

**DEPARTMENT OF ENVIRONMENTAL QUALITY  
AIR QUALITY DIVISION  
ACTIVITY REPORT: Scheduled Inspection**

P029348039

FACILITY: JVISFH, LLC		SRN / ID: P0293
LOCATION: 23944 FREEWAY PARK DRIVE, FARMINGTN HLS		DISTRICT: Southeast Michigan
CITY: FARMINGTN HLS		COUNTY: OAKLAND
CONTACT: Francisco Delgado , General Manager		ACTIVITY DATE: 03/06/2019
STAFF: Sebastian Kallumkal	COMPLIANCE STATUS: Non Compliance	SOURCE CLASS: MAJOR
SUBJECT: Onsite Inspection		
RESOLVED COMPLAINTS:		

On Wednesday, March 6, 2019, I, Sebastian Kallumkal, Michigan Department of Environmental Quality-Air Quality Division (MDEQ-AQD) staff conducted an unannounced targeted inspection at JVISFH, LLC. located at 23944 Freeway Park Drive, Farmington Hills, Michigan 48335. The purpose of the inspection was to determine the facility'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 administrative rules, and the Permits to Install (PTI) Nos. 9-12, and 90-14C.

The Stipulation for Entry of Final Order by Consent, AQD No. 13-2015 (CO-AQD No. 13-2015) was issued to the previous company, Eteron Incorporated, located at this site. JVIS USA had informed that they are a new company and they are not responsible for the consent order.

I visited the facility at about 9:30 AM. At the facility I met with Mr. Francisco Delgado, General Manager, JVISFH, LLC. I introduced myself, stated the purpose of the inspection and provided my credentials. During the pre-inspection, we discussed the process changes at the facility and permit conditions.

Their current customers are Maaco and JVIS which supply parts to Chrysler FCA. They are trying to have contract with Faurecia. He told me that they are only plastic parts coating currently. They are only operating Line 1 which has five adhesive coating booths with 2 flocking booths. The manual booths (previously installed) were removed. With the current configuration, the parts are adhesive coated in the booths, placed on a conveyor to the flocking booth, and then placed on a separate conveyor which takes the parts to the oven.

Francisco told me that they are going to replace the Line 1 with a new Line 1 which has a single conveyor system from adhesive coating booth to flocking booth to the oven. The new Line 1 would have two single booths on each side with five sprayers. Also, it would have two flocking booths with two sprayers in each booth. The new Line 1 would use the existing oven for the current Line 1. They plan to install the new line by the end of April 2019.

He told me that they are going to apply for a new PTI for this new process line (Line 1) and would also submit a HAP opt out permit at that time. I informed them about the pending Title V permit (ROP) application submitted by Eteron, Inc. and if JVISFH is not a major source of hazardous air pollutant (HAP) emissions, they would be able to cancel the submitted ROP application. I also indicated to them about the AQD Consent Order that was issued to Eteron, Inc. Francisco requested copies of both PTIs and CO. They were emailed to him later during week.

He told me that they don't wipe the parts before adhesive coating is applied. They only use water-based coatings in the Lines. The parts are covered using masks during adhesive coating.

Line 3 used to be called "Gormett Line" which was used for coating metal clips. Now it is used for small plastic parts coating and reworks. Line 3 has a separate adhesive coating booth, a flocking booth and a dedicated oven.

Line 2 (used for plastic parts coating; used to be called Menden Line) which was located along the wall was moved out to paint the wall. Line 2 also has an adhesive booth, flocking booth and an oven.

He told me that they don't wipe parts before coatings. The mask they use to cover parts before adhesive coatings are wiped using water rags if excessive adhesives get on it. These masks are cleaned in the burnoff oven after the shift.

The burnoff oven is used daily or every other day after the first shift. The facility has only one 8-hr shift per day, five days per week and has about 24 employees.

They use three different adhesives (all water based) for the coatings: one for ABS materials, one for poly propylene; one for reworks of both materials. I requested the SDS and EDS for the three adhesives. No organic solvents are added to the coatings.

Then, we discussed the burnoff oven operations. Mr. Doug Lightfoot, Quality Manager also joined our meeting. He indicated they many repairs to the burnoff oven. They are collecting the temperature data on a disc and copies to a computer. He indicated that they are not able to keep the secondary temperature constantly above 1400°F which is required by the PTI. The secondary chamber is capable of going between 1365 to 1465°F. The manufacturer also looked in to the process. I informed them that operating the secondary chamber below 1400°F could be a violation of the permit conditions. He provided me two copies of "Statistics for Oven", Channel A Summary (Primary chamber) and Channel B Summary (Secondary Chamber). The maximum temperature for the Channel B is 1398°F.

Next, Francisco accompanied for an inspection of the facility. I observed that few of the old booth were removed. The previous automatic line is now called Line 1. In couple of adhesive booths, the filters were in not in place, In one of the booths the filters were totally missing. I also pointed these issued to him. These were not corrected during my visit. I informed him that if they do not use the filters properly, the liquid can get out to the atmosphere through the stacks and could be deposited on public properties which can cause citizen complaints. During the inspection Line 1 and Gromett Line were being used.

The burnoff oven was not operating at the time of the inspection. It is equipped with a secondary chamber, and temperature monitors for both chambers.

After the site inspection, he contacted their environmental consultant, Jim Colmer, Contract Corporate EH&S Manager. We discussed voiding the consent order, applying for the new coating booth installations, HAP opt out limit and the burnoff oven operations. He stated that they did not take ownership of the Consent Order, so they don't need to void it. Regarding the PTI for the booths, he got all the information except booth data. Francisco indicated that they plan to start the operation of the booths by the end of April. I informed them that installing the booth without obtaining a permit could be a violation of the AQD rules. I informed them about the Construction Waiver option if they can justify it. Also, I informed them that unless they request cancelling the Title V permit application by April 30<sup>th</sup>, AQD will begin processing the application.

Regarding the burnoff oven operations, I informed them that they should start the primary chamber burner only after the secondary burner reach the required temperature of 1400°F. Operating the secondary burner below the required temperature while the primary burner is operating would be a violation of the permit. Jim mentioned that they are electronically collecting the temperature every minute. They are required to collect temperature readings every 15 minutes. He offered to send the electronic data to AQD.

PTI No. 90-14C

PTI No. 90-14C describes all the adhesive coating booths into EU-COATINGLINE comprising of 13 spray booths with exhaust filters for particulate matter control and 3 ovens (A, B, & Grommet).

Currently the facility only has 5 spray booths and 2 flocking booths in Line 1, the Grommet Line which one adhesive coating booth, one flock coating line, and an oven. The Menden is currently removed from site.

The facility uses water-based coatings. The SDS and TDS show that VOC content of the coatings are very low. JVIS FH operates this facility from August of 2018. The submitted records from these months show that VOC emissions, as of January 2019 were 2.06 tons (Limit = 15 tons per year) for the 6 months.

The highest VOC content of the three coatings used was <1.5 lb/gal(-water) for plastic coatings. The limit is 2.8 lb/gal (minus water) as applied. They told me they don't add any organic solvents to the coatings. The facility is not currently coating metal parts or business machine plastic parts.

During the inspection, I did not see any waste containers nearby. Based on the information provided, the spray guns are soaked in water overnight to be cleaned. The wastewater from this cleaning process is placed in a 55-gallon drum for disposal. When generated, waste adhesives are drummed and shipped off-site.

He told me that they replace the exhaust filters daily for the booths. Filters in one of the booths were missing and the other booths were not properly placed. This is violation of SC IV.1.

The facility is using HVLP guns for adhesive spray. The facility is keeping SDS, and technical data sheets for the coatings they are using. They are keeping records of coating usage, VOC content, and VOC emissions calculations.

#### FG-MACT-PPPP

The facility is using compliant material option to comply with the MACT limit. The lb HAP/lb coating solids is between 0.01 to 0.02 (limit = 0.16). No organic thinners, or cleaners used other than water. The facility's coating operations are classified as "Existing-General Use Coating".

The HAP content information according to the SDS and technical data sheets are less than 1.0 percent. JVISFH submitted semiannual compliance report on February 6, 2019. Facility's continuous compliance with the 40 CFR 63, Subpart PPPP will be monitored.

#### FG-MACT-MMMM & FG-NSPS-TTT

Facility is not conducting any metal parts coating or business plastics coating. So, the compliance with 40 CFR 63, Subpart MMMM and 40 CFR 60, Subpart TTT were not verified.

#### PTI No. 9-12

The facility is only cleaning masks used in the adhesive coating of automotive plastic parts. The adhesives used is water based and of low VOC content. I observed that the burnoff oven is equipped with an afterburner. The primary and secondary chambers are equipped with temperatures monitors. The calibration of the thermocouples was not verified during inspection.

Based on the discussions during the inspection, the burnoff oven is not equipped with an interlock system for the primary chamber and secondary chamber temperature such that the primary chamber burner would be shutdown if the secondary chamber temperature is below 1400oF or not operating properly. This is a violation of SC IV.3. The burnoff oven is not equipped with a device that can continuously monitor and record the secondary burner temperature. This is a violation of SC IV.4, VI.1 and VI.3. They indicated that they are monitoring the temperature every minute. The temperature records were not readily available to review. The temperature summary sheet provided indicates that the secondary chamber temperature does not reach 1400°F. This is a violation of SC IV.1. The burnoff is also required to have an automatic temperature control system per SC IV.2. This was not verified.

Conclusion: The burnoff oven is not operated in compliance with PTI No. 9-12 and the coating booth filters were not installed properly (PTI No. 90-14C). A violation notice seeking compliance will be sent. To verify compliance with the 40 CFR 63, Subpart PPPP, Compliant Materials Option, facility will be requested to conduct US EPA Method 311 and Method 24 tests for its adhesive coatings.

NAME Sebastian Kallunkal

DATE 3/26/2019

SUPERVISOR

Joyce