



GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF
ENVIRONMENT, GREAT LAKES, AND ENERGY
GRAND RAPIDS DISTRICT OFFICE



LIESL EICHLER CLARK
DIRECTOR

October 5, 2020

Mr. Andy Garceau
Magna Mirrors Corporation
3575 128th Avenue
Holland, Michigan 49423

SRN: N1781, Ottawa County

Dear Mr. Garceau:

VIOLATION NOTICE

On September 21, 2020, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted a records review of Magna Mirrors Corporation (Magna Mirrors) located at 3575 128th Avenue, Holland, Michigan. An onsite inspection was conducted on September 28, 2020. The purpose of these inspection activities 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) numbers 188-04G and 184-19.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
Source-Wide Emissions	PTI No. 188-04G, FG-FACILITY, Special Condition (SC) I.3	Exceeded VOC emission limit of 90 tpy from November 2018 through March 2020.

The records provided by Magna Mirrors demonstrate that actual emissions of Volatile Organic Compounds (VOCs) from the entire source exceeded 90 tons per year (tpy) on a 12-month rolling time period from November 2018 through March 2020, with maximum emissions of 96.63 tons in September 2019 and minimum emissions of 91.47 tons in November 2018. The conditions of PTI number 188-04G, FG-FACILITY, SC I.3 limit source-wide emissions of VOCs to less than 90 tpy.

Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by October 26, 2020 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the violation occurred; an explanation of the causes and duration of the violation; whether the violation is ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violation and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

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Please submit the written response regarding the violation to EGLE, AQD, Grand Rapids District, at 350 Ottawa Avenue NW, Unit 10, Grand Rapids, Michigan 49503 and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

In addition, certain processes and process equipment may be exempt from obtaining a PTI. Rule 278 establishes requirements of eligibility for exemptions listed in Rules 280 through 291. To be eligible for a listed exemption, the owner or operator of an exempt process or exempt process equipment must be able to provide information demonstrating the applicability of the exemption. Pursuant to Rule 278(a), this demonstration should be provided within 30 days of a written request by the AQD and should include the following information:

- A description of the exempt process or process equipment, including the date of installation.
- The specific exemption being used by the process or process equipment.
- An analysis demonstrating that Rule 278 does not apply to the process or process equipment.

The AQD requests that Magna Mirrors demonstrate that the emission units not covered in Permit to Install (PTI) Nos. 188-04G and 184-19 are exempt from the requirements of Rule 201 or submit a PTI application for the subject processes at the facility. Please submit a written response regarding this to the AQD by November 4, 2020.

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 violation cited above and for the cooperation that was extended to me during my inspection of Magna Mirrors Corporation. If you have any questions regarding the violation or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,

Chris Robinson

Chris Robinson
Environmental Quality Analyst
Air Quality Division
616-286-0083

cc: Ms. Mary Ann Dolehanty, EGLE
Dr. Eduardo Olaguer, EGLE
Ms. Jenine Camilleri, EGLE
Mr. Christopher Ethridge, EGLE
Ms. Heidi Hollenbach, EGLE