



GRETCHEN WHITMER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF  
ENVIRONMENT, GREAT LAKES, AND ENERGY  
DETROIT DISTRICT OFFICE



LIESL EICHLER CLARK  
DIRECTOR

February 18, 2022

Mr. Mark Shkoukani, Plant Manager  
Ford Motor Company – Flat Rock Assembly Plant  
1 International Drive  
Flat Rock, Michigan 48134-9401

SRN: N0929, Wayne County

Dear Mr. Shkoukani:

**VIOLATION NOTICE**

On February 8, 2022, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), received the results of volatile organic compound (VOC) destruction efficiency (DE) testing of the regenerative catalytic oxidizer (RCO) system conducted on December 7, 2021, at Ford Flat Rock Assembly Plant, located at 1 International Drive, Flat Rock, Michigan. The purpose of this test was to determine Ford 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, and the conditions of Renewable Operating Permit (ROP) number MI-ROP-N0929-2018.

Based on a review of the test results, AQD staff determined the following violations:

Process Description	Rule/Permit Condition Violated	Comments
Topcoat, Electrocoat, and Guidecoat coating operations controlled by a system of three catalytic oxidizers and one thermal oxidizer (RCO system).	ROP No. MI-ROP-N0929-2018, EU-TOPCOAT, Special Condition IV.1; ROP No. MI-ROP-N0929-2018, EU-ECOAT, Special Condition IV.1; ROP No. MI-ROP-N0929-2018, EU-GUIDECOAT, Special Condition IV.1; R 336.1910	Facility reported an average DE of 82.9% and average VOC outlet concentration of 10.4 ppm, and therefore neither met the minimum average DE of 95% nor the maximum average outlet concentration of 5 ppm VOC, as propane.

The test results show that the RCO system failed to meet either the minimum average VOC destruction efficiency of 95% or the maximum average VOC outlet concentration of 5 ppm, as propane, as allowed per ROP No. MI-ROP-N0929-2018, EU-TOPCOAT, EU- ECOAT, and EU-GUIDECOAT, Special Condition IV.1.

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This also constitutes a violation of Act 451, Rule 910, which requires that an air-cleaning device shall be installed, maintained, and operated in a satisfactory manner and in accordance with the administrative rules and existing law.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by March 11, 2022 (which coincides with 21 calendar days from the date of this letter). The written response should include: the date the violations occurred; an explanation of the causes and duration of the violations; whether the violations are ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violations and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

Please submit the written response to the EGLE, AQD, Detroit District, at 3058 West Grand Boulevard, Suite 2-300, Detroit, Michigan 48202, and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor, at the EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Ford 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 violations cited above. Should you require any further information, please contact me.

Sincerely,



Jonathan Lamb  
Senior Environmental Quality Analyst  
Air Quality Division  
313-348-2527

cc: Ms. Mary Ann Dolehanty, EGLE  
Dr. Eduardo Olaguer, EGLE  
Mr. Christopher Ethridge, EGLE  
Ms. Jenine Camilleri, EGLE  
Ms. Karen Kajiya-Mills, EGLE  
Mr. Matthew Karl, EGLE  
Dr. April Wendling, EGLE  
Mr. Jeff Korniski, EGLE  
Ms. Maureen Conner, EGLE