



GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
SOUTHEAST MICHIGAN DISTRICT OFFICE



LIESL EICHLER CLARK
DIRECTOR

March 22, 2019

Mr. Francisco Delgado
General Manager
JVIS FH, LLC
23944 Freeway Park Drive
Farmington Hills, Michigan 48335

SRN: P0293, Oakland County

Dear Mr. Delgado:

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 this 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.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
EU-COATINGLINE	PTI No. 90-14C, SC IV.1	One of the booths was missing exhaust filters while the parts are being coated.
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.
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.
EU-BURNOFF	PTI No. 9-12, 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.

The facility shall conduct VOC content analysis of the coatings, as applied, using USEPA 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.

The facility shall also verify that the burnoff is equipped with an automatic temperature control system for the primary chamber and secondary chamber and the system is operating properly.

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Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by April 12, 2019 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the violations occurred; an explanation of the causes and duration of the violations; whether the violations are ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violations and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

The response shall also include the following:

1. The facility shall conduct VOC content analysis of the coatings, as applied, using USEPA 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.
2. The facility shall also verify that the burnoff is equipped with an automatic temperature control system for the primary chamber and secondary chamber and the system is operating properly.
3. The facility shall keep records of the records of the burnoff oven operations (date, start time for primary chamber and secondary chamber, duration of the cleaning cycle, operator initial).

Please submit the written response to the DEQ, AQD, Southeast Michigan District, at 27700 Donald Court, Warren, Michigan 48092 and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at the DEQ, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If JVIS FH believes the above observations or statements are inaccurate or do not constitute violations of the applicable legal requirements cited, please provide appropriate factual information to explain your position.

Thank you for your attention to resolving the violations cited above and for the cooperation that was extended to me during my inspection of JVIS FH. If you have any questions regarding the violations or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,



Sebastian G. Kallumkal
Senior Environmental Engineer
Air Quality Division
586-753-3738

cc: Ms. Mary Ann Dolehanty, DEQ
Dr. Eduardo Olaguer, DEQ
Mr. Christopher Ethridge, DEQ
Ms. Jenine Camilleri, DEQ
Ms. Joyce Zhu, DEQ