DEPARTMENT OF ENVIRONMENTAL QUALITY AIR QUALITY DIVISION

ACTIVITY REPORT: Scheduled Inspection

FACILITY: Magna Mirrors		SRN / ID: B2751
LOCATION: 414 E 40TH ST, HOLLAND		DISTRICT: Kalamazoo
CITY: HOLLAND		COUNTY: ALLEGAN
CONTACT: Adam Shepherd , Consultant		ACTIVITY DATE: 02/03/2015
STAFF: Dale Turton	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: Inspection		
RESOLVED COMPLAINTS:		1

Staff conducted an unannounced inspection of this facility. At this time there is not a person at the facility handling environmental issues. After eventually getting connected with John Speck, a facilities engineer at the plant, he was able to reach to local consultant that handles the environmental program for the company. Adam Shepherd was a former employee at this facility and now is employed at EH&S Consulting LLC. He was able to drive over to the facility and meet with John and myself and assist in the inspection.

The company operates without any permits. All of the individual operations at the facility operate under permit exemptions. This building formerly housed Optera. Magna has taken over the operation and manufactures similar products, mostly automotive type mirrors. The thermal oxidizer and some of the operations that used to be controlled by it have been removed.

Coaters

There are four vacuum coaters at the facility. All are permit exempt using Rule 290.

The Phoenix coater is located in a clean room. There is a minimal amount of particulate emitted from the vacuum metalizing, which is controlled by a filter prior to being exhausted. There is an IPA washer that accounts for some VOC emissions.

The System 6 coater is located in a clean room. There is a minimal amount of particulate emitted from the vacuum metalizing, which is controlled by a filter prior to being exhausted. There is no IPA washing, therefore no VOC emissions.

The Prospect coater and the FHR coater are both located in the same clean room. There is a minimal amount of particulate emitted from the vacuum metalizing, which is controlled by a filter prior to being exhausted. The same IPA washer is shared by both, resulting in VOC emissions.

Cold Cleaner

A small cleaner is in the maintenance area. It is used very little. Mineral spirits solvent is used. The lid is kept closed as required. Operating procedures are posted on the lid. It is in compliance with R707.

Fill & Plug

After the space between two layers is filled with liquid, the fill hole on one end of a rear view mirror is plugged with a glue material. There is some acetone and VOC emitted from the operation. This is permit exempt using Rule 290.

Chillers

A small amount of ethylene glycol is emitted in the process of chilling the coaters.

Misc. facility-wide solvent usage

Mineral spirits and IPA are used at various places throughout the facility, such as in the glass cutting area and the assembly area. This process is permit exempt using Rule 290.

Glass Cleaning

A Windex like glass cleaner containing 14 percent by weight of butoxyethanol is used at the facility. This is permit exempt using Rule 290.

Boilers

The two old boilers have just recently been removed from the plant. They have just been replaced with two smaller "Fulton" gas-fired boilers. These are "Vantage" model VTG-4000 condensing boilers with Maxon burners. The boilers are both rated at 4 MMbtu/hr. Natural gas usage records and the resulting emissions calculations are being kept. Both new boilers are exempt from needing a permit due to Rule 282(b)(i).

The company is tracking plant-wide material usage and calculating the overall VOC and HAP's emissions. They are below all off the applicable thresholds that would cause them to be a major source. VOC emissions for 2013 were about 15.5 tons of VOC and 0.5 tons HAPS. Monthly usage at each emission unit in the plant was below 1000 pounds per month (Rule 290 exemption threshold). Material usage is tracked by looking at the purchases at the corporate level, and how much of what material was shipped to the 40th street facility. Emissions are calculated and reported on a spreadsheet, breaking it down for each emission unit.

NAME Jale Juston

DATE Feb. 9, 2015 SUPERVISOR MB 2/9/2015