



GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
JACKSON DISTRICT OFFICE



LIESL EICHLER CLARK
DIRECTOR

April 12, 2019

CERTIFIED MAIL 7017 3380 0000 4105 8384
RETURN RECEIPT

Mr. Sebastian Guery, Plant Manager
Faurecia Interior Systems Saline, LLC
7700 Michigan Avenue
Saline, MI 48176

SRN: B2063, Washtenaw County

Dear Mr. Guery:

VIOLATION NOTICE

On March 15, 2019, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), received the annual compliance certification and the semi-annual report certification from Faurecia Interior Systems Saline (FIS-Saline), LLC located at 7700 Michigan Avenue, Saline, Michigan. The AQD's review of these certifications has identified non-compliance with the requirements of the federal Clean Air Act; Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451); the Air Pollution Control Rules; and the conditions of Renewable Operating Permit (ROP) number MI-ROP-B2063-2018.

During the AQD's review of the reports, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
EUAUTOPLASCOATLN	MI-ROP-B2063-2018 EUAUTOPLASCOATLN. Condition I.4, VI.3a and c.	Daily VOC limit exceeded. Recordkeeping requirements not met.
FG-MACT-ZZZZ-EMERGENCY RICE	MI-ROP-B2063-2018 FG-MACT-ZZZZ-EMERGENCY RICE Condition VI.2, VI.5; 40 CFR Part 63, Subpart ZZZZ; 40 CFR 63.6655; 40 CFR 63.6660	Recordkeeping requirements not met.
FGBOILERMACT	MI-ROP-B2063-2018 FGBOILERMACT Condition VI.1a, 40 CFR Part 63, Subpart DDDDD; 40 CFR 63.7555	Recordkeeping requirements not met.

The conditions of ROP number MI-ROP-B2063-2018 limit the emissions of VOC to 5 lb/gal (less water) daily. The records provided demonstrate that actual emissions of VOCs from the EUAUTOPLASCOATLN process equipment exceeded the daily limit.

The boilers indicated under FGBOILERMACT are subject to the federal National Emission Standards for Hazardous Air Pollutants (NESHAP) for Major Source Industrial, Commercial and Institutional Boilers and Process Heaters. These standards are found in 40 CFR Part 63, Subpart DDDDD.

The engines indicated under FG-MACT-ZZZZ-EMERGENCY RICE are also subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Reciprocating Internal Combustion Engines (RICE). These standards are found in 40 CFR Part 63, Subpart ZZZZ.

In the annual and semi-annual certifications, FIS-Saline indicated emission records are unable to be produced. This is a violation of the recordkeeping and emission limitations specified in Special Condition FGBOILERMACT VI. 1a, FG-MACT-ZZZZ-EMERGENCY RICE VI. 2 and VI. 5, and EUAUTOPLASCOATLN VI. 3a and c of ROP number MI-ROP-B2063-2018. MI-ROP-B2063-2018 require records be maintained and available for review upon request by the AQD staff.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by May 3, 2019. The written response should include: the dates the violations occurred; an explanation of the causes and duration of the violations; whether the violations are ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violations and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

Please submit the written response to the DEQ, AQD, Jackson District, at 301 E. Louis Glick Highway, Jackson, Michigan 49201 and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at the DEQ, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If FIS-Saline believes the above observations or statements are inaccurate or do not constitute violations of the applicable legal requirements cited, please provide appropriate factual information to explain your position.

Thank you for your attention to resolving the violations cited above. If you have any questions regarding the violations or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,

A handwritten signature in cursive script that reads "Stephanie Weems".

Ms. Stephanie Weems
Environmental Quality Analyst
Air Quality Division
517-416-3351

cc: Ms. Melissa Hall, Faurecia Interior Systems Saline, LLC
Ms. Mary Ann Dolehanty, DEQ
Dr. Eduardo Olaguer, DEQ
Mr. Christopher Ethridge, DEQ
Ms. Jenine Camilleri, DEQ
Mr. Scott Miller, DEQ