

N0929
MAERS FCE

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION

FCE Summary Report

Facility : Ford Motor Company - Flat Rock Assembly	SRN : N0929
Location : 1 INTERNATIONAL DR	District : Detroit
	County : WAYNE
City : FLAT ROCK State: MI Zip Code : 48134	Compliance Status : Non Compliance
Source Class : MAJOR	Staff : Jonathan Lamb
FCE Begin Date : 9/11/2016	FCE Completion Date : 9/11/2017
Comments : Inspection performed August 22 and September 11, 2017.	

List of Partial Compliance Evaluations :

Activity Date	Activity Type	Compliance Status	Comments
08/22/2017	Scheduled Inspection	Non Compliance	Scheduled inspection, FY 2017
08/04/2017	ROP Qrtly Cert	Compliance	Emission/material usage report, 2nd Quarter 2017.
06/26/2017	Complaint Investigation	Non Compliance	Odor complaint investigation
05/22/2017	Other	Compliance	Review of 2016 MAERS
05/22/2017	ROP Other	Compliance	2016 MAERS ROP Certification Form
05/22/2017	MAERS	Compliance	

Activity Date	Activity Type	Compliance Status	Comments
05/10/2017	Stack Test	Compliance	Test report for RCO Destruction Efficiency and Outlet Concentration received on April 24, 2017. Testing was performed on March 22, 2017, by BTEC and observed by Tom Maza and Jon Lamb of AQD. Results show a destruction efficiency of 91% and an average VOC outlet concentration of 4 ppmv for the whole RCO Control System, which demonstrates compliance with the VOC outlet concentration 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. Note that during testing, RCO A and B were operated at higher temperatures than previous compliance testing and should remain operated at temperatures at or above the temperatures recorded during testing to be considered to be operating in compliance. The following minimum combustion temperatures were recorded during the testing: RCO A = 1176 F; RCO B = 1220 F; and RCO C = 1037 F.
04/28/2017	ROP Qrtly Cert	Compliance	Emission/material usage report, 1st Quarter 2017.
04/12/2017	ROP SEMI 2 CERT	Compliance	6 deviations reported. Facility reported a deviation for failing to meet the RCO System minimum DE/VOC outlet concentration during testing on 10/16/16; AQD issued a VN for this on 12/8/16. all other reported deviations were related to short-term by-pass damper openings due to mechanical or computer errors. Total time by-pass dampers were opened was under 7 hours, with no single event lasting over 27 minutes. Facility appeared to take proper corrective actions to minimize duration and occurrence of openings.

Activity Date	Activity Type	Compliance Status	Comments
04/12/2017	ROP Annual Cert	Compliance	11 deviations reported. Facility reported a deviation for failing to meet the RCO System minimum DE/VOC outlet concentration during testing on 10/16/16; AQD issued a VN for this on 12/8/16. Facility reported a deviation for failing to perform annual oil/filter changes on 14 emergency generators in 2014 and record hours of operation for the Body Shop emergency generator from 2013-2015. All generators were operated only during maintenance checks, less than 50 hours per engine. The other reported deviations were related to short-term by-pass damper openings due to various causes (addressed in the semiannual reports) and minor deviations of short duration.
04/12/2017	MACT (Part 63)	Compliance	40 CFR 63 Subpart DDDDD (Boiler MACT) Notification of Compliance and Unit Tune-Up for units subject to major source Boiler MACT was submitted to EPA on March 1, 2017.
04/12/2017	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.
04/12/2017	CAM Excursions/Exceedances	Compliance	Facility is certifying compliance with CAM requirements except for the excursions described in the Title V deviation forms.

Activity Date	Activity Type	Compliance Status	Comments
03/03/2017	Stack Test	Compliance	Test report for RCO Outlet Concentration Monitoring received on February 21, 2017. Testing was performed on January 27, 2017, by BTEC and observed by Tom Maza of AQD. Reported results show the following average outlet VOC concentrations: RCO A = 2.1 ppmv; RCO B = 3.1 ppmv; RCO C = 3.9 ppmv. Average VOC outlet concentration for the whole RCO Control System was 3.0 ppmv. OCM testing is for monitoring purposes, not to demonstrate compliance, but results show VOC outlet concentrations 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. Note that during testing, RCO A and B were operated at higher temperatures than normal. The following combustion temperatures were reported: RCO A = 1179 F; RCO B = 1258 F; and RCO C = 1026 F.
01/26/2017	Complaint Investigation	Non Compliance	Odor complaint investigation
01/25/2017	ROP Qrtly Cert	Compliance	Emission/material usage report, 4th Quarter 2016.
01/13/2017	Stack Test	Compliance	Transfer Efficiency and Booth/Oven Capture Efficiency results based on testing performed the week of Oct. 24, 2016, for the Lincoln Continental. Testing was performed by JLB Industries, LLC, and was observed by Mark Dziadosz of AQD. The following results were reported: Average TE: 78.4%; Prime Booth CE: 84.3%; Prime Oven CE: 10.5%; Basecoat Booth CE: 76.7%; Basecoat Oven CE: 13.0%; Clearcoat Booth CE: 48.2%; and Clearcoat Oven CE: 36.9%.

Activity Date	Activity Type	Compliance Status	Comments
12/06/2016	Stack Test	Non Compliance	Test report for RCO Outlet Concentration Monitoring received via email on December 1, 2016 (hard copy received December 5); FRAP was given a 15-day extension to submit the test report to AQD. Testing was performed on October 18, 2016, by BTEC and observed by Tom Maza of AQD. Reported results show the following average outlet VOC concentrations: RCO A = 4.8 ppmv; RCO B = 8.8 ppmv; RCO C = 3.7 ppmv. Average VOC outlet concentration for the whole RCO Control System was 6.0 ppmv and DE was 90%, which is not 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.
12/06/2016	ROP Other	Compliance	Facility submitted notification of the installation of a 7,000-gallon purge solvent recovery tank and a 7,000-gallon waste paint recovery tank (in a letter dated October 19, 2016), as allowed as part of the Flexible Permitting Initiative under the facility's Title V permit. The tanks will be used to replace the current use of totes for storage of these materials. Facility provided documentation that the new emission units will not be an increase over current allowable emission limits, nor be a major source of HAPs. The facility provided additional information regarding the capacity of each tank via email on December 5, 2016, per AQD's request.
11/28/2016	ROP Qrtly Cert	Compliance	Emission/material usage report, 3rd Quarter 2016. Report was dated Oct. 27, 2016, but not received until Nov. 7, 2016, more than 30 days after the end of the quarter.

Activity Date	Activity Type	Compliance Status	Comments
10/19/2016	ROP Semi 1 Cert	Compliance	5 deviations reported. Facility reported a deviation for failing to perform annual oil/filter changes on 14 emergency generators in 2014 and record hours of operation for the Body Shop emergency generator from 2013-2015. All generators were operated only during maintenance checks, less than 50 hours per engine, and were in compliance starting 2016. All other reported deviations were related to short-term by-pass damper openings due to mechanical or computer errors. Total time by-pass dampers were opened was under 5 hours, with no single event lasting over 26 minutes. Facility appeared to take proper corrective actions to minimize duration and occurrence of openings.
10/19/2016	MACT (Part 63)	Compliance	40 CFR 63 Subpart DDDDD (Boiler MACT) Notification of Compliance and Unit Tune-Up for units subject to major source Boiler MACT was submitted to EPA on March 1, 2017.
10/19/2016	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.
10/19/2016	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 0.13 lbs HAP/lbs coating solid during the previous 12-month period.
10/19/2016	CAM Excursions/Exceedances	Compliance	Facility is certifying compliance with CAM requirements except for the excursions described in the Title V deviation forms.

Name:

Veronica Long

Date:

9-26-17

Supervisor:

JK