



November 6, 2020

Ms. Stephanie Weems
Environmental Quality Analyst
Air Quality Division
Michigan Department of Environment, Great Lakes & Energy
301 East Louis Glick Highway
Jackson, MI 49201

Re: Response to Violation Notice, dated September 30, 2020
Faurecia Interior Systems. (SRN: N2063)
Saline, Michigan

Dear Ms. Weems:

Faurecia Interiors Systems Saline, LLC. (FIS-Saline) has prepared this letter in response to the Michigan Department of Environment, Great Lakes & Energy (EGLE) Violation Notice (VN) dated September 30, 2020. The VN alleges that FIS-Saline violated the following Special Conditions (SC) related to Renewable Operating Permit (ROP) MI-ROP-B2063-2018 and Permit to Install (PTI) No. 35-13A:

Process Description	Rule/Permit Condition Violated	Comments
EUAUTOPLASCOATLN	MI-ROP-B2063-2018 EUAUTOPLASCOATLN Condition I.4	<i>Daily VOC limit exceeded</i>
	PTI 35-13A EUAUTOPLASCOATLN Condition I.5	

As requested, this letter provides information regarding the referenced citations, including:

- an explanation of the causes and duration of the alleged violation,
- a summary of the actions that have been taken, and/or are proposed to be taken, to correct the violation,
- the date(s) by which these actions will take place,
- what steps are being taken to prevent a reoccurrence.

As you are aware, FIS-Saline has struggled to meet the daily VOC emission limits for the EUAUTOPLASCOATLN. We have been working diligently to coordinate and schedule parts to balance the daily solvent based and water-based coatings usage to meet the 5 lb/gal less water daily limit. We have brought more water-based paints to the plant to balance out the solvent based paints. Unfortunately, the original equipment manufacturers (OEMs) have final say in the coatings applied to their parts, and it takes a significant amount of time to adjust coatings and ensure the OEMs quality objectives.



During the 1st half 2020, FIS-Saline was shut down from March 21st to May 12th due to the Governors Stay at Home Orders for COVID-19. When we returned to operation in May we had a limited amount of parts to be supplied to the OEMs. Due to this, we had to fill supply orders based on what the OEMs requested as their operations ramped back up following COVID. In July 2020, supply chains and orders started to stabilize and FIS-Saline was able to again balance workload. There were no exceedances of the daily limit in July 2020.

In August 2020, we had 3 dates that exceeded the 5 lb/gal less water, however we do not believe these will be considered deviations once shift operations as allowed by PTU 35-13A are taken into account. We are still working on a mechanism to split the emissions and usages by shift. Currently these calculations need to be done by hand:

- Friday 8/7/2020. On this day – only 2.82 gallons of coating were used, total VOCs for the day were 7.83 lbs and the line operated for less than hour. The daily VOC content for 8/7/2020 was 5.3 lb/gal less water. As we described in our PTI application 35-13A there are days that the coating line operates (typically weekends) for a limited amount of time in order to make up for parts that were rejected or did not get painted during the week. This makes it difficult on low usage days to meet the daily average VOC contents, as the coatings used on these days are based on parts. Our permit does allow us to average shifts or daily. If we were to include the 16 hours of operation on the coating line for 8/6/2020, our VOC content averages to 3.69 lb/gal less water, which is compliant.
- Sunday 8/23/2020. On this day – only 1.13 gallons of coating were used, total VOCs for the day were 3.32 lbs and the line operated for a little over two hours. The daily VOC content for 8/23/2020 was 5.4 lb/gal less water. As this was a Sunday, the shift start occurred late Sunday night, and additional operational time would have occurred due to startup and purge. On Monday 8/24/2020 we operated for almost 24 hours. If we were to include the 24 hours of operation on the coating line for 8/24/2020, our VOC content averages to 4.49 lb/gal less water, which is compliant.
- Sunday 8/30/2020. On this day – only 8.11 gallons of coating were used, total VOCs for the day were 25.71 lbs and the line operated almost 2.5 hours. The daily VOC content for 8/30/2020 was 5.3 lb/gal less water. As this was a Sunday, the shift start occurred late Sunday night, and additional operational time would have occurred due to startup and purge. On Monday 8/31/2020 we operated for almost 24 hours. If we were to include the 24 hours of operation on the coating line for 8/30/2020, our VOC content averages to 4.76 lb/gal less water, which is compliant.

There have been no exceedances during September 2020 and the 1st half of October 2020, which is the date our current records are updated through. As you can see, now that operation has stabilized again, FIS-Saline has been able to balance workload to meet our current limits and we are working diligently so that the 2nd half of 2020 will not show any exceedances of the daily VOC limits.



FIS-Saline is continuing to try to shift the solvent based coatings to water based coatings. As we indicated, this takes time since we need to demonstrate compliance with OEMs quality requirements. FIS has also started research on an RTO. As you know, the coating line is centrally located in our plant so installation cost of the RTO may not make it feasible to install. We will keep the AQD informed should an RTO be feasible.

We continue our commitment to working with EGLE resolve this violation. If you have any questions or require additional information, please contact me at 734-328-4224.

Sincerely,

A handwritten signature in black ink that reads "Leslie Wiggins".

Leslie Wiggins, HSE Manager

Faurecia Interior Systems

By email

cc: Ms. Jenine Camilleri – EGLE
Stephanie A. Jarrett, PE – Fishbeck
Lynn M. Spurr – Fishbeck
Jeff Sedgwick, Director HSE & Medical