

DEPARTMENT OF ENVIRONMENTAL QUALITY

AIR QUALITY DIVISION

**FCE Summary Report**

<b>Facility :</b> Faurecia Interior Systems Saline, LLC	<b>SRN :</b> B2063
<b>Location :</b> 7700 MICHIGAN AVE	<b>District :</b> Jackson
	<b>County :</b> WASHTENAW
<b>City :</b> SALINE <b>State:</b> MI <b>Zip Code :</b> 48176	<b>Compliance Status :</b> Non Compliance
<b>Source Class :</b> MAJOR	<b>Staff :</b> Stephanie Weems
<b>FCE Begin Date :</b> 8/23/2019	<b>FCE Completion Date :</b> 12/9/2020
<b>Comments :</b> Facility has reported exceedances of daily VOC limit during 2020. VN issued for exceedances in September 2020 - currently unresolved. Facility is working to come back into compliance and reports no exceedances from 8/31 to 11/30.	

**List of Partial Compliance Evaluations :**

Activity Date	Activity Type	Compliance Status	Comments
12/09/2020	Off-site Inspection	Non Compliance	Scheduled, targeted, announced inspection. Conducted virtually through Microsoft Teams Meetings due to ongoing COVID-19 pandemic. Company has been out of compliance with daily VOC limit - VN issued Sept. 2020 still considered unresolved. Records show compliance with limit since August 31, 2020. Company appears to be in compliance with all other permit requirements.
11/10/2020	Meeting Notes		Meeting with Jeff Rathbun and Jenine Camelleri of AQD enforcement. Scott Miller also present. Determined permit section should be consulted to see why daily VOC limit couldn't be changed during last permit mod. Inspection planned December 2020, will discuss next steps again after inspection.
09/29/2020	Telephone Notes		Called Melissa to notify her of VN to be mailed re: daily VOC exceedances reported on ROP semi-annual cert.
09/28/2020	MACT (Part 63)	Compliance	MACT Compliance Report - 40 CFR Part 63, Subpart PPPP. Used compliant materials option. Did not switch between compliance options. Facility reports no deviations.

Activity Date	Activity Type	Compliance Status	Comments
09/28/2020	ROP Semi 1 Cert	Non Compliance	Deviation Report - Boiler tune-ups should have been completed Feb 2020. In march, when it was discovered that the tune-ups had not been completed, scheduling was delayed due to the plant being shut-down per Governer's COVID-19 Executive orders. Tune-ups began on 9/1/20. Facility also reports 38 days of noncompliance with 5lb/day VOC limit.
09/15/2020	ROP Semi 1 Cert	Compliance	Semi-Annual Compliance Cert for Section 2 - Ford - facility reports no deviations. Emailed version on 9/11 - will be sending original by postal mail. Original received by USPS 10/6.
04/03/2020	ROP Annual Cert	Compliance	ROP Report Certification rec'd 4/3/20 but rec'd in Lansing on 3/19/20. Facility reported deviations related to the daily VOC limit and boiler records. Daily VOC limit and boiler record deviations were reported during the last reporting period. Facility has submitted a permit modification to increase daily VOC limits. CO and O2 levels were not recorded during boiler tune-up. Facility has made changes to record software in order for these levels to be recorded.
04/03/2020	ROP SEMI 2 CERT	Compliance	ROP Report Certification rec'd 4/3/20 but rec'd in Lansing on 3/19/20. Facility reported deviations with records related to boiler tune-ups and VOC Daily limit. Facility has reported that CO and O2 readings were not recorded during boiler tune-up, but they report that they will add this requirement to software for completion. Facility has submitted a permit modification to increase VOC daily limits.
04/03/2020	MACT (Part 63)	Compliance	MACT Subpart PPPP Report. Facility continues to use compliant material option. Facility did not switch between compliance options during the reporting period. Facility reports no deviations for the compliance period.

Activity Date	Activity Type	Compliance Status	Comments
04/03/2020	MACT (Part 63)	Compliance	MACT Subpart DDDDD Report. Boiler tune-ups conducted 1/10/2019. CO and O2 were not recorded during tune-up. Facility indicates that they have implemented software changes to remedy this issue.
03/17/2020	MAERS	Compliance	2019 MAERS report. Audit complete.
03/17/2020	MAERS	Compliance	MAERS Report Cert received. Facility used mostly MAERS EF. Facility used mass balance calculations for VOC for EUAutoPlasCoatLn. Additional info attached. 28.4 tons of VOC reported for the source.
03/13/2020	ROP Annual Cert	Compliance	ROP Annual Cert - Section 2 Ford Motor Company. Facility reports compliance with all terms and conditions contained in the ROP.
03/13/2020	ROP SEMI 2 CERT	Compliance	ROP Semi-annual certification - Section 2 Ford Motor Company. No deviations reported.
01/23/2020	Other		Received update on EU-AutoPlasCoatLn.
12/17/2019	Other		Received update from Melissa regarding EU-AutoPlasCoatLn. Facility began limited usage of the paints with a lower VOC content. Reports that daily VOC emissions were in compliance for the entire month of November. Will send another update in January. Has submitted a permit app for new product line.
11/06/2019	Other		Received update from Melissa about EU-AutoPlasCoatLn in respect to their 5.0 lb/gal daily VOC limit. Facility had 5 days were the limit was exceeded between August 1 and October 31. AQD staff requested continued monthly reports until daily VOC limit is met.

Activity Date	Activity Type	Compliance Status	Comments
09/17/2019	ROP Semi 1 Cert	Compliance	Exceedance of daily VOC limit, unable to locate records of boiler energy assessment and NOCS, inspection and filter log records missing for IMCPULINES 1, 2, and 3. Company previously reported VOC limit exceedance in March 2019 and a VN was issued. Missing boiler records were also reported in March 2019. An energy assessment was conducted in August 2019. IMCPULINE1 has been shut down, and lines 2 & 3 dismantled, with the electronic systems removed. Therefore, inspection and filter change data is no longer available.
09/17/2019	MACT (Part 63)	Compliance	Subpart PPPP - used compliant material option. No deviations reported. Did not switch between compliance options.
09/12/2019	ROP Semi 1 Cert	Compliance	Semi-annual deviation report for Ford Motor Company-Section 2 of ROP. Company reported no deviations.

Name: Steph Weems

Date: 12/09/2020

Supervisor: 