

March 31, 2023

Mr. Matt Deskins
Environmental Quality Analyst
Michigan Department Environment, Great Lakes, and Energy
Kalamazoo District Office
Air Quality Division
7953 Adobe Road
Kalamazoo, MI 49009

RECEIVED
APR 03 2023
AQD - KALAMAZOO

Re: Violation Notice, JVIS Manufacturing LLC (JVIS)
Berrien County
Site Identification Number MIR 000 013 623

Dear Mr. Deskins,

BB&E, Inc. (BB&E) has prepared this written response on behalf of JVIS Manufacturing, LLC (JVIS Crystal) regarding the March 7, 2023, Violation Notice issued by the Michigan Department of Environment, Great Lakes, and Energy (EGLE). During the inspection, EGLE noted alleged violations of Special Condition IV.1 of PTI No. 202-95E; Special Condition IV.5 of PTI No. 202-95E; Special Condition V.1 of PTI No. 202-95E; Special Condition V.3 of PTI No. 202-95E; and Condition 9.A of Consent Order No. 16-2016.

The following written response details the alleged violations noted by EGLE during the February 28, 2023, site inspection and responses/corrective actions taken by JVIS Crystal.

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 due to piping being plugged and parts to repair the issue are supposedly on order.

Response: The water curtains in the EUPLASTICPARTS spray booths were repaired and are operating as of March 18, 2023. JVIS Crystal took three photos and one video as documentation of the repaired water curtain. See Attachment for photographic documentation of the repair. A video (.MOV format) of the water curtain in operation is attached to the email for which this letter is attached.

JVIS Crystal investigated the plugged paint line to determine the root cause. Synergy, the paint system specialist in charge of maintaining the water curtain, is required to drain water tanks, remove debris, and clean the tanks on a weekly basis, as determined by a maintenance calendar provided to the vendor by JVIS Crystal. JVIS Crystal believes that Synergy was not conducting the required weekly maintenance, which caused buildup that plugged the water lines and pump. Moving forward, JVIS Crystal will uphold the maintenance calendar and improve the maintenance process by validating the scope of work during a meeting with Synergy and implementing an internal inspection where an employee of JVIS Crystal is to sign off that the items on the maintenance calendar are completed as required. Additionally, JVIS Crystal will review its Malfunction Abatement Plan (MAP) for opportunities for improvement based on its water curtain findings.

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.

Response: JVIS Crystal notified the EGLE AQD via email on March 9, 2023, that it would perform a smoke test on April 6, 2023. JVIS Crystal will submit a report of smoke test results to the EGLE AQD as soon as possible prior to May 5, 2023 (within 30 days of testing) to show that the NFE is being operated in a satisfactory manner.

JVIS Crystal acknowledges that a formal test plan was not submitted at least 60 days prior to testing, however JVIS Crystal received verbal approval from EGLE AQD Matt Deskins, via conference call on March 15, 2023, to use a smoke vial taped to a pole to visually verify air flow is directed into the NFE unit (e.g., the pressure inside NFE is lower than pressure outside NFE such that air flows into the NFE through all natural draft openings).

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

Response: Per discussion with EGLE AQD, Matt Deskins, on March 15, 2023, it is approved for JVIS Crystal to collect samples of the two most widely used coatings and analyze those samples for VOC content using Reference Test Method 24. Sample results may be compared to the corresponding manufacturer's formulation data for verification that the VOC content reported by the manufacturer is accurate. If the Method 24 results and the manufacturer's formulation data are similar, then the facility may submit a request to the AQD District Supervisor to use manufacturer's formulation data for all coatings at the facility.

Samples of the two most widely used coatings, *Peter Lacke - Dark Ano Gray* (Dark Ano Gray); and *US Paint - MH62-1071TA1 Sunshine Super* (Sunshine Super), were collected on March 20, 2023, and sent to an environmental, chemical & materials testing laboratory for USEPA Method 24 VOC content analysis. The Method 24 VOC content results for each coating were compared to the manufacturer formulation data for each coating, as shown on the table below.

	Dark Ano Gray	Sunshine Super
	(lbs/gal)	(lbs/gal)
Manufacturer Listed VOC Content	5.61	4.67
Reference Test Method 24	5.73	4.77
Total Difference	0.12	0.10
Relative Percent Difference	2.12%	2.12%

The Method 24 results are an average of 0.11 pounds per gallon (lbs/gal) greater than the manufacturers formulation data, which is considered very similar according to BB&E. Based on this opinion, JVIS Crystal will submit a request to the EGLE AQD District Supervisor for approval to use the manufacturers formulation data, for the remaining coatings, to calculate the facility's annual VOC emissions.

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.

Response: JVIS Crystal staff checked the facility's files but were unable to locate any documentation of testing that was completed from April 2019 to present. During COVID years, much like many other

companies/institutions/agencies, JVIS Crystal experienced periodic shut down and high personnel turnover/staffing issues that may have contributed to incomplete data. However, based on this inspection finding, and as the facility is beginning to recover and maintain some staffing consistency, semi-annual air flow testing has been added to the facility's compliance calendar.

JVIS Crystal is ISO 14001 certified and has updated the facility's compliance calendar to include semi-annual NFE air flow testing to fulfill air flow permit requirements per PTI 202-95E; compliance items include: submission of a test plan no less than 60 days prior to testing, notification of testing at least 15 days prior to scheduled test, and submission of complete test results within 30 days of testing. The compliance calendar is monitored by plant management and audited annually as part of its ISO 14001 program. A snapshot of the compliance calendar is included as an attachment to this letter.

Except for the outstanding response to Comment 2, which will be addressed as described above, JVIS Crystal requests that the remaining alleged violations are resolved based on the information provided herein.

In accordance with the Violation Notice, a hard copy will be mailed to:

EGLE, AQD
Kalamazoo District
7953 Adobe Road
Kalamazoo, Michigan 49009

Jenine Camilleri
Enforcement Unit Supervisor
EGLE, AQD
P.O. Box 30260
Lansing, Michigan 48909-7760

Should you have any questions or concerns regarding this letter, please do not hesitate to contact me at (269) 967-0127.

Sincerely,



Kira Fillar
Project Manager
BB&E, Inc.



Attachments: as stated

cc:

Jenine Camilleri, EGLE
Tim Paton, JVIS
Tim Lane, JVIS

Attachment – Photographic Log

JVIS Violation Notice Response – Water Curtain Photographic Log


<p>Photo 1 03/21/2023</p> <p>Area: EUPLASTICPARTS</p> <p>Description: Operational water curtain</p>	 A photograph showing a water curtain system in an industrial setting. The water curtain is composed of several vertical panels of water, each supported by a metal frame. The water is dark and appears to be dripping. A yellow object is visible in the upper right corner of the frame.
<p>Photo 2 03/21/2022</p> <p>Area: EUPLASTICPARTS</p> <p>Description: Operational water curtain</p>	 A close-up photograph of a water curtain system. The water curtain is composed of several vertical panels of water, each supported by a metal frame. The water is dark and appears to be dripping. A white object is visible in the lower left corner of the frame.

JVIS Violation Notice Response – Water Curtain Photographic Log

<p>Photo 3 03/21/2022</p>	
<p>Area: EUPLASTICPARTS</p>	
<p>Description: Operational water curtain</p>	

Attachment – Compliance Calendar Snapshot

Corrective Action - Compliance Calendar – Addition to Benton Harbor Crystal Air permit regulatory obligations

		JVIS CRYSTAL COMPLIANCE CALENDAR													2023	
ITEM	File Location Reference	Share drive hyperlink evidence	Item completed (Enter value into column)	J	F	M	A	M	J	J	A	S	O	N	D	RESPONSIBLE DEPARTMENT/PERSON
				Inspections												
Air Permitting - Air flow direction sampling / testing (Semi-annual requirement. No less than 60 days prior to testing)	\\mustang2.na.enterpri						X						X			Herman Berry / Mgmt. Representative
Air Permitting - Testing notice (at least 15 days prior to scheduled test)	\\mustang2.na.enterpri				X							X				Herman Berry / Mgmt. Representative
Air Permitting - Testing completion (Submission of complete test results within 30 days of testing)	\\mustang2.na.enterpri							X						X		Herman Berry / Mgmt. Representative