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Air Quality Division Detroit Office

1 International Drive Flat Rock, MI 48134

Ford Motor Company Flat Rock Assembly Plant

July 14, 2017

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 June 27, 2017

Dear Mr. Lamb:

This letter is in response to the Notice of Violation dated June 27, 2017 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 you are aware, FRAP has undertaken a number of actions to identify and reduce odors and potential causes of odors in the community. While these actions have reduced the potential for odors in the community, FRAP continues to regularly monitor and assess our operations for opportunities to further reduce potential odor impacts. Each time a complaint is received; maintenance personnel inspect our operating processes and emissions equipment for any damage and verify that painting operations are within normal operating parameters. After FRAP became aware of the complaints on June 26, 2017, the equipment on the roof was inspected and all painting operations were thoroughly reviewed, however no issues or abnormal operating conditions were identified.

Production through the FRAP plastics paint shop began increasing in March 2017 to manufacture the required amount of spare and aftermarket parts inventory needed prior to the plastic paint shop closing in the 4th quarter of this year. However, actual production and related emissions remain well below permitted levels. Plastics paint is scheduled to run multiple production shifts during the week and on weekends until closure. Plant personnel will routinely inspect and monitor the plastics painting operations during this time period to ensure that no abnormal operations occur and that all emissions equipment is properly operating. FRAP anticipates that the potential for odor concerns will reduce significantly once the plastics paint shop is no longer in operation.

Ford appreciates the continued timely notifications of odor complaints that will better allow FRAP to evaluate potential odor concerns. Where practicable, an immediate notification would allow Ford personnel to verify potential odors attributed to our operations in the community and conduct a more timely/relevant review of our operations.

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

Ms. Lynn Fiedler, MDEQ cc:

Ms. Mary Ann Dolehanty, DEQ Mr. Christopher Ethridge, DEQ

Mr. Thomas Hess, MDEQ

Ms. Wilhemina Mclemore, MDEQ

Mr. Jeff Korniski, MDEQ

Ms. Lisa Hansen, Ford EQO

Ms. Ann McCormick, Ford EQO