SEP - 6 2017

Air Quality Division Detroit Office



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

August 30, 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 August 15, 2017

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Dear Mr. Lamb:

This letter is in response to the Notice of Violation dated August 15, 2017 for allegedly violating rule/permit condition R 336.1901(b) of our permit ROP MI-ROP-N0929-2011a Section A-General Condition 12(b).

As you are aware, FRAP has undertaken a number of actions to identify and reduce odors and potential causes of odors in the community. While these actions have reduced the potential for odors in the community, FRAP continues to regularly monitor and assess our operations for opportunities to further reduce potential odor impacts. Each time a complaint is received; maintenance personnel inspect our operating processes and emissions equipment for any damage and verify that painting operations are within normal operating parameters. After FRAP became aware of the complaints on August 9, 2017, the equipment on the roof was inspected and all painting operations were thoroughly reviewed, however no issues or abnormal operating conditions were identified.

Additionally to investigate the alleged cat urine complaint, the booth tanks under the decommissioned north plastics paint line were inspected for stagnant water. The area was found to be dry and clean. Also, bacteria in the plastic paint pit sludge water were tested for and the paint booth scrubber efficiency measured. Both were within normal operating parameters. As a proactive measure, additional bleach and biocide were added to both the body and plastics paint sludge pit water.

Ford appreciates the continued timely notifications of odor complaints that will better allow FRAP to evaluate potential odor concerns. Where practicable, an immediate notification would allow Ford personnel to verify potential odors attributed to our operations in the community and conduct a more timely/relevant review of our operations.

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. Mary Ann Dolehanty, DEQ Mr. Christopher Ethridge, DEQ Mr. Thomas Hess, MDEQ

Ms. Wilhemina Mclemore, MDEQ

Mr. Jeff Korniski, MDEQ

Ms. Lisa Hansen, Ford EQO

Ms. Ann McCormick, Ford EQO