Ford Motor Company Rouge Center Fugitive Dust Control Plan

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FACILITY NAME AND ADDRESS

Ford Motor Company Rouge Center 3001 Miller Road Dearborn, MI 48121

RESPONSIBLE PERSON AND DESIGNATED ENVIRONMENTAL REPRESENTATIVE

Responsible Person

Manager, Manufacturing Planning Ford Motor Company Rouge Center Site Services (FRCSS) 3001 Miller Road Dearborn, MI 48121 Phone: (313) 323-6397

Designated Environmental Representative

Designated Environmental Representative (DER) Ford Motor Company Rouge Center Site Services (FRCSS) 3001 Miller Road Dearborn, MI 48121 Phone: (313) 337-3511

ROUGE CENTER DESCRIPTION

The Ford Motor Company Rouge Center is located in Wayne County in the City of Dearborn at 3001 Miller Road, Dearborn, Michigan 48121. The Rouge Center is bounded to the West by Schaefer Road to the West, I-94 and Rotunda Drive to the North, Miller road to the East and the Rouge River to the South. The facility's Michigan Department of Environmental Quality, Air Quality Management Division Establishment Number is A8648, Federal Employer Identification Number (FEIN) is 38-0549190 and North American Industry Classification Code(s) are 336399, 336370, and 336112.

ROUGE CENTER DIAGRAM

The facility diagram, located in Appendix A, identifies the location of active parking lots and paved roads around the facility. There are no unpaved roadways or parking lots in the Rouge Center. Publically accessible parking lots and roadways, such as the Henry Ford Visitor Center, are not included in the Fugitive Dust Plan as these areas are not used by any manufacturing operation, are open to the public and are operated/managed by outside entities. The Rouge Center Diagram may be updated periodically to reflect topographical/facility changes that have the potential to impact and/or control fugitive dust formation (i.e., identification of new parking lots, roadways, etc.). Updates to the diagram in Appendix A are not subject to Michigan Department of Environmental Quality and U.S. EPA approval.

ROUGE CENTER POTENTIAL FUGITIVE DUST SOURCES

Paved Roads and Parking Lots

| Source Description: | The Rouge Center has several access paved roads and parking lots. All parking lots, access roads and truck trailer routes are paved. Truck trailer routes lead from the facility entrances to various loading and off-loading areas surrounding the perimeter of each facility in the Rouge Center. | |
|-------------------------------|--|--|
| Best Management Practices: | Speeds are limited to 20 mph in parking lots and 20 mph on access and truck trailer routes. Speed limits signs are posted along the roadways. Each truck trailer driver is provided orientation training that includes instructions restricting truck traffic to paved road surfaces, speed limitations and other facility requirements. | |
| | Fugitive dust control treatment procedures for paved roads/parking lots are primarily devoted to wet sweeping and flushing practices. All paved roadways in the Rouge Center are identified in the Facility Diagram in Appendix A. | |
| | All paved roadways are swept and/or flushed on either daily or alternate day rotational schedules, five days a week for eight months of the year. Daily treatments are applied to roadways having heavy dust loading potential based on roadway location, traffic volumes, and vehicle tonnages. Alternative day treatments are applied to those roadways with light or medium dust loading potential. | |
| | Treatment procedures are forgone when: | |
| | Daily precipitation exceeds 0.1 inches. Road salt is applied and for 48 hours thereafter. Daily mean temperature does not exceed 32°F during normal business hours. No manufacturing operations are performed in Ford owned facilities. | |
| | The traveled portions of parking areas receive wet sweeping treatment once per month. A greater frequency rate will be implemented, if warranted, during extended dry weather periods. The non-traveled portion of parking lots will be swept and cleaned a minimum of three times per year. | |
| Record-keeping: | Records of the fugitive dust control efforts for paved roadways and parking lots must include: 1) date of treatment, 2) control measure used, 3) responsible person's initials and 4) road segment/lot identification. | |

Bulk Material Storage Sites

| Source Description: | Various bulk materials (e.g., concrete, gravel, etc.) used in various operations are occasionally stockpiled in small bulk quantities for reuse or off-site disposal. Stockpile sizes are generally less than 100 cubic yards. | | |
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| Best Management Practices: | Bulk Material Storage Sites are monitored daily five days a week for eight | | |
| | Daily Bulk Material Storage Site inspections are forgone when: | | |
| | Daily precipitation exceeds 0.1 inches. Daily mean temperature does not exceed 32°F during normal business hours. | | |
| | No manufacturing operations are performed in Ford owned facilities. | | |
| Record-keeping: | Records of the fugitive dust control efforts for bulk material storage sites must include: 1) date of treatment, 2) control measure used, 3) responsible person's initials, 4) dilution ratio (if applied), 5) amount of dust suppressant/water applied, 6) identification of file/material handling operating treated and 7) equipment used. | | |

Sweeping Debris

| Source Description: | Waste materials generated during roadway and parking lot sweeping activities are deposited in an interim holding site. The deposited volume at any one time is less than 100 cubic yards. |
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| Best Management Practices: | Sweeping Debris deposits are monitored daily five days a week for eight months of the year. or more frequently, as needed. Appropriate control measures (i.e., dust suppressant/water application) are implemented, wher needed, to reduce fugitive dust emission potential. Observations and control measures are documented on the Daily Fugitive Dust Inspection Sheet in Appendix C. |
| | Daily inspections of sweeping debris deposits are forgone when: |
| | Daily precipitation exceeds 0.1 inches. Daily mean temperature does not exceed 32°F during normal business hours. No manufacturing operations are performed in Ford owned facilities. |

| suppressant/water applied, 6) identification of file/material handling operating treated and 7) equipment used. | | |
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REPORTING

The Responsible Official must submit a report of certifying compliance to the monitoring, control measures and recordkeeping requirements contained in the Fugitive Dust Control Plan except for reported deviations as part of the semiannual and annual Renewal Operating Permit compliance certifications.

Reported deviations must identify each day in which any emission limit, operational requirement, or recordkeeping requirement, as specified in Fugitive Dust Control Plan that was not met, including an explanation of the reason that the requirement and/or recordkeeping requirement was not met, the duration of the event, the remedial action taken, and a description of the steps which were taken to prevent a recurrence. Report must be submitted and received by appropriate MDEQ AQD district office and US EPA by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30.

FUGITIVE DUST CONTROL PLAN ADJUSTMENT(S)/AMENDMENT(S)

This Fugitive Dust Plan is subject to adjustment when warranted. Should any internal or external events (e.g., MDEQ inspection) indicate change is needed to better manage the paved roads and parking lots, adjustment to this plan will be made, documented and submitted to the MDEQ Air Quality Division District Supervisor for approval.

| Date | Description of Change | Approver Name/Signature |
|------|-----------------------|-------------------------|
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APPENDIX A: ROUGE CENTER DIAGRAM

APPENDIX B: DAILY FUGITIVE DUST CONTROL LOG

APPENDIX C: DAILY FUGITIVE DUST INSPECTION SHEET



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