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

P029353661

FACILITY: JVISFH, LLC		**SRN / ID:** P0293
LOCATION: 23944 FREEWAY PARK DRIVE, FARMINGTN HLS		**DISTRICT:** Southeast Michigan
CITY: FARMINGTN HLS		**COUNTY:** OAKLAND
CONTACT: Angie Valentino , HR Manager		**ACTIVITY DATE:** 02/12/2020
STAFF: Sebastian Kallumkal	**COMPLIANCE STATUS:** Compliance	**SOURCE CLASS:** SM OPT OUT
SUBJECT: Onsite Inspection		
RESOLVED COMPLAINTS:		

On Wednesday, February 12, 2020, I, Sebastian Kallumkal, Michigan Dept. of Environment, Great Lakes and Energy-Air Quality Division (EGLE-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 90-14D.

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. AQD had determined that JVISFH, LLC. is a new company at this location and it is not responsible for the contents of this consent order. The permittee was informed of this decision.

I visited the facility at about 11:45 AM. At the facility, I met with Ms. Angie Valentino, HR Manager. AQD contact Mr. Francisco Delgado, General Manager, JVISFH, LLC was not available on that day. 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. Mr. Raul Sanchez, Maintenance Manager also joined the meeting. Mr. Doug Lightfoot, Corporate Quality Manager also present during the pre-inspection meeting.

The facility's current customers are Maaco and JVIS, USA, LLC. which supply parts to Chrysler FCA. They told me that they are only coating plastic parts currently. They have about 29 employees, operate M-F, 1 shift (6:00 AM to 2:00 PM), and operate on Saturdays for taking inventory.

Raul explained to me about the burnoff oven. They operate it a couple of times a day with mostly from 4:00 to 7:00 PM. It is used to clean the spray masks which are used in the coating of parts. He informed me that they installed an interlock system which starts the primary oven burner after the secondary burner reaches 1400^{o}F. The oven has only one switch for the primary and secondary chambers. The primary oven operates around 800^{o}F.

The operating procedure includes:
1. Placing parts in the primary oven
2. Turn on the switch
3. Secondary oven reaches 1400^{o}F.
4. Primary oven turns on automatically.

The cleaning cycle is around 3 hours long. I requested the daily temperature readings for the oven. Mr. Lightfoot told me that they are monitoring the temperatures daily during operations. They don't have all the records on a spreadsheet on a spreadsheet format for quick view. Mr. Jim Colmer, Corporate EHS Manager also told me that the records are available for review for any day the oven operated.

We also reviewed PTI No. 90-14D for the coatings of parts. They provided me the emission records from August 2018. They accompanied me for an inspection of the facility. First, we inspected the burnoff oven. It was at the end of a cleaning cycle.

Currently, the facility has only the old "Gormet Line" which was used for coating metal clips is now used for plastic parts coating and reworks. It has 1 glue (adhesive) booth, 2 flocking booths, and an oven. They are using adhesive, 20F#1680-B Black Flock Adhesive, a water based coating, for polypropylene parts in this booth. They plan to move this process also to the new system eventually.

The new line has 4 adhesive spray booths, 2 flocking booths and an oven. The parts are loaded on conveyer from the booths, to the oven, to inspection and to the packaging. They use 20F1680-B, Black Flock Adhesive for poly propylene parts and 20F1341 Black Flock Adhesive for ABS Parts. They provided me the SDS and certificate of analyses for these coatings. They are no longer using Black Flock Adhesive 20F1251. The parts are not wipe cleaned before being coated. Raul told me that they replace the booth filter twice a day and the spent filters are discarded to the dumpster. The old automatic lines (4 booths) are disconnected and discontinued. A few of the booths are still onsite.

After finishing the inspection, I informed them that I would be back to inspect the operation of the burnoff oven.

On Tuesday, March 3, 2020, at about 9:30 AM, I visited the facility again to inspect and verify the operation of the burnoff oven. I met Angie and Raul at the facility. I informed them of the purpose of my inspection. They accompanied me to the oven. The oven was not operating at that time. I requested Raul to show the operation. He closed the primary oven door with no parts in it and turned on the switch. The temperature counter rapidly started counting the numbers and when the number reached 1415 (set point 1415^{o}F), the primary chamber burner turned on. The primary chamber temperature slowly started increasing. After it reached the set temperature about 800^{o}F, he turned off the oven.

When the switch was turned on, the secondary chamber temperature counter started running and I was not sure whether the counter (the temperature monitor) was monitoring the actual secondary chamber temperature. I told them I wasn't sure if the temperature monitor is measuring the secondary chamber temperature.

Shortly after my visit to the facility, Mr. Jim Colmer, Corporate EHS Manager contacted me to discuss my concern. He told me that the manufacturer checked out the oven and verified that the oven is working properly. I also discussed the concern about not having daily temperature records for the oven. He told me he can send me the temperature readings for any day I need. They don't have the capability currently to compile all the data together as a spreadsheet. I informed him that they need to keep records of the daily temperature, for at least five years, to comply with the permit requirements. He told me he will work on it. Later, he sent me the temperature records for February 12, 2020. The records showed that the primary chamber started after secondary chamber reached 1400oF.

Regarding the quick rise in secondary oven temperature, in an email dated March 10, 2020, he indicated that when the facility did the oven conversion in May of 2019, a damper was added to help reduce temperature fluctuations in the oven caused by outside temperatures and it could be a reason for the quick climb in temperature.

PTI No. 9-12 (Burnoff Oven)

The facility is only coating 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. Natural gas is used as the fuel. The primary and secondary chambers are equipped with temperatures monitors. The calibration of the thermocouples was not verified during inspection.

From the demonstration of the burnoff oven operation, it appears to be equipped with an interlock system for the primary chamber and secondary chamber temperature such that the primary chamber burner would be shut down if the secondary chamber temperature is below 1400oF or not operating properly. The burnoff oven is equipped with a device that can continuously record the secondary burner temperature while it is operating. Records of any operating day is available, however, as discussed earlier, all records are not simultaneously available for review such as in a spreadsheet. I discussed this concern with Mr. Colmer, and he is working on this.

PTI No. 90-14D

EUCOATINGLINE:

This is an opt out permit with Hazardous Air Pollutant limits. This PTI allows 7 spray booths and two ovens. The facility has two coating lines. One (old Gromet Line) with one adhesive spray booth and an

oven, and the new line with 4 adhesive spray booths and an oven. The parts are covered using masks during adhesive coating.

They currently use two different adhesives (all water based) for the coatings: one for ABS materials, and one for poly propylene parts. No organic solvents are added to the coatings to adjust viscosity. They provided me the certificates of analyses and SDS for these coatings.

From the SDS, the VOC content of the coatings are less than 1.0 lb/gal. (0.504 lb/gal-20F1341; <1.0 lb/gal-20F1680). The VOC emissions calculated based 12-month rolling period as determined at the end of each calendar month were 1.17 tons as of January 2020 (limit =3.5 tpy).
The Glycol Ether DB emissions calculated based 12-month rolling period as determined at the end of each calendar month were 0.48 tons as of January 2020 (limit =0.6 tpy).

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 twice daily for the booths. The spent filters are discarded in the dumpster. The facility is using HVLP guns for adhesive spray.

The facility has not requested approval from for the use of VOC content information from the manufacturer's formulation data. The facility is keeping SDS, and certificates of analyses for the coatings they are using. They are keeping records of coating usage, VOC and Glycol Ether DB contents, and VOC and Glycol Ether DB emissions calculations. Later, Jim provided Method 311 and Method 24 analyses results for the coatings.

Jim sent the notification of completion of the coating line installation on April 14, 2020 (SC VII.1). The labeling of the emission unit is completed yet. He agreed to finish the labeling and inform AQD as soon as the current COVID-19 Executive Orders expire and everyone starts normal work schedule.

FGFACILITY:
The permit limits facility's individual and aggregate HAPs to 8.9 tpy and 22.4 tpy, respectively. The records show that aggregate HAP emissions as of January 2020 was 1.06 tons per year based on a 12-month rolling period calculated monthly.

The facility is keeping records of HAP content, volume of HAP containing material used, individual and aggregate HAP emissions calculations determining the monthly emission rate in tons per month and 12-month rolling HAP emission rates in tons per year.

Conclusion:

From the inspection and reports review, the JVISFH, LLC appears to be in compliance with applicable air quality regulations.

NAME Sebastian Kallenkal DATE May 19, 2020 SUPERVISOR Joyce K