



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
GRAND RAPIDS DISTRICT OFFICE



C. HEIDI GRETHOR
DIRECTOR

September 23, 2016

Mr. Brad Hilton
Magna Mirrors
3575 128th Avenue
Holland, Michigan 49424

SRN: N1781, Ottawa County

Dear Mr. Hilton:

VIOLATION NOTICE

On August 9, 2016, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of Magna Mirrors located at 3575 128th Avenue, Holland, Michigan. The purpose of this inspection was to determine Magna Mirrors 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 188-04D.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
EU-SILVERLINE	Rule 201	Failure to obtain Permit to Install
EU-SILVERLINE	PTI No. 188-04D, Special Condition (SC) VI.2	Failure to maintain required records
EU-SILVERLINE	PTI No. 188-04D, SC VI.4.c-e	Failure to maintain required records
FG-BONDING	PTI No. 188-04D, SC VI.2	Failure to maintain required records

During the recordkeeping review, AQD staff noted that the facility had changed coatings on EU-SILVERLINE without determining whether or not a meaningful change had occurred. After allowing the facility to create and submit the Rule 285(b) supporting documentation, an error was discovered and it was determined that the coating change requires a Permit to Install.

Additionally, the facility must maintain records with updated chemical composition listings to ensure accurate emission reporting.

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Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by October 14, 2016 (which coincides with 21 calendar days from the date of this letter). 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.

If Magna Mirrors 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 Magna Mirrors. If you have any questions regarding the violations or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,

A handwritten signature in black ink, appearing to read 'April Lazzaro', written in a cursive style.

April Lazzaro
Senior Environmental Quality Analyst
Air Quality Division
616-356-0248

cc: Ms. Heidi Hollenbach, DEQ
cc/via e-mail: Mr. Andy Garceau, Magna Mirrors
Mr. Ethan Meyer, Magna Mirrors
Ms. Lynn Fiedler, DEQ
Ms. Mary Ann Dolehanty, DEQ
Mr. Chris Ethridge, DEQ
Mr. Thomas Hess, DEQ