

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: On-site Inspection

B206373184

FACILITY: Faurecia Interior Systems Saline, LLC		SRN / ID: B2063
LOCATION: 7700 MICHIGAN AVE, SALINE		DISTRICT: Jackson
CITY: SALINE		COUNTY: WASHTENAW
CONTACT: Debora Romero , HSE Manager 2024		ACTIVITY DATE: 08/21/2024
STAFF: Stephanie Weems	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MAJOR
SUBJECT: On-site inspection conducted as required for FY24.		
RESOLVED COMPLAINTS:		

Major Source Inspection (PCE) and Full Compliance Evaluation (FCE) for Faurecia Interior Systems Saline, LLC

Facility Contact

Debora Romero -HSE Manager

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Purpose

On August 21, 2024 I conducted an unannounced compliance inspection of Faurecia Interior Systems Saline, LLC located in Saline, Michigan in Washtenaw County. The purpose of the inspection was to determine the facility's compliance status with the applicable federal and state air pollution regulations, particularly Michigan Act 451, Part 55, Air Pollution Control Act and administrative rules, the company's Renewable Operating Permit (ROP) No. MI-ROP-B2063-2018 and Permit to Install (PTI) 35-13A.

Facility Location

The facility is in Saline in a commercial area. Residential homes are located about 1500 feet to the west of the facility.

Facility Background

The facility was last inspected on March 2, 2022 and found to be in compliance.

On April 19, 2024 the facility was issued a Violation Notice (VN) for emission limit exceedances for the daily VOC limit on EUAUTOPLASCOAT. In response to this VN, the facility reviewed their calculations and determined that the water-based coating line was not averaged into the calculations due to a recordkeeping error. Once this data was included, the facility reported only 2 days of exceeding the daily VOC limit. Facility has since determined ways to make sure that calculations and recordkeeping are compliant moving forward. After discussions with the Jackson District Supervisor, Scott Miller, a VN was not sent for this issue.

Faurecia operates equipment identified in Section 1 of the ROP and Ford Motor Company operates under Section 2. Faurecia's section includes conditions for the main plant production of interior car parts, which include the technologies for creating those parts such as injection molding and surface coating. Ford's section is still active but only has general conditions as the several soil vapor recovery (SVE)

units that are still actively remediating historically identified contamination at the site are now considered exempt from permitting. Since there are no specific requirements for Ford, the inspection focused on Faurecia's section of the ROP.

Regulatory Applicability

The entire facility currently operates under ROP No. MI-ROP-B2063-2018, issued on August 20, 2018, and PTI 35-13A, issued June 3, 2020.

The facility is considered a Major source of VOC and a Major source of HAPs.

The facility is subject 40 CFR Part 63, Subpart PPPP (NESHAP for Surface Coating of Plastic Parts and Products)

The facility is subject to 40 CFR Part 63, Subpart ZZZZ (NESHAP for Stationary Reciprocating Internal Combustion Engines)

The facility is subject to 40 CFR Part 63, Subpart DDDDD (NESHAP for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters-aka BOILER MACT.)

There are several PTI exempt processes at the facility that were listed in the most recent ROP renewal application. These include the following:

EUSMALLHEATERS-Natural gas heaters operated under Rule 282(2)(b)(i).

EUWASTEOILSTORAGE-Waste oil storage operated under Rule 284(2)(e).

EURECLAIMOILSTORAGE-Reclaim oil storage operated under Rule 284(2)(e).

EUGASOLINETANK-500-gallon gasoline storage tank operated under Rule 284(2)(g)(i).

Shogo Ovens 1-4 – natural gas ovens operated under Rule 282(2)(b)(i).

Arrival & Facility Contact

I arrived at Faurecia around 9:30AM. No odors or visible emissions were observed during my approach and drive around the facility. I proceeded to enter through the office, sign in, and watch the safety video playing in the lobby. From there, I met with Debora Romero, EHS Manager, and Randy Sierak, Facilities Manager.

I informed them of my intent to conduct a facility inspection. The Faurecia staff extended their full cooperation during my visit and fully addressed my questions.

Pre-Inspection Meeting

The pre-inspection meeting focused on gaining some basic information about the facility.

The facility currently employs approximately 850-900 people. They operate 24 hours a day, Monday through Friday. Additionally, they may operate on the weekends if product demands require it.

I asked if there had been any changes at the facility since the last inspection. Debora and Randy explained that some equipment has been removed, but other than that, no changes.

As noted in previous inspection reports, EU-AUTOPLASCOATLN is now the only source of significant emissions remaining at the facility.

Onsite Inspection

FG-BOILERS/FG-BOILERMACT

This is the flexible group (FG) for two natural gas-fired steam boilers with fuel oil burning capabilities. We began the inspection by observing the small boiler. This is used for heating the administration building. Later, we observed the larger boiler that heats the water for the emergency fire pump, and the boilers located in the powerhouse. The smaller boiler in the powerhouse has been disconnected, with the lines cut and capped. Randy explained that the firing tubes had leaks and it cost too much to repair.

FG-MACTPPPP

This is the FG for sources that are subject to the NESHAP in 40 CFR Part 63, Subpart PPPP for surface coating of plastic parts. The facility uses primarily water-based coatings that do not exceed the emission limit of 0.16 pounds organic HAP per pound of coating solids. This regulation also includes material limits on thinners, additives, and cleaning materials as having no organic HAP. The facility chooses to comply with Subpart PPPP using the compliant materials option as written in the regulation and the FG. A check of required reporting by the facility for this NESHAP shows compliance.

FG-COLDCLEANERS

This is the FG for any cold cleaner that is grandfathered or exempt from Rule 201 pursuant to Rule 278, 278a, and Rule 281(2)(h) or Rule 285(2)(r)(iv). No cold cleaners were observed during this inspection.

FG-RULE290

This FG covers any emission unit that emits air contaminants and is exempt from the requirements of Rule 201 pursuant to Rules 278, 278a, and 290. The facility operates two emission units under this FG (EU-GlueRobot and EU-CastSkins). We observed both of these units. Randy explained that they no longer run EU-CastSkins, though it is still installed. When observing EU-GlueRobot I was able to see that the filters were installed.

FG-MACT-ZZZZ-EMERGENCY RICE

This is the FG includes existing “certified” emergency stationary reciprocating internal combustion engines (RICE) that have a maximum site rating of 500 brake horsepower (HP) and less than 20 liters per cylinder.

Four of the units (Pump611, Pump612, Pump613, and the Generac) are located on one side of the plant and the fifth unit (Pump614) is located on the opposite side. We

observed all of these units during the inspection. I was able to see the hour meter installed.

EU-AUTOPLASCOATLN

This is the emission unit (EU) described in PTI 35-13A for an automotive interior 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 used in this unit are water-based and solvent-based paints, and water or solvent is used for purge and cleanup.

Randy explained how the parts are cleaned and painted in this line. We observed the area where CO2 is used to blow off the parts before they enter the paint booth. I was able to observe that the paint booth is installed with filters and HVLP robotic paint arms. During previous inspections it was stated that the box filters are replaced once a week and the large bag filters are replaced every two weeks. I observed replacement filters stocked near the unit for future replacements.

We then observed the oven associated with the line. The oven was operating at 181 degrees F. This meets the permit requirement of operating below 194 degrees F.

Recordkeeping/Permit Requirements Review

During the inspection the following record request document was provided to Debora and Randy.

EU-AUTOPLASCOATLN

- 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.
- The following daily records for EUAutoPlasCoatLn for the **month of January 2024**:
 - 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 calculations determining the daily average emission rate in lb/8-hr.
- The following calendar monthly records 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 following records for EUAutoPlasCoatLn kept on a calendar month basis:
 - Gallons of each VOC, acetone (CAS 67-64-1), and tert-butyl acetate (CAS 540-88-5) containing material used and reclaimed.
 - VOC, acetone (CAS 67-64-1), and tert-butyl acetate (CAS 540-88-5) content of each material as applied.

- VOC, acetone (CAS 67-64-1), and tert-butyl acetate (CAS 540-88-5) mass emission calculations determining the monthly emission rate in tons per calendar month.
 - VOC, acetone (CAS 67-64-1), and tert-butyl acetate (CAS 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.
- Records of the cure temperature for EUAutoPlasCoatLn **for the months of October 2023 and February 2024.**

FG-MACT-ZZZZ-EMERGENCY RICE

- For each CI engine, records of the occurrence and duration of each malfunction of operation (i.e. process equipment) or the air pollution control and monitoring equipment.
- Records of all required maintenance performed on the air pollution control and monitoring equipment.
- Records of actions taken during periods of malfunction to minimize emissions in accordance with 40 CFR 63.6605(b), including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation.
- Records to show continuous compliance with each emission or operating limit that applies.
- Records of the maintenance conducted on the stationary RICE in order to demonstrate that the permittee operated and maintained the stationary RICE and after-treatment control device (if any) according to the permittee's maintenance plan.
- Records of the hours of operation of the engine that is recorded through the non-resettable hour meter. Records must document how many hours are spent for emergency operation, including what classified the operation as emergency and how many hours are spent for non-emergency operation.

FG-BOILERMACT

- A copy of each notification and report that the permittee submitted to comply with 40 CFR Part 63, Subpart DDDDD, including all documentation supporting any Initial Notification of Compliance Status or semiannual compliance report that the permittee submitted.
- Records of performance tests, fuel analyses, or other compliance demonstrations and performance evaluations as required in 40 CFR 63.10(b)(2)(viii).

FG-RULE290

- The following records for each emission unit in FG-RULE290 for each calendar month:
 - Records identifying each air contaminant that is emitted.
 - Records identifying if each air contaminant is controlled or uncontrolled.
 - Records identifying if each air contaminant is either carcinogenic or non-carcinogenic.
 - Records identifying the ITSL and IRSL, if established, of each air contaminant that is being emitted under the provisions of Rules 290(2)(a)(ii) and (iii).
 - Records of material use and calculations identifying the quality, nature, and quantity of the air contaminant emissions in sufficient detail to demonstrate that the actual emissions of the emission unit meet the emission limits outlined in the permit and in Rule 290.
- The facility inventory of each emission unit that is exempt pursuant to Rule 290. This inventory shall include:
 - A written description of each emission unit as it is maintained and operated throughout the life of the emission unit.
 - For each emission unit that emits noncarcinogenic particulate air contaminants pursuant to Rule 290(2)(a)(iii), the permittee shall maintain a written description of the control device, including the designed control efficiency and the designed exhaust gas flow rate.
- Records of the monthly visible emission observations conducted for each emission unit that emits noncarcinogenic particulate air contaminants pursuant to Rule 290(2)(a)(iii).

FG-COLDCLEANERS

- The following information for each cold cleaner:
 - A serial number, model number, or other unique identifier for each cold cleaner
 - The date the unit was installed, manufactured, or that it commenced operation
 - The air/vapor interface area for any unit claimed to be exempt under Rule 281(2)(h)
 - The applicable Rule 201 exemption
 - The Reid vapor pressure of each solvent used
If applicable, the option chosen to comply with Rule 707(2).
- EU-RULE287(2)(C)**

- **The following records for each emission unit for each calendar month:**
 - **Volume of coating used, as applied, minus water, in gallons.**
 - **For emission units installed on or after December 20, 2016, documentation of any filter replacements or maintenance of water wash control for exhaust systems serving coating spray equipment of other documentation included in a plan developed by the owner or operator of the equipment. For emission units installed before December 20, 2016, documentation that the exhaust system that serves only coating spray equipment is supplied with a properly installed and operating particulate control system.**

These records were received from Faurecia on August 28, 2024. After receiving this data, I then asked for the daily records for EUAUTOPLASCOATLN for February, April, May, June, and July of 2024. Debora provided these on September 6th.

Attachment 1 is the coating composition and emission records for EUAUTOPLASCOATLN. These records appear to show that the facility is meeting the 12-month rolling VOC emission limit, the 12-month rolling VOC, Acetone, and Tert-butyl acetate combined emission limit, and the 12-month rolling Dibasic Esters emission limit. Additionally, these records appear to show compliance with the daily emission limits for Tert-butyl acetate. In regards to the daily VOC limit, the facility had two days (one in January and one in February) where they slightly exceeded the limit of 5.0 lb/gal. In January they had one day of 5.2 lb/gal, and in February they had one day of 5.1 lb/gal. These exceedances were reported during the facility's semi-annual certification, as mentioned above. Since February, it does not appear that the facility has had any exceedances of the daily VOC limit.

Attachment 2 is the cure oven temperature records for October 2023 and February 2024. These records appear to show compliance with the recordkeeping requirement as well as showing that the facility is keeping the temperature of the ovens within the range limit needed for the coatings to be considered air-dried.

Attachment 3 is the run time and maintenance records for the emergency generators at the facility. These records appear to show compliance with the run time limits set under the federal standard. The facility reports no malfunctions with these units. Additionally, the facility reports that oil changes on the fire pumps occurred in April 2024.

Attachment 4 is the most recent tune-up and certification records for the facility's boilers as required by 40 CFR Part 63, Subpart DDDDD. These records appear to show compliance.

In regards to the cold cleaners, the facility indicates that they have two onsite, one in the tool room and one in E11 Maintenance. They indicate that Heritage-Crystal Clean owns and services the cold cleaners, and that they are operating under a Rule (2)(r) (iv) exemption. Additionally, they state that the solvent is not heated and that the Reid Vapor pressure is less than 0.1 mmHg at approximately 100 degrees F. This was confirmed with the SDS during the last inspection. This SDS is located in the facility file.

Attachment 6 is the Rule 290 records as required by their ROP for FG-RULE290. These records appear to show compliance.

Overall, the records appear to show compliance with the required monitoring and recordkeeping requirements. Additionally, the records appear to show compliance with the permitted emission limits.

Post-Inspection Meeting

After the facility observation I met with Debora and Randy for a brief post-inspection meeting. I provided them with the list of records that I would be expecting to review.

I informed them of the report that will be generated once the record review has been completed. I explained that, once my supervisor approves it, they will be sent a copy of the report from our secretary.

I thanked the Faurecia staff for their time and corporation and departed the facility around 11:30 AM.

Compliance Summary

Based upon the inspection and review of the records, Faurecia Saline appears to be in compliance at the time of this inspection.

The company should continue to monitor their daily VOC emissions for EUAUTOPLASCOATLN closely to ensure that there are no future exceedances.

NAME Stephen Weems

DATE 9/11/2024

SUPERVISOR [Signature]