

STATE OF MICHIGAN DEPARTMENT OF ENVIRONMENT, GREAT LAKES, AND ENERGY

JACKSON DISTRICT OFFICE



July 12, 2023

VIA EMAIL ONLY

Shannon Crosslan, Plant Manager Inteva Products – Adrian Operations 1450 East Beecher Street Adrian, MI

Dear Shannon Crosslan:

VIOLATION NOTICE

SRN: B6027, Lenawee County

On June 21, 2023, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), requested additional information from Inteva Products – Adrian Operations located at 1450 East Beecher Street, Adrian, Michigan. The purpose of this request was to determine Inteva's compliance with the requirements of 40 CFR Part 63 Subpart DDDDD – National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters.

During the review, staff noted the following:

| | Rule/Permit Condition | |
|--|---|---|
| Process Description | Violated | Comments |
| EUBoiler #35-1 (Cleaver Brooks 14.645 MMBtu/hr) | 40 CFR 63.7540(a)(10)(vi)(A); 40 CFR 63.7540(a)(10)(vi)(B); 40 CFR 63.7540(a)(10)(vi)(C); 40 CFR 63.7550(c)(1); 40 CFR 63.7555(a)(1); 40 CFR 63.7560(b); 40 CFR 63.7560(c); | Unable to produce records to show compliance with the maintenance/tune-up requirements under 40 CFR Part 63, Subpart DDDDD. |
| EUBoiler #35-1 (Cleaver Brooks 14.645 MMBtu/hr) | 40 CFR 63.7550(b); 40 CFR 63.7550(h)(3) | Failure to submit tune-up compliance reports as specified in 40 CFR Part 63, Subpart DDDDD |
| EUBoiler (Cleaver Brooks 6.2275 MMBtu/hr) | 40 CFR 63.7555(a)(1); 40 CFR 63.7560(b); 40 CFR 63.7560(c) | Unable to produce records to show compliance with the maintenance/tune-up requirements under 40 CFR Part 63, Subpart DDDDD. |

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| EUBoiler (Cleaver Brooks 6.2275 MMBtu/hr) | 40 CFR 63.7550(b); 40 CFR 63.7550(c)(1); 40 CFR 63.7550(h)(3) | Failure to submit tune-up compliance reports as specified in 40 CFR Part 63, | |
|--|---|--|--|
| | | Subpart DDDDD | |

For this request, Inteva was unable to produce the required monitoring/recordkeeping records to show compliance with the above referenced federal regulation. Additionally, compliance reports must be submitted to AQD and EPA annually. Historically, these reports have not been submitted.

Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by August 2, 2023, (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the violation occurred; an explanation of the causes and duration of the violation; whether the violation is ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violation 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, Jackson District, at 301 East Louis Glick Highway, Jackson, Michigan 49201 and submit a copy to Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Inteva 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 violation cited above and for the cooperation that has been extended to me during my correspondence with Inteva. If you have any questions regarding the violation or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely.

Stephanie Weems Environmental Quality Analyst Air Quality Division 517-416-3351

cc: Perry Mulhollan, Inteva Products – Adrian Operations Annette Switzer, EGLE Christopher Ethridge, EGLE Brad Myott, EGLE Jenine Camilleri, EGLE Scott Miller, EGLE