

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: Self Initiated Inspection

U23161168837235

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|-------------------------------------------------------------------------------------------------|-------------------------------|---------------------------|
| FACILITY: Faurecia | | SRN / ID: U231611688 |
| LOCATION: 2510 Snow Rd, Lansing | | DISTRICT: Lansing |
| CITY: Lansing | | COUNTY: EATON |
| CONTACT: Mike Armstrong , JIT Plant Manager | | ACTIVITY DATE: 10/20/2016 |
| STAFF: Michelle Luplow | COMPLIANCE STATUS: Compliance | SOURCE CLASS: |
| SUBJECT: Self-initiated inspection as part of the Canal/Creyts Rd/Lansing Rd facilities survey. | | |
| RESOLVED COMPLAINTS: | | |

Inspected by: Michelle Luplow

Personnel Present: Mike Armstrong, JIT Plant Manager (mike.armstrong@faurecia.com)
Stephen Laski, Engineering Manager (Stephen.laski@faurecia.com)

Purpose: Conduct an unannounced, self-initiated compliance inspection. This activity was conducted as part of a Canal Rd, Creyts Rd, Lansing Rd facilities survey to address a letter received May 11, 2016 from the residents of Old Lansing Road concerning air quality in the area. This inspection allowed AQD to get a better picture of what is in the area in order to address their concerns.

Facility Background/Regulatory Overview: Faurecia is a minor source of HAPs and criteria air pollutants. They assemble door pads for General Motors' Cadillac and Camaro, which involves a small amount of ultrasonic welding and occasional use of aerosol spray cans for touch-up purposes on the undersides of the door panels. They also have a natural gas-fired Cummins generator which is used when they've lost power. Plant Manager, Mike Armstrong, said that Faurecia operates 24 hours per day, 5 days per week, with the occasional shift on Saturdays.

There are two other companies that share the large building which Faurecia is part of. ANM, a company contracted out by Bridgewater (who is renting a portion of the building behind Faurecia) and Comprehensive Logistics rents the back third of the building (a trucking company).

Faurecia has been at this location since 2011; pre-2011 they were located at 16020 S. Lowell Rd (off of Grand River Avenue) in Clinton County.

Table 1 contains a list of PTI-exempt equipment located onsite.

Table 1. Exempt equipment

| Emission Unit | PTI Exemption | Compliance Notes |
|------------------------------------------------------------------------------------------------------------------------------|----------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Drill presses Saws | Rule 336.1285(l)(vi) | Compliance |
| Aerosol can spray painting | Rule 336.1287(b) | Compliance |
| Ultra-sonic welding | Rule 336.1285(i) | Compliance |
| Three (3) Natural gas-fired Furnaces to heat the building, each rated at 487,104 Btu/hr | Rule 336.1282(b)(i) | Compliance |
| Cummins 150GGLB Spark-Ignition Natural gas-fired, 220 hp engine; 511,000 Btu/hr; Installed Nov 2014, manufactured June 2006. | Rule 336.1285(g) | The engine is subject to New Source Performance Standard (NSPS) JJJJ, but there are no regulatory requirements at this time under this regulation. It was operated 12 hours in 2015. |

Inspection: This was an unannounced, self-initiated compliance inspection. At approximately 8:30 a.m. on October 20, 2016, I met with Mike Armstrong and provided him with a July 2014 PTI exemptions handbook, which he passed along to Engineering Manager, Steve Laski.

M. Armstrong provided me a tour of the facility. Faurecia has 3 air handling units/heaters that are used to heat the building. S. Laski said that they are each 487,104Btu/hr heat input, which makes them exempt from a permit to install (PTI) via Rule 282(b)(i).

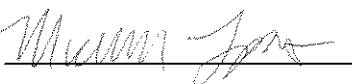
Various work stations are set up throughout the plant to assemble the car door pads (all plastic parts) for the Camaro and Cadillac. The majority of the work involves manual installation of the electrical wiring, push-buttons, etc into the car panels, and assembling various parts into the panel via ultra-sonic welding. The welding is exempt under Rule 285(i).

M. Armstrong said aerosol spray paint cans are used for touch-up jobs on the undersides of the door pads. He showed me that the waste aerosol cans are punctured and placed into a waste receptacle, or, if the cans can't be punctured, they are placed into a separate waste stream. Use of aerosol spray cans is exempt under Rule 287(b).

There is a 220 hp natural gas-fired Cummins engine that Faurecia installed in November 2014 to provide back-up power for their production line as well as for their wireless communication lines between Faurecia and GM. S. Laski said that GM requires per their contract that Faurecia test the engine twice per year: The first test requires that Faurecia run all production/processes for 4 hours on the engine alone to demonstrate that the engine is sufficient for this purpose. The other test GM requires is to demonstrate that running the generator will be enough to keep their wireless communications operating in the event of a power outage. Other than the 2 required GM tests, Faurecia will run their engine one hour each quarter for maintenance. Because there is operation outside of what the manufacturer recommends, this engine is not to be considered an emergency engine by the RICE MACT Subpart ZZZZ or the NSPS Subpart JJJJ. That said, the engine's installation date makes it subject to the NSPS, however the NSPS does not have requirements for engines that were manufactured in 2006 (NSPS requirements are for engines manufactured on or after July 1, 2008). Therefore, the engine is subject to NSPS JJJJ but at this time there are no regulatory requirements that Faurecia must comply with.

S. Laski had concerns with proper disposal of an oil/water mixture from their air compressor and dumping the mixture down their sanitary sewer drain. I referred him to Laura Mathews of the Water Resources Division to address his concern.

Compliance Statement: Faurecia appears to be in compliance with Michigan Air Pollution Control Rules at this time.

NAME 

DATE 10/27/16

SUPERVISOR 