



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
DETROIT



C. HEIDI GREETHER
DIRECTOR

October 14, 2016

Mr. Bradford D. Huff, Plant Manager
Ford Motor Company - Dearborn Assembly Plant
3001 Miller Road
Dearborn, MI 48126

SRN: A8648, Wayne County

Dear Mr. Huff:

VIOLATION NOTICE

On August 31, 2016, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of Ford Motor Company - Dearborn Assembly Plant located at 3001 Miller Road, Dearborn, Michigan. The purpose of this inspection 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 Air Pollution Control Rules; and the conditions of Renewable Operating Permit (ROP) number MI-ROP-A8648-2015;

During a review conducted as a follow up to the inspection and as a result of August 24, 2016 correspondence associated with a malfunction of the Topcoat Regenerative Thermal Oxidizer (RTO), staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
EU-TOPCOAT	Rule 336.1910 Special Condition , IV.1	The permittee operated the emission unit for approximately 58 hours without the required control device.
EU-GUIDECOAT FG-CONTROLS	Rule 336.1910, Special Condition IV.1	Failure to operate control equipment in a satisfactory manner due to low carbon flow faults on the Guidecoat fluidized bed.
EU-GUIDECOAT FG-CONTROLS	Rule 336.1910, Special Condition IV.1	Failure to operate control equipment in a satisfactory manner due to high oxygen faults on the Guidecoat fluidized bed.
FG-CONTROLS	Rule 336.1910, Special Condition IV.1 and Rule 336.1911, Special Condition	Variable Frequency Drive (VFD) failure on the Topcoat RTO. The permittee did not maintain spare

	III.1	VFD parts as required in the Operation and Maintenance (O&M) Plan.
FG-CONTROLS	Rule 336.1910, Special Condition IV.1	The July 2015 RTO inspection report noted the thermocouple was warped and should be replaced. January 2016 thermocouple failure resulting in 3 hours 53 minutes of RTO down time.
FG-CONTROLS	Rule 336.1910	The 2015 and 2016 inspection reports for both of the carbon concentrators mention seal gaps and that seals are either worn, torn, out of adjustment or should be replaced.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by November 4, 2016 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the violations occurred; an explanation of the causes and duration of the downtime(s); whether the violations are ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violations and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence. Also, as part of the written response please include an update on the plugging of ceramic blocks in the main RTO.

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.

Mr. Bradford D. Huff

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Thank you for your attention to resolving the violations cited above and for the cooperation that was extended to me during my inspection of August 31, 2016 and follow up responses for additional information that was requested. If you have any questions regarding the review conducted as a follow up to the inspection or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,

A handwritten signature in blue ink that reads "Wilhemina McLemore for". The signature is cursive and appears to be written on a white background.

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

cc/via e-mail: Ms. Lynn Fiedler, DEQ
Ms. Mary Ann Dolehanty, DEQ
Mr. Chris Ethridge, DEQ
Mr. Thomas Hess, DEQ
Ms. Wilhemina McLemore, DEQ
Mr. Jeff Korniski, DEQ