

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION

FCE Summary Report

Facility : FORD MOTOR CO ROUGE COMPLEX	SRN : A8648
Location : 3001 MILLER RD	District : Detroit
	County : WAYNE
City : DEARBORN State: MI Zip Code : 48121	Compliance Status : Compliance
Source Class : MEGASITE	Staff : Robert Byrnes
FCE Begin Date : 09/28/2014	FCE Completion Date : 9/28/2017
Comments : 2017 FCE Report	

List of Partial Compliance Evaluations :

Activity Date	Activity Type	Compliance Status	Comments
09/19/2017	ROP Semi 1 Cert	Compliance	ROP Semi-Cert 1, 20 deviations reported. 2 of the deviations exceeded the 2 hour standard, however as previously discussed with Tamberlynn Shell at Ford I told them they would have leniency until the new consent order is entered into.
09/19/2017	CAM Excursions/Exceedances	Compliance	CAM Report, 16 Excursions reported.
09/19/2017	MACT (Part 63)	Compliance	Semi-Annual MACT Compliance report. No deviations reported. Compliance option 63.3091(b) was chosen, e-coat materials do not contain reportable HAP.
09/06/2017	Scheduled Inspection	Compliance	2017 Scheduled Inspection.
08/16/2017	Odor Evaluation		Odor evaluation in response to recent nearby odor complaint. The odor complaint was not directed at Ford but was for a garbage like odor. Because water wash systems at auto plants have the possibility of having those types of odors, this evaluation was conducted.
08/15/2017	ROP Other	Compliance	Semi-Annual VOC Report. Emissions of 4.4 lbs of VOC was below the limit of 4.8 for the months of April, May and June.
06/28/2017	Meeting Notes	Compliance	Telephone Notes regarding enforcement case and updating the O&M/MAP.

Activity Date	Activity Type	Compliance Status	Comments
06/21/2017	MACT (Part 63)	Compliance	Initial notification of applicability to Boiler MACT for a new natural gas fired process heater (EU-HeatTreat4).
06/21/2017	Other Non ROP	Compliance	Initial notification of commencement of operation as require by PTI 94-16.
06/02/2017	MAERS	Compliance	2016 MAERS certification, Sections 1 through 6.
06/02/2017	ROP Other	Compliance	2016 MAERS ROP Certification Form
06/01/2017	ROP Other	Compliance	2016 MAERS ROP Certification Form
06/01/2017	ROP Other	Compliance	2016 MAERS ROP Certification Form
06/01/2017	ROP Other	Compliance	2016 MAERS ROP Certification Form
06/01/2017	ROP Other	Compliance	2016 MAERS ROP Certification Form
05/05/2017	ROP Other	Compliance	1st Quarter 2017 VOC Report. Emissions reported as 4.4, 4.5 and 4.4 lbs VOC/job for January, February and March which is below the limit of 4.8 lbs VOC/job.
04/19/2017	Stack Test	Compliance	Re-Testing for Guidecoat Fluidized Bed combined with the RTO. Results were 86.4% combined RE & DE together (previously 78.9%). Re-test was conducted due to suspected issues with the carbon media which has been replaced.
04/19/2017	Stack Test	Compliance	Stack test results for Guidecoat Fluidized Bed combined with the RTO. Results were 95.8% DE, 78.9% RE. Re-test was conducted on April 12, 2017 due to suspected issues with the carbon media which has been replaced.
04/12/2017	Stack Test Observation	Compliance	Re-test of the Guidecoat Fluidized bed Removal Efficiency and RTO Destruction Efficiency.
04/12/2017	Scheduled Inspection	Compliance	FY 2017 Scheduled Inspection of Section 1, Paint Shop.
03/30/2017	ROP Other	Compliance	2016 MAERS ROP Certification Form
03/28/2017	ROP Annual Cert	Compliance	ROP Annual Cert, Section 4, no deviations reported.
03/28/2017	ROP SEMI 2 CERT	Compliance	ROP Semi-Cert 2, Section 4, no deviations reported.
03/28/2017	ROP SEMI 2 CERT	Compliance	ROP Semi-Cert 2, Section 2, no deviations reported.

Activity Date	Activity Type	Compliance Status	Comments
03/28/2017	ROP Annual Cert	Compliance	ROP Annual Cert, Section 2, no deviations reported.
03/28/2017	MACT (Part 63)	Compliance	MACT Subpart IIII Semi-Annual Report, compliance option 63.3091(b) was chosen as e-coat materials don't contain reportable HAP. system has not operated since 2011
03/28/2017	ROP Annual Cert	Compliance	2016 ROP Annual Cert, Section 5, No deviations reported.
03/28/2017	ROP SEMI 2 CERT	Compliance	2016 ROP Semi-Cert 2, Section 5, No deviations reported.
03/28/2017	CAM Excursions/Exceedances	Non Compliance	CAM Excursion/Exceedance Report, Section 1, 18 deviations. A VN was sent in August citing Rule 910 for control devices not being installed, maintained and operated in a satisfactory manner. The company also fails to adequately list how they minimized emissions due each malfunction.
03/28/2017	ROP SEMI 2 CERT	Compliance	ROP Semi-Cert 2, Section 3, no deviations reported.
03/28/2017	ROP SEMI 2 CERT	Compliance	ROP Semi-Cert 2, No deviations reported, Section 5.
03/28/2017	ROP Annual Cert	Compliance	ROP Annual Cert, Section 3, no deviations reported.
03/28/2017	ROP Annual Cert	Compliance	ROP Annual Cert, no deviations reported, Section 5.
03/28/2017	ROP SEMI 2 CERT	Non Compliance	ROP Semi-Cert 2, Section 1, 18 deviations. A VN was sent on October 14, 2016 citing Rule 910 for control devices not being installed, maintained and operated in a satisfactory manner. The company also fails to adequately list how they minimized emissions due each malfunction.
03/28/2017	ROP Annual Cert	Non Compliance	ROP Annual Cert, Section 1, no annual report was found. However, the deviations are a summary of the Semi-Cert 1 report (which was attached) and Semi-Cert 2 report which was required to be submitted. Non-Compliance due to the VN's sent on 3/31/16 and 10/14/16.
03/28/2017	MACT (Part 63)	Compliance	MACT Subpart IIII Semi-Annual Compliance Report, option 63.3091(b) was chosen as e-coat materials don't contain reportable HAP.

Activity Date	Activity Type	Compliance Status	Comments
02/02/2017	ROP Other	Compliance	4th Quarter VOC Report. 4.3, 4.3 and 4.4 pounds VOC/job for the months of October, November and December. Permit limit is 4.8 pounds VOC/job.
02/02/2017	MACT (Part 63)	Compliance	Notification of MACT DDDDD compliance and tune up compliance report. This report came from the CEDRI system used by EPA.
12/05/2016	ROP SEMI 2 CERT	Compliance	Revised ROP semi-cert 2 due to a bypass event that occurred on 9/8/2015. The discovery was made after reviewing Guidecoat RTO natural gas usage from previous bypass events.
11/01/2016	ROP Other	Compliance	3rd Quarter VOC Report. 4.3, 4.3 and 4.3 pounds VOC/job for the months of July, August and September. Permit limit is 4.8 pounds VOC/job.
09/22/2016	ROP Semi 1 Cert	Non Compliance	ROP Semi-Cert 1, Section 1. 9 deviations reported. This compliance report is marked as Non-Compliance as a VN notice was sent on 3/31/16 for the Guidecoat Deviations reported from 1/7/16 through 2/20/16.
09/22/2016	CAM Excursions/Exceedances	Compliance	CAM Excursion/Exceedance Report. 8 Excursions were reported.
09/22/2016	ROP Other	Compliance	2 Quarter VOC Report. 4.2, 4.3 and 4.2 lbs VOC/job reported for April, May and June respectively. This is below the permit limit of 4.8 lbs VOC/job.
09/21/2016	ROP Semi 1 Cert	Compliance	ROP Semi-Cert 3, no deviations reported. Section 4
09/21/2016	ROP Semi 1 Cert	Compliance	ROP Semi-Cert 1, no deviations reported. Section 2
09/21/2016	MACT (Part 63)	Compliance	MACT IIII Semi-Annual Report. Compliance option under 63.3091 (b) was chosen, e-coat materials do not contain reportable HAP. Section 2.
09/21/2016	ROP Semi 1 Cert	Compliance	ROP Semi-Cert 1, No deviations reported. Section 6
09/21/2016	Telephone Notes	Compliance	Telephone notes from phone conversation with Tamberlyn at 10:06 am.
09/16/2016	ROP Semi 1 Cert	Compliance	ROP Semi-Cert 1, Section 5, No deviations reported.
09/16/2016	ROP Semi 1 Cert	Compliance	ROP Semi-Cert 1, Section 3, No deviations reported.

Activity Date	Activity Type	Compliance Status	Comments
09/07/2016	Stack Test	Compliance	Stack test report for the clear coat capture efficiency testing conducted on June 26, 2016. Results were 40.4% for the clear coat booth, 31.6% for the clear coat oven.
08/31/2016	Scheduled Inspection	Compliance	2016 Scheduled Inspection, Section 1, Dearborn Paint and Assembly Plant.
07/11/2016	Stack Test	Compliance	Stack test results report from carbon wheel removal efficiency test conducted on April 14, 2016. The average removal efficiency over a 3 hour period was 98.8%.
06/07/2016	ROP Other	Compliance	Revised Monthly VOC emission reports. As Ford agreed with EPA, the plant-wide pound per job and 12 month rolling totals were determined using the January 2016 Clear Coat booth and Oven Capture Efficiency test values. The AQD does not agree with no emissions reported for the non-production month of September 2014 (previous clean up emissions were reported in other reports). EPA had previously cited the facility for emissions violations, the AQD cited as well but since EPA discovered the violation the AQD is relying upon EPA for settlement to the violations.
05/03/2016	ROP Other	Compliance	1st Quarter VOC Report. Emissions reported at 4.3 pounds VOC per job each month and mass emissions were 803, 812 and 821 tons per 12 month rolling time period for January, February and March respectively. Below the permit limits of 4.8 pounds VOC per job and 897 tons per 12 month rolling time period.
04/14/2016	Stack Test Observation	Compliance	Topcoat concentrator removal efficiency test observation.
04/07/2016	Stack Test	Compliance	Results submitted for the Clearcoat booth capture efficiency and oven capture credit. This testing was not reviewed or approved by the DEQ/AQD. The testing was in response to the violation notice sent by EPA for past discrepancies in the topcoat capture efficiency test results.
03/30/2016	ROP Other	Compliance	2015 MAERS ROP Certification Form

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03/30/2016	ROP Other	Compliance	2015 MAERS ROP Certification Form
03/30/2016	ROP Other	Compliance	2015 MAERS ROP Certification Form
03/30/2016	ROP Other	Compliance	2015 MAERS ROP Certification Form
03/30/2016	ROP Other	Compliance	2015 MAERS ROP Certification Form
03/30/2016	ROP Other	Compliance	2015 MAERS ROP Certification Form
03/30/2016	ROP Annual Cert	Non Compliance	ROP Annual Cert, 19 deviations reported. Section 1. VN notice sent for exceeding emission rates, however a previous VN was sent by EPA. AQD will consider this a final action and will rely on EPA for resolution to the emission limit violations. A second VN will also be sent for not properly operating their oxidizer under Rule 910. The Guide Coat oxidizer was operated in bypass mode for 803 minutes under 8 separate occasions for the same issue.
03/30/2016	ROP SEMI 2 CERT	Non Compliance	ROP Semi Cert 2, 8 deviations reported. Section 1. VN notice sent for exceeding emission rates, however a previous VN was sent by EPA. AQD will consider this a final action and will rely on EPA for resolution to the emission limit violations. A second VN will also be sent for not properly operating their oxidizer under Rule 910. The Guide Coat oxidizer was operated in bypass mode for 803 minutes under 8 separate occasions for the same issue.
03/28/2016	MAERS	Compliance	2015 MAERS Certification
03/28/2016	ROP SEMI 2 CERT	Compliance	ROP Semi-Cert 2, no deviations reported. Section 3.
03/28/2016	ROP Annual Cert	Compliance	ROP Annual Cert, no deviations reported. Section 3.
03/28/2016	ROP Annual Cert	Compliance	ROP Annual Cert, no deviations reported. Section 5.
03/28/2016	ROP SEMI 2 CERT	Compliance	ROP Semi Cert 2, no deviations reported. Section 5.
03/28/2016	ROP Annual Cert	Compliance	ROP Annual Cert, no deviations reported. Section 6.
03/28/2016	ROP SEMI 2 CERT	Compliance	ROP Semi-Cert 2, no deviations reported. Section 6.
03/28/2016	ROP Annual Cert	Compliance	ROP Annual Cert, no deviations reported. Section 4.

Activity Date	Activity Type	Compliance Status	Comments
03/28/2016	ROP Annual Cert	Compliance	ROP Annual Cert, 1 deviation reported. Section 2.
03/28/2016	ROP SEMI 2 CERT	Compliance	ROP Semi-Cert 2, no deviations reported. Section 2.
03/28/2016	ROP SEMI 2 CERT	Compliance	ROP Semi Cert 2, no deviations reported. Section 4.
03/28/2016	MACT (Part 63)	Compliance	MACT III Semi-Annual Compliance Report. Compliance option 63.3091(b) was chosen as e-coat materials do not contain any reportable HAP. The e-coat system at the Diversified Manufacturing plant has not been operational since 2011.
03/03/2016	MACT (Part 63)	Compliance	Boiler MACT DDDDD notification of compliance status 63.7545(e) (1&8), 63.9(h)(2). Reporting the facility completed the initial tune-up for all process heaters. This report also states the facility has had an energy assessment performed according to 63.7530 (e) (and Table 3). Dearborn Truck Plant - Section 1.
03/01/2016	MACT (Part 63)	Compliance	Boiler MACT DDDDD notification of compliance status 63.7545(e) (1&8), 63.9(h)(2). Reporting the facility completed the initial tune-up for all process heaters. Dearborn Diversified Manufacturing Plant - Section 2.
02/17/2016	ROP Other	Non Compliance	4th Quarter VOC Report. Included corrections for recent EPA Violation in which capture efficiency was erroneously used as 57% when it should have been 30%. With the revised emission calculations using 30% capture, ton per year limits were exceed for November and December 2015. Pounds VOC per job emission limits were exceeded for all of 2015. A violation notice will be sent after the March 15, 2016 ROP Certification as more dates over a period of years are likely to be included.
02/03/2016	Scheduled Inspection	Compliance	Scheduled Inspection at the Dearborn Engine Plant Section 3.
02/03/2016	Scheduled Inspection	Compliance	Scheduled Inspection at the Ford Dearborn Stamping Plant, Section 4.
11/18/2015	Other Non ROP	Compliance	Initial Notification for start up of EU-HEATREAT 3 as required by PTI 126-14A.

Activity Date	Activity Type	Compliance Status	Comments
11/18/2015	ROP Other	Compliance	3rd Quarter VOC Report. 4.8, 4.8 and 4.5 lbs VOC per job reported. At or below the permit limit of 4.8 lbs VOC per job.
11/18/2015	MACT (Part 63)	Compliance	MACT DDDDD initial notification of applicability for the start up of EU-HEATTREAT 3. Required within 15 days of start up, actual start up date was noted as October 1, 2015 in PTI 26-04a notification requirements received on November 5, 2015. A 26.8 MMBTU/hr natural gas fired aluminum heat treat furnace.
10/09/2015	ROP Tech Review Notes	Compliance	ROP Technical Review Notes.
09/24/2015	ROP Semi 1 Cert	Compliance	ROP Semi-Cert 1, 11 deviations reported. Section 1.
09/24/2015	MACT (Part 63)	Compliance	MACT IIII Semi-Annual Compliance Report, no deviations reported. compliance option 63.3091(b) was chosen, e-coat materials do not contain reportable HAP.
09/24/2015	ROP Semi 1 Cert	Compliance	ROP Semi-Cert 1, no deviations reported, Section 5.
09/24/2015	ROP Semi 1 Cert	Compliance	ROP Semi-Cert 1, No Deviations Reported, Section 4.
09/24/2015	ROP Semi 1 Cert	Compliance	ROP Semi-Cert 1, 1 Deviation Reported, Section 2.
09/24/2015	MACT (Part 63)	Compliance	MACT IIII Semi-Annual Compliance Cert, compliance option 63.3091(b) was chosen as E-coat materials do not contain reportable HAP. Process has been non-operation since 2011.
09/24/2015	ROP Semi 1 Cert	Compliance	ROP Semi-Cert 1, 1 Deviation Reported, Section 3.
09/24/2015	CAM Excursions/Exceedances	Compliance	CAM Report, 9 excursions reported. Section 1.
09/17/2015	Scheduled Inspection	Compliance	Scheduled Inspection, Section 2, Diversified Manufacturing Plant.
08/19/2015	Stack Test Observation	Pending	Primer Surfacer Capture Efficiency Retest
08/19/2015	ROP Other	Compliance	Quarterly VOC Report. 4.3, 4.4, and 4.5 lbs VOC/job for the months of April, May and June. Below the permit limit of 4.8 lbs VOC/job.
08/05/2015	Scheduled Inspection	Compliance	2015 Scheduled Inspection

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05/14/2015	ROP Other	Compliance	1st Quarter 2015 VOC report. 4.4, 4.4 and 4.5 lbs VOC/job for the months of January, February and March.
04/23/2015	ROP Other	Compliance	2014 MAERS Report/ROP Certification Form
04/23/2015	ROP Other	Compliance	2014 MAERS Report/ROP Certification Form
04/23/2015	ROP Other	Compliance	2014 MAERS Report/ROP Certification Form
04/23/2015	ROP Other	Compliance	2014 MAERS Report/ROP Certification Form
04/23/2015	ROP Other	Compliance	2014 MAERS Report/ROP Certification Form
04/23/2015	Stack Test	Compliance	Stack Test Results: Prime Booth CE 24.4%, Prime Oven CE 42.6% and Prime Transfer Efficiency 70.4%
03/18/2015	ROP Annual Cert	Compliance	ROP Annual Cert, no deviations reported, Section 5.
03/18/2015	ROP SEMI 2 CERT	Compliance	ROP Semi-Cert 2, no deviations reported, Section 5.
03/17/2015	ROP Annual Cert	Compliance	ROP Annual Cert, no deviations reported, Section 2.
03/17/2015	ROP SEMI 2 CERT	Compliance	ROP Semi-Cert 2, no deviations reported, Section 2.
03/17/2015	MACT (Part 63)	Compliance	report that the facility submitted the notification of compliance and unit Tune-Up Compliance report under 40 CFR 63.7545(e)(1&8) and 40 CFR 63.9(h)(2) under MACT DDDDD for Heat Treat Oven #1, Heat Treat Oven #2 and Chem Treat Dryer.
03/17/2015	ROP Annual Cert	Compliance	ROP Annual Cert, no deviations reported, Section 4.
03/17/2015	ROP SEMI 2 CERT	Compliance	ROP Semi-Cert 2, no deviations reported, Section 4.
03/17/2015	ROP SEMI 2 CERT	Compliance	ROP Annual Cert, 13 deviations reported however on deviation was listed as intermittent and occurred over a 3 month period. One deviation for a prime booth fire system interlock shut down the control device but not the spray booth which doesn't seem acceptable. Another deviation was for low carbon flow which shuts down the concentrator. Questions will be asked of Ford as to why this unit couldn't continue to operation. Section 1

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03/17/2015	ROP Annual Cert	Compliance	ROP Annual Cert, 13 deviations reported however on deviation was listed as intermittent and occurred over a 3 month period. One deviation for a prime booth fire system interlock shut down the control device but not the spray booth which doesn't seem acceptable. Another deviation was for low carbon flow which shuts down the concentrator. Questions will be asked of Ford as to why this unit couldn't continue to operation. Section 1
03/17/2015	MACT (Part 63)	Compliance	Auto MACT IIII Semi-Annual Compliance report. Compliance option 40 CFR 3091(b) was chosen using e-coat materials which do not contain reportable HAP. Section 1.
03/17/2015	MAERS	Compliance	MAERS Certification was included with Section 1 reports.
03/17/2015	MACT (Part 63)	Compliance	MACT IIII compliance report, option stated in 40 CFR 63.3091 (b) was selected for E-coat materials which do not contain reportable HAP. The e-coat system has been non-operational since 2011.
03/17/2015	ROP Annual Cert	Compliance	ROP Annual Cert, no deviations reported, Section 3.
03/17/2015	ROP SEMI 2 CERT	Compliance	ROP Semi-Cert 2, no deviations reported, Section 3.
02/27/2015	Stack Test Observation	Compliance	Panel testing for Capture Efficiency on the liquid spray Primer System.
02/24/2015	ROP Other	Compliance	4th Quarter VOC Report. 4.0, 4.2, and 4.3 lbs of VOC per job for the months of October, November and December. Permit limit is 4.8 lbs VOC/job.
12/04/2014	ROP Other	Compliance	3rd Quarter VOC Report.3.8, 3.7, and 3.9 lbs of VOC per job for the months of July, August and September. Permit limit is 4.8 lbs VOC/job.

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10/09/2014	ROP Semi 1 Cert	Compliance	ROP Semi-Cert 1. 5 deviations reported. 1 deviation was for not meeting average carbon rotor desorb temperature of 347 degrees Fahrenheit. This 3 hour average temperature was 333 degrees Fahrenheit. Any difference of 15 degrees or greater would have been required to be reported as an excursion as well.
10/09/2014	MACT (Part 63)	Compliance	MACT IIII Semi-Annual certification. Compliance option 63.3091(b) was chosen. E-coat materials do not contain reportable HAPs.

Name:  Date: 9/28/17 Supervisor: W.M.