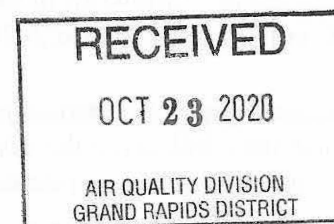


October 23, 2020

***Via E-mail***

Mr. Chris Robinson  
EGLE – AQD  
Grand Rapids District Office  
State Office Building, 6<sup>th</sup> Floor  
350 Ottawa Avenue, NW, Unit 10  
Grand Rapids, Michigan 49503-2341  
[robinsonc17@michigan.gov](mailto:robinsonc17@michigan.gov)



Re: Response to 10/5/2020 Violation Notice  
Magna Mirrors (Holland); SRN: N1781  
PTI No. 188-04G

Dear Mr. Robinson,

This letter responds to the October 5, 2020 Violation Notice (“VN”) issued to Magna Mirrors in Holland (“Magna”). As you know, the VN alleged an exceedance of the 90 ton/year VOC limit in FG-FACILITY Special Condition I.3 between November 2018 and March 2020, with a maximum 12-month figure of 96.6 ton/year.

Magna notes that it: (1) discovered the VOC recordkeeping issue through a self-audit in February 2020; (2) corrected past VOC records and reported the potential excess emissions to AQD in March; and (3) upgraded the relevant recordkeeping practices in addition to instituting other VOC-reducing improvements. As a result, the facility returned to sustainable compliance months ago.

Issue Identification

Magna first identified a VOC recordkeeping issue during an environmental self-audit in February 2020. In particular, some pre-saturated isopropyl alcohol (“IPA”) wipes that were potentially used at the facility were not included as VOC emissions from cleaning compounds. Upon discovery of this issue, Magna’s corporate and facility personnel worked together to correct this oversight and make related improvements to ensure future compliance. For example, EHS personnel worked with accounting, operations, and maintenance personnel to better document the purchasing history and usage of all relevant wipes to correlate with potential facility use.

By looking back at past purchasing records and making some conservative assumptions about wipe usage (e.g., that all wipes purchased were used onsite and that all VOCs were emitted to the atmosphere), Magna revisited its past VOC emission records. Based on the revised data, Magna concluded that the additional emissions from these extra IPA wipes, using these assumptions, may have resulted in an exceedance of the facility-wide 90 ton/year VOC emission limit at FG-FACILITY Special Condition I.3. That said, Magna also determined that the facility-wide VOC emissions remained below the 100 ton/year “major source” threshold.

Magna’s Response

On March 13, 2020, Magna e-mailed Ms. April Lazzaro, the facility’s AQD contact over the past several years, to report this issue. In the e-mail, Magna identified some potential VOC emissions reporting issues. Magna also sought a meeting with Ms. Lazzaro to discuss how best to proceed.

About this same time, however, the onset of the COVID-19 pandemic began to interrupt normal operations across the state, country, and world. The pandemic's interference with Magna's and AQD's operations, along with changes in AQD District staff's site responsibilities, presumably explain why the parties did not follow-up in the months that followed. That said, Magna conservatively reported the VOC emissions in March 2020 for the 2019 MAERs report.

#### Implementation of Improvements

Immediately following the discovery of this issue, Magna conducted a thorough review of all processes and internal procedures related to VOC emissions and various improvements were made, including:

- Additional recordkeeping to ensure that potential uses of IPA wipes are included in the VOC emission reporting for each month.
- Implementation of additional controls limiting the dispensing of IPA wipes for only approved processes.
- Restricting access to IPA wipes to authorized personnel.
- Additional training of EHS, maintenance, and operations personnel to ensure proper use and documentation of IPA wipes going forward.

Although the suspension of operations due to COVID-19 provided an immediate short-term reduction to the monthly and annual VOC emissions, the effect of these improvements has resulted in systemic and sustainable reductions to VOC emissions. Thus, even without additional reductions, Magna's actions have resulted in improved monitoring and recordkeeping for a lower-emitting operation that can sustainably comply with the 90 ton/year limit.

#### Conclusion

Overall, Magna acted swiftly and responsibly to address the issue. Under these circumstances, Magna believes that it appropriately addressed the deviation and therefore respectfully requests that AQD take no further enforcement action regarding this issue. On the other hand, please do not hesitate to contact me at 616-786-7651 or [andy.garceau@magna.com](mailto:andy.garceau@magna.com) with any questions.

Sincerely,



Andy Garceau  
Sr. Environmental, Health and Safety Supervisor  
Magna Mirrors – Holland

cc:

Ms. Jenine Camilleri, EGLE  
Mr. Christopher Ethridge, EGLE  
Ms. Heidi Hollenbach, EGLE  
Mr. Paul Cannizzo, General Manager – Magna Mirrors  
Mr. Tom Buckingham, General Manager – Engineered Glass Systems  
Ms. Samantha Philips, EHS – Engineered Glass Systems  
Mr. Kevin Kammerer, Group Environmental Manager – Magna Exteriors