

DEPARTMENT OF ENVIRONMENTAL QUALITY  
AIR QUALITY DIVISION

**FCE Summary Report**

Facility : Pilkington-NSG North America, Inc.	SRN : N6364
Location : 2121 W CHICAGO RD Suite E	District : Kalamazoo
	County : BERRIEN
City : NILES                      State: MI   Zip Code : 49120	Compliance Status : Compliance
Source Class : SM OPT OUT	Staff : Matthew Deskins
FCE Begin Date : 2/28/2018	FCE Completion Date : 2/28/2019
Comments :	

**List of Partial Compliance Evaluations :**

Activity Date	Activity Type	Compliance Status	Comments
02/21/2019	Scheduled Inspection	Compliance	Unannounced Scheduled Inspection

Name: Matt Deskins

Date: 3-6-19

Supervisor: RIL 3/7/19

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

N636448030

FACILITY: Pilkington-NSG North America, Inc.		SRN / ID: N6364
LOCATION: 2121 W CHICAGO RD, NILES		DISTRICT: Kalamazoo
CITY: NILES		COUNTY: BERRIEN
CONTACT: Peter Carpenter , Plant Manager		ACTIVITY DATE: 02/21/2019
STAFF: Matthew Deskins	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: Unannounced Scheduled Inspection		
RESOLVED COMPLAINTS:		

On February 21, 2019 AQD staff (Matt Deskins) went to conduct an un-announced scheduled inspection of the Pilkington North America (N6364) facility located in Niles, Berrien County. The purpose of the inspection was to determine the facilities compliance with Permit No. 570-96A (Opt-Out) and any other state and/or federal air regulations that may be applicable. The facility had also had a Consent Order (No. 10-2005) that was to be in effect for one year, but staff could not find any letters in the district file of it being terminated still. Staff will follow up with the facility about this again. Staff departed for the facility after inspecting another facility nearby and having lunch.

Staff arrived at the facility at approximately 12:55 p.m. Staff went into the glass enclosed entrance area where there is a sign in sheet, company policies, and a phone along with a facility contact list. Staff first tried the EH&S phone number but no one answered. Staff then tried the Plant Manager phone number which was answered by Pete Carpenter. Staff mentioned to Pete who they were and the purpose of the visit. Staff then asked if Eric Quinn was available. Eric had been the EH&S Manager and was whom staff had met with on previous inspections. Pete mentioned that Eric had resigned a couple of months prior and that he would be out shortly to meet with staff.

A few minutes later Pete came to let staff into the office area where staff introduced them self again. Pete then led staff to a conference room where he introduced staff to Pamela Rygalski (Regional Environmental Manager) and Tami Vasta (Plant Nurse). Staff then gave each one a business card and stated the purpose of the visit and what the inspection would entail. Pamela then mentioned that she was presently at the facility trying to get caught up on all the records. Staff was told that since Eric resigned that Pamela, Pete, and Tami were trying to make sure all compliance requirements are being met. Pamela then mentioned that she had to be on a conference call at 1:30 p.m. and wondered if there was anything she could assist staff with before then.

Staff then looked over the various permit conditions and mentioned that they would need to see records for the various VOC emission requirements as well as the various HAP requirements contained in Special Conditions #1 and #2 respectively. Pamela mentioned that she was currently getting caught up on the last few months of records. Staff then asked about the records for formulation data, VOC content, HAP content, etc. as required by Special Condition #3. She then showed staff where they track all of this information to meet condition #3 on a spreadsheet that they have on computer. Staff lastly mentioned about the status of the CO and that the district files didn't contain any information of it being terminated. Pamela said that she thought she remembered sending in a letter requesting that the CO be terminated after staff's last inspection. She then looked up some old e-mails and found where a letter had been drafted up to Lynn Fiedler back in 2015. Staff then asked if she could e-mail staff the emission records for conditions #1 and #2 as well as any information regarding the CO that she could find to him as soon as possible. She said that she would. Staff then thanked Pamela and Tami for their time. Staff then went to go on a tour of the facility with Pete. Prior to that tour though, staff wanted to aske Pete some general questions again about facility operations, so Pete then led staff back to his office. The following is a summary of staff's discussions with Pete, facility operations, and a review of the recordkeeping requirements.

According to Pete, Pilkington North America is still owned by Nipon Sheet Glass (NSG) and they currently employ approximately 338 people at the Niles facility. Pete said that business has been good and that they are still operating three shifts per day, five days per week, with some Saturdays if demand requires it. He said that 1<sup>st</sup> shift still 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. He said that their business still strictly revolves around automobile windows and sunroofs that they may add various components to (brackets, clips, etc.) 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. He said that their current customer base is Subaru, Nissan, Honda, Toyota, GM, and Chrysler for Tier 1 products (windshields, side windows, and back

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. Staff reviewed records for the 12-month rolling time period ending December 2018 and the highest daily VOC emissions were in April 2018 at 125 pounds and the highest yearly VOCs at 10.34 tons in June 2018.

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. 12-month rolling records reviewed by staff ending December 2018 indicate the highest HAP emissions for the time period were 4.96 tons in January 2018. The facility is also maintaining monthly emission records for individual HAPs and totals based on a 12-month rolling time period. Records reviewed for the previously mentioned 12-month rolling time period for individual HAP indicated Toluene is typically the HAP with the highest 12-month rolling amount at 3.3 tons.

SC #3: The facility is keeping records of the following as required and all the information is maintained on a computer spreadsheet: 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 and spray coating operations have been removed.

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

SC #9: The facility stores all waste in sealed 55-gallon containers. They are still 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 the products they use which is allowed.

**Inspection Summary:** Overall the facility appears to be in COMPLIANCE with its recordkeeping requirements contained in Permit No. 570-96A. The 3 light assembly cells installed under the AQD Rule 287(c) permit exemption appear to be meeting the exemption requirements. According to store keeper records in the mixing room, the facility uses approximately 1.5 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. Also, after further follow-up, the facility had sent a request to the AQD to terminate the CO and it had been approved. For whatever reason, the AQD district office either never received a copy of it or it was lost somehow. A copy of the approval has been obtained and will be added to the file.

NAME Matt Derbin

DATE 3-6-19

SUPERVISOR RIL 3/7/19