DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: Off-site Inspection

N505656368

FACILITY: Magna Mirrors North America		**SRN / ID:** N5056
LOCATION: 700 South Industrial Drive, NEWAYGO		**DISTRICT:** Grand Rapids
CITY: NEWAYGO		**COUNTY:** NEWAYGO
CONTACT: Brandon Doom , Environmental Health and Safety Specialist		**ACTIVITY DATE:** 12/16/2020
STAFF: Adam Shaffer	**COMPLIANCE STATUS:** Compliance	**SOURCE CLASS:** MAJOR
SUBJECT: Full Compliance Evaluation - Records request (11/13/2020) -Virtual inspection (12/16/2020)		
RESOLVED COMPLAINTS:		

An offsite inspection and records review was conducted by Air Quality Division (AQD) staff Adam Shaffer (AS) for Magna Mirrors North America (MM). Applicable records were requested on November 13, 2020, to verify compliance with Renewable Operating Permit (ROP) No. MI-ROP-N5056-2016. A virtual site inspection to verify onsite compliance was later completed on December 16, 2020. This inspection was conducted virtually for additional safety precautions necessary due to the Covid-19 pandemic.

Facility Description

MM manufactures and coats plastic automotive parts ranging from automobile mirrors to door handles. All parts manufactured and coated on site are plastic, though MM is permitted to coat metal automotive parts. The facility is a major source of volatile organic compounds (VOCs) and is in operation with Renewable Operating Permit (ROP) No. MI-ROP-N5056-2016.

Offsite Compliance Review

- MM is required to submit semi-annual and annual compliance reports per Part A General Conditions 19-23 of MI-ROP-N5056 -2016. Semi-annual compliance reports were reviewed since the previous inspection on 07/10/2019. In the most recent semi-annual compliance report received, two deviations were noted that were for failure to complete monthly inspections (April and May 2020) of both regenerative thermal oxidizers (RTO's) due to the coronavirus pandemic when the plant was shut down and the units were not operating. It was noted that monthly inspections resumed in June 2020 when production started back up. After further review, no further action is necessary regarding these two deviations at this time. Additionally, several corrected compliance reports were submitted in October 2019.
- Based on the timing of the inspection, the 2019 Michigan Air Emissions Reporting System (MAERS) Report had already been received and processed by the AQD. Upon review of the 2019 MAERS Report, several warnings were noted for stacks reported and were described as horizontal reference datum codes not entered. Notable changes were noted from the previous years reported values. Supporting documentation was provided. The emissions reported appear similar to what was identified in the records provided by the facility.

Records Compliance Evaluation

A request was sent to Mr. Brandon Doom, EHS Specialist, of MM on November 13, 2020, for various records required by ROP No. MI -ROP-N5056-2016.

Virtual Inspection

Due to the ongoing coronavirus pandemic, the intent to complete a virtual inspection of the facility instead of an in-person inspection was announced to MM staff on December 9, 2020. A "test drive" was completed on December 14, 2020, to verify that visual technology for the virtual inspection could be used with no major issues. The virtual inspection of the facility was started at 10:00am on December 16, 2020. Mr. Brandon Doom, EHS Specialist, provided the virtual inspection of the facility, and answered questions. Additionally, several MM staff accompanied Mr. Doom during the virtual inspection and helped answer site specific questions.

MI-ROP-N5056-2016

Source-Wide Conditions

This section applies to all process equipment at the stationary source including equipment covered by other permits, grandfathered equipment, and exempt equipment.

The source has a site wide emission limit for each hazardous air pollutant (HAP) of less than 10.0 tons per year (tpy) per a 12-month rolling time period, and an aggregate HAP emission limit of less than 25 tpy per a 12-month rolling time period. Records were requested and reviewed back through October 2019. For the month of September 2020, 4.95 tpy of aggregate HAPs were emitted which is well within the permitted emission limit for both individual and aggregate HAPs. Previous 12-month rolling time periods were

reviewed and were also within the permitted limits. HAP emissions were separated out and based on records reviewed, the highest individual HAP emitted appears to be xylene.

Per Special Condition (SC) V.1 MM shall determine the HAP contents for all materials used from manufacturer's formulation data. Records were requested and provided. Upon review, potential errors were noted in documents provided, however, it is highly unlikely that any emission limits were exceeded based on current emissions. The potential errors will be discussed with the company moving forward. The records provided appeared to be acceptable.

Per SC VI.2.a-e, MM shall keep usage rates of each HAP containing material used, if applicable, reclaim of HAP materials, HAP contents, and individual / aggregate HAP monthly / 12-month rolling time period emissions. Records were requested and provided. Based on the records reviewed, MM overall appears to be keeping track of usages rates, reclaim, HAP contents and monthly / 12-month rolling time period individual / aggregate HAP emissions.

EUWETCOAT

This emission unit is for one conveyorized coating line with automatic robots with electrostatic and HVLP applicators used for the surface coating of automotive plastic and metal parts. The parts pass through an aqueous wash line, drying oven, a prime coat spray booth equipped with a separate Regenerative Thermal Oxidizer (RTO No. 2) control system and an uncontrolled prime bake oven. The parts pass next through one base coat spray booth and one clear coat spray booth, each with recirculating air flow with a portion of return air exhausting to RTO No. 1, and a final uncontrolled bake oven. All three spray booths utilize downdraft water wash particulate control.

Virtual Inspection Observations

During the virtual inspection, all three coating lines identified in EUWETCOAT were observed. Both RTOs were noted to be in operation. The RTO No. 2 controls the prime booth operations and RTO No. 1 controls the base and clear coat operations. Emissions from EUWETCOAT and EUCLEANUP/PURGE are subject to Compliance Assurance Monitoring (CAM) and requirements are included in FGCAMPLAN of MI-ROP-N5056-2016, which is discussed further in this report.

Per SC III.1-2, MM shall not operate any of the three coating lines unless RTO No.1 and RTO No. 2 and associated capture systems are operating in a satisfactory manner. Satisfactory manner is a minimum VOC destruction efficiency of 95% by weight across each RTO and overall VOC emissions capture efficiency for each paint booth of 80%. The most recent testing done to verify the VOC destruction efficiency for each RTO was completed in November 2011. The test results indicated a destruction efficiency of at least 95% for RTO No. 1 and RTO No. 2. During the 2011 stack testing, smoke tube observations were conducted to verify a negative pressure for each spray booth. It was also determined in an email dated May 10, 2011 between AQD Permit Staff and AQD Technical Programs Unit Staff that an 80% capture efficiency can be assumed if twice per shift a smoke tube test is completed to verify a negative pressure for each booth. This is identified in their CAM Plan and MM completes smoke tube tests roughly every two hours of operation.

A water wash control system is installed for each respective coating line and each appeared to be operating properly, though it was difficult to observe some areas of the water wash systems due to the visual technology. All robotic spraying machines were stated by MM staff to utilize electrostatic spraying technology. Since the facility no longer uses HVLP spray technology on their robotic spray machines, test caps are no longer necessary to be kept onsite.

Both RTOs are equipped with a thermocouple in the combustion chamber to monitor the temperature and an LCD temperature monitor. At the time of the inspection, the temperature of the combustion chamber for RTO No. 1 (Salem) was 1,485°F and the temperature for RTO No. 2 (Adwest) was 1,623°F which are within the permitted limits of at least 1,400°F during operation. Temperature and test tube records are discussed further in this report. At the end of the inspection, daily audit records for the day were reviewed and appeared acceptable.

Six stacks are listed as associated with this emission unit. Though the stacks were not observed at the time of the inspection it was verified by MM staff that no changes have occurred to the stacks since the last inspection and no issues were noted of the stacks during the 2019 inspection.

Records Review

EUWETCOAT is subject to several emission limits for pollutants that are listed below.

- Volatile Organic Compounds (VOCs) - This emission unit is subject to a limit of 130 tpy per a 12-month rolling time period. Records were requested and reviewed. For the month of September 2020, 7.0 tons of VOCs were emitted and as of

September 2020, 59.45 tpy of VOCs were emitted per a 12-month rolling time period which is well within the permitted limit. Previous 12-month rolling time periods were also reviewed and appeared to be within the permitted limit.

- Acetone (CAS # 67-64-1) - This emission unit is subject to a limit of 13.6 tpy per a 12-month rolling time period. Records were requested and reviewed. For the month of September 2020, 252.41 lbs of acetone was emitted. As of September 2020, 1.34 tpy of acetone was emitted, which is well within the permitted limit. Previous 12-month rolling time periods were reviewed and also appeared to be within the permitted limit.
- Dibasic Ester (CAS # 95481-62-2) – The prime coat spray booth and prime bake oven are subject to a limit of 3,390 pounds per year (ppy) per a 12-month rolling time period. Additionally, this emission rate is determined based on the sum of dimethyl glutarate, dimethyl succinate, and dimethyl adipate emissions. Records were requested and reviewed. For the month of September 2020, 6.33 lbs were emitted. As of September 2020, 67.51 ppy of emissions were reported which is well within the permitted limit. Previous ppy time periods reviewed were also within the permitted limit.
- Dibasic Ester (CAS # 95481-62-2) – The base coat spray booth, clear coat spray booth, and final bake oven are subject to a limit of 1,891 ppy per a 12-month rolling time period. Additionally, this emission rate is determined based on the sum of dimethyl glutarate, dimethyl succinate, and dimethyl adipate emissions. Records were requested and reviewed. For the month of September 2020, 61.54 lbs of emissions were emitted. As of September 2020, 615.56 lbs of emissions were emitted per a 12-month rolling time period which is well within the permitted limit. Previous 12-month rolling time periods were also well within the permitted limit.
- Cumene (CAS # 98-9-8208) – The prime coat spray booth and prime bake oven are subject to a limit of 3,258 ppy per a 12-month rolling time period. Records were requested and reviewed. For the month of September 2020, 13.306 lbs of cumene were emitted. As of September 2020, 91.7 lbs of cumene were emitted which is well within the permitted limit. Previous 12-month rolling time periods were also well within the permitted limit.
- Cumene (CAS # 98-82-8) – The base coat spray booth, clear coat spray booth, and final bake oven are subject to a limit of 3,587 ppy per a 12-month rolling time period. Records were requested and reviewed. For the month of September 2020, 13.849 lbs of cumene was emitted. As of September 2020, 115.4 lbs of cumene were emitted which is well within the permitted limit. Previous 12-month rolling time periods reviewed were also within the permitted limit.
- Ethylbenzene (CAS # 100-41-4) – The prime coat spray booth and prime bake oven are subject to a limit of 9,986 ppy per a 12-month rolling time period. Records were requested and reviewed. For the month of September 2020, 9.158 lbs of ethylbenzene were emitted. As of September 2020, 27.8 lbs of ethylbenzene were emitted which is well within the permitted limit. Previous 12-month rolling time periods reviewed were also within the permitted limit. During the 2019 inspection, it had been determined that purge waste is from all three booths with equal usage for each booth, therefore, ethylbenzene usage is assumed to be divided evenly (33% each) between the three booths. However, actual usage for each booth may not necessarily be 33% each, which may result in negative values for the emission records.
- Ethylbenzene (CAS # 100-41-4) – The base coat spray booth, clear coat spray booth and final bake oven are subject to a limit of 10,014 ppy per a 12-month rolling time period. Records were requested and reviewed. For the month of September 2020, 46.979 lbs of ethylbenzene emissions were emitted. As of September 2020, 413.0 lbs of ethylbenzene emissions were emitted per a 12-month rolling time period which is well within the permitted limit. Previous 12-month rolling time periods reviewed were also within the permitted limit.

The remaining emission limits for EUWETCOAT are listed below and were verified to be met through the last testing of the destruction efficiency for RTO No. 1 & RTO No. 2 in October / November 2011.

Pollutant	Limit	Time Period / Operating Scenario	Equipment
VOC and Acetone Combined	5.2 pound per hour (pph)	Test Protocol	EUWETCOAT Thermal Oxidizer No. 1 Outlet
Formaldehyde (CAS # 50-00-0)	1.37 pph	Test Protocol	EUWETCOAT
Basecoat Uncontrolled Total Formaldehyde Content	0.63 percent by weight	Test Protocol	EUWETCOAT
Clearcoat Uncontrolled Total Formaldehyde Content	0.39 percent by weight	Test Protocol	EUWETCOAT
Primer Uncontrolled Total Formaldehyde Content	0.70 percent by weight	Test Protocol	EUWETCOAT
Dibasic Ester* (CAS # 95481-62-2)	0.78 pph	Test Protocol	EUWETCOAT
Cumene (CAS # 98-82-8)	0.40 pph	Test Protocol	EUWETCOAT
Ethyl Benzene	2.96 pph	Test Protocol	EUWETCOAT

* = Dibasic Ester emission rate shall be determined based on the sum of dimethyl glutarate, dimethyl succinate, and dimethyl adipate emissions.

EUWETCOAT is subject to several material limit usage rates for melamine containing materials as well as content limits for melamine resin and free formaldehyde. Records were requested and provided. Additional information for each limit is discussed further below.

- For the primer containing melamine resin, EUWETCOAT is subject to a material limit of 46,043 gallons per year based on a 12-month rolling time period. Additionally, primer materials are limited to a maximum melamine resin content of 34.15 percent weight and a maximum free formaldehyde content of 0.1 percent weight. For the month of September 2020, 3,867.5 gallons of primer containing melamine were used. As of September 2020, 31,077 gallons of primer containing melamine were used which is within the permitted limit. Previous 12-month rolling time periods reviewed were also within the permitted limit. Melamine resin and free formaldehyde contents were reviewed in records provided. Based on the records provided, it appears that these limits are being met.
- For the basecoat containing melamine resin, EUWETCOAT is subject to a material limit of 53,296 gallons per year based on a 12-month rolling time period. Additionally, basecoat materials are limited to a maximum melamine resin content of 30.00 percent weight and a maximum free formaldehyde content of 0.1 percent weight. For the month of September 2020, 3,154.3 gallons of basecoat were used. As of September 2020, 31,994 gallons of basecoat were used per a 12-month rolling time period which is within the permitted limit. Previous 12-month rolling time periods reviewed were also within the permitted limit. Melamine resin and free formaldehyde contents were reviewed in records provided. Errors were noted on two coating materials and discussed with MM staff. Based on the responses received, MM appears to be meeting the applicable limits.
- For the clearcoat containing melamine resin, EUWETCOAT is subject to a material limit of 55,859 gallons per year based on a 12-month rolling time period. Additionally, the clearcoat materials are limited to a maximum melamine resin content of 16.78 weight percent and a maximum free formaldehyde content of 0.1 weight percent. For the month of September 2020, 2,670.7 gallons of clearcoat were used. As of September 2020, 23,665 gallons of clearcoat were used which is well within the permitted limit. Previous 12-month rolling time periods reviewed were also well within permitted limits. Melamine resin and free formaldehyde contents were reviewed in records provided. One coating material (Low Gloss Clear) was noted with a melamine resin content of 34% that was used. However, only 0.6 gallons were used for March 2020. The material was brought to the attention of MM staff and a follow up response was received. The response appeared acceptable and MM appears to be meeting the applicable limits for the coating materials.

EUWETCOAT is subject to an operational limit of no more than 8,000 hours per a 12-month rolling time period. Records were requested and reviewed back through October 2019. For the month of September 2020, EUWETCOAT was used for 406.5 hours. As of September 2020, EUWETCOAT was used for 4,208 hours which is well within the permitted limit. Previous 12-month rolling time periods reviewed were also within the permitted limit.

Per SC V.1-2, MM shall determine the VOC content using facility mix sheets supported by manufacturers specification sheets for all coatings, conductive prep solutions, reducer, cleanup, and purge solvents. Various documents were requested and provided for select materials. Upon review, the records provided did not appear to be the most current. After discussing this with the facility, additional documents were provided, however, the additional documents were dated for after the records request timeframe reviewed. During a discussion with MM staff, it appears that the VOC contents will vary per batch. After further review it was determined that MM appears to be keeping track of VOC contents.

Per SC V.3, within 5 years of the issuance of MI-ROP-N5056-2016, MM shall complete testing to verify the destruction efficiency of both RTO's. At this time, MM has not completed testing and it was advised to MM staff of the deadline and to complete the testing in a timely manner in case of potential issues encountered.

Per SC VI.1, MM shall monitor and record the temperatures in the combustion chambers for each RTO. Records were requested and provided for select time periods. During the 2011 VOC destruction efficiency testing for each RTO, the average RTO combustion chamber temperature for the RTO #1 was 1,531°F and for RTO #2 was 1,668°F. With these operational temperatures a destruction efficiency of approximately 97% was reached for each RTO. Upon review of the temperature records provided, there appeared to be no issues with meeting the required permitted operating temperature limit of 1,400°F, however, operating temperatures for each RTO were below the tested temperatures. This was mentioned to MM staff and discussed at length. Based on the records reviewed and how high the destruction efficiency during testing is above the required limit of 95%, it would appear that MM would potentially meet the minimum destruction efficiency, however, this cannot be verified. Retesting of each RTOs destruction efficiency is to be completed by June 16, 2021. Moving forward it was discussed with MM staff that for their next destruction efficiency test of both RTOs to make sure the test operation temperature of the combustion chamber would be the temperature used during routine operation.

Per SC VI.2a-f, MM shall keep track of VOC and acetone 12-month rolling time period emission rates, density and VOC contents of products, daily usage rates, hours of operation of EUWETCOAT and amount of waste captured and disposed of. Records were requested and provided for select time periods. Based on the records reviewed, MM appears to be maintaining applicable records.

Per SC VI.3a-d, MM shall keep track of destruction and capture efficiencies for each RTO and supporting documentation such as technical data sheets and facility mix sheets. After further review, records provided appear acceptable.

Per SC VI.4-5, MM shall keep track of coating free formaldehyde contents, coating melamine resin contents, usage rates of melamine resin for each coating line per a 12-month rolling time period, and the following for all dibasic ester, cumene, and ethyl benzene

materials (monthly and annual usages, contents, monthly emission and annual emission rates). Records were requested and provided. After further review, applicable records appear to be kept.

Per SC VII.4, MM shall notify the AQD if a change in land use occurs for property classification as industrial or a public roadway, because this classification was relied upon to demonstrate compliance with Rule 225(1) for formaldehyde. Speaking with MM staff, it appears that no land use changes have occurred since the last inspection.

Per SC IX.1, MM shall implement and maintain a Malfunction Abatement Plan (MAP) for EUWETCOAT. The most recent MAP dated October 4, 2018 was reviewed and select records requested. After further review of the records provided, it appears that overall MM is following the MAP.

EUCLEANUP/PURGE

This emission unit is for VOC emissions from the use of purge and cleanup solvents in the paint kitchen, paint recirculation lines, paint booth line and applicator purge, and paint booth cleanup. The emissions released within each of the three paint spray booths associated with this EU are controlled by RTO No.1 and RTO No. 2.

Virtual Inspection Observations

Due to potential safety concerns the Kitchen Mix area could not be accessed at the time of the virtual inspection. Photos were provided later that day of the Kitchen Mix area. The remaining components of EUCLEANUP/PURGE were observed during the inspection. The Kitchen Mix area is where all waste and VOC containing materials such as coatings, solvents, reducers, and thinners are stored. Waste material is shipped offsite for disposal. It was noted that MM calculates reclaim from waste shipped offsite by periodic testing of waste to determine appropriate reclaim values. Testing is completed on a semi-annual to annual basis and was determined to be acceptable. The most recent test results of reclaim (June 2020) were provided. Based on the observations made, MM appeared to be keeping materials properly stored in closed containers. Each robotic coating spray unit is equipped with a purge container. The gun tip is purged after each coating change and emissions were noted to be controlled by the applicable RTO. Two stacks are listed to be associated with this emission unit. The two stacks were not observed during the course of the virtual inspection, however, MM staff stated that no changes have occurred to the stacks since the last inspection in 2019 with no errors noted then at the time.

Records Review

This emission unit is subject to a VOC emission limit of 11.25 pounds per hour based on a monthly average. Records were requested and reviewed back through October 2019. Upon review, negative values were noted for several months. This was brought to the attention and discussed with MM staff. It was determined that MM uses a mass balance approach when computing emissions for EUCLEANUP/PURGE and it is assumed that equal amounts of purge solvents are used by the three booths. This may occasionally not occur thus resulting in a potential negative value. Other potential causes of the negative emissions were residual solvent left in the tank or timing of pickup of solvent waste materials. After further review of the records provided, negative emissions appear to not routinely occur and based on other months records, it is highly unlikely that MM has exceeded this hourly emission limit. Previous months reviewed were within the hourly emission limit. The records were determined to appear acceptable.

This emission unit is subject to a second VOC emission limit of 22.5 tpy per a 12-month rolling time period. Records were requested and reviewed back through October 2019. As stated above, for the month of September 2020, a negative value was recorded of emissions. As discussed above, this was determined to be acceptable at this time. As of September 2020, 1.80 tpy of emissions were reported per a 12-month rolling time period which is well within the permitted limit. Previous 12-month rolling time periods were also within the permitted limit.

A copy of the Material Safety Data Sheet was provided of the purge solvent used onsite and appears acceptable.

Per SC VI.1, MM shall keep track of the monthly cleanup / purge VOC emission rate in pounds per hour based on a calendar month averaging time period and tons per year based on a 12-month rolling time period as determined at the end of each month, the amount of gallons of cleanup and purge solvents used and if applicable reclaimed. Records were requested for select time periods and reviewed. Based on the records reviewed, it appears that applicable records are being kept.

FGCAMPLAN

This flexible group is for EUWETCOAT and EUCLEANUP/PURGE. The prime coat portion of EUWETCOAT is controlled by RTO No. 2. The basecoat and clearcoat portion of EUWETCOAT are controlled by RTO No. 1. Emissions associated with EUCLEANUP/PURGE which are released within each of the three paint spray booths are also controlled by RTO No. 1 and No. 2. EUWETCOAT and EUCLEANUP/PURGE are subject to CAM.

The most recent CAM Plan is the revised copy that was submitted and received by the AQD on March 2, 2016. When submitting the ROP renewal application in September 2020, MM stated that no changes have been made to the 2016 CAM Plan.

The CAM Plan is for each RTO and Capture System. Per the CAM Plan, an excursion will occur when the following happens:

- The combustion chamber for either RTO during operation falls below 1,400°F.
- The Capture Systems are not in operation under a negative pressure.

As stated previously, no recent excursions for the RTOs nor Capture Systems have been reported since the 2019 inspection. Additionally, MM is to report all monitoring downtime events of the RTOs or Capture Systems. Since the 2019 inspection, no monitoring downtime events have been reported.

Per the CAM Plan, the RTO temperatures are continuously monitored and recorded once per shift. A smoke tube test is completed twice per shift to verify a negative pressure for each capture system. RTO temperatures are collected on a continuous basis and smoke tube tests are completed roughly every two hours, with a minimum of at least twice a shift. Various inspection reports were requested and reviewed back for select time periods. Based on the records reviewed, MM appears to be in compliance with their CAM plan and requirements for the RTOs and Capture Systems.

FGRULE287(c)

It was stated by MM staff that no units at the MM facility located in Newaygo, MI utilize the Rule 287(c) exemption from permitting at this time.

FGRULE290

It was stated by MM staff that no units at the MM facility located in Newaygo, MI utilize the Rule 290 exemption from permitting at this time.

Additional Observations

- A 4,926,040 Btu/hr emergency generator that was installed in 2019 was attempted to be observed during the inspection, however, due to technical difficulties with the visual technology, the generator was only briefly observed at a distance. Following the inspection, the same day, several photographs were provided of the unit. The unit is only used for emergency purposes. An hour's meter is connected to the unit and read 62.5 hours the day of the inspection. MM staff stated that besides one electrical power outage, the generator has only been used to complete routine maintenance on the unit. MM staff stated that they keep monthly records of hours the generator was used and for what purpose. Since MM is an area source for HAPs, the emergency generator appears to be subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) Subpart ZZZZ – Reciprocating Internal Combustion Engines. However, the AQD is not delegated the authority by EPA for this NESHAP for area sources of HAPs, therefore, a compliance determination was not completed with regards to this particular NESHAP. The emergency generator appears to be subject to the New Source Performance Standards (NSPS) Subpart IIII – Standards of Performance for Stationary Compression Ignition Internal Combustion Engines. A Certificate of Conformity was previously provided by MM stating this unit falls under the Tier 3 exhaust emission compliance. Monthly hours of operation were provided for select time periods and reviewed. Based on the records provided, the emergency generator was used for three hours in October 2020 and it was noted that the unit was shut down between March 2020 and June 2020 due to the ongoing coronavirus pandemic. The unit appears to not have been used for non-emergency purposes and all remaining hours of operation were noted to be for maintenance / testing. Based on the monthly records of operation, MM appears to be operating the emergency generator within the 12-month rolling time period limit for hours of operation for maintenance / testing. A safety data sheet was provided of the diesel fuel used for the emergency generator which appears to be acceptable. Based on speaking with MM staff and reviewing the monthly hours of operation it appears that applicable maintenance is being completed for the unit. After further review, MM appears to be in compliance with NSPS Subpart IIII regulations. The company believes that the emergency generator is exempt per Rule 282(2)(b)(ii). After further review, this appears to be applicable.
- One parts washer was observed in a maintenance area. The unit appears to have an air vapor interface area of less than ten square feet, is labeled and was closed at the time of the inspection. The unit appears to be exempt per Rule 281(2)(h). Based on previous discussions with MM's consultant, this is the only parts washer onsite that does not use purge material from EUCLEANUP/PURGE.
- Approximately 65-70 plastic injection molding machines, ranging in size from 120 – 750 tons in size were observed during the virtual inspection. Additionally, 13 resin silos that store raw resin, and large numbers of dryers used to dry off resin material prior to being processed by the molding machines were noted. All resin plastic injection molding machines, storage solos and dryers noted appear to be exempt per Rule 286(2)(b).
- The wastewater treatment system was observed during the course of the inspection and appears to be exempt per Rule 285 (2)(m).

- Like the previous inspection, all racks used during the coating process are sent to be burned offsite and only plastic parts are processed onsite.
- Equipment observed in the maintenance area such as a drill press appear to be exempt per Rule 285(2)(l)(vi)(B).
- One 4.184 MMBtu/hr boiler that was installed in 1992 and one 5.021 MMBtu/hr boiler that was installed in 1994 were observed during the inspection. Both boilers are natural gas fired and appear to be exempt per Rule 282(2)(b)(i). Based on the size of the two boilers, they are not subject to New Source Performance Standards (NSPS) Subpart Dc. The smaller generator was last serviced on November 24, 2020, and the larger boiler was last serviced on March 18, 2019.
- The expansion that had been under operation during the last inspection had since then been completed and was observed during the inspection.

Conclusion

Based on the records received and a virtual walkthrough of the facility, MM appears to be in compliance with MI-ROP-N5056-2016 and applicable air quality rules.

NAME Adam Shaffer DATE 12/30/2020 SUPERVISOR HH