DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: Scheduled Inspection

A864831336

FACILITY: FORD MOTOR CO ROUGE COMPLEX		**SRN / ID:** A8648
LOCATION: 3001 MILLER RD, DEARBORN		**DISTRICT:** Detroit
CITY: DEARBORN		**COUNTY:** WAYNE
CONTACT: Mark Gornick , Environmental Engineer Dearborn Diversified Mfg.		**ACTIVITY DATE:** 09/17/2015
STAFF: Robert Byrnes	**COMPLIANCE STATUS:** Compliance	**SOURCE CLASS:** MEGASITE
SUBJECT: Scheduled Inspection, Section 2, Diversified Manufacturing Plant.		
RESOLVED COMPLAINTS:		

On September 17, 2015 at 9:30 am I conducted a site inspection at the Ford Dearborn facility (SRN A8648). The purpose of this inspection was to verify compliance with the applicable requirements of MI-ROP-A8648-2010 for section 2. I met with Tamberlyn Shell of the Ford environmental corporate office. She took me to the Diversified Manufacturing where we met with Mark Gornick, Diversified Manufacturing Plant Environmental Engineer. Mark provided a complete tour of the facility and all the operations there. The Dearborn Diversified Manufacturing facility is a separate factory within the Rouge Complex and is covered by Section 2 of the Ford Dearborn Assembly ROP.

HISTORY:
This manufacturing plant used to produce frames for the Grand Marquis and Crown Victoria vehicles. Stamping presses, welding equipment and the aqueous washers have mostly been removed or disabled at the facility. The phosphate tanks and e-coat dip tanks/oven (EU-ECOATFRAME) has been drained of all chemicals. The process equipment remains on site but has not been used since August 31, 2011. Eventually the e-coat line might be cleaned again and the equipment will be stripped out and sent for recycling.

TODAY:
This facility is currently producing several aluminum sub-assemblies for the new F-150. They currently have several different lines which bend aluminum, 4 hydro-form presses, and several laser cut operations to make the aluminum parts (exempt Rule 285(l)(i) and 285(l)(vi). All processes vent internally and only the laser cutters had a particulate control device which again vented internally. After the parts had been made they then proceeded to the chemical-treat dryer (soapy water parts washer) and then on to one of two aluminum heat treat ovens in operation (EU-HEATTREAT 1 & 2). Heat treat oven 3 (EU-HEATTREAT3) was observed as under construction.

Copies of the Initial Tune-up require by Boiler MACT was obtained. The reports show they meet the obligations as required by 40 CFR 63.7540(a)(10)(i) through (a)(10)(vi). Copies of the tune up reported are included as Attachment "A" with this report.

There is one FG-Rule290 source which is for sealer application between various aluminum body parts between the seams. A copy of the usage records, MSDS sheet and emission records as included as Attachment "B" with this report. The calculations show no more than 3.1 pounds per month, way below the Rule 290 threshold of 1,000 pounds per month.

There is one FG-Rule287(c) source at the facility which is for the various ink marking machines. The machines make part numbers, date of mfg., or other similar markings with an ink jet which is put on the part. The facility assumes worst case peak volumes, and VOC contents and use about 2 gallons per week. Well below the 200 gallon per month exemption requirements for Rule 287(c). A copy of the assumptions and calculations are included as attachment "C" with this report.
The facility continues to operate several sub assembly lines to build part assemblies for the F-150 truck. These lines are operated as exempt and include: Tire and Wheel assembly, Fox shock, and coil over shock assembly line, disc brake assembly line and the rear axle assembly line which includes brakes, axle and leaf springs. The only potential air emission would be from tire assembly lubricant. Previous review of the MSDS for this material shows no VOC materials and further viewing of product environmental sheets also showed this material was 98% water and no known VOC or HAP listed as ingredients.

The facility currently has 3 cold cleaners of which 2 are solvent cleaners and one is aqueous based. I requested and obtained a copy of the Rule 281(h) cold cleaners that were on site at the facility. The document contained information to determine compliance with Rule 707 showing the Reid vapor pressure below 0.6 psia and stating there is a device to drain the cleaned parts. Copies of the cold cleaner information is included as attachment "D" to this report.

The facility also recently installed a new emergency generator. The production date for the engine is 10/16/2013 and it is a 5.4 Liter, 82 HP natural gas fired engine capable of generating 45 kw. It is used for emergency lighting for the diversified manufacturing building. A copy of the hours of operation record was obtained. Since installation on May 21, 2015 the engine has operated a total of 18.2 hours through August 27, 2015 for commissioning and weekly checks. Engine installations of this type are commonly operated as exempt under Rule 285(g). See attachment " E" included with this report for more information.

At the time of the inspection and writing of this report there are no known compliance issues for the diversified manufacturing plant.

NAME Robert Byers DATE 9/22/15 SUPERVISOR W. M.