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

A864825093

FACILITY: FORD MOTOR CO ROUGE COMPLEX		**SRN / ID:** A8648
LOCATION: 3001 MILLER RD, DEARBORN		**DISTRICT:** Detroit
CITY: DEARBORN		**COUNTY:** WAYNE
CONTACT: Jack Murray , Environmental Engineer - Site Services, Section 5		**ACTIVITY DATE:** 05/28/2014
STAFF: Robert Byrnes	**COMPLIANCE STATUS:** Pending	**SOURCE CLASS:** MEGASITE
SUBJECT: Scheduled inspection, section 5, Ford Dearborn Rouge Site Service.		
RESOLVED COMPLAINTS:		

On May 28, 2014 at 9:30 am I conducted a site inspection at the Ford Dearborn facility (SRN A8648). The purpose of this inspection was to verify compliance with the applicable requirements of MI-ROP-A8648-2010 for section 5. I met Jack Murray who escorted me into the facility where we met with Kim Cole of the Ford environmental corporate office.

The site visit began at the site services main office where discussed what I was looking for in terms of recordkeeping and what I wanted to observe during the site visit. This group is in charge of all maintenance for the Ford Dearborn Site and as an example includes all repairs to: guardrails, sidewalks, roads, mowing, trimming, signs, construction services, welding, torching, machining, substations, air compressors, painting. The group employees around 100 employees and sometimes bids on offsite projects at other Ford facilities as well.

The site services portion of the Ford Dearborn Rouge Complex is covered by Section 5 of the ROP and consists of two emission units: EU-Coldcleaners and EU-Fugitivedust.

EU-ColdCleaners
The facility has 3 cold cleaners which are operated as exempt. A list of the 3 cold cleaners was previously reviewed at the last inspection and no further review was conducted during this inspection. From the previous inspection report: Each unit uses cleaning solvent with < 0.1 reid vapor pressure and each have closing lids to be in compliance with Rule 707(3)(a)(i). Each has an air/vapor interface of less than 10 square feet. The cold cleaners are all operated as exempt under R281(h).

EU-Fugitivedust
The site services group is also responsible for compliance with the fugitive dust plan portion of the ROP. The dust plan is for paved roads and parking lots; bulk material storage sites; and sweeping debris.

Paved roads are required to be swept and/or flushed on either daily or alternate day schedules. A copy of the Daily fugitive dust control log from March 10, 2014 through May 16, 2014 was obtained and is attached to this report. The log shows the days when sweeping and/or flushing occurred unless rain occurred or the weather was too cold to flush. Occasionally the sweeper was in for repair but the record shows flushing still occurred. I briefly reviewed the daily route records for the flushing and street sweeping which seemed well in order and readily available. Example records of the daily records for March 31 and April 1, 2014 flushing and street sweeping are attached to this report. Also, on any of the past visits I have been on at the site, it is not uncommon to see the flusher, sweeper or notice that the roads have previously been wetted. 20 mph signs are posted on various roadways around the facility. Under EU-FUGITIVEDUST the facility is required to submit quarterly reports in which any requirement under the fugitive dust plan (Exibit A of SIP 13-1993 and Appendix 5-4) were not met.

Parking lots are cleaned on the weekends because it is harder to get into the lots during production days. The dust plan says parking areas are to receive wet sweeping treatment once per month. Non-traveled areas will be swept and cleaned a minimum of 3 times per year.
The bulk material storage sites and the sweeping debris piles are checked every day as part of the Daily Fugitive Dust Inspection Sheet (see attachment to this report). The inspection sheets confirms whether or not a wetting agent was necessary to control dust. The sheet also requires check off in case the daily mean temperature does not exceed 32 degrees Fahrenheit, if more than 0.1 inch of rain has occurred within the past 24 hours and whether or not the facility is manufacturing trucks.

The site services group is also responsible for the emergency generators at the facility. They have 8 emergency generators all <500 HP which are operated as exempt under Rule 285(g). The emergency generators are

required to have a non-resettable hour meter and keep track of hours per calendar year. We visited 2 of the fire pump and 1 emergency generator and viewed their hour meters. Jack Murray provided a copy of the annualized hours of operation for each engine (attached to this report). 40 CFR MACT ZZZZ requires the engines not be used more than 100 hours per calendar year for testing and maintenance purposes. The records show each engine to be under 35 hours for calendar year 2013. Emergency hours are unlimited, however none of the engines were ran for emergency purposes in 2013. 4 engines are existing CI <500 HP, 3 are existing SI <500 HP and 1 is a new CI < 500 HP. Also attached to this report is a description of each engine including the year purchased or reconstructed, model year, HP rating, manufacturer and ID or serial number. Finally a copy of the certificate of analysis is attached showing the sulfur content of the diesel fuel which was tested on February 28, 2014. The sulfur content was 5 ppm (.0005%) which is well below state rule R336.1402(4) Table 43 limit of 0.30 % by weight sulfur.

From the previous site inspection, the facility also operates the following equipment which appeared exempt based upon the MDEQ-AQD Part 2 exemptions:
The Main Site Services Shop consisted of the following equipment:
Woodworking equipment (band saw, table saws, planers, etc.) which were connected to a cyclone dust collector and vented outside exempt R285(l)(vi). Tin smith equipment for bending, shaping and rolling sheet metal exempt R285(l)(i). Pipe fitting equipment such as cutters and pipe threaders exempt R285(l)(vi). A tool crib area with various hand tools including electrical hand tools. An electrical crib area with various electrical supplies (wire, outlets, connectors, etc.). A mill right area with metal shears, a metal band saw, welders and torches exempt under R285(i) and R285(j). A painters area which included portable sprayers and equipment to paint parking lot lines exempt R287(j). Also this area contained one of the cold cleaners R281(h). A mechanic's area for equipment repair which included a hot power washer, a sandblast cabinet with cyclone control R285(l)(vi) and welding equipment exempt R285(l)(vi). Finally, one of the cold cleaners R281(h).

Sub Station 10 building which housed the power and utility workers. This facility contained: 3 large milling machines R285(l)(vi). One of the three listed cold cleaners, an arbor press, various torches R285(j) and several welding units R285(i).

Sub Station 15 building which housed the electrically powered air compressors that supply all the compressed air to the automobile body, paint and assembly plant.

Conclusion:
All data and information was obtained immediately at the conclusion of the inspection. All information was very clear to understand and verifiable. There are no outstanding items to be addressed at this time as section 5 of the facility appears to be in compliance with all applicable regulations based upon the information reviewed at this time.

We had a brief follow up discussion at the end of the site visit. Jack Murray provided all the records that were requested earlier in the day. No issues were outstanding and all areas of the inspection appeared to be incompliance with all applicable rules and regulations. I left the facility at 12:10 pm.

NAME Robert J Byrnes DATE 6/10/14 SUPERVISOR WM