

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

N178136548

FACILITY: Magna Mirrors Corporation		SRN / ID: N1781
LOCATION: 3575 128th Aveune, HOLLAND		DISTRICT: Grand Rapids
CITY: HOLLAND		COUNTY: OTTAWA
CONTACT: Andy Garceau , EHS Specialist		ACTIVITY DATE: 08/09/2016
STAFF: April Lazzaro	COMPLIANCE STATUS: Non Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: Unannounced, scheduled inspection.		
RESOLVED COMPLAINTS:		

Staff, April Lazzaro and Chris Robinson arrived in the area to conduct an unannounced, scheduled inspection. There were no odors originating from any Magna Mirrors facility identified.

FACILITY DESCRIPTION

Magna Mirrors, SRN N1781, is an automotive parts supplier that consists of four buildings. Two are located at 3501 John F. Donnelly (JFD) Drive (north and south) and are named Magna Engineered Glass. The other two buildings are located at 3575 128th Avenue (north and south) and are named Magna Mirrors Holland. The facilities operate pursuant to Opt-out Permit to Install No. 188-04D. The emission unit (EU) and flexible group (FG) of the permit does not flow with how the inspection was conducted, so each EU and FG will be described below with regard to what facility it is located in. The Magna Engineered Glass facility used to manufacture appliances, but no longer does.

COMPLIANCE EVALUATION

Staff approached the Magna Mirrors- Holland facilities to conduct the first portion of the Full Compliance Evaluation (FCE) and met with Andy Garceau, Environmental, Health and Safety Specialist. Mr. Garceau was provided with the DEQ Environmental Inspections: Rights and Responsibilities brochure and its contents were discussed. Mr. Garceau contacted facility consultant Bruce Connell, EPI, to join us. Mr. Garceau also contacted Scott Sikkema who assisted us with equipment and maintenance questions as needed. Both were very knowledgeable of plant operations.

After lunch, we approached the Magna Engineered Glass facilities to conduct the second portion of the FCE and met with Ethan Meyer, EHS specialist. Mr. Meyer was provided with the DEQ Environmental Inspections: Rights and Responsibilities brochure and its contents were discussed. He was very knowledgeable of plant operations.

EU-RIMPRIME

This emission unit is located in the JFD south facility of Magna Engineered Glass. Zero of these booths are in existence at this time. Mr. Meyer indicated that the priming is done by hand, not sprayed in a booth.

This EU is limited to 10.0 tons VOCs per 12-month rolling time period. Current reported emissions through July 2016 are 4.1 tons. According to Mr. Meyer's consultant, Mr. Connell, the facility no longer has any spray booths. Recordkeeping for the emissions associated with EU-RIMPRIME are being recorded.

EU-SILVERLINE

This emission unit is located at the 128th north facility of Magna Mirrors- Holland and is a coating line which applies layers of coating onto a piece of glass to form the silver reflective coating and makes the mirror surface.

This EU is limited to 18.3 tons VOCs per 12-month rolling time period and 3,900 lb/yr cumene per 12-month rolling time period. Current reported VOC emissions through July 2016 are 9.13 tons. AQD requested manufacturer's formulation date information from Magna staff which was provided. However, the information was last updated in 2011, which is not an acceptable time frame. Staff requested updated records from the manufacturer, as well as Magna staff. These were received and changes to the coating formulation have been made that are not reflected in the recordkeeping. The VOC content of the ocean blue top coat has changed from 4.24 lb/gal to 4.42 lb/gal, which results in an increase of ~1/2 ton of VOC emissions per year. A review of the permit application file containing information related to permit modification No. 188-04C was retrieved and a review was conducted. It was at this time, AQD staff noted that the permit modification was to utilize a Reddish Basecoat and a Green Top Coat in the silver line process. This was confusing since Mr. Garceau provided information on a Gray Curtain Coat and an Ocean Blue Top Coat. I called Mr. Garceau on September 8, 2016 and asked about the reddish and green coatings and he said they are not using them, and have not since he's been at Magna. I requested if he has a Rule 285 meaningful change demonstration available to submit. He checked his files and indicated he did not, but that he would contact his consultant, Bruce Connell to see what the status was. It appears as though the facility has changed coatings without seeking a permit modification. On September 9, 2016 AQD received the Rule 285 meaningful change demonstration. Upon review of the information provided and a review of the permit application, an error in the data was identified. The spreadsheet provided by Magna incorrectly lists the toxic air contaminant and HAP, cumene as a constituent of the Green Top Coat. Cumene is not present in the data sheet that was provided to AQD in the PTI application. Furthermore, staff looked at the 2012 application information, specifically the permit writer's toxic air contaminant spreadsheet and was able to confirm that no cumene emissions were evaluated as a constituent of the Green Top Coat during the permit process. When cumene is removed from the spreadsheet, the hazard potential of the coating changes from 0.502 to 0.270. The current Ocean Blue Top Coat has a hazard potential of 0.306. This hazard potential of the current coating is greater than the allowable 10% difference, and therefore the change in coatings requires a PTI modification. This is in violation of Rule 201, for failure to obtain a permit for the coating change. The facility currently is adding N-butyl Acetate as a thinner to the coatings which was not evaluated in the Rule 285 demonstration.

Due to the fact that the permittee did not have a current listing from the manufacturer of the chemical composition of the materials used at the facility, in addition to changing the coatings used without conducting an evaluation for meaningful change, a Violation Notice will be cited for EU-SILVERLINE Special Condition (SC) VI.2. The cumene content of the blue top coat in use is 0.08% per the updated EDS. The permittee is currently recording the old value of 0.02% and the records need updating to reflect the change. This is a violation of EU-SILVERLINE VI.4.c-e.

The permittee was operating the thermal oxidizer properly and with an adequate temperature of 1,550°F at the time of the inspection. We conducted an external inspection of the unit. It appeared physically intact, however at the flexible seal connecting the inlet uncontrolled fumes to the hard piped ductwork, solvent odors were identified. A thorough visual examination of the area did not identify an obvious hole or gap, however all present were able to smell the solvent. Magna staff committed to having the flexible seal inspected and replaced ASAP. Additionally, a review of the most recent Malfunction Abatement Plan identified some inadequacies, as well as extraneous information. Staff provided a copy of the plan to Mr.

Sikkema who said he would re-evaluate the program to ensure it fits with the current PM that they conduct. Mr. Garceau indicated on September 8, 2016 that they got a quote to replace the flex seal, but it seemed high. They will have the company who does the annual inspection also provide an evaluation and quote. This will be done in the next month.

EU-MIRSEAMING

This is located in the 128th north facility of Magna Mirrors- Holland.

AQD staff was unable to locate a Preventative Maintenance Plan (PMP) for the baghouse in this EU, however based on previous inspection reports it has been submitted. Staff discussed this with Mr. Sikkema and Mr. Garceau who indicated they would review their internal PM's and get a formal plan re-submitted. This will be reviewed upon receipt. Upon visual inspection, the baghouse appeared clean and functionality good. Follow-up from Mr. Garceau indicated that the baghouse PMP revision was nearly complete.

FG-RIMPRESS

This is located in the JFD south facility of Magna Engineered Glass.

In the FG description, this establishes that there are three EU's permitted for this FG. However, the facility is currently operating eight EU's. It appears as though the facility installed the 5 additional RIM presses under the Rule 286(e) exemption, and is keeping record of emissions as a part of this FG. The FG is limited to 12.0 tons VOC per 12-month rolling time period. Reported VOC emissions through July 2016 are 1.35 tons VOC. Monthly records are being maintained.

FG-BONDINGPROCESS

This is located in the JFD south facility. Nine units are currently in use.

This FG is limited to 30.0 tons VOCs per 12-month rolling time period. Current reported emissions through July 2016 are 7.2 tons. Phenyl diethanolamine is limited to 1.8 tons per 12-month rolling time period. Current reported emissions through July 2016 are 0.6 tons. The facility was able to produce a diagram that indicates nine EUBONDING cells are identified on the maps provided. The maps were dated 4/8/15, and should be updated. Changes to the materials have been made, and the permittee was not maintaining a current listing from the manufacturer. This had not been properly maintained, during the last inspection, and at that time in 2011 the facility was given additional time to conduct Rule 285 "meaningful change" demonstrations. Some of the SDS information provided was very outdated, and was as old as 2007. Due to the fact that the permittee did not have a current listing from the manufacturer of the chemical composition of the materials used at the facility, a Violation Notice will be cited for FG-BONDING Special Condition (SC) VI.2.

FG-PLASTICPARTSCOATING

This is located in the JFD south facility. During the last inspection the company reported this was not taking place, however it is again.

This FG limits VOC emissions from plastic parts coating operations to 30.0 tons per 12-month rolling time period. Current reported emissions through July 2016 are 20.6 tons.

The permittee is maintaining daily records on clip boards at each automated booth. This information is then tallied at the end of the week, then month to achieve accurate emissions information.

FG-ECMIRRORS

This equipment is still in the construction phase.

FG-FACILITY

This FG limits each individual HAP to less than 9.0 tons per 12-month rolling time period. The highest reported HAP through July 2016 is xylene at 2.66 tons. Aggregate HAPs are limited to less than 22.5 tons per 12-month rolling time period. The reported aggregate HAP emissions through July 2016 are 8.23 tons.

Total VOCs are limited to less than 90.0 tons per 12-month rolling time period. The total VOC emissions reported through July 2016 are 69.2 tons.

COMPLIANCE SUMMARY

Magna Mirrors was in non-compliance at the time of the inspection. See attached CD for records and correspondence.

NAME 

DATE 9-15-16

SUPERVISOR 