DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: Scheduled Inspection

B206331569

FACILITY: Faurecia Interior Systems Saline, LLC		**SRN / ID:** B2063
LOCATION: 7700 MICHIGAN AVE, SALINE		**DISTRICT:** Jackson
CITY: SALINE		**COUNTY:** WASHTENAW
CONTACT: Richard Springsteen , HSE Coordinator		**ACTIVITY DATE:** 09/29/2015
STAFF: Zachary Durham	**COMPLIANCE STATUS:** Compliance	**SOURCE CLASS:** MAJOR
SUBJECT: Scheduled inspection of the facilities covered in ROP No. MI-ROP-B2063-2012a. This ROP has two sections; Section 1 = Faurecia, Section 2 = Ford. Both sections were inspected for compliance.		
RESOLVED COMPLAINTS:		

Contacts

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Purpose

Brian Carley and I arrived at Faurecia Interior Systems Saline, LLC at approximately 9:30am of September 29th, 2015. This was a scheduled, announced inspection of the facilities and equipment listed in the sectioned ROP No. MI-ROP-B2063-2012b issued to both Faurecia and Ford Motor Company. The purpose of the inspection was to determine compliance with the federal and state applicable requirements, including Act 451, Part 55, Air Pollution Control regulations and conditions of their Renewable Operating Permit (ROP). We met with representatives from Ford, Faurecia, and Tetra Tech, consultant to Ford. The individuals included Rich Springsteen, HSE Coordinator, Faurecia; Lynn Tucker, Senior Environmental Engineer, Ford; Brandon Kinter, Senior Engineer, Tetra Tech; and Lesa Sweet, Principal Hydrogeologist, Tetra Tech. The inspection occurred in two phases, beginning with the three active units outlined in Ford's part of the ROP (Section 2), and then completing the facility tour of the processes and equipment described under Faurecia's portion (Section 1).

Background

This facility has a sectioned ROP to monitor molding and coating processes operated by Faurecia as well as a remediation project permitted to Ford, and operated by their consultant Tetra Tech. The focus of AQDs involvement is to regulate air emissions from criteria and hazardous air pollutants used or released by processes and equipment at the site. Because the two companies share a contiguous area, the ROP is issued to one unique State Registration Number (SRN).

Faurecia, as permitted in Section 1, operates equipment that molds and coats various pieces of automobile interiors. Today they had dash boards on display from both the Ford Mustang and Explorer. They currently employ about 1,600 people. The property, in addition to the main plant area, also contains a wastewater facility and a heating plant, which provides non-process related heating. The main plant is divided into separate operating areas where different processes and plant functions occur. These areas include coating lines, injection molding, maintenance, spray booths, storage space, and break rooms. Faurecia's operations are all happening within one of their buildings on the property.

Ford is permitted for several soil vapor extraction units situated around the outside of the main Faurecia operating areas. The units vary slightly from one another, but are all built within a mobile trailer. The units are connected to horizontal and/or vertical wells bored into the ground on one end, and work to deliver vapor laden air to activated carbon beds for contaminant collection. The units have historically shown a striking decrease in the amount of contaminants they are removing, which suggests the project is working.

These facilities were last inspected by Glen Erickson in September 2013.

Compliance Evaluation

Section 1

Emission Unit

EU-202-00-S1

This emission unit ceased operation in April 2013 per Glen's last inspection. Recommend removal from ROP upon renewal.

EU-223-95-S1

This emission unit, which was subject to Compliance Assurance Monitoring, has since ceased operation since the last inspection. Recommend removal from ROP upon renewal.

EU-670-78A-S1

I did not observe this water based hand sprayed paint booth being operated today.

All coatings applied in this booth are below the 4.3 lb/gal (minus water) as applied. These values listed in the attached MSDS from United Paint & Chemical. Additionally, the most recent 12-month rolling calendar shows 3.931 tons of VOC emissions (coatings + solvents) from all water based coating operations. This shows substantial compliance with the 27 tpy VOC limit. (See attached MSDS for United Paint & Chemical, 12-month calendar for "WBP Coating Materials" and monthly data)

(Note: The VOC emissions reflect EU-670-78A-S1 and EU-159-74A-S1 combined)

EU-159-74A-S1

I did not observe this spray booth in operation today.

Total water based paint VOC emissions were 3.931 tons during the last 12-month rolling calendar, which shows compliance with the 10 tpy limit from this booth. (Same attachment as above)

(Note: The VOC emissions reflect EU-670-78A-S1 and EU-159-74A-S1 combined; if emissions exceed 10 tpy each booth should show individual compliance with their limits)

Flexible Group

FG-BOILERS-S1

I observed the boilers that are used for steam heating of the plant areas during winter months. Rich informed me that the boilers had not been used for about four months. They are natural gas-fired. I was shown the most recent copy of the boiler certification from the Michigan Department of Licensing and Regulatory Affairs. The last inspection occurred on 7/28/15 and expires after one year. I provided Rich with a copy of the Boiler MACT card for guidance on boiler regulations.

FG-IMCPULINES1&2-S1

I observed both of these lines in good working order today. I was informed by the supervisor and operator working in this area that filters are changed very often, at least once per shift (every 8 hours), if not sooner (about 4 hours). This goes above and beyond the requirement of weekly inspections. Spent filters are disposed of in-plant and were not a source of odors.

Emission limits are as follows:

1. Limit = 35.9 tpy VOCs. Most recent 12-month rolling calendar (see attached) shows 9.36 tons for these two units combined. This shows substantial compliance with both yearly and daily emission limits.
2. Limit = 0.72 lb/gal (minus water) as applied, for coatings. All coatings meet this limit with the highest coating for Dune DN3A from Red Spot Paint & Varnish Co. (see attached MSDS), which is at 0.671 lbs/gal. (Note: this emission limits also applies to FG-IMCPULINES3-S1)

FG-IMCPULINES3-S1

I observed this unit, the largest of the in-mold coating lines, operating in an orderly fashion. I was shown the computer tracking system that accounts for each part that is produced. The display on the monitor showed that each piece was averaging close to 1/10 of a gallon of paint applied. They are required to track every piece by bar code for compliance with manufacturing regulations outside of AQD rules, which also makes it convenient to track process operations and record keeping.

Emission limits are as follows:

1. Limit = 23.6 tpy. Most recent 12-month rolling calendar (see attached) shows 5.51 tons for this unit. This shows substantial compliance with both yearly and daily emission limits.
2. Limit = 0.72 lb/gal (minus water) as applied, for coatings. Meets limit, see note above.

FG-MACTPPPP-S1

All coating lines and spray booths are subject to this MACT standard for surface coating of plastic parts. Faurecia chooses to comply with it by using compliant materials. Material safety data sheets as supplied by United Paint & Chemical and Red Spot Paint & Varnish Co. show that the organic HAP is below the 0.16 lb per lb of coating solids as required by 40 CFR 63.4490(b)(1).

FG-COLDCLEANERS-S1

I observed one cold cleaner in the maintenance area of the main plant area that was well marked and closed at the time. I also saw a smaller one in the heating plant area, which was also closed and well labeled.

FG-RULE 287(c)-S1

These touch-up booths were not operating at the time of inspection.

MAERS reporting shows that significantly less than 200 gallons per month was used during 2014 reporting year.

FG-MACT-ZZZZ-EMERGENCY RICE-S1 <500 HP

I observed one of the emergency generators out back of the heating plant and several other smaller units inside. Records showing run time were observed on site and were extensive for each unit. The records appeared to show that they were following the testing and maintenance requirements outlined in 40 CFR 63 Subpart ZZZZ.

PTI 35-13

EUAutoPlasCoatLn

This is a water based coating line that has not been rolled into the ROP yet. I observed this unit operating today and was given a thorough overview of the equipment since I was not aware of this before the inspection date. Rich provided me with a copy of PTI 35-13, which describes the unit. The three stages of filters were equipped with pressure drop gauges; 1st stage = 0.36 in H2O, 2nd stage = 1.6 in H2O, and 3rd stage = 2.0 in H2O. The firebox temperature read 187°F, which is below the maximum operating temp of 194°F. I was shown the variety of filters and the stock they keep close by. I was also informed that the filters are changed out routinely; ~1 time per week on for exhaust directly into the plant area (3rd stage) and daily for the filter directly in contact with the paint booth area (1st stage).

Section 2

Emission Unit

EU-OU-6-S2

This unit was operating today and contains four vertical wells. I was told by Brandon, Tetra Tech, that this unit was only using SVE. Also, this unit can be control remotely from a wireless connection. It appeared to be in good shape. This unit does not operate during the winter, so the carbon filter beds are not enclosed in a container, but

rather sit adjacent to the trailer. The carbon filters are stored during the winter.

Flexible Group

FG-REMED-S2

This group consists of EU-OU-4-S2 and EU-OU-5-S2. Operable unit 4 consists of both vertical and horizontal wells. Brandon told me the horizontal wells are situated at ~8ft deep and the vertical wells reach up to ~15ft deep. OU5 has 5 wells; 3 SVE and 2 air sparge. Both of these units are attached to a container with a series of three carbon filters. The filters on OU5 were changed ~6 months ago. I recorded the following data from the instrument panel inside OU5; Vacuum = 9.8, 217 cfm, 127°F before heat exchanger, SVE = 13850 hours, and Air sparge = 04460 hours. Both units seemed to be well maintained.

FG-RULE 290-S2

This section covers EUSVE-OU7-S2, which was operating under the Rule 290 exemption. The unit, however, has been decommissioned and is no longer operating.

Summary

Upon arriving at the facility, Brian and I signed in at the security desk and watched the safety video that was running in the lobby. Representatives from Ford and Tetra Tech were also present. We received white lab coats and reflective vests. The vests are required while walking on the outside of the fenced in property, which was necessary for inspecting the units permitted to Ford in Section 2. The white lab coat (or white shirt) is required while walking around the inside of the plant areas to observe processes and equipment operated by Faurecia in Section 1. Rich Springsteen arrived shortly after and directed us to a meeting room.

I addressed those in attendance to discuss why AQD was conducting the inspection and passed out copies of the Environmental Inspections brochure and my contact information. As we conducted the pre-inspection meeting it was determined that in the interest of time, personnel, and weather conditions that we begin with Section 2 of the ROP. From there we headed out to the three active units currently being operated. All units appeared to be well maintained and operating smoothly. Having received and reviewed the Soil Remediation Emission Calculation & Recordkeeping submittals recently, which indicate substantial compliance with permitted air emissions, I did not request additional documents in our wrap-up meeting.

After Ford and Tetra Tech representatives left, Rich, Brian and I continued with a short discussion about Section 1 of the ROP. After hearing what I was interested in seeing, Rich proceeded to lead us on a tour of the plant facilities. We first saw the three different in-mold coating lines (IMC) that creates a molded piece of polyurethane and subsequently paints each part. The spray coating booths and associated filters appeared to perform the necessary particulate controls.

From there we were shown the equipment outlined in PTI 35-13, which I was not familiar with and not yet included in the ROP. We returned to the meeting room and Rich provided me with a copy of the permit issued in May 2013. After a review of the conditions we returned to the area and I observed the pressure gauges and electronic controls. The area was kept up well and generally free of debris/odors normally associated with fugitive emissions.

We also briefly looked over the maintenance area where some tools were stored for basic repairs or being prepared to be sent out for more thorough work. I observed a cold cleaner near the back wall that was well labeled and closed. I was told that it isn't used very often.

Next, we toured the heating plant to look at the boilers and the emergency generators. The boilers are strictly for steam heating and haven't been used for several months according to Rich. I observed the most recent certification posted in the office. The 88 HP Generac Natural Gas Generator was out back of the heating plant and the rest of the diesel pumps were located inside. There was also a small cold cleaner located in this area that appeared well kept and had a closed lid.

Rich also took us on a brief tour to observe the injection molding processes that occur inside the plant, though these pieces of equipment are not subject to permitting under AQD rules. Rich informed us that there are ~12 different types of plastic used to create desired characteristics of the products and ~15 tool changes per day.

They have several sizes of injection molding lines for different tooling setups and part sizes.

Having concluded our tour, we went back to the meeting room to have our closing meeting. This is when I requested to see record keeping documents. Rich emailed me product specs for the three water based paints (WBP) they used as well as spreadsheets for the last 12 months of VOC Daily Totals; including WBP Coating Materials and WBP IPA Parts Wipe 12-month rolling calendars. Rich has also provided me with the coating material data and 12-month rolling calendar for the Spray Polyurethane (SPU) 1, 2, and 3 used to demonstrate compliance. I also observed the extensive emergency generator data on site, which documented service hours and maintenance for the MACT standard under 40 CFR 63 Subpart ZZZZ.

Compliance Status and Recommendations

After reviewing the documents received and thorough inspection of the facilities and equipment operating at this location under a two-part sectioned ROP, I determined both Ford and Faurecia to be in compliance with the conditions outline in their permit.

I would recommend that EU-202-00-S1 and EU-223-95-S1 be removed from the ROP during the renewal process. Additionally, PTI 35-13 should be rolled into Section 1 of the ROP also during permit renewal.

I also recommend that FG-RULE 290-S2 be removed or edited under Section 2 to reflect the fact that EUSVE-OU7-S2, which is the purpose of the flexible group, has been decommissioned.

NAME Zack Durham DATE 11/23/15 SUPERVISOR