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FCE

DEPARTMENT OF ENVIRONMENTAL QUALITY  
AIR QUALITY DIVISION

FCE Summary Report

Facility : Ford Motor Company - Flat Rock Assembly	SRN : N0929
Location : 1 INTERNATIONAL DR	District : Detroit
	County : WAYNE
City : FLAT ROCK State: MI Zip Code : 48134	Compliance Status : Compliance
Source Class : MAJOR	Staff : Jonathan Lamb
FCE Begin Date : 6/21/2018	FCE Completion Date : 6/21/2019
Comments : FCE, FY 2019	

List of Partial Compliance Evaluations :

Activity Date	Activity Type	Compliance Status	Comments
06/21/2019	Scheduled Inspection	Compliance	Scheduled inspection, FY 2019
05/23/2019	Other	Compliance	Review of 2018 MAERS

Activity Date	Activity Type	Compliance Status	Comments
05/20/2019	ROP SEMI 2 CERT	Compliance	2018 Semi-Annual 2 ROP Compliance Certification Report. Facility reported 11 deviations during the compliance period. The facility reported periodic by-pass damper openings in the booths and ovens due to mechanical or electrical failures. The individual releases were of relatively short duration: total time by-pass dampers were opened and vented to atmosphere was less than 5 hours, with no event exceeding 82 minutes. Facility appeared to take proper actions to identify the cause of the damper openings and correct the deviation to minimize the duration and occurrence of openings. Facility also reported a deviation for failing to test for Ecoat Oven CE within 180 days of permit issuance; testing was due by 11/8/18 but was not performed until 12/11/18. The facility reported a deviation for failing to perform an annual tune-up of MSC Steam Boiler L-51201 within 13 months of the previous tune-up; tune-up was due 11/21/18 but was not performed until 12/31/18. Based on a review of the reported deviations and the actions taken by the facility to resolve the violations, AQD has determined that this report is in substantial compliance.
05/20/2019	ROP Annual Cert	Compliance	2018 Annual ROP Compliance Certification Report. 15 deviations were reported during the compliance period. Evaluation of the deviations was performed during the review of the Semi-Annual ROP Compliance Reports.
05/20/2019	MACT (Part 63)	Compliance	Semi-annual compliance report for 40 CFR 63, Subpart IIII (Auto MACT). Compliance option stated in 40 CFR 63.3091(b) is used since the e-coat does not contain reportable HAPs. Facility reports no deviations to Auto MACT requirements.
05/20/2019	MACT (Part 63)	Compliance	40 CFR 63 Subpart DDDDD (Boiler MACT) Notification of Compliance and Unit Tune-Up for units subject to major source Boiler MACT.

Activity Date	Activity Type	Compliance Status	Comments
05/20/2019	MACT (Part 63)	Compliance	Semi-annual compliance report for 40 CFR 63, Subpart PPPP (Plastics MACT). The plastic coating operation was shut down in October 2017, so no coatings have been used during the compliance period.
05/20/2019	CAM Excursions/Exceedances	Compliance	Facility is certifying compliance with CAM requirements except for the excursions described in the Title V deviation forms.
05/06/2019	ROP Qrtly Cert	Compliance	Emission/material usage report, 1st Quarter 2019, as required per ROP No. MI-ROP-N0929-2018, FG-FACILITY, VII.4. Facility reports compliance with all requirements of the Auto MACT. Further review of emission and material usage data will be performed as part of the next FCE. Note: all operations associated with the plastic molding and painting operations have permanently ceased, so no emissions from these operations are reported.
02/08/2019	ROP Qrtly Cert	Compliance	Emission/material usage report, 4th Quarter 2018, as required per ROP No. MI-ROP-N0929-2018, FG-FACILITY, VII.4. Facility reports compliance with all requirements of the Auto MACT. Note: all operations associated with the plastic molding and painting operations have permanently ceased, so no emissions from these processes are reported.
01/15/2019	Stack Test	Compliance	Results of capture efficiency testing of the E-Coat Oven. Testing was performed by Montrose Air Quality Services on December 11, 2018; neither AQD Detroit field staff nor AQD-TPU staff were available to observe testing. Results show an E-Coat Oven capture efficiency of 98.8%. This value will be used in calculating monthly emissions.

Activity Date	Activity Type	Compliance Status	Comments
01/15/2019	Stack Test	Compliance	<p>Results of RCO Outlet Concentration Monitoring received on January 11, 2019. Testing was performed on November 7 and 8, 2018, by Montrose Air Quality Services; Jon Lamb, AQD Detroit Office, was on site to observe testing on November 7; John Lauch, Susan Hicks, and Jamie Hayward of Ford were also on site during testing. Reported results show the following average outlet VOC concentrations: RCO A = 4.7 ppmv @ 1,143°F; RCO B = 6.1 ppmv @ 1,274°F, 3.9 ppmv @ 1,326°F, and 1.3 ppmv @ 1,443°F; and RCO C = 3.1 ppmv @ 1,026°F. RCO B was tested at different combustion temperatures to determine the temperature needed to achieve compliance. OCM testing is for monitoring purposes, not to demonstrate compliance, but results appear to show VOC outlet concentrations in compliance with MI-ROP-N0929-2011a, EU-Topcoat, IV.1, which requires the company to meet either an outlet concentration of 5 ppm VOC or demonstrate 95% destruction efficiency for the RCO Control System.</p>
12/26/2018	Stack Test	Compliance	<p>Transfer Efficiency (TE) and Booth/Oven Capture Efficiency (CE) results based on testing performed Oct. 8 and 9, 2018. Testing was performed by JLB Industries, LLC, on the 3-Wet Coating Line #2 using Ford Mustang as the representative model and Dark Gray Prime, Absolute Black Basecoat, and Clearcoat as the representative coatings. Testing was observed by Jon Lamb, AQD, and Susan Hicks, Ford Environmental. The following results were reported: Average TE: 75.9%; Prime Booth CE: 84.1%; Prime Oven CE: 10.6%; Basecoat Booth CE: 76.6%; Basecoat Oven CE: 11.6%; Clearcoat Booth CE: 40.6%; and Clearcoat Oven CE: 32.5%. Results are to be used in monthly emission calculations.</p>

Activity Date	Activity Type	Compliance Status	Comments
11/01/2018	ROP Qrtly Cert	Compliance	Emission/material usage report, 3rd Quarter 2018, as required per ROP No. MI-ROP-N0929-2018, FG-FACILITY, VII.4. Facility reports compliance with all requirements of the Auto MACT. Note: all operations associated with the plastic molding and painting operations have permanently ceased, so no emissions from these processes are reported.
10/09/2018	Stack Test Observation	Compliance	Transfer Efficiency/Capture Efficiency Testing
09/12/2018	ROP Qrtly Cert	Compliance	Emission/material usage report, 2nd Quarter 2018, as required per ROP No. MI-ROP-N0929-2011a, FG-FACILITY, VII.4. Facility reports compliance with all requirements of the Auto MACT. Note: all operations associated with the plastic molding and painting operations have permanently ceased, so no emissions from these processes are reported.
09/11/2018	ROP Semi 1 Cert	Compliance	2018 Semi-Annual 1 ROP Compliance Certification Report for the time period January 1-June 30, 2018. Facility reported 4 deviations during the compliance period. All deviations reported were for periodic by-pass damper openings in the booths and ovens due to mechanical or electrical failures. The individual releases were of relatively short duration: total time by-pass dampers were vented to atmosphere was 8.5 hours, with no single event exceeding 150 minutes. Facility appeared to take proper actions to identify the cause of the damper openings and correct the deviation to minimize the duration and occurrence of openings. Based on a review of the reported deviations and the actions taken by the facility to resolve the violations, AQD has determined that this report is in substantial compliance.

Activity Date	Activity Type	Compliance Status	Comments
09/11/2018	MACT (Part 63)	Compliance	Semi-annual compliance report for 40 CFR 63, Subpart IIII (Auto MACT). Compliance option stated in 40 CFR 63.3091(b) is used since the e-coat does not contain HAPs. Facility reports no deviations to Auto MACT requirements.
09/11/2018	MACT (Part 63)	Compliance	Semi-annual compliance report for 40 CFR 63, Subpart PPPP (Plastics MACT). This process has been shut down, so no coatings have been used during the compliance period.
09/11/2018	CAM Excursions/Exceedances	Compliance	Facility is certifying compliance with CAM requirements except for the excursions described in the Title V deviation forms.
09/04/2018	MACT (Part 63)	Compliance	40 CFR 63 Subpart DDDDD (Boiler MACT) Notification of Compliance and Unit Tune-Up for units subject to major source Boiler MACT.

Name:

V. Long

Date:

9-24-19

Supervisor:

JK