



GRETCHEN WHITMER
GOVERNOR

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



LIESL EICHLER CLARK
DIRECTOR

October 13, 2020

Mr. Richard Gippert
Summit Polymers Inc. - Vicksburg
115 South Leja Drive
Vicksburg, Michigan 49097

SRN: N5044, Kalamazoo County

Dear Mr. Gippert:

VIOLATION NOTICE

On September 15, 2020, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of Summit Polymers, Inc. - Vicksburg located at 115 South Leja Drive, Vicksburg, Michigan. The purpose of this inspection was to determine the facility'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 Permit to Install (PTI) number 228-04H.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
EUSystem2	PTI # 228-04H, EUSystem2, Special Condition VI.4.e	The facility had 12-month rolling VOC records, but did not provide VOC, acetone, and TBA combined for EUSystem2.
EUSystem2	PTI # 228-04H, EUSystem2, Special Condition VI.5.d	Facility either did not have some of these records, or they were not being calculated correctly.
EUSystem2	PTI # 228-04H, EUSystem2, Special Condition II.1	Records indicate an exceedance of this limit on June 13, 2020. The daily volume-weighted average was 5.24 lbs/gal on this date.
EUBTHLINE05	PTI # 228-04H, EUBTHLINE05, Special Condition II.1	Facility records indicate exceedances of this limit on August 8, 2018,

		November 16, 2018, and January 25, 2019.
EUBTHLINE05	PTI # 228-04H, EUBTHLINE05, Special Condition I.1	Facility records indicate exceedances of this limit in September 2019, October 2019, November 2019, December 2019, and January 2020
FGFACILITY	PTI # 228-04H, FGFACILITY, Special Conditions I.1 and 1.2	Facility was not calculating individual and aggregate HAPs emission (12-month rolling) correctly.
FGFACILITY	PTI # 228-04H, FGFACILITY, Special Conditions II.1 – II.5, and VI.4.c	Facility had monthly totals but not 12-month rolling totals.
FGFACILITY	PTI # 228-04H, FGFACILITY, Special Conditions I.4 and VI.5.d	Facility was not calculating 12-month rolling ethylbenzene emissions correctly

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by November 3, 2020 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the violations occurred; an explanation of the causes and duration of the violations; whether the violations are ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violations and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

Please submit the written response to EGLE, AQD, Kalamazoo District, at 7953 Adobe Road, Kalamazoo, Michigan 49009 and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Summit Polymers Inc. - Vicksburg 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.

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Thank you for your attention to resolving the violations cited above and for the cooperation that was extended to me during my inspection of the facility. If you have any questions regarding the violations or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,

Monica Brothers

Monica Brothers
Senior Environmental Quality Analyst
Air Quality Division
(269) 312-2535

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