



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
JACKSON DISTRICT OFFICE



DAN WYANT
DIRECTOR

March 13, 2014

CERTIFIED MAIL/ 7007 3020 0002 7737 4443
RETURN RECEIPT REQUESTED

Mr. Clive Smith
Inteva Products - Adrian Operations
1450 E. Beecher Road
Adrian, MI 49221

SRN: B6027, Lenawee County

Dear Mr. Smith:

VIOLATION NOTICE

On January 27, 2014, Inteva Products – Adrian Operations notified Air Quality Division (AQD) Jackson District staff on the Regenerative Thermal Oxidizer (RTO) not being operational, due to a fire that occurred earlier in the day. A phone meeting was held the same day to discuss the issues and it was determined that Inteva Products could continue to operate EU-CKIP#3 booths No. 1 and No. 2 without the RTO and still maintain compliance with the allowed volatile organic compound emission limits.

While the RTO is down, emissions from booths No. 1 and No. 2 will be exhausted to a 110 foot tall bypass stack. This stack was modeled for toxic air contaminants with similar coatings and met all applicable screening levels. The bypass stack is 80 feet higher than the primary stack, thereby also minimizing odor issues. The current non-solvent based coating material has a much lower VOC content than the solvent based coating evaluated for BACT (RTO required) during the permit, reducing the amount of emissions on a rolling time period basis. The only condition that will not be met is the required operation of the RTO while operating EU-CKIP#3, booths No. 1 and No. 2.

A follow-up meeting was held on February 4, 2014, to discuss the progress of restoring the RTO's operational status. At that time the cause was still unknown and the RTO carbon block replacements had been ordered. On February 25, 2014, Inteva notified our office that the RTO was put back in service on February 17, 2014.

The time period of the lines operating without the RTO was from January 27 through February 17, 2014. The company was informed that a letter of violation would be sent and that a Rule 912 response letter would be required to address the malfunction of the RTO. The Rule 912 letter was received on February 28, 2014.

Correspondence with Inteva indicated the following:

Process Description	Rule/Permit Condition Violated	Comments
EU-CKIP#3 booths No. 1 and 2 with required RTO control.	MI-ROP-B6027-2012 EU CKIP#3 IV. Design/Equipment condition 4.	The company operated these lines without the RTO operating due to a fire in the RTO. The company maintained compliance with allowed VOC limits during the time the RTO was not operating.

Inteva's Rule 912 response letter included the investigation as to the cause and abatement of the RTO malfunction and a demonstration of compliance with the applicable emission limit requirement. Inteva reported that the 12-month rolling total VOC emissions through January 2014 was 2.87 tons and Inteva estimates the 12-month rolling total through February 2014 will be 5.59 tons. The permit limit is 6.5 tons.

Thank you for your attention to resolving the violation cited above and for the cooperation that was extended to us during the process of addressing this event. The AQD, Jackson District Office is requesting additional information which details the VOC emission calculations and toxic screening evaluations. Please submit this information in writing no later than April 3, 2014.

If you have any questions regarding this letter of violation, please contact me at the number listed below.

Sincerely,



Sersena M. White
Senior Environmental Engineer
Air Quality Division
517-780-7844

cc: Mr. Scott Miller, DEQ
Mr. Michael Cannaert, EHSE, Inteva
cc/via email: Ms. Lynn Fiedler, DEQ
Ms. Teresa Seidel, DEQ
Mr. Thomas Hess, DEQ