

**DEPARTMENT OF ENVIRONMENTAL QUALITY  
AIR QUALITY DIVISION  
ACTIVITY REPORT: Scheduled Inspection**

N636428873

FACILITY: Pilkington-NSG North America, Inc.		SRN / ID: N6364
LOCATION: 2121 W CHICAGO RD, NILES		DISTRICT: Kalamazoo
CITY: NILES		COUNTY: BERRIEN
CONTACT: Eric Quinn, EHS Manager		ACTIVITY DATE: 03/12/2015
STAFF: Matthew Deskins	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: Unannounced Scheduled Inspection		
RESOLVED COMPLAINTS:		

On March 12, 2015 AQD staff (Matt Deskins) went to conduct an unannounced scheduled inspection of the Pilkington North America facility located in Niles, Berrien County. The purpose of the inspection was to determine the facilities compliance with air quality regulations, Permit No. 570-96A (Opt-Out), and Consent Order No. 10-2005. The consent order was issued in May of 2005 and was to be in effect for one year, however, the facility hasn't requested that it be terminated as of yet. Staff departed for the facility after inspecting another facility nearby and having lunch.

Staff arrived at the facility at approximately 1:15 p.m. Staff went into a glass enclosed entrance area where there is a sign in sheet, company policies, and a phone along with a facility contact list. The contact list indicated that Eric Quinn, my contact during previous inspections, was still the Environmental Health and Safety Manager (EHS). Staff called the number listed but it just went to his voice mail. Staff then tried several other people before finally reaching the controller for the facility. Staff mentioned to the controller who they were, why they were there, and asked if Eric Quinn was available. The controller said that Eric was in today and that she would page him to let him know staff was present. Eric came out to greet staff several minutes later. Staff introduced them self to Eric and stated the purpose of the visit. Eric then led staff to a conference room where staff then gave him a copy of the DEQ "Environmental Inspection Brochure" and a business card. Staff then explained what the inspection would entail and the following is a summary of staff's discussions with Eric, facility operations, and a review of the recordkeeping requirements.

According to Eric, Pilkington North America is owned by Nipon Sheet Glass (NSG) and they currently employ approximately 340 people at the Niles facility. Eric said that he works full time at the Niles location now because their facility in Clinton had been closed down. He went on to say that business has been good and that they are currently operating three shifts five days per week with some Saturdays if demand requires it. He said that 1<sup>st</sup> shift operates at 100% capacity from 8 a.m. to 4p.m., 2<sup>nd</sup> shift runs at about 70% capacity from 4 p.m. to 12 a.m., and 3<sup>rd</sup> shift typically runs at about 50% capacity from 12 a.m. to 8 a.m. The facilities main business still revolves around automobile windows and sunroofs that they may add various components (brackets, clips, etc.) to for Tier 1 and Tier 2 suppliers. They still have a wide customer base and their products could be used on just about any vehicle by any automobile manufacturer.

Staff then asked about the current equipment that they have at the plant and if it has changed any since the last inspection. Eric said that they still have the original 12 injection molding presses and 1 new one that they are in the process of installing under the AQD Rule 287(c) permit exemption. They also have 2 light assembly "cells" that were relocated from their Clinton facility that was closed down. These were installed in 2009/2010 under the AQD Rule 287(c) permit exemption also and they had notified the AQD about it. These 2 assembly cells are robotic/automated. Staff then mentioned the Consent Order the facility entered into back in 2005 that the AQD still hasn't received a request to terminate yet. Eric mentioned he thought it automatically terminated and staff mentioned that the company has to submit a written request to our Division Chief. Eric said he still has a copy of the CO and will look into it. Staff then reviewed records with Eric and staff's observations will be discussed later in this report. Staff and Eric then went out to the production area. The following is what staff observed.

The basic process for each injection press and/or cell at the facility is as follows although there could be an additional step or two depending on the customer specifications: Pilkington receives pre-cut window glass that has already been painted around the edges as well as having other things such as the defrost lines installed, depending on the vehicle and manufacturer. They then apply a two part primer through the use of what looks like a shoe polish applicator to areas where they will eventually need to have the PVC to stick. The primer application can be done either manually or robotically although Eric said that

most is applied manually still. Staff then asked about the primer and if it still requires constant agitation after the two primer components are mixed. Eric said that they have a store keeper that does all the primer mixing for each assembly press and/or cell and tracks all usage. He said that it does have a very short shelf life so they do have to keep it agitated somewhat after mixing. He went on to say that maximum primer usage for each press/cell is 4 to 5 quarts per 8 hour work shift. After the primer is applied, the glass might then go through an infrared heater to pre-heat it for set-up if required. The glass then goes to an automated aligner that puts the glass in the exact position that is needed. It then goes through another infrared heater to re-heat the primer and glass. It then goes to encapsulation where the PVC is injected and gets molded around the edges of the glass. The glass then gets any excess PVC trimmed off manually where it's not wanted. They then clean the glass and apply another primer if the customer requires it. It then goes to a curing station where they add clips or any other accessories if required. Accessories may also be added during the encapsulation process depending on the part specification. They then package it for shipping.

Staff and Eric then proceeded to other areas of the facility. Staff noted that they appeared to still have the 5 heaters in the building that they had previously. They are all fired on natural gas and were each rated at 4.6 million btu/hr. These are exempt under AQD Rule 282(b). All the machining equipment in the maintenance area vents inside and is therefore exempt under AQD Rule 285(l)(vi). Staff did not observe any parts cleaners during the walk through. Staff then proceeded with Eric back out into the lobby area. Staff thanked Eric for his time and departed the facility at approximately 2:45 p.m.

As mentioned earlier, Staff looked at records prior to going on the tour of the facility with Eric. The permit for the facility lists seven emission units and they are as follows: EUCCELLCOAT, EUPRESSES, EUSLIPCOAT1, EUSLIPCOAT2, EUSLIPCOAT3, EUSPRAYCOAT, AND EUMIXINGSTATION. As mentioned in the previous inspection report write-ups, the only remaining processes located at the facility would fall under EUPRESSES and EUMIXINGSTATION. The facility dismantled and got rid of the cellcoat, slipcoat, and spraycoat operations. As mentioned earlier, the facility does have an additional press as well as two light assembly cells installed under the AQD Rule 287(c) permit exemption. Compliance with the exemption will be mentioned after the discussion of the permit special conditions. The following indicates the special condition numbers of their permit and what staff reviewed and noted. Please note that the consent order entered into by facility just entailed the requirements of Special Condition #3.

**SC #1:** The facility is maintaining records that indicated that the VOC emission rates do not exceed 180 pounds per day nor 33 tons per year based on a 12-month rolling time period. Records staff reviewed indicated the highest daily total for the previous 12 months for VOCs was about 104 pounds and the 12-month rolling total being 10.8 tons.

**SC #2:** The facility is maintaining records that indicate total HAP emissions do not exceed the 22.5 ton permit limit based on a 12-month rolling time period. Records reviewed by staff showed a high of 3.2 tons. The facility is maintaining monthly emission records for individual HAPs and totals based on a 12-month rolling time period. Toluene typically is the HAP with the highest 12 month rolling amount at approximately 2.7 tons.

**SC #3:** The facility is keeping records of the following as required: 1) product manufacturer formulations 2) days of operation each month 3) The identification of the product used, it's VOC content, the monthly total amount used, and the mixing ratio, if any, of any solvent, reducer, or thinner used 4) the HAPs in any products and the % content 5) the monthly VOC emissions in pounds per day 6) the monthly VOC, individual HAP, and total HAP emissions in tons per month 7) the 12-month rolling emission totals for VOCs, individual HAPs, and total HAPs.

**SC #4:** The facility is calculating VOC emissions in an acceptable manner.

**SC #5:** The facility no longer does any spray coating but it does have approval to use manufacturer's formulation data to determine VOC content of coatings used.

**SC #6:** Not-Applicable. The slipcoat operations have been removed. This condition required that they couldn't be operated unless exhaust filters were in place and operating properly.

**SC #7:** Not Applicable. The facility no longer has High Volume Low Pressure (HVLP) guns as applicators because the slipcoat operations have been removed.

SC #8: The facility does exhaust discharge gases through appropriate stacks in EUPRESSES. The exhaust stacks have been removed for the slipcoat operations.

SC #9: The facility stores any waste in sealed 55 gallon containers. They are classified as a small quantity hazardous waste generator.

SC #10: The facility appears to be calculating HAPs emissions in an acceptable manner.

SC #11: The facility is using manufacturer's formulation data to determine the HAP content of products used as is allowed.

Overall the facility appears to be in COMPLIANCE with its recordkeeping requirements contained in Permit No. 570-96A and Consent Order No. 10-2005. The additional press and the 2 light assembly cells appear to be meeting the AQD Rule 287(c) permit exemption. The facility only uses 3 to 4 gallons a day of primer per injection press and/or light assembly cells which would be well below the allowable 200 gallons per month for each unit.

NAME Matt Dahl

DATE 3-20-15

SUPERVISOR MD 3/20/2015