STATE OF MICHIGAN
DEPARTMENT OF NATURAL RESOURCES
OFFICE OF THE DIRECTOR

In the matter of administrative proceedings involving the **FORD MOTOR COMPANY, ROUGE INDUSTRIAL COMPLEX**, a corporation organized under the laws of the State of Michigan and doing business at 3001 Miller Road in the City of Dearborn, County of Wayne, State of Michigan.	SIP No. 13-1993 Revised: 9/9/94

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 a portion of Wayne County as non-attainment for PM-10 (particulate matter less than 10 micrometers) and require a State Implementation Plan ("SIP"), based on legally enforceable control measures, that provides for a demonstration of attainment and maintenance of the primary National Ambient Air Quality Standard ("NAAQS") for PM-10 in Wayne County. Further, pursuant to Section 15 of the Michigan Air Pollution Act, 1965 PA 348, as amended ("Act 348"), companies in the standard industrial classifications listed in 15(1), and which are located in areas listed in Table 36 of R 336.1371 of the Michigan administrative code, are required to develop and implement an approved fugitive dust control operating program and to have the program embodied in a legally enforceable order or as part of an approved permit to install or operate.

The Ford Motor Company ("Company") owns and operates the Dearborn Engine Plant, Dearborn Frame Plant, Dearborn Glass Plant, Dearborn Stamping Plant, and the Dearborn Assembly Plant ("Plants"), which is an automotive manufacturing complex, located at 3001 Miller Road, City of Dearborn, County of Wayne, State of Michigan. The Michigan Department of Natural Resources ("MDNR") alleges that the Plants are a significant source of fugitive dust emissions which contribute to the non-attainment problem. Further, the requirements for the control of fugitive dust, set forth in Section 15 of Act 348, apply to the Plants.

The Company and the MDNR stipulate as follows:

1. The Air Pollution Act, 1965 PA 348, as amended, ("Act 348"), MCL 336.11 et seq; MSA 14.58(1) et seq is an act to control air pollution in this state.

2. The Director of the MDNR ("Director") is authorized pursuant to Section 5 of Act 348 to administer and enforce all provisions of Act 348.

3. The Director has delegated authority to the Air Quality Division ("AQD Chief") to enter into the Consent Order.

4. The resolution of this matter by a Consent Order pursuant to Section 16c of Act 348 is proper and acceptable.

5. This Consent Order becomes effective on the date of execution ("effective date of this Consent Order") by the AQD Chief.

6. The emissions of fugitive dust from the Plants are subject to the opacity limitations and prohibitions contained in Sections 15 and 15a of Act 348. The particulate matter and fugitive dust emissions from the Plants must not cause or contribute to a violation of the PM-10 NAAQS. Further, the CAA and Act 348 require the application of all reasonably available control measures ("RACM") for the control of PM-10 emissions.

7. The signing of this Consent Order does not constitute an admission by the Company that the law has been violated. This Consent Order is designed to ensure attainment and maintenance of the PM-10 NAAQS, compliance with Sections 15 and 15a of Act 348, and compliance with the RACM requirements of the CAA and Act 348.

COMPLIANCE PROGRAM

8. On and after the effective date of this Consent Order, the Company shall fully comply with the provisions and requirements of the fugitive dust control operating program and Recordkeeping for Fugitive Dust Sources Addendum, which is attached as Exhibit A, incorporated by reference, and made an enforceable part of this Consent Order.

RECORDKEEPING AND REPORTING

9. On and after the effective date of this Consent Order, the Company shall keep records as specified in Exhibit A.

10. On and after the effective date of this Consent Order, the records required pursuant to this Consent Order shall be kept on file at the Company for a period of at least two (2) years, and shall be made available to MDNR upon written or verbal request.

11. Beginning with the calendar quarter starting after the effective date of this Consent Order, and quarterly thereafter, the Company shall submit to MDNR a report identifying each day in which any emission limit, operational requirement, or recordkeeping requirement, as specified in Exhibit A, was not met. This report shall, for each instance, explain the reason that the emission limit, operational requirement, or recordkeeping requirement was not met, the

duration of the event, the remedial action taken, and a description of the steps which were taken to prevent a recurrence. The reports shall be submitted within 30 days following the end of the calendar quarter in which the data were collected.

GENERAL PROVISIONS

12. Upon entry, this Consent Order, along with other supporting documentation required by the United States Environmental Protection Agency ("U.S.EPA"), shall be submitted to the U.S.EPA for approval as a revision to the Michigan SIP in accordance with Part D, Section 171 et seq., of the Federal Clean Air Act, as amended by Section 105 of the Clean Air Act Amendments of 1990. This Consent Order shall become effective immediately upon entry, except that this Consent Order shall have no effect on the federally-approved SIP unless and until the submitted SIP revision request is formally approved by the U.S.EPA.

13. Upon entry of this Consent Order, the Company may change it's processes, modify the fugitive dust control program contained in Exhibit A, or modify the particulate emission control program contained in Exhibit B ("Control Programs"), in accordance with the following:

A. Process Change

(1) The Company may change it's operations or processes which are sources of particulate and fugitive dust provided all of the following conditions are met:

(a) The provisions of the Control Programs continue to apply to the subject operation or process;

(b) The change does not result in an increase in the level of fugitive dust or particulate emissions;

(c) The change is approved.

(2) The Company shall submit to MDNR a written description of the proposed change and how it meets the requirements of 13(A)(1).

(3) The MDNR shall approve or disapprove the proposed change, in writing, within 45 days from receiving a proposed change which meets the requirements of 13(A)(1).

(4) Should the MDNR disapprove the proposed change, the disapproval must describe the specific reasons for the decision and must be forwarded to the Company.

B. Control Program Revision

(1) The Company may revise the Control Programs provided both of the following conditions are met:

(a) The Company demonstrates*, in writing, that the proposed revision does not result in an increase in the level of fugitive dust or particulate emissions and submits the demonstration to the MDNR for approval.

(b) The revision is deemed approved.

(2) The MDNR shall approve or disapprove the proposed revision, in writing, within 45 days from receiving a proposed revision using an applicable U.S.EPA approved method to demonstrate the proposed revision meets the requirements of 13(B)(1).

(3) Should the MDNR disapprove the proposed revision, the disapproval must describe the specific reasons for the decision and must be forwarded to the Company.

C. U.S.EPA Notification

Upon approval of a change pursuant to subsection A above, or a substitution of a control measure pursuant to subsection B above, MDNR shall notify U.S.EPA, in writing, of the revised provisions which are enforceable for the facility.

D. Minor Modification

Upon adoption by the MDNR, and upon approval by U.S.EPA, of operating permit rules to implement the Permit Modification provisions recited at 40 CFR 70.7 (e), the Company may modify a fugitive dust or particulate emission source referred to in this Consent Order according to the terms and conditions contained in the operating permit rules.

E. Minor Modification Approval

Upon MDNR approval of a minor modification pursuant to subsection D above, the MDNR shall submit the approved minor modification to U.S.EPA as a proposed revision to the Michigan SIP.

F. Other Applicable Requirements

Any process change, control program revision, or minor modification made pursuant to this Paragraph does not affect the company's obligation to obtain a permit to install or operate required by Federal law or regula-

tion, or contained in Part 2 of the Air Pollution Control ("APC") Rules and any other applicable requirement contained in the APC Rules or Act 348.

* - Demonstrations made pursuant to 13(B)(1)(a) involving chemical dust suppressant applications on unpaved roads shall be made using only petroleum resins, asphalt emulsions, or acrylic cements unless otherwise explicitly provided for by the applicable U.S.EPA approved SIP or U.S.EPA approved method.

14. 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.

15. The provisions of this Consent Order 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 of this Consent Order. In the event the Ford Motor Company sells or transfers the Rouge Industrial Complex, it shall advise any purchaser or transferee of the existence of this Consent Order in connection with such sale or transfer. Within 30 calendar days, the Ford Motor Company shall also notify MDNR Staff, in writing of such sale or transfer, the identity and address of any purchaser or transferee, and confirm the fact that notice of this Consent Order has been given to the purchaser or transferee. The purchaser must provide written agreement, to the Company, to assume the compliance responsibilities of the Consent Order and provide a copy of the agreement to the MDNR Staff.

16. Pursuant to the requirements of Section 5h of Act 348, the public was notified of a 30-day public comment period on this Consent Order which began on

March 1, 1993 and a public hearing on this Consent Order which was held on March 30, 1993.

17. Section 16e of Act 348 may serve as a source of authority but not a limitation under which this Consent Order may be enforced. Further, the Michigan Environmental Protection Act ("MEPA"), 1970 PA 127, MCLA 691.1201 et seq; MSA 14.528(201) et seq; and all other applicable laws may be used to enforce this Consent Order.

I, the undersigned, who is signing this Stipulation and Order for the Company, certify that I am fully authorized by the Company to enter into this Consent Order and to execute and legally bind the Company to it.

Approved as to Form and Content:

_____

FORD MOTOR COMPANY
ROUGE INDUSTRIAL COMPLEX
TECHNICAL AND TRANSPORTATION SERVICES

By: _____

Dated: SEP 2 3 1994

The above signatory subscribed and sworn to before me this _____ day of SEP 2 3 1994, 1994.

Marilyn F. Taulbee
Notary Public

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

Approved as to Content:

Dennis M. Drake, Acting Chief
AIR QUALITY DIVISION
DEPARTMENT OF NATURAL RESOURCES

Dated: 10/12/94

Approved as to Form:

for

A. Michael Leffler
Assistant Attorney General, In Charge
NATURAL RESOURCES DIVISION
DEPARTMENT OF ATTORNEY GENERAL

Dated: 10/11/94

FINAL ORDER

The Chief of the Air Quality Division having had opportunity to review the Consent Order and having been delegated authority to enter into Consent Orders by the Director of the Michigan Department of Natural Resources pursuant to the provisions of the Air Pollution Control Act;

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

MICHIGAN DEPARTMENT OF NATURAL RESOURCES

By:
Dennis M. Drake, Acting Chief
Air Quality Division

Dated: 10/12/94

EXHIBIT A
FUGITIVE DUST CONTROL PLAN
FORD MOTOR COMPANY - ROUGE INDUSTRIAL COMPLEX

1. Facility Name and Address:

Ford Motor Company
Rouge Industrial Complex
3001 Miller Road
Dearborn, Michigan 48121

2. Title and Address of Responsible Person(s):

Manager, Technical and Transportation Services
Transportation and Rouge Services
Construction, Environmental, and Building Services
3001 Miller Road, Room 100, Construction Services Building
Dearborn, Michigan 48121
Phone: (313) 322-9495

Environmental Engineer
Technical and Transportation Services
Environmental Services
3001 Miller Road, Room 108 Construction Services Building
Dearborn, Michigan 48121
Phone: (313) 594-1014

3. Summary of Source Descriptions and Control Measures:

I. General Information

The Rouge Industrial Complex occupies approximately 1000 acres in the City of Dearborn, bounded by Schaefer Road to the west, I-94 and Rotunda Drive to the north, Miller Road to the east, and the Rouge River to the south. Ford Motor Company and Rouge steel Company, two independent entities, own and operate facilities in the Rouge Industrial Complex. A third entity at the site is Rouge Power and Utility Operations which is majority owned by Rouge Steel Company, minority owned by Ford Motor Company. Ford Motor Company conducts numerous process operations and service activities at the Rouge Industrial Complex related to automotive production.

A comprehensive fugitive dust control program has been developed for roadways and parking lots and bulk material storage sites. Control procedures are as follows:

II. Roadways and Parking Lots

A. Program Responsibility

A street sweeping and flushing program is presently conducted on a regular basis for control of dust emissions from paved areas. A dust suppressant application program is conducted on unpaved roads. Daily records will be maintained for a period of two years denoting the frequency and the roads/lot

segment being treated. Entries in the daily control practice log will specifically address:

- treatment location
- method of control
- meteorological conditions

The daily log will be kept on file at the Environmental Services Department Office in the Construction and Environmental Services Building between the hours of 7:00 AM and 3:00 PM weekdays.

B. Paved Area Control Practices

There are approximately 6.8 miles of paved roadways within the Rouge Industrial Complex owned by Ford Motor Company. A total of eight (8) paved parking lots are included in the dust control plan for Ford Motor Company, as shown in Figure 1. Asphalt is the predominant surfacing material on all paved areas. Treatment procedures employed for dust control on paved roadways and parking lots are primarily devoted to sweeping and flushing practices. Specific treatment procedures are described below.

(1) Wet Sweeping

(a) Roadways receiving wet sweeper or vacuum treatments on a daily schedule are listed in Figure 2. Daily treatments are applied to roadways as identified since they receive greatest traffic volume and consequently possess the largest dust loading potential. Roadways receiving alternate day treatment as identified in Figure 2 receive much lighter traffic volume and dust loading volume is commensurately reduced.

(b) The traveled portion of parking areas (Figure 1) will receive wet sweep treatments once per month. A greater frequency rate will be implemented on these areas if warranted due to extended dry weather. The non-traveled portion of parking lots will be swept and cleaned a minimum of three times per year.

(c) Materials and debris picked up during wet sweep activities will be transported and deposited in a designated holding site by sweeper equipment operator. Sweeping debris management plans are presented in item III. B.

(2) Street Flushing

All paved roadways in the Rouge Industrial Complex owned by Ford Motor Company will receive flusher treatments on either daily or alternate day rotational schedules, five days a week for eight months of the year when outside temperatures are above freezing. Roadway assignments and respective application frequencies are presented in Figure 2. Daily flusher treatments are applied to roadways having heavy dust loading potential based on roadway location, traffic volumes, and vehicle tonnages. Alternate day flushing treatments are applied to those roadways with light or medium dust loading.

(3) Equipment

Equipment utilized to implement the fugitive dust control plans is either on site or contracted as necessary.

(4) Schedule Change

Roadway treatment application schedules presented in this plan may be modified on a short term basis in response to adverse meteorological conditions or unusual circumstances requiring street cleaner equipment, such as spill situations or raw material handling. Daily or alternate day treatment procedures will be foregone when:

. Daily precipitation exceeds 0.1 in.
. Daily high temperature does not exceed 32 F
. Road salt is applied and for 48 hours thereafter

Preemptive treatment information will be provided in the daily log described at Section II. A.

(5) Additional Measures

(a) To control dust during scheduled raw material handling over paved surfaces, a flusher vehicle will sprinkle the truck hauling route.

(b) Speed signs have been posted on major paved roadways owned by Ford Motor Company throughout the Rouge Industrial Complex to maintain lower vehicular speeds. Maximum posted limit is 20 mph.

C. Unpaved Roads

There are approximately 0.3 miles of unpaved roadways within the Rouge Industrial Complex owned by Ford Motor Company. These are used primarily for occasional vehicular traffic to serve railroad operations and to deposit materials in the interim holding site. Paving has been eliminated as an alternative due to economic and structural considerations. Continuous watering has also been eliminated as a viable alternative due to traffic volumes and wetting characteristics of unpaved areas, seriously limiting control potential of this method.

Petro-Tac, manufactured and applied to the unpaved areas by Syn-Tech Products Corporation, is an asphalt emulsion and has been the selected agent for dust control on unpaved areas in the Rouge Industrial Complex by Ford Motor Company. It is applied at a 1:7 dilution at the rate of approximately 0.25 gallons per square yard, at a frequency of once per month.

III. Bulk Material Storage Sites

A. A monitoring program will be implemented for bulk material storage identified in the following descriptions. Remedial action implemented for fugitive dust control from these sources will be coordinated by Transportation and Rouge Services and recorded in the daily log described in Section II. A.

B. Construction Materials

Various bulk materials (for example, sand, gravel) used in various operations are occasionally stockpiled in small bulk quantities north of Gate 9 or at the construction/repair sites in the Complex itself. The size of the stockpiles are generally less than 100 yards. Due to the size class of these materials, stockpile throughput, and stockpile dimension, the fugitive dust emission potential is considered to be low. However, the material piles will be monitored on a daily basis and appropriate control measures effected to further reduce fugitive dust emission potential. This information will be logged as outlined under Section II. A.

Sweeping Debris

Waste materials generated during roadway and parking lot sweeping activities are deposited in an interim holding site north of Gate 9. The deposited volume present at any one time is less than 100 cubic yards. This three-sided enclosure reduces exposure to wind and minimizes fugitive emission potential from this source. Also, this material is scheduled for removal and ultimate disposal off-site in an approved landfill on an as-needed basis. The sweeping debris will be monitored on a daily basis and wetting agents applied, as necessary, to eliminate fugitive dust emissions. This data is logged as outlined in Section II. A.

C. Pollution Control Equipment

Sand employed to enhance braking and drive traction of railyard locomotives is inventoried in two (2) 30 cubic yard steel bulk tanks and two (2) 3 cubic yard dispensing tanks identified as the north and south locomotive sand towers (see Figure 1). Material is dispensed to and from the bulk tanks under pneumatic pressure. An exhaust type bag filter has been installed on each sand tower unit to control fugitive emissions from this operation. The bag filters will be monitored on a monthly schedule by railroad personnel and maintenance effected as needed for proper operation.

IV. Fugitive Dust Control Program
Additional Information

All treatment programs proposed for implementation on identical emission sources are considered capable of achieving emission reduction efficiencies required by RACT criteria.

(Note: See attached DNR Required Recordkeeping for Fugitive Dust Sources Addendum for additional information.)

ADDENDUM

RECORDKEEPING FOR FUGITIVE DUST SOURCES

REQUIRED RECORDS

UNPAVED ROADS/LOTS	1. DATE OF TREATMENT 2. CONTROL MEASURE USED 3. RESPONSIBLE PERSON'S INITIALS 4. NAME OF PRODUCT APPLIED 5. AMOUNT OF SOLUTION/WATER APPLIED 6. DILUTION RATIO 7. ROAD SEGMENT/LOT IDENTIFICATION
PAVED ROADS/LOTS	1. DATE OF TREATMENT 2. CONTROL MEASURE USED 3. RESPONSIBLE PERSON'S INITIALS 4. ROAD SEGMENT/LOT IDENTIFICATION
STORAGE PILES/MATERIAL HANDLING	1. DATE OF TREATMENT 2. CONTROL MEASURE USED 3. RESPONSIBLE PERSON'S INITIALS 4. DILUTION RATIO (IF APPLICABLE) 5. AMOUNT OF DUST SUPPRESSANT/WATER APPLIED 6. IDENTIFICATION OF PILE/MATERIAL HANDLING OPERATION TREATED 7. EQUIPMENT USED

OPTIONAL RECORDS

WEATHER CONDITIONS	1. PRECIPITATION 2. TEMPERATURE 3. WIND DIRECTION AND VELOCITY