



GRETCHEN WHITMER
GOVERNOR

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



LIESL EICHLER CLARK
DIRECTOR

February 27, 2020

Ms. Magda Medlewska-Wyrwa
Ford Motor Company – Flat Rock Assembly Plant
1 International Drive
Flat Rock, Michigan 48134-9401

SRN: N0929, Wayne County

Dear Ms. Medlewska-Wyrwa:

VIOLATION NOTICE

On February 18 and 21, 2020, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), investigated complaints regarding nuisance odors alleged to be the result of operations at Ford Motor Company – Flat Rock Assembly Plant, located at 1 International Drive, Flat Rock, Michigan. The purpose of these investigations were to determine Flat Rock Assembly Plant’s 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 administrative rules; and the conditions of Renewable Operating Permit (ROP) number MI-ROP-N0929-2018.

On February 18, 2020, Mr. Jonathan Lamb of the AQD performed an investigation from approximately 1:25 PM to 2:40 PM. On February 21, 2020, Mr. Lamb performed investigations from approximately 8:50 AM to 9:20 AM and from 11:40 AM to 12:10 PM. During these investigations, the following air pollution violation was observed:

Process Description	Rule/Permit Condition Violated	Comments
Automobile Assembly Plant	R 336.1901(b); ROP No. MI-ROP-N0929-2018, Section A – General Condition 12.b	Moderate to Strong (Level 3 and 4) paint/solvent and booth oven-type odors observed emitting from the facility and impacting nearby neighborhoods.

During the investigations on February 18 and 21, 2020, persistent, moderate to strong paint/solvent odors and paint booth oven-type odors were detected in residential areas downwind of Flat Rock Assembly Plant and were determined to be attributable to the facility’s operations. Odors were not observed upwind of the facility.

Ms. Magda Medlewska-Wyrwa
Ford Motor Company – Flat Rock Assembly Plant
Page 2
February 27, 2020

R 336.1901(b) states, in part:

“A person shall not cause or permit the emission of an air contaminant in quantities that cause injurious effects to human health and property, or the unreasonable interference with the comfortable enjoyment of life and property.”

In AQD staff’s professional judgment, the odors observed were of sufficient intensity and duration to constitute a violation of R 336.1901(b) and General Condition 12.b of ROP No. MI-ROP-N0929-2018.

Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by March 19, 2020 (which coincides with 21 calendar days from the date of this letter). The written response should include: the date the violation occurred; an explanation of the causes and duration of the violation; whether the violation is ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violation 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 the 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 the EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Ford Flat Rock Assembly Plant 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 violation cited above. Should you require any further information, please contact me.

Sincerely,



Jonathan Lamb
Senior Environmental Quality Analyst
Air Quality Division
313-456-4683

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