

**DEPARTMENT OF ENVIRONMENTAL QUALITY  
AIR QUALITY DIVISION  
ACTIVITY REPORT: On-site Inspection**

P042971136

<b>FACILITY:</b> Magna DexSys (Delta Exterior Systems)		<b>SRN / ID:</b> P0429
<b>LOCATION:</b> 5589 W. MOUNT HOPE HIGHWAY, LANSING		<b>DISTRICT:</b> Lansing
<b>CITY:</b> LANSING		<b>COUNTY:</b> EATON
<b>CONTACT:</b> Tim Gibbons , Environmental Specialist		<b>ACTIVITY DATE:</b> 02/28/2024
<b>STAFF:</b> Matthew Karl	<b>COMPLIANCE STATUS:</b> Compliance	<b>SOURCE CLASS:</b> MAJOR
<b>SUBJECT:</b> Unannounced, on-site inspection was to determine compliance with permit MI-ROP-P0429-2023 as part of a full compliance evaluation (FCE).		
<b>RESOLVED COMPLAINTS:</b>		

**Staff:**

**Tim Gibbons, Environmental Specialist, DexSys (Delta Exterior Systems) 517-243-4892  
Timothy.Gibbons@magna.com**

**Purpose:**

The purpose of this unannounced, on-site inspection was to determine compliance with permit MI-ROP-P0429-2023 as part of a full compliance evaluation (FCE).

**Background:**

DexSys (Delta Exterior Systems) is owned and operated by Magna International, Inc (Magna). Magna DexSys is in a predominantly industrial area in Lansing. The closest industrial buildings are located within a quarter mile of the facility to the west, south and east. The Lansing Community College West Campus and an insurance agency are located to the north. There are also residential neighborhoods to the northwest of the facility. The I-496 corridor is approximately one mile north of the facility.

Magna DexSys is predominantly a General Motors (GM) automotive parts supplier specializing in the production of plastic automotive components. The automotive components consist of front- and rear-end bumper fascia which are created using mold injection presses and a paint coating line equipped with robotic spray applicators.

The plastic automotive components are fabricated via five (6) injection mold presses, which use mold release agents and thermoplastic olefin (TPO) resin pellets to produce front and rear bumpers. EUMOLD#1 through EUMOLD#4 are 4,000-ton injection molding presses and EUMOLD#5 is a 2,200-ton injection molding press. The conditions for the injection molds are contained in flexible group FGMOLDING. There is also one (1) exempt injection mold press (EUMOLD#6) which operates under exemption R 336.1286(2)(b).

The surface coating operation (EUPLASTICCOATING) of front- and rear-end bumpers consists of an uncontrolled paint kitchen; a 5-stage non-solvent parts washer with a natural gas-fired hot water heater; three (3) water wash spray booths for the application of adhesion promoters (AdPro), basecoats, and clearcoats and three (3) natural gas-fired drying ovens. The spray coating operation occurs in a non-fugitive enclosure that has been rated as a permanent total enclosure (PTE). The emissions are controlled by a regenerative thermal oxidizer (RTO). The PTE is designed to achieve a 100% capture efficiency of the coatings' hazardous air pollutants (HAPs) and volatile

organic compounds (VOC). The emissions are routed to the RTO which is required to achieve a minimum destruction efficiency of 95%. Most of the solvent used in the process is recovered into the solvent recovery tanks, which are transferred to a larger holding tank, which is periodically emptied and recycled by a third party. The volatile fraction of the solvents that are aerosolized are controlled by the RTO control.

EUFINESSE is a defect repair station in which hand-held sanders and buffing pads are used. The repaired part is cleaned with a cloth containing isopropyl alcohol (IPA) and water. Conditions for EUPLASTICCOATING and EUFINESSE are contained in the flexible group FGMACT-PPPP, which covers the federal requirements for 40 CFR Part 63, Subpart PPPP – Surface Coating of Plastic Parts and Products.

There are three (3) diesel-fired emergency generators (FGDIESELENGS) located throughout the facility which are used to provide backup power during power outages. Some of the generators are contractually obligated to be tested for GM’s purposes. EUFIREPUMPENG is a 190 kW (241 hp) DEUTZ AG diesel fuel-fired emergency engine model year 2009. EUDIESELENG#1 is a 130 kW (198 hp) Generac industrial diesel emergency engine model SD130 model year September 9, 2015. EUDIESELENG#2 is a 563 kW (744 hp) Tacoma Cummins industrial diesel fuel-fired emergency engine model QSX15, model year 2007 or later.

EUHEATERS is made up of air make-up units and miscellaneous heaters all individually less than 9.9 MMBtu/hr of heat input. EUBOILER is a 12.5 MMBtu/hr natural gas-fired boiler. Conditions for the heaters are contained in the flexible group FGNATURALGAS. The boiler EUBOILER is used for heating washer water and for temperature and humidity control for the paint system. It has a 1319-gallon capacity. Conditions for the boiler are contained in FGMACT-DDDDD, which contains the federal requirements for 40 CFR Part 63, Subpart DDDDD – Industrial, Commercial and Institutional Boilers and Process Heaters for Major Sources.

**Regulatory Determination:**

The source is considered a major source of hazardous air pollutants (HAPs) because the potential to emit of any single HAP exceeds 10 tons per year and aggregate HAPs exceed 25 tons per year. The source is considered a synthetic minor “opt out” with respect to volatile organic compounds (VOC) because VOCs are limited to less than 100 tons per year.

Emission Units/ Flexible Groups	Control Equipment	State Rules and/or Federal Rules	Compliance (Y/N)
EUPLASTICCOATING	PTE, RTO, water wash particulate control	Rules 205, 225(2), 702 (a); 40 CFR Part 64, 40 CFR Part 63, Subpart PPPP	Y
EUFINESSE	NA	Rules 205, 225, 702(a); 40 CFR Part 63, Subpart PPPP	Y



FGMOLDING	NA	Rules 225, 702(a)	Y
EUMOLD#6	NA	Rules 212(3)(g); 286(2)(b)	Y
FGNATURALGAS	NA	Rules 205(1)(a), 225	Y
FGMACT-PPPP	RTO	40 CFR Part 63, Subpart PPPP	Y
EUBOILER/ FGMACT-DDDDD	NA	40 CFR Part 63, Subpart DDDDD	Y
EUFIREPUMPENG, EUDIESELENG#1, and EUDIESELENG#2/ FGDIESELENGS	NA	40 CFR Part 60, Subpart IIII	Y
EUPartsCleaner1, EUPartsCleaner2/ FGCOLDCLEANERS	NA	Rules 278, 278(a), 281(2)(h), 285(2)(r)(iv)	Y
EUPaintbooth/ FGRULE287(2)(c)	Fabric filter particulate control	Rule 287(2)(c)	Y
EURockerPanelAssembly/ FGRULE290	NA	Rule 290	Y
EUSolventTotes	NA	Rule 212(4)(d), 284(2)(i)	Y
EUStorageContainer	NA	Rule 212(4)(d), 284(2)(b)	Y
EUOven-Quality Control	NA	Rule 212(4)(c), 282(2)(b)(i)	Y
EURofin DCX50 CO2 Laser	Particulate Control	Rule 212(4)(e), 285(2)(I)(vi)(C)	Y

EUADHESIVECOATING	NA	Rule 290	Y
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#### On-Site Inspection Wednesday February 28, 2024:

I (Matt Karl) arrived on site and signed in at the front door. Tim Gibbons came out and buzzed me through the security turnstile doors. We sat down briefly in a conference room in the front office, and we had the pre-inspection meeting where I discussed what I wanted to see during the inspection and the records I would need to review. The personal protective equipment (PPE) required includes safety glasses and steel toed boots.

Tim Gibbons escorted me through the facility. First, he showed me the paint booth (EUPAINTBOOTH, FGRULE287(2)(c)). The paint booth is used to paint parts with aerosol spray paint cans. Tim informed me that the number of cans used is tracked and then the volumes are converted to gallons to show compliance with the permitted material limit. He also informed me that fabric filters are changed out monthly.

Next, we observed the molding operations. The molding operations consist of five (5) permitted injection molding presses and one (1) exempt injection molding press. The molding operations use thermoplastic olefin (TPO) resin pellets to produce automotive bumpers, as well as spray on mold release and degreasers to keep the bumpers from sticking to the molds. The permitted presses are four (4) 4000-ton presses (EUMOLD#1 through EUMOLD#4), one (1) 2200-ton press (EUMOLD#5). There is also one (1) exempt injection molding press (EUMOLD#6) which was installed as a separate project from the other mold lines and operates under exemption Rule 336.1286(2) for plastic injection, compression and transfer molding equipment and associated plastic resin handling, storage, and drying equipment. A potential to emit (PTE) demonstration was submitted with the previous ROP renewal application that showed the potential emissions from EUMOLD#6 were 0.04 tons per year of HAP (Hexane) and 1.21 tons per year of VOC.

We then proceeded to the boiler (EUBOILER) which is a Rite Water Boiler model 1250 WG rated at 12.5 MMBTU/hr natural gas-fired boiler with a water capacity of 1319 gallons with serial number 31583. The boiler is used to heat water as part of the five-stage parts washer portion of the surface coating operation (EUPLASTICCOATING). The boiler was last tuned in May of 2023 and was last inspected by the Department of Labor on January 6, 2023. The last boiler MACT tune-up was performed on May 25, 2023 (see Boiler MACT Tune-up checklist 5.25.23.pdf below). During this tune-up, the boiler's burner was visually inspected, and the flame pattern was found to be optimal with the manufacturer's specifications. The air-to-fuel ratio was also found to be optimal. The initial and final CO emissions were found to be 0 ppm at the typical operating mode of low/mid load and 1 ppm in high load.

Tim led me up a set of stairs to the spray booth portion of the coating operation (EUPLASTICCOATING). I did not enter the booths, which required additional PPE of paint suits or Tyvek suits for quality control purposes. I later requested that Tim provide me with the number of applicators and their type in each of the EUPLASTICCOATING booths. Tim informed me that there were three (3) electrostatic guns in the Adhesion promoter booth; nine (9) electrostatic bell disk applicators, three (3) each in three (3) basecoat booths; six (6) electrostatic bell disk applicators, three (3) each in two (2) clearcoat booths. I was able to observe the permanent total enclosure (PTE) pressure drop gauges from the door. Tim informed me that they keep electronic



records of the pressure drop across the spray booths. I later requested one week of booth differential pressure data (see Booth Differential Pressure Data 3.11.24-3.15.24.pdf below). I also later requested how the VOC contents of each coating and solvent are determined. Tim clarified that the "VOC contents of each coating and solvent are determined based upon the manufacturer's formulation data." We then proceeded beneath the painting booths where I observed the four (4) solvent recovery tanks. Solvent is recovered from the spray booths through pipes into the 4 solvent recovery tanks. The solvent is then transferred from the smaller tanks into a large holding tank adjacent to the paint storage and paint kitchen. The larger holding tank is periodically emptied out and the solvent is taken offsite for recycling. The purge solvent used is "Purge 31950" which is a xylene containing solvent. Most of the solvent used in the process is recovered into the solvent recovery tanks. The volatile fraction of the solvents that are aerosolized are controlled by the RTO control.

I observed the paint storage area and the paint kitchen. I noted sealed 55-gallon drums stored in the paint storage area. Drums were attached to pneumatic kettles in the mix room portion of the paint kitchen. I observed the rotary chamber regenerative thermal oxidizer (RTO) control for EUPLASTICCOATING. I noted no visible emissions/opacity from the stack and noted no odors near the RTO. I checked the control panel for the RTO and noted the combustion chamber temperature was 1518-1519 degrees Fahrenheit, which was above the permit required minimum temperature of 1500 degrees Fahrenheit. I later requested one week of RTO combustion chamber temperature data (see RTO Temperature Data 3.11.24-3.15.24.pdf below). I also later requested any records of thermocouple calibrations or maintenance activities conducted on the RTO in 2023. Tim sent me a Paint Maint Work Order (see 2023 Annual RTO PM.pdf below) that noted that on January 29, 2023, the maintenance technician changed the thermocouples on the combustion chamber, cleaned the gas filter/screen which involved watching, listening and smelling for leaks in the gas train; greased/lubricated the motor and fan bearings.

Next, we proceeded to the maintenance area that contained the two parts cleaners identified as EUPartsCleaner1 and EUPartsCleaner2 whose conditions are in FGCOLDCLEANERS. The two parts cleaners are located next to each other. One is a Justrite Liquid Safety Rise Tank with an air:vapor interface of 4.5 square feet and the other is a Graymill Parts Washer with an air vapor interface of 5.8 square feet.

Tim escorted me to the fire pump engine (EUFIREPUMPENG) and the two-emergency engine/generators (EUDIESLENG#1 and EUDIESELENG#2) whose conditions are in FGDIESELENGS. EUDIESELENG#1 provides backup power for the molding area, EUDIESELENG#2 provides backup power for the assembly area, and the EUFIREPUMPENG provides backup power for the fire suppression system. Tim informed me that the engines rarely run except for maintenance testing.

We proceeded to the area where the rocker panel assembly process was located. The rocker panel assembly process is identified as EURockerPanelAssembly whose conditions are in FGRULE290. The process uses a 99% isopropyl alcohol (IPA) solution to apply peel and stick adhesive to parts. Tim informed me that they track the amounts of IPA used in the process. A sealed 55-gallon drum was located next to the work area for waste solvent.

Finally, I checked on the new process identified as EUADHESIVECOATING that the source submitted a Rule 278a exemption demonstration for on January 10, 2024, showing that the process is exempt under Rule 290. EUADHESIVECOATING involves an adhesive coating process

using handheld applicators to adhere a TPO rocker panel to an aluminum rocker panel cover. The process involves a 2-part adhesive, adhesion promoter, TPO primer, and a glass primer. Coatings will be applied by hand with handheld applicators. All emissions are fugitive, with no control devices. EUADHESIVE is still in pre-production, with anticipated production operations scheduled to start in June 2024. Tim informed me the process will likely be very low volume and will probably be a short-term project.

Tim and I returned to the front administrative office and had the post-inspection meeting. I laid out what records I would request via email. Tim walked me to the door; I signed out and departed.

**Semiannual / Annual and MACT (Part 63) Compliance Reports Review:**

As part of my full compliance evaluation (FCE), I reviewed the compliance reports received from the source. The source submits ROP semi-annual and annual compliance reports pursuant to Rule 213(4)(c). In 2023, the source reported compliance with ALL terms and conditions contained in the ROP. They reported no deviations from the monitoring and associated recordkeeping requirements.

The source also submits semi-annual compliance reports pursuant to 40 CFR Part 63, Subpart PPPP – National Emission Standards for Hazardous Air Pollutants (NESHAP) for Surface Coating of Plastic Parts and Products. The source complies through the option for meeting the emission limits of 0.16 lb Organic HAP per lb of coating solids for general use coating and 0.22 lb Organic HAP per lb of coating solids for Thermoplastic Olefin (TPO) coating (FGMACT-PPPP SC I.1 and I.2) by using 40 CFR 63.4491(c) Emission rate with add-on controls option. The RTO is the control for this process. The source submits the following tables which contain the calculation results for each rolling 12-month organic HAP emission rate during the 6-month reporting period. I have reproduced the tables for 2023 below:

Date	HAP Content Monthly (lb/lb)	HAP Content 12-Month Rolling (lb/lb)
Jan-23	0.01	0.01
Feb-23	0.01	0.01
Mar-23	0.01	0.01
Apr-23	0.00	0.01
May-23	0.01	0.01
Jun-23	0.01	0.01
Jul-23	0.004	0.005



<b>Aug-23</b>	<b>0.005</b>	<b>0.005</b>
<b>Sept-23</b>	<b>0.005</b>	<b>0.005</b>
<b>Oct-23</b>	<b>0.007</b>	<b>0.005</b>
<b>Nov-23</b>	<b>0.006</b>	<b>0.005</b>
<b>Dec-23</b>	<b>0.004</b>	<b>0.005</b>

**Last Stack Test 6/30/2020:**

As part of my full compliance evaluation (FCE), I reviewed the last stack test conducted on the RTO control for EUPLASTICCOATING SC V.2 and V.3. The testing was conducted by Montrose Air Quality Services, LLC using USEPA Methods 1, 2, 3, 4, and 25 for VOC destruction efficiency (DE) and USEPA Method 204 for the permanent total enclosure (PTE). I have summarized the results of testing in the table below:

<b>RTO Inlet</b>				
<b>Parameter</b>	<b>Run 1</b>	<b>Run 2</b>	<b>Run 3</b>	<b>Average</b>
<b>TGNMO as Carbon</b>	<b>8:51-9:51</b>	<b>10:55-11:55</b>	<b>12:36-13:56</b>	<b>--</b>
<b>ppmvd</b>	<b>2270</b>	<b>2423</b>	<b>2274</b>	<b>2322</b>
<b>lb/hr</b>	<b>105.2</b>	<b>110.4</b>	<b>102.7</b>	<b>106.1</b>
<b>RTO Outlet</b>				
<b>TGNMO as Carbon</b>	<b>8:50-9:50</b>	<b>10:56-11:56</b>	<b>12:37-13:57</b>	<b>--</b>
<b>ppmvd</b>	<b>&lt;50</b>	<b>&lt;50</b>	<b>&lt;50</b>	<b>&lt;50</b>
<b>lb/hr</b>	<b>&lt;2.32</b>	<b>&lt;2.29</b>	<b>&lt;2.24</b>	<b>2.28</b>
<b>TGNMO DE %</b>	<b>&gt;97.8</b>	<b>&gt;97.8</b>	<b>&gt;97.8</b>	<b>&gt;97.8</b>

PTE		
Parameter/Units	Results	Allowable
NDO 1 East Elevation		
Differential Pressure, in-H2O	0.012	≥0.007
NDO2 West Elevation		
Differential Pressure, in H2O	0.011	≥0.007
PTE %	100	100

EUPLASTICCOATING SC V.2 and V.5 requires the permittee to complete the test once every five (5) years from the date of the last test. Therefore, the next test is required by June 30, 2025.

**Records Review:**

I received the following records from Tim Gibbons via email on March 4, 2024:

“Air emissions data Jan 23-Jan 24” contains emissions data for EUPLASTICCOATING, EUFINESSE and FGMOLDING as well as the natural gas usage in FGNATURALGAS. For EUPLASTICCOATING it contains information for VOC, formaldehyde, naphthalene, cumene, ethylbenzene, and xylene. For EUPLASTICCOATING it contains emissions data in units of tons per month and tons (or pounds) per year (for each month as a 12-month rolling average) depending on the pollutant. For EUFINESSE and FGMOLDING it contains information for VOC in units of tons per month and tons per year (for each month as a 12-month rolling average). For FGNATURALGAS it contains natural gas usage in units of mmcf per month and mmcf/year (for each month as a 12-month rolling average). I have summarized the information in the table below.

Emission Units/ Flexible Groups	Parameter	Limit	Actual Reported	% of Limit	Source
EUPLASTICCOATING	VOC	59.1 tpy	6.1 tpy (Jan-24)	10.3%	Air Emissions data Jan 23-Jan 24
EUPLASTICCOATING	Cumene	744.6 lb/yr	125.2 lb/yr (Jan-24)	16.8%	Air Emissions data Jan 23-Jan 24
EUPLASTICCOATING	Ethyl benzene	10,792.3 lb/yr		3.2%	



			342.1 lb/yr (Nov-23)		Air Emissions data Jan 23-Jan 24
EUPLASTICCOATING	Naphthalene	1,033.7 lb/yr	22.8 lb/yr (Nov-23)	2.2%	Air Emissions data Jan 23-Jan 24
EUPLASTICCOATING	Xylenes	108.0 lb/day	7.8 lb/day (6/22/23)	7.2%	Daily Xylene – June 2023
EUPLASTICCOATING	Formaldehyde	876.0 lb/yr	35.1 lb/yr (Jan-24)	4.0%	Air Emissions data Jan 23-Jan 24
EUFINESSE	VOC	2.0 tpy	0.6 tpy (Jul-23)	30.0%	Air Emissions data Jan 23-Jan 24
FGMOLDING	VOC	0.6 tpy	0.2 tpy (Jan-24)	33.3%	Air Emissions data Jan 23-Jan 24
FGNATURALGAS	Nat. Gas Usage	573 MMcf/yr	62.2 mmcf/yr (Jan-24)	10.9%	Air Emissions data Jan 23-Jan 24
FGMACT-PPPP	Organic HAP- General Use Coating	0.16 lb/lb coating	0.01 (lb/lb) (Dec-23)	6.3%	MACT (Part 63) – Subpart PPPP Annual Compliance Report
FGMACT-PPPP	Organic HAP- TPO Coating	0.22 lb/lb coating	0.01 (lb/lb) (Dec-23)	4.5%	MACT (Part 63) – Subpart PPPP Annual Compliance Report

“Daily Xylene – June 2023” contains information on the daily xylene emission totals. The spreadsheet contains the solvent-borne adpro & clearcoat name, the thinners used, and the cleanup solvents used, as well as the manufacturer’s code. The table then lists the amount of xylenes resulting from the usage of each of those materials each day. Currently, the only material used that is a source of xylenes emissions is the cleanup solvent Purge 31950.

“Diesel Generator 12 month rolling – Jan 23 – Jan 24” and “FGDIESELENGS monthly Jan 23-Jan 24” both contain similar information for EUDIESELENG#1, EUDIESELENG#2 and EUFIREPUMPENG.

They contain information on the month, the meter reading, the hours spent on maintenance/testing, emergency hours, non-emergency hours, total monthly hours, and the rolling 12-month total hours for each engine. All three (3) engines were below the 500 hours per year on a 12-month rolling time period basis limit. Each engine was operated for a few (1.1-4.9) hours per month for maintenance testing. EUFIREPUMPENG was only operated for maintenance testing in 2023. EUDIESELENG#1 was run for 24 hours during August 2023 for emergency purposes. EUDIESELENG#2 was run for emergency purposes in April 2023 for 5.5 hours, in July for 20 hours, in August for 30 hours, and in January for 23 hours. EUDIESELENG#2 was also operated for 16 hours for non-emergency purposes in August 2023.

On March 28, 2024, I received the following records from Tim Gibbons via email:

“Booth Differential Pressure Data 3.11.24-3.15.24.pdf” contains information for the permanent total enclosure (PTE) associated with emission unit EUPLASTICCOATING from March 11<sup>th</sup> to March 15<sup>th</sup>, 2024. It contains two tables, one for the CC2 Oven and one for the Tack Off which are the two natural draft openings (NDOs) of the PTE. Each table has four columns: a date/time stamp, the 15-minute differential pressure, a date/time stamp, and the 1-hour average differential pressure.

EUPLASTICCOATING SC VI.8, VI.10 and VI.11 require that the permittee monitor the pressure drop at 15-minute intervals across the enclosure and average those readings over a 1-hour averaging period. The differential pressure is required to be less than 0.007-inch H<sub>2</sub>O.

For the CC2 Oven 15-minute periods ranged from 0.032-inch H<sub>2</sub>O to 0.048-inch H<sub>2</sub>O. The 1-hour averaging periods ranged from 0.036-inch H<sub>2</sub>O to 0.044-inch H<sub>2</sub>O. For the Tack Off 15-minute periods ranged from 0.009-inch H<sub>2</sub>O to 0.025-inch H<sub>2</sub>O. The 1-hour averaging periods ranged from 0.013-inch H<sub>2</sub>O to 0.024-inch H<sub>2</sub>O. The readings are all in negative pressure indicating the flow of air is into the NDOs. All the pressure drops were less than the 0.007-inch H<sub>2</sub>O requirement.

“RTO Temperature Data 3.11.24-3.15.24.pdf” contains information for the RTO control device combustion chamber temperature data from March 11<sup>th</sup> to March 15<sup>th</sup>, 2024. The RTO is the control device for emission unit EUPLASTICCOATING. It contains one table with three columns: one for the date/time stamp, one for the RTO temperature collected at 15-minute intervals, and the RTO temperature 1-hour average.

EUPLASTICCOATING SC VI.6 requires the permittee to monitor the temperature in the combustion chamber of the RTO at 15-minute intervals for an hourly average. The RTO combustion chamber is required to be maintained at a minimum temperature of 1500°F.

The 15-minute temperatures ranged from 1511.8°F to 1530.4°F and the hourly average temperatures ranged from 1517°F to 1523.9°F. The RTO combustion chamber temperature was maintained well above the minimum temperature of 1500°F.

On Friday, March 29, 2024, I requested the following records via email:

- The Boiler MACT tune-up record for EUBOILER for 2023 (FGMACT-DDDDD SC III.1)
- The maintenance activity records for the emergency engines in FGDIESELENGS for 2023 (FGDIESELENGS SC VI.3)



- Any records of thermocouple calibrations or maintenance activities conducted on the RTO in 2023 (EUPLASTICCOATING SC VI.15)
- How are the VOC contents of each coating and solvent determined? (EUPLASTICCOATING SC VI.2)
- The number of applicators and their type in each of the EUPLASTICCOATING booths (EUPLASTICCOATING SC IV.2 and IV.3)

Facility contact Tim Gibbson responded to my records request on Thursday, April 4, 2024:

**“Boiler MACT Tune-up checklist 5.25.23.pdf”** contains the Boiler MACT Tune Up Checklist. The checklist notes that the burner was inspected visually. None of the components were replaced. The flame pattern was inspected and found to be optimal. The air-to-fuel ratio control was inspected and found to be optimal. The CO in ppm was found to be 0 initial at low/mid load and 1 ppm at high load, and the oxygen in volume percent was found to be 7.1% at low load, 6.9% at mid load, and 4.9% at high load. After adjustments were made the levels were found to be the same.

For EUDIESELENG#1 the following records were provided: **“0707823-DEXSYS-LB-052523.pdf”** which contains the Wolverine Power Systems Load Bank Data Sheet from May 25, 2023. The data sheet contains information on the time of the readings, the load bank (LB) load in kilowatts (kW), the amperage (AMP) (Load) Readings, the Voltage Readings, and unit information including: Genset Frequency in hertz (Hz), battery charger in volts (V), oil pressure in pounds per square inch (PSI), gas pressure in inches of water column (“WC), engine temperature in degrees Fahrenheit (° F) and the unit hours. The engine was tested at 45-, 66- and 129-kW load. This was a 2-hour load bank (LB) test.

**“0707823-DEXSYS-PM-052523.pdf”** contains the Wolverine Power Systems Maintenance Inspection Report for EUDIESELENG#1 that was conducted on May 25, 2023. The report contains equipment information, an inspection checklist of items inspected during the minor preventative maintenance inspection. There were no issues identified and the air filter, battery and coolant were all found to be in good condition.

**“0719239-DEXSYS 130KW GENERAC-PM-011524-JSA-000.pdf”** contains the Wolverine Power Systems Maintenance Inspection Report for EUDIESELENG#1 that was conducted on January 15, 2024. The report contains equipment information, an inspection checklist of items inspected during the major maintenance inspection. There were no issues identified. The air filter and coolant were found to be in good condition, and the battery was found to be in moderate condition.

**“0707822-DEXSYS-LB-052523.pdf”** contains the Wolverine Power Systems Load Bank Data Sheet for EUDIESELENG#2 that was conducted on May 25, 2023. The data sheet contains information on the time of readings, the LB Load (kW), the Amp (Load) Readings, the Voltage Readings, Unit Information such as Genset Frequency (Hz), Battery Charger (V), Oil Pressure (PSI), Gas Pressure (“WC), Engine Temperature (°F) and Unit Hours. The engine was tested at 153-, 254- and 491-kW load. This was a 2-hour LB test.

**“0707822-DEXSYS-PM-052523.pdf”** contains the Wolverine Power Systems Maintenance Inspection Report for EUDIESELENG#2 that was conducted on May 25, 2023. The minor inspection

report included equipment information and an inspection checklist of items inspected. The summary indicated that the engine needed a new battery during the next major preventative maintenance due to the age of the battery. The air filter and the coolant were in good condition.

"0719238-DEXSYS 500KW CUMMINS-PM011524-JSA-000.pdf" contains the Wolverine Power Systems Maintenance Inspection Report for EUDIESELENG#2 that was conducted on January 15, 2024. The major inspection report included equipment information and an inspection checklist of items inspected. The notes stated that the "temp[erature] outside was 7 degrees [Fahrenheit] so [the] oil was extremely thick and took about 5 times longer to fill oil. [The] unit still needs [an] air filter, batteries, and a coolant change."

"Dexsys-Annual Fire Pump Maintenance 2023.pdf" contains the Boynton Fire Safety Service. It contains the annual maintenance items checklist dated November 4, 2023. The comments noted "Pressure tested gauges to check pre and post backflow pressures. Both churn and 100% pressure stayed the same."

"2023 Annual RTO PM.pdf" contains the work order record for the RTO control preventative maintenance conducted on January 29, 2023. The thermocouples were changed on the combustion chamber. The clean gas filter/screen and the technician watched, listened, and smelled for leaks in the gas train. The technician greased/lubricated the moto bearings and fan bearings.

**How are the VOC contents of each coating and solvent determined? (EUPLASTICCOATING SC VI.2)**

- VOC contents of each coating and solvent are determined based upon the manufacturer's formulation data.

**The number of applicators and their type in each of the EUPLASTICCOATING booths (EUPLASTICCOATING SC IV.2 and IV.3)**

- 3x applicators in Adhesion Promoter booth
  - Electrostatic guns
- 3x applicators in each Basecoat booth (3 booths, 9 applicators total)
  - Electrostatic bell disk applicators
- 3x applicators in each Clearcoat booth (2 booths, 6 applicators total)
  - Electrostatic bell disk applicators

**Conclusions:**

**At the time of this inspection, Magna DexSys appeared to be in compliance with permit MI-ROP-P0429-2023.**

NAME Matthew P. Kord

DATE 4/9/24

SUPERVISOR RB