



GRETCHEN WHITMER  
GOVERNOR

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



LIESL EICHLER CLARK  
DIRECTOR

September 15, 2022

Jody Flinton  
Summit Polymers-Plant 18  
5858 E. North Avenue  
Kalamazoo, Michigan 49048

SRN: P0815, Kalamazoo County

Dear Jody Flinton:

**VIOLATION NOTICE**

On July 7, 2022, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of Summit Polymers-Plant 18 located at 5858 E. North Avenue, Kalamazoo, 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 64-17A.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
EUACOATING	PTI #64-17A, Special Condition III.4, IV.3, VI.2, and VI.7	Facility did not have cure oven temperature records, and the temperature of Section 1 of the cure oven was 196°F at the time of the inspection. PTI #64-17A requires that the cure oven temperature stay below 194°F.
EUACOATING	PTI #64-17A, Special Conditions VI.1, VI.5(d), VI.5(e), and VI.6(d)	Facility could not provide acceptable 12-month rolling emissions calculations.
EUACOATING2	PTI #64-17A, Special Conditions VI.1 VI.3(d)	Facility could not provide acceptable 12-month rolling emissions calculations.
EUACOATING2	PTI #64-17A, Special Conditions IV.3, and VI.5	Facility did not have cure oven temperature records.

FGFACILITY	PTI #64-17A, Special Conditions II.4, VI.1, VI.3(e), VI.4(c), and VI.4(e)	Facility could not provide acceptable 12-month rolling emissions calculations. They also exceeded the material usage limit for Group 4 coatings in 2022. The limit for Group 4 coatings is 5,661 gallons per year, and they showed 7,797.5 gallons per year used for August 2022.
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Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by October 6, 2022 (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 Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Summit Polymers-Plant 18 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: Mary Ann Dolehanty, EGLE  
Annette Switzer, EGLE  
Christopher Ethridge, EGLE  
Brad Myott, EGLE  
Jenine Camilleri, EGLE  
Rex Lane, EGLE  
Nick Oberski, Summit Polymers-Plant 18  
Amanda Crux, Summit Polymers-Plant 18