



GRETCHEN WHITMER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF  
ENVIRONMENT, GREAT LAKES, AND ENERGY

LANSING



LIESL EICHLER CLARK  
DIRECTOR

October 15, 2019

UPS NEXT DAY DELIVERY

**ENFORCEMENT NOTICE**

In the matter of:

Intertape Polymer Group  
317 Kendall Avenue  
Marysville, Michigan 48040

SRN: A6220; St. Clair County

ATTENTION: Mr. Brian Newman, Operations Manager

This letter is to advise you of the commencement of escalated enforcement action against Intertape Polymer Group (Company). This letter follows the July 23, 2019 Violation Notice issued by the Michigan Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD) which detailed violations of the National Emission Standards for Hazardous Air Pollutants for Miscellaneous Coating Manufacturing, Title 40 of the Code of Federal Regulations, Part 63, Subpart HHHHH and Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994, PA 451, as amended (NREPA), MCL 324.5501 *et seq.* and the administrative rules promulgated thereunder.

The alleged violations against the Company are federally enforceable and are considered a High Priority Violation (HPV) by the United States Environmental Protection Agency (EPA). The HPV designation means that the EPA places a priority on enforcing the regulations governing this violation and on formally resolving alleged violations of this type. The AQD is required to report all HPVs to the EPA, pursuant to the state's grant commitments with the EPA and the state's delegated enforcement authority of the federal Clean Air Act.

The AQD is providing the Company with an opportunity to formally resolve these violations through the entry of a legally enforceable agreement that will include a compliance program and payment of an appropriate monetary penalty pursuant to Section 5528 of Part 55 of NREPA, MCL 324.5528.

Be advised that failure to respond to this Enforcement Notice in a timely manner and adequately resolve or address the cited violations may result in further enforcement proceedings, including but not limited to, referral of the matter to the Michigan Department of Attorney General (MDAG) for commencement of civil litigation. This

**ENFORCEMENT NOTICE**

Mr. Brian Newman

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Enforcement Notice does not preclude or limit EGLE's ability to initiate any other enforcement action under federal or state law as appropriate.

Please contact me at 517-284-6769, or by email at morane@michigan.gov, no later than October 25, 2019 to schedule a meeting to discuss the resolution of this matter.

STATE OF MICHIGAN  
DEPARTMENT OF ENVIRONMENT,  
GREAT LAKES, AND ENERGY

By:   
Erin Moran  
Air Quality Division, Enforcement Unit

Date: 10/15/19

cc: Ms. Sarah Marshall, U.S. EPA, Region 5  
Mr. Neil Gordon, MDAG  
Ms. Joyce Zhu, EGLE  
Ms. Jenine Camilleri, EGLE  
Mr. Sebastian Kallumkal, EGLE  
Mr. Iranna Konanahalli, EGLE