



Molded & Decorated Plastic Systems

*Dennis*  
SUMMIT POLYMERS, INC.  
Syntech Plant

August 7, 2017

Dennis Dunlap – Environmental Quality Specialist  
Kalamazoo District Office  
Michigan DEQ – Air Quality Division  
7953 Adobe Road  
Kalamazoo, Michigan 49009



Mr. Dennis Dunlap,

This is in response to the Violation Notice you sent dated July 25, 2017. *N1935*

Regarding the violation of PTI No. 160-16 Special Condition VIII where stacks were observed to have non-compliant rain caps, have been corrected. We removed the caps on July 28. Please see the attached photo for proof. The coating line was in operation for 13 days in July with the rain caps in place: 7/12, 7/13, 7/14, 7/17, 7/18, 7/19, 7/20, 7/21, 7/24, 7/25, 7/26, 7/27 and 7/28.

While we don't plan to install any more stacks at this facility in the near future, this issue has been brought to Brent Yager, Summit's Chief Technical Manager of Manufacturing Coordination, to ensure this doesn't happen at any of Summit's other facilities.

Regarding the violation of PTI No. 160-16, Special Condition I.7 and IV.4.c, where we were observed to fail to deliver proof of compliance with the requirement that the daily weighted average of the VOC content of our coatings be below 5.0 pound per gallon (minus water). We were gathering daily paint usage, but were not summarizing it daily. We developed a database that will summarize the daily paint/production information automatically. Attached are examples of the spreadsheet that is recorded daily.

We sent a letter to Mary Douglas – AQD District Supervisor dated July 20 requesting permission to use supplier documentation in place of testing, and we received a response from her dated July 28 requesting that we send four samples for Method 24 testing to confirm the accuracy of the supplier's documentation. We're currently working with GPI Laboratories in Grand Rapids to have this testing completed this week. For the time being, we've compiled supplier documentation for all our production coatings that include the necessary physical characteristics, such as density, VOCs with Water and Exempt Solvents, and VOCs minus Water and Exempt Solvents.

Please don't hesitate to let us know if you need any information or assistance regarding these issues.

Thank you,

  
Dan Mulkey –

Sr. Manufacturing Engineer/Environmental Quality Analyst  
Summit Polymers – Sturgis

Cc: Mary Douglas – DEQ AQD District Supervisor  
Justin Wabindato – General Manager Summit Polymers, Sturgis