



GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF
ENVIRONMENT, GREAT LAKES, AND ENERGY
DETROIT DISTRICT OFFICE



LIESL EICHLER CLARK
DIRECTOR

May 6, 2021

Mr. Erik Williams, Site Manager
Ford Motor Company
Wayne Stamping and Assembly & Michigan Assembly Plant
38303 Michigan Avenue
Wayne, Michigan 48184
SRN: A8650, Wayne County

Dear Mr. Williams:

VIOLATION NOTICE

On March 10, 2021 the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), received a Renewable Operating Permit Renewal Application Form and supporting information from Ford Motor Company (Ford). The Renewal Application Form serves as the application for the renewal of the Renewable Operating Permit for Ford’s Michigan Assembly Plant facility.

The Renewal Application Form and the supporting information provides that all of the carbon concentrators that were in place and operating as part of the emission control for the motor vehicle guidecoat and topcoat operations at the Michigan Assembly Plant facility have been removed, and all emissions from the guidecoat and topcoat operations are directed to regenerative thermal oxidizers (RTOs). The removal of the carbon concentrators as emission control equipment for the guidecoat and topcoat operations is a violation of requirements of the Michigan Assembly Plant facility’s current active and enforceable Renewal Operating Permit, as described in the following table.

Process Description	Rule/Permit Condition Violated	Comments
Manual and automatic guidecoat application process, identified as EU-GUIDECOAT.	Renewable Operating Permit (ROP) No. MI-ROP-A8650-2016a, Special Condition (SC) IV.1 of the EU-GUIDECOAT Emission Unit Conditions; R 336.2908(3)	This SC requires that EU-GUIDECOAT not operate unless the appropriate sections of FG-CONTROLS are installed, maintained and operated in a satisfactory manner. This SC puts forth that satisfactory operation of carbon adsorption wheels includes maintaining a minimum desorption gas inlet temperature of no more than

		<p>15° F below the average desorption gas inlet temperature during the most recent acceptable performance test values. The carbon adsorption wheels have been removed from operation.</p>
<p>Manual and automatic topcoat spray application process, identified as EU-TOPCOAT.</p>	<p>ROP No. MI-ROP-A8650-2016a, SC IV.1 of the EU-TOPCOAT Emission Unit Conditions; R 336.2908(3)</p>	<p>This SC requires that EU-TOPCOAT not operate unless the appropriate sections of FG-CONTROLS are installed, maintained and operated in a satisfactory manner. This SC puts forth that satisfactory operation of carbon adsorption wheels includes maintaining a minimum desorption gas inlet temperature of no more than 15° F below the average desorption gas inlet temperature during the most recent acceptable performance test values. The carbon adsorption wheels have been removed from operation.</p>
<p>Carbon adsorption units and regenerative thermal oxidizers used for control of VOC emissions from the paint spray booth and curing ovens, identified as FG-CONTROLS.</p>	<p>ROP No. MI-ROP-A8650-2016a, SC VI.2 of the FG-CONTROLS Flexible Group Conditions; R 336.1910; R 336.2908(3); 40 CFR 64.6(c)(1)(i), (ii)</p>	<p>This SC requires that the permittee install, calibrate, maintain and operate temperature monitoring devices for the carbon concentrator and the fluidized bed carbon concentrator in FG-CONTROLS to monitor and record the desorption gas inlet temperature for the carbon concentrator and the Desorber Middle SCR temperature for the fluidized bed carbon concentrator on a continuous basis during operation. The carbon</p>

		concentrators have been removed from operation at the facility.
Carbon adsorption units and regenerative thermal oxidizers used for control of VOC emissions from the paint spray booth and curing ovens, identified as FG-CONTROLS.	ROP No. MI-ROP-A8650-2016a, SC VI.5 of the FG-CONTROLS Flexible Group Conditions; R 336.1910; 40 CFR 64.6(c)(1)(i), (ii)	The SC requires the permittee to install, maintain and operate a pressure drip monitoring device for the fluidized bed concentrator to monitor and record the pressure drop on a continuous basis during operation. The fluidized carbon concentrator has been removed from operation at the facility.
EU-GUIDECOAT, EU-TOPCOAT, FG-CONTROLS	ROP No. MI-ROP-A8650-2016a, Section 1, General Conditions (GCs) 19, 21 and 23; R 336.1213(3)(c); R 336.1213(4)(c)	These GCs require the permittee to submit certified reports that clearly identify all instances of deviations from ROP requirements during semi-annual and annual reporting periods, The prior violations cited for EU-GUIDECOAT, EU-TOPCOAT and FG-CONTROLS were not reported as deviations in the most recent semi-annual and annual Renewable Operating Permit Report Certifications

The requirements put forth in ROP No. MI-ROP-A8650-2016a relating to the installation, maintenance and operation of carbon concentrators and fluidized bed carbon concentrators as part of FG-CONTROLS are active requirements. Accordingly, non-compliance with the conditions identified in the table above that relate to the installation, maintenance and operation of carbon concentrators and fluidized bed carbon concentrators are deviations from those ROP requirements. AQD Rules R 336.1213(3)(c) and R 336.1213(4)(c) require the reporting of deviations not less than one every 6 months, and annually, and the reports are to be certified by the facility's responsible official for their truth accuracy, and completeness after reasonable inquiry. These requirements are also incorporated into the facility's ROP at GCs 19, 21 and 23.

Please initiate actions necessary to correct the cited violations and submit a written

Mr. Erik Williams
Ford Motor Company
Page 4
May 6, 2021

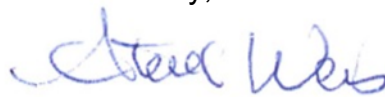
response to this Violation Notice by May 27, 2021 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates that the violations occurred; an explanation of the causes and duration of the violations; whether the violations are ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violations and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

Please submit the written response to EGLE, AQD, Detroit District, at 3058 West Grand Boulevard, Suite 2-300, Detroit, Michigan 48202 and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Ford believes that 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 violation cited above. If you have any questions regarding the violation or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,



Stephen Weis
Senior Environmental Engineer
Air Quality Division
313-720-5831

cc: Ms. Mary Ann Dolehanty, EGLE
Dr. Eduardo Olaguer, EGLE
Ms. Jenine Camilleri, EGLE
Mr. Christopher Ethridge, EGLE
Dr. April Wendling, EGLE
Mr. Jeff Korniski, EGLE
Ms. Annette Switzer, EGLE