



Ford Motor Company  
Flat Rock Assembly Plant

1 International Drive  
Flat Rock, MI 48134

January 05, 2017

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 Notice Dated December 8, 2016

Dear Mr. Lamb:

This letter is in response to the Notice of Violation dated December 8, 2016 for allegedly violating rule/permit condition R 336.1910 of our permit ROP MI-ROP-N0929-2011a, EU-Topcoat, Special Condition IV.1.

In response to the most recent compliance test results, which were submitted to your office on December 2 and indicated a combined RTO/RCO outlet VOC concentration of 6 ppm, FRAP has performed or plans to implement the following corrective actions:

1. Conducted an inspection of all 36 RCO inlet and outlet valves including verification of proper functionality of the air seal valves/linkages during the week of December 26, 2016. Any valves that were found to be out of specification were readjusted.
2. Verify if the work associated with Item 1 above proved successful via an Outlet Concentration Monitoring (OCM) test.
3. If Item 2 proves unsuccessful, redistribute the flow rates in RCO Units A, B, C by incrementally increasing the flow rates in RCO A and C while at the same time decreasing the flow rate in RCO B to, in effect, increase the RCO B residence time. During the redistribution, VOC concentrations will be monitored via an OCM test until a 5 ppm or below combined outlet concentration is attained and repeatable.
4. If the items described above prove unsuccessful, RCO B will be converted to an RTO and the performance will be verified via an OCM test.

The timing for Items 2 through 4 above is mid-January, 2017 subject to vendor availability. We will provide your office with the appropriate OCM test protocol documentation as soon as test dates are confirmed. In addition, upon successful implementation of one of the actions identified above, FRAP will provide your office with the appropriate compliance test protocol and associated test dates.

As outlined above, FRAP is aggressively pursuing a control strategy that satisfies our compliance obligations.

If you have questions or require additional information, please contact Terry Filipiak at (734) 782-7797 or by email at [tfilipia@ford.com](mailto:tfilipia@ford.com).

Sincerely,

Jeffrey Carrier  
Plant Manager

cc: Mr. Thomas Maza, MDEQ  
Ms. Wilhemina McLemore, MDEQ  
Mr. Jeff Korniski, MDEQ  
Ms. Lynn Fiedler, MDEQ  
Ms. Mary Ann Dolehanty, MDEQ  
Mr. Chris Ethridge, MDEQ  
Mr. Thomas Hess, MDEQ