## DEPARTMENT OF ENVIRONMENTAL QUALITY

B6027\_FCE\_20160303\_140)

## AIR QUALITY DIVISION

## FCE Summary Report

Facility : Inteva Product	s Adrian	Ope	erations			SRN :	B6027
Location: 1450 E. BEEC	HER ST					District :	Jackson
						County :	LENAWEE
City: ADRIAN	State:	MI	Zip Code :	49221	Comp Status		Compliance
Source Class : MAJOR					Staf	f: Michae	el Gabor
FCE Begin Date : 3/3/2015			нус <u>ция I — I — I — I — I — I — I — I — I</u> — I — I		FCE Date	Completion	3/3/2016
Comments :							
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## List of Partial Compliance Evaluations :

Activity Date	Activity Type	Compliance Status	Comments	
02/02/2016	Scheduled Inspection	Compliance	Major / ROP Source. Full Compliance Evaluation (FCE) and Inspection (PCE) of Inteva Products LLC, located at 1450 E. Beecher St., Adrian, Michigan 49221.	
10/02/2015	ROP Semi 1 Cert	Compliance	Deviation reported: Facility did not submit a Rule 216(2) notice at the time of implementation of PTI 51- 14. ROP has now been modified / updated, as PTI's 51-14 and 135- 07D have been rolled into ROP MI -ROP-B6027-2012a.	
10/02/2015	MACT (Part 63)	Compliance	Semi-Annual Compliance for Subpart PPPP, Surface Coating of Plastic Parts and Products.	
09/18/2015	Malfunction Abatement Plan	Compliance	Second Draft Submittal. Malfunction Abatement Plan pursuant to MI-ROP-B6027- 2012a, EU-Paint 1, 111(4). Second draft. Acceptable.	
08/24/2015 Malfunction Abatement Plan		Compliance	Malfunction Abatement Plan pursuant to MI-ROP-B6027- 2012a, EU-Paint 1, 111(4). Requested edits.	
08/07/2015	Telephone Notes	Compliance	Follow up to June 3, 2015 stack test results.	

Activity Date	Activity Type	Compliance Status	Comments
07/13/2015	Stack Test	Compliance	Air emissions stack test report of EU-Paint1 source and FG- MACTPPPP emission group materials and rotary carbon concentrator and RTO VOC destruction efficiency. This form certifies that the testing was conducted in accordance with the test plan and the facility was operating in compliance with permit limits.
06/15/2015	ROP SEMI 2 CERT	Compliance	Amended semi annual. Two additional deviations are being reported that were not included in the report and certification submitted March 13, 2015.
06/03/2015	Stack Test Observation	Compliance	Observed the capture and control efficiencies of EU-Paint 1 (Booths No. 1 and No.2), as required by permit 51-14.
06/01/2015	MAERS	Compliance	ROP Cert 3-16-15. Major Source. Recently transferred source. No support docs attached. Scheduled testing 6-3-15 for new coating line. Will obtain support records for other Mass balance used and other testing & EPA EF. Some MAERS EF used. Pending.
			M. Gabor: During the June 3, 2015 stack test, the facility environmental engineer (Michael Cannaert) provided DEQ staff with MAERS supporting documentation and also reviewed it with staff. Supporting documentation was added to the file.
05/07/2015	Stack Test	Compliance	Intent to Test Plan for EU-Paint 1 Thermal Oxidizer

Activity Type	Compliance Status	Comments
Reg. Applicability Determination	Compliance	To document: late submittal of Minor Modification Application now in-house; two issued PTIs. AQD making determination of R216(2) required actions. AQD Determination: Inteva needs to revise prior ROP Certification/Deviation Reports as applicable to reflect deviations of conditions between existing ROP and new PTIs where operation occurred prior to submittal of MM. Telephone notice given to Michael. He indicated one of two PTIs has difference between two documents/Conditions. Commenced operation December 2014 and will impact 2nd Semi. Agreed to submit revised Cert/Dev Report by May 8th.
Telephone Notes	Compliance	Michael informed me Inteva has a 5 year performance testing requirement and are proposing to conduct this testing the first week of June 2015. Test is for Capture efficiency and Destruction efficiency of the RTO on Paint Line 1. He is working to get Test Protocol to AQD within the 30 day prior time period. Mike informed me that the 5 yr requirement is in the recently issued PTI, but was somehow dropped from the last Renewal ROP. We acknowledged the Test Condition is/will be back in the ROP through the in-house MM in process with Kirsten Clemens.
ROP Other ROP Other	Compliance	Inteva is requesting a Minor Modification to incorporate Permit to Install 135-07D, issued May 31 2013, and Permit to Install 51-14, issued June 25, 2014 into MI-ROP -B6027-2012. Permit No. 135- 07D was not previously submitted because the MDEQ inspector said that we could wait for Permit No. 51-14 to be finalized and they could be completed together. Inteva is requesting an Off Permit Change to incorporate Permit to Install 67-14, issued May 22, 2014, into Renewable Operating
	Reg. Applicability Determination	Reg. Applicability Compliance   Determination Compliance   Telephone Notes Compliance   ROP Other Compliance

Activity Date	Activity Type	Compliance Status	Comments
03/20/2015	Telephone Notes	Compliance	Received inquiry call regarding ROP Modifications based on recently issued PTI No. 67-14. AQD determined three PTIs have been issued since 2012 ROP. Inteva needs to submit Minor Mod Application to address all three asap. Michael agreed to review/submit this asap. (Consulted with Kirsten Clemens)
03/16/2015	<b>ROP Annual Cert</b>	Compliance	
03/16/2015	ROP SEMI 2 CERT	Compliance	MMG: Facilty submitted an amended ROP SEMI 2 CERT on 5/14/2015.

Name: Michael M. A. Date: 3/3/16 Supervisor:

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