

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: Off-site Inspection

B206356302

FACILITY: Faurecia Interior Systems Saline, LLC		SRN / ID: B2063
LOCATION: 7700 MICHIGAN AVE, SALINE		DISTRICT: Jackson
CITY: SALINE		COUNTY: WASHTENAW
CONTACT: Leslie Wiggins , HSE Manager 2020		ACTIVITY DATE: 12/09/2020
STAFF: Stephanie Weems	COMPLIANCE STATUS: Non Compliance	SOURCE CLASS: MAJOR
SUBJECT: Scheduled, targeted, announced inspection. Conducted virtually through Microsoft Teams Meetings due to ongoing COVID-19 pandemic. Company has been out of compliance with daily VOC limit - VN issued Sept. 2020 still considered unresolved. Records show compliance with limit since August 31, 2020. Company appears to be in compliance with all other permit requirements.		
RESOLVED COMPLAINTS:		

Major Source Inspection (PCE) and Full Compliance Evaluation (FCE) for Faurecia Interior Systems Saline, LLC

Facility Contact

Leslie Wiggins-HSE Manager

Leslie.wiggins@faurecia.com

phone: 734-328-4224

Purpose

On December 9, 2020 I conducted an announced, virtual compliance inspection of Faurecia Interior Systems Saline, LLC located in Saline, Michigan in Washtenaw County. This inspection was conducted virtually through Microsoft Teams Meetings due to the ongoing COVID-19 pandemic. 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, the company's Renewable Operating Permit (ROP) No. MI-ROP-B2063-2018, and Permit to Install (PTI) 35-13A.

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 August 22, 2019 and found to be in compliance except for exceedances of the daily VOC limit for EUAUTOPLASCOATLN.

In 2019 the company self-reported a few compliance issues. On 4/12/2019, a Violation Notice was issued to the Faurecia for failing to meet a pounds of VOC per gallon of coating limit for the EUAUTOPLASCOATLN emission unit. The company had also failed to keep required maintenance related records for FG-MACT-ZZZZ-EMERGENCY RICE and had failed to conduct an energy assessment for FG-BOILERMACT. These violations were considered resolved on May 7, 2019 when the company provided specific information as to how they planned to meet their daily

VOC limit, as well as implemented actions for better recordkeeping and conducting the energy assessment.

On June 3, 2020, Faurecia was issued PTI 35-13A for modifications to the permit requirements for EUAUTOPLASCOATLN. This permit increased their VOC tons per year (tpy) emissions, and it changed the way the facility can calculate their daily VOC/gallon amount. With this permit modification, the facility can use calendar day or shifts that comprise a facility workday to calculate their daily VOC/gallon amount.

On September 30, 2020 the facility was issued another VN for exceeding their daily VOC limit for EUAUTOPLASCOATLN. At the time of this inspection this VN has not been resolved. The facility has indicated that they are working on changing to lower VOC/water-based coatings, but the balance between their daily solvent based and water-based coatings usage can be thrown off by what kind of coatings the original equipment manufacturers (OEMs) want on their parts. Additionally, Faurecia states that they are continuing to shift the solvent based coatings to water-based coatings, and they are researching the feasibility of installing a regenerative thermal oxidizer (RTO). Furthermore, before scheduling this inspection, Faurecia notified AQD that no exceedances had occurred during all of September 2020 or the first half of October 2020 (which is what their records were currently update through). Currently, AQD has requested that the facility send monthly updates of the daily VOC/gallon records for EUAUTOPLASCOATLN.

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, issued on August 20, 2018, and PTI 35-13A, issued June 3, 2020.

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 most 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

Pre-Inspection Test Call

On December 8, 2020 a pre-inspection test call was held with Leslie Wiggins, HSE Manager, and Jeff Sedgwick, Corporate HSE Manager, from Faurecia's corporate group to make sure that the Microsoft Teams Meeting technology was working on both ends.

I started the meeting at 1:55 PM. I introduced myself to Leslie and Jeff and provided some basic information about AQD's inspection process. We discussed how the inspection will proceed tomorrow and what I am expecting to look at. The meeting ended at 2:13 PM.

Arrival & Facility Contact

I started the Microsoft Teams Meeting at 9:24 AM and was joined by Leslie Wiggins, Stephanie Jarrett (facility consultant), Jeff Sedgwick, Amanda Masterson (U.S Regional HSE Manager), and David Jawoski (HSE Specialist).

I informed them of my intent to conduct a facility inspection. The Faurecia staff extended their full cooperation during my visit and fully addressed my questions.

Pre-Inspection Meeting

The pre-inspection meeting focused on gaining some basic information about the facility, determining which processes are still active, and steps that the company has taken to get back into compliance with the VN that was issued on September 30, 2020.

The facility currently employs approximately 1500 people. They operate 24 hours a day, Monday through Friday. Leslie explained that they do operate on the occasional Saturday based on demand.

I asked if there had been any changes (other than the permit modification/issuance of PTI 35-13A) at the facility since the last inspection. Leslie indicated the boilers associated with FG-BOILERS have not been replaced and she confirmed that they are only operated in the winter. FG-IMCPULINES1&2 and FG-IMCPULINES3 have been removed. EU-AUTOPLASCOATLN is now the only source of significant emissions remaining at the facility.

I proceeded to ask Leslie and Stephanie about EUAUTOPLASCOATLN and the associated permit modification that was approved in June 2020. Stephanie explained that the facility had initially requested a change to the averaging time for how they calculate the daily VOC/gal limit to a weekly averaging time. It appears that this change would have required a SIP approval, so the facility negotiated for changing

the averaging time to a choice of work shift or calendar day. Leslie and Stephanie explained that this was necessary because the EUAUTOPLASCOATLN will start operation at 10PM and, depending on the parts set to be painted, averaging by calendar day for the two hours of operation on a Sunday night would result in a documented exceedance. Additionally, Leslie and Stephanie explained that Saturday is considered a “make-up” day, so any parts that may need to be redone because they don’t meet the requirements of production will be repainted that day. Depending on what parts need to be repainted, this could result in exceedances. Stephanie explained that when the facility is running a new product line there may need to be more parts redone on the make-up day due to learning the new line and process.

I then asked Stephanie and Leslie if they are working on submitting an ROP modification for incorporating the new PTI into the ROP. Stephanie indicated that she has it in a draft form currently, and she anticipates being able to submit it before the end of the year.

We then discussed the exceedances of the daily VOC/gal limit for EUAUTOPLASCOATLN. I indicated that the records submitted show the facility hasn’t had an exceedance since August 30, 2020. Leslie explained that they have been working hard to train employees and to schedule the painting of parts in way to better meet the emission limit. Leslie indicated that they don’t foresee any issues that would cause them to not to continue meeting the emission limit moving forward. I asked Leslie to provide monthly progress reports (to be sent on the 16th of each month) until this issue is fully resolved.

Onsite Inspection

As stated before, this onsite inspection portion was conducted virtually due to COVID-19 precautions. Because of this and the basic safety concerns of moving throughout a manufacturing facility with phones/computers, I requested that we only view the emission units/flexible groups/control devices that were operating.

I had outlined to Leslie what units and devices I wanted to observe. Leslie had set it up to where there would be Faurecia staff located throughout the plant who would call in to the Microsoft Teams Meeting and help to show us through the video anything that I asked to see. This worked out well on both ends by allowing me to observe the necessary units/control devices while the plant was able to ensure employee safety by not having employees walking through the entire plant while on their phone/video.

FG-BOILERS/FG-BOILERMACT

This is the flexible group (FG) for two natural gas-fired steam boilers with fuel oil burning capabilities. Leslie confirmed that these units have not been replaced and they are only used in the winter months. We did not observe the boilers during this inspection.

FG-IMCPULINES1&2

This is the FG for two of the in-mold coating/ polyurethane coating processes. Each process consists of three individual coating lines, a single mold release booth, a

single masking station, and a single tool cleaning booth. Leslie and Stephanie confirmed that this FG has been removed.

FG-MACTPPPP

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

This is the FG for any cold cleaner that is grandfathered or exempt from Rule 201 pursuant to Rule 278, 278a, and Rule 281(2)(h) or Rule 285(2)(r)(iv). No cold cleaners were observed during this inspection.

FG-RULE 287(2)(c)

This is the FG for emission units that are exempt from requiring a PTI pursuant to Rule 287(2)(c). Leslie and Stephanie confirmed that these units have been removed. These units were used in association with the IMCPULINES, and they were removed when the IMCPULINES were removed.

FG-RULE290

This FG covers any emission unit that emits air contaminants and is exempt from the requirements of Rule 201 pursuant to Rules 278, 278a, and 290. The facility operates two emission units under this FG (EU-GlueRobot and EU-CastSkins). Andrei Badau, HSE VIE, joined the call to show me the glue booth robots. I was able to see that the unit had filters installed, and the filters looked to have been replaced recently as they were very clean. Andrei also showed me where they keep rolls of the filter for replacing the spent filters.

FG-MACT-ZZZZ-EMERGENCY RICE

This is the FG includes existing “certified” emergency stationary reciprocating internal combustion engines (RICE) that have a maximum site rating of 500 brake horsepower (HP) and less than 20 liters per cylinder.

We were joined in the call by Jeff Weidmayer, facilities manager, so he could show us these units. Three of the units (Pump612, Pump613, and the Generac) are located on one side of the plant and the fourth unit (Pump614) is located on the opposite side. Jeff showed us the non-resettable hour meters on Pump612, Pump613, and the Generac unit. Due to the fourth unit being on the other side of the facility I did not ask to observe that unit, but previous inspection reports indicate that it is equipped with a non-resettable hour meter.

Leslie confirmed that EU-WetWellPump has been removed.

EU-AUTOPLASCOATLN

This is the emission unit (EU) described in PTI 35-13A for an automotive interior parts coating line. The coating line includes an adhesion promotion flame cell, CO2 cleaning booth, destat booth, two robotic applicators within a single coating booth, flash-off tunnel, and associated natural gas-fired cure oven. The air-dried coatings used in this unit are water-based and solvent-based paints, and water or solvent is used for purge and cleanup.

We were joined by Jason Allmon, HSE coordinator, to view this line. This line is completely enclosed and automated. Jason showed me a few sections of the line, and I was able to see that the filter panels were installed. The line appeared to be well-kept and the filters looked very clean, indicating that they are changing them out as necessary. Jason also showed me the oven temperature reading. The oven appears to have a setpoint temperature of 175 degrees F, meeting the permit limit of below 194 degrees F.

Leslie confirmed that the coating line is still equipped with and using HVLP applicators.

Recordkeeping/Permit Requirements Review

On November 10, 2020 the following record request document was sent to Leslie via email:

RECORD REQUEST

ALL RECORDS REQUESTED FROM JANUARY 2020 TO PRESENT UNLESS OTHERWISE NOTED

EU-AUTOPLASCOATLN

- Current listing from the manufacturer of the chemical composition of each material, including the weight percent of each component. The data may consist of Safety Data Sheets, manufacturer's formulation data, or both.
- The following daily records for EUAutoPlasCoatLn:
 - Gallons (with water) of each VOC and tert-butyl acetate containing material used and reclaimed.
 - VOC content (minus water and with water) of each material as applied.
 - VOC emission calculations determining the volume-weighted average VOC content of the coatings as applied on a daily basis.
 - Tert-butyl acetate emissions calculations determining the daily average emission rate in lb/8-hr.
- The following calendar monthly records for EUAutoPlasCoatLn:
 - Gallons of each DBE (CAS 95481-62-2) containing material used and reclaimed.
 - DBE (CAS 95481-62-2) content of each material as applied.
 - DBE (CAS 95481-62-2) mass emission calculations determining the monthly emission rate in pounds per calendar month.

- DBE (CAS 95481-62-2) mass emission calculations determining the annual emission rate in pounds per 12-month rolling time period as determined at the end of each calendar month.
- The following records for EUAutoPlasCoatLn kept on a calendar month basis:
 - Gallons of each VOC, acetone (CAS 67-64-1), and tert-butyl acetate (CAS 540-88-5) containing material used and reclaimed.
 - VOC, acetone (CAS 67-64-1), and tert-butyl acetate (CAS 540-88-5) content of each material as applied.
 - VOC, acetone (CAS 67-64-1), and tert-butyl acetate (CAS 540-88-5) mass emission calculations determining the monthly emission rate in tons per calendar month.
 - VOC, acetone (CAS 67-64-1), and tert-butyl acetate (CAS 540-88-5) mass emission calculations determining the annual emission rate in tons per 12-month rolling time period as determined at the end of each calendar month.
 - VOC mass emission calculations determining the monthly emission rate in tons per calendar month.
 - VOC mass emission calculations determining the annual emission rate in tons per 12-month rolling time period as determined at the end of each calendar month.
 - VOC, acetone, and tert-butyl acetate combined mass emissions calculations determining the monthly emission rate in tons per calendar month.
 - VOC, acetone, and tert-butyl acetate combined mass emission calculations determining the annual emission rate in tons per 12-month rolling time period as determined at the end of each calendar month.
- Records of the cure temperature for EUAutoPlasCoatLn **for the months of January 2020 and September 2020.**

FGIMCPULINES1&2

- Inspection and operating records from the weekly inspections operation of the fabric filters used for particulate control in each spray booth associated with FG-IMCPULINES1&2, except for EU-1MOLDRELEASE, EU-1MASKSTATION, EU-2MOLDRELEASE, and EU-2MASKSTATION.
- Current listing from the manufacturer of the chemical composition of each material (coating, mold release, cleanup solvent, etc.), including the weight percent of each component.
- The following monthly records for each coating line within FG-IMCPULINES1&2:
 - Gallons (with water) of each material (i.e. coating, mold release, cleanup solvent, etc.) used.
 - VOC content (minus water and with water) of each material (i.e. coating, mold release, cleanup solvent, etc.) as applied.
 - Gallons of cleanup solvent reclaimed.
 - VOC mass emission calculations determining the monthly emission rate in tons per calendar month for IMC/PU Systems 1 and 2 individually and combined for both IMC/PU Systems within FG-IMCPULINES1&2.
 - VOC mass emission calculations determining the annual emission rate in tons per 12-month rolling time period as determined at the end of each calendar month for IMC/PU Systems 1 and 2 individually and combined for both IMC/PU Systems within FG-IMCPULINES1&2.

FGIMCPULINES3

- Inspection and operating information records from the weekly inspections of the fabric filters used for particulate control in each spray booth associated with FG-IMCPULINES3, except for EU-3MOLDRELEASE and EU-3MASKSTATION.
- Current listing from the manufacturer of the chemical composition of each material (coating, mold release, cleanup solvent, etc.), including the weight percent of each component.
- The following daily records for each coating line in FG-IMCPULINES3:
 - Gallons (with water) of each material (i.e. coating, mold release, cleanup solvent, etc.) used.
 - VOC content (minus water and with water) of each material (i.e. coating, mold release, cleanup solvent, etc.) as applied.
 - Gallons of cleanup/purge solvent reclaimed.
 - VOC mass emission calculations determining the monthly emission rate in tons per calendar month for all coating lines combined within FG-IMCPULINES3.
 - VOC mass emission calculations determining the annual emission rate in tons per 12-month rolling time period as determined at the end of each calendar month for all coating lines combined within FG-IMCPULINES3.

FG-MACT-ZZZZ-EMERGENCY RICE

- For each CI engine, records of the occurrence and duration of each malfunction of operation (i.e. process equipment) or the air pollution control and monitoring equipment.
- Records of all required maintenance performed on the air pollution control and monitoring equipment.
- Records of actions taken during periods of malfunction to minimize emissions in accordance with 40 CFR 63.6605(b), including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation.
- Records to show continuous compliance with each emission or operating limit that applies.
- Records of the maintenance conducted on the stationary RICE in order to demonstrate that the permittee operated and maintained the stationary RICE and after-treatment control device (if any) according to the permittee's maintenance plan.
- Records of the hours of operation of the engine that is recorded through the non-resettable hour meter. Records must document how many hours are spent for emergency operation, including what classified the operation as emergency and how many hours are spent for non-emergency operation.

FG-BOILERMACT

- A copy of each notification and report that the permittee submitted to comply with 40 CFR Part 63, Subpart DDDDD, including all documentation supporting any Initial Notification of Compliance Status or semiannual compliance report that the permittee submitted.
- Records of performance tests, fuel analyses, or other compliance demonstrations and performance evaluations as required in 40 CFR 63.10(b)(2)(viii).

FG-RULE287(2)(C)

- The following records for each emission unit in FG-RULE287(2)(c) for each calendar month:
 - Volume of coating used, as applied, minus water, in gallons.
 - For emission units installed on or after December 20, 2016, documentation of any filter replacements or maintenance of water wash control for exhaust systems serving coating spray equipment or other documentation included in a plan developed by the owner or operator of the equipment. For emission units installed before December 20, 2016, documentation that the exhaust system that serves only coating spray equipment is supplied with a properly installed and operating particulate control system.

FG-RULE290

- The following records for each emission unit in FG-RULE290 for each calendar month:
 - Records identifying each air contaminant that is emitted.
 - Records identifying if each air contaminant is controlled or uncontrolled.
 - Records identifying if each air contaminant is either carcinogenic or non-carcinogenic.
 - Records identifying the ITSL and IRSL, if established, of each air contaminant that is being emitted under the provisions of Rules 290(2)(a)(ii) and (iii).
 - Records of material use and calculations identifying the quality, nature, and quantity of the air contaminant emissions in sufficient detail to demonstrate that the actual emissions of the emission unit meet the emission limits outlined in the permit and in Rule 290.
- The facility inventory of each emission unit that is exempt pursuant to Rule 290. This inventory shall include:
 - A written description of each emission unit as it is maintained and operated throughout the life of the emission unit.
 - For each emission unit that emits noncarcinogenic particulate air contaminants pursuant to Rule 290(2)(a)(iii), the permittee shall maintain a written description of the control device, including the designed control efficiency and the designed exhaust gas flow rate.
- Records of the monthly visible emission observations conducted for each emission unit that emits noncarcinogenic particulate air contaminants pursuant to Rule 290(2)(a)(iii).

FG-COLDCLEANERS

- The following information for each cold cleaner:
 - A serial number, model number, or other unique identifier for each cold cleaner
 - The date the unit was installed, manufactured, or that it commenced operation
 - The air/vapor interface area for any unit claimed to be exempt under Rule 281(2)(h)
 - The applicable Rule 201 exemption
 - The Reid vapor pressure of each solvent used
 - If applicable, the option chosen to comply with Rule 707(2).

The requested records were received from Leslie on December 8, 2020. These included:

- Emergency engine test and performance records. These records appear to show compliance with the permit requirements
- A spreadsheet that shows the daily use (lb/day), daily gallons less exempt, daily VOC content less exempt, daily tBA emissions, daily average tBA emission rate (lb/8-hours), and material content information for each material used for EUAUTOPLASCOATLN.
 - As stated above, these records show that no exceedances of the 5 lb VOC/gal (minus water) since August the end of August 2020. The last reported exceedance occurred on August 30, 2020.
 - These records also show that the facility appears to be in compliance with the daily Tert-butyl acetate (tBA)(CAS No. 540-88-5) emission limit.
- A spreadsheet showing the monthly cure oven temperature averages for 2020. The records show that the facility stays below the permit limit of 194 degrees F.
- A document outlining the recordkeeping information for the emission units operating under a Rule 290 exemption. This information includes what air contaminant is emitted, a statement indicating that all air contaminants emitted are noncarcinogenic VOCs and noncarcinogenic materials listed in Rule 122(f), the ITSL and IRSL of each air contaminant emitted, and records of the material use and calculations identifying the quality, nature, and quantity of the air contaminant emissions. Additionally, the facility reports that EUGlueRobot is the one unit they are currently operating under a Rule 290 exemption, and, based on the air contaminants emitted, the emission unit is exempt pursuant to Rule 290(2)(a)(i). Overall, the records supplied appear to show compliance with the recordkeeping requirements of Rule 290.
- A document showing the monthly and 12-month rolling emissions for VOC, VOC/acetone/tBA combined, and DBE.
 - VOC emission records show that the facility is staying well below their permitted limit of 36.0 tpy per 12-month rolling time period. The facility currently reports 17.0 tpy.
 - The VOC/acetone/tBA emission records show that the facility is well below the permitted limit of 54.0 tpy per 12-month rolling time period. The facility currently reports 26.3 tpy. NOTE: VOC/acetone/tBA did not have a combined emission limit until the issuance of PTI 35-13A in June 2020.
 - The DBE emission records show that the facility is below the permitted limit of 2,899 lb/year per 12-month rolling time period. The facility currently reports 1,475 lb/yr. NOTE: DBE did not have a permitted emission limit until the issuance of PTI 35-13A in June 2020.

Records for FGIMCPULINES1&2, FGIMCPULINES3, and FGRULE287(2)(c) were not included in the submission because these units have not been used since 2019 and Leslie and Stephanie confirmed that they have been removed.

Overall, the records appear to show compliance with the required monitoring and recordkeeping requirements. Additionally, other than the reported exceedances of the daily lb VOC/gal limit for EUAUTOPLASCOATLN, the records appear to show compliance with the permitted emission limits.

-MAERS Review

Faurecia reports to the Michigan Air Emissions Reporting System (MAERS) as a source fee category B. According to the facility's MAERS report, it is operating at only a fraction of permitted emission limits. For reporting year 2019 the facility reported the following emissions:

- CO – 8.45 tpy
- NOx – 10.23 tpy
- PM 10 – 0.76 tpy
- SO2 – 0.07 tpy
- VOC – 28.40 tpy

Overall, 2019 MAERS shows compliance.

Post-Inspection Meeting

After the facility observation I met with Leslie, Stephanie, Jeff, and Amanda for a brief post-inspection meeting. The only outstanding compliance issue remains the exceedance of the 5 pounds of VOCs/gallon daily limit for EU-AUTOPLASCOATLN. As stated before, I requested that the company continue to submit monthly progress reports on this issue until fully resolved.

I informed them of the report that will be generated once the record review has been completed. I explained that, once my supervisor approves it, they will be sent a copy of the report from our secretary.

I thanked the Faurecia staff for their time and corporation and ended the meeting at 10:18 AM.

Compliance Summary

Based upon the inspection and review of the records, Faurecia Saline appears to be in compliance except for the outstanding issue of the exceedances of their 5 pounds of VOCs/gallon daily paint limit for EU-AUTOPLASCOATLN. A VN has already been issued for this emission exceedance. It appears that the facility is working towards resolution of this issue, and they have been in compliance with the limit since August 31, 2020. Monthly updates will be submitted by the company until the issue is considered fully resolved.



Image 1(1) : Aerial view

NAME Stephen Weems

DATE 12/09/2020

SUPERVISOR [Signature]