

DEPARTMENT OF ENVIRONMENTAL QUALITY AIR QUALITY DIVISION

FCE Summary Report

Facility:	Ford Motor Co	mpany -	Flat	Rock Asser	nbly		SRN:	N0929
Location :	1 INTERNAT	ONAL D	R				District :	Detroit
							County:	WAYNE
City:	FLAT ROCK	State:	МІ	Zip Code :	48134	Comp		Compliance
Source Cla	iss: MAJOR					Staf	f: Jonath	nan Lamb
FCE Begin	Date : 6/28/20	15				FCE Date	Completion	6/28/2016
Comments	•							

List of Partial Compliance Evaluations:

Activity Date	Activity Type	Compliance Status	Comments
06/28/2016	Scheduled Inspection	Compliance	Scheduled inspection, FY 2016
06/15/2016	Stack Test	Compliance	Test report for RCO Outlet Concentration Monitoring received on May 4, 2016. Testing was performed on March 30, 2016, by BTEC and observed by Tom Maza of AQD. Reported results show the following average outlet VOC concentrations: RCO A: 5.6 ppmv; RCO B: 6.6 ppmv; RCO C: 2.7 ppmv. Average VOC outlet concentration for the whole RCO Control System was 5.0 ppmv, which is in compliance with MI- ROP-N0929-2011a, EU-Topcoat, IV.1, which requires the company to meet either an outlet concentration of 5 ppm VOC or demonstrate 95% destruction efficiency for the RCO Control System.
05/31/2016	MAERS	Compliance	Reviewed 2015 MAERS. Facility reported 553 tons of VOC emissions in 2015. Supporting documentation was provided for emission calculations. Facility will be inspected this fiscal year, so a more thorough review of emission records will be performed at that time.
05/23/2016	CAM Excursions/Exceedan ces	Compliance	Facility certifies compliance with CAM requirements except for the excursions listed in the Semi-Annual ROP Deviation report.

Activity Date	Activity Type	Compliance Status	Comments
05/23/2016	MACT (Part 63)	Compliance	40 CFR 63 Subpart DDDDD (Boller MACT) Notification of Compliance and Unit Tune-Up for units subject to major source Boiler MACT was submitted to EPA on February 12, 2016.
05/23/2016	ROP Annual Cert	Compliance	12 deviations reported. Facility reported a deviation for a computer coding error which caused VOC emissions to be underreported by 3.6 tons; this error was discovered and corrected on 12/18/15 and facility submitted corrected emission reports to AQD. Other deviations included bypass damper opening (addressed in the semiannual reports) and minor deviations of short duration.
05/23/2016	ROP SEMI 2 CERT	Compliance	Facility reported five deviations. Facility reported eleven separate damper openings totaling 258 minutes as one deviation. Facility also reported a deviation for a computer coding error which caused VOC emissions to be underreported by 3.6 tons; this error was discovered and corrected on 12/18/15 and facility submitted corrected emission reports to AQD.
05/23/2016	MACT (Part 63)	Compliance	Semi-annual compliance report for 40 CFR 63, Subpart IIII (Auto MACT). Compliance option stated in 40 CFR 63.3091(b) is used since the e-coat does not contain HAPs. Facility reports no deviations to Auto MACT requirements.
05/09/2016	ROP Qrtly Cert	Compliance	Emission/material usage report, 1st Quarter 2016.
03/14/2016	ROP Other	Compliance	2015 MAERS Report/ROP Certification Form.
02/03/2016	Odor Evaluation	Compliance	Odor evaluation performed by Odor Science & Engineering, Inc. (contracted by Ford), and observed by DEQ-AQD District staff.
02/03/2016	Complaint Investigation	Compliance	Odor complaint.
01/27/2016	ROP Qrtly Cert	Compliance	Emission/material usage report, 4th Quarter 2015.

Activity Date	Activity Type	Compliance Status	Comments
12/30/2015	ROP Qrlly Cert	Compliance	Revised quarterly emissions report for 1st, 2nd, and 3rd Quarters, 2015. Due to a software issue, the facility did not report 3.6 tons of topcoat VOC emissions in the previous quarterly reports, which are now corrected to accurately reflect the emissions during that time period.
11/09/2015	ROP Qrtly Cert	Compliance	Emission/material usage report, 3rd Quarter 2015.
10/22/2015	CAM Excursions/Exceedan ces	Compliance	Facility certifies compliance with CAM requirements except for the excursions listed in the Semi-Annual ROP Deviation report.
10/22/2015	ROP Semi 1 Cert	Non Compliance	Originally received on 9/15/2015; resubmitted at AQD's request on 1/22/2016 to include an additional deviation for RCO noncompliance with 95%DE/5 ppm outlet concentration limit from Jan. 1 through March 18, 2015, when testing demonstrated compliance. Six additional deviations reported during the time period; of note, eight separate damper openings totaling 234 minutes allowed emissions to be released uncontrolled to atmosphere. Other deviations reported were short in duration and involved mechanical/electrical issues resulting in minor releases to atmosphere. These deviations will be further evaluated during the next compliance evaluation in 2016.
10/22/2015	MACT (Part 63)	Compliance	Semi-annual compliance report for 40 CFR 63, Subpart PPPP (Plastics MACT). Compliance option stated in 40 CFR 63.4491 (b) used to demonstrate compliance. Facility reported an average 0.20 lbs HAP/lbs coating solid during the previous 12-month period.
10/22/2015	MACT (Part 63)	Compliance	Semi-annual compliance report for 40 CFR 63, Subpart IIII (Auto MACT). Compliance option stated in 40 CFR 63.3091(b) is used since the e-coat does not contain HAPs.
10/21/2015	ROP Qrtly Cert	Compliance	Emission/material usage report, 2nd Quarter 2015.
10/16/2015	Complaint Investigation	Non Compliance	Odor complaint investigation

Activity Date	Activity Type	Compliance Status	Comments
10/15/2015	Complaint Investigation	Non Compliance	Odor complaint investigation
08/25/2015	Complaint Investigation	Non Compliance	Odor complaint investigation
08/24/2015	Complaint Investigation	Non Compliance	Odor complaint investigation
08/04/2015	Complaint Investigation	Compliance	Odor complaint investigation

Name: Asm Da

Date: 9-30-16

Supervisor:

Page 4 of 4