

DEPARTMENT OF ENVIRONMENTAL QUALITY  
AIR QUALITY DIVISION  
ACTIVITY REPORT: Scheduled Inspection

B242929652

FACILITY: FAURECIA INTERIOR SYSTEMS		SRN / ID: B2429
LOCATION: 17801 EAST FOURTEEN MILE RD, FRASER		DISTRICT: Southeast Michigan
CITY: FRASER		COUNTY: MACOMB
CONTACT: Nick Solomon , HSE Specialist		ACTIVITY DATE: 05/22/2015
STAFF: Samuel Liveson	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: Scheduled inspection of an Opt-Out source.		
RESOLVED COMPLAINTS:		

On May 22, 2015 I conducted an unannounced, scheduled, level 2 inspection of Faurecia Interior Systems (Faurecia), located at 17801 East 14 Mile Road in Fraser, Michigan. Air Quality (AQD) staff Kerry Kelly, Environmental Quality Analyst, accompanied me on the inspection. The purpose of this inspection was to determine the facility's compliance with the federal Clean Air Act, Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended, the conditions of Permit to Install (PTI) No. 15-12, and New Source Performance Standard Part 60 Subpart Dc: Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units (40 CFR Part 60 Subpart Dc).

I attempted to conduct an inspection May 21 around 1:30 PM, but agreed to revisit the following morning because facility contacts were unavailable.

We arrived on site May 22 around 9:50 am. We met with Mr. Nick Solomon, HSE Specialist, and with Ms. Melissa Hall, in Environmental, Health & Safety. Ms. Hall provided records and a site walkthrough and Mr. Solomon explained equipment and operations. I provided Ms. Hall and Mr. Solomon with my contact information and a copy of the pamphlet "DEQ Environmental Inspections: Rights and Responsibilities."

#### Opening Meeting

Faurecia manufactures vehicle interiors. Door panels and center consoles are created through reaction injection molding. These parts can be colored during reaction molding, coated in a coating booth, or sprayed with an adhesive so a thin vinyl sheet can be applied to the part. Seats are not manufactured at this facility. The company typically operates 3 shifts 24 hours for 7 days a week. Clients include Ford, GM, and FCA.

#### Facility Walk-Through

##### **PTI No. 15-12**

EUGLUELINE1 is known as the south adhesive line. The adhesive line was operating during the inspection. Parts are taken off a metal rack and sprayed with adhesive by hand. They are then placed back on a line to enter a natural gas-fired oven. The adhesive line appears to use a high volume, low pressure (HVLP) applicator per PTI No. 15-12 FGCOATLINES Special Condition (S.C.) IV.2. According to Ms. Hall, all glue and coating lines are cleaned with water. This water is collected and disposed of by US Industrial Technologies (USIT) in Livonia as non-hazardous waste per S.C. III.2. Ms. Hall provided Manifests of Disposal from April and February of 2015.

Filters were in place and appeared to be operating properly per S.C. IV.1. There were no gaps in the exhaust filters, and no fallout or opacity was observed. Grid filters manufactured by Paint Pockets are placed behind a blanket mesh filter. According to Mr. Solomon, rather than use manometers to measure pressure differential and determine when to replace filters, instead mesh blanket filters are changed on a conservative basis approximately once per shift. Grid filters are replaced less frequently as needed.

EUGLUELINE2 is known as the north adhesive line. It was not operating during the inspection. However, grid filters manufactured by Paint Pockets and a new blanket mesh filter were in place along the exhaust wall. Excess grid and mesh filters were available next to the adhesive line. Mesh blanket filters are changed on a conservative basis approximately once per shift. Grid filters are replaced less frequently as needed. Filters are disposed with other solid waste per S.C. III.3. This adhesive line includes a natural gas fired oven.

We visited the paint kitchen for EUGLUELINE2 where the adhesive is hooked up to the HVLP applicator per S.C. IV.2. The paint kitchen is immediately behind the adhesive line. Two 5-gallon containers of adhesive were closed per S.C. III.4 and connected to the HVLP applicator. The kitchen was clean and no odors were detected. According to Ms. Hall, about 10 different coatings are used at the facility. Coatings are agitated on site but not

adjusted for viscosity.

EUCOATLINE1 was not operating during our inspection. Filters appear to be in place and coatings appear to be applied manually via an HVLP applicator. Mesh blanket filters are changed on a conservative basis approximately once per shift. Grid filters are replaced less frequently as needed. The line includes an associated natural gas fired oven.

EUCOATLINE2 was operating during the inspection. The line was difficult to view except through windows in the door to the booth because the booth is completely enclosed and has a robotic applicator. According to Ms. Hall, the line has an HVLP applicator and grid and mesh blanket filters similar to the other adhesive and coating lines. A touch-up area associated with EUCOATLINE2 appears to have an HVLP applicator and particulate control filters. A waste compactor to collect rags for disposal with USIT in Livonia was located at this paint booth per S.C. III.2.

For recordkeeping, all other adhesive and coating lines have moved to a consumption-based recordkeeping system that doesn't require handwritten records; however, EUCOATLINE2 still has paper records that are manually transmitted to database since in PTI No. 15-12, EUCOATLINE2 has a separate VOC limit of 30 tons per year (tpy). Ms. Hall provided sample recordkeeping sheets for March of 2015. These logs also document when particulate filters are changed, which occurs approximately daily.

EUCOATLINE3 was operating during the inspection. A robotic arm appears to apply coating with an HVLP applicator. The coating line is enclosed but visible through windows. Two layers of filters appear to be in place; grid filters behind a blanket mesh filter. Mesh blanket filters are changed on a conservative basis approximately once per shift. Grid filters are replaced less frequently as needed. Two natural gas fired ovens are associated with this booth.

We visited the paint kitchen behind the EUCOATLINE3. Two 5-gallon coating containers were closed per S.C. III.4 and connected to the coating line. The kitchen was clean and no odors were detected. According to Ms. Hall, coatings are agitated on site but not adjusted for viscosity.

We visited the container storage area where all coatings are stored before being brought out to their respective coating line for use. No odors were observed in the container storage area. All coatings are received in 5-gallon containers. Lids were on all containers per S.C. III.4.

### **Injection Molding Machines**

According to Mr. Solomon, there are approximately 23 plastic injection machines at the facility. Plastic pellets of many types are heated and pushed into the machines. Often, a small amount of a colorant is added to color the part. A colorant is a colored plastic pellet. The machines are enclosed and appear to emit to the general in-plant environment. The plastic injection machines appear to be exempt from permitting requirements per R 286(b). Stoner Rocket Release (Rocket Release) is the mold release agent. It is applied via aerosol cans. The MSDS is available in the manila file folder. According to the MSDS, there are no hazardous air pollutants (HAPs) in Rocket Release. This mold release application appears to be exempt from permitting requirements via R 287(b).

There are six foam reaction injection molding machines at the facility. These insert foam between plastic products for aesthetics and sound deadening. This process appears to be exempt from permitting requirements per R 286(d). According to Mr. Solomon, no mold release agent is used with these foam injection molding machines.

### **NSPS Dc Boiler**

Faurecia has a natural-gas fired boiler on site for space heating. The unit is located outside the main building. Mr. Solomon provided a picture of the nameplate because we were unable to view the boiler during the inspection because maintenance staff were unavailable to unlock the boiler room. The boiler did not appear to be in operation; an exposed part of the boiler was ambient temperature during our inspection. According to Mr. Solomon, the boiler is not used during summer months.

The boiler appears to be subject to 40 CFR Part 60 Subpart Dc. The boiler heat input capacity is 20.9 MMBtu and its date of start-up is July of 2006 according to the Initial Notification and Information form received from Faurecia on February 9, 2009, located in the AQD manila file folder. Because the boiler does not burn coal or oil, the main requirement is "to record and maintain records of the total amount of each steam generating unit fuel delivered to that property during each calendar month" per §60.48c(g)(3). Mr. Solomon provided monthly natural gas use records for January through March of 2015.

### Miscellaneous Equipment

A milling machine mills the plastic parts that have been molded via the injection molding process. This machine appears to emit to the general in-plant environment after passing through a dust collector. This milling machine appears to be exempt from permitting requirements per R 285(vi)(B).

According to Mr. Solomon and Ms. Hall there are no cold cleaners or emergency generators on site.

### Recordkeeping

#### FGCOATLINES

Ms. Hall provided printouts of gallons of each VOC- and HAP-containing material used per S.C. VI.3(a) for January of 2014 through April of 2015. Gallons of coatings used are based upon purchase records. The coating usage numbers are spot-checked against consumption records based on bills of process – for example, knowledge that for each Part A produced, it takes 10 grams of Coating A, so if 10 Part A's are produced in April, 100 grams of Coating A will be used. It is assumed that all purchased coatings are used and none are reclaimed per S.C. VI.3(a).

Included in the monthly gallons of coatings used is a record of the VOC emissions in tons per calendar month per S.C. VI.4(a). Additionally Ms. Hall provided VOC monthly 12-month rolling annual emission calculations for FGCOATLINES and EUCOATLINE2 from June of 2012 through April of 2015 per S.C. VI.1. The highest 12-month rolling total for FGCOATLINES is 20.7 tons per 12-month rolling time period in April of 2015, below the permit limit of 45 tons per year per S.C. I.1. Similarly, the highest 12-month rolling total for EUCOATLINE2 is 3.5 tons per 12-month rolling time period in July and August of 2013, below the permit limit of 30 tons per year per S.C. I.2. To calculate VOC emissions of EUCOATLINE2, paper logs of coating usage are kept only on EUCOATLINE2. These logs are manually input into the recordkeeping database. Ms. Hall provided example paper logs of coating usage for March of 2015.

According to records, nine different coatings and adhesives have been used at the facility since January of 2014. Environmental Data Sheets for coatings are provided in the facility manila folder per S.C. VI.2. Method 24 VOC contents for six of those coatings are located in the manila folder from August of 2012. Mr. Solomon provided the additional Method 24 results in an email on June 5, 2015 per S.C. V.1. The VOC content of these coatings in pounds (lbs) VOC per gallon minus water are 3.77 (Dhake Satin Black), 2.96 (Medium Titanium), and 2.92 (Medium Cashmere). The VOC contents of all coatings minus water, as provided per S.C. VI.3(b), appear to be less than 4.2 lb/gal minus water per S.C. II.1.

#### FG-FACILITY

Ms. Hall provided printouts of gallons of each VOC- and HAP-containing material used per S.C. VI.2(a) for January of 2014 through April of 2015. According to Ms. Hall, no materials are reclaimed per S.C. VI.2(b).

Monthly records of HAP emissions in tons per 12-month rolling time period at the facility were provided for January of 2011 through April of 2015 per S.C. VI.2(d)&(e). According to records, the highest single HAP 12-month rolling total is 0.024 tons of chloroform per 12-month rolling time period in April of 2015, and the highest aggregate HAP 12-month rolling total is 0.147 tons per 12-month rolling time period in April of 2015.

For HAP content of materials, the formulation data and material safety datasheets (MSDSs) for many coatings are provided in the manila folder and Mr. Solomon provided the environmental data sheets for Medium Cashmere and Medium Titanium per S.C. V.1 and VI.2(c). According to records, some HAP content appears to be determined via MSDS's rather than formulation data. However, S.C. V.1 states that HAP content be determined by formulation data only. Because S.C. VI.2 of FGCOATLINES states that chemical composition data may consist of MSDSs, and because the HAP rolling totals are well below permit limits, I used discretion to avoid issuing a violation notice for HAP contents determined from MSDS's. I spoke with Ms. Hall and Mr. Solomon about using formulation data to determine HAP contents per S.C. V.1.

### Compliance

Based on the AQD inspection and records review, it appears that Faurecia is in compliance with the federal Clean Air Act, Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended, the conditions of PTI No. 15-12, and 40 CFR Part 60 Subpart Dc.

NAME *Amanda* DATE 6/5/2015 SUPERVISOR *CJE*