



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
DETROIT



C. HEIDI GREYER
DIRECTOR

September 26, 2018

Mr. Bradford D. Huff, Plant Manager
Ford Motor Company, Dearborn Truck Plant
3001 Miller Road
Dearborn, MI 48120

SRN: A8648, Wayne County

Dear Mr. Huff:

VIOLATION NOTICE

On July 12, 2018, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of Ford Dearborn Truck Plant located at 3001 Miller Road, Dearborn, Michigan. The purpose of this inspection was to determine 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 Air Pollution Control Rules; and the conditions of Renewable Operating Permit (ROP) number MI-ROP-A8648-2015a;

After review of information provided from the inspection and the malfunction breakdown event 10 day report received on August 13, 2018, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
FG-CONTROLS	Rule 336.1910	RTO Tower #1 high temperature fault resulting in bypass of the RTO on August 3, 2018. The system faulted out on 5 occasions after start up. The burner system was scheduled for replacement in July but was delayed due to a supplier issue.

This constitutes a violation of Rule 910 of the administrative rules promulgated under Act 451, which requires that an air-cleaning device shall be installed, maintained, and operated in a satisfactory manner and in accordance with the administrative rules and existing law.

Please initiate actions necessary to correct the cited and submit a written response to this Violation Notice by October 17, 2018 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the burner

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malfunction occurred; an explanation of the causes and duration of the burner fault; whether the burner faults are ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the burner system and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence. Also, as previously discussed, the AQD would like an updated written response to all 10 day reports that have been provided in calendar year 2018 thus far.

Please submit the written response to the DEQ, AQD, Detroit District, at 3058 West Grand Boulevard, Detroit, Michigan 48202-6058 and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at the DEQ, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Ford Motor Company 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 RTO burner issue cited above and for the cooperation that was extended to me during my inspection of July 12, 2018. If you have any questions regarding the Violation Notice or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,



Robert Byrnes
Senior Environmental Engineer
Air Quality Division
517-275-0439

cc: Ms. Mary Ann Dolehanty, DEQ
Mr. Craig Fitzner, DEQ
Mr. Christopher Ethridge, DEQ
Ms. Jenine Camilleri, DEQ
Ms. Wilhemina McLemore, DEQ
Mr. Jeff Korniski, DEQ