



GRETCHEN WHITMER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF  
ENVIRONMENT, GREAT LAKES, AND ENERGY  
KALAMAZOO DISTRICT OFFICE



DANIEL EICHINGER  
ACTING DIRECTOR

March 7, 2023

Tim Lane, Plant Manager  
JVIS USA, LLC  
1285 N. Crystal Avenue  
Benton Harbor, MI 49022

SRN: N3747, Berrien County

Dear Tim Lane:

**VIOLATION NOTICE**

On February 28, 2023, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of JVIS Manufacturing, LLC (Facility) located at 1285 N. Crystal Avenue, Benton Harbor, Michigan. The purpose of this 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 Air Pollution Control Rules; and the conditions of Permit to Install (PTI) number 202-95E.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
EUPLASTICPARTS	Special Condition IV.1 of PTI No. 202-95E	See Comment 1 Below
EUPLASTICPARTS	Special Condition IV.5 of PTI No. 202-95E	See Comment 2 Below
EUPLASTICPARTS	Special Condition V.1 of PTI No. 202-95E	See Comment 3 Below
EUPLASTICPARTS	Special Condition V.3 of PTI No. 202-95E and Condition 9.A of Consent Order No. 16-2016	See Comment 4 Below

**Comment 1:** Although the facility has installed the water curtain control system in each spray booth of EUPLASTICPARTS, it doesn't appear that they've been maintaining and operating them properly. They were not in use during the inspection do to piping being plugged and parts to repair the issue are supposedly on order.

**Comment 2:** Although the facility has installed the Non-Fugitive Enclosure (NFE) as required in EUPLASTICPARTS, staff cannot make a compliance determination if it's being maintained and operated properly since they haven't done any air flow testing into the NFE since April of 2019 according to AQD district file records.

**Comment 3:** The facility has not determined the VOC content of any of their coatings as applied or received using the federal Reference Test Method 24. The facility has also not

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requested nor received approval from the AQD District Supervisor to use manufacturer's formulation instead.

**Comment 4:** The facility has not notified the AQD about nor does it appear that they've been conducting the semi-annual air flow testing into the NFE enclosure. According to AQD district file records, the last notification and/or testing done on the NFE was back in April of 2019.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by April 4, 2023. 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.

Please submit the written response to EGLE, AQD, Kalamazoo District, at 7953 Adobe Road, Kalamazoo, Michigan 49009 and submit a copy to Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If the Facility 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 the Facility. 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,



Matt Deskins  
Environmental Quality Analyst  
Air Quality Division  
269-303-8326

cc: Annette Switzer, EGLE  
Christopher Ethridge, EGLE  
Brad Myott, EGLE  
Jenine Camilleri, EGLE  
Rex Lane, EGLE