

DEPARTMENT OF ENVIRONMENTAL QUALITY  
AIR QUALITY DIVISION

FCE Summary Report

<b>Facility :</b> Ford Motor Company - Flat Rock Assembly	<b>SRN :</b> N0929
<b>Location :</b> 1 INTERNATIONAL DR	<b>District :</b> Detroit
	<b>County :</b> WAYNE
<b>City :</b> FLAT ROCK <b>State:</b> MI <b>Zip Code :</b> 48134	<b>Compliance Status :</b> Compliance
<b>Source Class :</b> MAJOR	<b>Staff :</b> Jonathan Lamb
<b>FCE Begin Date :</b> 7/18/2021	<b>FCE Completion Date :</b> 7/18/2022
<b>Comments :</b> FCE, FY 2022	

List of Partial Compliance Evaluations :

Activity Date	Activity Type	Compliance Status	Comments
07/18/2022	On-site Inspection	Compliance	On-site inspection, FY 2022
05/26/2022	Annual Emissions Report (or MAERS)	Compliance	MAERS certification form was received on 3/23/2022. Reviewed on 5/26/22.
05/26/2022	Other	Compliance	Review of 2021 MAERS
05/13/2022	ROP Qrtly Cert	Compliance	Emission/material usage report, 1st Quarter 2022, as required per ROP No. MI-ROP-N0929-2018, FG-FACILITY, VII.4. Note: During the reporting period, the facility was shut down the weeks of January 17, January 24, February 21, February 28, and March 7. Facility reports compliance with all requirements of the Auto MACT. Further review of emission and material usage data will be performed as part of the next FCE.  Note: all operations associated with the plastic molding and painting operations have permanently ceased, so no emissions from these operations are reported.
04/21/2022	Stack Test Observation	Compliance	RCO System DE/Outlet Concentration testing
04/20/2022	Stack Test Observation	Compliance	Outlet Concentration Monitoring (OCM) of the RCO System

Activity Date	Activity Type	Compliance Status	Comments
02/10/2022	Stack Test	Compliance	<p>Test report for RCO Outlet Concentration Monitoring (OCM) testing, received via email on December 23, 2021. Testing was performed on November 30, 2021, by Montrose Air Quality Services (David Trahan - Project Manager) and observed by Jon Lamb of AQD-Detroit District Office. Note: Testing is for monitoring/trending purposes only and is not considered to be a compliance test.</p> <p>Results show a destruction efficiency of 93.4% and an average VOC outlet concentration of 4.6 ppmvw for the RCO Control System, which would be in compliance with the VOC outlet concentration in MI-ROP-N0929-2011a, EU-Topcoat, IV.1, which requires the company to meet either an outlet concentration of 5 ppmv VOC or demonstrate 95% destruction efficiency for the RCO Control System. RCO A, B, and C were operated at higher temperatures during testing and should remain operated at temperatures at or above the temperatures recorded during testing to be considered to be operating in compliance. The setpoint of RCO A was increased from 1100 F in Run 1 to 1150 F for Runs 2 and 3; the setpoint of RCO B was increased from 1310 F for Runs 1 and 2 to 1350 F for Run 3. The following range of combustion temperatures were recorded during the testing: RCO A = 1103 F - 1152 F; RCO B = 1309 F - 1355 F; and RCO C = 1021 F - 1038 F.</p>

Activity Date	Activity Type	Compliance Status	Comments
02/10/2022	Stack Test	Non Compliance	<p>Test report for RCO Destruction Efficiency and Outlet Concentration received on February 7, 2022. Testing was performed on December 7, 2021, by Montrose Air Quality Services (David Trahan, Project Manager) and observed by Jon Lamb and Maureen Conner of AQD-Detroit District Office and Matt Karl of AQD-TPU. Results show a total destruction efficiency of 82.9% and an average VOC outlet concentration of 10.4 ppmvw for the RCO Control System, which is in noncompliance with both the destruction efficiency and VOC outlet concentration limits in MI-ROP-N0929-2018, EU-Topcoat, IV.1, which requires the company to meet either an outlet concentration of 5 ppmv VOC or demonstrate 95% destruction efficiency for the RCO Control System.</p> <p>RCO A, B, and C were operated at higher temperatures during testing and should remain operated at temperatures at or above the temperatures recorded during the most recent compliant test to be considered to be operating in compliance. The setpoints for each RCO were as follows: RCO A = 1150 F, RCO B = 1320 F, and RCO C = 1100 F. The following range of combustion temperatures were recorded by AQD staff during the testing: RCO A = 1146 F - 1151 F; RCO B = 1318 F - 1327 F; and RCO C = 1105 - 1116 F. The RTO, which feeds into RCO C, had a setpoint of 1460 F, and recorded temperatures ranged from 1456 F to 1476 F.</p> <p>As a result of the noncompliant test results, a Violation Notice was issued to the facility on February 18, 2022.</p>

Activity Date	Activity Type	Compliance Status	Comments
02/10/2022	MACT (Part 63)	Compliance	<p>Notification of Compliance and Unit Tune-Up Compliance Report for Units Subject to Major Source Boiler MACT (40 CFR 63 Subpart DDDDD) for the compliance period January 1 through December 31, 2021. Company certified compliance with the requirements of 40 CFR 63 Subpart DDDDD. Report included a list of all boilers/process heaters, including capacity and dates of tune-up/burner inspection of each unit. Units all burn natural gas and are in the MACT subcategory of "unit designed to burn gas 1 subcategory".</p>
02/01/2022	ROP Qrtly Cert	Compliance	<p>Emission/material usage report, 4th Quarter 2021, as required per ROP No. MI-ROP-N0929-2018, FG-FACILITY, VII.4. Note: During the reporting period, the facility was shut down from October 4 through October 17 and from December 27 through December 31. Facility reports compliance with all requirements of the Auto MACT. Further review of emission and material usage data will be performed as part of the next FCE.</p> <p>Note: all operations associated with the plastic molding and painting operations have permanently ceased, so no emissions from these operations are reported.</p>

Activity Date	Activity Type	Compliance Status	Comments
01/24/2022	ROP Qrtly Cert	Compliance	Emission/material usage report, 3rd Quarter 2021, as required per ROP No. MI-ROP-N0929-2018, FG-FACILITY, VII.4. Note: During the reporting period, the facility was shut down from July 12 through July 24, and from September 6 through September 18. Facility reports compliance with all requirements of the Auto MACT. Further review of emission and material usage data will be performed as part of the next FCE.  Note: all operations associated with the plastic molding and painting operations have permanently ceased, so no emissions from these operations are reported.
12/07/2021	Stack Test Observation	Compliance	RCO DE/Outlet Concentration testing
11/30/2021	Stack Test Observation	Compliance	OCM testing of the RCO System
11/03/2021	Release Reports	Unknown	PEAS No. 27500. Katie Ernst of Ford Flat Rock contacted PEAS to report a release of gasoline to storm drain and soil. Incident is being handled by EGLE-RRD and USEPA.
09/22/2021	On-site Inspection	Compliance	Scheduled inspection, FY 2021
07/29/2021	ROP Qrtly Cert	Compliance	Emission/material usage report, 2nd Quarter 2021, as required per ROP No. MI-ROP-N0929-2018, FG-FACILITY, VII.4. Note: Facility did not operate for a nine-week period from April 12 through June 14, 2021. Facility reports compliance with all requirements of the Auto MACT. Further review of emission and material usage data will be performed as part of the next FCE.  Note: all operations associated with the plastic molding and painting operations have permanently ceased, so no emissions from these operations are reported.

Name: 

Date: 6-4-24

Supervisor: 