



GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF
ENVIRONMENT, GREAT LAKES, AND ENERGY
WARREN DISTRICT OFFICE



LIESL EICHLER CLARK
DIRECTOR

July 3, 2019

Mr. Brian Newman, Operations Manager
Intertape Polymer Group
317 Kendall Avenue
Marysville, Michigan 48040

SRN: A6220, St. Clair County

Dear Mr. Newman:

VIOLATION NOTICE

On June 26, 2019, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), received a notification from Intertape Polymer Group (IPG) located at 317 Kendall Avenue, Marysville, Michigan. The purpose of this notification was to inform EGLE that IPG's Marysville facility is subject to National Emission Standards for Hazardous Air Pollutants (NESHAP) for Miscellaneous Coating Manufacturing (MCM) codified under 40 CFR 63, Subpart HHHHH.

During the review of this notification to determine IPG'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 Renewable Operating Permit (ROP) number MI-ROP-A6220-2015a, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
EUWETMIX&WHIP-OP, Mixing Vessels 4, 5, & 6, Churns 4, 5 & 6, Portable Tank (IBC), WIP Process, EUSTORAGETANK1, EUSTORAGETANK2, and UST Toluene Storage	40 CFR 63, Subpart HHHHH-National Emission Standards for Hazardous Air Pollutants (NESHAP): Miscellaneous Coating Manufacturing	IPG failed to notify EGLE regarding the applicability in a timely manner and show compliance with the requirements of this NESHAP.

Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by **July 24, 2019**. The written response should include: the dates the violation occurred; an explanation of the causes and duration of the violation; whether the violation is ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violation and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

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Please submit the written response to EGLE, AQD, Warren District, at 27700 Donald Court, Warren, Michigan 48092 and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If IPG 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 violation cited above and acknowledging and disclosing the potential non-compliance at the IPG Marysville facility. If you have any questions regarding the violation or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,



Sebastian G. Kallumkal
Senior Environmental Engineer
Air Quality Division
586 753 3738

cc: Ms. Mary Ann Dolehanty, EGLE
Dr. Eduardo Olaguer, EGLE
Ms. Jenine Camilleri, EGLE
Mr. Christopher Ethridge, EGLE
Ms. Joyce Zhu, EGLE