



DEQ-AQD LANSING D.O.

OCT 25 2016

DexSys (Delta Exterior Systems)

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October 25, 2016

Ms. Michelle Luplow  
Environmental Quality Analyst, Air Quality Division  
Michigan Department of Environmental Quality  
525 W. Allegan Street  
Lansing, MI 48909

RE: Notice of Violation

Dear Ms. Luplow:

On August 30, 2016, the Department of Environmental Quality (DEQ), Air Quality Division (AQD) conducted an inspection of Norplas Industries, Inc.'s DexSys division located in Lansing, Michigan ("DexSys") to determine DexSys' compliance with all applicable air regulations and permit requirements. As a result of the inspection, a Violation Notice was received by DexSys on October 4, 2016. The Notice of Violation requires a written response to two outstanding alleged noncompliance issues under the Federal Coating MACT, Subpart PPPP and the conditions of Permit to Install (PTI) number 38-13D.

1. The Violation Notice indicated that continuous pressure drop records from May through September 2016 in the tack-off/clean room portion of the PTE were intermittently out of compliance with the -0.007"wc pressure drop requirement for multiple 3-hour block averages.
  - A summary of deviations from May 2016 through September 2016 has been included as Attachment #1. This summary includes dates and duration of each event where monitoring records indicate that the tack-off/clean room pressure drop requirement was apparently not met. Please note that in each instance only the tack-off/clean room (NDO #1) showed deviation, the CC2 oven/plant (NDO #2) indicated that pressure drop requirements were met.
  - The deviations are believed to have been caused by booth grease interfering with or completely plugging the monitor's tubing in the tack-off/clean room NDO rather than an actual pressure drop. A third party Company is responsible for cleaning and reapplying booth grease to the walls in this area. They were not aware of the purpose nor the critical nature of the monitor tubing's opening. On September 27th, a vented steel housing was installed over the tubing opening to prevent contact with booth grease. Attachment #2 shows a photo of the tubing before and after this corrective action occurred.
  - Additionally an automated email alert has been setup that if the pressure differential deviates beyond the acceptable limit for 2 or more minutes it notifies all pertinent maintenance/management for response.
2. The Violation Notice indicated that the 12-month rolling emission limit of 0.16 lb. HAP/ lb. coating solids was exceeded from September 2015 to August 2016. As specified in 40 CFR 63.4563(c)(2), if an operating parameter deviates from the operating limit specified in Table 1 of

40 CFR 63 Subpart P, zero control efficiency for the emission capture system and add-on control device must be assumed during the period of the deviation.

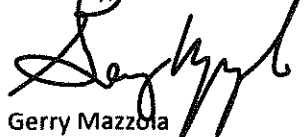
- As requested in the Violation Notice, monthly and 12-month rolling lb. HAP/lb. coating solids emissions have been recalculated using 0% credit for all months prior to May 2016 when pressure drop data was not captured and for all deviations between May 2016 and September 2016. This information has been included as Attachment #3. Please note that while DexSys acknowledges that the monitoring data indicates that the tack-off/clean room pressure drop requirement was not met, DexSys respectfully disputes that the capture and control systems actually failed.

As discussed above, DexSys believes that the monitoring data does not reflect the actual emissions capture due to interference from booth grease. Furthermore, the paint booths, filter houses, ovens and RTO that operate at DexSys have been operated as designed since the start-up of production in November 2014. The proper air balance of the entire system is critical so that the robotic application of coatings occurs without quality blemishes. DexSys has not observed any blemishes or production issues that would indicate that the system was not operating as designed. In addition, air balance flow readings have been monitored and documented within each booth once per shift. Air flow has been continuously monitored in the ductwork to the RTO. Successful stack testing and Method 204 testing in April 2015 confirmed that the system was meeting all capture and control requirements.

Based on the foregoing, DexSys respectfully maintains that the capture and control systems have been operating normally since the start-up of production despite monitoring records that would otherwise appear to indicate the tack-off/clean room pressure drop requirement was not met and hence that control technologies have been operating as designed with no HAPs emissions in excess of regulatory and permit limits.

Please feel free to contact John Krocker ([john.krocker@magna.com](mailto:john.krocker@magna.com), 517-999-1400), if you have any questions or would like to discuss these details further.

Sincerely,



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CC: Janet Haynes – Magna International  
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