



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
DETROIT



KEITH CREAGH
DIRECTOR

March 31, 2016

Mr. Bradford D. Huff, Plant Manager
Ford Motor Company - Dearborn Paint Shop & Assembly
3001 Miller Road
Dearborn, MI 48120

SRN: A8648, Wayne County

Dear Mr. Huff:

VIOLATION NOTICE

On March 30, 2016, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted a review of Semi-Annual and Annual ROP certifications for the Ford Dearborn Paint and Assembly plant located at 3001 Miller Road, Dearborn, Michigan. The purpose of this review was to determine 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-A8648-2015.

During the review, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
EU-Guidecoat	Rules 336.1702, 336.1910 and 40 CFR Part 64. Permit conditions EU-Guidecoat IV.1. and FG-controls IX.1	The same breakdown issue with oxidizer recurring 8 times in a 6 month period resulting in operation in bypass mode for over 800 minutes. Was the unit operating properly from 7/25/15 until the damper was discovered as operating open on 11/11/15?
FG-Controls	40 CFR Part 64.7(d), Permit condition FG-Controls VI.6.	The response to the excursions should prevent the likely recurrence of the cause of an excursion.

Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by April 21, 2016 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the oxidizer bypass/malfunction(s) occurred; an explanation of the causes and duration of the violation; whether the violation is ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the oxidizer malfunction(s) and the dates

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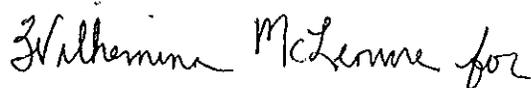
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by which these actions will take place; and what steps are being taken to prevent a reoccurrence. Also, please include the reasoning for why the unit was operating properly from July 25, 2015 through November 11, 2015 when the damper was discovered as being operated in the open position despite control room panel indications it was closed. If it is discovered the unit was not operating correctly please advise the DEQ of revised emission calculations and any additional exceedances that have occurred. Finally, please discuss what affect operating with the fresh air damper in open mode versus closed mode has on the effectiveness of the control device.

If Ford Motor Company 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 violation cited above and for the cooperation that was extended to me during inquiries. If you have any questions regarding the notice or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,



Robert Byrnes
Senior Environmental Engineer
Air Quality Division
517-284-6632

cc/via e-mail: Ms. Lynn Fiedler, DEQ
Ms. Teresa Seidel, DEQ
Ms. Heidi Hollenbach, DEQ
Mr. Thomas Hess, DEQ
Ms. Wilhemina McLemore, DEQ
Mr. Jeff Korniski, DEQ