

A8645

MAWILA

**DEPARTMENT OF ENVIRONMENTAL QUALITY  
AIR QUALITY DIVISION  
ACTIVITY REPORT: Scheduled Inspection**

A864552754

FACILITY: FORD MOTOR CO/ LIVONIA TRANSMISSION		SRN / ID: A8645
LOCATION: 36200 PLYMOUTH RD, LIVONIA		DISTRICT: Detroit
CITY: LIVONIA		COUNTY: WAYNE
CONTACT: Carly Gardiner, Environmental Engineer		ACTIVITY DATE: 03/09/2020
STAFF: Todd Zynda	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: March 9, 2020 Inspection		
RESOLVED COMPLAINTS:		

REASON FOR INSPECTION: Scheduled Inspection  
 INSPECTED BY: Todd Zynda, AQD  
 PERSONNEL PRESENT: Carly Gardiner, Environmental Engineer  
 FACILITY PHONE NUMBER: 734-523-4526  
 FACILITY FAX NUMBER: 734-266-1199

#### FACILITY BACKGROUND

Ford Livonia Transmission Plant (LTP) manufactures transmissions and transmission components for Ford vehicles. LTP has been in operation at the location since 1952, is 3.3 million square feet in area, and employs more than 3,000 people. The facility operates 24 hours a day, 7 days a week.

LTP manufactures front wheel and rear wheel drive transmissions for Ford vehicles. The plant receives prefabricated steel, aluminum, and iron parts from various parts suppliers, machines the parts in drill machines, grinders, lathes, boring machines, and CNC machines, and assembles the machined parts into the final product. The facility refers to the parts, as received, as "Greenstock" parts. Machining predominantly occurs on the housing, gears, shafts, and valve bodies of automatic transmissions. The machined parts are assembled into Ford vehicle transmissions.

#### SOURCE CLASSIFICATION

On May 1, 2018, Ford LTP was issued permit to install (PTI) 34-18. PTI 34-18 includes Title V opt-out limits limiting hazardous air pollutants (HAPs) to less than 8.9 tpy on an individual basis and less than 22.4 tpy on an aggregate basis. Note, HAP emissions from Ford Automatic Transmission New Product Center (ATNPC) and LTP are aggregated per the major source definition in the NESHAP regulations. PTI 34-18 also permanently discontinues the use of EU-BOILER#1, EU-BOILER3 and EU-BOILER4, which previously made the facility a major source under Prevention of Significant Deterioration (PSD) (Michigan Administrative Code, Air Quality Division: Part 18) regulations and Title V, due to the potential to emit of nitrogen oxides in excess of 250 tons per year and 100 tons per year respectively.

Four emergency fire pumps and five emergency generators are subject to the area source MACT Standards for Stationary Reciprocating Internal Combustion Engines promulgated in 40 CFR Part 63, Subparts A and ZZZZ. Three emergency generators are subject to 40 CFR Part 60, Subpart JJJJ – Standards of Performance for Stationary Spark Ignition Internal Combustion Engines.

#### OUTSTANDING CONSENT ORDERS

None

#### OUTSTANDING VNs

None

#### INSPECTION NARRATIVE

On March 9, 2020 AQD staff, Todd Zynda conducted an inspection at Ford LTP located at 36200 Plymouth Road in Livonia, Michigan. The purpose of the inspection was to determine compliance with Federal and State air quality regulations and the conditions of PTI 34-18.

During the inspection, Ms. Carly Gardiner, Environmental Engineer, provided information and a tour of facility operations.

A records request was provided to Ms. Gardiner on March 6, 2020 and records were provided via email on March 13, 2020.

The below list identifies equipment, both removed and operating, at the facility.

Boiler #1 (formerly EU-BOILER#1) – Wickes 144 MMBTU/hr, natural gas fired, installed in 1966. Fuel oil has not been fired for years. The facility does not have fuel tanks or lines installed for the combustion of fuel oil. Use of the boiler was discontinued on December 31, 2016. Natural gas lines feeding the boiler have been cut and are capped.

Boiler #2 - Wickes 96 million BTU/hour coal-fired boiler installed in 1952. No modifications to boiler have occurred. No longer in use as all coal handling equipment has been removed.

Boiler #3 (formerly EU-BOILER#3)– Wickes 97.5 MMBTU/hr heat input, originally coal fired, installed in 1952. Modified in 1995 to allow for the ability to fire No 2 fuel oil and natural gas. Low NOx burners were installed at that time. Fuel oil has not been fired for years. The facility does not have fuel tanks or lines installed for the combustion of fuel oil. Use of the boiler was discontinued on December 31, 2016. Natural gas lines feeding the boiler have been cut and are capped.

Boiler #4 (formerly EU-BOILER#4)– Wickes 97.5 MMBTU/hr heat input, originally coal fired, installed in 1954. Modified in 1995 to allow for the ability to fire No 2 fuel oil and natural gas. The facility does not have fuel tanks or lines installed for the combustion of fuel oil. Use of the boiler was discontinued on December 31, 2016. Natural gas lines feeding the boiler have been cut and are capped.

Coal handling equipment – Removed

Heat treat furnaces (formerly FG-HEATTREAT) – Removed

Tank farm – Fourteen 20,000 to 25,000 gallon capacity above ground storage tanks (automatic transmission fluid) and one 2,000 gallon diesel tank

Wastewater treatment plant (EU-WWTP) - consisting of a 300,000 gallon equalization tank, one 10,000 gallon capacity tank, one 13,000 gallon capacity tank, three 25,000 gallon tanks and a wet packed bed scrubber. Also includes raw material storage tanks for the polymer, caustic, and acid.

WWTP Boiler (natural gas) – 2.511 MMBtu/hr (heat input capacity)

One anodizing line (formerly EU-ANODIZING) for cleaning and rust proofing – Removed

Cold cleaners (formerly FG-COLDCLEANERS) - Located throughout the facility

Paint spray booth

Transmission machining and assembly equipment

Four Diesel Engine Fire Pumps

Eight natural gas fired emergency generators

Groundwater remediation system

Soil vapor mitigation system

Following discussion of facility operations and records request, a tour of the facility was conducted. The tour began with observation of the soil vapor mitigation system. According to Ms. Gardiner, the facility will be adding more collection pits to the soil vapor mitigation system. The catalytic oxidizer treatment has the capacity for additional collection.

The tour continued with observation of a bluing station (R336.1283(2)(d) PTI exempt). The bluing station is used to check for leaks in assembly transmissions. The blue ink is sprayed on portions of the transmission before assembly. The transmission is assembled and run through a series of tests, and then disassembled to look for blue ink locations following the test. Any potential emissions are released to the general in-plant environment.

An example of the "Federal Broach" machine used for heat treatment was observed in the 10R (10 speed, rear) transmission area. The heat treat systems are electrically heated units that includes an electrically heated afterburner. According to Ford, the heat treat systems do not combust any fuel to generate heat in the carburizing process and they do not treat oil coated parts or use oil quenching. During the inspection, it was observed that the units are enclosed, with any potential emissions released to the general in-plant environment.

Following observation of the heat treatment, the new generator (nitrogen pad generator) was observed. The generator was secured behind a locked fence. During the inspection the hour meter was not observed. According to Ms. Gardiner, the generator is brand new and has not been used.

Following observation of the nitrogen pad generator, an example aqueous based cold cleaner was observed. During the inspection the cold cleaner lid was closed and the instructions were posted.

EU-WWTP is a wastewater treatment plant the facility uses to treat waste generated at the site and at the Ford ATNPC. The waste consists predominantly of lubricating oils used by the facility's metal working machinery. The wastewater treatment plant separates water from waste oil. The resulting water is discharged into the city sewer system and the oil is sold to and recycled by a third party. In the wastewater treatment process, wastewater is collected by underground piping and pumped to a 300,000 gallon equalization tank where the pH is adjusted. Next, the waste is transferred to an oil separation tank where the oil is skimmed off of the top. Finally, the skimmed oil is sent to one of the "cook" tanks where it is heated to 180 to 200 °F using steam and treated with sulfuric acid. There are three 25,000 gallon cook tanks and one 10,000 gallon cook tank. Raw material storage tanks are present for acid, polymer, and caustic (sodium hydroxide) materials. The recovered oil is stored in a 13,000 gallon tank and sold to a third party for further processing. Cook tanks and oil storage tanks are covered and vented to the scrubber. At the time of inspection, the scrubber was not in operation as a "cook" was not taking place. According to the scrubber log observed at the time of inspection, the scrubber last operated on March 8, 2020 at 7:00 AM that morning with a pH of the scrubbing solution of 11.87. According to permit files, these tanks have potential to create odors due to generation of H<sub>2</sub>S and other odors associated with bacterial growth in waste.

In addition, the location of the natural gas fired boiler (2.511 MMBtu/hr) was observed in the WWTP area. The boiler was installed following the shutdown of the powerhouse.

During the inspection the powerhouse was not observed. The powerhouse contains Boilers #1 through #4. Boilers #1 through #4 have been permanently shut down but remain in place. During the previous inspection it was observed that the natural gas fuel lines have been cut and capped for Boilers #1, #3 and #4 (see previous inspection report). Boiler #2 was permanently shut down when use of coal was discontinued.

The former inking station that was used to label finished transmissions has been replaced with a laser etching line that cuts an identifier into each transmission. Emissions from metal cutting, grinding, etc. is either released to the general in plant environment or is controlled by various oil-mist collectors. If oil mist collectors vent to the outside ambient air, emissions are controlled by a fabric filter per Rule 285(2)(l)(vi)(C).

The tour concluded with observation of the facility paint booth. The paint booth was not in operation at the time of inspection. Filters were in place. Records of paint usage demonstrating compliance with Rule 287(c) were provided via email on March 13, 2020.

During the inspection, the groundwater remediation system was not observed. The groundwater remediation system was observed during the previous inspection. The remediation system is used to treat trichloroethylene (TCE), dichloroethene (DCE), and vinyl chloride (VC). According to information provided by Ford, the vapor of the air stripper is routed to a catalytic oxidizer equipped with a catalyst selected for halogenated constituents. The facility is claiming Rule 290 for the ground water remediation system.

## APPLICABLE RULES/PERMIT CONDITIONS

### PTI 34-18

Permit conditions have been paraphrased for brevity. Please see the PTI for conditions in their entirety.

### EU-WWTP

SC II. 1. SC VI. 2. **COMPLIANCE.** Waste oil processed shall not exceed 4.0 million gallons per year on a 12-month rolling basis. The highest 12-month rolling waste oil processed from January 2018 through February 2020 occurred in September 2019 at 348,598 gallons.

SC III. 1. **COMPLIANCE.** Heat process tanks and the oil storage tanks shall be closed and exhausted through the wet scrubber control system. During the inspection, heat process tanks and oil storage tanks appeared to meet this requirement.

SC III. 2. SC VI.3 **COMPLIANCE.** Scrubber shall be equipped with a system that automatically maintains a pH of 11 to 13 through the addition of sodium hydroxide. If the pH system malfunctions, sodium hydroxide shall be manually added. The facility provided scrubber operational logs for February 9, 2020 through March 7, 2020. Based on the records provided, the system is usually on "auto" mode and has maintained a pH between 11 and 13. The facility also provided scrubber operational logs for time periods where the system was in manual. For the records provided all manual additions the pH was between 11 and 13 with the exception of one shift on March 5, 2019 at 23:00 with a pH of 13.4. Subsequent pH measurements were within 11 to 13.

SC III.3. **COMPLIANCE.** Shall not accept waste oil for treatment from an off-site source. The WWTP does not accept waste oil from an offsite source.

SC IV. 1 and VI. 1. **COMPLIANCE.** Scrubber shall only process waste oil and is installed and operating properly. Shall conduct regular inspections to determine operational condition of the scrubber. Scrubber inspections shall be conducted during scheduled outages or downtimes, but not less frequently than once every six months. Inspections and preventative maintenance are regularly performed to maintain good operation. Daily scrubber inspection records for were provided February 9, 2020 through March 7, 2020 in addition to semi-annual records for 2018 and 2019. The facility appears to be meeting the requirements.

SC VIII. **COMPLIANCE.** The exhaust of the scrubber shall have a minimum height of 30 feet above ground. During the inspection the stack appeared to meet this requirement. Measurements were not collected.

#### **FGFACILITY**

SC I.1 and 2, SC VI. 2.d and e. **COMPLIANCE.** Emissions of each HAP less than 8.9 tons and aggregate HAPs less than 22.4 tons per year. Individual and aggregate HAP records to be maintained. Highest 12 month rolling aggregate HAP emissions from January 2018 through March 2020 occurred during October 2018 at 6.48 tons for both facilities combined. This indicates compliance with both aggregate and individual HAP limits. Records are maintained.

SC III. 1. **COMPLIANCE.** EU-BOILER#1, EU-BOILER#3, and EU-BOILER#4 shall permanently cease operation. Shall not operate, reconstruct, relocate, alter, or modify EU-BOILER#1, EU-BOILER#3, and EU-BOILER#4 without first obtaining a PTI. The facility has permanently discontinued the use the above listed boilers.

SC V.1. **COMPLIANCE.** Shall determine the HAP content of any material as applied and as received, using manufacturer's formulation data. Upon request of the AQD District Supervisor, shall verify the manufacturer's HAP formulation data using EPA Test Method 311. The facility maintains the HAP content from manufacturer's formulation data or SDS (AQD accepted). At this time the AQD has not requested EPA Test Method 311 analysis.

SC VI.1. **COMPLIANCE.** Shall keep all required calculations in a format acceptable to the AQD District Supervisor by the last day of the calendar month, for the previous calendar month, unless otherwise specified in special conditions. The facility appears to be meeting this requirement.

SC VI.2.a through c. **COMPLIANCE.** Shall keep the following on a monthly basis: gallons or pounds of each HAP containing material used; HAP content, in pounds per gallon, or pounds per pound, of each HAP containing material used; fuel usage for all fuel-burning equipment in FG-FACILITY and equipment-specific emission factors for each fuel. The records provided by the facility appear to satisfy these requirements.

#### **Cold Cleaners – R 336.1611 and R 336.1707**

The cold cleaners are not subject to 40 CFR Part 63, Subpart T as described under the NESHAP/MACT evaluations below.

The requirements of R 336.1611 and R 336.1707 are listed as generally as follows. Each cold cleaner must be equipped with a device for draining cleaned parts; be equipped with a cover and cover is closed when not in use; the cover mechanically assisted if the solvent's Reid vapor pressure exceeds 0.3 pounds per square inch absolute (psia) or the solvent is heated or the solvent is agitated; for new cold cleaners; special conditions that apply to Reid vapor pressure greater than 0.6 psia. Written operational procedures shall be posted in an accessible, conspicuous location near the cold cleaner.

According to records provided, the facility operates 10 solvent based cold cleaners that are not heated. The largest air/vapor interface area is 8.44 square feet. The records indicate that cold cleaners that are agitated are equipped with a mechanically assisted lid. According to the facility, parts are left in the tanks to drain.

The SDS for the Safety Kleen solvent indicates a vapor pressure of 0.2 mmHg (0.0039 psia) at 68 °F. The cold cleaners appear to meet the requirements of either R 336.1611 or R 336.1707.

#### **Paint Booth – R 336.1287(c)**

The facility paint booth is PTI exempt per R 336.1287(c).

R 336.1287(c): The requirement of R 336.1201(1) to obtain a permit to install does not apply to any of the following: A surface coating line if all of the following conditions are met: (i) The coating use rate is not more than 200 gallons, as applied, minus water, per month. (ii) Any exhaust system that serves only coating spray equipment is supplied with a dry filter control or water wash control which is installed, maintained, and operated in accordance with the manufacturer's specifications, or the owner or operator develops a plan which provides to the extent practicable for the maintenance and operation of the equipment in a manner consistent with good air pollution control practices for minimizing emissions. (iii) Monthly coating use records are maintained on file for the most recent 2-year period and are made available to the department upon request.

Records provided indicate that the paint booth is used on a limited basis. The highest paint usage from January 2018 through February 2020 occurred during October 2019 at 4.97 gallons. At the time of inspection filters were in place.

#### **Groundwater Remediation System, Soil Gas Mitigation System, and Loctite – R336.1290**

The facility now claims the groundwater remediation system, soil gas mitigation system, and Loctite operations as Rule 290 equipment.

As part of the Rule 290 submittal for the groundwater remediation system, Ford provided supporting documentation. According to the documentation, the system uses a stainless-steel air stripper. Vapor from the air stripper is routed to a catalytic oxidizer equipped with a catalyst selected for halogenated constituents. The oxidizer operates at 300 cubic feet per minute (cfm) at 950 °F (catalyst bed temperature) for destruction of chlorinated volatile organic compounds (CVOCs). The estimated destruction rate of CVOCs is 95%. According to the documentation, the inlet catalyst bed and outlet catalyst temperature is continuously monitored via temperature display, meeting the requirements of R336.1290(2)(b)(i)(A). This was not verified during the inspection. The facility tracks emissions from the groundwater remediation system on a monthly basis. Emissions are less than the 10 pounds per month threshold.

The facility provided Rule 290 records for the Loctite operations at the facility. VOC emissions are less than the 5 lbs per month with the highest occurring September 2019 at 3.5 lbs.

The facility also provided Rule 290 records for the soil gas mitigation system. Additional information regarding the soil vapor mitigation system was provided via email during January and February 2019 (see facility file). At that time, the supporting information was deemed appropriate to meet the requirements for a Rule 290 exemption. Soil gas is routed to a catalytic oxidizer. The oxidizer operates at a variable flow rate of 400 to 1,000 cfm at 800 to 900 °F (catalyst outlet temperature) for destruction of VOCs. The facility tracks emissions from the soil gas mitigation system on a monthly basis and were provided for August 2018 through January 2020. Emissions provided indicate compliance with Rule 290 thresholds with the highest monthly total VOC emissions at 47.242 lbs (September 2018).

#### **NEW SOURCE PERFORMANCE STANDARDS (NSPS)**

##### **40 CFR Part 60, Subpart Kb – Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984**

During the inspection, the facility provided an inventory of tanks (size, material, and location). Tanks at the facility do not appear to be subject to Subpart Kb either based on tank capacity or installation date. The largest tanks (20,000 gallons or 25,000 gallons) at the facility store automatic transmission fluid (ATF). During the 2016 inspection, Ms. Claudya Arana stated that the ATF tanks were constructed in 1970. Ford maintains original drawings of these tanks on file. Tanks at the ATF tank farm were installed prior to July 23, 1984 (§60.110b(a)) and are therefore not subject to Subpart Kb.

The remaining tanks at the facility are less than 75 cubic meters (19,812.9 gallons) and are used to store oil, gasoline, and other materials. These smaller tanks are not subject to Subpart Kb as their size is less than 75 cubic meters or 19,812.9 gallons, per §60.110b(a).

##### **40 CFR Part 60, Subpart IIII – Standards of Performance for Stationary Compression Ignition Internal Combustion Engines**

The diesel fired emergency generators for fire pumps #1 through #4 are not subject to Subpart IIII as they were installed (constructed) prior to July 11, 2005 (§60.4200(a)(2)). The latest installation date for the diesel fire pumps is 1995 (Fire Pump #4).

##### **40 CFR Part 60, Subpart JJJJ – Standards of Performance for Stationary Spark Ignition Internal Combustion Engines**

Natural gas fired emergency generators A, B, C, D, and E are not subject to Subpart JJJJ as they were installed (constructed) prior to June 12, 2006 (§60.4230(a)(4)).

According to facility records, emergency generator H and J are identical models, operate using natural gas, are rated at 194 HP, have a model year of May 20, 2014 with a purchase date of September 1, 2015. Both emergency generator H and J appear to be subject to Subpart JJJJ. During the previous inspection, emergency generators H and J were observed. The nitrogen pad generator observed during the inspection on March 9, 2020 is subject to Subpart JJJJ. The nitrogen pad generator has a model year of July 1, 2016, a purchase date of October 1, 2016, and is rated at 194 HP.

40 CFR 60.4233(e) and 40 CFR Part 60, Subpart JJJJ, Table 1 – **COMPLIANCE** - Emissions shall not exceed the following: NOx - 2.0 grams per horsepower-hour (g/HP-hr), CO - 4.0 g/HP-hr, VOC - 1.0 g/HP-hr. The facility provided exhaust

emission data that was provided by the manufacturer. Emission data indicates the following: NO<sub>x</sub> = 0.07 g/HP-hr, CO = 0.06 g/HP-hr, and VOCs = 0.294 g/HP-hr. The facility also provided pictures of the emission control information for both emergency engines H, J, and nitrogen pad generator.

40 CFR 60.4234 and 60.4243(a)(2)(ii) – **COMPLIANCE** – The facility appears to maintain engines and maintains appropriate records indicating as such.

40 CFR 60.4243(d) and 60.4243(e) – **COMPLIANCE** – emergency engine hour restrictions (please see the 40 CFR Part 60, Subpart JJJJ regarding language). The facility tracks engine hours as provided in "Livonia\_Complex\_Air\_Calcs.xls" tab "LTP Nat Gas Engines". Since January 2018 Generator H has operated 32.8 hours and Generator J has operated 26.5 hours. At the time of the inspection, the nitrogen pad generator had not operated (new install).

40 CFR 60.4237(b) – **COMPLIANCE** – Shall be equipped with a non-resettable hour meter. This was not verified during the inspection. However, records provided indicate the facility tracks hours of operation for each generator.

40 CFR 60.4243(a)(2)(ii) and 60.4245(a) – **COMPLIANCE** – Shall keep maintenance plan and records of maintenance conducted, emissions data, etc. The facility appears to be maintaining the required information.

#### **NESHAP/MACT**

##### **40 CFR Part 63, Subpart ZZZZ – National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines**

Equipment subject to this area source MACT were not evaluated during the inspection as the AQD has not accepted delegation for this area source standard.

##### **40 CFR Part 63, Subpart CCCCCC – National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Dispensing Facilities**

According to the facility the gasoline UST and gasoline dispensing operation have been removed from the facility. Therefore, area source MACT Subpart CCCCCC is no longer applicable.

##### **40 CFR Part 63, Subpart T – National Emission Standards for Halogenated Solvent Cleaning**

According to 40 CFR 63.460(a), this standard applies to units that use solvents with concentrations of 5% or more by weight of halogenated compounds. The SDS provided indicates that the solvent does not contain the halogenated compounds listed in Subpart T.

##### **40 CFR Part 63, Subpart XXXXXX – National Emission Standards for Hazardous Air Pollutants Area Source Standards for Nine Metal Fabrication and Finishing Source Categories**

The facility is not one of the "Nine Metal Fabrication and Finishing Sources Categories" identified in 40 CFR 63.11514 of Subpart XXXXXX as listed in Table 1 of the preamble (see Federal Register, Vol. 73, No. 142, July 23, 2008, p. 42979). The AQD has not accepted delegation for this area source standard.

##### **40 CFR Part 63, Subpart HHHHHH – National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources**

The paint booth at the facility does not appear to be subject to Subpart HHHHHH, as no paint stripping is performed using methylene chloride and no production coatings are spray-applied manually. The facility primarily uses aerosol spray cans which are excluded by definition per 40 CFR 63.1180. Additionally, spray coating application defined as facility maintenance painting is excluded per 40 CFR 11170(a)(2). The AQD has not accepted delegation for this area source standard.

#### **PTI EXEMPT EQUIPMENT**

##### **Transmission Manufacturing Equipment**

Transmission manufacturing equipment are exempt from PTI requirements per R336.1285(2)(l)(vi)(B) or (C). Emissions are either released to the general in-plant environment, or if released to outside ambient air are controlled by an appropriately designed fabric filter.

##### **WWTP Boiler**

The natural gas fired WWTP boiler (2,511,000 Btu/hour) appears to be exempt from PTI requirements per R336.1282(2)(b)(ii).

Bluing Stations

The bluing stations appear to be exempt from PTI requirements per R336.1283(2)(d).

Heat Treat/Carburizing Systems

The heat treat systems appear to be exempt from PTI requirements per R336.1282(2)(a)(i).

Aqueous Based Cold Cleaners

The aqueous based cold cleaners appear to be exempt from PTI requirements per R336.1281(2)(k).

Solvent Based Cold Cleaners

The solvent based cold cleaners appear to be exempt from PTI requirements per R336.1281(2)(h).

3-D Printer

The 3-D printer at the facility appears to be exempt from PTI requirements per R336.1286(2)(a). During the inspection the 3-D printer was not observed.

Isopropanol Cleaning

The use of isopropanol cleaning to clean off metal parts (sprayed on rag and then used to wipe part) appears to be PTI exempt per R336.1285(2)(r)(iv).

**APPLICABLE FUGITIVE DUST CONTROL PLAN CONDITIONS**

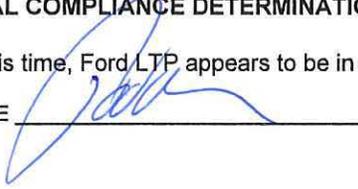
Not applicable. All lots are paved.

**MAERS REPORT REVIEW**

Reporting year 2019 MAERS was submitted in a timely manner and was reviewed by AQD staff. See facility file.

**FINAL COMPLIANCE DETERMINATION**

At this time, Ford LTP appears to be in compliance with applicable permit conditions as well as state and federal rules.

NAME  \_\_\_\_\_

DATE 9/10/2020 SUPERVISOR JK \_\_\_\_\_