

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION

FCE Summary Report

Facility : FORD MOTOR CO/ WAYNE COMPLEX	SRN : A8650
Location : 37625 MICHIGAN AVE	District : Detroit
	County : WAYNE
City : WAYNE State: MI Zip Code : 48184	Compliance Status : Compliance
Source Class : MAJOR	Staff : Stephen Weis
FCE Begin Date : 8/10/2015	FCE Completion Date : 8/10/2016
Comments : FCE report for the Ford Motor Company Michigan Assembly Plant facility for FY2016.	

List of Partial Compliance Evaluations :

Activity Date	Activity Type	Compliance Status	Comments
08/10/2016	Scheduled Inspection	Compliance	Compliance inspection of the Ford Motor Company Wayne Assembly complex facility in Wayne. The Ford Wayne facility is scheduled for inspection in FY 2016.
05/31/2016	Other	Compliance	Review of RY2015 MAERS report.
05/11/2016	ROP Other	Compliance	The Annual ROP Certification Report for the Ford Wayne Complex - Michigan Assembly Plant included statements and information relating to the facility's compliance with 40 CFR Part 63, Subparts IIII and DDDDD.
05/11/2016	ROP Annual Cert	Compliance	The ROP Certification Report for the Ford Wayne Complex - Michigan Assembly Plant was submitted for the annual period that covers the 2015 calendar year. The report includes certification forms, and deviation reports and supporting information for both semi-annual periods of 2015.

Activity Date	Activity Type	Compliance Status	Comments
05/11/2016	ROP SEMI 2 CERT	Compliance	<p>The ROP Certification Report for the Ford Wayne Complex - Michigan Assembly Plant was submitted for the semi-annual period from July 1, 2015 through December 31, 2015. Twenty-three separate deviations were reported.</p> <p>All of the reported deviations relate to a VOC abatement system temperature falling below 1400 degrees. It should be noted that Ford identified the deviations as CAM excursions, as well. Fifteen of these are associated with the e-coat abatement, 6 with the enamel #1 line, and 2 with the enamel #2 line. Based on the information provided in the description field, the issues that caused these deviations appear to have been promptly addressed and corrected. 12 of the incidents lasted for less than 20 minutes. One of the deviations related to Enamel #1 was reported to have lasted for 30 hours. I was in contact with the facility regarding this incident, which occurred from November 23-24, 2015. Per my request, Ford submitted correspondence that stated how they operated during the control equipment downtime issue (focusing on how they minimized emissions), and included emission calculations to show that emissions during the control equipment downtime did not exceed applicable standards/permit limits. A copy of this correspondence is in the Ford Michigan facility file.</p> <p>Most of these deviations were reported to AQD-Detroit via a phone message from one of the facility's environmental contacts. The facility's ROP does not contain short-term emission limits; the VOC limits are in tons per year and pounds per unit, on a 12 month rolling time period basis. The quarterly emission submittals for the facility indicate compliance with these limits.</p>

Activity Date	Activity Type	Compliance Status	Comments
05/09/2016	ROP Other	Compliance	<p>Ford submitted the 1st Quarter 2016 monthly emissions report for the Michigan Assembly facility. This report is required per the requirements put forth in FG-Facility, Special Condition VII.4 of ROP MI-ROP-A8650-2010.</p> <p>The report is formatted such that data for each month in the quarter is provided, along with the 12 month rolling time period sum for certain measured parameters.</p> <p>The report also contains records for the PM-10 and VOC calculations for the Michigan Assembly Plant which indicate compliance with applicable limits. The PM-10 limit is 32.45 tons per year (based on a 12 month rolling time period), and the 12 month rolling totals for the 3 months in this quarter were 5.23, 5.09 and 4.82 tons. Similarly, for VOCs, there are limits (4.8 lbs. per job, 903 tons per year, both on a 12 month rolling total basis) and the report indicates compliance with the VOC limits (the lb. VOC per job totals were 2.42, 2.44, and 2.43 and the 12 month rolling totals were 316.71, 313.45 and 295.29 tons).</p>

Activity Date	Activity Type	Compliance Status	Comments
05/09/2016	ROP Other	Compliance	<p>Ford submitted the 1st Quarter 2016 Natural Gas Usage Report for the Wayne Assembly complex. The usage of natural and landfill gas in the facility powerhouse was reported, as well as natural gas usage associated with the vehicle assembly operations; this is required by Special Condition VI.1.g of FG-Facility in MI-ROP-A8650-2010.</p> <p>The Wayne Assembly portion of the facility is limited in terms of natural gas usage from the coating and assembly operations to 1,179,335,000 cubic feet per year based on a 12 month rolling time period (this is excluding gas usage associated with the powerhouse). Based on the reported monthly gas usage, the facility is in compliance with this limit for the three months of the 1st calendar quarter.</p>

Activity Date	Activity Type	Compliance Status	Comments
02/03/2016	ROP Other	Compliance	<p>Ford submitted the 4th Quarter 2015 monthly emissions report for the Michigan Assembly facility. This report is required per the requirements put forth in FG-Facility, Special Condition VII.4 of ROP MI-ROP-A8650-2010.</p> <p>The report is formatted such that data for each month in the quarter is provided, along with the 12 month rolling time period sum for certain measured parameters.</p> <p>The report also contains records for the PM-10 and VOC calculations for the Michigan Assembly Plant which indicate compliance with applicable limits. The PM-10 limit is 32.45 tons per year (based on a 12 month rolling time period), and the 12 month rolling totals for the 3 months in this quarter were 5.37, 5.31 and 5.24 tons. Similarly, for VOCs, there are limits (4.8 lbs. per job, 903 tons per year, both on a 12 month rolling total basis) and the report indicates compliance with the VOC limits (the lb. VOC per job totals were 2.48, 2.46, and 2.43 and the 12 month rolling totals were 324.72, 320.18 and 318.13 tons).</p>

Activity Date	Activity Type	Compliance Status	Comments
02/03/2016	ROP Other	Compliance	<p>Ford submitted the 4th Quarter 2015 Natural Gas Usage Report for the Wayne Assembly complex. The usage of natural and landfill gas in the facility powerhouse was reported, as well as natural gas usage associated with the vehicle assembly operations; this is required by Special Condition VI.1.g of FG-Facility in MI-ROP-A8650-2010.</p> <p>The Wayne Assembly portion of the facility is limited in terms of natural gas usage from the coating and assembly operations to 1,179,335,000 cubic feet per year based on a 12 month rolling time period (this is excluding gas usage associated with the powerhouse). Based on the reported monthly gas usage, the facility is in compliance with this limit for the three months of the 1st calendar quarter.</p>
11/18/2015	Complaint Investigation	Compliance	Odor complaint.

Activity Date	Activity Type	Compliance Status	Comments
10/28/2015	ROP Other	Compliance	<p>Ford submitted the 3rd Quarter 2015 monthly emissions report for the Michigan Assembly facility. This report is required per the requirements put forth in FG-Facility, Special Condition VII.4 of ROP MI-ROP-A8650-2010.</p> <p>The report is formatted such that data for each month in the quarter is provided, along with the 12 month rolling time period sum for certain measured parameters.</p> <p>The report also contains records for the PM-10 and VOC calculations for the Michigan Assembly Plant which indicate compliance with applicable limits. The PM-10 limit is 32.45 tons per year (based on a 12 month rolling time period), and the 12 month rolling totals for the 3 months in this quarter were 5.46, 5.56 and 5.48 tons. Similarly, for VOCs, there are limits (4.8 lbs. per job, 903 tons per year, both on a 12 month rolling total basis) and the report indicates compliance with the VOC limits (the lb. VOC per job totals were 2.48, 2.46, and 2.43 and the 12 month rolling totals were 323.09, 333.36 and 329.22 tons).</p>

Activity Date	Activity Type	Compliance Status	Comments
10/28/2015	ROP Other	Compliance	<p>Ford submitted the 3rd Quarter 2015 Natural Gas Usage Report for the Wayne Assembly complex. The usage of natural and landfill gas in the facility powerhouse was reported, as well as natural gas usage associated with the vehicle assembly operations; this is required by Special Condition VI.1.g of FG-Facility in MI-ROP-A8650-2010.</p> <p>The Wayne Assembly portion of the facility is limited in terms of natural gas usage from the coating and assembly operations to 1,179,335,000 cubic feet per year based on a 12 month rolling time period (this is excluding gas usage associated with the powerhouse). Based on the reported monthly gas usage, the facility is in compliance with this limit for the three months of the 1st calendar quarter.</p>
10/20/2015	MACT (Part 63)	Compliance	<p>The ROP Certification Report for the Ford Wayne Complex - Michigan Assembly Plant semi-annual period from January 1, 2015 through June 30, 2015 included a compliance statement regarding the facility's compliance with 40 CFR Part 63, Subpart IIII (the Auto MACT).</p>

Activity Date	Activity Type	Compliance Status	Comments
10/20/2015	ROP Semi 1 Cert	Compliance	<p>The ROP Certification Report for the Ford Wayne Complex - Michigan Assembly Plant was submitted for the semi-annual period from January 1, 2015 through June 30, 2015. Thirty-eight separate deviations were reported.</p> <p>All of the reported deviations relate to a VOC abatement system temperature falling below 1400 degrees. It should be noted that Ford is reporting these as CAM excursions. Fifteen of these are associated with the e-coat abatement, 10 with the enamel #1 line, 12 with the enamel #2 line, and one with the oven abatement system. Based on the information included in the description field, it appears that the issues that caused these deviations were promptly addressed and corrected. Several (12) of these incidents lasted over an hour; the longest incident involved the e-coat abatement equipment, and was reported to have lasted for 9 hours and 36 minutes. The description for this incident states that a replacement part had to be sent to the facility, and that no cleaning activity occurred while the abatement equipment was down to minimize emissions.</p> <p>Most of these deviations were reported to AQD-Detroit via a phone message from one of the facility's environmental contacts. The facility's ROP does not contain short-term emission limits; the VOC limits are in tons per year and pounds per unit, on a 12 month rolling time period basis. The quarterly emission submittals for the facility indicate compliance with these limits.</p>

Activity Date	Activity Type	Compliance Status	Comments
08/12/2015	ROP Other	Compliance	<p>Ford submitted the 2nd Quarter 2015 monthly emissions report for the Michigan Assembly facility. This report is required per the requirements put forth in FG-Facility, Special Condition VII.4 of ROP MI-ROP-A8650-2010.</p> <p>The report is formatted such that data for each month in the quarter is provided, along with the 12 month rolling time period sum for certain measured parameters.</p> <p>The report also contains records for the PM-10 and VOC calculations for the Michigan Assembly Plant which indicate compliance with applicable limits. The PM-10 limit is 32.45 tons per year (based on a 12 month rolling time period), and the 12 month rolling totals for the 3 months in this quarter were 5.47, 5.67 and 5.54 tons. Similarly, for VOCs, there are limits (4.8 lbs. per job, 903 tons per year, both on a 12 month rolling total basis) and the report indicates compliance with the VOC limits (the lb. VOC per job totals were 2.57, 2.55, and 2.48 and the 12 month rolling totals were 342.26, 355.46 and 336.17 tons).</p>

Activity Date	Activity Type	Compliance Status	Comments
08/12/2015	ROP Other	Compliance	<p>Ford submitted the 2nd Quarter 2015 Natural Gas Usage Report for the Wayne Assembly complex. The usage of natural and landfill gas in the facility powerhouse was reported, as well as natural gas usage associated with the vehicle assembly operations; this is required by Special Condition VI.1.g of FG-Facility in MI-ROP-A8650-2010.</p> <p>The Wayne Assembly portion of the facility is limited in terms of natural gas usage from the coating and assembly operations to 1,179,335,000 cubic feet per year based on a 12 month rolling time period (this is excluding gas usage associated with the powerhouse). Based on the reported monthly gas usage, the facility is in compliance with this limit for the three months of the 1st calendar quarter.</p>

Name: Steel Web Date: 9/30/16 Supervisor: JK