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Michigan Department of Environment, Great Lakes, and Energy
Air Quality Division
301 E. Louis Glick Highway
Jackson, Michigan, 49201

May 3, 2019

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AIR QUALITY DIVISION

Subject: Violation Notice 4/12/19

Facility: Faurecia Interior Systems Saline, LLC (FIS-Saline)
Saline, Michigan

ROP No.: MI-ROP-B2063-2018

Conditions: I.4 Daily VOC Emission Limit EUAUTOPLASCOATLN
VI.3a & c Daily records of Usage and VOC emissions

Comments: Daily VOC limit exceeded. Recordkeeping requirements not met.

Non-compliance Period: July 2017 to current

Cause: In July 2017, the plastic parts coating line material usage shifted from primarily waterborne paints to primarily solvent-based paints. At that time the plant EHS personnel were only downloading material usages from the waterborne paint line computer. Plant EHS personnel did not realize that solvent based paint data was stored on two more computer terminals, one for each paint robot. When this discrepancy was found in February 2019, data from the solvent-based systems for 2018 had been written over and is unavailable. EHS personnel have attempted to calculate 2018 daily usage data based on parts painted and purchasing records. Based on this calculation methodology, FIS-Saline appears not to have met the daily VOC limit of 5 lb/gal (less exempt liquids) for the current mix of waterborne and solvent-based paints. We believe the majority of days painted in 2018 exceeded the daily VOC limit. However, FIS-Saline's monthly VOC calculations continue to demonstrate compliance with 12-month rolling VOC limits.

Actions Taken: Data collection using pictures of the computer screens began February 18, 2019 and continued consistently through March 28, 2019. At that time, the process to automate recordkeeping disrupted data collection. Recordkeeping requirements were not completed from March 29 through April 11 and April 13 through April 18 while the automation was implemented. The computer data has generated usage reports consistently since 4/18/19. The

usage data for both waterborne and solvent-based paints is maintained on a separate server so they will not be overwritten. Faurecia is now in full compliance with the recordkeeping requirement.

To address the daily VOC limit violation, the facility has changed the production plan to insource a part that is coated with waterborne paints and outsource a part that requires solvent-based paint. This new waterborne product line has received all required approvals and begins production this month. Faurecia will remain out of compliance with the 5.0 pounds/gallon limit until the new product line is fully launched.

Conditions: FG-MACT-ZZZ-EMERGENCY RICE VI.2, VI.5; 40 CFR Part 63, Subpart ZZZ; 40 CFR 63.6655; 40 CFR 63.6660

Comments: Recordkeeping requirements not met.

Non-compliance Period: 2018

Cause: Maintenance records, including oil change records, for the fire pumps and emergency RICE have not been located. Previous maintenance manager verbally indicated maintenance had been performed. FIS is continuing to look for the documentation.

Actions Taken: Maintenance requirements have been identified and provided to new maintenance personnel. Maintenance requirements for 2019 were completed on April 9, 2019 and records have been maintained.

Conditions: FG-BOILERMACT VI.1a; 40 CFR Part 63, Subpart DDDDD; 40 CFR 63.7555

Comments: Recordkeeping requirements not met.

Non-compliance Period: 2018

Cause: Energy Assessment and NOCS records have not been located. Boiler tune-ups have been performed in accordance with CSD-1; however CO and O2 records have not been found. It does not appear that the annual compliance reports have been submitted to the EGLE or CEDRI.

Actions Taken: Maintenance requirements have been identified and provided to new maintenance personnel. A contract for the Energy Assessment has been issued. Once the energy assessment is completed the NOCS will be submitted. The annual compliance reports covering 2018 have been submitted to the EGLE and CEDRI.

Sincerely,

Melissa Hall
HSE Manager – Saline
Faurecia Interior Systems

cc: Ms. Jenine Camilleri, Enforcement Unit Supervisor, EGLE – AQD
Mr. Sebastien Guery, Faurecia Interior Systems - Saline
Mr. Jeff Sedgwick, Faurecia Interior Systems – NAO