- ☐ **Rule 216(2) Minor Modification.** *Complete Items 8 – 12 and 14*
- ☒ **Rule 216(3) Significant Modification.** *Complete Items 8 – 12 and 14, and provide any additional information needed on ROP application forms. See detailed instructions.*
- ☐ **Rule 216(4) State-Only Modification.** *Complete Items 8 – 12 and 14*

8. Effective date of the change. (MM/DD/YYYY) *See detailed instructions.* 04 / 19 / 2024	9. Change in emissions? ☐ Yes ☒ No

10. Description of Change - *Describe any changes or additions to the ROP, including any changes in emissions and/or pollutants that will occur. If additional space is needed, complete an Additional Information form (AI-001).*
IPG requests that references to monitoring static pressures for the stations controlled by the solvent recovery system (SRS) be removed from the permit. The performance indicator for the SRS is based on the calculated solvent recovery efficiency. The applicable procedures are already specified in the permit.

11. New Source Review Permit(s) to Install (PTI) associated with this application? ☐ Yes ☒ No
If Yes, enter the PTI Number(s) ____ ____ ____ ____ ____

12. Compliance Status - *A narrative compliance plan, including a schedule for compliance, must be submitted using an AI-001 if any of the following are checked No.*

a. Is the change identified above in compliance with the associated applicable requirement(s)? ☒ Yes ☐ No

b. Will the change identified above continue to be in compliance with the associated applicable requirement(s)? ☒ Yes ☐ No

c. If the change includes a future applicable requirement(s), will timely compliance be achieved? ☐ Yes ☐ No

13. Operator's Additional Information ID - *Create an Additional Information (AI) ID for the associated AI-001 form used to provide supplemental information.* **AI** SRS_Recovery

14. Contact Name	Telephone No.	E-mail Address
Jonathan Seals	810-941-6382	jseals@itape.com

15. This submittal also updates the ROP renewal application submitted on ____/____/____ ☐ Yes ☐ N/A
(If yes, a mark-up of the affected pages of the ROP must be attached.)

NOTE: A CERTIFICATION FORM (C-001) SIGNED BY A RESPONSIBLE OFFICIAL MUST ACCOMPANY ALL SUBMITTALS

Michigan Department of Environment, Great Lakes, and Energy - Air Quality Division

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RENEWABLE OPERATING PERMIT APPLICATION
AI-001: ADDITIONAL INFORMATION

This information is required by Article II, Chapter 1, Part 55 (Air Pollution Control) of P.A. 451 of 1994, as amended, and the Federal Clean Air Act of 1990. Failure to obtain a permit required by Part 55 may result in penalties and/or imprisonment. Please type or print clearly. Refer to instructions for additional information to complete this form.

SRN: A6220	Section Number (if applicable):

1. Additional Information ID
AI- SRS_Recovery

Additional Information

2. Is This Information Confidential? ☐ Yes ☒ No

In the current version of MI-ROP-A6220-2021, FG-COATINGPROCESS condition VI.16 states ... evaluate the capture efficiency of the capture system by monitoring the static pressure at the exhaust fan inlet for each hood and dryer or oven zone controlled by the SRS. The static pressure shall be kept at a value greater than 75% of the static pressure established during the most recent capture efficiency performance test.

This condition did not appear in the previous version of the ROP and was added during the most recent permit renewal. However, Intertape Polymer Group (IPG) evaluates the performance of its solvent recovery system (SRS) based on the calculated recovery efficiency. Condition VI.13 already specifies ... **daily recovery efficiency calculations shall be used as an indicator of proper operation of the SRS ... SRS recovery efficiency shall be maintained above 75.2%**, and Condition VI.14 specifies requirements for the solvent recovery flowmeter.

The performance indicator for SRS is the recovery efficiency calculations. If the SRS data and calculations indicate good performance, then the static pressure in the hoods is immaterial since the system is operating as intended as verified by the recovery efficiency calculations. However, if the solvent recovery performance is low, then the facility investigates the cause whether that be the collection hoods or the carbon adsorption system.

Attached are relevant excerpts from MI-ROP-A6220-2021 indicating the conditions that IPG requests to be modified or removed.

The monitoring plan that was submitted to MDEQ/EGLE, and to our knowledge approved by the regulatory agency, only included static pressure monitoring for the thermal oxidizer controlled hoods and ovens; it did not include static pressure monitoring for the SRS controlled units. The monitoring plan did include procedures for recording recovered solvent volume and determining solvent recovery efficiency based on a liquid material balance.

In MI-ROP-A6220-2021, the underlining applicable requirements (UAR) specified for these conditions are 40 CFR §64.3(a)(2), §64.6(c)(1)(iii), and §63.3350(f).

40 CFR §64.3 and §64.6 refer to Compliance Assurance Monitoring (CAM) provisions. The specific references relate to establishing ranges or conditions that indicate proper control device performance and approval of monitoring plans. The CAM Plan submitted to MDEQ/EGLE in 2019 included static pressure monitoring for the thermal oxidizer controlled hoods and ovens; it did not include static pressure monitoring for the SRS controlled units. The CAM Plan did include procedures for recording recovered solvent volume and determining solvent recovery efficiency based on a liquid material balance.

40 CFR §63.3350(f) specifies conditions for capture efficiency monitoring. However, this reference is applicable to the thermal oxidizer controlled stations and is not the most appropriate reference for the SRS controlled stations. 40 CFR §63.3350(d) specifies monitoring that is specific for solvent recovery units. IPG complies with paragraph (d)(2) using the liquid-liquid material balance and any solvent that is not captured to the thermal oxidizer. Attached are relevant excerpts from 40 CFR §63.3350.

Michigan Department of Environment, Great Lakes, and Energy - Air Quality Division

EGLE

RENEWABLE OPERATING PERMIT APPLICATION
AI-001: ADDITIONAL INFORMATION

This information is required by Article II, Chapter 1, Part 55 (Air Pollution Control) of P.A. 451 of 1994, as amended, and the Federal Clean Air Act of 1990. Failure to obtain a permit required by Part 55 may result in penalties and/or imprisonment. Please type or print clearly. Refer to instructions for additional information to complete this form.

SRN: A6220	Section Number (if applicable):

1. Additional Information ID
AI- ROP_Red_Line

Additional Information

2. Is This Information Confidential? ☐ Yes ☒ No

Attached are relevant excerpts from MI-ROP-A6220-2021 indicating the conditions that IPG requests to be modified or removed.

Red Line Edts

App #202400059

MICHIGAN DEPARTMENT OF ENVIRONMENT, GREAT LAKES, AND ENERGY
AIR QUALITY DIVISION

EFFECTIVE DATE: September 29, 2021

ISSUED TO

Intertape Polymer Group

State Registration Number (SRN): A6220

LOCATED AT

317 Kendall Avenue, Marysville, Saint Clair County, Michigan 48040

RENEWABLE OPERATING PERMIT

Permit Number: MI-ROP-A6220-2021

Expiration Date: September 29, 2026

Administratively Complete ROP Renewal Application
Due Between March 29, 2025 and March 29, 2026

This Renewable Operating Permit (ROP) is issued in accordance with and subject to Section 5506(3) of Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451). Pursuant to Rule 210(1) of the administrative rules promulgated under Act 451, this ROP constitutes the permittee's authority to operate the stationary source identified above in accordance with the general conditions, special conditions and attachments contained herein. Operation of the stationary source and all emission units listed in the permit are subject to all applicable future or amended rules and regulations pursuant to Act 451 and the federal Clean Air Act.

SOURCE-WIDE PERMIT TO INSTALL

Permit Number: MI-PTI-A6220-2021

This Permit to Install (PTI) is issued in accordance with and subject to Section 5505(1) of Act 451. Pursuant to Rule 214a of the administrative rules promulgated under Act 451, the terms and conditions herein, identified by the underlying applicable requirement citation of Rule 201(1)(a), constitute a federally enforceable PTI. The PTI terms and conditions do not expire and remain in effect unless the criteria of Rule 201(6) are met. Operation of all emission units identified in the PTI is subject to all applicable future or amended rules and regulations pursuant to Act 451 and the federal Clean Air Act.

Michigan Department of Environment, Great Lakes, and Energy

10/1/21

District Supervisor

2. To determine compliance with 40 CFR Part 63, Subpart JJJJ, the permittee shall determine the VOC content of any non-waterborne coating, as applied, using manufacturer's formulation data, federal Reference Test Method 24, federal Reference Test Method 311, or other EPA approved reference method. The permittee may modify Method 24, as approved by EPA during previous performance testing at the facility. Random testing of coatings used on EGCOATINGLINE1, EGCOATINGLINE3, EGCOATINGLINE4 and EGPILOT-LINE shall be conducted on a yearly basis with all coatings tested within a five-year period. If more than one value is available for the VOC content of a coating, the permittee shall use the higher value to determine compliance until new data is available as a result of a change in the coating formulation. **(R336.1213(3))**

3. During the performance test, the permittee shall monitor and set ranges for static pressures of the work stations, cure zone oven vents and dryer vents to show continued compliance of the capture efficiencies of RTO Control System ~~and SRS Control System~~. **(R336.1213(3), (40 CFR 63.3350(f))**

4. The permittee shall test the purity of collected solvent (%water, % VOC solvent, % HAP Solvent) from the solvent recovery system, on a semi-annual basis. **(R336.1213(3))**

See Appendix 5

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. **(R 336.1213(3)(b)(ii))**

1. The permittee shall keep separate records of the daily usage rate of all materials used in EU-COATINGLINE1, EU-COATINGLINE3, and EU-COATINGLINE4. **(R 336.1213(3))**

2. For FG-COATINGPROCESS the permittee shall calculate and record the pounds of VOC per gallon of applied coating solids on each coating line, based on a 24-hour averaging period. **(R 336.1213(3), R 336.1610), (R336.2040(12)(f))**

3. For EU-PILOT-LINE, the permittee shall calculate and record the pound per hour emission rates for VOC on a monthly basis using monthly operating hours and coating usage data. **(R 336.1213(3))**

4. For EU-PILOT-LINE, the permittee shall calculate and record the ton per year emission rates for VOCs, based on a 12-month rolling time period, as determined at the end of each calendar month. **(R 336.1213(3))**

5. The permittee shall equip and maintain an alarm for EU-COATINGLINE1 and E-UCOATINGLINE4 which will sound if exhaust gases are not vented to the RTO when the LEL in the A-unit oven exceeds 10%. **(R336.1213(3), R 336.1901)**

6. The permittee shall continuously monitor the lower explosive level (LEL) in the A-unit ovens on EU-COATINGLINE1 and EU-COATINGLINE4 with instrumentation and methods approved by the AQD District Supervisor. **(R 336.1213(3), R 336.1901)**

7. The permittee shall continuously monitor combustion chamber temperature and record every 15 minutes for a three-hour block average as an indicator of proper operation (adequate destruction efficiency) of the RTO. The indicator range is a three-hour block average temperature maintained above 1444°F, or the temperature value established in the most recent stack test. **(40 CFR 64.6(c)(1)(i) and (ii))**

8. The temperature monitor shall continuously monitor the combustion chamber temperature. The averaging period is based on a three-hour block average. The permanently installed thermocouples shall be calibrated annually or according to the MAP, if more frequent. **(40 CFR 64.6(c)(1)(iii))**

9. An excursion is a three-hour block average RTO combustion temperature below 1444°F, or the temperature value established in the most recent stack test. **(40 CFR 64.6(c)(2))**

10. The permittee shall evaluate the capture efficiency of the capture system by monitoring the static pressure at the exhaust fan inlet for each hood and dryer or oven zone controlled by the RTO. This shall be monitored continuously and recorded at 15-minute intervals on a data acquisition system. The static pressure shall be kept

at a value greater than 75% of the static pressure established during the most recent capture efficiency performance test. An excursion is defined as a static pressure reading below 75% of the value determined during the most recent capture efficiency performance test. **(40 CFR 64.3(a)(2))**

11. The pressure gauge shall monitor the static pressure at the exhaust fan inlets for each hood and dryer or oven zone exhausted to the RTO. The pressure gauges shall be calibrated annually or according to the MAP, if more frequent. **(40 CFR 64.6(c)(1)(iii))**

12. An excursion is defined as a static pressure reading below 75% of the value determined during the most recent capture efficiency performance test. **(40 CFR 64.6(c)(2))**

13. The permittee shall monitor the amount of daily VOC solvent usage and solvent recovery to calculate the recovery efficiency of the SRS on a daily basis by monitoring the difference between the amount of solvent used on the coating lines directed to the SRS and the amount of solvent recovered as measured by the SRS flow meters. These daily recovery efficiency calculations shall be used as an indicator of proper operation of the SRS. The 30-day rolling SRS recovery efficiency shall be maintained above 75.2%. An excursion is defined as a 30-day rolling SRS recovery efficiency below 75.2%. **(40 CFR 64.6(c)(1)(i) and (ii)), (40 CFR 64.6(c)(2))**

14. The solvent flowmeters in the SRS shall continuously monitor the amount of hydrocarbon solvent recovered by the SRS. The solvent flowmeter shall be calibrated annually or according to the MAP, if more frequent. **(40 CFR 64.6(c)(1)(iii))**

15. For each control device in operation, the permittee shall conduct bypass monitoring for each bypass line such that the valve or closure method cannot be opened without creating an alarm condition for which a record shall be made. Records of the bypass line that was opened and the length of time the bypass line was opened shall be kept on file. **(40 CFR 64.3(a)(2))**

16. ~~The permittee shall evaluate the capture efficiency of the capture system by monitoring the static pressure at the exhaust fan inlet for each hood and dryer or oven zone controlled by the SRS. This shall be monitored continuously and recorded at 15-minute intervals on a data acquisition system. The static pressure shall be kept at a value greater than 75% of the static pressure established during the most recent capture efficiency performance test. An excursion is defined as a static pressure reading below 75% of the value determined during the most recent capture efficiency performance test. (40 CFR 64.3(a)(2))~~

17. ~~The pressure gauge shall monitor the static pressure at the exhaust fan inlets for each hood and dryer or oven zone exhausted to the SRS. The pressure gauges shall be calibrated annually or according to the MAP, if more frequent. (40 CFR 64.6(c)(1)(iii))~~

18. Except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), the owner or operator shall conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times that the pollutant-specific emissions unit is operating. Data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities shall not be used for purposes of this part, including data averages and calculations or fulfilling a minimum data availability requirement, if applicable. The owner or operator shall use all the data collected during all other periods in assessing the operation of the control device and associated control system. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions. **(40 CFR 64.6(c)(3), 40 CFR 64.7(c))**

19. Upon detecting an excursion or exceedance, the owner or operator shall restore operation of the pollutant specific emissions unit (including the control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). See Appendix 3 for the corrective action plan. **(40 CFR 64.7(d))**

Michigan Department of Environment, Great Lakes, and Energy - Air Quality Division

EGLE

RENEWABLE OPERATING PERMIT APPLICATION
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SRN: A6220	Section Number (if applicable):

1. Additional Information ID
AI- 40_CFR_63.3350

Additional Information

2. Is This Information Confidential? ☐ Yes ☒ No

40 CFR §63.3350(d) specifies monitoring that is specific for solvent recovery units. IPG complies with paragraph (d)(2) using the liquid-liquid material balance and any solvent that is not captured to the thermal oxidizer. Attached are relevant excerpts from 40 CFR §63.3350.

shutdown. You may not conduct performance tests during periods of malfunction. You must record information that is necessary to document emission capture system and add-on control device operating conditions during the test and explain why the conditions represent normal operation.

(d) Table 2 to this subpart specifies the provisions of subpart A of this part that apply if you are subject to subpart JJJJ.

[85 FR 41296, July 9, 2020]

§ 63.3350 If I use a control device to comply with the emission standards, what monitoring must I do?

(a) A summary of monitoring you must do follows:

If you operate a web coating line, and have the following:	Then you must:
(1) Intermittently-controlled work stations	Record parameters related to possible exhaust flow bypass of control device and to coating use (§ 63.3350(c)).
(2) Solvent recovery unit	Operate continuous emission monitoring system and perform quarterly audits or determine volatile matter recovered and conduct a liquid-liquid material balance (§ 63.3350(d)).
(3) Control Device	Operate continuous parameter monitoring system (§ 63.3350(e)).
(4) Capture system	Monitor capture system operating parameter (§ 63.3350(f)).

(b) Following the date on which the initial or periodic performance test of a control device is completed to demonstrate continuing compliance with the standards, you must monitor and inspect each capture system and each control device used to comply with § 63.3320. You must install and operate the monitoring equipment as specified in paragraphs (c) and (f) of this section.

(c) *Bypass and coating use monitoring.* If you own or operate web coating lines with intermittently-controlled work stations, you must monitor bypasses of the control device and the mass of each coating material applied at the work station during any such bypass. If using a control device for complying with the requirements of this subpart, you must demonstrate that any coating material applied on a never-controlled work station or an intermittently-controlled work station operated in bypass mode is allowed in your compliance demonstration according to § 63.3370(o) and (p). The bypass monitoring must be conducted using at least one of the procedures in paragraphs (c)(1) through (4) of this section for each work station and associated dryer.

(1) *Flow control position indicator.* Install, calibrate, maintain, and operate according to the manufacturer's specifications a flow control position indicator that provides a record indicating whether the exhaust stream from the dryer was directed to the control device or was diverted from the control device. The time and flow control position must be recorded at least once per hour as well as every time the flow direction is changed. A flow control position indicator must be installed

in the event of such a diversion.

(d) *Solvent recovery unit.* If you own or operate a solvent recovery unit to comply with § 63.3320, you must meet the requirements in either paragraph (d)(1) or (2) of this section depending on how control efficiency is determined.

(1) *Continuous emission monitoring system (CEMS).* If you are demonstrating compliance with the emission standards in § 63.3320 through continuous emission monitoring of a control device, you must install, calibrate, operate, and maintain the CEMS according to paragraphs (d)(1)(i) through (iii) of this section.

(i) Measure the total organic volatile matter mass flow rate at both the control device inlet and the outlet such that the reduction efficiency can be determined. Each continuous emission monitor must comply with performance specification 6, 8, or 9 of 40 CFR part 60, appendix B, as appropriate.

(ii) You must follow the quality assurance procedures in procedure 1, appendix F of 40 CFR part 60. In conducting the quarterly audits of the monitors as required by procedure 1, appendix F, you must use compounds representative of the gaseous emission stream being controlled.

(iii) You must have valid data from at least 90 percent of the hours when the process is operated. Invalid or missing data should be reported as a deviation in the semiannual compliance report.

(2) *Liquid-liquid material balance.* If you are demonstrating compliance with the emission standards in § 63.3320 through liquid-liquid material balance, you must install, calibrate, maintain, and operate according to the manufacturer's specifications a device that indicates the cumulative amount of volatile matter recovered by the solvent recovery device on a monthly basis. The device must be certified by the manufacturer to be accurate to within ±2.0 percent by mass.

(e) *Continuous parameter monitoring system (CPMS).* If you are using a control device to comply with the emission standards in § 63.3320, you must install, operate, and maintain each CPMS specified in paragraphs (e)(10) and (11) and (f) of this section according to the requirements in paragraphs (e)(1) through (9) of this section. You must install, operate, and maintain each CPMS specified in paragraph (c) of this section according to paragraphs (e)(5) through (8) of this section.

(1) Each CPMS must complete a minimum of one cycle of operation for each successive 15-minute period. You must have a minimum of four equally spaced successive cycles of CPMS operation to have a valid hour of data.

(2) You must have valid data from at least 90 percent of the hours when the process operated.

(3) You must determine the hourly average of all recorded readings according to paragraphs (e)(3)(i) and (ii) of this section.

(i) To calculate a valid hourly value, you must have at least three of four equally spaced data values from that hour from a continuous monitoring system (CMS) that is not out-of-control.

(ii) Provided all of the readings recorded in accordance with paragraph (e)(3) of this section clearly demonstrate continuous compliance with the standard that applies to