DEPARTMENT OF ENVIRONMENTAL QUALITY AIR QUALITY DIVISION

FCE Summary Report

| Facility: Into | eva Products Adri | an Operations | | | SRN: | B6027 |
|--|-------------------|---------------|----------|-------------|------------|------------|
| Location: 14 | 50 E. BEECHER S | ST | | | District : | Jackson |
| | | | | | County: | LENAWEE |
| City: ADR | IAN State | : MI Zip Cod | e: 49221 | Comp | | Compliance |
| Source Class: MAJOR Staff: Mike Kovalchick | | | | | | |
| FCE Begin Date | : 10/1/2016 | | , | FCE Date | Completion | 5/25/2018 |
| Comments: New ROP issued April 17, 2018 and most recent inspection conducted 5/17/2018. With VOC/HAP emissions expected to decline going forward, may submit an opt-out permit. The facility is no longer using RTO as it can meet permit compliance without it. | | | | | | |

List of Partial Compliance Evaluations:

| Activity Date | Activity Type | Compliance Status | Comments |
|---------------|----------------------|-------------------|--|
| 05/17/2018 | Scheduled Inspection | Compliance | Inspection of a auto parts coating facility. |
| 04/02/2018 | MAERS | Compliance | ROP cert received 3-15-18. MAERS report reviewed. One significant error in audit report. Changed EU-Paint 1 Natural gas usage as it appeared to be a factor of 1000 too high. Didn't change emissions as Company supplied spreadsheet for calculations. Otherwise, similar to previous year. ROP renewal to be issued in April 2018 and emissions totals to be verified in upcoming inspection. No current compliance concerns. |
| 04/02/2018 | ROP Annual Cert | Compliance | Company reported no deviations. Note that New ROP (renewal) to be issued in April, 2018. Upcoming inspection to verify compliance. |
| 04/02/2018 | ROP SEMI 2 CERT | Compliance | Company reported no deviations. Note that New ROP (renewal) to be issued in April, 2018. Upcoming inspection to verify compliance. |
| 04/02/2018 | MACT (Part 63) | Compliance | Subpart PPPP. Company averaging about 0.025 kg HAP emitted per kg coating solids. Limit is 0.16. No concerns. |

| Activity Date | Activity Type | Compliance Status | Comments |
|---------------|--------------------------|-------------------|--|
| 10/24/2017 | ROP Other | Compliance | ERM conducted Natural Draft Opening assessments of the openings in the EU-Paint 1. The assessments were conducted with use of a smoke tube in accordance with MDEQ guidance. |
| 09/20/2017 | ROP Semi 1 Cert | Compliance | No deviations reports during the 6 month period ending 6/3/2017. |
| 09/19/2017 | MACT (Part 63) | Compliance | Subpart PPPP. HAP emission rate in pounds of organic HA emitted per pounds of coating solids averaged around .024. |
| 07/21/2017 | ROP Tech Review Notes | Compliance | ROP Renewal |
| 05/09/2017 | MAERS | Compliance | 76 tons of VOC's. Significant drop in emissions from EU-Paint2 which appears to be due to reduction in throughput and lower VOC content supported by material balance spreadsheet. Other emissions calculations close to MAERS emission factors. No other concerns. About 7 tons of NOx. |
| 04/04/2017 | ROP Annual Cert | Compliance | 1 deviation reported for the year. Small exceedance in oven temperature over several hour period. Over temp alarm added . Inspected conducted by Staff on 2/2/2016 showed no compliance issues. |
| 04/04/2017 | ROP SEMI 2 CERT | Compliance | 1 deviation reported for the year. Small exceedance in oven temperature over several hour period. Over temp alarm added . Inspected conducted by Staff on 2/2/2016 showed no compliance issues. |
| 04/04/2017 | ROP Other | Compliance | 2016 MAERS ROP CERT |
| 02/06/2017 | ROP Other | Compliance | Scrap Cutting BMP as required in Section 2, Condition D.III.2 in the ROP |
| 10/25/2016 | ROP Semi 1 Cert | Compliance | No deviations. This is consistent with the inspection conducted by Staff on 2/02/2016 that found no compliance issues. |
| 10/25/2016 | MACT (Part 63) | Compliance | Semi-Annual Compliance Report 40 CFR 63 Subpart PPPP |

Name: Morality Date: 5/25/2018 Supervisor: