

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

A864850475

FACILITY: FORD MOTOR CO ROUGE COMPLEX		SRN / ID: A8648
LOCATION: 3001 MILLER RD, DEARBORN		DISTRICT: Detroit
CITY: DEARBORN		COUNTY: WAYNE
CONTACT: Kimberly Cole , Environmental Engineer - Rouge Complex		ACTIVITY DATE: 09/12/2019
STAFF: Robert Byrnes	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MEGASITE
SUBJECT: FY 2019 Scheduled Inspection - Tool & Die Plant, Section 6		
RESOLVED COMPLAINTS:		

On September 12, 2019 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-A8648-2015a for Section 6 (Tool and Die).

### Section 6 – Tool & Die:

I met with Kim Cole who escorted me to the facility where we met with Bruce the environmental representative. The facility operates 20 hours per day Monday through Friday and 24 hours per day on Saturday and Sunday. The facilities makes stamping dies for Ford Motor Company. Heat for the building is provided by steam from Dearborn Industrial Generation (DIG). Compressed air comes from onsite compressors via the large blue piping found in the utilities structures lines throughout the facility.

There are 2 electric heat treat furnaces for carbonization of metal dies (hardening). Natural gas is introduced into the furnace for the carbonization process and not for heat. Not much information was provided during the inspection and it was suggested that an exemption rule be cited in documentation along with a Rule 278 demonstration be kept on file. It is possible the unit could be exempt under Rule 282(2)(a)(i) but I did not have a good understanding of how the process worked or the emission characteristics.

The facility has 6 cold cleaners throughout the facility. Records of the parts cleaners were obtained, all of which are operated as exempt under Rule 281(h). The records show the following in accordance special conditions VI.1 & 2.

- Serial number/identifier
- Installation date
- Air/vapor interface area < 10sft
- Reid vapor pressure <= 0.13 psia@100 deg F.

Based upon the records review these cold cleaners as operated comply with the permit conditions found under Section 6, FG-COLDCLEANERS-S6.

Other process equipment in Section 6 includes 13 try out presses which are used to test and verify the dies before they are shipped to the various Ford plants. 2 of the largest presses are 3500 tons each. There are also 5 presses used for die construction and 2 older presses which are no longer in use at this time. The machining and press operations are likely exempt under Rule 285(2)(l)(i) and Rule 285(2)(l)(vi). The facility also includes various sizes of milling machines used for manufacturing of the dies. Most of the machining is done dry on the larger machines, H2O based coolant (comes in 55 gallon drums) and 1 oil based coolant (totes or 55 gallon drums) is used on the smaller milling machines.

The facility also operates 7 Rule 290 sources (company stated 6, but I have records for 7) for various operations such as Dykem Layout red, Dykem layout blue, blue ink, beechem layout, blue layout finish, ethanol and bonderite wipes. It would seem the layout materials would be all one emission unit, but either way emissions from all R290 layout sources amount to 10 pounds per month while R290 allows up to 1000 pounds per month. Ethanol was 731.1 pounds per month (I'm not sure how it can be exactly the same each month) and Bonderite was exactly 4.2 pounds VOC per month. The data I obtained was emission summary information but usages were exactly the same each month. Special Condition VI.1(e) found on page 249/264 of FG-RULE 290-

S6 requires material use and calculations to identify the actual emissions of the emission unit (not just the summary). Perhaps there was more data at the facility or Ford will correct this for future inspections.

**Conclusion:**

All records requested were obtained during the initial meeting at the beginning of the inspection. All information was very clear to understand and verifiable. There are currently no outstanding items to be addressed at this time as section 6 of the facility appears to be in compliance with all applicable regulations based upon the information reviewed at this time.

NAME *Andrew Byrnes* DATE *9/20/19* SUPERVISOR *W.M.*