

Ms. Heidi Hollenbach  
District Supervisor  
MDEQ-Air Quality Division  
350 Ottawa Avenue, NW, Unit 10  
Grand Rapids, MI 49503-2341

324 S Union St  
Sparta, MI 49345

Phone: (616) 887-9113  
Email: kfilbrandt@tesatape.com

RECEIVED  
SEP 06 2016

AIR QUALITY DIVISION  
GRAND RAPIDS DISTRICT

Re: Violation Notice with regards to semiannual emission exceedance and incinerator temperature reports as specified in 40 CFR Part 60, Subpart RR (dated August 26, 2016)  
tesa tape, inc., 324 South Union Street, Sparta, Michigan 49345  
SRN: B8860

September 1, 2016

Dear Ms. Hollenbach:

In this letter I would like to address the questions in the Violation Notice and the actions taken by tesa tape, inc.

To our knowledge tesa plant Sparta did not submit reports according to above-mentioned regulations since 2005.

Regarding the reasons for this violation it can be stated that tesa plant Sparta went through a significant change of management in 2014. In order to stay compliant with all federal and other regulations, tesa tape has had a third party consultant perform an Environmental Compliance Audit annually since 2014. The last one is dated May 10, 2016. The requirement for the report according to above-mentioned regulation was not brought to our attention and the missing report has never been pointed out to tesa tape. The reasons to stop submitting the report in the first place in 2005/2006 are unknown at this point.

Going forward, the requirement to semi-annually submit the report according to 40 CFR Part 60, subpart RR has been included in our internal compliance and reporting calendar, which is the basis for all necessary reporting to the MDEQ and other authorities. This tool works effectively as all other reports have been submitted on time and in full scope. The report for the first half of 2016 will follow in a separate letter.

We are confident during the unreported time no exceedance in emissions occurred. Also we are confident the RTO temperature did not fall below 1400°F, the permit requires no less than 1375°F. Below is a list of the RTO control parameters. Also if the RTO is not running in process mode the coating machine and mixing processes cannot be operated. This ensures that no uncontrolled VOCs are exhausted to the atmosphere.

1. The process parameter temperature set point is set for 1525°F and has never been changed since the startup in 2005. The process temperature runs between 1525°F and 1635°F
2. The low temperature shut down set point is 1400°F and has never been changed since 2005.
3. The inlet static pressure set point is set for -1.2 inches of water. This was set during the startup in 2005 and establishes the natural draft opening for the coating and mixing rooms.
4. If the inlet static pressure drops below -1 inch of water during process mode the RTO, coating machine and mixing process shut down automatically.

tesa tape, inc.  
Kai Filbrandt, plant manager Sparta



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Please contact me at 616.887.3118 or [kfilbrandt@tesatape.com](mailto:kfilbrandt@tesatape.com) if you require any additional information.

Sincerely,

A handwritten signature in black ink, appearing to read "K. Filbrandt". The signature is fluid and cursive, with a large initial "K" and a long, sweeping underline.

Kai Filbrandt, Ph.D.  
tesa tape, inc.

cc: Ms. Kaitlyn DeVries – MDEQ-AQD Grand Rapids District Office (by email)