

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: On-site Inspection

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| 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: 03/02/2022 |
| STAFF: Robert Byrnes | COMPLIANCE STATUS: Unknown | SOURCE CLASS: MEGASITE |
| SUBJECT: FY schedule inspection, Sections 5 & 6. | | |
| RESOLVED COMPLAINTS: | | |

On March 2, 2022 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 5 (Site Services) and Section 6 (Tool and Die).

Section 6 – Tool & Die:

I met with Kim Cole who escorted me to the facility where we met with Dennis Lloyd the environmental representative. 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 installed in 1986 for carbonization of metal dies (hardening). Natural gas is introduced into the furnace for the carbonization process and not for heat. These units I was told by Kim C are exempt under Rule 282 (2)(a)(i) and that they pre-date Rule 278 by installation date.

The facility has 7 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 <= 0.1 psia

Based upon the records review these cold cleaners as operated comply with the permit conditions found under Section 6, FG-COLDCLEANERS-S6. This determination was completed by the additional information provided on April 27, 2022 email from Kim Cole.

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 3 Rule 290 sources for various operations such as Marking Inks Ethanol and highlight wipes. R290 allows up to 1000 pounds per month of emissions. Emissions from Ethanol Wipes were as high as 723.5 lbs during June 2021 (I'm not sure how it can be exactly the same each month, perhaps there was more data at the facility or Ford will correct this for future inspections). R290 Highlight wipes were up to 19.5 pounds for the

month of December 2021. R290 Sealer was at 0.4 pounds for October 2021.

The facility has One Rule 287c exempt source which allows up to 200 gallons per month of coatings. Marking inks are covered under this exemption and for the Month of July 2021 the total usage was 0.2 gallons.

The facility also has a welding area where the various welding tables are exhausted outside. The used of the R285 exemptions was confirmed by the Kim Cole April 27, 2022 email and stated the welding exhaust currently has a filter on the roof exhaust.

Conclusion:

Records were requested the initial meeting at the beginning of the inspection. A follow up email was sent on April 15 requesting R287 and R290 records that were requested from the initial meeting. Also, follow up information was requested for Cold Cleaners as it was not clear how compliance with R706 was achieved and the sft surface area values did not meet the dimensions listed (the math was incorrect). Additional information was received via email from Kim Cole on April 27, 2022. The information received was verified. 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.

Section 5 – Site services:

On March 2, 2022 I conducted a site inspection at the Ford Dearborn facility (SRN A8648) Site Services Section 5. The purpose of this inspection was to verify compliance with the applicable requirements of MI-ROP-A8648-2015a for section 5. Kim Cole and I met with Monica

And the site visit began at a site services office where discussed what I was looking for in terms of recordkeeping and what I wanted to observe during the site visit. This group is in charge of all maintenance for the Ford Dearborn Site and as an example includes all repairs to: guardrails, sidewalks, roads, mowing, trimming, signs, construction services, welding, torching, machining, substations, air compressors, painting. The group employees around 100 employees and sometimes bids on offsite projects at other Ford facilities as well.

EU-Fugitivedust

The site services group is also responsible for compliance with the fugitive dust plan portion of the ROP. The dust plan is for paved roads and parking lots; bulk material storage sites; and sweeping debris.

Paved roads are required to be swept and/or flushed on either daily or alternate day schedules. A copy of the Daily fugitive dust control log from March 15, 2021 through

May 27, 2021 was obtained and is attached to this report. The log shows the days when sweeping and/or flushing occurred unless it has rained or the weather was too cold to flush. Occasionally the flusher was down but the record shows sweeping still occurred. I briefly reviewed the daily route records for the flushing and street sweeping which seemed well in order and readily available. Copies of the flusher treatment sheets for March 31, 2021 and April 1, 2021 were obtained and reviewed. Copies of the sweeper treatment sheets for May 10, 2021 and May 11, 2021 were obtained and reviewed. Also, on most visits it is not uncommon to see the flusher, sweeper or notice that the roads have previously been wetted. 20 mph signs are posted on various roadways around the facility. Under EU-FUGITIVEDUST the facility is required to submit semi-annual reports in which any requirement under the fugitive dust plan were not met (Exhibit A of SIP 13-1993 and Appendix 5-4).

Parking lots are cleaned on the weekends because it is harder to get into the lots during production days. The dust plan says parking areas are to receive wet sweeping treatment once per month. Non-traveled areas will be swept and cleaned a minimum of 3 times per year.

The bulk material storage sites and the sweeping debris piles are checked every day as part of the Daily Fugitive Dust Inspection Sheet)reviewed . The inspection sheets confirms whether or not a wetting agent was necessary to control dust. The sheet also requires check off in case the daily mean temperature does not exceed 32 degrees Fahrenheit, if more than 0.1 inch of rain has occurred within the past 24 hours and whether or not the facility is manufacturing trucks. Sheets were reviewed at the facility and the March 15, 2021 and March 16, 2021 were obtained and reviewed. The records appeared to meet the requirements found in the fugitive dust plan.

GENERATORS:

The site services group is also responsible for a portion of the emergency generators at the facility. They have 7 emergency generators all <500 HP which are operated as exempt under Rule 285(g). The emergency generators are required to have a non-resettable hour meter and keep track of hours per calendar year. We did visit an emergency fire pump generator this time. Monica also provided a copy of the annualized hours of operation for each engine (attached to this report). 40 CFR MACT ZZZZ requires the engines not be used more than 100 hours per calendar year for testing and maintenance purposes. The records show each engine to be under 30 hours for calendar year 2021. Emergency hours are unlimited, however 5.5 hours was the maximum one of the engines ran for emergency purposes in 2021. 4 engines are existing CI <500 HP, 3 are existing SI <500 HP and 1 is a new CI < 500 HP.

FG-CIRICEMACT

As mentioned under generators all engines in this FG operated less than 30 hours for the 2021 year. Additional information was requested for oil filter changes, belt and hose inspections. Monica followed up with the required information via email on April 26, 2022.

FG-SIRICEMACT

As mentioned under generators all engines in the FG operated less than 30 hours for the 2021 year. Additional information was requested for oil filter changes. Monica follow up with the required information for 2 engines via email on April 26, 2022. The engine that did not have any records had been removed from the site.

EU-ColdCleaners

The facility has 3 cold cleaners which are operated as exempt. A list of the 3 cold cleaners was obtained. From the report: Each unit uses cleaning solvent with < 0.1 reid vapor pressure and each have closing lids to be in compliance with Rule 707(3) (a)(i). Each has an air/vapor interface of less than 10 square feet. The cold cleaners are all operated as exempt under R281(h).

From the previous site inspections, the facility also operates the following equipment which appeared exempt based upon the MDEQ-AQD Part 2 exemptions:

The Main Site Services Shop consisted of the following equipment:

Woodworking equipment (band saw, table saws, planers, etc.) which were connected to a cyclone dust collector and vented outside exempt R285(l)(vi). Tin smith equipment for bending, shaping and rolling sheet metal exempt R285(l)(i). Pipe fitting equipment such as cutters and pipe threaders exempt R285(l)(vi). A tool crib area with various hand tools including electrical hand tools. An electrical crib area with various electrical supplies (wire, outlets, connectors, etc.). A mill right area with metal shears, a metal band saw, welders and torches exempt under R285(i) and R285(j). A painting area which included portable sprayers and equipment to paint parking lot lines exempt R287(j). Also, this area contains one of the cold cleaners R281(h). A mechanic's area for equipment repair which included a hot power washer, a sandblast cabinet with cyclone control R285(l)(vi) and welding equipment exempt R285(l)(vi). Finally, one of the cold cleaners R281(h).

From the previous site inspections, Sub Station 10 building which housed the power and utility workers. This facility contained: 3 large milling machines R285(l)(vi). One of the three listed cold cleaners, an arbor press, various torches R285(j) and several welding units R285(i). Sub Station 15 building which housed the electrically powered air compressors that supply all the compressed air to the automobile body, paint and assembly plant.

Conclusion:

A follow up email was sent on April 20, 2022 requesting information that was missing or not apparent for CI, SI RICE MACT engines, Boiler MACT applicability to other units, and Boiler MACT tune-up documentation for Lofton Center boilers. Responses were received on April 26, 2022 from Monica Johnson and April 27, 2022 from Kim

Cole via email and/or phone conversations. All information was clear to understand and verifiable. There are currently no outstanding items to be addressed at this time as section 5 of the facility appears to be in compliance with all applicable regulations based upon the information reviewed at this time.

NAME Robert Byrnes

DATE 05/23/2022

SUPERVISOR APRIL WENDLING 10/11/2022