



RICK SNYDER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
DETROIT FIELD OFFICE



DAN WYANT  
DIRECTOR

August 27, 2015

Mr. Timothy Young, Plant Manager  
Ford Motor Company - Flat Rock Assembly Plant  
1 International Drive  
Flat Rock, Michigan 48134-9401

SRN: N0929, Wayne County

Dear Mr. Young:

**VIOLATION NOTICE**

On August 24 and 25, 2015, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), investigated complaints regarding nuisance odors alleged to be the result of operations at Ford Motor Company – Flat Rock Assembly Plant, located at 1 International Drive, Flat Rock, Michigan. The purpose of this investigation was to determine Flat Rock Assembly Plant's 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 administrative rules; the conditions of Renewable Operating Permit (ROP) number MI-ROP-N0929-2011a; and to investigate complaints of nuisance odors received on August 24 and 25, 2015.

Mr. Jonathan Lamb of the AQD performed the investigation and observed the following air pollution violation:

Process Description	Rule/Permit Condition Violated	Comments
Automobile Coating Operations	R 336.1901(b); ROP No. MI-ROP-N0929-2011a, Section A – General Condition 12(b)	Strong paint/solvent and "cat urine" odors observed emitting from the facility and impacting nearby neighborhoods.

During the investigations performed on August 24 and 25, 2015, Mr. Lamb detected strong and consistent (Level 3 and 4) paint/solvent odors and odors similar to "cat urine" in residential areas downwind of Flat Rock Assembly Plant which were determined to be attributable to the facility's operations. Odors were not observed upwind of the facility.

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R 336.1901 states, in part:

"A person shall not cause or permit the emission of an air contaminant in quantities that cause injurious effects to human health and property, or the unreasonable interference with the comfortable enjoyment of life and property."

In my professional judgment, the odors observed were of sufficient intensity, frequency and duration so as to constitute a violation of R 336.1901(b) and Section A, General Condition 12(b) of ROP No. MI-ROP-N0929-2011a.

Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by September 17, 2015 (which coincides with 21 calendar days from the date of this letter). The written response should include: the date the violation occurred; an explanation of the causes and duration of the violation; whether the violation is ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violation and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

If Ford Motor Company – Flat Rock Assembly Plant 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.

Thank you for your attention to resolving the violation cited above. Should you require any further information, please contact me.

Sincerely,



Jonathan Lamb  
Senior Environmental Quality Analyst  
Air Quality Division  
313-456-4683

cc: Ms. Lynn Fiedler, DEQ  
Ms. Barb Rosenbaum, DEQ  
Ms. Teresa Seidel, DEQ  
Mr. Thomas Hess, DEQ  
Ms. Wilhemina McLemore, DEQ  
Mr. Jeff Korniski, DEQ