

**MICHIGAN DEPARTMENT OF ENVIRONMENT, GREAT LAKES, AND ENERGY
AIR QUALITY DIVISION**

June 3, 2020

**PERMIT TO INSTALL
35-13A**

ISSUED TO
Faurecia Interior Systems Saline, LLC

LOCATED AT
7700 East Michigan Avenue
Saline, Michigan 48176

IN THE COUNTY OF
Washtenaw

STATE REGISTRATION NUMBER
B2063

The Air Quality Division has approved this Permit to Install, pursuant to the delegation of authority from the Michigan Department of Environment, Great Lakes, and Energy. This permit is hereby issued in accordance with and subject to Section 5505(1) of Article II, Chapter I, Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended. Pursuant to Air Pollution Control Rule 336.1201(1), this permit constitutes the permittee's authority to install the identified emission unit(s) in accordance with all administrative rules of the Department and the attached conditions. Operation of the emission unit(s) identified in this Permit to Install is allowed pursuant to Rule 336.1201(6).

| | |
|---|------------|
| DATE OF RECEIPT OF ALL INFORMATION REQUIRED BY RULE 203: April 13, 2020 | |
| DATE PERMIT TO INSTALL APPROVED: June 3, 2020 | SIGNATURE: |
| DATE PERMIT VOIDED: | SIGNATURE: |
| DATE PERMIT REVOKED: | SIGNATURE: |

PERMIT TO INSTALL

Table of Contents

COMMON ACRONYMS 2
POLLUTANT / MEASUREMENT ABBREVIATIONS..... 3
GENERAL CONDITIONS 4
EMISSION UNIT SPECIAL CONDITIONS..... 6
 EMISSION UNIT SUMMARY TABLE 6
 EUAUTOPLASCOATLN..... 7

COMMON ACRONYMS

| | |
|----------------------------|---|
| AQD | Air Quality Division |
| BACT | Best Available Control Technology |
| CAA | Clean Air Act |
| CAM | Compliance Assurance Monitoring |
| CEMS | Continuous Emission Monitoring System |
| CFR | Code of Federal Regulations |
| COMS | Continuous Opacity Monitoring System |
| Department/department/EGLE | Michigan Department of Environment, Great Lakes, and Energy |
| EU | Emission Unit |
| FG | Flexible Group |
| GACS | Gallons of Applied Coating Solids |
| GC | General Condition |
| GHGs | Greenhouse Gases |
| HVLP | High Volume Low Pressure* |
| ID | Identification |
| IRSL | Initial Risk Screening Level |
| ITSL | Initial Threshold Screening Level |
| LAER | Lowest Achievable Emission Rate |
| MACT | Maximum Achievable Control Technology |
| MAERS | Michigan Air Emissions Reporting System |
| MAP | Malfunction Abatement Plan |
| NA | Not Applicable |
| NAAQS | National Ambient Air Quality Standards |
| NESHAP | National Emission Standard for Hazardous Air Pollutants |
| NSPS | New Source Performance Standards |
| NSR | New Source Review |
| PS | Performance Specification |
| PSD | Prevention of Significant Deterioration |
| PTE | Permanent Total Enclosure |
| PTI | Permit to Install |
| RACT | Reasonable Available Control Technology |
| ROP | Renewable Operating Permit |
| SC | Special Condition |
| SCR | Selective Catalytic Reduction |
| SDS | Safety Data Sheet |
| SNCR | Selective Non-Catalytic Reduction |
| SRN | State Registration Number |
| TBD | To Be Determined |
| TEQ | Toxicity Equivalence Quotient |
| USEPA/EPA | United States Environmental Protection Agency |
| VE | Visible Emissions |

*For HVLP applicators, the pressure measured at the gun air cap shall not exceed 10 psig

POLLUTANT / MEASUREMENT ABBREVIATIONS

| | |
|-------------------|--|
| acfm | Actual cubic feet per minute |
| BTU | British Thermal Unit |
| °C | Degrees Celsius |
| CO | Carbon Monoxide |
| CO ₂ e | Carbon Dioxide Equivalent |
| dscf | Dry standard cubic foot |
| dscm | Dry standard cubic meter |
| °F | Degrees Fahrenheit |
| gr | Grains |
| HAP | Hazardous Air Pollutant |
| Hg | Mercury |
| hr | Hour |
| HP | Horsepower |
| H ₂ S | Hydrogen Sulfide |
| kW | Kilowatt |
| lb | Pound |
| m | Meter |
| mg | Milligram |
| mm | Millimeter |
| MM | Million |
| MW | Megawatts |
| NMOC | Non-Methane Organic Compounds |
| NO _x | Oxides of Nitrogen |
| ng | Nanogram |
| PM | Particulate Matter |
| PM10 | Particulate Matter equal to or less than 10 microns in diameter |
| PM2.5 | Particulate Matter equal to or less than 2.5 microns in diameter |
| pph | Pounds per hour |
| ppm | Parts per million |
| ppmv | Parts per million by volume |
| ppmw | Parts per million by weight |
| psia | Pounds per square inch absolute |
| psig | Pounds per square inch gauge |
| scf | Standard cubic feet |
| sec | Seconds |
| SO ₂ | Sulfur Dioxide |
| TAC | Toxic Air Contaminant |
| Temp | Temperature |
| THC | Total Hydrocarbons |
| tpy | Tons per year |
| µg | Microgram |
| µm | Micrometer or Micron |
| VOC | Volatile Organic Compounds |
| yr | Year |

GENERAL CONDITIONS

1. The process or process equipment covered by this permit shall not be reconstructed, relocated, or modified, unless a Permit to Install authorizing such action is issued by the Department, except to the extent such action is exempt from the Permit to Install requirements by any applicable rule. **(R 336.1201(1))**
2. If the installation, construction, reconstruction, relocation, or modification of the equipment for which this permit has been approved has not commenced within 18 months, or has been interrupted for 18 months, this permit shall become void unless otherwise authorized by the Department. Furthermore, the permittee or the designated authorized agent shall notify the Department via the Supervisor, Permit Section, Air Quality Division, Michigan Department of Environment, Great Lakes, and Energy, P.O. Box 30260, Lansing, Michigan 48909-7760, if it is decided not to pursue the installation, construction, reconstruction, relocation, or modification of the equipment allowed by this Permit to Install. **(R 336.1201(4))**
3. If this Permit to Install is issued for a process or process equipment located at a stationary source that is not subject to the Renewable Operating Permit program requirements pursuant to Rule 210 (R 336.1210), operation of the process or process equipment is allowed by this permit if the equipment performs in accordance with the terms and conditions of this Permit to Install. **(R 336.1201(6)(b))**
4. The Department may, after notice and opportunity for a hearing, revoke this Permit to Install if evidence indicates the process or process equipment is not performing in accordance with the terms and conditions of this permit or is violating the Department's rules or the Clean Air Act. **(R 336.1201(8), Section 5510 of Act 451, PA 1994)**
5. The terms and conditions of this Permit to Install shall apply to any person or legal entity that now or hereafter owns or operates the process or process equipment at the location authorized by this Permit to Install. If the new owner or operator submits a written request to the Department pursuant to Rule 219 and the Department approves the request, this permit will be amended to reflect the change of ownership or operational control. The request must include all of the information required by subrules (1)(a), (b), and (c) of Rule 219 and shall be sent to the District Supervisor, Air Quality Division, Michigan Department of Environment, Great Lakes, and Energy. **(R 336.1219)**
6. Operation of this equipment shall not result in the emission of an air contaminant which causes injurious effects to human health or safety, animal life, plant life of significant economic value, or property, or which causes unreasonable interference with the comfortable enjoyment of life and property. **(R 336.1901)**
7. The permittee shall provide notice of an abnormal condition, start-up, shutdown, or malfunction that results in emissions of a hazardous or toxic air pollutant which continue for more than one hour in excess of any applicable standard or limitation, or emissions of any air contaminant continuing for more than two hours in excess of an applicable standard or limitation, as required in Rule 912, to the Department. The notice shall be provided not later than two business days after start-up, shutdown, or discovery of the abnormal condition or malfunction. Written reports, if required, must be filed with the Department within 10 days after the start-up or shutdown occurred, within 10 days after the abnormal conditions or malfunction has been corrected, or within 30 days of discovery of the abnormal condition or malfunction, whichever is first. The written reports shall include all of the information required in Rule 912(5). **(R 336.1912)**
8. Approval of this permit does not exempt the permittee from complying with any future applicable requirements which may be promulgated under Part 55 of 1994 PA 451, as amended or the Federal Clean Air Act.
9. Approval of this permit does not obviate the necessity of obtaining such permits or approvals from other units of government as required by law.
10. Operation of this equipment may be subject to other requirements of Part 55 of 1994 PA 451, as amended and the rules promulgated thereunder.

11. Except as provided in subrules (2) and (3) or unless the special conditions of the Permit to Install include an alternate opacity limit established pursuant to subrule (4) of Rule 301, the permittee shall not cause or permit to be discharged into the outer air from a process or process equipment a visible emission of density greater than the most stringent of the following. The grading of visible emissions shall be determined in accordance with Rule 303 (R 336.1303). **(R 336.1301)**
 - a) A six-minute average of 20 percent opacity, except for one six-minute average per hour of not more than 27 percent opacity.
 - b) A visible emission limit specified by an applicable federal new source performance standard.
 - c) A visible emission limit specified as a condition of this Permit to Install.
12. Collected air contaminants shall be removed as necessary to maintain the equipment at the required operating efficiency. The collection and disposal of air contaminants shall be performed in a manner so as to minimize the introduction of contaminants to the outer air. Transport of collected air contaminants in Priority I and II areas requires the use of material handling methods specified in Rule 370(2). **(R 336.1370)**
13. The Department may require the permittee to conduct acceptable performance tests, at the permittee's expense, in accordance with Rule 1001 and Rule 1003, under any of the conditions listed in Rule 1001. **(R 336.2001)**

EMISSION UNIT SPECIAL CONDITIONS

EMISSION UNIT SUMMARY TABLE

The descriptions provided below are for informational purposes and do not constitute enforceable conditions.

| Emission Unit ID | Emission Unit Description (Including Process Equipment & Control Device(s)) | Installation Date / Modification Date | Flexible Group ID |
|-------------------------------|--|--|--------------------------|
| EUAutoPlasCoatLn ^a | Automotive Interior Plastic Parts Coating Line: The coating line includes an adhesion promotion flame cell, CO ₂ cleaning booth, destat booth, two robotic applicators within a single coating booth, flash-off tunnel, and associated natural gas-fired cure oven. The air-dried coatings will be water-based and solvent-based paints, and water or solvent will be used for purge and cleanup. This emission unit includes a parts wipe station with in-plant emissions. | 9/5/2013 | FG-MACTPPPP |

Changes to the equipment described in this table are subject to the requirements of R 336.1201, except as allowed by R 336.1278 to R 336.1291.

^a Please see MI-ROP-B2063-2018 for other emission units and flexible groups associated with this facility.

**EUAUTOPLASCOATLN
 EMISSION UNIT CONDITIONS**

DESCRIPTION

Automotive Interior Plastic Parts Coating Line: The coating line includes an adhesion promotion flame cell, CO₂ cleaning booth destat booth, two robotic applicators within a single coating booth, flash-off tunnel, and associated natural gas-fired cure oven. The air-dried coatings will be water-based and solvent-based paints, and water or solvent will be used for purge and cleanup. This emission unit includes a parts wipe station with in-plant emissions.

Flexible Group ID: NA

POLLUTION CONTROL EQUIPMENT

Filter panels to control particulate matter

I. EMISSION LIMIT(S)

| Pollutant | Limit | Time Period / Operating Scenario | Equipment | Monitoring / Testing Method | Underlying Applicable Requirements |
|---|--|--|--|------------------------------------|---|
| 1. VOCs | 36.0 tpy | 12-month rolling time period as determined at the end of each calendar month | Coatings, purge, and cleanup portion of EUAutoPlasCoatLn | SC VI.1, SC VI.5 | 336.1702(a) |
| 2. VOCs, Acetone, and Tert-butyl acetate combined | 54.0 tpy | 12-month rolling time period as determined at the end of each calendar month | Coatings, purge, and cleanup portion of EUAutoPlasCoatLn | SC VI.1, SC VI.5 | R 336.1224, R 336.1702(a) |
| 3. Tert-butyl acetate (CAS No. 540-88-5) | 550 lb/8-hr ¹ | Daily | EUAutoPlasCoatLn | SC VI.3 | R 336.1225(1) |
| 4. Dibasic Esters (CAS No. 95481-62-2) | 2,899 lb/yr | 12-month rolling time period as determined at the end of each calendar month | Coatings, purge, and cleanup portion of EUAutoPlasCoatLn | SC VI.4 | R 336.1225(1) |
| 5. VOCs | 5.0 lb/gal (minus water) ^a as applied | Daily volume-weighted average. | EUAutoPlasCoatLn | SC V.1, SC VI.3 | R 336.1702(d) |

^a The phrase "minus water" shall also include compounds which are used as organic solvents and which are excluded from the definition of volatile organic compound. **(R 336.1602(4))**

^b Daily is defined as calendar day or the shifts comprising a facility work day.

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall recover and reclaim, recycle, or dispose of all coatings, paints, reducer, thinners, and purge and clean up solvents, etc. (materials) used for EUAutoPlasCoatLn, in accordance with all applicable regulations. **(R 336.1224, R 336.1702(a))**

2. The permittee shall capture all waste materials and shall store them in closed containers. The permittee shall dispose of all waste materials in an acceptable manner in compliance with all applicable state rules and federal regulations. **(R 336.1224, R 336.1702(a))**
3. The permittee shall dispose of spent filters in a manner which minimizes the introduction of air contaminants to the outer air. **(R 336.1224, R 336.1370)**
4. The permittee shall handle all VOC and / or HAP containing materials, in a manner to minimize the generation of fugitive emissions. The permittee shall keep containers covered at all times except when operator access is necessary. **(R 336.1224, R 336.1702(a))**
5. The permittee shall not operate the cure oven portion of EUAutoPlasCoatLn at a temperature in excess of 194°F. **(R 336.1702(d))**

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall not operate EUAutoPlasCoatLn unless all respective exhaust filters are installed, maintained, and operated in a satisfactory manner. **(R 336.1224, R 336.1301, R 336.1910)**
2. The permittee shall equip and maintain EUAutoPlasCoatLn with HVLP applicators or comparable technology with equivalent transfer efficiency. For HVLP applicators, the permittee shall keep test caps available for pressure testing. **(R 336.1702(a))**
3. The permittee shall install, calibrate, maintain, and operate in a satisfactory manner a device to monitor and record the cure oven temperature on a continuous basis. For the purposes of this condition, "on a continuous basis" is defined as a data point recorded at least once every 15 minutes. **(R 336.1702(d))**

V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years. **(R 336.1201(3))**

1. The permittee shall determine the VOC content, water content and density of any coating, as applied and as received, using federal Reference Test Method 24. Upon prior written approval by the AQD District Supervisor, the permittee may determine the VOC content from manufacturer's formulation data. If the Method 24 and the formulation values should differ, the permittee shall use the Method 24 results to determine compliance. **(R 336.1702, R 336.2001, R 336.2003, R 336.2004, R 336.2040(5))**

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. **(R 336.1201(3))**

1. The permittee shall complete all required calculations in a format acceptable to the AQD District Supervisor by the 30th day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition. **(R 336.1224, R 336.1225, R 336.1702)**
2. The permittee shall maintain a current listing from the manufacturer of the chemical composition of each material, including the weight percent of each component. The data may consist of Safety Data Sheets, manufacturer's formulation data, or both as deemed acceptable by the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request. **(R 336.1224, R 336.1225, R 336.1702)**

3. The permittee shall keep the following information on a calendar day or workday basis for EUAutoPlasCoatLn:
- Gallons (with water) of each VOC and tert-butyl acetate containing material used and reclaimed.
 - VOC content (minus water and with water) of each material as applied.
 - VOC emission calculations determining the volume-weighted average VOC content of the coatings as applied on a daily basis.
 - Tert-butyl acetate emissions calculation determine the daily average emission rate in lb/8-hr.

The records shall be kept using mass balance or in an alternate method and format acceptable to the AQD District Supervisor. All records shall be kept on file and made available to the Department upon request.¹
(R 336.1225(1), R 336.1702(d))

4. The permittee shall keep the following information on a calendar month basis for EUAutoPlasCoatLn:
- Gallons of each DBE (CAS 95481-62-2) containing material used and reclaimed.
 - DBE (CAS 95481-62-2) content of each material as applied.
 - DBE (CAS 95481-62-2) mass emission calculations determining the monthly emission rate in pounds per calendar month.
 - DBE (CAS 95481-62-2) mass emission calculations determining the annual emission rate in pounds per 12-month rolling time period as determined at the end of each calendar month.

The records shall be kept using mass balance or in an alternate method and format acceptable to the AQD District Supervisor. All records shall be kept on file and made available to the Department upon request.¹
(R 336.1225(1))

5. The permittee shall keep the following information on a calendar month basis for EUAutoPlasCoatLn:
- Gallons of each VOC, acetone (CAS No. 67-64-1), and tert-butyl acetate (CAS No. 540-88-5) containing material used and reclaimed.
 - VOC, acetone (CAS No. 67-64-1), and tert-butyl acetate (CAS No. 540-88-5) content of each material as applied.
 - VOC, acetone (CAS No. 67-64-1), and tert-butyl acetate (CAS No. 540-88-5) mass emission calculations determining the monthly emission rate in tons per calendar month.
 - VOC, acetone (CAS No. 67-64-1), and tert-butyl acetate (CAS No. 540-88-5) mass emission calculations determining the annual emission rate in tons per 12-month rolling time period as determined at the end of each calendar month.
 - VOC mass emission calculations determining the monthly emission rate in tons per calendar month.
 - VOC mass emission calculations determining the annual emission rate in tons per 12-month rolling time period as determined at the end of each calendar month.
 - VOC, acetone, and tert-butyl acetate combined mass emissions calculations determining the monthly emission rate in tons per calendar month.
 - VOC, acetone, and tert-butyl acetate combined mass emission calculations determining the annual emission rate in tons per 12-month rolling time period as determined at the end of each calendar month.

The records shall be kept using mass balance or in an alternate method and format acceptable to the AQD District Supervisor. All records shall be kept on file and made available to the Department upon request.¹
(R 336.1224, R 336.1702)

6. The permittee shall monitor and record the cure oven temperature on a continuous basis. The permittee shall keep, in a satisfactory manner, continuous records of the cure temperature for EUAutoPlasCoatLn. For the purposes of this condition, "on a continuous basis" is defined as a data point recorded at least once every 15 minutes. **(R 336.1702(d))**

VII. REPORTING

1. Within 30 days after completion of the installation, construction, reconstruction, relocation, or modification authorized by this Permit to Install, the permittee or the authorized agent pursuant to Rule 204, shall notify the AQD District Supervisor, in writing, of the completion of the activity. Completion of the installation, construction, reconstruction, relocation, or modification is considered to occur not later than commencement of trial operation of EUAutoPlasCoatLn. **(R 336.1201(7)(a))**

VIII. STACK/VENT RESTRICTION(S)

The exhaust gases from the stacks listed in the table below shall be discharged unobstructed vertically upwards to the ambient air unless otherwise noted:

| Stack & Vent ID | Maximum Exhaust Diameter / Dimensions (inches) | Minimum Height Above Ground (feet) | Underlying Applicable Requirements |
|--------------------------------------|---|---|---|
| 1. SVAutoPlasCoatLn-01 (Spray Booth) | 16 | 50 | R 336.1225, R 336.1901, R 336.2803, R 336.2804, 40 CFR 52.21(c) & (d) |
| 2. SVAutoPlasCoatLn-02 (Cure Oven) | 18.0 | 50 | R 336.1225, R 336.1901, R 336.2803, R 336.2804, 40 CFR 52.21(c) & (d) |

IX. OTHER REQUIREMENT(S)

NA

Footnotes:

¹ This condition is state only enforceable and was established pursuant to Rule 201(1)(b).