



EGLE Jackson District Office
State Office Building, 4th Floor
301 East Louis Glick Highway
Jackson, MI 49201-1535

Attn: Scott Miller

August 1, 2023

Inteva Products – Adrian Operations (SRN B6027) has received a Violation Notice from Stephanie Weems regarding air permit compliance for the boilers in use at the facility; one of the boilers is between 5-10 MMBtu and the other boiler is greater than 10 MMBtu.

Inteva-Adrian offers the following response with respect to this violation notice.

Date the Violation Occurred

Two temporary boilers were brought onsite to fill in for the boiler that had been in use at the facility, due to failure of the previous boiler. Due to personnel changes at the facility, we are not able to provide the dates that the temporary boilers were brought onsite, but it was prior to October 2017.

Explanation of Causes and Duration of the Violation

The boilers were initially intended to be temporary, so they were not submitted in a permit application. The boiler that was existing at that time had failed, so these temporary boilers were in place to heat the facility while the existing boiler was inspected and repaired. It was deemed fiscally irresponsible to repair the old boiler, so the temporary boilers were in place from that time on. These boilers only operate to provide building heat, so they are generally only in operation from November through April. The duration of the violation would be as follows:

- November 2016 through April 2017 (Note, this date is estimated)
- November 2017 through April 2018
- November 2018 through April 2019
- November 2019 through April 2020
- November 2020 through April 2021
- November 2021 through April 2022
- November 2022 through April 2023

Because the boilers were not permitted, recordkeeping was not maintained. This includes records of tune-ups, routine, and other maintenance. The facility has included the boilers in MAERS reporting as RGPacboilers for at least the past 5 years.

Whether Violation is Ongoing

The boilers are not currently in use. They were identified by Ms. Weems (EGLE, AQD) in Spring 2023, and information was submitted for inclusion of the boilers in the facility's ROP, which is currently under renewal. The violation is not ongoing.

Summary of Actions Taken or Are Proposed to Be Taken, With Dates

The boilers are being added to the facility's ROP; the permit renewal application was submitted on October 14, 2022, with boiler conditions to be incorporated via Renewable Operating Permit Application C-001 sent to EGLE on June 12, 2023. The boilers are not currently in operation, and the facility is considering replacing them.

Due to the following three factors, we are considering if we may instead repair the existing boilers for this year:

- The requirement to prepare and submit an air permit application at least 6 months prior to site preparation and installation of any new boilers;

- The outcome from the request for quotation process (RFQ) as to which boilers we might install; and
- The need to have heat available for the facility by early November 2023.

The steps necessary for the expected repairs are included on Attachment A. The timeline to complete this work is November 30, 2023.

Steps Taken to Prevent Recurrence

We have built into our environmental program requirements to make sure any non-exempt boilers we may have at the site are included in the facility's air permit, prior to installation of the boilers at the site. Inteva Adrian's EHS and Facilities staff are also aware of this requirement, and we are committed to compliance with Federal and State regulations. To further prevent future non-compliance with the boiler operations at the facility, Inteva shall maintain required recordkeeping documents moving forward, and will submit the required certifications as necessary.

Please contact me if you have any further questions.

Sincerely,



Shannon Crosslan
Plant Manager

Attachment (1)

cc: Jenine Camilleri, Enforcement Unit Supervisor, EGLE AQD
Stephanie Weems, EGLE AQD
ERM

Attachment A – Inteva Adrian (B6027) Violation Notice Response Repairs Needed for Current Boilers

Unit No. A-35-1

- Furnish labor, material and equipment to replace all 72 - 2 ½" lower pass boiler tubes.
- Remove all 72 - 2 ½" boiler tubes.
- Clean the lower rear tube sheet, check for cracks and any distortion in the tube holes and advise if additional repairs are necessary.
- Clean loose scale and debris from the waterside in way of the second pass tubes.
- Clear remaining tube holes and install ferrules as required.
- Install 72- new 2 ½" tubes, same quality as original. Tube ends at the rear tube sheet to be expanded and seal welded, tubes ends at the front tube sheet to be expanded and beaded.
- Hydrostatically test boiler up to the safety valve setting.
- Disconnect 4" gas train and replace the damaged gas valve body that had water in it. Remove and replace the pilot valve that had water in it.
- Install new fireside gaskets and close the fireside of the boiler.
- Fill boiler and start-up.
- Complete a CSD-1 Safety Check and record findings.
- Set Combustion on the burner including before and after combustion readings.
- Necessary State of Michigan boiler repair permit, R-1 and inspection by authorized inspector.

Unit No. A-15-1

- Furnish labor, material and equipment to replace all 40 - 2 ½" second pass boiler tubes.
- Remove all 40 - 2 ½" boiler tubes.
- Clean the lower rear tube sheet, check for cracks and any distortion in the tube holes and advise if additional repairs are necessary.
- Clean loose scale and debris from the waterside in way of the second pass tubes.
- Clean remaining tube holes and install ferrules as required.
- Install 40 - new 2 ½" tubes, same quality as original. Tube ends at the rear tube sheet to be expanded and seal welded, tube ends at the front tube sheet to be expanded and beaded.
- Hydrostatically test boiler up to the safety valve setting.
- Install new fireside gaskets and close the fireside of the boiler. Fill boiler and start-up.
- Complete CSD-1 Safety Check and record findings.
- Set combustion on the burner including before and after combustion readings.
- Necessary State of Michigan boiler repair permit, R-1 and inspection by authorized inspector.

Target completion for boiler repairs: November 30, 2023.