



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
DETROIT



C. HEIDI GREETHER
DIRECTOR

December 8, 2016

Mr. Jeffrey Carrier, Plant Manager
Ford Flat Rock Assembly Plant
1 International Drive
Flat Rock, MI 48134-9401

SRN: N0929, Wayne County

Dear Mr. Carrier:

VIOLATION NOTICE

On December 1, 2016, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), received the results of volatile organic compound (VOC) destruction efficiency testing of the regenerative catalytic oxidizer (RCO) system conducted on October 18, 2016, at Ford Flat Rock Assembly Plant, located at 1 International Drive, Flat Rock, Michigan. The purpose of this test was to determine Ford 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, and the conditions of Renewable Operating Permit (ROP) number MI-ROP-N0929-2011a.

Based on a review of the stack test results, staff observed the following violation:

Process Description	Rule/Permit Condition Violated	Comments
EU-Topcoat	ROP No. MI-ROP-N0929-2011a, EU-Topcoat, Special Condition IV.1 R 336.1910	Facility reported a destruction efficiency (DE) of 90% and VOC outlet concentration of 6 ppm, exceeding the permit limits of 95% DE or 5 ppm, as propane, outlet concentration.

The test results show that the RCO system failed to meet either the minimum VOC destruction efficiency of 95% or the maximum VOC outlet concentration of 5 ppm, as propane, as allowed per ROP No. MI-ROP-N0929-2011a, EU-Topcoat, Special Condition IV.1.

This also constitutes a violation of Act 451, Rule 910, which requires that an air-cleaning device shall be installed, maintained, and operated in a satisfactory manner and in accordance with the administrative rules and existing law.

Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by January 5, 2017 (which coincides with 28 calendar

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days from the date of this letter). The written response should include: the dates 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 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. Mary Ann Dolehanty, DEQ
Mr. Chris Ethridge, DEQ
Mr. Thomas Hess, DEQ
Ms. Wilhemina McLemore, DEQ
Mr. Jeff Korniski, DEQ