



GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF
ENVIRONMENT, GREAT LAKES, AND ENERGY
JACKSON DISTRICT OFFICE



PHILLIP D. ROOS
DIRECTOR

April 19, 2024

VIA EMAIL ONLY

John Williamson, Plant Manager
Faurecia Interior Systems Saline, LLC
7700 Michigan Avenue
Saline, MI 48176

SRN: B2063, Washtenaw County

Dear John Williamson:

VIOLATION NOTICE

On March 20, 2024, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), received the semi-annual and annual report certifications from Faurecia Interior Systems Saline, LLC located at 7700 Michigan Avenue, Saline, Michigan. The AQD's review of these certifications has identified non-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 Air Pollution Control Rules; and the conditions of Renewable Operating Permit (ROP) number MI-ROP-B2063-2018a;

During the AQD's review of the reports, staff observed the following:

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

The conditions of ROP number MI-ROP-B2063-2018a limit the emissions of VOC to 5 lb/gal (less water) daily. The records provided demonstrate that actual emissions of VOC from the EU-AutoPlasCoat Ln process equipment exceeded the daily limit.

This process is also subject to the federal National Emission Standards for Hazardous Air Pollutants (NESHAP) for Surface Coating of Plastic Parts and Products. These standards are found in 40 CFR Part 63, Subpart PPPP. The conditions of MI-ROP-

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B2063-2018a limit organic HAP emissions to 0.16 lb per lb of coating solids. The records provided demonstrate that actual emissions of organic HAPs exceeded this limit.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by April 10, 2024 (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.

Please submit the written response to Stephanie Weems at EGLE, AQD, Jackson District, at 301 East Louis Glick Highway, Jackson, Michigan 49201 or Weemss@michigan.gov and submit a copy to Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Faurecia Interior Services Saline, LLC 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. 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,



Stephanie Weems
Senior Environmental Quality Analyst
Air Quality Division
517-416-3351

cc: James Hankins, Faurecia
Annette Switzer, EGLE
Christopher Ethridge, EGLE
Brad Myott, EGLE
Jenine Camilleri, EGLE
Scott Miller, EGLE
Kelly Orent, EGLE
Sam Liveson, EGLE