



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
DETROIT



C. HEIDI GREYHER
DIRECTOR

August 15, 2017

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

SRN: N0929, Wayne County

Dear Mr. Carrier:

VIOLATION NOTICE

On August 9, 2017, 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 9, 2017.

On August 9, 2017, Mr. Jonathan Lamb of the AQD performed an investigation from approximately 12:35 PM to 1:30 PM. During the investigation, the following air pollution violation was observed:

Process Description	Rule/Permit Condition Violated	Comments
Automobile Assembly Plant	R 336.1901(b); ROP No. MI-ROP-N0929-2011a, Section A – General Condition 12(b)	Strong (Level 3 and 4) paint/solvent, booth oven-type, and odors similar to cat urine observed emitting from the facility and impacting nearby neighborhoods.

During the investigation on August 9, 2017, strong and persistent paint/solvent odors, paint booth oven-type odors, and odors similar to cat urine were detected in residential areas downwind of Flat Rock Assembly Plant and were determined to be attributable to the facility's operations. Odors were not observed upwind of the facility.

R 336.1901(b) states, in part:

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"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 AQD staff's professional judgment, the odors observed were of sufficient intensity and duration 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 5, 2017 (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 via email: 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