

3 April 2014

Scott Miller  
Michigan Department of Environmental Quality  
Air Quality Division - Jackson District Office  
301 E. Louis Glick Highway  
Jackson, MI 49201

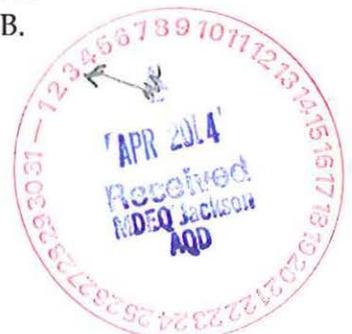
Re: Inteva Products - Adrian, Michigan  
Letter of Violation - 13 March 2014

Dear Mr. Miller:

The purpose of this letter is to provide additional information requested by the MDEQ in the Letter of Violation dated 13 March 2014 and subsequent phone conversation on 20 March 2014. The information pertains to the recent abnormal conditions at Inteva Products' facility (Inteva) located at 1450 East Beecher Street in Adrian, Lenawee County, Michigan.

On January 27<sup>th</sup>, at approximately 4:00 am during startup of the abatement system on EU-CKIP#3 booths No. 1 and 2, the sprinkler in the Desorption Unit containing carbon filter blocks was set off. The sprinklers were set off due to an overtemp condition that ignited the carbon blocks. The carbon blocks did not produce flames, but rather smoldered and glowed red. Although we were not able to replicate the condition during the investigation and the equipment appeared to be operating properly, we believe that a damper closed too slow or was stuck in the open position allowing the heat to build up in the Desorption Unit. The only condition that we were not able to replicate was the extreme cold that occurred the day of the incident and, since the abatement system is located outdoors, may have been the key factor for this type of malfunction.

During the root cause analysis and repair work on the abatement system, emissions from the EU-CKIP#3 booths No. 1 and 2 were sent uncontrolled to the bypass stack. Location of the bypass stack is included in Attachment B.



The following table provides an update to the emissions estimate through February 2014 using actual coating usages. The raw data is in Appendix C.

| Month  | Abatement System | Gallons of Coatings Used | VOC Emissions |      |                      |
|--------|------------------|--------------------------|---------------|------|----------------------|
|        |                  |                          | pounds        | tons | 12 Month Total, tons |
| Jan-13 | In Use           | 2079.1                   | 158.2         | 0.08 |                      |
| Feb-13 | In Use           | 2196.6                   | 167.3         | 0.08 |                      |
| Mar-13 | In Use           | 2055.7                   | 156.6         | 0.08 |                      |
| Apr-13 | In Use           | 2604.5                   | 198.3         | 0.10 |                      |
| May-13 | In Use           | 2316.1                   | 176.4         | 0.09 |                      |
| Jun-13 | In Use           | 2090.6                   | 159.2         | 0.08 |                      |
| Jul-13 | In Use           | 1530.3                   | 116.7         | 0.06 |                      |
| Aug-13 | In Use           | 2677.6                   | 204.0         | 0.10 |                      |
| Sep-13 | In Use           | 2454.7                   | 186.9         | 0.09 |                      |
| Oct-13 | In Use           | 3415.4                   | 259.8         | 0.13 |                      |
| Nov-13 | In Use           | 2372.7                   | 180.6         | 0.09 |                      |
| Dec-13 | In Use           | 2372.7                   | 133.9         | 0.07 | 1.05                 |
| Jan-14 | In Use           | 1470.4                   | 112.5         | 0.06 |                      |
|        | Offline          | 739.6                    | 3300          | 1.65 | 2.68                 |
| Feb-14 | Offline          | 1282.1                   | 5400.2        | 2.70 |                      |
|        | In Use           | 746.9                    | 57.8          | 0.03 | 5.33                 |

In addition to the emissions update, we have also attached the air toxics analysis (Attachment A) completed without the use of the abatement system. The analysis demonstrates that compliance with the air toxics regulations was maintained during the period of operation without the abatement system.

The MDEQ also requested information concerning the maintenance requirements for the abatement system. Inteva has implemented all of the manufacturers' recommended preventative maintenance (PM) items and tracks the completion of those items within its PM software - PLEX. According to PLEX, all of the PMs for the abatement system were up to date.

Because the Abatement system is located outdoors and is exposed to the weather and in light of this incident which we are attributing to the weather, Inteva has begun to investigate the need for building a permanent enclosure around the unit. Inteva has reviewed the economic feasibility of continuing to operate the abatement control system since the facility is no longer using the solvent-based adhesion promoter other than on an extremely limited basis for "service" parts. This analysis was completed in March and showed that it was not economically feasible to operate the abatement system when emissions are at or less than 45 tons per year. This information was used in the Air Permit Application submitted on 19 March 2014 for modifying the

permit for EU-CKIP#3 booths No. 1 and 2 to allow some usage of the coating booths without the use of the abatement system.

Should you have any further questions, please contact Michael Canaert, EHS Manager for Inteva, at 517-265-4226 or Matthew Kwiatkowski, Senior Project Manager for ERM, at 616-738-7396.

Sincerely,

A handwritten signature in black ink that reads "Clive Smith". The signature is written in a cursive style with a large initial "C" and a stylized "S".

Clive Smith  
*Plant Manager*

Attachments (2)

cc: Sersena White - MDEQ-AQD  
Adam Bates - Inteva Products  
Matthew Kwiatkowski - ERM  
File