

April 24, 2019

Mr. Sebastian Kallumkal  
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Air Quality Division  
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RE: Response to MDEQ's March 22, 2019 Violation Notice

On March 6, 2019, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of JVIS FH, LLC located at 23944 Freeway Park Drive, Farmington Hills, Michigan. The purpose of the inspection was to determine JVIS FH'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 9-12 and 90-14C.

On March 22, 2019 the MDEQ issued a violation notice alleging the following violations as a result of the March 6, 2019 inspection observations. Each alleged violation is described below followed by the JVIS FH response to that alleged violation.

Process Description	Alleged Rule/Permit Condition Violated	Comment
EU-COATINGLINE	PTI No. 90-14C, SC IC.1	One of the booths was missing exhaust filters while the parts are being coated
<b>JVIS FH RESPONSE:</b> JVIS FH has filter material readily available and it is typically changed at the end of the day such that it is ready for the next day. It is unclear why the operator did not replace the filter material in this particular booth when the other booths contained filter material. It appears to be an oversight on part of the operator. JVIS FH will retrain all operators to make sure they understand the importance of confirming the filter material is installed before using the booths.		

EU-BURNOFF	PTI No. 9-12, SC IV.3	The burnoff oven is not equipped with an interlock system that shuts down the primary chamber when the secondary chamber is not operating properly.
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**JVIS FH RESPONSE:** The next three alleged violations are regarding the burn-off oven. One response will address all three.

Upon acquiring certain assets of Eteron out of bankruptcy on July 30<sup>th</sup>, 2018, JVIS FH, LLC began systematically gutting and cleaning of the facility. Operations were limited as shown by our emissions records. In September 2018, approximately 215 lbs of VOCs were emitted. Contrast this with over 1000 lbs of VOCs in June 2017 under Eteron's operation and our last record of their emissions. This is important because the burn-off oven operation was also limited during August and September, 2019. As production decreases the need for oven operation also decreases.

On September 21, 2019 JVIS FH reported to the MDEQ that it was in the process of updating this facility and requested that PTI 9-12 be transferred to JVIS FH. Based on information provided by Eteron at the time of acquisition of EU-BURNOFF, it was believed that the burn-off oven was functioning properly and oven temperature records were continuously recorded since September 2017 using a USB datalogger. These records were periodically downloaded to Eteron's computer system by former Eteron Operations Manager, Don Stumpf.



Eteron USB datalogger

Since Eteron's oven maintenance records could not be located, JVIS FH proactively determined that a professional oven maintenance service was needed to inspect the burn-off oven, provide feedback on its operation, and make recommendations for repair or maintenance as necessary. Jackson Oven, Jackson, Michigan was selected. Below is an approximate timeline of our burn-off oven maintenance activities.

- October 11, 2018, Jackson Oven performed routine maintenance on the oven. Jackson Oven repaired the oven water misters and also concluded that there was not enough natural gas pressure at 3-inches of water to fully assess the oven and recommended a visit by the gas company to adjust the pressure.
- October 16, 2018 Consumers Energy visited the site to advise JVIS FH on where to connect a new gas line.
- October 16 - November 14, 2018 quotes were being obtained for the new gas line work.
- November 19, 2018, gas line work was awarded to and completed by Pheonix.
- Late November 2018 the USB datalogger installed by Eteron was removed for data down load. The data logger appeared to have failed and temperature records were unable to be retrieved.



- December 17, 2018 received a quote for Jackson Oven to adjust the gas pressure to the oven and install a new Monarch paperless data recorder. The Monarch recorder, records the temperature every 10 minutes.
- January 15, 2019 Jackson Oven on-site to adjust the gas pressure and install a monarch paperless power recorder (left). Subsequent testing was conducted on the oven to check its performance. After approximately two weeks, the data card was pulled and was determined to be faulty.

- Mid- February 2019, new data recorder failed. Jackson Oven was contacted and a new recorder ordered and covered under warranty.
- February 25, 2019 the new data recorder was installed.
- March 10, 2019 water valve failure occurred on the oven.
- March 11, 2019 Jackson Oven on-site to perform an emergency repair.
- March 12, 2019 water valve failure reoccurred.
- March 13, 2019 repair made by JVIS personnel.

With the exception of the oven malfunctions and maintenance described above, the burn-off has been operated as Eteron had operated it. When turned on, the main burner and afterburner came on at the same time and begin to heat at the same time. The MDEQ in its recent inspection informed JVIS FH that the afterburner should be energized first, reach temperature, then the primary chamber should energize. Although this is not how the oven had been previously operated, to correct this issue JVIS FH took immediate action as described below:

- March 29, 2019 Purchase Order issued to Jackson Oven to convert oven such that afterburner is energized first, reaches temperature, then primary oven energizes.
- April 17-19 Jackson Oven was scheduled to perform this conversion. Unfortunately, there was an issue with the obtaining the needed parts for the conversion on April 17. So the conversion was rescheduled for mid-May 2019.

As indicated above, the burn-off oven has not operated seamlessly. When JVIS FH purchased the oven it was represented that the oven operated properly. Nevertheless, JVIS FH has been proactive in its approach in determining the ovens operating capabilities through maintenance, testing and taking corrective action on issues discovered. To date JVIS FH has invested over \$15,000 to ensure the oven is operating in compliance with its permit.

EU-BURNOFF	PTI No. 9-12, SC IV.4 VI.1 and VI. 3	The burnoff oven is not equipped with a device to continuously monitor and/or record the secondary chamber temperature. The temperature records were not readily available for review.
<b>JVIS FH RESPONSE:</b> See above		

EU-BURNOFF	PTI No. 912, SC IV.1	The burnoff oven secondary chamber is required to be operated at a minimum of 1400° F. The summary records show that the operating temperature was below the required temperature.
<b>JVIS FH RESPONSE:</b> See above		

In addition to the above information it was requested that the facility conduct VOC content analysis of the coatings, as applied, using UESPA Method 24 to verify compliance with PTI No. 90-14C, SC II. 1 and organic HAP content analysis of the coatings, as applied, as described in 40 CFR 63.4541, using US EPA Method 311, pursuant to PTI No. 90-14C, SC V.1. This analysis is being ordered, the results will be provided to the MDEQ when received.

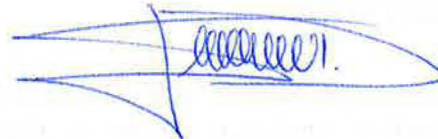
The DEQ also requested that records be maintained for the burn-off oven operations date, start time, for primary chamber and secondary chamber, duration of cleaning cycle, operator initial.

With the addition of the Monarch data, the burn-off oven operations data recording is automated. There is no log for the operator to initial.

Sincerely,



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Ms. Jenine Camilleri, MDEQ