

15 October 2019

Department of Environment, Great Lakes & Energy
Air Quality Division
Stephanie Weems
301 E. Louis Glick Hwy
Jackson, MI 49201

RECEIVED
MDEQ - JACKSON

OCT 15 2019

AIR QUALITY DIVISION

Re: SRN: B6027 Violation Notice

Ms. Weems,

In response to the violation notice dated 24 September 2019 for Inteva Products, Adrian, Michigan, is providing the following information for the cited, alleged violation of Process Description EU-Paint 3, otherwise referred to as the Two Tone Paint Booth.

Dates the Violation Occurred – The data logger malfunctioned and failed to log data from 01/01/19 thru 01/28/19, 02/04/19 thru 04/18/19 and 6/10/19 thru 6/30/18; a total of 121 days. However, the paint line only ran 29 days during these periods so the alleged violation to maintain oven temperature records only occurred on the following dates: 01/02/19 thru 01/28/19, 2/01/19, 2/4/19 thru 2/6/19, 2/11/19, 2/27/19, 3/14/19, 4/30/19, and 6/20/10. Due to personnel changes at the facility, Inteva is continuing to search other storage locations for the data and will update EGLE if any additional data is discovered.

Explanation of the cause and duration – Inteva contacted the logging equipment manufacturer for support, and reprogrammed the data logger to capture temperatures every 15 minutes, and at 24 hour intervals. The data transfer to the SD card was also reprogrammed for 24 hour uploads. The recorder was tested and confirmed to be functioning properly. The root cause was deemed to be associated with set point malfunctions.

Is the violation ongoing – After the reprogramming of the data logger was completed, Inteva verifies the violation is not ongoing. The original Two Tone Spray Booth data recording device was repaired and functioning as of 4:00 pm Friday, October 11, 2019.

Summary of actions taken with dates - A new recording system was installed and is part of Inteva's overall plant database Trace system. The data base is functional as of 8:30 am, Monday, October 14, 2019. It reads temperature in the Two Tone Spray Booth and logs temperatures every 10 minutes. The original data logger will continue to operate and be used for back up purposes only.

What steps are being taken to prevent a reoccurrence - Inteva will continue to operate both oven temperature recording devices. The data logger will be accessible for reporting purposes by Perry Mulhollen and weekly checks are being set up on a calendar for reminders. The system now alarms when oven temperatures fail to log (both audible and flashing light above the panel) and the panel will display a date/time that the trace failed across the middle of the screen.

In addition, Inteva is developing a training process for all Operators and Supervisors who will be operating the two tone spray booth. The training will encompass the action requirements under alarm mode, which will include contacting the Department Supervisor and Engineering group for support. Supervisors will be trained the week of October 14, 2019. Operators will be trained when they return from Lay Off.

If you have any questions or need further information you can reach out to Perry Mulhollen at 517-265-4343 or PMulhollen@intevaproducts.com.

Sincerely,



Mark Ellerbrock
Plant Manager
Inteva Products, LLC – Adrian Operations
1450 E. Beecher St.
Adrian, MI 49221

cc: Ms. Jenine Camilleri, EGLE
Mr. Perry Mulhollen, Inteva
Mr. Matthew Kwiatkowski, ERM