

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

B242954717

FACILITY: FAURECIA INTERIOR SYSTEMS		SRN / ID: B2429
LOCATION: 17801 EAST FOURTEEN MILE RD, FRASER		DISTRICT: Warren
CITY: FRASER		COUNTY: MACOMB
CONTACT: Daryl Gurunian , HSE Manager		ACTIVITY DATE: 03/11/2020
STAFF: Joe Forth	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: On-site Inspection		
RESOLVED COMPLAINTS:		

On March 11, 2020, AQD staff Joseph Forth conducted an inspection of Faurecia Interior Systems (Faurecia), located at 17801 East 14 Mile Road in Fraser, Michigan. The purpose of this inspection was to determine the facility's compliance with the federal Clean Air Act, Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended, and the conditions of Permit to Install (PTI) No. 15-12A.

Faurecia manufactures vehicle interiors. Door panels and center consoles are created through reaction injection molding. These parts can be colored during reaction molding, coated in a coating booth, or sprayed with an adhesive so a thin vinyl sheet can be applied to the part. Seats are not manufactured at this facility. The company typically operates 3 shifts 24 hours for 7 days a week. Currently Faurecia has approximately 500 employees at the facility.

During the inspection I met with David Jaworski and Daryl Gurunian, HSE Managers. Both Mr. Jaworski and Mr. Gurunian are relatively new to the position. I discussed with them the permit, what is expected of them regarding recordkeeping and operational requirements. We then went on an inspection of the facility. During the inspection, it was discovered that one of the exhaust stacks for the glue lines had a rain cap on it, I advised Mr. Jaworski that this was in violation of Section VII of FGCOATLINES in PTI No. 15-12A and it would need to be removed. Mr. Jaworski assured they would have it removed (I received evidence on July 1st, 2020 of the removal of the rain cap).

There are approximately 23 plastic injection machines at the facility. Plastic pellets of many types are heated and pushed into the molds. Often, a small amount of a colored pellets are added to bring color to the molded parts. The machines are enclosed and appear to emit to the general in-plant environment. The plastic injection machines appear to be exempt from permitting requirements per R 286(2)(b). Stoner Rocket Release (Rocket Release) is the mold release agent. It is applied via 8 oz aerosol cans. The MSDS is available in the manila file folder. According to the SDS, there are no hazardous air pollutants (HAPs) in Rocket Release. This mold release application appears to be exempt from permitting requirements via R 287(2)(b). Rule 287(2)(b) allows a surface coating process that uses only hand-held aerosol spray cans/containers not exceeding 8 ounces in size to be exempt from permitting. AQD has requested Faurecia to keep track of the usage of the release agent. If the usage is deemed substantial enough, Faurecia may need to modify their permit to include the process.

Soon after the completion of the in-person inspection of the Faurecia facility, the Michigan Governor's executive stay at home order was issued for Michigan, and Mr. Jaworski and Mr. Gurunian's time in the facility became intermittent and this led to a delay in submitting all required records. Due to these extenuating circumstances relating to COVID-19 pandemic, AQD will not be issuing a violation to Faurecia for this deviation.

Compliance

PTI No. 15-12A

All records were provided electronically and are located at: S:\Air Quality Division\STAFF\Joe Forth\B2429 Faurecia Interior Systems FY20 Inspection

Special Conditions

FGCOATLINES

I.1 VOC emission limit of 45 tons per year (12-month rolling time period). From August 2019 through July 2020, Faurecia emitted 13.95 tons of VOC from FGCOATLINES.

I.2 Acetone emission limit of 1 ton per year (12-month rolling time period). From August 2019 through

July 2020, Faurecia emitted no Acetone from FGCOATLINES, the facility's current production process does not utilize acetone.

I.3 Tert-butyl acetate emission limit of 17.5 tons per year (12-month rolling time period). From August 2019 through July 2020, Faurecia emitted 3.44 tons of tert-butyl Acetate from FGCOATLINES.

I.4 Ethylene oxide emission limit of 0.35 pounds per year. From August 2019 through July 2020, Faurecia emitted no ethylene oxide from FGCOATLINES, the facility's current production process does not utilize ethylene oxide.

I.5 Tripropylene glycol monomethyl ether emission limit of 8.2 tons per year. From August 2019 through July 2020, Faurecia emitted no Tripropylene glycol monomethyl ether from FGCOATLINES.

II.1 VOC material limit of 4.2 lb/gal (minus water) as applied. The facility was granted approval to use manufacturer's formulation data to show compliance with this condition. The facility provided formulation direct from the supplier for the coating material used in FGCOATLINES showed that the coating contains 0.65 pounds VOC per gallon minus exempt solvents.

III.1 The permittee only uses tert-butyl acetate in EUCOATLINE4.

III.2 The permittee captures all waste material and stores them in closed containers. The waste is disposed of using a waste disposal company. A manifest for waste disposal was provided.

III.3 The permittee replaces spent filters daily and disposes of them using a waste disposal company.

III.4 All VOC and HAP containing materials and stored with covers affixed except when being actively used for operation requirements.

IV.1 All coating and glue lines appeared to have filters properly installed.

IV.2 The water wall for EUCOATINGLINE4 appeared to be operating properly at the time of inspection.

IV.3 All booths in FGCOATILINES are equipped with High-Volume Low-Pressure applicators.

V.1 The facility received approval from the AQD to use manufacturer formulation instead of EPA Method 24 analysis to determine compliance for VOC containing materials used in FGCOATLINES.

VI.1 Due to extenuating circumstances relating to COVID-19 pandemic, a violation notice (VN) will not be sent for late submittal of records. All records for FGCOATLINES appear to have been provided.

VI.2 The permittee appears to be maintaining current listing of manufacturer's formulation data/SDS for all materials used in FGCOATLINES.

VI.3 a. Usage of VOC containing materials in gallons was provided.

b. The permittee does not reclaim any VOC containing material.

c. The permittee keeps record of the VOC content (minus and with water) of each material used in FGCOATLINES.

d. VOC mass emission calculations determining monthly emission rates in tons per month were provided.

e-f. VOC mass emission calculations determining the annual emission rate in tons per 12-month rolling timer period were provided.

VI.4 a. Records of the amount, in gallons, of acetone, ethylene oxide, and tripopylene glycol monomethyl ether used in FGCOATLINES were provided.

b. The permittee does not reclaim any amount of acetone, ethylene oxide, or tripopylene glycol monomethyl ether.

c. The permittee keeps and provided information detailing the contents of acetone, ethylene oxide, and tripopylene glycol monomethyl ether in each material used in FGCOATLINES.

d. Acetone monthly emission calculations were provided. Despite the usage of acetone being 0, the facility provided the document used to calculate the emissions.

- e-f. Acetone 12-month rolling emission time period calculations were provided.
- g-i. Ethylene oxide monthly and 12-month rolling time period calculations were provided.
- j-l. Tripropylene glycol monomethyl ether monthly and 12-month rolling time period calculations were provided.

VI.5. a. Gallons of tert-butyl acetate containing materials used were provided.

b. The facility does not reclaim any tert-butyl acetate containing materials.

c. Tert-butyl acetate content of each material used was provided.

d-e. Tert-butyl acetate monthly and 12-month rolling time period calculations were provided.

VIII. One of the stacks for the coating line was equipped with a rain cap, Faurecia provided photo evidence of the cap having been removed on July 1st, 2020. All other exhaust stacks appeared to be unobstructed.

FGFACILITY

I.1 No individual HAP exceeds the 9.0 tpy emission limit for individual HAPs.

I.2 Aggregate HAPs for August 2019 through July 2020 totaled at 531 pounds emitted, below the emission limit of 22.5 tons per year.

V.1 The facility received approval from the AQD to use manufacturer formulation instead of EPA Method 311 analysis to determine compliance for VOC containing materials used in FGCATLINES.

VI.1 Due to extenuating circumstances relating to COVID-19 pandemic, a VN will not be sent for late submittal of records. All records for FGFACILITY appear to have been provided.

VI.2. Gallons of HAP containing materials used were provided.

b. The facility does not reclaim any HAP containing materials.

c. HAP content of each material used was provided.

d-e. Monthly and 12-month rolling time period calculations for HAP containing materials were provided.

NSPS Dc Boiler

Faurecia has a natural gas fired boiler on site for space heating. The unit is located in a separate building outside the main building. Later, Mr. Jaworski provided a picture of the nameplate because we were unable to view the boiler during the inspection due to maintenance staff being unavailable to unlock the boiler room. The boiler did not appear to be in operation; the boiler is partially outside the building and was ambient temperature during our inspection. According to Mr. Jaworski, the boiler is not used during warm weather.

The boiler appears to be subject to 40 CFR Part 60 Subpart Dc. The boiler heat input capacity is 20.9 MMBtu and its date of start-up was July of 2006 according to the Initial Notification and Information form received from Faurecia on February 9, 2009, located in the AQD manila file folder. Because the boiler does not burn coal or oil, the main requirement is "to record and maintain records of the total amount of each steam generating unit fuel delivered to that property during each calendar month" per §60.48c(g) (3). Fuel consumption and emission records were provided.

Conclusion

Faurecia Interior Systems Inc. appears to be in compliance with the federal Clean Air Act, Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended, and the conditions of Permit to Install (PTI) No. 15-12A.

NAME John M. Smith DATE 9-28-20 SUPERVISOR Sebastian Kallumkal