



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
KALAMAZOO DISTRICT OFFICE



DAN WYANT
DIRECTOR

September 10, 2015

Mr. Jason Hoose
JVIS Manufacturing, LLC
1285 North Crystal Avenue
Benton Harbor, Michigan 49022

SRN: N3747, Berrien County

Dear Mr. Hoose:

VIOLATION NOTICE

On September 1, 2015, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of JVIS Manufacturing, LLC (Facility), located at 1285 North Crystal Avenue, Benton Harbor, Michigan. The purpose of this inspection was to determine the Facility's 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 administrative rules; and the conditions of Permit to Install (PTI) No. 202-95D and Consent Order No. 34-2013.

During the inspection, staff of the AQD observed the following:

Process Description	Rule/Permit Condition Violated	Comments
EUPLASTICPARTS	Special Condition III.4 under the Process/Operational Restrictions of PTI No. 202-95D, and Condition 9.A.3 of Consent Order No. 34-2013.	See comment 1 below
EUPLASTICPARTS	Special Condition V.3 under the Testing/Sampling Section of PTI No. 202-95D, and Condition 9.A.3 of Consent Order No. 34-2013.	See comment 2 below
Paint Spray Booth	Rule 336.1201 of Part 55 of Act 451.	See comment 3 below

Comment 1: The Facility did not submit a Malfunction Abatement Plan to the AQD for review and approval within 180 days of permit issuance.

Comment 2: After the initial performance test of the Regenerative Thermal Oxidizer, the Facility has not been conducting semi-annual tests for air flow into the Non-Fugitive Enclosure.

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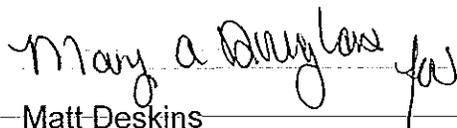
Comment 3: The Facility installed and was operating a paint booth under Rule 336.1287(c) (PTI exemption). However, the Facility has not been maintaining monthly coating usage records from that spray booth to show compliance with the exemption.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by October 6, 2015. The written response should include: the dates the violations occurred; an explanation of the causes and duration of the violations; whether the violations are ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violations and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

If the Facility 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 violations cited above and for the cooperation that was extended to me during my inspection of the Facility. If you have any questions regarding the violations or the actions necessary to bring this Facility into compliance, please contact me at the telephone number listed below.

Sincerely,



Matt Deskins
Environmental Quality Analyst
Air Quality Division
269-567-3542

MD:CF

Enclosure

cc: Ms. Lynn Fiedler, DEQ
Ms. Mary Ann Dolehanty, DEQ
Ms. Heidi Hollenbach, DEQ
Mr. Thomas Hess, DEQ
Ms. Mary Douglas, DEQ