



STATE OF MICHIGAN  
 DEPARTMENT OF ENVIRONMENTAL QUALITY  
 SOUTHEAST MICHIGAN DISTRICT OFFICE



RICK SNYDER  
 GOVERNOR

DAN WYANT  
 DIRECTOR

July 1, 2015

Mr. Dan Barr, Plant Manager  
 International Automotive Components  
 1905 Beard Street  
 Port Huron, Michigan 48060

SRN: B6625, St. Clair County

Dear Mr. Barr:

**VIOLATION NOTICE**

On May 8, 2015, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of International Automotive Components (IAC) located at 1905 Beard Street, Port Huron, Michigan. The purpose of this inspection was to determine IAC's 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 administrative rules and the conditions of Permit to Install (PTI) number 183-10.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
FG-HEADLINER	PTI No.183-10, FG-HEADLINER Special Conditions VI.1 and VI.3.	The data originally provided for the 2014 MAERS was a copy of the 2013 data. During the inspection, it was noted that IAC did not have appropriate production nor emission calculation records for 2014.
FG-HEADLINER	PTI No.183-10, FG-HEADLINER Special Condition VI.2	The Safety Data Sheets (SDS) provided during the inspection, indicated significant changes in material formulations; the records provided during the inspection and subsequent emails do not reflect the change in material formulation.
FG-FACILITY	PTI No.183-10, FG-FACILITY Special Conditions V.1, VI.2, VI.3 and VI.4	The Safety Data Sheets (SDS) provided during the inspection, indicated significant changes in material formulations; the records provided during the inspection and subsequent emails do not reflect the change in material formulations.
FG-FACILITY	PTI No.183-10, FG-FACILITY Special Condition VI.1	IAC could not provide 12-month rolling emissions for facility-wide HAPs and VOC.

During this inspection, the AQD requested record keeping for 2013 through 2015 and copies of the Safety Data Sheets (SDS) for all adhesives, catalyst, and mold release products. IAC was unable to produce 12-month rolling records for VOCs, 12-month rolling records for HAPs, and monthly/yearly emission records for 2014. It was also noted that the data reported for 2014 to Michigan Air Emissions Reporting System (MAERS) was a copy of the 2013 MAERS data. The AQD acknowledges meeting with Ms. Gail Eschenberg on May 29, 2015, in which she stated the data was mistakenly deleted. Subsequently, Ms. Eschenberg submitted an updated 2014 MAERS database; however the database did not reflect changes in the formulation of the materials used at the facility.

Upon review of the SDSs, it was noted that the formulations for the adhesives used in the UROCORE process have changed; specifically the methylene diphenyl diisocyanate (MDI) content of adhesive 2U010 has increase from 14% to 50-70% (see SDS for details). The SDS provided by IAC indicates the formulation change at some point in 2012 (the SDS is dated 8-6-2012). The formulation of adhesive 2U010 was also confirmed via email by H.B. Fuller on June 8, 2015. IAC has not updated the facilities record keeping to reflect the changes in material formulations.

The above mentioned observations are violations of the following permit conditions found in Permit to Install (PTI) number 183-10: FG-HEADLINER Special Condition numbers VI.1, VI.2, and VI.3. and FG-FACILITY Special Condition numbers, V.1, VI.1, VI.2, VI.3, and VI.4. Enclosed is a copy of the PTI.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by July 22, 2015 (which coincides with 21 calendar days from the date of this letter). 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.

In addition, please update and include the following information with your response:

- Facility-wide Potential to Emit (PTE) demonstration for all pollutants at the facility.
- List of each raw material used and the manufacturer's formulation data for each.
- Process List (See enclosed example from 2010).
- Process parameters (See enclosed example from 2010).
- MDI calculations for all UROCORE Lines.
- For 2012-2015, monthly record keeping for each process line.
- For 2012-2015, 12 month rolling records for VOC and HAP emissions.

Also, based on the significant changes in material formulations, the AQD is requesting that IAC re-evaluate and verify the methylene diphenyl diisocyanate, toluene, and 1,2-dichloroethane emission rates for the UROCORE heated press operations by testing at owner's expense, in accordance with Department requirements. No less than 60 days prior to testing, the permittee shall submit a complete test plan to the AQD. The AQD must approve the final plan prior to testing. Verification of emission rates includes the submittal of a complete report of the test results to the AQD within 60 days following the last date of the test.

If IAC 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 and for the cooperation that was extended to me during my inspection of IAC. 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,



Rebecca Loftus  
Senior Environmental Quality Analyst  
Air Quality Division  
586-753-3735

RL/DC

Attachments

cc/via e-mail: Ms. Gail Eschenberg, IAC  
Ms. Molly Smith, EPA  
Ms. Lynn Fiedler, DEQ  
Ms. Teresa Seidel, DEQ  
Mr. Thomas Hess, DEQ  
Mr. Chris Ethridge, DEQ