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

N505649465

FACILITY: Magna Mirrors Corporation - Newaygo		**SRN / ID:** N5056
LOCATION: 700 S. Park Dr., NEWAYGO		**DISTRICT:** Grand Rapids
CITY: NEWAYGO		**COUNTY:** NEWAYGO
CONTACT: Brandon Doom , Environmental Health and Safety Specialist		**ACTIVITY DATE:** 07/10/2019
STAFF: Adam Shaffer	**COMPLIANCE STATUS:** Compliance	**SOURCE CLASS:** MAJOR
SUBJECT: Scheduled unannounced inspection.		
RESOLVED COMPLAINTS:		

Air Quality Division (AQD) staff Adam Shaffer (AS) arrived at the Magna Mirrors, Inc. (MM) facility located in Newaygo, MI at 10:18 am on July 10, 2019 to complete a scheduled unannounced inspection. The weather conditions at the time of the inspection were mostly cloudy, upper 70's °F and winds from the south/southwest at 5-10 mph. Prior to entering the facility offsite odors and visible emission observations were completed. A plastic odor was noted to the north/northeast of the site. No recent complaints have been received regarding MM from surrounding sites. No emissions were observed.

Facility Description

MM manufactures and coats plastic automotive parts ranging from automobile mirrors to door handles. All parts manufactured and coated on site are plastic, though MM is permitted to coat metal automotive parts. The facility is a major source of volatile organic compounds (VOCs) and is in operation with Renewable Operating Permit (ROP) No. MI-ROP-N5056-2016.

Offsite Compliance Review

- **MM is required to submit semi-annual and annual compliance reports per Part A General Conditions 19-23 of MI-ROP-N5056-2016. Semi-annual compliance reports were reviewed since the previous inspection on 09/08/2017. In semi-annual and annual compliance reports since then several excursions have been reported for each time period. Follow up responses with MM staff have determined that various steps have been completed by the company to fix the number of excursions being reported. Magnehelic gauges had been installed in order to monitor the filter resistance and make the appropriate changes before they became an issue. The checking of the magnehelic gauges was added to the inspection checklist and training was completed for employees. While speaking with MM staff, it was also noted that employees had been overcritical of reported excursions. The semi-annual compliance report received for 2019 indicated no excursions have occurred from 01/01/19 – 06/30/19. Based on this, it appears that this issue has been adequately addressed.**
- **It was later identified following the site inspection that an additional deviation had occurred on May 10, 2018 and was similar to a previous deviation with an open and unattended lid in the EUCLEANUP/PURGE area. The unattended lid was addressed similarly as the first reported deviation. After further review, MM shall resubmit the applicable semi-annual and annual compliance reports to include the unaccounted-for deviation. No additional action is necessary.**
- **Based on the timing of the inspection, the 2018 Michigan Air Emissions Reporting System (MAERS) Report has already been received and reviewed by the AQD. Upon review of the 2018 MAERS Report for MM, the report appeared acceptable and was approved. One minor issue was noted with a control efficiency of 1.4% for EUCLEANUP/PURGE. A follow up phone conversation with MM staff concluded that most emissions from the kitchen area are vented uncontrolled and minor amounts are controlled through the paint booths. A mass balance equation was used in calculating the reported emissions for this emission unit and was concluded to be acceptable. The 2018 MAERS Report for MM located in Newaygo, MI was determined to be acceptable. Reported emissions appear to be similar to records provided during the inspection process.**

Compliance Evaluation

Upon entering the site, AQD staff AS met with Mr. Loren Ulrey, Assistant Paint Manager, and Mr. Jason Pond, Assistant General Manager, who provided a tour of the facility and answered site specific questions. AQD staff AS followed up with Mr. Brandon Doom, Environmental Health and Safety Specialist, and Ms. Michelle Stewart, EHS Supervisor, to request applicable records following the inspection.

MI-ROP-N5056-2016

Source Wide Conditions

MM is subject to source wide individual and aggregate hazardous air pollutant (HAP) emission limitations of less than 10.0 tons per year (tpy) and less than 25 tpy respectively per a 12-month rolling time period. Records were requested and reviewed back to May 2018. For May 2019, the total aggregate HAPs emitted was 0.66 tons. As of May 2019, 8.07 tons of aggregate HAPs were emitted per a 12-month rolling time period which is within the limit for both individual and aggregate HAPs. Previous individual and aggregate HAP 12-month rolling time periods reviewed were also within permitted limits. Reviewing the records, individual HAP emissions were separated out with the most emitted HAP for May 2019 being Diethylene Glycol Phenyl Ether (CAS # 124-17-4).

Per Special Condition (SC).V.I, MM shall use Manufacturer's Formulation Data Sheets to determine the HAP content for any coatings, conductive prep solution, reducer, clean-up and/or purge solvent, and any other materials used. After speaking with staff and reviewing records this appeared to be being completed.

Per SC.VI.2.a-e, MM shall keep track of usage rages of each HAP containing material, reclaim, if applicable, of each material, HAP contents and individual/aggregate HAP emissions per monthly and 12-month rolling time periods. Records were requested and reviewed back to May 2018. Based on the records reviewed, MM appears to be keeping track of usage rates, HAP contents and individual/aggregate HAP emissions.

EUWETCOAT

This emission unit consists of one conveyorized line of automatic robots with electrostatic and HVLP applicators used for the surface coating of plastic parts. The line consists of an aqueous wash line, drying oven, a prime coat spray booth, and an uncontrolled prime bake oven. Emissions from the prime coat spray booth are controlled via a capture system that leads to the Regenerative Thermal oxidizer (RTO) No. 2. Once the parts pass through this part of the process they then proceed through one base coat spray booth and one clear coat spray booth, each with recirculating air flow with a portion of return air exhausting to RTO No. 1, and a final uncontrolled bake oven. All three spray booths utilize a downdraft water wash particulate control.

This emission unit is subject to several emission limits for pollutants that are listed below.

- **Volatile Organic Compounds (VOCs) – This pollutant is subject to a limit of 130 tpy per a 12-month rolling time period. Records were requested and reviewed back to May 2018. For the month of May 2019, 7.83 tons of VOCs were emitted. As of May 2019, 89.96 tons of VOCs were emitted per a 12-month rolling time period which is within the permitted limit. Previous 12-month rolling time periods were reviewed and within the permitted limit.**

- **Acetone (CAS # 67-64-1) – This pollutant is subject to a limit of 13.6 tpy per a 12-month rolling time period. Records were requested and reviewed back to May 2018. For the month of May 2019, 329.87 lbs of acetone emissions were emitted. As of May 2019, 1.56 tpy of acetone was emitted per a 12-month rolling time period which is within the permitted limit. Previous 12-month rolling time periods were reviewed and within the permitted limit.**

- **Dibasic Ester (CAS # 95481-62-2) – This pollutant is subject to a limit of 3,390 pounds per year (ppy) per a 12-month rolling time period. This limit is for the prime coat spray booth and prime bake oven. Additionally, this emission rate is determined based on the sum of dimethyl glutarate, dimethyl succinate, and dimethyl adipate emissions. Records were requested and reviewed back to May 2018. For the month of May 2019, 5.66 lbs of dibasic ester emissions were emitted. As of May 2019, 138.14 lbs of dibasic ester emissions were emitted per a 12-month rolling time period which is within the permitted limit. Previous 12-month rolling time periods were reviewed and within the permitted limit.**

- **Dibasic Ester (CAS # 95481-62-2) – This pollutant is subject to a limit of 1,891 ppy per a 12-month rolling time period. This limit is for the base coat spray booth, clear coat spray booth, and final bake oven. Additionally, this emission rate is determined based on the sum of dimethyl glutarate, dimethyl succinate, and dimethyl adipate emissions. Records were requested and reviewed back**

to May 2018. For the month of May 2019, 109.22 lbs of dibasic ester emissions were emitted. As of May 2019, 1,150.61 lbs of dibasic ester emissions were emitted per a 12-month rolling time period which is within the permitted limit. Previous 12-month rolling time periods were reviewed and within the permitted limit.

- Cumene (CAS # 98-82-8) - This pollutant is subject to a limit of 3,258 ppy per a 12-month rolling time period. This limit is for the prime coat spray booth and prime bake oven. Records were requested and reviewed back to May 2018. For the month of May 2019, 15.638 lbs of cumene were emitted. As of May 2019, 179 lbs of cumene were emitted per a 12-month rolling time period which is within the permitted limit. Previous 12-month rolling time periods were reviewed and within the permitted limit.

- Cumene (CAS # 98-82-8) - This pollutant is subject to a limit of 3,587 ppy per a 12-month rolling time period. This limit is for the base coat spray booth, clear coat spray booth, and final bake oven. Records were requested and reviewed back to May 2018. For the month of May 2019, 16.768 lbs of cumene were emitted. As of May 2019, 182.6 lbs of cumene were emitted per a 12-month rolling time period which is within the permitted limit. Previous 12-month rolling time periods were reviewed and within the permitted limit.

- Ethylbenzene (CAS # 100-41-4) – This pollutant is subject to a limit of 9,986 ppy per a 12-month rolling time period. This limit is also for the prime coat spray booth and prime bake oven. Records were requested and reviewed back to May 2018. Negative numbers were observed on several of the months. After speaking with MM staff, it was determined that purge waste is from all three paint booths and so ethylbenzene usage is assumed to be divided evenly (33% each) between the three booths. However, actual usage for each booth may not necessarily be 33% each, which resulted in the negative values for the prime coat spray booth and prime bake oven emission limit. For the month of May 2019, 0.876 lbs of ethylbenzene were emitted. As of May 2019, 7.4 lbs of ethylbenzene were emitted, which is within the permitted limit. Previous 12-month rolling time periods of total ethylbenzene emissions reviewed were also within the permitted limit.

- Ethylbenzene (CAS # 100-41-4) – This pollutant is subject to a limit of 10,014 ppy per a 12-month rolling time period. This limit is also only for the base coat spray booth, clear coat spray booth and final bake oven. Records were requested and reviewed back to May 2018. For the month of May 2019, 46.867 lbs of ethylbenzene were emitted. As of May 2019, 618.9 lbs of ethylbenzene were emitted per a 12-month rolling time period which is within the permitted limit. Previous 12-month rolling time periods were reviewed and within the permitted limit.

The remaining emission limits for EUWETCOAT are listed below and were verified to be being met through the last testing of the destruction efficiency for RTO No.1 & No.2 in October / November 2011.

Pollutant	Limit	Time Period / Operating Scenario	Equipment
VOC and Acetone Combined	5.2 pound per hour (pph)	Test Protocol	EUWETCOAT Thermal Oxidizer No. 1 Outlet
Formaldehyde (CAS # 50-00-0)	1.37 pph	Test Protocol	EUWETCOAT
Basecoat Uncontrolled Total Formaldehyde Content	0.63 percent by weight	Test Protocol	EUWETCOAT
Clearcoat Uncontrolled Total Formaldehyde Content	0.39 percent by weight	Test Protocol	EUWETCOAT
Primer Uncontrolled Total Formaldehyde Content	0.70 percent by weight	Test Protocol	EUWETCOAT
Dibasic Ester* (CAS # 95481-62-2)	0.78 pph	Test Protocol	EUWETCOAT
Cumene (CAS # 98-82-8)	0.40 pph	Test Protocol	EUWETCOAT

Ethyl Benzene	2.96 pph	Test Protocol	EUWETCOAT

* = Dibasic Ester emission rate shall be determined based on the sum of dimethyl glutarate, dimethyl succinate, and dimethyl adipate emissions.

EUWETCOAT is subject to several material limit usage rates for melamine containing materials as well as content limits for melamine resin and free formaldehyde. Records were requested and reviewed for each applicable limit back to May 2018. Additional information for each limit is discussed below.

- For the primer containing melamine resin, EUWETCOAT is subject to a material limit of 46,043 gallons per year based on a 12-month rolling time period. Additionally, primer materials are limited to a maximum melamine resin content of 34.15 percent weight and a maximum free formaldehyde content of 0.1 percent weight. For the month of May 2019, 3,367.2 gallons of primer containing melamine resin were used. As of May 2019, 33,797 gallons of primer containing melamine resin were used per a 12-month rolling time period which is within the permitted limit. Previous 12-month rolling time periods reviewed were also within the permitted limit. Records reviewed showed that materials used were within the permitted melamine resin and free formaldehyde content limits. After further review, MM appears to be in compliance with applicable limits and is keeping track of monthly/12-month rolling total usages and melamine resin / free formaldehyde contents.
- For the basecoat containing melamine resin, EUWETCOAT is subject to a material limit of 53,296 gallons per year based on a 12-month rolling time period. Additionally, basecoat materials are limited to a maximum melamine resin content of 30.00 percent weight and a maximum free formaldehyde content of 0.1 percent weight. For the month of May 2019, 4,144.3 gallons of basecoat containing melamine resin were used. As of May 2019, 45,924 gallons of basecoat containing melamine resin were used per a 12-month rolling time period. Previous 12-month rolling time periods reviewed were also within the permitted limit. Upon reviewing of basecoat materials used containing melamine resin, several materials were noted with contents over the permitted limit of 30.00 percent weight for several months. This was brought to the attention of MM staff. After looking further into the potential issue, responses for each suspected material and supporting documentation were provided verifying that no emission exceedances had occurred. The responses for each material were reviewed and determined to be acceptable. After further review, MM appears to be in compliance with applicable limits and is keeping track of monthly / 12-month rolling total usages and melamine resin / free formaldehyde contents.
- For the clearcoat containing melamine resin, EUWETCOAT is subject to a material limit of 55,859 gallons per year based on a 12-month rolling time period. Additionally, basecoat materials are limited to a maximum melamine resin content of 16.78 weight percent and a maximum free formaldehyde content of 0.1 percent weight. For the month of May 2019, 3,399.1 gallons of clearcoat containing melamine resin were used. As of May 2019, 36,495 gallons of clearcoat containing melamine resin were used per a 12-month rolling time period. Previous 12-month rolling time periods reviewed were also within the permitted limit. Additionally, records reviewed showed that materials used were within the permitted melamine resin and free formaldehyde content limits. After further review, MM appears to be in compliance with applicable limits and is keeping track of monthly / 12-month rolling total usage and melamine resin / free formaldehyde contents.

During the inspection the three coating booths and both RTOs were observed in operation. The RTO No. 1 controls the prime booth operations and RTO No. 2 controls the base and clear coat operations. Emissions from EUWETCOAT and EUCLEANUP/PURGE are subject to Compliance Assurance Monitoring (CAM) and requirements are included in FGCAMPLAN of MI-ROP-N5056-2016.

Per SC.III.1-2, MM shall not operate any of the three coating lines unless RTO No. 1 and RTO No. 2 and the associated capture systems are operating in a satisfactory manner. Satisfactory manner is a minimum VOC destruction efficiency of 95% by weight across each RTO and overall VOC emissions capture efficiency for each paint booth to be 80 percent. As stated earlier in this report, the most recent testing done to verify the VOC destruction efficiency for each RTO was completed in November 2011. The test results indicated a destruction efficiency of 95% for RTO No. 1 and RTO No. 2. During the 2011 stack testing, smoke tube observations were conducted to verify a negative pressure for each spray booth. It was also determined in an email dated May 10, 2011 between AQD Permit Staff and AQD Technical Programs Unit Staff that an assumed 80% capture efficiency can be made if twice per shift a

smoke tube test is completed to verify a negative pressure for each booth. This is identified in their CAM Plan and MM completes smoke tube tests roughly every two hours of operation.

Both RTOs were equipped with a thermocouple in the combustion chamber to monitor the combustion chamber temperature and both were equipped with an LCD temperature monitor. To maintain satisfactory operation of RTO No. 1 and No. 2, a minimum temperature of 1400°F for the combustion chamber must be maintained. At the time of the inspection, the temperatures for RTO No. 1 and No. 2 were both in operation over the minimum temperature limit of 1400°F. Satisfactory operation of the capture systems for each spray booth is to maintain a negative pressure. Based on a review of the inspection records that day and speaking with MM staff it appears that the capture system was operating under a negative pressure the day of the inspection.

All three coating lines were observed during the site inspection. Each coating line consists of six robotic spray machines. A water wash control system was observed on each line and appeared to be operating properly. All robotic spraying machines utilize high volume low pressure (HVLP) spray technology and test caps were available for pressure testing.

EUWETCOAT is subject to an operating time limit of 8,000 hours per a 12-month rolling time period. As of May 2019, the 12-month rolling total of hours operated was 5,196 hours, which is within the permitted limit. Previous 12-month rolling time periods reviewed back to May 2018 were also within the permitted limit. Based on the records reviewed, MM is keeping adequate track of monthly and 12-month rolling time periods of hours of operation for EUWETCOAT.

Per SC.V.1, MM shall use Facility Mix Sheets supported by Manufacturers Specification Sheets to determine the VOC contents for all coatings, conductive prep solutions, reducer, cleanup and purge solvents. Facility mix sheets, manufacturers specification sheets and test method 24 results were provided for the top five materials used. Based on the records reviewed, it appears that overall MM is completing what is required.

Per SC.V.3, within five years of the issuance of MI-ROP-N5056-2016, testing of the destruction efficiency for RTO No. 1 and RTO No. 2 shall be conducted. This was discussed with MM staff and it was advised to complete the required testing sooner rather than waiting until the very end of the five years and potentially encountering issues that would stop testing from being done on time.

Per SC.VI.1, MM shall monitor and record the temperatures of the combustion chamber for each RTO. Records were requested for select months and provided. After further review and discussion with MM staff, MM appears to be keeping track of temperatures for each RTO and there appeared to be no issues from the records reviewed.

Based on the records provided, MM appears to be keeping track of VOC contents and densities of coatings, conductive prep solutions, diluents and/or reducers, daily usage rates and amounts of waste paint captured and disposed of per SC.VI.2

Based on the records provided, MM appears to be keeping track of usages, contents and monthly/12-month rolling time periods of emissions of dibasic ester, cumene and ethylbenzene containing materials per SC.VI.5.

Per SC.VII.4, MM shall notify the AQD if a change in land use occurs for property classified as industrial or as a public roadway, because this classification was relied upon to demonstrate compliance with Rule 225(1) for formaldehyde. Prior to the inspection MM had purchased the property located to the east of the site but outside the industrial park. The property was later annexed into the industrial park by the City of Newaygo. The purpose of this purchase was expanding the facility to prevent overcrowding. After speaking with AQD district and permit staff, it was concluded that this does not change the classification and would not require a notification.

Six stacks are listed in association with this flexible group. Though the exact dimensions were not measured, they appeared to be consistent with MI-ROP-N5056-2016.

A copy of the Malfunction Abatement Plan (MAP) dated October 4, 2018 was provided to AQD staff by MM. The MAP was submitted in 2018 after MM completed an annual review of the plan and made updates. After further review, it appears that overall MM is following the MAP.

EUCLEANUP/PURGE

This emission unit is for the use or purge and cleanup solvents in the paint kitchen, paint recirculation lines, paint booth line and applicator purge, and paint booth cleanup. The emissions released within each of the three paint spray booths associated with this EU are controlled by RTO No.1 and RTO No. 2.

This emission unit is subject to an hourly VOC emission limit of 11.25 pounds per hour (pph) based on a calendar month averaging time period. Additionally, EUCLEANUP/PURGE is subject to a VOC emission limit of 22.5 tpy per a 12-month rolling time period. Records were requested and reviewed since May 2018. For the month of May 2019, the daily VOC emissions average was 0.23 lbs/hr, which is within the permitted limit. Previous averages were reviewed and within the permitted limit. For the month of May 2019, 0.05 tons of VOCs were emitted, and as of May 2019, 0.85 tpy of VOCs were emitted per a 12-month rolling time period which is within the permitted limit. Previous 12-month rolling time periods were reviewed and appeared to be within the permitted limit. Based on the records reviewed, MM appears to be keeping track of daily and 12-month rolling total VOC emissions. Per SC.VI.1.b-c MM shall keep track of all cleanup and purge solvents used and reclaimed, if applicable. Records were requested and provided since May 2018. MM appears to be keeping track of all waste and purge solvents.

The Kitchen Mix area was observed during the inspection. Waste materials and VOC containing materials including coatings, reducers, solvents and thinners observed appeared to be properly stored in closed containers. Waste is shipped offsite for disposal. Additionally, while speaking with MM staff it was determined that test method 24 is completed for waste sent offsite to determine the appropriate reclaim values for VOC emissions. Testing was stated to be completed on a semiannual to annual basis and was concluded to be acceptable at this time. Gun box purge containers were observed for each automated robotic spray machine in each booth. Purging of the lines is completed after each coating change. Emissions from the purge materials are controlled by RTO No. 1 or RTO No. 2 depending on the applicable booth. Two stacks are listed in associated with this emission group. Though the exact dimensions were not measured, they appeared to be consistent with MI-ROP-N5056-2016. Based on the records requested and reviewed, MM appears to be following items of the MAP associated with EUCLEANUP/PURGE.

FGCAMPLAN

This flexible group is for the primecoat portion of EUWETCOAT that is controlled by RTO No. 2. The basecoat and clearcoat portion of EUWETCOAT are controlled by RTO No. 1. Emissions associated with EUCLEANUP/PURGE which are released within one of the three paint spray booths are also controlled by RTO No. 1 or No. 2. EUWETCOAT and EUCLEANUP/PURGE are subject to CAM.

The most recent CAM plan is the revised copy that was submitted and received by the AQD on March 2, 2016. The CAM plan is for the RTO and Capture System. Per the CAM plan an excursion will occur when the following happens:

- The combustion chamber for either RTO during operation drops below 1400°F.
- The Capture Systems are not in operation under a negative pressure.

Also, per the CAM plan, the RTO temperatures are continuously monitored and are recorded once per shift. It should be noted that the CAM plan states this only for RTO No. 1; however, this appears to be being completed for both RTOs. A smoke tube test is completed twice per shift to verify a negative pressure.

RTO temperatures are collected on a continuous basis and smoke tube tests are completed roughly every two hours during a shift. Select daily inspection reports were requested and reviewed back to May 2018. Based on the inspection reports reviewed, overall both RTO's and Capture Systems for each booth appeared to be operating satisfactorily per the CAM plan.

Various inspections for both RTOs and the Capture System are required in the CAM plan. Additionally, both RTOs are included in the MAP. Maintenance records were requested and provided back to May 2018. Based on the inspection records reviewed, it appears that overall appropriate maintenance is being completed for both RTOs and the Capture Systems.

Based on observations made and records received it appears that MM is in compliance with CAM rules and regulations for the RTOs and Capture Systems.

FGRULE287(c)

It was stated by MM staff that no units at the MM facility located in Newaygo, MI utilize the Rule 287(c) exemption from permitting at this time.

FGRULE290

It was stated by MM staff that no units at the MM facility located in Newaygo, MI utilize the Rule 290 exemption from permitting at this time.

FGCOLDCLEANERS

Five parts washers were observed during the inspection. There were two in a maintenance area, two in the paint mix shop and one in the general plant maintenance shop. Cold cleaners observed during the inspection had an air vapor interface area of less than 10 square feet and appear to be exempt per Rule 281(2)(h). The two cold cleaners located in the paint mix area had agitators located on the side. Additionally, labels were not observed on the two cold cleaners located in the paint mix shop. AQD staff AS advised MM staff to label the two cold cleaners. AQD staff AS and MM staff discussed at length the potential additional requirements for select cold cleaners and moving forward shall be completed appropriately.

Additional Observations

- Prior to the inspection, MM had announced the plans to install a 4,926,040 Btu/hr emergency generator onsite. The generator would be subject to New Source Performance Standards (NSPS) for Compression Ignition Engines and would appear to be exempt per Rule 282(2)(b)(i). During the opening discussion it was identified that the boiler was located on site in an exterior portion of the facility but not officially installed. The generator was later observed during the inspection.
- Approximately 68-72 plastic injection molding machines, ranging in size from 30 – 750 tons in size were observed on site. Additionally, 13 resin silos that can store 60,000 – 80,000 lbs of raw resin material were observed as well as a large number of dryers used to dry off resin material prior to being processed by the molding machines. All resin plastic injection molding machines, storage silos and dryers observed appear to be exempt per Rule 286(2)(b).
- Like the previous inspection on September 8, 2017, all racks used during the coating process are sent to be burned offsite and only plastic parts are processed onsite.
- The wastewater treatment system was observed and discussed with MM staff. The entire wastewater treatment system consists of 30,000 gallons. The system is drained twice a year by staff, fresh water pumped into the system, and waste collected is considered nonhazardous waste that is sent offsite for removal.
- One 4.184 MMBtu/hr boiler that was installed in 1992 and one 5.021 MMBtu/hr boiler that was installed in 1994 were observed during the site inspection. Both boilers are natural gas fired and appear to be exempt per Rule 282(2)(b)(i). Additionally, based on the size of the two boilers they are not subject to New Source Performance Standards (NSPS) Subpart Dc.
- A maintenance area was observed with several pieces of equipment such as a drill press that appear to be exempt per Rule 285(2)(l)(vi)(B).
- An oil storage area was observed on site.

Conclusion

Based on the facility walkthrough, observations made, and records received, MM appears to be in compliance with MI-ROP-N5056-2016 and applicable air quality rules.

NAME Adam J. Shaffer DATE 09/30/19 SUPERVISOR