



October 30, 2020

Michigan EGLE, AQD, Kalamazoo District
7953 Adobe Road
Kalamazoo, MI 49009

Attn. Monica Brothers



Ms. Brothers,

This letter is Summit Polymers response to the Violation letter written on October 13, 2020 in which several violations were noted from your inspection of the Vicksburg plant on September 15. Although some of the information was not readily available at the time of the inspection, the majority of the items noted were already in Summit's record keeping system. Summit has made updates to align the different parts of their tracking system and the records indicate compliance with all items noted in the violation letter. Each violation will be addressed in order as listed.

1. EUSystem2, special condition VI.4.e. Requirement states that records need to be kept that indicates VOC, TBA, and acetone combined. Chart reviewed only indicated VOC.

Response: Summit was calculating the monthly emission of VOC, TBA, and acetone. However, the information was not pulled into the twelve month rolling calculations. The recordkeeping has been updated back to February 2019 when 228-04H was started to reflect TBA and acetone as well as VOC.

2. EUSystem2, special condition VI.5.d Requirement states that the TAC's Glycol Ether DB (CAS # 112-34-5) and 2-(2- butoxyethoxy) ethyl acetate (CAS # 124-17-4) annual emission rate in tons per 12 month rolling time period be kept and recorded at the end of each calendar month. Our records only indicated the Glycol ether.

Correction Plan. The glycol ether was being recorded and shown on our HAP's rolling average. We were recording the TAC (2-(2- butoxyethoxy) ethyl acetate but did not indicate the rolling average on the spreadsheet previously. We have added 2-(2- butoxyethoxy) ethyl acetate to our 12 month rolling average, which demonstrates compliance with the emission limits.

3. EUSystem2, special condition II.1 Requirement states that the paint sprayed shall not exceed the material limit of 5.0#/gallon (minus water) based upon a daily volume weighted average. Records indicate that on June 13 2020 the average was 5.24#/gallon.

Actions/ Corrections taken. Summit discovered that the total amount of material sprayed on the date referenced did not include recent additions to the booth's scheduled work. During production it is necessary that work be moved from booth to booth to accommodate customer demand of equipment

issues. Spreadsheets are always being modified to reflect the new production requirements. The calculations for June 13 have been updated and demonstrate compliance with the limit.

4. EUBTHLINE05, special condition II.1 Requirement states that the paint sprayed shall not exceed the material limit of 5.0#/gallon (minus water) based upon a daily volume weighted average. Records indicated that this material limit was exceeded on August 8, 2018, November 16, 2018, and January 25, 2019.

Corrections taken. As discussed above, the calculations for the dates referenced did not include all material sprayed on the applicable dates. The calculations have been updated and demonstrate compliance with the limit referenced.

5. EUBTHLINE05, special condition I.1 Emission limit states not to exceed 30.0 tons/year VOC and acetone combines based upon a 12 month rolling time period. Records supplied indicated that this booth exceeded that for the months of September 2019 thru January 2020.

Corrective Action. In September of 2019 Summit discovered an error in our monthly VOC emission calculations. The calculations were corrected but the 12 month rolling emission calculation was not updated with the correct monthly emissions. Summit has pulled the correct monthly VOC emissions into the 12 month rolling emission calculations which demonstrates that EUBTHLINE5 was in compliance with this limit.

6. FGFACILITY special condition I.1 and I.2 Emission Limit of less than 9.0 tpy of individual HAP and less than 22.5 tpy aggregate HAP's. Finding was that Summit was not calculating them correctly.

Corrective Action. The spreadsheet has been corrected and HAP emissions are less than HAP limits.

7. FGFACILITY Special Condition II.1 – II.5 and VI.4.c Material Limit of usages of Coatings broken down by VOC content and to be tracked by a 12 month rolling time period. Finding that the usages were being tracked monthly and totals by calendar year.

Corrective Action. Reports have been modified to reflect 12 month rolling average instead of calendar year.

8. FGFACILITY Special Condition I.4 and VI.5.d ethyl benzene (CAS # 100-41-4) is to be tracked with a material limitation of 4.1 tpy based upon a 12 month rolling time period and is to be calculated at the end of each month. Finding was that the calculation was not being done properly.

Corrective Action. Summit Polymers tracks monthly and rolling time period usage of ethyl benzene (CAS# 100-41-4) on the HAP's Emission Calculation report that was identified earlier as having not being updated properly. The calculation has been updated and demonstrates compliance with the 4.1 tpy limit.

Corrected documents show that the Vicksburg facility never exceeded emission limits as specified in permit 228-04H. Summit will put in place a series of checks and reviews in our monthly Safety meeting to insure ongoing compliance. Summit also discovered improvements that can be made in our tracking system that can prevent these issues from happening in the future. We plan to implement the improvements to our tracking when we set it up for calendar year 2021 starting with January.

If you have any concerns or questions regarding this response please contact me at 269-649-4900 ext. 68128 or email at rgippert@summitpolymers.com

Thank you.



Richard Gippert

Sr. Mfg. Engineer

Summit Polymers Vicksburg.

Cc Ms. Jenine Camilleri
Enforcement Unit Supervisor EGLE
P.O. BOX 30260
Lansing, MI 48909-7760