



GRETCHEN WHITMER
GOVERNOR

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



PHILLIP D. ROOS
DIRECTOR

October 11, 2024

VIA EMAIL

Tony Doremire, EHS Manager
Sika Advanced Resins
1611 Hults Drive
Eaton Rapids, Michigan 48827

SRN: N5561, Eaton County

Dear Tony Doremire:

VIOLATION NOTICE

On August 20, 2024, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of Sika Advanced Resins located at 1611 Hults Drive, Eaton Rapids, Michigan. The purpose of this inspection was to determine Sika'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 86-95.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
Resin products and hardeners formulation process	PTI No. 86-95, SC 16.	Calendar years 2021 – 2023 records indicate exceedances of the 12.1 ton per year VOC emission limit.
Cleaning solvent process	PTI No. 86-95, SC 22.	Sika was unable to provide records of cleaning solvent used.
Unpermitted mixing processes	Rule 201	Insufficient exemption demonstrations for various mixing processes onsite.

VOCs

The records provided for calendar years 2021 – 2023 demonstrate that actual emissions of Volatile Organic Compounds (VOC) from the resin products and hardeners formulation process equipment are emitted at the following rates:

	VOC lbs	VOC tons
2021	99,817	49.9
2022	122,543	61.3
2023	111,752	55.9

Special Condition 16 of PTI number 86-95 limits the emissions of VOC to 12.1 tons per year. The records indicate that Sika is in non-compliance with this limit for calendar years 2021 – 2023, and is therefore, a violation of Special Condition 16.

Cleaning Solvent Usage

In follow-up to this inspection, Sika was unable to produce cleaning solvent usage rate records to determine compliance with the 10,000-gallon cleaning solvent usage rate per 12-month rolling period.

This is a violation of the recordkeeping requirement specified in Special Condition 22 of PTI number 86-95.

Rule 201

Historically, Sika has used the Rule 290 exemption to demonstrate that the unpermitted equipment, listed below, is exempt from the need to obtain a permit. During this inspection, Sika provided an audit document, dated December 2023, created by Cornerstone consultants. In this document there is an attempt to demonstrate the equipment is exempt per Rule 290 or Rule 291. These demonstrations were insufficient. This is a violation of Rule 201 of the administrative rules promulgated under Act 451 because Sika cannot adequately demonstrate that the listed equipment is exempt under Rule 290 or Rule 291.

- 350 gal Myers Mixer #1
- 2 Myers Mixers, 100 gal
- 2 Tumblers, 50 gal each
- White APEC Ribbon mixer, 650 gal
- Hockmeyer press
- Large APEC Ribbon Mixer, 800

A program for compliance may include a completed PTI application for the unpermitted mixing process equipment. An application form is available by request, or at the following website: www.michigan.gov/air.

Be advised that Rule 201 requires that a permit be obtained prior to installation, construction, operation, reconstruction, relocation, or alteration of any process or process equipment which may be a source of an air contaminant.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by November 1, 2024, (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.

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Additionally, Sika should consider, as part of the violation resolution, to apply for a permit modification to ensure that the permit accurately reflects Sika's current processes.

Please submit the written response to Michelle Luplow at EGLE, AQD, Lansing District, at 525 W. Allegan St., First Floor South, Lansing, Michigan 48933 or LuplowM1@michigan.gov and submit a copy to Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Sika Advanced Resins 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 violations cited above and for the cooperation that was extended to me during my inspection of Sika Advanced Resins. 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,



Michelle Luplow
Environmental Quality Analyst
Air Quality Division
517-294-9294

cc: Greg Creighton, Sika Advanced Resins
Annette Switzer, EGLE
Christopher Ethridge, EGLE
Brad Myott, EGLE
Jenine Camilleri, EGLE
Robert Byrnes, EGLE
Loren Hicks, EGLE