

STATE OF MICHIGAN
DEPARTMENT OF NATURAL RESOURCES
OFFICE OF DIRECTOR

)
In the matter of administrative)
proceedings involving FORD MOTOR)
COMPANY, a corporation organized)
under the laws of the State of)
Delaware and doing business at)
50500 Mound Road, Township of Shelby,)
County of Macomb, State of Michigan.)

SIP No. 39-1993

STIPULATION FOR ENTRY OF
FINAL ORDER BY CONSENT

This proceeding results from provisions of the Federal Clean Air Act ("CAA"), 42 U.S.C. Section 7401 et seq., as amended by the Clean Air Act Amendments of 1990, P.L. No. 101-549, 104 Stat. 2399 (Nov. 15, 1990), that designate Macomb County as "moderate" non-attainment for ozone and require a State Implementation Plan ("SIP") that provides for the implementation of reasonably available control technology ("RACT") with respect to all major sources of volatile organic compounds ("VOCs") that are located in the non-attainment area.

The Ford Motor Company, ("Company") owns and operates Ford Motor Company, Utica Trim Plant ("Utica Plant"), which is an automotive component plant located at 50500 Mound Road, Township of Shelby, County of Macomb, State of Michigan. The Michigan Department of Natural Resources ("MDNR") alleges that the Utica Plant is a major source of VOC emissions which is subject to the RACT requirements of the Federal CAA.

The Company and the MDNR stipulate as follows:

1. The MDNR Director is authorized by Executive Order 1991-31 of the Governor of the State of Michigan to administer and enforce the Air Pollution Act ("Act 348"), 1965 as amended, MCL 336.11 et seq; MSA 14.58(1) et seq.

2. The MDNR Director is charged with the investigation and enforcement of all orders, regulations, rules, standards, and statutes of the State of Michigan concerning the emission and control of air contaminants.

3. The termination of this matter by a Final Order to be entered by consent pursuant to Section 9 of Act 348, MCL 336.19, MSA 14.58(19), is proper and acceptable.

4. The signing of this stipulation does not constitute an admission by the Company that the law has been violated.

5. This final order by consent does not arise from an enforcement action of the MDNR. The purpose of this final order by consent is to embody the requirements of Section 182(b)(2)(c) of the Federal CAA pertaining to the application of RACT at a major source of VOC in an ozone nonattainment area.

COMPLIANCE PROGRAM IMPLEMENTATION SCHEDULE

5. A. Emission Limitations--RIM Presses

- (1) On and after October 31, 1993, the VOC content of the soap mold release agent (MRA) used with the internal mold release (IMR) on the 22 RIM presses: G1 to G11, F1 to F6, and J2-2 to J2-6 shall not exceed 1.8 pounds per gallon of MRA, minus water, as applied.
- (2) On and after October 31, 1993, the VOC content of the MRA applied on the 22 RIM presses: G1 to G11, F1 to F6, and J2-2

to J2-6 shall not exceed 6.4 pounds per gallon of MRA, minus water, as applied.

- (3) On and after October 31, 1993, the total VOC emitted from the application of MRA and IMR on the 22 RIM presses: G1 to G11, F1 to F6, and J2-2 to J2-6 shall not exceed 670 pounds per day nor 100 tons per year.

B. Emission Limitations - Soft Foam Seating Line A/H

- (1) On and after October 31, 1993, the VOC content of the MRA applied on Soft Foam Seating Line A/H shall not exceed 6.3 pounds of VOC per gallon of MRA, minus water, as applied.
- (2) On and after March 31, 1995, any of the following methods shall be implemented:
 - (a) MRA application spray patterns shall be controlled by externally programmed high speed robotic equipment. All spray equipment and robotic equipment shall be installed, maintained and operated in accordance with the recommendations and design of the equipment manufacturer; or,
 - (b) MRA applied shall consist of a water-borne formulation for which the VOC content of the MRA shall not exceed 1.7 pounds of VOC per gallon of MRA, minus water, as applied; or,
 - (c) MRA applied shall consist of a super-critical carbon dioxide formulation for which the VOC content of the

MRA shall not exceed 2.0 pounds of VOC per gallon of MRA, minus water, as applied; or,

- (d) MRA shall be applied in a spray booth in which the exhaust shall be discharged to a VOC control device (carbon adsorption, incineration or combination) which shall result in an 81 percent VOC control efficiency.
- (3) On and after March 31, 1995, the total VOC emitted from the application of MRA on Soft Foam Seating Line A/H shall not exceed 2100 pounds per day nor 200 tons per year.

C. Emission Limitations - Soft Foam Headrest Line C

- (1) On and after October 31, 1993, the VOC content of the MRA applied on Soft Foam Headrest Line C shall not exceed 6.2 pounds per gallon of MRA, minus water, as applied.
- (2) On and after May 31, 1995, any of the following methods shall be implemented:
 - (a) MRA application spray patterns shall be controlled by externally programmed high speed robotic equipment. All spray equipment and robotic equipment shall be installed, maintained and operated in accordance with the recommendations and design of the equipment manufacturer; or,
 - (b) MRA applied shall consist of a water-borne formulation for which the VOC content of the MRA shall not exceed 1.7 pounds of VOC per gallon of MRA, minus water, as applied; or,

- (c) MRA applied shall consist of a super-critical carbon dioxide formulation for which the VOC content of the MRA shall not exceed 2.0 pounds of VOC per gallon of MRA, minus water, as applied; or,
 - (d) MRA shall be applied in a spray booth in which the exhaust shall be discharged to a VOC control device (carbon adsorption, incineration or combination) which shall result in an 81 percent VOC control efficiency.
- (3) On and after May 31, 1995, the total VOC emitted from the application of MRA on Soft Foam Headrest Line C shall not exceed 530 pounds per day nor 50 tons per year.

D. Emission Limitations - Side Bolster Pads Line B

- (1) From October 31, 1993 and until May 30, 1995, the VOC content of the MRA applied on Side Bolster Pads Line B shall not exceed 6.2 pounds per gallon of MRA, minus water, as applied.
- (2) On and after May 31, 1995, the MRA applied on Side Bolster Pads Line B shall consist of a water-borne formulation for which the VOC content of the MRA shall not exceed 1.7 pounds of VOC per gallon of MRA, minus water, as applied.
- (3) On and after May 31, 1995, the total VOC emitted from the application of MRA on Side Bolster Pads Line B shall not exceed 160 pounds per day nor 15 tons per year.

E. Emission Limitations - Paste Wax: Soft Foam Seating Line A/H, Soft Foam Headrest Line C, and Side Bolster Pad Line B

- (1) On and after October 31, 1993 the VOC content of the paste wax used on Soft Foam Seating Line A/H shall not exceed 4.7 pounds of VOC per gallon of paste wax, minus water, as applied.
- (2) On and after October 31, 1993 the VOC content of the paste wax used on Soft Foam Headrest Line C shall not exceed 4.7 pounds of VOC per gallon of paste wax, minus water, as applied.
- (3) On and after October 31, 1993 the VOC content of the paste wax used on Side Bolster Pad Line B shall not exceed 4.7 pounds of VOC per gallon of paste wax, minus water, as applied.
- (4) On and after October 31, 1993 the total VOC emitted from the application of paste wax on Soft Foam Seating Line A/H, Soft Foam Headrest Line C, and Side Bolster Pad Line B, combined, shall not exceed 95 pounds per day nor 9 tons per year.

F. Emission Limitations - Headliners

- (1) On and after October 31, 1993, the adhesive applied on Headliner Lines 1,2,3 and 4, and the Lembo Laminator Headliner Line shall consist of a water-borne formulation for which the VOC content of the adhesive on each line shall not exceed 1.0 pounds of VOC per gallon of adhesive, minus water, as applied.

- (2) On and after October 31, 1993, the total VOC emitted from the application of adhesive on Headliner Lines 1, 2, and 4 shall not exceed 75 pounds per day, nor 9 tons per year, combined.
- (3) On and after October 31, 1993, the total VOC emitted from the application of adhesive on Headliner Line 3 shall not exceed 22 pounds per day, nor 2.8 tons per year.
- (4) On and after October 31, 1993, the total VOC emitted from the application of adhesive on the Lembo Laminator Headliner Line shall not exceed 170 pounds per day, nor 25.6 tons per year.

G. Emission Limitations - Vacuum Forming

- (1) On and after October 31, 1993, the total VOC emitted from the application of adhesive on Door Panel Line 9 shall not exceed 396 pounds per day, nor 34.4 tons per year.
- (2) On and after October 31, 1993, the VOC content of the adhesive applied on Vacuum Forming Door Panel Line 9 shall not exceed 1.0 pounds of VOC per gallon of adhesive, minus water, as applied.
- (3) From January 1, 1994 and until May 30, 1995, the total VOC emitted from the application of adhesive on Vacuum Forming Door Panel Line 11/12 shall not exceed 2200 pounds per day nor 158 tons per year.
- (4) On and after May 31, 1995, the adhesive applied on Vacuum Forming Door Panel Line 11/12 shall consist of a water-borne

formulation for which the VOC content of the adhesive shall not exceed 1.5 pounds of VOC per gallon of adhesive, minus water, as applied.

- (5) On and after May 31, 1995, the total VOC emitted from the application of adhesive on Vacuum Forming Door Panel Line 11/12 shall not exceed 600 pounds per day nor 35 tons per year.

H. Emission Limitations - Edgefolding

- (1) On and after October 31, 1993, the VOC content of the adhesive applied on Edgefolding Door Panel Line 5, 7 and 8 shall not exceed 5.3 pounds of VOC per gallon of adhesive, minus water, as applied, for each line.
- (2) On and after October 31, 1993, the total VOC emitted from the application of adhesive on Edgefolding Door Panel Lines 5, 7 and 8 shall not exceed 1200 pounds per day nor 65 tons per year.
- (3) On and after October 31, 1993, the VOC content of the adhesive applied on Edgefolding Door Panel Line 2 shall not exceed 1.6 pounds per gallon of adhesive, minus water, as applied.
- (4) On and after October 31, 1993, the total VOC emitted from the application of adhesive on Edgefolding Door Panel Line 2 shall not exceed 243 pounds per day nor 36.3 tons per year.

I. Emission Limitations - Pressure Bonding

- (1) On and after October 31, 1993, the VOC content of the adhesive applied on Pressure Bonding Door Panel Line 13 shall not exceed 6.2 pounds of VOC per gallon of adhesive, minus water, as applied.
- (2) On and after October 31, 1993, the adhesive applied on Pressure Bonding Door Panel Line 13 shall not exceed 912 pounds per day, nor 113.7 tons per year.

TESTING AND RECORDKEEPING

6. The VOC contents of any IMR/soap formulation, MRA, or adhesive used on any of the following process lines as applied shall be determined using Federal Reference Test Method 24: the 22 RIM Press Lines: G1 to G11, F1 to F6, and J2-2 to J2-6, Soft Foam Seating Line A/H, Soft Foam Headrest Line C, Side Bolster Line B, Headliner Lines 1, 2, 3, and 4, the Lembo Laminator Headliner Line, Vacuum Forming Door Panel Lines 9 and 11/12, Edgefolding Door Panel Lines 2, 5, 7, and 8, and Pressure Bonding Door Panel Line 13.

7. The Company shall keep and record for each process line the VOC content, the total gallons of IMR/soap formulation, MRA, or adhesive applied during the calendar month, and the hours of operation for each day. Daily VOC emission rates shall be calculated by multiplying the appropriate VOC content by the total gallons applied during the month and dividing by the total hours of operation for that month, then multiplying by the hours of operation for each day. Yearly emission limits shall be calculated by summing the appropriate monthly figures over a calendar year. This information shall be kept on file for

a period of at least two years and made available to the Air Quality Division of the MDNR upon request.

GENERAL PROVISIONS

8. Upon entry, this final order by consent, along with other supporting documentation required by the U.S. Environmental Protection Agency (USEPA), shall be submitted to the USEPA for approval as a revision to the Michigan SIP in accordance with Sections 110 and 182 of the Federal CAA. This Consent Order shall become effective immediately upon entry, except that this final order by consent shall have no effect on the federally-approved SIP unless and until the submitted SIP revision request is formally approved by the USEPA.

9. Upon adoption by the MDNR, and upon approval by the USEPA, of operating permit rules to implement the Permit Modification provisions recited at 40 CFR 70.7 (e), the Company may modify a process referred to in this final order by consent according to the terms and conditions contained in the operating permit rules.

10. This final order by consent terminates upon the MDNR's issuance to the facility of a Title V operating permit.

11. Pursuant to Section 120 of the Federal CAA, PL 95-95, as amended, the Company may be required to pay a noncompliance penalty for failure to comply with rules which have been promulgated under the Air Pollution Act and which are part of the USEPA approved SIP for the State of Michigan.

12. This abatement program is not a variance subject to the 12 month limitation specified in Section 22 of the Air Pollution Act, being MCLA 336.32.

13. The provisions of this final order by consent shall be binding on the parties to this action, their officers, servants, employees, and attorneys and

on those persons in active concert or participation with them who receive actual notice to this order. In the event Ford Motor Company sells or transfers the facility located at 50500 Mound Road, Township of Shelby, Michigan, it shall advise the purchaser or transferee of the existence of this order in connection with such sale or transfer. Within 30 calendar days, Ford Motor Company shall also notify the MDNR, in writing of such sale or transfer, the identity and address of any purchaser or transferee, and confirm the fact that notice of this order has been given to the purchaser or transferee.

14. The MDNR and the Company both acknowledge that a public hearing on this abatement program was held on September 21, 1993. Enforcement of this final order by consent shall be in the same manner and by the same procedures for all final orders entered pursuant to Section 16 of 1965 PA 348, as amended, MCLA 336.26; MSA 14.58(16), including enforcement pursuant to the Michigan Environmental Protection Act ("MERA"), 1970 PA 127, MCLA 691.1201 et seq; MSA 14.528(201) et seq.

The undersigned, who is signing this stipulation and final order by consent for the Company, certifies that he/she is fully authorized by the Company to enter into this stipulation and final order by consent and to execute and legally bind the Company to it.

Approved as to Form and Content:

FORD MOTOR COMPANY
By: [Signature] J. M. Rintamaki
Dated: OCT 21 1993 Secretary

The above signatory subscribed and sworn to before me this 21st day of October, 1993.

[Signature]
Notary Public MARILYN F. TAULBEE
Notary Public, Wayne County, Mich.
My Commission Expires September 24, 1994

Approved as to Content:

[Signature]
Dennis M. Drake, Acting Chief
AIR QUALITY DIVISION
DEPARTMENT OF NATURAL RESOURCES
Dated: 11/12/93

Approved as to Form:

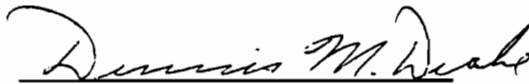
[Signature]
A. Michael Leffler
Assistant Attorney General
DEPARTMENT OF ATTORNEY GENERAL
Dated: 11/12/93

FINAL ORDER

The MDNR Director having had opportunity to review the above stated Stipulation and Final Order by Consent and the MDNR Director having authorized the Chief of the Air Quality Division of the Department of Natural Resources as agent of the Office of the Director to enter into consent orders,

IT IS ORDERED that this stipulation and order be approved and be entered in the record of the MDNR as a Final Order by Consent.

STATE OF MICHIGAN
DEPARTMENT OF NATURAL RESOURCES
AIR QUALITY DIVISION

By: 
Dennis M. Drake
Acting Chief

Dated: 11/12/93