

STATE OF MICHIGAN  
DEPARTMENT OF NATURAL RESOURCES  
OFFICE OF DIRECTOR

\_\_\_\_\_  
In the matter of administrative )  
proceedings involving **WOODBIDGE** )  
**CORPORATION**, a corporation organized )  
under the laws of the State )  
of Wisconsin and doing business at )  
435 Eight Mile Road, Village of )  
Whitmore Lake, County of Washtenaw, )  
State of Michigan. )  
\_\_\_\_\_

SIP No. 40-1993

STIPULATION FOR ENTRY OF  
FINAL ORDER BY CONSENT

This proceeding results from provisions of the Federal Clean Air Act ("CAA"), 42 U.S.C. Section 7401 et seq., as amended by the Clean Air Act Amendments of 1990, P.L. No. 101-549, 104 Stat. 2399 (Nov. 15, 1990), that designate Washtenaw County as "moderate" non-attainment for ozone and require a State Implementation Plan ("SIP") that provides for the implementation of Reasonably Available Control Technology ("RACT") with respect to all major sources of volatile organic compounds ("VOCs") that are located in the non-attainment area.

Woodbridge Corporation ("Company") owns and operates a plant ("Plant") that manufactures automotive seats, located at 435 Eight Mile Road, Village of Whitmore Lake, County of Washtenaw, State of Michigan. The Michigan Department of Natural Resources ("MDNR") alleges that the Plant is a major source of VOC emissions which is subject to the RACT requirements of the Federal CAA.

The Company and the MDNR stipulate as follows:

1. The MDNR Director is authorized by Executive Order 1991-31 of the State of Michigan to administer and enforce the Air Pollution Act ("Act 348"), 1965 as amended, MCL 336.11 et seq; MSA 14.58(1) et seq.

2. The MDNR Director is charged with the investigation and enforcement of all orders, regulations, rules, standards, and statutes of the State of Michigan concerning the emission and control of air contaminants.

3. The termination of this matter by a Final Order to be entered by consent pursuant to Section 9 of Act 348, MCL 336.19; MSA 14.58(19), is proper and acceptable.

4. The signing of this stipulation does not constitute an admission by the Company that the law has been violated.

5. This final order by consent does not arise from an enforcement action of the MDNR. The purpose of this final order by consent is to embody the requirements of Section 182(b)(2)(C) of the Federal CAA pertaining to the application of RACT at a major source of VOC in an ozone nonattainment area.

#### COMPLIANCE PROGRAM IMPLEMENTATION SCHEDULE

5. A. Emission Limitations--Mold Line 1

(1) On and after September 21, 1993, the spray mold release agent (MRA) applied to all lid portions of the seat molds on Line 1 shall consist exclusively of a water-borne formulation containing no methylene chloride or other volatile organic compounds (VOC).

(2) On and after September 21, 1993, the VOC content of the spray MRA applied to all bowl portions of the seat molds on Line 1 shall not exceed 6.2 pounds of VOC per gallon of MRA,

minus water, as applied. The spray MRA shall contain no methylene chloride.

- (3) On and after January 1, 1995, the spray MRA applied to all bowl portions of the seat molds on Line 1 shall not be applied with conventional air atomized spray equipment. All spray patterns shall be controlled by programmable, automatic equipment. All spray equipment and all automatic equipment shall be installed, maintained and operated in accordance with the recommendations and design of the equipment manufacturer.
- (4) On and after September 21, 1993, the VOC content of the paste MRA used on Line 1 shall not exceed 4.68 pounds of VOC per gallon of MRA, minus water, as applied. The paste MRA shall contain no methylene chloride.

B. Emission Limitations - Mold Line 3

- (1) On and after September 21, 1993, the spray MRA applied to all lid portions of the seat molds on Line 3 shall consist exclusively of a water-borne formulation containing no methylene chloride or other VOC's.
- (2) On and after September 21, 1993, the VOC content of the spray MRA applied to all bowl portions of the seat molds on Line 3 shall not exceed 6.2 pounds of VOC per gallon of MRA, minus water, as applied. The spray MRA shall contain no methylene chloride.

- (3) On and after January 1, 1995, the spray MRA applied to all bowl portions of the seat molds on Line 3 shall not be applied with conventional air atomized spray equipment. Application spray patterns shall be controlled by programmable, automatic equipment. All spray equipment and all automatic equipment shall be installed, maintained and operated in accordance with the recommendations and design of the equipment manufacturer.
- (4) On and after September 21, 1993, the VOC content of the paste MRA used on Line 3 shall not exceed 4.68 pounds of VOC per gallon of MRA, minus water, as applied. The paste MRA shall contain no methylene chloride.

C. Emission Limitations - Mold Lines 1 and 3 Combined

- (1) From September 21, 1993 until December 31, 1994, the total VOC emitted from the application of spray MRA on Line 1 and Line 3 combined shall not exceed 1700 pounds per day nor 258.3 tons per year.
- (2) On and after January 1, 1995, the total VOC emitted from the application of spray MRA on Line 1 and Line 3 combined shall not exceed 1000 pounds per day nor 152 tons per year.
- (3) On and after January 1, 1995, in the event that either Line 1 or Line 3 ceases to operate the total VOC emitted from the application of spray MRA on the remaining operating Line 1 or Line 3 shall not exceed 750 pounds per day nor 114 tons per year.

- (4) On and after September 21, 1993, the total VOC emitted from the application of paste MRA on Line 1 and Line 3 combined shall not exceed 200 pounds per day nor 15.2 tons per year.
- (5) On and after January 1, 1995, in the event that either Line 1 or Line 3 ceases to operate the total VOC emitted from the application of paste MRA on the remaining operating Line 1 or Line 3 shall not exceed 150 pounds per day nor 11.4 tons per year.

TESTING AND RECORDKEEPING

6. The VOC contents of any MRA used on Line 1 or on Line 3 as applied shall be determined using Federal Reference Test Method 24.

7. The Company shall record the VOC content, the total gallons of MRA applied, and the total daily and yearly VOC emitted from all spray and paste MRA applied on Line 1 and Line 3. Daily VOC emission rates shall be calculated by multiplying the appropriate daily volumetric reservoir change by the corresponding VOC content. Yearly VOC emission rates shall be calculated by summing the appropriate daily VOC emissions calculations. This information shall be kept on file for a period of at least two years and made available to the Air Quality Division upon request.

GENERAL PROVISIONS

8. Upon entry, this final order by consent, along with other supporting documentation required by the U.S. Environmental Protection Agency (EPA), shall be submitted to the USEPA for approval as a revision to the Michigan SIP in accordance with Sections 110 and 182 of the Federal CAA.

9. Pursuant to Section 120 of the Federal CAA, PL 95-95, as amended, the Company may be required to pay a noncompliance penalty for failure to comply with rules which have been promulgated under the Air Pollution Act and which are part of the USEPA approved SIP for the State of Michigan.

10. This abatement program is not a variance subject to the 12-month limitation specified in Section 22 of the Air Pollution Act, being MCLA 336.32.

11. The provisions of this final order by consent shall be binding on the parties to this action, their officers, servants, employees, and attorneys and on those persons in active concert or participation with them who receive actual notice to this order. In the event Woodbridge Corporation sells or transfers the facility located at 435 Eight Mile Road, Whitmore Lake, it shall advise the purchaser or transferee of the existence of this order in connection with such sale or transfer. Within 30 calendar days, Woodbridge Corporation shall also notify the MDNR, in writing of such sale or transfer, the identity and address of any purchaser or transferee, and confirm the fact that notice of this order has been given to the purchaser or transferee.

12. The MDNR and the Company both acknowledge that a public hearing on this abatement program was held on September 21, 1993. Enforcement of this final order by consent in the same manner and by the same procedures for all final orders entered pursuant to Section 16 of 1965 PA 348, as amended, MCLA 336.26; MSA 14.58(16), including enforcement pursuant to the Michigan Environmental Protection Act ("MERA"), 1970 PA 127, MCLA 691.1201 et seq; MSA 14.528(201) et seq.

The undersigned, who is signing this stipulation and final order by consent for the Company, certifies that he/she is fully authorized by the Company to

enter into this stipulation and final order by consent and to execute and legally bind the Company to it.

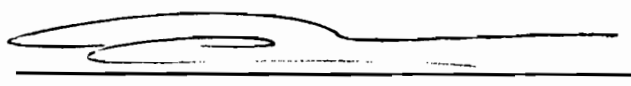
Approved as to Form and Content:



WOODBIDGE CORPORATION

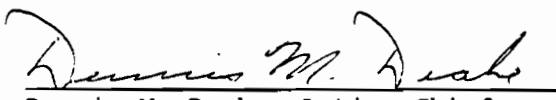
Dated: 10/26/93

The above signatory subscribed and sworn to before me this 26<sup>th</sup> day of October, 1993.



Notary Public

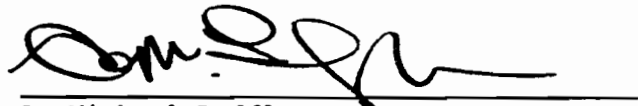
Approved as to Content:



Dennis M. Drake, Acting Chief  
AIR QUALITY DIVISION  
DEPARTMENT OF NATURAL RESOURCES

Dated: 11/12/93

Approved as to Form:



A. Michael Leffler  
Assistant Attorney General  
DEPARTMENT OF ATTORNEY GENERAL

Dated: 11/12/93

FINAL ORDER

The Director of the MDNR having had opportunity to review the above Stipulation for Entry of Final Order by Consent and the MDNR Director having authorized the Chief of the Air Quality Division of the Department of Natural Resources as agent of the Office of the Director to enter into consent orders,

IT IS ORDERED that this stipulation and order be approved and be entered in the record of the MDNR as a Final Order by Consent.

STATE OF MICHIGAN  
DEPARTMENT OF NATURAL RESOURCES  
AIR QUALITY DIVISION

By: Dennis M. Drake  
Dennis M. Drake  
Acting Division Chief

Dated: 11/12/93