



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
DETROIT FIELD OFFICE



DAN WYANT
DIRECTOR

October 19, 2015

Mr. Jeffrey Carrier, Plant Manager
Ford Motor Company - Flat Rock Assembly Plant
1 International Drive
Flat Rock, Michigan 48134-9401

SRN: N0929, Wayne County

Dear Mr. Carrier:

VIOLATION NOTICE

On October 15 and 16, 2015, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), investigated complaints regarding nuisance odors alleged to be the result of operations at Ford Motor Company – Flat Rock Assembly Plant, located at 1 International Drive, Flat Rock, Michigan. The purpose of these investigations was to determine Flat Rock Assembly Plant's compliance with the requirements of the federal Clean Air Act; Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451); the administrative rules; the conditions of Renewable Operating Permit (ROP) number MI-ROP-N0929-2011a; and to investigate complaints of nuisance odors received on October 14, 15, and 16, 2015.

AQD staff performed the investigations and observed the following air pollution violation:

Process Description	Rule/Permit Condition Violated	Comments
Automobile Assembly Plant	R 336.1901(b); ROP No. MI-ROP-N0929-2011a, Section A – General Condition 12(b)	Strong paint/solvent and “cat urine” odors observed emitting from the facility and impacting nearby neighborhoods.

During the investigations performed on October 15 and 16, 2015, I detected strong and consistent (Level 3 and 4) paint/solvent odors and odors similar to “cat urine” in residential areas downwind of Flat Rock Assembly Plant which were determined to be attributable to the facility's operations. Odors were not observed upwind of the facility.

R 336.1901(b) states, in part:

“A person shall not cause or permit the emission of an air contaminant in quantities that cause injurious effects to human health and property, or the unreasonable interference with the comfortable enjoyment of life and property.”

In my professional judgment, the odors observed were of sufficient intensity, frequency and duration so as to constitute a violation of R 336.1901(b) and Section A, General Condition 12(b) of ROP No. MI-ROP-N0929-2011a.

Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by November 9, 2015 (which coincides with 21 calendar days from the date of this letter). The written response should include: the date the violation occurred; an explanation of the causes and duration of the violation; whether the violation is ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violation and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

If Ford Motor Company – Flat Rock Assembly Plant believes the above observations or statements are inaccurate or do not constitute violations of the applicable legal requirements cited, please provide appropriate factual information to explain your position.

Thank you for your attention to resolving the violation cited above. Should you require any further information, please contact me.

Sincerely,



Jonathan Lamb
Senior Environmental Quality Analyst
Air Quality Division
313-456-4683

cc: Ms. Lynn Fiedler, DEQ
Ms. Mary Ann Dolehanty, DEQ
Ms. Teresa Seidel, DEQ
Mr. Thomas Hess, DEQ
Ms. Wilhemina McLemore, DEQ
Mr. Jeff Korniski, DEQ