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

B206350267

FACILITY: Faurecia Interior Systems Saline, LLC		**SRN / ID:** B2063
LOCATION: 7700 MICHIGAN AVE, SALINE		**DISTRICT:** Jackson
CITY: SALINE		**COUNTY:** WASHTENAW
CONTACT: Melissa Hall ,		**ACTIVITY DATE:** 08/22/2019
STAFF: Mike Kovalchick	**COMPLIANCE STATUS:** Non Compliance	**SOURCE CLASS:** MAJOR
SUBJECT: Company remains out of compliance with a daily VOC coating limit but otherwise in compliance.		
RESOLVED COMPLAINTS:		

Major Source for VOC-Major Source for HAPs-Full Compliance Evaluation (FCE)

Facility Contact

Melissa Hall-HSE Manager

Melissa.hall@faurecia.com phone: 734-328-4224

Purpose

On August 22, 2019, I conducted an unannounced compliance inspection of Faurecia Interior Systems Saline, LLC (Company) located in Saline, Michigan in Washtenaw County. The purpose of the inspection was to determine the facility's compliance status with the applicable federal and state air pollution regulations, particularly Michigan Act 451, Part 55, Air Pollution Control Act and administrative rules and the Company's Renewable Operating Permit (ROP) No. MI-ROP-B2063-2018.

Facility Location

The facility is in Saline in a commercial area. Residential homes are located about 1500 feet to the west of the facility.

Facility Background

The facility was last inspected on September 6, 2017 and found to be in compliance. More recently in 2019, the Company self-reported some compliance issues. On 4/12/2019, a Violation Notice was issued to the Company for failing to meet a pounds of VOC per gallon of coating limit it emission unit. The Company also had failed to keep required maintenance related records for FG-MACT-ZZZZ-EMERGENCY RICE and had failed to conduct an energy assessment for FG-BOILERMACT. The facility has approximately 2200 employees and operates 24 hours a day, seven days a week.

Faurecia operates equipment identified in Section 1 of the ROP and Ford Motor Company operates under 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 is still active but only has general conditions as the several soil vapor recovery (SVE) units that are still actively remediating historically identified contamination at the site are now considered exempt from permitting. Since there are no specific requirements for Ford, the inspection focused on Faurecia's section of the ROP.

Regulatory Applicability

The entire facility currently operates under ROP No. MI-ROP-B2063-2018 that was issued on August 20, 2018.

The facility is considered a Major source of VOC and a Major source of HAPs.

The facility is subject 40 CFR Part 63, Subpart PPPP (NESHAP for Surface Coating of Plastic Parts and Products)

The facility is subject to 40 CFR Part 63, Subpart ZZZZ (NESHAP for Stationary Reciprocating Internal Combustion Engines)

The facility is subject to 40 CFR Part 63, Subpart DDDDD (NESHAP for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters-aka BOILER MACT.)

There are several PTI exempt processes at the facility that were listed in the recent ROP renewal application. These include the following:

EUSMALLHEATERS-Natural gas heaters.

EUWASTEOILSTORAGE-Waste oil storage.

EURECLAIMOILSTORAGE-Reclaim oil storage.

EUGASOLINETANK-500-gallon gasoline storage tank

Arrival & Facility Contact

Visible emissions or odors were not observed upon my approach to the Company's facility. I arrived at 9:00 am, proceeded to the Company's front office to request access for an inspection, provided my identification and spoke with Melissa Hall (MH) HSE Manager for the facility.

I informed her of my intent to conduct a facility inspection and to review the various records as necessary.

MH extended her full cooperation during my visit and fully addressed my questions.

Pre-Inspection Meeting

The pre-inspection meeting focused on determined which processes were still active at the facility and steps that the Company has taken to get back into compliance with the VN that was issued on 4/12/2019.

MH indicated the boilers associated with FG-BOILERS are only operated in the winter are oversized for building heat and maybe replaced with much smaller natural gas unit that lack oil back-up capacity like the current ones. FG-IMCPULINES3 has been completely removed. In-mold coating line #2 which is part of FG-IMCPULINES1&2 has been also completely removed. In-mold coating line #1 which also is part of FG-IMCPULINES1&2 was last active in March and will be used only a very limited basis going forward. EU-AutoPlasCoatLn is now the only source of significant emissions remaining at the facility.

MH indicated that they are close to complying with the daily average of 5 lbs VOC /gal as applied limit in EU-AutoPlasCoatLn and so far were only just over the limit on a couple of days in August and expect to be fully in compliance with the limit in the near future. I indicated to MH to provide monthly progress till this issue is fully resolved. On related matter, the Company is prepared a new PTI application for EU-AutoPlasCoatLn. This application is necessary because they anticipate an increase in emissions due to a period of overlap of doing work for an existing truck and future truck at the same time. This could result in an exceedance of their 12-month rolling average limit of 28.4 tons. The application is expected to be submitted in the next couple of weeks.

Onsite Inspection

We did a general walkthrough of parts of the facility to observe the various injection molding, coating, and assembly lines. We first visited EU-AutoPLasCoatLn. Walking through the facility to arrive there, I noted numerous types of odors of moderate intensity inside the building. (Some minor amounts of acetone like smell noted outside the building in the parking lot after departing the facility that was likely related to EU-AutoPlasCoatLn. Acetone is used to purge/clean lines during coating change-out.)

EU-AutoPlasCoatLn itself was unremarkable. It was fully enclosed and automated. A dry filter system is used with the filters being changed once per day. A single drying oven is used, and it was operating at setpoint temperature 175 degrees F. (Limit 194 F.)

In-molding coating line #1 which is part of FG_IMCPULINES1&2 was also visited. However, access to the area was blocked by debris. It appeared to be completely in-active. None of the other emissions units were visited since they weren't currently active.

Note: The roof of the facility was not inspected. Prior approval from their corporate office in France must be obtained for any personnel going on the roof.

Recordkeeping/Permit Requirements Review

-MAERS Review

Facility is operating at only fraction of permitted emission limits. Approximately 30 tons of VOC emissions reported in 2018 along with about 10 tons of NOx and 10 tons CO reported as well.

Overall, 2018 MAERS shows compliance.

-Permit Requirements Review

FG-BOILERS-S1/FG-BOILERMACT (Compliance)

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.

The required Boiler MACT onsite work for the Energy Assessment has been completed and a draft report has been issued. The draft report included the following recommendations:

Implementation of recommendations will depend on the short- and long-term direction of the central boiler plant. Based on observations of equipment age and condition, a full boiler replacement that includes assessment – and potential replacement – of the distribution system may be warranted. A boiler replacement project should inherently include many of these individual energy conservation recommendations:

1. Insulate all steam and condensate piping and related components in the boiler room.
2. Assess the need for heated fire protection storage tanks. Reduce or eliminate tanks.
3. Install stack economizer to heat fire protection storage tanks.
4. Improve control of fire protection tank heating.
5. Upgrade burner control system to modulating, linkageless type.
6. Audit steam traps and repair as needed.
7. Install variable speed drives and upgrade pumping and heating controls on the FP tank system.
8. Fully re-commission the existing boiler and load side of the steam system, including AC-10 and 11 steam coils and all terminal units.
9. Improve documentation of the existing system, and compile all equipment information in one place.
10. Improve chemical treatment of the boiler system.

Attachment (1) contains additional Boiler MACT compliance information.

FG-IMCPULINES1&2 (Compliance)

This is the FG for two of the in-mold coating lines. (IMCPULines2 has been completely removed. IMCPULines1 has been recently ideal since beginning of March.) This FG has a VOC emission limit of 35.9 tons per year (tpy) based on a 12-month rolling time period. Attachment (4) are VOC records for 2019. Monthly VOC emissions were averaging only about 0.5 tons per month when the line was operating.

FG-MACTPPPP-S1 (Compliance)

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 facility chooses to comply with Subpart PPPP using the compliant materials option as written in the regulation and the FG. A check of required reporting for this NESHAP shows compliance.

FG-COLDCLEANERS-S1 (Compliance)

This is the FG for cold cleaners on site that meet the PTI exemption in Rule 281(2)(h). No cold cleaners were observed during the inspection.

FG-RULE 287(c)-S1 (Compliance)

This is the FG for emission units that are exempt from requiring a PTI in Rule 287(2)(c). The facility has a number of hand-held aerosol can application booths that meet the exemption. These booths were not reviewed during the inspection since very minor source of emissions.

FG-MACT-ZZZZ-EMERGENCY RICE-S1 <500 HP (Compliance)

This is the FG for emergency generators located on site. I did not observe any engines operating at the time of inspection. The following shows the hour counter readings changes between January and July 2019 which show minimal usage.

Pump 612 (Counter Hours)
January 8, 2019 652.3
July 17, 2019 660.1

Pump 613 (Counter Hours)
January 8, 2019 1181.75
July 26, 2019 1189.60

Pump 614 (Counter Hours)
January 9, 2019 1101.44
July 26, 2019 1110.62

Diesel Wet Well Pump has been removed

Attachment (2) contains additional compliance information for the engines.

EU-AutoPlasCoatLn (Non-Compliance)

This is the EU described in PTI 35-13 for a coating line that is being rolled into the 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 27.42 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 0.1 tons for the last 12 months. Required VOC records are found in Attachment (3). The ROP condition number are noted to show which data goes with what condition in the ROP. Condition 3c is for daily VOC content. Attachment (3) shows numerous days in 2019 that exceed the 5 pounds/gallon limit with the most recent date to exceed it was on August 18. As already noted, a VN has already been issued for this on-going compliance issue. Subsequent to the inspection, the Company provided the following update to resolving this issue:

"Update of Compliance with 5 pound/gallon daily limit:
Faurecia has made several adjustments to address the non-compliant situation.

1. May 22, 2019 – Ramping up the launch of a new program utilizing paint with a VOC content of 0.79 pounds/gallon-exempt began to bring the average down (5.31 prior to 5/22, 5.04 between 5/22 and 8/2)
2. August 2, 2019 – Full launch of the new program and adjustments made to optimize spray patterns completed. The average in August in 4.42. Two days after the completion of these initiatives exceeded the limit (8/5 & 8/18).
3. The plant has been awarded a replacement product line for the product line utilizing the high VOC paints. Three paints are required for the new product line, all three have lower VOC Content (less exempt - as mixed) than the average of the current paints and two of them are below 5 pounds/gallon."

Post-Inspection Meeting

After the inspection, I met with MH to discuss the results. The only outstanding compliance issue remains the exceedance of the 5 pounds of VOCs/gallon daily limit for EG-AutoPlasCoatLn. I requested that the Company continue to submit monthly progress reports on this issue until fully resolved. I thanked MH for her time and corporation and departed the facility around 10:30 am.

Compliance Summary

The Company remains out of compliance with their 5 pounds of VOCs/gallon daily paint limit for EG-AutoPlasCoatLn. A VN has been previously issued for this emission exceedance. It appears that the Company is working towards resolution of this issue in the near future. All other emission units at the facility appear to be in compliance.

NAME M. Kovalchick DATE 9/9/2019 SUPERVISOR