



Ford Motor Company
Flat Rock Assembly Plant

1 International Drive
Flat Rock, MI 48134



September 17, 2015

Mr. Jonathan Lamb
Senior Environmental Quality Analyst, Air Quality Division
Michigan Department of Environmental Quality (MDEQ)
3058 West Grand Boulevard Suite 2-300
Detroit, Michigan 48202

Subject: Ford Motor Company Flat Rock Assembly Plant (FRAP) – MI-ROP-N0929-2011a
Response to Violation Notices Dated August 18 and 27, 2015

Dear Mr. Lamb:

This letter is in response to the Notices of Violation dated August 18 and 27, 2015 for allegedly violating rule/permit condition R 336.1901(b) of our permit ROP MI-ROP-N0929-2011a Section A-General Condition 12(b).

FRAP has undertaken a number of actions to address odors that might be coming from the plant. We have been actively reviewing potential causes of odors in the community by logging complaints to assess timing, character, and strength of the odor impact on the community and then reviewing plant operations during complaint periods to identify activities that may have resulted in the complaint. We also are dispatching personnel to the community soon after being notified by the agency of potential odors to experience the odor impact and determine whether it could be coming from a plant source. FRAP has also taken the following actions to identify, reduce, or eliminate potential sources of odors.

Action	Status/Comments
Inspect all of our control by-pass dampers and associated ductwork to insure integrity/closure to atmosphere and making necessary repairs.	Thirty dampers (i.e. fifteen dampers to atmosphere and fifteen dampers to control) were inspected. All dampers to atmosphere were confirmed to be in the closed position. One of the dampers to control (Exhaust Fan B8) wasn't functioning properly and was temporarily fixed on August 30. A more permanent and robust repair was put in place during the Labor Day weekend.
Confirm paint process spray booths not currently in use are clean and in some cases blanked off to atmosphere.	In-active body assembly paint process spray booth stacks have been appropriately blanked off.
Clean, drain, and disinfect stagnant water sources associated with our plastic painting process.	A temporary fix for preventing water from becoming stagnant in the plastics paint pit tunnel was put in place March 22 with a permanent fix implemented on June 24.
Re-emphasize to employees that all doors in areas that can emit odors to the outside be closed immediately after use.	A new Plastics Paint Sludge Pit door has been ordered to replace the existing door which is in disrepair. It is scheduled to be installed on or before September 25.
Retain a third party environmental consultant to assist in identifying potential sources of "cat urine" type odors and develop a mitigation strategy if needed.	Results from the plant investigation were provided to FRAP on September 15 th . FRAP is currently reviewing the data.
Retain a third party environmental consultant to assess our impact on the community, identify potential sources of the "paint/solvent" odor, and guide us on additional actions should they be necessary.	FRAP is in the process of hiring Odor Science & Engineering (OS&E) to complete this study. Our intent is to complete this work on or before mid-October of this year but will be subject to OS&E's availability.

Retain a third party environmental consultant to conduct VOC and NH3 emission testing on the plastic operation tall stack.

FRAP is the process of hiring BTEC to perform this testing. The results will be used to generate an air dispersion model to evaluate the community odor impact. Our intent is to complete this work on or before mid-October of this year but will be subject to BTEC's availability.

We believe the actions FRAP has taken to date have reduced the impact on the community. At the same time we are continuing to assess our operations for opportunities to continue to reduce odor impacts and will take action as appropriate.

I would like to thank you for allowing us to respond to these violation notices jointly and appreciate your continued cooperation in communicating complaint information to us. We are hopeful that our actions to date have resolved our impact. If you have questions or require additional information, please contact Terry Filipiak at (734) 782-7797 or by email at tfilipia@ford.com.

Sincerely,



Jeffrey Carrier
Plant Manager

cc: Ms. Lynn Fiedler, MDEQ
Ms. Barb Rosenbaum, MDEQ
Ms. Teresa Seidel, MDEQ
Mr. Thomas Hess, MDEQ
Ms. Wilhemina Mclemore, MDEQ
Mr. Jeff Komiski, MDEQ
Mr. Rodrick Gray, FRAP
Ms. Danielle Fenbert, Ford EQO
Mr. John Lauch, Ford EQO