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

B206362031

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:** 03/02/2022
STAFF: Stephanie Weems	**COMPLIANCE STATUS:** Compliance	**SOURCE CLASS:** MAJOR
SUBJECT: Scheduled inspection for FY22.		
RESOLVED COMPLAINTS:		

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

Facility Contact

Leslie Wiggins-HSE Manager

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Phone: 734-328-4224

Purpose

On March 2, 2022 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 December 9, 2020 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. To resolve this violation, the facility was working on changing to lower VOC/water-based coatings and they were continuing to shift the solvent based coatings to water-based coatings. This VN was considered resolved on February 18, 2021 when Faurecia's records demonstrated that they hadn't had a VOC exceedance since August of 2020.

On October 12, 2021 Faurecia was issued a VN for nonsubmittal of the Semi-annual Monitoring and Deviation Report. This VN was considered resolved on November 9, 2021 when the report was received.

During the last inspection it was confirmed that FG-IMCPULINES1&2, FG-IMCPULINES3, FG-RULE 287(2)(c), and EU-WetWellPump have been removed.

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

Arrival & Facility Contact

I started the Microsoft Teams Meeting at 9:26 AM and was joined by Leslie Wiggins, Stephanie Jarrett (facility consultant), and Kyle Ledzianowski (Faurecia HSE Coordinator).

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.

The facility currently employs approximately 1060 people with 968 usually present on site. They operate 24 hours a day, Monday through Friday. Leslie explained that they do operate most Saturdays but not with a full staff. Additionally, they do operate the occasional Sunday night when demand warrants it.

I asked if there had been any changes at the facility since the last inspection. Leslie explained that some assembly lines had been decommissioned and some glue and paint processes might leave this facility. Leslie said she would keep us updated if any changes occur. EU-AUTOPLASCOATLN is now the only source of significant emissions remaining at the facility.

Additionally, we discussed the facility's upcoming ROP renewal. I explained that this renewal has been assigned to AQD's newly formed ROP Central Unit, and I explained that any correspondence about the renewal will come from them.

Leslie let us know that she did have to join another meeting for a brief second at 10 AM so she would be disconnecting and rejoining after.

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. Once we established which units were to be viewed, Kyle went out to the floor and called in from each area to show the respective processes.

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. She did state that one of the boilers is not functional. Leslie stated that Faurecia may not

replace this unit because it was rarely used. We did not observe the boilers during this inspection.

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 by the facility 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-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). Isaiah joined the call to show me the glue booth robots. I was able to see that the unit had filters installed. Isaiah informed me that the filters on these units are change two times a day.

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.

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. We did not observe any of these units but previous inspection reports indicate that they are equipped with a non-resettable hour meters.

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 again joined by Isaiah to view this line. This line is completely enclosed and automated. Isaiah and Kyle showed me some sections of this line, and I was able to

see that the filter panels were installed. Isaiah stated that the box filters are replaced once a week and the large bag filters are replaced every two weeks.

Recordkeeping/Permit Requirements Review

On January 21, 2022 the following record request document was sent to Leslie via email:

RECORD REQUEST

ALL RECORDS REQUESTED FROM JANUARY 2021 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 roling 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 February 2021 and September 2021.**
  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-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).
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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).

These records were received from Faurecia on February 11, 2022.

Attachment 1 is the coating composition and emission records for EUAUTOPLASCOATLN. These records appear to show that the facility is meeting the 12-month rolling VOC emission limit, the 12-month rolling VOC, Acetone, and Tert-butyl acetate combined emission limit, and the 12-month rolling Dibasic Esters emission limit. Additionally, these records appear to show compliance with the daily emission limits for VOC and Tert-butyl acetate.

Attachment 2 is the cure oven temperature records for February 2021 and September 2021. These records appear to show compliance with the recordkeeping requirement as well as showing that the facility is keeping the temperature of the ovens within the range limit needed for the coatings to be considered air-dried.

Attachment 3 is the run time and maintenance records for the emergency generators at the facility. These records appear to show compliance with the run time limits set under the federal standard.

Attachment 4 is the most recent tune-up and certification records for the facility's boilers as required by 40 CFR Part 63, Subpart DDDDD. These records appear to show compliance.

Attachment 5 is the SDS for the solvent that the facility uses in their coldcleaners. This shows that the Reid vapor pressure of the solvent is 0.0001 mm Hg.

Attachment 6 is the Rule 290 records as required by their ROP for FG-RULE290. These records appear to show compliance.

Overall, the records appear to show compliance with the required monitoring and recordkeeping requirements. Additionally, 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 2020 the facility reported the following emissions:

- CO – 6.38 tpy
- NOx – 7.86 tpy
- PM 10 – 0.57 tpy
- SO2 – 0.07 tpy
- VOC – 20.67 tpy

Overall, 2020 MAERS shows compliance.

Post-Inspection Meeting

After the facility observation I met with Stephanie and Kyle for a brief post-inspection meeting. Leslie had disconnected to join her other meeting.

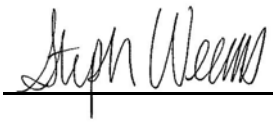
I informed them of the report that will be generated once the record review has been completed. I explained that, once my supervisor approves it, they will be sent a copy of the report from our secretary.

Additionally, since this was the first AQD inspection that Kyle participated in I explained that, traditionally, these would be conducted in person and we would take a complete tour of the facility. During this tour, an explanation of the facility's processes would be given, and all processes would be observed. I told Stephanie and Kyle that they should expect the next scheduled inspection to be conducted in person.

I thanked the Faurecia staff for their time and corporation and ended the meeting at 10:04 AM.

Compliance Summary

Based upon the inspection and review of the records, Faurecia Saline appears to be in compliance at the time of this inspection.

NAME  DATE 3/2/22 SUPERVISOR