

Michigan Department of Environmental Quality
Air Quality Division

State Registration Number
B2063

**RENEWABLE OPERATING PERMIT
STAFF REPORT**

ROP Number
MI-ROP-B2063-2018

**Faurecia Interior Systems Saline, LLC
and
Ford Motor Company - Saline Plant**

SRN: B2063

Located at

7700 Michigan Avenue, Saline, Washtenaw, Michigan 48176

Permit Number: MI-ROP-B2063-2018

Staff Report Date: April 23, 2018

This Staff Report is published in accordance with Sections 5506 and 5511 of Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451). Specifically, Rule 214(1) requires that the Michigan Department of Environmental Quality (MDEQ), Air Quality Division (AQD), prepare a report that sets forth the factual basis for the terms and conditions of the Renewable Operating Permit (ROP).

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RENEWABLE OPERATING PERMIT

APRIL 23, 2018 STAFF REPORT

Purpose

Major stationary sources of air pollutants, and some non-major sources, are required to obtain and operate in compliance with an ROP pursuant to Title V of the federal Clean Air Act of 1990 and Michigan's Administrative Rules for Air Pollution Control pursuant to Section 5506(1) of Act 451. Sources subject to the ROP program are defined by criteria in Rule 211(1). The ROP is intended to simplify and clarify a stationary source's applicable requirements and compliance with them by consolidating all state and federal air quality requirements into one document.

This Staff Report, as required by Rule 214(1), sets forth the applicable requirements and factual basis for the draft ROP terms and conditions including citations of the underlying applicable requirements, an explanation of any equivalent requirements included in the draft ROP pursuant to Rule 212(5), and any determination made pursuant to Rule 213(6)(a)(ii) regarding requirements that are not applicable to the stationary source.

General Information

Stationary Source Mailing Address:	Faurecia Interior Systems Saline, LLC 7700 Michigan Avenue Saline, Michigan 48176
Source Registration Number (SRN):	B2063
North American Industry Classification System (NAICS) Code:	336360
Number of Stationary Source Sections:	2
Is Application for a Renewal or Initial Issuance?	Renewal
Application Number:	201600185
Responsible Official Section 1: (Faurecia Interior Systems, LLC)	Glen Dozier, Plant Manager 734-429-6900
Responsible Official Section 2: (Ford Motor Company – Saline Plant)	Andrew Hobbs, Director, Environmental Quality Office 313-845-5802
AQD Contact:	Zack Durham, Environmental Quality Analyst 517-780-7851
Date Application Received:	November 18, 2016
Date Application Was Administratively Complete:	November 18, 2016
Is Application Shield In Effect?	Yes
Date Public Comment Begins:	April 23, 2018
Deadline for Public Comment:	May 23, 2018

Source Description

Faurecia Interior Systems Saline, LLC is located at 7700 Michigan Avenue, on the east side of the City of Saline. The plant has been in operation at this site under various different owners since 1966, including Ford, Visteon, Automotive Components Holdings, and now Faurecia. The surrounding area is a mix of commercial, light industrial, and residential. There are also some nearby wetlands in close proximity to the facility.

The Saline plant is a manufacturer of instrument panels, consoles, and other miscellaneous plastic parts that are used to assemble the interiors of cars and trucks. The components at the plant are formed using plastic injection molding processes. Plastic parts are also coated on site, which are applied to components in coating lines or paint booths contained in the plant. Water-based coatings are primarily used in their processes, which begins to explain the very low reporting of Hazardous Air Pollutants (HAPs). The option to shift away from solvent-based paints that are high in VOC and HAP was a decision the company made to maintain compliance with a source category regulation in 40 CFR Part 63, Subpart PPPP for coating plastic parts. Filter panels are also used to control particulate matter from the coating lines. In addition to their other equipment, the plant has two natural gas-fired steam boilers.

The second section of the ROP was added to include remediation activities being conducted by Ford Motor Company through the use of several soil vapor extraction (SVE) units. The SVE units are controlled by a series of activated carbon adsorption filters before being exhausted to atmosphere. The remediation sites selected are from historic use of the property as an industrial manufacturing facility, and not the result of the current plant operation. The SVE units have demonstrated compliance with Rule 291 and are no longer required to be listed in the ROP, however, Section 2 will remain as general conditions.

The following table lists stationary source emission information as reported to the Michigan Air Emissions Reporting System (MAERS) for the year **2016**.

TOTAL STATIONARY SOURCE EMISSIONS

Pollutant	Tons per Year
Carbon Monoxide (CO)	3.64
Lead (Pb)	0
Nitrogen Oxides (NO _x)	10.38
Particulate Matter (PM)	1.67
Sulfur Dioxide (SO ₂)	0.078
Volatile Organic Compounds (VOCs)	33.69

The following table lists Hazardous Air Pollutant emissions as calculated for the year 2016 by AQD:

Individual Hazardous Air Pollutants (HAPs) **	Tons per Year
Acetaldehyde	0.001
Formaldehyde	0.004
Hexane	0.045
Total Hazardous Air Pollutants (HAPs)	0.05

**As listed pursuant to Section 112(b) of the federal Clean Air Act.

See Parts C and D in the ROP for summary tables of all processes at the stationary source that are subject to process-specific emission limits or standards.

Regulatory Analysis

The following is a general description and history of the source. Any determinations of regulatory non-applicability for this source are explained below in the Non-Applicable Requirement part of the Staff Report and identified in Part E of the ROP.

The stationary source is located in Washtenaw County, which is currently designated by the U.S. Environmental Protection Agency (USEPA) as attainment/unclassified for all criteria pollutants.

The stationary source is subject to Title 40 of the Code of Federal Regulations (CFR) Part 70, because the potential to emit of volatile organic compounds (VOC) exceeds 100 tons per year, and the potential to emit of any single HAP regulated by the federal Clean Air Act, Section 112, is equal to or more than 10 tons per year and/or the potential to emit of all HAPs combined is equal to or more than 25 tons per year.

No emission units at the stationary source are currently subject to the Prevention of Significant Deterioration regulations of Part 18, Prevention of Significant Deterioration of Air Quality of Act 451, because at the time of New Source Review permitting the potential to emit of each criteria pollutant was less than 250 tons per year.

EU-11MCPU1, EU-11MCPU2, EU-11MCPU3, EU-21MCPU1, EU-21MCPU2, EU-21MCPU3, EU-31MCPU1, EU-31MCPU2, EU-31MCPU3, and EUAutoPlasCoatLn at the stationary source are subject to the National Emission Standard for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products promulgated in 40 CFR Part 63, Subparts A and PPPP. The source chooses to comply with Subpart PPPP using the compliant materials option within the subpart. Even though the facility is considered a major source of HAPs, by choosing the compliant materials option the actual HAP emissions, from the coating processes, are very minimal.

EU-Pump612, EU-Pump613, EU-Pump614, EU-WetWellPump, and EU-Generac at the stationary source are subject to the National Emission Standard for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines promulgated in 40 CFR Part 63, Subparts A and ZZZZ.

The following emission units have been dismantled and removed as of the writing of this ROP: EU-202-00-, EU-223-95, EU-670-78A, and EU-159-74A.

The in-mold coating (IMC) lines consist of a series of automated and manual processes that are combined to mold, coat, and cure a final product in one work area. These lines use polyurethane (PU) in the injection molding process to create the interior part the machine is tooled for. Molded parts are simultaneously coated with the desired color and sent through a flash-off booth and curing booth.

EUAutoPlasCoatLn is being added to Section 1 of the ROP (Faurecia) from Permit to Install (PTI) No. 35-13. This emission unit is for a coating line that has the capability of using both water and solvent-based coatings. It is equipped with two robotic applicators as well as a flash-off tunnel and curing oven. The coating booth is equipped with filters to control particulate matter from overspray.

PTI No. 199-16 was issued before the issuance of this ROP. The emission units contained in PTI No. 199-16 are for two (2) SVE units in Section 2 of the ROP (Ford) identified as EU-OU-4 and EU-OU-6. This PTI also modified the language in the Special Condition V.1 under "Testing/Sampling" for what is considered breakthrough as it pertains to the activated carbon system. This PTI will not be rolled into the ROP because all SVE units onsite have demonstrated that they meet the criteria of Rule 291, including EU-OU-4, EU-OU-5, EU-OU-6, and EU-OU-17, at the time of writing. Instead, any active PTIs for remaining SVEs have been voided prior to issuance of this ROP. Equipment subject to Rule 291 is not required to be listed in the ROP, and EPA agrees with this determination from AQD.

The monitoring conditions contained in the ROP are necessary to demonstrate compliance with all applicable requirements and are consistent with the "Procedure for Evaluating Periodic Monitoring Submittals." This includes maintaining records required by Subpart PPPP that demonstrates the source is in compliance with their chosen method of compliance.

No emission units have emission limitations or standards that are subject to the federal Compliance Assurance Monitoring rule under 40 CFR Part 64, because all emission units at the stationary source either do not have a control device or those with a control device do not have potential pre-control emissions over the major source thresholds. The coating lines at the stationary source are equipped with filters to control particulate matter from spray booths. Stack testing was used to set emission limits on PM2.5 and PM10 from emission units during NSR permitting. EU-223-95 was subject to the federal Compliance Assurance Monitoring (CAM) rule under 40 CFR Part 64. This emission unit has since been dismantled and removed and the CAM language removed from this ROP.

Please refer to Parts B, C and D in the draft ROP for detailed regulatory citations for the stationary source. Part A contains regulatory citations for general conditions.

Source-wide Permit to Install (PTI)

Rule 214a requires the issuance of a Source-wide PTI within the ROP for conditions established pursuant to Rule 201. All terms and conditions that were initially established in a PTI are identified with a footnote designation in the integrated ROP/PTI document.

The following table lists all individual PTIs that were incorporated into previous ROPs. PTIs issued after the effective date of ROP No. MI-ROP-B2063-2012b are identified in Appendix 6 of the ROP.

PTI Number			
253-10	126-08D	53-09	

Streamlined/Subsumed Requirements

This ROP does not include any streamlined/subsumed requirements pursuant to Rules 213(2) and 213(6).

Non-applicable Requirements

Part E of the ROP lists requirements that are not applicable to this source as determined by the AQD, if any were proposed in the ROP Application. These determinations are incorporated into the permit shield provision set forth in Part A (General Conditions 26 through 29) of the ROP pursuant to Rule 213(6)(a)(ii).

Processes in Application Not Identified in Draft ROP

The following table lists processes that were included in the ROP Application as exempt devices under Rule 212(4). These processes are not subject to any process-specific emission limits or standards in any applicable requirement.

PTI Exempt Emission Unit ID	Description of PTI Exempt Emission Unit	Rule 212(4) Citation	PTI Exemption Rule Citation
EUSMALLHEATERS	Natural gas heaters	Rule 212(4)(b)	Rule 282(2)(b)(i)
EUWASTEOILSTORAGE	Waste oil storage	Rule 212(4)(c)	Rule 284(2)(e)
EURECLAIMOILSTORAGE	Reclaim oil storage	Rule 212(4)(c)	Rule 284(2)(e)
EUGASOLINETANK	500-Gallon gasoline storage tank	Rule 212(4)(c)	Rule 284(2)(g)(i)

Draft ROP Terms/Conditions Not Agreed to by Applicant

The following table lists terms and/or conditions of the draft ROP that the AQD and the applicant did not agree upon and outlines the applicant's objections pursuant to Rule 214(2). The terms and conditions that the AQD believes are necessary to comply with the requirements of Rule 213 shall be incorporated into the ROP.

Emission Unit/ Flexible Group ID	Permit Term(s) and/or Condition(s) in Dispute	Applicant's Objection
FG-BOILERMACT		The applicant believes the language in this section is overly complicated for the facility. AQD is including this table to ensure the equipment's compliance with 40 CFR Part 63, Subpart DDDDD.

Compliance Status

The AQD finds that the stationary source is expected to be in compliance with all applicable requirements as of the effective date of this ROP.

Action taken by the MDEQ, AQD

The AQD proposes to approve this ROP. A final decision on the ROP will not be made until the public and affected states have had an opportunity to comment on the AQD's proposed action and draft permit. In addition, the USEPA is allowed up to 45 days to review the draft ROP and related material. The AQD is not required to accept recommendations that are not based on applicable requirements. The delegated decision maker for the AQD is Scott Miller, Jackson District Supervisor. The final determination for ROP approval/disapproval will be based on the contents of the ROP Application, a judgment that the stationary source will be able to comply with applicable emission limits and other terms and conditions, and resolution of any objections by the USEPA.

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JUNE 27, 2018 - STAFF REPORT ADDENDUM

Purpose

A Staff Report dated April 23, 2018, was developed in order to set forth the applicable requirements and factual basis for the draft Renewable Operating Permit (ROP) terms and conditions as required by R 336.1214(1). The purpose of this Staff Report Addendum is to summarize any significant comments received on the draft ROP during the 30-day public comment period as described in R 336.1214(3). In addition, this addendum describes any changes to the draft ROP resulting from these pertinent comments.

General Information

Responsible Official Section 1: (Faurecia Interior Systems, LLC)	Glen Dozier, Plant Manager 734-429-6900
Responsible Official Section 2: (Ford Motor Company – Saline Plant)	Andrew Hobbs, Director, Environmental Quality Office 313-845-5802
AQD Contact:	Zack Durham, Environmental Quality Analyst 517-780-7851

Summary of Pertinent Comments

No pertinent comments were received during the 30-day public comment period.

Changes to the April 23, 2018 Draft ROP

No changes were made to the draft ROP.