

May 17, 2024
Project No. 240316

Stephanie Weems
Senior Environmental Quality Analyst
Jackson District Office
Air Quality Division
Michigan Department of Environment, Great Lakes, and Energy
301 East Louis Glick Highway
Jackson, MI 49201

Response to Violation Notice, dated April 19, 2024
Faurecia Interior Systems Saline, LLC (SRN: B2063)
Saline, Michigan

Dear Ms. Weems:

Faurecia Interior Systems Saline, LLC (FIS-Saline) has prepared this letter in response to the EGLE Violation Notice (VN) dated April 19, 2024. The VN alleges that FIS-Saline violated the following Special Conditions (SC) related to Renewable Operating Permit (ROP) MI-ROP-B2063-2018a:

Process Description	Rule/Permit Condition Violated	Comments
<i>EU-AutoPlasCoatLn</i>	<i>MI-ROP-B2063-2018a</i> <i>EU-AutoPlasCoatLn</i> <i>Condition I.4</i>	<i>Daily VOC limit exceeded for 26 days between August and December 2023.</i>
<i>FG-MACTPPPP</i>	<i>MI-ROP-B2063-2018a</i> <i>FG-MACTPPPP</i> <i>Condition I.1</i>	<i>Exceedance of the organic HAP emission limit for 32 days between January and November 2023.</i>

As requested, this letter provides information regarding the referenced citations, including:

- The date the alleged violations occurred.
- An explanation of the causes and duration of the alleged violation.
- Whether the violation is ongoing.
- A summary of the actions that have been taken, and/or are proposed to be taken, to correct the violation, if any.
- The date(s) by which these actions will take place.
- What steps are being taken to prevent a reoccurrence.

EU-AutoPlasCoatLn – Daily VOC Limit

In assessing the VN, FIS-Saline discovered that the semi-annual report submitted on March 15, 2024, was prepared using incomplete daily average VOC content values. The water-based paint usage records, which are recorded in a separate electronic system, were inadvertently not included in daily average VOC content calculations. Once the daily water-based paint usages are properly accounted for in the calculations, the results confirm that the facility only exceeded its VOC content limits on the two days shown in the table below. Attached is the revised Daily VOC compliance summary for second half of 2023 for your records.

Date	Daily VOC Content less exempt (lb/gal less exempt)	In compliance (less than 5 lb/gal less exempt)
8/19/2023	5.9	NO
8/28/2023	5.1	NO

After investigating the erroneous calculations, we have determined that the error was caused by two factors— 1) turnover in compliance personnel and 2) maintaining the records for water- and solvent-based paints in separate recording systems, which resulted in confusion regarding how to pull the records and apply the appropriate calculations to demonstrate compliance. To address these issues, Faurecia plans the following corrective actions:

- The engineering team is working to determine how to transfer all the paint usage records onto one system which will retain the usages for at least 5 years.
- The facility EHS team will download and evaluate the usage records for compliance with the daily VOC limit more often than monthly for at least 6 months.
- Corporate EHS or an assignee (such as third-party consultant) will review records monthly for at least 6 months.
- The paint engineering team has been provided with a water-based to solvent based ratio to maintain the daily VOC limit. This ratio will be reviewed and updated periodically as needed.
- Training that addresses the calculation method to demonstrate compliance with the VOC limit in Condition I.4 will be provided to personnel involved in preparing these calculations.

FG-MACTPPPP – Compliant HAP Coating

The semi-annual report submitted on March 15, 2024, contained a deviation for using a coating that may not be a compliant coating under 40 CFR Part 63 Subpart PPPP. Although Faurecia has been using compliant coatings to ensure compliance, Subpart PPPP allows a facility to switch compliance options during the reporting period and report the switch on semiannual reports. Compliance options under 40 CFR Part 63 Subpart PPPP include:

- Use of compliant coatings and non-HAP containing cleanup solvents
- Monthly averaging of HAPs and solids to demonstrate compliance with the 0.16 lb HAP/lb solid
- Use of a control device

Below are the 12-month rolling averages, which demonstrate compliance for all of 2023.

Month	MONTHLY HAP EMISSIONS (lb/mo)	MONTHLY SOLIDS APPLIED (lb/mo)	12-MO ROLLING, LB HAP/LB SOLID	Compliant (<0.16 lb HAP/lb Solid) Yes/No
Jan 2023	78.33	2,282.80	0.03	YES
Feb 2023	73.94	2,118.53	0.03	YES
Mar 2023	95.32	2,385.19	0.04	YES
Apr 2023	68.41	2,001.89	0.04	YES

Month	MONTHLY HAP EMISSIONS (lb/mo)	MONTHLY SOLIDS APPLIED (lb/mo)	12-MO ROLLING, LB HAP/LB SOLID	Compliant (<0.16 lb HAP/lb Solid) Yes/No
May 2023	85.61	2,150.33	0.04	YES
Jun 2023	70.69	1,107.35	0.04	YES
Jul 2023	52.03	934.76	0.04	YES
Aug 2023	80.16	802.16	0.04	YES
Sep 2023	52.76	756.39	0.04	YES
Oct 2023	56.24	682.19	0.04	YES
Nov 2023	44.43	809.29	0.05	YES
Dec 2023	40.99	598.71	0.05	YES

Faurecia believes compliant coatings are being used at the facility, but has had difficulty obtaining the actual HAP content in lieu of a range from the supplier. As a result, the deviation report was based on the upper range of HAP content from the supplier. After receiving the VN, Faurecia contacted Dhake to obtain the actual pounds of HAP per pound of solids from Satin Silver Twilight MC363NP-R to ensure we are using the correct formulation data. Until we have confirmation from the supplier that Satin Silver Twilight MC363NP-R is a compliant coating, Faurecia will continue to use the monthly HAP averaging compliance option. An updated 40 CFR Part 63 Subpart PPPP compliance report is attached.

UPDATED CERTIFICATION

Attached is an updated Title V Certification for 2023. Please note, Faurecia has had a change in plant managers since March 15th, and a new plant manager has signed the certification.

Faurecia is committed to working with EGLE to ensure compliance with all environmental regulatory requirements. Faurecia is working diligently to ensure it is keeping correct coating records and is committed to resolving these deviations as soon as possible.

If you have any questions or require additional information, please contact me at 248.602.8365.

Sincerely,

FAURECIA INTERIOR SYSTEMS SALINE, LLC



James Hankins
USA Regional Manager - Health, Safety, Environment & Medical

By email and UPS

Copy: Jenine Camilleri – EGLE
Scott Miller – EGLE
Stephanie A. Jarrett, PE – Fishbeck