

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

P029346045

FACILITY: JVIS Farmington Hills, LLC.		SRN / ID: P0293
LOCATION: 23944 FREEWAY PARK DRIVE, FARMINGTN HLS		DISTRICT: Southeast Michigan
CITY: FARMINGTN HLS		COUNTY: OAKLAND
CONTACT: Jim Colmer , Contract Corporate EH&S Manager		ACTIVITY DATE: 09/06/2018
STAFF: Sebastian Kallumkal	COMPLIANCE STATUS: Unknown	SOURCE CLASS: MAJOR
SUBJECT: Onsite Inspection		
RESOLVED COMPLAINTS:		

On Thursday, September 6, 2018, Shamim Ahmed, Joyce Zhu, and I, Sebastian Kallumkal, Michigan Department of Environmental Quality-Air Quality Division (MDEQ-AQD) staff conducted an unannounced target inspection at Eteron Incorporated 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, the Stipulation for Entry of Final Order by Consent, AQD No. 13-2015 (CO-AQD No. 13-2015), and Permits to Install (PTI) Nos. 9-12, and 90-14C.

We visited the facility at about 9:30 AM. At the facility we met with Mr. Francisco Delgado, Corporate Supplier Quality Engineer, JVIS USA, LLC. We introduced ourselves, stated the purpose of the inspection and provided our credentials. He informed us that JVIS USA, LLC. bought Eteron Incorporated, which was in bankruptcy, about three weeks ago. He told us that the facility is under reconstruction even though they are using a few of the coating lines. He indicated that he does not know where the records for the previous facility is. We told him that he can provide us the records later, but we conduct an inspection of the processes on that day. He informed us that that he would prefer that we conduct the walk through of the plant while the corporate environmental person (Timothy Paton) was onsite. We agreed and scheduled the inspection of following Tuesday, September 11, 2018. I provided him copies of both permits, and the consent order. Later, I contacted Tim Paton and told him about the inspection. I also provided him and Tim the contact info for the review of the previous facility files under the Freedom of Information Act (FOIA).

On Tuesday, September 11, 2018, at about 9:30 AM, Shamim and I visited the facility. We met with Mr. Jim Colmer, P.E., Director of Operations, BB&E Consulting Engineers & Professionals, Mr. Timothy Paton, EHS Coordinator/Continuous Improvement Coordinator, JVIS USA, LLC., Mr. Doug Lightfoot, Corporate EHS Manager, JVIS USA, LLC., Mr. John Kim, JVIS USA, LLC., and Francisco Delgado. Mr. Colmer is employed by BB&E which is a consulting company. He is working for JVIS USA, LLC. as Corporate EH&S Manager under contract. We introduced each other. Mr. Colmer provided me a letter which is required under Rule 219 regarding ownership change. However, the letter did not include the AQD Consent Order, so I asked him to revise and sent the corrected letter to AQD.

Mr. John Kim, who owned the previous company, Eteron, briefly explained his facility's history with AQD. I told them about the current status related to escalated enforcement actions. Due to the facility's ongoing non-compliance with AQD regulations escalated enforcement actions against this facility are handled by the Michigan Attorney General's office. Mr. Colmer explained that they don't have the operations records (coating usage, emissions calculations, etc.) to verify compliance with the permit requirements. They requested time to gather the information and provide necessary calculations. John told us that they have been using water based, MACT compliant adhesive since July 2017 and provided the SDS for it.

We also discussed the USEPA's rescinding of "Once In-Always In" policy regarding 40 CFR Part 63, MACT standards. They are aware that currently they have option of applying for a HAP (Hazardous Air Pollutants) opt-out permit and opt-out of the 40 Part 63, MACT standards (Subparts PPPP and MMMM) and Title V permit which the facility is currently subject to. I informed them that the rescinding of this policy is not final and has been challenged. MDEQ-AQD is not aware about how the facility's compliance status would be if the policy is reinstated.

Next, they accompanied us for an inspection of the facility's operations. They removed the previously installed "Manual Line", and "New Manual Line". They only have "Line 1" which has five adhesive



coating booths, two flocking spray booths, and curing oven, "Grommet Line" which has its own oven, and a rework line (Menden Line). The coating lines (Line 1 and Menden Line) were in operation at the time of the inspection.

The burn-off oven was not operating at that time. He told me that they are keeping records of its operation.

After discussing the facility's status with AQD District Supervisor, it was decided that the facility would be given time to gather records and show compliance status. The facility would be inspected at a later time to verify compliance.

On Wednesday, September 13, 2018, I informed Jim about this decision. I also explained that they could modify the current PTI to reflect the change in facility's operations and that if they install new booths, they need to apply for a permit to install prior to the installation of those booths.

**Conclusion:** The compliance status for this facility under the new management is not verified. Facility is required to submit records to evaluate the compliance status. The facility would be inspected later in this calendar year.

NAME Deborah Kallambal

DATE 9/13/2018

SUPERVISOR Joyce BL

