



REGION 5

CHICAGO, IL 60604

MEMORANDUM

SUBJECT: CLEAN AIR ACT INSPECTION REPORT
Magna International, Lansing, Michigan

FROM: Justin Smith, Environmental Engineer
AECAB (IL/IN)

THRU: Nathan Frank, Section Supervisor
AECAB (IL/IN)

TO: File

BASIC INFORMATION

Facility Name: Magna International, Inc. - DexSys

Facility Location: 5589 West Mount Hope Highway, Lansing, Michigan 48917

Date of Inspection: May 16, 2024

EPA Inspector(s):

1. Justin Smith, Environmental Engineer
2. Ethan Chatfield, Environmental Engineer

Other Attendees:

1. Timothy Gibbons, Environmental Specialist, Magna International

Contact Email Address: timothy.gibbons@magna.com

Purpose of Inspection: Ensure compliance with emission requirements in the plastic molding and surface coating operations

Facility Type: Motor vehicle parts manufacturing

Regulations Central to Inspection: Facility is subject to 40 C.F.R. Part 63, Subpart PPPP - National Emission Standards for Hazardous Air Pollutants (NESHAP) for surface coating of plastic parts and products; 40 C.F.R. Part 63, Subpart 63 DDDDD – NESHAP for major source: industrial, commercial,

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and institutional boilers and process heaters; and facility's renewable operating permit (ROP), MI-ROP-P0429-2023.

Arrival Time: 10:15 AM

Departure Time: 11:50 AM

Inspection Type:

- ☒ Unannounced Inspection
- ☐ Announced Inspection

OPENING CONFERENCE

- ☒ Presented Credentials
- ☒ Stated authority and purpose of inspection
- ☐ Provided Small Business Resource Information Sheet
- ☒ Small Business Resource Information Sheet not provided. Reason: Not a small business
- ☒ Provided CBI warning to facility

The following information was obtained verbally from Timothy Gibbons unless otherwise noted.

Process Description:

Magna International, Inc. (Magna or the facility) manufactures front and rear fascias for several type of vehicles. Thermoplastic olefin (TPO) beads are delivered to the facility via trucks and stored into silos. The TPO beads are then vacuumed from the silos into one of six mold presses. There are four 4,000-ton and two 2,200-ton mold presses. After the mold is complete, the facility uses an open gas flame to sharpen the edges of the fascias. A portion of the fascias go into storage while the others are transported to the coating line.

The coating line consists of a conveyor system that goes through a five-stage parts washer, one adhesive promoter (AdPro) spray booth, three base coat spray booths, two clear coat spray booths, three drying ovens, and three cooling tunnels. Each spray coating operation occurs in a permanent total enclosure (PTE) and emissions are routed to a regenerative thermal oxidizer (RTO). Any paint spillage is washed off with water and then separated. The paint goes into waste storage while the water is recirculated back into the process line. The coated fascias are sent to assembly where parts are added to complete the product. Completed fascias are then shipped to two other Magna plants.

Staff Interview:

The PTE is installed with pressure differential monitors and is set to automatically shut down the paint line if the pressure is greater than -0.007 in H₂O. Fabric filters in the spray booths are replaced periodically. The RTO is kept at a minimum temperature of 1500 degrees Fahrenheit. Magna uses EPA Method 24 to determine the VOC content of each coating batch. Gibbons stated that the results have remained fairly consistent for each batch. Gibbons also stated there has been no instances of RTO bypass in the past 3 years.

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TOUR INFORMATION

EPA Toured the Facility: Yes

Data Collected and Observations:

EPA inspectors observed the coating line and the spray booths from outside the PTE. EPA inspectors observed the control panel for the RTO and viewed a temperature reading of 1533 degrees Fahrenheit.

An opening was observed on the duct venting to the RTO. EPA inspectors asked Gibbons to have the duct inspected to determine if the integrity of the RTO's ability to capture all emissions had been compromised. On June 4, 2024, Gibbons contacted EPA inspectors informing them that observed damage was only covering insulation and that the actual air duct did not have any damage. Repair to the insulation had also been completed as of June 4, 2024.

Photos and/or Videos: were taken during the inspection and are listed in Appendix A.

Field Measurements: were not taken during this inspection.

CLOSING CONFERENCE

☒ Provided U.S. EPA point of contact to the facility

Requested documents:

- Most recent performance/stack test for the RTO
- Monitoring data for the RTO and the PTE between May 6, 2024, and May 15, 2024
- Paint Line Flow Diagram
- VOC and HAP emissions calculations between January 2022 and April 2024
- Annual Emission Report for 2022 and 2023
- Latest Method 24 result for each coating batch

DIGITAL SIGNATURES

Report Author: Smith, Justin Digitally signed by Smith, Justin
Date: 2024.06.27 09:52:14 -05'00'

Section Supervisor: DAKOTA PRENTICE Digitally signed by DAKOTA
PRENTICE
Date: 2024.06.27 10:06:40 -05'00'

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APPENDICES

1. Appendix A: Digital Image Log and Digital Video Log

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Date of Inspection: May 16, 2024

APPENDIX A: DIGITAL IMAGE LOG AND DIGITAL VIDEO LOG

Inspector Name: Ethan Chatfield **Archival Record Location:** *Enf_Magna Dexsys_MI_24*

Image Number	File Name	Date and Time (incl. Time zone and DST)	Latitude and Longitude	Description of Image
1	IMG_1693.JPG	5/16/2024 9:26 AM	NA	Image of RTO
2	IMG_1694.JPG	5/16/2024 9:26 AM	NA	Additional image of RTO
3	IMG_1695.JPG	5/16/2024 9:28 AM	NA	Opening in duct vent to RTO
4	IMG_1696.JPG	5/16/2024 9:30 AM	NA	Control panel for RTO