



Lear Corporation  
Farwell Facility  
505 Hoover Street  
PO Box 249  
Farwell, MI 48622

Michigan Department of  
Environment, Great Lakes, and Energy  
Bay City District Office – Air Quality Division  
C/O: Gina L. McCann  
401 Ketchum St. Suite B  
Bay City, MI 48708

**ROP No:** MI-ROP-B7294-2018  
**PTI No:** MI-PTI-B7294-2018  
**ROP Exp. Date:** 2023-09-05  
**SRN:** B7294

April 21, 2021

Dear Ms. McCann,

This letter responds to the Violation Notice letter dated April 5, 2021 transmitted to Lear by the Department of Environment, Great Lakes and Energy (EGLE), Air Quality Division (AQD) following its inspection of the Farwell Plant on March 3, 2021. The alleged violation is based on the Company's Emission Tracking worksheet data indicating the 12-month rolling average VOC emissions exceeded the 60.0 tons per year limit for the EUCANNONLINE (SL#3) process.

After a review of the worksheet we confirmed that the permitted 60.0 tpy rolling average emission rate was slightly exceeded in March, April, May, August and September of 2019. Our data review revealed that no other permit limits were exceeded before or after these dates. The exceedance was not immediately apparent and identified because the 12-month rolling average is not an instantaneous value related to a specific production volume. It is a result of the cumulative production volume over the 12 months. Also, the plant EHS person had left the company during that period of time.

Lear Corporation, Farwell has implemented the following corrective measures to address (1) the volume of production and emissions that allowed this exceedance of 12-month rolling average, and (2) the late identification of the permit limit exceedance:

1. Monthly reviews of the 12-month rolling average values will be held with the Plant Manager by the 15<sup>th</sup> of the month. Any values reaching 90% of the limit will be discussed to determine appropriate steps to address the production level projections for the current month to prevent exceedance of the Permit limits.



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2. Identification of any exceedance of permit limitations will result in notification of the AQD immediately with actions taken to reduce emissions before the following month.
3. Plant engineering is evaluating a lower VOC content mold release product to determine the feasibility of substituting it for the current material. Results of this investigation will be communicated to the AQD upon completion.

Lear Corporation is committed to compliance with all regulations and permit requirements and will work with EGLE AQD to remain compliant with our Permit limitation. Please let me know if you have any questions or concerns.

Sincerely,

**Lear Corporation**

A handwritten signature in cursive script that reads 'Paul Fielding'.

**Paul Fielding**

Plant Manager, Farwell Plant

CC: Kathleen Kelly, EHS Lear Farwell  
Doug Andrews, EHS Lear Corporate  
Mike Walkowski, Lear Foam Operations Director  
Jenine Camilleri, Enforcement Unit Supervisor EGLE AQD  
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