



intertape polymer group™

SK
Change

October 25, 2013

Ms. Teresa Seidel
Environmental Quality Supervisor

Mr. Sebastian Kallumkal
Senior Environmental Engineer

MDNRE – Southeast Michigan District Office
27700 Donald Court
Warren, MI 48092-2793

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Re: Revised Semi-Annual Deviation Report 2013
Intertape Polymer Group
Marysville, MI 48040 St. Clair County
ROP No. MI-ROP-A6220-2009; SRN A6220

Dear Ms. Seidel and Mr. Kallumkal,

Attached are revised semi- annual ROP and deviation reports for the reporting period 01/01/2013-06/30/2013. The revisions are to correct minor typographical errors.

As indicated in your letter dated October 4, 2013, Intertape Polymer Group filed the semiannual reports past the September 15, 2013 due date. The late submission was an oversight and we apologize for any inconvenience. Intertape Polymer Group has taken appropriate steps to ensure that our ROP reporting requirements are submitted in timely manner going forward.

Thank you for bringing these deficiencies to our attention. Please contact Mr. Michael Roughton at (810)941-6370 if you should have any question.

Sincerely,

Mike Roughton
Operations Manager
Intertape Polymer Group

ycarnell@itape.com

Cc Rick Carnell- IPG Director HS&E
Attachments:



intertape polymer group™

October 25, 2013

Ms. Teresa Seidel
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Intertape Polymer Group
Marysville, MI 48040 St. Clair County
ROP No. MI-ROP-A6220-2009; SRN A6220



Dear Ms. Seidel and Mr. Kallumkal,

Attached are the following revised reports. The revisions are to correct minor typographical errors.

- 2013 Semiannual Deviation Report reporting period 01/01/2013-06/30/2013
- ROP Report Certification form
- POWC-MACT Semiannual Compliance form 01/01/2013-06/30/2013

A copy of this submittal is being sent to the USEPA, Michigan Air Compliance Division.
Please contact Mr. Michael Roughton at (810)941-6370 if you should have any question.

Sincerely,

Mike Roughton
Operations Manager
Intertape Polymer Group

Cc Rick Carnell- IPG Director HS&E

United States Environmental Protection Agency (USEPA)
Air Compliance Data- Michigan
Air and Radiation Division
77 West Jackson Boulevard
Chicago, IL 60604

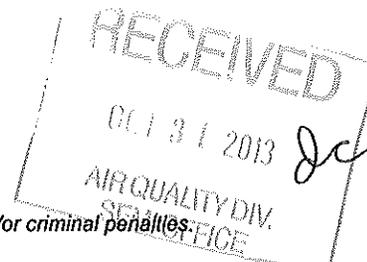
Attachments:



MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION

RENEWABLE OPERATING PERMIT
REPORT CERTIFICATION

Authorized by 1994 P.A. 451, as amended. Failure to provide this information may result in civil and/or criminal penalties.



Reports submitted pursuant to R 336.1213 (Rule 213), subrules (3)(c) and/or (4)(c), of Michigan's Renewable Operating Permit (ROP) program must be certified by a responsible official. Additional information regarding the reports and documentation listed below must be kept on file for at least 5 years, as specified in Rule 213(3)(b)(ii), and be made available to the Department of Environmental Quality, Air Quality Division upon request.

Source Name Intertape Polymer Group County St. Clair

Source Address 317 Kendall Avenue City Marysville

AQD Source ID (SRN) A6220 ROP No. MI-ROP-A6220-2009 ROP Section No. NA

Please check the appropriate box(es):

Annual Compliance Certification (Pursuant to Rule 213(4)(c))

Reporting period (provide inclusive dates): From _____ To _____

1. During the entire reporting period, this source was in compliance with ALL terms and conditions contained in the ROP, each term and condition of which is identified and included by this reference. The method(s) used to determine compliance is/are the method(s) specified in the ROP.

2. During the entire reporting period this source was in compliance with all terms and conditions contained in the ROP, each term and condition of which is identified and included by this reference, EXCEPT for the deviations identified on the enclosed deviation report(s). The method used to determine compliance for each term and condition is the method specified in the ROP, unless otherwise indicated and described on the enclosed deviation report(s).

Semi-Annual (or More Frequent) Report Certification (Pursuant to Rule 213(3)(c))

Reporting period (provide inclusive dates): From 01/01/2013 To 06/30/2013

1. During the entire reporting period, ALL monitoring and associated recordkeeping requirements in the ROP were met and no deviations from these requirements or any other terms or conditions occurred.

2. During the entire reporting period, all monitoring and associated recordkeeping requirements in the ROP were met and no deviations from these requirements or any other terms or conditions occurred, EXCEPT for the deviations identified on the enclosed deviation report(s).

Other Report Certification

Reporting period (provide inclusive dates): From _____ To _____

Additional monitoring reports or other applicable documents required by the ROP are attached as described:

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in this report and the supporting enclosures are true, accurate and complete

<u>Mike W. Roughton</u>	<u>Operations Manager II</u>	<u>810-941-6370</u>
Name of Responsible Official (print or type)	Title	Phone Number
		<u>10/28/13</u>
Signature of Responsible Official		Date

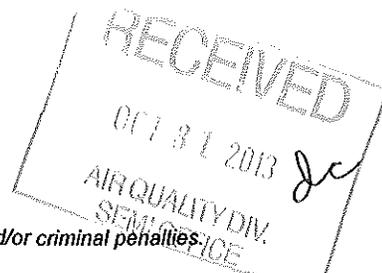
* Photocopy this form as needed.



MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION

**RENEWABLE OPERATING PERMIT
DEVIATION REPORT**

Authorized by 1994 P.A. 451, as amended. Failure to provide this information may result in civil and/or criminal penalties.



This form may be submitted in conjunction with the Renewable Operating Permit Report Certification form (EQP 5736) to report deviations from all general conditions and special conditions in the Renewable Operating Permit (ROP) for which deviations required to be reported by R 336.1213 (Rule 213) subrule (3)(c) have occurred. Additional information regarding the reports and documentation listed below must be kept on file for at least 5 years, as specified in Rule 213(3)(b)(ii), and be made available to the Department of Environmental Quality, Air Quality Division, upon request. Items 1 - 8 must be completed for all deviations being reported.

Source Name Intertape Polymer Group County Saint Clair

Source Address 317 Kendall Avenue City Marysville

AQD Source ID (SRN) A6220 ROP No. MI-ROP-A6220-2009 ROP Section No. N/A

ROP Section Contact Garrett Stricker Contact Phone No. (810)-941-6382

Reporting Period (provide inclusive dates): From January 1, 2013 to June 30, 2013

Report Type: Annual Semi Annual Other (Describe) _____

1. Group or Source Wide ID FGCOATINGPROCESS	2. Condition No. VI.14.b.iv	3. Date(s) of Occurrence 1/25/13 05:15-05:45	4. Previously reported ? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If Yes, Date	5. Duration of Deviation 0.75 hour
6. Method Used to Determine Compliance Status (if different from method specified in ROP)		7. Description of Deviation: Line 4 C-2 oven static pressure 3-hour average recorded below operating limit.		
8. Reason for Deviation and Description of Corrective Action Taken: After deviation was discovered the system returned to normal, the meters where inspected and no action was needed.				

1. Group or Source Wide ID FGCOATINGPROCESS	2. Condition No. VI.14.b.iv	3. Date(s) of Occurrence 1/25/13 05:15-05:45 2/22/13 04:15-06:15 2/22/13 16:15-19:15 2/26/13 03:15-15:00 5/7/13 11:15-11:30 5/8/13 02:14-02:45 5/8/13 10:15-13:15 5/13/13 06:15-10:00 5/13/13 14:15-16:15 5/14/13 11:00-13:00 5/16/13 03:00-04:00 5/21/13 01:15-18:15 06/7/13 02:15-04:00 6/8/13 14:00-21:00 6/10/13 07:15-13:00 6/11/14 09:15-14:15 6/14/13 07:15-08:00 6/18/13 22:00-23:45	4. Previously reported ? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If Yes, Date	5. Duration of Deviation 15 separate dates of occurrence
6. Method Used to Determine Compliance Status (if different from method specified in ROP)		7. Description of Deviation: Line 1 C-1 oven static pressure 3-hour average recorded below operating limit.		
8. Reason for Deviation and Description of Corrective Action Taken: SEE NEXT PAGE				

The magnahelic read within operating limit, but when transferred to the record system a calibration factor recorded it below limits. No alarm was issued because the alarm is based on the magnahelic reading. The system was re-calibrated and collection tubing has been cleaned and replaced. This was a similar issue to another zone on the same coating unit in our previous report (LIC2 Oven). Full investigation on going and corrective actions to follow.

1. Group or Source Wide ID EUCOMPOUNDING	2. Condition No. III.1	3. Date(s) of Occurrence 5/8/13-6/30/13	4. Previously reported ? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If Yes, Date	5. Duration of Deviation 53 days
6. Method Used to Determine Compliance Status (if different from method specified in ROP)		7. Description of Deviation Baghouse pressure drop reading of .7. The PMP for the baghouse reads a minimum of .75 must be recorded.		
8. Reason for Deviation and Description of Corrective Action Taken: This was caused by changing the filter/bags and the process in which they become coated to operating in the desired manner.				

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Intertape Polymer Group
MACT Deviations Log

EUCOMPOUNDING

Baghouse Process Deviations

Condition No: I.1

Baghouse Emissions Above Limit (0.10lbs/1,000lbs)

Start	End	Emission Amount	Reason for Emissions	Corrective Action Taken	Deviation?
NONE					No

Condition No: VI.1

Less than 1 Bag House Record per week

Start Date	End Date	# of weeks out of Compliance	Reason for Data Gap	Corrective Action Taken	Deviation?
					No
					No

Condition No: III.1

Baghouse Static Pressure Deviations (>3.0" or <.75")

Start	End	Static Pressure	Reason for Static Pressure Deviation	Corrective Action Taken	Deviation?
5/8/13	6/30/13	6	Static pressures were lower than the required levels due to filters being replaced and being coated to operate at the needed levels.	None, normal process of filter/bag changes that cause deviation. This is covered in the PMP for the baghouse.	YES

Condition No: IX.1

Bag House PM Schedule (Once per Year)

Date	Actions Taken if necessary	Deviation?

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Intertape Polymer Group
MACT Deviations Log

FGCOATINGPROCESS

RTO System Deviations

Condition No: I.1

VOC Emissions Above Limit (0.25 lbs/hr)

Start	End	Emission Amount (lbs/hr)	Reason for Emissions	Corrective Action Taken	Deviation?
NONE					No

Condition No: I.1

RTO 3-Hour Average Temperature Below 1400 degrees F.

Start	End	Lines Running During Period	Reason for Temperature Deviation	Corrective Action Taken	Deviation?
NONE		1, 4	Actuator failed in closed position on RTO burner	Replaced actuator.	No
					No

Condition No: I.1

HAP Emission Above Limit (20%)

Start	End	Emission Amount (lbs/hr)	Reason for Emissions	Corrective Action Taken	Deviation?
NONE					No

Intertape Polymer Group

MACT Deviations Log

FGCOATINGPROCESS

Coating Process Deviations

Condition No: I.1

Coating VOC Emission Deviations (Line 1 > 4.79 lbs/gal)

Start	End	Emission Amount (lbs/hr)	Reason for Emissions	Corrective Action Taken	Deviation?
NONE					No

Condition No: VI.14.b.iv

Coating Static Pressure Deviations (Line 1 A Oven < 0.91)

Start	End	Lines Running During Period	Reason for Static Pressure Deviation	Corrective Action Taken	Deviation?
NONE					No
					No

Condition No: VI.14.b.iv

Coating Static Pressure Deviations (Line 1 C1 Oven < 0.89)

Start	End	Lines Running During Period	Reason for Static Pressure Deviation	Corrective Action Taken	Deviation?
1/25/13 05:15-05:45		3	The potential reason for the static pressure drops is related to three primary causation factors. 1) When three lines are running the systematic opening and closing of valves to direct gas flow to the solvent recovery there can be momentary drops during the valve switching process. 2) The magnahelic readings are being interrupted by dirty or clogged tubing. 3) A conversion factor between the magnahelic and the recording chart may need to be calibrated.	Static pressure alarm did not function and alert operator to deviation. A full inspection is underway and corrective actions will be developed following the outcome of the investigation. This appears to be a calibration error between the system and the actual meters, the actual meters are reading in compliance but a conversion factor is recording them as below the operating limit. The data shows the operating limit at 0.19" of water and most reading came in at or near 0.18" of water.	Yes
2/22/13 04:15-06:15		1			Yes
2/22/13 16:15-19:15		2			Yes
2/26/13 03:15-15:00		3			Yes
5/7/13 11:15-11:30		2			Yes
5/8/13 02:14-02:45		3			Yes
5/8/13 10:15-13:15		3			Yes
5/13/13 08:15-10:00		2			Yes
5/13/13 14:15-16:15		3			Yes
5/14/13 11:00-13:00		3			Yes
5/16/13 03:00-04:00		3			Yes
5/21/13 01:15-18:15		3			Yes
06/7/13 02:15-04:00		3			Yes
6/8/13 14:00-21:00		3			Yes
6/10/13 07:15-13:00		3			Yes
6/11/14 09:15-14:15		3			Yes
6/14/13 07:15-08:00		3			Yes
6/18/13 22:00-23:45		3	Yes		
				No	
				No	

Condition No: VI.14.b.iv

Coating Static Pressure Deviations (Line 3 Dryer 5 Zone 2 Oven < 0.60)

Start	End	Lines Running During Period	Reason for Static Pressure Deviation	Corrective Action Taken	Deviation?
NONE					No
					No

Condition No: VI.14.b.iv

Coating Static Pressure Deviations (Line 3 Dryer 5 Zone 3 Oven < 0.53)

Start	End	Lines Running During Period	Reason for Static Pressure Deviation	Corrective Action Taken	Deviation?
NONE					No
					No

Intertape Polymer Group

MACT Deviations Log

Condition No: VI.14.b.iv

Coating Static Pressure Deviations (Line 3 Dryer 5 Zone 4 Oven < 0.30)

Start	End	Lines Running During Period	Reason for Static Pressure Deviation	Corrective Action Taken	Deviation?
NONE					No
					No

Condition No: I.1

Coating VOC Emission Deviations (Line 4 > 4.79 lbs/gal)

Start	End	Emission Amount (lbs/hr)	Reason for Emissions	Corrective Action Taken	Deviation?
NONE					No
					No

Condition No: VI.14.b.iv

Coating Static Pressure Deviations (Line 4 A Oven < 0.46)

Start	End	Lines Running During Period	Reason for Static Pressure Deviation	Corrective Action Taken	Deviation?
NONE					No
					No

Condition No: VI.14.b.iv

Coating Static Pressure Deviations (Line 4 C1 Oven < 0.19)

Start	End	Lines Running During Period	Reason for Static Pressure Deviation	Corrective Action Taken	Deviation?
NONE					No
					No

Condition No: VI.14.b.iv

Coating Static Pressure Deviations (Line 4 C2 Oven < 0.22)

Start	End	Lines Running During Period	Reason for Static Pressure Deviation	Corrective Action Taken	Deviation?
1/25/13 5:15 AM	1/25/13 5:45 AM	2	Unknown - System Corrected itself before deviation was recorded	None	Yes

Condition No: I.1

Coating VOC Emission Deviations (Pilot Line > 4.79 lbs/gal)

Start	End	Emission Amount (lbs/hr)	Reason for Emissions	Corrective Action Taken	Deviation?
NONE					No
					No

Condition No: I.2; I.3

Coating VOC Emission Deviations (Pilot Line > 32.87 lbs/hr or 65.74 tons/yr)

Start	End	Emission Amount (lbs/hr)	Reason for Emissions	Corrective Action Taken	Deviation?
NONE					No
					No

Intertape Polymer Group
MACT Deviations Log

FGRULE287(c)

Paint Booth Process Deviations

Condition No: II.1

Paint Booth Usage Deviation (> 200 gal/month)

Date	Adjustments	Reason for Deviation	Corrective Action Taken	Deviation?
None				No

Condition No: I.1

Paint Booth VOC Emission Rate Deviations (> 100 lbs/day or 2,000 lbs/month)

Start	End	Emission Amount (lbs/hr)	Reason for Emissions	Corrective Action Taken	Deviation?
None					No

Intertape Polymer Group
MACT Deviations Log

FGCOATINGPROCESS

Continuous Monitoring System (CMS) Deviations

Condition No: VI.16.e

CMS Calibration PM (Every 6 Months)

Date Performed	Status	Adjustments	Reason for Deviation	Corrective Action Taken	Deviation?
1/8/2013	Completed	None	N/A	N/A	No
09/01/12	Completed	None	N/A	N/A	No

Condition No: VI.14.a.i

Bypass Monitoring Calibration PM (Monthly)

Date Performed	Status	Adjustments	Reason for Deviation	Corrective Action Taken	Deviation?
1/4/2013	Completed	None	N/A	N/A	No
2/6/2013	Completed	None	N/A	N/A	No
3/4/2013	Completed	None	N/A	N/A	No
4/3/2013	Completed	None	N/A	N/A	No
5/3/2013	Completed	None	N/A	N/A	No
6/4/2013	Completed	None	N/A	N/A	No

Condition No: VI.16.i.i

RTO Thermocouple PM (Every 3 Months)

Date Performed	Status	Checked	Reason for Deviation	Corrective Action Taken	Deviation?
01/08/13	Completed	Yes	N/A	N/A	No
03/04/13	Completed	Yes	N/A	N/A	No

Condition No: VI.16.a

CMS Downtime (Less than 3 out 4 readings per hour)

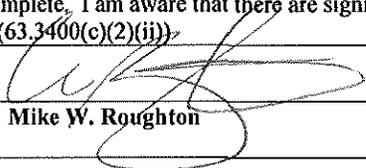
Start	End	Lines Running During Period	Reason for CMS Downtime	Corrective Action Taken	Deviation?
None					No

Condition No: VI.17.a

Coating Control Bypassed (Venting)

Start	End	Lines Running During Period	Reason for Deviation	Corrective Action Taken	Deviation?
NONE					No

Paper and Other Web Coating Industry – 40 CFR Part 63, Subpart JJJJ
Example Semi-Annual Report – Emission Monitoring System Performance (63.3400(c))
(For Facilities Demonstrating Compliance With Use of Capture/Control Equipment)

Company Name: Intertape Polymer Group		Beginning date of reporting period: 01/01/2013	Ending date of reporting period: 06/30/2013
Name of Affected Source: Intertape Polymer Group		Address of Affected Source: 317 Kendall Avenue, Marysville, MI 48040	
Person to Contact Regarding Submittal: Mike Roughton	Mailing Address: 317 Kendall Avenue, Marysville, MI 48040		Telephone No: 810-941-6370
Brief description of process units: Line 1, Line 3, Line 4 and Pilot Coater are coating lines that manufacture Pressure Sensitive Tape.		Total operating time of affected source during reporting period: 4000	
Identification of each hazardous air pollutant monitored at the affected source: 40 CFR Part 63 Subpart JJJJ regulates all organic hazardous air pollutant (HAP) emissions as a whole and does not regulate specific HAPs on an individual basis. Therefore, the identification of each hazardous air pollutant monitored at the affected source, as required by §63.10(e)(3)(vi) is the entire list of all of the organic HAP's. (Section 112(b)(1))			
Name, Title and Signature of Responsible Official Who is Certifying Accuracy of Report: I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment. (63.3400(c)(2)(ii))			
Signature: 			Date of report: 10/28/13
Printed Name: Mike W. Roughton		Title: Operations Manager II	

Deviations of Criteria⁴

Criteria Reviewed	Emission and operating parameter limitations specified in the relevant standard(s) for existing sources	Has standard been deviated from? The following character may used for convenience: <input checked="" type="checkbox"/>	Method of Compliance Determination. Check which applies. Only check if the relevant standard has been deviated from, then continue to next page. The following character may used for convenience: <input checked="" type="checkbox"/>
§63.3370 ⁵ (Check all compliance methods used)	Standard for Paper and Other Web Coating Facility ⁶		
§63.3370(e) <input type="checkbox"/> Permit Condition ⁷ :	Capture and control overall organic HAP emissions by 95%, or limit outlet organic HAP concentration < 20 ppmv by compound on a dry basis	<input type="checkbox"/> Yes <input type="checkbox"/> No	Continuous Parameter Monitoring System <input type="checkbox"/> Continuous Emissions Monitoring System <input type="checkbox"/> Solvent Recovery Liquid-Liquid Material Balance <input type="checkbox"/>
§63.3370(f) <input type="checkbox"/> Permit Condition:	Capture and control emissions to <0.2 kg organic HAP/kg solids as applied	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Continuous Parameter Monitoring System <input checked="" type="checkbox"/> Continuous Emissions Monitoring System <input type="checkbox"/> Solvent Recovery Liquid-Liquid Material Balance <input checked="" type="checkbox"/>
§63.3370(g) <input type="checkbox"/> Permit Condition:	Capture and control emissions to <0.04 kg organic HAP/kg coating material applied	<input type="checkbox"/> Yes <input type="checkbox"/> No	Continuous Parameter Monitoring System <input type="checkbox"/> Continuous Emissions Monitoring System <input type="checkbox"/> Solvent Recovery Liquid-Liquid Material Balance <input type="checkbox"/>
§63.3370(h) <input type="checkbox"/> Permit Condition:	Capture and control emissions to achieve allowable emissions rate calculated equivalent allowable organic HAP per §63.3370(l)	<input type="checkbox"/> Yes <input type="checkbox"/> No	Continuous Parameter Monitoring System <input type="checkbox"/> Continuous Emissions Monitoring System <input type="checkbox"/> Solvent Recovery Liquid-Liquid Material Balance <input type="checkbox"/>

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⁴ If no exceedances or deviations occurred, complete only page 1 and submit to the appropriate agencies.

⁵ Note that multiple compliance methods may be used during the six-month period. If more than one method was used, identify in the box the month(s) when each particular compliance method was used. For reporting due dates, see the POWC Timeline.

⁶ A brief description of each potential compliance method (§63.3370(e) - (h)) is included. Please refer to the Standard for detailed descriptions of each method of compliance.

⁷ For Title V sources, enter the appropriate permit condition number

Deviation of Criteria: Applicable for Continuous Parameter Monitoring Systems (63.34009(c)(2)(v))

Identity deviation of CPMS Downtime	Parameter Being Monitored (i.e. control device temperature)	Period Of Deviation	Description and Cause of Deviation (if applicable) or cause of CPMS downtime (do not include downtime associated with zero and span and other calibration checks)	Corrective Actions Taken To Remedy Deviation	Previously Reported
Operating Limit Deviation	Static Pressure	1/25/2013	Line 4 C2 Oven Static Pressure 3 hour average below operating limit.	Static pressure alarm did not function and alert operator to deviation. A full inspection is underway and corrective actions will be developed following the outcome of the investigation. This appears to be a calibration error between the system and the actual meters, the actual meters are reading in compliance but a conversation factor is recording them as below the operating limit. The data shows the operating limit at 0.19% of water and most reading came in at or near 0.18" of water.	NO
Operating Limit Deviation	Baghouse Pressure Drops	5/8/13 -6/30/13	Baghouse pressure drop reading of .7. The PMP for the baghouse reads a minimum of .75 must be recorded.	This was caused by changing the filter/bags and the process in which they become coated to operating in the desired manner.	NO
Operating Limit Deviation	VI.14.b.iv	1/25/13 05:15-05:45 2/22/13 04:15-06:15 2/22/13 16:15-19:15 2/26/13 03:15-15:00 5/7/13 11:15-11:30 5/8/13 02:14-02:45 5/8/13 10:15-13:15 5/13/13 06:15-10:00 5/13/13 14:15-16:15 5/14/13 11:00-13:00 5/16/13 03:00-04:00 5/21/13 01:15-18:15 06/7/13 02:15-04:00 6/8/13 14:00-21:00 6/10/13 07:15-13:00 6/11/14 09:15-14:15 6/14/13 07:15-08:00 6/18/13 22:00-23:45	Line 1 C-1 oven static pressure 3-hour average recorded below operating limit. The magnahelic read within operating limit, but when transferred to the record system a calibration factor recorded it below limits. No alarm was issued because the alarm is based on the magnahelic reading. The system was re-calibrated and collection tubing has been cleaned and replaced. This was a similar issue to another zone on the same coating unit in our previous report (L1C2 Oven). Full investigation on going and additional corrective actions to follow.	The system was re-calibrated and collection tubing has been cleaned and replaced.	No

Kallumkal, Sebastian (DEQ)

From: Kallumkal, Sebastian (DEQ)
Sent: Thursday, November 07, 2013 6:56 PM
To: 'rcarnell@itape.com'
Subject: Intertape Polymer Group-Semi-Annual Reporting

Dear Mr. Carnell,

I reviewed your semi-semiannual report and the deviation report. Corrective action for the deviation related to Line 1, C1 Oven indicated that "a full inspection is underway and corrective actions will be developed following the outcome of the investigation". Please send me a detailed report of your investigation regarding these deviations and the corrective actions developed to alleviate such deviations.

Please identify why the static pressure for Line1 C1 Oven is about 0.18 "WC while the limit is 0.89"WC. This may affect the capture efficiency of the control system which in turn would affect the HAP emissions.

The renewal application for the Renewable Operating Permit is due by February 9, 2014.

Thank you for your cooperation.

Sebastian G. Kallumkal
Sr. Env. Engineer
MDEQ/Air Quality Division
S. E. Michigan District Office
27700 Donald Court
Warren, Michigan 48092
kallumkals@michigan.gov
(586) 753 3738 (O)
(586) 753 3731 (F)