



GRETCHEN WHITMER
GOVERNOR

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



LIESL EICHLER CLARK
DIRECTOR

September 24, 2019

CERTIFIED MAIL – 7017 3380 0000 4105 8445
RETURN RECEIPT

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

SRN: B6027, Lenawee County

Dear Mr. Ellerbrock:

VIOLATION NOTICE

On September 15, 2019, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), received the semi-annual report certification from Inteva Products, LLC - Adrian Operations (Inteva) located at 1450 E. Beecher St, Adrian, Michigan. The AQD's review of this certification has identified non-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 Renewable Operating Permit (ROP) number MI-ROP-B6027-2018.

During the AQD's review of the reports, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
EU-Paint 3	MI-ROP-B6027-2018 EU-Paint 3 Condition VI.2	Oven temperature recordkeeping requirements not met.

In the semi-annual certification, Inteva indicated that EU-Paint 3 oven temperature reading data shows events where the data logger was not functioning, resulting in 64 days where records for the bake oven temperature for EU-Paint 3 were not maintained. This is a violation of the monitoring and recordkeeping requirements in Special Condition EU-Paint 3 VI.2 of ROP number MI-ROP-B6027-2018. MI-ROP-B6027-2018 requires records be maintained and available for review upon request by AQD staff.

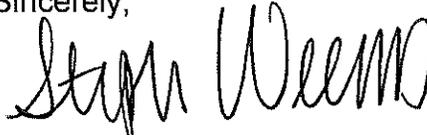
Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by October 15, 2019. The written response should include: the dates the violation occurred; an explanation of the causes and duration of the violation; whether the violation is ongoing; 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 E. Louis Glick Hwy, Jackson, Michigan 49201 and submit a copy to Ms. 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. 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,



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

cc: Mr. Duke Couch, Inteva Products, LLC
Mr. Perry Mulhollen, Inteva Products, LLC
Ms. Mary Ann Dolehanty, EGLE
Dr. Eduardo Olaguer, EGLE
Ms. Jenine Camilleri, EGLE
Mr. Christopher Ethridge, EGLE
Mr. Scott Miller, EGLE