

**Surface Coating: Automobile and Light-Duty Truck MACT Standard
Organic HAP Work Practices Plan
Michigan Assembly Plant
Ford Motor Company**

The Automobile and Light-Duty Truck Surface Coating Maximum Achievable Control Technology Standard (40 CFR 63.3094), "Auto MACT", requires the development and implementation of a work practice plan. This work practice plan identifies those actions required to minimize Hazardous Air Pollutant (HAP) emissions from the storage, mixing, and conveying of coatings, thinners, cleaning materials, and waste materials used by or generated by the coating operations within the paint shop at the plant. Specifically, the plan addresses coatings and thinners, cleaning materials, and waste materials listed below.

In general, all organic HAP containing coatings, thinners, cleaning materials, and waste materials are stored in closed containers until used. Additionally, all such materials are transported in either closed containers or through piping to the point of use or disposal to minimize the risk of spills from such materials. Places where such materials are transferred from storage containers to points of use are contained and operated by trained personnel to ensure that such materials are not spilled and, in case of such a spill, are contained and cleaned up immediately.

This work practice plan has been integrated into the plant's Environmental Management System. This system includes periodic inspections to ensure compliance with this work practice. Periodic training is conducted to ensure that affected employees are aware of these standard operating practices. When necessary, deviations from these work practices will be reported in the plant's Renewable Operating Permit deviation report as required by the Auto MACT Standard.

GENERAL HANDLING AND HOUSEKEEPING REQUIREMENTS

In general, all coatings, solvents, and cleaning materials associated with coating operations including general housekeeping in the areas where these coating operations are housed are managed using the techniques listed below in order to minimize HAP emissions:

- (A) Keeping solvent-laden articles (cloths, paper, plastic, rags, wipes, and similar items) in covered containers when not in use.
- (B) Storing new and used solvents in closed containers.
- (C) Transferring of solvents in a manner to minimize the risk of spills through the use of closed containers during transfer or through piping to the point of use or disposal.
- (D) Mixing tanks or vessels, other than day tanks equipped with continuous agitation systems, are kept closed when adding, removing, or mixing the contents.

WIPE SOLVENTS

Wipe solvents are managed through one or more of the techniques listed below in order to minimize HAP emissions:

- (A) Use of solvent-moistened wipes.
- (B) Keeping solvent containers closed when not in use.
- (C) Keeping wipe disposal/recovery containers closed when not in use.
- (D) Use of tack-wipes.

PURGE SOLVENTS

Purge solvents are managed through one or more of the techniques listed below in order to minimize HAP emissions:

- (A) Air/solvent push-out of coatings and solvent (excluding applicator nozzles and tips).
- (B) Capture and reclaim or recovery of purge materials (excluding applicator nozzles and tips).
- (C) Block painting to the maximum extent feasible.

LINE CLEANING (FLUSH) SOLVENTS

Line cleaning (flush) solvents are managed through one or more of the techniques listed below in order to minimize HAP emissions:

- (A) Keeping solvent containers closed when not in use.
- (B) Recovering and recycling solvents.
- (C) Keeping recovered/recycled solvent containers closed when not in use.

BOOTH GRATE CLEANING

Booth grate cleaning is performed using one or more of the techniques listed below in order to minimize HAP emissions:

- (A) Rinsing with high-pressure water (in place).

BOOTH WALL CLEANING

Spray booth walls cleaning is performed using one or more of the techniques listed below in order to minimize HAP emissions:

- (A) Use of spray-on masking.
- (B) Controlled access to cleaning solvents (lock-out, etc.).

BOOTH EQUIPMENT CLEANING

Cleaning of spray booth equipment in the paint booths is performed using one or more of the techniques listed below in order to minimize HAP emissions:

- (A) Use of covers on equipment (disposable or reusable).
- (B) Use of parts cleaners (off-line submersion cleaning).
- (C) Controlled access to cleaning solvents.

EXTERNAL BOOTH CLEANING

Cleaning of external spray booth areas in the Paint Shop is performed using one or more of the techniques listed below:

- (A) Use of removable floor coverings (paper, foil, plastic, or similar type of material).
- (B) Use of manual and/or mechanical scrubbers, rags, or wipes instead of spray application.
- (C) Use of booties or shoe wraps.
- (D) Controlled access to cleaning solvents.

GENERAL HOUSEKEEPING

The plan must address emissions from housekeeping measures not addressed in the above specific areas through one or more of the techniques listed below.

- (A) Keeping solvent-laden articles (cloths, paper, plastic, rags, wipes, and similar items) in covered containers when not in use.
- (B) Storing new and used solvents in closed containers.
- (C) Transferring of solvents in a manner to minimize the risk of spills.