



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
LANSING DISTRICT OFFICE



C. HEIDI GREYER
DIRECTOR

October 4, 2016

Mr. Gerry Mazzola, General Manager
Magna DexSys
5589 West Mount Hope Highway
Lansing, Michigan 48917

SRN: P0429, Eaton County

Dear Mr. Mazzola:

VIOLATION NOTICE

On August 30, 2016, the Department of Environmental Quality (DEQ), Air Quality Division (AQD) conducted an inspection of Magna DexSys (DexSys) located at 5589 West Mount Hope Highway, Lansing. The purpose of this inspection was to determine DexSys' compliance with the requirements of the federal Clean Air Act; Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451); the Air Pollution Control Rules; and the conditions of Permit to Install (PTI) number 38-13D.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
FG-MACT-PPPP	PTI No. 38-13D: Special Condition III.1 and Special Condition III.4. (40 CFR 63.4492(b), and 40 CFR 63.4500(a)(2)(ii))	Continuous pressure drop records for May - August 2016 for the Tack-Off/Clean room portion of the enclosure intermittently out of compliance with the -0.007 in. H ₂ O pressure drop for multiple 3-hour block averages.
FG-MACT-PPPP	PTI No. 38-13D: Special Condition I.1, Special Condition I.5, and Special Condition VI.7. (40 CFR 63.4490(a)(1), 40 CFR 63.4500(a)(2)(i), and 40 CFR 63.4563(c)(2))	The 12-month rolling emission limit of 0.16 lb. HAP/lb. coating solids was exceeded September 2015 - August 2016.

As specified in 40 CFR 63.4563(c)(2), if an operating parameter deviates from the operating limit specified in Table 1 of 40 CFR 63 Subpart PPPP, zero control efficiency for the emission capture system and add-on control device must be assumed during the period of the deviation. During the inspection, DexSys provided continuous pressure differential records for both ends of the enclosure from May 2016 - July 2016 (previous to this time period, no records were kept and the violation was addressed in the July 26, 2016 violation notice). According to these records, the pressure drop intermittently deviated from the required minimum -0.007 in. H₂O for the Tack-Off/Clean room portion of the enclosure. For the multiple 3-hour averages when the minimum - 0.007 in. H₂O was not being met, it must be assumed that the add-on control device was achieving zero control efficiency.

As a result of not claiming control credit, the emission limit of 0.16 lb. HAP/lb. coating solids for new general use coatings, specified in 40 CFR 63.4490(a)(1) and PTI No. 38-13D, Section I, Special Condition 1, of FG-MACT-PPPP, has been exceeded. Based on the pressure drop records submitted for May - July 2016, the 12-month rolling emissions (August 2015 - July 2016) is 0.52 lb. HAP/lb. coating solids, assuming 0% control credit for that period of time. This emission limit exceedance constitutes a violation of 40 CFR Part 63 Subpart PPPP and PTI No. 38-13D.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by October 25, 2016. The written response should include: the dates the violations occurred; an explanation of the causes and duration of the violations; whether the violations are ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violations and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

As part of DexSys' response to this violation notice, please include the May - July 2016, data reduced to 3-hour averages and provide a recalculated monthly and 12-month rolling HAP lb./lb. coating solids emissions, taking into account 0% control credit for those 3-hour averages where the pressure differential operating limit was not met.

If DexSys believes the above observations or statements are inaccurate or do not constitute violations of the applicable legal requirements cited, please provide appropriate factual information to explain your position.

Thank you for your attention to resolving the violations cited above and for the cooperation that was extended to me during my inspection of DexSys. If you have any questions regarding the violations or the actions necessary to bring this facility into compliance, please contact me at the telephone number listed below.

Sincerely,



Michelle Luplow
Environmental Quality Analyst
Air Quality Division
517-284-6636

ML:TG

cc/via e-mail: Ms. Lynn Fiedler, DEQ
Ms. Mary Ann Dolehanty, DEQ
Mr. Christopher Ethridge, DEQ
Mr. Thomas Hess, DEQ
Mr. Brad Myott, DEQ