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

B206341733

FACILITY: Faurecia Interior Systems Saline, LLC		**SRN / ID:** B2063
LOCATION: 7700 MICHIGAN AVE, SALINE		**DISTRICT:** Jackson
CITY: SALINE		**COUNTY:** WASHTENAW
CONTACT: David Kolasinski , HSE Manager		**ACTIVITY DATE:** 09/06/2017
STAFF: Zachary Durham	**COMPLIANCE STATUS:** Compliance	**SOURCE CLASS:** MAJOR
SUBJECT: This was a scheduled inspection of MI-ROP-B2063-2012b and PTI 35-13. A multimedia inspection occurred concurrently with Luke Golden, WRD, to inspect wetland restoration on the property. Members of Ford, Faurecia, and Tetra Tech were present during the inspection.		
RESOLVED COMPLAINTS:		

Contact

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Purpose

This was a scheduled, announced inspection of the facility located at 7700 E Michigan Ave, Saline, MI. I arrived on site at around 10:00am on 9/6/2017 to perform an inspection of MI-ROP-B2063-2012b and Permit to Install (PTI) 35-13. I was accompanied by Luke Golden, Water Resources Division, who was present to conduct an inspection of a wetland reclamation project on the property. Others in attendance included representatives from Ford, Tetra Tech, and Faurecia.

Background

This site was last inspected in September 2015 and found to be in compliance at the time of the inspection. Since then, the AQD has received an application for the renewal of their Renewable Operating Permit (ROP). The application is currently still in the draft form as comments are being addressed.

Faurecia operates equipment identified in Section 1 of the ROP and Ford has equipment listed in Section 2. Faurecia's section includes conditions for the main plant production of interior car parts, which include the technologies for creating those parts such as injection molding and surface coating. Ford's section includes several soil vapor recovery (SVE) units that are actively remediating historically identified contamination at the site.

Much of the equipment currently written in the existing ROP has since been removed, and the draft ROP reflects this. Permitted and exempt equipment added to the facility since the issuance of the last ROP is being addressed in this inspection and draft ROP.

Equipment operated on this site is subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) in 40 CFR Part 63, Subpart PPPP for Surface Coating of Plastic Parts.

Compliance Evaluation

Section 1 – Faurecia

EU-202-00-S1

This is an emission unit (EU) for a coating line in the existing ROP that has been removed as of 2013.

EU-223-95-S1

This is an EU for a coating line in the existing ROP that has been removed as of 2013.

EU-670-78A-S1

This is an EU for a coating line in the existing ROP that was dismantled in 2013 and physically removed in 2016.

EU-159-74A-S1

This is an EU for a coating line in the existing ROP that has been removed as of 2013.

FG-BOILERS-S1

This is the flexible group (FG) for boilers that are used to provide steam for building heat that are used primarily in the winter months. The boilers were not operating at the time of inspection. Conditions for the NESHAP in 40 CFR 63, Subpart DDDDD (5D) for boilers at a major source of HAPs are being added to the draft ROP. Faurecia has submitted a compliance plan for subject boilers that will need the required tuning per 5D with their ROP renewal application. The most recent boiler safety checklists are attached.

FG-IMCPULINES1&2-S1

This is the FG for two of the in-mold coating lines. This FG has a VOC emission limit of 35.9 tons per year (tpy) based on a 12-month rolling time period. Attached to this report are monthly totals from each line and the 12-month rolling total going back to 2015. As of September 2017 the VOC emissions totaled 4.56 tons for the last 12 months. This is well below the permitted limit and relatively consistent with data reported in the last Michigan Air Emissions Reporting System (MAERS) cycle for 2016.

FG-IMCPULINES3-S1

This is the FG for the third in-mold coating line. The attached spreadsheet indicates 10.56 tons of VOC from the last 12-month rolling time period as ending in September 2017, which is below the permitted limit of 23.6 tpy. This represents an increase in throughput from previously reported emissions in MAERS, which since 2015 hadn't exceeded 5 tpy on a 12-month rolling time period. These emissions reflect the combined coating and cleanup activities.

FG-MACTPPPP-S1

This is the FG for sources that are subject to the NESHAP in 40 CFR Part 63, Subpart PPPP for surface coating of plastic parts. The facility uses primarily water-based coatings that do not exceed the emission limit of 0.16 pounds organic HAP per pound of coating solids. This regulation also includes material limits on thinners, additives, and cleaning materials as having no organic HAP. The existing ROP contains all compliance options for Subpart PPPP, however, the draft ROP is removing a portion for add-on controls since that equipment has been removed. The facility chooses to comply with Subpart PPPP using the compliant materials option as written in the regulation and the FG.

FG-COLDCLEANERS-S1

This is the FG for cold cleaners on site that meet the PTI exemption in Rule 281(2)(h). All cold cleaners that I observed during the inspection were closed and appeared to be operating according to requirements of this section.

FG-RULE 287(c)-S1

This is the FG for emission units that are exempt from requiring a PTI in Rule 287(2)(c). Attached is a list of all repair booths, which appear to also meet the exemption in Rule 287(2)(b) for hand-held aerosol application from a container no larger than 8 ounces.

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

This is the FG for emergency generators located on site. I observed records during the inspection that appeared to show regular maintenance as required under 40 CFR Part 63, Subpart ZZZZ for emergency engines. I did not observe any engines operating at the time of inspection.

EU-AutoPlasCoatLn

This is the EU described in PTI 35-13 for a coating line that is being rolled into the draft ROP. The attached emission spreadsheet has 12-month rolling totals of VOC and acetone as listed in the PTI. The coating, purge and cleanup portion is reported as 13.94 tons VOC for the last 12 months, which is below the limit of 35.9 tpy VOC. The parts wipe portion has a limit of 6.5 tpy VOC and is reported as 0.03 tons for the last 12 months. Acetone emissions are reported at 0.11 tpy and under the 11.5 tpy limit. I also observed that the cure oven was set to 170°F.

Other Exempt Equipment

During the inspection I observed two processes operating at the site that were previously unknown to be located onsite. The first, identified as the Shogo ovens is for a slush molding activity that now consists of four (4) individual units. These lines appear to meet the exemption listed in Rule 286(2)(a) for rotational molding, whereby a shell is heated and then a powdered PVC material is added to the casting mold to form the component.

The second process, IMGL, consists of four (4) individual electrically heated units that use a hot melt glue. The exemption being claimed here is under Rule 287(2)(i).

Attached is email correspondence containing the information required by Rule 278 and 278a, which appears to satisfy the requirements. Also attached are the SDS's for the materials used in each process.

Section 2 – Ford

The existing ROP no longer accurately describes the operations occurring under Section 2. Ford has since provided a demonstration that all soil vapor extraction (SVE) operable units (OU), including OU-4, OU-5, OU-6, and OU-17 will qualify for the PTI exemption in Rule 291. Currently OU-4 and OU-6 have been issued PTI 199-16 that was planned to be rolled into the draft ROP. Adherence to Rule 291 will make PTI 199-16 unnecessary and should be processed for void.

Summary

I arrived on site with Luke Golden (WRD) at about 10:00am and we took a walkthrough of the wetland restoration activities with Ford, Tetra Tech, and Faurecia staff. At about 10:45am we began the inspection of air related permits.

While outside of the facility, we started by observing OU-6. The unit was not running at the time, and Tetra Tech staff indicated that it may be shut down altogether in a few months. We did not observed any other SVE units at the time, including OU-4 and 5, and were told that OU-17 has yet to start up.

Having completed the exterior facility tour and Section 2 of the ROP, we proceeded inside and sat down to discuss the progression of the remaining portion of the inspection. It was determined at the time that Ford and Tetra Tech staff were no longer required, so they exited the facility. Dave Kolasinski was present for Faurecia for the remainder of my time at the facility. We walked through the boiler house briefly, though none were currently operating. We did a general walkthrough of the facility to observe the various injection molding, coating, and assembly lines.

Of concern at the time of inspection were the Shogo Ovens and IMGL activities. Neither of which has been previously identified in a PTI or facility inspection. As discussed above in the "Compliance Evaluation" the facility has provided supporting documentation for their exemption from requiring a permit.

Dave also walked Luke and I through what is being called the West warehouse, which is the planned area for robot-assisted assembly of interior components. Automation will be conducted by self-propelled robotic drones. These robots will maneuver the floor and deliver specific parts to manned operator stations for assembly. Some plastic welding will be conducted in this area when it becomes operational.

Having conducted a complete facility tour, we proceeded back to the conference room to discuss the last part of my inspection. It was at this time that I requested recordkeeping documents from Dave, which were reiterated in a follow up email. I also requested additional information regarding the previously installed Shogo ovens and

IMGL associated activities.

As of 10/31/2017 I have received all requested documents for permitted and exempt equipment.

Compliance Determination

After onsite inspection and review of facility recordkeeping documents, including emissions spreadsheets and exemption demonstrations required by Rule 278, 278a, and 291, I have determined that the facility is in compliance with federal and State of Michigan air rules and regulations and special conditions of MI-ROP-B2063-2012b and PTI's 35-13 and 199-16.

NAME Jack Dunham DATE 11/8/17 SUPERVISOR