



Ford Motor Company
Flat Rock Assembly Plant



1 International Drive
Flat Rock, MI 48134

February 18, 2016

Mr. Jonathan Lamb
Senior Environmental Quality Analyst, Air Quality Division
Michigan Department of Environmental Quality (MDEQ)
3058 West Grand Boulevard Suite 2-300
Detroit, Michigan 48202

Subject: Ford Motor Company Flat Rock Assembly Plant (FRAP) – MI-ROP-N0929-2011a
Response to Violation Notice Dated January 28, 2016

Dear Mr. Lamb:

This letter is in response to the Notice of Violation dated January 28, 2016 for allegedly violating rule/permit condition R 336.1901(b) of our permit ROP MI-ROP-N0929-2011a Section A-General Condition 12(b).

As communicated in our November 9, 2015 violation response letter, FRAP has undertaken a number of actions to identify and address odors and potential causes of odors in the community. While these actions have reduced the potential for odors in the community, FRAP continues to assess operations for opportunities to further reduce potential odor impacts. The table below includes the status of remaining items from the November 9, 2015 response letter and other additional actions initiated by FRAP.

Action	Comments	Status
Retain a third party environmental consultant to assist in identifying potential sources of "cat urine" type odors and develop a mitigation strategy if needed.	The SALI Group provided a summary report detailing the findings of their plant investigation to FRAP on September 28 th and FRAP immediately evaluated and acted upon the recommendations. The plastics tall stack and abandoned North line ductwork were identified as potential "cat urine" odor sources and the facility immediately acted upon the findings (i.e. removal of roof-level North plastics line ductwork, switching detackifier chemistry, additional testing/modeling of plastics tall stack and sludge pit/tunnel area).	Completed
Retain a third party environmental consultant to assess our impact on the community, identify potential sources of the "paint/solvent" odor, and guide us on additional actions should they be necessary.	FRAP retained Odor Science & Engineering (OS&E) to complete this study during the week of October 12, 2015. A final report was provided to Ford on December 16, 2015. The facility has been acting upon the recommendations in the report including conducting a follow-up odor survey.	Completed
Retain a third party environmental consultant to conduct VOC and NH3 emission testing on the plastic operation tall stack.	FRAP retained BTEC to perform this testing during the week of October 12, 2015. A final report was received on November 4, 2015. Findings confirmed that there are no ammonia emissions emanating from the tall stack.	Completed
Conduct "Free Residual Chlorine" evaluation of plastics pit water.	Chlorine dosing of the plastics sludge pit began October 8-2015. On November 28, 2015, an automated dosing system was implemented to maintain a free residual chlorine concentration.	Completed
Remove roof-level ductwork associated with decommissioned North plastics paint line.	Task completed on November 8, 2015.	Completed
Conduct plastics paint pit sulfate/sulfide/nutrient sampling.	Samples were collected on November 16, 2015. Analytical data was evaluated. Sulfate was found at a concentration of 30 ppm.	Completed
Evaluate materials in plastics painting operations that could potentially react with other chemicals to produce "cat urine" odor.	Air and sludge sampling conducted in plastics spray booth sludge pit and tunnel areas on November 16, 2015. Air sampling repeated on January 12, 2016. Data is currently being evaluated.	In Progress
Add non-oxidizing biocide to plastics paint pit.	The "cat urine" odor is believed to be a result of anaerobic biological activity associated with the sludge generated in the plastics sludge pit. Biocide was added on November 19, 2015.	Completed

Remove sludge material from plastics sludge pit and associated tunnel areas.	Most of the sludge in the plastics sluiceway tunnel and sludge pit have been removed as of 11/28. Five roll-off boxes of sludge material have been removed since November 11.	Completed
Retain third-party consultant to conduct odor surveillance.	Sali Group was hired to conduct plant and community odor surveillance starting November 24, 2015. Survey was completed twice per day for approximately seven weeks. Purpose of the survey was to document effectiveness of chlorine/biocide treatment with regard to "cat urine" odor.	Completed
Deep cleaning of plastics sludge pit.	A thorough cleaning/power washing of the plastics sludge pit took place during the December 2015 non-production time period.	Completed
Replace two existing plastics tall stack fans.	Task completed during the December 2015 non-production period.	Completed
Retain Odor Science & Engineering (OS&E) to conduct a follow-up community odor sampling event.	OS&E conducted a follow-up sampling event during the week of February 1, 2016 to re-evaluate the tall stack and community odor impact subsequent to odor reduction actions. Results from this survey in conjunction with the previous OS&E study were utilized to generate an air dispersion model to evaluate odor potential in the community.	Completed
Conduct outlet concentration monitoring on the Regenerative Catalytic Oxidizers (RCOs) control system to verify continued satisfactory operation.	RCO outlet concentration monitoring event is tentatively scheduled for the week of March 28, 2016.	In Progress

FRAP appreciates the opportunity to discuss the results from the February 2016 Odor Science & Engineering community odor evaluation, air dispersion modeling as well as the other actions listed above in more detail with you during our meeting that is scheduled for Thursday, March 3, 2016

If you have questions or require additional information, please contact Terry Filipiak at (734) 782-7797 or by email at tfilipia@ford.com.

Sincerely,


 Jeffrey Carrier
 Plant Manager

- cc: Ms. Lynn Fiedler, MDEQ
 Ms. Barb Rosenbaum, MDEQ
 Ms. Teresa Seidel, MDEQ
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 Ms. Wilhemina Mclemore, MDEQ
 Mr. Jeff Korniski, MDEQ
 Mr. Rodrick Gray, FRAP
 Ms. Danielle Fenbert, Ford EQO
 Mr. John Lauch, Ford EQO