

P0594
MANILA

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

P059467964

FACILITY: MAGNA CLOSURES LIGHTING DIVISION		SRN / ID: P0594
LOCATION: 46600 PORT STREET, PLYMOUTH		DISTRICT: Detroit
CITY: PLYMOUTH		COUNTY: WAYNE
CONTACT: Garry Bucholz , Health/Safety/Environmental Manager		ACTIVITY DATE: 06/26/2023
STAFF: Stephen Weis	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: Compliance inspection of the Magna Closures Lighting Division facility in Plymouth Township. The Magna facility is scheduled for inspection in FY 2023.		
RESOLVED COMPLAINTS:		

Location:

Magna International, Inc.
Autosystems America, Inc. (Division of Magna Closures Lighting)
(SRN P0594)
46600 Port Street
Plymouth Township 48170

Date of Activity:

Monday, June 26, 2023

Personnel Present:

Steve Weis, EGLE-AQD Detroit Office
Garry Bucholz, Manager Global HSE, Magna Mechatronics, Mirrors and Lighting
Duane Shewmaker, Health, Safety and Environmental Coordinator, Magna Closures Lighting Division

Purpose of Activity

A self-initiated inspection of the Magna International, Inc. Magna Closures Lighting/Autosystems America facility (hereinafter "Magna") in Plymouth Township was conducted on Monday, June 26, 2023. The Magna facility was on my list of sources targeted for an inspection during FY 2023. The purpose of this inspection was to determine compliance of operations at the Magna facility with applicable rules, regulations and standards as promulgated by Public Act 451 of 1994 (NREPA, Part 55 Air Pollution Control), and with applicable Federal standards. The facility is also subject to the terms and conditions of EGLE-AQD Permit to Install (PTI) No. 42-15E.

Facility Site Description

The Magna facility is an automotive lighting manufacturer that operates in a 156,000 square foot building located on a 30-acre parcel on the north side of Port Street about 0.4 miles east of Beck Road in Plymouth Township. The building was formerly owned and operated by Johnson Controls. Magna purchased the building in 2014 and began operations at the site in 2015.

The Magna facility is located in the Plymouth Corporate Park, Metro West Technology Park, which consists of various commercial and light industrial properties stretching along Post Street east of Beck Road, and north of the M-14 freeway. The area bounded by M-14 to the south, 5 Mile Road to the north, Sheldon Road to the east and Ridge Road to the west is occupied by similar commercial/industrial parks. Some of the neighboring businesses to Magna include a McLane

Foodservice distribution facility to the west, and a Plymouth Township Division of Public Services office and supply facility to the south. The northern and eastern portions of Magna's parcel are undeveloped and wooded.

The closest residential areas to the Magna facility are located on the south side of M-14, with the closest residences located approximately 1/2 mile from the facility on the south side of M-14.

Facility Operations

The Magna facility is part of Magna International, Inc., which is based in Ontario, Canada. The Plymouth facility operates as part of Magna MML (Mechatronics Mirrors and Lighting), a division of Magna International which is headquartered in Newmarket, Ontario. According to the company website (www.magna.com), the MML group produces forward and rear lighting systems, exterior and interior vision systems, and complete mechatronic power systems across all access points of a vehicle. There are Magna MML facilities in various locations in North America and around the world, including Canada (Belleville, Ontario), Mexico (Matamoros), Italy, Poland, Brazil and China.

The Magna facility in Plymouth produces automotive headlamp and taillamp assemblies. The facility's primary customer is General Motors, with headlamp and taillamp parts being produced for two General Motors sport utility vehicles, the Traverse and the Acadia. The production operations at the facility consist of molding, coating, and assembly operations. The molding operation consist of 14 plastic injection molding presses that produce headlight and taillight lenses and housing frames for automotive lighting fixtures. The molded parts are conditioned in electrically heated annealing ovens. Mold release and mold cleaners are applied to the molds using aerosol cans, which are recycled on site.

The coating operation currently consists of three coating application lines - two anti-fog coating application lines, in which the inside/interior surface of the headlight and taillight lenses receive a coating that prevents condensation from forming, and a hardcoat application line, in which a protective coating is applied to the exterior surface of the headlight lens to provide protection from ultraviolet light degradation. Each of these coating lines has an electric cure oven in which the coated parts are cured. Magna requested and received a permit modification in 2016 to allow the facility to reclaim paint solids from the hardcoat application line. Coating overspray is captured by the facility - prior to the on-site paint solids reclamation, the collected paint solids were sent offsite for recovery and disposal. The facility now recycles the captured paint solids from the overspray by dissolving them in isopropyl alcohol (IPA) for reuse/reapplication. The paint solids recycling project has resulted in Magna using 70% reclaimed coating and 30% virgin coating in the hardcoat application line.

The housing frames that are produced in the molding process that are part of the headlight assembly are coated in a vacuum metalizing chamber in which, under temperature and pressure, an aluminum wire is volatilized, and deposits on the plastic frames. This process does not involve VOC containing materials, and it is electrically heated.

The assembly operation involves assembling the headlight and taillight fixtures; the headlight and taillight lenses are attached to their respective headlight and taillight housings. The fixtures are assembled with screws and a bonding adhesive.

From the perspective of air quality regulations, the following is a listing of the process equipment that is included in Magna's current AQD permit, PTI No. 42-15E:

- EUMOLDING – 14 plastic injection molding lines that are used to produce headlight and taillight lenses and automotive lighting fixture housing frames from various types of thermoplastic polymers.
- EUANTI-FOG-1 through EUANTI-FOG-3 – coating lines that apply a coating to the inside/interior surface headlight and taillight lenses. Each coating line consists of a spray booth with a single robotic HVLP applicator and an electric cure oven. Two of the anti-fog coating lines are in place and operating. The third was permitted via PTI No. 42-15E, and has not yet been installed. I was told during the site visit that the company anticipates new business that necessitated the permitting of the third coating line, and it should be installed in the short term.
- EUHARDCOAT – a coating line that applies a coating to the exterior surface of headlights lenses, and consists of a spray booth with a single robotic applicator and an electric infrared cure oven.
- EUFIREPUMP – a 142 kW diesel-fired emergency engine that was manufactured in 2014.

The facility operates the molding processes on two 12-hour shifts, 7 days per week. The coating and assembly processes operate three 8-hour shifts, 5 days per week.

Inspection Narrative

I arrived at the facility at 1:30pm. I entered the main lobby, where I was met by Duane Shewmaker. After signing in and receiving a visitor's pass, Duane and I proceeded to Garry's office.

We started the site visit by discussing the facility. I started by asking whether the third anti-fog coating line that was addressed in PTI No. 42-15E has been installed. Garry replied that the third line has not yet been installed. The company is anticipating new business that will necessitate the installation of the third anti-fog line. I reviewed some of the information about the facility and the company from my last visit to the facility to check if it is still valid. Garry confirmed that the Plymouth facility is part of Magna MML (Mechatronics Mirrors and Lighting), a division of Magna International. He told me that GM is still the primary customer for the facility, with the Plymouth facility producing headlamp and taillight parts for the Traverse and Acadia sport utility vehicles. We discussed the operating hours for the facility, and Garry told me that the coating and assembly portions of the facility operate three 8-hour shifts, Monday through Friday, and that the molding processes operate two 12-hour shifts, 7 days per week.

We then discussed the facility's compliance with their permit. I went through the permit conditions, and Garry and Duane provided information regarding how compliance is determined and demonstrated. For some of the permit conditions, I was shown records that the facility keeps to track compliance, and Duane made copies of several of them for me to take as part of my compliance review. Other records were emailed to be as part of the compliance demonstration.

After concluding our permit discussion and records review, we performed a walkthrough of the facility. We started in the injection molding area. Garry described how automotive lighting housings and lenses are molded by the injection molding machines.

We walked through the Anti-Fog coating line, and observed Anti Fog Line 2 in operation. We looked at the mix area, and watched the robotic application of an anti-condensation coating. We then walked by and observed the Hard Coat coating line. Garry pointed out a trough in back of the of the equipment through which coating is recycled as part of the permitted coating recycling operation. Garry discussed how sec-butyl was considered and evaluated as a solvent to be used in the solvent blend that is mixed with the

reclaimed coating solids. He told me that this was discussed with Permit staff during the most recent PTI review, that this material was approved for use, so IPA and sec-butyl are currently used in the coating solids reclaim and recycling process.

We walked through the facility's waste and recycle area in the east end of the facility. Waste materials are kept in labeled, sealed drums awaiting offsite disposal. US Industrial Technologies collects the oily waste water generated on site. Garry said that there are three primary waste streams – solids, waste anti-fog material (which is mainly expired coating material that has solidified), and used aerosol containers. I took a picture of the aerosol container collection and recycling area, a copy of which is included with this report. There is also a universal waste collection for items such as spent batteries and lamps. We then walked through the maintenance shop, and I took a picture of a Safety Kleen parts washer that is utilized in this area of the facility, a copy of which is included with this report. Garry confirmed that non-HAP material is used in the parts washer.

We observed the metalizer process. There are five metalizers, but due to moving away from frequent use of the metalizing process, only one is in use. The process involves a chamber with a thin aluminum wire that is under a specified temperature and pressure. This volatilizes the aluminum wire, which deposits onto a plastic lamp part via polarization. The metalizer units are heated electrically, and Garry provided that the small pipe that vents the metalizers is used to vent heat.

After walking through the facility, we returned to the Garry's office. After a brief conversation summarizing the site visit and the needed records, I left the facility at 3:40pm.

Permits/Regulations/Orders/Other

Permits

The Magna facility currently has an active EGLE-AQD Permit to Install (PTI), PTI No. 42-15E, that was approved on October 24, 2022. This permit addressed the installation and operation of a third anti-fog coating line.

The following provides a description of the Magna facility's compliance with the Special Conditions put forth by Permit to Install No. 42-15E.

EUMOLDING

This Emission Unit table addresses the 14 injection molding presses that produce headlight and taillight lenses and housing frames.

I. Emission Limits

Special Condition (SC) I.1 limits the VOC emissions from the injection molding presses to 2 tons per year of VOC, based on a 12-month rolling time period. I was provided with a recordkeeping spreadsheet titled "Air Permit Recordkeeping – May 2023" that includes tabs for EUMOLDING and 12 month rolling emission totals for the facility. The spreadsheet shows that for May 2023, the 12 month rolling VOC emissions were 0.2327 tons. A copy of the spreadsheet is attached to this report. Compliance.

II. Material Limits

There are no material limits put forth for this Emission Unit in this PTI.

III. Process/Operational Restrictions

SC III.1 requires that the facility capture all waste mold release, cleaner and degreaser agent, store them in closed containers and dispose of them in an acceptable manner. Magna uses aerosol cans to apply these agents. As mentioned in the "Inspection Narrative" section of this report, Magna has an on-site aerosol can recycling process, a picture of which is included with this report for reference. The process consists of two

drums that are located along the wall in front of the molding presses. One of the drums serves as a puncture drum that is equipped with a device on top of it that punctures the waste aerosol cans and drains any remaining material into the drum for disposal. The other drum collects the empty cans. The aerosol can collection system is equipped with a carbon filter, and the filter is equipped with a breakthrough monitor. At the end of the month, the number of cans that were processed in the aerosol can recycling drums is counted, and the facility keeps records of this information. Garry told me that the facility is classified as a small quantity generator. The facility is in compliance with the requirements of this condition.

IV. Design/Equipment Parameters

SC IV.1 requires that EUMOLDING be equipped with HVLP applicators or comparable technology, or that hand-held aerosol cans and wipes be used. Magna uses hand-held aerosol cans to apply mold release and cleaners. Compliance.

V. Testing/Sampling

There are no testing/sampling requirements in the PTI for EUMOLDING.

VI. Monitoring/Recordkeeping

The facility is **in compliance** with the special conditions (VI.1 through VI.3) in this section. Per SC VI.1, Magna maintains the required records in the required timeframes.

SC VI.2 requires that the facility maintain a current listing of the chemical composition of each mold release from the manufacturer. Garry showed me all of this information, in the form of Safety Data Sheets (SDS), for the materials used in association with EUMOLDING. I was provided with a copy of the SDS for the Talon Ultra Low VOC Brake Cleaner, which has the highest volume/usage. The SDS is attached to this report for reference.

SC VI.3 requires that monthly records be kept for the amount of mold release, cleaner and degreaser agent used, the VOC content of these materials, the VOC mass emissions, and the 12 month rolling VOC emissions. The previously mentioned "Air Permit Recordkeeping – May 2023" spreadsheet has a tab titled "Emission Estimates for EUMOLDING" that presents the amount of mold release and mold cleaner used in May 2023, the VOC content of the material, and the monthly VOC emissions from the use of each of these materials for May 2023. A copy of this spreadsheet is attached to this report. The 12 month rolling VOC emissions are found in the tab titled "12 Mo Total".

VII. Reporting

There are no reporting requirements put forth in this PTI.

VIII. Stack/Vent Restrictions

There are no stack parameters specified in the PTI for EUMOLDING.

IX. Other Requirements

There are no conditions in this section of the PTI.

EUFIREPUMP

This Emission Unit addresses the 142 kW (190 hp) diesel fuel-fired emergency engine at the facility that was manufactured in 2014.

I. Emission Limits

Special Conditions (SC) I.1 through I.3 limit emissions of NMHC+NO_x, CO and PM from the fire pump engine in accordance with Table 4 of 40 CFR Part 60, Subpart IIII (Standards of Performance for Stationary Compression Ignition Internal Combustion Engines). The initial PTI application for the facility (for PTI No. 42-15) includes a description of the fire pump engine (it is described as a 177 kW Clarke Fire Pump with a John

Deere diesel fired engine), and a copy of the engine specification sheet for the engine. The engine is classified as an EPA certified engine, and the specification sheet provides certified emissions information – HC+NOx = 3.8 g/kW-hr, CO = 1.2 g/kW-hr, and PM = 0.13 g/kW-hr. The manufacturer certified emission numbers are in compliance with the permitted limits.

II. Material Limits

SC II.1 limits the facility to only firing diesel fuel in the fire pump having a maximum sulfur content of 15 ppm and a minimum Cetane index of 40 or a maximum aromatic content of 35 volume percent. Magna samples every load of diesel fuel that is received at the facility, and they contract with Paragon Laboratories to have the fuel sampled. I was provided with a copy of the analysis dated May 15, 2023 that was performed on a sample taken on May 4, 2023. The analysis provided a sulfur content of 8.6 ppm and a Cetane number of 43.9. A copy of the fuel analysis is attached to this report for reference.

III. Process/Operational Restrictions

SCs III.1 and 2 put forth monthly and 12 month rolling usage/hours restrictions on the engine. The facility's recordkeeping spreadsheet has a tab titled "Records for EUFIREPUMP" that presents the number of maintenance/test hours, the non-emergency hours, and the emergency use hours for each month, the total hours of usage for each month, and the 12-month rolling usage. A copy of the records is attached to this report. The facility is in compliance with the requirements of these conditions.

The facility is in compliance with SC III.3. The engine is a certified engine, and Magna operates and maintains the engine in accordance with the manufacturer's emission-related instructions.

SC III.4 is not applicable as the fire pump engine is a certified engine that is operated in a certified manner.

IV. Design/Equipment Parameters

The facility is in compliance with SCs IV.1 and 2. The engine is equipped with a non-resettable hours meter, and the facility maintains the manufacturer's certification for the engine that includes the power rating of the engine.

V. Testing/Sampling

The facility meets the testing requirements in SC V.1 by having a certified engine, and by operating the engine in a certified manner.

VI. Monitoring/Recordkeeping

The facility is **in compliance** with the special conditions (VI.1 through VI.4) in this section. Per SC VI.1, Magna maintains the required records in the required timeframes.

SC VI.2 requires that the facility maintain records of manufacturer certification documentation indicating that the fire pump meets the emission standards in Subpart IIII, and, if the engine becomes uncertified, the facility must keep records of a maintenance plan and associated maintenance activities. There is no indication that the fire pump engine has become uncertified, and the facility maintains records of the manufacturer certification documents.

For SC VI.3, the facility maintains engine usage/hours of operation records, on a monthly and 12 month rolling time period basis. Magna also maintains records of fuel analyses for each delivery of diesel fuel to the facility, in compliance with the requirements of SC VI.4.

VII. Reporting

SC VII.1 requires that Magna submit a notification to the AQD District Supervisor that specifies whether the fire pump will be operated in a certified manner. Magna submitted correspondence dated April 6, 2016 stating that the fire pump will be operated in a certified manner. SC VII.2 is not applicable as the engine has not been operated for the purpose of contracted emergency power generation.

VIII. Stack/Vent Restrictions

SC VIII.1 puts forth a stack parameter of a minimum height of 1 foot above grade. The stack parameter was not verified during this site visit.

IX. Other Requirements

The operation of the engine in reference to all of the applicable provisions of 40 CFR Part 60 Subpart IIII was not fully evaluated as part of this site visit, by the operation of the engine appears to be in substantial compliance with the applicable provisions of 40 CFR Part 60 Subpart IIII.

FGCOATING

This Flexible Group puts forth the permit special conditions for the EUANTI-FOG and EUHARDCOAT Emission Units.

I. Emission Limits

Special Condition (SC) I.1 limits the VOC emissions from the two types of coating lines to 29.0 tons per year of VOC, based on a 12-month rolling time period. The facility's "Air Permit Recordkeeping – May 2023" spreadsheet includes a tab titled "12 Mo Total" that presents the monthly VOC emissions for FGCOATING. The spreadsheet shows that for May 2023, the 12 month rolling VOC emissions associated with FGCOATING were 14.5272 tons. A copy of the spreadsheet is attached to this report. Compliance.

II. Material Limits

There are no material limits put forth for this Flexible Group in this PTI.

III. Process/Operational Restrictions

SC III.1 requires that the facility capture all waste materials and store them in closed containers, and dispose of waste materials in an acceptable manner. During the site visit, we discussed the facility's waste material management procedures, including for waste coating materials. Recall that the overspray from the hardcoat line is captured to reclaim the paint solids, which are recycled for reuse and reapplication. I was told during the last site visit that the coating materials are mixed and have a set cure time, so they must be applied within a week, and this was affirmed. The coating that is left at the end of the week is collected and placed in a hazardous waste drum that has a flame-arrested flume that is closed to the ambient air. The waste paint is collected and taken offsite at the end of the month. Garry told me that the facility is classified as a small quantity generator (SQG).

SC III.2 requires that spent filters be disposed of in a responsible manner. The facility collects the spent filters, as well as rags, and stores them in a closed container. The collected material is taken offsite at the end of the month, and it is sent to a waste to energy facility out of state.

SC III.3 requires that VOC and HAP containing materials must be handled to minimize air emissions. The facility mixes the coatings in a chemical dispensing room (they refer to it as a material mix closet), and the coating application is performed in enclosed booths.

SC III.4 addresses the capture of the hardcoat material to recycle the paint solids, and includes AQD's meaningful change language. Magna is using IPA and sec-butyl to recycle the coating solids, and is in compliance with this condition.

IV. Design/Equipment Parameters

The facility is in compliance with SC IV.1; whenever the coating lines are used, a three-stage filter system is in operation to treat the booth air. The facility has a preventative maintenance plan for the booths and three-stage filter systems.

SC IV.2 requires that FGCOATING be equipped with HVLP applicators or comparable technology, and that for HVLP applicators, the facility keep test caps for pressure testing. The facility utilized HVLP applicators, and test caps are tested quarterly.

V. Testing/Sampling

SC V.1 requires that the facility maintain Method 24 information that demonstrates the VOC content, water content and density of the coating materials. During my last site visit, Garry described to me how RTI Laboratories performs the Method 24 testing for the facility, and he confirmed that the information for the coatings currently being used is on file.

VI. Monitoring/Recordkeeping

The facility is **in compliance** with the special conditions (VI.1 through VI.3) in this section. Per SC VI.1, Magna maintains the required records in the required timeframes.

SC VI.2 requires that the facility maintain a current listing of the chemical composition of each coating-related material. I was shown the Safety Data Sheets (SDS) for the coating materials, and I requested was provided with the SDS for the hard coat material, which is attached to this report.

SC VI.3 requires that daily records be kept for the amount of coating and associated materials used, the VOC content of these materials, the monthly VOC mass emissions, and the 12 month rolling VOC emissions. This information is tracked and recorded via the previously mentioned spreadsheets that Garry and Duane maintain. The FGCOATING tab presents the daily coating usage and the VOC content of the materials, and the 12 Mo Total tab presents the monthly and 12 month rolling VOC emissions for FGCOATING.

VII. Reporting

SC VII.1 requires that the AQD District Supervisor be notified of the completion of the installation, construction, reconstruction, relocation or modification authorized by the PTI within 30 days of completion, and further states that the completion is considered to occur not later than the commencement of the trial operation of the third anti-fog coating line, EUANTI-FOG-3. This Emission Unit has not yet commenced installation.

VIII. Stack/Vent Restrictions

The stack parameters specified in the PTI for FGCOATING were not verified during the site visit.

IX. Other Requirements

There are no conditions in this section of the PTI.

FGRULE632

This Flexible Group addresses the four coating lines that are permitted, as well as “equipment covered by other permits, grandfathered equipment, and exempt equipment”. It addresses all plastic parts coating lines within the facility stationary source pursuant to Michigan Administrative Rule 632(15)(a).

I. Emission Limits

Special Condition (SC) I.1 limits the VOC emissions from the plastic parts coating lines and other specified equipment to 30.0 tons per year of VOC, based on a 12-month rolling time period. The facility’s “Air Permit Recordkeeping – May 2023” spreadsheet includes a tab titled “12 Mo Total” that presents the monthly VOC emissions for FGCOATING. The spreadsheet shows that for May 2023, the 12 month rolling VOC emissions associated with FGCOATING were 14.5272 tons. This equipment represents the only plastic parts coating processes at the facility.

II. Material Limits

There are no material limits put forth for this Flexible Group in this PTI.

III. Process/Operational Restrictions

There are no process/operational restrictions put forth for this Flexible Group in this PTI.

IV. Design/Equipment Parameters

There are no design/equipment parameters put forth for this Flexible Group in this PTI.

V. Testing/Sampling

SC V.1 requires that the facility maintain Method 24 information that demonstrates the VOC content, water content and density of the coating materials. As mentioned in the discussion for FGCOATING, this information is maintained on file by facility staff.

VI. Monitoring/Recordkeeping

The facility is **in compliance** with the special conditions (VI.1 through VI.3) in this section. Per SC VI.1, Magna maintains the required records in the required timeframes.

SC VI.2 requires that the facility maintain a current listing of the chemical composition of each coating-related material. I was shown the Safety Data Sheets (SDS) for the coating materials, and I requested was provided with the SDS for the hard coat material, which is attached to this report.

SC VI.3 requires that monthly records be kept for the amount of coating and associated materials used, the VOC content of these materials, the monthly VOC mass emissions, and the 12 month rolling VOC emissions. This information is tracked and recorded via the previously mentioned spreadsheets that Garry and Duane maintain. The FGCOATING tab presents the daily coating usage and the VOC content of the materials, and the 12 Mo Total tab presents the monthly and 12 month rolling VOC emissions for FGCOATING.

VII. Reporting

There are no reporting requirements put forth for this Flexible Group in this PTI.

VIII. Stack/Vent Restrictions

There are no stack/vent restrictions put forth for this Flexible Group in this PTI.

IX. Other Requirements

There are no conditions in this section of the PTI.

FGFACILITY

This Flexible Group puts forth source-wide HAP opt-out emission limits for the Magna facility.

I. Emission Limits

Special Conditions (SC) I.1 limits the individual HAP emissions for the facility to less than 9.0 tons per year, SC I.2 limits the aggregate HAP emissions from the facility to less than 22.5 tons per year, respectively. The facility's recordkeeping spreadsheet has a tab titled "HAPS" that provides the HAP emissions from the materials used at the facility for each month. I was provided with the information for May 2023. The "12 Mo Total" tab provides the 12-month rolling time period emission totals associated with FGFACILITY, which includes individual HAPs and total HAPs. The 12 month rolling totals for May 2023 show 0.2044 tons of total HAPs. Compliance.

II. Material Limits

There are no material limits put forth for this Flexible Group in this PTI.

III. Process/Operational Restrictions

There are no process/operational restrictions for this Flexible Group.

IV. Design/Equipment Parameters

There are no design/equipment parameter permit conditions for this Flexible Group.

V. Testing/Sampling

SC V.1 requires that the HAP content of the materials used at the facility be determined using manufacturer's formulation data. The company maintains the SDS for the coatings and materials used at the facility. Compliance.

VI. Monitoring/Recordkeeping

The facility is **in compliance** with the special conditions (VI.1 through VI.3) in this section. Per SC VI.1, Magna maintains the required records in the required timeframes.

SC VI.2 requires that the facility maintain a current listing of the chemical composition of each coating-related material. As described in the write up for FGCOATING, the facility maintains Safety Data Sheets for the materials used at the facility that contains this information.

SC VI.3 requires the monthly records be kept for the amount of HAP containing materials used at the facility, the HAP content of these materials, the individual and aggregate HAP mass emissions, and the 12-month rolling individual and aggregate HAP emissions. This information is tracked and recorded via the recordkeeping spreadsheet for the facility. The information is attached to this report for reference.

VII. Reporting

There are no reporting requirements put forth for this Flexible Group in the PTI.

VIII. Stack/Vent Restrictions

There are no stack parameters specified in the PTI for FGFACILITY.

IX. Other Requirements

There are no conditions in this section of the PTI.

Regulations

The terms and conditions of PTI NO. 42-15E serve to limit potential emissions of VOC and HAPs to below major source thresholds. For the purposes of HAP emissions, the Magna facility is an area source. Combustion related emissions from the facility are relatively small, well below major source thresholds.

As mentioned previously in this report, the fire pump engine that is addressed in the facility's PTI as EUFIREPUMP is subject to 40 CFR Part 60, Subpart IIII.

Compliance Determination

Based upon the results of the June 26, 2023 site visit and a review of the facility's compliance records, the Magna facility in Plymouth Township appears to be **in compliance** with applicable rules and regulations, including with the terms and conditions of Permit to Install No. 42-15E.

NAME Steve WiersDATE 11/20/23SUPERVISOR JK