

Ford Motor Company Flat Rock Assembly Plant 1 International Drive Flat Rock, MI 48134

March 9, 2022

Mr. Jonathan Lamb Air Quality Division Michigan Department of Environment, Great Lakes and Energy, Detroit District 3058 West Grand Boulevard, Suite 2-300 Detroit, Michigan 48202

Subject: Response to Violation Notice Dated February 18, 2022 Ford Motor Company Flat Rock Assembly Plant Renewable Operating Permit MI-ROP-N0929-2018

Dear Mr. Lamb:

This letter is in response to the Violation Notice dated February 18, 2022 regarding alleged violations of R336.1910 and ROP No. MI-ROP-N0929-2018 EU-TOPCOAT Special Condition IV.1, EU-ECOAT Special Condition IV.1, and EU-GUIDECOAT Special Condition IV.1.

Ford Motor Company Flat Rock Assembly Plant (Flat Rock Assembly Plant) conducted its annual stack test on December 7, 2021, as required by the Outlet Concentration Monitoring Plan included in Renewable Operating Permit (ROP) No. MI-ROP-N0929-2018. The results of the stack test, provided to EGLE on February 4, 2022, indicated that at the time of the test, the VOC outlet concentration from the regenerative catalytic oxidizer (RCO) system was approximately 10.4 ppm, and the destruction efficiency of two of the three RCO units was below 95 percent. The permit requires that the RCO maintain a minimum VOC destruction efficiency of 95 percent or an average outlet concentration of less than or equal to 5 ppm as propane, under the Special Conditions identified above.

Upon receiving the results, Flat Rock Assembly Plant immediately began investigating the root cause of the elevated VOC outlet concentration as well as the elevated presence of methane, which can be an indication of inefficient combustion, and took the following actions the week of January 31:

- <u>Damper Leakage</u>: Inlet damper leakage was evaluated and determined not to be a possible source of the elevated VOC concentration. No corrective actions needed.
- <u>Valve Frequency</u>: The valve frequency was verified to be in the appropriate range. No corrective actions needed.
- <u>RCO Burners</u>: The burners were evaluated and it was determined that the back burners were underutilized. The back burner temperature setpoints were adjusted to improve burner efficiency and reduce methane emissions.
- <u>Air Supply House Burners</u>: The air supply house profile plates were evaluated. Three of the profile plates were adjusted due to low pressure drop recordings, in order to ensure natural gas is fully burned in order to reduce methane emissions.
- <u>RCO Temperature Set Points</u>: Temperature set points were increased to 1320 degrees F.

To demonstrate that the actions taken are sufficient to meet the conditions of ROP No. MI-ROP-N0929-2018, Flat Rock Assembly Plant plans to conduct an OCM stack test on April 12, 2022 and the 2022 annual Destruction Efficiency stack test on April 20, 2022.

To prevent reoccurrence, Flat Rock Assembly Plant will continue to conduct the regular preventative maintenance actions, as outlined in the Malfunction Abatement Plan and O&M plan incorporated into ROP No. MI-ROP-N0929-2018.

If you have questions or require additional information, please contact Katie Ernst at (248) 496-4353 or email at kholcom3@ford.com.

Sincerely,

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Mark Shkoukani Plant Manager

CC:

Ms. Jenine Camilleri Enforcement Unit Supervisor Michigan Department of Environment, Great Lakes and Energy, Air Quality Division