



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

100 N. Senate Avenue • Indianapolis, IN 46204
(800) 451-6027 • (317) 232-8603 • www.idem.IN.gov

Eric J. Holcomb
Governor

Brian C. Rockensuess
Commissioner

June 19, 2024

VIA ELECTRONIC MAIL:

Gregory Mourat, Regional Operations
Vice President
Valeo North America, Inc.
150 Stephenson Highway
Troy, MI 48083
gregory.mourat@valeo.com

VIA CERTIFIED MAIL #9589 0710 5270 0682 2480 25

CT Corporation System, Registered Agent
334 North Senate Avenue
Indianapolis, IN 46204

Re: Notice of Violation and Proposed Agreed Order
Valeo North America, Inc.
Plant ID No. 071-00006
Seymour, Jackson County
Case No. 2021-28186-A

Qualified offer of settlement: inadmissible pursuant to Rule 408 of the Ind. Rules of Evidence. IDEM asserts that any offer to compromise a claim or any acceptance of such offer does not bind or obligate the parties of this enforcement action in the absence of a final order of the agency.

Dear Gregory Mourat:

This is to advise that the Indiana Department of Environmental Management (“IDEM”) has conducted an investigation of Valeo North America, Inc. located at 1231 A Avenue North in Seymour, Indiana. As a result of information obtained during that investigation, IDEM has made a preliminary determination that a violation of an environmental permit condition exists. Pursuant to IC 13-30-3-3, enclosed please find a Notice of Violation that sets forth the alleged violation, and a proposed Agreed Order which constitutes a qualified offer of settlement.

You may request a settlement conference to discuss the allegations and the actions necessary to correct and resolve the violation, which may include injunctive relief and the establishment of a compliance schedule. Payment of a civil penalty will also be discussed. The civil penalty amount noted in the proposed Agreed Order contains a preliminary penalty figure for settlement discussion purposes only and is based on penalty calculations associated with the alleged violation set forth in the Notice of Violation. A portion of the civil penalty may be offset by performing an approved Supplemental Environmental Project (SEP). Typical SEPs have included pollution prevention, pollution control, and environmental restoration projects. A copy of IDEM’s SEP policy may be obtained from this office or at IDEM’s website at www.IN.gov/idem.



A State that Works

The individual signing the enclosed Agreed Order should be the President of the company or other authorized signatory. The timely entry into an Agreed Order, which saves you and IDEM time and resources, may lead to a reduction in the civil penalty.

IDEM is not required to extend the offer of entry into an Agreed Order for more than sixty days. You may enter into an Agreed Order without admitting that the violation occurred. If an Agreed Order is not entered into, IDEM may proceed to issue a unilateral notice and order requiring compliance with the environmental permit, including payment of a civil penalty. Please contact me at 317-232-8412 or LHayhurs@idem.in.gov if you have any questions or if you wish to request a settlement conference.

Sincerely,

A handwritten signature in black ink that reads "Lisa Ward". The signature is written in a cursive, flowing style.

Lisa Ward
Case Manager
Enforcement Section
Office of Air Quality

Enclosures:

cc: Molly Harden, EHS Manager, Valeo North America, Inc., Molly.Harden@Valeo.com
Nathan Frank, US EPA Region 5
Lisa Ward, Compliance and Enforcement Branch, OAQ
Mark Amick, IDEM Southeastern Regional Office
Randall Hoffman, Compliance and Enforcement Branch, OAQ
<http://www.IN.gov/idem>



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June 19, 2024

NOTICE OF VIOLATION

Via Electronic Mail:

Via Certified Mail#9589 0710 5270 0682 2480 25

To: Valeo North America, Inc.
Attn: Gregory Mourat, Regional
Operations Vice President
150 Stephenson Highway
Troy, MI 48083
gregory.mourat@valeo.com

To: CT Corporation System, Registered
Agent
334 North Senate Avenue
Indianapolis, IN 46204

Case No. 2021-28186-A

Pursuant to Indiana Code ("IC") 13-30-3-3, the Indiana Department of Environmental Management ("IDEM") issues this Notice of Violation. Based on an investigation including the review of a stack test report conducted by an IDEM representative, IDEM has reason to believe Valeo North America, Inc. ("Respondent") violated an environmental permit condition. The violation is based on the following:

1. Respondent is Valeo North America, Inc., which owns and operates a stationary source producing automotive plastic lighting assemblies with Plant ID No. 071-00006, located at 1231 A Avenue North in Seymour, Jackson County, Indiana ("Site").
2. Pursuant to Part 70 Permit No. 071-43882-00006 ("Permit"), Condition D.1.1(a), Respondent shall operate a thermal oxidizer system with a minimum Volatile Organic Compound ("VOC") destruction efficiency of 95% to control the VOC emissions from Flow Coating Line Emission Unit #6.

Respondent conducted a stack test on July 21, 2021 that demonstrated a VOC destruction efficiency of 92.4% which is below the permitted destruction efficiency of 95%, in violation of Permit, Condition D.1.1(a).

Pursuant to IC 13-30-3-3, the Commissioner herein provides notice that the violation may exist and offers an opportunity to enter into an Agreed Order providing for the actions required to correct the violation and, as necessary and appropriate, for the payment of a civil penalty. The Commissioner is not required to extend this offer for more than sixty (60) days.

Pursuant to IC 13-30-3-3, an alleged violator may enter into an Agreed Order without admitting the violation occurred. IDEM encourages settlement by Agreed Order, thereby resulting in quicker correction of the environmental violation and avoidance of extensive

litigation. Timely settlement by Agreed Order may result in a reduced civil penalty. Also, settlement discussions will allow Respondent the opportunity to present any mitigating factors that may be relevant to the violation.

If an Agreed Order is not entered into within sixty (60) days of receipt of this Notice of Violation, the Commissioner may issue a Notice and Order under IC 13-30-3-4 containing the actions that must be taken to correct the violation and requiring the payment of an appropriate civil penalty. Pursuant to IC 13-30-4-1, the Commissioner may assess penalties of up to \$25,000 per day for each violation.

Please contact Lisa Ward at 317-232-8412 or LHayhurs@idem.in.gov within fifteen (15) days after receipt of this Notice to discuss resolution of this matter.

For the Commissioner:



Date: 6-19-24

Janusz Johnson, Chief
Compliance and Enforcement Branch
Office of Air Quality

cc: Molly Harden, EHS Manager, Valeo North America, Inc.,
Molly.Harden@Valeo.com
Nathan Frank, US EPA Region 5
Jackson County Health Department
Lisa Ward, Compliance and Enforcement Branch, Office of Air Quality
Mark Amick, IDEM Southeast Regional Office
Randall Hoffman, Compliance and Enforcement Branch, OAQ
IDEM Public File

From: [Molly HARDEN](#)
To: [ROBERTS, GOLDIE](#)
Cc: gregory.mourat@valeo.com; [HAYHURST, LISA](#); [Amick, Mark](#)
Subject: Re: Valeo North America, Inc. (#28186-A) Notice of Violation & Proposed Agreed Order
Date: Wednesday, June 19, 2024 8:14:21 AM

**** This is an EXTERNAL email. Exercise caution. DO NOT open attachments or click links from unknown senders or unexpected email. ****

We have received the electronic files and will reach out to Lisa.

Thank you,

Molly HARDEN

Site HSE Manager

+18125245237

+18124987338

molly.harden@valeo.com

1231 A Avenue North - 47274 - Seymour (UNITED STATES)



On Wed, Jun 19, 2024 at 7:28 AM ROBERTS, GOLDIE <GROBERTS@idem.in.gov> wrote:

**Subject: Cover Letter/Notice of Violation
Valeo North America, Inc. – 071-00006**

Dear Gregory Mourat:

Please find attached a PDF copy of the Cover Letter, Notice of Violation, and Proposed Agreed Order issued for Valeo North America, Inc., Jackson County, Air Enforcement Case #2021-28186-A also sent today via Certified Mail to CT Corporation System, Registered Agent. This notice is provided in accordance with IC 13-30-3-3 that violation[s] may exist at Valeo North America, Inc. and offers an opportunity to enter into an Agreed Order to correct the violation[s]. The Commissioner is not required to extend this offer for more than sixty (60)

days.

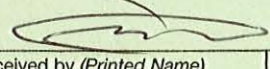

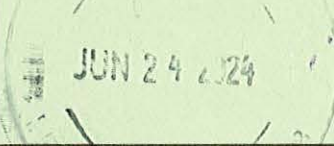
To discuss this matter, please contact Lisa Ward, Case Manager at (317) 232-8412 or lhayhurs@idem.in.gov within fifteen (15) days after receipt of this email.

Please confirm your receipt of these electronic documents.

Thank you

Goldie Roberts
Administrative Assistant
IDEM - Office of Air Quality
Compliance & Enforcement Branch
317-233-5523
groberts@idem.in.gov

This e-mail message is intended for the internal use of the intended recipient(s) only. The information contained herein is confidential/privileged. Its disclosure or reproduction is strictly prohibited. If you are not the intended recipient, please inform the sender immediately, do not disclose it internally or to third parties and destroy it. In the course of our business relationship and for business purposes only, Valeo may need to process some of your personal data. For more information, please refer to the Valeo Data Protection Statement and Privacy notice [available on Valeo.com](http://www.valeo.com)

| SENDER: COMPLETE THIS SECTION | COMPLETE THIS SECTION ON DELIVERY |
|--|--|
| <ul style="list-style-type: none"> ■ Complete items 1, 2, and 3. ■ Print your name and address on the reverse so that we can return the card to you. ■ Attach this card to the back of the mailpiece, or on the front if space permits. | <p>A. Signature <input type="checkbox"/> Agent <input type="checkbox"/> Addressee</p> <p>X </p> <p>B. Received by (Printed Name) C. Date of Delivery</p> |
| <p>1. Article Addressed to:</p> <p>60-02-A/gjr NOV/PAO 2021-28186-A</p> <p>CT CORPORATION SYSTEM REGISTERED AGENT 334 N SENATE AVE INDIANAPOLIS IN 46204</p>  <p>9590 9402 8243 3030 3289 81</p> | <p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No</p> <p style="text-align: center;"></p> <p>3. Service Type <input type="checkbox"/> Priority Mail Express® <input type="checkbox"/> Registered Mail™ <input type="checkbox"/> Registered Mail Restricted Delivery <input type="checkbox"/> Signature Confirmation™ <input type="checkbox"/> Signature Confirmation Restricted Delivery</p> <p><input type="checkbox"/> Adult Signature <input type="checkbox"/> Adult Signature Restricted Delivery <input checked="" type="checkbox"/> Certified Mail® <input type="checkbox"/> Certified Mail Restricted Delivery <input type="checkbox"/> Collect on Delivery <input type="checkbox"/> Collect on Delivery Restricted Delivery <input type="checkbox"/> Mail Restricted Delivery</p> |
| <p>2. Article Number (Transfer from service label)</p> <p>9589 0710 5270 0682 2480 25</p> | |
| <p>PS Form 3811, July 2020 PSN 7530-02-000-9053 Domestic Return Receipt</p> | |