



RICK SNYDER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
SAGINAW BAY DISTRICT OFFICE



C. HEIDI GREYER  
DIRECTOR

December 19, 2018

Mr. Paul Fielding  
Lear Corporation EEDS & Interiors - Renosol Seating Facility  
505 Hoover Street  
Farwell, Michigan 48622

SRN: B7294, Clare County

Dear Mr. Fielding:

**VIOLATION NOTICE**

On November 30, 2018, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of Lear Corporation EEDS & Interiors - Renosol Seating Facility located at 505 Hoover Street, Farwell, Michigan. The purpose of this inspection was to determine Lear Corporation EEDS & Interiors - Renosol Seating Facility's compliance with the requirements of the federal Clean Air Act; Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451); the Air Pollution Control Rules; and the conditions of Renewable Operating Permit (ROP) number MI-ROP-B7294-2018;

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
Molded polyurethane automotive seating production (FGFOAMLINES)	Special Condition II.1	The mold release (Chem-Trend PU-11379) used on EUSMALLPARTS#1 has a VOC content of 6.22 lb VOC/gal (minus water) as applied, which is over the permit limit of 6.15 lb VOC/gal (minus water) as applied.
	Special Condition V.1	The facility has not verified the VOC content, water content, or density of mold release agent PU-11379 using Federal Reference Test Method 24. The facility has not received prior written approval from the AQD District Supervisor to use the manufacturer's formulation data instead.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by January 9, 2019 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the violations occurred; an explanation of the causes and duration of the violations; whether

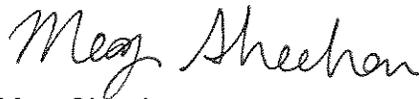
the violations are ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violations and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

Please submit the written response to the DEQ, AQD, Saginaw Bay District, at 401 Ketchum Street, Suite B, Bay City, Michigan 48708 and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at the DEQ, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Lear Corporation EEDS & Interiors - Renosol Seating Facility believes the above observations or statements are inaccurate or do not constitute violations of the applicable legal requirements cited, please provide appropriate factual information to explain your position.

Thank you for your attention to resolving the violations cited above and for the cooperation that was extended to me during my inspection of Lear Corporation EEDS & Interiors - Renosol Seating Facility. If you have any questions regarding the violations or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,



Meg Sheehan  
Environmental Quality Analyst  
Air Quality Division  
989-439-5001  
sheehanm@michigan.gov

cc: Ms. Mary Ann Dolehanty, DEQ  
Dr. Eduardo Olaguer, DEQ  
Mr. Christopher Ethridge, DEQ  
Ms. Jenine Camilleri, DEQ  
Mr. Chris Hare, DEQ  
Mr. Joshua Axline, Lear Corporation