

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION

FCE Summary Report

| | |
|--|---|
| Facility : Faurecia Interior Systems Saline, LLC | SRN : B2063 |
| Location : 7700 MICHIGAN AVE | District : Jackson |
| | County : WASHTENAW |
| City : SALINE State: MI Zip Code : 48176 | Compliance Status : Non Compliance |
| Source Class : MAJOR | Staff : Mike Kovalchick |
| FCE Begin Date : 10/1/2018 | FCE Completion Date : 9/9/2019 |
| Comments : Facility out of compliance with a daily VOC coating quality limit but in compliance with all other requirements. | |

List of Partial Compliance Evaluations :

| Activity Date | Activity Type | Compliance Status | Comments |
|---------------|----------------------|-------------------|--|
| 08/22/2019 | Scheduled Inspection | Non Compliance | Company remains out of compliance with a daily VOC coating limit but otherwise in compliance. |
| 06/21/2019 | Telephone Notes | | Received a call from Melissa Hall in response to email sent 6/19. She clarified that no processes are being outsourced, but that one process with higher VOC content, that they were going to bring into the facility, will not be brought in. She also indicated that they have been meeting the daily limit most days, but with the facility strike and a shutdown coming up she won't be able to have projected numbers yet. She also stated that they are moving all of their paints towards being water-based, and they are currently going through the testing phases for that change. Melissa will continue to update AQD as they move forward. |

| Activity Date | Activity Type | Compliance Status | Comments |
|---------------|-----------------|-------------------|--|
| 06/18/2019 | Telephone Notes | | Received a voicemail from Melissa Hall regarding information I had requested about their VN response. I had previously emailed Melissa asking when the facility believes they will be back in compliance with the 5 lb/gallon daily limit. Melissa indicated in her voicemail that the facility has been working on changing the process and they have achieved some days that are in compliance with that limit, but some days still are not. |
| 05/28/2019 | MAERS | Compliance | 2018 MAERS ROP Cert. Audit complete. Source reported 30.18 tons VOC, 9.4 tons CO and 11.46 tons NOx. After discussion with facility it is noted that large decrease in throughput for EUAutoPlasCoatLn from 2017 to 2018 is due to an input error for 2017. Also, company provided Rule291 additional info (see paper file). Each individual unit is below the Rule 291 limit, respectively. |
| 05/28/2019 | MAERS | Compliance | 2018 MAERS ROP Cert. Audit complete. Source reported 30.18 tons VOC, 9.4 tons CO and 11.46 tons NOx. After discussion with facility it is noted that large decrease in throughput for EUAutoPlasCoatLn from 2017 to 2018 is due to an input error for 2017. Also, company provided Rule291 additional info (see paper file). Each individual unit is below the Rule 291 limit, respectively. |
| 04/05/2019 | MACT (Part 63) | Compliance | MACT Report, Subpart DDDDD. 2 Boilers reported. EU 166-77 and 403-74. |
| 04/05/2019 | ROP Annual Cert | Compliance | 5 deviations. Cure oven temp not recorded. Deviation resolved 9/12/18. Cure oven temp exceeded 194F. Reset controls for alarm and automatic shut-down - resolved. EUATUPLASCOATLN exceeded 5lb/gal daily VOC limit for more than 270 days. VN will be sent. Recordkeeping and reporting violations for FG-MACT-ZZZZ-EMERGENCY RICE and FGBOILERMACT. Included in VN. |

| Activity Date | Activity Type | Compliance Status | Comments |
|---------------|-----------------|-------------------|--|
| 04/05/2019 | ROP SEMI 2 CERT | Compliance | Cure oven temp exceeded 194F. Cure oven temp has been interlocked with the paint booth controls so alarm sounds at 190F, and the cure oven will shut down if temp reaches 193F. Issue considered resolved. |
| 04/05/2019 | MACT (Part 63) | Compliance | MACT Compliance Report 40 CFR Part 63 Subpart PPPP. Continues to use the compliant material coating option. Did not switch between compliance options during the reporting period. |
| 04/04/2019 | ROP Annual Cert | Compliance | No deviations reported for section 2. |
| 04/04/2019 | ROP SEMI 2 CERT | Compliance | No deviations reported. |
| 10/09/2018 | ROP Semi 1 Cert | Compliance | One deviation related to oven temperature logger not working correctly. Monitor logger fixed. No reason to think that oven temperature requirement of less than 194 F was exceeded. |
| 10/09/2018 | MACT (Part 63) | Compliance | Subpart PPPP..used compliant material option. |

Name: M. Kovalchuk Date: 9/09/2019 Supervisor: 