



June 10, 2019

Mr. Sebastian Kallumkal
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Michigan Department of Environmental Quality
Air Quality Division
27700 Donald Court
Warren, Michigan 48092-2793

RE: Follow-up to JVIS FH's April 24, 2019 Response to MDEQ's March 22, 2019 Violation Notice (VN)

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 VN alleging the following violations as a result of the March 6, 2019 inspection observations. On April 24, 2019 JVIS FH responded to the March 22, 2019 VN. This letter is a follow-up response to our April 24, 2019 letter specifically as it relates to the burn-off oven.

In the March 22, 2019 VN JVIS FH provided a timeline of its activities since acquiring the burn-off oven out of bankruptcy from Eteron on July 30th, 2018. However, in the March 22, 2019 VN the MDEQ indicated that the afterburner should be energized first and reach temperature prior to the energizing of the primary oven.

To address the MDEQ's comment, the burn-off oven had to be converted to allow the afterburner to energize first and not allow the primary oven to energize until the afterburner reached 1400 °F. To achieve this JVIS FH did the following:

- 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.
- May 10, 2019 Jackson Oven arrived on site and began the conversion.
- May 18, 2019 Jackson Oven completed the conversion.
- May 20, 2019 The burn-off oven is functioning requested by MDEQ (now EGLE).

Currently, after each day of oven use, the digital temperature records from the paperless data recorder are printed to hardcopy and are stored on the JVIS FH shared drive.

Sincerely,

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CC: Ms. Joyce Zhu – MDEQ
Ms. Jenine Camilleri, MDEQ